

April
2026

LAND PARCELS ADJACENT TO WORSELL DRIVE, COPTHORNE

Sustainability Statement



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Author(s)	I. Brown
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Reviewer(s)	J. Conceicao
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KEY FINDINGS

Executive Summary

Executive Summary

Savills has been appointed by Miller Homes to prepare this Sustainability Statement in support of a full planning application for two parcels of land adjacent to Worsell Drive, Cophorne.

The site is accessed via existing bell-mouth junctions from Worsell Drive and Langridge Way. The proposals comprise the erection of 69 new homes (Use Class C3), including 30% affordable housing, alongside internal access roads, landscaping and associated infrastructure.

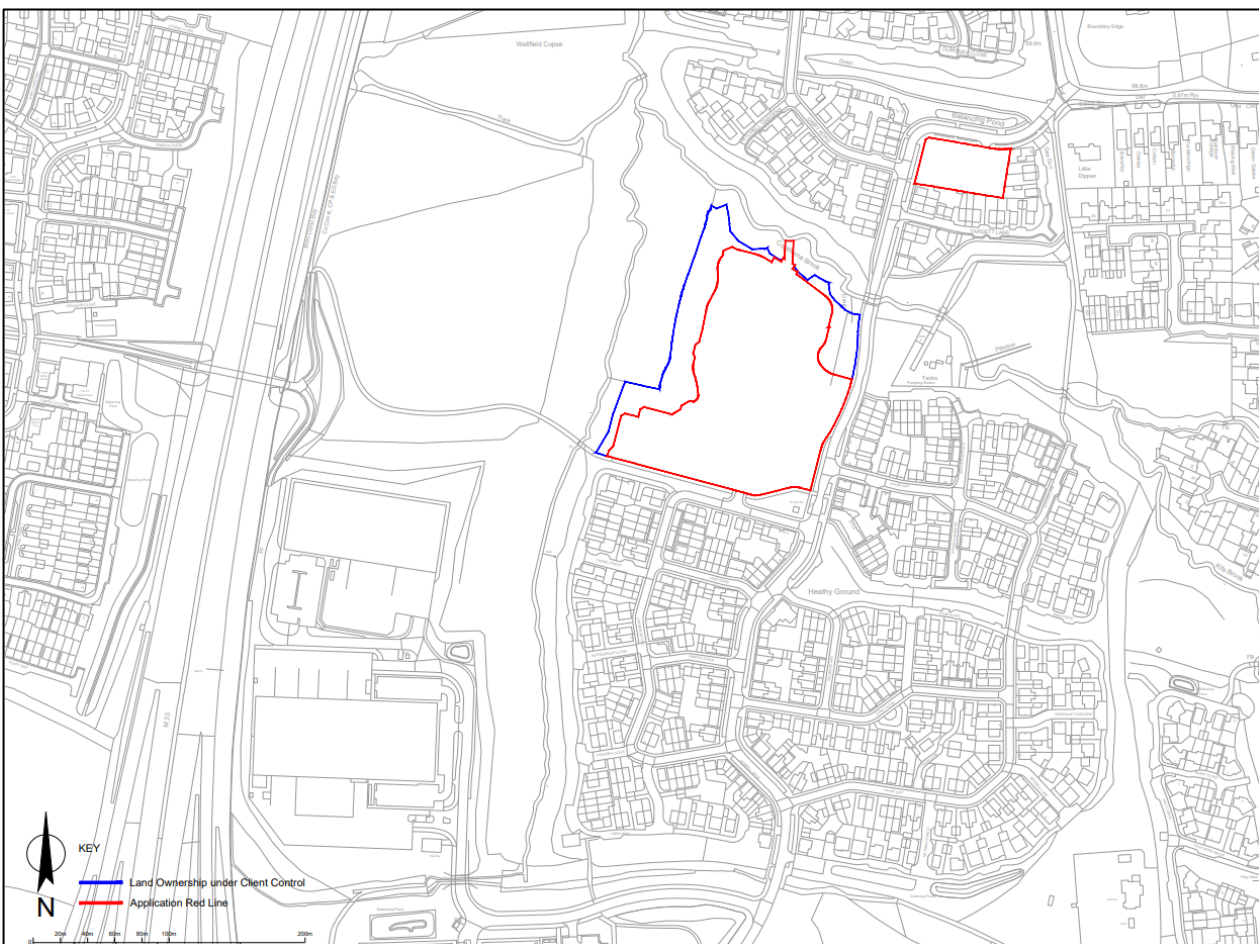
The scheme has been designed to make efficient use of the available land within the established residential context of Heathy Woods. The proposed housing mix includes 1, 2, 3 and 4-bedroom homes, all designed to meet the Nationally Described Space Standard and to provide appropriate private amenity space.

Overall, the development has been sensitively designed to integrate with its surroundings while establishing a clear identity of its own.

This report provides detail on the sustainable design features of the development and demonstrates how they relate to relevant planning policy guidance as listed below:

- National Planning Policy Framework (2024); and
- Mid Sussex District Plan 2014 - 2031 (Adopted March 2018)

Site location plan of the proposed development



The development will adopt a fabric-first approach, using enhanced insulation, improved airtightness and passive design measures to reduce energy demand and support compliance with Building Regulations Part L 2021.

This is complemented by efficient building services and the incorporation of roof-mounted solar photovoltaic panels across the dwellings, contributing to on-site renewable electricity generation and achieving a policy-compliant reduction in regulated carbon emissions compared with the Part L 2021 baseline.

The design approach also considers whole life carbon, with measures to reduce embodied carbon through material efficiency, responsible sourcing and the selection of materials with lower lifecycle impacts where practicable, in line with circular economy principles outlined in the report.

Construction waste will be minimised through good site management practices and measures to be secured via a Construction Environmental Management Plan, while operational waste will be managed through the provision of dedicated refuse and recycling facilities for future residents.

A comprehensive transport strategy supports sustainable travel by prioritising walking and cycling connectivity,

providing cycle parking and electric vehicle charging infrastructure, and promoting access to public transport within the wider Heathy Wood area.

The proposed masterplan incorporates green infrastructure and landscape enhancements, informed by arboricultural and ecological assessments. Existing habitats, including adjacent ancient woodland, are retained and protected through appropriate buffers, with ecological enhancements contributing to biodiversity net gain. The development is not expected to give rise to significant residual ecological effects following mitigation.

The site lies predominantly within Flood Zone 1, indicating a low probability of fluvial flooding. A SuDS-led drainage strategy has been developed, incorporating on-site attenuation, greenfield runoff controls and current climate change allowances to manage surface water and flood risk.

