

## SA20: Land south and west of Imberhorne Upper School, Imberhorne Lane - Index by ID Number

ID	Respondent	Organisation	BehalfOf	Respondent Category	Participate
534	Mrs P Slatter	Felbridge Parish Council		Town & Parish Council	<input type="checkbox"/>
584	Mr R Whalley			Resident	<input type="checkbox"/>
602	Mr J Beale	East Grinstead Society		Organisation	<input type="checkbox"/>
666	Mrs J Holden	East Grinstead Town Council		Town & Parish Council	<input type="checkbox"/>
668	Mr A Byrne	Historic England		Statutory Consultee	<input type="checkbox"/>
710	Mr N Burns	Natural England		Statutory Consultee	<input type="checkbox"/>
713	Mrs H Hyland	Environment Agency		Statutory Consultee	<input type="checkbox"/>
717	Mr R Tullett	Sussex Area Ramblers Association	Sussex Area Ramblers Association	Organisation	<input type="checkbox"/>
738	Ms K Lamb	DMH Stallard	Welbeck - Imberhorne	Promoter	<input checked="" type="checkbox"/>
748	Ms L Brook	Sussex Wildlife Trust		Statutory Consultee	<input type="checkbox"/>
827	Mr G Wallace			Resident	<input type="checkbox"/>
910	Ms V Riddle	Tandridge District Council		Local Authority	<input type="checkbox"/>
913	Mr J Greene	Surrey County Council		Local Authority	<input type="checkbox"/>
948	Mrs H Lawrence			Resident	<input type="checkbox"/>
1005	Mr L Beirne			Resident	<input type="checkbox"/>
1410	Ms J Barter			Resident	<input type="checkbox"/>
1413	Mr R Smith			Resident	<input type="checkbox"/>
1414	Ms K Fisher			Resident	<input type="checkbox"/>
1415	Ms C Rowell			Resident	<input type="checkbox"/>
1416	Mr J Tooth			Resident	<input type="checkbox"/>
1417	Mr M Richardson			Resident	<input type="checkbox"/>
1418	Ms B Eddington			Resident	<input type="checkbox"/>
1419	Mr J Sachon			Resident	<input type="checkbox"/>
1431	Ms D Shelton	WSCC Estates Team		Statutory Consultee	<input type="checkbox"/>
1433	Mr R King			Resident	<input type="checkbox"/>
1434	Mr W Byam-Cook			Resident	<input type="checkbox"/>
1435	Mr R Clay			Resident	<input type="checkbox"/>
1436	Ms M Collins			Resident	<input type="checkbox"/>
1439	Mrs S Dennis			Resident	<input type="checkbox"/>
1440	Mr P Walker			Resident	<input type="checkbox"/>
1442	Ms M Baldwin			Resident	<input type="checkbox"/>
1463	Ms A Vaughan			Resident	<input type="checkbox"/>
1467	Mr M Rann			Resident	<input type="checkbox"/>
1472	Mr D Burke			Resident	<input type="checkbox"/>
1475	Ms B Peterson			Resident	<input type="checkbox"/>
1476	Ms E Kelly			Resident	<input type="checkbox"/>

ID	Respondent	Organisation	BehalfOf	Respondent Category	Participate
1477	Ms L Kelly			Resident	<input type="checkbox"/>
1478	Ms J Holdaway			Resident	<input type="checkbox"/>
1487	Mr A Fennell			Resident	<input type="checkbox"/>
1488	Mr T Johnston			Resident	<input type="checkbox"/>
1535	Ms S Clarke			Resident	<input type="checkbox"/>
1560	Mr A Ward			Resident	<input type="checkbox"/>
1562	Mr F Lilley			Resident	<input type="checkbox"/>
1566	Mr P Johnson			Resident	<input type="checkbox"/>
1584	Ms R Eveleigh			Resident	<input type="checkbox"/>
1596	Mr P Lockwood			Resident	<input type="checkbox"/>
1618	Mr J Feck			Resident	<input type="checkbox"/>
1641	Mrs P Byam-Cook			Resident	<input type="checkbox"/>
1690	Mrs C Lightburn			Resident	<input type="checkbox"/>
1691	Mr E Lightburn			Resident	<input type="checkbox"/>
1723	Mrs J Roberts			Resident	<input type="checkbox"/>
1792	Ms J Edwards	Sport England		Statutory Consultee	<input type="checkbox"/>
1810	Mr M Bishop			Resident	<input type="checkbox"/>
1846	R Browne			Resident	<input type="checkbox"/>
1910	Ms K Lambert			Resident	<input type="checkbox"/>
1918	Mrs K Picton			Resident	<input type="checkbox"/>
2002	Mr R Burleigh			Resident	<input type="checkbox"/>
2065	Mr A Black	Andrew Black consulting	Denton - Horsham Road	Promoter	<input type="checkbox"/>
2067	Mr A Black	Andrew Black consulting	Denton Homes - Butlers green	Promoter	<input type="checkbox"/>
2077	L Wilson			Resident	<input type="checkbox"/>
2079	Mr A Black	Andrew Black consulting	Vanderbilt Homes - Hurstwood HH	Promoter	<input type="checkbox"/>
2080	Mr A Black	Andrew Black consulting	Vanderbilt homes - CDR	Promoter	<input type="checkbox"/>
2092	Mr T Burden	Turley	Rainier Developments Copthorne	Promoter	<input checked="" type="checkbox"/>
2140	Mr C Hough	Sigma Planning Services	Rydon Homes Ltd	Promoter	<input checked="" type="checkbox"/>
2165	Mrs & Mr J & J Hayler			Resident	<input type="checkbox"/>
2171	Mr S Tremmel			Resident	<input type="checkbox"/>
2231	Mrs R Smith			Resident	<input type="checkbox"/>
2253	Ms C Bryant			Resident	<input type="checkbox"/>
2287	A Casey			Resident	<input type="checkbox"/>
2323	Mr M Casey			Resident	<input type="checkbox"/>
2360	Ms B Fox	The Woodland Trust	The Woodland Trust	Organisation	<input type="checkbox"/>
2401	Mrs G Jordan			Resident	<input checked="" type="checkbox"/>



ID	Respondent	Organisation	BehalfOf	Respondent Category	Participate
2438	Ms K Nottage			Resident	<input type="checkbox"/>

## Site Allocations DPD: Regulation 19 Consultation Response

**Policy:** SA20

**ID:** 534

**Response Ref:** Reg19/534/4

**Respondent:** Mrs P Slatter

**Organisation:** Felbridge Parish Council

**On Behalf Of:**

**Category:** Town & Parish Council

**Appear at Examination?** x

# FELBRIDGE PARISH COUNCIL | RESPONSE TO MSDC DPD SITE ALLOCATIONS 2020

## Part A – Your Details

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### 1. Personal Details

Title	<input type="text" value="MRS."/>
First Name	<input type="text" value="PATRICIA"/>
Last Name	<input type="text" value="SLATTER"/>
Job Title (where relevant)	<input type="text" value="PARISH CLERK"/>
Organisation (where relevant)	<input type="text" value="FELBRIDGE PARISH COUNCIL"/>
Respondent Ref. No. (if known)	<input type="text"/>
On behalf of (where relevant)	<input type="text"/>
Address Line 1	<input type="text" value="FELBRIDGE VILLAGE HALL"/>
Line 2	<input type="text" value="CRAWLEY DOWN ROAD"/>
Line 3	<input type="text" value="FELBRIDGE"/>
Line 4	<input type="text"/>
Post Code	<input type="text" value="RH19 2NT"/>
Telephone Number	<input type="text" value="01342-315661"/>
E-mail Address	<input type="text" value="clerkfpc@aol.com"/>



Information will only be used by Mid Sussex District Council and its employees in accordance with the Data Protection Act 1998. Mid Sussex District Council will not supply information to any other organisation or individual except to the extent permitted by the Data Protection Act and which is required or permitted by law in carrying out any of its proper functions.

The information gathered from this form will only be used for the purposes described and any personal details given will not be used for any other purpose.

## Part B Representation 1

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Name or Organisation:

Felbridge Parish Council

### 3a. Does your comment relate to:

Site Allocations DPD	<input checked="" type="checkbox"/>	Sustainability Appraisal	<input type="checkbox"/>	Habitats Regulations Assessment	<input type="checkbox"/>
Community Involvement Plan	<input checked="" type="checkbox"/>	Equalities Impact Assessment	<input type="checkbox"/>	Draft Policies Maps	<input type="checkbox"/>

### 3b. To which part does this representation relate?

Paragraph	<input type="text"/>	Policy SA	<input type="text"/>	Draft Policies Map	<input type="text"/>
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### 4. Do you consider the Site Allocations DPD is:

4a. In accordance with legal and procedural requirements; including the duty to cooperate. Yes ☐ No ☒

4b. Sound Yes ☐ No ☐

### 5. With regard to each test, do you consider the Plan to be sound or unsound:

	Sound	Unsound
(1) Positively prepared	<input type="checkbox"/>	<input type="checkbox"/>
(2) Justified	<input type="checkbox"/>	<input type="checkbox"/>
(3) Effective	<input type="checkbox"/>	<input type="checkbox"/>
(4) Consistent with national policy	<input type="checkbox"/>	<input type="checkbox"/>

**6b.** Please give details of why you consider the Site Allocations DPD is not legally compliant or is unsound. Please be as precise as possible.

We believe that the Draft DPD has **not** been prepared in accordance with the legal and procedural requirements; including the duty to cooperate.

MSDC states that Town and Parish Councils were contacted during the formative stages of the DPD. The Statement of Community Involvement states “the community should be involved as early as possible in the decision making process when there is more potential to make a difference”. Felbridge Parish Council was not contacted at any point during the development of the DPD despite site SA19 being variously described in the DPD and supporting documents as ‘a sympathetic extension to Felbridge’, ‘sympathetic to the landscape setting and character of Felbridge’ and ‘maximises connectivity with the existing settlement of Felbridge’.

The Regulation 18 consultation communications were severely restricted limiting the number of local residents aware of the consultation and thus the number of responses was low. The Council failed to publicise this stage of consultation in its own publication *Mid Sussex Matters* which goes to every resident in the District. The Summer 2019 edition was published in July but contains no mention of the forthcoming consultation. This lack of communication continued with the Regulation 19 consultation not being included in the July 2020 edition of *Mid Sussex Matters* despite the Press Release for the consultation being issued only 17 days later.

Even the MSDC consultations website fails to notify the public that there is an ongoing Regulation 19 consultation (see screen shot of 20/9/20 below).



Tandridge District Council have confirmed that they were not informed of the Regulation 19 consultation and have sought an extension to enable them to prepare a response. This is despite there being a Statement of Common Ground between MSDC and TDC.

Felbridge Parish Council feels strongly that residents have not been properly consulted as part of this process. Additionally it seems clear that the Duty to Co-operate has not been met given the fact that the adjacent authority of Tandridge was not consulted. This would also lead us to questions if sufficient co-operation has been undertaken with other authorities adjacent to Mid Sussex.

7. Please set out what change(s) you consider necessary to make the Site Allocations DPD legally compliant or sound, having regard to the reason you have identified at question 5 above where this relates to soundness.

You will need to say why this change will make the Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

We request that the following action is taken with respect to the draft Site Allocations DPD and associated documents:

The DPD should be withdrawn as it is not legally compliant - the consultation was not carried out in line with national policy or the MSDC Statement of Community Involvement.

**Please note** your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested change, as there will not normally be a subsequent opportunity to make further representations based on the original representation at publication stage.

**After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.**

8. If your representation is seeking a change, do you consider it necessary to attend and give evidence at the hearing part of the examination? (tick below as appropriate)

☒

**No**, I do not wish to participate at the oral examination

☐

**Yes**, I wish to participate at the oral examination

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

**Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

**10. Please notify me when:**

(i) The Plan has been submitted for Examination

☐

(ii) The publication of the recommendations from the Examination

☐

(iii) The Site Allocations DPD is adopted

☐

24<sup>th</sup> September 2020

## Part B Representation 2

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Name or Organisation:

Felbridge Parish Council

3a. Does your comment relate to:

Site Allocations DPD	<input checked="" type="checkbox"/>	Sustainability Appraisal	<input checked="" type="checkbox"/>	Habitats Regulations Assessment	<input type="checkbox"/>
Community Involvement Plan	<input type="checkbox"/>	Equalities Impact Assessment	<input type="checkbox"/>	Draft Policies Maps	<input type="checkbox"/>

3b. To which part does this representation relate?

Paragraph	<input type="text"/>	Policy SA	19	Draft Policies Map	<input type="text"/>
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4. Do you consider the Site Allocations DPD is:

4a. In accordance with legal and procedural requirements; including the duty to cooperate. Yes ☐ No ☐

4b. Sound Yes ☐ No ☒

5. With regard to each test, do you consider the Plan to be sound or unsound:

	Sound	Unsound
(1) Positively prepared	<input type="checkbox"/>	<input type="checkbox"/>
(2) Justified	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(3) Effective	<input type="checkbox"/>	<input type="checkbox"/>
(4) Consistent with national policy	<input type="checkbox"/>	<input type="checkbox"/>

**6b.** Please give details of why you consider the Site Allocations DPD is not legally compliant or is unsound. Please be as precise as possible.

We believe the Site Allocations DPD is **Unsound** as the inclusion of site SA19 is **not Justified**

Site SA19 is variously described in the DPD and supporting documents as ‘a sympathetic extension to Felbridge’, ‘sympathetic to the landscape setting and character of Felbridge’ and ‘maximises connectivity with the existing settlement of Felbridge’. Tandridge District Council have confirmed that they did not allocate sites in Felbridge as it is a tier 3 settlement and therefore not as sustainable as others. The site sits at the end of a thin strip of the East Grinstead built up area and is not connected to East Grinstead Town Centre with future residents having to travel through Surrey to get to East Grinstead.

The DPD repeatedly states that East Grinstead is a Category 1 settlement, however the sustainability assessment fails to account for the fact that site SA19 lies outside the settlement of East Grinstead. Felbridge is a rural village in Tandridge District, Surrey. It is defined as a rural settlement in the Green Belt with 532 dwellings within the built-up area of the Village Boundary. As a rural village, Felbridge has no doctor surgeries, pharmacy, dentist, opticians or any other such infrastructure. Due to the County and District Council process for handling infrastructure contributions resulting from development, not a single pound of funding has been contributed to any Surrey facilities or to fund any infrastructure improvements within Felbridge Village from the 120 Mid Sussex houses recently granted consent on the south of the village or any previous approvals.

The site has a significant area within the non-climate change EA flood zone 3, reducing the developable land area such that a housing density of 31dph would be required to achieve the 200 units allocated. This density is totally inappropriate for this location on the edge of the Village where the existing density is 14dph, and does not comply with DG34 of the Mid Sussex Design Guide.

Whilst we have submitted objections to Site SA20, we believe that site SA20 is a far more sustainable proposal than SA19 as it is located much closer to East Grinstead town centre and is of a scale that can deliver significant infrastructure within the site further reducing the need to car journeys. As there is additional land within the SA20 site and the proposed housing density for that site is only 8.5dph, **MSDC have failed in their sustainability assessment to consider the alternative of increasing the SA20 site to 750 dwellings to avoid the inclusion of the unsustainable SA19 site.**

Furthermore, in June 2020 (since the draft DPD was issued), Mid Sussex gave permission to turn the last remaining large office block, Grinstead House in Wood Street, into 253 residential apartments. This site was not previously allocated and thus counts towards the objectively assessed housing need. **Thus the allocation of Site SA19 is no longer required to deliver the housing allocation for East Grinstead.**

**7.** Please set out what change(s) you consider necessary to make the Site Allocations DPD legally compliant or sound, having regard to the reason you have identified at question 5 above where this relates to soundness.

You will need to say why this change will make the Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.



We request that the following action is taken with respect to the draft Site Allocations DPD and associated documents:

Site SA19 should be withdrawn as it is not justified

**Please note** your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested change, as there will not normally be a subsequent opportunity to make further representations based on the original representation at publication stage.

**After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.**

8. If your representation is seeking a change, do you consider it necessary to attend and give evidence at the hearing part of the examination? (tick below as appropriate)

☒ X

No, I do not wish to participate at the oral examination

☐

Yes, I wish to participate at the oral examination

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

**Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

**10. Please notify me when:**

- (i) The Plan has been submitted for Examination
- (ii) The publication of the recommendations from the Examination
- (iii) The Site Allocations DPD is adopted

☐☐☐

Signature:



Date:

24<sup>th</sup> September 2020

## Part B Representation 3

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Name or Organisation:

Felbridge Parish Council

### 3a. Does your comment relate to:

Site Allocations DPD	<input checked="" type="checkbox"/>	Sustainability Appraisal	<input checked="" type="checkbox"/>	Habitats Regulations Assessment	<input type="checkbox"/>
Community Involvement Plan	<input type="checkbox"/>	Equalities Impact Assessment	<input type="checkbox"/>	Draft Policies Maps	<input type="checkbox"/>

### 3b. To which part does this representation relate?

Paragraph	<input type="text"/>	Policy SA	<input type="text" value="19 &amp; 20"/>	Draft Policies Map	<input type="text"/>
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### 4. Do you consider the Site Allocations DPD is:

4a. In accordance with legal and procedural requirements; including the duty to cooperate. Yes ☐ No ☐

4b. Sound Yes ☐ No ☒

### 5. With regard to each test, do you consider the Plan to be sound or unsound:

	Sound	Unsound
(1) Positively prepared	<input type="checkbox"/>	<input type="checkbox"/>
(2) Justified	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(3) Effective	<input type="checkbox"/>	<input type="checkbox"/>
(4) Consistent with national policy	<input type="checkbox"/>	<input type="checkbox"/>

**6b.** Please give details of why you consider the Site Allocations DPD is not legally compliant or is unsound. Please be as precise as possible.

We believe the Site Allocations DPD is **Unsound** as the inclusion of sites SA19 and SA20 is **not Justified** as it relies upon **unsound** transport assessments (failure to use proportionate data) and the site assessments provide no evidence that acknowledged highways constraints were considered when weighing these sites against others.

The existing severity at the Star (A22/A264) junction is massively understated in the DPD transport assessment which shows the A264 arm of the junction was at 65% capacity in 2017 and will increase to 105% by 2031 without any of the sites within the DPD being developed.

### Mid Sussex Baseline data

	2017							
	AM Dem (Veh)	AM RFC (%)	AM Delay (s)	AM AvgQ (pcu)	PM Dem (Veh)	PM RFC (%)	PM Delay (s)	PM AvgQ (pcu)
A264 Copthorne Road (W)	676	61	15	2	609	65	21	3
A22 Eastbourne Road (N)	384	68	28	2	504	65	20	2
A22 London Road (S)	1326	73	70	14	1112	68	47	4

The MSDC model has produced RFC (Ratio of Flow Capacity) figures for the junction, these model outputs are only for priority junction (junctions without traffic lights). This junction is signalised and therefore the correct model to use is LinSig which would have produced DoS (Degree of Saturation) which is the measure for signalised junctions. Thus, the baseline data and any analysis using it is **unsound**.

Mid Sussex did have access to a more recent (2018) transport assessment that they jointly commissioned with Tandridge District Council. The data from that assessment was used to support the Tandridge Local Plan that is currently in examination. The Star junction baseline data from the TDC Plan is:-

### Tandridge<sup>1</sup>

**Table 1-1 – Baseline Assessment 2018 Baseline Scenario**

2018 Baseline Assessment	AM Peak Period			PM Peak Period		
	Degree of Saturation	Mean Max Queue	Delay per PCU (secs)	Degree of Saturation	Mean Max Queue	Delay per PCU (secs)
A22 South	82.7%	16	16	83.6%	16	17
A264	106.6%	48	182	101.4%	33	115
A22 North	56.0%	9	31	96.0%	22	76

This shows the junction was already above 106% capacity in 2018.

The junction severity was also evidenced by the Inspector for APP/M3645/W/18/3198090 who included in his decision (Para 34) data that demonstrates that the queue length of eastbound traffic on the A264 increases by 168 vehicles in the 2 hour period 4:15pm to 6:15pm. The throughput of the junction in the PM peak averages 719 vehicles per hour<sup>2</sup>, thus the Inspector is recording that the junction was already operating at 112% of its capacity based upon 2018 traffic data. Since then 120 additional dwellings have been approved within 500m of this junction.

The severity of the Star junction is also being challenged by the Examination Inspector for the Tandridge District Plan as the junction is impacted by the proposed South Godstone Garden Community of 4,000 dwellings. The emerging Tandridge District Plan included mitigation of the impact by the proposal to create two lanes turning south from the A264 into the A22. This proposal has already been identified for implementation as mitigation for the 200 houses approved at Hill Place Farm [APP/D3830/W/16/3142487] and the 121 dwellings approved along Crawley Down Road and Copthorne Road [APP/M3645/W/18/3205537, APP/M3645/W/18/3198090 & TA2019/1453]. However, the funding for the works is identified in the Tandridge District Infrastructure Delivery Plan 2019 (examination document INF1) as being from a Housing Infrastructure Fund (HIF) bid. That bid was unsuccessful and the Examination Inspector has now requested further information on how the transport mitigation will be delivered [ID13].

The Barratt Transport Model submitted in support of site SA19 states the Star junction was operating at 84% in 2019, this is far below the Inspector's observation and the Tandridge District Plan data and further calls into question the validity of the transport models being used to support the inclusion of Site SA19.

MSDC have failed to use the latest transport assessment that they commissioned, even though that data is being used to support the latest Tandridge Local Plan.

The Statement of Common Ground between TDC and MSDC confirms that the parties agree mitigation is required at the Star junction, yet the transport assessment used to support the DPD shows it operating well below its capacity.

Both sites SA19 and SA20 were evaluated as 'high performing sites'. The site assessment section on *highways* was left blank despite the acknowledgement in the SoCG of the highways constraints in this area. Thus, no evidence has been presented to show that the acknowledged highways constraints were considered when weighing these sites against others.

**The inclusion of Sites SA19 and SA20 is Unsound as proportionate data has not been used to justify them.**

7. Please set out what change(s) you consider necessary to make the Site Allocations DPD legally compliant or sound, having regard to the reason you have identified at question 5 above where this relates to soundness.

You will need to say why this change will make the Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

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<sup>2</sup> iTransport data submitted as evidence for this appeal.

We request that the following action is taken with respect to the draft Site Allocations DPD and associated documents:

Sites SA19 and SA20 should be withdrawn as proportionate data has not been used to justify them.

The latest Transport Study by WSP commissioned by MSDC & TDC should be published in full and its content used to inform the DPD.

**Please note** your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested change, as there will not normally be a subsequent opportunity to make further representations based on the original representation at publication stage.

**After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.**

8. If your representation is seeking a change, do you consider it necessary to attend and give evidence at the hearing part of the examination? (tick below as appropriate)

☒

**No**, I do not wish to participate at the oral examination

☐

**Yes**, I wish to participate at the oral examination

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

**Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

**10. Please notify me when:**

- (i) The Plan has been submitted for Examination
- (ii) The publication of the recommendations from the Examination
- (iii) The Site Allocations DPD is adopted

☐☐☐

24<sup>th</sup> September 2020

## Part B Representation 4

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Name or Organisation:

Felbridge Parish Council

### 3a. Does your comment relate to:

Site Allocations DPD	<input checked="" type="checkbox"/>	Sustainability Appraisal	<input checked="" type="checkbox"/>	Habitats Regulations Assessment	<input type="checkbox"/>
Community Involvement Plan	<input type="checkbox"/>	Equalities Impact Assessment	<input type="checkbox"/>	Draft Policies Maps	<input type="checkbox"/>

### 3b. To which part does this representation relate?

Paragraph	<input type="text"/>	Policy SA	19	Draft Policies Map	<input type="text"/>
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### 4. Do you consider the Site Allocations DPD is:

4a. In accordance with legal and procedural requirements; including the duty to cooperate. Yes ☐ No ☐

4b. Sound Yes ☐ No ☒

### 5. With regard to each test, do you consider the Plan to be sound or unsound:

	Sound	Unsound
(1) Positively prepared	<input type="checkbox"/>	<input type="checkbox"/>
(2) Justified	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(3) Effective	<input type="checkbox"/>	<input type="checkbox"/>
(4) Consistent with national policy	<input type="checkbox"/>	<input type="checkbox"/>



**6b.** Please give details of why you consider the Site Allocations DPD is not legally compliant or is unsound. Please be as precise as possible.

We believe the Site Allocations DPD is **Unsound** as the inclusion of sites SA19 is **not Justified** as it does not comply with the Spatial Strategy and Settlement Hierarchy DP6.

DP6 defines the settlement hierarchy as;

Category	Settlement characteristics and function	Settlements
Category 1	Settlement with a comprehensive range of employment, retail, health, education leisure services and facilities. These settlements will also benefit from Heath good public transport provision and will act as a main service centre for the smaller settlements.	Burgess Hill, East Grinstead, Haywards
Category 2	Larger villages acting as Local Service Centres providing key services in the rural area of Mid Sussex. These settlements serve the wider hinterland and benefit from a good range of services and facilities, including employment opportunities and access to public transport.	Copthorne, Crawley Down, Cuckfield, Hassocks and Keymer, Hurstpierpoint and Lindfield
Category 3	Medium sized villages providing essential services for the needs of their own residents and immediate surrounding communities. Whilst more limited, these can include key services such as primary schools, shops, recreation and community facilities, often shared with neighbouring settlements.	Albourne, Ardingly, Ashurst Wood, Balcombe, Bolney, Handcross, Horsted Keynes, Pease Pottage, Sayers Common, Scaynes Hill, Sharpthorne, Turners Hill and West Hoathly
Category 4	Small villages with limited services often only serving the settlement itself.	Ansty, Staplefield, Slaugham, Twineham and Warninglid
Category 5	These small settlements have very limited or no services.	Hamlets such as Birch Grove, Brook Street, Hickstead, Highbrook and Walstead.

Felbridge is a rural village in Surrey with a small strip along its southern boundary falling within Mid Sussex District. Felbridge is separated from East Grinstead and Policy DP13 prevents the coalescence of Felbridge with East Grinstead.

Tandridge District Settlement Hierarchy Addendum 2018 states that “although the proximity of East Grinstead plays a role in Felbridge’s sustainability, the settlement itself can only demonstrate a basic level of provision and as such is categorised as a Tier 3 (rural settlement)”.

Felbridge village would therefore be defined as a Category 3 Settlement in accordance with DP6. As a category 3 settlement, Felbridge should not have been allocated 200 houses as the total allocation for all the category 3 settlements in Mid Sussex is only 238.

Site SA19 is variously described in the DPD and supporting documents as ‘a sympathetic extension to Felbridge’, ‘sympathetic to the landscape setting and character of Felbridge’ and ‘maximises connectivity with the existing settlement of Felbridge’. It is clear that this site is intended to be an addition to the category 3 Village of Felbridge rather than to the category 1 town of East Grinstead to which the allocation belongs.

**The inclusion of Site SA19 is Unsound as it is not justified in compliance with DP6.**

We believe the Sustainability Appraisal for Site SA19 is **Unsound** as it has not been based upon an appropriate assessment. The inclusion of the site in the DPD is therefore **not Justified**.

Analysis of the Sustainability Assessment Criteria as applied to SA19

**Social Sustainability Objective No. 3**

Objective: To maintain and improve the opportunities for everyone to acquire the skills needed to find and remain in work and improve access to educational facilities

Indicators

Percentage of population of working age qualified to at least NVQ level 3 (or equivalent)

Percentage of adults with poor literacy and numeracy skills

Number of households within a 15 minute walk (approx. 1.2km) from a Primary School

Stated Impact for SA19: Significant positive impact

The selection criteria for housing sites in the ‘Site Selection Paper 2 - Methodology for Site Selection’ measures the sustainability objective solely on the distance between the proposed site and the nearest primary school.

NPPF (2018) paragraph 94 is quoted in support of this objective “It is important that a sufficient choice of school places is available to meet the needs of existing and new communities. Local planning authorities should... give great weight to the need to create, expand or alter schools through the preparation of plans and decisions on applications”.

The location of site SA19, is correctly assessed as being a 10 minute walk from the village school. However, the NPPF paragraph highlights the importance of sufficient school places being available.

Other than proximity there is no evidence to indicate that MSDC have assessed the school’s ability to provide sufficient places. The school is already oversubscribed. With a capacity of 214 pupils, the school website is advertising only 4 year 5 places on 16/09/2020.

MSDC have already permitted 120 new homes still to be built within a 5 minute walk of the school and now propose to allocate a further 200.

The school has limited capacity for expansion and lies over the border in Tandridge. Even if sufficient capacity could be accommodated Surrey County Council are unlikely to fund an expansion as there is no unmet education need in southern part of Tandridge. A ‘significant positive’ impact **cannot be justified**.

**Social Sustainability Objective No. 4**

Objective: To improve access to retail and community facilities

Indicators

Number of households within a 15 minute walk (approx. 1.2km) from a superstore/town centre/high street shopping facilities)



Number of households within a 15 minute walk (approx. 1.2km) from a convenience store  
Number of households within a 15 minute walk (approx. 1.2km) from community facilities (e.g. community hall, place of worship, library)  
Number of applications resulting in a loss of community facilities (e.g. shop, pub, place of worship, etc)  
Stated Impact for SA19: Significant positive impact

The Sustainability Appraisal conclusions state that “All site allocations make a positive contribution towards the sustainability objective to improve access to retail and community facilities; all sites are within a 15 minute walk of the nearest convenience store.”

There is a small convenience store within a 15 minute walk (approx. 1.2km) of the site; also a ladies hairdressers, a village hall and a pub. However, town centre shopping facilities, restaurants, library and superstore are considerably further away being a 45 minute walk (approx. 3.6km).

This compares very poorly with allocated site SA18 (Former East Grinstead Police Station) located on the edge of the town. This site benefits from nearby town centre shopping facilities; community facilities including a theatre, library and place of worship; a selection of restaurants and a large superstore all within 15 minute walk. Site SA18 could justifiably be assessed at the highest level against the sustainability objective but for some reason falls short and is only rated as a ‘Positive’ impact.

Contrast this with the assessment of Site SA19 which has no town centre or superstore facilities but is given the top ‘Significant Positive’ rating. **This cannot be correct.**

### **Environmental Sustainability Objective No. 11**

Objective: To reduce road congestion and pollution levels by improving travel choice, and reducing the need for travel by car, thereby reducing the level of greenhouse gases from private cars and their impact on climate change. (SEA)

#### Indicators

Number of households within a 5 minute walk (approx. 400m) of a bus stop with frequent service (3+ an hour)

Number of households within a 10 minute walk (approx. 800m) of a bus stop with less frequent service (less than 3 an hour)

Number of households within a 15 minute walk (approx. 1.2km) of a train station

Proportion of journeys to work by public transport

Percentage of residents living and working within Mid Sussex

Monetary investment in sustainable transport schemes (value of s.106 agreements)

Number of Air Quality Management Areas (AQMA) within the District

Stated Impact for SA19: Significant positive impact

The site selection criteria for housing sites in the ‘Site Selection Paper 2 - Methodology for Site Selection’ refers to NPPF (2018 Paragraph 103) in support of the Sustainability Objective; “Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. This can help to reduce congestion and emissions, and improve air quality and public health”

However, as with other sites, SA19 doesn’t appear to have been assessed against the Sustainability Objective at all, despite the widely acknowledged highways constraint in East Grinstead.

In October 2019, MSDC's jointly commissioned WSP traffic study reported that "The Felbridge junction has been identified as a constraint to development coming forward in Tandridge and the Felbridge/East Grinstead area. The junction currently operates above capacity leading to congestion during peak periods and at other times of the day"

The declining employment space taken together with the significant levels of committed development will result in further out-commuting. Allocating an additional 722 new homes in East Grinstead will serve only to exacerbate the problem

The nearest train station is a 45minute walk (3.6km) and there is no direct line to Crawley and MSDC rely on census data from 2011 to show that less than 15% of people travel to work by public transport.

Based on available evidence, the proposed allocations for East Grinstead will lead to significant increases in car travel using heavily congested roads. This indicates that the impact of these sites on the Sustainability Objective will be negative NOT 'Unknown'.

#### **Economic Sustainability Objective No. 14**

Objective: To encourage the regeneration and prosperity of the District's existing Town Centres and support the viability and vitality of village and neighbourhood centres

##### Indicators

Total amount of floorspace for "Town Centre Uses" (A1, A2, B1a, D2)

Number of households within a 15 minute walk (approx. 1.2km) from a town centre superstore/town centre/high street shopping facilities)

Stated Impact for SA19: Significant positive impact

Site SA19 is located outside the built-up boundary on the edge of the rural village in Felbridge. MSDC regard Felbridge as an extension to East Grinstead and as such does not exist as a separate entity in their settlement hierarchy.

TDC classify Felbridge as a tier 3 medium sized village as it can only demonstrate a basic level of provision. The proposed site location for the 200 new homes is a 45 minute walk (3.5km) from the town centre facilities in East Grinstead. The nearest superstore and high street shopping facilities are equally distant.

There are no proposals in the Infrastructure Delivery Plan to improve the meagre facilities in the village and any CIL funding will go Mid Sussex and not to Tandridge.

There is no evidence provided to show how 200 houses on the edge of Felbridge will provide a positive sustainability impact but just rely on the general statement that they will "encourage the regeneration and prosperity of the District's existing Town Centres and support the viability and vitality of village and neighbourhood centres."

Without evidence to the contrary 200 more homes (in addition to the 120 already committed homes south of the Crawley Down Road in Felbridge) can only have a negative effect on the function and character of the village and therefore it **cannot be justified** to assess the site as having a 'significant positive impact'.

### **Economic Sustainability Objective No. 15**

Objective: To ensure high and stable levels of employment so everyone can benefit from the economic growth of the District

Indicators

Percentage of Mid Sussex residents who are employed

Percentage of Mid Sussex residents who are economically active

Average weekly income (gross) for those who are employed in the District

Percentage of residents living and working within Mid Sussex

Job density (ratio of jobs to working age population)

Stated Impact for SA19: Positive impact

MSDC have recommended the allocation of 3 sites in East Grinstead and Felbridge for a total of 722 homes with no proposals for additional employment space.

MSDC's latest monitoring of housing supply to April 2020 shows that a further 984 homes (714 with permission) are already committed for East Grinstead. There has been a considerable loss of office space to residential development since the start of the plan period. The MSDC 2018 Economic Profile Study reported the stock of commercial office space to be less than 20,000m<sup>2</sup>.

In July 2020, MSDC allowed the last remaining office block in East Grinstead to be converted into residential apartments. 254 new homes and 12,000m<sup>2</sup> (or 60%) of the remaining stock of office space was removed. Not only were 1,000 workers displaced from the town centre but the conversion will result in 500 or so extra residents who will struggle to find jobs locally.

When asked, MSDC said that they do not monitor the amount of office space lost to residential conversions. Therefore, they cannot know how much office space is currently available in East Grinstead in order to inform planning decisions.

All 3 sites in East Grinstead have been assessed to have a 'positive impact' on the Economic Sustainability Objective.

In the Sustainability Appraisal conclusion it states that "All site allocations have a positive impact on the sustainability objective to ensure high and stable levels of employment so everyone can benefit from the economic growth of the District".

No evidence is presented to support this general statement. On the contrary, there is evidence to suggest that allocating yet more sites to East Grinstead without more employment provision will have a negative impact.

### **Economic Sustainability Objective No. 16**

Objective: To sustain economic growth and competitiveness across the District, protect existing employment space, and to provide opportunities for people to live and work within their communities therefore reducing the need for out-commuting

Indicators

Net increase/decrease in commercial (Use Classes B1(b,c), B2, B8) and office (B1(a) and A2) floorspace

Number of businesses within the District

Number of new businesses setting up in the District

Stated Impact for SA19: Positive impact

In its key findings, the MSDC 2018 Economic Profile Study says that “There has been a significant loss of office floor space to residential conversions particularly in East Grinstead”. No new employment space was allocated to East Grinstead in the local plan and none is proposed in the Site Allocations DPD. Therefore, the evidence indicates that East Grinstead has suffered a net decrease in employment space and yet, as a tier 1 settlement, expected to take a significant proportion of the district’s housing need. 782 homes have already been delivered in East Grinstead since the start of the plan period with 968 more homes with permission still to come, plus a further 270 allocated in the local plan. The Site Allocations DPD is now proposing to allocate a further 772 homes to contribute towards the shortfall of homes for Crawley workers.

The Sustainability Appraisal conclusions state “All site allocations have a positive impact on the sustainability objective to sustain economic growth and competitiveness across the District, protect existing employment space, and to provide opportunities for people to live and work within their communities therefore reducing the need for out-commuting.”

With a lack of new employment space in East Grinstead and a significant increase in the number of new homes and displaced office workers more out-commuting is inevitable. Despite this all the East Grinstead sites [SA18, 19 & 20] are rated as a ‘Positive Impact’ with no evidence to support their assessment. The decline in employment space and the rise of out-commuting is contrary to the stated Sustainability Objective so the sites proposed for East Grinstead must qualify for a ‘Significant Negative Impact’.

We therefore believe that the Sustainability Appraisal for site SA19 is **unsound** as it has **not used proportionate data to justify** its ratings for the sites against the stated indicators, and in comparison to other sites.

7. Please set out what change(s) you consider necessary to make the Site Allocations DPD legally compliant or sound, having regard to the reason you have identified at question 5 above where this relates to soundness.

You will need to say why this change will make the Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

We request that the following action is taken with respect to the draft Site Allocations DPD and associated documents:

Site SA19 should be withdrawn as a significant housing allocation to a Tier 3/Category 3 settlement is not justified.

Site SA19 should be withdrawn until a justified Sustainability Appraisal has been completed using

**Please note** your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested change, as there will not normally be a subsequent opportunity to make further representations based on the original representation at publication stage.

**After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.**

8. If your representation is seeking a change, do you consider it necessary to attend and give evidence at the hearing part of the examination? (tick below as appropriate)

☒

**No**, I do not wish to participate at the oral examination

☐

**Yes**, I wish to participate at the oral examination

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

**Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

**10. Please notify me when:**

(i) The Plan has been submitted for Examination

☐

(ii) The publication of the recommendations from the Examination

☐

(iii) The Site Allocations DPD is adopted

☐

Signature:



Date:

24<sup>th</sup> September 2020

## Part B Representation 5

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Name or Organisation:

Felbridge Parish Council

### 3a. Does your comment relate to:

Site Allocations DPD	<input checked="" type="checkbox"/>	Sustainability Appraisal	<input checked="" type="checkbox"/>	Habitats Regulations Assessment	<input type="checkbox"/>
Community Involvement Plan	<input type="checkbox"/>	Equalities Impact Assessment	<input type="checkbox"/>	Draft Policies Maps	<input type="checkbox"/>

### 3b. To which part does this representation relate?

Paragraph	<input type="text"/>	Policy SA	<input type="text" value="19 &amp; 20"/>	Draft Policies Map	<input type="text"/>
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### 4. Do you consider the Site Allocations DPD is:

4a. In accordance with legal and procedural requirements; including the duty to cooperate. Yes ☐ No ☐

4b. Sound Yes ☐ No ☒

### 5. With regard to each test, do you consider the Plan to be sound or unsound:

	Sound	Unsound
(1) Positively prepared	<input type="checkbox"/>	<input type="checkbox"/>
(2) Justified	<input type="checkbox"/>	<input type="checkbox"/>
(3) Effective	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(4) Consistent with national policy	<input type="checkbox"/>	<input type="checkbox"/>

**6b.** Please give details of why you consider the Site Allocations DPD is not legally compliant or is unsound. Please be as precise as possible.

We believe the Site Allocations DPD is **Unsound** as the inclusion of site SA19 is **not Effective**

SA19 has an allocation of 200 houses within a gross area of 8.5 hectares, thus an average density of 23.5 dph. However, approximately 2 hectares of the site lies within the EA non-climate change flood zone 3, this reduces the developable area and therefore increases the density on the available part of the site to 31 dph. The SA19 Policy states that it is 'to ensure all development avoids the flood extent for the 1 in 100 year event including climate change allowances', this is likely to further restrict the developable extent.

The Site Selection Criteria states the developable area of the site to only be 6 hectares, thus the density of development would be 33 dph.

Site SA19 is described as being 'sympathetic to the landscape setting and character of Felbridge' yet the existing density in this area of Felbridge is 14 dph and a density of 31-33 dph would be inappropriate for this location on the edge of the Village where the existing density is 14 dph, and would not comply with DG34 of the Mid Sussex Design Guide.

Additionally, the Site Selection Criteria conclusion states the 'potential to avoid adverse effects through reducing the density of the final scheme'. At a lower density this site would not deliver the allocated 200 houses and at a higher density would have significant adverse effects on Felbridge Village, local residents and amenity

At a density of 14 dph the 'developable 6 hectares' would only deliver 84 units.

The combination of the flood zone and the maximum appropriate housing density at the edge of the village would significantly reduce the deliverable units at this Site. Thus it is **not Effective** at delivering the 200 units allocated to it.

We believe the Site Allocations DPD is **Unsound** as the inclusion of site SA20 is **not Effective**

The Heritage England response to the Regulation 18 consultation was (our emphasis);

*We are particularly concerned about Policy SA20 Land south and west of Imberhorne Upper School, Imberhorne Lane, East Grinstead. In this case we are concerned that the effects on the setting of the adjacent GII\* Listed Buildings, Gullledge Farmhouse and Imberhorne Farm Cottages, The latter, in particular, has highly significant associations with the surrounding fields and agricultural landscape which were part of the medieval Lewes Priory holdings. The historical connection nor the visual interaction of buildings and landscape appear not to have not been fully assessed or taken account of in allocating the site. The scale and extent of the proposed housing and associated development in this area is likely to significantly impact on this relationship and the contribution it makes to the significance of the heritage assets. **We recommend that a Heritage Impact Assessment is undertaken prior to the finalisation of the draft DPD to determine the capacity of site** having taken into account the historic importance of the landscape to the setting of the listed buildings.*

Paragraph 194 of the NPPF states (our emphasis);

Any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification. Substantial harm to or loss of assets of the highest significance, notably scheduled monuments, protected wreck sites, registered battlefields, grade I and **II\* listed buildings**, grade I and II\* registered parks and gardens, and World Heritage Sites, **should be wholly exceptional**.

Both Imberhorne Farm and Gullege were important medieval rural farmsteads and Heritage England has clearly identified that development is likely to significantly impact upon these heritage assets. There is no evidence that the recommended Heritage Impact Assessment has been completed since the Regulation 18 consultation, thus it is not known how much of the proposed site is developable without significant harm upon the rural, historically open setting of these Grade II\* listed buildings.

Considering Heritage England's views regarding the potential harm, and in the absence of a Heritage Impact Assessment it is impossible to determine the extent of the proposed site that is developable. As such it is not proven that Site SA20 could deliver 550 housing units, it is therefore **not Effective**.

We believe the Site Allocations DPD is **Unsound** as the cross-boundary strategic matters identified in the statement of common ground (SoCG) have been deferred rather than dealt with, it is therefore **not Effective**.

The TDC-MSDC SoCG confirms that both parties confirm the necessity to implement highways improvements at four junctions on the A264 and A22. This project is called the 'A22/A264 corridor project'. Whilst financial contributions are sought from SA19 and SA20 towards the corridor project, the delivery of that project is not included within the Plan's infrastructure deliverables. The transport assessment does not include the benefits of the project and the source of the funding to complete the scheme has not been identified.

West Sussex Highways response to the consultation was '*The DPD should acknowledge the possibility that improvements may not be deliverable at the Felbridge junction.*' So even the Highway Authority is questioning the viability of delivering the junction improvements.

By excluding the 'corridor project' from the DPD and the transport assessments, the development of sites SA19 and SA20 could proceed, whilst Sussex and Surrey Highways may decide in the future that no viable scheme exists to really mitigate the already severe road network. This would lead to even more development burdening an already severe road network. Therefore the identified cross-boundary strategic matters have been deferred rather than dealt with, rendering the DPD **not Effective**.

**7.** Please set out what change(s) you consider necessary to make the Site Allocations DPD legally compliant or sound, having regard to the reason you have identified at question 5 above where this relates to soundness.

You will need to say why this change will make the Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.



We request that the following action is taken with respect to the draft Site Allocations DPD and associated documents:

Sites SA19 and SA20 should be withdrawn as there are sufficient reasons to believe they would be unable to deliver their allocations within the plan period.

In the event that the Inspector decides the DPD should progress to Examination then any allocations at East Grinstead or Felbridge should be made contingent on delivering a viable and meaningful set of junction improvements to mitigate the cumulative impact of local development since 2017.

**Please note** your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested change, as there will not normally be a subsequent opportunity to make further representations based on the original representation at publication stage.

**After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.**

8. If your representation is seeking a change, do you consider it necessary to attend and give evidence at the hearing part of the examination? (tick below as appropriate)

☒

**No**, I do not wish to participate at the oral examination

☐

**Yes**, I wish to participate at the oral examination

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

**Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

**10. Please notify me when:**

(i) The Plan has been submitted for Examination

☐

(ii) The publication of the recommendations from the Examination

☐

(iii) The Site Allocations DPD is adopted

☐

24<sup>th</sup> September 2020

## Part B Representation 6

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Name or Organisation:

Felbridge Parish Council

### 3a. Does your comment relate to:

Site Allocations DPD	<input checked="" type="checkbox"/>	Sustainability Appraisal	<input checked="" type="checkbox"/>	Habitats Regulations Assessment	<input type="checkbox"/>
Community Involvement Plan	<input type="checkbox"/>	Equalities Impact Assessment	<input type="checkbox"/>	Draft Policies Maps	<input type="checkbox"/>

### 3b. To which part does this representation relate?

Paragraph	<input type="text"/>	Policy SA	<input type="text" value="19 &amp; 20"/>	Draft Policies Map	<input type="text"/>
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### 4. Do you consider the Site Allocations DPD is:

4a. In accordance with legal and procedural requirements; including the duty to cooperate. Yes ☐ No ☐

4b. Sound Yes ☐ No ☒

### 5. With regard to each test, do you consider the Plan to be sound or unsound:

	Sound	Unsound
(1) Positively prepared	<input type="checkbox"/>	<input type="checkbox"/>
(2) Justified	<input type="checkbox"/>	<input type="checkbox"/>
(3) Effective	<input type="checkbox"/>	<input type="checkbox"/>
(4) Consistent with national policy	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**6b.** Please give details of why you consider the Site Allocations DPD is not legally compliant or is unsound. Please be as precise as possible.

We believe the Site Allocations DPD is **Unsound** as sites SA19 and SA20 do not deliver sustainable development in accordance with the policies in the NPPF and are therefore **Inconsistent with National Policy**.

### Non-Sustainable Transport Impacts

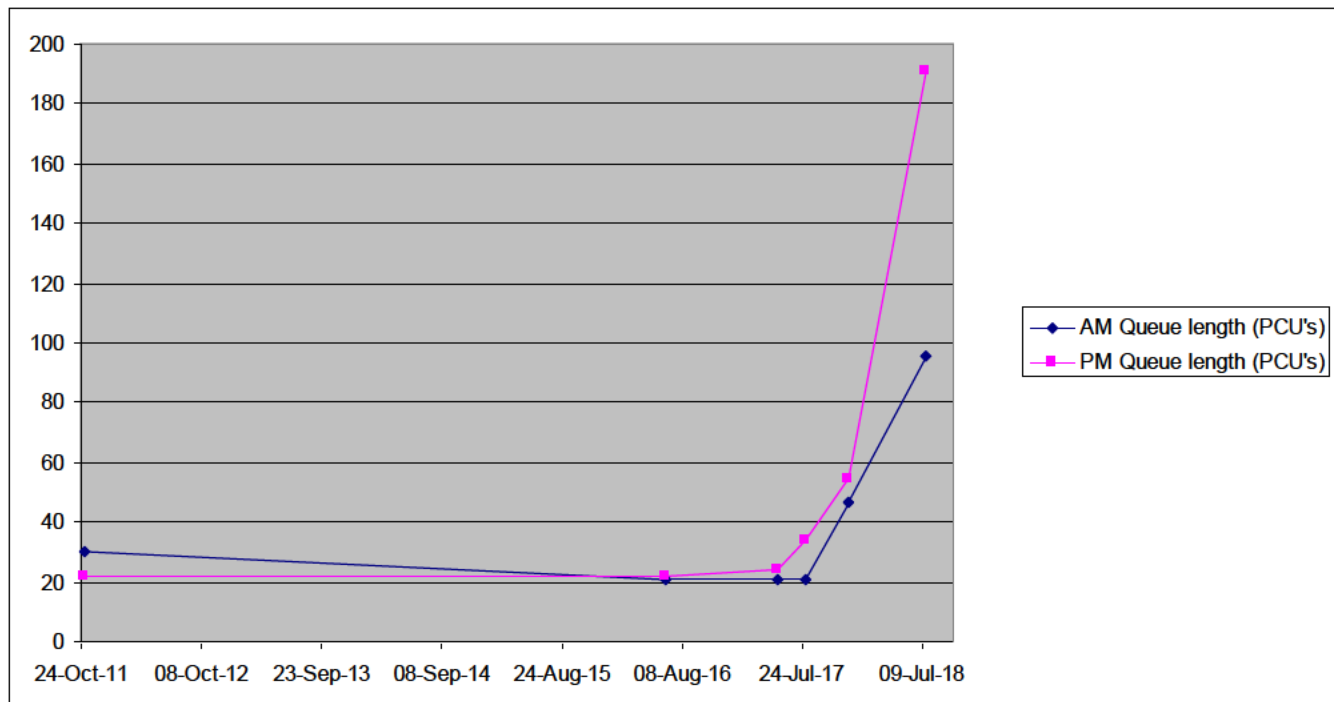
The local road network is already severe, and the impact of both sites (SA19 & SA20) will have a negative impact upon the junctions at The Star (A264/A22) and Imberhorne Lane/A22. The latest transport study jointly commissioned by MSDC and TDC identified that the A264/A22 junction is already operating at 107%. [see 'Part B Representation 3' above for the data].

The design criteria for signalised junctions is 90% saturation in the future year case. Yet here we have a junction that is already 17% above the design criteria in the base case with no transport mitigation proposed within the DPD. The junction has not always been severe, this is evidenced by the exponential growth in queue length observed by the transport studies since the middle of 2017.

Using a number of queue length surveys for the A264/A22 junction since 2011 up to 2018 it is possible to see the impact of increased traffic upon the Copthorne Road, the surveys are tabulated and graphed below.

Survey Date	Reference	AM Peak		PM Peak		Limit of visibility (LoV)	% of Peak hour readings where LoV was exceeded?
		Mean Queue length (PCU's)	DoS	Mean Queue length (PCU's)	DoS		
01-Nov-11	Atkins3	30	96	22	91		
22-Jun-16	Vectos	21	81	22	83.1	27	AM 17% PM 0%
10-May-17	iTransport	21	97.5	24	97.2	24	AM 10% PM 85%
03-Aug-17	BdR	21	90.2	34	85.2	35	AM 17% PM 75%
05-Dec-17	Hydrock	46.6	107	54.3	110	290m (~54 PCU's)	AM 58% PM 100%
17-Jul-18	TDC	95		191		1002m (~200 PCU's)	AM 19% PM 72%

Queue lengths in metres have been converted to PCU's assuming an average length of 5m/PCU.



The referenced surveys are;

Atkins<sup>3</sup> baseline survey adopted by WSCC and SCC.

Vectos<sup>4</sup> TA supporting the Hill Place Farm appeal APP/D3830/W/16/3142487.

iTransport<sup>5</sup> (paragraph 7.12.6) supporting TDC planning application TA/2017/1290

BdR queue length survey provided to SCC for TDC planning application TA/2016/2319.

Hydrock<sup>6</sup> survey supporting Gibbshaven Farm Application MSDC DM/18/0157

TDC survey 17-19<sup>th</sup> July 2018.

All of the surveys were conducted over a single day, except for the TDC survey which was over 3 consecutive days and therefore the average of all 3 days has been used above.

The December 2011 Technical Note<sup>7</sup> (Section 5.1) attached to the Atkins3 study provides the following background information regarding junction analysis of the A22 junctions with the A264 and Imberhorne Lane;

*The LinSig models were developed to evaluate the queue lengths, delays, and Degree of Saturation (DoS) at both junctions. Degree of Saturation (DoS) is a quantitative analysis of the level of congestion on the network and is used as the primary indicator of the operational performance of the junction. Generally, when a junction reaches 90 percent DoS it is considered to be at practical capacity and when it reaches 100 percent, at theoretical capacity.*

*The relationship between queues and DoS is such that queues begin to increase exponentially at high DoS (>85%). At junctions operating close to the zero practical reserve capacity, even small reductions in capacity can result in a significant increase in queuing and delay.*

<sup>3</sup> <https://www.eastgrinstead.gov.uk/i/uploads/2012/07/east-grinstead-traffic-management-study-stage-3-final-report.pdf>

<sup>4</sup> <http://194.165.12.101/AniteIM.WebSearch/Download.aspx?ID=456239>

<sup>5</sup> <http://194.165.12.101/AniteIM.WebSearch/Download.aspx?ID=515251>

<sup>6</sup> <http://194.165.12.101/AniteIM.WebSearch/Download.aspx?ID=554996>

<sup>7</sup> <http://www.eastgrinstead.gov.uk/i/uploads/2012/07/east-grinstead-traffic-management-study-stage-3-final-report-appendix-b.pdf>

*The queue length results presented in the tables above show a good comparison between the observed and the modelled queues at both junctions. The modelled queue on Copthorne Road appears higher than the observed queue for both peak periods; however it was apparent from site visits that this queue extended quite far back and the surveyor was not able to count vehicles stretching this far (i.e. beyond 100 metres).*

The Peak Hour manual car counts for all of the 2017/18 surveys vary within only a 5% range despite significant differences in the observed queue lengths. This lack of variation demonstrates the junction is already operating at/over capacity and as such it is impossible for an increased number of vehicles to pass through it within the hour.

The behaviour of the queue and the increasing Degree of Saturation (DoS) is exactly as expected, the junction was already identified as being over 107% saturation in December 2017, thus with additional traffic flow the junction cannot cope and the queue length increases exponentially.

The limit of visibility has a significant impact upon the results of the queue length studies. This limit is the maximum queue that can be observed using the method employed; if the queue is longer, then only the maximum length will be recorded as the surveyor is unable to see the end of the queue. This was discussed at the Hill Place Farm inquiry where it was identified that the Vectos survey had a limit of visibility of 27 vehicles. As seen in the table above, the Vectos survey queue length is likely to have been very close to the actual queue length as the limit of visibility was only reached 17% of the time in the AM peak, and not at all in the PM peak.

The subsequent surveys in 2017 all failed to see the back of the PM queue for the vast majority of the peak hour, even though these surveys are increasing their visibility limits. For the BdR survey supporting this application with a visibility limit of 35 vehicles, this visibility limit was exceeded for 75% of the readings in the PM peak hour. The rapid increase in congestion and thus queue length is demonstrated by the Hydrock survey in December 2017, even with a visibility limit of 54 vehicles it never saw the end of the queue for the whole of the PM peak hour, thus the queue must always have been longer than 54 vehicles, but it is not known by how far.

The TDC survey in July 2018 extended the visibility limit much further to 1002m (approximately 200 vehicles) and over the three consecutive days it still failed to see the back of the queue 72% of the PM peak hour, and 19% of the AM peak hour.

The TDC survey also shows that the congestion is not only for short periods of the day, with queues on the Copthorne Road exceeding 100m for 90% of the whole survey period 0700-1000 & 1500-1900, and on most days it was above 100m for the first and last reading of each AM/PM period indicating that this level of congestion probably extends beyond the 7 hours per day that were being recorded.

The DPD strategic transport assessment for Regulation 19 [T7] discusses the A22/A264 junction [para 6.1.3-6.1.6];

The highway model allows travellers to change their route due to congestion to achieve the most cost-effective journey possible. It can be seen in the Reference Case that significant rerouting is occurring away from the A264/A22 in both the AM and PM peak, and this continues in the Scenarios. The alternative route favoured by the model is via the B2028 and B2110 through Turners Hill. It is mostly trips going to East Grinstead area south of the A22, including Imberhorne Lane that do this.

Once the model reaches capacity at a location, delay will increase significantly and extensive rerouting will occur if alternative faster routes are available. Traffic heading to the Imberhorne Lane development from the west will, according to the model, route via the B2110 through Turners Hill, rather than experience the delays on the A264 particularly at the junction with the A22 at Felbridge. Online journey planners suggest this is perhaps already the quicker route in the PM peak for Imberhorne and other destinations south of the A22 in the East Grinstead area. It is apparent that in the PM peak, for journeys from the west to the Imberhorne Lane development, most of the scenario traffic is rerouting from the A264. It is difficult to put an exact figure on this because it varies depending on origin and journey length.

The PM peak model shows increases of up to around 150 vehicles on the B2028 through Crawley Down towards Turner's Hill and about 100 additional vehicles travelling east on the B2110 at Turner's Hill towards Imberhorne Lane. This is a mix of traffic relating to the Imberhorne site, the smaller sites in the north of the District and re-routed traffic from the Reference Case avoiding the A264.

It is clear from these statements that 'rat running' through rural roads and residential streets is already occurring due to the severe congestion at the Star junction, and that the DPD predicts this will increase as a result of the Imberhorne Lane site (SA20). It is not a sustainable transport strategy to rely upon unsuitable rural roads and residential streets to handle the additional traffic resulting from a proposed site just because the A-road network has exceeded its capacity.

The DPD Transport Assessment attributes the severe capacity issues to houses already allocated by the 2018 District Plan and argues that the impact of the proposed DPD allocations taken separately is not sufficient to trigger the National Policy 'residual cumulative impact' test.

NPPF paragraph 109 states that "Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe."

We contest that the impact of traffic from sites proposed in the Site Allocations DPD cannot be treated independently from the impact of other sites allocated in the Local Development Plan. MSDC argue that traffic generated by the Local Development Plan is an 'existing situation' and can be ignored when applying the 'residual cumulative' test. This cannot be the intended interpretation of NPPF Paragraph 109.

NPPF paragraph 108 states that "In assessing sites that may be allocated for development in plans, or specific applications for development, it should be ensured that: any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree."

There are no confirmed viable proposals for highway interventions in the Site Allocation DPD or Sustainability Appraisal to mitigate the impact of the proposed sites SA19 and SA20, either alone or in combination with sites already committed in the Local Development Plan. **This Site Allocation DPD is therefore in conflict with NPPF Paragraphs 108 and 109.**

### **High reliance upon car based transport**

The DPD repeatedly states that East Grinstead is a Category 1 settlement, however the sustainability assessment fails to account for the fact that site SA19 lies outside the settlement of East Grinstead and

the SA19 Housing Allocation Policy states that the objective of this site is ‘to deliver a sympathetic extension to Felbridge’, ‘sympathetic to the landscape setting and character of Felbridge’ and ‘maximises connectivity with the existing settlement of Felbridge’.

Felbridge is a Tier 3 rural village in Tandridge District, Surrey it is defined as a rural settlement in the Green Belt with 532 dwellings within the built-up area of the Village Boundary. As a rural village, Felbridge has no doctor surgeries, pharmacy, dentist, opticians or any other such infrastructure. Due to the County and District Council process for handling infrastructure contributions resulting from development, not a single pound of funding has been contributed to any Surrey facilities or to fund any infrastructure improvements within Felbridge Village from the 120 Mid Sussex houses recently granted consent or any previous approvals.

Thus, whilst proposed site SA19 will provide a significant financial contribution it will not provide any improvement in infrastructure within the village that it states is being extended by the proposal, and without local infrastructure within a walkable distance the proposed dwellings will be highly reliant upon vehicular transport.

We therefore believe that **Site SA19** does not minimise the number and length of journeys needed for employment, shopping, leisure, education and other activities and is therefore **in conflict with NPPF Paragraph 104(a)**

#### **Lack of associated Employment space**

The Sustainability reviews of the proposed sites in East Grinstead (SA18, SA19 and SA20) fail to consider the employment opportunities and the process is therefore flawed as it has not considered how these sites will comply with Policy DP1.

DP1: Sustainable Economic Development Strategic Objectives:

7) To promote a place which is attractive to a full range of businesses, and where local enterprise thrives

8) **To provide opportunities for people to live and work within their communities, reducing the need for commuting.**

The DPD has provided no new employment allocations within Felbridge or East Grinstead associated with the 772 dwellings proposed within that area. Further to the absence of new employment allocations, there has also been significant loss of local employment space following the conversion of many office buildings within East Grinstead into dwellings.

A key finding of the Mid Sussex Economic Profile Study (2018) is “There has been a significant loss of floor space to residential conversions particularly in East Grinstead.” This study reports 19,440m<sup>2</sup> of commercial office space in East Grinstead. Since then East Grinstead’s stock of office space has continued to decline, with 12,000m<sup>2</sup> (62%) being lost as a result of a single planning permission for the conversion of East Grinstead House in July 2020 [DM/20/2520]. The East Grinstead Business Association objected to the conversion “we have lost seven existing, long standing, large and well known successful local businesses that have live leases and in combination employ around 1,000 people”. The conversion will yield another 253 homes, with potentially double the number of new residents needing to commute out of East Grinstead for work

Without additional local employment opportunities, these sites in East Grinstead will all lead to an increased need for commuting contrary to District Policy DP1. We therefore believe that both **Sites**

**SA19 and SA20** do not minimise the number and length of journeys needed for employment and are therefore **in conflict with NPPF Paragraph 104(a)**.

In addition, the lack of additional local employment opportunities fails to support a sustainable community, with sufficient access to services and employment opportunities ... in larger towns to which there is good access **in conflict with NPPF Paragraph 72(b)**.

7. Please set out what change(s) you consider necessary to make the Site Allocations DPD legally compliant or sound, having regard to the reason you have identified at question 5 above where this relates to soundness.

You will need to say why this change will make the Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

We request that the following action is taken with respect to the draft Site Allocations DPD and associated documents:

Site SA19 should be withdrawn as it is in conflict with NPPF Paras 72b, 104a, 108 & 109

Site SA20 should be withdrawn as it is in conflict with NPPF Paras 72b, 108 & 109

By excluding the 'corridor project' from the DPD and the transport assessments, the possibility exists that Sussex and Surrey Highways may decide in the future that no viable scheme exists to really mitigate the already severe road network but the development of sites SA19 and SA20 could still proceed. This would lead to even more development burdening an already severe road network. Therefore, the identified cross-boundary strategic matters have been deferred rather than dealt with, rendering the DPD **not Effective**.

**Please note** your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested change, as there will not normally be a subsequent opportunity to make further representations based on the original representation at publication stage.

**After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.**

8. If your representation is seeking a change, do you consider it necessary to attend and give evidence at the hearing part of the examination? (tick below as appropriate)

☒

**No**, I do not wish to participate at the oral examination

☐

**Yes**, I wish to participate at the oral examination

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

**Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.



**10. Please notify me when:**

- (i) The Plan has been submitted for Examination
- (ii) The publication of the recommendations from the Examination
- (iii) The Site Allocations DPD is adopted

☐☐☐

Signature:



Date:

24<sup>th</sup> September 2020

## Site Allocations DPD: Regulation 19 Consultation Response

**Policy:** SA20

**ID:** 584

**Response Ref:** Reg19/584/3

**Respondent:** Mr R Whalley

**Organisation:**

**On Behalf Of:**

**Category:** Resident

**Appear at Examination?** x

<b>Name</b>	Robin Whalley
<b>Address</b>	[REDACTED]
<b>Phone</b>	[REDACTED]
<b>Email</b>	[REDACTED]
<b>Name or Organisation</b>	Robin Whalley
<b>Which document are you commenting on?</b>	Site Allocations DPD
<b>Sites DPD Policy Number (e.g. SA1 - SA38)</b>	SA19 - Land South of Crawley Down Road
<b>Do you consider the Site Allocations DPD is in accordance with legal and procedural requirements; including the duty to cooperate</b>	No
<b>(1) Positively prepared</b>	Unsound
<b>(2) Justified</b>	Unsound
<b>(3) Effective</b>	Unsound
<b>(4) Consistent with national policy</b>	Unsound

**Please outline why you either support or object (on legal or soundness grounds) to the Site Allocations DPD**

I would initially question the soundness of the very substantial allocation of housing to East Grinstead, bearing in mind the following:

- a) There has been no recent assessment of the true demand side of the equation, first of all by District (ie Mid Sussex) then specifically by smaller communities ie East Grinstead.
- b) The Mid Sussex District Plan is 2 years old (at least if you count the number of times it was issued and reissued), so should not the real current housing demand be reassessed?
- c) The economic climate following the COVID-19 pandemic has drastically altered, particularly in the Crawley-Gatwick area following the withdrawal of British Airways and Virgin Atlantic. This had led to substantial job losses both directly (over 5,000) and indirectly, which must affect the local housing needs.
- d) The lack of uptake of apartments and flats in East Grinstead (there are many which have been unsold for over two years) must indicate that the demand side analysis is grossly wrong and should be re-evaluated with development space allocated based on local demand not simply on a rule of thumb based on land availability!!
- e) Demand for housing still exists in the Crawley area and satisfying this demand in East Grinstead would lead to increased commuting on already congested roads adding to an increase in local emission of greenhouse gasses.
- f) The infrastructure in East Grinstead is already stretched, particularly the road system around the A264/A22 where traffic queuing is frequent throughout the day. Doctors' surgeries are similarly working at capacity.
- g) Many employment opportunity spaces have been lost in East Grinstead already by their conversion to apartments many of which remain unoccupied. Additional housing will lead to more external commuting and more emissions of greenhouse gasses.
- h) The number of dwellings envisaged in the Draft Sites Allocation is disproportionately large for East Grinstead's population when compared with elsewhere in the Mid Sussex area.
- i) The use of East Grinstead to satisfy the demand for Crawley's housing needs will lead to East Grinstead becoming a suburb of Crawley and losing its market town heritage.
- j) It is not clear why alternative sites in and around Crawley for Crawley's future housing needs have not been fully explored.

This proposal for SA 19, together with SA 20 will add even more traffic to the congested A264/A22 junction at Felbridge. Despite many traffic studies over the years, no satisfactory solution has emerged to the existing bottleneck here. The acute angled junction with Crawley Down Road and the A264 is already a most difficult one and there seems little opportunity to improve it to deal with the increased traffic generated from this proposed development. The fact that the development would be in Mid Sussex and the road junction is in Surrey, with the highway authority being West Sussex adds layers of inevitable consultation, which will be needed if any improvements are to be designed.

Policy DP 20 and 21 of the Mid Sussex District Plan "adopted" in March 2018 require adequate transport infrastructure to be provided "...in the right place at the right time that supports development...". It is clear that both SA 19 and SA 20 will create further pressure on the transport infrastructure such that the road system would not adequately support the proposed development.

<p><b>Please set out what change(s) you consider necessary to make the Site Allocations DPD legally compliant or sound, having regard to the reason you have identified at question 5 above where this relates to soundness.</b></p>	<p>a) Recalculate the true demand for housing in East Grinstead having first reassessed the economic climate in the Crawley/Gatwick area following the withdrawal of British Airways and Virgin Atlantic and the closure of related businesses. Make due allowance for those empty flats, apartments and shops currently available in East Grinstead.</p> <p>b) Properly consider development sites closer to Crawley where the demand is greater and which if taken up, would reduce commuting time and thus atmospheric pollution.</p> <p>c) Design and implement a sound traffic improvement scheme for the A264/A22 junction at Felbridge which reduces the currently queuing. This would need to be combined with improved traffic management at the A22/ Imberhorne junction and generally on the A22 approaches to East Grinstead from the north.</p>
<p><b>If you wish to provide further documentation to support your response, you can upload it here</b></p>	
<p><b>If your representation is seeking a change, do you consider it necessary to attend and give evidence at the hearing part of the examination</b></p>	<p>No, I do not wish to participate at the oral examination</p>
<p><b>Please notify me when-The Plan has been submitted for Examination</b></p>	<p>yes</p>
<p><b>Please notify me when-The publication of the recommendations from the Examination</b></p>	<p>yes</p>
<p><b>Please notify me when-The Site Allocations DPD is adopted</b></p>	<p>yes</p>
<p><b>Date</b></p>	<p>23/09/2020</p>

## Site Allocations DPD: Regulation 19 Consultation Response

**Policy:** SA20

**ID:** 602

**Response Ref:** Reg19/602/4

**Respondent:** Mr J Beale

**Organisation:** East Grinstead Society

**On Behalf Of:**

**Category:** Organisation

**Appear at Examination?** x

## Site Allocations and Development Plan Document (DPD) - July 2020

### Response by The East Grinstead Society

We commented on the Draft of this plan in November 2019 and regret that so little has been varied in the ensuing period to July 2020.

As before our comments relate to both the general context of East Grinstead and the three specific sites in the DPD, SA18, SA19 and SA20. We end with some general conclusions

#### Context

Our start point is that we see no evidence of unmet demand for housing in East Grinstead when there is so much unfilled accommodation. We believe that there is an overwhelming view in the Town that it is necessary to protect its unique market town heritage and not let it slip further into being a satellite of Crawley. This view is not simply an unnecessarily negative response but one underpinned by serious and long recognised issues around traffic congestion and an inadequate local road system.

Regarding the general situation SA35 – Safeguarding of land for and Delivery of Strategic Highway Improvements – is of particular relevance. This effectively concedes that the developments now proposed in the DPD will cause unacceptable road congestion throughout the East Grinstead area without major road improvements. It identifies the land that should be safeguarded to support the delivery of transport schemes, particularly the A22/A264 corridor upgrades at Felbridge, Imberhorne Lane and Lingfield Road. It goes on to suggest that there will be a need for further consultations between MSDC, WSCC, and other relevant parties, presumably Surrey County Council and Tandridge District Council but particularly East Grinstead Town Council.

Considering the long history of the congestion issue and its continuing impact on the issue of development in and around East Grinstead it is wishful thinking in the extreme to offer consultation as a key to unlock the issue without any evidence of any chance of success this time.

**Thus until these consultations have taken place, a plan of action agreed and the works commenced it would appear to be imprudent to commence the housing developments envisaged in the DPD .**

There is a major omission from the proposed list of safeguarded land in SA35. This is the junction of the Crawley Down Road and the A264. The two roads meet at a very acute angle and we are led to understand that the green space at this junction which would apparently allow expansion of the junction is protected by the terms of a gift to the people of Felbridge so this is a non-starter as congestion mitigation.

#### Specific Sites

##### SA18 Police Station East Court

The site is adjacent to the East Court Mansion which is a listed building with a large conservation area around it. The existing parking facilities relate to the needs of the council offices and the hirers of the public buildings on the site. The private road that services these buildings is narrow and is only provided for visitors and not for through traffic. The junctions for this private

road with the public road network are not suitable for significant extra traffic. Any parking facilities required for this proposed development will have to be within the site and not spill over into the Mansion parking facilities. There is a childrens' playground close by which must be protected from the potential threat of through traffic.

Furthermore, we think there are some important underlying questions. What are the implications for the Old Court House which is joined to the Police Station and could it be incorporated into the scheme? Have any surveys been undertaken to study the stability of the land to ensure that the development would not slip into Blackwell Hollow?

#### SA19 Backland along Crawley Down Road

This proposal is complicated by the fact that the 200 houses would be in Mid-Sussex but the road access would be in Surrey. There is a well-filled primary school in Felbridge and an indifferent bus service but for all other services the inhabitants would have to look to East Grinstead. It has been established that to prevent coalescence of communities there should be no internal routes to connect the site with East Grinstead so access to these services would have to be by road using the road network referred to earlier in this note which has been recognised as unsatisfactory and congested. This is another problem for the joint councils working party on traffic mitigation to resolve before the housing scheme could be commenced.

#### SA20 Imberhorne Farm

This scheme for 550 houses has major implications for the road network. The scheme would be accessed by a substantial roundabout opposite Heathcote Drive on Imberhorne Lane. Imberhorne Lane will have to bear the pressure of traffic from the Hill Place Farm development on the Turners Hill Road, the Imberhorne and Garden Wood estates, traffic to and from Hazelden crossroads and, of course, that accessing the enlarged secondary school.

Regarding the enlarged secondary school much has been made of the benefit of combining the upper and lower portions. We look for clarification as to whether the proposal merely provides space for a school that caters for today's population or will there be adequate facilities for the children of these new developments as well?

### **General Conclusions**

We note that the DPD is based on the world as it existed when the District Plan was originally prepared and things have moved on since then. In consequence the needs of the area have altered substantially, the DPD has not.

We have little office space available due to permitted schemes (and do not know if such space will ever be in demand again), with office space changing into flats with further ones in prospect. Added to this may be redundant shops. Changing working practices may alter the demand and we cannot be certain that all the new housing is going to be filled, with current schemes yet to be filled.

We are concerned that the character of the Town will be sacrificed for an empty prize, leaving its residents with congestion and a Town that is a dormitory of Crawley but with a load of empty accommodation.



## Site Allocations DPD: Regulation 19 Consultation Response

**Policy:** SA20

**ID:** 666

**Response Ref:** Reg19/666/3

**Respondent:** Mrs J Holden

**Organisation:** East Grinstead Town Council

**On Behalf Of:**

**Category:** Town & Parish Council

**Appear at Examination?** x



# EAST GRINSTEAD TOWN COUNCIL

Council Offices, East Court, College Lane, East Grinstead, West Sussex, RH19 3LT

Web site: [www.eastgrinstead.gov.uk](http://www.eastgrinstead.gov.uk) E mail: [townclerk@eastgrinstead.gov.uk](mailto:townclerk@eastgrinstead.gov.uk)

Tel: (01342) 323636

**Town Clerk:** Mrs J W Holden EDMS, IRRV (Hons), Cert HE Comm Gov, PSLCC



INVESTOR IN PEOPLE

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Your Ref:

My Ref:

When calling please ask for: Mrs J Holden

24<sup>th</sup> September 2020

## Site Allocation DPD – Regulation 19 consultation

Thank you for the opportunity to consider the draft DPD further. The Council wish to refer back to our response of 20<sup>th</sup> November 2019. In addition to those earlier comments we would add the following:

Site SA18 - The Council again refer to paragraph 4.18 of the East Grinstead Neighbourhood Plan and feel strongly that the erosion of the community feel of the estate must be resisted. The inclusion of a built up area boundary on East Court is the start of further creep where this former private estate will erode to development and we very much object to the stating of a built up area boundary on East Court.

Site SA19 – This site remains of great concern as to coalescence between the Parish of East Grinstead and the neighbouring villages (EGNP EG2A). Being part of East Grinstead but being wholly consumed within the community of Felbridge where there is no proposed additional infrastructure means this development will be to the detriment of both East Grinstead and Felbridge.

Site SA20 - The Council acknowledge that if designated as a strategic site this will override the East Grinstead Neighbourhood Plan policy for this site to remain an open site. It is also recognised that the a development of this size will have significant impacts on the traffic and community facilities that it must be a condition that the infrastructure elements are all complete in tandem with phase 1 of the development should this site go ahead. This will be in line with the precedent set by the Northern Arc development in Burgess Hill and must be applied to all strategic development of significant size.

The Council has concerns as to the soundness of the plan having considered the transport studies. The SYSTRA plan that was undertaken by MSDC determined that the junctions around East Grinstead (we are specifically referring to the A264/ A22 junctions which will bear the load of the development in SA19 and SA20) will be over capacity under the current planned build. However the SYSTRA report also refers to the current capacity as being at 61% (AM peak) and 65% (PM Peak). Whilst the WSP report (executive report is published on the Tandridge DC website) quotes the current capacity as 106.6% (Peak AM) and

101.4% (Peak PM). If the WSP figures are accurate with the additional builds significant road mitigation will be necessary to accommodate the proposed sites. SA35 identifies land to be protected for future traffic corridor upgrades. We would contend these need to be identified to come forward in the life of this plan to mitigate proposed developments and should include Imberhorne Lane as a whole.

The Council further acknowledge with thanks, the removal of the Old Court House from SA34 and Appendix A.

Yours sincerely

Julie Holden  
Town Clerk  
East Grinstead Town Council

## Site Allocations DPD: Regulation 19 Consultation Response

**Policy:** SA20

**ID:** 668

**Response Ref:** Reg19/668/1

**Respondent:** Mr A Byrne

**Organisation:** Historic England

**On Behalf Of:**

**Category:** Statutory Consultee

**Appear at Examination?** x



Historic England

[REDACTED]  
[REDACTED]  
Mid Sussex District Council  
Oaklands, Oaklands Road  
Haywards Heath, West Sussex, RH16 1SS

Our ref: PL00627206  
Your ref:  
Telephone 020 7973 3700  
Email [e-seast@historicengland.org.uk](mailto:e-seast@historicengland.org.uk)  
Date 30 September 2020

Dear [REDACTED]

### Mid Sussex DC Site Allocations DPD – Regulation 19 Consultation

Further to our letter of 19 November 2019 and our subsequent exchange of emails, I can confirm that Historic England has considered the changes made to the draft DPD in the light of Historic England's representations on the draft Site Allocations DPD at Regulation 18 stage.

We note and welcome the steps taken throughout the site selection process to assess potential sites for heritage impacts as set out in your email of 15 July 2020, which details the site selection assessment process. We note also that the Council's conservation officer has been involved throughout the preparation of the Site Allocation DPD, and has advised on the potential impacts of development on heritage assets. This addresses our representation on this matter and ameliorates our concern in this respect, and we are satisfied that appropriate weight has been given to the heritage impacts of site allocations throughout the site selection process.

In relation to the specific concerns raised in relation to the site allocation at Imberhorne Farm (SA20), I can confirm that Historic England has been involved in discussions on this major site with the site promoter and is encouraged by the suggestions being made with regard to changes to the masterplan to lessen the impact on the setting of heritage assets. While there may be some issues still to address in relation to the proposals for this site, we are content that as far as they relate to our previous representations on the draft Site Allocations DPD, that the site can be allocated and the significances of the affected heritage assets protected. Further detailed discussion will continue with the site promoter and the council to ensure the most beneficial outcome is achieved for the heritage through the site planning process.

I note and welcome also the change in the text within **SA GEN: General Principles for Site Allocations** by the addition of the section headed **Historic environment and cultural heritage** to reinforce the direct relationship between the Site Allocations policies and the



Historic England, 4th Floor, The Atrium, Cannon Bridge House, 25 Dowgate Hill, London EC4R 2YA  
Telephone 020 7973 3700 [HistoricEngland.org.uk](http://HistoricEngland.org.uk)

Please note that Historic England operates an access to information policy.

Correspondence or information which you send us may therefore become publicly available.





Historic England

requirements of the relevant policies in the District Plan relating to archaeology and heritage assets and the assessment of potential impacts of site development on them.

These comments are based on the information provided by you at this time and for the avoidance of doubt does not reflect our obligation to advise you on, and potentially object to, any specific development proposal which may subsequently arise from this or later versions of the plan and which may, in our view, have adverse effects on the historic environment.

*Yours sincerely*

*Alan Byrne*  
Historic Environment Planning Adviser



Historic England, 4th Floor, The Atrium, Cannon Bridge House, 25 Dowgate Hill, London EC4R 2YA  
Telephone 020 7973 3700 [HistoricEngland.org.uk](http://HistoricEngland.org.uk)

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## Site Allocations DPD: Regulation 19 Consultation Response

**Policy:** SA20

**ID:** 710

**Response Ref:** Reg19/710/5

**Respondent:** Mr N Burns

**Organisation:** Natural England

**On Behalf Of:**

**Category:** Statutory Consultee

**Appear at Examination?** x

Date: 28 September 2020  
Our ref: 324095



Planning Policy  
Mid Sussex District Council  
Oaklands  
Oaklands Road  
Haywards Heath  
West Sussex  
RH16 1SS

Customer Services  
Hornbeam House  
Crewe Business Park  
Electra Way  
Crewe  
Cheshire  
CW1 6GJ

T 0300 060 3900

**BY EMAIL ONLY**

Dear Sir / Madam

**Planning consultation: Mid Sussex District Council Site Allocations DPD - Regulation 19 Consultation**

Thank you for your consultation on the above dated 03 August 2020 which was received by Natural England on the same day.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Natural England welcomes the approach taken by your authority to consult with Natural England at various stages in the preparation of the Site Allocations Development Plan Document. We are pleased that our engagement has resulted in our comments/concerns being addressed in this version of the plan. In particular, we welcome the positive engagement by Mid Sussex District Council with both Natural England and the High Weald AONB Unit in the assessment of the Regulation 19 proposed site allocations within the High Weald Area of Outstanding Natural Beauty (AONB).

From this assessment, we recognise and welcome that a conclusion has been reached that none of the proposed site allocations (Policies SA7, SA8, SA25, SA26, SA27, SA28, SA29, SA32) constitutes major development within the AONB.

Our comments on your Regulation 19 Site Allocations Development Plan Document (DPD) Site allocations and development policies, followed by general comments are as follows.

**Comments on specific allocations**

**SA 7 - Cedars, Brighton Road, Pease Pottage**

We support the requirement of this allocation to undertake a Landscape and Visual Impact Assessment (LVIA) to consider potential impacts on the special qualities of the High Weald AONB.

**SA 8 - Pease Pottage Nurseries, Brighton Road, Pease Pottage**

We support the requirement of this allocation to undertake a Landscape and Visual Impact Assessment (LVIA) to consider potential impacts on the special qualities of the High Weald AONB.

We also support the requirements regarding nearby ancient woodland in line with Natural England's [standing advice](#).



**SA 18 - Former East Grinstead Police Station, College Lane, East Grinstead**

We recommend a requirement be included for this development to contribute to the existing strategic solution in accordance with District Plan Policy **DP17: Ashdown Forest SPA and SAC**.

**SA 19 – Land south of Crawley Down Road, Felbridge**

We recommend a requirement be included for this development to contribute to the existing strategic solution in accordance with District Plan Policy **DP17: Ashdown Forest SPA and SAC**.

We support the requirement of this allocation to provide suitable SuDS and greenspace to address potential impacts on the Hedgecourt Lake SSSI.

**SA 20 – Land south and west of Imberhorne Upper School, Imberhorne Lane, East Grinstead**

We support the requirements of this allocation to provide an appropriately managed strategic Suitable Alternative Natural Greenspace (SANG) to mitigate increased recreational disturbance on Ashdown Forest Special Protection Area (SPA) and Special Area of Conservation (SAC); such a SANG proposal must be considered in accordance with District Plan Policy **DP17: Ashdown Forest SPA and SAC**.

We also support the requirement for potential impacts of development on Hedgecourt Lake SSSI to be understood and adequately mitigated.

We also support the requirements regarding nearby ancient woodland in line with Natural England's [standing advice](#).

**SA 22 – Land north of Burleigh Lane, Crawley Down**

We recommend a requirement be included for this development to contribute to the existing strategic solution in accordance with District Plan Policy **DP17: Ashdown Forest SPA and SAC**.

**SA 25 – Land west of Selsfield Road, Ardingly**

We recommend a requirement be included for this development to contribute to the existing strategic solution in accordance with District Plan Policy **DP17: Ashdown Forest SPA and SAC**.

We support the requirements of this allocation to undertake a LVIA to consider potential impacts on the special qualities of the High Weald AONB.

