

**Imberhorne Lower School, Windmill Lane, East
Grinstead, RH19 2DT**

Erection of a single-storey modular building

Planning Statement

**Prepared on behalf of West Sussex County Council
July 2026**



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1.0 Introduction

- 1.1 This planning statement has been produced by Parker Dann on behalf of West Sussex County Council (WSCC) in support of the full application (Regulation 3) for development at the Imberhorne Lower School site, Windmill Lane, East Grinstead, West Sussex.
- 1.2 The proposed development within the application is for the erection of a new modular building with three classrooms, office spaces, meeting rooms, a kitchenette and associated services and facilities, to provide enhanced facilities for pupils with Special Educational Needs and Disabilities (SEND), alongside additional accommodation for school leadership and administrative functions. The proposal will also include the incorporation of Sustainable Drainage Systems (SuDS) to upgrade the existing drainage system.
- 1.3 This statement should be read alongside the following documents:
- The completed application forms;
 - L_01 Location Plan
 - BP_01 Existing and Proposed Block Plans
 - ESP-01 Existing Site Plan
 - PSP_01 Proposed Site Plan
 - PL_02 Proposed Elevations
 - PL_01 Proposed Plan
 - Supporting Statement from the County Council's Strategic Development Manager;
 - Arboricultural Implications Assessment; and
 - Foul Sewage and Surface Water Drainage Assessment.

2.0 Application Site Context, History and Proposal

- 2.1 Imberhorne School has two sites at Imberhorne Lane and Windmill Lane. This application relates to the site on the western side of Windmill Lane, known as Imberhorne Lower School.



Figure 1 Aerial View of the School with an arrow signalling the location of the proposed development.

- 2.2 The application site is located amongst the existing school buildings, towards the northern end of the existing built envelope of the site and consists of an area of existing hardstanding and the existing music classroom building. Photos of the site are shown in **Figures 2 – 4**.
- 2.3 The wider School site lies within the Built-up Area Boundary of East Grinstead and is largely unconstrained as it does not fall within a Conservation Area, Flood Zone, National Landscape or Protected Habitats, and there are no Listed Buildings, Scheduled Monuments or Tree Protection Orders (TPOs) on the site.
- 2.4 The site falls within the 7km buffer zone of the Ashdown Forest, and there is no risk of flooding from any source where the proposal is to take place.



Figure 2 Looking North within the application site. The music classroom building is to the right of the picture.



Figure 3 Looking east within the application site towards Windmill Lane. The music classroom building is to the right of the picture.



Figure 4 Looking south east within the application site. The music classroom building is to the left of the picture.

Site History

- 2.5 Although Imberhorne School was founded in 1708 as a Free Grammar School, the Imberhorne Lower School campus at Windmill Lane was not opened until 1928 as a new East Grinstead County School, with spaces for 23 girls and 39 boys. The School underwent several expansions. By 1938, the school had grown to two forms in each of the first five years, with a small sixth year. 1946 saw the addition of a Junior Technical School, which was later enlarged in 1953 to provide a new technical block.
- 2.6 The school adopted the title of East Grinstead County Grammar School in 1958, and by 1963, the school had 535 pupils. Following the introduction of comprehensive education to East Grinstead in 1970 and the amalgamation of East Grinstead County Grammar School and Imberhorne County Secondary School, the Windmill Lane site housed around 500 pupils of the first and second years (ages 11 – 12).
- 2.7 Imberhorne Lower School at Windmill Lane in East Grinstead is a 9FE (270 places per year) 11-18 secondary school with 6th form provision.

Imberhorne School also has Special Educational Needs and Disabilities (SEND) provision for students identified as requiring extra support through their time at the School.

- 2.8 The sites' planning history available through the Mid-Sussex District Council's planning register has been summarised in the Table below.