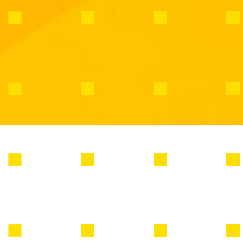
Measures to manage construction-phase noise and air quality impacts will be secured through the Construction Environmental Management Plan, while the detailed design of the dwellings will ensure appropriate internal and external acoustic conditions for future occupants.

Together, these measures demonstrate that the proposed development has been

designed to respond appropriately to relevant national and local planning policy requirements



01



OBJECTIVES OF THE REPORT

Introduction

Introduction

Savills has been appointed by Miller Homes to prepare this Sustainability Statement in support of a full planning application for two parcels of land adjacent to Worsell Drive, Copthorne. The site is accessed via existing bell-mouth junctions from Worsell Drive and Langridge Way. The proposals comprise the erection of 69 new homes (Use Class C3), including 30% affordable housing, alongside internal access roads, landscaping and associated infrastructure.

The scheme has been designed to make efficient use of the

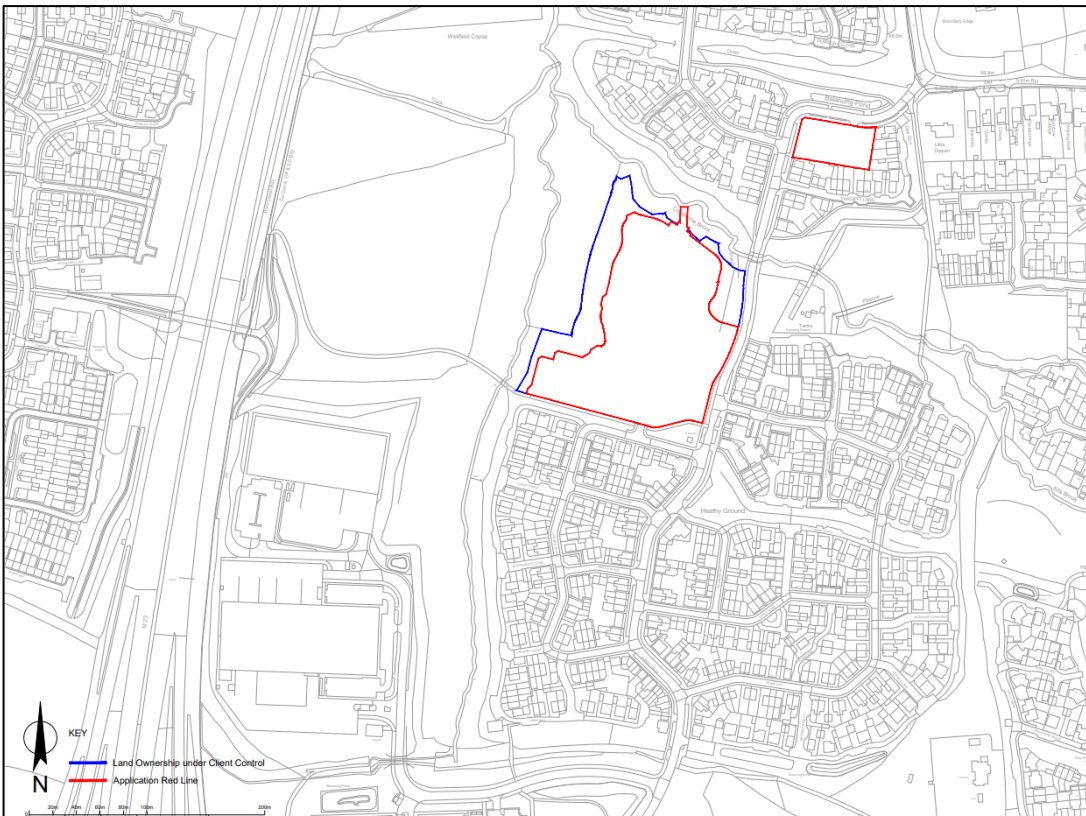
available land within the established residential context of Heathy Woods. The proposed housing mix includes 1, 2, 3 and 4-bedroom homes, all designed to meet the Nationally Described Space Standard and to provide appropriate private amenity space. Overall, the development has been sensitively designed to integrate with its surroundings while establishing a clear identity of its own.

Outline planning permission was granted for the Heathy Wood scheme in 2013 under planning reference

13/04127/OUTES. The approved application, submitted on behalf of St Modwen Developments Ltd, comprised a mixed-use neighbourhood and was supported by a suite of parameter plans defining the development framework and environmental assessment.

This report aims to outline the holistic sustainability strategy for the proposed development to facilitate the transition to a low carbon future, mitigation and adaptation to climate change, in support of the planning application.

Site location plan of the proposed development



Report Objectives

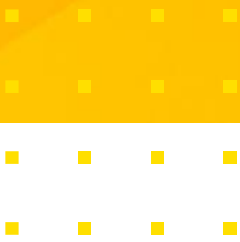
The report will target the following objectives:

- Demonstrate how the proposed development will perform against the sustainability standards set by local and national policies;
- Deliver core aims of sustainability in relation to energy consumption and operational carbon emissions, pollution, landscape, flooding, biodiversity, health and wellbeing, materials and waste, construction site impacts, transport, whole life carbon approach and circular economy;
- Identify areas for consideration to facilitate the incorporation of the principles of sustainable design and construction into the design;
- Review proportionate passive design measures and appropriate active energy strategies, including consideration of low and zero carbon technologies, demonstrating how the scheme seeks to minimise energy demand and make use of renewable generation where feasible; and
- Illustrate how the Proposed Development will increase its resilience to the impacts of climate change.

Proposed site plan



02

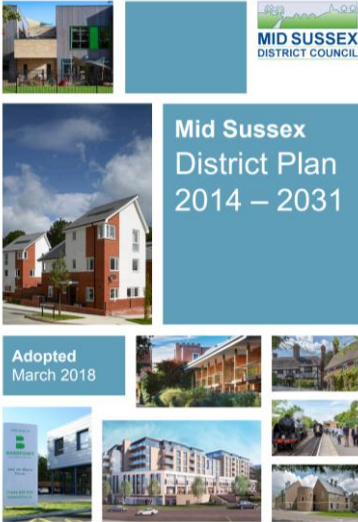


OUTLINING PLANNING CONTEXT AND REQUIREMENTS

Planning Context

Local Policy

Mid Sussex District Plan 2014 - 2031 (Adopted March 2018)



Mid Sussex District Council adopted the Mid Sussex District Plan 2014-2031 as a Development Plan Document on 28th March 2018. The adopted District Plan sets the vision and strategy, with accompanying site allocations and policies to achieve the vision and strategy.