**SA 26 – Land south of Hammerwood Road, Ashurst Wood have**

We recommend a requirement be included for this development to contribute to the existing strategic solution in accordance with District Plan Policy **DP17: Ashdown Forest SPA and SAC**.

We support the requirements of this allocation to undertake a LVIA to consider potential impacts on the special qualities of the High Weald AONB.

**SA 27 – Land at St. Martin Close, Handcross**

We support the requirements of this allocation to undertake a LVIA to consider potential impacts on the special qualities of the High Weald AONB.

**SA 28 – Land South of The Old Police House, Birchgrove Road, Horsted Keynes**

We recommend a requirement be included for this development to contribute to existing strategic solution in accordance with District Plan Policy **DP17: Ashdown Forest SPA and SAC**.

We support the requirements of this allocation to undertake a LVIA to consider potential impacts on the special qualities of the High Weald AONB.

**SA 29 – Land south of St. Stephens Church, Hamsland, Horsted Keynes**

We recommend a requirement be included for this development to contribute to the existing strategic solution in accordance with District Plan Policy **DP17: Ashdown Forest SPA and SAC**.

We support the requirements of this allocation to undertake a LVIA to consider potential impacts on the special qualities of the High Weald AONB.

### **SA 32 – Withypitts Farm, Selsfield Road, Turners Hill**

We recommend a requirement be included for this development to contribute to the existing strategic solution in accordance with District Plan Policy **DP17: Ashdown Forest SPA and SAC**.

We support the requirements of this allocation to undertake a LVIA to consider potential impacts on the special qualities of the High Weald AONB.

## **Comments on Development Policies**

### **SA38: Air Quality**

Whilst we support the requirement of this policy for applicants to demonstrate there is not an unacceptable impact on air quality resulting from their proposals we recommend the following change in wording to strengthen the protection of designated sites.

*“Development proposals that are likely to have an impact on local air quality, including those in or within relevant proximity to existing or potential Air Quality Management Areas (AQMA)s or **designated nature conservation areas sensitive to changes in air quality**, will need to demonstrate measures/ mitigation that are incorporated into the design to minimise any impacts associated with air quality.*

We recognise there is specific wording established for air quality impacts for Ashdown Forest and this suggestion is additional for any other relevant sites which could be potentially impacted by changes to air quality.

## **General comments**

### **Biodiversity net gain**

We strongly support the requirements of all allocations to ensure there is a net gain to biodiversity as well as the general principle for site allocations to: *“Conserve and enhance areas of wildlife value and ensure there is a net gain to biodiversity, using the most up-to-date version of the Biodiversity Metric. Avoid any loss of biodiversity through ecological protection and enhancement, and good design. Where it is not possible, mitigate and as a last resort compensate for any loss. Achieve a net gain in biodiversity (measured in accordance with Government guidance and legislation), for example, by incorporating new natural habitats, appropriate to the context of the site, into development and designing buildings with integral bat boxes and bird nesting opportunities, green/brown roofs and green walling, in appropriate circumstances in accordance with District Plan Policy”.*

We would still however recommend that your DPD should include requirements to monitor biodiversity net gain. This should include indicators to demonstrate the amount and type of gain provided through development. The indicators should be as specific as possible to help build an evidence base to take forward for future reviews of the plan, for example the total number and type of biodiversity units created, the number of developments achieving biodiversity net gains and a record of on-site and off-site contributions.

We recommend that Mid Sussex District Council works with local partners, including the Local Environmental Record Centre and Wildlife Trusts, to share data and consider requirements for long term habitat monitoring. Monitoring requirements should be clear on what is expected from landowners who may be delivering biodiversity net gains on behalf of developers. This will be particularly important for strategic housing allocations, and providing as much information on monitoring upfront as possible will help to streamline the project stage.

## **Water efficiency**

Your Authority contains areas of Serious Water Stress as designated by the Environment Agency. For developments in Southern Water Services drinking water supply area Natural England recommends water efficiency policies should be developed to support Southern Water's "Target 100".

This target, of 100 litres per person per day by 2040 has been identified by Southern Water to avoid the need for water supply options that are likely to damage biodiversity or/and effect protected landscapes. For development in other companies' supply areas Natural England supports the Environment Agency's recommendation of a maximum of 110 litres per person per day.

Water efficiency measures will help reduce the current impact of water resources on the natural environment and thereby contribute to more resilient landscapes and seas, one of the aims in Natural England's 'Building partnerships for nature's recovery: Action Plan 2020/21'<sup>1</sup>. Reducing the water we use will also contribute to the Government's 25 Year Environment Plan aspirations for clean and plentiful water and to restore sustainable abstraction.

### **Soil**

Soil is a finite resource, and fulfils many roles that are beneficial to society. As a component of the natural environment, it is important that soils are protected and used sustainably.

The DPD should recognise that development (soil sealing) has a major and usually irreversible adverse impact on soils. Mitigation should aim to minimise soil disturbance and to retain as many ecosystem services as possible through careful soil management during the construction process.

Soils of high environmental value (e.g. wetland and carbon stores such as peatland) should also be considered to contribute to ecological connectivity, as such these soils should be conserved and protected from negative impacts.

We recommend that allocation policies refer to the [Defra Code of practice for the sustainable use of soils on construction sites](#).

### **Comments on HRA**

Natural England notes that your authority, as competent authority, has undertaken an appropriate assessment of this DPD in accordance with regulation 63 of the Conservation of Species and Habitats Regulations 2017 (as amended). Natural England is a statutory consultee on the appropriate assessment stage of the Habitats Regulations Assessment process.

Your appropriate assessment concludes that your authority is able to ascertain that the implementation of this DPD will not result in adverse effects on the integrity of any of European sites in question.

Having considered the assessment, and the measures proposed to mitigate for all identified adverse effects that could potentially occur as a result of the proposal, chiefly changes in air quality and increased recreational disturbance, Natural England advises that we concur with the assessment conclusions, providing that all required mitigation measures are appropriately secured in any future planning permissions given.

### **Comments on SA**

We have no specific comments to make regarding our statutory remit and your sustainability appraisal.

If you have any queries relating to the advice in this letter please contact me on 07554226006 OR 02080266551.

---

<sup>1</sup> [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/906289/natural-england-action-plan-2020-21.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/906289/natural-england-action-plan-2020-21.pdf)

Should the DPD change significantly, please consult us again.

Yours faithfully

Nathan Burns  
Area Team 14 - Kent and Sussex

## Site Allocations DPD: Regulation 19 Consultation Response

**Policy:** SA20

**ID:** 713

**Response Ref:** Reg19/713/3

**Respondent:** Mrs H Hyland

**Organisation:** Environment Agency

**On Behalf Of:**

**Category:** Statutory Consultee

**Appear at Examination?** x

<b>Name</b>	Hannah Hyland
<b>Job title</b>	Planning Specialist
<b>Organisation</b>	Environment Agency
<b>Address</b>	Environment Agency Oving Road Chichester West Sussex PO20 0AG United Kingdom
<b>Email</b>	hannah.hyland@environment-agency.gov.uk
<b>Name or Organisation</b>	Environment Agency
<b>Which document are you commenting on?</b>	Site Allocations DPD
<b>Sites DPD Policy Number (e.g. SA1 - SA38)</b>	SA20 - Land South and West of Imberhorne Upper School, East Grinstead
<b>Do you consider the Site Allocations DPD is in accordance with legal and procedural requirements; including the duty to cooperate</b>	Yes
<b>(1) Positively prepared</b>	Sound
<b>(2) Justified</b>	Sound
<b>(3) Effective</b>	Sound
<b>(4) Consistent with national policy</b>	Sound
<b>Please outline why you either support or object (on legal or soundness grounds) to the Site Allocations DPD</b>	<p>We support the requirements in relation to flood risk management and in particular the reference to natural flood risk management techniques being integrated into the layout and design of the development.</p> <p>We are also pleased to see that historic landfill site to the south east located around Imberhorne Farm has been identified.</p>
<b>If you wish to provide further documentation to support your response, you can upload it here</b>	
<b>If your representation is seeking a change, do you consider it necessary to attend and give evidence at the hearing part of the examination</b>	No, I do not wish to participate at the oral examination
<b>Date</b>	23/09/2020

## Site Allocations DPD: Regulation 19 Consultation Response

**Policy:** SA20

**ID:** 717

**Response Ref:** Reg19/717/2

**Respondent:** Mr R Tullett

**Organisation:** Sussex Area Ramblers Association

**On Behalf Of:** Sussex Area Ramblers Association

**Category:** Organisation

**Appear at Examination?** x

## Comments on Mid Sussex DC draft Site Allocations DPD – September 2020

### Submitted by Sussex Area Ramblers Association

These comments relate to East Grinstead Sites SA19 and SA20 only

#### Land south of Crawley Down Road (SA19)

Surface improvements are required to PROW 40aEG that passes through this site, to enable this route to provide access for walkers, cyclists and horseriders from Felbridge to Worth Way and East Grinstead. Permeability for non-car users will be key to delivering sustainable travel objectives.

#### Imberhorne Farmlands (SA20)

Sussex Ramblers strongly objects to the inclusion of this site in the Site Allocations DPD.

1. **Loss of valuable landscape** - An ancient bridleway (PROW 44bEG) runs through the open, historic arable landscape of this site, with extensive views over to the North Downs and Greensand ridge. While the impact on the site's Listed Buildings is acknowledged in the site assessment, the value of the wider historic landscape seems to be underappreciated.
2. **Loss of Biodiversity and other Sustainability issues** - This is the only development site in the DPD to involve significant loss of grade 3 arable land. Given the history of cropping on these fields, it is likely that at least some of the land is Grade 3a, and therefore should be protected from development under District Plan DP12 because of its "economic importance and geological value."  
This is one of the best sites in north Mid Sussex to see and hear many farmland bird species, including Skylark and Yellowhammer, both currently Red List species. In terms of biodiversity, the draft DPD only seems to consider designated wildlife sites and protected landscapes as having value; this does not comply with the District Plan e.g. DP38 ... "The District Plan recognises the importance of protection and conservation of areas outside designated areas where they are of nature conservation value.....especially where they contribute to wider ecological networks."

Since 1990s, we believe Imberhorne Farm has benefitted from inclusion in the DEFRA Countryside Stewardship Scheme; the majority of this site comprises arable land with hedgerows, drainage ditches, wide field margins and it is bordered by ancient woodland to the north. Development of this site cannot be carried out in a way that accommodates the existing biodiversity, in particular the valuable farmland bird populations. This is indeed acknowledged in the Developer's own Ecological Report where it is accepted that if the development proceeds in this form, the loss of Skylark habitat cannot be prevented and cannot be mitigated. However, on page 59 of the MSDC Sustainability Appraisal, the impact on Biodiversity of the whole programme of sites is scored as "neutral", on the basis that the loss of biodiversity will be mitigated on all sites. Yet the addition of one more site, a redundant Golf course, is deemed to score a double negative for biodiversity loss, with no evidence of real threat provided.



On Page 88 of the Sustainability Appraisal, Site SA20 must surely be given a double negative score for biodiversity, and also a double negative score for countryside impact to reflect the value that local people attach to this landscape, which was set out in detail in the East Grinstead Neighbourhood plan policy SS8.

3. **Impact on Ashdown Forest** - This site lies within the Ashdown Forest 7km Zone of influence. The PROW network through SA20 is very well used by ramblers, dog walkers and cyclists from East Grinstead, providing a varied “all weather” circular route out to Gullege and back along Worth Way. The pleasure of the long, open views over the farmland to the North Downs will be lost through development – Sussex Ramblers believes that walkers may be diverted to other open landscape in the area, including the Ashdown Forest. This will of course involve a car journey rather than a walk.

The proposed SANG provision to the west of the site will not be conveniently located for existing East Grinstead residents, most of whom will be well over a 2km walk away. We think therefore that many residents will only visit by car, not meeting sustainable travel objectives, and for East Grinstead residents it will not replace the recreational opportunities lost by development of the site.

We do not believe that the effectiveness of SANG mitigation required by District Plan policy DP17 has been demonstrated by evidence that would allow the scale of development set out in SA20.

4. **Contrary to Existing policy**

The case against major development on the Imberhorne Farmlands is set out in some detail in the East Grinstead Neighbourhood Plan – Policy SS8 and para 9.16.in particular. We note that in the detailed assessment ID770 the existence of this NP policy is not even mentioned in the comment on the Neighbourhood Plan compliance!

The draft DPD therefore does not accord with the Neighbourhood plan.

The proposed development SA20 does not meet the requirements of District Plan policies DP12, DP13, DP17, DP22 and DP38 and others.

## **Conclusion**

**Sussex Ramblers believes that the negative impact of development of Site SA20 means that the Site should be withdrawn from the draft DPD. Alternative sites should be considered to meet the District Plan targets.**

## Site Allocations DPD: Regulation 19 Consultation Response

**Policy:** SA20

**ID:** 738

**Response Ref:** Reg19/738/1

**Respondent:** Ms K Lamb

**Organisation:** DMH Stallard

**On Behalf Of:** Welbeck - Imberhorne

**Category:** Promoter

**Appear at Examination?** ✓

VISION DOCUMENT | SEPTEMBER 2020

LAND WEST OF  
**IMBERHORNE LANE**  
COMMUNITY · SUSTAINABILITY · LEGACY





VISION DOCUMENT | SEPTEMBER 2020

LAND WEST OF  
**IMBERHORNE LANE**  
COMMUNITY · SUSTAINABILITY · LEGACY



WELBECK LAND

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This artwork was printed on paper using fibre sourced from sustainable plantation wood from suppliers who practice sustainable management of forests in line with strict international standards. Pulp used in its manufacture is also Elemental Chlorine Free (ECF).

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Our key vision objectives for Land West of Imberhorne Lane are set out below:

1. Provision of land to enable the consolidation and integration of Imberhorne Schools on to a single upgraded and modern campus.
2. Provision of new education facilities, to meet early years, primary and secondary school provision.
3. Opportunity to provide a new GP surgery.
4. Creation of a new neighbourhood, defined by a locally distinctive aesthetic, and providing for the education, health care and recreational needs of new residents.
5. Recognition and promotion of the sustainable location of the site, well placed close to local road, rail and bus links, and within walking and cycling distance of the Town Centre.
6. Promotion of a high quality environment and standard of living, which considers the needs of present and future generations.
7. Delivery of housing to meet local needs, including affordable housing, a mix of housing types and sizes, and housing for older people.
8. Promotion of sustainable modes of transport and enhancing existing foot and cycle routes, such as the Worth Way, promoting healthy living.
9. Provision of safe connections to education facilities, maintaining existing foot and cycle links from the Worth Way and ensuring safe crossing of Imberhorne Lane.
10. Capitalise on the wealth of existing green infrastructure, providing a multi-function green infrastructure that is easily accessible to all and improves ecological habitats where possible.
11. Provide recreation opportunities throughout the site, including the provision of onsite strategic SANGs, to mitigate impacts of the development and wider development and growth, on the nearby Ashdown Forest SPA.
12. Use best practice urban design principles to guide the creation of a safe, legible and vibrant new community.



## 1.1. DELIVERING THE VISION

**Development at Land West of Imberhorne Lane will deliver high-quality new homes and provide housing choice for East Grinstead. The unique opportunity to provide key facilities and infrastructure alongside residential development will help to provide certainty for future generations, assist in the building and maintaining of a sense of community, and facilitate the care and independence of older people, benefitting both existing and new residents of Imberhorne.**

### CERTAINTY FOR FUTURE GENERATIONS

Like many parts of the UK, Mid Sussex is facing the challenge of providing sufficient levels of housing, especially from a short-term perspective. A diverse range of homes are required that can meet the wishes of various demographic groups within the population.

Alongside the delivery of new homes it is vital that there is essential infrastructure that improves quality of life – for example school places, traffic mitigation and publicly accessible green space.

With this in mind, Land West of Imberhorne Lane has been designed to harness the long-term interests of the local community. The proposals will ensure certainty for future generations as it will comprise places to live, education opportunities and infrastructure provision.

We aim to provide around 550 homes which represents a major opportunity for local residents looking to relocate. The proposals will be shaped to meet the requirements of the community and we will therefore be providing much-needed housing, and an integrated care facility for older people. We will also be delivering an element of affordable housing, which will be a vital opening for those struggling to get a foot on the housing ladder.

We are committed to developing a sustainable community in East Grinstead and this is why we intend to provide approximately 3.86 Ha of additional land for Imberhorne School. This would serve as space for new playing fields and additional school buildings, and will enable children to learn and teachers to work at new facilities on one convenient site.

Imberhorne School and West Sussex County Council have been proponents of the school consolidating onto one single site. The East Grinstead Neighbourhood Plan references the importance of combining both of the sites, and has identified the land at Imberhorne Lower School for housing development.

The local demand for the school to fuse onto one site is something we want to deliver, as it will create a practical facility which will benefit the community. We are exploring with West Sussex County Council (WSCC) the potential for land to be made available for a new two-form entry primary school to accommodate the needs of new and existing residents.

We have conducted a thorough assessment of transport issues in the area and are working with West Sussex County Council to ensure there are appropriate highways improvements.

The potential enhancements to the local education facilities and transport network have the capability of forming a long-lasting legacy for all East Grinstead residents.





## BUILDING AND MAINTAINING A SENSE OF COMMUNITY

The concept of developing a sense of community is at the forefront of the plans for Land West of Imberhorne Lane and we will be providing Sustainable Alternative Natural Greenspace (SANG) and a Neighbourhood Centre which will become focal points in the local community, and would be available to all East Grinstead residents.

The SANG provision would encourage residents to partake in a healthy and active lifestyle due to its assortment of walking and cycling routes. Those walking through the park would have easy access to the wider countryside through conveniently located public access points, further promoting a healthy lifestyle. This will form the basis for the integration of the development into the surrounding areas and support community cohesion.

The existing Public Rights of Way (PRoW) and safe routes to Imberhorne School crossing the site will be maintained and integrated into the proposals, and enhanced connectivity to the Worth Way and Sussex Border Path to the south of the site will be provided, encouraging sustainable travel choices and healthy lifestyle choices.

The SANG takes the land out of private ownership and guarantees that the land stays in the hands of the community, further adding to the character and identity of East Grinstead.

A new neighbourhood centre is proposed at the heart of the development, close to the proposed school. Comprising a convenience store and community facility, the neighbourhood centre will be used by local groups to host events and activities, forming a crucial aspect of building and maintaining the sense of community. Its location at the heart of the development will keep unnecessary additional car journeys to a minimum and further endorse healthy transport options such as walking and cycling.

The new development will build and maintain a sense of community for both new and existing residents, providing genuinely beneficial facilities that help nurture a true sense of community.

## CARE AND INDEPENDENCE FOR OLDER PEOPLE

We take pride in offering a development which fully takes into account the needs and requirements of older people. We are committed to providing care and independence for older people as part of our proposals and we will be providing a care community which will smoothly integrate into the overall development.

Mid Sussex District Council has identified that the District has an ageing population, and there is a real need to provide housing that can meet the requirements of the older demographic. The demand for specialist accommodation is something that needs to be delivered swiftly and we have resolved to meet these needs.

The care community we are proposing will be positioned at the heart of the proposals to ensure the best possible connection to the wider development. The care community will be situated next to a green corridor to allow for a peaceful and calm environment for the care community residents to take full advantage of.

There is a clear importance in providing high-quality specialist care and we are currently at a time when there is a need to address the national and local shortfall in specialist housing for older people. The care home provided within our proposals will offer the opportunity for vulnerable people to downsize into a property that is dedicated to prioritising their well-being.









## 2. SUMMARY OF THE PROPOSALS



## 2.1. SUMMARY OF PROPOSALS

**The concept proposals for Land West of Imberhorne Lane show how development has been informed by the vision and site analysis undertaken to date.**

Overall, development at Land West of Imberhorne Lane will provide the following key benefits:

- » Provision of additional land for the consolidation of Imberhorne Schools, helping to create an integrated single modern secondary school campus.
- » The proposals will also deliver land for a 2FE primary school and early years provision, in an accessible and sustainable location.
- » Provision of key facilities that will aid a high quality of life and minimise trips made by car.
- » Development located in a deliverable and sustainable location, close to existing local facilities, employment and transport links.
- » The delivery of housing that is set against an identified local and national need, including affordable housing and housing for older people.
- » Provision of new Local Centre within an accessible and sustainable location.
- » Potential for a new GP surgery.
- » Further strengthening of existing foot and cycle links that further promote sustainable transport choice.
- » Consideration of flexibility within the masterplan to cater for future requirements of the community.
- » The aspiration to provide a connected network of open space that is accessible and caters to a range of uses and ages.
- » Provision of strategic SANG, which will form an important asset for the community and a land-mark space for the development.
- » Retention and enhancement of existing green capital within the site that will provide visual amenity, ecological enhancement and community benefits in addition to creating a unique, site specific character.



1. Pedestrian link to SANG
2. Footpath (3km)
3. Wildlife pond
4. Native tree planting
5. Scrub planting
6. Wildflower meadow
7. Timber benches
8. Potential lookout tower
9. Post and rail fence to SANG boundary
10. Potential location for SANG car park  
(1 location to be selected)



Concept Master Plan

Draft Allocation Site Boundary 45.85 Ha	Land Proposed for Imberhorne School Expansion	Residential development	Care community	Areas for attenuation	Street Tree Planting
Additional Land 71.32 Ha	Vehicular access point	Local Centre	Public open space	Proposed areas for formal play	Informal footpath route
Proposed SANG area (including strategic SANG)	Pedestrian/ cycle link	ZFE primary school and community building	Allotments	Tree and hedgerow planting (existing and proposed)	Retained access to existing farmhouse and bridleway
				PRow: Worth Way	







### 3. INTRODUCTION



### 3.1. SCOPE AND PURPOSE OF THE DOCUMENT

**This Vision Document has been prepared on behalf of Welbeck Strategic Land II LLP and the landowners. It sets out the vision and objectives of the proposals for Land West of Imberhorne Lane, a strategic development proposal to the west of East Grinstead.**

The proposals are informed by a wealth of background site assessment by the consultant team, who include:

- » DMH Stallard – Planning Consultant and Project Lead
- » Barton Willmore – Masterplanning and Landscape
- » Pell Frischmann – Highways
- » Stantec – Flood Risk, Drainage and Infrastructure
- » The Ecology Partnership – Ecology
- » Lizard Landscape Design – Arboriculture
- » Orion Heritage – Heritage and Archaeology

The key aims and objectives of this document are:

- » To present a vision that provides a design framework to guide and shape the proposals;
- » To review the site in the context of current Planning Policy;
- » To set out a summary of the site and local context assessment undertaken to date;
- » To present the emerging concept proposals for the site and explain how they have been guided by the vision and site assessment; and
- » To set out a list of key design principles that have shaped the proposals, along with the key benefits that the site will deliver.



Site Location Plan





FELBRIDGE

BIRCHES WOODLAND

BIRCHES INDUSTRIAL ESTATE

*View towards northern site boundary and  
the Birches Industrial Estate.*





BIRCHES INDUSTRIAL ESTATE

IMBERHORNE SCHOOL

View north east across the site towards the  
Birches Industrial Estate and Imberhorne  
School.





IMBERHORNE LANE

EAST GRINSTEAD

THE OAKS  
DEVELOPMENT

IMBERHORNE  
FARM

ACCESS TO WORTH  
WAY (PROW 44bEG-1)



## 3.2. THE SITE

**The site provides an excellent opportunity for new mixed use development in a sustainable location. Located within easy walking and cycling distance of local facilities, amenities and employment opportunities, development at Land West of Imberhorne Lane will benefit from accessibility to rural and urban lifestyles.**

The site is located less than 2km west of East Grinstead town centre, within the north of the administrative boundary of Mid Sussex. It is well located in terms of local, national and international destinations; Crawley, London and Brighton are readily accessible via the M23 and A23 (approximately 8km away) and Gatwick International Airport is approximately 13km north west of the site, allowing easy access to UK and international destinations.

With a choice of two traffic free pedestrian and cycle routes, from the site west to East Grinstead town centre, the site is ideally located for local journeys to be made by sustainable modes of transport.

Heathcote Drive, opposite the site entrance, provides an alternative route into East Grinstead Town Centre, which is less than 2km from the site. It is approximately 1.5km from East Grinstead Train Station, which provides a rail link to London (and stations in between).

The site is close to bus stops on Imberhorne Lane and London Road (A22) providing frequent services to East Grinstead Town Centre, Tunbridge Wells, Crawley and Gatwick.

The site is approximately 45.85 Ha, with an additional 71.32 Ha of land, 42.55 Ha of which is proposed for use as SANG land. Comprising of a number of agricultural fields and hedgerows, which form part of Imberhorne Farm. There are three listed buildings adjacent to the site: Imberhorne Farm (Grade II) and Imberhorne Farm Cottages (Grade II\*) inset along the southern site boundary, and Gullege Farm (Grade II) to the western boundary.

From a high point of 130m Above Ordnance Datum (AOD) in the southeast corner of the site, the land slopes gradually to a low point, of approximately 90m AOD, along the northern boundary. The site has a gently undulating landform, influenced by a small tributary watercourse which runs from Imberhorne Farm towards the northern boundary of the site.

The boundaries of the site are defined by the Worth Way linear country park to the south, Imberhorne Lane, new development at the Oaks and the playing fields of Imberhorne Upper School to the east, the Birches Woodland to the north and a small hedgerow and farmland to the west.

A bridleway crosses the site east-west, providing access to the Imberhorne Farm House complex, Gullege House and the Worth Way long distance path (PRoW: 44bEG-1). A permissive public footpath follows the eastern boundary of the site, providing a traffic free link between the bridleway and Imberhorne School.





Aerial Site Boundary Plan









#### 4. SITE ANALYSIS



## 4.1. PLANNING CONTEXT

**East Grinstead is the 2nd largest settlement in Mid Sussex and is defined at a Category 1 settlement by the Mid Sussex District Plan 2018. The site, which abuts the western boundary of the Town, is a draft allocation in the emerging Site Allocations DPD and seeks to deliver a sustainable mixed use development to meet the needs of the Town and the wider area.**

The site is one of the only locations around East Grinstead which is not subject to any local or national planning designation, such as AONB and Green Belt, it is the only realistic location for strategic mixed use development. The site has a long history of site allocation, previously being part of a wider strategic allocation of c2,500 dwellings to the west of the Town.

The wider site was originally allocated in the West Sussex Structure Plan 2001 – 2016 and identified as an area of growth in the now revoked South East Plan. It was also identified within the draft East Grinstead Strategic Development Area Action Plan (2005) and draft Core Strategy (2008).

### DRAFT MID SUSSEX SITE ALLOCATIONS DPD

The land west of Imberhorne Lane, East Grinstead is allocated in the emerging Mid Sussex Site Allocations Development Plan Document (SA DPD) for residential led mixed use development (Policy SA 20).

The SA DPD is the 'daughter document' to the Mid Sussex District Plan 2018 (District Plan) and seeks to identify sufficient land to meet the residual housing requirement in accordance with the adopted spatial strategy. The SA DPD identifies a residual housing requirement of 1,507 dwellings (as of April 2019) to be met through the site allocation process, with a focus on the most sustainable settlements.

Policy SA 20 allocates the site for c550 dwellings, a local centre, Care Community (C2), early years and primary school (2FE), public open space, children's equipped playspace, provision of land for Imberhorne School and a strategic SANG.

### THE MID SUSSEX DISTRICT PLAN 2018

The Mid Sussex District Plan 2018 (District Plan) sets out the strategic policies for development, including the amount, location and distribution of housing. Policy DP5 of the MSDP sets a minimum housing requirement of 16,390 dwellings over the Plan period of 2014-2031.

The District Plan makes 4 strategic housing allocations (in Burgess Hill, Pease Pottage and Hassocks) but acknowledges that a further 2,439 dwellings will need to be allocated through future Site Allocations DPDs or Neighbourhood Plans in order to meet the housing requirement and maintain a rolling 5 year supply of housing.

The supporting text to Policy DP6 (Settlement Hierarchy) suggests that 1,145 dwellings (post 2017) must identified within East Grinstead.<sup>1</sup>

<sup>1</sup> Planning permission has recently been secured for up to 200 dwellings on land south-west of East Grinstead, at Hill Place Farm. This should be deducted from the forward housing requirement.

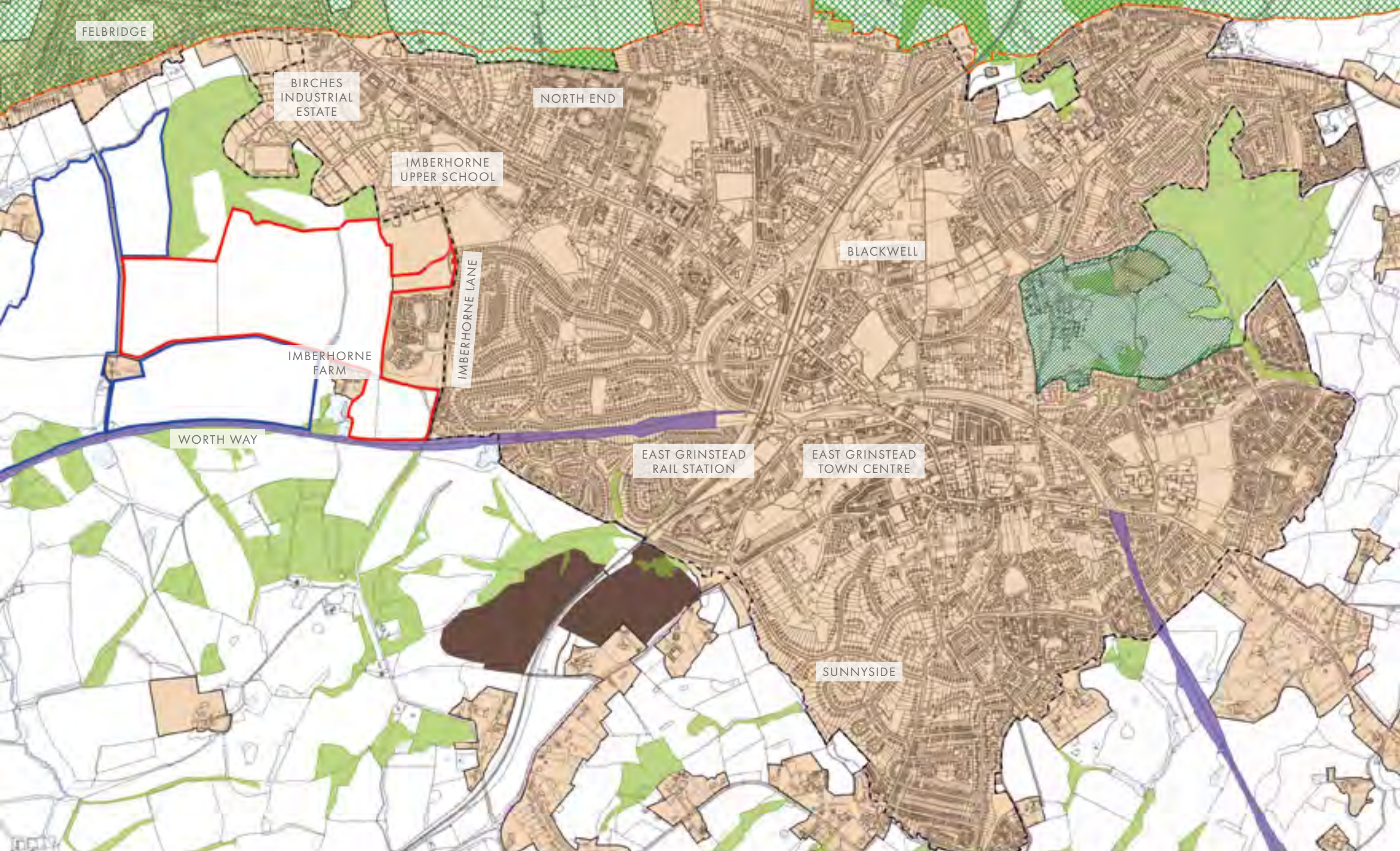
### EAST GRINSTEAD NEIGHBOURHOOD PLAN 2016

The East Grinstead Neighbourhood Plan precedes the adoption of the District Plan and it therefore fails to accommodate the required level of housing, accordingly it is understood that East Grinstead Town Council intends to review the EGNP (in part). However, the general ethos and aspirations of the Neighbourhood Plan should be given attention in the preparation of an emerging site allocation.

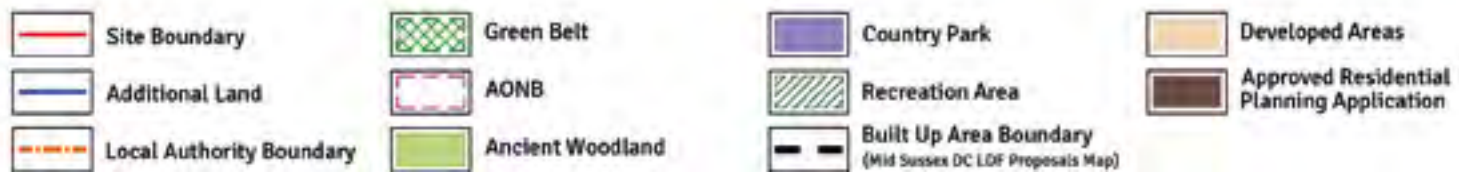
The East Grinstead Neighbourhood Plan allocates land at Imberhorne Lower School for residential development (Policy SS3), Policy EG5 notes that the site is allocated for 200 units. Paragraphs 9.7-9.9 of the Neighbourhood Plan acknowledge that the redevelopment of the Lower School site is only possible with consolidation of the schools on the Land West of Imberhorne Lane site.

Policy SS8 of the Neighbourhood Plan also allocates a broad location south of Birches Industrial Estate and west of Imberhorne Lane for open space and recreation.





East Grinstead Context Plan







## 4.2. ACCESS AND MOVEMENT

**The site is well connected to the surrounding urban area, with easy access to the strategic highway network and sustainable public transport routes. The plan opposite shows the location of the site within the context of the local access and movement network.**

### WALKING & CYCLING

The site is well connected to the existing pedestrian/ cycle network, with footways located to the eastern side of Imberhorne Lane, which provide links to local facilities along Heathcote Drive. There are well established foot and cycle links within the site, that connect in north-south and east-west directions, establishing a permeable and legible network of routes. These routes include a bridleway (PRoW: 44bEG-1) crossing the site east-west along the current access to Imberhorne Farm and Gullege, (providing access to the Worth Way) and a permissive public footpath following the eastern boundary of the site, providing a traffic free link between the bridleway and Imberhorne School.

The Worth Way adjoins the southern boundary of the site and connects Three Bridges and East Grinstead via 11km of traffic free shared use paths, along the route of the former Three Bridges-Tunbridge Wells Railway Line. National Cycle Route 21 (connecting Greenwich to Eastbourne, via Gatwick Airport), the Sussex Border Path (long distance 220km walk from Emsworth to Rye) and Avenue Verte (246km cycle route between London and Paris) all use the Worth Way as part of their routes.

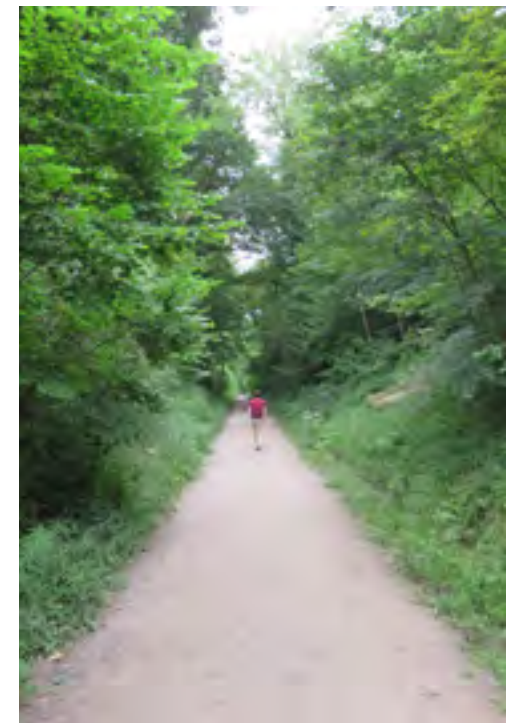
### PUBLIC TRANSPORT

There are a number of bus stops located within a short walking distance of the site, including those located on Imberhorne Lane and Heathcote Drive. In addition to these local services further regional services can be caught from London Road and East Grinstead Railway Station. National Cycle Network (NCN) Route 21 runs in an east-west direction to the south of the site along the Worth Way, and provides a long-distance cycle route, comprising both on and off-road sections, between London and Eastbourne. Locally, it connects East Grinstead with Forest Row, Groombridge and Crawley. There is a dedicated cycleway on London Road and West Sussex CC have recently applied for funding (as part of post covid-19 measures) to extend this cycle way from Englee to the Lingfield roundabout.

East Grinstead Railway Station is located approximately 1.3km east of the site. The station is managed by Southern Rail who operate the majority of services to and from the station routing north via Lingfield, East Croydon and Clapham Junction to London Victoria. In addition to this, Thameslink services also operate from the station north via East Croydon, London Bridge and onto Bedford via St Pancras International and Luton Airport Parkway. Further, key connections can be made at East Croydon for Gatwick Airport and Brighton to the south, at London Bridge for services to Kent and at Clapham Junction for services to the South West of England.

### HIGHWAY NETWORK

Imberhorne Lane forms part of the eastern boundary of the site and offers connections to the local highway network. Approximately 1100m north of the site, the A22 links north to Purley and Godstone, south to Uckfield and Eastbourne and provides direct access to East Grinstead town centre. Junction 10 of the M23 is approximately 9.6km west of the site, providing access to Gatwick, London and Brighton and the wider strategic highway network. From Junction 10 the A2011 provides links west to Crawley and Three Bridges.



*The Worth Way shared use path adjacent to the southern boundary of the site.*

 Site	 Imberhome Upper School	 Heritage Railway Line	 Route 291	 PROW: Footpath	 Woodland
 Developed Areas	 A Road	 Bus Stops	 Route 400	 PROW: Bridleway	 Green Space
 Employment/ Industrial Areas	 B/ Minor Road	 Route 84	 Route 480	 PROW: Worth Way	 Allotments
 Town Centre	 Railway Line + Station	 Route 281	 National Cycle Route 21	 Permissive Foot + Cycle Route	 Watercourse





## 4.3. LOCAL FACILITIES

**The Site is well located to take advantage of a number of local services on foot including schools, retail, employment and health services in the immediate vicinity of the site and is a less than 1.5km from East Grinstead town centre where further retail, leisure and employment facilities are available.**

Local facilities are located along Heathcote Drive approximately 500m walking distance (13 minute walk) comprising a post office, local shop, café and hairdressers. A pharmacy, local shop, takeaway, taxi service and petrol station with food retail are located along London Road, a 950m walk north of the site (12 minute walk). East Grinstead town centre is less than 1.5km east of the site, offering a wider range of retail, leisure, employment transport and community facilities.

### EDUCATION

- » St Peter's Catholic Primary School is 800m east of the site, approximately an 10 minute walk.
- » Halsford Park Primary School is located on Manor Road 850m from the site, approximately a 11 minute walk.
- » Secondary education is provided at Imberhorne Lower and Upper Schools. Imberhorne Lower School is 1.4km from the site. Imberhorne Upper School is located directly north-east of the site; the main access is approximately a 200m walk from the site along Imberhorne Lane.
- » Fledglings Day Nursery and Pre-School is 750m north of the site along London Road, approximately a 9 minute walk.

### HEALTH

- » St Faith Dental Clinic Dentist located on Halsford Park Road, approximately 800m from the site.
- » Moatfield Surgery is 1.8km east of the site.

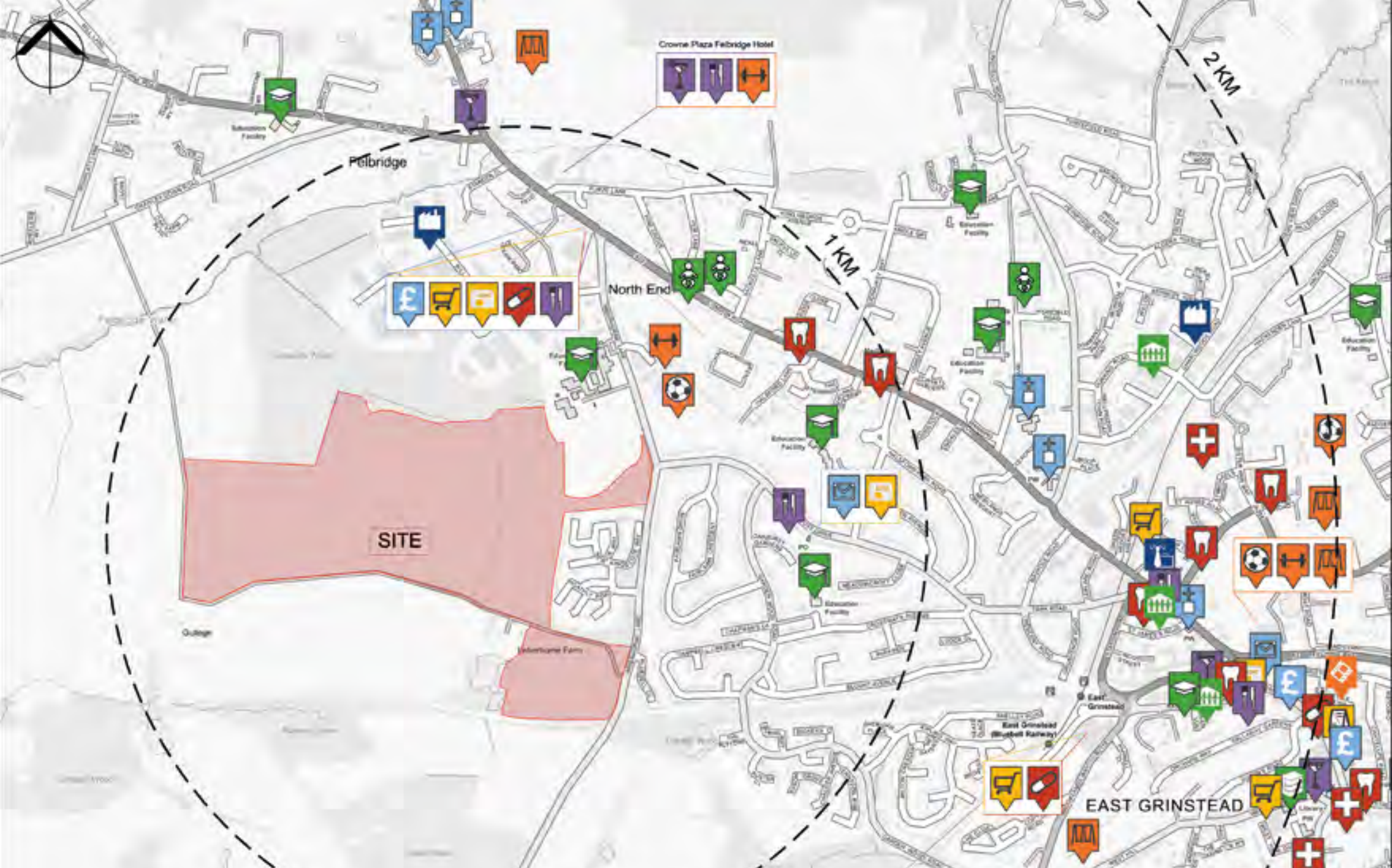
### RECREATION

- » Imberhorne Lane Recreation Ground (park with sports pitches and equipped play area) and Imberhorne Lane Allotments are found north-east of the site with access from Imberhorne Lane.
- » Mount Noddy Park and the Kings Leisure Centre are 1.8km east of the site, offering further recreation facilities.
- » The Worth Way linear Country Park is directly south of the site and offers recreational walking and cycling opportunities.



Top: Imberhorne Lane Recreation Ground  
Middle: Imberhorne Upper School,  
Imberhorne Lane.  
Bottom: Local shops along London Road.





Local Facilities Plan

	Pharmacy		Supermarket		Recreational Area		Bank / ATM		Library		Industrial Estate
	Doctors/Hospital		Newsagents		Leisure Centre		Post Office		Community Centre		
	Dentist		Restaurant/Cafe/Take		Park		Place of Worship		Nursery		
	Shopping Area		Pub/Bar		Cinema		Education		Employment		



## 4.4. LANDSCAPE BASELINE OF THE SITE

The site is located on the western edge of East Grinstead, in the district of Mid Sussex (Fig. 4). In general terms the edge of East Grinstead is characterised by modern, late 20th century housing and large scale industrial buildings (Photos: 2, 4, 11 + Aerial photo).

The landscape is crossed by rivers, streams and numerous watercourse which have influenced its landform, resulting in a series of ridges and valleys. The land to the south of the site gently rises to form a ridge, the landform to the north of the site slopes gently to form a wide river valley. Further to the north beyond the valley, the landform rises, and a ridge runs in a broadly east west orientation (Figs. 11, 12). The settlements of Reigate, Redhill, Godstone, Oxted and Limpsfield are located along this ridge line.

It is a well wooded landscape, with multiple blocks and belts of mature woodland scattered across the landscape. There is a substantial amount of woodland located around the settlement of Crawley to the west of the site. Ashdown Forest, an area of Ancient woodland which occupies a ridge top within the High Weald Area of Outstanding Natural Beauty (AONB), is located approximately 6km to the south east of the site.

The settlements of East Grinstead and Crawley are connected by the A264 which runs to the north of the site (Fig. 1). In the wider setting, a network of roads cut across the area. The M23 motorway runs in a broadly north south orientation around the outskirts of Crawley, and it conflues with the M25 motorway at Junction 8 just north of Redhill.

Around the site there is a network of Public Rights of Way (PRoW), the bridleway (44bEG) which crosses the site emerges from the centre of East Grinstead through the site and on towards Gullege Farm. At this location it splits, a spur travels west towards the settlement of Crawley Down, another travels north towards Felbridge and the final spur travels south where it joins the Worth Way Long Distance Route (Fig 4).

The site is comprised of a series of large scale geometric fields divided by hedgerows, many of which contain hedgerow trees. Imberhorne Farm is located in the southern portion of the site, but is not within the site. The site boundary runs round the farm complex, its associated outbuildings and private grounds, to exclude it from the site.

Within the site the landform falls from a high point in the southeast corner of the site at 130m Above Ordnance Datum (AOD), to a low point of approximately 90m AOD along the northern boundary of the site. Across the length of the site the land undulates gently influenced by a small tributary watercourse which runs from Imberhorne Farm towards the northern boundary of the site.

The Birches Ancient Woodland lines the northern boundary of the site. The eastern boundary of the site is lined by dense hedgerow vegetation, a permissive path runs alongside a portion of this boundary of the site. The southern end of the eastern boundary is adjacent to Imberhorne Lane. The southern boundary runs along the route of a Public Bridgeway (44bEG) which is lined on both sides, in part, by hedgerow vegetation. A large open elevated field is located to the immediate south, with the Worth Way/Sussex Border Long Distance Route running east-west to the south of the field, set within well-established vegetation. The western boundary of the site extends to the bridleway that runs north from the Worth Way/Sussex Border Long Distance Route.




A Public Right of Way bridleway (44bEG) crosses through the central portion of the site. It is occasionally very open but also has places where it is lined on both sides by vegetation, which includes hedgerow trees. The path also serves as the drive to Gullege and as a farm access as well as a PRoW; and runs in a broadly east west orientation.





Landscape Baseline


#### Boundaries and Rights of Way

-  Site boundary
-  Land under control
-  PrioW

#### Landscape Components

-  Housing
-  Woodland/Copse
-  Waterbody/Watercourse
-  Fields

#### Landform

-  Contours 5m intervals





## 4.5. LANDSCAPE AND VISUAL BASELINE OF THE SITE

### LVA BASELINE SUMMARY: LANDSCAPE RECEPTORS

The site's key landscape resources and attributes have include the following assets. They are also the Setting and Site Landscape Receptors that have been identified at this updated stage of LVA work:

#### Landscape Attributes: Setting Landscape Receptors:

- » The rolling and wooded countryside at the northern edge of the High Weald National Character Area;
- » The wooded and secluded valley along Felbridge Water;
- » The rolling and wooded countryside at the northern edge of the High Weald National Character Area;
- » The extensive tree cover within 2km of the site;
- » The tree lined Worth Way;
- » The tree lined PRoW that link the site to the immediate setting;
- » The settlement edge location; and the
- » The heritage assets at Imberhorne Farm and Gullege.

### Landscape Site: Site Landscape Receptors:

- » The landform of the site land;
- » The plants and animals and their habitats that the site land supports;
- » The site boundary elements: the extensive tree cover and hedgerows;
- » The tree lined PRoW's that cross the site;
- » The tree lined drive to Imberhorne Farm; and
- » The historic and cultural actions, marks and memories associated with the human activates on the site.

### LVA BASELINE SUMMARY: VISUAL RECEPTORS

The site's principle visual resources and attributes have been identified and described within this updated LVA. At this stage in the promotion of the site and the development proposal the visual baseline has been defined to include the following assets and also the Visual Receptors Groups that may experience views to the site at specific viewpoints:

### Visual Receptors in the public domain will include:

- » Visual Receptor Group: Walkers and riders on the PRoW across the site:
  - » Activity: leisure based
  - » Likely visual expectations: general countryside components
- » Visual Receptor Group: Walkers and riders on the Worth Way, Sussex Border Path cycleway near the site:
  - » Activity: leisure and possibly commuter based
  - » Likely visual expectations: occasionally open, generally filtered or obscured views from cuttings of general countryside components and Gullege house;
- » Visual Receptor Group: Walkers, riders and motorists and users of public transport along Imberhorne Lane near the site:
  - » Activity: journey based
  - » Likely visual expectations: passing open views of general countryside components

- » Visual Receptor Group: Walkers, riders and motorists and users of public transport along Crawley Down Road near the site:

- » Activity: journey based
- » Likely visual expectations: glimpsed and filtered passing views of general countryside components

### Visual Receptors in the private domain will include:

- » Visual Receptor Group: Walkers, Pupils, staff and visitors to Imberhorne School near the site:
  - » Activity: in-door and outdoor school based activities
  - » Likely visual expectations: a range of open, glimpsed and filtered views of general countryside components
- » Visual Receptor Group: residents in private properties along Imberhorne Lane near the site:
  - » Activity: in-door and garden-based viewpoints



- » Likely visual expectations:  
a range of open, glimpsed  
and filtered views of  
general countryside  
components
- » Visual Receptor Group: residents in  
private properties at the western end  
of Heathcote Drive near the site:
  - » Activity: in-door and  
garden-based viewpoints
  - » Likely visual expectations:  
a range of open, glimpsed  
and filtered views of  
general countryside  
components
- » Visual Receptor Group: residents  
in private properties within the  
Kingscote Way development near  
the site:
  - » Activity: in-door and  
garden-based viewpoints
  - » Likely visual expectations:  
a range of glimpsed and  
filtered views of general  
countryside components.



Worth Way/Sussex Border Path - Under Imberhorne Lane Road Bridge



Approximate extent of site

NORTH DOWNS  
(SURREY HILLS AONB)

HOUSING ON FELBRIDGE ROAD/  
CRAWLEY DOWN ROAD

View A - On site looking north-east towards  
Felbridge and The Birches woodland (from  
PRoW 44bEG-1/drive to Gullege).



Approximate extent of site

THE BIRCHES WOODLAND





Approximate extent of site

THE OAKS  
DEVELOPMENT

ACCESS TO WORTH  
WAY (PROW 44bEG-1)

View B - On site looking east towards  
Imberhorne Farm (from PROW 44bEG-1/  
drive to Gullege).



Approximate extent of site

IMBERHORNE FARM

IMBERHORNE  
COTTAGES







Site not in view

ACCESS TO WORTH WAY  
(PROW 44bEG-1)

View C - At Imberhorne Farm, looking east  
along the drive to Imberhorne Lane (PROW  
44bEG-1).



Site not in view

IMBERHORNE FARM







## 4.6. LOCAL CHARACTER

**The character and form of the proposed development should be responsive to its surroundings. An analysis of existing local development and its form will generate key character drivers, providing references to inform the development proposals.**

East Grinstead comprises a varied character. This ranges from the more formal and urban character of historic ribbon development in the core of the town, to the more suburban and semi-formal character of large scale post-war housing estates. Recent residential development along Imberhorne Lane comprises a more informal and green character.

### URBAN FORM

- » General use of larger development blocks that are organic in shape.
- » Predominantly low to medium density perimeter block development.
- » Use of long, wide and gently curving streets with generous verges and occasional tree planting emphasises a suburban character.
- » Residential development in central East Grinstead tends to comprise higher density development blocks with narrower streets and short terraces commonplace.
- » Development fronts on to primary movement routes.
- » The frequent use of long cul-de-sacs with a lack of pedestrian and cycle links impedes connections through much of the early 20th century development of the town.
- » New development adjacent to the site is well connected in terms of internal vehicular movement routes, which aids the creation of a legible and permeable layout.



*East Grinstead Town Centre ribbon development*



*Suburban East Grinstead post war housing*



## BUILT/ PLOT FORM

- » Generally large detached or semi-detached houses, set within generous plots.
- » The repetitive arrangement of plots creates rhythm along the street scene and further emphasises a suburban character.
- » Plots tend to have deep frontages and follow a continuous building line.
- » Dwellings tend to be 2 storey with some use of single storey development. The use of 2.5 storey dwellings is more prevalent in older properties that are located closer to central East Grinstead.
- » Terraced and semi-detached units are common in areas of East Grinstead. They comprise a more formal and urban character, with the use of narrower plot widths and smaller frontages.



*Central East Grinstead features higher density development*



*Terraces and uniform detailing create a more formal character*



*Planted frontages soften the built form*





## CAR PARKING

- » Parking is predominantly provided on plot in private driveways.
- » Visitor parking is not delineated however, the adequate street width allows for informal visitor parking on street. This appears to aid traffic calming, creating elements of deflection and thus, reducing vehicle speeds.
- » Within central East Grinstead parking is accommodated on street in parallel marked bays.

## OPEN SPACE

- » Formal open space provision is largely located within central East Grinstead.
- » Imberhorne Lane Recreation Ground, the Worth Way linear country park and pockets of informal open space are located within closer proximity to the site.
- » The use of street tree planting provides focal points for long range views along streets and softens the appearance of the built form.
- » Allotments are provided at Imberhorne Lane and Mount Noddy Park, promoting healthy living and community cohesion.

## DETAILS & MATERIALS

- » Private frontages generally accommodate mature planting, larger verges and mature tree planting, aiding the creation of a suburban character.
- » The consistent use of materials and style of dwelling, with variation in the architectural detailing creates a more informal character in suburban areas.
- » Regular plot width, bay windows and evenly spaced openings to boundary treatments enhance the character of the streets, and help create a distinctive identity.



*The use of private driveways aids the suburban character.*



*Brick detailing and bay windows are predominant in the area.*



*The Oaks development (adjacent to the site) successfully integrates development with open space.*





## 4.7. SITE ASSESSMENT: CONSTRAINTS AND OPPORTUNITIES

**The findings of site and context analysis have been evaluated to identify the key constraints and opportunities relevant to the development of the site.**

This will ensure that the proposals are responsive to existing site features and provide mitigation as appropriate. The following points provide a summary of the site assessment undertaken to date, for the following disciplines:

### LAND USE

- » Opportunity to facilitate the consolidation of Imberhorne lower and upper schools into a single modern campus.
- » The proposals will consider the relationship between the existing properties and new development with regards to privacy, amenity and scale.
- » Development will be inspired by the positive elements of the existing built form of East Grinstead.
- » There is the potential for Sustainable Accessible Natural Green Space (SANGs) to be located immediately west of the proposed residential development, north of Worth Way and west of Gullege.
- » Opportunity to provide new GP surgery, local centre and care community close to new residential development.

### ACCESS AND MOVEMENT

- » Primary vehicular access to the development will be provided from Imberhorne Lane, via a new junction opposite Heathcote Drive.
- » A secondary vehicular access point will be located at the existing access to Imberhorne Farm.
- » The existing Public Rights of Way through the site will be retained and integrated with the new network of pedestrian and cycle routes.
- » Opportunity to provide new recreational pedestrian routes through the SANG area.

### DRAINAGE AND FLOODING

- » Development will not be located within land that is at risk of flooding.
- » An open ditch originates just north of Imberhorne Farm and flows north through the site, towards the Birches Woodland, where it exits the site and eventually discharges into Felbridge Water.
- » The proposals will consider the use of Sustainable Drainage Systems (SuDS) to manage surface water runoff rates and benefit landscape amenity and biodiversity.





## Constraints and Opportunities Plan







## LANDSCAPE AND LANDFORM

- » Potential to create a strong network of connected green corridors;
- » Opportunity to restore and enhance tree and hedgerow planting at the western edge
- » Opportunity to give greater public access to the green spaces at the edge East Grinstead
- » Consideration of response to distinct landform
- » Realisation of far reaching off-site views
- » Respect for the heritage assets at Imberhorne Farm and Gullege Farmhouse

## ECOLOGY

- » The development will seek to maximise opportunities to enhance biodiversity and ecology wherever possible, aided by the creation of green corridors that link potential habitats and existing trees and hedgerows.

- » A Preliminary Ecology Assessment and the necessary Phase 2 surveys have been undertaken, identifying the potential for reptiles, bats and birds, there are dormice and the potential for great crested newts in the wider area. Since the initial assessment, a range of species specific works and updated PEAs have been conducted in 2016, 2017, 2018 and 2019. A mitigation strategy will be delivered within open spaces to ensure the ongoing protection of these species.

## HERITAGE AND ARCHAEOLOGY

- » There are no designated heritage assets within the redline of the site. There are a number of listed buildings located in the vicinity of the site. Those in closest proximity, which have the potential to be impacted by the proposals, are Imberhorne Farmhouse (grade II), 1 - 3 Imberhorne Farm Cottages (grade II\*) and Gullege Farmhouse (grade II\*). This is as a result of the buildings being good examples of their type and of the connections with the Manor of Imberhorne. In particular, remnants of the Medieval building are set within the fabric of 1 - 3 Imberhorne Farm Cottages.

- » The significance of all heritage assets was assessed by considering the archaeological, artistic, architectural and historic values. It was found that these values were not harmed by the proposals. The setting of each building was then considered, to determine if the significance of the heritage assets was impacted by development within their setting. It was found that there was no impact due to co-visibility as a result of distance and screening. It was, however, considered that the non-visual attributes of purpose, economy and function were impacted by the loss of the agricultural fields which were once associated with the heritage assets. However, as this was only part of their significance, it was assessed to cause a low level of less than substantial harm to the heritage assets. It was therefore concluded that the proposals comply with the relevant heritage paragraphs contained in Section 16 of the NPPF 2018 and relevant local heritage policy.



DEFRA Conservation Walk  
Bridleway - a circular walking  
route across the farmland of  
Imberhorne Farm











## 5. OUR PROPOSALS



## 5.1. DESIGN PRINCIPLES & CONCEPT

**The proposed concept plan for Land West of Imberhorne Lane is presented opposite. The concept has been informed by the vision and site analysis presented earlier in this document, and shows how the proposals can form an exciting and vibrant development that retains important site features.**

In summary, the proposals for the site could provide:

- » Land for the consolidation of Imberhorne Schools onto a single campus.
- » Primary school and early years provision.
- » A care community delivering housing for older people
- » Provision of affordable housing to meet the needs of local people.
- » Potential new GP surgery.
- » New local centre close to proposed new homes.
- » Significant and high quality areas of public open space, including: strategic Suitable Alternative Natural Greenspace (SANG), existing tree and hedgerow planting, ecological mitigation measures and sustainable drainage systems.
- » Primary point of access via a new signalised junction with Imberhorne Lane and Heathcote Drive, as well as a secondary point of access.

A number of design principles have informed the concept proposals. They are set out on the following pages.

### A HEALTHY AND COHESIVE COMMUNITY

- » The proposed development will provide key facilities to aid a high standard of living and the creation of a cohesive community. These facilities will include a new primary school, care community site and retail and community services contained within a local centre.
- » These facilities are centrally located within the masterplan and are within a 5 minute walk of the majority of dwellings. They will be co-located together, benefiting from a significant amount of activity and forming an attractive landmark space for the development where people will want to congregate.
- » The arrangement of development blocks aim to promote best practice urban design principles; they will overlook streets and spaces wherever possible to encourage safety and natural surveillance.
- » The appearance, scale and density of development will be considered to ensure the creation of an attractive and distinctive character that is responsive to existing built form within the locality of the site.

### PLENTIFUL SUSTAINABLE CONNECTIONS

- » The development proposals offer the opportunity for education facilities (including a 2FE primary school and early years provision) to be delivered within the site, offering significant benefits in terms of easy walking distances to school and sustainability.
- » The proposals offer the opportunity for Imberhorne School to be integrated into a single secondary school campus, with additional land for playing fields and pitches located to the north-west of the development.
- » Two points of vehicular access to the development will be taken from Imberhorne Lane.
- » The strategy for sustainable transport aims to promote attractive and safe links to key destinations wherever possible. Existing public footpaths and bridleways that cross the site will be retained and connected to a new network of pedestrian and cycle routes, desire lines within the site and to the surrounding area.

### MULTI-FUNCTIONAL GREEN INFRASTRUCTURE

- » A new area of strategic Suitable Alternative Natural Greenspace (SANG) will form a significant new asset for the proposals and a destination for the new and existing community.

- » The new Green Infrastructure Strategy will enhance and maintain existing hedgerows and trees, and incorporate them in a new, more cohesive landscape framework.
- » Open space will retain existing ecological habitats and seek to enhance them wherever possible through the provision of large scale open spaces and attenuation areas that will contain a considered mix of planting and public access management.
- » The aspiration to provide a high quality and multi-functional green infrastructure is embedded within the heart of the concept proposals. A variety of spaces and places will form distinctive elements of the development and facilitate recreation, relaxation and play, promoting happy and healthy lifestyles.
- » The development will have a strong framework of formal and informal public open space, creating the setting for the retained and enhanced landscape features.
- » Areas of public open space around Imberhorne Farm, Imberhorne Cottages and Gullege will respect the setting of the Listed Buildings by pulling back the build line of the development and enabling new areas of planting to soften and screen views of the proposed development.



1. Pedestrian link to SANG
2. Footpath (3km)
3. Wildlife pond
4. Native tree planting
5. Scrub planting
6. Wildflower meadow
7. Timber benches
8. Potential lookout tower
9. Post and rail fence to SANG boundary
10. Potential location for SANG car park  
(1 location to be selected)



Concept Master Plan

Draft Allocation Site Boundary 45.85 Ha	Land Proposed for Imberhorne School Expansion	Residential development	Care community	Areas for attenuation	Street Tree Planting
Additional Land 71.32 Ha	Vehicular access point	Local Centre	Public open space	Proposed areas for formal play	Informal footpath route
Proposed SANG area (including strategic SANG)	Pedestrian/cycle link	2FE primary school and community building	Allotments	Tree and hedgerow planting (existing and proposed)	Retained access to existing farmhouse and bridleway
				PRow: Worth Way	





## 5.2. ACCESS AND MOVEMENT STRATEGY

### PROPOSED ACCESS ARRANGEMENTS

A detailed sustainable transport strategy will form an integral part of the Transport Assessment which will be produced at the planning application stage to support the development. This will include details of improvements and enhancements to sustainable transport infrastructure and how sustainable travel will be promoted from the outset of the scheme through the introduction of a detailed and robust Travel Plan.

It is proposed that the development will be accessed through the provision of two vehicular access points onto Imberhorne Lane.

The primary access will be taken in the north-east corner of the development site, immediately to the south of the existing Imberhorne School playing field, and directly opposite the existing junction with Heathcote Drive.

It is considered that the optimal location for connecting the site to the local highway network is to reconfigure and create a 4th arm from the existing Imberhorne Lane and Heathcote Drive Junction. Two junction types have been designed in this location to ensure that flexibility regarding the access strategy is retained, and that the preferred option can be refined as the development proposal

proceeds towards the planning application stage. The primary option considered is to provide access to the site via a four-arm signal-controlled junction formed between the site access, Imberhorne Lane to the north and south and Heathcote Drive to the east. A second option considered is to provide a four arm, 50m ICD roundabout.

### OFF-SITE WORKS

The proposals will be supported by a range of off-site improvements to the existing highway and transport networks. These will consist of a combination of physical improvements to existing junctions within the local highway network, and improvements to sustainable travel infrastructure.

To determine the nature and design of the proposed highway improvements, a series of junction assessments and network-wide traffic modelling is being undertaken. This is being discussed and undertaken with input from West Sussex County Council (WSCC) as the local highway authority. In particular this will focus on the operation of the A22 corridor, and the potential impacts of the proposed development on this critical part of the existing highway network. The outputs of this traffic modelling will inform the level of improvement measures required to mitigate the proposed development.



Proposed 4-arm signalised junction with Imberhorne Lane.





## 5.3. LANDSCAPE STRATEGY

The Landscape Strategy has a clear objective: to realise to the full all the advantages already present in the landscape of the site, at the edge of the settlement and in the countryside setting. The object is to craft a new landscape that is distinctive in character and that belongs to the place and in so doing forms a strong, local and highly successful response to the place.

This over-arching objective sets out a clear requirement for the proposed landscape strategy that will deliver the opportunity for a memorable and enduring scheme. These strategies will make the most of the latent potential that is present in the landform; the extensive woodland, the Worth way cycle route, the connectivity with the countryside; and the links with the land and the history of the place.

The concept for the Landscape Strategy Plan shows the containment of the development within a profoundly green and planted framework. This protection of the countryside is important to the development. The relationship with the Sussex landscape is one of the strongest assets of the scheme. It is a relationship that will continue to be successful through the sensitive placement of building, the retention of trees and field patterns and through the creation of open spaces that increase GI connectivity and that make a good fit in the landscape.

The objective will be met as the public paths will pass through attractive, safe, locally distinctive public open spaces that present a far greater network of paths and accessibility to open green spaces than currently exists.

The finding of the LVA, in particular the comprehensive exploration and understanding of the existing landscape and visual context have shaped a Landscape Strategy, with the objective of creating a site specific, and appropriate, landscape framework within which to accommodate development, successfully assimilating residential development and the required associated components into both the edge of settlement location and the wider countryside.

### **Planning Policy Guidance (PPG) on the Natural Environment (Updated 21st July 2019), to support the National Planning Policy Framework (NPPF).**

#### **Building a strong, competitive economy**

Green infrastructure can drive economic growth and regeneration, helping to create high quality environments which are attractive to businesses and investors.

#### **Achieving well-designed places**

The built environment can be enhanced by features such as green roofs, street trees, proximity to woodland, public gardens and recreational and open spaces. More broadly, green infrastructure exists within a wider landscape context and can reinforce and enhance local landscape character, contributing to a sense of place and natural beauty.

#### **Promoting healthy and safe communities**

Green infrastructure can improve the wellbeing of a neighbourhood with opportunities for recreation, exercise, social interaction, experiencing and caring for nature, community food-growing and gardening, all of which can bring mental and physical health benefits. Outdoor Recreation Value (ORVal) is a

useful online tool that can be used to quantify the recreational values provided by greenspace. Green infrastructure can help to reduce health inequalities in areas of socio-economic deprivation and meet the needs of families and an ageing population. It can also help to reduce air pollution and noise. Mitigating climate change, flooding and coastal change

Green infrastructure can contribute to carbon storage, cooling and shading, opportunities for species migration to more suitable habitats and the protection of water quality and other natural resources. It can also be an integral part of multifunctional sustainable drainage and natural flood risk management.

#### **Conserving and enhancing the natural environment**

High-quality networks of multifunctional green infrastructure contribute a range of benefits, including ecological connectivity, facilitating biodiversity net gain and nature recovery networks and opportunities for communities to undertake conservation work.





## Landscape Strategy

### Boundaries

- Draft Allocation Site Boundary
- Additional Land
- Proposed SANG Area

### Open Space Elements

- Formal Open Space / Playing Fields
- Informal Open Space
- Existing Green Corridors retained and Enhanced
- Northern Buffer Accommodating SuDS Attenuation in Valley Setting



Southern Buffer / Transition to Development



Western Buffer / Transition to Development



Landscape Infrastructure within Development Plots

### Landscape Infrastructure

- Key Landscape Infrastructure
- Landscape Infrastructure within Development Plots

### Routes

- Existing PROWs and Bridleways
- Proposed Key Pedestrian / Cycle Routes

### Masterplan Elements

- Residential Parcels
- Local Centre
- Care Village



## GREEN INFRASTRUCTURE

The Landscape Institute Position Statement: 'Making it home: the power of landscaping to create good housing', (LI. 2010) promotes a philosophy of integration between the technical and creative aspects of new housing provision with a positive response to the landscape of the setting. In the Forward of 'Making it home' the President of the Institute states:

***"Whether the setting is urban or rural, far too many housing developments make little reference to the landscape in which they are set. The pressure in both public and private sectors is to maximise use of available space... many housebuilders are increasingly aware that creating successful developments requires that local context, character and culture are part of the planning, design and management process."***

This exemplar approach lies at the heart of the proposal for the mixed-use development at Imberhorne Farm. Its application is evidenced by the importance given at this early stage in the design of the development, to a successful Green Infrastructure Strategy.

### GI Network links

The linkage between the scheme and the nearby settlements at East Grinstead and Fellbridge, and importantly with the Sussex countryside, will be made through physical connections: the paths and cycle routes, and through the visual lines of sight. The site has established and well-defined boundaries – principally the extensive tree cover around many of its boundaries. Where there are views to the setting, the viewpoints will be created to take advantage of the visual links. This linkage is also made through the culture and history of the place. Our approach as designers of the new landscape is to make a respectful response to these components in the landscape.

The Green Infrastructure (GI) of the new scheme is integral to the nature and quality of the new environment. The public realm will be rich in places for people to enjoy and it will also contain and define the limits of the development. The Landscape Strategy is to craft the green spaces in a manner that achieves a sensitive and successful fit in the Warwickshire landscape whilst also making green spaces people want to have pride in and to call home.

The Green Infrastructure Strategy is an integral part of the Development Proposal and is embedded in the concepts for the Masterplan. A central goal for the GI Strategy will be to strengthen existing links to the wider Green Infrastructure network. Through the creation of new connections, the proposed green spaces will be formed and managed to enrich and diversify habitats of value. The approach will be to balance the pressures and needs of the public for access to green spaces and countryside, with the establishment of durable plant and animal communities. It will address measure to mitigate the impacts of climate change.

This approach has been central to the process that establishes the concept for the masterplan. The key objective for the masterplan has been to set the future development into the host landscape in a manner that achieves a sympathetic and successful assimilation in the countryside at the settlement edge.

### Existing 'Green Capital',

Existing components: Field pattern, hedgerows and trees – the 'Green Capital', in association with new green spaces will give form and structure to the new GI. The existing components in particular the landform and the extensive tree cover around the boundaries will be connected by new green areas to form a network of biodiverse planted linked spaces and habitats. UK BAP habitats in Sussex include a range from lowland farmland, woodland to coastal habitats, those of which are relevant to the site include Hedgerows; Lowland meadows; Traditional orchards and Ponds. These habitats have been incorporated into the development proposals as part of a connected Green Infrastructure providing significant site level enhancements, and also providing increased connectivity for existing and proposed habitats, linking hedgerows, wetland habitats and the provision of a network of niches within the landscape.







### Suitable Alternative Natural Green space: the SANG land

Concept proposals for the 42.07 ha of the strategic SANG land were worked-up in 2019. The principles for the proposals were discussed between the Project Team of Landscape Architects, Engineers and Ecologists, and Officers at MSDC. The proposals for the semi-natural land of the SANG form an important attribute and will be an environmental asset for the development. The SANG sits within well defined and easily recognisable boundaries. It is an attractive open area that is well located to serve the residents of the development as well as the existing communities.

New areas of publicly accessible open green space will be run through the entire development, creating a new connected network of spaces, corridors, and links west, to the semi-natural landscape of the SANG. It will also provide linkage to other GI assets beyond the Site. The existing components will be retained and further enhanced, and the development arranged around it, to provide strategic and meaningful space with a strong sense of place.

A high-level GI and Landscape Strategy proposes the division and softening of the development. On the gently sloping ground this will give the impression of layers of tree canopies between the blocks of development. The SANG will be visible from parts of the development and will provide benefits of greenery beyond its immediate boundaries. The visual GI linkages through the Site are important and will also create a sense of a settlement being set in between trees.

#### Essential Features

The proposal for the SANG land will provide the following essential Landscape features that are required in order for the land to fulfil its purpose as a SANG:

- » Natural greenspace with areas of open (non-wooded) countryside and areas of dense and scattered trees and scrubs. Land should preferably not be entirely flat.
- » A range of habitats should be provided for users to experience if the SANG site is larger than 12Ha.

- » Perceived as semi-natural with few buildings or artificial structures except in the immediate vicinity of car parks.
- » Perceived as safe – no tree or scrub cover along parts of the walking routes.
- » No unpleasant intrusions (e.g. sewage treatment smells etc).

Currently biodiversity on the site is considered to be of limited ecological value, being limited to arable fields with arable field margins consisting of poor semi-improved grassland habitats. Both of these habitats are common and widespread.

The Green and Blue Infrastructure Proposals provide the following enhancements and benefits:

- » The proposed SANGs land, proposed on the western aspect, will provide a greater diversity of habitats present within the current boundaries of the site, including meadow grassland; trees, shrub and woodland planting; a pond and wetland and an orchard.

- » UK BAP habitats in Sussex include a range from lowland farmland, woodland to coastal habitats, those of which are relevant to the site include Hedgerows; Lowland meadows; Traditional orchards and Ponds. These habitats have been incorporated into the development proposals as part of a connected Green Infrastructure providing significant site level enhancements, and also providing increased connectivity for existing and proposed habitats, linking hedgerows, wetland habitats and the provision of a network of niches within the landscape.
- » A mosaic of habitats created within the boundary provides a diverse and rich landscape.
- » Proposed woodland planting, and an increase in diversity of grassland, provides a significant enhancement for foraging and commuting habitats for bats.
- » The creation of a nectar rich, and native landscape, will enhance the opportunities for a number of invertebrates species present.

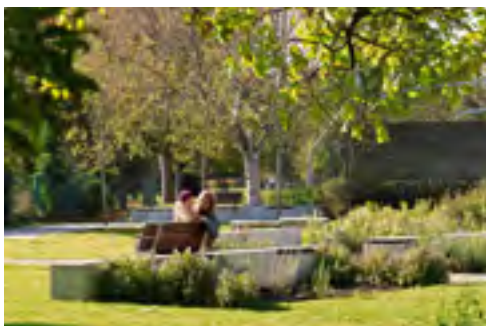








## GREEN INFRASTRUCTURE PRECEDENT IMAGERY







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## BLUE INFRASTRUCTURE

The Green Infrastructure Strategy for the development contains a strategy for Blue Infrastructure – the management and care of the environment associated with water systems. The Blue Infrastructure will comprise the aspirations for a multi-purpose approach to the green spaces in the development. It will comprise and deliver the requirement of Sustainable Urban Drainage (SuDS) and a water treatment train that looks at natural measures to ensure the protection of water quality. Flood prevention measures will be drafted to have an awareness and responsibility to also deliver public amenity and biodiversity gains. The SuDS system will require several basins to be created to attenuate surface water and these have been set within green spaces. The basins, swales, ditches, rills and 'Rain Gardens' will be located to serve drainage operational requirements. The modern, forward looking SuDS regime within the scheme will capture the opportunities for biodiversity enrichment through wetland habitat creation and management.

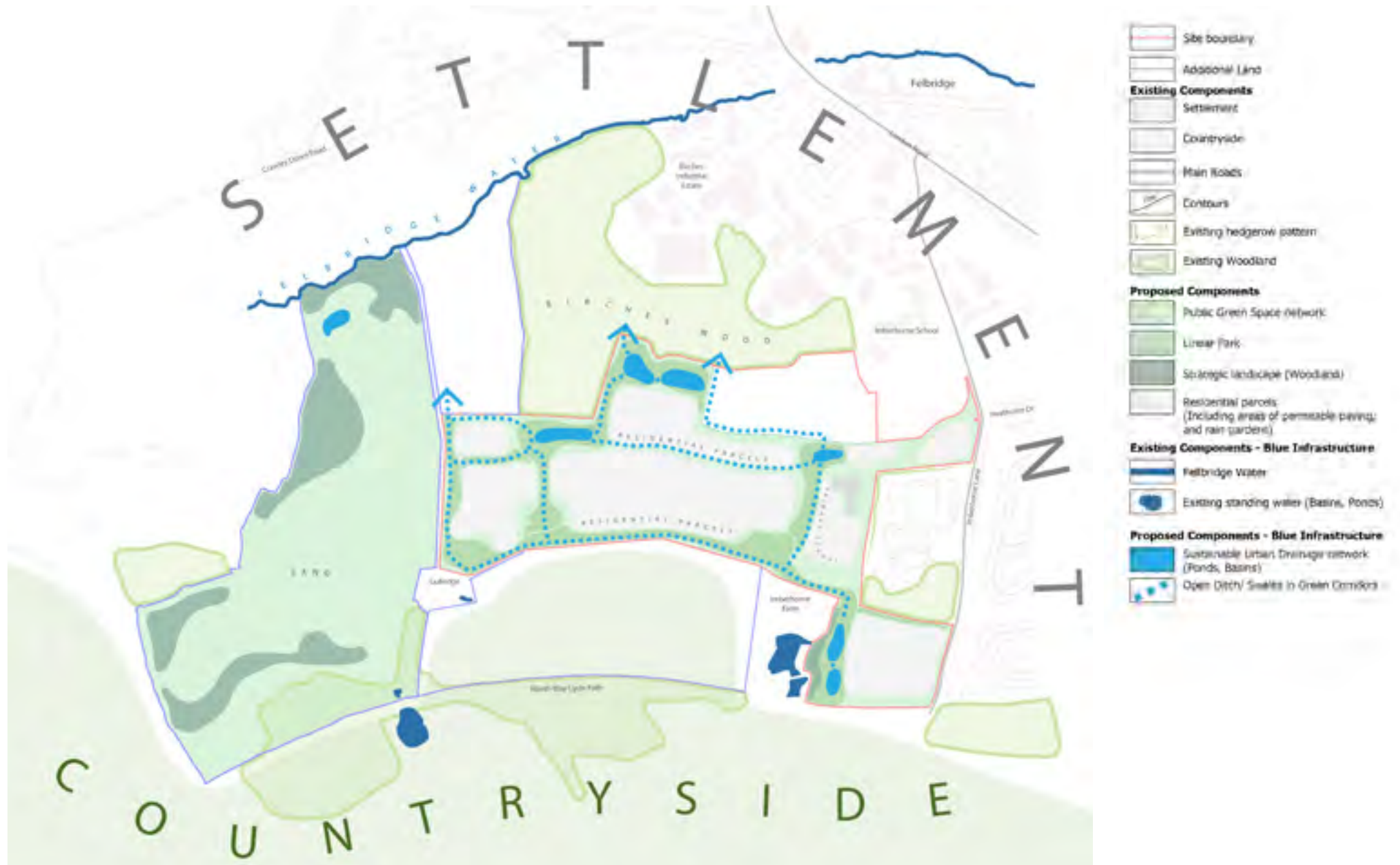
The Drainage Strategy provides a significant enhancement to the Blue Infrastructure on the site.

### The drainage proposals

- » Follow, incorporate and extend the existing network of watercourses and ponds, in line with the West Sussex Policies (SuDS Policy 1 and 3) for the Management of Surface Water
- » Provide management for flood risk, with attractive solutions such as connected swales, ponds and attenuation features, integrated within the layout and design of the proposals, with their management and maintenance considered from the outset, in line with SuDS Policies 2 and 6
- » Include ponds and swales, located with the open space network, have been designed to complement and contribute to the multi-functional amenity of the open space for the development, such as providing a village pond as a focal point for local centre, in line with SuDS Policy 8

- » Provide a network watercourses, swales and ponds that respond to the landform of the site, dropping into the valley formed by Felbridge Water, to the north of the site, connecting into the wider network of blue infrastructure, and reflecting and complementing the wider valley landscape in line with SuDS Policies 3 and 10
- » Include permeable paving in areas such as car parking courts, private driveways and communal areas to contribute to the surface water treatment at source within the development
- » Contribute to increased biodiversity across the site, through the provision of ponds and swales, and the associated diversity of marginal/riparian habitats, in line with SuDS Policy 9









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## BLUE INFRASTRUCTURE PRECEDENT IMAGERY









## 5.4. PUBLIC ENGAGEMENT

### **Consultation with the local community throughout the planning process is a fundamental principle in national legislation, Government guidance and local policy.**

Early and effective communication with the Local Authority and community sets the tone for a constructive engagement process, which allows for any potential issues with the scheme to be overcome, and wider community benefits to be created.

Welbeck Strategic Land believes that engagement with Mid Sussex District Council and the East Grinstead community is a core element of the planning process.

Land West of Imberhorne Lane is a single-ownership site and it is hoped that Welbeck, Mid Sussex District Council and East Grinstead residents will be able to successfully work together as a partnership to deliver an exemplary development.

Mid Sussex District Council's Statement of Community Involvement (2011) states that: "The Council is committed to encouraging new investment of the highest quality that contributes to the well-being of existing and future communities and recognises that it is important to reduce uncertainty for local communities when applicants bring forward proposals for development.

The successful delivery of significant major developments requires commitment to partnership working, sound project management and effective communication with the community, developers, and other agencies".

As Welbeck Strategic Land promotes and develops the proposals for Land West of Imberhorne Lane, it intends to closely reference what has been set out in the Mid Sussex District Council Statement of Community Involvement.

A variety of methods will be used to involve the community throughout the planning process. These are expected to include the following:

- » Regular engagement with Mid Sussex District Council officers
- » A dedicated consultation website
- » Press releases
- » Meetings with stakeholders and representatives (County, District and Parish councillors, including ward members and East Grinstead Town Council)
- » A public exhibition

Welbeck Strategic Land is committed to including as many individuals and groups as possible. This will include groups and organisations that are considered "hard to reach" (including elderly and young people). As with all other aspects of the proposal, Welbeck Strategic Land will follow best practice in its approach to community and stakeholder engagement during the planning process. We will aim to take account of all comments received as we develop the proposals to meet the aspirations and objectives of Mid Sussex District Council and the wider community.









## 6. SUMMARY OF ASPIRATIONS & NEXT STEPS





## 6.1. SUMMARY

**The emerging concept proposals for Land West of Imberhorne Lane show how development has been informed by the vision and site analysis undertaken to date.**

Our key vision objectives for Land West of Imberhorne Lane are set out below:

1. Provision of land to enable the consolidation and integration of Imberhorne Schools on to a single upgraded and modern campus.
2. Provision of new education facilities, to meet early years, primary and secondary school provision.
3. Opportunity to provide a new GP surgery.
4. Creation of a new neighbourhood, defined by a locally distinctive aesthetic, and providing for the education, health care and recreational needs of new residents.
5. Recognition and promotion of the sustainable location of the site, well placed close to local road, rail and bus links, and within walking and cycling distance of the Town Centre.
6. Promotion of a high quality environment and standard of living, which considers the needs of present and future generations.
7. Delivery of housing to meet local needs, including affordable housing, a mix of housing types and sizes, and housing for older people.
8. Promotion of sustainable modes of transport and enhancing existing foot and cycle routes, such as the Worth Way, promoting healthy living.
9. Provision of safe connections to education facilities, maintaining existing foot and cycle links from the Worth Way and ensuring safe crossing of Imberhorne Lane.
10. Capitalise on the wealth of existing green capital, providing a multi-function green infrastructure that is easily accessible to all and improves ecological habitats where possible.
11. Provide recreation opportunities throughout the site, including the provision of onsite SANGs, to mitigate impacts of the development on the nearby Ashdown Forest SPA.
12. Use best practice urban design principles to guide the creation of a safe, legible and vibrant new community.

