



By email only to James Emery and Steven King:

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Our ref: MWB/HM/34293

3 September 2025

Dear James and Steven,

RE: LAND EAST OF LUNCE'S HILL, HAYWARDS HEATH

On behalf of Catesby Strategic Land Limited and Rurban Estates Limited ("the Applicant"), I am pleased to enclose a set of revised planning drawings which have been prepared in response to comments submitted by planning officers and consultees in respect of the above development site.

Officers will be aware that duplicate planning submissions have been made to Lewes District Council (LDC) and Mid Sussex District Council (MSDC) due to the cross-boundary nature of the site. The relevant application reference number for Lewes District is LW/25/0071 and the relevant reference for Mid Sussex District is application is DM/25/0827.

The application is described as follows:

"Outline planning application for the erection of up to 130 dwellings, together with the change of use of an existing barn for a flexible community and/or commercial use, along with associated outdoor space and landscaping, drainage infrastructure, hard and soft landscaping, parking, access and associated works (all matters reserved except for access)."

This letter and its enclosures listed below explain the scope and nature of the proposed changes and demonstrate how the changes address the comments received to date on both applications. It also provides an update to the reports and plans submitted with the original planning application, with reference to accompanying technical addendums where relevant. This submission is accompanied by the following plans and documents:

- Illustrative Masterplan Ref: 604-P01 Rev C
- Land Use & Building Heights Parameter Plan Ref: 604-P01 Rev A
- Illustrative Landscape Strategy Ref: Edp8571_d011e
- Access Arrangement Ref: 332611520-STN-HGN-XX-DR-C-0100 P07
- Swept Path Analysis Drawing Ref: 332611520-STN-HGN-XX-DR-C-0101 P05
- Visibility Plan Ref: 332611520-STN-HGN-XX-DR-C-0102 P05



- Proposed Pedestrian Improvements Plan Ref: 332611520-STN-HGN-XX-DR-C-0104 P01
- Arboricultural Impact Assessment Ref: Edp8571_r006e – August 2025
- Design & Access Statement Addendum
- Ecological Appraisal
- BNG Assessment and Metric
- Flood Risk Assessment Ref: 794-DES-ARC-30465-FRA
- Heritage Statement Addendum
- LVIA Ref: Edp8571_r002e – August 2025
- Levels & Drainage Strategy Ref: 30465-RPS-XX-XX-DR-C-700 Rev P01
- Lighting Impact Assessment Ref: 794-DES-ARC-30465
- Noise Impact Assessment
- Sustainability and Energy Statement v3
- Structural Statement
- WSCC Comments Response Technical Note
- Residential Travel Plan
- Utilities Report

These documents are submitted in addition to the original application submission plans and documents, some of which are superseded as set out at the end of this letter.

The proposed revisions to the indicative layout for the site and the supplementary information principally focus on design & landscape, heritage, drainage, arboriculture and highway matters, which are discussed in turn below.

It should be noted that there are no changes to the quantum of development proposed nor the description of development; however, the indicative mix of homes has been revised due to the redistribution of unit types. The revised unit mix is set out in amended Accommodation Schedules enclosed.

DESIGN

A number of revisions have been made to the illustrative layout to address comments from MSDC's Urban Design Officer, Place Services, and others.

The farmstead arrangement of dwellings that was previously proposed in the north-western parcel has been revised in response to comments received from MSDC that the parcel should more closely reflect the layout of the wider development and not seek to establish a distinct, separate character.

The result is a lower density arrangement of dwellings which front onto the perimeter greenspace and vegetated site boundaries in the same way as the other parcels. Appropriate boundary treatments can be used such as low level brick with upper fencing and hedging on the public facing boundaries of these plots and the elevations of the houses help create natural surveillance over the pedestrian access around the perimeter.



FIGURE 1 – ORIGINAL ILLUSTRATIVE LAYOUT (LEFT) AND REVISED ILLUSTRATIVE LAYOUT (RIGHT)

The central area of the site has been revised to create a more prominent frontage overlooking the open space around the Pellingford Brook, with the introduction of an apartment block with a parking court to the rear. In response to comments from MSDC's Urban Design Officer, the apartment building will help to define this part of the site with a distinct hierarchy of buildings as the development transitions to the perimeter. The dwellings along the primary street will generally be up to 2.5 storeys in order to frame the primary street, establish a strong frontage, and create further hierarchy within the development. This also offers an opportunity to introduce a wider range of house types which includes those that are more appropriate to a single occupier, those looking to downsize, or first time buyers.