Key policies include:

DP39: Sustainable Design and Construction

All development proposals must seek to improve the sustainability of development and should where appropriate and feasible according to the type and size of development and location, incorporate the following measures:

- Minimise energy use through the design and layout of the scheme including through the use of natural lighting and ventilation;
- Explore opportunities for efficient energy supply through the use of

communal heating networks where viable and feasible;

- Use renewable sources of energy;
- Maximise efficient use of resources, including minimising waste and maximising recycling/ re-use of materials through both construction and occupation;
- Limit water use to 110 litres/person/day in accordance with Policy DP42: Water Infrastructure and the Water Environment; and
- Demonstrate how the risks associated with future climate change have been planned for as part of the layout of the scheme and design of its buildings to ensure its longer term resilience.

DP40: Renewable Energy Schemes

Proposals for new renewable and low carbon energy projects, including community-led schemes, will be permitted provided that any adverse local impacts can be made acceptable, with particular regard to:

- Landscape and visual impacts, including cumulative impacts, such as on the setting of the South Downs National Park and High Weald Area of Outstanding Natural Beauty, and the appearance of existing buildings;
- Ecology and biodiversity, including protected species, and designated and non-designated wildlife sites; and

- Residential amenity including visual intrusion, air, dust, noise, odour, traffic generation, recreation and access. Assessment of impacts will need to be based on the best available evidence, including landscape capacity studies.

DP38: Biodiversity

Biodiversity will be protected and enhanced by ensuring development:

- Contributes and takes opportunities to improve, enhance, manage and restore biodiversity and green infrastructure, so that there is a net gain in biodiversity, including through creating new designated sites and locally relevant habitats, and incorporating biodiversity features within developments; and
- Protects existing biodiversity, so that there is no net loss of biodiversity. Appropriate measures should be taken to avoid and reduce disturbance to sensitive habitats and species. Unavoidable damage to biodiversity must be offset through ecological enhancements and mitigation measures (or compensation measures in exceptional circumstances); and
- Minimises habitat and species fragmentation and maximises opportunities to enhance and restore ecological corridors to connect natural habitats and increase coherence and resilience; and

- Promotes the restoration, management and expansion of priority habitats in the District; and
- Avoids damage to, protects and enhances the special characteristics of internationally designated Special Protection Areas, Special Areas of Conservation; nationally designated Sites of Special Scientific Interest, Areas of Outstanding Natural Beauty; and locally designated Sites of Nature Conservation Importance, Local Nature Reserves and Ancient Woodland or to other areas identified as being of nature conservation or geological interest, including wildlife corridors, aged or veteran trees, Biodiversity Opportunity Areas, and Nature Improvement Areas.

DP21: Transport

Development will be required to support the objectives of the West Sussex Transport Plan 2011- 2026, which are:

- A high quality transport network that promotes a competitive and prosperous economy;
- A resilient transport network that complements the built and natural environment whilst reducing carbon emissions over time;
- Access to services, employment and housing; and
- A transport network that feels, and is, safer and healthier to use.

DP29: Noise, Air and Light Pollution

Noise pollution:

- It is designed, located and controlled to minimise the impact of noise on health and quality of life, neighbouring properties and the surrounding area;
- If it is likely to generate significant levels of noise it incorporates appropriate noise attenuation measures; Noise sensitive development, such as residential, will not be permitted in close proximity to existing or proposed development generating high levels of noise unless adequate sound insulation measures, as supported by a noise assessment are incorporated within the development.

In appropriate circumstances, the applicant will be required to provide:

- an assessment of the impact of noise generated by a proposed development; or
- an assessment of the effect of noise by an existing noise source upon a proposed development.

Light pollution:

- The impact on local amenity, intrinsically dark landscapes and nature conservation areas of artificial lighting proposals (including floodlighting) is minimised, in terms of intensity and number of fittings; and

- The applicant can demonstrate good design including fittings to restrict emissions from proposed lighting schemes.

Air Pollution:

- It does not cause unacceptable levels of air pollution;
- Development on land adjacent to an existing use which generates air pollution or odour would not cause any adverse effects on the proposed development or can be mitigated to reduce exposure to poor air quality to recognised and acceptable levels; and
- Development proposals (where appropriate) are consistent with Air Quality Management Plans.

DP37: Trees, Woodland and Hedgerows

The District Council will support the protection and enhancement of trees, woodland and hedgerows, and encourage new planting. In particular, ancient woodland and aged or veteran trees will be protected.

Development that will damage or lead to the loss of trees, woodland or hedgerows that contribute, either individually or as part of a group, to the visual amenity value or character of an area, and/ or that have landscape, historic or wildlife importance, will not normally be permitted.

Proposals for new trees, woodland and hedgerows should be of suitable species, usually native, and where required for visual, noise or light screening purposes, trees, woodland and hedgerows should be of a size and species that will achieve this purpose.

DP41: Flood Risk and Drainage

Proposals for development will need to follow a sequential risk-based approach, ensure development is safe across its lifetime and not increase the risk of flooding elsewhere. The District Council's Strategic Flood Risk Assessment (SFRA) should be used to identify areas at present and future flood risk from a range of sources including fluvial (rivers and streams), surface water (pluvial), groundwater, infrastructure and reservoirs.

Particular attention will be paid to those areas of the District that have experienced flooding in the past and proposals for development should seek to reduce the risk of flooding by achieving a reduction from existing run-off rates.

Sustainable Drainage Systems (SuDS) should be implemented in all new developments of 10 dwellings or more, or equivalent non-residential or mixed development unless demonstrated to be inappropriate, to avoid any increase in flood risk and protect surface and ground water quality. Arrangements for the long term maintenance and management of SuDS

should also be identified.

For the redevelopment of brownfield sites, any surface water draining to the foul sewer must be disconnected and managed through SuDS following the remediation of any previously contaminated land.

SuDS should be sensitively designed and located to promote improved biodiversity, an enhanced landscape and good quality spaces that improve public amenities in the area, where possible.

The preferred hierarchy of managing surface water drainage from any development is:

1. Infiltration Measures
2. Attenuation and discharge to watercourses; and if these cannot be met,
3. Discharge to surface water only sewers.

Land that is considered to be required for current and future flood management will be safeguarded from development and proposals will have regard to relevant flood risk plans and strategies.

DP42: Water Infrastructure and the Water Environment

New development proposals must be in accordance with the objectives of the Water Framework Directive, and accord with the findings of the Gatwick Sub Region Water

Cycle Study with respect to water quality, water supply and wastewater treatment and consequently the optional requirement under Building Regulations – Part G applies to all new residential development in the district. Development must meet the following water consumption standards:

- Residential units should meet a water consumption standard of 110 litres per person per day (including external water use).