## 6.2. NEXT STEPS

**The proposals for the land at Imberhorne Farm present a genuine opportunity to deliver a sustainable extension to East Grinstead to meet a range of local needs for now and years to come.**

Welbeck Strategic Land is committed to continued engagement with community stakeholders, including East Grinstead Town Council, Mid Sussex District Council and West Sussex County Council, particularly in relation to the expansion and consolidation of Imberhorne Secondary School.

The Land West of Imberhorne offers a sustainable solution to meeting the housing needs identified within the District Plan and providing enhanced educational facilities, while simultaneously providing a high quality environment with areas of public open space including an allotment, a community orchid and a strategic SANG for the enjoyment of the wider population.

Going forward, Welbeck Strategic Land are committed to supporting the allocation of land within the Mid Sussex SA DPD and will bring forward a planning application for the site at the appropriate stage. In the meantime, we encourage active participation in the project from the local community, and we can be reached on the 'Provide Your Feedback' page of the scheme website.

[www.landwestofimberhorne.co.uk](http://www.landwestofimberhorne.co.uk).





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**BARTON  
WILLMORE**



Planning Policy  
Mid Sussex District Council  
Oaklands House  
Oaklands Road  
Haywards Heath  
RH16 1SS

**Date** 28 September 2020  
**Your ref** SA20  
**Our ref** 0704/296724-8

Dear Sirs

**Mid Sussex Site Allocations DPD Regulation 19 Consultation**  
**Land south and west of Imberhorne Upper School, East Grinstead – Policy SA20**  
**On behalf of Welbeck Strategic Land (II) LLP**

DMH Stallard LLP act on behalf of Welbeck Strategic Land (II) LLP (“Welbeck”) in relation to the promotion of land west of East Grinstead (also known as land at Imberhorne Farm), allocated at policy SA20 of the Regulation 19 Site Allocations DPD (“SA DPD”). Welbeck wholly support the inclusion of the site within the SA DPD; it accords with the strategic policies of the District Plan and is based on robust evidence base. We therefore submit that policy SA20 is sound, in accordance with the tests set out in the NPPF.

Welbeck and DMH Stallard have consulted with Mid Sussex District Council (MSDC), West Sussex County Council (WSCC) and East Grinstead Town Council (EGTC) for some time, to bring forwards an appropriate proposal for the land west of East Grinstead, that delivers against the housing need for East Grinstead, including the need for housing for older people, whilst also providing for wider infrastructure needs such as the provision of secondary, primary and early years education, GP provision and a Strategic SANG (Suitable Alternative Natural Green Space).

It is recognised that there are local concerns that the proposal is, in part, are contrary to the East Grinstead Neighbourhood Plan (EGNP), Welbeck wholly support neighbourhood plans as an important part in shaping communities and delivering against local development needs. However, the EGNP was adopted in 2016, prior to the adoption of the District Plan in 2018, and as such, it does not reflect the latest calculation of housing, or other, needs. The EGNP does however, at policy SS8 promote public open space, including SANGS, playing fields, allotments and cemetery on land west of Imberhorne Farm, the proposal delivers against the majority of these uses. Furthermore, it has the ability to release land at Imberhorne School, Windmill Lane, as allocated at Policy SS3 for housing development. As such, the proposal

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DMH Stallard LLP is a limited liability partnership registered in England (registered number OC338287). Its registered office is Griffin House, 135 High Street, Crawley, West Sussex, RH10 1DQ and it is authorised and regulated by the Solicitors Regulation Authority. The term partner is used to refer to a member of DMH Stallard LLP. A list of members may be inspected at the registered office. The firm is part of Law Europe and is represented around the world through its international network.





seeks to unlock allocations within the EGNP whilst also meeting housing needs as identified in the higher order District Plan.

Policy SA20 - A Sustainable, Healthy Community for East Grinstead

Policy SA20 allocates the land west and south of Imberhorne Upper School (Imberhorne Farm) for a range of uses that will deliver a new sustainable community for East Grinstead, reducing the need to travel through significant on-site opportunities, but also benefiting from connectivity to the existing area through good bus links and footway / cycleways such as the Worth Way. The allocation will deliver against the identified housing need for East Grinstead and Mid Sussex, as adopted in the District Plan, boosting housing in accordance with the NPPF.

Welbeck are committed to the delivery of the proposal as set out in Policy SA20 and wholly support the Council's identification of the site through the Local Plan process, acknowledging the significant evidence base that has been undertaken and shared with the Council. It also reflects significant site assessment which has been undertaken by the Council at site level and strategically, particularly in relation to transport and highway capacity.

In summary and as defined by Policy SA20, Welbeck are committed to delivering:

- Approximately 550 dwellings, including 30% affordable housing;
- A Care Community;
- Land for a 2FE primary school and early years provision;
- 4ha (net) of land for expansion and consolidation of Imberhorne Secondary School;
- Local centre, including GP provision;
- Public open space; and
- 40ha of Strategic Suitable Alternative Natural Greenspace (SANG).

At present, the Concept Masterplan is in draft form, however this is enclosed within these submissions. It is based on the significant evidence base undertaken so far and considerable consultation with the Council to date. As such, it is considered to be a sound approach to masterplanning for all the proposed uses, demonstrating deliverability of the scheme.

The evidence base has been submitted to MSDC throughout the process, from initial site submission through to the Council's Regulation 19 'Site Library'. Welbeck commend the Council for sharing a suite of 'Site Library' documents, to share the evidence base with members of the public in the interests of transparency. The latest documents are submitted alongside these representations and include:

- Concept Masterplan 2020
- Care Community Capacity Sketch Layout 2020

- Vision Document 2020
- Landscape and Visual Impact Appraisal 2020
- Transport Appraisal 2020
- Heritage Statement 2020
- Flood Risk and Drainage Strategy 2020
- Ecological Report 2020
- Care Community Demand Study 2019

These reports, combined with MSDC's own evidence base, demonstrate that the site is suitable for development, and should be read alongside these representations.

The District Plan did not allocate any housing in East Grinstead notwithstanding it being a Category 1 settlement. It is acknowledged that the EGNP allocates some sites for housing (including land at Imberhorne Lower School), but the District Plan followed the EGNP and identifies a minimum residual housing requirement (post 2017) of 1,145 for East Grinstead. The residual housing need has been revised as part of the SA DPD process to account for further commitments and the Sustainability Appraisal supporting the SA DPD (February 2020) states that the revised residual housing figures for East Grinstead is 706 dwellings (paragraph 6.31 – Table 13).

East Grinstead is a Category 1 settlement, as defined by policy DP6 of the District Plan, which recognises it as a *"Settlement with a comprehensive range of employment, retail, health, education, leisure services and facilities. These settlements will also benefit from good public transport provision and will act as a main service centre for the small settlements."* The Sustainability Appraisal (SA) supporting the Regulation 19 document recognises that the SA DPD should plan for at least the residual housing need. Furthermore, that in accordance with Policy DP4, the residual requirement should be spatially distributed in general accordance with the established settlement hierarchy, this approach was found sound through the District Plan process and we support the Council's continued application of the spatial distribution of housing. The allocation of land at Imberhorne Farm (policy SA20) will contribute towards that residual need of the district, and of East Grinstead (c706 dwellings) and in accordance with the settlement hierarchy.

Acknowledging that there is a residual housing need in Category 1 settlements, all of which arises from an unmet need in East Grinstead, the Council have rightly considered all options for development around the town. However, there are few remaining directions in which to expand the town without impinging on nationally protected areas. The land west of East Grinstead is one of the least environmentally constrained areas around the town; land to the north (within Tandridge District) is Green Belt and land to the east and south forms part of the High Weald Area of Outstanding Natural Beauty (AONB). Furthermore, the Council's landscape evidence base comprising the 'Capacity of Mid Sussex District to Accommodate Development 2014' and 'Landscape Capacity Study 2007', identifies land to the west of East Grinstead as one of only 3 locations within the District considered to have Medium /

High capacity for development. As such, there are very few locations to meet the residual housing need, and land at Imberhorne Farm has the capacity to accommodate development without an impact on nationally protected areas, on a site which is relatively unconstrained.

Paragraph 72 of the NPPF acknowledges that the supply of new homes can often be best achieved through planning for larger scale development, such as extensions to towns, providing that they are well located and designed. East Grinstead is a Category 1 Settlement, and the only top tier settlement in the north of the District, it is therefore a highly sustainable settlement. Furthermore, the NPPF acknowledges that this is often a way of meeting needs in a sustainable way, such proposals are able to:

- a) consider the opportunities presented by existing or planned investment in infrastructure, the area's economic potential and the scope for net environmental gains;*
- b) ensure that their size and location will support a sustainable community, with sufficient access to services and employment opportunities within the development itself (without expecting an unrealistic level of self-containment), or in larger towns to which there is good access;*
- c) set clear expectations for the quality of the development and how this can be maintained (such as by following Garden City principles), and ensure that a variety of homes to meet the needs of different groups in the community will be provided;*
- d) make a realistic assessment of likely rates of delivery, given the lead-in times for large scale sites, and identify opportunities for supporting rapid implementation (such as through joint ventures or locally-led development corporations); and*
- e) consider whether it is appropriate to establish Green Belt around or adjoining new developments of significant size.*

In accordance with this criteria, Policy SA 20 will deliver a sustainable community, with sufficient access to services and employment. The proposed development will deliver a range of additional land uses in addition to the 550 dwellings proposed, including; land for a primary school (and early years provision), land for expansion of Imberhorne Secondary School, a Care Community (housing for older people), and significant open space including a Strategic SANG. The development will provide social and economic opportunities within the proposal itself, as well as being well located close to existing employment opportunities (Birches Industrial Estate and the Town Centre).

The development will also promote healthy communities, as required by Section 8 of the NPPF. Paragraph 91 of the NPPF requires that policies should aim to achieve healthy, inclusive and safe places, the development of land west of East Grinstead, will deliver against these objectives as follows:



- It will promote social interaction, including opportunities for meetings between people who might not otherwise come into contact with each other, through the delivery of primary and secondary education, mixed housing tenures and housing for older people (paragraph 91 of the NPPF).
- The scheme will deliver additional early years, primary and secondary education on the site, to meet the needs of the local area as well as the need arising from the proposal itself (paragraph 94 of the NPPF).
- It will reduce the need to travel by car. The site is well linked to existing bus routes and is within walking/cycling distance of a Train Station. It will include significant opportunities for new footways and cycleways, linking the site to the Worth Way and other existing routes and will promote active travel (paragraphs 91 and 98 of the NPPF)
- It also has a range of uses on the site, which will reduce the need to travel, including a local centre, education and employment needs and is close to existing employment opportunities, and a wider range of local shops.
- The significant open space, including strategic SANG, totalling over 50ha will provide opportunities for healthy lifestyles such as walking and cycling, it will also promote social interaction. The additional land for Imberhorne Secondary School will provide superior sports provision for the School, but will also be available for use by the wider community (paragraph 96 of the NPPF).
- The local centre and Care Community provides an opportunity to deliver new health care services to the west of East Grinstead (subject to local need, defined by the CCG) (paragraph 91 of the NPPF).

Importantly, the proposal delivers much more than simply standard housing to meet the residual housing needs of East Grinstead and the wider area, it delivers a suite of additional benefits to deliver a new sustainable community. The details of the proposal are outlined below, and reflect the Council's criteria as set out in Policy SA20.

#### *Access*

The main scheme access will be via Imberhorne Lane, through the creation of a new junction with Heathcote Drive. In addition, there is a secondary point of access for the Care Community and for emergency vehicles only, to the south of the main access point, also onto Imberhorne Lane. This has been subject of assessment by West Sussex Highways Authority, who are in agreement with the design and approach to site access.

#### *Meeting the needs of Imberhorne Secondary School*

The proposal will deliver an additional 4ha (net) of land to Imberhorne Secondary School, enabling the consolidation of Imberhorne School campuses as identified within the EGNP at Policy SS3.

Imberhorne Secondary School is currently split across 2 sites over 1.5km apart. Lower School, which serves School Years 7 – 9, is on Windmill Lane and Upper School is on Imberhorne Lane, and serves School Years 10 – 13. The Lower School site is allocated within the EGNP (Policies EG6 and SS3) for c200 dwellings and is therefore included within the MSDC housing trajectory for the delivery of housing across the plan period.

The Lower School is in need of significant investment, but there are also management and financial issues arising from having split school sites, including onsite administration, commuting of teaching staff between the campuses, but also the availability of facilities to all students. WSCC and Imberhorne School have long been committed to consolidating the school campuses on the Imberhorne (Upper) Lane site, as outlined in the EGNP. Welbeck have worked with WSCC to agree a land swap which would provide a net increase in school land of 4ha, to include enhanced sports facilities and allow for consolidation of the school sites onto the Imberhorne Lane site. The land swap will also provide a second point of access to the wider site, which can also serve the new school facilities which will be made available to the wider community.

Therefore, the delivery of policy SA20, enables the consolidation of Imberhorne School campuses to include significant enhanced, modern facilities as well as the release of land at Imberhorne Lower School for housing, in accordance with the EGNP (policies EG6 and SS3) and the MSDC housing trajectory. As such, the proposal not only delivers enhanced secondary educational facilities, but it provides c550 dwellings towards the residual housing need and unlocks the c200 dwellings already allocated in the EGNP. It also accords with the approach set out in the NPPF (paragraph 94) which highlights the importance of providing a sufficient choice of school places to meet the needs of existing and new communities, taking a collaborative approach to meeting this requirement.

### *2FE Primary School and Early Years Provision*

The proposal will deliver c2.2ha of land for a new two form entry primary school and early years provision. It is acknowledged that due to the expansion in population, local school are nearing capacity, additionally, the development itself will generate a need for more school spaces. As such, to meet these needs, which have been confirmed by West Sussex County Council, and ensure the needs of future generations are met, the proposal will deliver land for a 2FE entry primary school.

The Concept Masterplan seeks to deliver the school in initial phases of the proposal, adjoining the existing built up area boundary (BUAB) and existing residential development. It is also located close to the new playing fields for Imberhorne Secondary School, to enable sharing of the sports facilities if appropriate. Furthermore, the siting of the school also provides an active entrance to the development whilst providing a green buffer between built form and the listed buildings of Imberhorne Farm.

### *Community Hub*

The proposal will deliver a small mixed-use community hub at the entrance to the site. The mixed-use hub can deliver a range of community facilities to meet the needs of the development and the wider area, including a GP surgery, as outlined in Policy SA20. East Grinstead currently benefits from only three GP surgeries, all of which are on the east of the town, the inclusion of a GP surgery within the site will offer health care provision on the west of the town to both existing and future residents. It is intended at this stage, that the mixed-use hub could provide a range of community uses, whilst ensuring that it does not detract from other local shopping parades.

### *Care Community*

A Care Community is proposed in the south east parcel of the site, it will have a direct access onto Imberhorne Lane (although it is proposed that further access into the site will be for emergency vehicles only). The proposals, at this stage, are indicative, but a draft scheme layout is enclosed, this will provide a mix of extra care and independent care dwellings all at a maximum of two storeys.

The indicative proposal will deliver a total of 141 units, of which 109 would be defined as 'extra care' and 32 'independent care', both fall within Use Class C2.

A Demand Study has been produced by Avison Young (enclosed), this identifies that the population of 65 and over, is expected to increase 12.1% between 2017 and 2022, within a 10 mile radius of the site. Additionally, the report identifies a total need for extra care of 1,827 dwellings but a supply of only 165 dwellings in the catchment of the site. As such, there is a significant unmet need for extra care housing within the site area. Additionally, the Council acknowledge within the HEDNA, and through policy DP25 of the District Plan, that there is a need for specialist housing for older people, that would be met through the SA DPD.

Paragraph 61 of the NPPF requires that the housing needs of different groups, including older people, should be assessed and reflected in planning policies. The Planning Policy Guidance has a number of paragraphs on the importance of planning for the needs of older people. It acknowledges that people are living longer and the proportion of older people in the population is therefore increasing. It therefore states that *"Offering older people a better choice of accommodation to suit their changing needs can help them live independently for longer, feel more connected to their communities and help reduce costs to the social care and health systems."*

The Council have undertaken an assessment of housing needs for older people through the HEDNA Addendum 2016 supporting the District Plan. The HEDNA Addendum identifies shortfalls (at 2014) for nearly all types of housing for older people, including Sheltered



Housing (Independent living) (-9%), Enhanced Sheltered Housing (Independent Living) (-61%) and Extra Care provision (-36%). Additionally, the Demand Study undertaken for Welbeck, by Avison Young, and enclosed herewith, expands on that assessment, demonstrating the extent of housing need for older people within the broad locality of the site.

The NPPF and PPG place great weight on ensuring that the housing needs of all groups are met, including housing for older people. The delivery of a care community on the site, through Policy SA20, will deliver towards this current unmet need, particularly in the absence of alternative site provision.

#### *Strategic SANG, Public Open Space and Allotments*

The proposal will deliver a Strategic SANG of c42 hectares to the west, beyond the north/south track between The Gullege and Felbridge (locally known as 'The Gullege'). The Strategic SANG has been designed by specialist consultants (Barton Willmore – Landscape, and Ecology Partnership – Ecology) and in consultation with MSDC to ensure that it provides the appropriate environment in accordance with Natural England's guidance, including a circular walk of 3km. It provides a wildlife pond, additional native tree and scrub planting, a wildflower meadow and points of interest including a possible look out tower and benches. The proposed SANG masterplan is shown on the Concept Masterplan.

The 3km walk will also connect to a wider network of public rights of walk, including 'The Gullege' towards Felbridge, the Imberhorne Farm track, within the green corridors to be provided within the site, and also towards the Worth Way, a linear Country Park. As such, there are myriad of opportunities for walking in addition to onsite provision.

The provision of 42ha is considerably in excess of that required by the development itself. The Strategic SANG will provide mitigation against recreational activity on the Ashdown Forest Special Protection Area (SPA), encouraging existing and future residents to use this area for recreation and dog walking. It provides mitigation for the proposed development, but also for schemes in the north of the District, enabling continued housing growth against the identified housing needs, whilst ensuring the continued protection of the Ashdown Forest SPA. Therefore, complying with national and local planning policy and the relevant environmental legislation.

The scheme has also been designed to provide significant formal and informal open space and green corridors throughout the site, which is identified in the EGTC at policy SS8. Furthermore, the provision of a SANG to the west of the development safeguards against further encroachment of development in this location, protecting from coalescence with Crawley Down beyond. This can be used by existing and future residents. This will include children's play space, an equipped area of play and allotments.

### *Delivery*

Welbeck support the Council's identification of the timescales for development of the proposal. Welbeck have undertaken significant site assessments which could support a planning application at the earliest opportunity, there are no constraints to the delivery of the site in the 1 – 5 year plan period.

Furthermore, there is a pressing need to deliver the site to enable the expansion and consolidation of Imberhorne Secondary Schools onto the Imberhorne Lane site, which can only be realised through the release of the land identified through Policy SA 20. Any delay to the release of the site would result in future deterioration of the facilities and therefore education provision at the Imberhorne Lower School site, as well as a delay to the release of that site for housing, as set out in the EGNP. The early delivery of the school proposals will also unlock the development of land at Imberhorne Lower School, as identified within the EGNP, which is also critical to housing delivery in the plan period.

### *Policy SA20 amendments*

Welbeck acknowledge the considerable work undertaken by MSDC to produce the SA DPD and the detailed policies within it. Welbeck also welcome the amendments to the policy arising from the Regulation 18 consultation. However, we still have concern with the reference to the possible provision of plots for Gypsies, Travellers and Travelling Showpeople.

Policy SA20 will deliver significant local infrastructure over and above that normally required of a site of this size and significantly more than other sites within the District Plan and SA DPD. Whilst this is a reflection of local infrastructure needs, any further district level infrastructure provision puts at risk the viability of the site and would place onerous burden on the proposals.

Furthermore, detailed masterplanning of the site has been undertaken, which shows how the proposed uses can be assimilated onto the site. The masterplanning to date, does not account for land for gypsies, travellers and travelling showpeople and it is questioned how this could be delivered on the site in a satisfactory way without the loss of other land uses proposed through the policy requirements. Welbeck therefore object to the inclusion of this provision through policy SA20.

### MSDC SA DPD Evidence Base

#### *SHELAA Site Assessment (Site Ref. #770)*

Welbeck have undertaken a suite of site assessments which have been shared with the relevant statutory consultees, including the District Council as part of the Call for Sites, the

Regulation 18 Consultation, Site Allocation Library and throughout the process of site promotion. The latest site assessment, submitted to the Council as part of the Site Allocation Library (in addition to the Concept Masterplan and Vision Document), and contained herewith includes:

- Highways Appraisal
- Landscape and Visual Impact Appraisal
- Ecology Report
- Flood Risk and Drainage Strategy
- Heritage Statement

Tree surveys have also been undertaken, but as trees and hedgerows are confined to field boundaries and will be largely untouched by the development, they are not enclosed as they are also large documents. However, they have been made available to the Council at earlier stages of the site promotion process, and can be made available again if necessary, but it is welcomed that the Council acknowledge in the SHELAA that trees are not a constraint to development.

The above site assessment has enabled MSDC, their external consultants and statutory consultees to make an informed assessment of the site through the SHELAA process, which Welbeck largely support as a detailed and sound appraisal of the suitability of the site for development. Welbeck support the robust SHLEAA process, the Council commenced with early engagement with developers and the public on the methodology prior to commencing the site selection process. The Council have then undertaken a number of steps (a 'sifting' exercise) to determine whether sites are compliant with the strategic policies of the District Plan and then assess individual sites for suitability.

As part of the sifting exercise, the Council identified a short list of 51 sites (as set out in the Sustainability Appraisal 2020), the land west of Imberhorne Lane (SHELAA #770) is included within this short list. The site assessment process then goes further within the SA process both individually and in comparison with other sites.

Generally, Welbeck support the SHELAA assessment of the site, which concludes that the site offers considerable development potential. Additionally, we welcome the acknowledgement of infrastructure improvements that are associated with the proposals, most notably, the secondary school, primary school (and early years), GP, housing for older people and a Strategic SANG. However, Welbeck object to parts of the site assessment which do not reflect the in-depth site assessment undertaken, nor the amendments that have been carried out throughout the site promotion process and in conjunction with the Council, which has resulted in an amendment to the site boundary. These include:



## 1. Ecology

The site assessment suggests that Natural England have concerns regarding high density housing south of Felbridge, however, those representations are a collective response to wider land at Imberhorne Farm (site #770), a site in Crawley Down (site #686) and the additional land at Imberhorne Farm (site #561), which is proposed as a Strategic SANG and not for housing development. Given that the SHLEAA capacity of these sites collectively is 2,800 dwellings, we strongly object to the assessment and advice of Natural England and its use within the SHELAA which is wholly inappropriate as the basis to assess the potential impacts arising from the development of c550 dwellings on the edge of East Grinstead as a standalone site.

We contest the SHELAA assessment of impacts on the Worth Way Local Wildlife Site (LWS) and Hedgecourt SSSI, which conflicts with the findings of the Ecology Report contained herewith. It is acknowledged that Hedgecourt SSSI is a popular local walking route. However, Hedgecourt is approximately 1.9km away from the nearest point of the development proposed on land at Imberhorne Farm. Furthermore, Hedgecourt Lake is separated from the site by the A264, a main road. Alternatively, residents of the proposed development will have access to an onsite Strategic SANG and the Worth Way, so it is highly unlikely that there will be significant recreational use of Hedgecourt Lakes by residents of the proposed development.

The response from Natural England as summarised in the SHELAA site assessment, suggests that there could be harm to the Worth Way Local Wildlife Site, however, the summary also advises that Natural England have no details of the scale or type of the proposed development and have assessed the cumulative impacts of 2,800 dwellings (of which only 550 are allocated) and as such, it must follow that their assessment can be given very little weight. The Worth Way is already a well used recreational route, it is on the national cycle route (Route 21), it provides an important recreational route but also a safe pedestrian and cycle link to the Town Centre, as such, it is not considered that any further recreational use should be discouraged.

Furthermore, the SHELAA assessment only acknowledges the potential for biodiversity net gain within the consultation, it does not include it within the assessment of ecological impacts. The site is farmland and significant open space is proposed, including an onsite Strategic SANG and a range of ecological improvements, this has the potential to offer significant biodiversity net gain. This should be included within the assessment.

We request that MSDC and Natural England review the impacts of the proposed development individually (ie. not in conjunction with other sites, particularly those not promoted for housing development) and in light of the evidence. The SHELAA process is an assessment of individual sites and not of cumulative effects of combined, not allocated sites. This would alter the assessment of the impacts on SSSI/SNCI/LNR, which would

become 'amber', noting the lower level of harm and the potential for mitigation (as concluded on site #686).

## 2. Heritage

Welbeck also object to the Council's assessment of heritage impacts as set out in the SHLEAA, this does not reflect the most recent evidence submitted to the Council, the specialist advice provided to Welbeck by Orion Heritage, or the amendments which have been made to the proposals as part on ongoing dialogue with MSDC's Conservation Officer. Furthermore, the SHLEAA site boundary is wider than the area proposed for allocation, disregarding the removal of the south-west field from the proposals in accordance with feedback from the Council's Heritage Officer.

The SHLEAA assessment states that the development would engulf Imberhorne Farm and Imberhorne Cottages, which would lead to high levels of Less Than Substantial Harm. We do not agree with this assessment, but nonetheless, have amended the concept masterplan prior to the Regulation 19 consultation (and included within the Site Library) to remove development from the field to the west of Imberhorne Farm and Imberhorne Cottages. This will retain a sense of rurality to the remaining farmstead, this is reflected in the latest site allocation boundary and has been agreed by the Council.

Furthermore, the indicative layout for the Care Community has been prepared to retain views of Imberhorne Cottages (the Care Community is proposed as two storey buildings only). Our specialist advisors have therefore concluded that there will be Less than Substantial Harm on the low end of the scale in respect of Imberhorne Farm and Imberhorne Cottages.

Similarly, the Council's SHLEAA assessment concludes that the introduction of housing around Gullege Farm would erode its rural setting resulting in Less Than Substantial Harm on the high end. We strongly disagree. The predominant outlook of Gullege Farmhouse is to the south towards the Worth Way, and not from the north. The concept masterplan and site allocation boundary have been amended to reflect discussions with the Council's Conservation Officer, removing the field between Gullege Farm and Imberhorne Farm, which our specialist advisors conclude would result in only a low level of Less than Substantial Harm.

As such, we respectfully request that MSDC review the evidence submitted in support of the proposals and the changes that have been made since the Regulation 18 proposal as a result of consultation with the Council and consequently reflected in the change in the site allocation boundary.

Notwithstanding the above, we welcome the Council's application of the NPPF (paragraph 196) and balancing the perceived harm to these listed building against

the public benefits of the proposal.

### *Sustainability Appraisal*

Welbeck support the Council's thorough assessment of the 'sifted sites' which subject to minor amendments is a sound evidence base to support the SA DPD.

Following the SHELAA process, the Council have appropriately assessed the sites through the Sustainability Appraisal (SA) categorising the land west of Imberhorne Upper School (Site Ref #770) as one that performs well and should therefore be taken forwards to site allocation. Crucially, this supports the delivery of housing at East Grinstead, to meet the identified residual housing need.

Welbeck support the Council's sustainability appraisal of the site at pages 129 and 130 of the SA (referred to as Option E), acknowledging that the site will positively contribute ('++') towards the residual housing need of East Grinstead.). As a large site, it is also capable of accommodating a range of housing types and sizes, including small family dwellings and affordable housing; the site will also delivery housing for the older population through the proposed Care Community.

In conclusion, the SA (page 130) notes that weight should be afforded to those sites that can contribute towards this residual requirement, where the positives would outweigh the negative impacts, this wholly accords with the presumption in favour of sustainable development set out in the NPPF.

Although we wholly support the SA process and assessment of the land west of East Grinstead (now referred to as land east and south of Imberhorne Upper School), it does not appear to identify the additional positive contributions the proposal will make towards education and health through the delivery of a 2FE primary school, land for Imberhorne Secondary School, a Care Community and GP surgery. Paragraph 3.30 of the SA identifies that primary schools are at 93% capacity in the East Grinstead area, whilst East Grinstead secondary schools are at 89%. The delivery of land for the expansion and consolidation of Imberhorne Secondary School and land for a new primary school, will allow for further capacity within the wider area over and above that required for the site alone. Additionally, Welbeck are committed to delivering a GP surgery where supported by the CCG, which would improve the assessment of the health objective from a negative score to a positive one.

Additionally, it is questioned how sites in Felbridge (SHELAA sites 196 and 595 for example) are stated to have positive regeneration outcomes whereas strategic development at East Grinstead will has a lesser effect on regeneration. Felbridge is a small settlement with minimal services, furthermore, the majority of Felbridge is in Tandridge District and Surrey County and therefore it is questioned what regeneration could be delivered through

these small sites, which would benefit Mid Sussex District. Conversely, strategic development at East Grinstead will positively support the Town Centre through an increase in population and therefore footfall, encouraging new investment in the Town Centre, we therefore submit that the assessment of regeneration impacts arising through the development of land at Imberhorne (Option E) should be enhanced to '++'.

Furthermore, we submit that the assessment of the biodiversity impacts should be improved to at least 'O'. It is acknowledged that the site is adjacent to Ancient Woodland and the Worth Way, a Local Wildlife site, however, there will be no direct impact on these designations as they fall outside the site. Additionally, through the delivery of the proposal, significant landscaped open space will be delivered, including 17ha of formal and informal open space and c40ha of Strategic SANG, both of which will deliver ecological enhancements over the current farmed use of the land. Additionally, the Environmental Bill has had its second reading and is likely to become made legislation over the Plan Period, requiring biodiversity net gains.

#### Policy 35 – Safeguarding of Land for and Delivery of Strategic Highway Improvements

Welbeck support policy SA35 which seeks to safeguard land for, and deliver, strategic highway improvements, and commends MSDC for identifying and seeking to deliver improvements to existing infrastructure, such as local road networks. MSDC have undertaken a sustainability appraisal of the policy and delivery of these improvements, which unsurprisingly gives rise to overwhelming positive outcomes. Welbeck in conjunction with MSDC and WSCC have considered a range of possible highway improvement projects which could be secured through policy SA35 and have provided sufficient evidence to the Highways Authority that these schemes will offer a betterment to future journey times along the corridor; all proposed developments in the area which would have an impact on the A264/A22 corridor would be required to make contributions towards these improvements. The SA DPD does not need to identify the scheme of improvements but be confident that there are schemes which could be delivered, furthermore, to secure the detailed scheme would be inflexible.

Plan making should look to the future and set a framework not only for addressing housing and economic needs, but also social, environmental and infrastructure priorities (paragraphs 15 and 20 of the NPPF). Policy 35 seeks to identify improvements to the A22 Corridor at the Felbridge, Imberhorne Lane and Lingfield junctions; development in and around East Grinstead, including that allocated at policy SA20, will be expected to make contributions towards these strategic highways improvements for the overall betterment of the traffic movement through the Town. Paragraph 22 of the NPPF requires that strategic policies look to a minimum period of 15 years from adoption, to anticipate and respond to long-term requirements, including infrastructure, policy 35 wholly accords with this principle.

#### Conclusion



In summary, Welbeck wholly support Policy SA20 and SA35 of the SA DPD and the evidence base underpinning these policies, which seek to meet the housing and future infrastructure needs of East Grinstead in accordance with the NPPF and the District Plan. It is submitted that the SA DPD accords with the strategic policies of the District Plan and seeks to positively deliver against the residual housing requirement in accordance with the spatial strategy and settlement hierarchy.

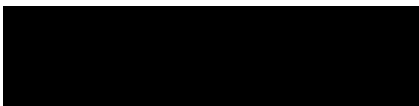
Welbeck believe that the SA DPD is:

- a) **Positively prepared** – it provides a strategy which seeks to meet more than the residual housing requirement in order to ensure flexibility in the market and to account for the potential for some sites not to come forwards, whilst according with the principles of sustainable development by focusing on the most sustainable settlements. It also unlocks land at Imberhorne Lower School, as identified in the EGNP, which is included in the Council's housing trajectory.
- b) **Justified** – the SA DPD is the most appropriate strategy, the Council have reviewed a large pallet of sites and then undertaken further detailed site assessment through the SA process, identifying a suite of sites which perform well individually but also against the spatial distribution set out within the District Plan.
- c) **Effective** – the Council have confirmed with site proponents that sites are deliverable and the SA DPD identifies the delivery timescales for each site. In relation to policy SA20, the Council in consultation with Welbeck have evidenced that the site is capable of being delivered within the plan period.
- d) **Consistent with national policy** – these representations demonstrate how the allocation of land at policy SA20 is consistent with national policy, including additional meeting infrastructure needs (housing for the older population, education, health care, highways, ecology and access to open space).

We submit that policies SA20 and SA35 meet the tests of soundness as set out in the NPPF subject to the minor amendments set out in these representations.

Welbeck would like to be kept up-to-date with the progress of the SA DPD and reserve the right to participate in the forthcoming Examination Hearings. For further information, or to discuss, please contact Katie Lamb on 01293 605192 or [katie.lamb@dmhstallard.com](mailto:katie.lamb@dmhstallard.com).

Yours faithfully



DMH Stallard LLP





1. Pedestrian link to SANG
2. Footpath (3km)
3. Wildlife pond
4. Native tree planting
5. Scrub planting
6. Wildflower meadow
7. Timber benches
8. Potential lookout tower
9. Post and rail fence to SANG boundary
10. Potential location for SANG car park (1 location to be selected)

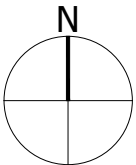
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Revision	Date	Drn	Ckd
G	29.04.20	SP	JdH

**LEGEND**

	Draft Allocation	45.85 Ha
	Site Boundary	
	Additional Land	71.32 Ha
	Proposed SANG area (including strategic SANG)	
	Land Proposed for Imberhorne School Expansion	
	Vehicular access point	
	Pedestrian/ cycle link	
	Residential development	
	Local Centre	
	2FE primary school and community building	
	Care community	
	Public open space	
	Allotments	
	Areas for attenuation	
	Proposed areas for formal play	
	Tree and hedgerow planting (existing and proposed)	
	Street Tree Planting	
	Informal footpath route	
	Retained access to existing farmhouse and bridleway	
	PRoW: Worth Way	

Project  
**Imberhorne Farm  
East Grinstead**  
Drawing Title  
**Concept Masterplan**



Date	Scale	Drawn by	Check by
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Project No	Drawing No	Revision	
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LAND WEST OF  
**IMBERHORNE LANE**  
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LANDSCAPE & VISUAL APPRAISAL | JULY 2020

LAND WEST OF  
**IMBERHORNE LANE**  
COMMUNITY • SUSTAINABILITY • LEGACY





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## 1. LANDSCAPE AND VISUAL BASELINE

## 1.1. APPOINTMENT, PROPOSAL, SCOPE AND LEVEL OF STUDY

**Landscape Architects at Barton Willmore were appointed in June 2020 to update the initial Landscape and Visual Appraisal (LVA) for the site currently known as 'Imberhorne Farm, Imberhorne Lane, East Grinstead', previously prepared in late 2015. (Red highlight in Fig. 1).**

The site is located within the Mid Sussex District Council's administrative area and is being promoted through the planning process for residential-led mixed use development. This LVA is a report of field and desk-based work that through a process of evaluation and analysis has contributed to the refined master planning process. The work has been carried out to support the promotion through the planning process in a manner that establishes the principle of development but not the detail.

This LVA, in terms of its references and focus of study, examines the composition of the landscape and visual baselines of the site and its setting. The landscape baseline comprises the physical components of the landscape including: its form; use; and character. The visual baseline in this study is defined in extent by use of specialist mapping tools that predict areas or 'Zones of Theoretical Visibility' (ZTV) that through analysis enable the extent of the predicted maximum 'Visual Envelope' (VE) to be identified (Section 1.10). The work is at a high level of study but it allows consideration of considerable areas to be evaluated and sieved down to a finer grain of study on the ground. The visual baseline analysis contains informed judgements about who is likely to see the site, their location, their likely activity and some level of prediction about their expectation of the view: i.e. is the view of the site the reason for their enjoyment of the experience: a national or local area of scenic beauty, or is it incidental to a journey or a backdrop to their garden.

This LVA has been prepared to inform a development proposal and to ensure that the promotion of the 'Vision Plan' (Fig. 30) through Representations to Mid Sussex District Council (MSDC) have a robust evidence base. Even at this stage it has been possible to identify or predict the components in the landscape baseline that may experience a change as a consequence of development of the site. These components are called 'Landscape Receptors' (Section 1.12). Similarly, those people that may experience a change in their view of the site, from identified viewpoints, have also been identified and been described as 'Visual Receptors' (Section 1.13). They commonly fit within broad groups sharing a similarity of some regard: near neighbours; commuters; amenity walkers etc.

This stepped approach to the analysis of the landscape and visual baseline of the Site and its setting, from a wide base of data searching down to a Site based description and analysis, enables the identification and recording of a thorough knowledge of the key components that form the character and composition of the Site and its setting. In this LVA the proposed change of use of the Site land, from farmland to settlement, has been tested and modified and iterated through application and testing, building on the earlier analysis and more recent analysis of receptors in the landscape and visual baseline.

At this preliminary stage of study the landscape architects have looked at the relationship between the Site and the settlements of East Grinstead, Felbridge and Crawley Down; at the role the Site plays as a setting for these settlements; and at its relationship within the landscape of the host countryside. The Site is outside a settlement and is within the countryside and the development of the Site would change this categorisation: the Site would become part of the settlement of East Grinstead and would form the edge of the town and the countryside. This important matter is central to the considerations within this LVA.

The desk and field work recorded in this LVA study has been used by the development team specialists that has already contributed to the drafting of early concepts for the development proposal. The LVA work has been applied at these early stages within a strategy that looks to limit effects and to make a development proposal that finds a sympathetic and successful fit in the landscape of its setting.

At this stage the development proposal is for a change of use from farming to a residential-led mixed use development of new homes and public amenity open space. The concepts used for early testing in this LVA are described as the 'Vision Plan'.

The LVA sets out the consideration that has been given to achieving an informed and accurate understanding of the relationship that the site has with its setting. The study has the intended change of use to a residential-led mixed use development that will change the status of the land from countryside to settlement as a clear point of reference for the research work. The containment of the new extent of the settlement and the protection of the countryside are important considerations. This LVA study has HDA the task of formulating advice, drawn from an appropriate knowledge of the landscape and visual baseline, that can provide robust guidance on a sympathetic and successful landscape led development proposal.

The site sits at the northern edge of the High Weald National Character Area. It is not in the High Weald Area of Outstanding Natural Beauty but is less than 2Km from the AONB at its closest point. Nor is the Site within the Green Belt. Although the Green Belt is not a landscape designation three of the five objectives of the statute involve consideration of landscape matters (Section 1.7). The Metropolitan Green Belt extends as far south as Crawley Down Road but does not wash over any part of the Site.

The subtleties and complexities of landscape and settlement and countryside character, of field pattern, the patterns and form of the built environment, and the lines and engineering works of the network of transportation routes have all made marks in this settled and changing High Weald landscape. They all contribute to the consideration of the setting for the development proposal. The judgement of the success or failure of the proposal for change of use that lies behind this LVA work also has to consider how people regard the landscape of the site. The analysis of these and other elements in the landscape and visual baseline of the site and its setting are set out in this LVA.

An important output of this LVA has been the preparation of the Landscape and Visual Key Constraints and Opportunities Plan (Fig. 28). The plan is a graphic map that records some of the main landscape and visual assets, detractors, constraints and opportunities. Analysis of these landscape and visual issues, considered in combination with the information documented in this study, has been applied to the drafting of the Vision Plan (Fig. 30). The Vision Plan shows an indication of an initial outline concept for the development proposal. It has flowed from this landscape led approach. Consideration of the existing heritage assets: the listed buildings and Scheduled Monuments at Imberhorne Farm, at Gulledege and the moat west of Avenue Wood, in Felbridge, has been given at a high level with further work to be undertaken by appropriately qualified experts. The process of mitigation that designs out harmful impacts through knowledge of the baseline and the sensitivities of its constituent elements, has therefore, been an integral process within the evolution of the initial development concept.

- In summary, the key landscape and visual issues, in consideration of the potential development of the site, that are examined in Part 2 of this LVA, include:
- The site's physical containment at the countryside edge;
- The site's visual containment at the countryside edge;
- The site's effect of the proposed development on the character and appearance of the area
- The site's relationship with the settlement edges of East Grinstead, Felbridge, and Crawley Down, and
- The capacity of the Site to accommodate development without harm to the landscape of the setting.



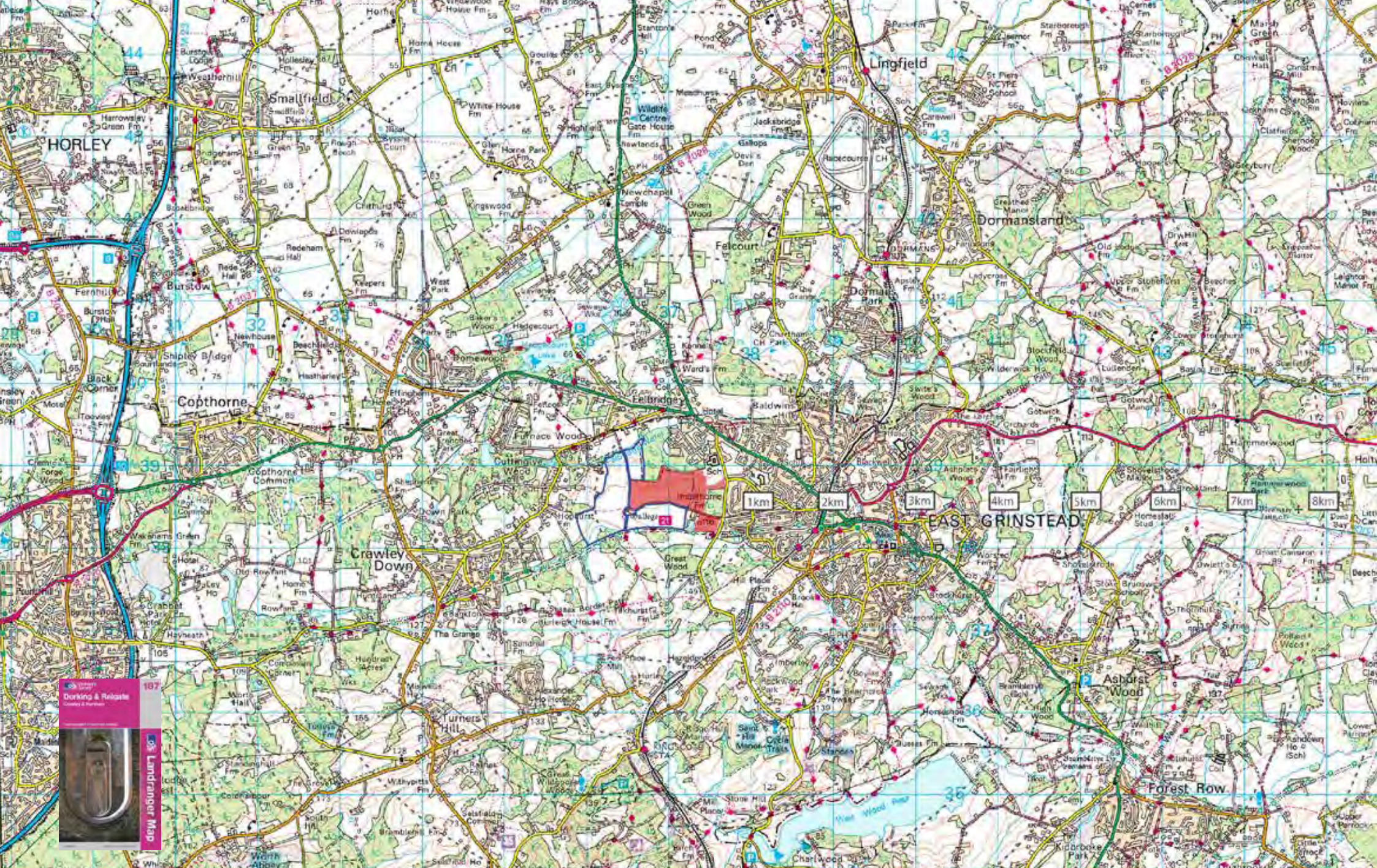


FIGURE 1. OS 1:50,000 LANDRANGER MAP 187: SEPTEMBER 2015. SITE LOCATION PLAN





On PRoW (East Grinstead 44bEG-1) looking north-east to Imberhorne Farm







## 1.2. LVA METHODOLOGY

The structure of this study follows the current best practice approach set out in the principal publication for LVA work: 'Guidelines for Landscape and Visual Impact Assessment', Third edition (GLVIA. [Landscape Institute and Institute of Environmental Management and Assessment. 2013]). The Institute gives guidelines for the process of Landscape and Visual Assessment.

The Third edition of the GLVIA set out a differential between Landscape and Visual Impact Assessment (LVIA) and Landscape and Visual Appraisal (LVA) studies. The LVIA study sits within the Environmental Impact Assessment (EIA) process and the assessment of specific effects that may cause impacts on components and receptors in the landscape and visual baseline. The LVIA centres on assessment of effects. The preparation of Landscape and Visual Appraisal studies – such as this study for the site at Imberhorne Farm, has the rigour of the EIA process but has looked to identify issues of possible harm that might arise from the development proposal and offset them through change and modification of the proposals before a fix of the proposal – this LVA has been devised as tool or body of information that will inform an evolving proposal rather than an assessment of a finalised proposal. This LVA study is not however part of a formal Environmental Statement and it is therefore described as an appraisal.

The LVA process is non-prescriptive, and experienced practitioners are required to make informed objective, and subjective judgments in the process of assessment of environmental effects. In this study a structured approach consistent with good practice has been followed (Fig. 2). In overview this document is a report of research undertaken, recorded and set out with a sub-division into three main parts:

- Part 1: Baseline studies

Part 1 sets out the landscape and visual baselines and is a record of the field based study of the site and its setting. It includes a record of the desk based data trawl of published landscape character studies; identifies landscape and visual receptor groups.

- Part 2: Analysis, Development proposal, and Capacity

Part 2 defines the main landscape and visual issues concerning the character of the site and its setting and the relationship with the development proposal, a key output is the baseline-led analysis contained in the Landscape and Visual Key Constraints and Opportunities Plan;

- Contains a description of the substance of the development proposal as a response to the potential interactions that may be caused to the landscape and visual receptors. It looks at the analysis-led development concept as a Vision Plan, suggesting mitigation as an inclusive process within the iteration of the development proposals;
- Records and gives commentary on the published landscape capacity studies for the Site and the setting.

- Part 3: Summary and Conclusions

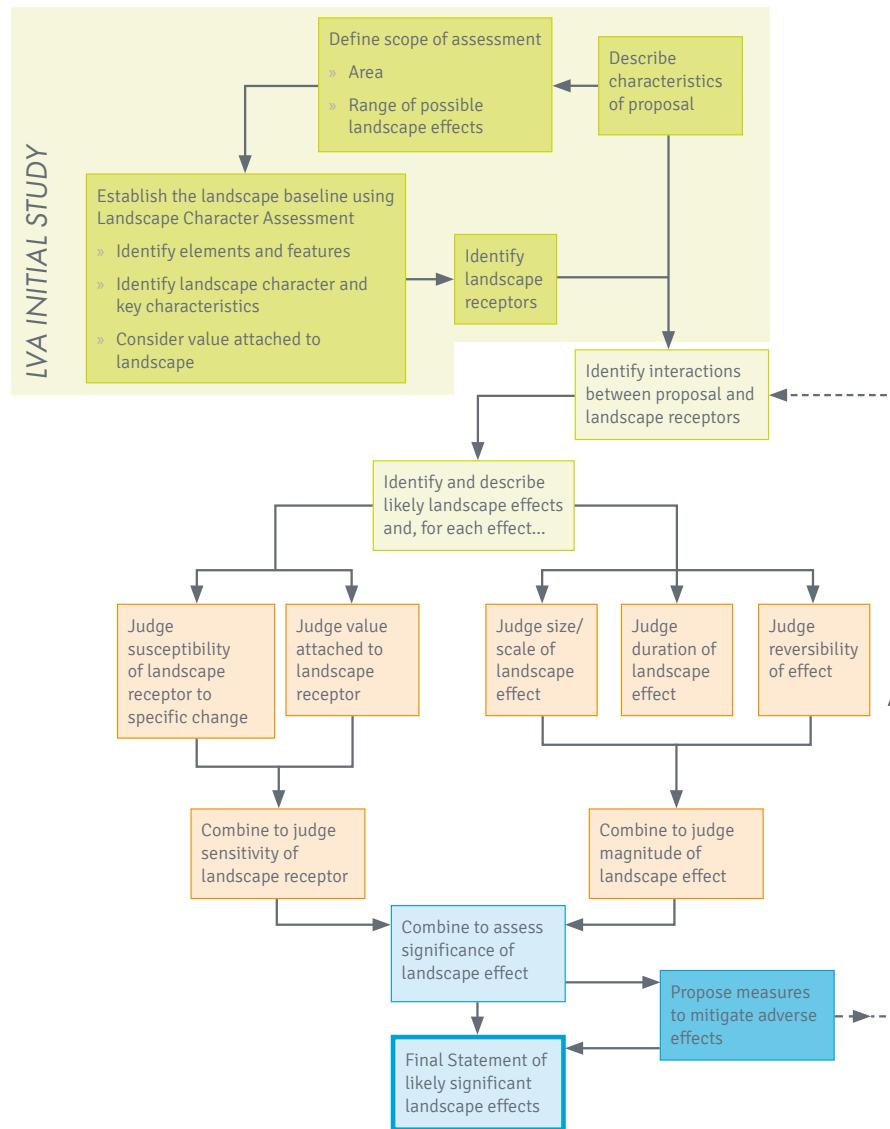


FIGURE 2. GLVIA STEPS IN ASSESSING LANDSCAPE EFFECTS (GLVA FIGURE 5.1)

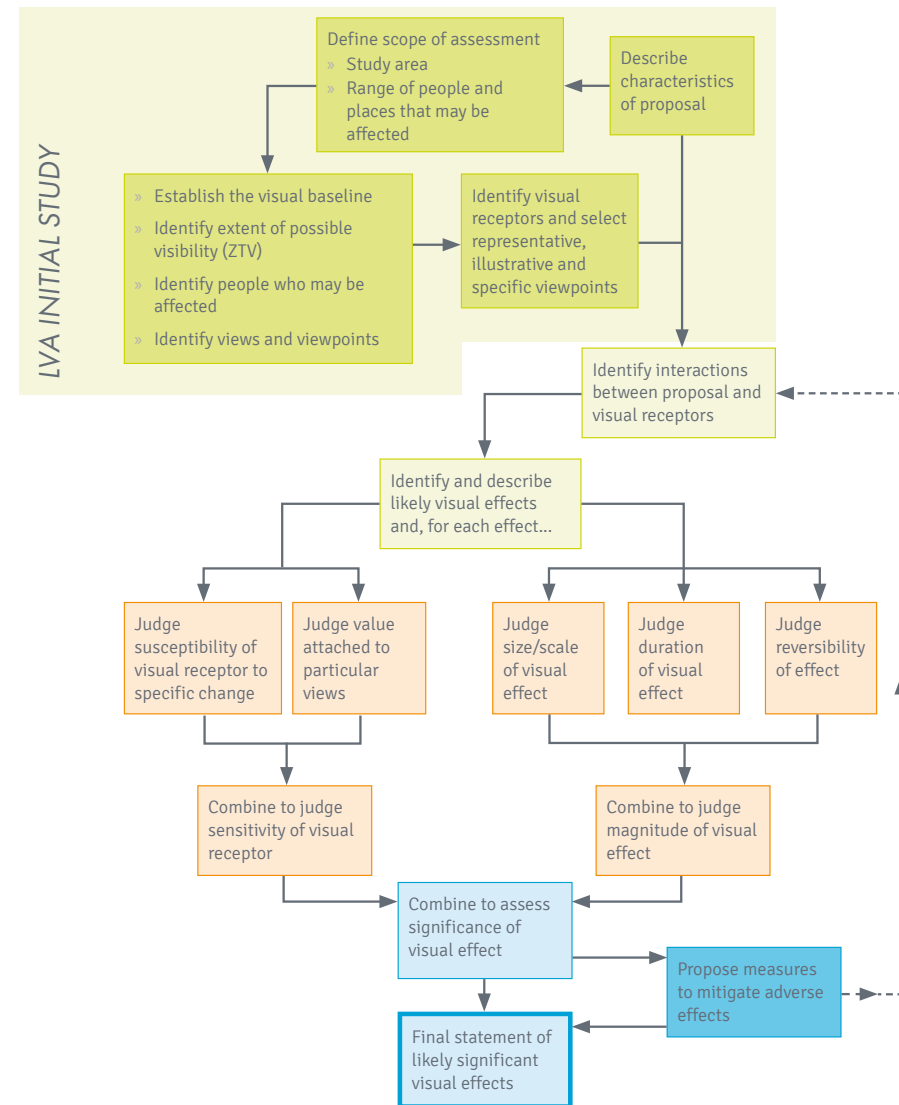


FIGURE 3. GLVIA STEPS IN ASSESSING VISUAL EFFECTS (GLVA FIGURE 6.1)

### 1.3. THE LANDSCAPE BASELINE OF THE SETTING IN OVERVIEW

The Site is located on the western edge of East Grinstead, in the district of Mid Sussex (Fig. 4). In general terms the edge of East Grinstead is characterised by modern, late 20th century housing and large scale industrial buildings (Photos: 2, 4, 11 + Aerial photo).

The landscape is crossed by rivers, streams and numerous watercourse which have influenced its landform, resulting in a series of ridges and valleys. The land to the south of the Site gently rises to form a ridge, the landform to the north of the Site slopes gently to form a wide river valley. Further to the north beyond the valley, the landform rises, and a ridge runs in a broadly east west orientation (Figs. 11, 12). The settlements of Reigate, Redhill, Godstone, Oxted and Limpsfield are located along this ridge line.

It is a well wooded landscape, with multiple blocks and belts of mature woodland scattered across the landscape. There is a substantial amount of woodland located around the settlement of Crawley to the west of the Site. Ashdown Forest, an area of Ancient woodland which occupies a ridge top within the High Weald Area of Outstanding Natural Beauty (AONB), is located approximately 6km to the south east of the Site.

The settlements of East Grinstead and Crawley are connected by the A264 which runs to the north of the Site (Fig. 1). In the wider setting, a network of roads cut across the area. The M23 motorway runs in a broadly north south orientation around the outskirts of Crawley, and it confluences with the M25 motorway at Junction 8 just north of Redhill.

Around the Site there is a network of Public Rights of Way (PRoW), the bridleway (44bEG) which crosses the Site emerges from the centre of East Grinstead through the Site and on towards Gulledge Farm. At this location it splits, a spur travels west towards the settlement of Crawley Down, another travels north towards Felbridge and the final spur travels south where it joins the Worth Way Long Distance Route (Fig 4).



WORTH WAY/SUSSEX BORDER PATH - UNDER IMBERHORNE LANE ROAD BRIDGE



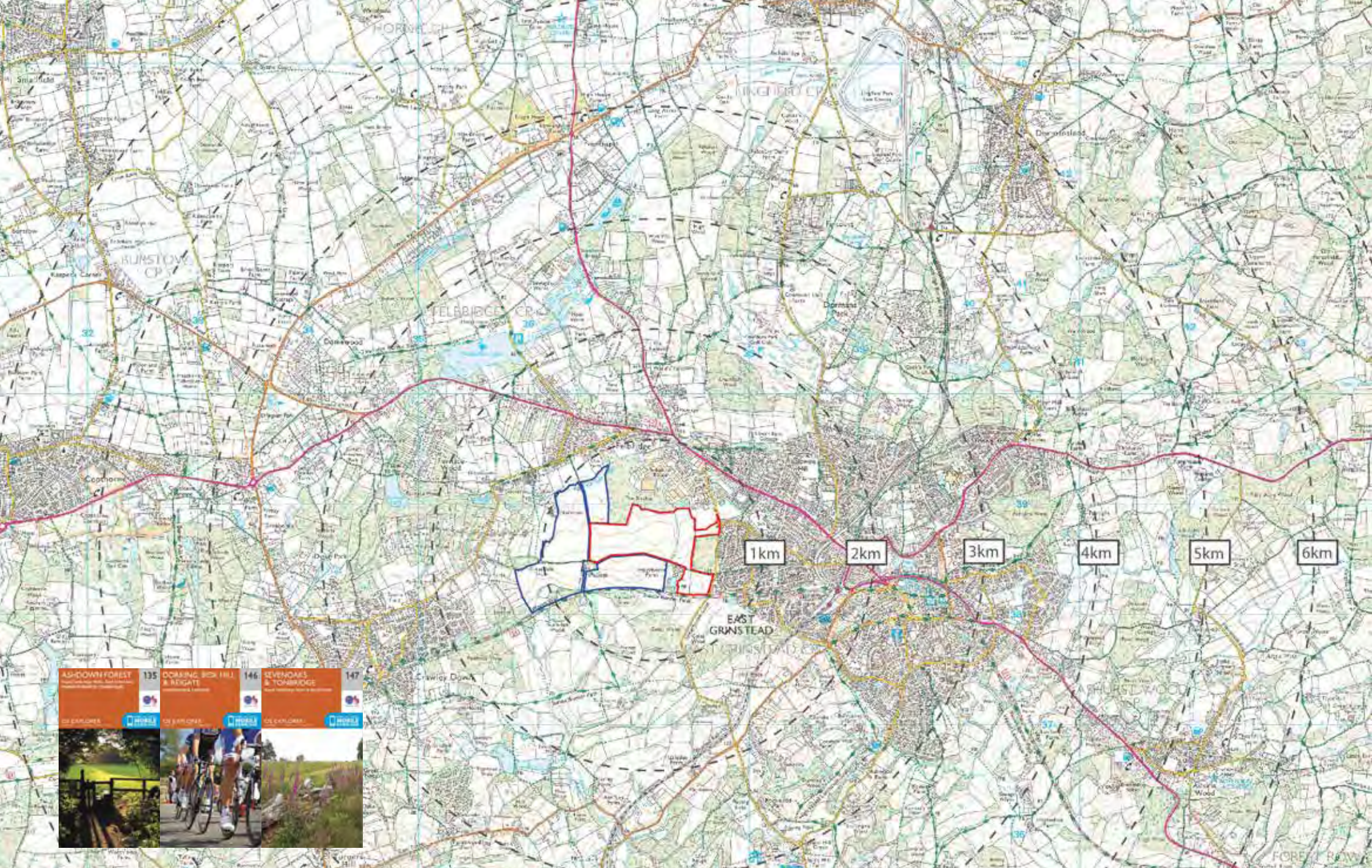


FIGURE 4. OS 125,000 EXPLORER MAPS 135, 146, 147: SEPTEMBER 2015. SITE LOCATION PLAN



## 1.4. THE LANDSCAPE BASELINE OF THE SITE IN OVERVIEW

The Site is comprised of a series of large scale geometric fields divided by hedgerows, many of which contain hedgerow trees. Imberhorne Farm is located in the southern portion of the Site, but is not within the Site. The Site boundary runs round the farm complex, its associated outbuildings and private grounds, to exclude it from the Site.

Within the Site the landform falls from a high point in the southeast corner of the Site at 130m Above Ordnance Datum (AOD), to a low point of approximately 90m AOD along the northern boundary of the Site (Fig. 12). Across the length of the Site the land undulates gently influenced by a small tributary watercourse which runs from Imberhorne Farm towards the northern boundary of the Site.

The Birches Ancient Woodland lines the northern boundary of the Site (Fig. 5 + Photo 2). The eastern boundary of the Site is lined by dense hedgerow vegetation, a permissive path runs alongside a portion of this boundary of the Site. The southern end of the eastern boundary is adjacent to Imberhorne Lane (Photo 10). The southern boundary runs along the route of A Public Bridgeway (44bEG) which is lined on both sides, in part, by hedgerow vegetation (Photo 5). A large open elevated field is located to the immediate south, with the Worth Way/Sussex Border Long Distance Route (Photo 9) running east-west to the south of the field, set within well-established vegetation. The western boundary of the Site extends to the bridleway that runs north from the Worth Way/Sussex Border Long Distance Route (Photo 7).

A Public Right of Way bridleway (44bEG) crosses through the central portion of the Site. It is occasionally very open but also has places where it is lined on both sides by vegetation, which includes hedgerow trees. The path also serves as the drive to Gulleage and as a farm access as well as a PRoW; and runs in a broadly east west orientation (Photos 2, 3, 5).

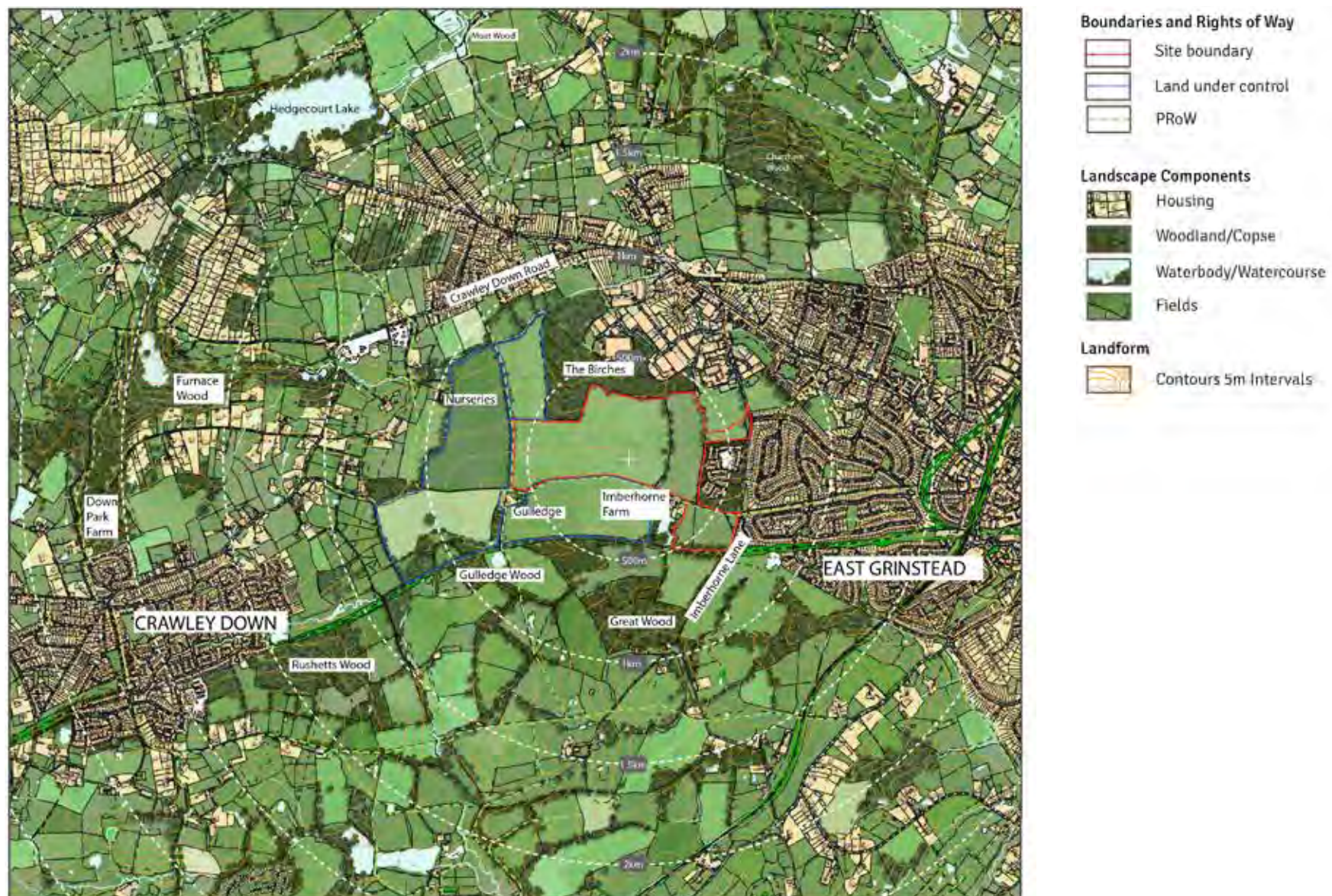


FIGURE 5. LANDSCAPE BASELINE



## 1.5. LANDSCAPE CHARACTER: KEY RELEVANT CHARACTERISTICS AT NATIONAL, COUNTY, AND DISTRICT SCALES

### National level Landscape Character Assessment

As part of Natural England's responsibilities in delivering the Natural Environment White Paper, Biodiversity 2020 and the European Landscape Convention, Natural England has developed a series of National Character Area (NCA) profiles.

The Site and surrounding landscape is situated within NCA Profile 122: High Weald (Fig.6).

The key characteristics of the High Weald NCA are outlined as follows:

- "Church towers and spires on the ridges are an important local landmark. There is a dense network of small, narrow and winding lanes, often sunken and enclosed by high hedgerows or woodland strips;
- An intimate, hidden and small-scale landscape with glimpses of far-reaching views, giving
- a sense of remoteness and tranquillity yet concealing the highest density of timber-framed buildings anywhere in Europe amidst lanes and paths;
- Strong feeling of remoteness due to very rural, wooded character. A great extent of interconnected ancient woods, steep-sided gill woodlands, wooded heaths and shaws in generally small holdings with extensive archaeology and evidence of long-term management;
- Extensive broadleaved woodland cover with a very high proportion of ancient woodland with high forest, small woods and shaws, plus steep valleys with gill woodland;
- Small and medium-sized irregularly shaped fields enclosed by a network of hedgerows and wooded shaws, predominantly of medieval origin and managed historically as a mosaic of small agricultural holdings typically used for livestock grazing;

- A predominantly grassland agricultural landscape; and
- An essentially medieval landscape reflected in the patterns of settlement, fields and woodland"

### County level Landscape Character Assessment

The Landscape Character Assessment of West Sussex was published in 2003. The Site is located within Landscape Character Area (LCA) HW1: The High Weald (Fig. 7).

Key Characteristics of the LCA relevant to the Site are:

- "Wooded, confined rural landscape of intimacy and complexity;
- Plateau, ridges and deep, secluded valleys cut by gill streams;
- Long views over the Low Weald to the downs, particularly from the high Forest Ridge;
- Significant woodland cover, a substantial portion of it ancient, and a dense network of shaws, hedgerows and hedgerow trees;
- Pattern of small, irregular-shaped assart fields, some larger fields and small pockets of remnant heathland;
- Dense network of twisting, deep lanes, droveways, tracks and footpaths;
- Dispersed historic settlement pattern on high ridges, hilltops and high ground, the principal settlements East Grinstead; and
- Varied traditional rural buildings built with diverse materials including timber-framing, Wealden stone and varieties of local brick and tile hanging."



FIGURE 6. LANDSCAPE CHARACTER: NATIONAL CHARACTER AREA (NCA) 122





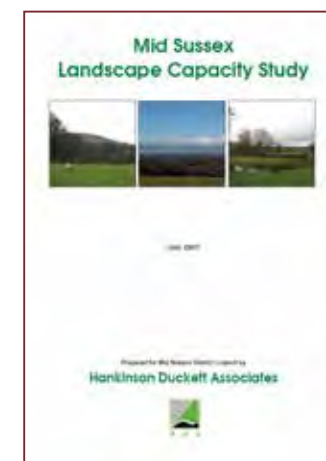
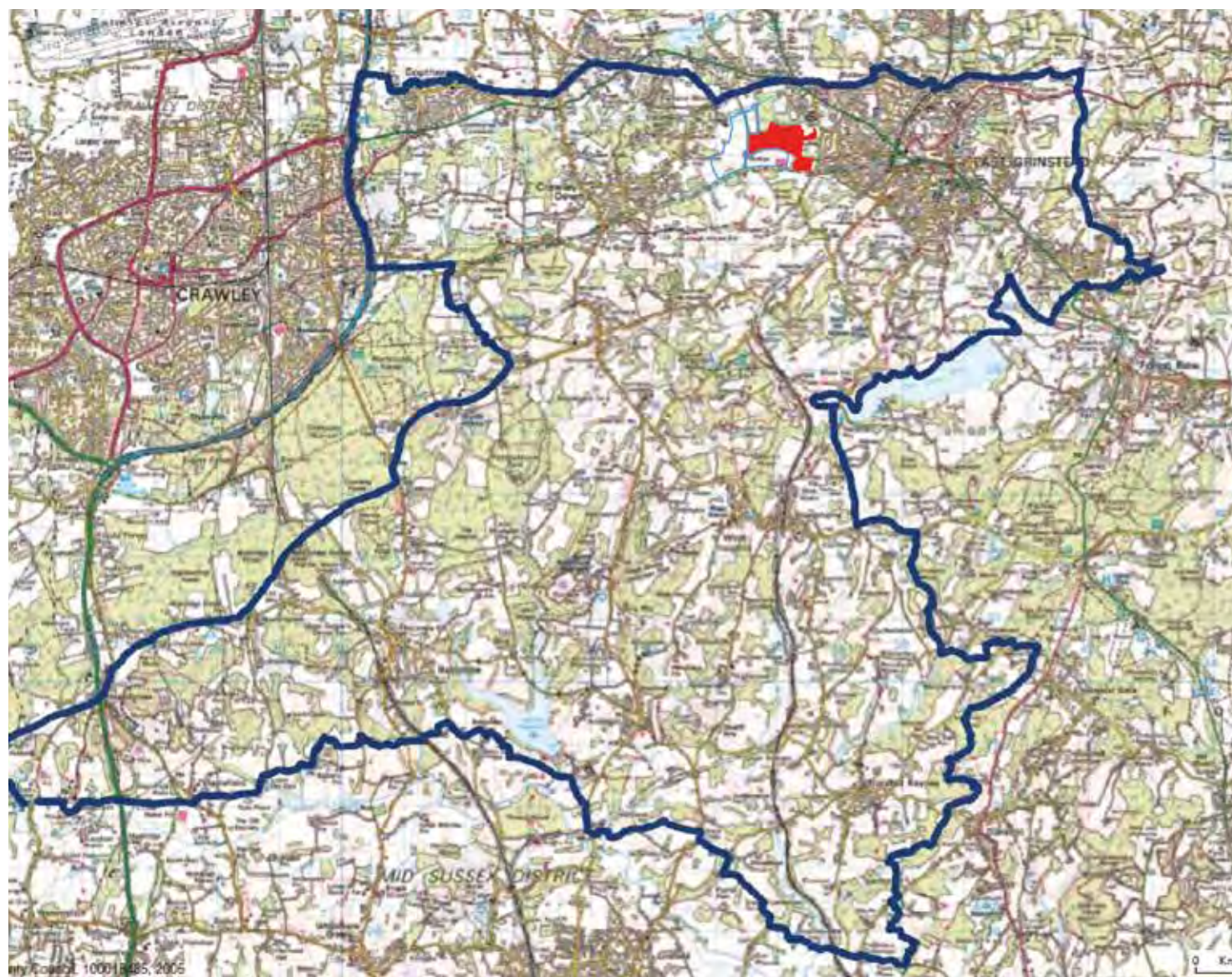
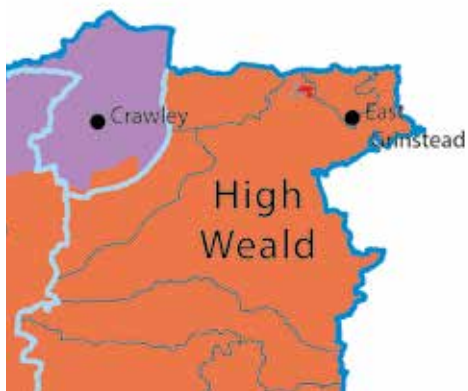


FIGURE 7. CHARACTER: COUNTY CHARACTER AREA: HW1 HIGH WEALD



### District level Landscape Character Assessment

A Landscape Character Assessment for Mid Sussex published in November 2005 identifies the Site as being located within Landscape Character Area (LCA) 6: High Weald (Fig. 8).



**FIGURE 8. LANDSCAPE CHARACTER:**  
**DISTRICT CHARACTER AREA: LANDSCAPE**  
**CHARACTER AREA 6 HIGH WEALD**



Key Characteristics of the LCA relevant to the Site are:

- "Wooded, confined rural landscape of intimacy and complexity, perceived as attractive, locally secluded and tranquil;
- Complex sandstone and clay hilly landscape of ridges and secluded valleys;
- Long views over the Low Weald to the downs, particularly from the high Forest Ridge;
- Significant woodland cover, a substantial portion of it ancient, including some larger woods and a dense network of hedgerows and shaws, creates a sense of enclosure, the valleys damp, deep and secluded;
- Dense network of twisting, deep lanes, droveways, tracks and footpaths;
- Dispersed historic settlement pattern on high ridges, hilltops and high ground, the principal settlements East Grinstead;
- Some busy lanes and roads including along the Crawley–East Grinstead corridor; and
- London to Brighton Railway Line crosses the area."







GULLEDGE BRIDLEWAY LOOKING NORTH



## 1.6. LANDSCAPE CHARACTER OF THE SITE

The Site was covered in the Mid Sussex Landscape Capacity Study, 2007, the initial stages of which involved the undertaking of field surveys across the district; this then led to the identification of the land within the Site as;

### Weald enclosed, large-scale arable

Landscape Character Types and in some locations sub- types (Fig. 9 + extract Fig. 10).

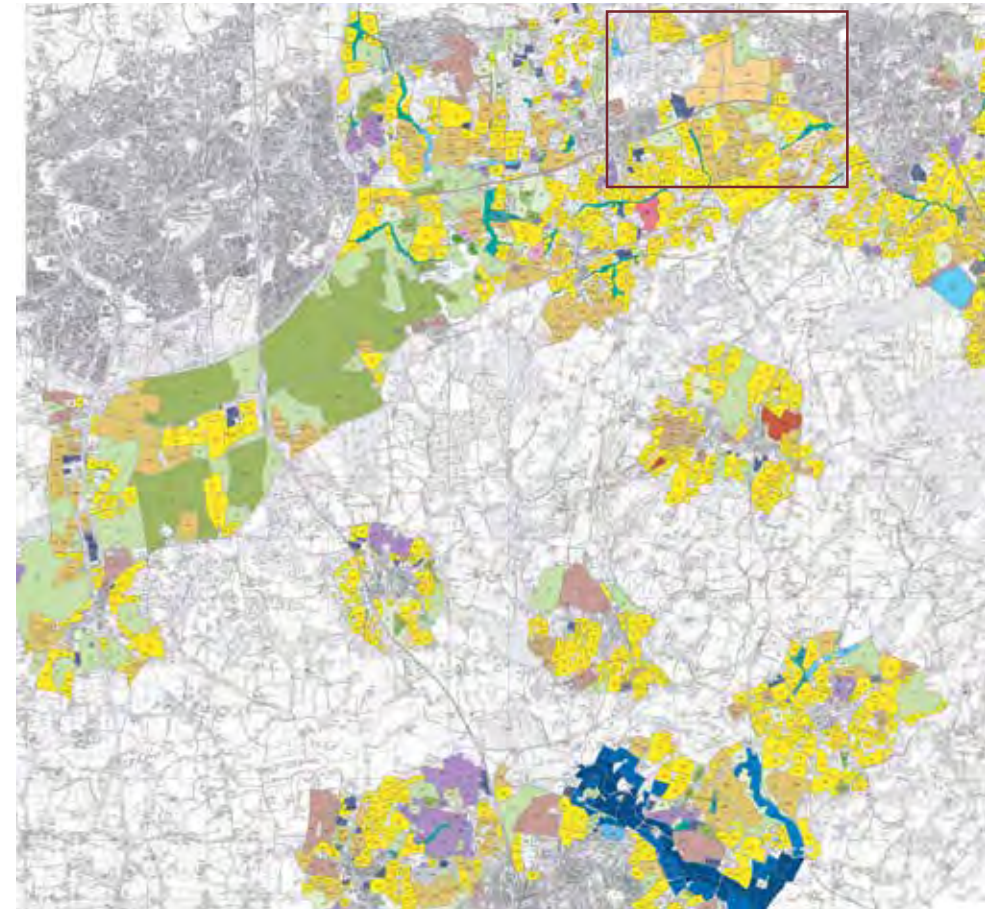
- *"Intensive arable farmland;*
- *Fields, often large, across relatively flat or gently undulating landform; and*
- *Well developed structure of hedges, shaws, copses and woodland which break up views across it and give a sense of large-scale enclosure."*

### Weald open, large scale arable

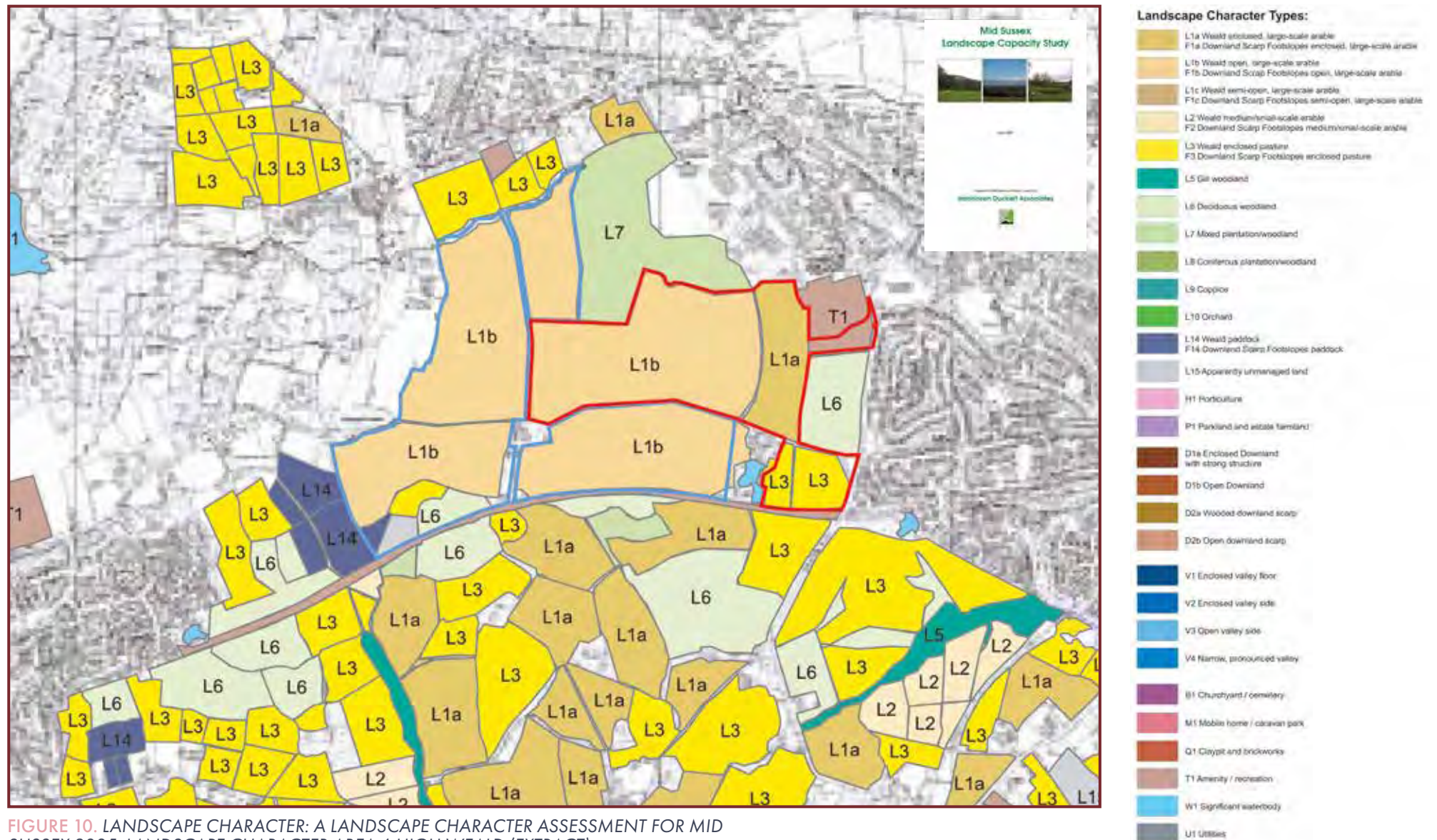
- *"Intensive arable farmland;*
- *Relatively large fields across relatively flat or very gently undulating landform;*
- *Breaks in boundaries allow views of wider landscape;*
- *Weak/ remnant hedgerow structure in places, with few mature trees; and*
- *Some long views to the downs to the south and High Weald to the north."*

### Weald enclosed pasture

- *"Pasture bounded by hedgerows, shaws and/ or copses;*
- *Flat or gently undulating land; and*
- *Field sizes vary."*



**FIGURE 9. LANDSCAPE CHARACTER: A LANDSCAPE CHARACTER ASSESSMENT FOR MID SUSSEX 2005: LANDSCAPE CHARACTER AREA 6 HIGH WEALD**





## 1.7. LANDSCAPE PLANNING POLICY: NATIONAL AND DISTRICT, AND LANDSCAPE DESIGNATIONS

### National Planning Policy Framework (2019)

The revised 2019 NPPF aims to provide one concise document which sets out the Government's planning policies for England, refining the 2012 NPPF. It aims to provide a planning framework within which the local community and local authorities can produce distinctive local plans which respond to local needs and priorities.

The NPPF promotes a presumption in favour of sustainable development, defined as ***"meeting the needs of the present without compromising the ability of future generations to meet their own needs"*** (paragraph 7), and providing it is in accordance with the relevant up-to-date Local Plan, and policies set out in the NPPF including those identifying restrictions with regard to designated areas. The NPPF states that ***"the purpose of the planning system is to contribute to the achievement of sustainable development"*** and that there are three overarching objectives, that is economic, social and environmental, that should be delivered through the preparation and implementation of policies in the NPPF. The role of the environment is described as ***"to contribute to protecting and enhancing our natural, built and historic environment; including making efficient use of land, helping to improve biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change"*** (paragraph 8).

Chapter 12 of the NPPF provides guidance on ensuring the delivery of good design, with paragraphs 124-132 focusing on achieving well-designed spaces and seeking to promote good design of the built environment. The NPPF requires development proposals to respond to local character and be visually attractive, as well as emphasising the need to integrate development proposals into the natural environment. Paragraph 127 of the NPPF states that planning policies and decisions should aim to ensure that developments:

- *"will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;*
- *are visually attractive as a result of good architecture, layout and appropriate and effective landscaping;*
- *are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities);*
- *establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit;.."*

Paragraph 130 states that development should be refused if it fails to take the opportunities available for improving the character and quality of an area and the way it functions.