Carports have been proposed along the primary street to bridge the gaps between buildings and create a stronger frontage.

The illustrative landscaping scheme has been revised to include additional tree planting where space allows, which takes into account guidance relating to planting around existing utility assets which exist within the site. Numerous focal spaces are available around the site to provide natural resting and meeting spaces, which will be enhanced with the use of seating. The detailed design of external spaces will be developed at Reserved Matters stage.



FIGURE 2 – ORIGINAL ILLUSTRATIVE LAYOUT (LEFT) AND REVISED ILLUSTRATIVE LAYOUT (RIGHT)

HERITAGE

Physical Alterations

The submitted application seeks approval for the change of use of the barn into a commercial or community use as a means to bring the building back into long term use for the benefit of the wider community.

It is noted that there are concerns regarding the suitability of the building for the proposed uses ahead of a detailed application being made for listed building consent, in which the physical alterations proposed to the building would need to be agreed. To address these concerns, I am now able to provide a Structural Survey prepared by Dixon Hurst which contains details on the existing condition of the building and confirms its general suitability for conversion.

As can be seen from the enclosed photographs, the scale of the building will naturally limit the building to a low intensity use due to the need to retain the character of the building and to avoid the need for additional acoustic or plant requirements which may not be suited to this type of building. Indeed, the building would not be large enough to accommodate many standard types of occupiers, therefore flexibility for small businesses and community uses is vital to ensure its long-term use and retention. At this stage, we would envisage the building to be suitable for a local office workspace, small farm yoga studio or community space etc, although it would not be possible for any occupier to purchase or lease the building without listed building consent approval from Mid Sussex District Council on the works required.

With this in mind, the minimum number of works that are expected to be required for a base 'shell and core' will be as follows:

- Repair and/ or replacement of timber framing
- Local concrete underpinning
- Clearance of unused timber and debris
- Resurfacing of flooring
- Installation of windows and doors if necessary/required
- Installation of drainage and other works to ensure a watertight structure if needed/required
- Decoration and furnishing

Setting

The impact on the setting of the building has been tangibly reduced through the relocation of the housing parcel nearest to the site entrance, which results in the creation of a green corridor extending eastwards into the main body of the site. The nearest plot now sits approximately 70m away from the barn to the south of the entrance road, in a parcel which is tucked behind the retained boundary planting and new trees proposed within the site, which means that the plots would not be visible from much of the site entrance. Views of the parcels further back within the site, and the frontage of the eastern parcel, will be considerably softened by retained hedgerows and new tree planting within the site. This is a considerable improvement to the appreciation of the barn from the highway and to its setting.

The indicative parking area shown to the rear of the site has been reduced in size and has been shifted away from the boundary hedge line and enclosed with hedging for added screening. Some limited views of the edge of the car park will be visible from the highway and entrance into the site, however these views are expected to be minor and would be read in the context of the site as a whole.

The existing boundary wall facing Lunce's Hill will be retained and is now shown on the illustrative layout. It is set back from the highway by approximately 7.5m so will not have an impact on visibility for vehicles existing the site. The wall is also shown on the Access Arrangement Plan (reference 332611520-STN-HGN-XX-DR-C-0100).

A full response to comments submitted by MSDC's Conservation Officer, including further commentary on the building, has been prepared by Orion Heritage and is enclosed.



DRAINAGE

The revised illustrative layout is accompanied by an updated Drainage Strategy prepared by RPS which demonstrates that the surface water flood risk identified on site can mitigate and improve this risk through a landscape-led scheme of attenuation basins situated in proximity to the Pellingford Brook which runs through the centre of the site.

These attenuation basins will form part of a varied green and blue infrastructure network which will add topographical interest and stopping points for residents to enjoy as part of the open strategy, along with wider ecological benefits from local wildlife. These attenuation basins will be softened in their appearance with trees and vegetation appropriate for wet and seasonally wet environments, and will provide attractive, multi-functional green spaces for the future occupants to benefit from. Peripheral basins will also provide good opportunities to integrate the development into the adjacent landscape.

ARBORICULTURE

Comments have been received from Natural England, the Forestry Commission, the Woodland Trust and the Tree Officers from both LDC and MSDC who have made comments on the developments as it relates to trees and the adjacent Ancient Woodland.

