

I wish to lodge a formal objection to the above referenced planning application.

1. The developer has made much of the Inspectors view. Suggesting that there was no implicit objection to the development site, provided that suitable access could be provided. However, there have been significant changes since the 2014 Planning Inspectorate Appeal Decision for the site, with new housing estates in the immediate vicinity and Planning Consent granted for further housing within Crawley Down meaning the reasoning within her report is now substantially out of date and her recommendations cannot be relied on to assume support for the current application without significant reworking. The site was allocated in the District Plan under policy SA22, The DPD clearly states that if Sycamore Lane access cannot be secured, the site should be excluded from allocation. Land ownership challenges are not justification for breaching policy. MSDC altered the site assessment to preclude access from Woodlands Close due to aggressive activities by the developer.

This planning application, with access via Woodlands Close, is a material deviation from the approved site allocation in the District Plan, without proper justification.

2. It's worth reviewing the history of attempts to obtain this access. The developer initially sought access via Sycamore Lane on the Miller Estate, as assumed by the 2014 Planning Inspectorate Appeal Decision. A significant sum of cash was offered to all residents individually plus integration of facilities and a suggestion of reduced maintenance costs by reason of increased scale. This was put to a democratic vote and firmly rejected – despite a subsequent significant increase in the cash offer. Various reasons were given by residents – resentment that the developer thought that their votes could be bought, adverse effects on benefits and taxes on the lump sum, noise, traffic, dust, road damage from construction traffic (probably over a period of 2-3 years), contractor parking in all surrounding roads etc. All of these would apply to the residents of Woodlands to a much greater degree and without any vote in the matter. According to one Woodlands resident, purchase of 9 and 11 Woodlands Close plus cash compensation to the families involved would amount to £2.5M. Something which MSDC might like to confirm, especially since, if true, it represents an average of £50k+ to be recovered from each dwelling. Hardly affordable. And certainly aggressive.

£2.5M seems an awful lot for a totally unsuitable and potentially dangerous 5 way access point which leaves one bungalow surrounded on 3 sides by busy roads, a driveway dangerously situated directly adjacent to the new access road and another driveway across the road facing the new access road. WSCC Highways can't have been looking at the same place or reading their own report:

The quoted visibility splays don't meet the required safety standards for a 30mph road. According to their own Transport Statement:

- Southbound visibility: Only 32.3m (25% below the 43m standard)
- Northbound visibility: Only 37.6m (13% below standard)

Assuming that the 30mph limit is unlikely to be exceeded, despite resident experience to the contrary is unacceptable and access should meet or exceed the required visibility splays.

The current junction between Woodlands Drive and Kiln Rd is dangerous for anyone turning right into Kiln Rd. The view is fine for cars exiting via Bramble Way but not for vehicles transitioning from Kiln Rd to Bramble Way. Worth Parish Council have raised this matter with WSCC Highways several times.

The approach along Kiln Rd is uphill along a sweeping bend which severely limits the view for those leaving Woodlands Drive but seems to encourage those heading into Bramble Way to speed. To make matters worse, there are often cars and vans parked on Kiln Rd to the right and opposite side of the junction. Thus requiring drivers to enter Kiln Rd, partially unsighted then overtake parked cars whilst also partially unsighted. The change of road priorities mandated by WSCC for the Miller Estate has proved to be a very bad decision. Now they're apparently happy to make a bad decision even worse.

3. The proposal is contrary to the requirements of District Plan Policy DP34 (Listed Buildings and Other Heritage Assets), The MSDC Conservation Officer advised that "*the proposal will result in around a mid level of harm to the special interest of Burleigh Cottage, such that the balancing exercise set out in paragraph 215 will apply.*" Further, changes following pre-application advice – those "*measures, while welcome, will reduce rather than remove the harm caused.*" I request that MSDC uphold their own District Plan and insist that further measures be taken.
4. Overdevelopment and Non-Compliance with the Neighbourhood Plan. The Crawley Down Neighbourhood Plan (CDNP), adopted in 2016, forms part of the statutory development plan and reflects the community's vision for managed, sustainable growth. Policy CDNP01 states: "*Large-scale developments that significantly expand the village envelope will not be supported unless there is an exceptional demonstrable need.*" The applicants have not demonstrated such a need.