Development proposals which increase the demand for off-site service infrastructure will be permitted where the applicant can demonstrate;

- that sufficient capacity already exists off-site for foul and surface water provision. Where capacity off-site is not available, plans must set out how appropriate infrastructure improvements approved by the statutory undertaker will be completed ahead of the development's occupation; and
- that there is adequate water supply to serve the development.

Planning conditions will be used to secure necessary infrastructure provision.

Development should connect to a public sewage treatment works. If this is not feasible, proposals should be supported by sufficient information to understand the potential implications for the water environment.

The development or expansion of water supply or sewerage/sewage treatment facilities will normally be permitted, either where needed to serve existing or proposed new development, or in the interests of long term water supply and waste water management, provided that the need for such facilities outweighs any adverse land use or environmental impacts and that any such adverse impact is minimised.

Emerging Local Policy - Mid Sussex District Plan 2021 - 2039

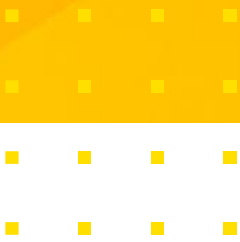
The Mid Sussex District Plan Review is the statutory process through which Mid Sussex District Council is updating and replacing the adopted District Plan (2014–2031). The emerging plan, titled Mid Sussex District Plan 2021–2039, will set the planning policy framework for future development across the district, including housing delivery, infrastructure provision, environmental protection and responses to climate change. The review is required under national planning legislation to ensure local planning policies remain up to date, effective, and aligned with the National

Planning Policy Framework, reflecting changes in evidence, local circumstances and national policy priorities.

The Submission Draft District Plan was consulted upon at Regulation 19 stage in early 2024 and formally submitted to the Planning Inspectorate in July 2024. The Plan is currently undergoing Examination in Public, during which an independent Inspector is assessing its legal compliance and soundness. Subject to the outcome of the Examination and any necessary consultation on Main Modifications, the Council anticipates adopting the District Plan 2021–2039 by the end of 2026. It should be noted that this policy is emerging and therefore carries limited weight at present.



03



ENERGY STRATEGY INCLUDING PASSIVE AND ACTIVE DESIGN MEASURES

Energy Strategy

Energy Strategy

The energy strategy for the proposed development has been prepared in accordance with national and local planning policy, including Policies DP39 and DP40 of the Mid Sussex District Plan. The approach prioritises reductions in regulated energy demand and carbon emissions through passive design, improved energy efficiency and the appropriate use of on-site renewable energy generation, in line with prevailing policy expectations.

A fabric-first strategy underpins the scheme, with enhanced building fabric performance exceeding the limiting standards set out in Part L 2021. This includes

improved U-values across key building elements, reduced air permeability and minimised thermal bridging, helping to lower heat loss, improve internal comfort and reduce space heating demand. See Table 1 below. These measures are supported by efficient building services to further reduce regulated energy use.

The energy performance of the development has been assessed using SAP modelling, with a representative range of dwelling types modelled and the results extrapolated across the site to provide a robust assessment of overall performance. In addition to fabric and efficiency measures, roof-mounted photovoltaic panels are proposed across the dwellings to generate on-site

renewable electricity and offset grid demand.

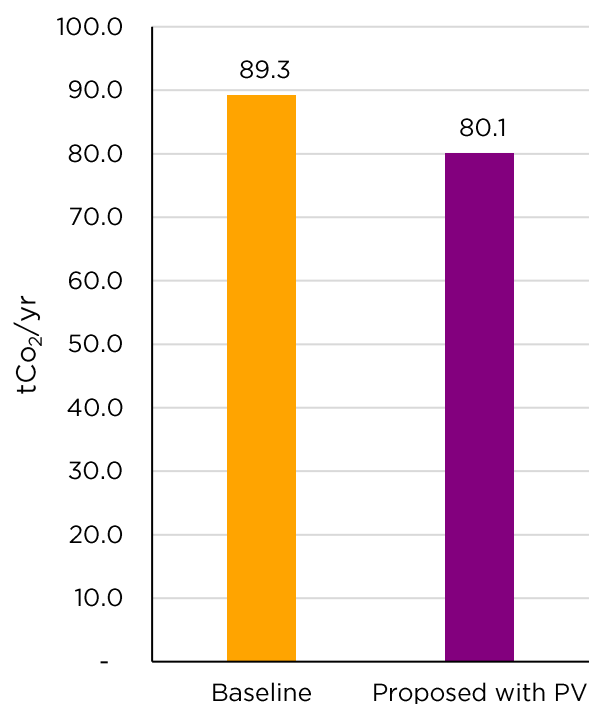
The combined impact of the enhanced fabric performance, efficient building services and on-site renewable energy generation delivers a 10.3% reduction in regulated CO₂ emissions compared with the Part L 2021 baseline, demonstrating compliance with planning policy and supporting the delivery of lower-carbon, energy-efficient homes.

For further information, please refer to the Energy Statement which has been submitted as part of this application.

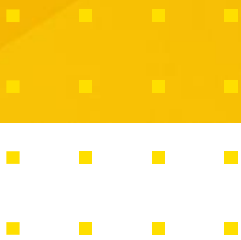
Table 1: Building fabric performance targets

Element	Part L Volume 1 - 2021 Limiting Building Fabric	Proposed Building Fabric
Roof	0.16 W/(m ² K)	0.10 W/(m ² K)
External wall	0.26 W/(m ² K)	0.18 W/(m ² K)
Exposed / ground floor	0.18 W/(m ² K)	0.13 W/(m ² K)
Windows	1.6 W/(m ² K) 0.63 g-value	1.2 W/(m ² K) 0.45 g-value
Door	1.6 W/(m ² K)	1.0 W/(m ² K)
Air permeability	8.0 m ³ /(h.m ²) @50Pa	4.0 m ³ /(h.m ²) @50Pa

