

Friday 27<sup>th</sup> February 2026  
651/A3/JJA

Mr. Steven King  
Team Leader  
Major Developments  
Mid Sussex District Council  
Oakland  
Oaklands Road  
Haywards Heath  
West Sussex  
RH16 1SS

**Via the Planning Portal**

Dear Mr. King

**Re: Land West of Turners Hill Road and North of Huntsland, including land at Hurst Farm, Crawley Down, West Sussex.**

**Application submitted on behalf of Wates Developments Limited**

**Outline planning application (appearance, landscaping, layout and scale reserved) for outline application (appearance, landscaping, layout and scale reserved), for the demolition of the existing buildings on the site and the erection of up to 230 dwellings, a 70 bed care home and community facility, and associated infrastructure including new access points off of Turners Hill Road, with associated spine road and car and cycle parking, together with provision of open space, play facilities, utilities infrastructure, surface water drainage features, and associated works.**

Further to recent discussions I have pleasure in enclosing an outline planning applications (appearance, landscaping, layout and scale reserved), for the demolition of the existing buildings on the site and the erection of up to 230 dwellings, a 70 bed care home and community facility, and associated infrastructure including a new access point off of Turners Hill Road with associated spine road and car and cycle parking, together with provision of open space, play facilities, utilities infrastructure, surface water drainage features and associated works on Land west of Turners Hill Road, and north of Huntsland, including land at Hurst Farm, Crawley Down.

As you will be aware, outline planning permission was granted in September 2025 for a residential development on land north of Huntsland and west of Turners Hill Road so as to provide for 150 homes, a 70-bed care home, new public open space, footpath and cycle connections, and financial contributions towards local infrastructure and amenities. DM/25/0016 refers.

During the course of the determination of that application concern was expressed by local residents living in Wychwood Place about the fact the proposed means of access to that site was via Wychwood Place. This led the planning committee to impose an informative on the planning permission that required, when submitting the details of the Construction Management Plan to discharge condition 6, Wates investigate the possibility of obtaining construction access via Hurst Farm. As a result of this request, Wates has been exploring whether vehicular access for the development of the Land West of Turners Hill Road and North of Huntsland could be taken from Hurst Farm, and following this work acquired control of Hurst Farm to enable the vehicular access to the Land West of Turners Hill Road and North of Huntsland to be taken from this location. In doing so they have also explored the development potential of Hurst Farm itself given its identification as a proposed allocation in the Submission Draft Mid Sussex Local Plan (policy DPA10 refers), the culmination of which is this application for a comprehensive development of both the Land West of Turners Hill Road and North of Huntsland, and Hurst Farm, all being accessed from Hurst Farm, with only pedestrian, cycle and emergency access provided via Wychwood Place, which would in effect supersede that granted in September 2025 pursuant to DM/25/0016.

You will also be aware that the application site is located immediately adjacent to the current urban area of Crawley Down as identified in the Mid Sussex District Plan (2018). That said, it has also been identified as part of a proposed allocation site (DPA9), and the totality of another site (DPA10) in the Reg 19 Submission Draft Mid Sussex Local Plan 2023.

The proposed development has been designed to be in general conformity with Policies DPA9 and DPA10 of the Submission Draft Mid Sussex Local Plan, the only areas of variation being to reflect discussions with Worth Parish Council about the use of offsite contributions in lieu of the onsite provision of sports and community facilities, thus bolstering local facilities and removing any potential for conflict.

Whilst the Submission Draft Mid Sussex Local Plan is still at examination, the submission of this application now helps to demonstrate deliverability and bolster the councils five year housing land supply situation as set out in the submission draft local plan's trajectory, at a time when given recent changes to national government guidance the councils lack of a five year housing land supply under the Adopted Development Plan leaves the council vulnerable to speculative applications for development in areas that have not been judged to be suitable through the allocation process.

Given the above we have concluded that an application now is neither prejudicial to the Local Plan process nor the sustainable approach to the development of sites within the District.