There has already been a pattern of incremental development creep, increasing the likelihood of link or infill developments between the new housing estates and existing village boundaries, eroding the defined village envelope, and threatening the coalescence between Crawley Down and neighbouring settlements - contrary to MSDP Policy DP12 and CDNP objectives aimed at preserving village identity and open space. The cumulative effect of this plus the newly approved development of 350 houses (Wates) poses a clear risk of overdevelopment, directly conflicting with the CDNP and the spatial strategy of the Mid Sussex District Plan 2014-2031.

5. The proposed development site is located in an area with the potential for significant archaeological remains to survive. The Historic Environment Consultant has recommended a number of measures to be implemented before any development may be commenced. This implies results of those measures and approval of any proposed mitigation actions before any planning permission should be granted

6. The planning application clearly states no contaminated land and that the proposed use would not be particularly vulnerable to the presence of contamination. The Contaminated Land Consultant disagrees. *"Given the site's historical context and the proposed end use as residential housing with associated gardens and open space, there is a potential for contamination to be present that could pose a risk to human health. It is therefore recommended that a phased contaminated land assessment be undertaken."* The response details measures that should be completed before development commences and that *"Based on the findings, it may be necessary for remediation plan and validation statement to also be required"*. This implies results of those measures and approval of any proposed remediation actions be concluded before any planning permission should be granted.

Further if the applicant had replied correctly to the questions in the application form, an appropriate contamination assessment should have been supplied with the application as required by SA22. This needs to be submitted before the application can be considered further.

7. The submitted plan requires felling of a number of mature category B oak trees. Felling mature, category B oak trees is contrary to DP37 of the Mid Sussex District Plan 2014-2033. Any replanting is likely to take decades before any ecological benefit is restored to the current level. The applicant also suggests removal of a mature field boundary containing a significant number of Category B trees. Every effort should be made to retain these and plan to fully compensate any losses.
8. The Place Services report stated *"Overall, we judge that the submitted LVA is an inadequate resource in assessing the impacts on landscape character and visual amenity"* The response recommends *"that the output of the LVA is addressed, and the assessed impacts of individual landscape character areas and visual receptors are included"* As per previously noted shortcomings in the application there is an implicit requirement for this shortcoming to be addressed before any planning application be approved.
9. I may have missed the report but have not found the required Habitats Regulations Assessment (HRA). Surely this is a mandated assessment for any significant development?
10. There is a further error in the planning application in which it states a net gain of 48 dwellings. When the loss of numbers 9 and 11 Woodlands Close is taken into account, the net gain is 46.
11. The proposal is contrary to the Mid Sussex District Plan, specifically policies related to transport (DP21) and the natural environment (such as DP12, DP37, and DP38).
12. The Proposal includes 111 parking spaces of which 10 are allocated for visitors. This falls far short of the requirements of the CD Neighbourhood Plan which requires a minimum of 140 plus visitor spaces for the stated housing mix. Note that both the 2011 census and CDNP surveys illustrated a higher than average vehicle ownership and significantly higher average commute distance for residents. Government mandates on electric vehicle usage tend to imply that most of these spaces should be off-road. Motoring organisations have noted

that standard garage sizes and drive widths are too small for modern vehicles. The submitted plans do not provide adequate dimensions on these provisions.

13. Southern Water (SW) advised necessary conditions for SUDs etc and requested “*that if consent is granted, the following pre commencement condition is attached to the planning permission; The developer must advise the local authority (in consultation with Southern Water) of the landscaping proposals in proximity of public apparatus in order to protect it in accordance with Southern Water's guidance, prior to the commencement of the development.*” This Grampian condition is meaningless. Merely advising without an explicit requirement for approval and funding is pointless and a way of avoiding responsibility for a satisfactory solution. Surface water drainage relies on routing through Burleigh Woods estate without legal agreement. The Residents Management Company (RMC) has already refused such access. The developers have not provided a solution for this.
14. The Lead Local Flood Authority Flood Risk Management Team has objected to the application pending receipt and evaluation of required documentation.
15. Re Foul Water (sewage), SW have failed to mention several factors which require consideration at this stage. When the adjacent Miller Homes (Burleigh Wood) estate was built several objectors noted that the sewage infrastructure in the Woodlands area comprised pitch fibre piping, at over twice its original design life. Notoriously difficult to connect to or repair due to the material itself and deformation over the years. The developers were forced to run a parallel connection from the estate to a point opposite Larches Way on Hazel Way. Moreover, they implemented a holding tank and off-peak pumping system to reduce peak flow and ease strain on the Hazel Way pumping station.