Carbon emissions savings



04



UNDERSTANDING WHOLE LIFE CARBON

Whole Life Carbon

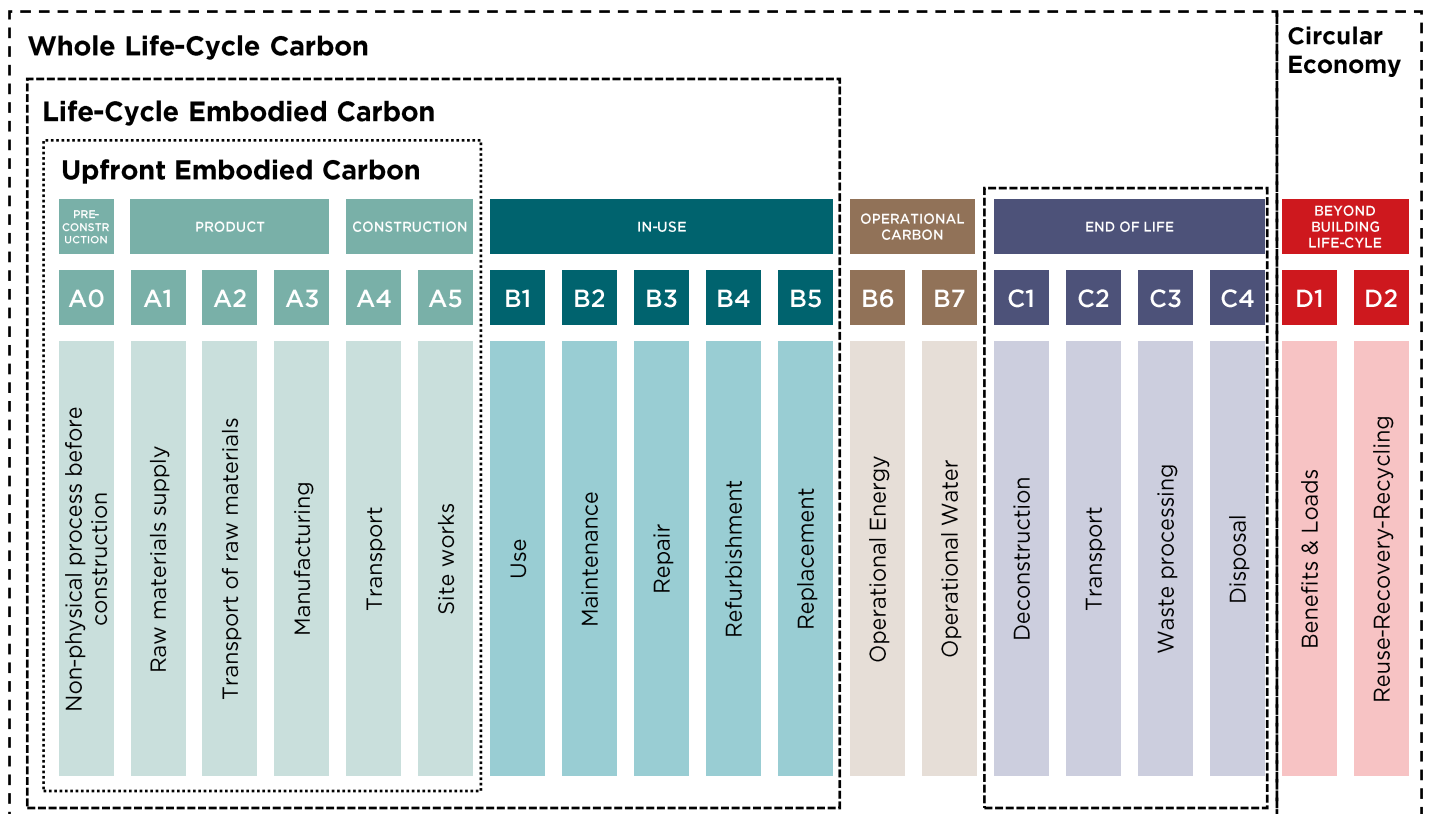
Whole Life Carbon

Whole life carbon comprises operational carbon and embodied carbon. While the previous section presents the measures to reduce operational carbon, this section provides a description of the holistic thinking, and the sustainable and circular economy practices and design options implemented to reduce the whole life carbon of the development.

- Module A0-A5: Product sourcing and construction phase.
- Module B1-B7: Use stage.
- Module C1- C4: End of life stage.
- Module D: Benefit and loads beyond the system boundary.

There are four life cycle models which account for each stage in the life of a typical project outlined in the diagram below. These include:

The different stages of the building assessment (RICS)

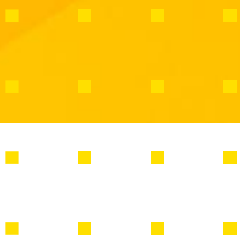


Whole life carbon reduction measures which will be considered in the design and construction phases should include and not be limited to:

- Exploring opportunities to reduce material quantities, for example through Design for Manufacture and Assembly (DfMA) techniques;
- Considering the use of cement replacement products such as fly ash or GGBS to reduce embodied carbon, and admixtures to manage setting times where feasible;
- Aiming to specify FSC (or equivalent) certified timber wherever possible;
- Prioritising responsibly and sustainably sourced materials, for example those with EPDs or sourced locally, in line with BRE Green Guide principles;
- Use of materials that are circular, and may be easily recovered, reused and recycled at the end of the proposed development's life; and
- Design strategies that enable maintenance and replacement of building components to extend service life and reduce lifecycle impacts.



05



MATERIAL CHOICE AND CONSTRUCTION WASTE

Materials and Waste

Circular economy & life cycle thinking

The proposed development adopts a circular economy approach, aiming to reduce waste, conserve resources, and extend the lifecycle of materials used in construction.

In a circular economy, waste is no longer disposed of and instead becomes the resource for future production processes. To facilitate the re-use of building materials in the future, this must be considered during the design stages of new buildings. In response to this need, the proposed development has adopted core circular economy principles that focus on the conservation of virgin resources, designing to eliminate waste and managing unavoidable waste sustainably to maintain waste

and resources at their highest value.

Construction Materials

The proposed development will give preference to the selection of sustainable materials and the minimisation of waste and will support circular economy principles (efficient use of resources, reuse of materials).

The following measures will be considered to demonstrate that the materials specified are sourced, managed and used sustainably:

- Responsible sourcing of materials from suppliers that operate an Environmental Management System (EMS)

will be prioritised;

- The use of recyclable materials, such as aggregate, will be considered; and
- The design will incorporate end-of-life considerations, facilitating disassembly and reuse of materials.



Sustainable Construction Practices

Sustainable construction practices include good site management to encourage resource efficiency, increased material recovery, and the avoidance of the disposal of waste to landfill.

As part of achieving a sustainable approach to construction, the main contractor will be encouraged to commit to reducing the impact of the construction processes on the environment. of waste to landfill.

Construction Waste

Waste reduction will be planned from project inception to completion, including consideration of standardised components, modular build, and reuse of secondary products and materials.

Operational Waste

Dedicated space will be provided for the segregation and storage of operational recyclable waste volumes generated by the proposed development, its occupants and activities. This space will be:

- Clearly labelled, to assist with segregation, storage and collection of the recyclable waste streams; and
- Accessible to building occupants for the deposit of materials and collections by waste management contractors.





06



SUSTAINABLE MOBILITY

Transport

Sustainable mobility

The proposed development has been assessed against the West Sussex Transport Plan 2022-2036, the Mid Sussex Design Guide, the Copthorne Neighbourhood Plan (CNP15), and Mid Sussex District Plan 2014 - 2031 (DP21).