Chapter 15 refers to conserving and enhancing the natural environment and states, at Paragraph 170, that planning policies and decisions should contribute to and enhance the natural and local environment by:

- a) *"protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan);*
- b) *recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland;"*

### Planning Practice Guidance

To support the policies of the NPPF, the Government has produced Planning Practice Guidance (PPG) covering a number of topics, including the Natural Environment and Lighting.

PPG on the Natural Environment, under heading Green Infrastructure acknowledges that Green and Blue Infrastructure can contribute to enhanced wellbeing, outdoor recreation and access, enhanced biodiversity and landscapes, food and energy production, urban cooling, and the management of flood risk, and identifies that Green and Blue Infrastructure supports the following benefits: Building a strong, competitive economy; Achieving well-designed places; Promoting healthy and safe communities; Mitigating climate change, flooding and coastal change; and Conserving and enhancing the natural environment.

Under heading Biodiversity, the PPG supports the conservation and enhancement biodiversity and geodiversity; and recognises that proposals for development can contribute positively to this and contribute to habitat connectivity in the wider area.

Under sub-heading Landscape, PPG supports the use of landscape character assessment as a tool for understanding local distinctiveness and Natural England's guidance on landscape character assessment.

PPG on Light Pollution refers to the risk of artificial lighting undermining the enjoyment of the countryside and night sky and provides guidance for mitigation-by-design of artificial lighting.





WORTH WAY LONG DISTANCE ROUTE



## District Planning Policy

### Mid Sussex Local Plan (March 2018)

The Mid Sussex Local Plan was adopted on 28th March 2018 and is part of the development plan for Mid Sussex. The Plan sets out policies and specific proposals for the development and use of land to guide planning decisions, along with supporting Supplementary Planning Documents.

- Policy DP12: Protection and Enhancement of Countryside

The Strategic Objective relevant to Policy DP12 are:

***“3) To protect valued landscapes for their visual, historical and biodiversity qualities;***

***11) To support and enhance the attractiveness of Mid Sussex as a visitor destination; and***

***15) To create places that encourage a healthy and enjoyable lifestyle by the provision of first class cultural and sporting facilities, informal leisure space and the opportunity to walk, cycle or ride to common destinations.”***

Policy DP12 states that:

***“The countryside will be protected in recognition of its intrinsic character and beauty. Development will be permitted in the countryside, defined as the area outside of built-up area boundaries on the Policies Map, provided it maintains or where possible enhances the quality of the rural and landscape character of the District, and:***

- ***it is necessary for the purposes of agriculture; or***
- ***it is supported by a specific policy reference either elsewhere in the Plan, a Development Plan Document or relevant Neighbourhood Plan.***

***Agricultural land of Grade 3a and above will be protected from non-agricultural development proposals. Where significant development of agricultural land is demonstrated to be necessary, detailed field surveys should be undertaken and proposals should seek to use areas of poorer quality land in preference to that of higher quality.***

***The Mid Sussex Landscape Character Assessment, the West Sussex County Council Strategy for the West Sussex Landscape, the Capacity of Mid Sussex District to Accommodate Development Study and other available landscape evidence (including that gathered to support Neighbourhood Plans) will be used to assess the impact of development proposals on the quality of rural and landscape character.***

***Built-up area boundaries are subject to review by Neighbourhood Plans or through a Site Allocations Development Plan Document, produced by the District Council.***

***Economically viable mineral reserves within the district will be safeguarded.”***

The Mid Sussex Landscape Character Assessment, the West Sussex County Council Strategy for the West Sussex Landscape, the Capacity of Mid Sussex District to Accommodate Development Study and other available landscape evidence (including that gathered to support Neighbourhood Plans) will be used to assess the impact of development proposals on the quality of rural and landscape character.

- DP13: Preventing Coalescence

The Strategic Objectives relevant to Policy DP13 are:

***“2) To promote well located and designed development that reflects the District’s distinctive towns and villages, retains their separate identity and character and prevents coalescence.”***

Policy DP13 states that:

***“The individual towns and villages in the District each have their own unique characteristics. It is important that their separate identity is maintained. When travelling between settlements people should have a sense that they have left one before arriving at the next.***

***Provided it is not in conflict with Policy DP12: Protection and Enhancement of the Countryside, development will be permitted if it does not result in the coalescence of settlements which harms the separate identity and amenity of settlements, and would not have an unacceptably urbanising effect on the area between settlements.”***

The Site is situated on the western edge of East Grinstead, with the settlements of Crawley Down, Turners Hill, Copthorne and Crawley located to the west of East Grinstead. The setting of towns and villages are as important as the buildings and spaces within them to their overall character. A clear visual break between settlements gives them a recognisable structure. If development was to occur in such areas it could lead to the coalescence of settlements and the loss of their individual identity and amenity.

- DP16: High Weald Area of Outstanding Natural Beauty

The Strategic Objectives relevant to Policy DP16 are:

***“3) To protect valued landscapes for their visual, historical and biodiversity qualities; and***

***11) To support and enhance the attractiveness of Mid Sussex as a visitor destination.”***

Policy DP16 states that:

***“Development within the High Weald Area of Outstanding Natural Beauty (AONB), as shown on the Policies Maps, will only be permitted where it conserves or enhances natural beauty and has regard to the High Weald AONB Management Plan, in particular;***

- ***the identified landscape features or components of natural beauty and to their setting;***
- ***the traditional interaction of people with nature, and appropriate land management;***
- ***character and local distinctiveness, settlement pattern, sense of place and setting of the AONB; and***
- ***the conservation of wildlife and cultural heritage.***

....

***Development on land that contributes to the setting of the AONB will only be permitted where it does not detract from the visual qualities and essential characteristics of the AONB, and in particular should not adversely affect the views into and out of the AONB by virtue of its location or design.”***

- DP17: Ashdown Forest Special Protection Area (SPA) and Special Area of Conservation (SAC)

The Habitats Regulations Assessment for the District Plan identifies that proposed new housing in areas close to Ashdown Forest is likely to increase the number of visitors, with associated impacts on bird populations. This ‘zone of influence’ is within a 7km straight-line distance from the boundary of the Ashdown Forest identified from the ‘Visitor Access Patterns on Ashdown Forest’ survey published in October 2009. For this reason, it will be important to counter any adverse effects from new residential



development in this zone, and to put in place appropriate measures which reduce visitor pressure. The Site falls within the 7km zone of influence surrounding Ashdown Forest.

The Strategic Objectives relevant to Policy DP17 are:

***“3) To protect valued landscapes for their visual, historical and biodiversity qualities.”***

Policy DP17 states that:

*“In order to prevent adverse effects on the Ashdown Forest SPA and SAC, new development likely to have a significant effect, either alone or in combination with other development, will be required to demonstrate that adequate measures are put in place to avoid or mitigate any potential adverse effects. ...*

*Within a 7km zone of influence around the Ashdown Forest SPA, residential development leading to a net increase in dwellings will be required to contribute to mitigation through:*

- 1) *The provision of Suitable Alternative Natural Greenspace (SANG) to the minimum level of 8Ha per 1,000 net increase in population; or a financial contribution to SANGs elsewhere; or the provision of bespoke mitigation; and*
- 2) *A financial contribution to the Ashdown Forest Strategic Access Management and Monitoring (SAMM) Strategy.*

*Large schemes proposed adjacent or close to the boundary of the 7km zone of influence may require mitigation for the SPA. Such proposals for development will be dealt with on a case-by-case basis.*

*Where bespoke mitigation is provided, these measures will need to be in place before occupation of development and must be managed and maintained in perpetuity. The effectiveness of such mitigation will need to be demonstrated prior to approval of the development. Bespoke mitigation will need to be discussed and agreed by the District Council as the competent authority following advice from Natural England.”*

- DP22: Rights of Way and other Recreational Routes

The Strategic Objectives relevant to Policy DP22 are:

*“5) To create and maintain easily accessible green infrastructure, green corridors and spaces around and within the towns and villages to act as wildlife corridors, sustainable transport links and leisure and recreational routes; and*

*15) To create places that encourage a healthy and enjoyable lifestyle by the provision of first class cultural and sporting facilities, informal leisure space and the opportunity to walk, cycle or ride to common destinations.”*

Policy DP22 states that:

*“Rights of way, Sustrans national cycle routes and recreational routes will be protected by ensuring development does not result in the loss of or does not adversely affect a right of way or other recreational routes unless a new route is provided which is of at least an equivalent value and which does not sever important routes.*

*Access to the countryside will be encouraged by:*

- *Ensuring that (where appropriate) development provides safe and convenient links to rights of way and other recreational routes;*

- *Supporting the provision of additional routes within and between settlements that contribute to providing a joined up network of routes where possible;*
- *Where appropriate, encouraging making new or existing rights of way multi-functional to allow for benefits for a range of users. (Note: ‘multi-functional will generally mean able to be used by walkers, cyclists and horse-riders).’*

- DP26: Character and Design

The Strategic Objectives relevant to Policy DP26 are:

*“2) To promote well located and designed development that reflects the District’s distinctive towns and villages, retains their separate identity and character and prevents coalescence;*

*4) To protect valued characteristics of the built environment for their historical and visual qualities;*

*12) To support sustainable communities which are safe, healthy and inclusive; and*

*14) To create environments that are accessible to all members of the community.”*

Policy DP26 states that:

*“All development and surrounding spaces, including alterations and extensions to existing buildings and replacement dwellings, will be well designed and reflect the distinctive character of the towns and villages while being sensitive to the countryside. All applicants will be required to demonstrate that development:*

- *is of high quality design and layout and includes appropriate landscaping and greenspace;*

- *contributes positively to, and clearly defines, public and private realms and should normally be designed with active building frontages facing streets and public open spaces to animate and provide natural surveillance;*
- *creates a sense of place while addressing the character and scale of the surrounding buildings and landscape;*
- *protects open spaces, trees and gardens that contribute to the character of the area;*
- *protects valued townscapes and the separate identity and character of towns and villages;*
- *does not cause significant harm to the amenities of existing nearby residents and future occupants of new dwellings, including taking account of the impact on privacy, outlook, daylight and sunlight, and noise, air and light pollution (see Policy DP29);*
- *creates a pedestrian-friendly layout that is safe, well connected, legible and accessible;*
- *incorporates well integrated parking that does not dominate the street environment, particularly where high density housing is proposed;*
- *positively addresses sustainability considerations in the layout and the building design;*
- *take the opportunity to encourage community interaction by creating layouts with a strong neighbourhood focus/centre; larger (300+ unit) schemes will also normally be expected to incorporate a mixed use element;*
- *optimises the potential of the site to accommodate development.”*

- DP34: Listed Buildings and Other Heritage Assets

The Strategic Objectives relevant to Policy DP34 are:

*“2) To promote well located and designed development that reflects the District’s distinctive towns and villages, retains their separate identity and character and prevents coalescence;*

*4) To protect valued characteristics of the built environment for their historical and visual qualities; and*

*11) To support and enhance the attractiveness of Mid Sussex as a visitor destination.”*

With regard to Listed Buildings, Policy DP34 states that:

*“Development will be required to protect listed buildings and their settings. This will be achieved by ensuring that:*

- *A thorough understanding of the significance of the listed building and its setting has been demonstrated. This will be proportionate to the importance of the building and potential impact of the proposal; ...*
- *Special regard is given to protecting the setting of a listed building; ...”*

- DP37: Trees, Woodland and Hedgerows

The Strategic Objectives relevant to Policy DP27 are:

*“3) To protect valued landscapes for their visual, historical and biodiversity qualities;*

*4) To protect valued characteristics of the built environment for their historical and visual qualities; and*

*5) To create and maintain easily accessible green infrastructure, green corridors and spaces around and within the towns and villages to act as wildlife corridors, sustainable transport links and leisure and recreational routes.”*

Policy DP37 states that:

*“The District Council will support the protection and enhancement of trees, woodland and hedgerows, and encourage new planting. In particular, ancient woodland and aged or veteran trees will be protected.*

*Development that will damage or lead to the loss of trees, woodland or hedgerows that contribute, either individually or as part of a group, to the visual amenity value or character of an area, and/ or that have landscape, historic or wildlife importance, will not normally be permitted.*

*Proposals for new trees, woodland and hedgerows should be of suitable species, usually native, and where required for visual, noise or light screening purposes, trees, woodland and hedgerows should be of a size and species that will achieve this purpose.*

*Trees, woodland and hedgerows will be protected and enhanced by ensuring development:*

- *incorporates existing important trees, woodland and hedgerows into the design of new development and its landscape scheme; and*
- *prevents damage to root systems and takes account of expected future growth; and*

- *where possible, incorporates retained trees, woodland and hedgerows within public open space rather than private space to safeguard their long-term management; and*
- *has appropriate protection measures throughout the development process; and*
- *takes opportunities to plant new trees, woodland and hedgerows within the new development to enhance on-site green infrastructure and increase resilience to the effects of climate change; and*
- *does not sever ecological corridors created by these assets.*

*Proposals for works to trees will be considered taking into account:*

- *the contribution of the trees to the character and visual amenity of the local area; and*
- *the amenity and nature conservation value of the trees; and*
- *the extent and impact of the works; and*
- *any replanting proposals.*

*The felling of protected trees will only be permitted if there is no appropriate alternative. Where a protected tree or group of trees is felled, a replacement tree or group of trees, on a minimum of a 1:1 basis and of an appropriate size and type, will normally be required. The replanting should take place as close to the felled tree or trees as possible having regard to the proximity of adjacent properties. ...”*

#### East Grinstead Neighbourhood Plan (Made Plan, November 2016)

The Vision for East Grinstead as set out in the Made Neighbourhood Plan is defined as:

*“To provide for a positive future for East Grinstead that is socially inclusive for all, vibrant, economically robust and will allow residents to live with a high degree of self-sufficiency in a town with a first rate natural, built and historic environment”.*

The core objectives set out in the Neighbourhood Plan are to:

- *“Improve the town’s urban, rural and historic environment and protect it from harmful development;*
- *Make prudent use of natural resources by promoting development on previously developed sites within the built up area boundary;*
- *Improve highway and infrastructure conditions, reduce the reliance on car use and provide attractive alternative means of travel;*
- *Provide quality new homes for existing and future residents within existing environmental and infrastructure constraints;*
- *Promote development that will provide sustainable economic growth, including business and tourism related development and maintain a prosperous town centre; and*
- *Protect the countryside and urban open spaces for their landscape, wildlife, agricultural, recreational and natural resource value, specifically including Ashdown Forest and Areas of Outstanding Natural Beauty.*

Policy EG1 relates to the High Weald Area of Outstanding Natural Beauty, and states that:

*“The onus is on the applicant to demonstrate that the scheme would not negatively impact on the existing quality of the protected landscape and its setting taking account of locally important features. Proposals that have not fully considered and addressed the impact on the AONB will normally be refused.”*

Policy EG2 relates to Areas of Development Constraint, and Policy EG2a- Coalescence states that:

*“Planning permission will not normally be granted for development which:*

- 1) Results in the coalescence of East Grinstead with Crawley Down or Ashurst Wood;*
- 2) Results in the perception of openness being unacceptably eroded within this area; or*
- 3) Contributes towards the ad hoc or isolated development of dwellings outside the built up area, including infilling of built up frontages or linear development along roads.*

Policy EG3 relates to Promoting Good Design, and states that:

*“Planning permission will normally be granted where development proposals meet the following criteria:*

- a) The form of the proposed development is proportionate and in keeping with the scale, height, materials and site coverage of the surrounding area;*
- b) The layout of the proposed development respects the topography and character of the site, protects important landscape features and does not harm adjoining amenity;*
- c) The proposal does not result in the loss of buildings or spaces that would have an unacceptable impact on the character of the area; ...*
- e) The design of new buildings and the layout of spaces, including footways, car and cycle parking areas, should be permeable and provide connectivity with neighbouring areas; ...*
- h) Proposals make provision for green infrastructure and biodiversity enhancement. ...”*

Policy EG16 relates to Ashdown Forest Special Area of Conservation and Special Protection Area, and states that:

*“Within a 7km zone of influence around the Ashdown Forest SPA, all residential development leading to a net increase in dwellings will be required to:*

- contribute towards the enhancement and improvement of the Suitable Alternative Natural Greenspace (SANGs); and*
- contribute towards the Strategic Access Management and Monitoring (SAMM) Strategy.”*

Policy SS8 relates to the Land South of Birches Industrial Estate and West of Imberhorne Lane, in which the Site is located, states that:

*“Planning permission for modest development in the form of public open space, including SANGS (suitable alternative natural green space), which is subject to meeting the relevant criteria for their provision and to the approval of MSDC, playing fields, allotments, cemetery uses and ancillary support buildings such as small pavilions, kiosks or sheds will be supported where it can be demonstrated that the open character of the area will be retained.”*



## 1.8. LANDFORM

The desk study of the landform of the setting is recorded in Fig. 11, and the landform of the site is recorded in Fig. 12. At its broadest level landform forms the wider setting for the site – it creates, through natural processes, modified to a degree by the intervention of man, the form of the land of the site and the setting. It is also a major determinant in the significance of the visual qualities of the site in terms of prominence or concealment.

The Site is located on the side of a wide ridgeline that crosses the landscape in a broadly east west orientation, the ridgeline rises to sits on land which rises to high point south of the Site. The Site low point is along the northern edge, and a high point of approximately 130m AOD can be identified in the far southeast corner of the Site adjacent to Imberhorne Lane.

The wider landscape has also been influenced by the watercourses that cross the area which has resulted in a series of ridges and valleys. A predominant ridgeline runs from Crowborough, which is located to the southeast of the Site, across towards the southern extent of Crawley. This ridgeline broadly defines the northern extent of the High Weald AONB. At its highest point, on the western edge of Crowborough the height of the land sits at around 240m AOD, over 110 metres above the high point of the site.

To the north of the Site the landform slopes and undulates down to a low point of 50m AOD. A wide valley meanders through the landscape within which are located the settlements of Horley, Lingfield and Edenbridge. Further to the north beyond the valley the land rises to form a ridgeline which is between approximately 230m-245m AOD.

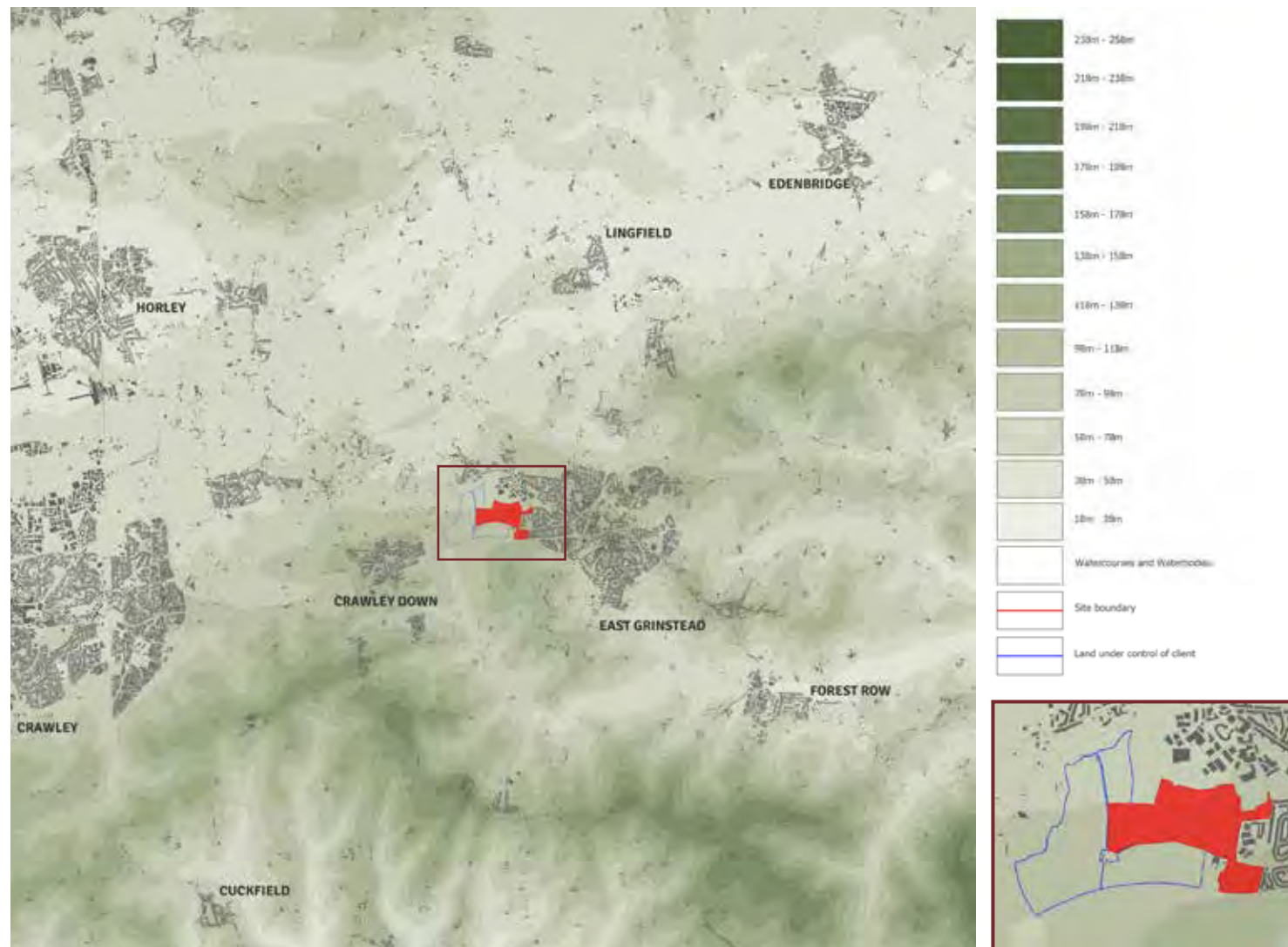


FIGURE 11. SETTING LANDFORM

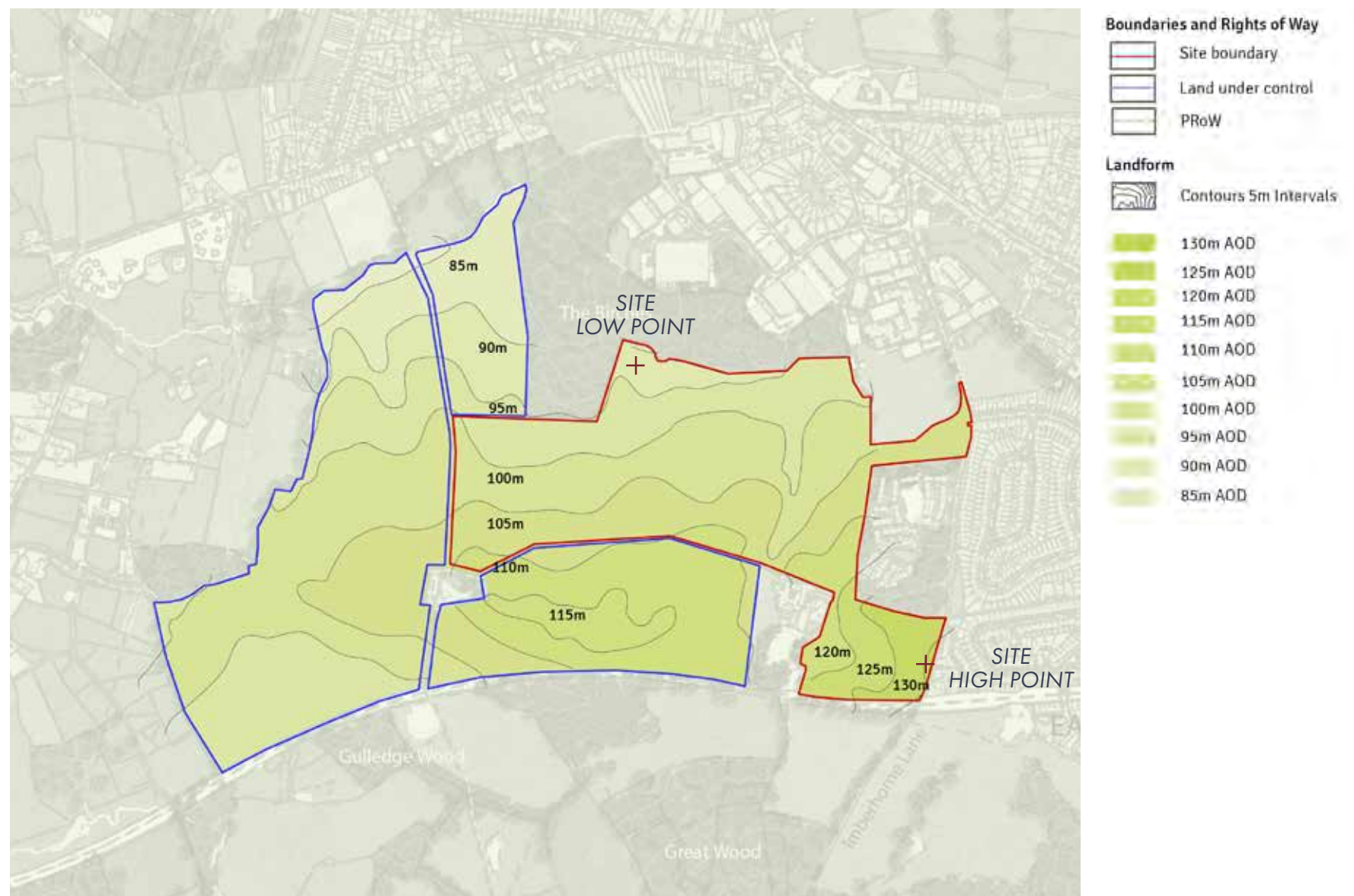


FIGURE 12. SITE LANDFORM



## 1.9. CHANGING LANDSCAPE

Cultural sensitivity rests, to no small degree, in the 'deep time' of man's activity on the land. The nature and content of the activity, and its products, is of course also central to the perception and definition of a 'sense of place'. Landscape and settlement character is shaped over time and an appreciation of the stages and activities that have happened in farming practices, in settlement and transport, as well as commerce, can all leave markers in the landscape that contribute to the 'local distinctiveness' (the phrase first invented by Common Ground in 1983) of a place. For a new development to have a successful relationship, and achieve a positive interaction with its human context as well as its landscape setting, a clear understanding of the history of the place can provide invaluable parameters and prompts.

The history of the land has relevance as many of the manmade elements in the settlement and the countryside can be better understood through some reference to the chronology of their mapped history. This LVA is not a Historic Landscape Character study but through simple evaluation of recorded elements on historic maps some measure of the changing patterns and uses of the site land can be usefully deduced.

Change in the landscape has been recorded on Ordnance Survey maps for over 100 years and these maps give snap-shots of the Site and its setting since the 1880's. They are reproduced in Figs. 13-16 with a series of landscape based observations. This LVA study leaves the detailed interpretation of the historic and cultural heritage significance to the Conservation Area Appraisal that considers the potential effects of the development proposal has been undertaken.



OS 125,000 EXPLORER MAP (2015) -  
COMPARISON MAP

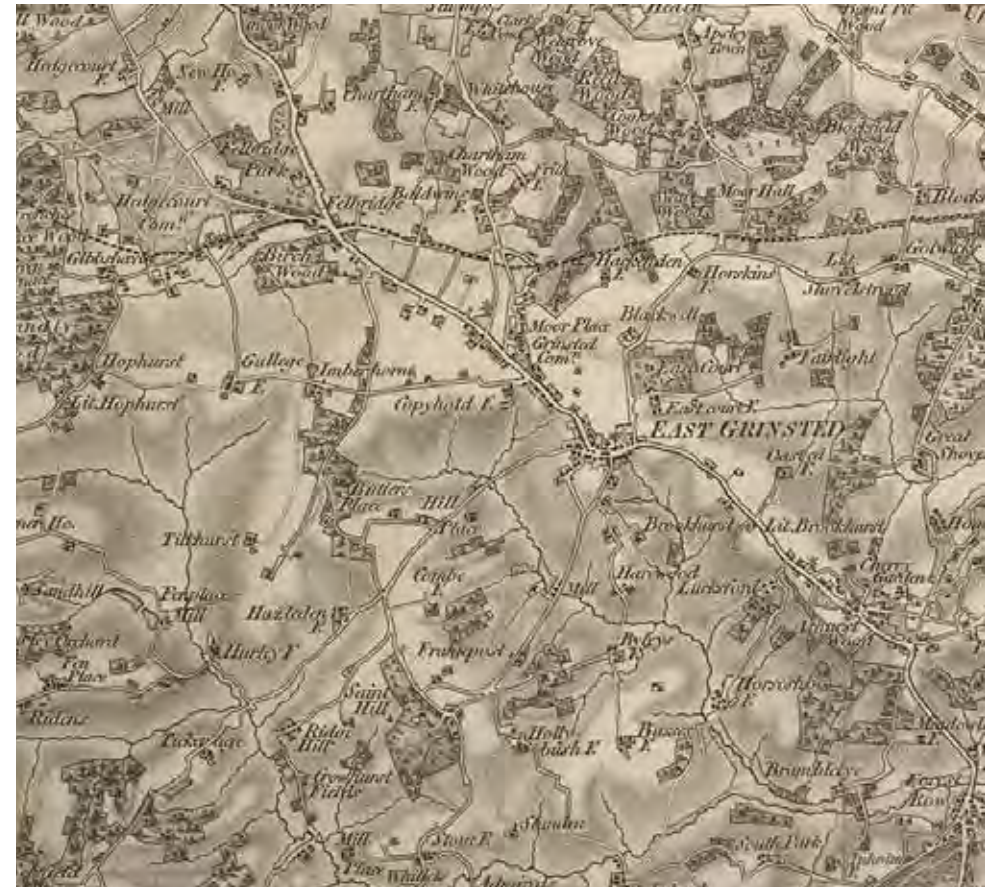


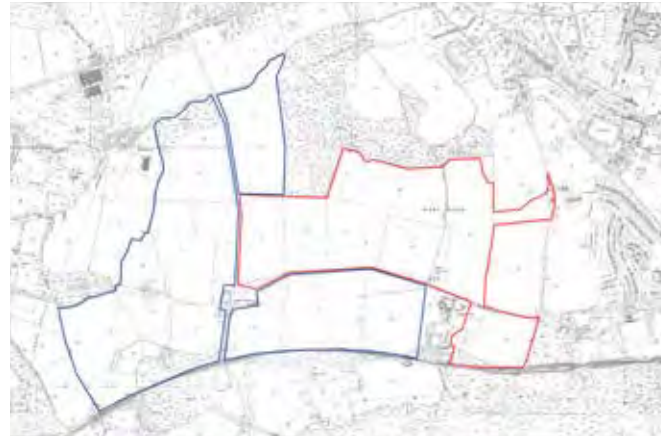
FIGURE 13. HISTORIC MAP 1856





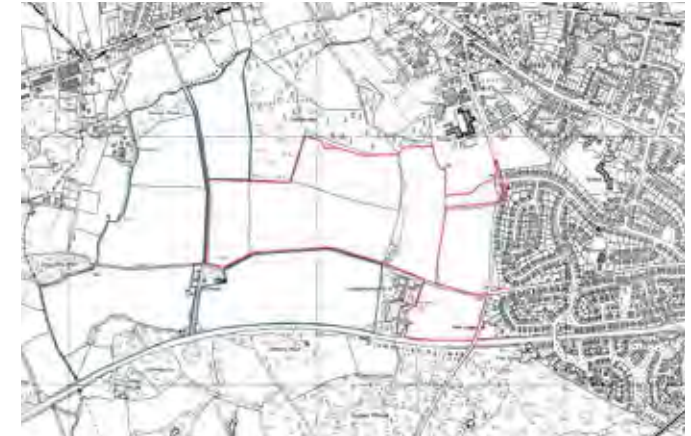
**FIGURE 14. HISTORIC MAP 1870**

- Substantial blocks and belts of woodland
- Field patterns are predominantly geometric, with fields varying in size
- Scattered Farmsteads with little other built form
- The London Brighton and South Coast Railway runs to the south of the Site.
- Areas of orchard around Gullede Farm and Imberhorne Farm
- Tree lined tracks lead from Gullede Farm in a northerly direction
- Predominance of trees within field boundaries
- Imberhorne Lane, Crawley Lane and Felbridge Road can be identified



**FIGURE 15. HISTORIC MAP 1950**

- Substantial blocks and belts of woodland plantations
- Field patterns are generally unchanged
- Areas of built form have started to cluster around existing farmsteads and along main routeways
- The London Brighton and South Coast Railway is shown as still in use
- Imberhorne Manor is shown Is the last mapping in which Imberhorne Manor is shown
- Field boundaries remain generally unchanged
- The settlement of East Grinstead has expanded



**FIGURE 16. HISTORIC MAP 1990**

- Field boundaries have been removed creating a larger field pattern
- Loss of orchard around Imberhorne Farm
- The settlements of East Grinstead and Crawley Down have expanded in size
- Dismantled railway line
- Imberhorne Manor no longer exists
- A school and various large scale industrial are situated on the western edge of East Grinstead









GULLEDGE FARMHOUSE: SOUTH EAST ELEVATION



## 1.10. ESTABLISHING THE VISUAL BASELINE OF THE SITE: BASELINE ZONE OF THEORETICAL VISIBILITY, VISUAL BARRIERS, BASELINE VISUAL ENVELOPE MAPPING

This is a computer generated 3D model of the landform of the site and setting. The maps within this LVA Appendix give a pictorial representation of how the shape and form of the ground may affect views across the landscape. It is an analytical process that is an aid to understanding the possible visual effects of a development proposal. It also has been used in this study to inform the early visual baseline study - as a guide to where work on the ground should be focused.

The Zone of Theoretical Visibility (ZTV) is a specialist programme and is defined within the Guidelines for Landscape and Visual Impact Assessment as an: "Area within which a proposed development may have an influence or effect on visual amenity". ZTVs can be used to define the Visual Envelope Map. These are predictive analytical 'tools' and are only as accurate as the input data. (The industry standard is the Key TERRA-FIRMA ZTV software and this has been used in this study). The principle of the application works by a series of 'rays' plotted to radiate from a target point, or multiple points from CAD polylines, in a manner that represents hundred of section lines drawn and calculated through the mapped topography of the setting. The ZTV illustrations in this LVA give a computer representation of zones or areas that may be visible from the defined locations within the site.

The ZTVs have been mapped on the 3D OS base and then for the Local maps have been placed on the aerial photograph. For the Wider ZTV maps the OS map is used. The hedgerows along the site boundaries have been modelled as Visual Barriers. The programme enables the placement of known obstructions: trees, buildings etc in the model. These have to be carefully modelled and are placed using topographic data from the site survey or other verifiable and declared sources. The baseline ZTVs show these Visual Barriers as annotated additions to the map (Fig. 17).

The illustrations of ZTVs for the Site take no account, other for the Visual Barriers annotated on the drawings, of any other obstacle: the houses, structures, trees and hedgerows, within the extent of the Map. The computer model is based on the 3D Ordinance Survey Digital Ground Model data. The illustrations are a landform based study. The extent to which landform may affect the visual amenity is represented within the limitations of the computer software is depicted. The rays record the interruption that results from intervening high ground. Where there are no rays the site cannot be seen from an eye level vantage point of 1.60m above ground. The landform will obscure the view (Figs. 18,19,20,21).

The predicted visual situation after development is shown on separate maps: the 'After Development' drawings. On these ZTVs the height of the buildings has been assumed as 10m above ground level at a known elevation., to give a general indication of visibility, at this early stage of analysis.

In this LVA deskwork involving a detailed ZTV modelling has been used to inform the study and guide the fieldwork. The 3D ground model has been produced and then known dimensions of the boundary tree lines and hedgelines have been introduced as Visual Barriers. Informed judgements about the likely Visual Receptors Groups that may experience a change in the visual baseline after the development is implemented have also been defined. Generally, this is straightforward and logical: leisure walkers along PRoVWs, motorists along the roads and residents at home. The intention is to record a representative and appropriate record of the visual baseline and the visual receptors and their various activities. An estimation of the likely visual receptor groups that may experience a change in their visual baseline after any future development has been set out in Section 2 of this LVA. This selection process is appropriately robust and provides sufficient information to enable informed judgements to be made and to enable an informed evaluation of the development proposal.



**FIGURE 17. ZONE OF THEORETICAL VISABILITY: VISUAL BARRIERS PLAN**

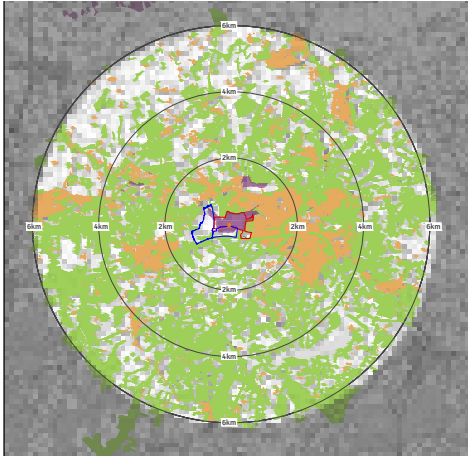
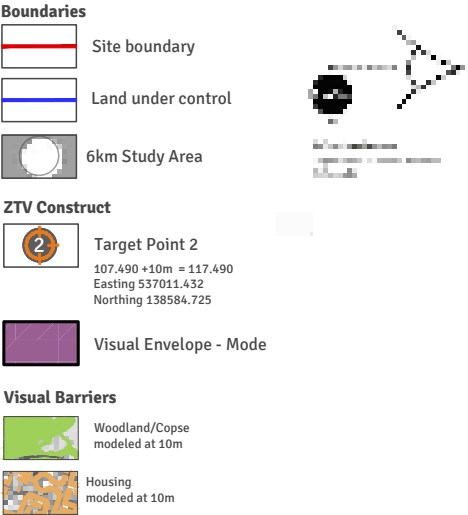


FIGURE 18. WIDER SETTING ZTV (6KM RADIUS FROM SITE):  
DEVELOPMENT PROPOSAL (WITH VISUAL BARRIERS)

FIGURE 19. WIDER SETTING ZTV (6KM RADIUS FROM SITE):  
BASELINE (WITH VISUAL BARRIERS)



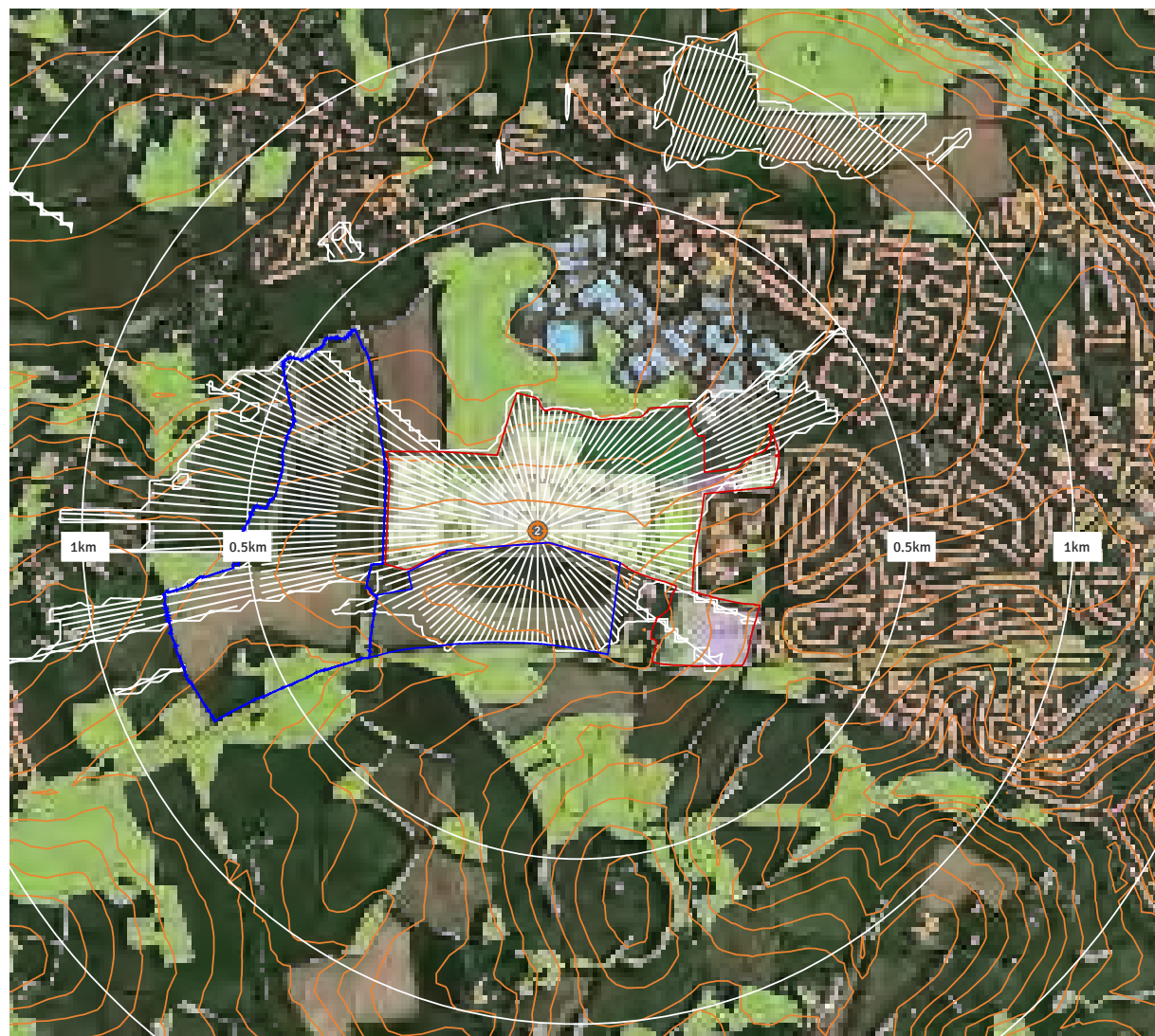


FIGURE 20. SITE SETTING ZTV (1.5KM RADIUS FROM SITE): DEVELOPMENT PROPOSAL

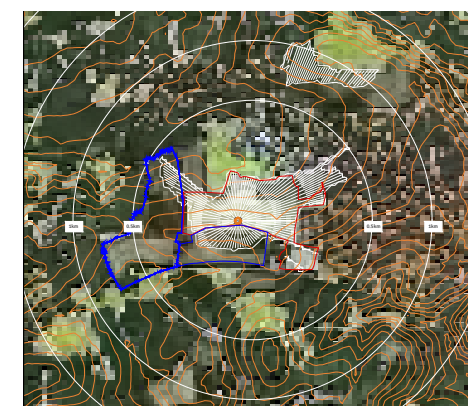
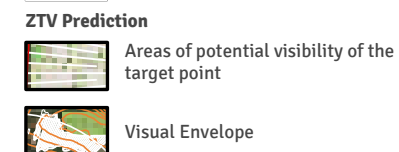
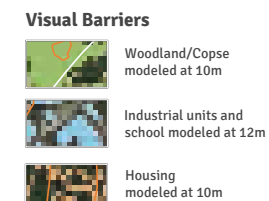
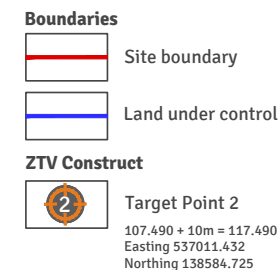


FIGURE 21. SITE SETTING ZTV (1.5KM RADIUS FROM SITE): BASELINE

1.11. LVA PHOTOGRAPHIC APPRAISAL: VIEWPOINTS AND VIEWS ON SITE AND NEAR SITE

LVA Photographic Record

Photographs 01 to 12, the locations of which are shown on Figs. 22 and 23, were taken with a Cannon EOS 6D with a standard fixed 50mm lens.

The photographs are eye level views with the camera held at approximately 1.60m above the ground.

Photomontages have been made with panoramic images taken at approximately 50% over-lap of the image. Photographs have been joined manually in Photoshop and cross checked against each process for accuracy.

Grid referenced are given for all of the photograph locations. These are not high resolution professional Visually Verified imagery ready photographs. They have been taken by Landscape Architects working on the LVA. They are selected to give a representational record of the Site and its setting.

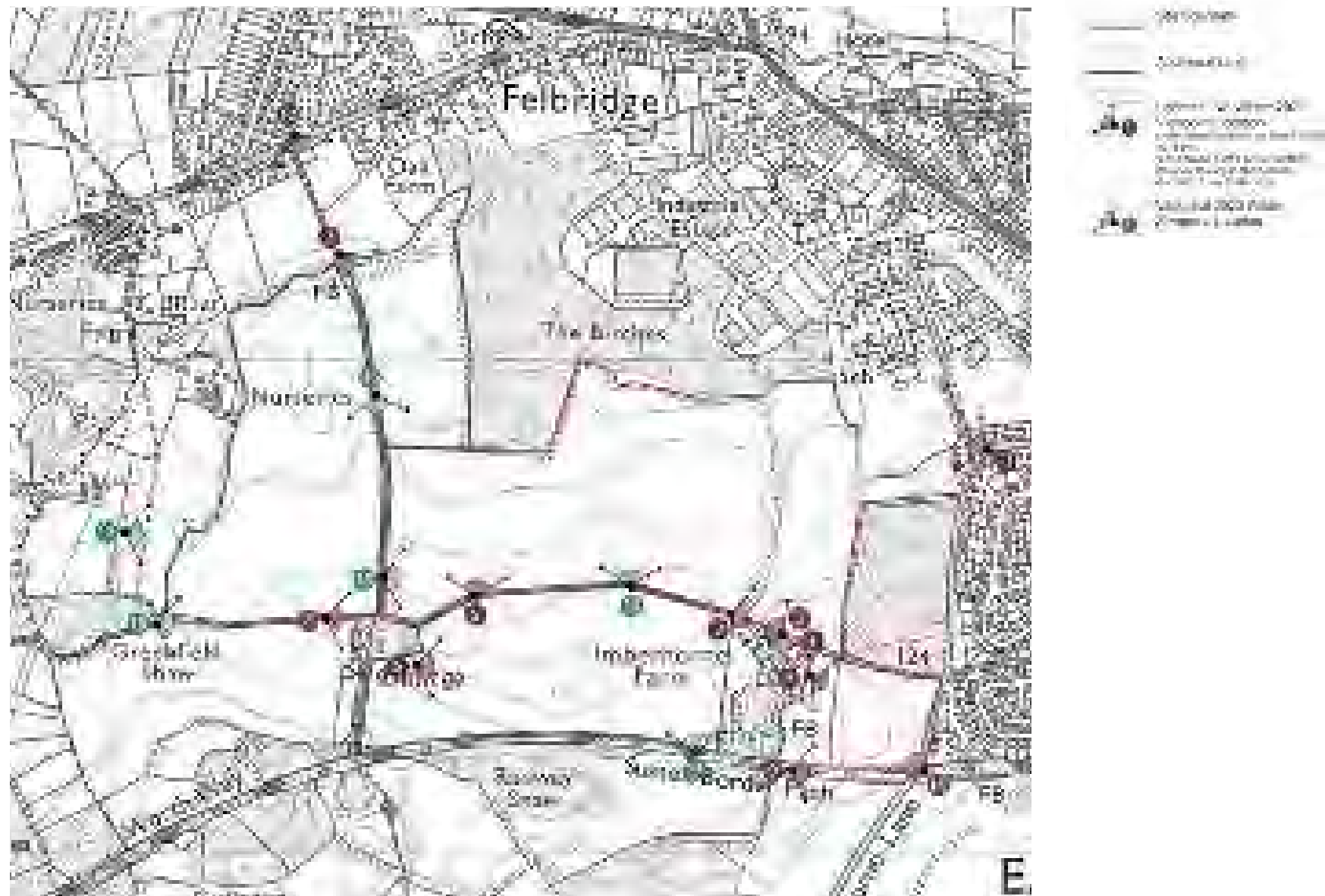
The fieldwork was undertaken to update the winter baseline photography of the selected representative viewpoints as identified within the 2016 LVA.

Further viewpoints were selected based on the fieldwork from the winter 2020 site visit apart.

Viewpoints	Symbol Used in Figures
Updated LVA Winter 2020 Viewpoint Locations	
Additional 2020 Winter Viewpoint Locations	



FIGURE 22. PHOTO LOCATION PLAN



**FIGURE 23. PHOTO LOCATION PLAN (OS BASE)**





**Viewpoint 1:** On PRoW (East Grinstead 44bEG-1) looking north-east

Site Visible: Yes

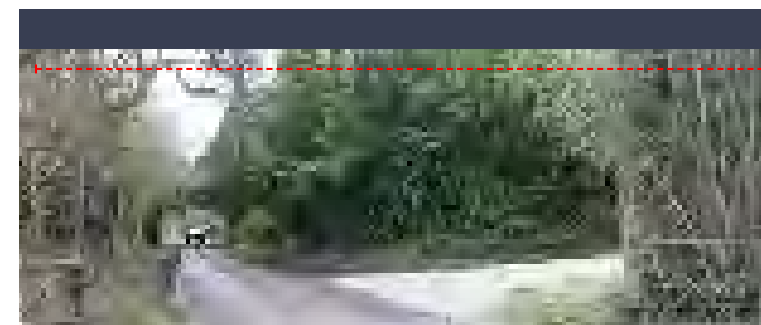
View Direction: North-east

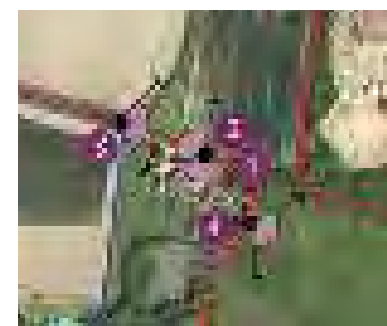
Date: 03/03/2020

Grid Reference: TQ 537368 138445

Elevation: 109m AOD

Distance to Site at nearest point: 1 m







**Viewpoint 2:** On PRoW (East Grinstead 44bEG-1) looking north-west

Site Visible: No

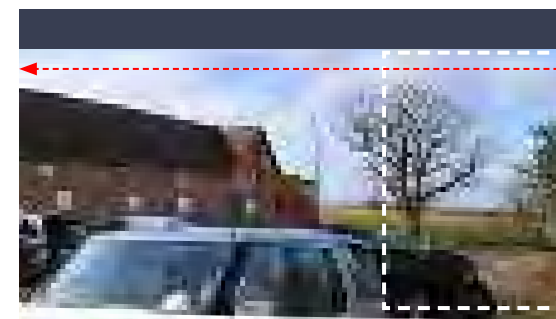
View Direction: North-west

Date: 03/03/2020

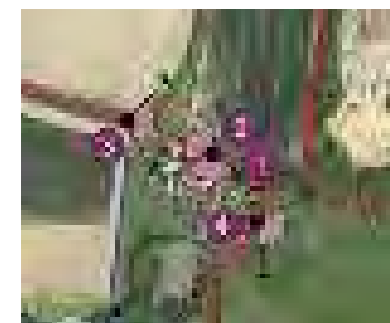
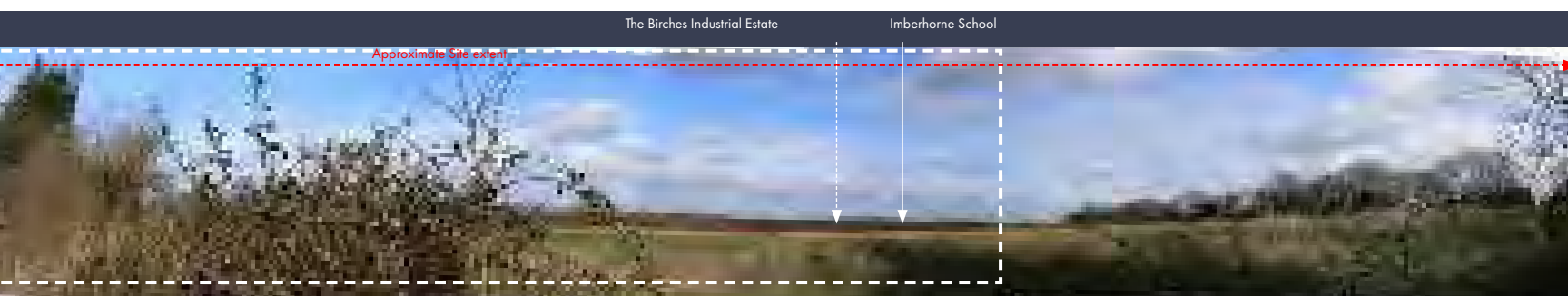
Grid Reference: TQ 537368 138445

Elevation: 109m AOD

Distance to Site at nearest point: 1 m









**Viewpoint 3:** Near PRow (East Grinstead 44bEG-1) looking north-east towards Imberhorne School

Site Visible: Yes

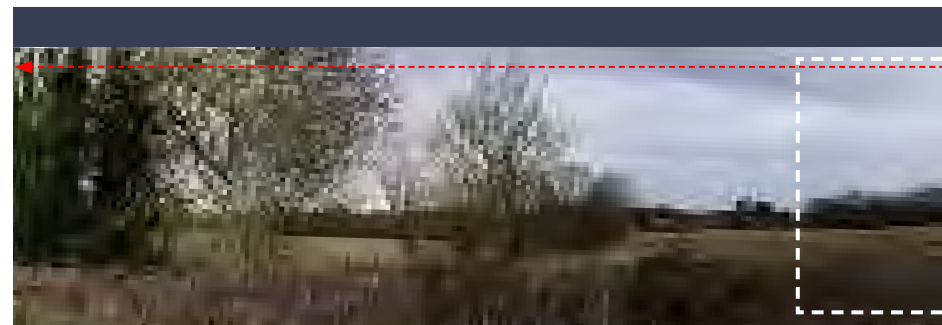
View Direction: North-east

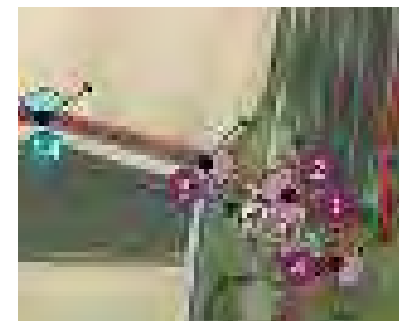
Date: 03/03/2020

Grid Reference: TQ 537285 138470

Elevation: 108m AOD

Distance to Site at nearest point: Adjoining









**Viewpoint 4:** Near Imberhorne Farm looking east towards Imberhorne Lane

Site Visible: No

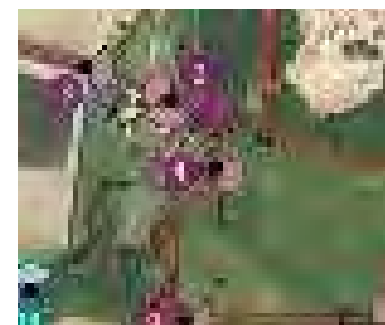
View Direction: East

Date: 03/03/2020

Grid Reference: TQ 32746 10637

Elevation: 115m AOD

Distance to Site at nearest point: On Site





**Viewpoint 5:** On PRoW (East Grinstead 44bEG-1) looking north towards The Birches and Oak Farm

Site Visible: Yes

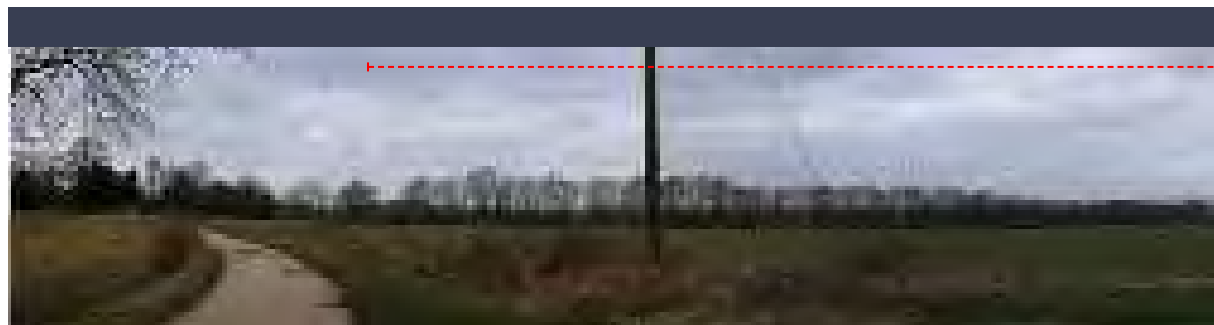
View Direction: North

Date: 03/03/2020

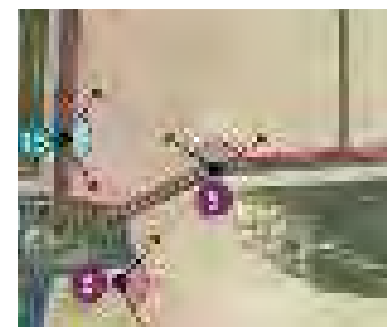
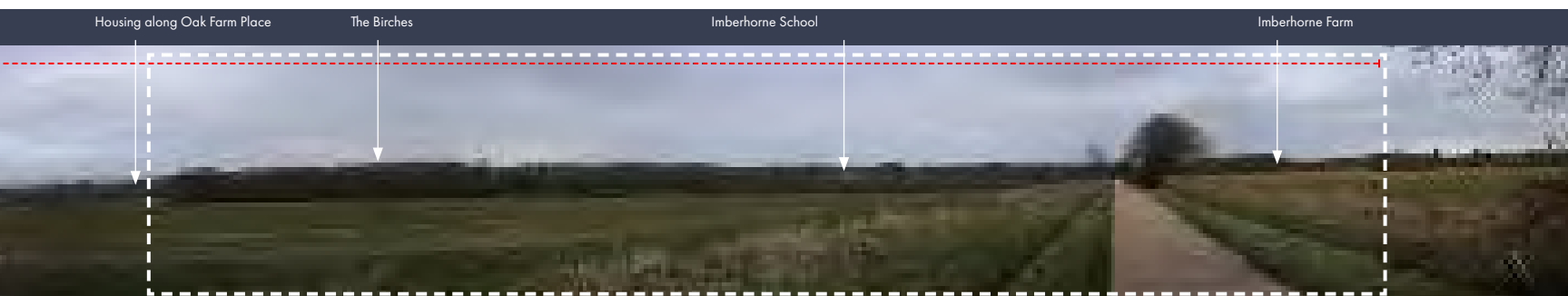
Grid Reference: TQ 536753 138525

Elevation: 109m AOD

Distance to Site at nearest point: Adjoining









**Viewpoint 6:** Off site - Looking east towards the site

Site Visible: yes

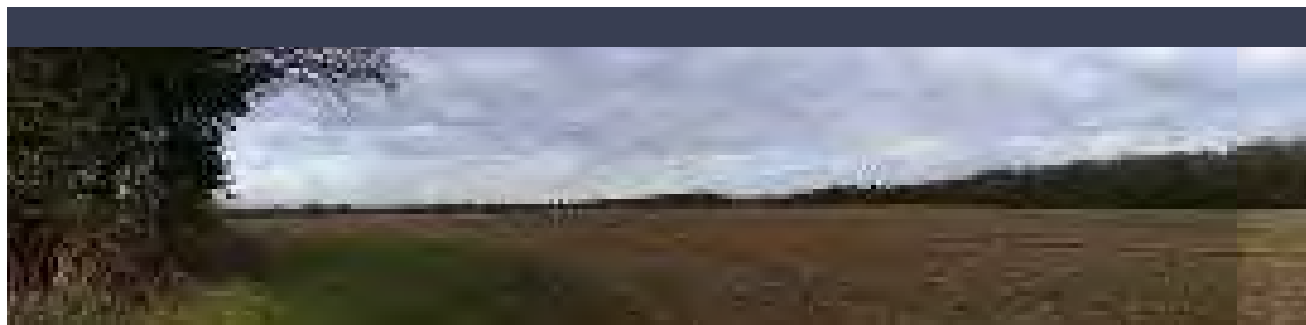
View Direction: East

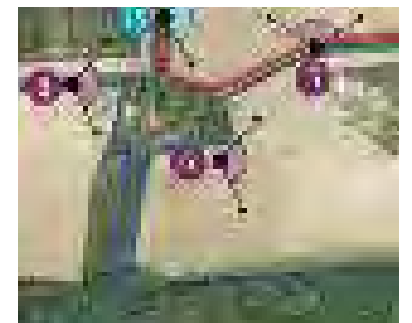
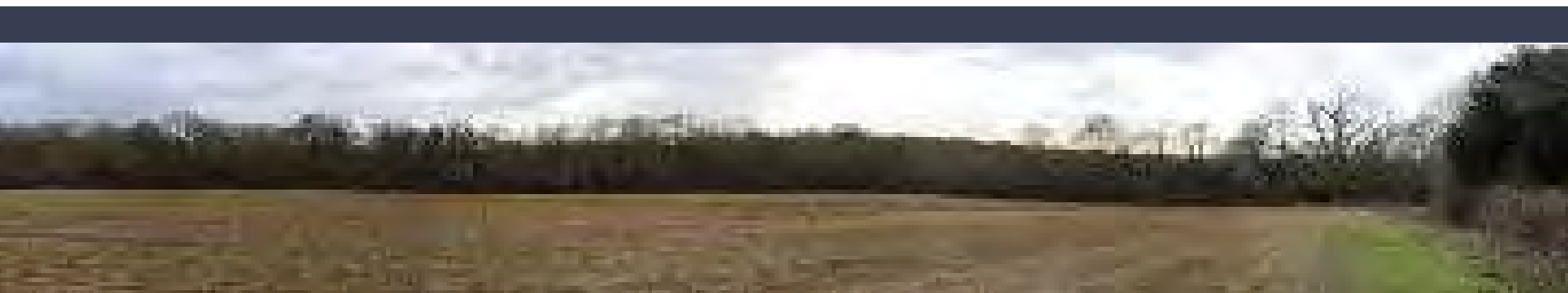
Date: 03/03/2020

Grid Reference: TQ 536627 138398

Elevation: 113m AOD

Distance to Site at nearest point: 75m









**Viewpoint 7:** Off site - On Bridleway (East Grinstead 40aEG-1) looking south-east towards the site

Site Visible: No

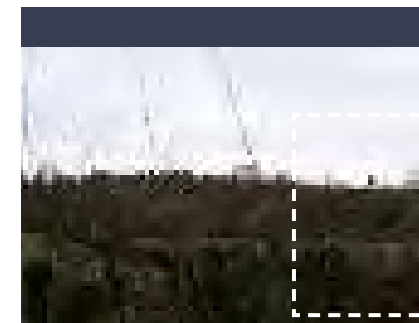
View Direction: South-east

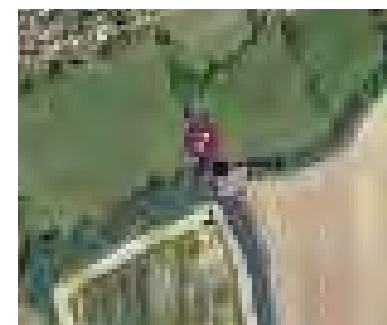
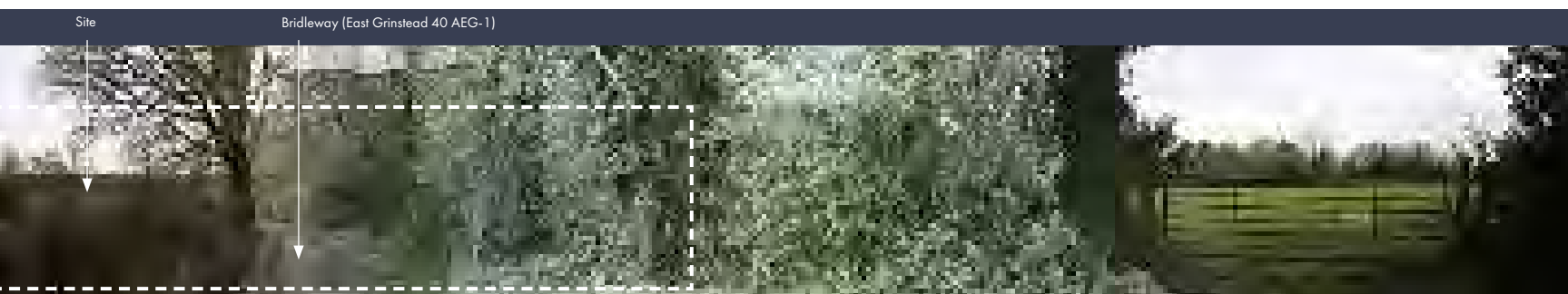
Date: 03/03/2020

Grid Reference: TQ 536430 139290

Elevation: 88m AOD

Distance to Site at nearest point: 400m







**Viewpoint 8:** On PRow (East Grinstead 44bEG-1) looking east towards to Gulledge

Site Visible: Yes

View Direction: East

Date: 03/03/2020

Grid Reference: TQ 536409 138479

Elevation: 109m AOD

Distance to Site at nearest point: 165m









### Viewpoint 9: Worth Way/Sussex border path (Cycle Way)

Site Visible: Yes

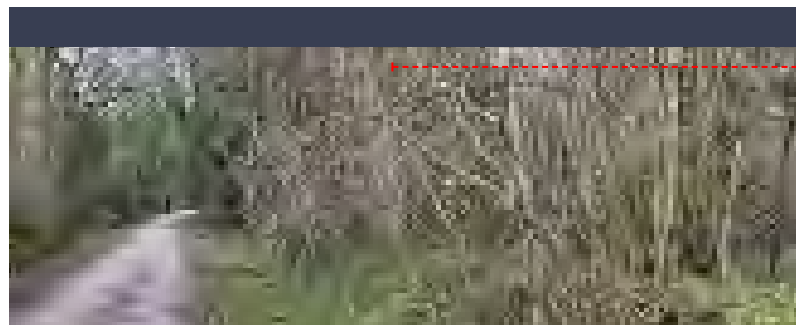
View Direction: North-east

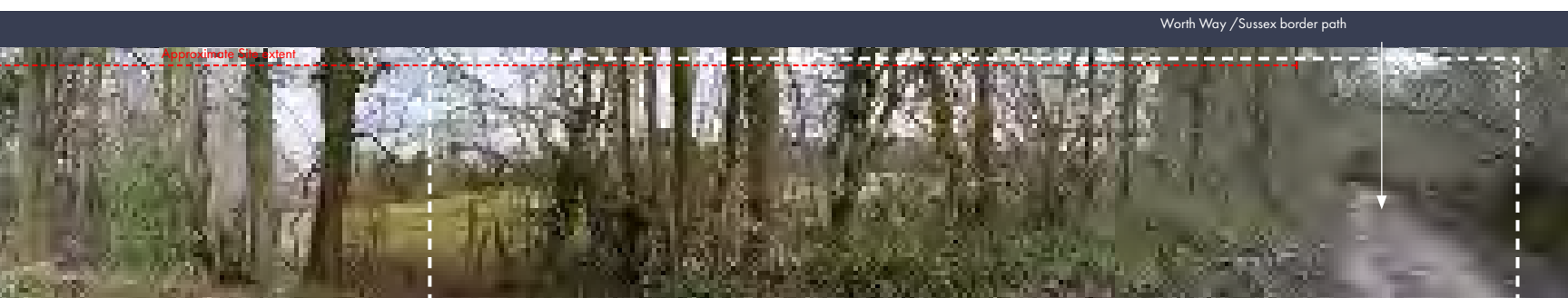
Date: 03/03/2020

Grid Reference: TQ 537385 138179

Elevation: 117m AOD

Distance to Site at nearest point: Adjoining









**Viewpoint 10: Imberhorne Lane, looking north near Otterbourne Place**

Site Visible: Yes

View Direction: North

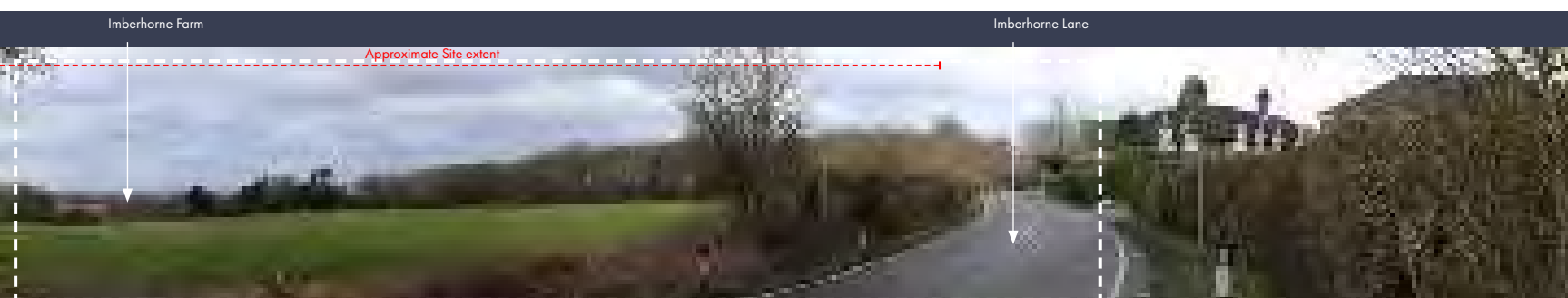
Date: 03/03/2020

Grid Reference: TQ 537637 138183

Elevation: 126m AOD

Distance to Site at nearest point: 10m







**Viewpoint 11: Heathcote/Imberhorne Lane junction, looking west**

Site Visible: Yes

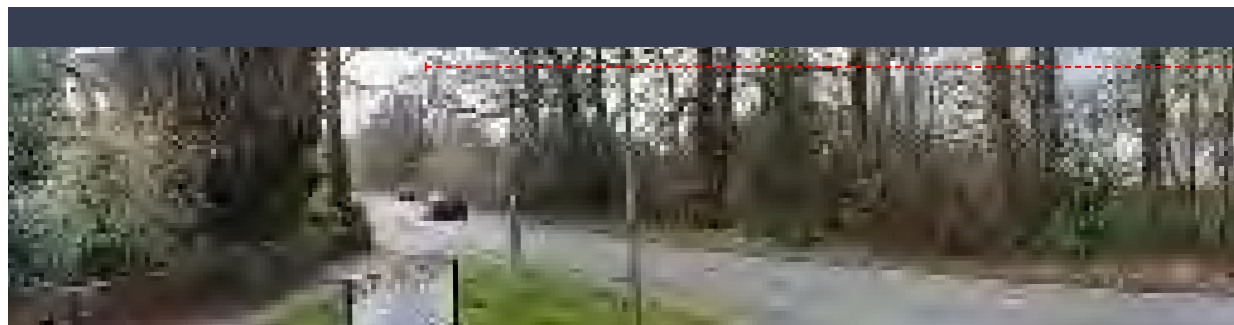
View Direction: West

Date: 03/03/2020

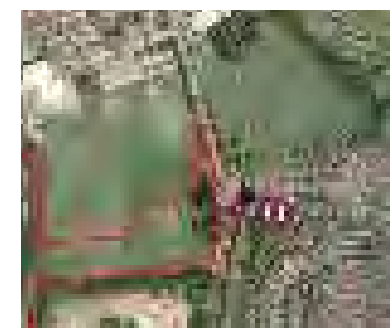
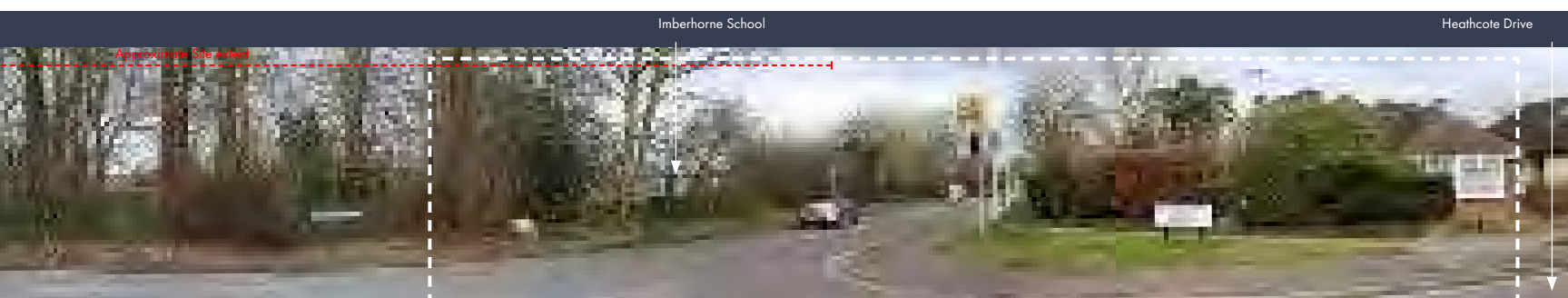
Grid Reference: TQ 537697 138355

Elevation: 105m AOD

Distance to Site at nearest point: 241m









**Viewpoint 12:** On Crawley Down Road, looking south

Site Visible: No

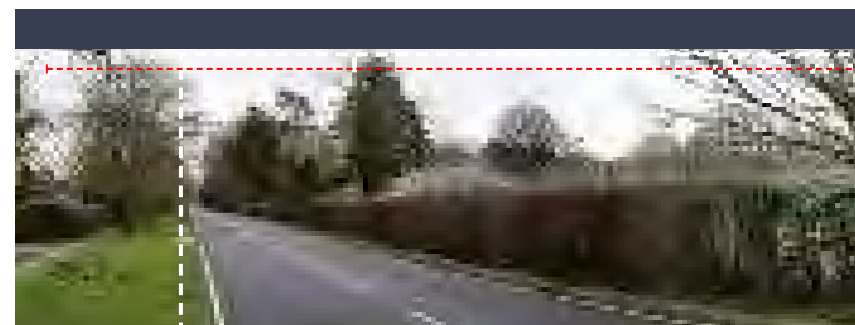
View Direction: South

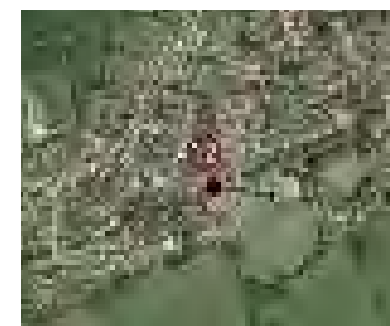
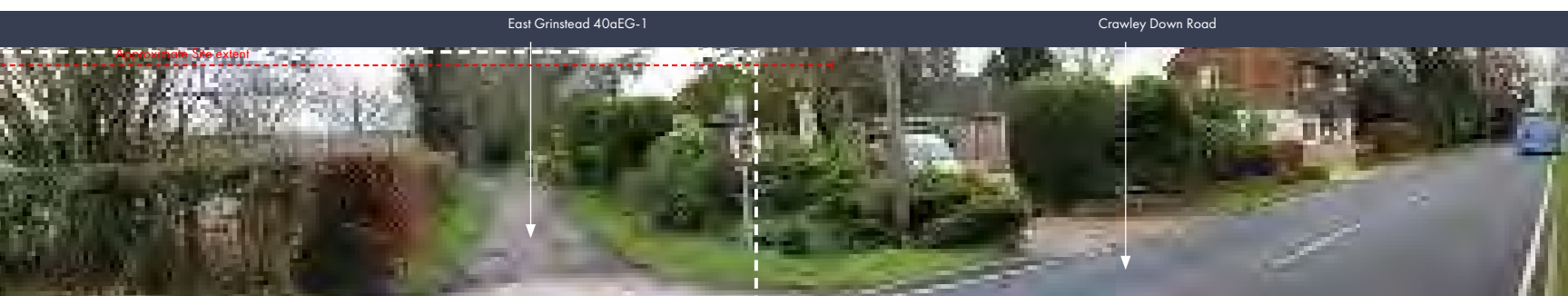
Date: 03/03/2020

Grid Reference: TQ 536372 139438

Elevation: 88m AOD

Distance to Site at nearest point: 680m









**Viewpoint 13:** Off site – view from long distance trail Sussex Border Path/Worth Way looking northwards towards the Site

Site Visible: No

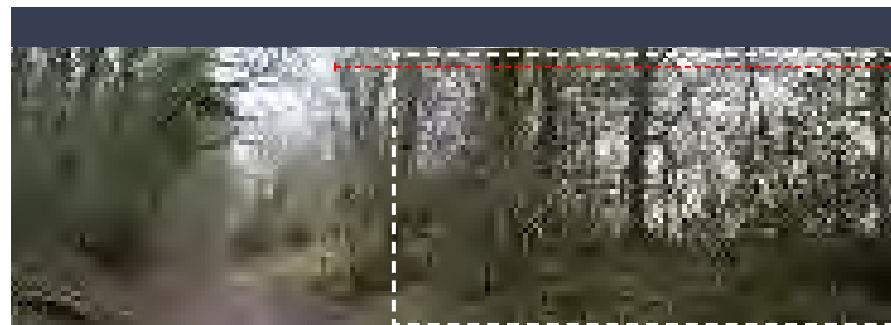
View Direction: North

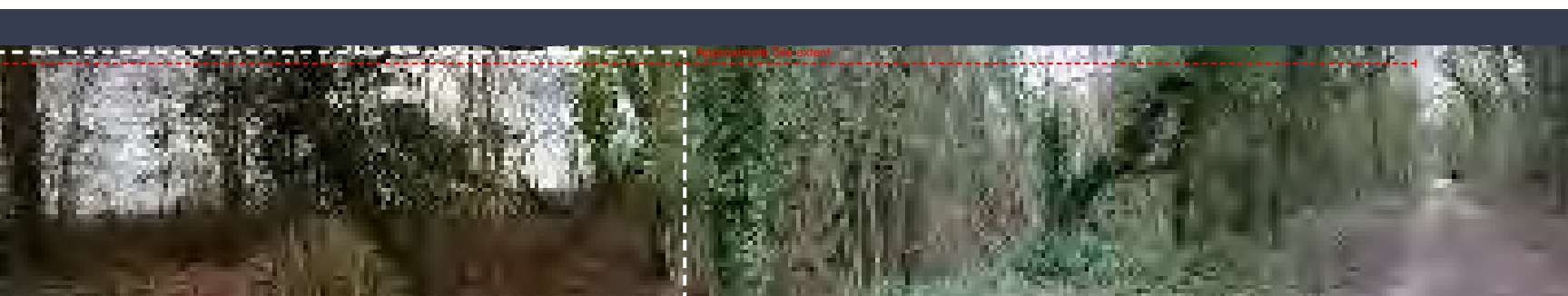
Date: 03/03/2020

Grid Reference: TQ 537190 138211

Elevation: 116m AOD

Distance to Site at nearest point: 165m







**Viewpoint 14:** Off site – view from PRoW 44bEG looking northwards across the Site

Site Visible: Yes

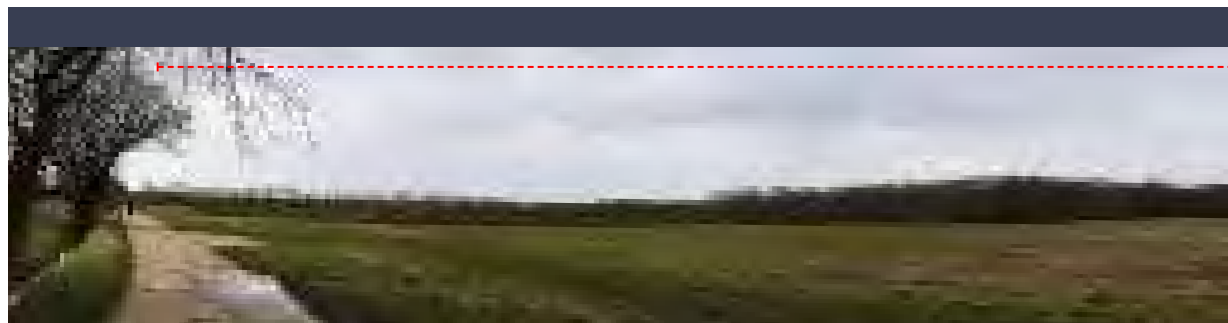
View Direction: North

Date: 03/03/2020

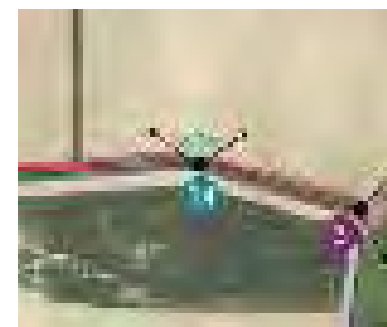
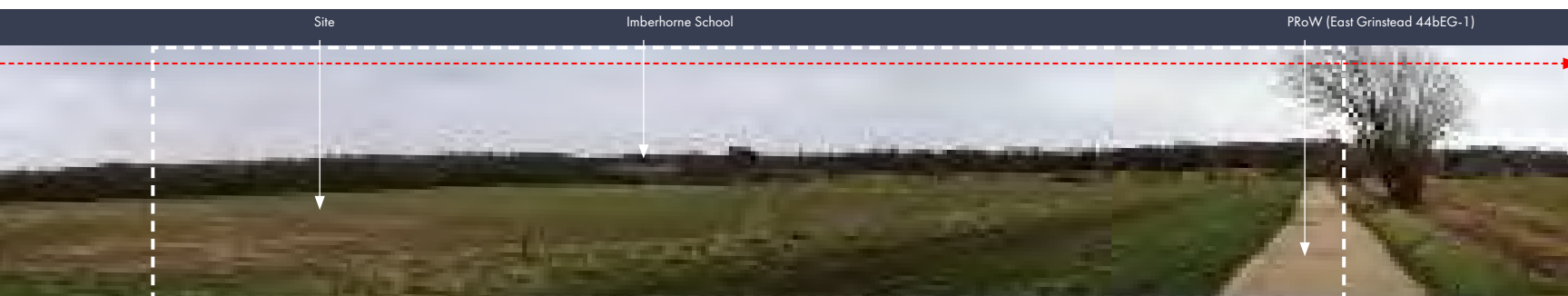
Grid Reference: TQ 32746 10637

Elevation: 109m AOD

Distance to Site at nearest point: Adjoining









**Viewpoint 15:** Off site – view from PRoW 40aEG looking eastwards across the Site

Site Visible: Yes

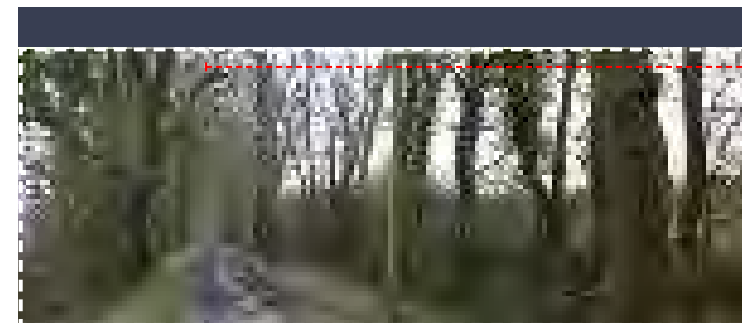
View Direction: East

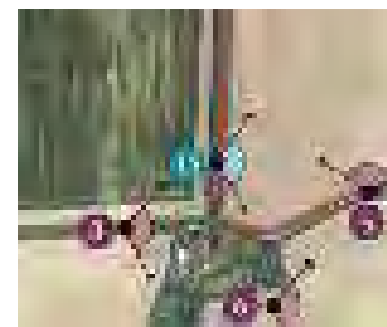
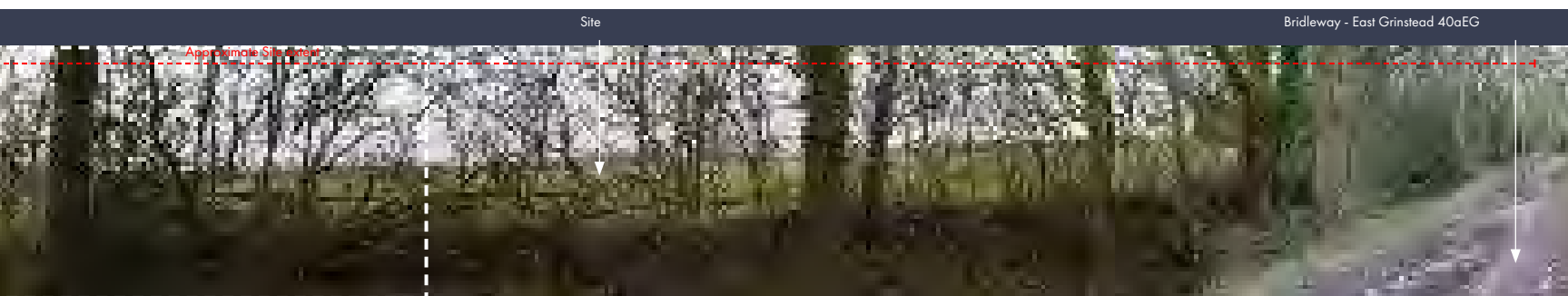
Date: 03/03/2020

Grid Reference: TQ 536556 138585

Elevation: 107m AOD

Distance to Site at nearest point: 5m









**Viewpoint 16:** Off site – view from PRoW 40aEG looking south-east towards the Site

Site Visible: Yes

View Direction: South-east

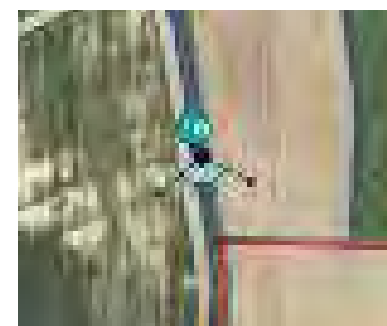
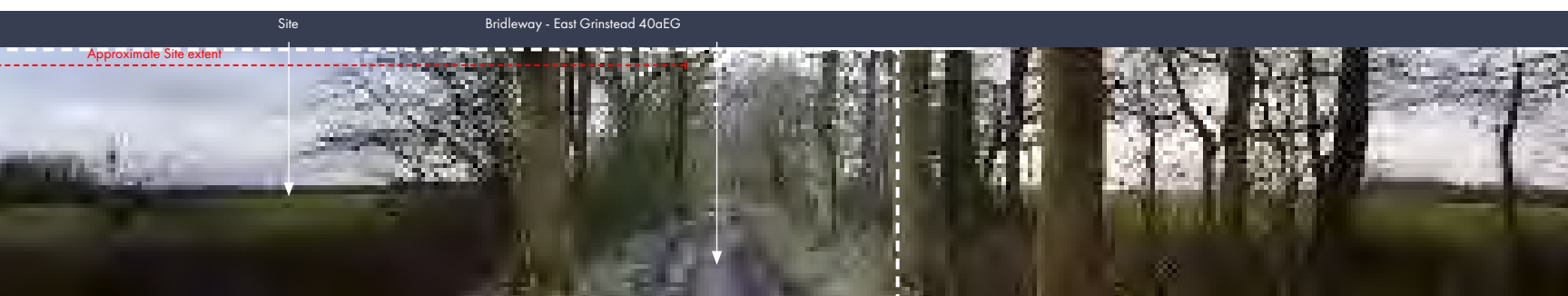
Date: 03/03/2020

Grid Reference: TQ 536541 138899

Elevation: 96m AOD

Distance to Site at nearest point: 110m







**Viewpoint 17:** Off site – view from PRow 45EG looking eastwards towards the Site

Site Visible: No

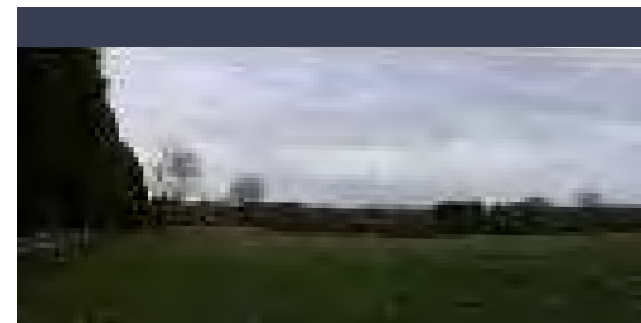
View Direction: East

Date: 03/03/2020

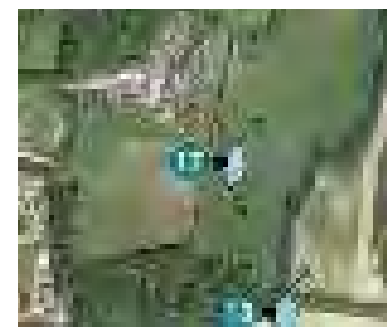
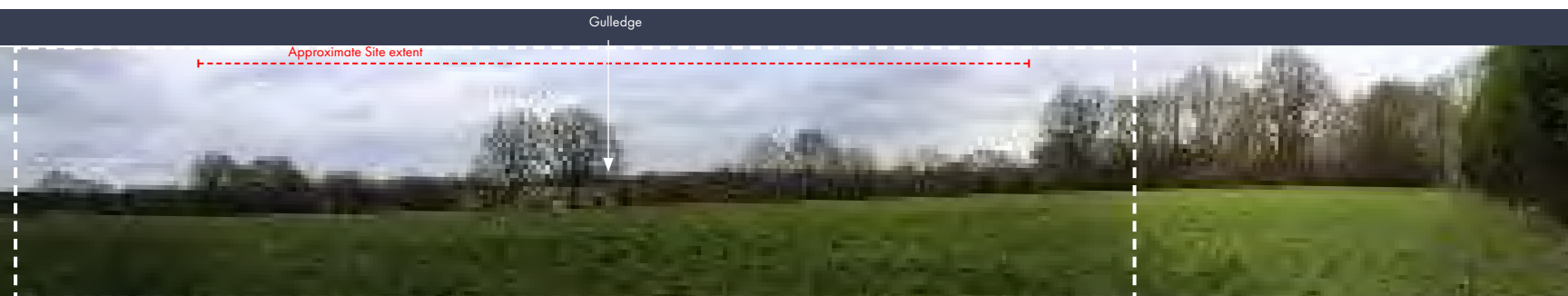
Grid Reference: TQ 536019 138622

Elevation: 102m AOD

Distance to Site at nearest point: 550m









**Viewpoint 18:** Off site – view from the junction of PRoW 45EG and 44dEG and looking eastwards towards the Site

Site Visible: No

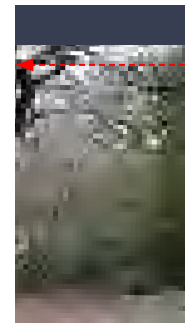
View Direction: East

Date: 03/03/2020

Grid Reference: TQ 536106 138466

Elevation: 102m AOD

Distance to Site at nearest point: 455m







## 1.12 LVA BASELINE SUMMARY: LANDSCAPE RECEPTORS

The Site's key landscape resources and attributes have include the following assets. They are also the Setting and Site Landscape Receptors that have been identified at this updated stage of LVA work:

### **Landscape Attributes: Setting Landscape Receptors:**

- The rolling and wooded countryside at the northern edge of the
- High Weald National Character Area;
- The wooded and secluded valley along Felbridge Water;
- The rolling and wooded countryside at the northern edge of the High Weald National Character Area;
- The extensive tree cover within 2km of the Site;
- The tree lined Worth Way;
- The tree lined PRoW that link the Site to the immediate setting;
- The settlement edge location; and the
- The heritage assets at Imberhorne Farm and Gulledege.