Reference	Application Type	Proposal	Decision Date	Decision
WSCC/018/26	Regulation 3	<i>Demolition of the existing modular building and erection of a single-story modular building with associated works.</i>	06/07/2026	Permit with Conditions
WSCC/013/26/PNO	Regulation 3 – Prior Notification	<i>Prior Notification for the demolition of a single storey classroom building.</i>	12/05/2026	Application Determined
DM/20/0400 (WSCC/007/20)	Regulation 3	<i>Amendment of Condition 1 of planning permission WSCC/010/10/GR to allow the continued siting and use of a temporary classroom.</i>	26/03/2020	Permit with Conditions
DM/15/0079 (WSCC/002/15/GR)	Regulation 3	<i>Amendment of condition 1 of planning permission WSCC/010/10/GR to allow the continued siting and use of a temporary classroom unit.</i>	09/02/2015	Permit with Conditions
14/03010/C3REG (WSCC/059/12/GR)	Regulation 3	<i>Installation of modular porta-cabin to provide additional teaching space for 5 years.</i>	09/10/2014	Permit with Conditions
14/02567/C3REG (WSCC/044/14/GR)	Regulation 3	<i>Erection of a barrel roof canopy.</i>	15/08/2014	Permit with Conditions
10/00089/C3REG (WSCC/010/10/GR)	Regulation 3	<i>The continued siting and use of a temporary classroom unit</i>	23/02/2010	Permit with Conditions
03/00494/C3REG	Regulation 3	<i>Continued Siting and use of 6 classroom units (E951) (Providing 5 classrooms) for an additional temporary period without compliance with</i>	31/03/2003	No Objection

		<i>condition 2 on planning permission GR/5/95.</i>		
GR/317/97	Regulation 3	<i>Installation of a relocatable classroom unit to provide 5 no. additional classrooms at Imberhorne Lower School and remove temporary classrooms at Imberhorne Upper School.</i>	12/11/1997	No Objection
GR/010/96	Regulation 3	<i>Demolition of the existing technology block and the installation of a modular building to provide five classrooms.</i>	18/03/1996	No Objection
GR/204/95	Regulation 3	<i>The construction of a new gymnasium and stores, changing rooms and the refurbishment of existing changing facilities.</i>	07/11/1995	No Objection
GR/005/95	Regulation 3	<i>Proposed 5-unit mobile classroom technology block, including demolition of the existing sub-standard technology building.</i>	27/02/1995	No Objection
GR/158/79	Full County Consent Regulation 4	<i>Erection of a temporary classroom for use as staff room.</i>	14/08/1979	Permission

- 2.9 This planning history confirms there has been complete support for development and change on the School site including the installation of modular buildings.

Proposal and Need

- 2.10 The proposed development involves the installation of a high-quality single storey modular building to provide enhanced facilities for pupils with SEND, alongside additional accommodation for school leadership and administrative functions, as detailed in the Proposed Plan FE-01.
- 2.11 Following the demolition of the existing music classroom building (proposed for demolition under a separate prior notification application under Council reference WSCC/025/26) the proposed SEND classroom will be located on the application site.

- 2.12 As stated in the Supporting Statement, submitted in support of this application, written by the Strategic Development Manager at WSCC, the existing accommodation currently used for SEND provision is no longer fit for purpose and is unable to meet modern educational, accessibility, and safeguarding standards. The limitations of the current facilities restrict the school's ability to deliver appropriate interventions, therapeutic support, and inclusive learning environments for pupils with additional needs.
- 2.13 The proposed modular building will provide purpose-designed spaces that are adaptable, accessible, and compliant with current building regulations. These spaces will better support differentiated teaching, small-group work, sensory provision, and quiet areas essential for pupils with a range of needs.
- 2.14 The scheme is intended solely to enhance the quality and suitability of existing provision. It represents a redistribution and improvement of space rather than an expansion of capacity.
- 2.15 Drawing ref. BP-01 – Existing and Proposed Block Plan, submitted with the application confirms that the proposed new modular building is larger than the existing building. The increased size is essential to enable the school to address deficiencies in existing accommodation and enhance the learning environment for some of the most vulnerable pupils, without increasing overall school capacity, as highlighted in the WSCC Supporting Statement.