Transport Statement

The Transport Statement prepared by Stantec demonstrates that the site benefits from strong opportunities for walking and cycling, supported by infrastructure already delivered as part of the wider Heathy Wood development. This includes shared pedestrian/cycle paths within and through the development, an informal woodland walk, and connections towards Copthorne Village, Forge Wood and routes in the direction of Three Bridges Station and Crawley.

The assessment also confirms that a wide range of local services and facilities are accessible by active travel, with many amenities within 1,600m (circa 20 minutes' walk) and additional destinations within a 15-minute cycle.

The site is within a short walk of bus stops on Worsell Drive served by Metrobus 281, providing connections between East Grinstead and Crawley via Copthorne.

Rail access is available via Three Bridges, Gatwick Airport and Crawley stations, which are accessible by bus services and local cycle routes, supporting travel to destinations to London and Brighton.

Vehicular access will use existing bell-mouth junctions already constructed to serve both parcels (southern via Langridge Way, northern via Worsell Drive, with northern access managed by the bus gate restrictions). Pedestrian and cycle access will be via Worsell Drive where a 2m footway and 3m shared pedestrian/cycleway have already been delivered, alongside crossing points.

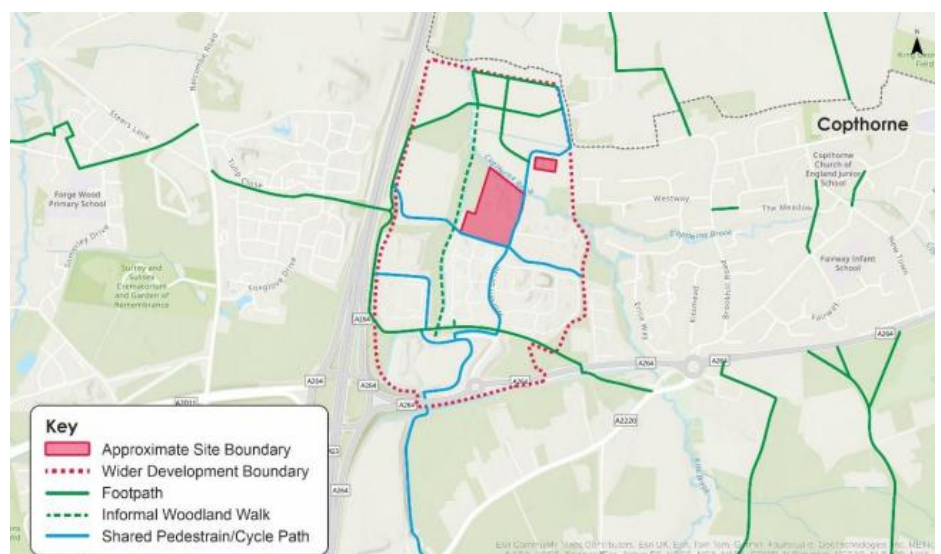
Parking is proposed in accordance with WSCC

standards, with allocated parking for all homes and visitor provision distributed across the parcels; the strategy reflects local feedback on parking, and allocated provision is set 5% above the standard.

EV charging will be provided, and cycle parking will be provided for houses (garages/sheds) with a dedicated cycle store for apartments.

Overall, the assessment concludes that the development will not result in a material impact on the local highway network and is acceptable on transport and highway grounds. For further information, please refer to the Transport Statement.

Pedestrian and cycle network (Source: Transport Assessment)



Travel Plan

The Travel Plan was prepared by Stantec. It sets out a clear package of measures to reduce reliance on single-occupancy car travel and encourage walking, cycling and public transport for residents, staff and visitors.

The plan is actively managed by an appointed Travel Plan Coordinator (Stantec), with delivery overseen through a Travel Plan Steering Group and a defined programme of monitoring and reporting.

Progress to date is evidenced through implementation and uptake, including 120 sustainable travel voucher requests, the delivery of active travel links, and the diversion of Metrobus service 281

through the site with good resident uptake.

Targets are set to deliver a 10% reduction in 12-hour weekday residential vehicle trips by Year 5, and the plan reports a 4% reduction at Year 3 (vehicle trip rate 5.205 against the agreed baseline).

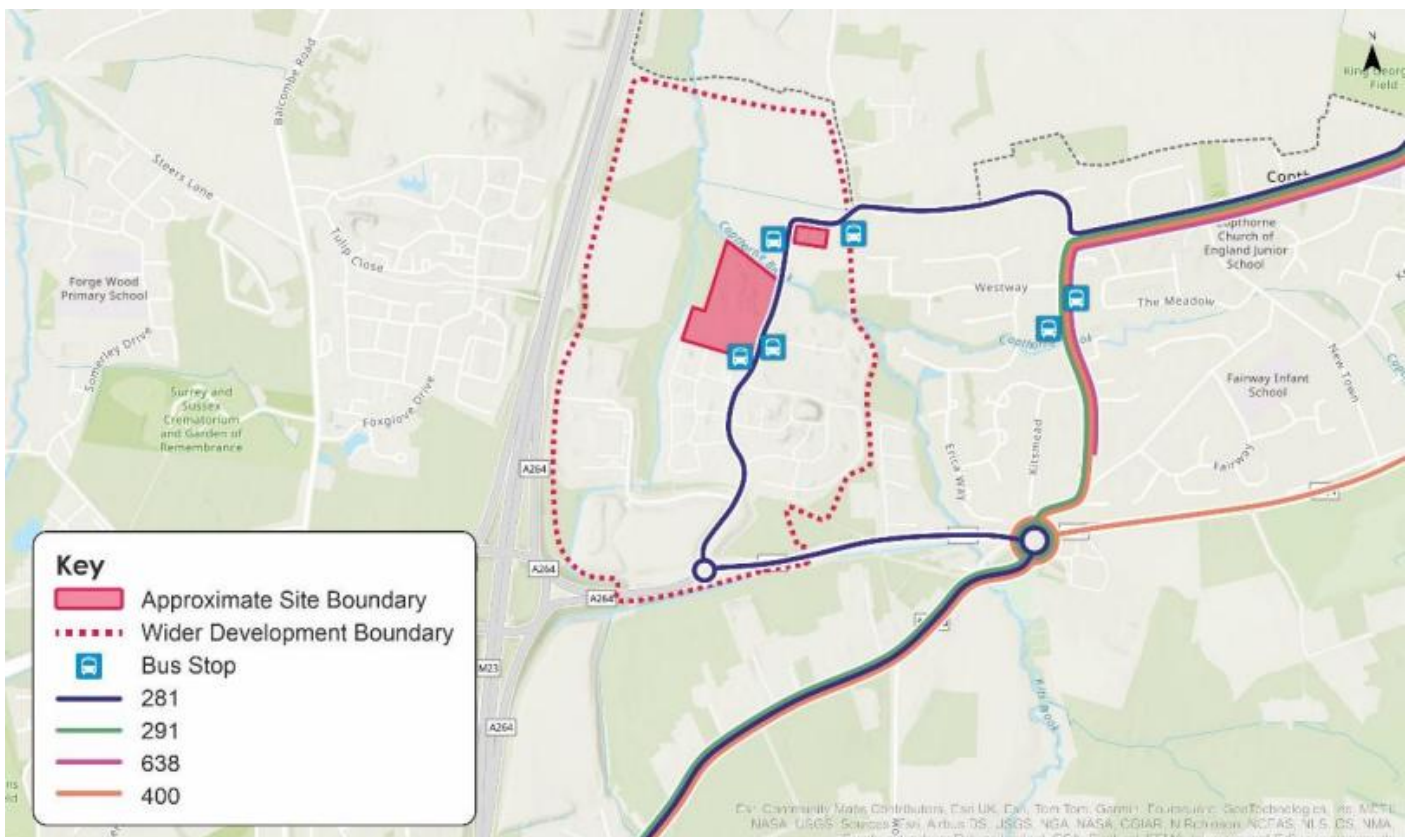
Incentives and information measures include welcome packs (updated August 2022), newsletters, and a sustainable travel voucher (up to £150), with 91 vouchers issued (including 74 cycle vouchers as of July 2024, and 14 Metrobus vouchers as of December 2024).