### **Landscape Site: Site Landscape Receptors:**

- The landform of the Site land;
- The plants and animals and their habitats that the Site land supports;
- The Site boundary elements: the extensive tree cover and hedgerows;
- The tree lined PRoW's that cross the Site;
- The tree lined Drive to Imberhorne Farm; and the
- The historic and cultural actions, marks and memories associated with the human activates on the Site.

## 1.13 LVA BASELINE SUMMARY: VISUAL RECEPTORS

The Site's principle visual resources and attributes have been identified and described within this updated LVA. At this stage in the promotion of the Site and the development proposal the visual baseline has been defined to include the following assets and also the Visual Receptors Groups that may experience views to the Site at specific viewpoints:

### **Visual Receptors in the public domain will include:**

- Visual Receptor Group: Walkers and riders on the PRoW across the Site  
  
Activity: leisure based  
Likely visual expectations: general countryside components
- Visual Receptor Group: Walkers and riders on the Worth Way, Sussex Border Path cycleway near the Site  
  
Activity: leisure and possibly commuter based  
Likely visual expectations: occasionally open, generally filtered or obscured views from cuttings of general countryside components and Gulledege house;
- Visual Receptor Group: Walkers, riders and motorists and users of public transport along Imberhorne Lane near the Site:  
  
Activity: journey based  
Likely visual expectations: passing open views of general countryside components
- Visual Receptor Group: Walkers, riders and motorists and users of public transport along Crawley Down Road near the Site:  
  
Activity: journey based  
Likely visual expectations: glimpsed and filtered passing views of general countryside components

### **Visual Receptors in the private domain will include:**

- Visual Receptor Group: Walkers, Pupils, staff and visitors to Imberhorne School near the Site:  
  
Activity: in-door and outdoor school based activates  
Likely visual expectations: a range of open, glimpsed and filtered views of general countryside components
- Visual Receptor Group: residents in private properties along Imberhorne Lane near the Site:  
  
Activity: in-door and garden-based viewpoints  
Likely visual expectations: a range of open, glimpsed and filtered views of general countryside components
- Visual Receptor Group: residents in private properties at the western end of Heathcote Drive near the Site:  
  
Activity: in-door and garden-based viewpoints  
Likely visual expectations: a range of open, glimpsed and filtered views of general countryside components
- Visual Receptor Group: residents in private properties within the Kingscote Way development near the Site:  
  
Activity: in-door and garden-based viewpoints  
Likely visual expectations: a range of glimpsed and filtered views of general countryside components.



ON SITE LOOKING TOWARDS IMBERHORNE FARM AND IMBERHORNE FARM COTTAGES







## 2. LANDSCAPE AND VISUAL ANALYSIS

## 2.1 LANDSCAPE CAPACITY OF THE SITE

Mid Sussex District Council commissioned and then published in July 2007 the 'Mid Sussex Landscape Capacity Study' (Hankinson Duckett Associates [HAD]). In March 2014 the Council appointed LUC to undertake another study that further examined the development growth capacity that could be accommodated in the Mid Sussex District. The 2014 study considered four topic areas: environment; infrastructure; landscape capacity; and sustainability (Fig. 24). The LUC study makes the following reference to the HDA report:

"The 2007 Study was undertaken to inform the Core Strategy that was being produced at the time, and considered the capacity of the landscape to accommodate strategic development under three broad options: concentrating development around the three towns (East Grinstead, Haywards Heath and Burgess Hill); a more dispersed pattern spreading development across the District including sites adjacent to the larger and smaller villages; and the possibility of a new settlement. The 2007 Study divided the study area into nine main zones based on a landscape structure analysis, which identified the main elements that contribute to the structure, character and setting of the settlements."

The 2007 study in appraising character driving elements, described common qualities that were grouped by HAD into 75 landscape character areas. The process of defining and assessing the physical, visual and environmental components of the landscape, that leads to the identification of constraints and opportunities for development as part of a sequential search, is an approach encouraged by Government. The Mid Sussex Landscape Capacity Study of 2007 does not have a particular development proposal to consider however; it is to some degree a comparative exercise that gives weighed scores to the landscape of the district. Its terms of reference are based on the analysis of the character defining attributes in the landscape of the study area as a baseline to enable the judging of potential effects of a non-defined development proposal. It cannot and does not give consideration how a scheme could best fit into the landscape of a site. The HAD study in Section 5:

Landscape Capacity Appraisal, states:

"The baseline information collated as part of the desk top study and site survey work, together with the structural analysis and landscape characterisation have all been fed into the landscape sensitivity and landscape value assessments. Each landscape character area has been evaluated using the following matrices derived from the techniques and criteria identified in Topic Paper 6 of the Countryside Agency's landscape Character Assessment Guidance."

This LVA however has a focus on a specific change of use, with particular consideration of how the attributes of the Site should influence a consideration of a development proposal. The appraisal of the capacity of the Site at this refined, field scale level of study, includes the analysis of the baseline attributes in a process that looks to guide and shape the form, placement and content of the development proposal with the object of the avoidance of significant harm and to achieve a sensitive and successful fit in the landscape.

The 2007 HAD work placed the Site within LCA 08: Felbridge High Weald, and assessed a very large area that include the Site and extensive land to the west of Gullege Bridle Path as having a moderate Landscape Sensitivity and a slight Landscape Value (Fig. 26). These values when combined in the assessment matrix give a medium/high Landscape Capacity. In the study at 5.2.2 the 'Medium/High' rating that covers the Site is explained:

"Medium/High' capacity identifies a landscape character area that has a generally lower sensitivity that would accommodate significant allocations of development but which has specific considerations such as a sensitive adjacent character area, separation between settlements or setting to settlements".

This is the second highest scoring for capacity that HAD made in 2007 and is clearly helpful to the consideration of the merits that the Site has as a growth point for East Grinstead.

The LUC study in 2014 reappraised this rating with a different smaller scale, with different parameters. The 2014 study grades the Site, and as before a significant area of land to the west as: Medium capacity. Comparison between the two capacity studies is therefore not straightforward. This LVA is based within the context of these capacity predictions, but the work in the LVA is not part of a comparative test nor is it seeking to grade against a scale for all areas in the district. The reduction or avoidance of harmful effects causing particular negative impacts on sensitive and valued receptors can be made through the process that uses the LVA as a tool to guide a development proposal to avoid harm. This is the process that has been undertaken at early stages in the promotion of the Site and now recorded, in this LVA.

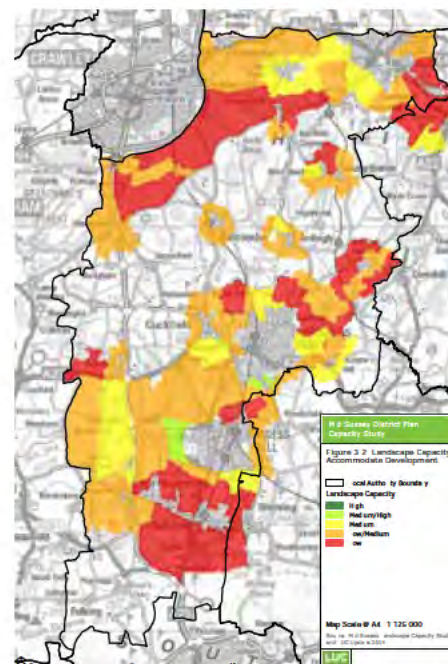


FIGURE 24. MID SUSSEX DISTRICT PLAN CAPACITY STUDY



FIGURE 25. CAPACITY OF MID SUSSEX DISTRICT TO ACCOMMODATE DEVELOPMENT: MID SUSSEX DISTRICT COUNCIL: 2014



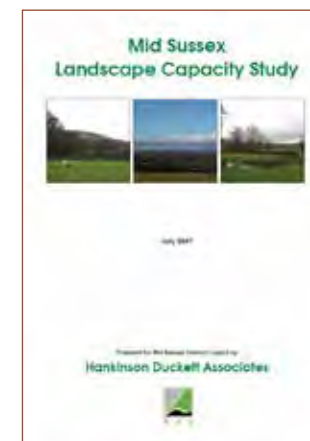
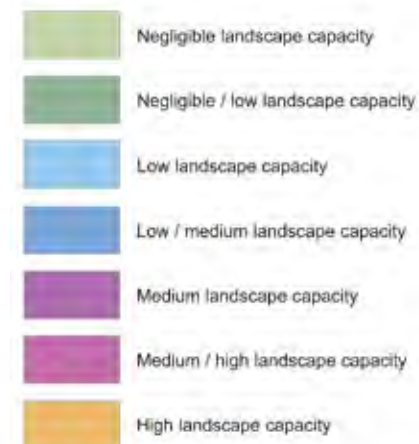
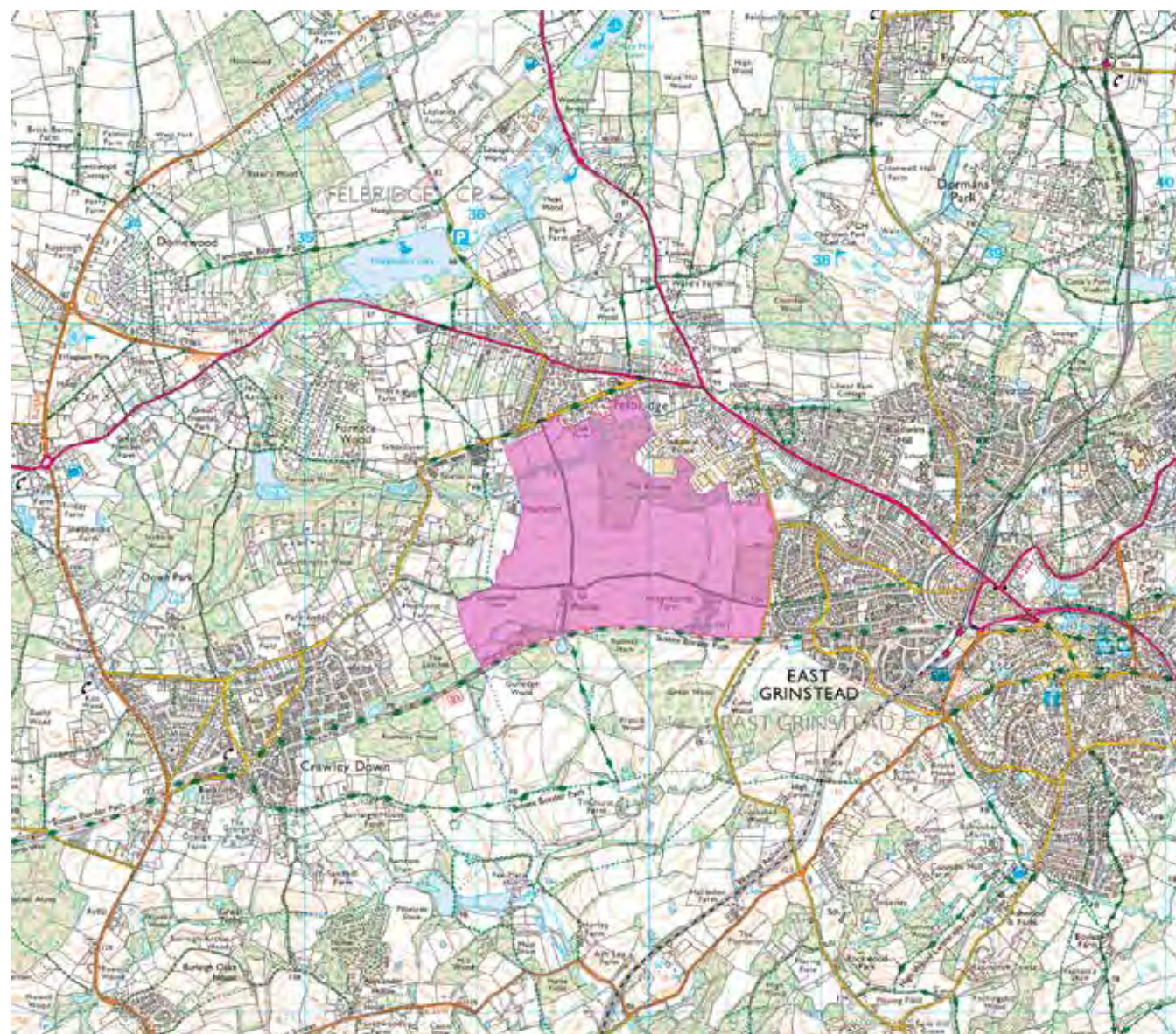


FIGURE 27. THE MID SUSSEX LANDSCAPE CAPACITY STUDY: HANKINSON DUCKETT ASSOCIATES 2007

FIGURE 26. LANDSCAPE CAPACITY MAP



## 2.2 THE CONSTRAINTS AND OPPORTUNITIES OF THE SITE

The work recorded in this initial LVA has been undertaken to explore the landscape and visual matters associated with the consideration of the residential-led development of the Site and in so doing to further inform the refinement of a development concept for the Site.

The recording, description and analysis of the landscape and visual baseline, through desk and field based work, has identified key constraints and opportunities in the landscape of the Site. The Landscape and Visual Constraints and Opportunities Plan (Fig. 23), gives a map of this analysis. In part constraints to development have to be informed by a knowledge of a possible development proposal, and in part by an appreciation of the baseline components in the landscape. The process contributes to an approach that ensures that the proposal is informed by the landscape and responds directly to the character of the Site and the setting: the aim is to make a proposal that belongs to the setting and makes a successful fit in the landscape.

The early concepts for the Site have been informed by the landscape and visual analysis work recorded in this study. The LVA work has not been the only source of influence on the drafting of the Vision Plan (Fig. 30) and the Development Concept (Fig 31) but the appreciation of the landscape character of the Site, its relationship with the settlement pattern and with the host countryside are relevant considerations that have contributed to the shape and placement of the proposed land uses. The findings of this study now provide a further layer of knowledge and appraisal of the landscape and visual baselines of the Site and its setting.



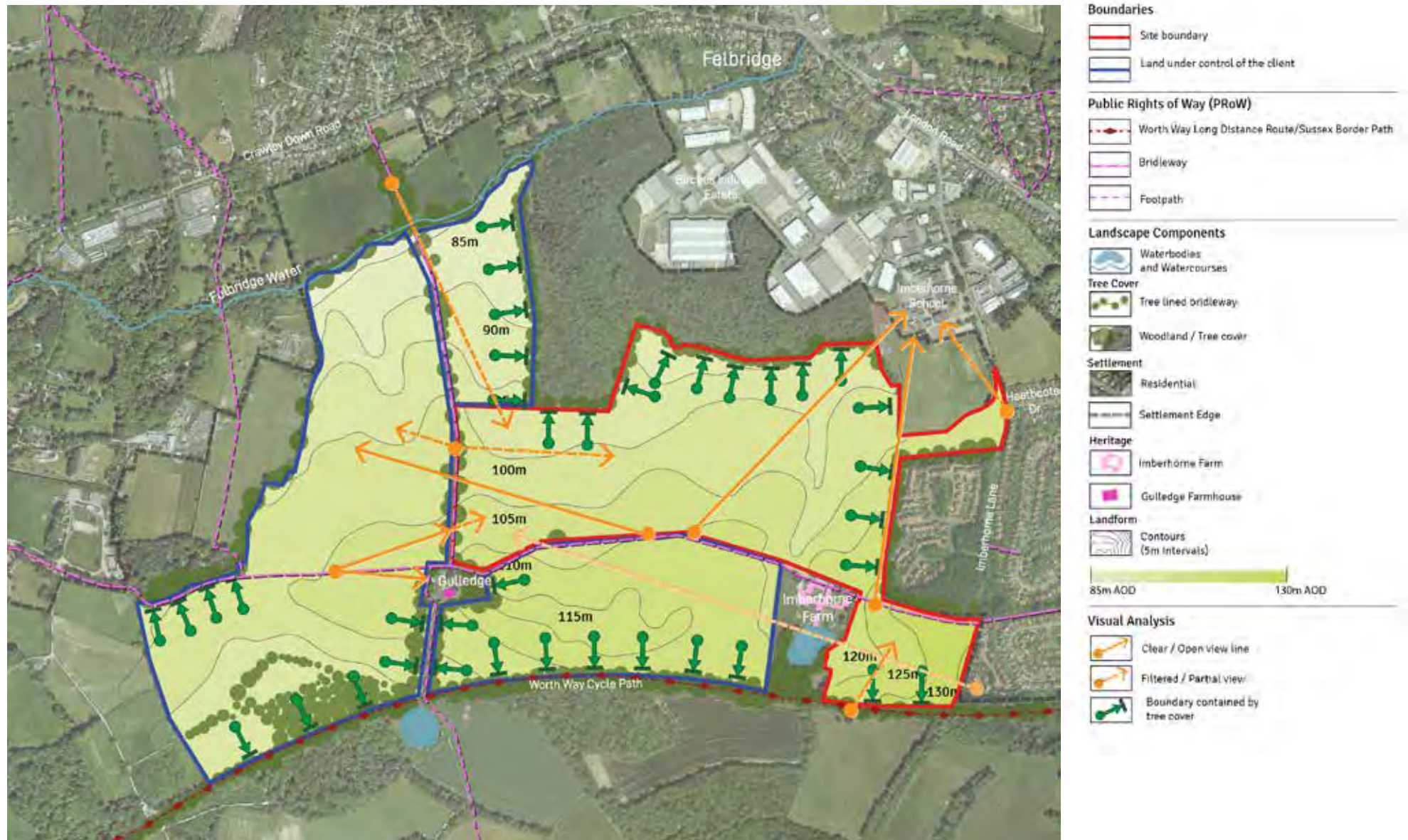


FIGURE 28. CONSTRAINTS AND OPPORTUNITIES PLAN



## 2.3 THE MAIN LANDSCAPE AND VISUAL CONSIDERATIONS

In this LVA, the points recorded here are an overview of the main landscape and visual considerations identified at this early stage of study, to inform development proposals. Further work will be required to refine and deepen the consideration of the effects of a change of use on landscape and visual receptors, as the proposals evolve.

### The main landscape considerations:

#### The relationship of the proposed development to the settlement

The Site relates to the settlement edge where it adjoins Imberhome Lane. The boundary is indented, complex and has land uses at the current interface with the countryside that are clearly visible from the countryside. Housing along Imberhome Lane and at the western end of Heathcote Drive are visible from the countryside for some considerable distance into the Site. They have a character influencing effect.

The new residential development off Kingscote Drive (Photo 3) is set within boundaries that are well defined by tree cover and the housing is visible, even in winter, from the countryside to the west. This strong enclosure formed by established trees also characterises the majority of the Site's boundaries.

Imberhome School similarly causes a change in the characterisation of the landscape of large areas of the Site (Photo 2). The school is set back from the edge of the Site, behind playing fields and this open green space makes a transition between farmland and settlement but the large buildings of the halls and teaching blocks are visually prominent and there is little sense that the layout of the school and its external spaces took much regard to this transition role at the urban/rural interface: there are no campus parkland tree lines at the boundaries for example. The change of use is quite stark. So too is the change of use between the properties along Imberhome Lane and the countryside (Photo 4). The highway currently forms an abrupt transition between the settlement and the adjoining countryside.

The Site sits against the settlement along much of its north eastern edge. It also sits close to, but does not adjoin the settlement edge at Felbridge along Crawley Down Road, set back east of Felbridge Water. The dip in landform towards this boundary again makes an link between the Site and the settlement.

To the west and south west the settlement at East Crawly is several kilometres away and the Site has little connectively or association with the towns to the west: this edge is characterised by the landscape of farmland and woods. The strong tree lines that line Gulleage Bridlepath act, with many other strong hedgerows to the west, to partition and contain to large open fields of the Site (Photo 8 + page 17).

#### The main Landscape issues: the relationship of the proposed development to the landscape character of the countryside

The Site sits in a field pattern that has seen considerable boundary change over the last 150 years (Figs 13-16). The very large fields within the Site today are result of twentieth century hedgerow removal. This is, consequently, a more open countryside than in 1870 for example. The landscape will have been more enclosed then, and would have had a smaller pattern, grain and scale. Today the field boundaries make a broadly rectilinear pattern, reinforced by watercourses and frequent hedgerow trees, but the scale is substantial.

The extensive tree cover around the Site has however endured: evidenced by the size, prominence and age of much of the trees and also by the records of the historic OS maps. The woodland and shaws that typify the character of the landscape setting, also have a very strong influence on the landscape character of the Site. The substantial areas of tree cover produce a landscape character that is one of considerable containment in the immediate and mid distance landscape. There are views from areas of the Site to expansive areas of high ground to the north – above the tree tops but the high ground is a long way away – too far to pick out points of detail (Photo 5). The tree cover is substantial and in many case very dense, typical of the High Weald landscape character area, and it forms a clear and substantive, locally typical, containment to the majority of the Site's edges.

Landform also contributes to the definition of the landscape character of the Site and its relationship to both the settlement and to the countryside setting. The comparatively high broad ridges and secluded valleys described in the High Weald landscape character areas are present across the Site, across the settlements and across the landscape of the host countryside. The landform pattern is strong, extensive in scale and characterised by countryside and settlement.

#### The main Landscape issues: the relationship of the proposed development to the constraints and opportunities of the Site

The LVA study has identified the key landscape baseline receptors of the Site. The value of the shape of the former field pattern and also existing and remaining field pattern, the strength and intact and enclosing nature of the boundary tree cover offer considerable potential to form a framework that belongs to the Site being drawn from the Site.

The physical landscape constraints present an opportunity for a development to find a sympathetic and appropriate response to the Site and setting. The shape and definition of the Site boundaries and its proximity to the settlement are strong factors that build a good relationship with the settlement and the host countryside.

#### The main Landscape issues: the capacity of the landscape of the Site

Although considered through desk based research and primary study in the field as a main landscape issue, in this LVA study the capacity of the Site has been set out in a separate Section in 2.1 above as there has been such a weight of published material that requires separate referencing.







ON SITE (PROW 44BEG) LOOKING WEST AT IMBERHORNE FARM



### The main visual considerations:

The visual constraints are based on an initial ZTV analysis of how the Site maybe seen and how residential development may be placed to avoid harm to receptors in the visual baseline. ZTV Target Points have been modelled within the Site, at high points and low point locations and at places that explore openness and containment. The process has sought to model a representative sample of areas of the Site. Already a good understanding of the role the Site plays in the landscape and in the setting for the town has been established.

Public domain viewpoints exist along Imberhome Lane and along the PRoW across and leading to the Site. The containment of the extensive tree cover restricts and limits many near Site views of the Site.

The Site is more visually discrete on the ground then it appears on a map. Tree cover, field divisions and the character of the rolling landform form result in only a limited number of properties having a clear and unfiltered line of sight to the Site.

The main Visual Receptor groups were identified in Section 1.12. The GLVIA 3 at 6.13 'Receptors of visual effects' explains the potential for 'differing responses to changes in views and visual amenity' that people will have depending on activity, expectation, location, time of day, season, and duration of consideration of the view. The analysis part 1 of this LVA draws some broad judgements about the Visual Receptors for the Site and describes the following groups:

#### Visual Receptors

- i. Residents of properties (Photos 3,4,11);
- ii. Walkers along Public Rights of Way including Worth Way (Photos 5,7,9);
- iii. Visual Receptors at Imberhome School (Photo 2); and
- iv. Road users (Photo 10,11);

This is an initial study and this is early analysis but these visual receptors can be described within four broad typologies:

#### Local Residents at home

At this stage of work within this LVA the thrust of study is on how a proposed promotion of the Site rather than a development proposal with a specific form can be best guided by landscape and visual guidance. The GLVIA at 6.30 gives further guidance on 'Assessing the significance of visual effects' and at 6.33 gives a suggested list of visual receptors most susceptible to change in the visual amenity. It places residents at home at the top of the list. At the Site the residents of properties that front Imberhome Lane (Photo 4) and within the Kingscote Way (Photo 3) development and at the western end of Heathcote Drive (Photo 11) have been shown to be limited in number and those that do may possibly have only limited views to the Site from first floor windows. This presumption comes from looking carefully on Site at the properties that windows visible from vantage points on site – just focusing on the obstructions and not the matter of whether the windows are within bathrooms, on stairs (as many would appear to be).

The obstructions are caused by the trees and hedgerow plants along the north eastern boundary of the Site record the extent of the considerable visual barrier created by this tree cover.

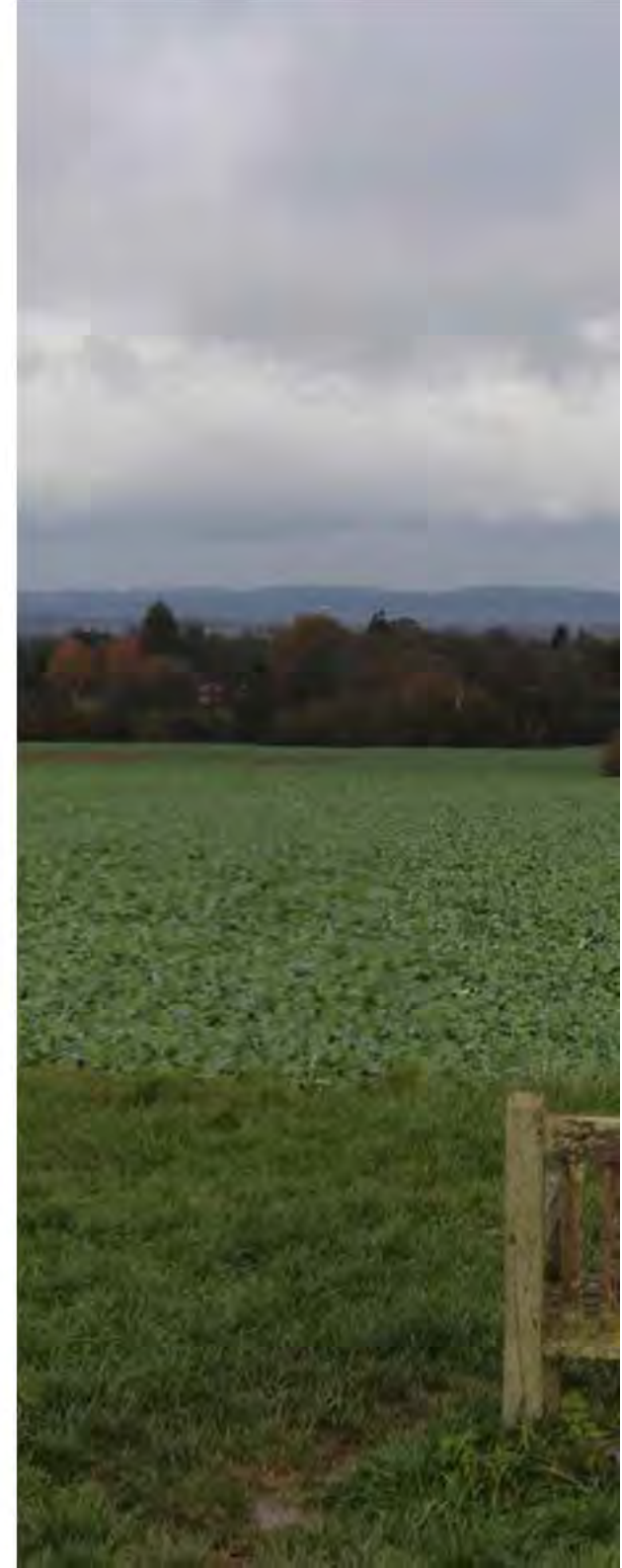
#### Road users

The LVA work has considered the approaches to the Site along the adjoining roads (Photos 4, 10, 11, 12).

Views are filtered and obscured to a large degree by the boundary hedgerows and tree cover. Where the Site is open to lengths of Imberhome Lane tree cover still frames and contains the lines of sight.

#### Walkers along Public Rights of Way

Perhaps it is reasonable to suggest that leisure walkers will have a broad panorama of the Sussex countryside to see along the PRoW's that cross the Site and that a focus on views to just the Site would be unlikely. This is not a designated landscape with any national value status. The field pattern and particularly the numerous field boundary hedges, hedgerows and trees frequently interrupt views to the Site from the PRoW's in the vicinity. The Site has a high visual prominence from these public footpaths as the paths cross the Site, but once past the Site the visually containing components, common in the landscape, filter, obscure, interrupt and significantly reduce the visual prominence of the Site, even from quite nearby locations along the paths. Worth Way for example runs for much of the boundary with the Site in a cutting that restricts views to the Site to the north (Photo 9 + pages 10,11). The well-established and substantial tree cover further restricts views.







ON SITE (PROW 44BEG) LOOKING ACROSS THE SITE TO THE BIRCHES WOODLAND AND OVER FELBRIDGE TO THE HIGH GROUND OF THE NORTH  
DOWNS AT 230M AOD APPROXIMATELY 15KM TO THE NORTH



## 2.4 THE DEVELOPMENT PROPOSAL

GLVIA Edition 3 gives guidance on the use of the LVA as a 'standalone appraisal' in Chapter 3, and at 3.2 recommends that nature of the proposed change or development is described. It is important to define the development proposal in order to have a clear understanding of the terms of reference of the judgements and early assessments made by the team of Landscape Architects.

The proposal is for a mixed use scheme comprising the expansion of Imberhorne Secondary School, a new Primary School and Early Years facility, circa 550 new homes, neighbourhood centre, a Care Village and a Suitable Alternative Natural Greenspace (SANG)/Country Park (to include infrastructure improvements, landscaping and enhanced green corridors). From the outset, the study within the LVA has been applied to inform these early concepts and to create a sympathetic response to the setting.

An initial vision for development on the Site was set out in the previous LVA (Fig. 29), and through continuing appraisal of the landscape and visual context of the Site, this has been refined further to respond to the landscape and visual issues identified.

In addition, an extensive swathe of Suitable Alternative Natural Greenspace (SANG) is now proposed on the western edge of the development, creating a sympathetic transition between the edge of settlement and wider countryside, and reinforcing the separation of East Grinstead from the surrounding settlements.



FIGURE 29. FORMER VISION PLAN



FIGURE 30. VISION PLAN





The updated and refined Vision for the Site (Fig. 30) includes:

- Development set more sympathetically within, and contained by, the existing landscape framework of fields, hedgerows and woodland
- Retention of the area of higher land within the southern part of the wider site free from development
- Setting development further back from the Worth Way/Sussex Border Long Distance Trail
- Clustering proposed schools and their associated extended facilities to relate well to the adjoining existing school uses
- Location of local centre alongside proposed schools uses to create a vibrant and active centre





FIGURE 31. CONCEPT MASTERPLAN



## Landscape Strategy

The Landscape Strategy has a clear objective: to realise to the full all the advantages already present in the landscape of the site, at the edge of the settlement and in the countryside setting. The object is to craft a new landscape that is distinctive in character and that belongs to the place and in so doing forms a strong, local and highly successful response to the place.

This over-arching objective sets out a clear requirement for the proposed landscape strategy that will deliver the opportunity for a memorable and enduring scheme. These strategies will make the most of the latent potential that is present in the landform; the extensive woodland, the Worth way cycle route, the connectivity with the countryside; and the links with the land and the history of the place.

The concept for the Landscape Strategy Plan shows the containment of the development within a profoundly green and planted framework. This protection of the countryside is important to the development. The relationship with the Sussex landscape is one of the strongest assets of the scheme. It is a relationship that will continue to be successful through the sensitive placement of building, the retention of trees and field patterns and through the creation of open spaces that increase GI connectivity and that make a good fit in the landscape.

The objective will be met as the public paths will pass through attractive, safe, locally distinctive public open spaces that present a far greater network of paths and accessibility to open green spaces than currently exists.

The finding of the LVA, in particular the comprehensive exploration and understanding of the existing landscape and visual context have shaped a Landscape Strategy, with the objective of creating a site specific, and appropriate, landscape framework within which to accommodate development, successfully assimilating residential development and the required associated components into both the edge of settlement location and the wider countryside.

### Planning Policy Guidance (PPG) on the Natural Environment (Updated 21st July 2019), to support the National Planning Policy Framework (NPPF).

#### Building a strong, competitive economy

Green infrastructure can drive economic growth and regeneration, helping to create high quality environments which are attractive to businesses and investors.

#### Achieving well-designed places

The built environment can be enhanced by features such as green roofs, street trees, proximity to woodland, public gardens and recreational and open spaces. More broadly, green infrastructure exists within a wider landscape context and can reinforce and enhance local landscape character, contributing to a sense of place and natural beauty.

#### Promoting healthy and active communities

Green infrastructure can improve the wellbeing of a neighbourhood with opportunities for recreation, exercise, social interaction, experiencing and caring for nature, community food-growing and gardening, all of which can bring mental and physical health benefits. Outdoor Recreation Value (ORVal) is a useful online tool that can be used to quantify the recreational values provided by greenspace. Green infrastructure can help to reduce health inequalities in areas of socio-economic deprivation and meet the needs of families and an ageing population. It can also help to reduce air pollution and noise.

#### Mitigating climate change, flooding and coastal change

Green infrastructure can contribute to carbon storage, cooling and shading, opportunities for species migration to more suitable habitats and the protection of water quality and other natural resources. It can also be an integral part of multifunctional sustainable drainage and natural flood risk management.

#### Conserving and enhancing the natural environment

High-quality networks of multifunctional green infrastructure contribute a range of benefits, including ecological connectivity, facilitating biodiversity net gain and nature recovery networks and opportunities for communities to undertake conservation work.



FIGURE 32. LANDSCAPE STRATEGY PLAN



## Green Infrastructure

The Landscape Institute Position Statement: ‘Making it home: the power of landscaping to create good housing’, (LI, 2010) promotes a philosophy of integration between the technical and creative aspects of new housing provision with a positive response to the landscape of the setting. In the Forward of ‘Making it home’ the President of the Institute states:

***“Whether the setting is urban or rural, far too many housing developments make little reference to the landscape in which they are set. The pressure in both public and private sectors is to maximise use of available space... many housebuilders are increasingly aware that creating successful developments requires that local context, character and culture are part of the planning, design and management process.”***

This exemplar approach lies at the heart of the proposal for the mixed-use development at Imberhorne Farm. Its application is evidenced by the importance given at this early stage in the design of the development, to a successful Green Infrastructure Strategy.

## GI Network links

The linkage between the scheme and the nearby settlements at East Grinstead and Fellbridge, and importantly with the Sussex countryside, will be made through physical connections: the paths and cycle routes, and through the visual lines of sight. The site has established and well-defined boundaries – principally the extensive tree cover around many of its boundaries. Where there are views to the setting, the viewpoints will be created to take advantage of the visual links. This linkage is also made through the culture and history of the place. Our approach as designers of the new landscape is to make a respectful response to these components in the landscape.

The Green Infrastructure (GI) of the new scheme is integral to the nature and quality of the new environment. The public realm will be rich in places for people to enjoy and it will also contain and define the limits of the development. The Landscape Strategy is to craft the

green spaces in a manner that achieves a sensitive and successful fit in the Warwickshire landscape whilst also making green spaces people want to have pride in and to call home.

The Green Infrastructure Strategy is an integral part of the Development Proposal and is embedded in the concepts for the Masterplan. A central goal for the GI Strategy will be to strengthen existing links to the wider Green Infrastructure network. Through the creation of new connections, the proposed green spaces will be formed and managed to enrich and diversify habitats of value. The approach will be to balance the pressures and needs of the public for access to green spaces and countryside, with the establishment of durable plant and animal communities. It will address measures to mitigate the impacts of climate change.

This approach has been central to the process that establishes the concept for the masterplan. The key objective for the masterplan has been to set the future development into the host landscape in a manner that achieves a sympathetic and successful assimilation in the countryside at the settlement edge.

## Existing ‘Green Capital’

Existing components: Field pattern, hedgerows and trees – the ‘Green Capital’, in association with new green spaces will give form and structure to the new GI. The existing components in particular the landform and the extensive tree cover around the boundaries will be connected by new green areas to form a network of biodiverse planted linked spaces and habitats. UK BAP habitats in Sussex include a range from lowland farmland, woodland to coastal habitats, those of which are relevant to the Site include Hedgerows; Lowland meadows; Traditional orchards and Ponds. These habitats have been incorporated into the development proposals as part of a connected Green Infrastructure providing significant site level enhancements, and also providing increased connectivity for existing and proposed habitats, linking hedgerows, wetland habitats and the provision of a network of niches within the landscape.

## Suitable Alternative Natural Green space: the SANG land

Concept proposals for the 42.07 ha of the SANG land were worked-up in 2019. The principles for the proposals were discussed between the Project Team of Landscape Architects, Engineers and Ecologists, and Officers at MSDC. The proposals for the semi-natural land of the SANG form an important attribute and will be an environmental asset for the development. The SANG sits within well defined and easily recognisable boundaries. It is an attractive open area that is well located to serve the residents of the development as well as the existing communities.

New areas of publicly accessible open green space will be run through the entire development, creating a new connected network of spaces, corridors, and links west, to the semi-natural landscape of the SANG. It will also provide linkage to other GI assets beyond the Site. The existing components will be retained and further enhanced, and the development arranged around it, to provide strategic and meaningful space with a strong sense of place.

A high-level GI and Landscape Strategy proposes the division and softening of the development. On the gently sloping ground this will give the impression of layers of tree canopies between the blocks of development. The SANG will be visible from parts of the development and will provide benefits of greenery beyond its immediate boundaries. The visual GI linkages through the Site are important and will also create a sense of a settlement being set in between trees.

## Essential Features

The proposal for the SANG land will provide the following essential Landscape features that are required in order for the land to fulfil its purpose as a SANG:

- Natural greenspace with areas of open (non-wooded) countryside and areas of dense and scattered trees and scrubs. Land should preferably not be entirely flat.
- A range of habitats should be provided for users to experience if the SANG site is larger than 12Ha.
- Perceived as semi-natural with few buildings or artificial structures except in the immediate vicinity of car parks.
- Perceived as safe – no tree or scrub cover along parts of the walking routes.
- No unpleasant intrusions (e.g. sewage treatment smells etc)

Currently biodiversity on the Site is considered to be of limited ecological value, being limited to arable fields with arable field margins consisting of poor semi-improved grassland habitats. Both of these habitats are common and widespread.

The Green and Blue Infrastructure Proposals provide the following enhancements and benefits:

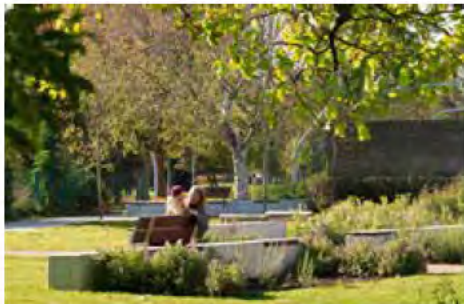
- The proposed SANGs land, proposed on the western aspect, will provide a greater diversity of habitats present within the current boundaries of the site, including meadow grassland; trees, shrub and woodland planting; a pond and wetland and an orchard.
- UK BAP habitats in Sussex include a range from lowland farmland, woodland to coastal habitats, those of which are relevant to the Site include Hedgerows; Lowland meadows; Traditional orchards and Ponds. These habitats have been incorporated into the development proposals as part of a connected Green Infrastructure providing significant site level enhancements, and also providing increased connectivity for existing and proposed habitats, linking hedgerows, wetland habitats and the provision of a network of niches within the landscape.
- A mosaic of habitats created within the boundary provides a diverse and rich landscape.
- Proposed woodland planting, and an increase in diversity of grassland, provides a significant enhancement for foraging and commuting habitats for bats.
- The creation of a nectar rich, and native landscape, will enhance the opportunities for a number of invertebrates species present.



FIGURE 33. GREEN INFRASTRUCTURE PLAN



### Green Infrastructure Precedent Imagery







## Blue Infrastructure

The Green Infrastructure Strategy for the development contains a strategy for Blue Infrastructure – the management and care of the environment associated with water systems. In this LVA the objectives for Blue Infrastructure are described, in outline, in this section. The BI will comprise the aspirations for a multi-purpose approach to the green spaces in the development. It will comprise and deliver the requirement of Sustainable Urban Drainage (SuDs) and a water treatment train that looks at natural measures to ensure the protection of water quality. Flood prevention measures will be drafted to have an awareness and responsibility to also deliver public amenity and biodiversity gains. The Sustainable Urban Drainage system will require several basins to be created to attenuate surface water and these have been set within green spaces. The basins, swales, ditches, rills and 'Rain Gardens' will be located to serve drainage operational requirements. The modern, forward looking SuDs regime within the scheme will capture the opportunities for biodiversity enrichment through wetland habitat creation and management.

The Drainage Strategy provides a significant enhancement to the Blue Infrastructure on the Site.

The drainage proposals

- Follow, incorporate and extend the existing network of watercourses and ponds, in line with the West Sussex Policies (SuDs Policy 1 and 3) for the Management of Surface Water
- Provide management for flood risk, with attractive solutions such as connected swales, ponds and attenuation features, integrated within the layout and design of the proposals, with their management and maintenance considered from the outset, in line with SuDs Policies 2 and 6
- Include ponds and swales, located with the open space network, have been designed to complement and contribute to the multi-functional amenity of the open space for the development, such as providing a village pond as a focal point for local centre, in line with SuDs Policy 8
- Provide a network watercourses, swales and ponds that respond to the landform of the Site, dropping into the valley formed by Felbridge Water, to the north of the Site, connecting into the wider network of blue infrastructure, and reflecting and complementing the wider valley landscape in line with SuDs Policies 3 and 10
- Include permeable paving in areas such as car parking courts, private driveways and communal areas to contribute to the surface water treatment at source within the development
- Contribute to increased biodiversity across the Site, through the provision of ponds and swales, and the associated diversity of marginal/riparian habitats, in line with SuDs Policy 9



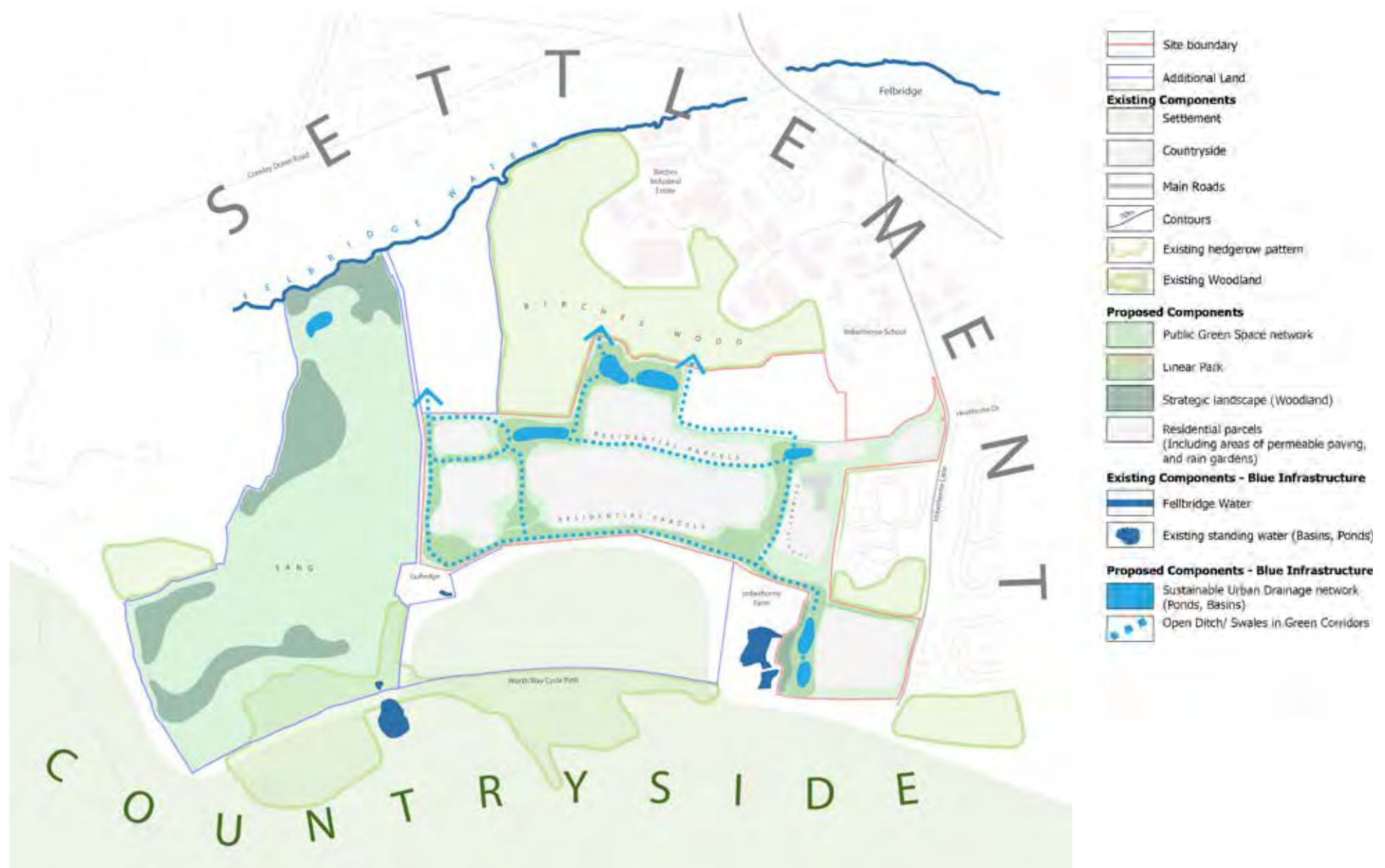


FIGURE 34. BLUE INFRASTRUCTURE PLAN



### Blue Infrastructure Precedent Imagery

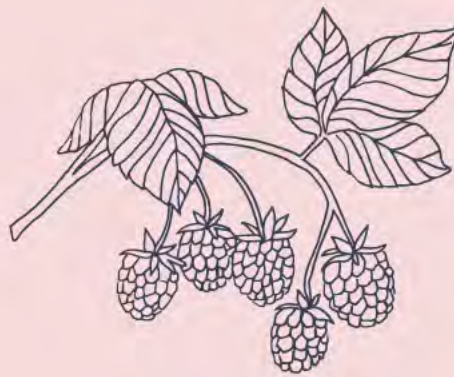












### 3. SUMMARY

The allocation of the Site as residential land will change the status of the land – countryside will become settlement and the findings of the LVA work suggest how a successful development proposal could demonstrate a sympathetic and successful response to the edge of settlement and countryside setting. The Landscape Constraints and Opportunities plan gives a summary of the key considerations and it is drawn from a careful study of the landscape of the Site and its setting.

The landscape of East Grinstead and the Site sits within in the NCA 122 High Weald National Character Area. Qualities of the National Character Area are evident in the Site and its immediate setting: the gently rolling broad ridge farmland landscape with secluded small valleys. This landscape displays a strong cohesive quality – its landscape character is evident and discernible, over a considerable area. Development on the Site would not cause harm to the landscape character of the setting. The Site would change from farmland to settlement and this LVA has already set out constraints drawn from an evidence base that look to guide a development proposal to form a responsive, positive and successful fit in the host landscape, without harm to the character of the wider countryside; and to make a positive intervention that contributes to the distinctiveness of the settlement of East Grinstead, and maintaining the separate identity of other surrounding settlements, without harm.

This LVA study has modelled the hedgerows, the tree cover and the settlement of East Grinstead within a Zone of Theoretical Visibility model that has been used to inform field work. The ZTV model has ensured that an appraisal of how the Site currently sits in the landscape and how a development may result in changes to specific Visual Receptors have been adequately predicted and investigated.

The LVA work has established that the Site sits discretely in both the local and wider landscape, benefiting from strong visual and physical containment. It has well defined boundaries made by tree cover, by hedges and hedgerows with substantial trees.

The Site provides the opportunity not only to deliver residential development, also the opportunity to provide significant enhancements to the Green and Blue Infrastructure on the Site, including a substantial swathe of SANG, providing improved connectivity with the surrounding countryside and much wider benefits to not only future residents, but also the existing surrounding communities.

A future residential development of the Site, guided by landscape led principles, as set out in this LVA, could form a sympathetic and successful relationship with both countryside and the settlement, reflecting its location at the interface of rural/urban edge.

There are clear reasons, established as an evidence base and recorded within this LVA study, that have demonstrated that the Site has the capacity to accommodate residential development without significant harm to the setting – both countryside and town.



FIGURE 35. CONCEPT MASTERPLAN





PERMISSIVE PATH - P20 IMBERHORNE SCHOOL FROM IMBERHORNE LANE NEAR IMBERHORNE FARM







**BARTON  
WILLMORE**



Welbeck Land Ltd

# **Imberhorne Farm, East Grinstead**

Transport Appraisal

101470

17/07/2020

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## Appendices

Appendix A	Local Amenities Plan
Appendix B	Indicative Access Drawings



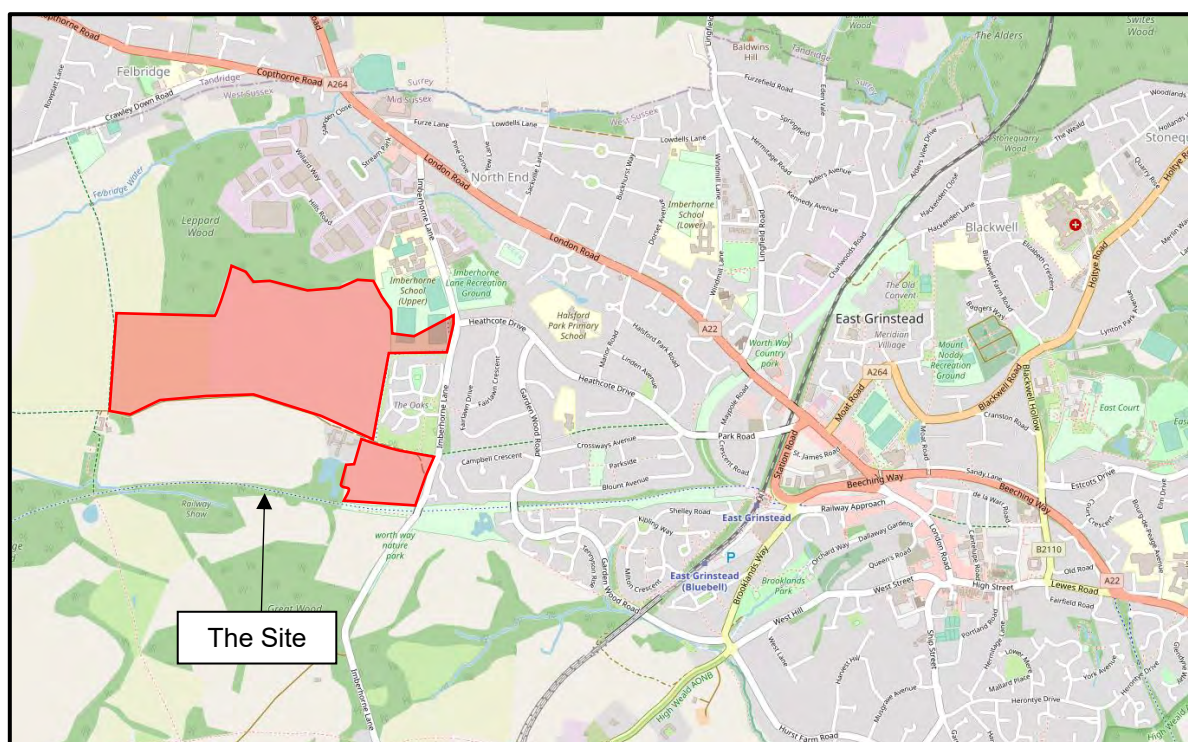
## 1 Introduction

- 1.1 Pell Frischmann (PF) is commissioned by Welbeck Strategic Land II LLP (the 'Promoter'), to provide transport planning and highways consultancy services, in connection with the proposed redevelopment of land at Imberhorne Farm, East Grinstead (the 'Site'). The Local Planning Authority (LPA) is Mid Sussex District Council (MSDC), and the Local Highways Authority (LHA) is West Sussex County Council (WSCC).
- 1.2 This Transport Appraisal has been prepared to summarise the findings of the various transport studies undertaken to date to support the development of the site to provide in the region of 550 residential dwellings (use class: C3), a care village and community uses, alongside appropriate access and infrastructure.

## Site Location

- 1.3 The Site is located to the west of Imberhorne Lane, to the west of the centre of East Grinstead, a site location plan is provided at **Figure 1.1**.

**Figure 1.1 Site Location Plan**



Source: OpenStreetMap with Pell Frischmann annotations.

## Summary of Current Position

- 1.4 The Site is currently a proposed allocation within the Mid Sussex Site Allocations DPD (March 2020) as “Land South and West of Imberhorne Upper School”, policy reference “SA20”. The overriding objective for the site as set out within the plan is:

*“To deliver a high quality and sustainable extension to East Grinstead, which facilitates the expansion of Imberhorne Upper School, and is informed by a landscape led masterplan creating a development which is sensitive to the rural setting of the nearby heritage assets, and includes generous green infrastructure corridors to contain the built form. The development shall establish a strong sense of place and include a neighbourhood centre, whilst providing good permeability across the site with*

*attractive pedestrian and cycle routes throughout; contributions will be sought towards sustainable transport and highway infrastructure improvements in the vicinity of the site.”*

- 1.5 In respect of Highways and access the draft allocation sets out the following objectives for the development of the Site:
- *“Provide a sustainable Transport Strategy which identifies sustainable transport infrastructure improvements and demonstrates how the development will integrate with and enhance the existing sustainable transport network providing appropriate enhancements to the existing public transport networks and safe and convenient routes for walking and cycling to key destinations and links to the existing networks.*
  - *Mitigate development impacts by maximising sustainable transport enhancements; where addition impacts remain, highway mitigation measures will be considered. Working collaboratively with Surrey and West Sussex County Council Highway Authorities and taking account for sustainable transport interventions, contribute towards providing any necessary capacity and safety improvements to junctions impacted upon by the development in the vicinity of the site along the A22/A264 corridor.*
  - *Vehicular access and necessary safety improvements will be provided on Imberhorne Lane; the access shall include footpaths to either side to connect with the existing pedestrian network along Imberhorne Lane.*
  - *Contribute towards improvements to and positively integrate the PRow which cross the site, including providing an access link into the Worth Way cycle/pedestrian path (Three Bridges – East Grinstead).”*
- 1.6 This report will look to provide an update on the evolution of the proposals to develop the Site in respect of transport and highways and how the site will look to meet and exceed the overarching highways and access objectives of the allocation.

## Report Structure

- 1.7 Following this introductory chapter, the remainder of this report is structured as follows:
- Chapter 2: Sustainable Travel Opportunities;
  - Chapter 3: Access Opportunities;
  - Chapter 4: Development Impact;
  - Chapter 5: Summary and Conclusions.

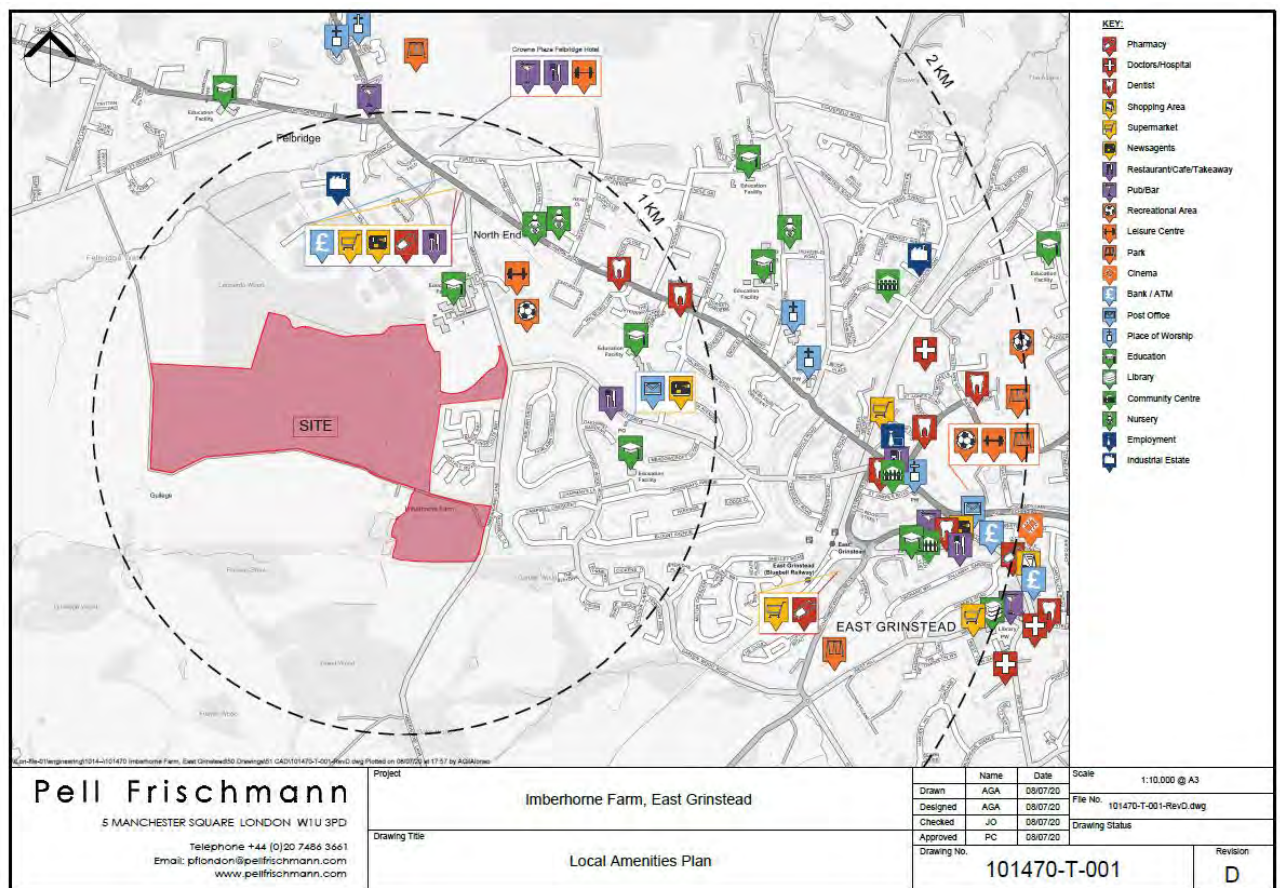
## 2 Sustainable Travel Opportunities

- 2.1 This chapter sets out the opportunities to connect the site to local facilities and services via sustainable modes of travel including rail, bus, walking and cycling.

### Local Amenities

- 2.2 The Site is well located to take advantage of a number of local services including schools, retail, employment and health services in the immediate vicinity of the site and is a less than 1.5km from East Grinstead town centre where further retail, leisure and employment facilities are available. The local amenities are presented on **Figure 2.1** and at **Appendix A**.

**Figure 2.1 Local Amenities Plan**



Source: Pell Frischmann

- 2.3 The key local services within close proximity of the site are summarised in **Table 2.1**.



**Table 2.1 Summary of Local Amenities**

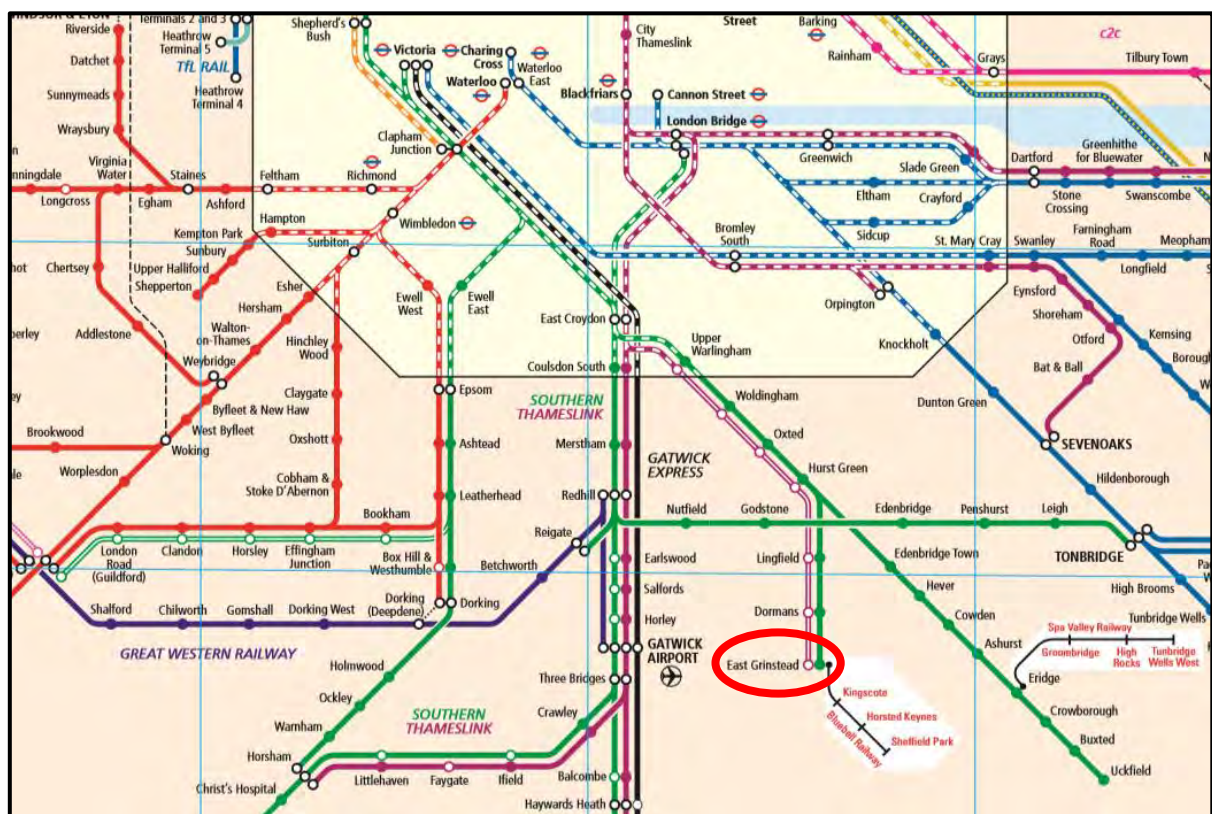
Type of Amenity	Amenity	Location	Distance from the Site
Food retail	Chapman's Newsagents / Post Office	Heathcote Drive	500m
	M & S Simply Food	London Road	750m
	Londis	London Road	750m
	Sainsbury's	Firbank Way	1.4km
	Aldi	Park Road	1.4km
Education	Imberhorne School (Upper)	Imberhorne Lane	0m
	Imberhorne School (Lower)	Windmill Lane	1.4km
	Halsford Park Primary School	Manor Road	800m
	St. Peter Catholic Primary School	Chapman's Lane	700m
	Fledglings Day Nursery & Pre-School	London Road	700m
	Felbridge County Primary School	Crawley Down Road	1.3km
Leisure	Imberhorne Recreation Ground	Imberhorne Lane	80m
	Kings Leisure Centre	Moat Road	1.8km
Healthcare	Bupa Dental Care	London Road	550m
	Moatfield Surgery	St Michael's Road	1.7km
Transport	East Grinstead Railway Station	Station Road	1.3km
	Bus Stops	Imberhorne Lane	300m
	Bus Stops	Heathcote Drive	250m

## Public Transport

### National Rail Services

- 2.4 The Site is located approximately 1.3km west of East Grinstead Station, which is served by Southern Rail and Thameslink services. East Grinstead Station is highlighted on the London and South East Rail Services Map at **Figure 2.2**. The station is managed by Southern Rail who operate the majority of services to and from the station. The route of the Southern services is shown via the green line routing north via Lingfield, East Croydon and Clapham Junction to London Victoria. The purple coloured line from the station shows the route of Thameslink services from the station north via East Croydon, London Bridge and onto Bedford via St Pancras International and Luton Airport Parkway. As shown in black the Bluebell Heritage Steam railway also operates from the station.

**Figure 2.2 London and South East Rail Services Map**



Source: National Rail (2020)

- 2.5 As shown in **Figure 2.2** key connections can be made at East Croydon for Gatwick Airport and Brighton to the south, at London Bridge for services to Kent and at Clapham Junction for services to the South West of England. A direct connection to international services can also be made at London St Pancras International. A summary of service frequencies is provided within **Table 2.2**.

2.6

**Table 2.2 East Grinstead Rail Services**

Destination	Services	Average Journey Time	On Peak Frequency	Off Peak Frequency
East Croydon	Southern & Thameslink	40 minutes	4 per hour	2 per hour
Clapham Junction	Southern	52 minutes	2 per hour	2 per hour
London Victoria	Southern	59 minutes	2 per hour	2 per hour
London Bridge	Thameslink	55 minutes	2 per hour	n/a
St Pancras International	Thameslink	70 minutes	2 per hour	n/a

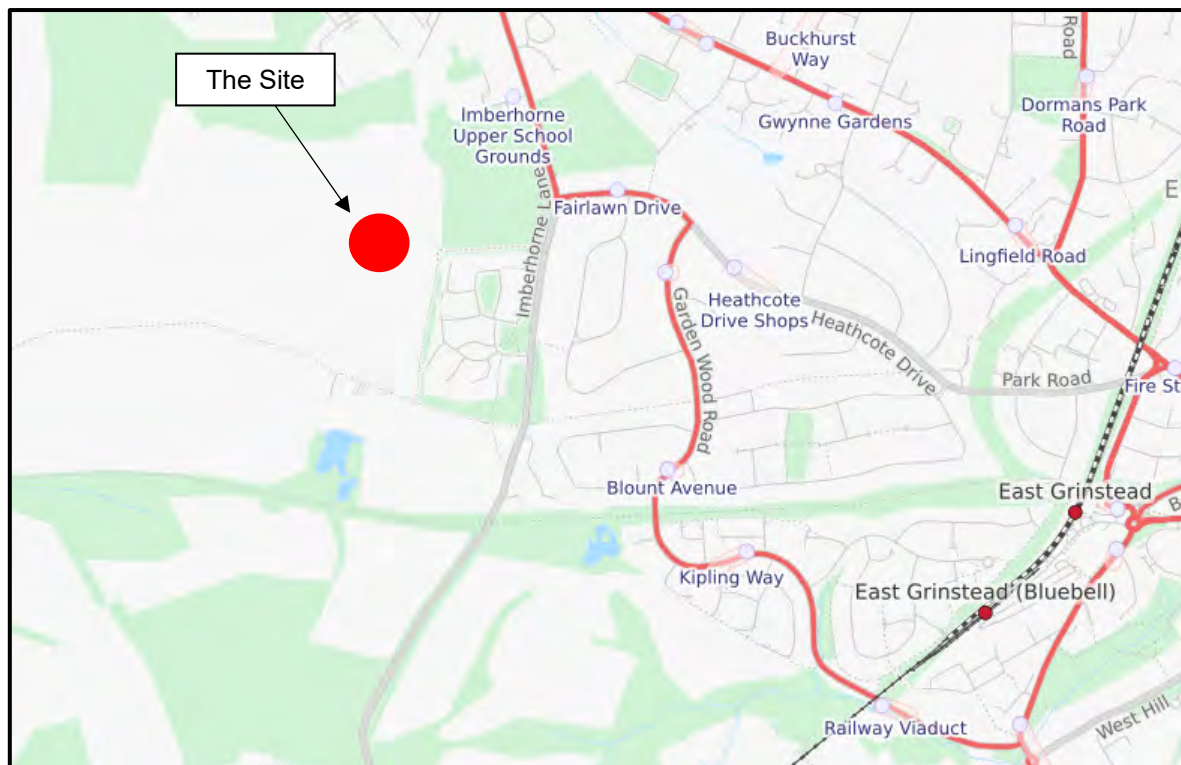
Source: National Rail.

- 2.7 Facilities at East Grinstead Station include approximately 96 secure cycle parking spaces alongside car parking and a taxi rank along with seated waiting areas and coffee kiosk.

## Local Bus Services

- 2.8 As noted above there are a number of bus stops located within a short walking distance of the site, including those located on Imberhorne Lane and Heathcote Drive as shown on **Figure 2.3** below. In addition to these local services further regional services can be caught from London Road and East Grinstead Railway Station.

**Figure 2.3 Local Bus Stop Locations**



Source: Open Street Map (2020)



- 2.9 These bus stops connect the site with East Grinstead Railway Station, town centre and regional destinations including Crawley and Lingfield. A summary of the services available are included in **Table 2.3**.

**Table 2.3 Local Bus Services**

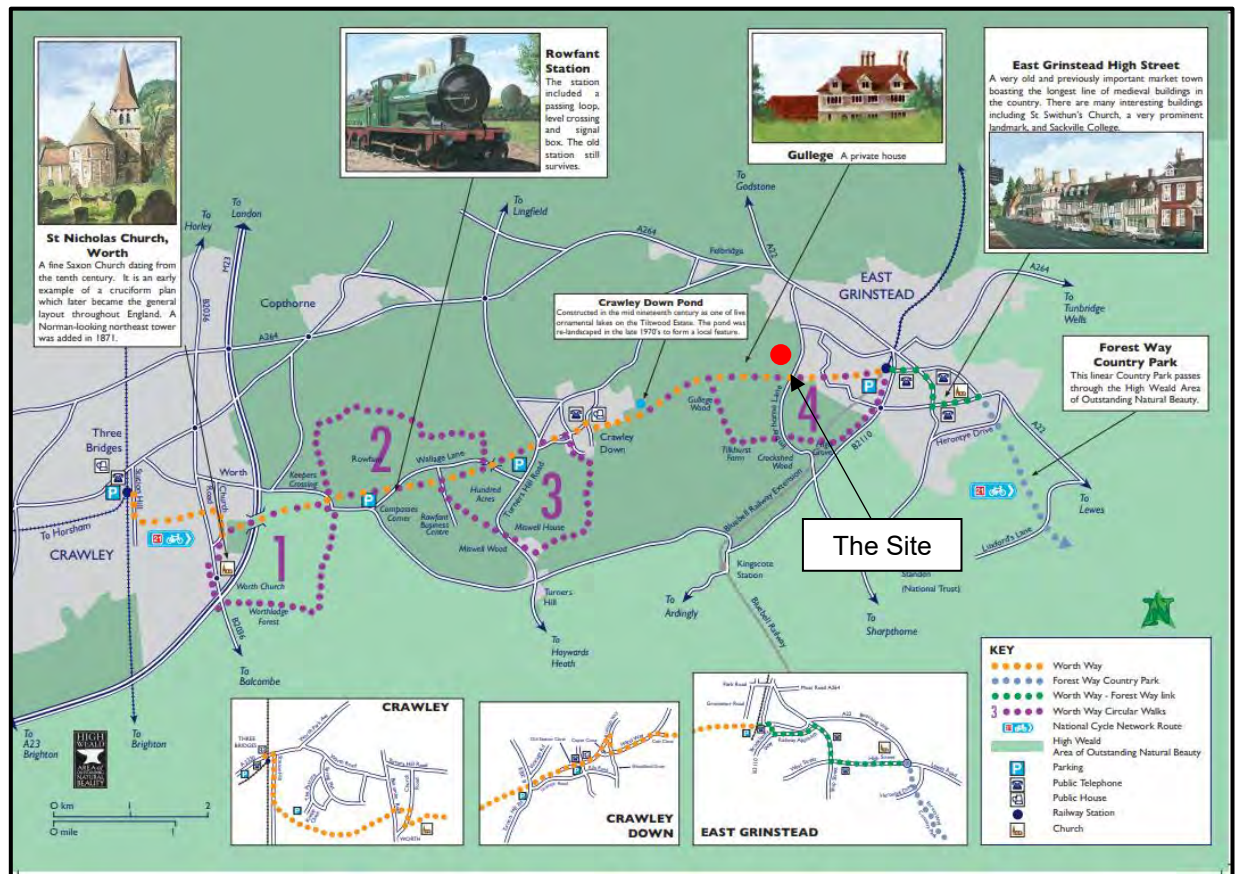
No.	Bus Stop	Route	Weekday Frequency	Weekend Frequency
84	Heathcote Drive	Crawley – East Grinstead	1 per 120 mins	1 per 120 mins
281	Heathcote Drive	Crawley – East Grinstead – Lingfield	1 per 120 mins	1 per 120 mins
291	London Road	Crawley – East Grinstead – Tunbridge Wells	1 per 60 mins	1 per 60 mins
400	London Road	Caterham – Redhill – Gatwick – Crawley – East Grinstead	1 per 60 mins	1 per 60 mins
236	East Grinstead Railway Station	East Grinstead – Lingfield – Edenbridge – Oxted	1 per 120 mins	1 per 120 mins
261	East Grinstead Railway Station	Uckfield – East Grinstead	1 per 120 mins	1 per 120 mins
270	East Grinstead Railway Station	East Grinstead – Haywards Heath – Burgess Hill – Brighton	1 per 60 mins	1 per 60 mins
400	East Grinstead Railway Station	East Grinstead – Crawley – Gatwick – Redhill – Caterham	1 per 60 mins	1 per 60 mins
409	East Grinstead Railway Station	East Grinstead – Godstone – Caterham - Selsdon	1 per 60 mins	1 per 60 mins

## Active Travel

### Walking

- 2.10 It is generally accepted that for journeys of up to 2km, walking is an appropriate mode to replace car trips and this is set out in The Chartered Institution of Highways and Transportation (CIHT) Guidelines ("Guidelines for Providing for Journeys on Foot" 2000) which suggests a maximum 'acceptable' walking distance for pedestrians without mobility impairment of 2km.
- 2.11 Along the site frontage there are continuous footways on the eastern side of Imberhorne Lane, which connect the site with London Road to the north. There are also continuous footways on both sides of Heathcote Drive, which are wide and well lit, connecting the Site with the centre of East Grinstead via Park Road and London Road. To the south of the site runs Worth Way which is a shared walking and cyclist leisure route connecting East Grinstead to Crawley Down and Three Bridges to the west. The Worth Way walking route is shown on **Figure 2.4**. In addition, further leisure routes are provided from Felbridge to the north of the site to the Gullege Farmhouse along The Gullege path. To the east the Worth Way continues onto the Forest Way and onto Crowborough.