3.0 Compliance with Planning Policy

- 3.1 Section 38 (6) of the Planning and Compulsory Purchase Act 2004 and section 70(2) of the Town and Country Planning Act 1990 require planning applications to be determined in accordance with the policies in the Development Plan, unless other material considerations indicate otherwise.

The Development Plan

- 3.2 The relevant Development Plan documents for this application are the Mid Sussex District Plan (adopted March 2018) and the East Grinstead Neighbourhood Plan (made November 2016)¹. The National Planning Policy Framework (NPPF) (2024, as amended in 2025) is also a material consideration in planning decisions.
- 3.3 Mid-Sussex District Council's emerging Local Plan, the 2021 – 2040 Mid Sussex District Plan, is currently under Examination, having gone through the Stage 2 hearings last March. The Authority is currently in the process of actioning the Inspector's questions on other proposed site allocations before further consultation. As such, and based on **Paragraph 49** of the NPPF, policies within the emerging Local Plan of relevance to the proposal have also been considered and are addressed below.
- 3.4 Where these policies have received a large number of objections and unresolved issues (in line with Paragraph 49b of the NPPF), these have been excluded, and respective paragraphs, proposed for modification or deletion, have been omitted from this assessment.

Principle of Development

- 3.5 Policy **DP25: Community Facilities and Local Services** of the adopted District Plan confirms that the provision or improvement of community facilities and local services that contribute to creating sustainable communities will be supported.

¹ East Grinstead Neighbourhood Plan was prepared against the 2004 District Plan; therefore, Paragraph 31 of the NPPF (2024) may apply.

- 3.6 **Paragraph 100** of the NPPF confirms that local planning authorities should give great weight to the need to create, expand or alter early years, schools and post-16 facilities through decisions on applications.
- 3.7 **Paragraph 101** of the NPPF states that *significant weight should be placed on the importance of new, expanded or upgraded public service infrastructure when considering proposals for development.*
- 3.8 **Paragraph 125 c)** of NPPF advises that planning decisions should *give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs, proposals for which should be approved unless substantial harm would be caused.*
- 3.9 **Paragraph 128 b)** of NPPF states that local planning authorities should support proposals to *make more effective use of sites that provide community services such as schools and hospitals, provided this maintains or improves the quality of service provision and access to open space.*
- 3.10 There is therefore significant policy support at the District and National level for the principle of the proposed development.

Design and Sustainability

- 3.11 Policy **DP39: Sustainable Design and Construction** of the District Plan states that *all development proposals must seek to improve the sustainability of development and should where appropriate and feasible, according to the type and size of development and location incorporate a number of measures. These include maximising efficient use of resources, including minimising waste and maximising recycling/ re-use of materials through both construction and occupation.*
- 3.12 Policy **DP26: Character and Design** of the District Plan states that all applications will be required to (inter alia) demonstrate that development *is of high quality design and layout and includes appropriate landscaping and greenspace, protects open spaces, trees and gardens that contribute to the character of the area, 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 as well as*

demonstrating it *positively addresses sustainability considerations in the layout and the building design.*

- 3.13 Policy **DP28: Accessibility** of the adopted District Plan states that *all development will be required to meet and maintain high standards of accessibility so that all users can use them safely and easily*
- 3.14 **DPB1: Character and Design**² of the emerging Local Plan updates these requirements under policy DP26 by also stating that development should incorporate sustainable construction principles (both in terms of material as well as techniques) and is designed for adaptation to future weather events.
- 3.15 Criterion **a)** of Neighbourhood Plan Policy **EG3 – Promoting Good Design** states that planning permission will normally be granted where *the form of the proposed development is proportionate and in keeping with the scale, height, materials and site coverage of the surrounding area.* Criterion **f)** of the same policy confirms that *New development must be inclusive and, where appropriate, make satisfactory provision for the safe and easy access for those with mobility impairment.*
- 3.16 The proposed modular building is manufactured by a certified modular building manufacturer committed to sustainable construction and carbon reduction.
- 3.17 The modular classrooms are manufactured in a controlled factory environment, which provides significant environmental advantages over traditional construction. These include:
- Substantially reduced waste, with approximately 98% of construction waste segregated for recycling, far exceeding typical site-based performance.
 - Higher build quality and consistency, reducing defects and improving long-term performance.
 - Precision installation of insulation and airtightness detailing, which is difficult to achieve reliably on site.