Natural England, a statutory consultee, confirmed on 8th April 2025 that they had no objection to the original plans submitted. The response includes commentary on ancient woodland and ancient and veteran trees, noting that Natural England has produced [standing advice](#) with the Forestry Commission which should be taken into account in decision making. This standing advice is noted in the response from the Forestry Commission dated 4th April 2025.

With respect to buffer zones, the standard advice states:

"For ancient woodlands, the proposal should have a buffer zone of at least 15 metres from the boundary of the woodland to avoid root damage (known as the root protection area)."

As shown in the Design and Access Statement addendum, the indicative layout accommodates a buffer of between 19 metres and 45 metres from the standard 15 metres buffer required by the standing advice, meaning an overall offset from the woodland of between 34 metres and 60 metres. This results in a buffer of between 2x and 4x greater than the standing advice. All drainage features also fall outside the woodland buffer.

It is noted that the Woodland Trust welcome the inclusion of a larger buffer over the standard 15 metres but raised concerns about the potential recreational disturbance caused by open space within the 15 metre buffer and potential erosion within the buffer at reserved matters stage. Accordingly, the Woodland Trust suggested an increased buffer of 50 metres as a precautionary principle - this goes significantly beyond the standard advice. This view is shared by LDC's Tree Officer who submitted comments on 14th April 2025.

In response to the concerns raised with respect to recreational disturbance, the illustrative layout has been revised to include scrub planting within the 15 metre buffer which would be separated by a Sussex style fence to prevent access into the buffer by residents of the development. Scrub planting is considered to be the most suitable habitat type to discourage access in tandem with a boundary fence, as opposed to other options such as a grassland and trees.

This buffer can be secured as part of the outline approval, with any future reserved matters application needing to align with this agreed principle. The illustrative layout demonstrates

that the proposed quantum of development can be comfortably accommodated within the site with a significantly larger buffer zone between the new dwellings and Ancient Woodland than standing advice. The Woodland Trust, and all other aforementioned consultees, will have an opportunity to review the final detailed proposal for the site at reserved matters stage.

Trees T3 and T13 identified by the Woodland Trust as Veteran trees are proposed to be retained as part of the development, although T3 has been assessed as Category U. MSDC's Tree Officer concludes that T13 does not meet the criteria for a Veteran tree.

As these trees are proposed to be retained, a Veteran Tree Assessment has not been carried out on these trees. EDP uses the RAVEN2 assessment system for Veteran Trees as developed by FLAC in response to the planning precedent set out in the Brislington Meadows Appeal Decision (decision date 17 April 2023) which determines Age, Size and Condition characteristics of Veteran trees. EDF have concluded that neither T3 or T13 have sufficient size to qualify as Veteran trees using this metric. Nevertheless, the illustrative layout demonstrates that the revised arrangement for the dwellings near to T3 will be outside the buffer zone appropriate for a veteran tree.

LANDSCAPE

It is noted that Place Services, in their capacity as the consultant Landscape Officer for MSDC, is supportive of the development subject to a series of recommendations which will be discussed below.

Place Services comments that while the development would partially erode the separation between the two settlements, the proposed development does not extend south of the development line of Cape Road on the western side of the Lunce's Hill. Taking into account the recently approved Hurst Farm development, it was concluded that the development would not be completely surrounded by open countryside where it would have been perceived as protruding into the countryside with limited physical connection to other development edges. While there were some differences of opinion on some parts of the assessment, these did not substantially alter the overall concluding judgement and Place Services do not disagree with the findings.

In response to Place Services' concluding recommendations, which reflect comments from other consultees, the following revisions have been made:

- The central area of the site has been revised to contain stronger frontages which overlook and define this space as the heart of a development, with the open space to the south enhanced with additional planting and play on the way space. Additional play space is available further north.
- The previously proposed farmstead arrangement of dwellings in the north western parcel has been re designed.



- We can confirm that the wall adjacent to Lunce's Hill will be retained. This has been shown more clearly on the revised plans.
- The entrance to the site and view from Lunce's Hill has been improved through the relocation of the eastern housing parcel and creation of a green corridor to soften the gateway into the site and create a buffed edge into Haywards Heath on the approach from the south.
- Details of how the proposed attenuation features will be designed into the public open space have also been provided.

HIGHWAYS

Please find enclosed a written response to the comments submitted by West Sussex County as the Highways Authority, prepared by Stantec. Please note that we have not received any comments from East Sussex County Council at the time of writing.