**Figure 2.4 Worth Way Map**



Source: West Sussex (2020)

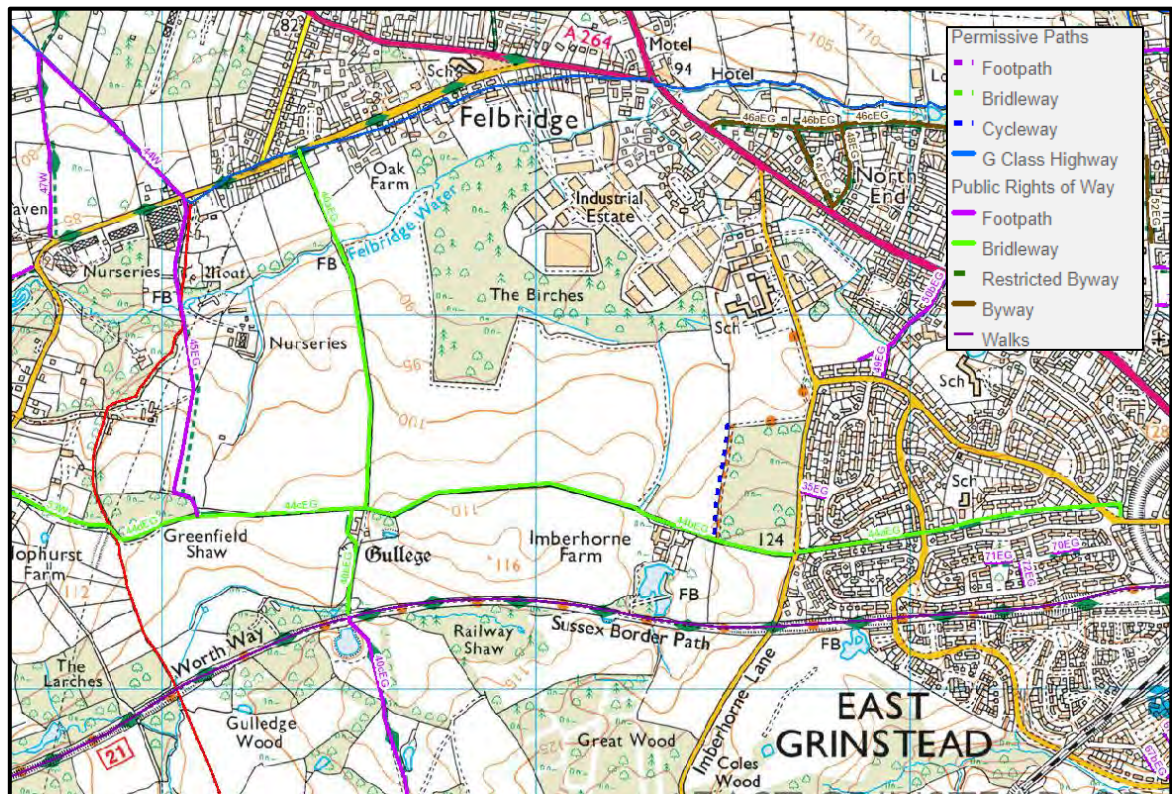
## Public Rights of Way

- 2.12 There are a number of Public Rights of Way within the vicinity of the site, as shown on **Figure 2.5** below, an extract from the West Sussex CC IMap shows bridleways traversing and bounding the site to the west. Along with the cycleway at the western edge of the site and several footways are shown locally.
- 2.13 The existing PRoW within and around the site will be enhanced and upgraded where appropriate, with connections to existing routes coordinated with the proposed internal walking and cycle networks to ensure a fully integrated and comprehensive network is provided.

## Strategic SANG

- 2.14 As part of the development proposals, a strategic SANG (Suitable Alternative Natural Greenspace) will be provided to the west and south of the site. This will provide a recreational walking area, with a defined walk of approximately 2.3km in length for both future residents of the site and for public use.

**Figure 2.5 West Sussex PRoW Map**

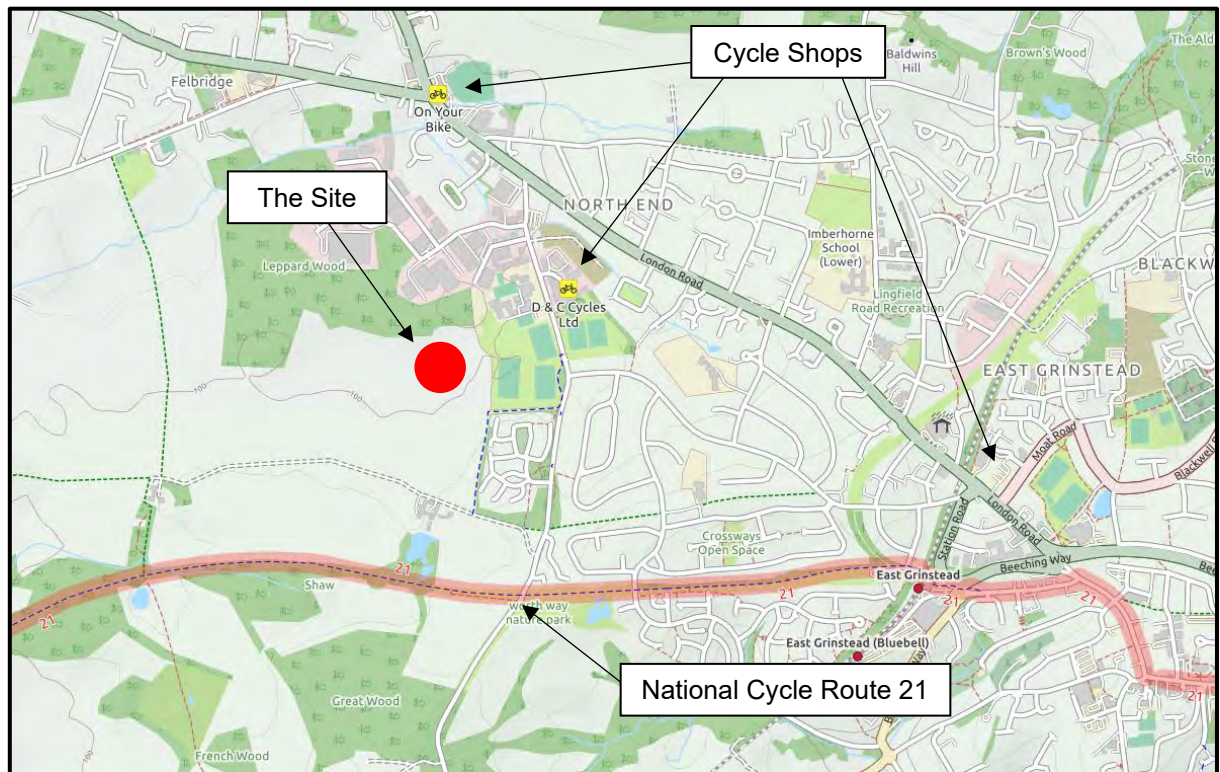


## Cycling

- 2.15 Accepted guidance suggests that for journeys up to 5 kilometres, cycling represents an important mode of transport. This offers the opportunity for cycling to be used as the primary mode of travel for both commuting and leisure trips to a wide range of destinations.
- 2.16 National Cycle Network (NCN) Route 21 runs in an east-west direction to the south of the site along the Worth Way, and provides a long-distance cycle route, comprising both on and off-road sections, between London and Eastbourne. Locally, it connects East Grinstead with Forest Row, Groombridge and Crawley. There are also three cycle shops close the site which are identified on **Figure 2.5** below. There is a dedicated cycleway on London Road and West Sussex CC have recently applied for funding (as part of post covid-19 measures) to extend this cycle way from Englee to the Lingfield roundabout.
- 2.17 As noted above there are approximately 96 secure and covered cycle parking spaces available at East Grinstead Railway Station.



**Figure 2.6 Cycle Facilities**



Source: Open Street Map (2020)

## Sustainable Development Opportunities

- 2.18 A number of sustainable transport opportunities have been identified at the site, including providing a link from the site to the Worth Way to facilitate off road walking and cycling trips to East Grinstead Station and Crawley Down and Three Bridges to the west along with leisure use.
- 2.19 Furthermore, the development will see the expansion of the adjacent Imberhorne Upper School adjacent to the site and the creation of a two-form entry primary school. This therefore is considered likely to reduce the need for education-based trips by residents to be taken by private car.
- 2.20 A detailed sustainable transport strategy will form an integral part of the Transport Assessment which will be produced at the planning application stage to support the development. This will include details of improvements and enhancements to on and off-site sustainable transport infrastructure and how sustainable travel will be promoted from the outset of the scheme through the introduction of a detailed and robust Travel Plan.

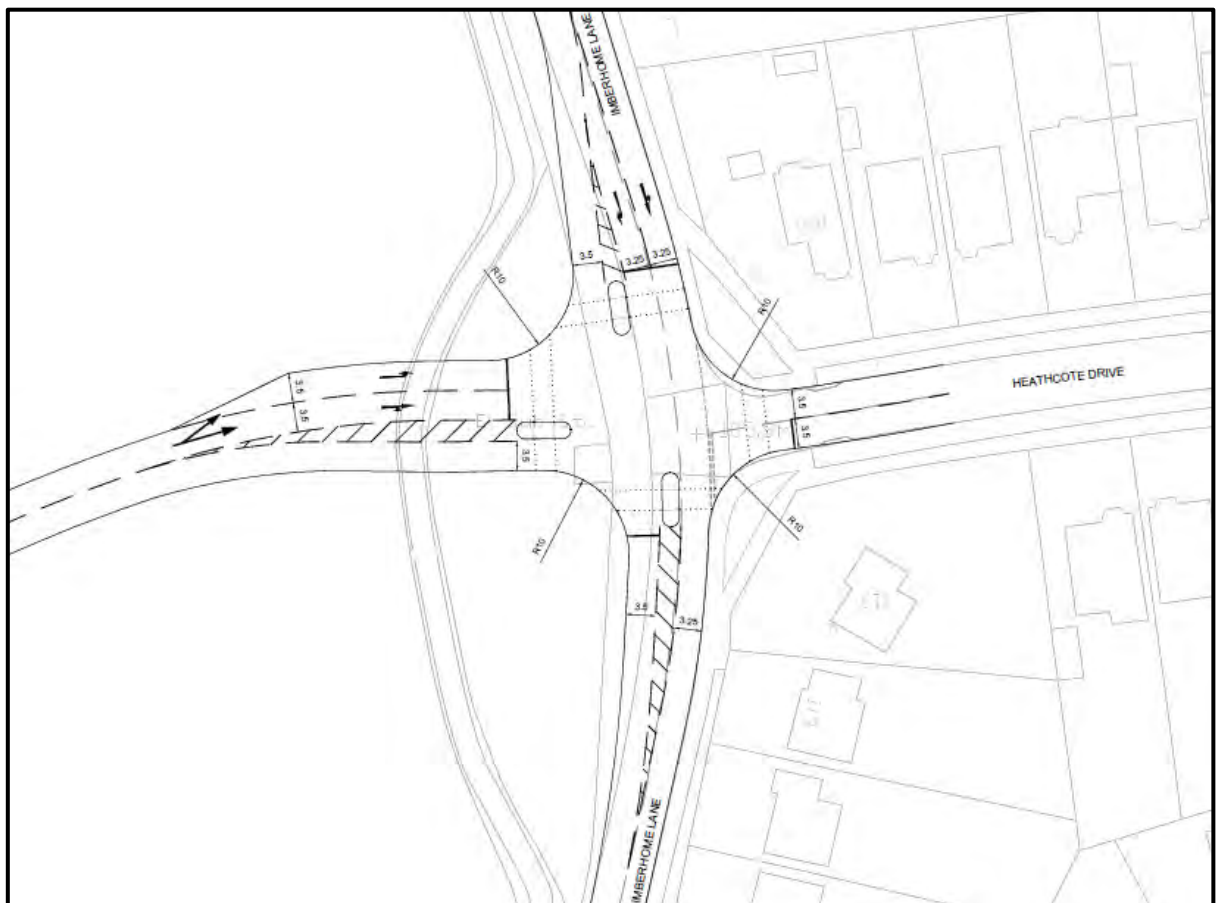
### 3 Access Strategy

- 3.1 The proposed access strategy has been developed following a detailed review of the local highway network, land and highways ownership boundaries and the function and scale of access required to serve the proposed development. These are agreed in principle with the Highways Authority.
- 3.2 It is considered that the optimal location for connecting the site to the local highway network is to reconfigure and create a 4<sup>th</sup> arm from the existing Imberhorne Lane and Heathcote Drive Junction. Two junction types have been designed in this location to ensure that flexibility regarding the access strategy is retained, and that the preferred option can be refined as the development proposal proceeds towards the planning application stage. The key principles of each option are outlined below.

#### Option 1 – Signal Controlled Junction

- 3.3 The primary option considered is to provide access to the site via a four-arm signal-controlled junction formed between the site access, Imberhorne Lane to the north and south and Heathcote Drive to the east. Two lanes of entry would be provided at the site access and for southbound traffic on Imberhorne Lane with a single-entry lane for the southern and eastern arms. **Figure 3.1** shows the proposed layout of the junction and the technical drawing is included at **Appendix B**.

**Figure 3.1 Option 1 – Signal Controlled Junction**



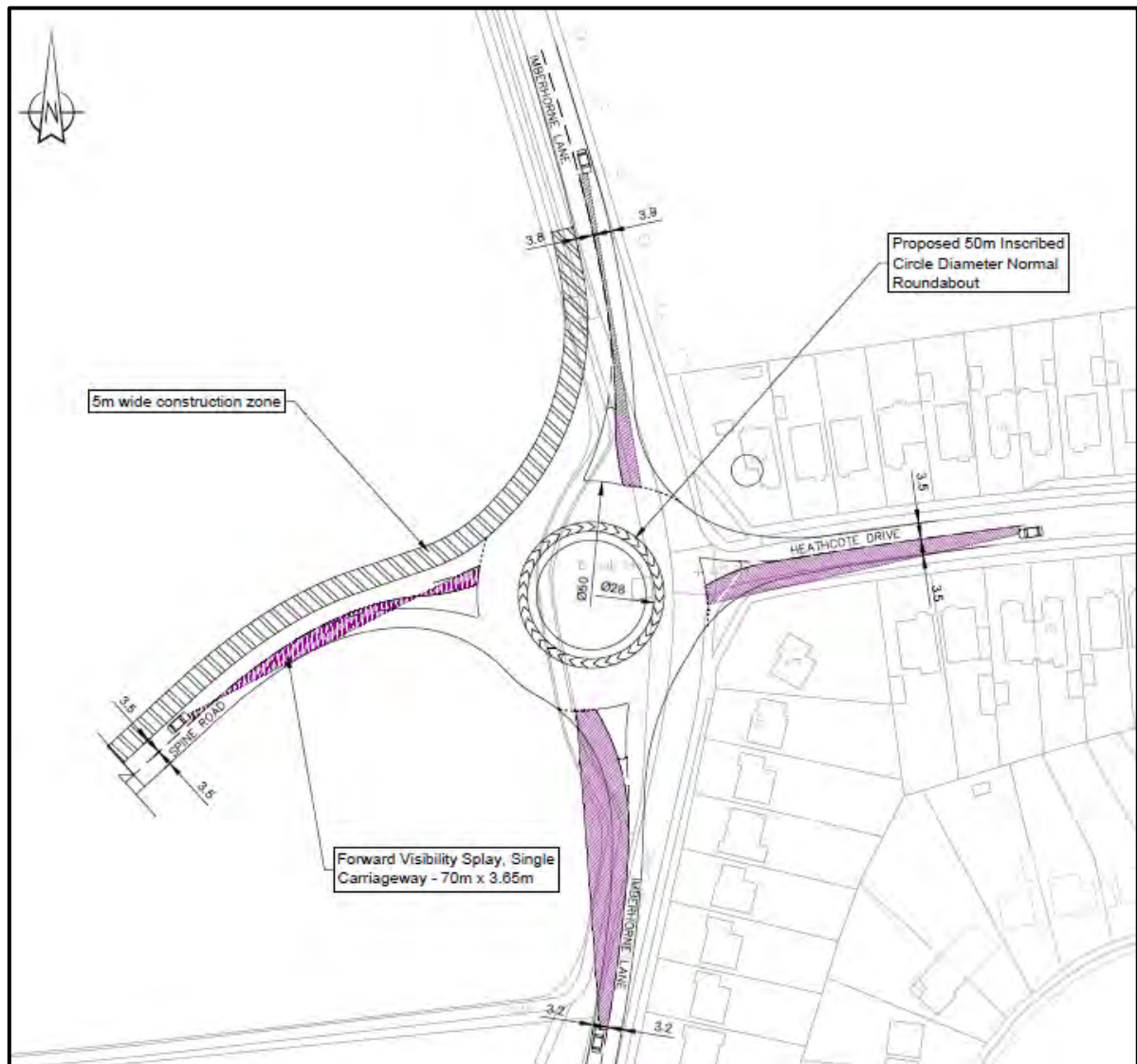
Source: Pell Frischmann 2020

- 3.4 Pedestrian crossings would be provided across all arms of the junctions to ensure the safe movement of pedestrians to and from the development, particularly given the proximity to Imberhorne Secondary School.

## Option 2 – Roundabout Junction

- 3.5 A second option considered is to provide a four arm, 50m ICD roundabout. The roundabout has been designed with 7m carriageways on the western and eastern arm, a 6.4m carriageway width on the southern arm (Imberhorne Lane) tying into the existing carriageway width and widening to 7.7m to the north. The junction layout is shown within **Figure 3.2** and the technical drawing is included at **Appendix B**.

**Figure 3.2** Option 2 – Roundabout Junction



## Pedestrian, Cycle and Secondary Access

- 3.6 A second vehicular access will be located on the southern section of site frontage located immediately to the north of the Worth Way in the form of a standard priority junction. This will provide access to the Care Village element of the scheme as well as providing an emergency access for the wider development.
- 3.7 Pedestrian and cycle connections will be located across the site to ensure permeability is maximised between the development site and the surrounding area.



## 4 Development Impact

### Introduction

- 4.1 In accordance with the details of the draft policy pertaining to the proposed development it is also necessary to consider the impact of the proposal on the operation of the existing highway network to identify where additional impacts remain. As such it is necessary to undertake a series of traffic modelling assessments to identify such impact and consider where contributions could be directed towards providing any necessary improvements.
- 4.2 The Mid Sussex Transport Study (MSTS) has considered the impact of all proposed developments identified within the Site Allocations DPD on a district wide basis. In addition to this it is necessary to consider the impact of the proposed development at Imberhorne Farm at a more local level and as such this also requires traffic modelling to be undertaken at the key junctions in the vicinity of the site, and the operation of the A222/A264 corridor.

### Mid Sussex Transport Study

- 4.3 The potential impact of proposed development identified within the Site Allocations DPD is considered within the Mid Sussex Transport Study (MSTS) which has been produced by Systra on behalf of MSDC. This assessed the impact of development using a district-wide strategic traffic model and comprised the following assessments:
- 2017 Base Year Highway Model Production and Validation
  - 2031 Reference Case Scenario;
  - 2031 Development Scenarios including MSDC local plan developments;
  - 2031 Preferred Development Scenarios including potential mitigation schemes
- 4.4 The 2017 Base Year Highway Model was validated in line with DfT's WebTag criteria and is therefore considered fit for purpose to assess the impact of developments identified within the Local Plan.
- 4.5 The modelling considered a range of different assessment scenarios, and the full details of the scenarios and results are included within the MSDC Site Allocations DPD evidence library, however it is understood that the proposed development is included within each of the 8 assessment scenarios considered.
- 4.6 In considering the impact of the proposed development, and indeed the impact of all development identified within the Site Allocations DPD, it is pertinent to reference the content of the Transport Assessment: Non-Technical Summary included within the MSDC Site Allocations DPD evidence library. This document summarises the impact of the developments considered within Scenarios 7 and 8 against the 2031 reference case.

### Scenarios 7 and 8

- 4.7 The modelling shows that in the Scenarios 7 and 8 without Mitigation, an impact which could be classed as 'severe' is forecast at eight junctions, with a further junction in Scenario 7 only. The list of junctions is detailed in para. 1.3.6 of the Non-Technical Summary document. From this list of junctions, it is noted that none of these are located within East Grinstead and as such are not likely to be impacted by a significant number of trips generated by the proposed development at Imberhorne Lane.
- 4.8 The MSTS also includes modelling for Scenarios 7 and 8 with Mitigation and therefore it is important to consider the impact on development in the district in this context. The list of junctions where highway mitigation is proposed is detailed within para. 1.4.3 and again does not include any junctions in East Grinstead.

- 4.9 The results of the modelling assessment for Scenarios 7 and 8 with Mitigation shows two 'severely' impacted junctions, which are located on the A23 and A272 north-east of Burgess Hill, and are therefore unlikely to be materially affected by the proposed development at Imberhorne Lane.

### A264/A22

- 4.10 The only detailed reference to the proposed development at Imberhorne Lane and indeed potential impact around East Grinstead within the Non-Technical Summary document is outlined within paras. 1.6.7 to 1.6.11.
- 4.11 The report acknowledges that the A264 / A22 junction is forecast to operate over capacity in the 2031 Reference Case and that the level of traffic passing through the junction in Scenarios 7 and 8 is shown to slightly increase. The model also shows that as a result of the queueing at the junction, there is some level of traffic re-routing to avoid using this junction and more specifically a proportion of this traffic would be made up of trips to the development on Imberhorne Lane from the west.
- 4.12 The report considers that the alternative routes within the network (namely the B2010 and B2028) are viable, and as such the impact of the development, and indeed wider development identified within the Local Plan is not considered to be severe.

### Additional traffic modelling

- 4.13 In addition to the modelling contained within the MSTs, a series of traffic modelling assessments have been undertaken by Pell Frischmann, of key junctions and links within the vicinity of the site, to understand both the existing local traffic situation and enable the evaluation of the impact of the proposed development on the operation of the surrounding highway network.
- 4.14 These assessments comprised both stand-alone junction assessments to consider the impact on key junctions, and a microsimulation assessment (using VISSIM) to consider the impact of the proposed development on the overall performance of the network.
- 4.15 There has been continued engagement with WSCC throughout this process to ensure that the parameters of the assessment in terms of future scenarios, committed development, traffic growth and technical details of the model were agreed in advance of the assessments being undertaken.
- 4.16 The traffic modelling adopted a two-stage approach with the first stage using LINSIG to consider the impact of the proposed development on the operation of key junctions in isolation and enable potential improvement schemes to be developed.
- 4.17 The second stage of modelling was undertaken which sought to evaluate the impact of the improvement schemes on the operation of the wider network as a whole using VISSIM. This measured in terms of journey times across the network and most significantly on the A22 corridor, with the implementation of the potential improvement schemes.
- 4.18 The potential improvement schemes would provide a strategic benefit to the highway network (and in particular the operation of the A22), and not simply to mitigate the impact of the proposed development at Imberhorne Farm. This approach has been discussed and agreed with WSCC and is considered to be the most appropriate solution to accommodate expected traffic growth and facilitate the wider growth of East Grinstead.

### Results

- 4.19 The results of this modelling clearly demonstrate that with the introduction of strategic improvement schemes a significant betterment in terms of journey times across the network in the future proposed scenario in both the AM and PM peak hours, when compared to the future base scenario. On this basis the potential improvement schemes would not only mitigate the impact of the proposed development at Imberhorne Farm but would also provide strategic benefit to the overall operation of the A22 corridor.

- 4.20 It is acknowledged that the potential strategic improvement schemes at the key junctions on the A22 corridor will need to be refined following ongoing discussions with WSCC, however it is accepted that the potential to provide such schemes exists, and that in accordance with the draft policy the proposed development at Imberhorne Farm could contribute towards their delivery.
- 4.21 In summary, the results of our modelling supports the findings of the MSTs.

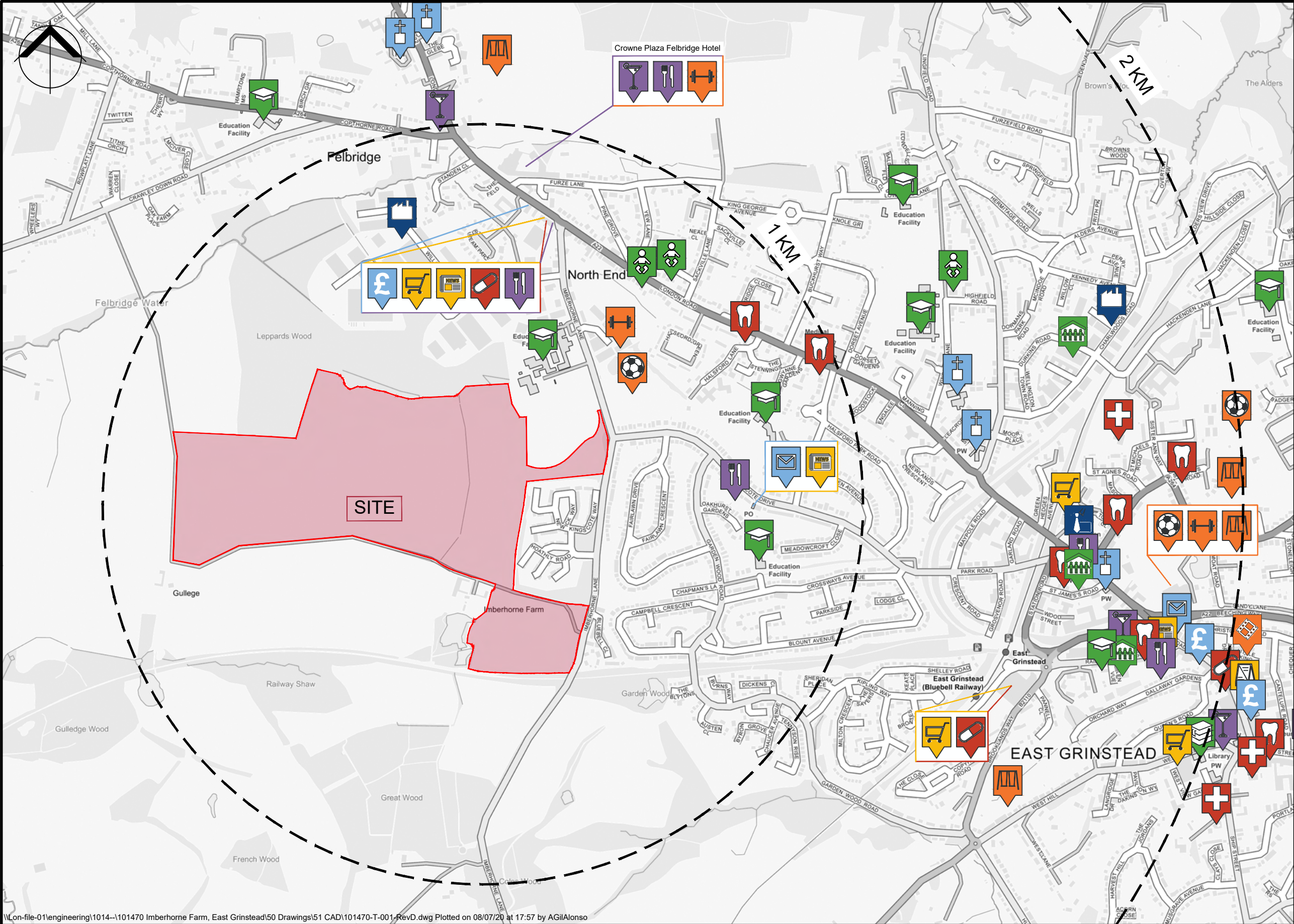


## 5 Summary and Conclusions

- 5.1 Pell Frischmann (PF) is commissioned by Welbeck Strategic Land II LLP (the 'Applicant'), to provide transport planning and highways consultancy services, in connection with the proposed redevelopment of land at Imberhorne Farm, East Grinstead (the 'site'). The Local Planning Authority (LPA) is Mid Sussex District Council (MSDC), and the Local Highways Authority (LHA) is West Sussex County Council (WSCC).
- 5.2 This Transport Appraisal has been prepared to summarise the findings of the transport studies undertaken to date support the development of the site to provide in the region of 550 residential dwellings (use class: C3) alongside appropriate access and infrastructure.
- 5.3 The Site is currently allocated within the Mid Sussex Draft Site Allocations DPD (March 2020) as "*Land South and West of Imberhorne Upper School*", policy reference "SA20". The transport objectives of the draft allocation set out a requirement to provide a sustainable Transport Strategy, mitigate development impacts by maximising sustainable transport enhancements, contribute towards capacity and safety improvements to junctions along the A22/A264 corridor, provide vehicular access on Imberhorne Lane and positively integrate the PRow which cross the site, including providing an access link into the Worth Way cycle/pedestrian path. The Site is well located to take advantage of a number of local services including schools, retail, employment and health services in the immediate vicinity of the site and is a less than 1.5km from East Grinstead town centre where further retail, leisure and employment facilities are available. There are also bus stops in the immediate vicinity of the site and East Grinstead Railway Station is located approximately 1.3km east of the site. The site is also well connected to the surrounding area by a network of walking and cycling routes.
- 5.4 A detailed sustainable transport strategy will form an integral part of the Transport Assessment which will be produced at the planning application stage to support the development. This will include details of improvements and enhancements to sustainable transport infrastructure and how sustainable travel will be promoted from the outset of the scheme through the introduction of a detailed and robust Travel Plan.
- 5.5 Access will be provided from Imberhorne Lane at the location of the existing Heathcote Drive junction and will be in the form of either a traffic signal-controlled junction or roundabout.
- 5.6 The Mid Sussex Transport Study undertaken to inform the Mid Sussex Site Allocations DPD process, concluded that the impact of developments included within the document (which includes the proposed development) would not result in a severe impact on the highway network within and around East Grinstead. Additional traffic model of the local network in the vicinity of the site which has been done with full consultation with WSCC, has demonstrated that the implementation of strategic improvements schemes at the key junctions on the A22 / A264 corridor would result in a betterment to the performance of the overall network even with the traffic associated with the development at Imberhorne Farm.

## Appendix A

### LOCAL AMENITIES PLAN



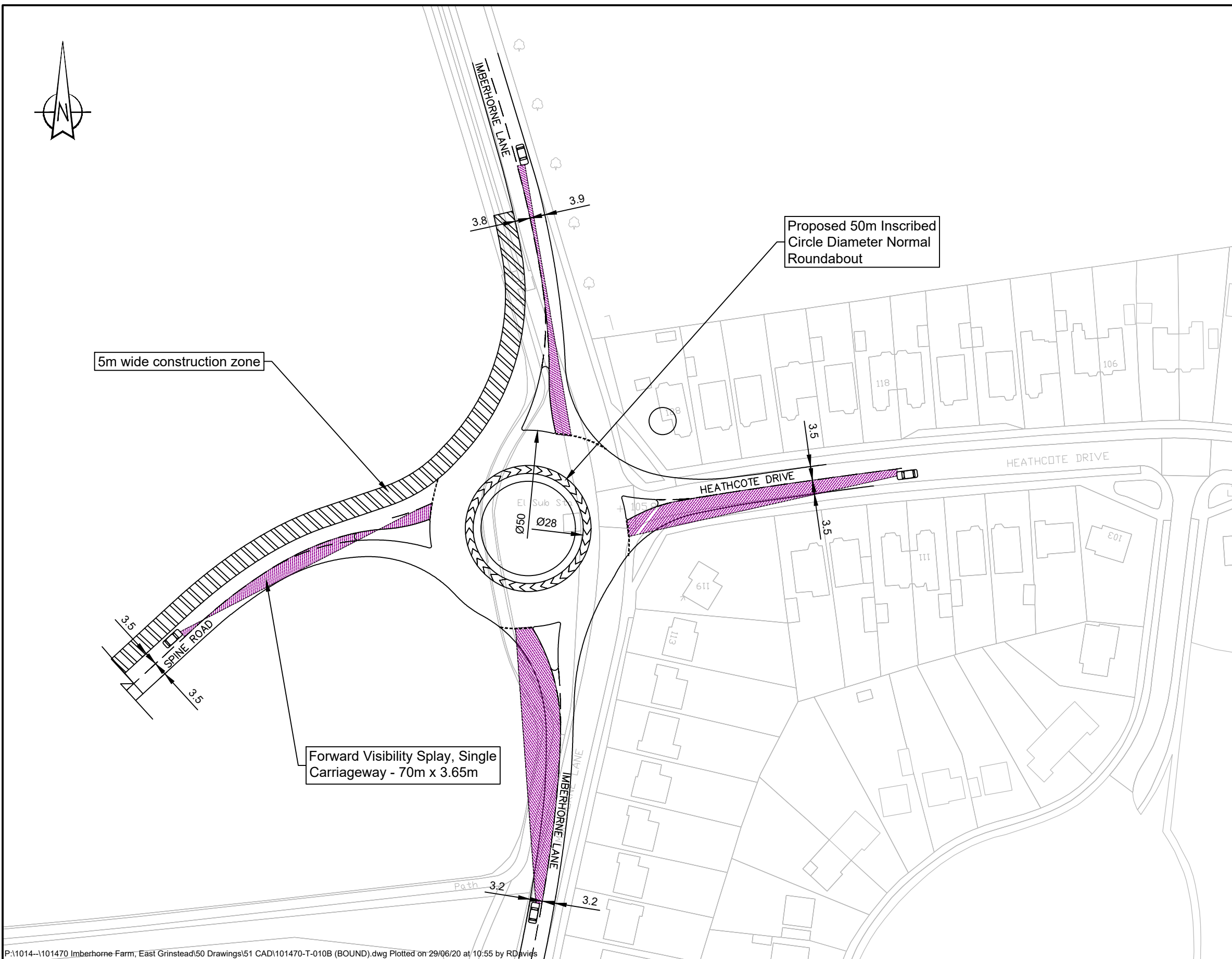
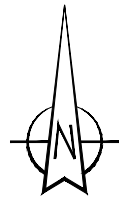
- KEY:**
- Pharmacy
  - Doctors/Hospital
  - Dentist
  - Shopping Area
  - Supermarket
  - Newsagents
  - Restaurant/Cafe/Takeaway
  - Pub/Bar
  - Recreational Area
  - Leisure Centre
  - Park
  - Cinema
  - Bank / ATM
  - Post Office
  - Place of Worship
  - Education
  - Library
  - Community Centre
  - Nursery
  - Employment
  - Industrial Estate

<div>Pell Frischmann</div> <div>5 MANCHESTER SQUARE LONDON W1U 3PD</div> <div>Telephone +44 (0)20 7486 3661</div> <div>Email: pflondon@pellfrischmann.com</div> <div>www.pellfrischmann.com</div>	Project	Imberhorne Farm, East Grinstead			Name	Date	Scale 1:10.000 @ A3	
	Drawing Title	Local Amenities Plan	Drawn	AGA	08/07/20	File No. 101470-T-001-RevD.dwg		
			Designed	AGA	08/07/20	Drawing Status		
			Checked	JO	08/07/20			
			Approved	PC	08/07/20			
			Drawing No.			101470-T-001		Revision D



## Appendix B

### INDICATIVE ACCESS DRAWINGS



**NOTES:**

**GENERAL**

1. Do not scale from drawing.
2. All dimensions are in meters, unless stated otherwise.
3. This drawing to be read & printed in colour.
4. This drawing to be read in conjunction with other contract drawings.
5. Where the contractor undertakes or engages a third party to undertake temporary works design, or varies the Pell Frischmann design in any way, then the contractor will take full responsibility and liability for all design aspects, including a design risk assessment. the contractor shall inform Pell Frischmann of any proposed variances to the design.
6. This drawing shall be read in conjunction with all other electrical, mechanical, public health & architectural drawings & the specification.

**DESIGN CRITERIA:**

**Design Speed: 30mph (50kph)**

**Stop Sight Distance - Table 3 TD 9/93**

- Desirable Minimum - 70m

**Horizontal Curvature - Table 3 TD 9/93**

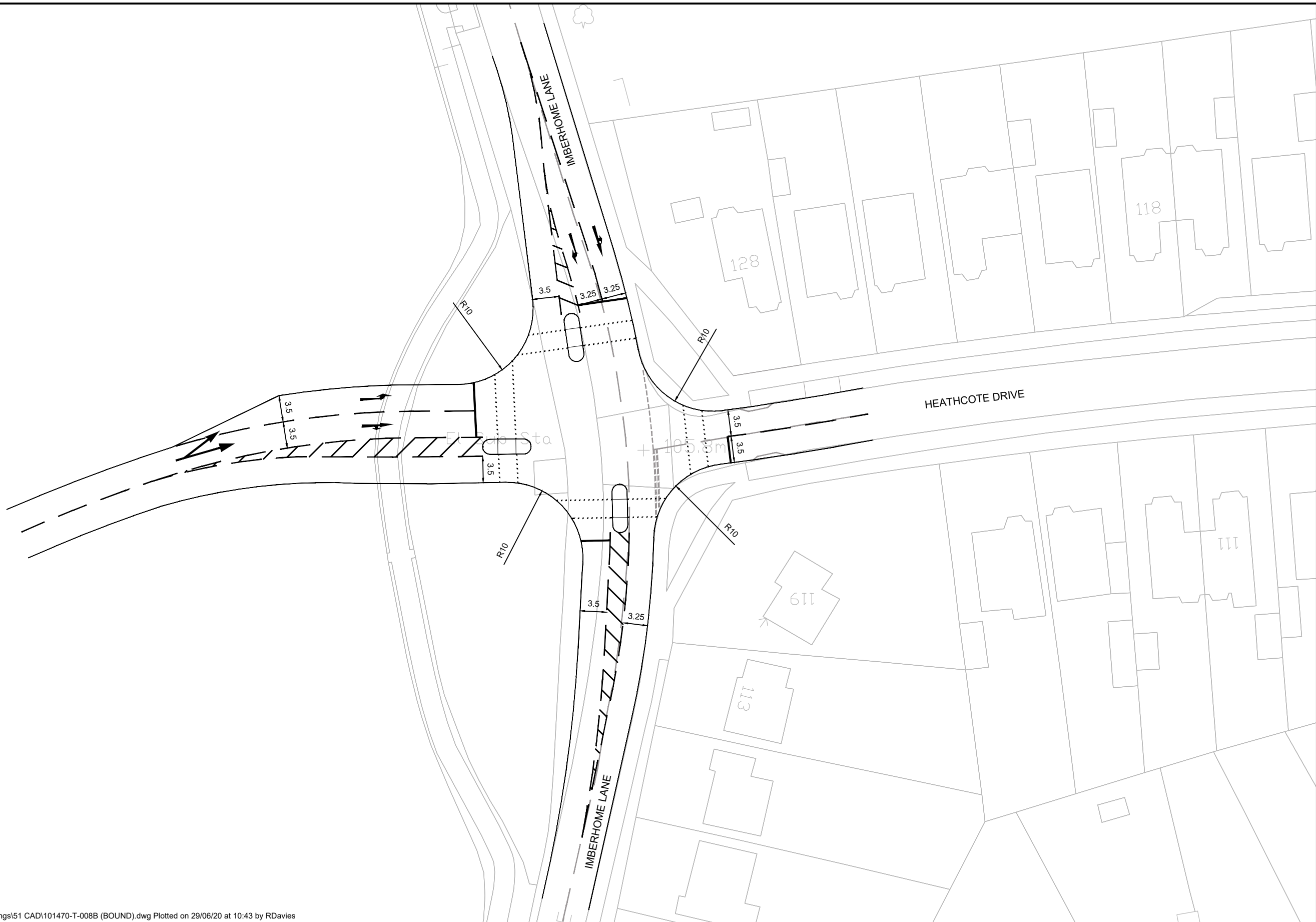
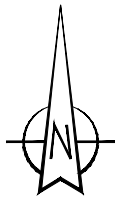
- Minimum 520m radius without elimination of adverse camber and transitions
- Minimum 360m radius with superelevation of 2.5%
- Minimum 255m radius with superelevation of 3.5%
- Minimum 180m radius with superelevation of 5%
- Minimum 127m One Step below with superelevation of 7%
- Minimum 90m Two Steps below with superelevation of 7%

**Roundabout Geometry - TD 16/07**

- Forward Visibility Splay, Single Carriageway - 70m x 3.65m

P:\1014--\101470 Imberhorne Farm, East Grinstead\50 Drawings\51 CAD\101470-T-010B (BOUND).dwg Plotted on 29/06/20 at 10:55 by RD\evs

<div><div>Pell Frischmann</div><div>5 MANCHESTER SQUARE LONDON W1U 3PD</div><div>Telephone +44 (0)20 7486 3661</div><div>Email: pflondon@pellfrischmann.com</div><div>www.pellfrischmann.com</div></div>	Project		Imberhorne Farm, East Grinstead		Drawn	KM	09/05/18	Scale		1:1000 @ A3	
	Drawing Title		Heathcote Drive - Roundabout Option With Construction Zone		Designed	KM	09/05/18	File No.		101470-T-010B (BOUND).dwg	
					Checked	PC	09/05/18	Drawing Status		DRAFT	
					Approved	PC	09/05/18	Drawing No.		101470-T-010	
									Revision		B



P:\1014--\101470 Imberhome Farm, East Grinstead\50 Drawings\51 CAD\101470-T-008B (BOUND).dwg Plotted on 29/06/20 at 10:43 by RDavies

Pell Frischmann

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Project	Imberhorne Farm, East Grinstead		Name	Date	Scale 1:500 @ A3	
		Drawn	AGA	08/05/19	File No. 101470-T-008B (BOUND).dwg	
		Designed	AGA	08/05/19		
		Checked	PC	08/05/19	Drawing Status DRAFT	
		Approved	PC	08/05/19		
Drawing Title	Heathcote Drive - Signalised Junction Option	Drawing No.				Revision
		101470-T-008				B



Land West of Imberhorne Lane, East Grinstead  
Heritage Statement  
June 2020

Land West of Imberhorne Lane, East Grinstead  
Heritage Statement  
June 2020

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**Report**

Heritage Statement

**Site**

Land West of Imberhorne Lane  
East Grinstead

**Client**

Welbeck Strategic Land

**Planning Authority**

Mid-Sussex District Council

**Grid reference**

TQ 37198 38672

**Prepared By**

Jan Mathieson BA(Hons) BArch ARB RIBA AABC

**Reviewed By**

Rob Bourn BA MA MCIfA

**Report Status**

Approved

**Date**

29/06/2020

**Orion Ref**

PN1099/HS/1



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- 2.0 Planning Background and Development Plan Framework
- 3.0 Historical Context and Location of Heritage Assets
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- 5.0 Summary and Conclusions

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## Executive Summary

This heritage statement considers land at Imberhorne Farm, East Grinstead (the Study Site) and the potential impact of the proposed development upon the significance of those designated and non-designated heritage assets located in its vicinity, together with impact upon the significance of the heritage assets by development within their setting.

In accordance with Paragraph 189 of the *National Planning Policy Framework* (NPPF 2018) and Local Plan policies this report first identifies and describes the historical development of the subject site and outlines the significance of the designated and non-designated heritage assets before going on to consider the impact of the proposal on that significance.

There are no designated heritage assets within the redline of the site. There are a number of listed buildings located in the vicinity of the site. Those in closest proximity, which have the potential to be impacted by the proposals, are Imberhorne Farmhouse (grade II), 1 - 3 Imberhorne Farm Cottages (grade II\*) and Gullede Farmhouse (grade II\*). This is as a result of the buildings being good examples of their type and of the connections with the Manor of Imberhorne. In particular, remnants of the Medieval building are set within the fabric of 1 – 3 Imberhorne Farm Cottages.

The significance of all heritage assets was assessed, by considering the archaeological, artistic, architectural and historic values. It was found that these values were not harmed by the proposals. The setting of each building was then considered, to determine if the significance of the heritage assets was impacted by development within their setting. It was found that there was no impact due to co-visibility as a result of distance and screening. It was, however, considered that the non-visual attributes of purpose, economy and function were impacted by the loss of the agricultural fields which were once associated with the heritage assets. However, as this was only part of their significance, it was assessed to cause a low level of less than substantial harm to the heritage assets. It was therefore concluded that the proposals comply with the relevant heritage paragraphs contained in Section 16 of the NPPF 2018 and relevant local heritage policy.

## 1.0 Introduction

- 1.1 This heritage statement considers Land West of Imberhorne Lane, East Grinstead (Figure 1). The site (hereinafter referred to as the “Study Site”) is located at grid reference TQ 37198 38672.
- 1.2 In accordance with the Paragraph 189 of the *National Planning Policy Framework* (NPPF 2018) and the requirement for applicants to describe the significance of heritage assets including contribution to setting, the report draws together available information on designated and non-designated heritage assets.
- 1.3 The assessment includes the results of a site inspection, an examination of published and unpublished records, charts historic land-use through a map regression exercise and considers relevant national and local policy and guidance.
- 1.4 The Historic Environment Record and Historic England Schedule of Listed Buildings has been consulted (online) and the relevant designated and non-designated heritage assets located in the immediate vicinity are identified in Figure 2.
- 1.5 A site visit was undertaken in November 2019 when the conditions were overcast but visibility was good. However, no access was possible either inside the heritage assets but, as the nature of the issues are likely to be related primarily to setting, this was not considered to affect the assessment.
- 1.6 The development is residential, located as indicated in Figure 11. Features include enhancement of facilities at an existing school located on site, play areas, allotments, a care community and local centre.
- 1.7 Land west of Imberhorne Lane is allocated at Policy SA 20 of the emerging Mid Sussex Site Allocations DPD (Regulation 19) for c550 dwellings, care village (use class C2), local centre, 2FE primary school (and early years provision), strategic SANG, playing fields for Imberhorne Secondary School and associated open space.
- 1.8 There has been a number of iterations of the masterplan for the scheme in the last 3 years, all of which have taken the heritage issues for the site into account. During this time the heritage aspects of the scheme have been a core design issue. Consultations with the Mid-Sussex Conservation Officer and with the Historic England Inspector of Historic Buildings and Areas and their comments and observations have been taken into account in following iterations of the scheme to remove or significantly reduce the potential impact on significance of designated heritage assets and leading to the layout as shown in Figure 11. It is this last iteration of the masterplan that this document assesses. This masterplan includes various previous inbuilt design measures to reduce the effect on designated heritage assets.

### Location and Description

- 1.9 The Study Site is located at Imberhorne Farm, Imberhorne Lane, East Grinstead. The land-use in the wider area was historically agricultural land (Figures 3 - 6), but this has slowly been replaced to the north and east by housing and ancillary service buildings, with an industrial-type complex immediately to the north east. Fields and wooded areas act as buffers between the Study Site and these zones.
- 1.10 To the east lies East Grinstead, its western boundary running along the east side of Imberhorne Lane to the east of the site. This development takes the form of detached or semi-detached low-rise residences constructed at various times during the mid- to late- 20<sup>th</sup> century.



- 1.11 This style of development continues in the area of Felbridge around to the north, although development density is lower. The nearest road to the north of the Study Site is Crawley Down Road which then turns south to become the nearest road to the west of the site, where it is then named Hophurst Hill. The nearest road to the east of the site is Imberhorne Lane with London Road running diagonally to the north-east.
- 1.12 The Birches Industrial Estate to the north-east (which replaced part of a wood of the same name) includes several technical and construction suppliers. It comprises large industrial-style structures and associated car parks, the largest building being, apart from the designated heritage assets, the closest built form in proximity to the Study Site.
- 1.13 Either wooded or grassed areas act as buffer zones between the Study Site and these later developments. Wooded or grassed areas are also located to the south and west with built development some further way off.
- 1.14 There are three designated heritage assets which are in sufficient proximity to, but not on, the site to have the potential for the development to impact their significance. This includes impact to this significance by development in their setting. There are no other heritage assets, either designated or non-designated, in close proximity, nor is the Study Site within a conservation area, the nearest one being in East Grinstead at some distance to the east.
- 1.15 This report considers impact of development on the Study Site on the significance of heritage assets at Imberhorne Farmhouse, Imberhorne Farm Cottages and Gulledge Farm.

## 2.0 Planning Background and Development Plan Framework

### Planning (Listed Building and Conservation Areas) Act 1990

- 2.1 The *Planning (Listed Building and Conservation Areas) Act 1990* sets out broad policies and obligations relevant to the protection of Listed Buildings and Conservation Areas and their settings.
- 2.2 Section 66(1) states:
- In considering whether to grant planning permission for development which affects a listed building or its setting, the local planning authority or, as the case may be, the Secretary of State shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.*
- 2.3 Section 69 of the Act requires local authorities to define as conservation areas any *areas of special architectural or historic interest the character or appearance of which it is desirable to preserve or enhance* and Section 72 gives local authorities a general duty to pay special attention *to the desirability of preserving or enhancing the character or appearance of that area* in exercising their planning functions. These duties are taken to apply only within a Conservation Area. The Act does not make specific provision with regard to the setting of a Conservation Area, that is provided by the policy framework outlined below.

### National Planning Policy Framework (NPPF) and National Planning Practice Guidance (NPPG)

- 2.4 Government policy in relation to the historic environment is outlined in Section 16 of the *National Planning Policy Framework 2018* (NPPF), entitled *Conserving and Enhancing the Historic Environment*. This provides guidance for planning authorities, property owners, developers and others on the conservation and investigation of heritage assets. Overall, the objectives of Section 16 of the NPPF can be summarised as seeking the:
- Delivery of sustainable development;
  - understanding the wider social, cultural, economic and environmental benefits brought by the conservation of the historic environment;
  - conservation of England's heritage assets in a manner appropriate to their significance; and
  - recognition of the contribution that heritage assets make to our knowledge and understanding of the past.
- 2.5 Section 16 of the NPPF recognises that intelligently managed change may sometimes be necessary if heritage assets are to be maintained for the long term.
- 2.6 Paragraph 189 states that planning decisions should be based on the significance of the heritage asset, and that the level of detail supplied by an applicant should be proportionate to the importance of the asset, and should be no more than sufficient to understand the potential impact of the proposal upon the significance of that asset.
- 2.7 *Heritage Assets* are defined in Annex 2 as a building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest. Heritage assets include designated heritage assets and assets identified by the local planning authority (including local listing).

- 2.8 *Designated Heritage Assets* comprise: World Heritage Sites, Scheduled Monuments, Listed Buildings, Protected Wreck Sites, Registered Parks and Gardens, Registered Battlefields and Conservation Areas.
- 2.9 *Significance* is defined as: the value of a heritage asset to this and future generations because of its heritage interest. This interest may be archaeological, architectural, artistic or historic. Significance derives not only from a heritage asset's physical presence, but also from its setting.
- 2.10 *Setting* is defined as: the surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance or may be neutral.
- 2.11 The NPPF is supported by the *National Planning Policy Guidance* (NPPG). In relation to the historic environment, paragraph 18a-001 states that:
- Protecting and enhancing the historic environment is an important component of the National Planning Policy Framework's drive to achieve sustainable development (as defined in Paragraphs 6-10). The appropriate conservation of heritage assets forms one of the 'Core Planning Principles'.*
- 2.12 Paragraph 18a-002 makes a clear statement that any decisions relating to Listed Buildings and their settings and Conservation Areas must address the statutory considerations of the *Planning (Listed Buildings and Conservation Areas) Act 1990*, as well as satisfying the relevant policies within the National Planning Policy Framework and the Local Plan.
- 2.13 Paragraph 18a-013 outlines that the assessment of the impact of a proposed development on the setting of a heritage asset needs to take into account and be proportionate to the significance of the asset being considered, and the degree to which the proposed development enhances or detracts from the significance of the asset and the ability to appreciate the significance.
- 2.14 The NPPG outlines that although the extent and importance of setting is often expressed in visual terms, it can also be influenced by other factors such as noise, dust and vibration. Historic relationships between places can also be an important factor stressing ties between places that may have limited or no intervisibility with each other. This may be historic as well as aesthetic connections that contribute or enhance the significance of one or more of the heritage assets.
- 2.15 Paragraph 18a-013 concludes:
- The contribution that setting makes to the significance of the heritage asset does not depend on there being public rights or an ability to access or experience that setting. This will vary over time and according to circumstance. When assessing any application for development which may affect the setting of a heritage asset, local planning authorities may need to consider the implications of cumulative change. They may also need to consider the fact that developments which materially detract from the asset's significance may also damage its economic viability now, or in the future, thereby threatening its on-going conservation.*
- 2.16 The key test in NPPF paragraphs 193-196 is whether a proposed development will result in substantial harm or less than substantial harm. However, substantial harm is not defined in the NPPF. Paragraph 18a-017 of the NPPG provides additional guidance on substantial harm. It states:
- What matters in assessing if a proposal causes substantial harm is the impact on the significance of the heritage asset. As the National Planning Policy Framework*



*makes clear, significance derives not only from a heritage asset's physical presence, but also from its setting. Whether a proposal causes substantial harm will be a judgment for the decision taker, having regard to the circumstances of the case and the policy in the National Planning Policy Framework. In general terms, substantial harm is a high test, so it may not arise in many cases. For example, in determining whether works to a listed building constitute substantial harm, an important consideration would be whether the adverse impact seriously affects a key element of its special architectural or historic interest. It is the degree of harm to the asset's significance rather than the scale of the development that is to be assessed.*

- 2.17 Paragraph 196 of the NPPF outlines that where a proposed development results in less than substantial harm to the significance of a heritage asset, the harm arising should be weighed against the public benefits accruing from the proposed development. Paragraph 18a-020 of the NPPG outlines what is meant by public benefits:

*Public benefits may follow from many developments and could be anything that delivers economic, social or environmental progress as described in the National Planning Policy Framework (Paragraph 7). Public benefits should flow from the proposed development. They should be of a nature or scale to be of benefit to the public at large and should not just be a private benefit. However, benefits do not always have to be visible or accessible to the public in order to be genuine public benefits.*

- 2.18 Paragraph 197 states:

*the effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that affect directly or indirectly non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.*

### Local Planning Policy

- 2.19 *The Mid Sussex District Plan 2014 – 2031, Adopted March 2018* is the relevant local plan and *DP34: Listed Buildings and Other Heritage Assets* is the section which sets out the requirements in relation to Listed Buildings.

- 2.20 The *Strategic Objectives* are;

- *To promote well located and designed development that reflects the District's distinctive towns and villages, retains their separate identity and character and prevents coalescence*
- *To protect valued characteristics of the built environment for their historical and visual qualities; and*
- *To support and enhance the attractiveness of Mid Sussex as a visitor destination.*

- 2.21 The *Evidence Base* is the *West Sussex Historic Environment Record; Register of Listed Buildings*.

- 2.22 In connection with Listed Buildings, the policy states that 'Development will be required to protect listed buildings and their settings. This will be achieved by ensuring that:
- *A thorough understanding of the significance of the listed building and its setting has been demonstrated. This will be proportionate to the importance of the building and potential impact of the proposal;*
  - *Alterations or extensions to a listed building respect its historic form, scale, setting,*

*significance and fabric. Proposals for the conversion or change of use of a listed building retain its significance and character whilst ensuring that the building remains in a viable use;*

- *Traditional building materials and construction techniques are normally used. The installation of uPVC windows and doors will not be acceptable;*
- *Satellite antennae, solar panels or other renewable energy installations are not sited in a prominent location, and where possible within the curtilage rather than on the building itself; Special regard is given to protecting the setting of a listed building;*
- *Where the historic fabric of a building may be affected by alterations or other proposals, the applicant is expected to fund the recording or exploratory opening up of historic fabric.*

- 2.23 The Plan further notes that *'The Council will seek to conserve heritage assets in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the character and quality of life of the District. Significance can be defined as the special interest of a heritage asset, which may be archaeological, architectural, artistic or historic. Proposals affecting such heritage assets will be considered in accordance with the policies in the National Planning Policy Framework (NPPF) and current Government guidance'.*

#### Other Guidance

*Historic Environment Good Practice Advice In Planning Note 2: Managing Significance in Decision-Taking in the Historic Environment (Historic England 2015)*

- 2.24 The purpose of this document is to provide information to assist local authorities, planning and other consultants, owners, applicants and other interested parties in implementing historic environment policy in the NPPF and NPPG. It outlines a six-stage process to the assembly and analysis of relevant information relating to heritage assets potentially affected by a proposed development:
- Understand the significance of the affected assets;
  - Understand the impact of the proposal on that significance;
  - Avoid, minimise and mitigate impact in a way that meets the objectives of the NPPF;
  - Look for opportunities to better reveal or enhance significance;
  - Justify any harmful impacts in terms of the sustainable development objective of conserving significance and the need for change; and
  - Offset negative impacts on aspects of significance by enhancing others through recording, disseminating and archiving archaeological and historical interest of the important elements of the heritage assets affected.

*Historic Environment Good Practice Advice In Planning Note 3: The Setting of Heritage Assets (Historic England 2017)*

- 2.25 Historic England's Historic Environment Good Practice Advice in Planning Note 3 provides guidance on the management of change within the setting of heritage assets.
- 2.26 The document restates the definition of setting as outlined in Annex 2 of the NPPF. Setting is also described as being a separate term to curtilage, character and context; while it is largely a visual term, setting, and thus the way in which an asset is experienced, can also be affected by noise, vibration, odour and other factors. The document makes it clear that setting is not a heritage asset, nor is it a heritage designation, though land within a setting may itself be designated. Its importance lies in what the setting contributes to the significance of a heritage asset.

- 2.27 The Good Practice Advice Note sets out a five-stage process for assessing the implications of proposed developments on setting:
1. Identification of heritage assets which are likely to be affected by proposals;
  2. Assessment of whether and what contribution the setting makes to the significance of a heritage asset;
  3. Assessing the effects of proposed development on the significance of a heritage asset;
  4. Maximising enhancement and reduction of harm on the setting of heritage assets; and
  5. Making and documenting the decision and monitoring outcomes
- 2.28 The guidance reiterates the NPPF in stating that where developments affecting the setting of heritage assets results in a level of harm to significance, this harm, whether substantial or less than substantial, should be weighed against the public benefits of the scheme.

Historic England 2019 *Statement of Heritage Significance: Analysing Significance in Heritage Assets* Historic England Advice Note 12.

- 2.29 The purpose of this guidance is ‘to provide information on the analysis and assessment of heritage significance in line with the National Planning Policy Framework (NPPF) to assist owners, applicants, local planning authorities (LPAs), planning and other consultants, and other interested parties in implementing historic environment legislation, the policy in the NPPF and the related guidance given in the Planning Practice Guidance (PPG)’.
- 2.30 It sets out the principles of significance as ‘Significance is one of the guiding principles running through the historic environment section of the NPPF. The NPPF defines significance as ‘the value of a heritage asset to this and future generations because of its heritage interest’.
- 2.31 Section 2 defines the categories under which significance ought to be assessed thus ‘Such interest may be archaeological, architectural, artistic or historic’ and it may derive ‘not only from a heritage asset’s physical presence, but also from its setting’ Significance is what conservation sustains, and where appropriate enhances, in managing change to heritage assets’.
- 2.32 **Archaeological interest;** *There will be archaeological interest in a heritage asset if it holds, or potentially holds, evidence of past human activity worthy of expert investigation at some point.*
- 2.33 **Architectural and artistic interest;** *These are interests in the design and general aesthetics of a place. They can arise from conscious design or fortuitously from the way the heritage asset has evolved.*
- 2.34 *More specifically, **architectural interest** is an interest in the art or science of the design, construction, craftsmanship and decoration of buildings and structures of all types. Artistic interest is an interest in other human creative skills, like sculpture.*
- 2.35 **Historic Interest;** An interest in past lives and events (including pre-historic). Heritage assets can illustrate or be associated with them. Heritage assets with historic interest not only provide a material record of our nation’s history but can also provide meaning for communities derived from their collective experience of a place and can symbolise wider values such as faith and cultural identity. Having described the various interests, assess the level of the general significance of the heritage asset and the particular contribution to that significance of any features



which would be affected by the proposal, or of its setting if it, too, is affected by the proposal.

- 2.36 Section 3 further notes in particular relation to **setting** that '*Where the proposal affects the setting, and related views, of a heritage asset, or assets, clarify the contribution of the setting to the significance of the asset, or the way that the setting allows the significance to be appreciated. This may include the impact of the location of new development within the setting, of the impact on key views, the impact on the relationship of the heritage asset to its setting, etc.*'.

### 3.0 Historical Context and Location of Heritage Assets

#### Introduction

- 3.1 The following section presents a historical development of the site and wider area through the results of a map regression exercise and review of relevant background documentation.
- 3.2 The location of designated heritage assets surrounding the site are also discussed below; these are shown on Figure 2. There are no heritage assets on the Study Site itself.

#### Historical Background

##### The Local Area

- 3.3 The Study Site sits in an area which was primarily rural, witnessed by the fact that the name of East Grinstead, the nearest sizeable settlement to the Study Site, which meant 'green place'. It was originally a Saxon village which, by the time of the Domesday Book in 1086 had grown to be a significant settlement for the period.
- 3.4 By the 13<sup>th</sup> century, East Grinstead was granted town status and, in 1247, the town was given a charter which conferred advantageous rights. These included the right to hold weekly markets together with an annual fair which, by 1516, had been increased to two fairs each year.
- 3.5 In medieval times, the population numbered just a few hundred, but East Grinstead was growing in status. The increased number of fairs brought in many people from the local area which enhanced its prosperity and from early in the 14<sup>th</sup> century to the mid-18<sup>th</sup> century, the town provided MPs to represent its interests.
- 3.6 An important feature in the development of East Grinstead was that it was on the main road from London to Lewes, which is the county town of Sussex. The journey from London to Lewes was too arduous to complete without a break, it was preferable to stop overnight, the most convenient place being East Grinstead.
- 3.7 By the mid-18<sup>th</sup> century, the popularity of Brighton as a seaside resort, being much enhanced by Royal patronage, significantly increased the number of stagecoaches passing through. Accordingly, the number of inns and other necessary services for the traveller, grew, thereby increasing prosperity. A small indicator of this prosperity is that the high street has the longest run of medieval timber buildings which have remained in continuous commercial use in the country.
- 3.8 The population of East Grinstead increased significantly during the early 19<sup>th</sup> century. By the end of the century it had reached 6,000. Improvements during the 19<sup>th</sup> century included its acquisition of a railway station, resulting in the end of stagecoach travel but allowing commuting to and from the town, as a result of which the population grew rapidly. Other benefits were gas light, sewers, piped water and a cemetery – all mundane but essential facilities required by a growing Victorian town of some quality. Following World War II, the council built more houses and many private houses were also developed.
- 3.9 Commercial and industrial facilities were enhanced in the 20<sup>th</sup> century. This development of the central area of East Grinstead is not within proximity of the Study Site. However, residential areas beyond wooded and grassed areas to the north and east, and a commercial and industrial zone to the north east, are the furthest outposts of East Grinstead's development.





- 3.16 Whilst there are no heritage assets on the Study Site, there are three designated heritage assets – Imberhorne Farm, Imberhorne Farm Cottages and Gulledge Farm, all in close proximity. There are no non-designated heritage assets in proximity and the East Grinstead Conservation Area is far enough to the east so as not to be impacted by the development. This section sets out only a brief history of the assets, the detail and significance of which is discussed further in Section 4.

*Imberhorne Farmhouse - Grade II*

- 3.17 Imberhorne Farmhouse is to the south-east corner of the Study Site and is Listed Grade II. It sits in a grouping with Imberhorne Farm Cottages, together with several other agricultural buildings including stables and storage facilities.
- 3.18 Imberhorne Farmhouse (Plate 2) is a Georgian brick-built house, dated to the early 19<sup>th</sup> century, which sits on a stone base and has a slate roof. It has substantial accommodation, including several bedrooms, entrance hall, sitting room, kitchen with larder, scullery, cellar, dairy and associated ancillary rooms.
- 3.19 In 1560, the estate was bought by Sir John Sackville in whose family it remained until 1872, although the Sackvilles are thought never to have resided there, their primary residence being at Knole. It is therefore likely that the farmhouse was constructed during their stewardship in 1820.
- 3.20 By 1955, all of the relevant heritage assets were in the stewardship of a single owner when the Emmett family bought the farms of Imberhorne and Gulledge.
- 3.21 The Farmhouse sits, as historic maps suggest it has always done, with a group of ancillary agricultural building to its west and south-west. This group appears to have evolved over time, but today comprises storage and farm buildings to the west, with Imberhorne Farm Cottages and agricultural buildings to the south-west.
- 3.22 Historic plan also suggest that the Farmhouse had orchards to the east, and possibly a kitchen garden to south. Mature trees, many of which possibly remain today, providing landscaped grounds in the immediate vicinity of the building.



Plate 2 Imberhorne Farmhouse North (front) elevation (archive photograph)

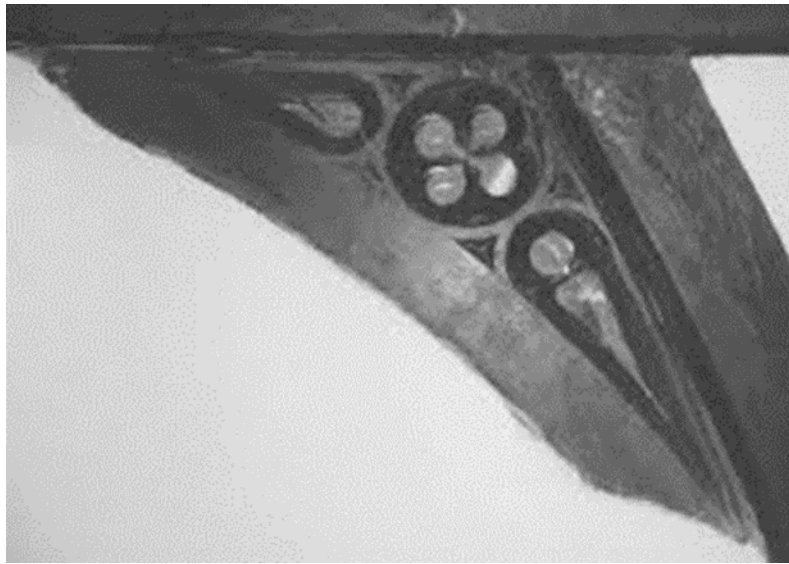
### 1 – 3 Imberhorne Farm Cottages Grade II\*

- 3.23 1–3 Imberhorne Farm Cottages appear to be, when viewed from the exterior, Victorian farm-workers' cottages (Plate 3). This outward impression masks the building's origins in the early 15th century, when the original building, over which the veneer of the cottages is laid, was part of The Manor House of Imberhorne.



Plate 3 Elevation of 1 – 3 Imberhorne Farm Cottages

- 3.24 It is likely that one of the primary reasons that the Manor of Imberhorne was located there was as a location to break the journey between London and Lewes as it is positioned on the main London Road, and appears to have been of considerable quality to impress visitors.
- 3.25 Within the external Victorian brick skin, lies the remnants an early arch-braced false hammer-beam roof of The Manor. Research (by others) could not provide a date of construction, but the timber has been tree-ring dated to 1428. The structure is compared to other surviving arch-braced examples. It is not dissimilar in structural concept to the design of Westminster Hall but lacks the latter's level of elaborate decoration (Plate 3).



**Plate 4** Imberhorne Farm Cottages - carved timber detail to roof structure (archive photo)

- 3.26** The structure of the building has been extensively researched, recorded and documented, such is its pre-eminence as an example of this type of timber construction. Historic England's Listing, together with several additional publications, have analysed the interior in detail. However, this Heritage Statement does not impact the interior so no detail concerning the interior entered into. Historic England's Listing in Appendix 1 gives further detail.

*Gulledge Farmhouse Grade II\**

- 3.27** Gulledge Farmhouse is situated at the end of the long lane and bridlepath, leading west from Imberhorne Lane and passing to the north of Imberhorne Farmhouse and Farm Cottages. The origins of the house lie in Tudor times, around 1550, when the building was first constructed as a timber framed property, remnants of which remain to the side (east and west) elevations (Plate 5).



**Plate 5** Front elevation to Gulledge (archive photograph)



- 3.28 The fact that the timber framing is closer than might be required for constructional purpose defines it as a house of some quality (Plate 6). It is certainly larger than most Wealden properties, which were generally noted for their small size. The chimney location indicates that the house was once T-shaped, possibly with a hall and a gallery. Later Horsham stone slabs are laid on the roof which is supported on heavy beams.
- 3.29 In 1609, a three-gabled Jacobean front with mullion windows replaced the earlier exterior (Plate 5). With the Tudor chimneys still in situ, this presents an imposing façade. However, it is clear that this was intended primarily to impress, as the façade does not extend around the side elevations and the interior was not upgraded, at that time, to this standard. The stone for the facade is thought to have been quarried locally, and the resulting excavations turned into a pond.
- 3.30 Records suggest that Richard Alfrey, MP for East Grinstead, lived at Gulledge in 1365. His descendant, Edward Alfrey, most likely added the stone facade and family crest in the 16th century. Mid-16<sup>th</sup> century wall paintings were uncovered during recent restoration.
- 3.31 A further extension was added to the rear (north) elevation, but this was of lesser quality, apparently being constructed from reused materials. However, it does not detract from the imposing façade; the agglomeration of materials and styles presents an interesting layering of the evolution of the building.
- 3.32 Historic maps suggest that the farm has invariably had a selection of ancillary buildings over time. As these will most likely have been not of the highest quality, they have not survived in their entirety and today, a range of buildings stands to the north-west of Gulledge farmhouse, with a wooded and planted area to the north-east.



Plate 6 Gulledge side (west) elevation illustrating remaining elements of earlier construction

## 4.0 Proposed Development and Potential Impact on Heritage Assets

### Background

- 4.1 This section identifies and assesses the impacts of the proposal on the significance of the heritage assets located within and in the vicinity of the subject site. In assessing the heritage impacts of the proposal, the relevant policies cited in section 2.0 have been referenced.

### The Proposed Development

- 4.2 The proposed development comprises residential units located on the Study Site (Figure 11). They include a Care Community, enhancements to an existing school, allotments, a local centre and play areas.

### Potential Impacts on Heritage Assets

- 4.3 As noted, there are no heritage assets on the Study Site, but there are three Listed Buildings located in the immediate vicinity. The proposed development, therefore, has the potential to impact on the significance of the heritage assets identified, together with the possibility of impacting their significance by development in their setting.
- 4.4 Imberhorne Farmhouse, Imberhorne Farm Cottages and Gulledge are not located on the Study Site, but all are located in such proximity so as to have the potential to be impacted by the development (Figure 2).
- 4.5 In order to understand how any new development could affect the significance of these heritage assets, it is important to understand the specific heritage values which combine to inform that significance. An understanding of the contribution setting makes to its significance is also considered.

#### *Imberhorne Farmhouse (Listed Grade II)*

- 4.6 Imberhorne Farmhouse is located to the south of the small lane leading west off Imberhorne Lane. Its front elevation faces north and it is positioned to the east side of the farm complex. The significance of Imberhorne Farmhouse is assessed thus;
- 4.7 **Archaeological value** may be low to medium. However, as the proposals do not include excavation on this site, there will be no harm to the archaeological significance.
- 4.8 **Artistic and Architectural Values** lie in the building's description in the Listing as a *'good example of well-built farmhouse of 1820'*. Whilst it is neither an unusual nor an outstanding building of its type, it is nonetheless a sound example of a farmhouse owned by a more prosperous landowner, constructed in local material and its artistic and architectural values are medium. The proposals do not involve alteration to the fabric of the building therefore do not affect this significance,
- 4.9 The **Historic Value** of Imberhorne Farmhouse is initially in its position as a prominent agricultural holding in the area since the early 19<sup>th</sup> century. This is elevated by its connection to the Manor of Imberhorne, and its construction on a prominent site, selected for its position on the main London to Lewes road. Its prosperity is likely to be related to that of the nearest town, East Grinstead, to the east. This connection results in the heritage Farmhouse therefore cause no harm to this aspect of its significance.
- 4.10 As the proposals involve development in the fields to the north and north-east of the Farmhouse, it has the potential to impact the significance by development in

the setting of Imberhorne Farmhouse. There are two aspects to the setting. One is the immediate environs of the building, the other is the wider setting, considering factors other than immediate proximity and historical connections.

- 4.11 The Farmhouse, as might be expected from a less agricultural building, is enclosed within a small area of landscaping, which includes many mature trees. It would have provided a small pleasant garden for enjoyment and a respite from the activities of the farm. This provides the immediate setting of the farmhouse and is not impacted by the proposals. Views from the building only have the potential to be impacted when looking north towards the primary school or, less obviously, north-west towards the residential development. These views are heavily screened by existing trees within the immediate setting, which is augmented by existing and proposed planting to the north and north-west. It is unlikely that anything other than small vignettes of the proposals will be visible through the trees.
- 4.12 The views looking towards the Farmhouse from the north (from the access path and bridleway), east (Imberhorne Lane is at some distance and unlikely to result in co-visibility) and west are not impacted by the development. There is potential impact looking from the south, south-west and south-east as the development is beyond the house, but Plate 7 illustrates the fact that the intervening ancillary buildings, together with existing screening beyond the house, result in no impact to these views of the heritage asset.
- 4.13 Assessment of setting does not rest entirely on co-visibility but also on conceptual matters such as economy, ownership, and function. Considering these aspects, the Study Site will almost certainly have included fields in the ownership of the farmhouse from which a common function and economy resulted. The loss of the fields potentially impacts these aspects of the setting and therefore the historic value of the building. However, the connection with Imberhorne Manor and the Priory, was the original purpose and reason for the location of Imberhorne Farmhouse and this is not impacted. The loss of the agricultural connection, in relation to the strength of other aspects of significance, results in minimal impact to the building's setting.



Plate 7 Imberhorne Farmhouse – elevation from south-east



- 4.14 Imberhorne Farm Cottages are located to the south of the access lane and bridleway to Imberhorne Farmhouse. They are south-west of Imberhorne Farmhouse but are part of the group of associated agricultural buildings. To their north and north-west are agricultural buildings, to their south, smaller cottages.
- 4.15 The designated heritage status of the building is significantly elevated by remains of part of the Manor of Imberhorne remaining within its structure, with possible potential for remnants of even earlier structures to be present. This results in the Archaeological Value being assessed as medium. No excavation is proposed to this building therefore no impact is made upon its archaeological value.
- 4.16 The externally visible buildings are sound examples of local vernacular architecture expressed in local materials and detail. They are typical examples of small agricultural cottages and, their **Artistic and Architectural Values** would be low to medium.
- 4.17 However, this is very significantly enhanced by the presence of the remains of part of Imberhorne Manor within the historic fabric of the building which increases these values to medium. John Clark notes in his study of the building that *‘The construction of such a building within thirty years of the completion of Westminster Hall makes this property particularly important within the milieu of the developing structure of the arch-braced hammer beam, and demonstrates the influence of Westminster Hall in a vernacular context’*. The suggestion is that influence came from London, which reflects the position of the building on the route between London and Lewes, in that structural innovations from the capital influenced this building located at the time some way from a major settlement. The proposals do not impact the fabric of Imberhorne Farm Cottages as no work to them is involved.
- 4.18 **Historic Values** rest in both the cottages’ contribution to the rural vernacular building stock of Sussex, but this is elevated by earlier connection to the Manor of Imberhorne and the innovative structure of building embedded within their historic fabric. The Manor was also related to individuals of national and local importance and this value is medium. The proposals do not impact this value.
- 4.19 Although it is slightly to the south-west of Imberhorne Farmhouse, the setting of 1 – 3 Imberhorne Farm Cottages has the potential to be impacted in a similar manner. The immediate setting is very limited, in that the building is in proximity to additional cottages to the south and ancillary buildings the north-west, north and north-east. There is little immediate setting, and this is screened from the proposals by built form.
- 4.20 Considering the wider setting, there will be no views out of the building which might be impacted by the proposals as the Study Site is screened visually by the adjoining agricultural buildings. The only view not interrupted by either the cottages or stables, is that from the access road running to the east of the cottages, on which the proposals have no impact.
- 4.21 In association with Imberhorne Farmhouse, there are aspects of ownership, purpose and economy which connect the Study Site and Imberhorne Farm Cottages. However, the overwhelming importance of the building is its original purpose related to The Manor of Imberhorne, which is not impacted by the proposals. Whilst there is some impact to the non-visual aspects of the setting and therefore to the building’s historic value, these are less than substantial in relation to the overall significance of Imberhorne Farm Cottages.

- 4.22 Gulledge Farmhouse is located at the far end of the small lane which turns west off Imberhorne Lane and at the opposite end of which is Imberhorne Farmhouse and Imberhorne Farm Cottages. Ancillary farm buildings are located to its north-west, and its main elevation faces south. Located to the far south-west corner of the Study Site, it is bordered to the north and west by the access route and bridleway, and some way to the south is Worth Way, which is a public right of way following the Three Bridges and Tunbridge Wells Railway route. To the north-west, west and south-west is a proposed SANG (Suitable Alternative Natural Greenspace) Area.
- 4.23 The agglomeration of various eras visible within the historic fabric (Plate 5), results in the potential Archaeological Value of the building being medium. Extensive research has already been carried out which illustrates the building's adaptation to accommodate the evolving requirements of each resident. However, no excavation is proposed to this building therefore this value is not harmed.
- 4.24 Artistic and Architectural Values of Gulledge Farmhouse are invested in the layering of several styles and forms of construction, from the timber frame side elevations to the Jacobean stone 'front', topped by Tudor chimney stacks. Historic England's Listing cites it to be an '*Excellent example of a small manor house*'. This attempt to update the outmoded half-timbered structure but reducing the budget by carrying out the work to only where it would be highly visible, has resulted in an intriguing and attractive heritage asset in which the evolution of the fabric of the building is evident. artistic and architectural values are assessed as medium. The proposals do not impact these values.
- 4.25 The Historic Value of the building results from its representation of several historic eras, together with the evidence of even earlier times. Its location within land owned by The Manor of Imberhorne, and evidently relatively prosperous residents who, at times, clearly had aspirations to higher status possibly encouraged by the proximity of The Manor itself, resulting in this value being medium. Its position as an eminent local farm supports this assessment. The proposals do not impact this value.
- 4.26 There is however potential for the significance of the building to be impacted by development in its setting. The immediate setting to the heritage asset is bounded by existing mature tree screening to the north within its site, augmented to the north by existing mature trees and proposed additional planting. To the east is open land, to the west an area of SANG and to the south, a mixture of open land and a planted boundary to the bridleway which continues south. The proposals will not impact the immediate setting of Gulledge Farmhouse, nor will views out from the building be impacted. The main elevation faces south, and the Study Site is to the north, therefore enjoyment of the setting from Gulledge Farmhouse is not affected.



Plate 8 Gulledge – view from north on the bridleway and access route

- 4.27 In considering the wider setting of Gulledge Farmhouse, particularly assessing views towards the site, those views from the north, west and east will not be impacted as the development on the Study Site is not within them (Plate ).8 The view from the south, appreciated from Worth Way Public Right of Way, is too distant with extensive existing screening to the Study Site, to be impacted by development.
- 4.28 In common with Imberhorne Farmhouse and 1 – 3 Imberhorne Farm Cottages, there is potential for the non-visual aspects of the setting – ownership, economy, and purpose to be impacted by the proposals. Fields on the Study Site will have been in the ownership of Gulledge Farm which will be impacted by the development. However, the relatively self- contained immediate setting of the farm retains elements of these connections and their loss marginally impacts the historic value of the farm, but to an extent which would cause a low level of less than significant harm.



## 5.0 Summary and Conclusions

- 5.1 In summary, the requirements set out in section 2 have been carried out. The location of heritage assets which might be impacted by the development on the Study Site was identified. These were found to be Imberhorne Farmhouse (Grade II), 1 – 3 Imberhorne Farm Cottages (Grade II\*) and Gullede Farmhouse (Grade II\*), located on Figure 2.
- 5.2 Other heritage assets were at too great a distance to be impacted and there is no conservation area which is in such proximity as to be affected.
- 5.3 Research was then carried out into the history of the heritage assets in proximity to the Study Site and to assess their historic values which result in their significance. It was then considered if the proposals caused harm to that significance.
- 5.4 It was found that, for all heritage assets identified, no harm was caused by the proposals on their significance.
- 5.5 The setting of each individual heritage was considered to determine if their significance was harmed by development in their setting. It was found that, although lack of co-visibility prevented harm being caused, other non-visual aspects might be impacted.
- 5.6 These included the historic links between the heritage assets and the Study Site related to ownership, common purpose and economy, which had the potential to impact the historic value of each building.
- 5.7 In considering the extent of this harm, it was, assessed that, as much of the historic value lay in the assets relationship to the Manor of Imberhorne which was not impacted by the proposals, the extent of damage was minimal and considered as causing less than substantial harm to the significance of the buildings.
- 5.8 It is therefore concluded that the proposal is compliant with the relevant heritage paragraphs contained in Section 16 of the NPPF 2018 and relevant local heritage policy including policies

## Sources

### Archive

National Archive, Kew

### Cartographic

- Figure 1 Site Location
- Figure 2 Location of Listed Buildings in vicinity
- Figure 3 Tithe map of 1842
- Figure 4 Ordnance Survey Map of 1878-79
- Figure 5 Ordnance Survey Map of 1899
- Figure 6 Ordnance Survey Map of 1911-13
- Figure 7 Aerial Survey of 1947
- Figure 8 Ordnance Survey Map of 1963
- Figure 9 Ordnance Survey Map of 1978
- Figure 10 Ordnance Survey Map of 1999

### Websites

Heritage Gateway - [www.heritagegateway.org.uk](http://www.heritagegateway.org.uk)

Historic England - The National Heritage List for England - [historicengland.org.uk/listing/the list](http://historicengland.org.uk/listing/the-list)

Felbridge and District History Group – Imberhorne Farmhouse

Felbridge and District History Group –Gulledge Farmhouse

### Bibliographic

*An Early Vernacular Hammer-Beam Structure: Imberhorne Farm Cottages, East Grinstead, West Sussex* J. Clarke

**Imberhorne Farmhouse**

II

2. Good example of well-built farmhouse of 1820. 3 storeys 3 bays. The central bay projecting slightly and carrying a modified form of pediment. Sash windows, with 4 divisions vertically. Walls: brick. Roof: heavy stone slates. Front door with low, wide segmental fanlight.

**1-3 Imberhorne Farm Cottages**

GV II\* Former open hall, later three cottages. Nos. 2 and 3 comprised an early C15 open hall aligned east-west, timbers in No. 3 tree-ring dated to 1428. In the late C16 the open hall was veiled over and a chimneystack inserted. No. 3 is a late C18 or early C19 L-shaped wing addition to the north.

**MATERIALS:** Nos. 2 and 3 timber-framed, the ground floor underbuilt in brickwork on deep stone plinth, except to the west. The upper floor and gable end are tile-hung. Gabled roof of C20 machine-made tiles and central brick chimneystack, rebuilt above ridge level after 1926.

**PLAN:** Originally a two bay open hall with arch-braced hammerbeam roof, of which the central and western truss remain within No. 3. The eastern bay and solar extended into No. 2 and the west service end, comprising perhaps a narrow screens passage with a service bay or wing beyond, has not survived. In the late C16 the building was adapted to form a lobby entrance house by inserting a chimneystack and ceiling over the open hall. Probably in the late C18 or early C19 the building was converted into two cottages and a further cottage added in an L-wing to the north. Now two storeys, with irregular fenestration.

**EXTERIOR:** The ground floor brickwork is in English bond to the west, mainly Flemish bond to the north, south and east sides, except for the western half of the south side which has been refronted in C19 brown brick in stretcher bond, and the north and west facing sides of No. 1 are in English Garden Wall bond. The upper floor and gable ends are tile-hung with a wide band of twelve courses of pointed tiles to the west gable end. Windows are irregularly-spaced casements. The ground floor of the north gable has a C19 tripartite casement. A similar tripartite window on the south side has been replaced in uPVC. No. 3 retains three C19 wooden casements on the north and one on the south. Other windows are C20, some wooden but most uPVC, within earlier openings. No. 1 has a late C20 door and brick and tiled surround facing east, No. 2 has an entrance facing south and No. 3 one facing east, both with four-panelled doors in cambered arches under penticed tiled weatherhoods on wooden brackets. Both have narrower plank doors approached by stone steps facing north. On the north side ground floor where the L-shaped wing adjoins is a projecting rectangular breadoven, mainly of stone blocks, the upper part in English bond brickwork with tiled roof.