In the context of the above we appreciate the fact that the starting point for the determination of this application is the Adopted Development Plan. The application site is located outside, but adjacent to, the urban area of Crawley Down as identified in the Mid Sussex District Plan (2018). Policy DP12 of the Adopted Development Plan, which indicates that the countryside will be protected in recognition of its intrinsic character and beauty, and only permits development in the area outside of built-up area boundaries on the Policies Map where it maintains or where possible enhances the quality of the rural and landscape character of the District, and is necessary for the purposes of agriculture; or is supported by a specific policy reference either elsewhere in the Plan, a Development Plan Document or relevant Neighbourhood Plan is in effect 'out of date' as the settlement boundary was defined having regard to the housing requirement for the District as set out in Policy DP4 of the Mid Sussex District which was adopted against the backdrop to the Objectively Assessed Housing Need established in the Mid Sussex Housing and Economic Development Needs Assessment (HEDNA) (February 2015), as updated in November 2015 and August 2016, and the NPPF 2012. The scale of the housing need as now identified by the new standard method and the NPPF 2024 is significantly higher than that advocated in the District Plan. As such and as the NPPF has been subject to a number of revisions since 2012, the approach adopted to the housing requirements in the Adopted District Plan is inconsistent with the NPPF 2024, and the weight to be attributed to policies DP4 and DP12 is significantly reduced and para 11d of the NPPF and the tilted balance engaged. A position which is bolstered by the fact part of the site already benefits from outline planning permission for the erection of up to 150 dwellings, a 70 bed care home (Use Class C2), ref DM/25/0016; and the fact the Council have confirmed they do not have a five year housing land supply.

This means there is a presumption in favour of sustainable development, i.e. that planning permission should be granted unless the adverse effects of doing so would significantly and demonstrably outweigh the benefits.

In the context of the above, the Planning Statement and other reports that accompany this submission clearly demonstrate that the benefits of the proposed development are significant. They include:

- a) The delivery of new homes in an area where such homes are needed. Mid Sussex District Council does not have a five-year Housing Land Supply, and these homes will assist in meeting the shortfall.
- b) The provision of affordable housing. The proposed development will provide 30% affordable housing i.e. 69 affordable homes, which will help address the affordable housing issues in the area, which are dire.
- c) The provision of a 70 bed care home which will help address the accommodation needs of the elderly in the area,
- d) The delivery of land for open space and recreational facilities that will be available not only for the future residents of the development but also for the existing residents of Crawley Down.
- e) Additional employment provision during the construction period which will generate additional spending in the local area, thus assisting in the maintenance of the vitality and viability of local services.
- f) Contributions to local services and facilities, such as health and facilities, through a S106 agreement.

Furthermore:

- a) The development will not have a detrimental impact upon the residential amenity of any neighbouring properties.
- b) The development will not have a detrimental impact upon highway safety.
- c) The development will improve public transport links between the site and the surrounding area and provide enhanced pedestrian and cycle links towards both Crawley Down and the surrounding area, including upgrades to the Public Rights of Way network.
- d) The development will create and contribute towards an enhanced highways network within Crawley Down.
- e) Adequate on-site parking would be provided to support the development.
- f) The development will not increase flood risk on site or to third party land. Indeed, overall, the surface water drainage proposal will reduce the surface water runoff from the site, providing betterment.
- g) The development will not have an unacceptable impact upon wildlife and ecology, rather it will provide for significant biodiversity net gains, in excess of the now mandatory 10%.
- h) The development will not have an unacceptable impact upon existing landscape features.

In terms of adverse effects, it is recognised that there would be localised effects on the landscape character of the site. However, the effects will be highly localised and will be focused to those landscape and visual receptors immediately adjacent to, and within, Hurst Farm. In addition, the application site is not subject to any landscape designations, and the proposed development has been developed with stakeholders to ensure the development is respectful to local landscape and visual constraints. Furthermore, it also provides for a number of beneficial effects such as an increase in landscape assets, and an improved local network of ecological and recreational spaces. On this basis and as the Council accepts that not all its housing requirement can be accommodated on brownfield sites, have already granted consent for the development of that part of the site that falls within fields 1 and 2, and have acknowledged that this site, as part of DPA9/ DPA10 is a potentially developable / deliverable site by virtue of its proposed allocation in the Submission Draft Local Plan, any localised landscape effects do not in our opinion weigh heavily against the grant of consent.