I would ask councillors and planners to note that, in April 2014, the then parish clerk (J.Saunders) plus parish Cllrs Hitchcock and Brooks visited the pumping station and met with the area network manager. This followed a number of pollution incidents at the pumping station and a claimed refurbishment of the equipment. It appeared that the refurbishment had not included any increase in capacity or significantly updated controls. Instrumentation seen at the time, would imply that the system was working near or at full capacity (mid-late morning). The Area Manager was unable to provide any information on available network capacity and was totally unaware of major developments (Miller Phase 1 and 2) planned to connect directly to that station. He undertook to provide the figures but never did, despite the Clerk chasing. I am not aware of any significant improvement in pumping station capacity in the intervening time despite 3 developments (Hazel Rise, Miller Phases 1 &2) connecting to that station.

I would therefore strongly request that MSDC require Southern Water to provide details of existing capacity and available overhead on a peak and average basis. If considered inadequate, require that the developer obtain a commitment from Southern Water to increase capacity before occupation and identify the funding line. It should also be noted that the residents of the Miller estates have refused permission for this development to connect to their system.

General

The Design and Access Statement makes lists the adjacent developments, but fails to note the overall scale of these relative to the size of Crawley Down prior to them or the recent approval of 350 homes at Huntsland. Demand for housing in the Crawley Down area for several years is likely to be more than met by the recently approved development West of Turner's Hill Road, which includes 350 houses. Thus it is unlikely there is a demand for this housing in addition to that already approved in the immediate vicinity, and there is no need for this additional development to meet Government targets for numbers of house to be built.

The applicant claims to have engaged with local groups, including the football club, but this is disputed by Worth Parish Council and others. As such, evidence of such activity should be requested. The applicant has not even had the common courtesy to approach the resident of 7 Woodlands Close to discuss how the garage, which shares a wall with number 9 (to be demolished) will be weather proofed and left in a useable condition.

Crawley Down is already short of local school places (Infant, Primary and Secondary), with village children being turned away. West Sussex County Council's School Place Planning Strategy identifies the need to expand capacity in East Grinstead schools to meet wider area demand and has done for a good number of years. Little has been done to alleviate the situation.

The surgery (Modality Mid Sussex) is overstretched and has been put into "Special Measures" (2023) by the Care Quality Commission. I haven't found any response from NHS Sussex and they should have been consulted. This directly conflicts with NPPF para 95 which requires planning decisions to promote healthy communities by ensuring that necessary social infrastructure including health services can support new developments. The main access to the village is already a rat-run, utilities are under strain – regular power cuts especially over winter, foul water capacity has been an issue for years, water supply was improved as part of the Redrow development (land south of Grange Rd), but a pressure reducer fitted between the improved supply and the rest of the village to reduce risk of ageing pipework failing.

Perhaps if MSDC had used New Homes Bonus for its intended purpose, held utility suppliers to account and insisted that S106 infrastructure contributions be spent in the affected areas, we would not be in such a state. There is no justification for continuing to degrade quality of life in this village. Let the recent developments integrate and settle before further increasing pressure on sparse resources and diluting community cohesion.

Planning Application DM/25/1593 should be refused on the basis that it:

- Conflicts with the Crawley Down Neighbourhood Plan and Mid Sussex District Plan;
- Lacks adequate infrastructure support, particularly in healthcare, education, and highways;
- Fails to address traffic and access issues with sufficient evidence;
- Fails to provide safe and suitable access to the site and, in doing so, is not compliant with site SA22 access constraints defined in the District Plan

- Has not addressed concerns about the LVA, potential land contamination, identifying potential archaeological issues and providing mitigation as appropriate
- Has failed to address disagreements with the Burleigh Wood RMC re surface water, foul water, footpath access and access to Burleigh Woods
- Presents flood risk and environmental concerns; and
- Represents an unsustainable and uncoordinated expansion of the village envelope

I request and strongly urge councillors to refuse this application for any and all of the reasons stated above.

Thank you in anticipation