

From: Nicholas Royle <Nicholas.Royle@midsussex.gov.uk>
Sent: 04 March 2026 17:34:22 UTC+00:00
To: "Steven King" <Steven.King@midsussex.gov.uk>
Cc: "Sophie Fuller" <Sophie.Fuller@midsussex.gov.uk>
Subject: Housing Comments - DM/26/0131 Land South And West Of Upper Imberhorne School Imberhorne Lane East Grinstead

Dear Steve

DM/26/0131 Land South And West Of Upper Imberhorne School Imberhorne Lane East Grinstead

Approval of Reserved Matters following Outline Planning Permission (Ref. DM/23/2699) relating to appearance, landscaping, layout and scale for 550no. new residential units.

With regards to the plans as currently submitted, I **OBJECT** to the approval of this application. The following reasons outline my issues:

The applicant is proposing a development of 550 units, which gives rise to a minimum on-site affordable housing requirement of 30% in accordance with District Plan Policy DP31. This equates to 165 affordable housing units as proposed.

The affordable housing provided will need to be split 25% Low Cost Home Ownership (42 units) and 75% Social Rented or Affordable Rented housing (123 units including the wheelchair accessible dwellings referred to below) as required by policy. As the comments for the outline permission were made prior to the change in the NPPF around the provision of First Homes, we are willing to make a compromise and allow the 42 Low Cost Home Ownership units to be split between First Homes and Shared Ownership (12.5% or 21 units for each tenure). The provision of all of the Low Cost Home Ownership properties to be delivered as Shared Ownership is not acceptable. Due to the First Homes price cap after a minimum 30% discount is £250K, it is likely that most of the First Homes will need to comprise 2 bed flats, Coach Houses/FOGS or Maisonettes with possibly a few 1 beds. If however a greater discount is provided, some or all of the First Homes could be delivered as 2 bed houses.

All Affordable Housing Units will need to meet the Council's occupancy and minimum floor area requirements, which are stated in Figure 5 of the Affordable Housing SPD. This is not currently the case as the 4 bed units are shown as being 4B/5P and not 4B/6P. This was also stated within the comments provided at Outline Permission stage.

The comments provided at Outline Permission stated that we would require approximately:

- 43 x 1B/2P flats, FOGS, maisonettes, or bungalows @ a minimum of 50m² (excluding the staircase and entrance hall in the case of any FOGS or maisonettes or 58m² including them). Maisonettes should each have their own private garden area.
- 83 x 2B/4P houses and flats (the rented units are ideally all to be houses) @ a minimum of 79m² in the case of houses (2 storey) and 70m² in the case of flats (excluding the staircase and entrance hall in the case of any FOGS or maisonettes or 79m² including them). Maisonettes should each have their own private garden area.
- 25 x 3B/5P houses @ a minimum of 93m² (2 storey) or 99m² (3 storey)
- 8 x 4B/6P houses @ a minimum of 106m² (2 storey) or 112m² (3 storey)
- 6 x wheelchair accessible dwellings for rent in the form of 4 x 1B/2P bungalows or flats @ a minimum of 60m² and each with access to its own individual private garden area and 2 x 3B/5P houses @ a minimum of 121m². All wheelchair accessible dwellings must comply with the requirements contained in Part M4(3)(1)(a) and (b) and Part M4(3)(2)(b) for wheelchair accessible dwellings as contained in category 3 – wheelchair user dwellings of schedule 1 of the Building Regulations 2010 as amended.