**INTERIOR:** Visible early features are inside No 3. The ground floor is divided into two rooms, the smaller northern room, now kitchen, has a central axial beam and early C19 fireplace in the eastern



wall with a C19 cast iron range. The south ground floor room, the living room, has a continuation of the axial beam in the kitchen with a spine beam abutting it at right angles and a further short spine beam attached to the western wall. Although the fireplace is a small early C19 fireplace, identical to the one in the kitchen, it is thought that an open fireplace with bread oven may survive beneath and this would continue into No. 2. To the south of the fireplace is an early C19 plank door on pintle hinges leading to a half-winder staircase. The staircase walls are lined with early C19 vertical beaded boards. A section of the wallplate is visible here and also the upper part of the late C16 chimneystack. A plank door leads to the large south bedroom where the lower part of the two medieval trusses are visible. The eastern truss was an arch-braced hammerbeam to the former open hall, later adapted to form a first floor partition, inserted in the later C16 when the chimneystack was inserted and the open hall ceiled over. On the south side facing west the inner hammer spandrel has an inscribed, cusped quatrefoil, flanked by foil and dagger motifs, of a type more usual in stonework. The reverse side of the spandrel, now situated in a cupboard, is undecorated. The northern spandrel has an outer spandrel marked for the carving of a similar quatrefoil with teardrop, but this appears not to have been executed. The western truss has jowled posts, tie beam and mid-post visible. The north and south wallplates are exposed. A smaller room has been partitioned off in the north west corner, now a bathroom. This is approached through a ledged plank door. The roof retains a virtually complete roof structure dated to 1428 with smoke-blackened timbers. The eastern truss has visible the vertical members of the hammerbeam, collar beam, a giant arch and scissor braces above the collar beam. A post-medieval wattle and daub partition now divides the roof of No. 3 from the adjoining property. Most rafters survive with shorter rafters for a louvre to the west of the eastern truss. There are single clasped purlins and two rows of plain concave windbraces which form diamond patterns. The western truss has no signs of weathering, nor is there a sill beam beneath the western wall, which suggests it was a spere truss with a narrow bay for the screens passage and a service bay or wing beyond it originally.

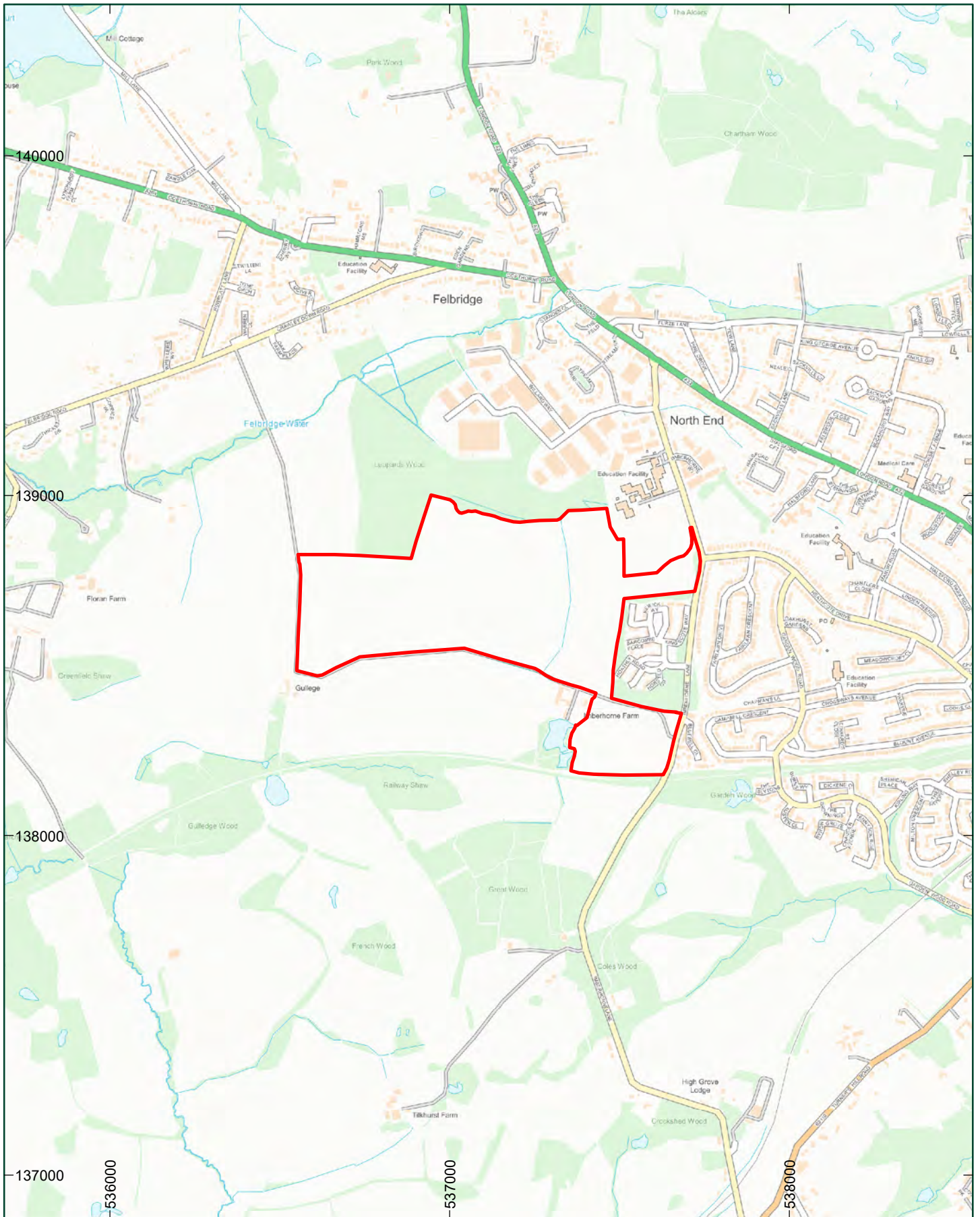
**HISTORY:** According to the "Chartulary of St Pancras, Lewes" in about 1100 a half-hide of land called Imberhorne was given to Lewes Priory by William Malfield. Lewes Priory continued to add land in the area and by 1275 had amassed the substantial manor of Imberhorne. The remaining timber-framed structure within Nos. 1-3 Imberhorne Farm Cottages has been tree-ring dated to 1428. Although no court rolls or Priory records have survived which refer to the construction of the property, from 1414 Lewes Priory was undergoing a period of building work on its decayed manors under Prior Nelond. Imberhorne is situated at the northern end of Lewes Priory's landholding about halfway along the main route between London and Lewes, roughly a day's ride to each, and is likely to have been constructed as a dwelling providing accommodation between London and Lewes on Lewes Priory lands. Imberhorne Manor was held by Lewes Priory until the Dissolution of the Monasteries when it passed to Thomas Cromwell, Earl of Essex and royal minister. The manor was purchased by Sir Richard Sackville in 1560 and the first documentary reference to a property there is a lease of 1580 where it is described as a "capital Messuage". A building is shown here on a terrier map of 1597-98. The adjoining Imberhorne Farmhouse was built in 1808 and perhaps at that time the older building became farm cottages. Imberhorne Manor remained in the hands of the Sackvilles, the Dukes of Dorset, until 1872, when it was sold as an independent country estate. On the 26th June 1926 Nos. 1-3 Imberhorne Farm Cottages was struck by lightning and a contemporary photograph shows that the top of the chimneystack between Nos. 2 and 3 collapsed and the roof of No. 2 was extensively damaged.

SUMMARY OF IMPORTANCE: This building is particularly interesting because it retains the surviving part of a C15 timber-framed open hall, tree-ring dated to 1428, built for Lewes Priory. This was a building of high quality which retains a decorated spandrel, two trusses and roof of an elaborate early arch-braced hammerbeam roof. Arch-braced hammerbeam roofs are rare and this is the only surviving example known of a vernacular building using a very close copy of Herland's design for the Great Hall at Westminster. This very special architectural survival of structure merits this high grade of listing.

### **Gulledge Farmhouse**

II\*

Excellent example of small manor house early C17 once belonging to Allfrey family. Chief front to south, built of stone, with stone dormers, mullions, gables, finials, strings etc. Local stone. East front timber framed. West front timber framed but covered with tiling. North front, roof sweeping down to within 5 feet of ground. 2 magnificent stacks. Roof: Horsham slabs.



#### Legend

 Site Boundary

1:15,000 at A4

0 300m

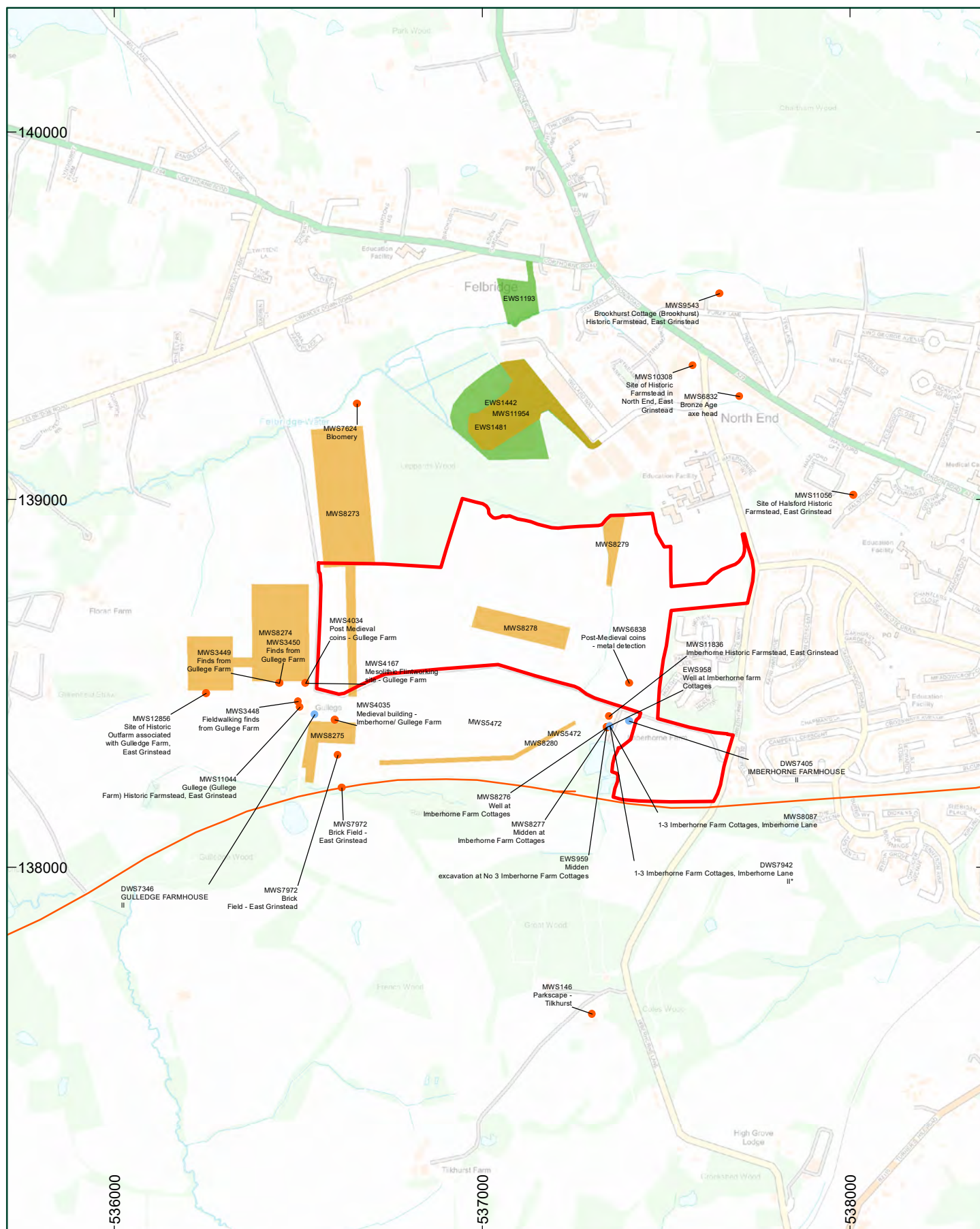


**Title:**  
Fig. 1: Site Location  
**Address:**  
East Grinstead



**orion.**





**Legend**

- Site Boundary
- Monument Point
- Monument Polyline
- Monument Polygon
- Event Point
- Event Polygon
- Listed Buildings

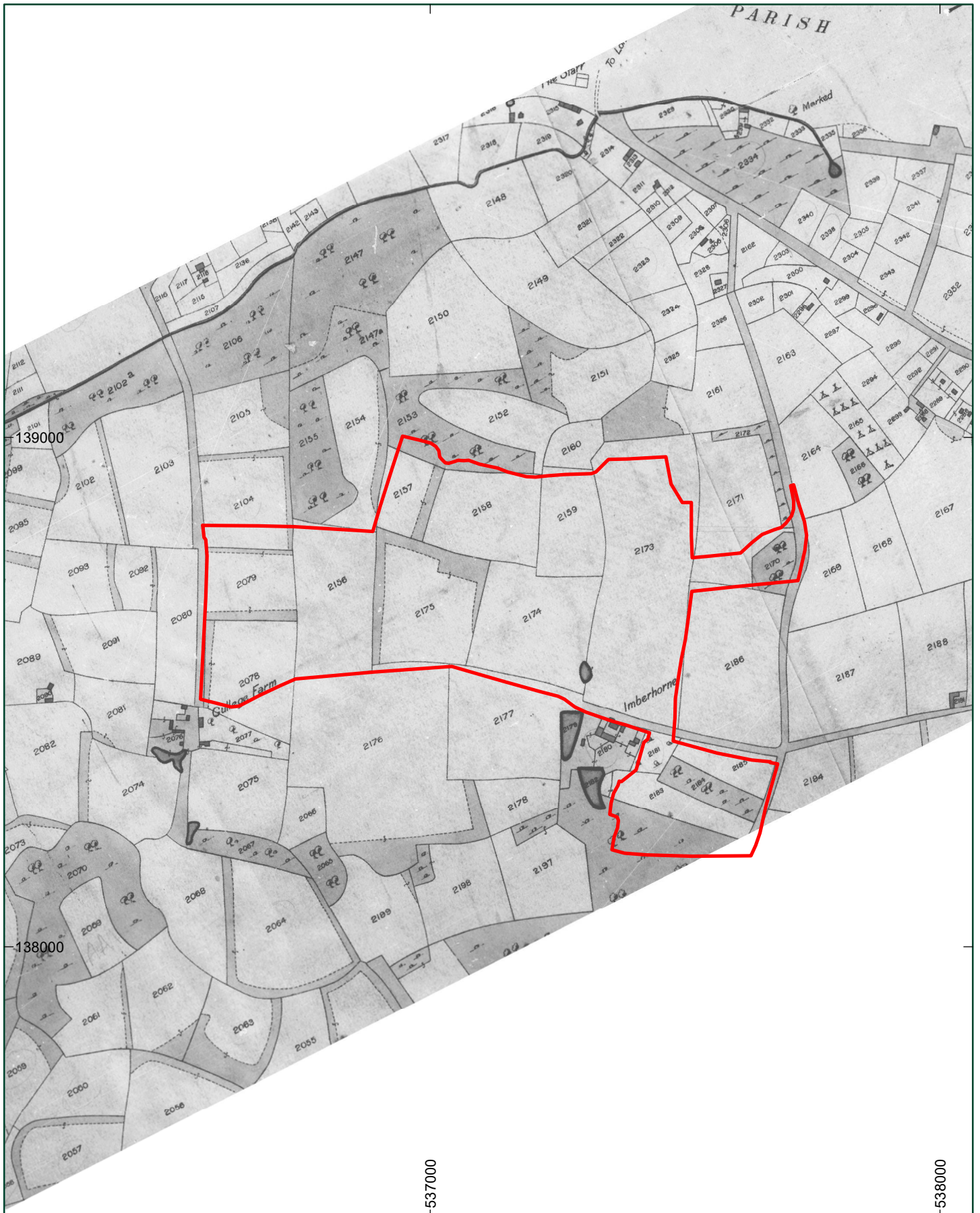
1:14,000 at A4

0 400m

**Title:**  
Fig. 2: Location of HER records in relation to study site  
**Address:**  
East Grinstead



**orion.**



Legend

 Site Boundary

1:10,000 at A4

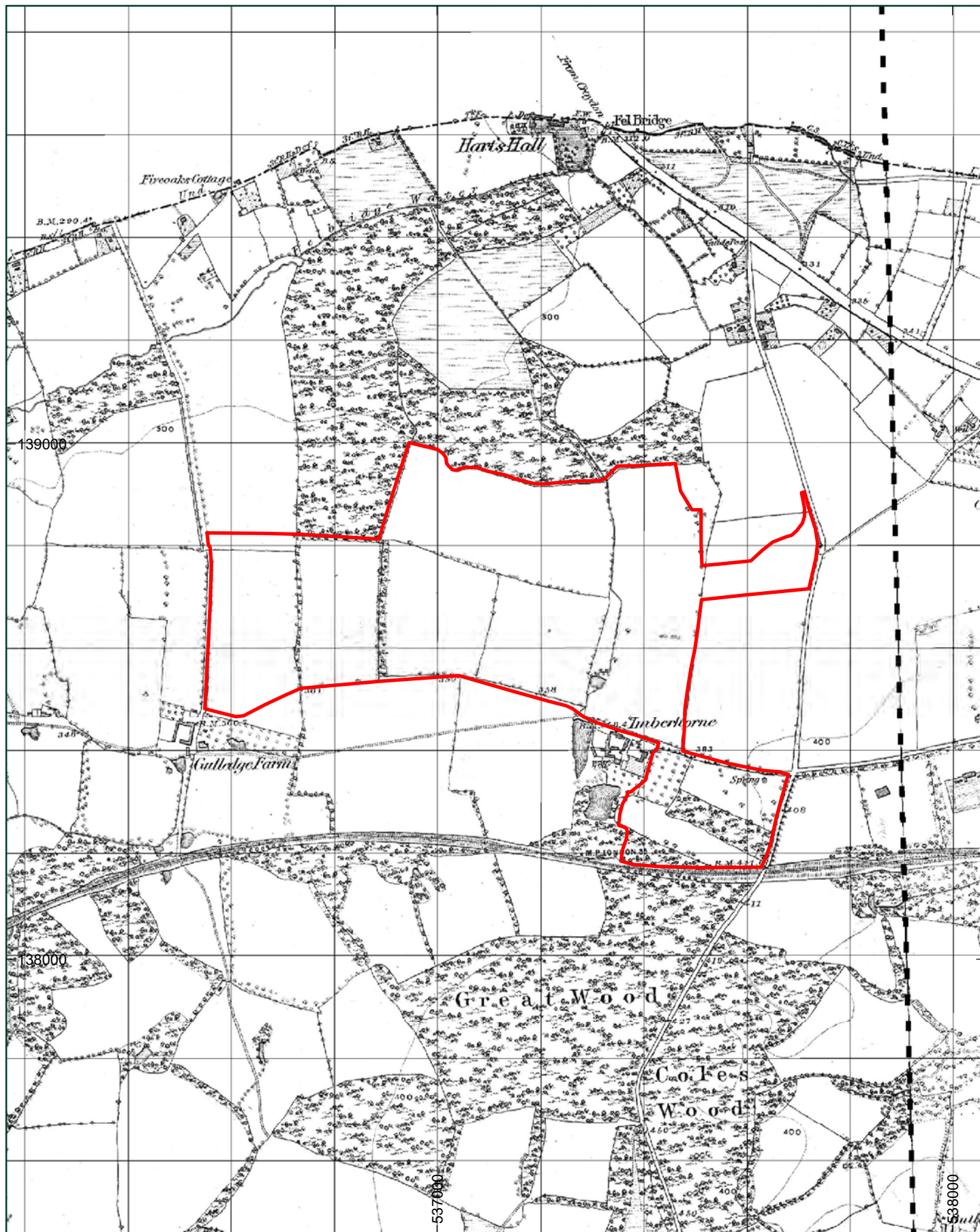
0 200m

Title:  
Fig. 3: 1842 Tithe Map  
Address:  
East Grinstead



orion.





Legend

 Site Boundary

1:10,000 at A4

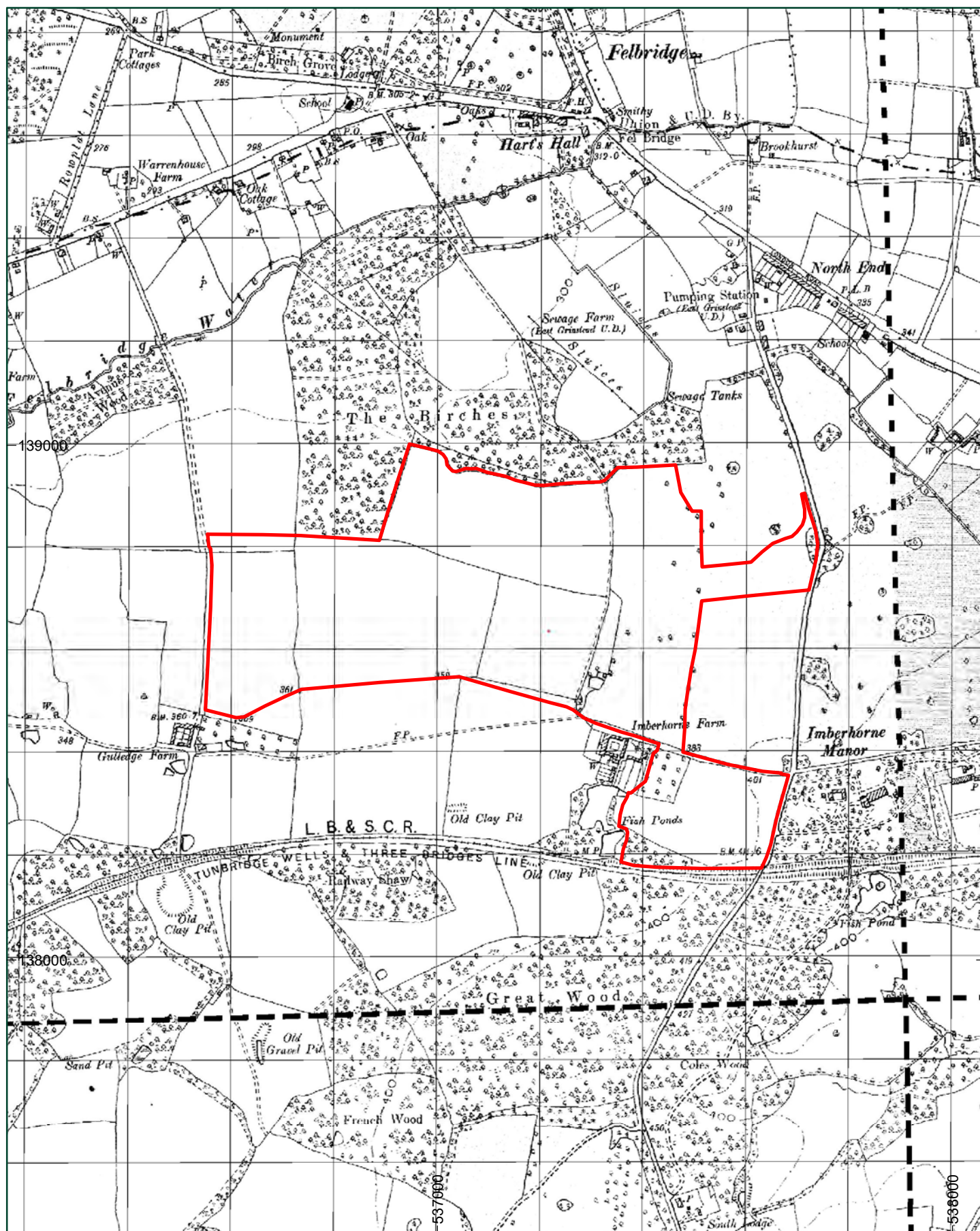
0 200m

Title:  
Fig. 4: 1878-1879 OS  
Address:  
East Grinstead



**orion.**





Legend

Site Boundary

1:10,000 at A4

0 200m

Title:  
Fig. 5: 1899 OS  
Address:  
East Grinstead

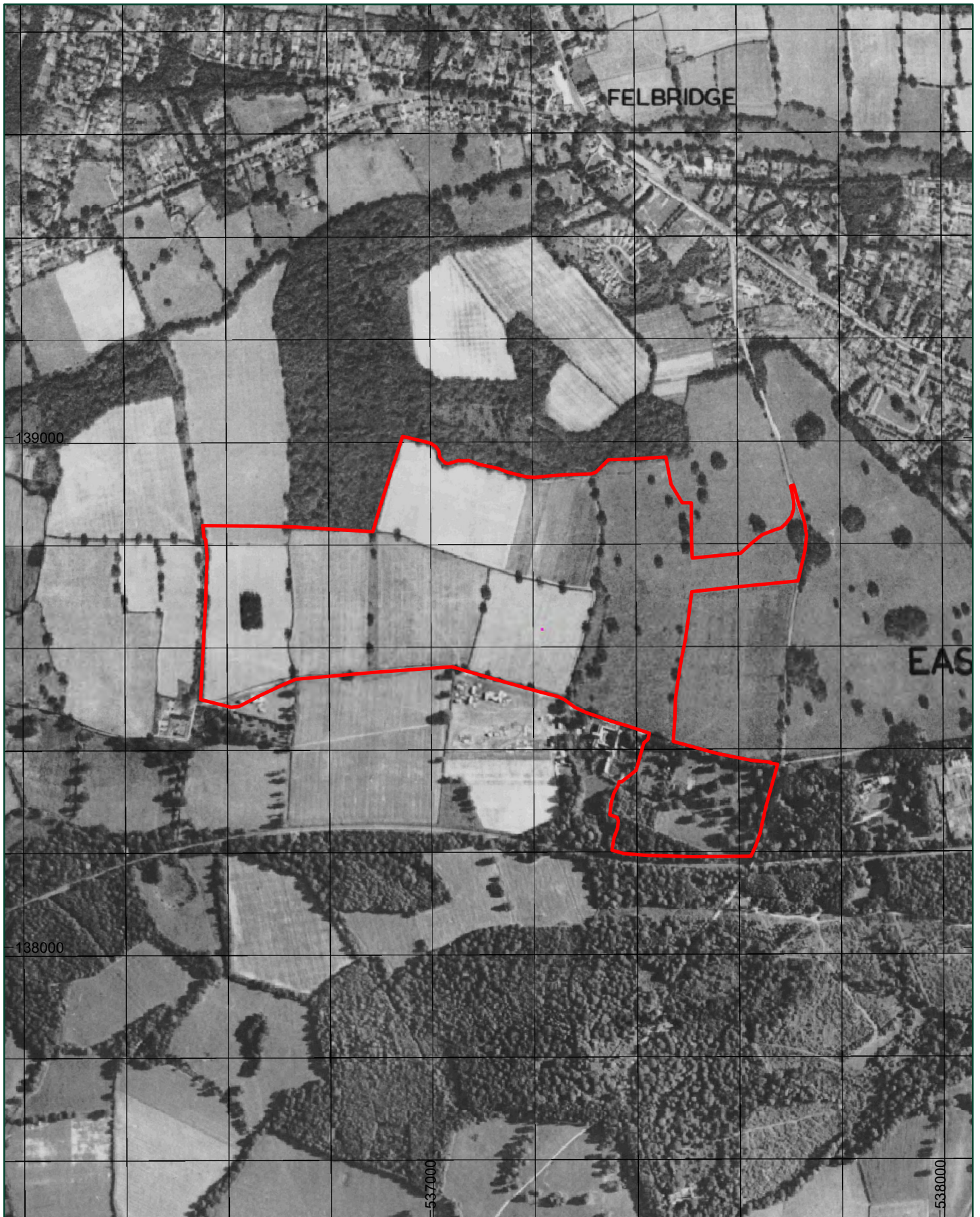


**orion.**









Legend

 Site Boundary

1:10,000 at A4

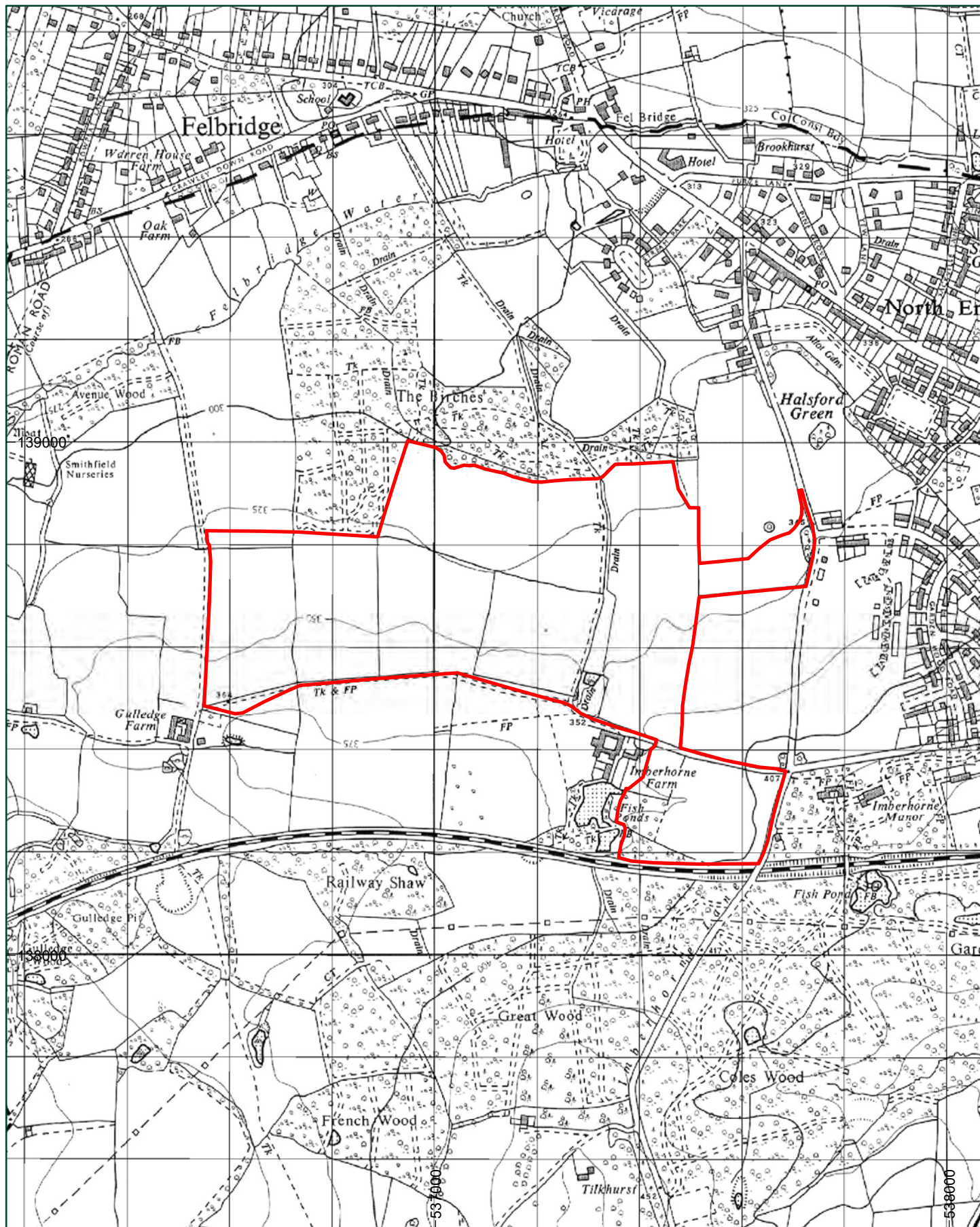
0 200m  


Title:  
Fig. 7: 1947 Aerial Photograph  
Address:  
East Grinstead



**orion.**





#### Legend

 Site Boundary

1:10,000 at A4

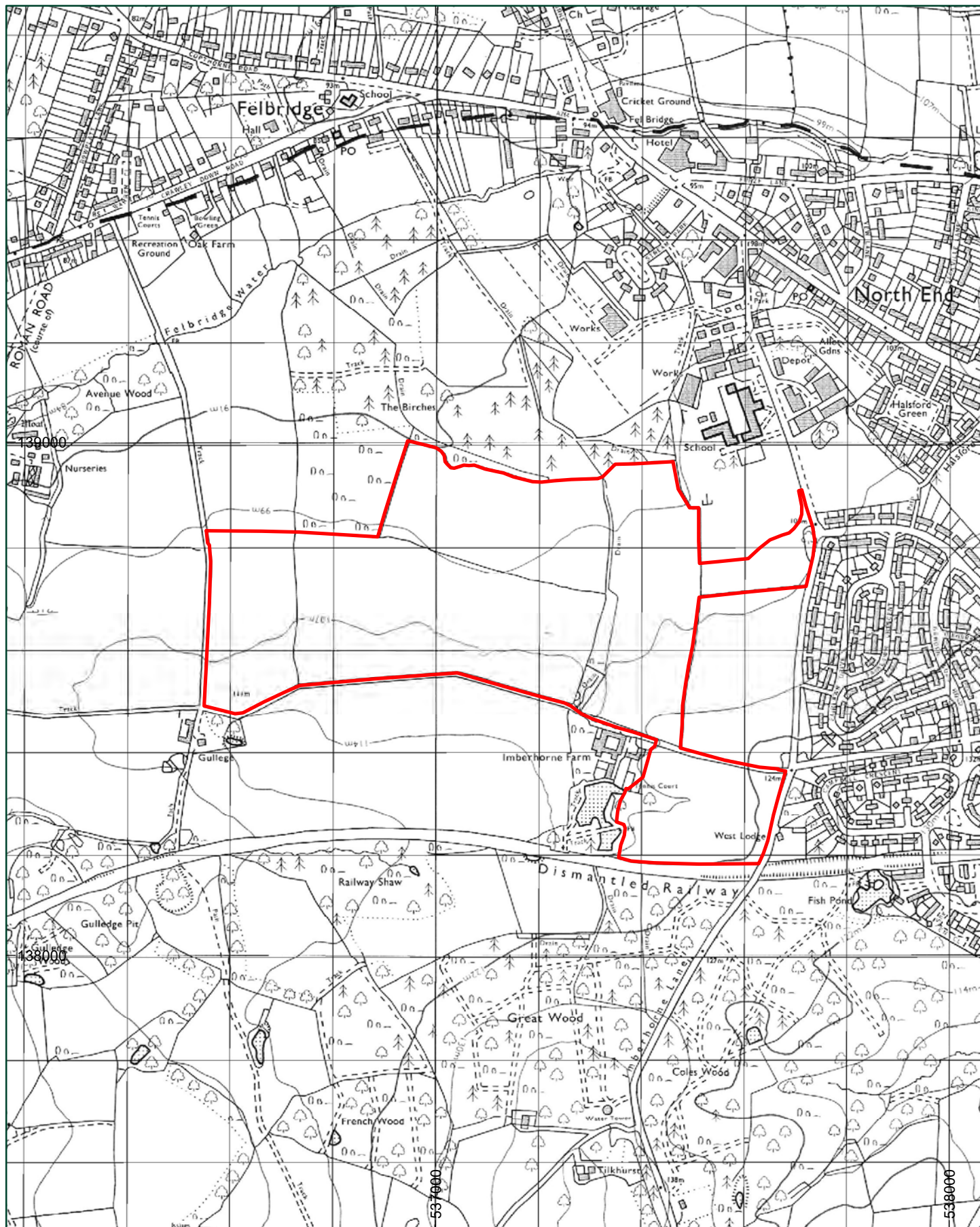
0 200m

Title:  
Fig. 8: 1963 OS  
Address:  
East Grinstead



**orion.**





#### Legend

Site Boundary

1:10,000 at A4

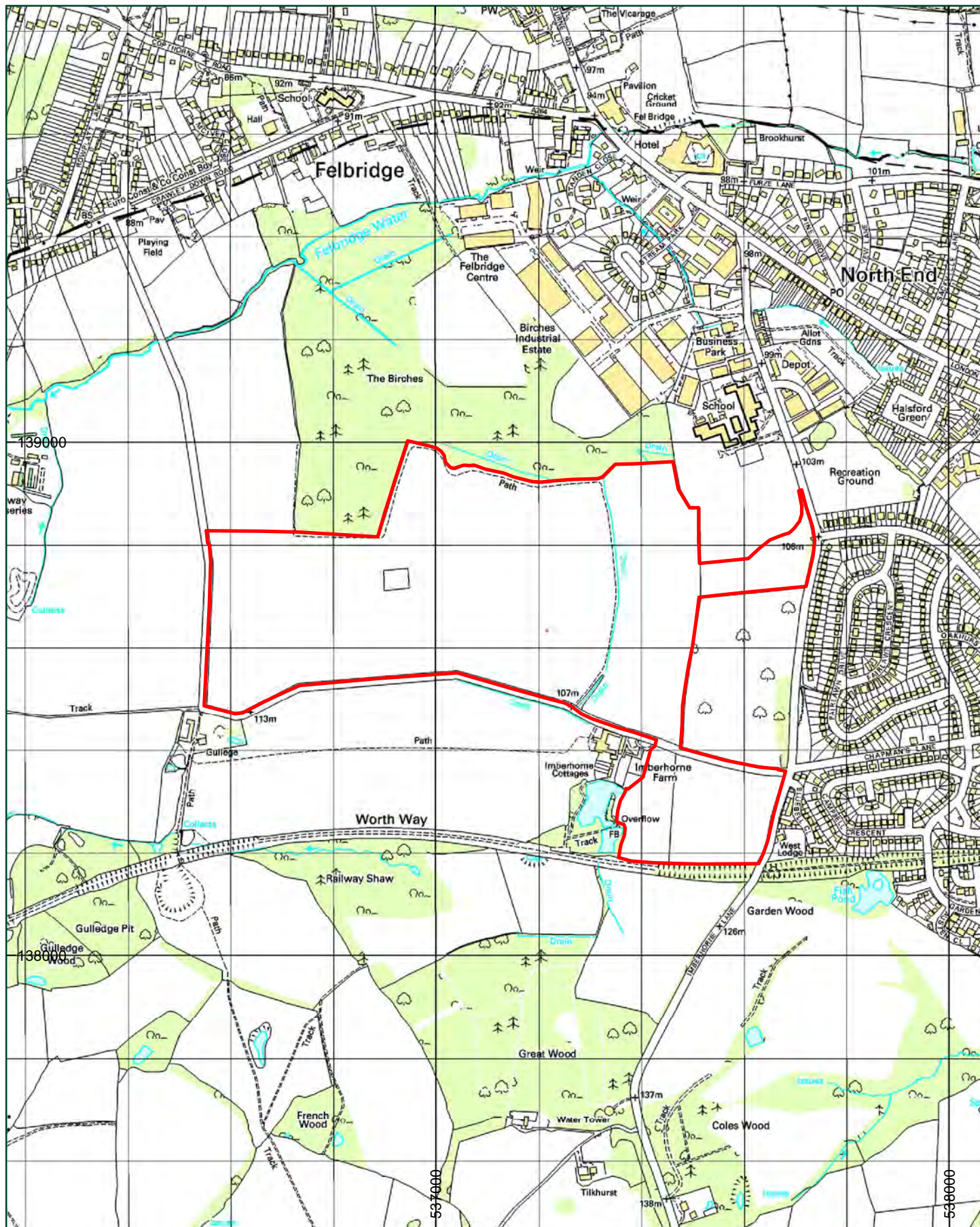
0 200m

Title:  
Fig. 9: 1978 OS  
Address:  
East Grinstead



**orion.**





Legend

 Site Boundary

1:10,000 at A4

0 200m



Title:  
Fig. 10: 1999 OS  
Address:  
East Grinstead



**orion.**



140000



- LEGEND**
- Draft Allocation 45.85 Ha
  - Site Boundary
  - Additional Land 71.32 Ha
  - Proposed SANG area (including strategic SANG)
  - Land Proposed for Timberhome School Expansion
  - ↔ Vehicular access point
  - ↔ Pedestrian/ cycle link
  - Residential development
  - Local Centre
  - ZPE primary school and community building
  - Care community
  - Public open space
  - Allotments
  - Areas for attenuation
  - Proposed areas for formal play
  - Tree and hedgerow planting (existing and proposed)
  - Street Tree Planting
  - Informal footpath route
  - Retained access to existing farmhouse and bridleway
  - PRoW: Worth Way

137000

536000

537000

538000

Legend

Site Boundary

1:10,000 at A4

0 300m

Title:  
Fig. 11: Proposed Masterplan  
Address:  
East Grinstead



**orion.**



## **Imberhorne Farm, East Grinstead**

### **Flood Risk and Drainage Strategy - Non-Technical Summary**

On behalf of **Welbeck Strategic Land (II) LLP**

Project Ref: 49426/002 | Rev: 00 | Date: 8<sup>th</sup> July 2020

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## Document Control Sheet

**Project Name:** Imberhorne Farm, East Grinstead

**Project Ref:** 49426

**Report Title:** Flood Risk Assessment and Drainage Strategy – Non-Technical Summary

**Doc Ref:** 49426/002

**Date:** 8<sup>th</sup> July 2020

	Name	Position	Signature	Date
<b>Prepared by:</b>	Sian Griffiths	Senior Engineer		July 2020
<b>Reviewed by:</b>	Elisabetta Torricelli	Director		July 2020
<b>Approved by:</b>	Elisabetta Torricelli	Director		July 2020
<b>For and on behalf of Stantec UK Limited</b>				

Revision	Date	Description	Prepared	Reviewed	Approved

This report has been prepared by Stantec UK Limited ('Stantec') on behalf of its client to whom this report is addressed ('Client') in connection with the project described in this report and takes into account the Client's particular instructions and requirements. This report was prepared in accordance with the professional services appointment under which Stantec was appointed by its Client. This report is not intended for and should not be relied on by any third party (i.e. parties other than the Client). Stantec accepts no duty or responsibility (including in negligence) to any party other than the Client and disclaims all liability of any nature whatsoever to any such party in respect of this report.



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No table of figures entries found.

## Appendices

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## Executive Summary

Stantec UK Ltd (Stantec) has prepared a Non-Technical Summary of the preliminary Flood Risk Surface and Drainage Strategy on behalf of Welbeck Strategic Land (II) LLP (WL) for a housing allocation with Local Centre, and Care Community (C2), early years and primary school (2FE), Strategic SANG, public open space and children's equipped playspace and provision of land for playing fields associated with Imberhorne School on land at Imberhorne Farm, East Grinstead

The land is currently defined as greenfield and due to the underlying ground conditions; it is unlikely that relying on surface water to soak away into the ground will be a sufficient means of draining it. Therefore, it is assumed that the site is not served by any drainage infrastructure other than that provided by the existing ditches crossing the site.

It is proposed that surface water flow from the site is restricted to less than the current rate at which it leaves the site (Mean Annual Greenfield Run-off Rate). This will ensure that there is no increased risk downstream from the proposed development.

It is proposed that storage for surface water will be provided in ponds and swales incorporated within the site that will provide amenity and a biodiversity benefits along with removing any pollutants arising from local traffic from the water before it gets discharged to the wider surface water network.

The size of the ponds will be calculated to take into account an additional 40% allowance for any increase in rainfall caused by climate change.

In conclusion, the proposed scheme complies with the local and national planning guidance and it has been demonstrated that surface water can be appropriately managed in accordance with both.



# 1 Introduction

## 1.1 Background and Development Proposals

- 1.1.1 Stantec UK Ltd (Stantec) has prepared a Non-Technical Summary of the preliminary Flood Risk Surface and Drainage Strategy on behalf of Welbeck Strategic Land (II) LLP (WL) for a housing allocation with Local Centre, and Care Community (C2), early years and primary school (2FE), Strategic SANG, public open space and children's equipped playspace and provision of land for playing fields associated with Imberhorne School on land at Imberhorne Farm, East Grinstead.
- 1.1.2 The Flood Risk and Drainage Strategy has been prepared in accordance with local and national the following policy and guidance. In particular West Sussex County Council's Lead Local Flood Authority (LLFA) Policy for the management of Surface Water, November 2018.

## 1.2 Development Proposals

- 1.2.1 Development proposals for the site comprise a mixed-use development for circa 550 residential dwellings, an extension to the Imberhorne Upper School (providing a net increase of 4ha of land) enabling the relocation of the Lower School, a 2 form entry Primary School including early years provision, a care village, public open space, a strategic SANG, a local centre and associated infrastructure.
- 1.2.2 Surface Water Drainage proposals are set out on Barton Wilmore drawing - Concept Drainage Layout, is presented in **Appendix A**.



## **2.3 Existing Watercourses and Flood Risk**

- 2.3.1 There is an open ditch flowing northwards within the site boundary, the head of which is located directly north of Imberhorne Farm. When it leave the site, it flows west immediately adjacent to the northern boundary of the site through The Birches woodland area to the north before flowing north again and discharging into Felbridge Water (designated Ordinary Watercourse), approximately 450m from the northern boundary. WSCC are responsible for this watercourse as their roll as Lead Local Flood Authority.
- 2.3.2 A review of the EA's Online Flood Map for Planning indicates that the site is located within Flood Zone 1. This is defined as having a 'Low Probability' of flooding from the rivers and sea and is defined as having less than a 1 in 1000 annual probability (<0.1%).

## **2.4 Ground Conditions**

- 2.4.1 A review of British Geological Survey (BGS) online digital viewer indicates that geology across the allocated development is variable:
- The area to the north of the access track and Bridleway where the majority of the site lies is underlain by 'Upper Tunbridge Wells Sand' comprising Sandstone and Siltstone.
  - The geology to the south of the access track underlying the proposed Care Community, is underlain by the 'Grinstead Clay Member' comprising Mudstone.
  - No superficial deposits have been recorded by the BGS at this site.

## **2.5 Existing Drainage**

- 2.5.1 As the site is currently undeveloped greenfield land, there are no public surface water sewers within the site boundary, it is assumed that the site is not currently served by any drainage infrastructure apart from the existing system of open ditches.
- 2.5.2 The nearest foul water sewers that could be used to serve the site are located within Imberhorne Lane and Hills Road. Any connection has to be approved by Southern Water who will undertake the necessary checks to ensure the existing system will cope with additional flow.



## 3 Surface Water Management Strategy

### 3.1 Principles for the management of Surface Water

- 3.1.1 As set out in national guidance, there is a requirement to consider the impact of development on the flood risk of the proposed development itself and the surrounding area. This includes the consideration and allowance of future climate change on peak rainfall intensities which may result in increased risk in the future, which for this report an additional 40% has been allowed for.
- 3.1.2 A suitable strategy for the management of surface water runoff from the proposed development has been prepared, which takes account of the information above (site topography, existing watercourses and flood risk, ground conditions and existing drainage) to ensure flood risk to the site and wider area is not increased.
- 3.1.3 In addition to this, SuDS (Sustainable urban Drainage Systems) principles are also incorporated into the strategy. These include water quality, water quantity, amenity and biodiversity which requires all surface water to be dealt with on site before being discharged to the wider network at a controlled rate, normally stored on site within features such as swales and ponds which naturally remove pollutants from the water arising from such things such as domestic vehicles whilst also providing habitats for wildlife (both flora and fauna) and pleasant outdoor spaces.

### 3.2 Proposed Surface Water Drainage Strategy

- 3.2.1 The most appropriate method of surface water discharge has been determined based on the 'hierarchy of surface water disposal' as set out within WSCC's Policy for the Management of Surface Water (November 2018), SuDS Policy 1: Discharge Hierarchy, as described below:
- to ground (soakaway into the ground),
  - to a surface water body (in this case, the open ditch located within the site boundary),
  - to a surface water sewer, highway drain, or another drainage system, or
  - to a combined sewer where there are absolutely no other options, and only where agreed in advance with the relevant sewerage undertaker.
- 3.2.2 Based on the information given above regarding ground conditions and existing drainage, it is unlikely that relying on surface water to soakaway into the ground will be sufficient and there are no existing points of connection to a formal sewer or piped drainage system.
- 3.2.3 Therefore, the most appropriate means of surface water management would be to store surface water on site within a network of swales and ponds to be released at a controlled rate of flow to the existing open ditches located within the site, ultimately making it way to Felbridge Water.

#### Controlled Flow of Surface Water from the Site

- 3.2.4 The rate at which water leaves the site is based on the current rate at which water leaves the site, known as the Mean Annual Greenfield Run-off Rate. This is worked out using statistical methods set out by the Institute of Hydrology. The Mean Annual Greenfield Run-off Rate will always be less than the current conditions, meaning that less surface water is entering the wider network. This in turn means that any flood risk that may have been present before development will be improved once the new development takes place.

### **Exceedance Flows**

- 3.2.5 In the event that rainfall conditions exceed the capacity of the proposed drainage network, all surface flow will be directed away from buildings and to areas designed to accommodate excess flows, whilst maintaining safe access to the development and to individual residential properties.

## **4 Proposed Foul Water Drainage Strategy**

### **4.1 Method of Foul Water Discharge**

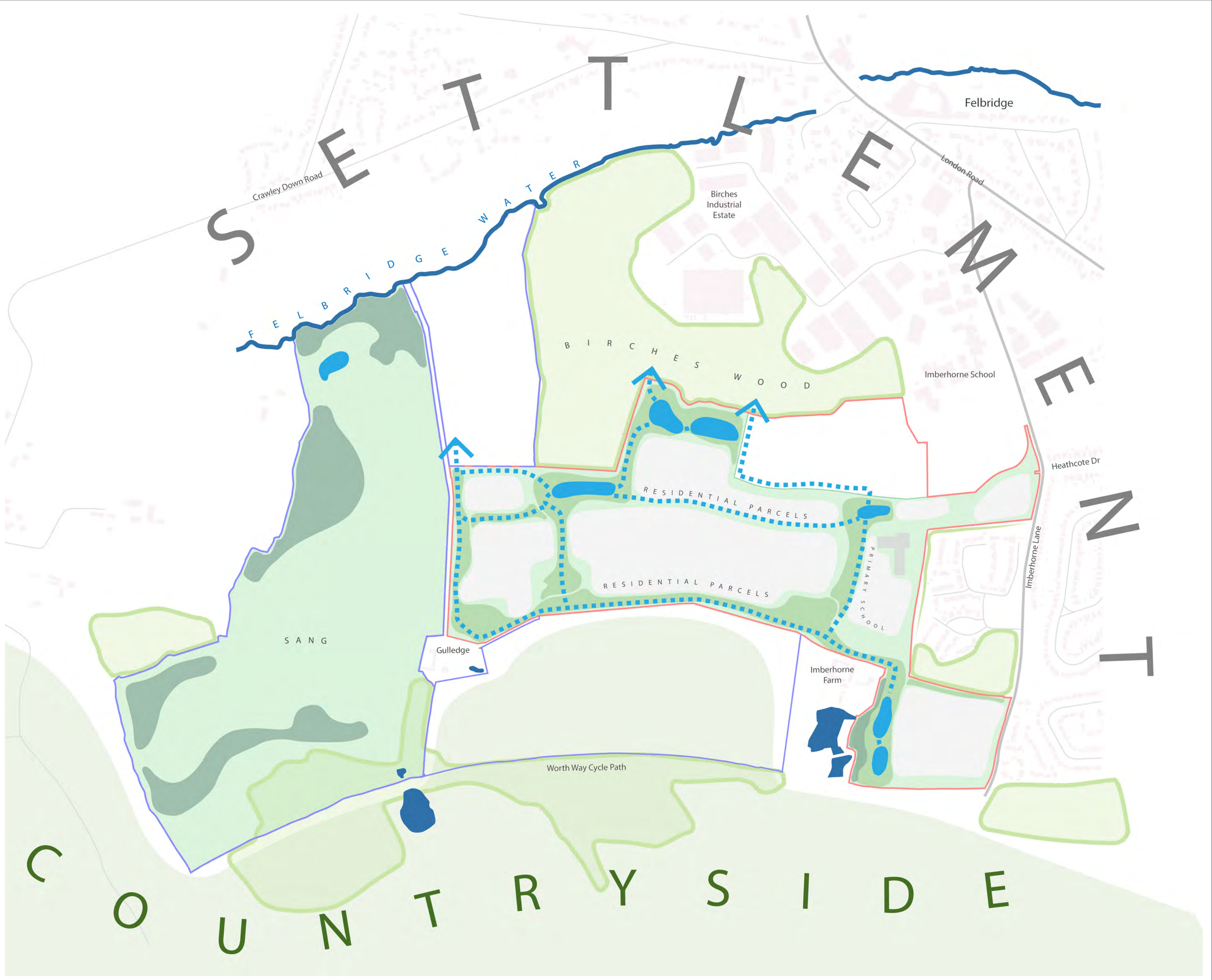
- 4.1.1 Due to the prevailing topography across the allocated site and locations of existing foul water drainage infrastructure, foul water drainage will be provided using a conventional piped network directing flows to a foul water pumping station which will pump flows to an existing Southern Water sewer.



## Appendix A

Barton Wilmore drawing - Concept Drainage Plan





- Site boundary
- Additional Land
- Existing Components**
  - Settlement
  - Countryside
  - Main Roads
  - Contours
  - Existing hedgerow pattern
  - Existing Woodland
- Proposed Components**
  - Public Green Space network
  - Linear Park
  - Strategic landscape (Woodland)
  - Residential parcels (Including areas of permeable paving, and rain gardens)
- Existing Components - Blue Infrastructure**
  - Felbridge Water
  - Existing standing water (Basins, Ponds)
- Proposed Components - Blue Infrastructure**
  - Sustainable Urban Drainage network (Ponds, Basins)
  - Open Ditch/ Swales in Green Corridors

PROJECT  
Imberhorne

DRAWING TITLE  
Blue Infrastructure

DATE 17.07.2020	SCALE	DRAWN BY PC	CHECK BY RMcW
PROJECT NO 23687	DRAWING NO BR-L-PL001	REVISION -	

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WILLMORE**  
bartonwillmore.co.uk

Planning | Master Planning & Urban Design  
Architecture | Landscape Planning & Design | Project Services  
Environmental & Sustainability Assessment | Graphic Design

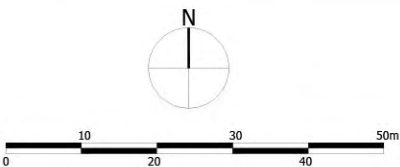
Offices at Reading London Bristol Cambridge Cardiff Ebbw Vale Edinburgh Leeds Manchester Solihull





Revision	Date	Drn	Ckd
A	15.06.20	PL	PN
B	10.07.20	CM	JT
Layout revised for view corridor			
Layout Coloured			

C2 CARE VILLAGE, IMBERHORNE						
Drawing: SK-01 Sketch Layout						
House type	No's	Sq. ft.	Sq. m.	Storeys	Bedrooms	Total Sq. Ft.
Accommodation						
1B ExtraCare Apt	38	592	55	F	1	22,497
2B ExtraCare Apt	43	775	72	F	2	33,325
2B ExtraCare Bung	28	732	68	1	2	20,495
2B Ind Care Dwelling A	18	1389	129	1.5	2+5	24,994
2B Ind Care Dwelling A	2	1259	117	1.5	2+5	2,519
2B Ind Apt A	3	624	58	F	1	1,873
2B Ind Apt B	9	797	74	F	2	7,169
Estate Manager	1	1554	129	1.5	2+5	1,554
Accom. sub-total	142					114,425
Communal (Excl. Circulation) Lounges, Restaurants, Treatment Rooms, Nurses Station						
ExtraCare Block	11851	1101				11,851
Independent Care Block	3939	366				3,939
Comm. sub-total		15790	1467			15,790
Total Dwellings	142					Total sq. ft. 130,215
* All areas and unit numbers subject to detail design.						



Project  
Imberhorne

Drawing Title  
Care Village  
Capacity Sketch Layout

Date	Scale	Drawn by	Check by
28.02.20	1:1000@A3L	JT	CdeB
Project No	Drawing No	Revision	
25626	SK-01	B	



# Demand Study

## Potential Care Home &/or Extra Care Scheme

Site at Imberhorne Farm  
East Grinstead  
RH19 1TX

# 1. Introduction

## Scope of report

Avison Young has been instructed to provide a Demand Study in respect of a potential care home for the elderly and/or an extra care housing scheme on the site at Imberhorne Farm, East Grinstead RH19 1TX ("the site").

This report and analysis seeks to assess the current need for additional care home beds and private leasehold extra care housing units for the elderly within a defined catchment area.

We have prepared our demand study based upon two separate catchment areas. Firstly, we have assessed the need for care home beds within a 'market' catchment from the site of approximately 5 miles. Secondly we have assessed the need for an extra care housing development within a 10 mile catchment from the site.

It is the focus of this report to explore whether or not there is a demand for additional care home beds and extra care housing for the elderly in the area.

Important to our findings has been our research into the demographics of the catchment areas, the existing supply of care homes for the elderly and extra care housing units and the potential development pipeline for future schemes.

The report has been prepared as part of Welbeck Land's due diligence and comprises a demographic and competition review. The market advice provided within this report does not constitute a valuation and falls outside of the RICS Valuation – Global Standards 2017.

The following sources of information have been relied upon:

- Care Quality Commission (CQC) website
- Carehome.co.uk
- Demographic statistics from Experian
- LaingBuisson Age Standardised Demand (ASD) statistics
- Relevant local authority online planning application databases
- National Statistics – Census 2011 Data
- EGi database of planning applications
- Housing Learning and Improvement Network: 'More Choice, Greater Voice' - a toolkit for producing a strategy for accommodation with care for older people. (housinglin.org.uk)
- Housing Learning and Improvement Network: 'Strategic Housing for older People Resource Pack (SHOP)' (housinglin.org.uk)
- Land Registry
- POPPI
- Experian

Overview of Instruction	
Client	Welbeck Land
Site Address	Imberhorne Farm, East Grinstead, RH19 1TX
Date of Instruction	August 2019
Our Reference	02B905406
Scope of Work	Care Home and Extra Care Demand Study

## 2. Executive summary

The distance individual's travel to find a suitable care home and extra care accommodation varies depending upon the location of the site, whether it is an urban or rural location. Given the location of the subject site, we consider a 5-mile radius catchment area for care home and 10 mile for extra care to be appropriate for the markets respectively.

The demographic profile of our 'market' catchments indicate that they will experience a significant increase in the population aged 65 years and over.

### Care Home Summary

The population aged over 85 is expected to increase between 2017 and 2022 by 13.6% within the catchment (5 miles) for a proposed care home. This is a large increase within the age group from which the majority of care home residents are likely to come.

By utilising the Age Standardised Demand (ASD) percentages from LaingBuisson, we estimate that the number of care beds currently required is 556 which is a large market size reflecting the rural location of the catchment. The catchment has 13 existing care homes providing a total of 596 registered beds with no additional beds identified in the pipeline through our planning research. Therefore, we consider that there is an existing oversupply of 40 registered beds within the catchment.

#### Estimate undersupply / oversupply of care home beds (2017)

	Registered Beds	En-suite Beds only
Total estimated need for care home beds	556	556
Existing supply of elderly care home beds	596	470
Planned supply of elderly care home beds	0	0
Over / Undersupply of Existing Care Beds	-40	86

Whilst there is a slight over supply, the statistics do not take into account a qualitative element to the existing provision. We have therefore assessed the existing market based upon those existing beds which provide an en-suite only. In which case there is in fact an undersupply of 86 beds.

Due to the timescales involved in the acquisition of a development site, obtaining planning permission and constructing a new care home, we have also considered the situation based upon the projected population in 2022 as summarised below.

#### Estimate undersupply / oversupply of care home beds 2022

	Registered Beds	En-suite Beds only
Total estimated need for care home beds	665	665
Existing supply of elderly care home beds	596	470
Planned supply of elderly care home beds	0	0
Undersupply of Existing Care Beds	69	195

Based on the population projections, there will be a significant undersupply of care home beds as at 2022. This of course assumes that no additional beds are added within this period. However even if there were additional beds created there is still a significant undersupply especially when we focus on only those registered bedrooms which provide an en-suite. By 2022 we estimate that there will be a large undersupply of 195 beds with en suite facilities.

### Private Leasehold Extra Care Housing Summary

The population aged over 65 is expected to increase between 2017 and 2022 by 12.1% within the 10 mile catchment for a proposed extra care scheme. This is a significant increase within the age group, from which the majority of extra care residents are likely to come.



## 2. Executive summary

Estimate undersupply / oversupply of leasehold extra care units (2017)	
	Units
Total estimated need for extra care units	1,827
Existing supply of elderly extra care units	165
Planned supply of elderly extra care units	0
<b>Undersupply of extra care units</b>	<b>1,662</b>

By utilising the evidence in a report by ARCO (Associated Retirement Community Operators) for further extra care housing our assessment of the need for additional extra care units indicates that there is a significant current shortfall of 1,662 units in the catchment.

As identified within this report there are limited existing extra care developments in both the private long leasehold and private rented markets in and around the subject site.

We therefore consider that there would be significant demand for the site from operators and developers seeking development opportunities in this sector which is very active at present .

## 3. Location

### Location

The site is situated at Imberhorne Farm, which is located c. 2.5 miles from the town of East Grinstead, West Sussex.

The site is surrounded by the towns of Crawley c. 9.3 miles to the west and the affluent Royal Tunbridge Wells c. 16.7 miles to the east. Gatwick Airport is situated c. 9.1 miles from the site in the town of Horley.

East Grinstead offers a number of attractions including National Heritage sites as well as a large number of shops, eateries and pubs.

East Grinstead has a mainline train station which is c. 2.2 miles from the site, running services to London Victoria in less than an hour.

The Queen Victoria Hospital is ideally located at c 3.9 miles to the west.

The location of the site within close proximity of East Grinstead, the Queen Victoria Hospital and Gatwick Airport would make this an ideal location for a care home and/or extra care village scheme.









## 5. Demographics

The demographic profile of the 5 mile catchment for care home residents is shown in the table below and highlights the population as at 2017 (the most recent date from which projections can be based) compared with the country as a whole. The population of those aged 65 and over within our catchment area is slightly above the UK national average.

Demographics - Population Estimates 2017				
Age profile	Catchment (5-miles)		UK	
	Number	%	Number	%
Total population	80,284	100%	66,745,948	100%
Age: 55-64	10,907	13.59%	7,859,716	11.77%
Age: 65-74	9,030	11.25%	6,657,134	9.97%
Age: 75-84	4,527	5.64%	3,865,381	5.79%
Age: 85+	2,239	2.79%	1,629,166	2.44%
Source: Experian & Office of National Statistics				

### Population projections

The population estimates indicate that the proportion within the 75+ age category within our market catchment area is due to rise significantly between 2017 and 2037 slightly higher than the UK average increase for the same period.

In the short term, by 2022, the locality is expected to see an increase of 1,777 in the over 75s age group, a 26.3% increase on the 2017 levels which again is 6.5% higher in the same period than the UK as a whole reflecting the older population of East Grinstead and the surrounding area.

There will also be an increase in the percentage of the population aged over 85 albeit

not as markedly as the over 75's, increasing by 13.6% between 2017 and 2022, which is below that of the UK increase in the same period and represents an increase of 353 individuals. This age cohort is the most likely to be the recipient of residential care indicating a significant increase in the number of individual's potential requiring care of some form.

Demographics - Population Projections 2017 - 2037						
Age profile	Age: 75 +		UK % increase	Age 85 +		UK % increase
	Number	% increase		Number	% increase	
2017	6,766	-	-	2,239	-	-
2022	8,543	26.3%	19.8%	2,592	13.6%	16.7%
2027	10,269	20.2%	15.9%	3,088	19.1%	17.5%
2032	11,787	14.8%	11.2%	4,313	39.7%	30.4%
2037	13,654	15.8%	12.4 %	5,308	23.1%	18.8%
Source: Experian & Office of National Statistics						

### Demographics summary

Overall, there is to be a large increase in the ageing population within the catchment area, with the current number of over 75 year olds experiencing a significant percentage increase in the short to medium term above that of the UK predicted average. It is this age cohort which is likely to require care of some form moving forward.

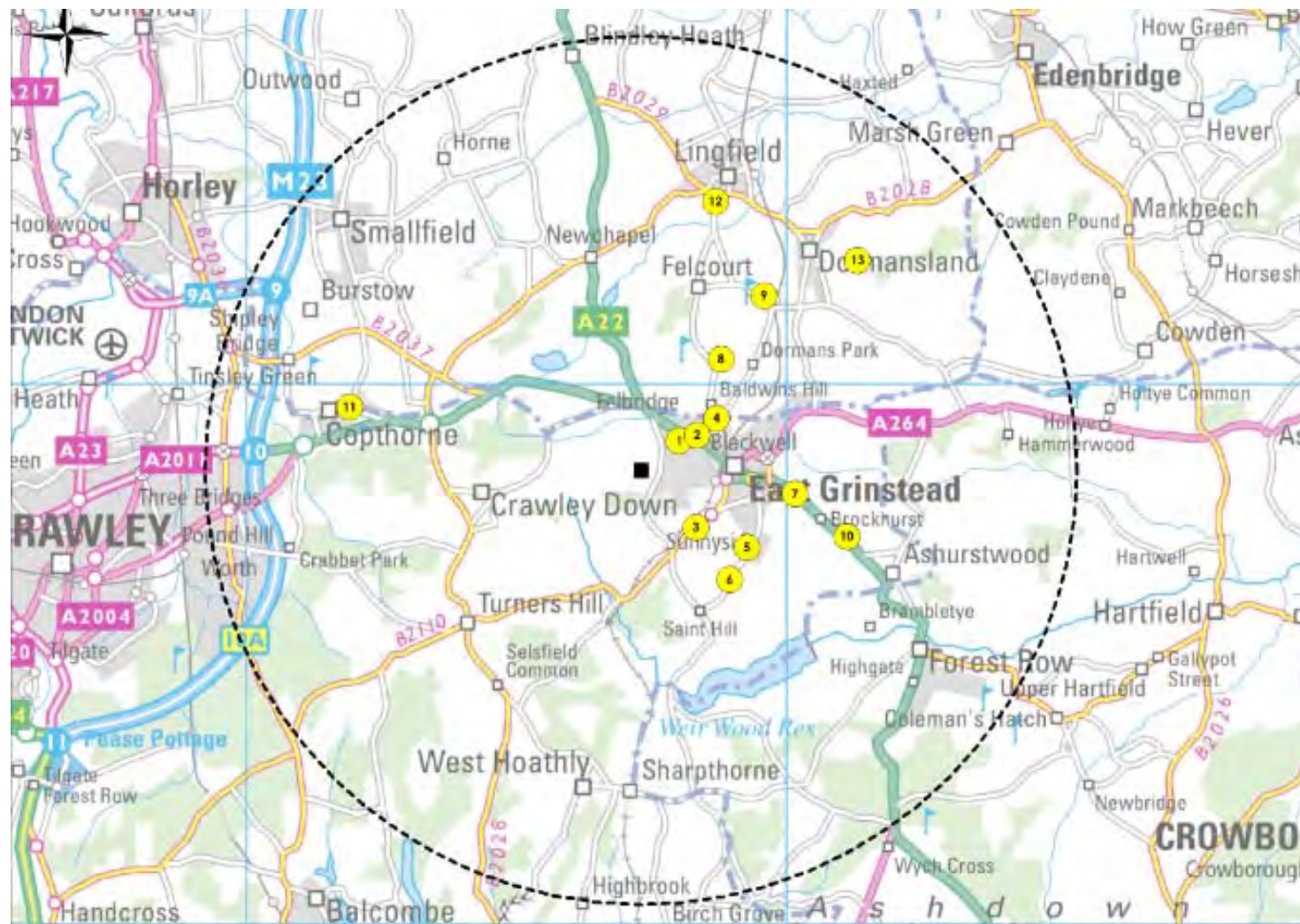
## 6. Existing Care Home Provision

We have investigated the existing and proposed provision of care homes for the elderly within the catchment, and summarise our findings below.

### Care Home Summary

We have identified a total of 13 registered care homes for the elderly that fall within the catchment radius, providing a total of 596 registered beds, see table overleaf. Three homes provide personal care only with a further 10 care homes registered for nursing care. This is a relatively large number of care homes within the catchment area.

Our research identifies that 79% of the existing registered bedrooms provide an en-suite, however only 54% of the existing bedrooms registered for personal care provide an en-suite compared to 87% of nursing beds indicating that the existing personal care homes may be of a older stock and that there is an opportunity to provide a new care home focused on the personal care market.



## 6. Existing Care Home Provision

### Overview of existing competition


In order to develop an understanding of the existing accommodation in the area we have investigated the current provision within our catchment.


Opposite and overleaf we have focused on four existing care homes which we consider may potentially directly compete with a new proposed care home. We have selected these homes either by their proximity to the subject site, the accommodation provided and or the operator of the home.

Silver Court is the closest care home to the subject site. Whilst a slightly older building, the home provides all single accommodation with en suites. Anchor Hanover are a large non-profit organisation with over 50 years of healthcare experience. It will provide strong competition for those seeking a care home close to where they currently reside and it will compete for staff given its close proximity.

Knowle House appears to be a former residential property converted into a nursing home and operated by a private individual. This is an example of an older property without single en suite accommodation throughout the home.

Overview of existing provision						
Category of care	No. of Homes	Beds	Single Beds		En-suites	
			No	%	No	%
Personal care only	3	146	146	100%	79	54%
Nursing care	10	450	416	92%	391	87%
Total	13	596	562	94%	470	79%

Silver Court Care Home, East Grinstead - Anchor Hanover Group				
	Reg. Beds	42	Silver Court is the closest care home to the subject site and is operated by Anchor Hanover Group. The home provides residential care only to 42 elderly people in all single en suite accommodation.	
	En-suites	42		
	Distance	c. 0.5 miles		
	Map Ref:	1		

Knowle House, East Grinstead- RVJ Healthcare				
	Reg. Beds	35	Knowle House is registered for 35 residents requiring nursing care. We believe this is a converted residential property, with 8 'shared' rooms. There are only 14 bedrooms which include an en suite. This type of property is becoming outdated as the minimum standards in a care home increase.	
	En-suites	14		
	Distance	c. 1.1 miles		
	Map Ref:	4		



## 6. Existing Care Home Provision

The next two care homes we have focused on are two very different recently built care homes, both of which are likely to offer a similar standard of accommodation to a new care home on the site. They offer 100% single en-suite bedrooms and target the private pay market.

Mill View is operated by Care UK and is located approximately 1.5 miles south east from the subject site towards Sunnyside. The home is nestled within a residential area obscured from view by a local pub. The property is well located within c. 0.9 miles of the centre of East Grinstead.

Greathed Manor is operated by Pressbeau and is located in Lingfield a village north east of the site. The home is located in a rural area; a Grade II listed 19th Century manor house, tastefully restored and converted into a nursing home in 2008.

Both of these homes, despite their very different environments are likely to target a similar market and will offer competition to a proposed new care home at the subject site.


### Summary

The table on Page 8 summarises the existing provision and highlights that there are only 13 existing care homes in our market catchment providing a total of 596 registered

beds, 94% of existing registered beds are provided in single bedrooms although only 79% of registered beds benefit from an en-suite facility. Only eight of the homes provide 100% single en-suite bedrooms. From our desktop review the quality of the existing provision appears to be relatively high in respect of the accommodation provided, the majority of care homes within the catchment are modern purpose built which we consider will provide a large amount of competition to a proposed new care home. All the properties are within 3.5 miles of the subject site.

The full list of care home provision can be found in Appendix 1 at the end of this report.

Mill View Care Home, East Grinstead – Care UK

	Reg. Beds	70	Mill View appears to be a newly purpose built property providing nursing care in a well presented environment. Accommodation is within single occupancy rooms with en suite facilities throughout. Communal facilities include a coffee shop and cinema which will attract higher fee payers.
	En-suites	70	
	Distance	c. 1.5 miles	
	Map Ref:	5	

Greathed Manor, Lingfield – Pressbeau

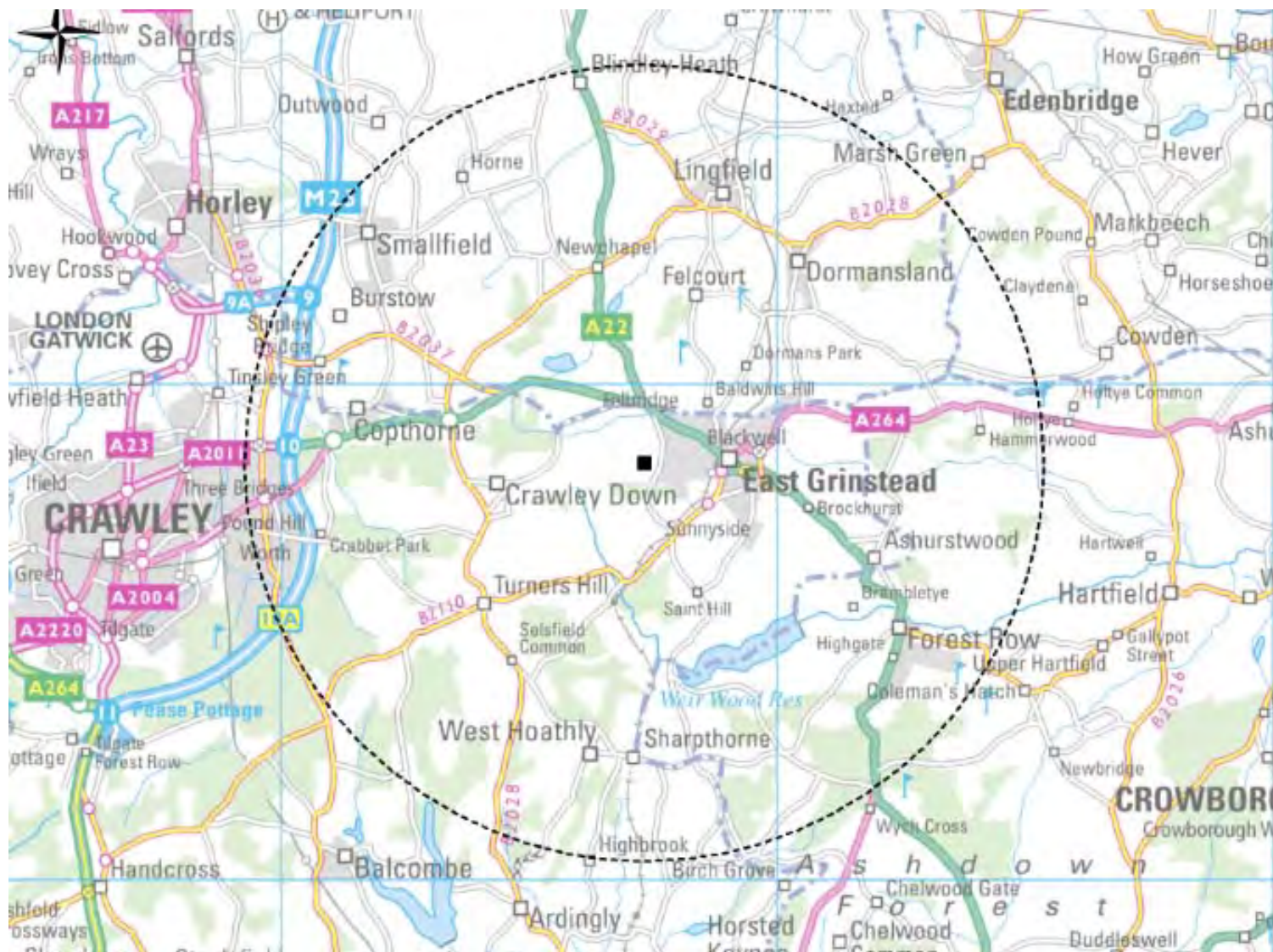
	Reg. Beds	29	The Grade II listed manor house provides 5 acres of grounds in a rural location. Offering 29 single occupancy bedrooms with en suite the home represents a boutique care facility attracting the higher private fee paying market.
	En-suites	29	
	Distance	c. 3.5 miles	
	Map Ref:	13	

## 7. Proposed Care Home Provision

We have investigated the proposed provision of care homes for the elderly within the catchment and summarise our findings below. To report on proposed provision we have researched planning consents and applications submitted between January 2016 and August 2019 using the EGI planning database.

### Pipeline Summary

We have not identified any sites within the catchment where developers or operators are currently looking to bring forward new care home developments or extensions. Therefore there are no additional residential or nursing home beds.



## 8. Estimated Demand

### Need for Additional Care Accommodation

Establishing demand for care services in a particular area is not clear cut and the extent to which research has been conducted into specific geographic areas can vary greatly. We have attempted to determine if there is a shortfall or oversupply of care beds available with the use of LaingBuisson's Age Standardised Demand (ASD). LaingBuisson projects the demand for care home places for older people by applying a formula reflecting the probability of being in a care home in the age bands 65-74, 75-84 and over 85 in the UK to the resident population of an area.

Estimated need for care beds			
Age bracket	LaingBuisson ASD % of population	No of Individuals (2017)	Estimated Need
65 – 74 years	0.59%	9,030	53
75 – 84 years	3.80%	4,527	172
85 plus	14.80%	2,239	331
Total Estimated need for care beds			556

By utilising the ASD percentages, we estimate that there is demand for 556 care home beds within our catchment area, indicating a only a small market size for potential referrals. We have estimated the supply provision on two separate bases, first we have considered the existing supply based on the total registered capacity, secondly we have considered the existing supply based upon those registered bedrooms which benefit from an en-suite facility. We have particularly considered the supply position

based upon those bedrooms with an en-suite facility as over recent years market expectations have been increasing and it is now expected for the private pay market that a bedroom should provide an en-suite and this has been an excepted methodology by a number of adult social care commissioners when assessing the need for additional bed spaces in their authority. We consider those homes which do not provide en-suite facilities may find it harder to operate in competitive markets.

Catchment Area Population & Care Beds (2017)		
	Registered Beds	En-suite Beds only
Total estimated need for care home beds	556	556
Existing supply of elderly care home beds	596	470
Planned supply of elderly care home beds	0	0
Oversupply / undersupply of Existing Care Beds	-40	86

Based on our research we have determined the following:

Due to the large number of existing beds in the catchment, we estimate that there is an oversupply of 40 care homes beds in the catchment area based upon registered capacity. However, when you consider the need based upon those bedrooms providing an en-suite facility, there is in fact an undersupply of 86 care beds.



## 8. Estimated Demand

### Estimated demand based on Population Projections (2022)

Due to the timescales involved in the acquisition of a development site, obtaining planning permission and constructing a proposed care home, we have also considered the population projections for the catchment area in order to estimate the demand in 2022 when a new care home development may be completed.

Catchment Area Population & Care Beds (2022)		
	Registered Beds	En-suite Beds only
Total estimated need for care home beds	764	764
Existing supply of elderly care home beds	596	470
Planned supply of elderly care home beds	0	0
Undersupply of Existing Care Beds	168	294

The above assumes no further planned supply will come through in the timescale and that there will be no closures of older stock.

The increasing population, particularly for individuals over 75 years will invariably increase the demand for care home beds. Based upon the population growth, we estimate that the demand within the catchment will increase from an oversupply of 40 beds to an undersupply of 168 beds. Therefore the current oversupply of care home beds without en suite will reduce, assuming there are no planned schemes and assuming all other things remain equal.

If we only consider those bedrooms with an en-suite facility, the existing undersupply of care beds increases from 86 beds to 294 beds in 2022, indicating a strong demand for more.

We comment that our statistics do not take into account the quality of the existing accommodation beyond the provision of en-suite facilities, some of which is provided in older converted properties. Therefore it is possible a number of the existing registered beds may be unsuitable for the increasing care needs of the population due to small bedrooms, unsuitable layout and configuration and or financial viability given the well published constraints of social care funding and in those circumstances there may be closures with a resultant reduction in the number of beds available.

## 9. Definition of Extra Care Accommodation

### Elderly Care Provision

There are a range of models and definitions in the UK for facilities providing accommodation, supervision and support or care for the elderly. They include the following:

- Continuing to live in family home with a domiciliary care provision
- A 24 hour residential care environment (e.g. a care home or nursing home)
- Sheltered/Retirement Housing accommodation without care provision
- Close Care accommodation linked to care home provision
- Housing with care, variously termed Extra care/Enhanced Sheltered Housing/Assisted Living/Retirement Village accommodation

Sheltered/Retirement Housing generally refers to housing/accommodation that is designed with the elderly or disabled in mind, with a warden or 24 hour call assistance, and possibly communal facilities, such as a residents lounge and laundry. The vast majority of private retirement housing schemes offer apartments and bungalows for sale, either freehold or on a long leaseholds basis. Beyond the call assistance no care is provided to residents.

Close Care units usually constitute a limited number of apartments or bungalows sharing a site with a care home and calling on the latter's operator in emergency situations.

Extra-care and the various other interchangeable names are used by providers and funders to cover forms of accommodation that combine independence with some care and support services available on a single site. The terms are generally

understood to provide more "assistance" than sheltered/retirement housing, but less than that of the registered care home with its 24 hour staffing model.

Care Homes providing personal care give 24 hour social and personal care, care homes with nursing additionally cater for residents with medical/nursing needs and are staffed accordingly. Both services are registered by the CQC, with a strict staffing regime, including prescribed levels of care and nursing services 24 hours a day.

### Extra Care in Retirement Village Form

The Retirement Village concept is identified by the scale of extra care development and mix of services and facilities available. Technically a "village" can be urban or rural and whereas a single block of extra care accommodation may comprise say 60 to 80 apartments the village will accommodate 100 – 250 units and a mix of apartments with perhaps bungalows and or houses. Communal facilities will be larger and more comprehensive as the scale increases and there can be greater opportunities for social interaction where larger schemes can partially open their doors to the local community based around leisure and food and beverage offerings. The care model remains the same across extra care schemes with accommodation being largely for independent living for as long as possible but with the on site care provision being available for growing needs of residents. The care provision must be registered by the CQC.

A Retirement Village will generally consist of mixed accommodation, typically one, two and three bedroom apartments and/or bungalows/cottages, a care facility to create the "continuing care" concept and extensive communal facilities, with a range of activities and services. Those that do not include a care home are more generally referred to as retirement villages. Where a care home is included the term Care Village

## 9. Definition of Extra Care Accommodation

is sometimes used. Units of accommodation are most commonly grouped around country-club-style facilities, sometimes converted from a former manor house, and sometimes purpose built, with a domiciliary care business operating from the site. Facilities at the upmarket end usually include a restaurant, gym, swimming pool, cinema, library, hairdresser. Activities provided can include fitness classes, group outings and entertainment.

Eligible residents can buy their own home and retain their independence, unlike in a retirement or nursing home. Some schemes are wholly for sale, some for rent and others operate on a mixed tenure basis to include shared ownership. Most schemes offer 99-125 year leases. A nominal ground rent often applies in this scenario. Typically a service charge or club fee is payable, which contributes to the communal facilities within the village.

The effect of a care/retirement village is not only to by-pass or very significantly delay an older person's move into a care home, it being only required if very high care dependency levels necessitate a move, but to ease the pressure on health and social services within an area. Those living alone in unfit surroundings for their (even low) mobility needs are more likely to require assistance from the local PCT, doctors practice and or hospital. Down sizing also allows residential properties to be freed up for families, thereby improving the balance in housing stock in an area.

According to a study by the International Longevity Centre carried out in partnership with Audley Retirement, the Extra Care Charitable Trust and sheltered housing managers Retirement Security, people living in these villages are less than half as likely to move to an institutional care home after five years of residence than those in standard housing. As a result pressure is relieved from health and social services, both financially and in terms of other resources.



