

## Steven King

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**From:** planninginfo@midsussex.gov.uk  
**Sent:** 04 March 2025 23:49  
**To:** Steven King  
**Subject:** Mid Sussex DC - Online Register - Comments for Planning Application DM/25/0014

## Comments summary

Dear Sir/Madam,

Planning Application comments have been made. A summary of the comments is provided below.

Comments were submitted at 04/03/2025 11:49 PM.

### Application Summary

**Address:** Land West Of Turners Hill Road And South Of Huntsland Turners Hill Road Crawley Down West Sussex

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**Proposal:** Outline planning application (appearance, landscaping, layout and scale reserved) for the erection of up to 200 dwellings, and associated infrastructure including new access points off of Turners Hill Road with associated spine roads and car and cycle parking; the provision of open space and associated play facilities; utilities infrastructure, surface water drainage features, and associated features, on land west of Turners Hill Road and south of Huntsland, Crawley Down, West Sussex

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**Case Officer:** Steven King

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[Click for further information](#)

### Customer Details

**Address:** 

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### Comments Details

**Commenter Type:** Neighbour or general public

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**Stance:** Customer objects to the Planning Application

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**Reasons for comment:**

**Comments:** Formal Objection to Planning Application DM/25/0014 Land West of Turners Hill Road And South Of Huntsland, Crawley Down, West Sussex  
Dear Sir/Madam,  
I write to formally object to the proposed development under the relevant provisions of UK planning law. This objection is submitted in accordance with the Town and Country Planning Act 1990, the National Planning Policy Framework (NPPF), and relevant local planning policies. The proposal fails to adequately address key environmental, infrastructure, and flood risk concerns, posing a significant risk to the local community. Additionally, inaccuracies in government assessments, particularly regarding watercourses and drainage, have placed undue

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responsibilities on affected landowners under riparian law. My objections are detailed below.

### 1. Sustainability and Environmental Impact

The proposed development does not adhere to NPPF Section 2 (Achieving Sustainable Development), which requires planning decisions to meet present needs without compromising future generations. The failure to include the existing watercourse in the site plans is a material omission that directly conflicts with:

NPPF Paragraph 174 - requiring developments to conserve and enhance the natural environment. The misrepresentation of natural watercourses could undermine ecological stability and biodiversity.

The Environment Act 2021 - mandating measurable biodiversity net gain in development projects. The current proposal does not include sufficient measures to mitigate habitat loss or compensate for environmental damage.

Local Development Framework Policies - requiring sustainable drainage systems (SuDS) to reduce surface water flooding risks, not to enhance flood risk elsewhere.

This proposal lacks adequate mitigation for increased surface water runoff onto the southern side of the Worth Way along Wallage Lane and fails to incorporate sustainable urban drainage solutions. The absence of these measures suggests non-compliance with planning policies that prioritise climate resilience.

### 2. Drainage and Flood Risk

The proposed development presents an increased flood risk due to inaccurate and insufficient drainage assessments:

- Incorrect mapping of waterways and flood risk assessment comparing Wates flood risk survey with the recent Government survey and OS map of waterways.

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Figure 1 Inconsistency in flood risk. A. Government's national flood risk assessment. B. Ordnance survey showing actual waterways. C. Wates projected flood risk. Wates flood risk survey showing properties in Wallage lane at high risk of flooding as of today which is incorrect and in conflict with both the government's assessment and the OS exercise. Additionally, the waterways shown by Wates for Wallage lane are incorrect. Please see the Ordnance survey map (B)

- Wates Water Survey Discrepancy: The survey uses FSR modelling, which underestimates rainfall volume compared to the government's recent assessment. The quick storage estimates are likely inadequate, and modelling should be carried out using the FEH2022 rainfall model.

- Lack of Consideration for Urban Creep: The development fails to account for urban creep, which could further exacerbate surface water runoff.

- Incorrect Discharge Rate Calculation: The discharge rate should be the greenfield runoff rate for the impermeable area/positively drained area, not for the whole site. WSCC drainage consultants calculated the runoff at 4.78 L/s/ha, which Wates has not properly considered.

- Mitigation for Houses on Wallage Lane: The only way to ensure protection for homes to the south is to install a pumping station that directs water back into the main drainage channels.

These issues directly conflict with:

- NPPF Paragraph 159 - requiring developments to avoid areas at risk of flooding and ensure flood risks are not increased elsewhere.

- The Flood and Water Management Act 2010 - placing a duty on local authorities to implement effective flood risk management strategies.

- The Land Drainage Act 1991 - stating that any works affecting a watercourse must ensure proper maintenance and flow.

- The failure to acknowledge these issues could result in increased flood risk and unfair transfer of liability to local residents under riparian law.

### 3. Highways and Safety Concerns

The proposed development will significantly increase traffic levels on Turners Hill Road yet does not include substantial improvements to the existing infrastructure. Key concerns include:

- Unsafe Pedestrian Access: The proposed traffic light crossing does not provide a safe pedestrian route to the village, particularly for parents with pushchairs, cyclists, and those with mobility issues.

- Bridge Constraints: The reduced carriageway width on the bridge means that HGVs can no longer pass safely, requiring them to encroach into oncoming traPic lanes.
- Bus Stop Access Issues: Residents must navigate a convoluted route to reach the northbound bus stop, crossing the B2028 multiple times in an unsafe manner.
- TraPic Congestion: The proposed signalized pedestrian crossing at the bridge will likely severely restrict traPic flow at peak times, impacting all five junction elements (B2028 North and South, Wates' new access, Vicarage Road, and Grange Road).
- Poor Street Lighting: The junction's existing street lighting is inadequate and needs to be reassessed during the Road Safety Audit (RSA).
- Inaccurate Speed Calculations: Wates' sight line assessments are based on a monitored speed of 33.3 mph, whereas Speed Watch data shows an actual average speed of 36 mph, requiring extended sight lines.
- Obstructed Sight Lines: The southern site entrance sight line relies on removing vegetation outside Wates' ownership and is further obstructed by parked vehicles.
- Additionally, while a 20 mph speed limit may be welcomed, the proposed virtual carriageway narrowing would exacerbate congestion and reduce traPic flow efficiency. Alternative measures such as average speed cameras (NPR) would be more effective.

#### 4. S106 Contributions and Community Benefits

The proposed S106 contributions appear significantly inadequate compared to similar developments. Concerns include:

- Insufficient Financial Contributions:
- Wates' estimated S106 contributions amount to £1.2m for 350 homes and a 65-bed care home. This is significantly lower than the £14m paid by Welbeck Land for 550 homes and a 150-home care village at Imberhorne Lane. The rationale for this discrepancy needs clarification.
- 3G Pitch Commitment: Wates should commit to fully funding and constructing the 3G pitch before selling any homes, enforced through a planning condition.

#### Conclusion and Formal Objection

For the reasons outlined above, I formally object to this planning application on the grounds of:

- Failure to meet sustainability obligations under national and local planning policies.
- Deficient road and pedestrian infrastructure, creating significant public safety risks.
- Increased flood risk due to inadequate drainage considerations, contravening environmental and planning laws.
- Insufficient S106 contributions, failing to provide adequate community benefits. Given these breaches of planning law and policy, I urge the planning authority to refuse this application unless substantial amendments are made to address these concerns.

Please ensure that my objection is recorded in the consultation process, and I request written confirmation of its receipt.

Yours faithfully

[Redacted Signature]

Kind regards