ECOLOGY

Please find enclosed a revised Biodiversity Net Gain Report and accompanying metric prepared by Derek Finnie Associates. The report takes account of the revised illustrative layout and confirms that a net increase in the biodiversity value of the site is achieved for the habitat's component (11.51%), the hedgerows (12.39%) and 11.62% for watercourses.

LIGHTING AND UTILITIES

The conclusions of the Lighting Impact Assessment and Utilities Report do not change as a result of the updated illustrative layout. Please note that the proposed plan shown in the appendix has now been superseded.

SUSTAINABLE DEVELOPMENT

As noted in the Planning and Affordable Housing Statement submitted with the application, the development plans for both Lewes and Mid Sussex are out of date and neither authority can currently demonstrate a five year housing land supply, with the presumption in favour of sustainable development consequently engaged. This position was accepted by both authorities during pre-application discussions.

In accordance with paragraph 11(d) of the National Planning Policy Framework (NPPF), where a local authority cannot demonstrate a five-year supply of deliverable housing sites, planning permission should be granted unless the adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the NPPF as a whole, having particular regard to key policies for directing development to sustainable locations, making effective use of land, securing well-designed places and providing affordable homes, individually or in combination.

The development site is in a unique position whereby most of the land within the application boundary falls within Lewes District but the site is read, and would function as,

an extension to Haywards Heath which falls in Mid Sussex. Accordingly, Haywards Heath is not (and cannot be) identified as a settlement in Lewes' development plan. Nevertheless, the principle of development in Lewes adjacent to Haywards Heath has already been accepted through the allocation of Greenhill Way in the Lewes Local Plan Part 1 (see Annex A).

Since the adoption of the Lewes Local Plan (Parts 1 and 2), Lewes has recognised the presumption in favour of sustainable development and published an Interim Policy Statement which recognises that adopted planning boundaries may need to be breached in order to help meet local housing needs and seeks to guide speculative development to the most sustainable locations. As set out in the Planning and Affordable Housing Statement, it can be demonstrated that the proposed development meets the requirements of the Interim Policy Statement in all cases other than the requirement for the site to be:

"..contiguous with an adopted settlement planning boundary, as defined on the Local Plan Policies Map."

Unless the district boundaries were to change, it is not physically possible for the proposed development site to be contiguous with an adopted settlement boundary as Haywards Heath falls outside of Lewes district. However, the site does physically adjoin the defined built-up area of Haywards Heath and the defined settlement boundary as set within the MSDC District Plan, therefore this conflict is deemed to be simply administrative and it should not be disregarded as a suitable development site given the wider planning context.

It has also been demonstrated that there is only a partial conflict with MSDC's policy on the expansion of settlements (Policy DP6), namely the requirement for a development adjoining a settlement to be less than 10 dwellings. In the context of the titled balance and absence of the five year housing land supply, this conflict is deemed to be outweighed by the presumption in favour of sustainable development and the numerous benefits associated with the delivery of housing in an area with significant identified need. Officers will also be aware of the latest updates on the emerging Mid Sussex District Plan and within this context should recognise the benefit of facilitating the development of a site which lies adjacent to one of the larger towns in West Sussex while meeting some of Lewes' unmet needs in the short term.

In accessibility terms, the site is comparable in terms of distance from the town centre as the Spring Bank development immediately opposite Lunce's Hill. It is also closer to town than an outline development of up to 200 dwellings granted at appeal on Scaynes Hill Road to the east of Haywards Heath under reference DM/15/4457 in March 2018. There was no dispute between parties regarding the accessibility of the site, the entrance of which - as the crow flies - lies 2.34km away from the centre of Haywards Heath. This is a greater distance away from the centre of town than the development at Lunces Hill.

Stantec have engaged with Compass Travel (service 166), a local bus operator as suggested by WSCC, to understand how the Site could support or enhance existing facilities and services. Compass Travel suggested that based on their experience with other developments of a similar smaller scale, developers have funded free or reduced price



offer to residents to give them the opportunity to use the existing public transport provision rather than funding a new service.

It is proposed that the Developer would provide 'Compass Rover' tickets to residents, which would give unlimited travel on most Compass Travel routes for a seven-day period. It is proposed that each residential property would each be able to claim up to 28 days' worth of tickets.