² Policy DPB1 will replace adopted Policy DP26 on adoption of the emerging plan. It has a stronger focus on sustainability, requiring development to prioritise sustainability and incorporate (inter alia) sustainable construction principles (in terms of materials as well as techniques). Although this policy received a large number of objections, these pertained to the 20-minute neighbourhood principle.

- 3.18 These manufacturing advantages directly translate into building performance that exceeds current Building Regulations requirements.
- 3.19 This enhanced building fabric significantly reduces heat loss compared to a compliant “minimum standard” building, resulting in lower energy demand and reduced operational carbon emissions over the building’s lifetime.
- 3.20 In similar previous classroom projects, these units have demonstrated strong real-world performance, achieving EPC Band B without the use of renewable technologies, comfortably meeting regulatory requirements.
- 3.21 The materials used in construction are also selected to outperform typical specifications:
- FSC-certified timber, a renewable, low embodied carbon material that stores carbon throughout its lifecycle.
 - Rockwool insulation, containing up to 75% recycled content, improving both thermal performance and environmental impact.
 - Siniat plasterboard, with low embodied carbon (GWP typically below 20 kgCO₂e/m²) and full recyclability.
- 3.22 In addition to operational performance, modular construction delivers clear whole-life carbon advantages. The units are designed for durability, adaptability, and potential relocation, enabling reuse across multiple sites and extending service life beyond 60 years depending on the manufacturing system we use. This contrasts with traditional construction, where buildings are typically demolished at the end of use, resulting in significantly higher lifecycle carbon impacts.
- 3.23 Having regard to the above, and the location of the development within an already developed site, the proposal clearly positively addresses sustainability considerations in the layout and the building design in compliance with policies **DP26: Character and Design** and **DP39: Sustainable Design and Construction** of the adopted District Plan and draft Policy **DPB1: Character and Design** of the emerging Local Plan.

- 3.24 The proposed building will occupy a discreet site towards the northern end of the group of existing buildings. It will replace an existing single storey building and will therefore not extend the built development into undeveloped areas. As a single-storey building, it will be largely obscured from Windmill Lane and surrounding spaces by dense boundary vegetation that will be retained under the proposed development. Where it is possible to see the building it will be seen in the context of the existing School buildings on the site.
- 3.25 The flat roof of the proposed building ensures it will appear subservient to the neighbouring established School buildings. This approach will also reduce the visual impact and bulk of the building. There are other flat-roofed and low-pitched-roof buildings on the school site, and therefore, the building would not appear out of context.
- 3.26 The cladding of the building using a horizontal aluminium cladding system with a 'Corten Steel' finish is appropriate as it reflects the contemporary form of the building. At the same time, it would sit well with the use of dark brick, dark clay tiles and timber cladding used extensively across the School site.
- 3.27 To maintain the contemporary appearance, anthracite polyester powder coated double glazed casement windows are proposed with matching anthracite polyester powder coated double glazed entrance doors. The doors to the plant room will be matching steel powder coated flush doors.
- 3.28 The building will therefore be a high-quality design that will add to the overall quality of the area and be sympathetic to local character and history as required by Policy **DP26: Character and Design** of the adopted District Plan, as well as its update through the emerging plan at **DP39: Sustainable Design and Construction**, Policy **EG3 – Promoting Good Design** of the Neighbourhood Plan and **Paragraph 135 a) – c)** of the NPPF. The building will also have a step-free design and therefore offers high standards of accessibility in compliance with **Policy DP28: Accessibility** of the District Plan, Policy **EG3 f)** of the Neighbourhood Plan and **Paragraph 135 f)** of the NPPF.