Similarly, the less than substantial harm (at the low range of that scale), to the setting and significance of the Grade II Listed Westland's that lies to the north of the application site has to be weighed against the public benefits of the application, and a balanced judgement made by the decision maker. We believe there are clear social and economic benefits arising from the proposed

development of up to 230 houses, including 69 affordable homes and 70 bed care home, on a part previously developed site. There would also be public benefits arising during the construction phase of the project and from the operational phase from additional spending in the local economy from the future residents, and there will also be environmental benefits as a result of the biodiversity net gains. As a result, we believe the benefits arising from the development outweigh the less than substantial harm (at the low range of that scale), to the setting and significance of the Grade II Westlands. Likewise, whilst there would be less than substantial harm at the low range of the scale to the setting and significance of the group of Non-Designated Heritage Assets at Huntslands, we believe the benefits arising from the development as set out above outweigh the less than substantial harm at the low range of the scale on these non-designated heritage assets

The impact on Best and Most Versatile Agricultural Land is limited in extent; and the nature of the works within the 15m buffer of the areas of Ancient Woodland have been designed so as not to impact on root protection areas or the water table negatively, thus avoiding any loss of Ancient Woodland habitat.

Specifically, the limited harm identified does not outweigh the significant benefits that have been identified; and certainly, goes nowhere near the requirement to demonstrate significant and demonstrable harm as set out in the NPPF.

Aside from the principle of development, we have also sought to address a number of other issues which are in our opinion material to the determination of this application. These include the nature of the residential accommodation and overall scale of development including the level of affordable provision; the form, layout and design of the proposed development; the landscape and visual impact of the proposed development; the effect of the proposed development on existing landscape features; the impact of the proposed development on areas of ecological interest/protected species; the impact of the proposed development on the privacy and amenity of adjacent residents; the effect of the proposed development in transportation and highway terms; the sites suitability for development in terms of flood risk and foul water drainage; the potential impact of the proposed development upon the cultural heritage of the site and surrounding area; and the effect of the proposed development on energy consumption, lighting, amenity space provision, contamination and remediation, the capacity of the service providers and impact on local infrastructure.

Having regard to the above, and given the aims and objectives of national and local planning policies we would submit that: -

- a. The proposed development will contribute to the Council's five year housing land supply requirements/ housing need;
- b. The proposed development will contribute to the Council's affordable housing requirements – overall it will provide up to 69 affordable units (30% of the units to be provided on site (assuming 230 dwellings are bought forward)), in accordance with the requirements set out in both the adopted and Reg 19 Submission Draft Local Plan;
- c. The unit mix reflects the aims and objectives of the development plan, with the scheme providing a range of house types (terraced, semi-detached, detached and apartments) and sizes (1 and 2 bed flats and 2 – 5 bed houses), to meet local demand (both market and affordable). The affordable units being evenly distributed across the site;
- d. The proposed 70 bed care home will contribute towards the Council's growing need for accommodation for the elderly;
- e. The proposed development will contribute to the Council's recreational needs, with circa 7ha of publicly accessible / incidental open space/ amenity space being provided across the development as a whole, which is circa 47% of the site area and 200% more than the policy requirement;

