

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

25th July 2025

Dear Ms Fisher,

Application Reference DM/25/1650 (the development of a new care facility (Use Class C2), a retained access from Plawhatch Lane and associated car and cycle parking and landscaping) at Horncastle Care Centre, Plawhatch Lane, Sharpthorne, East Grinstead, East Sussex, RH19 4JH

We are writing to you as immediate adjoining owners of Horncastle Care Centre (the "Site"). Our boundary abuts the Site on its eastern, western and southern sides. Whilst we support the principle of the vision for a new care facility at Horncastle Care Centre ("HCC"), there are aspects of the proposals about which we as owners of Horncastle Place ("HP") have significant concerns.

Planning policy and guidance must be considered holistically and in relation to policy objectives relating to development within the countryside. At present, there are harmful effects that outweigh the benefits.

For the avoidance of doubt, this letter is submitted as an objection to the proposed development under reference DM/25/0699, for the reasons set out below.

LANDSCAPE & ARBORICULTURE

The site falls within the countryside for planning purposes. Under paragraph 187 of the National Planning Policy Framework ("NPPF") (2024), all development proposals must respect its character and beauty. Policy DP12 of the Mid Sussex District Plan is consistent with this advice.

The current Mid Sussex Local Plan permits development within the High Weald National Landscape (formerly AONB) where it 'conserves or enhances natural beauty'. Small scale proposals which support the economy and social well-being are also considered acceptable. We do not consider the proposal to be of 'small scale'. The significant increase in the total number of bedrooms (80 for the care home, 10 with respect to the Acquired Brain Injury facility and 8 units of staff accommodation) compared to the previous facility (63 residents and 16 units of staff accommodation) will result in a noticeable increase in massing and built form. We calculate the total floor area of the existing buildings being demolished is c. 3,330 sq. m. The new care centre building will total new floor area 4,510 sq. m., an increase of some 35%. This clearly conflicts with the objective of 'conserving and enhancing the natural beauty' of the AONB.

The increase in residents and employees has the potential to increase the number of traffic movements across the Ashdown Forest that may have an adverse impact on the amount of nitrogen dioxide pollution deposited on the lowland heaths that make up the Ashdown Forest Special Protection Area (SPA) and Special Area of Conservation (SAC). We kindly ask that this be considered, alongside SANG and SAMM Contributions.

The Landscape & Visual Statement refers to the Mid Sussex Landscape Capacity Study 2007. We would ask that consideration is given to the updated Mid Sussex Landscape Capacity Study 2014. The Sites Landscape Capacity Area is on the edge of the West Hoathly – Sharpthorne High Weald (No.29). Mid Sussex's 2014 Capacity Study identifies this as having substantial landscape sensitivity and low to medium capacity for development. The Landscape & Visual Statement recommends the architectural design should carefully consider the appearance and materials of Horncastle House and the adjacent Horncastle Place. Structural and woodland planting should be proposed within the development itself, both to increase the amenity of the site and for its residents and to better absorb the proposed development into the surrounding landscape and to soften the appearance of the proposed buildings. We are of the opinion the design in its current form has not adequately considered these recommendations.

The Natural England and Forestry Commission 'standing advice' for ancient woodland, ancient trees and veteran trees is a material planning consideration for local planning authorities. It is defined as an 'irreplaceable habitat' in the NPPF. Paragraph 193 c) of the NPPF states that 'development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists.' The Arboricultural Impact Assessment ("AIA") confirms woodland located within the western boundary and to the east of the site are designated as ancient semi natural woodland. The report confirms hardstanding will be replaced in the root protection area of the ancient woodland. This could lead to further deterioration. We would be able to support the design of the scheme should the building footprint set back from the ancient woodland so as to not undermine and damage the tree roots.

We note that the tree survey and accompanying tree constraints plan dated 15/02/2024 is incorrect insofar as trees T20, T22 and G21-PA are all located on HP land beyond the care home boundary wall. We kindly ask that the relevant documents are corrected in this respect.

TRANSPORT & ACCESS

Paragraph 116 of the NPPF confirms 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 support the suggestion for sustainable transport infrastructure to mitigate some of the effect of increased vehicle movements as set out in the Transport Statement. However, the current road network does not support pedestrians or cyclists – there are no cycle lanes along Plawhatch Lane (a 60-mph highway). The Travel Plan

acknowledges this but goes on to suggest initiatives to encourage pedestrian and cycle travel. Without the right infrastructure considerations, this could lead to an increase in incidents involving pedestrians and cyclists – we could not support the increased potential for any fatalities. Unfortunately, there are no bus stops either. Having said that, we would be able to support the proposal for cycle access should the speed limit of Plawhatch Lane be reduced to 30/40 mph through a new Traffic Regulation Order.