The submitted plans show:

- 30 x 1B/2P flats, FOGS, maisonettes, or bungalows @ a minimum of 50m² (excluding the staircase and entrance hall in the case of any FOGS or maisonettes or 58m² including them). Maisonettes should each have their own private garden area.
- 91 x 2B/4P houses and flats (the rented units are ideally all to be houses) @ a minimum of 79m² in the case of houses (2 storey) and 70m² in the case of flats (excluding the staircase and entrance hall in the case of any FOGS or maisonettes or 79m² including them). Maisonettes should each have their own private garden area.
- 31 x 3B/5P houses @ a minimum of 93m² (2 storey) or 99m² (3 storey)
- 0 x 4B/6P houses @ a minimum of 106m² (2 storey) or 112m² (3 storey) – the applicant has proposed 8 x 4B/5B (@ 110m²) units which **do not** meet our occupancy requirements
- 5 x wheelchair accessible dwellings for rent in the form of 3 x 1B/2P flats @ a minimum of 60m² and each with access to its own individual private garden area and 2 x 3B/5P houses @ a minimum of 121m². All wheelchair accessible dwellings must comply with the requirements contained in Part M4(3)(1)(a) and (b) and Part M4(3)(2)(b) for wheelchair accessible dwellings as contained in category 3 – wheelchair user dwellings of schedule 1 of the Building Regulations 2010 as amended.

I am willing to accept the number of units provided on the plans however I can not accept the 4B/5P houses. Updated plans will need to be submitted showing these as compliant 4B/6P houses. In addition to these amended plans, we will also require either the submission of a Phasing Plan with 30% affordable housing, split 25% Low Cost Home Ownership/75% social rented or affordable rented housing, included in each and every phase or confirmation that the development is being delivered in one phase.

We also stated that the location of the properties would need to meet our clustering requirement where clusters would be no larger than 10 (or 12 where flats are provided) with open market units between each cluster. This has not been adhered to as the submitted site plan shows that there are:

- 5 x clusters of 12 which do not include flats
- 2 x clusters of 15 (all flats)
- 2 x cluster of 15 (flats & houses)
- 1 x cluster of 15 (all houses)
- 1 x cluster of 11

Out of these clusters, the only ones which I would deem acceptable are the clusters of 15 flats. As the others consist of either flats and houses or houses, these can be split over the development to ensure that our clustering requirement is met. Updated plans will need to be submitted to show this.

As per the comments made at Outline Permission stage, the rented flats will need to be located in a separate block accessed via a separate core/entrance or located on a separate floor(s) to the Low Cost Homes Ownership flats and any open market flats, with individual accesses provided for any ground floor rented flats. No more than 6 x 1 bed/2 person flats for social rent or affordable rent are to be included in a block due to RP requirements. The plans submitted do generally support this, although the entrances to the ground floor flats to blocks D & E are off an internal lobby. In this instance, I am willing to accept this deviation from our previous comments.

We had previously commented that the wheelchair accessible dwellings will all need to meet the requirements contained in Part M4(3)(1)(a) and (b) and Part M4(3)(2)(b) of Schedule 1 of the Building Regulations 2010 as amended. The plans submitted do not currently meet the requirements, nor have we received the hard copies requested. Please ensure that the hard copies of these plans will need to be sent to the Council offices marked FAO Nick Royle as soon as possible so that copies can be forwarded to our OT for checking against the Part M4(3)(1)(a) and (b) and Part M4(3)(2)(b) requirements. Any changes required will need to be made and updated plans which are compliant will then need to be submitted, since the plans need to be approved by our OT prior to full planning permission being granted as stated in the affordable housing SPD. The approval of any minor final details, which are necessary in order to ensure full compliance with the requirements, will be covered by the following condition:

“Five affordable housing dwellings (3 X 1B/2P flat & 2 x 3B/5P house) shall be provided as wheelchair accessible dwellings which meet the requirements contained in Part M4(3)(1)(a) and (b) and Part M4(3)(2)(b) of Schedule 1 of the Building Regulations 2010 as amended. No above ground works shall commence on site until the Local Planning Authority has approved final plans/details for the wheelchair accessible dwellings demonstrating that all necessary requirements will be met”

Reason: To ensure that the development provides a range of house types to meet accessibility and adaptability needs to comply with Policy DP28 of the Mid Sussex District Plan.”

Should plans be submitted reflecting the above changes, I will be happy to approve the affordable housing aspect of this application.

Kind regards,
Nick

Nicholas Hewer Royle

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