- f. The proposed development will contribute to the public realm, providing formal recreation opportunities, such as the proposed NEAP, LEAP and LAPs, as well as flexible play space, connected via a series of footpath networks; these features together with the introduction of an effective management regime, the creation and conservation of wildlife habitat and natural corridors, and provision of SuDS will contribute to local amenity.
- g. The illustrative layout looks to respect the existing landscape, topographical, drainage and ecological features found on the site/ site boundaries, to respect the setting of nearby heritage assets and respect the privacy and amenity of adjacent residents.
- h. At a density of circa 15.3dph gross/ 36.16dph net the proposed development seeks to make the most effective use of the application site without detracting from the character and appearance of the area.
- i. The scale and nature of the proposed development is proportionate to the size of Crawley Down and the level of day to day services found in the village and respects the spatial strategy advocated in the Reg 19 Submission Draft Local Plan.
- j. The landscape and visual effects would be localised and would not significantly affect sensitive landscape and visual receptors further from the site.
- k. None of the main arboricultural features of the site are to be removed. No ancient, veteran, category A trees or trees subject to TPO's need to be removed to accommodate the proposals. Of the 36 individual trees to be removed to accommodate the proposed development, only one is a category B tree. As this tree is screened largely screen from view by retained trees, its removal will not have a significant or detrimental impact on the character of the site or local area. Thirty of the trees to be removed are category C specimens, i.e. young, semi-mature or of small ultimate size: or of low quality, low value, or short-term potential, and the other five are category U trees i.e. trees in such a condition that they cannot realistically be retained as living trees in the context of the current land use for longer than 10 years. As a result, the arboricultural impact of this scheme is of negligible magnitude. Furthermore, as the proposed development will provide the opportunity to plant more trees/hedgerows on the site through the landscape strategy plan, it will actively enhance the landscape character of the site and surrounding area.
- l. Following detailed ecological survey work, it has been found that the site and surrounding study area is home to roosting, foraging and commuting Bats, Reptiles (Grass Snakes and Slow Worms) and breeding birds and hedgehogs. As a result, the proposed development has been designed to avoid impacts on as many ecologically sensitive areas as possible, and accommodate a number of ecological mitigation and enhancement works, all of which will ensure the protection of these species and provide biodiversity net gains in excess of 15% for onsite hedgerows and onsite habitats.
- m. The proposed development provides for a significant amount of publicly accessible amenity space that will form an integral part of the development, with all residents having access to an appropriate level of private/communal amenity space. Overall, circa 47% of the site will be publicly accessible green space.
- n. The application site is located in a highly sustainable location, that is within walking distance of day to day services and facilities, and able to maximise the use of public transport, cycling and walking.
- o. The proposed accessing arrangements have been designed to accommodate all types of predicted traffic movements. The internal road network provides for a hierarchy of different streets, all of which have been designed to ensure the car does not dominate.
- p. The proposed development looks to provide for a series of new / enhanced pedestrian and cycle links that would improve access to/ from the site to the village centre/ the surrounding area.
- q. The level of traffic generation associated with the proposed development would not, with the proposed mitigation works, result in an unacceptable traffic impact on the local highway network.

r The level of car and cycle parking provision will accord with WSCC standards and is appropriate for this location given the site's proximity to Crawley Down and its associated facilities, including public transport facilities.

s A Framework Travel Plan has been provided to demonstrate how the developer intends to try and reduce the use of the private motor car.

t The FRA and Drainage Strategy submitted with this application demonstrates that the proposed development is wholly in Flood Zone 1 and can encompass a surface water drainage strategy that can accommodate up to and including the 1% AP storm event with an appropriate allowance for climate change (of 40%), without any onsite flooding or increasing the extent of any offsite flood risk. Indeed, as set out in the FRA the proposed surface water drainage strategy will improve upon the current situation with regard to surface water management and flood risk.

u The Cultural Heritage Desk-Based Assessment (CHDBA) advises that a review of the available evidence has shown that a low to moderate archaeological potential can be assigned to the study site for Iron Age and Roman remains, and a generally low potential for all other past periods of human activity. It also advises that there is a localised raised potential for modern farm outbuilding remains shown on 19th century mapping at the northeast and southern extents of the site. As a result, the CHDBA concludes that the development proposals are considered unlikely to have a widespread or significant negative archaeological impact that would result in unacceptable harm to the archaeological resource of the site; and that the potential impact of development could be appropriately mitigated through a programme of archaeological investigation and recordings undertaken in advance of construction, if so required by the Local Planning Authority.

v The CHDBA advises that the Study Site does not contain any designated or non-designated built heritage assets; and that whilst four listed buildings lie within the vicinity of the application site, there will be a neutral effect on the setting and significance of three of these listed buildings, and less than substantial harm (at the low range of that scale), to the setting and significance of the Grade II Westlands that lies to the north of the application site. Likewise, the CHDBA advises that there would be less than substantial harm at the low range of the scale to the setting and significance of the group of Non-Designated Heritage Assets at Huntslands. Having regard to paras 215 and 216 of the NPPF, the benefits arising from the development would in our opinion outweigh the less than substantial harm identified.