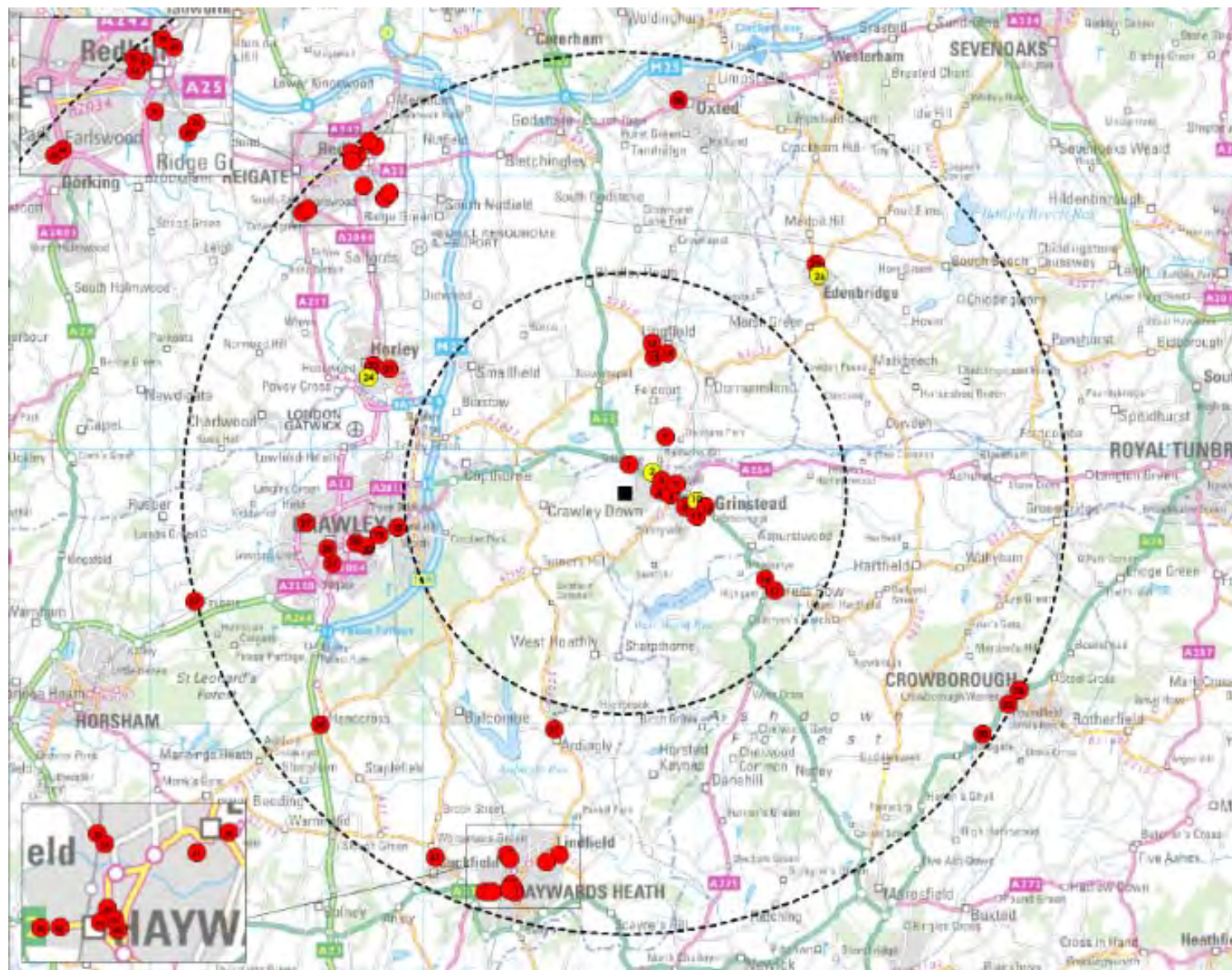
## 10. Existing Provision - Retirement Housing & Extra Care Accommodation

In order to develop an understanding of the existing retirement housing and extra care accommodation in the area we have investigated the current provision of schemes within a 10-mile radius of the site, as identified above.

### Retirement Housing Summary

In total we have identified 57 schemes which provide retirement housing (represented by the red dots on the map adjacent) and extra care (represented by the yellow dots) accommodation within a 10 mile radius of the site, offering private long leasehold, shared ownership or private rent.

In addition to the above existing private retirement housing, we have identified a number of schemes which are for social rent (social landlord). We have not included social rent schemes as this would not be a target market or to maximise the site value. These schemes are not included in the map opposite.



## 10. Existing Provision - Retirement Housing & Extra Care Accommodation


In order to understand the existing accommodation in the area we have investigated the current provision within our catchment.


Opposite we have focused on two existing schemes which could offer competition to a new private retirement housing scheme at the subject site. We have selected these schemes by either their proximity to the subject site, the accommodation provided and or the developer / operator of the scheme.

Felwater Court is the nearest existing scheme to the subject site and provides 21 two bedroom bungalows and apartments on long leasehold. The scheme is relatively old dating back to 1986 and is operated by the not for profit organisation Anchor Hanover.

McIndoe Lodge was developed by Churchill Retirement Living in 2018 and provides assisted living accommodation aimed at the private leasehold market. Located c. 0.9 miles from the subject site, it is one of the newest schemes in the catchment. The development is located within walking distance of East Grinstead town centre and local amenities.

Appendix 2 provides a comprehensive list of all retirement housing schemes.

	Apartments & Bungalows	21	Felwater Court in East Grinstead is an older retirement living scheme developed in 1986.
	Unit mix	2 bedrooms	
	Tenure	Leasehold	The scheme is located just off the A22 London Road and backs on to an industrial park which is not best suited to the residents' requirements.
	Distance	0.6 miles	
	Map Ref:	1	The scheme has an on site resident management staff and offers a communal lounge for residents' use. Felwater Court is retirement housing only and therefore does not offer care packages.

McIndoe Lodge, East Grinstead - Churchill Retirement Living			
	Apartments	49	McIndoe Lodge is a Churchill Retirement Living development for retirement housing only designed specifically for the over 65's.
	Unit mix	1 & 2 bedrooms	
	Tenure	Leasehold	The property includes non-resident management staff, a guest bedroom for hire, resident lounge and garden.
	Distance	0.9 miles	
	Map Ref:	4	



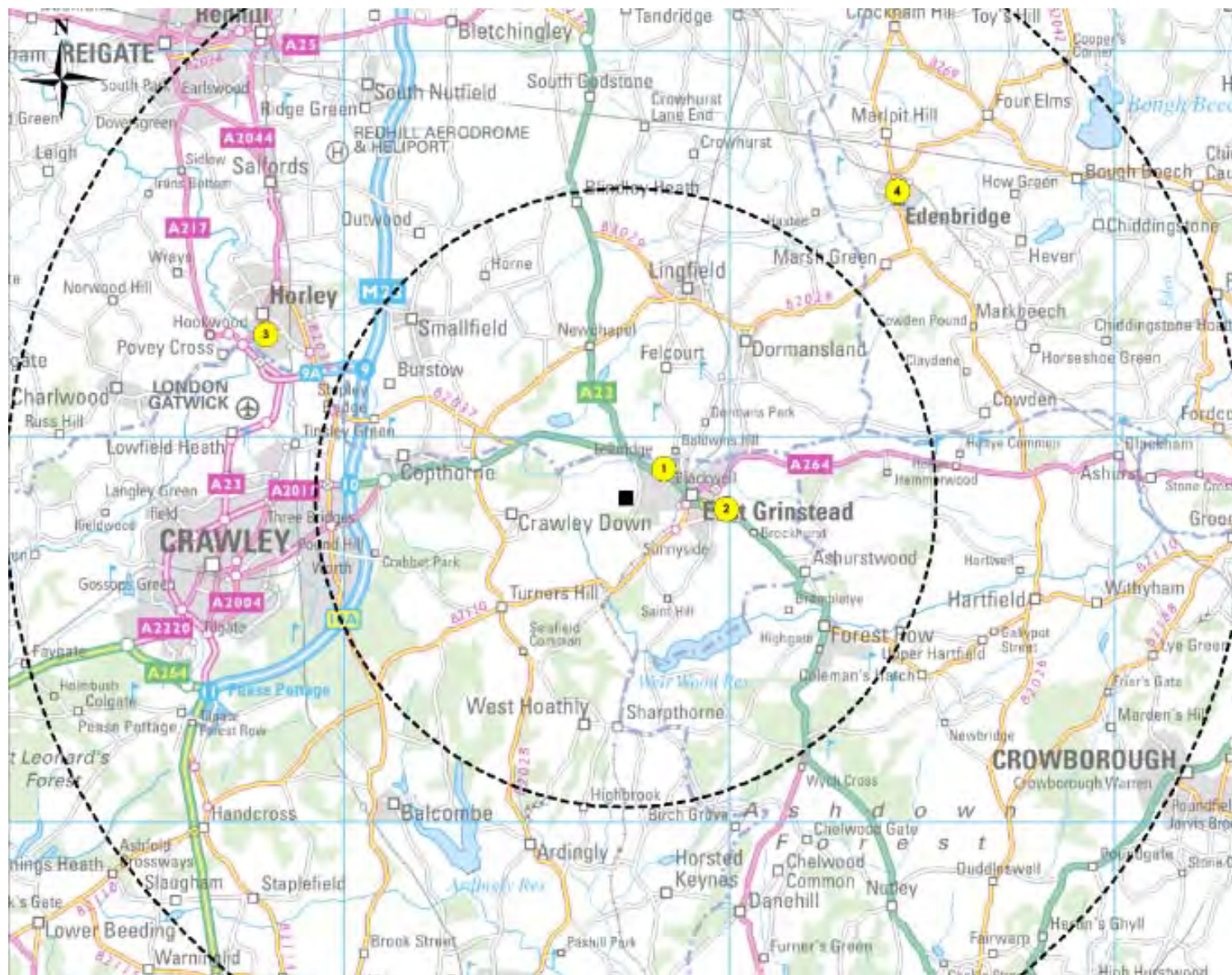
## 11. Existing Provision - Extra Care Accommodation Only

We have identified in this report the difference between sheltered or retirement housing and extra care housing. As we believe the site is well suited to an extra care scheme we have been instructed to develop an understanding of the existing extra care accommodation in the area, separate to that of the retirement accommodation. Again we have investigated the current provision of extra care only schemes within a 10-mile radius of the site, as identified above.

### Extra Care Housing Summary

We have identified only 4 extra care schemes out of the total identified 57 retirement housing schemes within a 10 mile radius of the site, all of which offer private long leasehold tenures only.

In addition to the above existing private extra care housing, we have identified a number of schemes which are for social rent (social landlord). We have not included social rent schemes as this would not be a target market or to maximise the site value. These schemes are not included in the map opposite.





## 11. Existing Provision - Extra Care Accommodation Only

In order to understand the existing extra care accommodation in the area we have investigated the current provision within our catchment.


Opposite we have focused on two existing schemes which could offer competition to a new private extra care housing scheme at the subject site. We have selected these schemes by either their proximity to the subject site, the accommodation provided and or the developer / operator of the scheme.


Stildon Mews is the nearest existing scheme to the subject site but provides 11 close care apartments within the ground of a care home, which is not quite comparable to the presumed extra care scheme which will occupy the subject site.

The next closest scheme is Fairview Court which provides 52 one and two bedroom apartments on long leasehold. The scheme is relatively new developed in 2003 and is operated by Firstport.

Roman Court was developed by McCarthy & Stone in 2005 but is managed by Firstport. The scheme provides enhanced sheltered housing accommodation aimed at the private leasehold market in 52 one and two bedroom apartments. The scheme is located in Edenbridge, Kent but at c 6.7 miles from the subject site could still be competition.

Appendix 3 provides a comprehensive list of all extra care housing schemes.

Fairview Court, East Grinstead - Firstport				
	Apartments	52	Fairview Court in East Grinstead was developed by McCarthy & Stone in 2003. The property is classified as enhanced sheltered housing. The property is managed by Firstport, with care packages provided by Guardian Management Services.	
	Unit mix	1 & 2 bedrooms		
	Tenure	Leasehold		
	Distance	1.6 miles	The scheme has an on site 24/7 care team and offers a communal lounge and restaurant for residents' use.	
	Map Ref:	2	Fairview Court is well located within easy walking distance of East Grinstead High Street with its various amenities.	

Roman Court, Edenbridge - Firstport				
	Apartments	52	Roman Court is an enhanced sheltered housing scheme developed in 2005 by McCarthy & Stone but managed by Firstport with care packages provided by Allied Healthcare.	
	Unit mix	1 & 2 bedrooms		
	Tenure	Leasehold		
	Distance	6.7 miles	Management staff are on site 24/7 and a Careline alarm service is provided. Facilities include a dining room and resident lounge.	
	Map Ref:	4	The scheme is well located at the top of Edenbridge High Street.	

## 12. Proposed Retirement Housing and Extra Care Accommodation

We have investigated the proposed provision of retirement housing and extra care schemes within the catchment and have summarised our findings below.

To report on proposed provision we have researched planning consents and applications submitted between January 2016 and August 2019 using the EGI planning database.

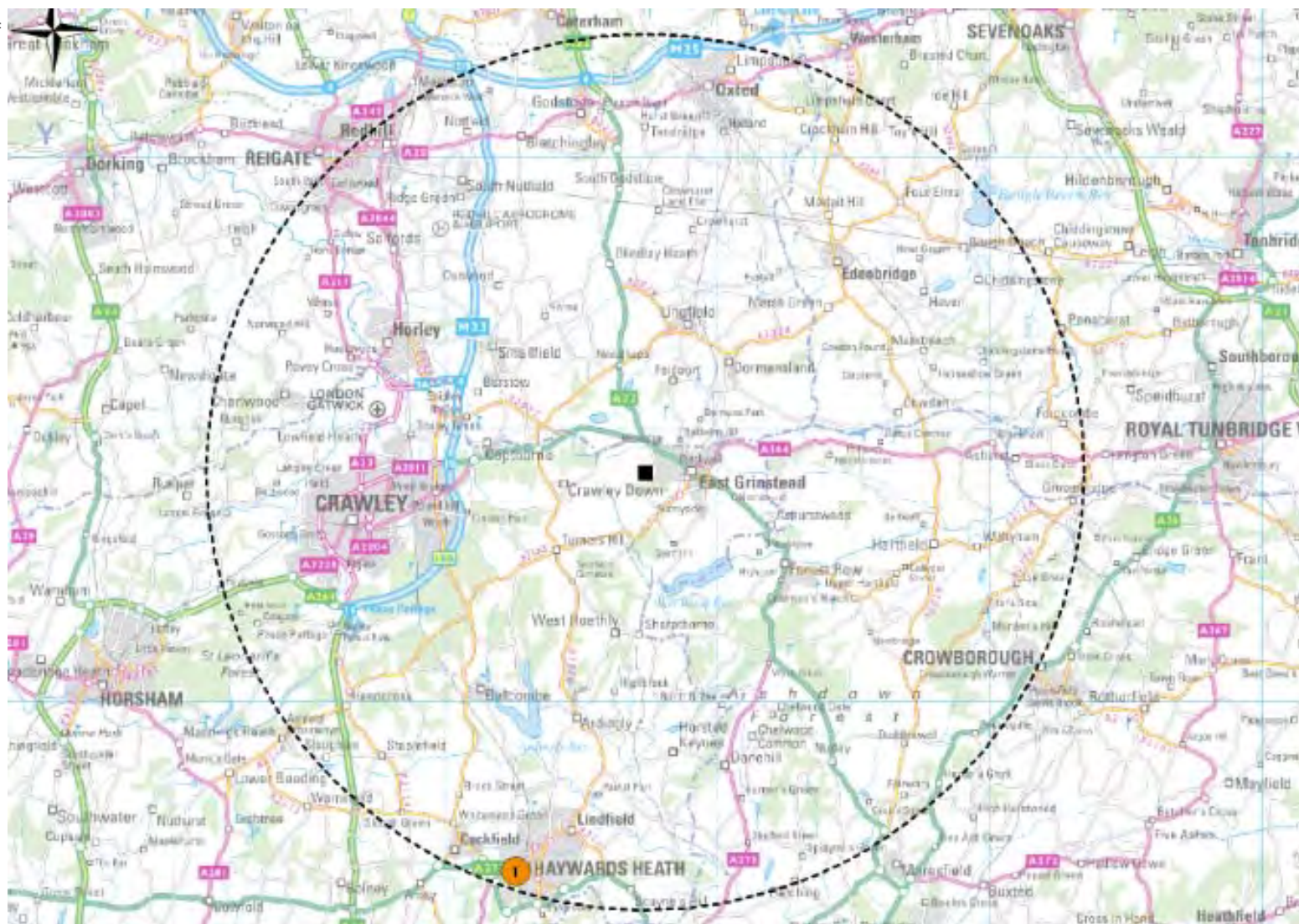
### Pipeline Summary

We have identified only one site where a developer/operator is currently looking to bring forward a new retirement housing development for the private long leasehold marketing within the 10 mile catchment.

Our research identified that Renaissance Retirement Limited achieved planning consent in April 2018 for 15 sheltered residential units at 23-25 Bolnore Road, Haywards Heath.

The application is for *the demolition of a residential unit at 25 and garage at 23 Bolnore Road and redevelopment to comprise 8 retirement cottages and 7 retirement apartments, including communal facilities, access, car parking and landscaping.*

We believe this is an extension of the existing retirement village Fleur De Lis, Bolnore Rd, Haywards Heath RH16 4AN and may well have already been completed.



## 13. Demand for Extra Care Accommodation

Establishing demand for care services in a particular area is not clear cut and the extent to which research has been conducted into specific geographic areas can vary greatly.

Nationally the amount of extra care stock available for private sale/outright ownership is significantly below the social housing rental stock as demonstrated by the table below.

The table highlights that only 32% of the existing extra care stock in England represents accommodation available for outright sale. While the voluntary sector continued to develop extra care schemes for rental after the financial crash and housing recession, the development of for sale/long leasehold stock slowed.

Region	Letting	Sale	All	%age for letting
East Midlands	2,944	1,736	4,680	63%
East of England	5,161	1,455	6,616	78%
London	5,335	601	5,936	90%
North East	2,389	668	3,057	78%
North West	5,618	2,629	8,247	68%
South East	6,121	5,104	11,225	55%
South West	4,479	3,036	7,515	60%
West Midlands	7,513	4,041	11,554	65%
Yorkshire & The Humber	4,279	1,329	5,608	76%
<b>England</b>	<b>43,870</b>	<b>20,568</b>	<b>64,438</b>	<b>68%</b>

However, recent figures suggest that there is increasing confidence on behalf of private sector developers and a growing demand from potential leaseholders, which looks set to support growth in the number of privately-owned extra care units. There is revised interest from private developers for whom a clearer business case for this model of housing is becoming identifiable.

The supply of extra care properties close to and within the catchment is low with only four schemes available.

Across the UK there are only 64,000 dwellings at present loosely termed extra care. 5% of over 65's live in specialist accommodation but only 1% live in retirement communities that offer a large range of facilities and services. Instead they live in small sheltered housing developments that lack the full range of facilities and care that may not therefore suit their needs as they get older and more frail.

Evidence to support a need for further extra care housing can be found in a report by ARCO (Associated Retirement Community Operators) who estimate that there are a mere 50,000 (0.5%) of the UK's older people living in retirement communities, compared with 5.6% in the USA, 5.25% in Australia and 5% in New Zealand. <sup>1</sup>

Laingbuisson is the UK's leader in Healthcare research and information, The above is taken from its Extra Care and Retirement Communities 14 Edition report. We therefore believe and are aware that authoritative industry estimates believe a demand for extra care housing will be closer to that of Australia, New Zealand and USA data. We have therefore attempted to determine if there is a shortfall or oversupply of extra care facilities available by using the 5% found in New Zealand as conservative assessment based on three comparable countries of the 65+ population requiring this type of facility.

<sup>1</sup> Laing & Buisson, *Community Care Market News*, (p. 4-5), (June 2015).. <sup>2</sup> Laing & Buisson, *Community Care Market News*, (p. 4-5), (June 2015).

<sup>1</sup> Laingbuisson's Extra Care and Retirement Communities UK Market Report 2017



## 13. Demand for Extra Care Accommodation

By using this 5% of the over 65 population predicted in the catchment in 2017 we have determined the following:

Catchment Area Population & Extra Care Units (2017)	
Catchment Area Population of 65+	63,261
Extra Care Housing Units Required	3,163

Based upon the population profile of our catchment area, there is an estimated 3,163 extra care units required within the catchment as at 2017.

Currently only 77% of older people in England are owner-occupiers, and therefore on the assumption that these individuals would seek to continue to be owner-occupiers, this therefore lowers the potential demand for private leasehold extra care housing.

Further, we have identified that a number of the units will not be solely occupied but cohabited and that for every 40 persons seeking extra care accommodation there is in fact a need for only 30 units (75%). This therefore also lowers our requirement for extra care units.

Catchment Area Population & Extra Care Units (2017)	
Extra Care Units Required	3,163
Demand for private leasehold units (77%)	2,436
Allowance for cohabitation (75%)	1,827
Private Leasehold Extra Care Units Required	1,827

By using these figures we have determined the following:

Undersupply of Private Leasehold Extra Care Schemes (2017)	
Private Leasehold Extra Care Units Required	1,827
Existing supply of extra care units	165
Planned supply of extra care units	0
Undersupply of Extra Care Units	1,662

There is an estimated undersupply of 1,662 extra care units for the private market within the catchment area. We therefore consider that there is a significant under supply of private leasehold units currently available, with the shortfall only going to grow as the population ages and increases.

### Estimated demand based on Population Projections (2022)

Due to the timescales involved in the acquisition of a development site, obtaining planning permission and constructing the proposed extra care scheme, we have also considered the population projections for the catchment area in order to estimate the demand in 2022.

Estimated need for additional extra care housing units (2022)	
Catchment Area Population of 65+	70,887
Private Leasehold Extra Care Units Required	2,047
Existing supply of extra care units	165
Planned supply of extra care units	0
Undersupply of Extra Care Units	1,882

The above highlights that the existing undersupply of extra care units is going to increase by approximately 13.2% between 2017 and 2022.

## 13. Demand for Extra Care Accommodation

Combined with this shortfall is the slow process of the owners of these units moving on. For example in a Richmond Village scheme owners of the properties are expected to reside within their property for on average 10 years.

Should purchasers be required to wait a number of months or years to purchase an extra care property within this area, their current residence (usually the family home) could further become unsuitable for their needs and this can result in more frequent hospital admissions, a need for greater support from the social and health communities and perhaps eventually a care or nursing home placement.

Older sole occupants in large family homes increase the pressure on housing. Where elderly occupants are living within 3 - 4 bedroom houses they don't require, young families are unable to find suitable accommodation. If elderly purchasers are offered more choice in extra care living these larger family sized properties can be brought to the market.

A need for choice must be taken into account. For many purchasers seeking retirement living in extra care schemes this should and most likely will be their final move. An elderly purchaser should have the same amount of choice of the type of property they would wish to live in as a young family.

The above is without taking into account the possibility that some of the older stock presently available for purchase could become obsolete in the future with the demands of those purchasing increasing and the facilities which are provided no longer being up to modern standards.

In conclusion there is predicted to be a significant increase in the over 65's population and in the next 10 years and there appears to be a significant shortfall of extra care units within the 10 mile catchment area. A new development on the subject site will not fully solve the problem of undersupply within the area but will make a positive contribution.

# About Avison Young

Avison Young is a leading UK property adviser providing a comprehensive range of business and property solutions to UK and international owners, occupiers, investors, lenders and developers.

Avison Young's Healthcare team combines in-depth market knowledge with commercial acumen to provide creative, tailored business solutions across the healthcare sector and possesses a vast array of experience including previous high level responsibilities with care home groups.

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# **Appendix 1**

## **Summary of existing care home provision**

Care Homes										
Map Ref.	Name	Address	Town	Postcode	Provider Name	Service Type	Reg. Beds	Single Beds	Shared Beds	En-suite Beds
1	Silver Court	Halsford Lane, East Grinstead	West Sussex	RH19 1PD	Anchor Hanover Group	Residential homes	42	42	0	42
2	Brendoncare Stildon	Dorset Avenue, East Grinstead	West Sussex	RH19 1PZ	Brendoncare Foundation(The)	Nursing homes	32	32	0	32
3	Acorn Lodge	Turners Hill Road, East Grinstead	West Sussex	RH19 4LX	Acorn Health Care Limited	Nursing homes	40	32	4	27
4	Knowle House Nursing Home	Lingfield Road, East Grinstead	West Sussex	RH19 2EJ	RVJ Healthcare Ltd	Nursing homes	35	19	8	14
5	Mill View	Sunnyside Close, East Grinstead	West Sussex	RH19 4AT	Care UK Community Partnerships Ltd	Nursing homes	70	70	0	70
6	Beechcroft Care Centre	West Hoathly Road, East Grinstead	West Sussex	RH19 4ND	SHC Clemsfold Group Limited	Nursing homes	30	30	0	30
7	Littlefair	Warburton Close, East Grinstead	West Sussex	RH19 3TX	Littlefair Care Home Limited	Residential homes	41	41	0	25
8	Charters Court Nursing and Residential Home	Charters Towers, East Grinstead	West Sussex	RH19 2JG	RV Care Homes Limited	Nursing homes	60	60	0	60
9	College of St Barnabas	Blackberry Lane, Lingfield	Surrey	RH7 6NJ	College Of St. Barnabas(The)	Nursing homes	28	28	0	28
10	Truscott Manor Care Home	Hectors Lane, East Grinstead	West Sussex	RH19 3SU	Frannan International Limited	Nursing homes	39	29	5	14
11	Francis Court	Borers Arms Road, Crawley	West Sussex	RH10 3LQ	Care UK Community Partnerships Ltd	Nursing homes	87	87	0	87
12	Orchard Court	East Grinstead Road, Lingfield	Surrey	RH7 6ET	SCC Adult Social Care	Residential homes	63	63	0	12
13	Greathed Manor Nursing Home	Ford Manor Road, Lingfield	Surrey	RH7 6PA	Pressbeau Limited	Nursing homes	29	29	0	29



## **Appendix 2**

Summary of existing retirement housing &  
extra care provision

Retirement Housing & Extra Care										
Name	Address	County	Postcode	Developer (Manager)	Type	Units	Unit Type	Tenure	Distance (miles)	Year Developed
Felwater Court	Stream Park, Felbridge, East Grinstead	West Sussex,	RH19 1QR	Anchor Hanover	Retirement housing	21	2 bedroom apartments and bungalows	Leasehold	0.6	1986
Stildon Mews	London Road, East Grinstead,	West Sussex,	RH19 1PZ	The Brendoncare Foundation	Enhanced Sheltered Housing	11	2 bedroom apartments	Leasehold	0.7	2004
Ashdown Gate	London Road, East Grinstead,	West Sussex,	RH19 1FG	FirstPort	Retirement housing	38	1 bedroom studio apartments	Leasehold & Market Rent	0.8	1987
McIndoe Lodge	Garland Court, Garland Road, East Grinstead	West Sussex,	RH19 1DN	Churchill Retirement Living	Retirement housing	49	1 & 2 bedroom apartments	Leasehold	0.9	2018
William Lodge	Gloucester Road, Malmesbury,	Wiltshire	SN16 0BT	Churchill Retirement Living	Retirement housing	26	1 & 2 bedroom apartments	Leasehold	0.9	2018
St James Court	St James Road, East Grinstead	West Sussex,	RH19 1DB	FirstPort	Retirement housing	28	1 & 2 bedroom apartments	Leasehold	1.0	2002
Meadow Court	St Agnes Road, East Grinstead	West Sussex,	RH19 3GF	FirstPort	Retirement housing	40	1 & 2 bedroom apartments	Leasehold	1.0	2005
Forest Lodge	Portland Road, East Grinstead	West Sussex,	RH19 4EZ	FirstPort	Retirement housing	51	1 & 2 bedroom apartments	Leasehold	1.4	1991
Charters Village	Felcourt Road, East Grinstead	West Sussex,	RH19 2JG	Retirement Villages Group Ltd	Retirement housing	88	Apartments & bungalows	Leasehold and Rent (market)	1.6	Unknown
Fairview Court	Fairfield Road, East Grinstead,	West Sussex	RH19 4HD	FirstPort	Enhanced Sheltered Housing	52	1 & 2 bedroom apartments	Leasehold	1.6	2003

Retirement Housing & Extra Care										
Name	Address	County	Postcode	Developer (Manager)	Type	Units	Unit Type	Tenure	Distance (miles)	Year Developed
Great House Court	Fairfield Road, East Grinstead,	West Sussex	RH19 4HE	Kingsdale Group	Retirement housing	24	1 & 2 bedroom apartments	Leasehold	1.6	1989
The Fallows	Fairfield Road, East Grinstead	West Sussex	RH19 4QD	McCarthy & Stone Management Services	Retirement housing	23	2 bedroom apartments	Leasehold	1.6	2012
Lincolns Mead	Newchapel Road, Lingfield,	Surrey	RH7 6TA	Anchor Hanover	Age Exclusive Housing	16	2 bedroom apartments	Leasehold	3.2	1989
St Christophers Court	High Street, Lingfield	Surrey	RH7 6AA	Grange Property Management	Retirement housing	16	1 bedroom apartments	Leasehold	3.3	1988
Deacon Court	Godstone Road, Lingfield,	Surrey	RH7 6SA	Anchor Hanover	Age Exclusive Housing	8	2 bedroom apartments	Leasehold	3.4	1989
Kennard Court	Riverside, Forest Row	East Sussex	RH18 5HZ	Grange Property Management	Retirement housing	21	1 & 2 bedroom apartments	Leasehold	3.7	1991
Oakwood Park	Hartfield Road, Forest Row	East Sussex	RH18 5DZ	Anchor Hanover	Retirement housing	38	1 & 2 bedroom apartments	Leasehold	4.0	1989
St Ives	Belloc Close, Pound Hill, Crawley	West Sussex	RH10 3RY	Anchor Hanover	Age Exclusive Housing	18	1 bedroom apartments	Leasehold	5.2	1989
Laker Court	Gales Drive, Crawley,	West Sussex	RH10 1QB	FirstPort	Retirement housing	30	1 & 2 bedroom apartments	Leasehold	5.8	2001
Pembroke Court Retirement Apartments	Crawley Leisure Centre, Haslett Avenue, Crawley,	West Sussex	RH10 1TS	Fairview New Homes Ltd	Retirement housing	12	1 & 2 bedroom apartments	Leasehold	6.0	2008



Retirement Housing & Extra Care										
Name	Address	County	Postcode	Developer (Manager)	Type	Units	Unit Type	Tenure	Distance (miles)	Year Developed
Roslan Court	Rosemary Lane, Horley,	Surrey	RH6 9XZ	FirstPort	Retirement housing	32	1 & 2 bedroom apartments	Leasehold	6.1	1989
Choda House	Commonwealth Drive, Three Bridges, Pembroke Park, Crawley	West Sussex	RH10 1AY	Unknown	Retirement housing	45	1 & 2 bedroom apartments	Leasehold	6.1	2007
Mitchell Court	Victoria Road, Horley	Surrey	RH6 7FB	Anchor Hanover	Retirement housing	43	1 & 2 bedroom apartments	Leasehold	6.3	1989
Wavertree Court	Massetts Road, Horley	Surrey	RH6 7BP	FirstPort	Enhanced Sheltered Housing	50	1 & 2 bedroom apartments	Leasehold	6.5	2006
Eadhelm Court	Penlee Close, Edenbridge,	Kent	TN8 5FD	McCarthy & Stone Management Services	Retirement housing	34	1 & 2 bedroom apartments	Leasehold	6.6	2012
Roman Court	1 High Street, Edenbridge, Kent,	Kent	TN8 5LW	FirstPort	Enhanced Sheltered Housing	52	1 & 2 bedroom apartments	Leasehold	6.7	2005
Cedar Lodge	53-55 Brighton Road, South Gate, Crawley,	West Sussex	RH11 8TZ	Anchor Hanover	Retirement housing	38	1 & 2 bedroom apartments	Leasehold	6.8	1987
Homethorne House	Oak Road, off Springfield Road, Southgate, Crawley	West Sussex	RH11 8AE	FirstPort	Retirement housing	35	1 & 2 bedroom apartments	Leasehold	6.9	1987
Millfield Court	The Mardens, Ilfield Drive, Crawley	West Sussex	RH11 0AB	FirstPort	Retirement housing	52	1 & 2 bedroom apartments	Leasehold	7.3	Unknwon
Harvest Close	Luxford Road, Lindfield	West Sussex	RH16 2LW	FirstPort	Retirement housing	31	1 & 2 bedroom apartments & bungalows	Freehold & Leasehold	8.3	1987

Retirement Housing & Extra Care										
Name	Address	County	Postcode	Developer (Manager)	Type	Units	Unit Type	Tenure	Distance (miles)	Year Developed
St Nicholas Court	Lindfield, Lindfield	West Sussex	RH16 2EY	FirstPort	Retirement housing	15	1 & 2 bedroom bungalows	Leasehold	8.6	1984
Mill Hill Close	Haywards Heath,	West Sussex,	RH16 1NY	Anchor Hanover	Retirement housing	28	1 & 2 bedroom apartments	Leasehold	8.6	1967
Oaklands Park	Brambletye Park Road, Redhill,	Surrey	RH1 6RN	FirstPort	Retirement housing	113	2 bedroom apartments, bungalows and cottages	Leasehold & Freehold	8.6	1989
Barnard Gate	Balcombe Road, Haywards Heath	West Sussex	RH16 1PQ	Anchor Hanover	Retirement housing	20	1 & 2 bedroom apartments	Leasehold	8.6	1987
The Forge	Windmill Platt, Handcross,	West Sussex	RH17 6BS	Anchor Hanover	Age Exclusive Housing	21	1 bedroom apartments & bungalows	Leasehold	8.7	1986
Linnell Park	Crofters Close, off Oaklands Drive, Redhill,	Surrey	RH1 6RB	Millstream Management Services	Age Exclusive Housing	22	2 bedroom bungalows	Leasehold	8.7	2003
Turnpike Court	Hett Close, Ardingley, Haywards Heath,	West Sussex	RH17 6GQ.	Cognatum Estates	Retirement housing	19	2 bedroom apartments and cottages	Leasehold	8.9	2003
Sycamore Court	Hoskins Road, Oxted,	Surrey	RH8 9JQ	Sycamore Court Ltd	Retirement housing	35	1 & 2 bedroom apartments	Leasehold	9	1992
Woodlands Court	Woodlands Road, Redhill	Surrey	RH1 6EX	Raven Housing Trust	Retirement housing	16	1 & 2 bedroom apartments	Rent (Social) & Leasehold	9.2	1960
Heath Court	Heath Road, Haywards Heath,	West Sussex	RH16 3AF	FirstPort	Retirement housing	47	1 & 2 bedroom apartments	Leasehold	9.3	1998

Retirement Housing & Extra Care										
Name	Address	County	Postcode	Developer (Manager)	Type	Units	Unit Type	Tenure	Distance (miles)	Year Developed
Tower House & Close	London Road, Cuckfield, Haywards Heath	West Sussex	RH17 5EQ	Retirement Lease Housing Association	Retirement housing	30	1 & 2 bedroom apartments	Leasehold	9.3	1977
Church Court	Church Road, Haywards Heath,	West Sussex	RH16 3UE	Home Group Ltd	Retirement housing	32	1 & 2 bedroom apartments	Leasehold	9.3	1985
Clover Court	Church Road, Haywards Heath	West Sussex	RH16 3UF	FirstPort	Retirement housing	45	1 & 2 bedroom apartments	Leasehold	9.3	1998
Petlands Lodge	Church Road, Haywards Heath,	West Sussex	RH16 3NY	Churchill Retirement Living	Retirement housing	43	1 & 2 bedroom apartments	Leasehold	9.4	2016
Hurst Place	Kleinwort Close, Butlers Green Road, Haywards Heath	West Sussex	RH16 4XH	Anchor Hanover	Retirement housing	68	1 & 2 bedroom apartments	Leasehold	9.5	2016
Fleur-de-Lis Haywards Heath	Bolnore Road, Haywards Heath,	West Sussex	RH16 4BA	Renaissance Retirement	Age Exclusive Housing	34	1 & 2 bedroom apartments	Leasehold	9.6	2016
Forthcoming Development	32-42 Prices Lane, Reigate,	Surrey	RH2 8AX	Churchill Retirement Living	Retirement housing	31	1 & 2 bedroom apartments	Leasehold	9.7	
Ridings Court	Prices Lane, Reigate,	Surrey	RH2 8BP	FirstPort	Retirement housing	30	1 & 2 bedroom apartments	Leasehold	9.7	2008
Holmesdale Manor	89 Ladbroke Road, Redhill,	Surrey	RH1 1NX	Kingsdale Group	Retirement housing	41	1 & 2 bedroom apartments	Leasehold	9.7	2004
Nevill Close	Beacon Road, Crowborough	East Sussex	TN6 1UW	Sussex Housing & Care	Retirement housing	7	2 bedroom bungalows	Shared Ownership	9.7	1983



Retirement Housing & Extra Care										
Name	Address	County	Postcode	Developer (Manager)	Type	Units	Unit Type	Tenure	Distance (miles)	Year Developed
Douglas Houghton House	4 Oxford Road, Redhill	Surrey	RH1 1DT	Unknown	Age Exclusive Housing	12	1 bedroom apartments	Leasehold	9.8	unknown
Wilderness Park	Beacon Close, Crowborough,	East Sussex	TN6 1DQ	FirstPort	Retirement housing	9	1 & 2 bedroom apartments	Freehold & Leasehold	9.8	1988
Chestnut Mead	Oxford Road, Redhill	Surrey	RH1 1DR	Raven Housing Trust	Retirement housing	20	1 & 2 bedroom apartments	Leasehold	9.9	Unknown
Lewis Court	65 Linkfield Lane, Redhill,	Surrey	RH1 1DU	FirstPort	Retirement housing	23	1 & 2 bedroom apartments	Leasehold	9.9	2007
Redlin Court	1-3 Linkfield Lane, Redhill,	Surrey	RH1 1TB	FirstPort	Retirement housing	47	1 & 2 bedroom apartments	Leasehold	9.9	1989
Link House	Eridge Road, Crowborough	East Sussex	TN6 2SL	FirstPort	Retirement housing	8	1 & 2 bedroom apartments	Leasehold	9.9	1990
Durrants Village	Faygate, Horsham	West Sussex	RH12 4SJ	Inspired Villages	Retirement housing	154	2 & 3 bed apartments	Leasehold	10	2004

## **Appendix 3**

### Summary of extra care housing provision

Extra Care Housing										
Name	Address	County	Postcode	Developer (Manager)	Type	Units	Unit Type	Tenure	Distance (miles)	Year Developed
Stildon Mews	London Road, East Grinstead,	West Sussex,	RH19 1PZ	The Brendoncare Foundation	Enhanced Sheltered Housing	11	2 bedroom apartments	Leasehold	0.7	2004
Fairview Court	Fairfield Road, East Grinstead,	West Sussex	RH19 4HD	FirstPort	Enhanced Sheltered Housing	52	1 & 2 bedroom apartments	Leasehold	1.6	2003
Wavertree Court	Massetts Road, Horley	Surrey	RH6 7BP	FirstPort	Enhanced Sheltered Housing	50	1 & 2 bedroom apartments	Leasehold	6.5	2006
Roman Court	1 High Street, Edenbridge, Kent,	Kent	TN8 5LW	FirstPort	Enhanced Sheltered Housing	52	1 & 2 bedroom apartments	Leasehold	6.7	2005



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## **Summary of Ecological Works**

### **Land at Imberhorne Farm East Grinstead**

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**LIABILITIES:**

Whilst every effort has been made to guarantee the accuracy of this report, it should be noted that living animals and plants are capable of migration/establishing and whilst such species may not have been located during the survey duration, their presence may be found on a site at a later date.

This report provides a snapshot of the species that were present at the time of the survey only and does not consider seasonal variation. Furthermore, where access is limited or the site supports habitats which are densely vegetated only dominant species maybe recorded.

The recommendations contained within this document are based on a reasonable timeframe between the completion of the survey and the commencement of any works. If there is any delay between the commencement of works that may conflict with timeframes laid out within this document, or have the potential to allow the ingress of protected species, a suitably qualified ecologist should be consulted.

It is the duty of care of the landowner/developer to act responsibly and comply with current environmental legislation if protected species are suspected or found prior to or during works.

## **1.0 Introduction**

### **Background**

1.1 The Ecology Partnership was commissioned by Welbeck Land to undertake a site assessment and preliminary ecological appraisal on land at Imberhorne Farm in 2016. Since the initial assessment, a range of species specific works and updated PEAs have been conducted in 2016, 2017, 2018 and 2019. This report provides a summary of the ecological works conducted over the past 4 years.

1.2 This report comprises the:

- Assessment methodologies (Section 2);
- Desk Top Results (Section 3);
- PEA / Habitats (section 4);
- Bats (section 5);
- Reptiles (section 6);
- Dormice (section 7);
- GCNs (section 8);
- Badgers (section 9);
- Breeding Birds (section 10)
- Review (section 11);
- Recommendations (section 12);
- Conclusions (Section 13).

### **Site Context and Status**

1.3 The site is situated to the west of Imberhorne Lane on the western edge of East Grinstead, West Sussex (TQ3719138623). The site covers approximately 74ha and comprises arable fields with field margins, bounded by hedgerows, ditches, treelines and deciduous woodland. The site borders further arable land to the west, low density housing to the east and woodland to the north and south.

1.4 The approximate red line boundary of the site is shown in Figure 1. This was also the approximate survey boundary.



*Figure 1: Approximate location of the site boundary*

### **Description of Proposed Development**

- 1.5 The proposals for the site include the construction of residential housing units with associated infrastructure and mixed-use elements, including a new school development and care village. A SANG will be created on the western aspect of the site. The southern field will not be developed.

### **Planning Policies**

- 1.6 Any application will be assessed against the policy guidance provided by the National Planning Policy Framework, as well as relevant planning policies from the 'Mid Sussex



District Plan 2014-2031' contains local policies relating to nature conservation. The main policies drawn from the report, which are relevant to the site, are indicated below;

- DP17: Ashdown Forest Special Protection Area (SPA) and Special Area of Conservation (SAC);
- DP 37: Trees, Woodland and Hedgerows;
- DP 38: Biodiversity.

1.7 The reports have been produced with reference to current guidelines for preliminary ecological appraisal (CIEEM 2017) and in accordance with BS 42020:2013 Biodiversity – Code of Practice for Planning and Development.

## 2.0 Methodology

### Desktop Study

2.1 A desktop study search was completed using an internet-based mapping service ([www.magic.gov.uk](http://www.magic.gov.uk)) for statutory designated sites and an internet-based aerial mapping service ([maps.google.co.uk](http://maps.google.co.uk)) was used to understand the habitats present in and around the survey area and habitat linkages and features (ponds, woodlands etc.) within the wider landscape.

2.2 A 2km data search was requested from Sussex Biodiversity Record Centre. A search of 2km around the redline boundary, for protected species, statutory and non-statutory designated sites, was requested and the results of which have been processed in Table 2.

### Preliminary Ecological Appraisal

2.3 A phase 1 habitat survey, which included assessing the site for the potential for protected species was undertaken on 27<sup>th</sup> April 2016. An extended preliminary ecological appraisal

was undertaken on 15<sup>th</sup> February 2018 with a further survey covering the extended area of the site to the northwest was surveyed on 17<sup>th</sup> July 2018.

### Protected Species Assessments

- 2.4 Standard methods of search and measures of presence, or likely absence based on habitat suitability were used for bats in trees and buildings (Collins 2016), breeding birds<sup>1</sup>, dormice (Bright *et al.* 2006), great crested newts (ARG 2010), reptiles (Froglife 2015), and badgers (Cresswell *et al.* 1990). The timings of each of the specific surveys are listed below.

**Table 1 Protected Species Surveys**

Faunal Group	Survey Methodology	Date of Surveys	Guidance
Bats – tree inspection	As part of the habitat surveys, any trees supporting particular features likely to be of value to bats, such as splits, cracks, rot holes, coverings of ivy, peeling bark or similar, were recorded.  The potential for the trees to support roosting bats has been assessed in accordance with the criteria set out in the Bat Conservation Trust guidelines (BCT, 2012)	April 2016	Bat Surveys – Good Practice Guidelines’ (Bat Conservation Trust, 2016);
Bats – activity surveys	Several dusk surveys and the use of remote recording (anabat surveys) across the site using transect methods and stops for recording activity as per Bat Conservation Trust guidelines (BCT, 2016)	17 <sup>th</sup> August 2016 8 <sup>th</sup> September 2016  Anabat Express was deployed on site and recorded data from the 25 <sup>th</sup> August – 29 <sup>th</sup> August and from 20 <sup>th</sup> September – 24 <sup>th</sup> September 2016  17 <sup>th</sup> May 2018, 20 <sup>th</sup> June 2018, 11 <sup>th</sup> July 2018, 15 <sup>th</sup> August 2018 and 12 <sup>th</sup> September 2018  Anabats (total of 7 anabats across the site) were deployed for 5 nights per month May – September 2018.	The surveys followed BCT guidelines (2016).

<sup>1</sup> <https://www.bto.org/our-science/projects/birdatlas/methods/breeding-evidence>

Reptiles	<p>The refugia were placed around the edges of the site adjacent to areas of scrub, hedgerow and within the more developed grassland field margins.</p> <p>Mats were set up prior to the commencement of the reptile survey. A total of seven survey visits were made to the site to check the refugia for the presence of reptiles during each survey. Visits were only carried out if the weather conditions were suitable for locating reptiles. On each visit to the site, a minimum of one circuit to check all refugia was carried out.</p> <p>Natural refugia were also surveyed during these visits. Any natural refugia, such as log piles and brash piles, were lifted and hand searched for evidence of reptiles.</p>	<p>12<sup>th</sup> September 2016 – 28<sup>th</sup> September 2016</p> <p>3<sup>rd</sup> April 2019 – 21<sup>st</sup> May 2019</p>	<p>The timing and number of surveys completed were based on guidelines produced by Froglife (1999) and Gent and Gibson (1998).</p>
Badgers	<p>During the survey, all habitats potentially suitable for badgers were systematically examined for evidence of badger activity. Particular attention was paid to areas where the vegetation and/or the topography offered suitable sett sites such as embankments and wooded areas.</p>	<p>April 2016</p> <p>15<sup>th</sup> February 2018</p> <p>Monitoring April- May 2018</p>	<p>The evaluation of badger activity was based on methodology developed for the National Survey of Badgers (Creswell <i>et al.</i>, 1990).</p>
Great Crested Newt Surveys	<p>Habitat Suitability Index Surveys conducted April 2016</p> <p>Thirteen ponds were identified within 250m of the site to the south and west. The ponds off-site were surveyed for their potential to support GCN using the Habitat Suitability Index criteria. The suitability index is calculated for each of the 10 categories. These are then analysed using the equation below to obtain the geometric mean or HSI score of the ten suitability indices.</p> $HSI = (SI_1 \times SI_2 \times SI_3 \times SI_4 \times SI_5 \times SI_6 \times SI_7 \times SI_8 \times SI_9 \times SI_{10})^{1/10}$ <p>The calculated score should be between 0 and 1 and will fall within one of several bands, which correspond to a given category for the pond.</p>	<p>April 2016</p> <p>April 2018</p>	<p>Oldham <i>et al</i> (2000)</p>



	<p>eDNA surveys conducted</p> <p>All water samples were taken by Emma Bagguley BSc (hons) Msc who holds a WML-CL08 GCN Survey Level 1 license – REF: 2016-23003-CLS-CLS.</p> <p>All water samples were analysed by SureScreen Scientifics in accordance with the protocol set out in Appendix 5 of Biggs <i>et al.</i> (2014).</p> <p>Population assessments following Natural England guidelines, involve bottle trapping, torching, netting and egg searching. Great Crested Newt Mitigation Guidelines (English Nature 2001).</p>	<p>June 2016</p> <p>April – May 2018</p>	Biggs et al (2014)
Dormice	<p>A total of 50 dormouse tubes were established along the woodland edge, hedgerow and tree line habitats on-site, June 2016</p> <p>Checks were undertaken once a month in June, July, August, September, October and November 2016. The survey must continue until the search effort score of 20 has been reached. Suitable habitats for dormice were present within the woodland edge, hedgerow and tree line habitats on-site. Tubes were established in June and surveys ran into November, which have now been completed, ensuring that a survey effort of 20 had been reached.</p>	<p>June – November 2016</p> <p>19<sup>th</sup> September 2018 – 23<sup>rd</sup> October 2019</p>	Dormouse Conservation Handbook – English Nature
Farmland Bird Surveys	<p>The bird survey was conducted at the end of winter and during the spring of 2017. The survey was conducted once a month in February, March and May to catch a range of bird species that may be utilising the farmland habitats</p>	<p>23<sup>rd</sup> February 2017</p> <p>29<sup>th</sup> March 2017</p> <p>12<sup>th</sup> May 2017</p>	<p>The survey was conducted using standard Common Birds Census (CBC) methodology as developed by the British Trust for Ornithology (BTO) (Gilbert <i>et al.</i> 1998).</p>

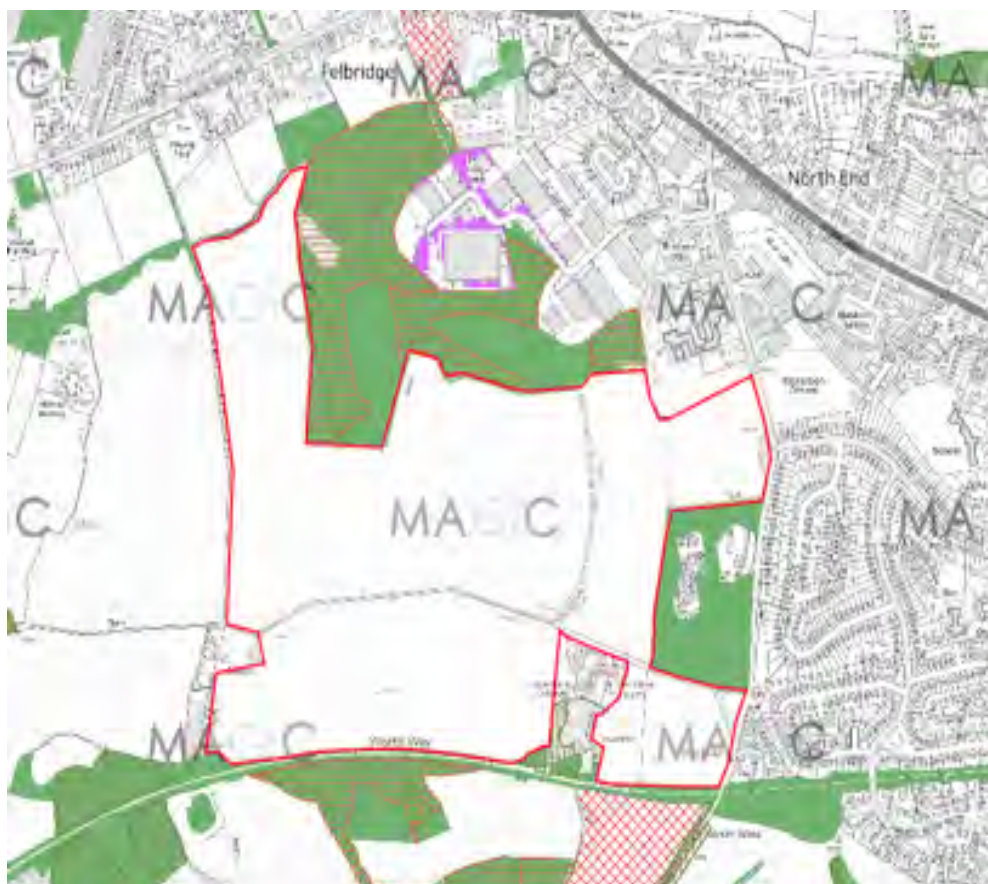
### Limitations

- 2.5 It should be noted that while every effort has been made to provide a comprehensive description of the site, no single investigation could ensure the complete characterisation and prediction of the natural environment.

### 3.0 Desktop Study

- 3.1. The site itself is not designated for its ecological importance or for its nature conservation value.
- 3.2. There is one designated site that lies within 2km of the site, Hedgecourt SSSI is located approximately 1.9km to the north west of the site. The site was designated as a SSSI due to the occurrence of notable aquatic vegetation, invertebrates and breeding birds.
- 3.3. Ashdown Forest SPA, SAC and SSSI is located just over 5km from the red line boundary. Two SNCIs are found within the local area, Worth Way approximately 30m south and Lobbs Wood and Furnace Ponds 2km west of the site.
- 3.4. In addition, there are a number of notable habitats on site or in close proximity which include (Figure 2):
  - Unnamed deciduous woodland is located immediately north of the site.
  - Birches Shaw ancient replanted woodland is located approximately 10m north of the site.
  - A separate compartment of Birches Shaw ancient replanted woodland is located immediately to the north of the site.
  - Unnamed good quality semi-improved grassland is located approximately 0.2km to the north.
  - Unnamed deciduous and broadleaved woodland is located immediately to the east of the site.
  - Unnamed deciduous woodland is located immediately to the south of the site.
  - Coles ancient replanted woodland is located approximately 0.2km to the south of the site.
  - Great ancient replanted woodland is located approximately 0.2km to the south of the site.
  - Railway Shaw ancient and replanted woodland is located approximately 20m to the south of the site.
  - Gulledge ancient and semi-natural woodland is located approximately 80m to the east of the site.

- Greenfield Shaw ancient replanted woodland is located approximately 0.5km to the east of the site.



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**Figure 2: Priority deciduous woodland (green), ancient woodland (brown hatch) and no main habitat but additional habitats (red cross hatching) habitats in the locality of the site.**

3.4 A 2km radius data search was requested from Sussex Biodiversity Records Centre (SxBRC) records centre. Notable species from this search are outlined below (Table 2). Only records from within the last 10 years, closest to site and relevant to the habitats on site have been included. It should be noted these records are from 2016, additional records may have been added in the intervening years.



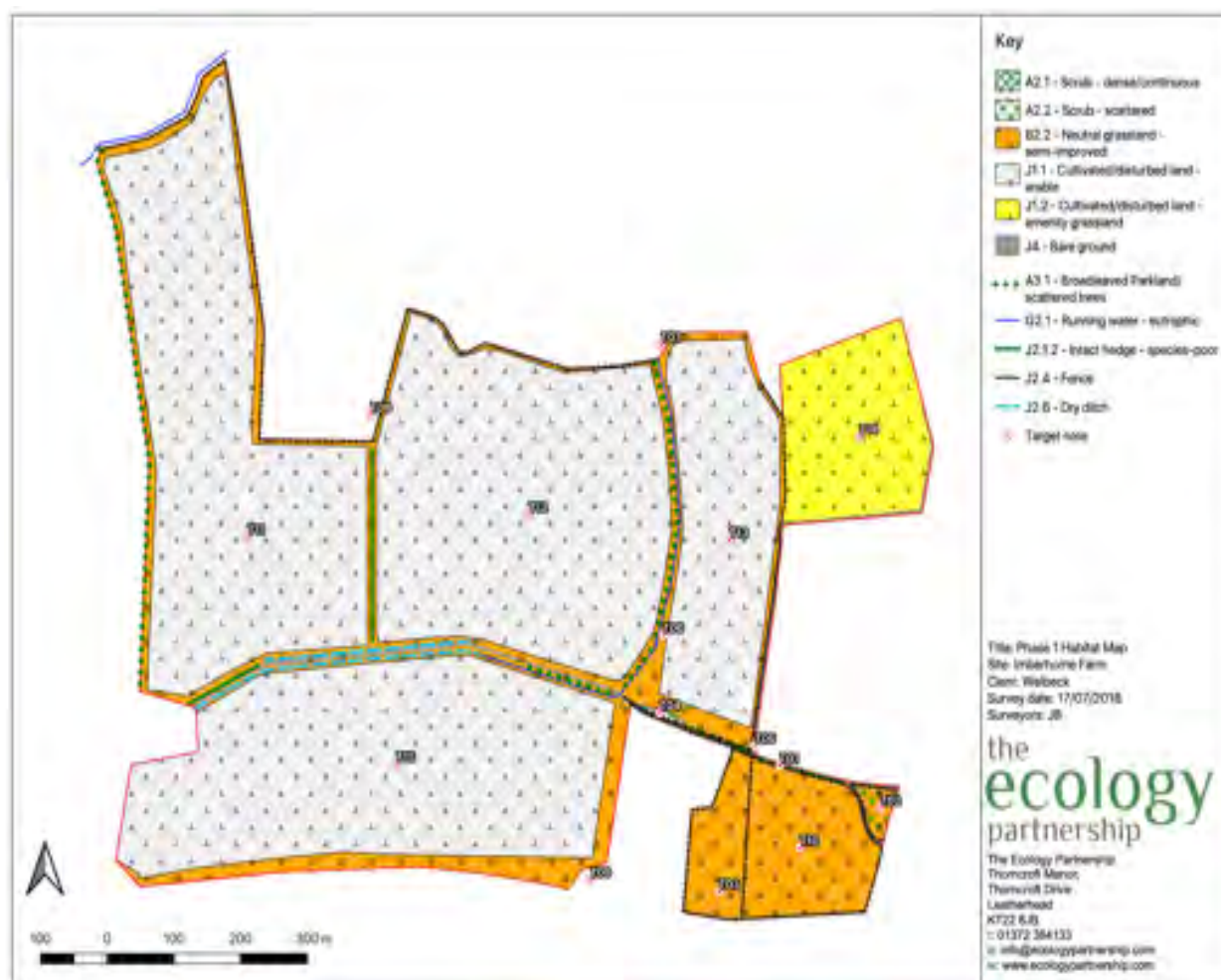
**Table 2: Notable species recorded within 2km of the site over the last 10 years**

Species	Status	Record distance	Record year
Great Crested Newt <i>Triturus cristatus</i>	Wildlife and Countryside Act (1981 as amended) Schedule 5; Bern Convention Appendix 2; European Protected Species; Habitats Directive Annex 2 & 4; NERC Act (2006) Section 41	Approximately 1.5km N	2012
Daubenton's Bat <i>Myotis daubentonii</i>	Conservation of Habitats and Species Regulations (2010) Schedule 2; Habitat and Species Directive (1992) Annex 4; Wildlife and Countryside Act (1981 as amended) Schedule 5	Approximately 1.8km N	2008
Common Pipistrelle <i>Pipistrellus pipistrellus</i>	Conservation of Habitats and Species Regulations (2010) Schedule 2; Habitat and Species Directive (1992) Annex 4; Wildlife and Countryside Act (1981 as amended) Schedule 5	Approximately 1.7km N	2014
Soprano Pipistrelle <i>Pipistrellus pygmaeus</i>	Conservation of Habitats and Species Regulations (2010) Schedule 2; Habitat and Species Directive (1992) Annex 4; Wildlife and Countryside Act (1981 as amended) Schedule 5	Approximately 1.8km N	2008
Brown Long-eared Bat <i>Plecotus auritus</i>	Conservation of Habitats and Species Regulations (2010) Schedule 2; Habitat and Species Directive (1992) Annex 4; Wildlife and Countryside Act (1981 as amended) Schedule 5	Approximately 1.7km N	2014
Peregrine <i>Falco peregrinus</i>	Wildlife and Countryside Act (1981 as amended); Birds Directive Annex 1; Bern Convention Appendix 2	Within 2km	2012
Hobby <i>Falco subbuteo</i>	Wildlife and Countryside Act (1981 as amended) Schedule 1; Bern Convention Appendix 2	Within 2km	2011
Black Redstart <i>Phoenicurus ochruros</i>	Wildlife and Countryside Act (1981 as amended) Schedule 1; Bern Convention Appendix 2; Red List BoCC	Within 2km	2011
Cuckoo <i>Cuculus canorus</i>	NERC Act (2006); BoCC Red List	Approximately 1.2km SW	2010
Common Crossbill <i>Loxia curvirostra</i>	Wildlife and Countryside Act (1981 as amended) Schedule 1; Bern Convention Appendix 2	Approximately 1.2km SW	2012
Red Kite <i>Milvus milvus</i>	Birds Directive Annex 1; Wildlife and Countryside Act (1981 as amended) Schedule 1; Convention on Migratory Species Appendix 2	Approximately 1.2km SW	2012
Redwing <i>Turdus iliacus</i>	Wildlife and Countryside Act (1981 as amended) Schedule 1; Birds Directive Annex 2.2; Red List BoCC	Approximately 1.9km N	2012
Fieldfare <i>Turdus pilaris</i>	Wildlife and Countryside Act (1981 as amended) Schedule 1; Birds Directive Annex 2.2; Red List BoCC	Approximately 1.2km SW	2011

#### 4.0 Phase 1 Habitat Survey

4.1 The site is comprised largely of arable land fields with semi-improved grassland field margins, a field of grazed semi-improved grassland is situated in the southeast corner of the site. The fields are bounded by a combination of hedgerows, fence lines, treelines and broadleaved woodland compartments, a ditch containing running water also runs from south to north in the central northern area of the site. A hardstanding road, also a public right of way, runs from east to west across the centre of the site. The site is private but features a number of public rights of way across the site and around the field boundaries. An area of amenity grassland added to the site in 2018 was not accessible to survey at the time.

4.2 The habitat map is shown below in figure 3.



*Figure 3: Habitat Map updated 2018*

#### 4.3 The habitats are summarized below:

- Arable: There were four arable fields which dominated much of the site. The three northern arable fields (Target notes T11, T12 & T13) contained wheat and the southern field (Target note T15) contained a sown grassland mix.
- Semi improved grassland: Several areas of semi improved grassland were located within the redline. There is an area of south eastern corner of the site, with further areas located around the field margins.
- Scrub: Small sections of scrub included the dominant species, such as bramble, broom, hazel, blackthorn, silver birch with spear thistle, curled dock and ribwort plantain.
- Mature tree line: The northern boundary of the south east section of the site consisted of a mature tree line with species including English oak, holly, silver birch, honeysuckle, horse chestnut, hawthorn, cherry laurel and English elm.
- Intact hedgerows located on the boundaries of the site. Some of these supported native species whilst one supported rhododendron. Intact species rich hedgerow with trees are also located on the site, recorded on the western boundary of the western boundary of the most westerly arable field was an intact species rich hedgerow with trees.
- Tree lines were located on the edges of the site including the northern boundary of the most westerly arable field, with a tree line running north to south between the eastern and centre arable fields. The western boundary of the site featured a tree line with a well-developed scrub understory, it bordered a stream to the north.
- Bare earth/ Hardstanding: A concrete access road ran from east to west across the centre of the site, connecting the site to the adjacent Imberhorne Lane. A gravel footpath also ran along the eastern site boundary to the north of the road.
- Dry ditches were situated either side of the road running along the centre of the site.
- Fence lines were located around the grazed semi-improved grassland and along the northern arable fields bordering the adjacent woodland to the north.
- Running water: A stream was identified running from south to north across the centre of the site, culverted under the hardstanding road. The stream continued off-site into the adjacent broadleaved woodland compartment to the north.

4.4 Four hedgerows were present on-site along the field margins and site boundary and are illustrated in Figure 4. None of the hedgerows were considered to be 'important'. The hedgerow characteristics and woody species are summarised in table 3.





*Figure 4: Hedgerows present on site*

*Table 3: Summary of hedgerow characteristics and assessment*

Hedgerow	Woody species <sup>1</sup>	Structure/ Type	Features/ Notes	Important?
H1	Hawthorn, Ash, Yew, Hazel, Elm	Short, intact, trimmed, juvenile trees	Runs parallel to a ditch, gaps do not exceed 10% of length of hedgerow, Approx. 80m	N
H2	None	Short, intact	Gaps do not exceed 10% of length of hedgerow Approx. 30m	N
H3	Hawthorn, Hazel, Dogwood	Trimmed regularly	Gaps do not exceed 10% of length of hedgerow Approx. 270m	N
H4	Blackthorn, Cherry, English oak,	Un-managed	Approx. 130m.	N

<sup>1</sup> Woody species listed under Schedule 3 of the Hedgerow Regulations 1997

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## 5.0 Protected Species – Bats

- 5.1 There were a number of individual trees which had 'low' to 'moderate' roosting potential for bats. The trees target noted within the PEA report contain potential roosting features such as woodpecker holes, rot holes, trunk and branch splits, loose bark and cavities, which can all be utilised by bats for roosting purposes. It is considered that the majority of these are to be retained within the scheme.
- 5.2 Surveys undertaken on land adjacent to the site to the east, Imberhorne Lane, in May, June and September 2009 by Nicholas Pearson Associates, identified the most common species using the site were common and soprano pipistrelles. Myotis species and brown long eared bats were recorded only occasionally across the site.
- 5.3 Bat activity transect surveys were carried out on the 17<sup>th</sup> August and 8<sup>th</sup> September 2016 and further surveys on the 17<sup>th</sup> May, 20<sup>th</sup> June, 11<sup>th</sup> July, 15<sup>th</sup> August and 12<sup>th</sup> September 2018. The surveys followed Bat Conservation Trust guidelines (Collins, 2016). Three transect routes were mapped using Google Earth imagery that took in all the areas of suitable habitat identified during the initial PEA.
- 5.4 The walked transects indicated a low to moderate level of activity across the site comprised of largely common species. Common pipistrelle was abundant with occasional soprano pipistrelle, infrequent noctule and Myotis sp. and very low numbers of brown long-eared and serotines.
- 5.5 The activity comprised a largely equal mix of both foraging and commuting passes. There was a noticeable bias for commuting activity to the centre and east of the site, whereas foraging activity was more evenly spread across the site. This is perhaps due to the site bordering more developed habitat to the east whereas the west connects to a network of mature woodland and hedgerows, providing better foraging opportunities. Activity was greatest along the northern woodland edge, northwest corner of the site and along the sections of road and footpath where overhead trees had formed a closed canopy.
- 5.6 The static detectors largely reflected the findings of the walked transects, with common pipistrelle by far the most frequently recorded species and occasional soprano pipistrelle

passes, low numbers of noctule and myotis and very low numbers of brown long-eared bat and serotine. The static detectors also indicated the presence of Leisler's bat and Nathusius' pipistrelle species, albeit at very low levels of activity.

5.7 As a whole, the site is considered to be of local importance for bats, while high levels of activity were recorded in specific areas of the site, the activity was dominated by common species, with only small numbers of scarcer species such as Myotis and noctules. In addition, much of the site was considered of low quality for bats, comprised of habitats of limited value to bats such as large arable fields and grassland.

5.8 Recommendations for enhancements for bat include; creation of new tree lines and hedgerows, species rich planting, wildlife planting around SUDs and drainage pond features, use of wildflowers in grassland, low light levels and buffering of significant habitats. The SANGS space, will create a significant uplift in terms of suitable habitat for foraging bats. Bat boxes will also be introduced within the scheme.

## **6.0 Protected Species – Reptiles**

6.1 The site was surveyed for reptiles in September 2016 by Ecology Partnership. The survey identified the presence of “low” populations of both slow worm and common lizard. The reptiles were largely restricted to the eastern site boundary and southeast field.

6.2 An update survey was undertaken between April and May 2019. Over eight visits, a peak count of 1 adult grass snake, 1 adult slow worm and 3 adult common lizards were identified.

6.3 Three species of reptile was identified on-site, grass snake, slow worm and common lizard. The reptiles were primarily situated in two locations on-site, the triangle of land on the eastern site boundary and adjacent to the school in the northeast corner.

6.4 When compared to surveys undertaken in 2016, the peak numbers of common lizard increased slightly from 1 to 3, with slow worm numbers staying the same. In addition, grass snakes were not identified previously. The reptiles do not appear to have spread across the site, with the majority identified in the same location as the previous survey. Notably, no reptiles were found in the southeast field in 2019, this area was heavily sheep



grazed and therefore considered unsuitable for reptiles. The majority of the site was considered to be unsuitable for reptiles, with the arable landscape being of negligible importance to this species.

- 6.5 A receptor area should be established within an area of the site proposed as green space. The receptor should be suitable for holding reptiles from the commencement of the trapping period. The design of the development, notably with areas of open green space, SANGS, will provide sufficient opportunities to support reptiles within the site. A range of enhancements, including grassland habitats, scrub and log pile mosaic, will be introduced as part of the scheme. It is considered that the site has plenty of space to support reptiles on site and in perpetuity.

## **7.0 Protected Species – Dormice**

- 7.1 Initial surveys were undertaken in June, July, August, September and November 2016 did not find any evidence of dormice using any of the nest tubes within the site.
- 7.2 Dormouse nest tubes were re-established across the site's hedgerows and treelines on 19<sup>th</sup> September 2018 to provide an update survey. A total of 130 dormouse tubes were established along the boundary treelines and hedgerows on site. Checks were undertaken monthly in October 2018 to October 2019.
- 7.3 No evidence of dormice was identified during these surveys, such as nests, feeding remains or live individuals, in any of the nest tubes on site. The only species found to be using the tubes were wood/yellow-neck mice
- 7.4 Dormice are not considered to be present and the site is not considered to be constrained by dormice.

## **8.0 Protected Species – GCNs**

- 8.1 In 2016 a total of 13 ponds were identified within 250m of the site boundaries. Ponds 4 – 9 could not be accessed for eDNA surveys. Ponds 1, 2 and 3 supported dense stocking of fish and were not considered suitable for GCNs, ponds 10, 11, 12, 12a and 13 were sampled

for DNA. Ponds 11, 12, 12a and 13 were identified as being negative for DNA. Pond 10 was positive and support GCN DNA and therefore GCN presence was confirmed.

8.2 Update GCN surveys were conducted in 2018. A ditch containing slow flowing water was identified in the centre of the site, a further 16 ponds were identified within a 250m radius with a further five ponds within 500m. Given the poor quality of the on-site habitat only ponds within 250m were surveyed further for GCN.

8.3 Ponds P1, P2 and P3 were commercial fishing lakes and so were not considered further. Therefore, the on-site ditch and, where access permitted, fourteen off-site ponds were surveyed using a combination of the following methods. These ponds were numbered for ease of reference (Figure 5).



*Figure 5: Waterbodies within 250m and 500m of site boundary, labelled for ease of reference. Dashed dark orange polyline indicates 250m site buffer and dashed yellow polyline indicates 500m site buffer.*

- 8.4 Permission was granted for eDNA surveys to be undertaken on ponds P12, 12a and P13 situated within private land off-site in 2018. These ponds, ponds 12, 12a, and 13 were found to be positive for eDNA and as such these ponds were considered to support GCNs.
- 8.5 Additional pond surveys were undertaken on ponds P8, P9, P10, P11 and P11a and ditch D1 order to determine presence/likely absence and approximate population sizes.
- 8.6 Of the waterbodies surveyed further, three were found to contain adult GCNs, ponds P9, P11 and P11a all supported a small population. In addition, GCN eggs were identified on vegetation within ponds P8, P11 and P13, indicating they are in use as breeding ponds. GCN were considered likely to be absent from ditch D1 and P10 at the time of the survey. The peak count recorded on a single survey night was 7 adult GCN. The results are shown in figure 6.



*Figure 6: Location of surveyed ponds in relation to the redline boundary.*



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- 8.7 The western and southern areas of the site closest to the GCN ponds are to be kept free of development and managed as a country park/suitable alternative natural greenspace (SANG). As such it is considered that the terrestrial habitat around the ponds which support GCNs, will be significantly improved as a result. Whilst there will be a change in land use, the changes will be of benefit to GCNs and other amphibians.
- 8.8 The proposals do not result in the isolation of GCN populations or direct impacts upon GCN ponds. While the actual development will take place away from GCN ponds and within terrestrial habitat of poor suitability, given the large scale of the development consideration must be given towards GCN.
- 8.9 A range of measures to enhance the site for GCNs has been recommended. This includes but not limited to; use of wildlife friendly SUDs systems, creation of wildlife ponds, enhancement of terrestrial habitat, enhanced hedgerows and refugia. A licence maybe required depending on the final layout. Sensitive clearance works will be recommended. The country park / SANGS will be considered a significant enhancement in terms of terrestrial habitat availability.
- 9.0 Protected Species – Badgers**
- 9.1 The site was surveyed for badgers in January 2018, five badger setts were identified on-site or within 20m of the site boundary where access was possible.
- 9.2 Setts 3, 4 and 5 were all situated within or on the edge of woodland on the site boundary and a sufficient distance from any proposed development, the proposals are therefore not considered to be constrained by the presence of these setts and no further monitoring was considered necessary. These were also largely individual holes and therefore unlikely to be a main or breeding sett.
- 9.3 Setts 1 and 2 were both within proximity to proposed development, further monitoring of these setts was therefore undertaken in order to determine if the holes were active badger setts and in what capacity they were in use.



*Figure 7. Location of badger setts identified during January 2018 survey.*

- 9.4 Both sett 1 and sett 2 were considered active badger setts. Given the presence of badger cubs and well-developed nature of the holes, it is considered that sett 1 is a main breeding sett. Sett 2 appeared to be used only on an occasional basis and comprised of a single hole, typical of an outlier sett.
- 9.5 Sett 1 is to be retained within the scheme and suitably buffered. Sett 2 may be impacted by the development, and as such would require closure. However, it is considered that the development support sufficient open space and green corridors to ensure badgers are able to move across the landscape. Enhancements for badgers will be included within the design and include, planting native fruiting species and hedgerow species, maintaining and enhancing green routes and corridors. Impacts are not considered to be significant.

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## 10.0 Protected Species – Breeding Birds

- 10.1 The bird survey was conducted once a month in February, March and May 2017 to catch a range of bird species that may be utilising the farmland habitats. A total of 21 species were recorded over three survey visits. Of these, some were only recorded once, including fieldfare and redwing, and therefore are more likely to be using the site as they pass through.
- 10.2 Farmland bird species considered to be in decline that were found to be actively using the site included 2- 3 breeding pairs of yellowhammer and 3 – 4 pairs of skylark.
- 10.3 Goldfinch, woodpigeon, whitethroat and jackdaw are all listed on the Farmland Indicator List, however these birds show a general increase in population trend. These species were also found on site in moderate-high numbers.
- 10.4 It is considered that several of the common species on site are likely to nest within the hedgerows throughout the site and in the woodland that borders the site to the north and south. These species include but are unlikely to be limited to blackbird, blue tit, chaffinch, chiffchaff, dunnock, goldfinch, great tit, green woodpecker, house sparrow, magpie, robin, woodpigeon and wren.
- 10.5 Recommendations include the maintenance and enhancement of hedgerows and associated edges, including enhancing the woodland edges, creation of native planting within SUDS systems, provision of graduated habitat edges, dense scrub pockets and native tree planting.
- 10.6 Skylark, which require more specialised ground nesting provisions, can be created within the SANGS are or on off site arable land. However, winter starvation is often associated with skylark reduction, due to changes in arable management, The creation of flower and species rich habitat edges, wildflower areas, and provision of more diverse habitats, within the SANGS area, will provide opportunities for increased foraging over winter. As such, compensation for ground nesting habitat and provision of enhanced planting / landscape provision is likely to provide some interest, albeit may still result in a loss of some suitable ground nesting provisions.



## 11.0 Ecological Impacts

11.1 An EcIA was produced as part of the application for the site in 2018. The summary of the impact assessment has since been reviewed due to slight changes in the baseline, including the identification of badger setts on site.

11.2 Residual impacts are considered below taking the up to date development proposals, construction and operational impacts, alongside mitigation measures. The outcome of the layout of the site and the mitigation measures employed throughout the construction and operational stages of the development aim to removal, where possible, any residual impacts.

**Table 4 Residual Effects Resulting from the Proposals**

Receptor Receptor Importance	Significance before mitigation	Mitigation	Residual Impacts
Ashdown Forest SPA, SAC, SSSI  (International)	Major negative	On site SANGS On site recreation including play areas On site links to wider landscape footpaths and cycle paths Green links and corridors around the site	Negligible
Hedgecourt SSSI  (National)	Major negative	On site SANGS On site recreation including play areas On site links to wider landscape footpaths and cycle paths Green links and corridors around the site	Negligible
Worth Way (adjacent to the site) SNCI  (Local)	Minor negative	On site SANGS On site recreation including play areas On site links to wider landscape footpaths and cycle paths Green links and corridors around the site	Negligible
Local wildlife sites including;	Minor negative	On site SANGS On site recreation including play areas	Negligible

Lobbs Wood and Furnace Wood  (local)		On site links to wider landscape footpaths and cycle paths Green links and corridors around the site	
Ancient woodland and lowland deciduous woodland (adjacent to the site to the north and south of the site)  (local)	Minor negative	15m buffer zones implemented around the site Further use of SUDS and attenuation ponds to provide a larger buffer in addition to the 15m No gardens to back on to woodland habitats No lighting adjacent to woodland edges Long term management of semi natural habitats associated within the buffer to enhanced the habitat and species diversity	Minor positive
Mature and semi mature trees (site)	Negligible	Long term management plan and including tree management	Minor positive
Habitats lost: including semi improved grassland, ruderal habitats and pockets of scrub (site)	Minor negative	N/A	Negligible
Newly created habitats including outside new POS and Country Park areas: Semi-improved grassland, wildflower grassland and scrub/shrub planting (site)	Negligible	Long term management plan	Minor positive
Country Park / SANGS	Negligible	Long term management plan Multiple habitats created, including	Minor positive

		woodland, scrub land, new ponds and wildflower habitat	
Green corridors and green links	Negligible	Retention of trees and off site woodland, improved management, new planting	Minor positive
Attenuation ponds	Negligible	Long term management plan Native species planting and edge habitat creation	Minor positive
Bats foraging (Local)	Minor negative	Retention of trees and off site woodland, improved management, new planting included enhanced buffer zones Country park / SANGS area provision of new diverse habitat on site Implementation of sensitive lighting scheme providing dark corridors Erection of bat boxes	Minor positive
Bats roosting (local)	Negligible	Retention of trees and off site woodland, improved management, new planting Erection of bat boxes	Minor positive
Badgers (Local)	Minor negative	On site setts retained and buffered, potential for disturbance.  Improved habitat creation and new planting including species which badgers can forage from.  Green edges and links allow badgers to move across the wider landscape.	Negligible
Reptiles (Local)	Minor negative	Translocation of reptiles following best practice.	Negligible



		New planting enhancements and sensitive habitat management post development	
Dormice	N/A	N/A	N/A
GCNs	Minor negative	Buffer zones created and enhanced, new terrestrial habitat enhanced, refugia, new planting etc long term management	Minor positive
Birds	Minor negative for skylark  Negligible for common birds within the site	Skylark habitat created within the GCN / reptile zone within country park / SANGS area Maybe subject to disturbance from recreation  New diverse habitat creation in buffer zones, woodland, green corridors  Bird boxes within the scheme.	Minor negative  Negligible

## 12.0 Enhancements

12.1 Site enhancements have been recommended to improve the quality of the site for protected species, provide net gains to biodiversity post-development and to ensure that the proposals comply with local planning policy. It is important to use native species of local provenance in landscaping schemes to enhance the ecological value of a development.

12.2 Enhancements for the site are aimed at a number of species found on site as well as more general enhancements. These will include but not be limited to the following:

- Creation of new high distinctiveness habitats including orchard, lowland meadows, native hedgerows, reedbeds, and ponds, to be managed in the long term for biodiversity;

- Enhance connectivity between woodland blocks, including off site woodland habitats;
- Installation of specialist bird and bat boxes on retained mature trees along the site boundary as well as through the use of integral boxes;
- Creation of log piles and reptile hibernacula to provide safe refuge and hibernation sites for reptiles, amphibians, and, hedgehog; and,
- Incorporation of small holes at the base of any proposed garden fencing to facilitate access to gardens for hedgehogs;
- Appropriate management of retained greenspace for the benefit of wildlife.

12.3 The design of the development supports 'Green Infrastructure' aspirations. Green infrastructure provides a network of interconnected habitats to enable dispersal of species across the wider environment and to provide ecosystem services, including but not limited to, enhancements for pollinators, water filtration and flood prevention. The creation of a number of networks within the site and through the site, using a range of differing habitats, provides an enhanced landscape. The country park / SANGS will provide a significant area of on site habitat creation.

### **13.0 Conclusions**

13.1 The land at Imberhorne Farm is dominated by both arable and semi-improved grassland fields. There are numerous treelines and hedgerows surrounding the fields, and ancient woodland along the northern and southern boundaries. The buildings belonging to the Imberhorne Farm are not included in the development area. Numerous waterbodies are present to the southwest of the site.

13.2 The site has been subjected to numerous surveys including bats, badgers, reptiles, birds, dormice and GCNs.

13.3 The site supports a 'low' populations of common lizards, slow worms and grass snake. The site does not support any GCNs ponds, however, a number of ponds are located to the south west of the site has been identified as supporting GCNs, albeit in low numbers. No ponds are to be lost to the development. Terrestrial habitat improvements are recommended, alongside new wildlife ponds.

- 13.4 The site supports numerous common bird species, with some species of conservation concern, such as the yellowhammer and skylark. Recommendations for enhancing breeding bird opportunities, have been recommended.
- 13.5 The site supports a range of bat species using the site, dominated by common pipistrelles. Recommendations for a range of habitat enhancements have been made, including provision of new tree lines and layered habitat edges.
- 13.6 No dormice have been identified on site. No specific considerations for this species are therefore made.
- 13.7 Several badger setts are present on site, including a main breeding sett. It is considered that these are likely to be able to be retained on site. However, update surveys would be required. The landscape will include green links and corridors and native species planting to provide opportunities for foraging badgers.
- 13.8 The design of the development provides new opportunities for a range of species found to be on site, with opportunities to enhance habitats for CGNs and reptile species. The site maintains habitat connectivity and linkages, ensuring bat foraging habitat and commuting corridors are maintained within the scheme. New opportunities for roosting will be provided.
- 13.9 The skylark will lose habitat as a result of the development. Whilst the country park / SANGS provision can provide some habitat, and through careful management can control access to an area of the site, disturbance could occur through recreational pressure. The skylark is most likely to be impacted by the development. As such a minor negative impact is predicted on this species, even if the mitigation proposed is implemented. However, the more common birds found within the site are likely to have experience negligible impacts.
- 13.10 Habitats within the site were considered to be common and widespread. Off site habitats included ancient woodland and lowland deciduous woodland, which were considered to be of ecological value. Worth Way, an SNCI, is located adjacent to the southern boundary.



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- 13.11 Impacts from development on offsite and adjacent habitats, including ancient woodland and lowland deciduous woodland, SNCIs and other local designated sites are not considered to be significant. The development includes an extensive country park / SANGS which will provide new ecological opportunities within the landscape, connecting to buffer zones and off site habitats in and around the site and as such preserving ecological networks. With the design of the development maintaining such linkages and provide new habitats within the site, it is considered no impacts on these habitats are predicted.
- 13.12 The site is located within 7km of the Ashdown Forest SPA, SAC and SSSI. It is considered that without mitigation, increased recreational pressure could have a negative impact on the designated site. The masterplan for the site shows that appropriate mitigation in the form of SANG is present and therefore no significant negative impacts will be caused. It is considered that this provision and the links to local footpaths provide sufficient public recreational space to limit the impact on the SPA.

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