Where targets are not achieved, the plan sets out an agreed approach with WSCC focused on additional “soft”

measures, including (where required) a second offer of the £150 voucher.

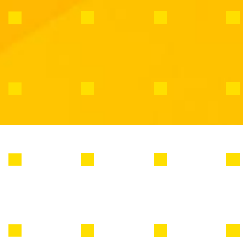
In summary, the Travel Plan provides an established and monitored framework to minimise car dependency, supported by active management, clear targets, and demonstrated delivery of measures and incentives

Existing bus network (Source: Travel Plan)





07



ECOLOGICAL VALUE OF THE SITE

Landscape, Biodiversity and Ecology

Arboriculture

The proposed development is supported by an Arboricultural Report, Impact Assessment and Method Statement prepared by SLR Consulting, using BS 5837:2012 and reflecting standing advice on ancient woodland buffers from Forestry England and Natural England.

Arboricultural Impact Assessment

The layout has been designed to protect W40 / Wellfield Copse to the west by locating development outside an ancient woodland buffer that is a minimum of 15m and extends to 20m in places, with tree protection measures forming a physical boundary to prevent

impacts on the woodland.

The assessment confirms that impacts are limited and largely avoid higher-value trees. Only two Category C trees are proposed for removal, T12 and T31, to facilitate highway and road/layby works. Where works unavoidably interact with retained trees, incursions into Root Protection Areas are described as minor.

Minor works are also identified along the woodland edge of W40 to facilitate boundary fencing and garden shed bases, with Tree Protection Fencing and an Arboricultural Method Statement setting out how sensitive activities will be managed, including the use of Horizontal Directional Drilling

(HDD) for drainage installation beneath G8 to avoid incursions into RPAs.

In summary, the arboricultural assessment confirms that the scheme has been designed to protect the adjacent ancient and semi-natural woodland (W40) through a 15–20m buffer and construction controls, with impacts limited to the removal of two Category C trees and minor, managed RPA incursions supported by a detailed method statement.

Tree protection plan (Source: Arboricultural Report)



Legend:	
	Application Boundary
	Tree of high quality and value (Category A)
	Tree of moderate quality and value (Category B)
	Tree of low quality and value (Category C)
	Tree unsuitable for retention (Category U)
	Tree (T) to be retained
	Tree Group (G), Woodland (W), Hedgerow (H) to be retained
	Ancient and Semi-Natural Woodland
	Ancient Woodland Buffer (Minimum 15m)
	Root Protection Area (RPA)
	Tree to be removed
	Indicative Tree Protection Fencing
	Alternative Tree Protection Fencing
	Supervised excavation
	Indicative Ground Protection

Biodiversity and Ecology

The proposed development has been assessed through an Ecological Impact Assessment (EclA) prepared by SLR Consulting in accordance with current CIEEM guidance, and informed by the local policy framework including the Mid Sussex District Plan 2014–2031 (DP37 and DP38).

Ecological Impact Assessment

The assessment confirms that statutory and non-statutory designated sites are present within 2km. No designated sites are expected to be impacted due to distance, lack of hydrological connectivity, and the presence of built development and major roads between the Site and those sites.

The key ecological constraint is the priority habitat woodland immediately adjacent to the Southern Parcel, including ancient woodland and deciduous woodland identified as Priority Habitats. The scheme has been designed to retain these habitats and includes a 15m ancient woodland buffer with associated protection measures. Potential construction and operational risks to adjacent woodland are identified, including pollution and increased footfall. Mitigation includes dust suppression, protective fencing to safeguard root protection zones, and post-development planting to strengthen the buffer and provide a physical

barrier between housing and woodland.

The assessment identifies the ecological features requiring detailed assessment as priority. Further technical detail and survey outputs are provided in the supporting ecological documents and technical appendices submitted as part of this application.

Biodiversity

Biodiversity Net Gain has been assessed using the Statutory Biodiversity Metric. The assessment confirms that

off-site units will be required, and the project seeks to secure 10% biodiversity gain through off-site enhancements in line with the requirements of the Environment Act.

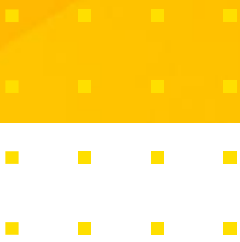
Overall, the assessment concludes that effects are not significant following mitigation, and that the proposals will deliver biodiversity gains following completion of construction and restoration activities. The only potential residual issue highlighted is a long-term predation risk to hazel dormouse linked to domestic cats associated with the completed development.

Habitats classification (Source: Ecological Impact Assessment)





08



IMPACT OF WATER

Flood Risk, Drainage and Water

Flood Risk and Drainage Strategy

The proposed development is supported by a Drainage and Flood Risk Strategy Technical Note (Rev D), prepared by Stantec to demonstrate that the surface water and foul drainage proposals for the Northern and Southern plots align with the site-wide drainage strategy (October 2017) and incorporate current climate change allowances.

Drainage and Flood Risk strategy

Flood risk has been considered with reference to the Flood Risk Assessment by Hydroland (November 2013). The site is predominantly within Flood Zone 1, with a small area in Flood Zone 2 and no Flood Zone 3. The report concludes that the development will not increase flood risk on site, locally or downstream, with no loss of floodplain storage and only minimal changes in modelled water levels.