Sustainable Drainage System

- 3.29 Policy **DP41: Flood Risk and Drainage**, states that *proposals for development will need to follow a sequential risk-based approach, ensure development is safe across its lifetime and not increase the risk of flooding elsewhere*. It adds that *Sustainable Drainage Systems (SuDS) should be implemented in all new developments of 10 dwellings or more, or equivalent non-residential or mixed development unless demonstrated to be inappropriate, to avoid any increase in flood risk and protect surface and ground water quality. Arrangements for the long term maintenance and management of SuDS should also be identified*.
- 3.30 Policy **DPS4: Flood Risk and Sustainable Drainage** of the emerging local plan adds to this by stating that *Surface water drainage schemes must be implemented in all new development, including replacement structures and brownfield development, unless demonstrated to be inappropriate, to avoid any increase in flood risk and protect surface and ground water quality*.
- 3.31 The submitted Foul Sewage and Surface Water Drainage Assessment confirms that the new building will be installed over an already 100% impermeable surfaced area. The Assessment confirms that the infiltration potential at the School site is negligible to poor and therefore SuDS methods on the application site are not suitable for the management of surface water runoff. No existing SuDS features (e.g. attenuation tanks or flow limiting devices) have been identified as serving the surface water drainage system at the School.
- 3.32 The primary strategy identified in the Assessment and agreed in pre-application consultation with the Lead Local Flood Authority is therefore to install bespoke SuDS Planters below rainwater downpipes on the proposed building to intercept the runoff prior to discharging into the existing piped drainage network. Drainage layout drawings are included with the Assessment and confirm this approach.
- 3.33 The Assessment concludes that this approach provides significant betterment over the existing drainage arrangement where runoff from the impermeable surfacing at the site is discharged directly into the below ground system with no SuDS features present. In contrast, the submitted Assessment estimates that the proposal will achieve a 30% reduction of runoff rates for up to a storm intensity of

50mm/hour, with more intense storms subject to a 10% reduction up to the 1 in 100-year event. This will be beneficial both for the school site and downstream public sewer network in terms of drainage capacity, despite the small-scale nature of the works.

- 3.34 Future arrangements for management of the SuDS planters are described in the Assessment.
- 3.35 The proposed connection to the public foul sewer is also described and identified on drawings within the Assessment. No anticipated increase in foul water flows discharging to the public sewer is expected under the proposal as no increase in staff and student numbers is proposed as part of the proposal.
- 3.36 A Flood Risk Assessment is not required for the development as the scale of the project is less than one hectare and is located wholly within Flood Zone 1, as indicated by the EA online flood maps for planning. Additional sources of flood risk have been reviewed and the risk of flooding from all sources, including surface water flood risk, is considered to be low.
- 3.37 This approach complies with District Plan **Policy DP41** and draft Policy **DPS4**. It is also aligned with **paragraph 172 c)** of NPPF that encourages applicants to use opportunities provided by new development to reduce the causes and impacts of flooding, (making as much use as possible of natural flood management techniques as part of an integrated approach to flood risk management). Likewise, it complies with **paragraph 164 a)** that advises that vulnerability to the range of impacts arising from climate change should be addressed in new development through suitable adaptation measures, including through incorporating green infrastructure and sustainable drainage systems.

Trees and Site Access

- 3.38 Policy **DP37: Trees, Woodland and Hedgerows** of the District Plan states that (inter alia) these will be protected by ensuring development *prevents damage to root systems and takes account of expected future growth*, as well as ensuring it *does not sever ecological corridors created by these assets*. This policy is being updated as part of the emerging District Plan through policy DPN4.