w The Sustainability and Energy Statement indicates that the carbon dioxide (CO<sub>2</sub>) emissions reduction strategy for the proposals is based on the energy hierarchy to provide a rigorous methodology, which aims to reduce the carbon dioxide emissions from the development as far as possible. This is intended to be achieved through the employment of highly efficient building fabric components to reduce energy demand, and the potential inclusion of renewable and low carbon energy technologies such as air source heat pumps to serve the space and water heating demands of the proposed dwellings and deliver further carbon dioxide emissions reductions. It is anticipated that the proposed carbon dioxide emissions reduction strategy will facilitate significant carbon dioxide emissions savings compared to the Part L:2021 baseline, aiming to significantly exceed the current requirements of Mid Sussex District Council and to align with the draft policies set out within the Reg 19 Submission Draft Local Plan (Dec 2023).

x The proposed development will meet its infrastructure needs via a S106 Agreement, as long as the contributions sought are fairly and reasonable related to the scale of development proposed, such that there will be no adverse impact on day to day services.

y The proposed development generates significant economic, social and environmental benefits.

The application site is highly sustainable. Development on this site is capable of being assimilated with the wider area without detriment to the character of the area, or amenities of local residents. The landscape strategy, drainage strategy and ecological strategy will all enhance the sites nature conservation value.

On the basis of the above we believe the case for granting planning permission to be compelling, and that consent should be granted without delay.

That said we recognise that there is a considerable amount of information submitted with this application and that it will take some time to digest. As such we would ask that if you require any further information to inform your decision you do not hesitate to contact us.

Yours sincerely

  
**JUDITH ASHTON**  
**Judith Ashton Associates**

Encl

Planning Application forms and associated certificates and fee

Planning application drawings

CD-NHS-RLP-01 - Site Location Plan

#### Parameter Plans

013-01A Land Use Parameter Plan

013-02 Building Heights Parameter Plan

013-03 Density Parameter Plan

013-04A Access & Movement Parameter Plan

013-05B Green Infrastructure Parameter Plan

#### Illustrative Masterplan

1314 SK001-08 APPLICATION SITE Illustrative Masterplan North & Hurst Farm V5

1314 SK010 V1 STUDY AREA Comprehensive Illustrative Masterplan - 430 units

#### Highway Plans

ITS210013-GA-001B Proposed Access Arrangement onto Turners Hill Road

ITS210013-GA-002A Proposed Shared Pedestrian/Cycleway and Emergency Access

ITB9155-GA-103A Off-Site Improvements on Turners Hill Road

#### Documents

Design and Access Statement produced by Mosaic

Planning Statement, including Affordable Housing Statement and Draft Heads of Terms of S106 agreement produced by Judith Ashton Associates

Landscape and Visual Appraisal including Landscape Strategy produced by SLR

Arboricultural Implications Report produced by Simon Jones Associates  
Ecological Appraisal, Shadow Habitat Regulations Assessment and Biodiversity Net Gain Assessment produced by Aspect Ecology  
Cultural Heritage Desk Based Assessment produced by RPS  
Transport Assessment and Framework Travel Plan produced by iTransport  
Flood Risk Assessment produced by Ramboll  
Drainage Strategy produced by Ramboll  
Utilities Assessment produced by Ramboll  
Desk Top Geo Technical Assessment produced by Geo-Environmental Services Limited  
Sustainability and Energy Statement produced by Icini  
Agricultural Land Classification and Soil Resources Report produced by Reading Agriculture  
Lighting Impact Assessment produced by Nature Positive (an RSK company)  
Air Quality Assessment produced by RSK  
Statement of Community Involvement produced by Cratus  
Socio-Economic Benefits Infographic produced by Icini  
Sustainability Infographic produced by Icini

C.c. Jordan Van Laun Wates Developments Limited