The Transport Statement confirms over a typical weekday the replacement facility is predicted to generate an additional trip every 10 minutes. This is not insignificant. We have met with the Applicant to discuss enhancing safety on the blind bend to the east of our access (when exiting and particularly entering our property). This is off the main access to the Site where there have been a number of near collisions in the past (when fewer vehicle movements were occurring).

When we met with Edward Rimmel on site on the 16th July, he suggested a gateway feature (perhaps with speed bump?) just past the bend towards Horncastle Care Centre. We thought this was an excellent and practical suggestion with the benefits being:

- Slow traffic on the bend;
- Improve access ambiguity – care home visitors have previously periodically entered our property mistakenly believing it to be part of care home; and
- Improve security – prevent patients wandering down to the main road, which has occurred on a number of occasions in the past.

We kindly ask that such proposals are requested for inclusion by MSDC during the determination period.

FOUL DRAINAGE AND TREATMENT PLANT

It is proposed foul water flows from the proposed development will discharge into an existing sewage treatment plant (“STP”). The Planning Statement suggests this is in ‘good condition’ and has ‘sufficient capacity’.

With respect to capacity, an expansion of the number of bedrooms and bathrooms will result in significant growth of the load on the existing sewage treatment plant (STP). There are no calculations or evidence to support this, and no information is provided with respect to the capacity of the existing treatment plant. We request this information be provided as part of the foul drainage strategy for the planning application to avoid foul sewerage spills and overflows into Horncastle Wood (an ancient woodland, as set out below).

With respect to condition, the STP Inspection Report dated February 2025 at Appendix F of the Drainage Technical Note states both irrigation pumps are faulty and have been disconnected and the SSR pump has been disconnected. The notes go on to state ‘treated effluent is “trapped ” in HST as not enough forward flow’ and ‘above ground tank continues to leak but condition as before.’ This clearly conflicts the commentary in the Planning Statement and raises significant concern. In the past we have experienced foul smells from the STP/discharge area when it was

previously operational, therefore we question if the plant is safe and suitable for continued use, let alone further occupants.

In addition, the Drainage Technical Note states 'the treated discharge flows into the existing manhole to the east of the site and outfalls into the watercourse within Horncastle Wood. It is **assumed** that the remaining effluent is pumped away from the site at regular intervals'. Firstly, Horncastle Wood is ancient woodland. Secondly, assumptions have been made in the Drainage Technical Note as to how the remaining effluent is pumped away from the site which is inconsistent with our experience. Please note the existing STP sits directly on our boundary (and immediately adjacent to our other driveway). The STP was not built in accordance with previous approvals that were published on the planning portal and discharges into a ditch on our property, which is not free flowing as shown by the images below. It is blocked by fallen trees because of HCC's previous installation of this plant. The ditch is within 10m of the STP.





The other access / driveway into our property was altered by HCC without consent. HCC banked up the land, altering the topography, thereby obstructing this driveway. It is still higher in places than prior to the installation of their STP. We kindly ask that the Council and the EA (or other relevant body) need to be explicit in the requirements at planning stage for such an installation and that they are adhered to.

The boundary line of Horncastle Care Centre and Horncastle Place is along the brick wall and the upright hazel sticks in the dead hedge. Please note the plan in Appendix D of the Drainage Technical Note incorrectly shows the HCC/HP boundary line – it runs along the HCC brick wall and not down the centre of the HP driveway.

UTILITIES

No Utilities Assessment has been submitted with the application. Our 3-Phase electricity supply is via an easement under HCC. Could HCC please ensure this supply is made readily accessible and not buried under any redeveloped buildings. This also applies to HP's water and telephone lines.

SUMMARY

To conclude, it is our view that the current Planning Application should be amended to reflect the comments above. The proposals as drafted would result in harm to the landscape character of the area including the High Weald AONB and further deterioration of the ancient woodland.

The proposals will also have a harmful impact on highway safety for users of Plawhatch Lane if cyclists are introduced with no mitigation measures and of Horncastle Place at its access. Please note Horncastle Place includes holiday cottages with visitors by car. It is not a solely one residential dwelling. This should be taken into consideration in the Transport Statement. The increase in vehicle movements conflicts with the suggestion of initiatives to encourage pedestrian and cycle travel as set out in the Travel Plan.

The foul drainage strategy does not provide sufficient information to suggest the existing STP is of adequate condition and capacity, and with its discharge to Horncastle Wood, an ancient woodland, serious concern is raised. Further detail is required. A Utilities Statement should also be submitted alongside this application also.

In our opinion, the proposal is currently in conflict with well-established local and national planning policies. As mentioned, we would like to support the development but cannot do so at this time given the above matters and would kindly ask these be addressed during the determination period.

Yours sincerely,

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