- 3.39 Policy **DPN4: Trees, Woodland and Hedgerows** adds the requirement that all *development proposed within 15 metres of any trees, measured from the trunk, will be required to submit an Arboricultural Impact Assessment and Arboricultural Method Statement prepared by a qualified arboriculturist.*
- 3.40 There are mature trees between 5-7 metres east of the proposed building. As a result, an Arboricultural Impact Assessment (AIA) Report has also been submitted with the application.
- 3.41 The AIA report confirms that the introduction of the building on the site does not require any tree removal and only minor tree surgery works to two trees (T7 and T8) are recommended with no resulting adverse impact on public visual amenity. The report notes that piled foundations are proposed to minimise any root disturbance. This is further detailed in the Tree Protection Plan in Appendix 3 of the AIA Report.
- 3.42 With respect to the delivery of the building, the Windmill Lane frontage of the School site is lined with mature trees (shown in **Figure 5**) and the AIA report confirms that a number of these are Category A and B. To ensure the crane and modular unit on lorry back do not come into contact with tree branches when accessing the site which could cause damage to the trees or vehicles, the AIA recommends minor pruning works to one tree - T1 Common Oak.
- 3.43 Standard conditions attached to the grant of planning permission will ensure the recommendations in the AIA concerning tree works and tree protection can be followed within the delivery and installation phase. This approach will ensure compliance with Policy **DP37: Trees, Woodland and Hedgerows** of the adopted District Plan, draft Policy **DPN4: Trees, Woodland and Hedgerows** of the emerging Local Plan and **paragraph 136** of the NPPF.

Traffic Generation and Parking

- 3.44 The existing and proposed buildings are located within existing hardstanding that used to serve as a car park. This car park is no longer in operation; instead, it has served as a play space with wooden benches, as previously shown in **Figures 2** and **3**, as well as a fixed table tennis table.

- 3.45 There will be no change to traffic generation and parking demands associated with the school site and its existing access arrangements for vehicles, as the proposal is to replace an existing school classroom with better quality accommodation and therefore, the number of staff and students will be unchanged by the proposal. This is confirmed in the supporting statement for the application provided by the County Council's Strategic Development Manager.



Figure 5 Access point for Imberhorne Lower School from Windmill Lane.

4.0 Conclusions

- 4.1 The supporting statement from the Strategic Development Manager of West Sussex County Council submitted in support of this application confirms that the installation of the proposed building will provide enhanced facilities for pupils with SEND, alongside additional accommodation for school leadership and administrative functions. It confirms that the existing accommodation at the School that is currently used for SEND provision is acknowledged to be life-expired, no longer fit for purpose, and unable to meet modern educational, accessibility, and safeguarding standards. It also adds that the limitations of the current facilities restrict the school's ability to deliver appropriate interventions, therapeutic support, and inclusive learning environments for pupils with additional needs. These points, together with the alignment of the project with the principles set out in the Department for Education's proposed SEND Reforms are material considerations that weigh strongly in favour of the application.
- 4.2 The principle of such development is strongly supported by both District Plan policy and the NPPF, and this statement has demonstrated that the proposal would accord with relevant national and Development Plan policy concerning design and landscaping.
- 4.3 This statement has also demonstrated that the proposed building would not only meet requirements on sustainable design, but it would also significantly exceed them in terms of thermal performance, airtightness, energy efficiency, waste reduction, and lifecycle sustainability. This results in a building solution with lower operational energy demand, reduced carbon emissions, and demonstrably improved environmental performance compared to traditional construction methods, strongly supporting the planning case. The NPPF and Local Plan policies on sustainable design are therefore complied with under this proposal.
- 4.4 This statement has also demonstrated that the proposed development would also comply with policy concerning drainage, tree protection and transport matters.
- 4.5 Paragraph 8 of the NPPF confirms that achieving sustainable development means that the planning system has three overarching objectives – the economic, social and environmental objectives - which are interdependent and need to be pursued

in mutually supportive ways (so that opportunities can be taken to secure net gains across each of the different objectives). This proposal is aligned with these objectives. The proposed development would align with the **economic** objective of delivering an improvement to local education infrastructure, helping support economic growth within the East Grinstead area; it would meet the **social** objective by supporting the local community with a new education building that better meets current and future needs. Additionally, the high-quality sustainable design, on a previously developed site that avoids tree and habitat loss, will also support the **environmental** objective.

- 4.6 Paragraph 11 of the NPPF concerns the presumption in favour of sustainable development. Part c) provides guidance for decision-making on planning applications and confirms that local planning authorities should approve development proposals that accord with an up-to-date development plan without delay. This statement has demonstrated that the proposed development complies with national and local policies and that the need for the development is a material consideration that also weighs in favour of the application. Planning permission should therefore be granted for the proposed development.