In tandem, the proposals seek to improve the experience of Lunce's Hill for pedestrians through the introduction of a pedestrian connection from the site to the existing footways leading up to the bus stop, the local pub and the emerging primary school on Hurstwood Lane. The applicant also commits to a speed reduction to the south of the access, if deemed necessary by the Highway Authority(??) which would result in a reduction to 30mph and a resultant improvement to the safety of the walking environment around Lunce's Hill for both future and existing residents in the area.

The revised submission and contents of this letter demonstrate how the concerns raised by officers and consultees can be addressed in the indicative layout. In reflection of this, and the suite of benefits offered by the proposed development set out in the Planning and Affordable Housing Statement, we assert that there are no adverse impact that significantly and demonstrably outweigh the benefits of delivering context-appropriate housing on the edge of a larger town for the benefit of two districts with an absence of a five year housing land supply. Furthermore, the NPPF published in December 2024 places a particular focus on directing speculative development to sustainable locations, making effective use of land, securing well-designed places and providing affordable homes. Given the rural nature of both districts, it is vital that best use is made of land available next to larger towns with a range of shops, services, schools, community facilities and transport links, to deliver market and affordable housing for a range of occupants. The proposed development will be appropriately designed for its edge of settlement location and will sit comfortably within its immediate context adjacent to existing residential development to the north and west, and the natural boundaries established by the woodland to the east and the treeline and rising land form beyond to the south. The proposed development continues to be viewed as a proportionate and appropriate extension to Haywards Heath.

Conclusion

For completeness, the table below provides a list of all application documents and confirms how they have been affected by proposed changes to the indicative site layout. Any layout extracts contained within 'unchanged' documents are superseded.

Original Submission Document	Status	Revised / Additional Document
Air Quality Assessment	Unchanged	
Arboricultural Impact Assessment	Superseded	Edp8571_r006e – August 2025
Design and Access Statement	Unchanged	Please also refer to Design and Access Statement Addendum

Original Submission Document	Status	Revised / Additional Document
Ecological Appraisal	Superseded	
BNG Statement + Metric	Superseded	V3 – September 2025
Flood Risk Assessment	Superseded	794-DES-ARC-30465-FRA 3 September 2025
Heritage Statement	Unchanged	Please also refer to Heritage Statement Addendum & Structural Statement
Landscape and Visual Assessment	Superseded	Edp8571_r002e – August 2025
Levels and Drainage Strategy	Superseded	30465-RPS-XX-XX-DR-C-700 Rev P01
Lighting Impact Assessment	Superseded	794-DES-ARC-30465
Noise Impact Assessment Report	Superseded	2nd September 2025
Phase 1 Desk Study (Ground Conditions)	Unchanged	
Statement of Community Involvement	Unchanged	
Sustainability and Energy Statement (February 2025)	Updated to include latest layout and minor revisions associated with other technical report, but no material changes.	Sustainability and Energy Statement v3 (August 2025)
Sustainability Checklist for Major Developments	Unchanged	
Transport Assessment	Unchanged	Please also refer to Highways response.
Travel Plan	Superseded	Revision 1
Utilities Report	Superseded	794-DES-ARC-30465
Drawings		
604-L01 - Location Plan	Unchanged	-
604-P01 - Illustrative Masterplan	Superseded	604-P01 Rev C
604-P02 - Land Use & Building Heights Parameter Plan	Superseded	604-P01 Rev A
edp8571_d011 - Illustrative Landscape Strategy	Superseded	Edp8571_d011e
332611520-STN-HGN-XX-DR-C-0100 P04 - Access Arrangement	Superseded	332611520-STN-HGN-XX-DR-C- 0100 P07
332611520-STN-HGN-XX-DR-C-0101 P04 - Swept Path Analysis Drawing (Appendix F to Transport Assessment)	Superseded	332611520-STN-HGN-XX-DR- C-0101 P05
332611520-STN-HGN-XX-DR-C-0102 P03 - Visibility Plan (Appendix E to Transport Assessment)	Superseded	332611520-STN-HGN-XX-DR-C- 0102 P05



Original Submission Document	Status	Revised / Additional Document
Proposed Pedestrian Improvements Drawing	New Plan	332611520-STN-HGN-XX-DR-C-0104 P01

I trust the proposed revisions address the comments raised by consultees on the original plans. However if you have any questions or comments please do not hesitate to contact me.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'M. Bewsey'.

Mark Bewsey MRTPI

Director

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ANNEX 1 – EXTRACT OF THE LLP1 POLICY MAP FOR THE EDGE OF HAYWARDS HEATH