The drainage strategy covers two parcels and follows the site-wide approach set out in the 2017 strategy. The Southern plot surface water outfall has been moved to connect into Copthorne Brook to suit the updated plot extent and site topography. The Northern plot surface water connects into the existing Worsell Drive spine road drainage infrastructure.

Surface water is designed to restrict discharge to agreed greenfield-based rates and includes allowances for the 100-year event with +40% climate change, plus +10% urban creep. The Southern plot (1.822 ha, 60.5% impermeable) discharges to Copthorne Brook at 5.2 l/s and provides 672.7 m³ of attenuation using SuDS measures including oversized pipes, attenuation storage, HydroBrake flow control and a weir wall chamber. The Northern plot (0.225 ha, 66.1% impermeable) discharges at a minimum of 5.0 l/s to reduce blockage risk and provides 30.4 m³ of attenuation using cellular storage and permeable paving.

Foul drainage from both plots is designed to drain by gravity into the existing Worsell Drive foul infrastructure. The Northern plot foul discharge rate is 0.5 l/s. The Southern plot foul discharge rate is 3.2 l/s, and the connection location has been moved further north to suit the south-to-north fall across the site.

An optioneering exercise for the Southern plot surface water confirmed that an alternative connection to an existing pipe under the spine road was not taken forward due to constraints including works within root protection areas and limited scope to increase upstream attenuation.

A pond option was also discounted due to space and lower storage performance, and attenuation crates were retained due to flexibility and capacity.

Supporting information is provided in the drainage strategy drawings for each plot.

Minimising Water Consumption

Policy DP42 of the Mid Sussex District Plan 2014–2031 requires residential development to achieve a water consumption rate of no more than 110 litres per person per day, including external water use.

Domestic water consumption in the UK has increased by more than 50% over the past 25 years, placing significant pressure on natural water resources such as rivers and reservoirs. This increase also has indirect impacts on wetland habitats and wider ecosystems. To help reduce water demand, a range of

water-efficient fittings, appliances and design measures will be incorporated wherever possible, including but not limited to the following:

- Flow restrictors & aerators - restrictors fit within the existing plumbing structure of the shower head or connection pipe to taps to restrict water flow and reduce the outlet flow and pressure. Aerators restrict the flow of water but maintain the pressure by adding air to the water giving a perception of a power shower/taps without

the water and energy use;

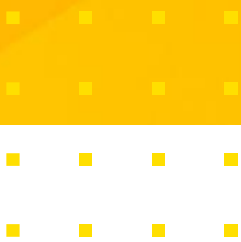
- Appliances - where dishwashers and washing machines are specified, consideration will be given to low water consuming appliances; and
- Drought resistant planting with low irrigation requirements will reduce water demand for irrigation.

As a result of these measures, the calculated water consumption for the development is 106.45 litres per person per day, which is below the Policy DP42 target of 110 litres per person per day.

Table 2: Water efficiency calculations

Installation type	Unit of measure	capacity/flow rate	Litres/person/day
WCs (dual flush)	Full flush volume (litres)	4	5.84
	Part flush volume (litres)	2.6	7.70
Taps (excluding kitchen/utility room taps)	Flow rate (litres/minute)	4	7.90
Bath (where shower also present)	Capacity to overflow (litres)	150	16.5
Shower only (where bath also present)	Flow rate (litres/minute)	9	39.33
Kitchen/utility room sink taps	Flow rate (litres/minute)	5	12.56
Washing machine	Litres/kg dry load	8.17	17.16
Dishwasher	Litres/place setting	1.25	4.50
	Calculated Use		111.48
	Normalisation factor		0.91
	Total Consumption		101.45
	Total Consumption (Building Regulations 17.K) – with external water consumption		106.45
	17.K Compliance?		Yes

09



NOISE AND AIR POLLUTION

Pollution

Noise Pollution

The proposed development has been assessed through a Noise Impact Assessment prepared by Stantec, with reference to the Mid Sussex District Plan 2014–2031 (Policy DP29) and the Planning Noise: Advice Document Sussex. The assessment also applies relevant standards and guidance including BS 8233:2014, ProPG: Planning and Noise (2017), and considers the interaction with Building Regulations, including Approved Document O (Overheating).

Noise Pollution

A Noise Impact Assessment (NIA) has been prepared by Stantec and is informed by a baseline noise survey undertaken at four locations representative of the proposed development façades. The survey confirms that road traffic is the dominant source of noise, primarily from the M23 and the local road network (including Worsell Drive), with occasional short-term higher noise events associated with aircraft overflights from Gatwick Airport.

Using the survey data and assessment methodology, the NIA concludes that most of the site falls within a low to negligible noise risk during the daytime, with medium risk principally identified at night and in limited locations close to Worsell Drive. The site is therefore considered suitable for residential use, provided

that good acoustic design is embedded within the scheme and secured through planning, including submission and implementation of an acoustic mitigation scheme.

To protect internal amenity, the assessment identifies that the building envelope should be specified (including glazing and ventilation elements) to achieve appropriate internal noise levels with windows closed. For external amenity, the majority of private gardens are predicted to achieve noise levels below 55 dB LAeq. Where higher levels are predicted in a small number of gardens along the western boundary, targeted mitigation is proposed in the form of 2 m high acoustic garden fencing along the western perimeter.

Overall, the assessment confirms that the site is suitable for residential use subject to detailed acoustic design, targeted 2 m acoustic fencing in specific gardens, and an integrated approach to ventilation and indoor comfort.

Air Pollution

The proposed development has been assessed through an Air Quality Assessment prepared by Stantec, with reference to the Mid Sussex District Plan 2014–2031 (Policy DP29) and the Mid Sussex Site Allocations DPD (Policy SA38: Air Quality), alongside relevant national planning policy and guidance including the NPPF and Planning Practice Guidance (Air Quality).

Air Quality Assessment

Baseline conditions indicate the site is not within an Air Quality Management Area (AQMA) and predicted background concentrations of NO₂, PM₁₀ and PM_{2.5} are well below the relevant national objectives, confirming the site is appropriate for residential use.

During construction, the principal risk relates to dust generation and trackout, including potential effects on nearby residents and adjacent areas of ancient woodland. A comprehensive package of IAQM-aligned dust controls will be implemented through a Construction Environmental Management Plan and Dust Management Plan (secured by planning condition), including site layout controls, dust suppression, monitoring/inspections, no-idling, avoidance of waste burning, and measures to prevent and clean trackout (e.g., road sweeping and wheel-wash where practicable). With mitigation in place, residual construction effects are assessed as not significant.

In operation, the development is expected to generate around 404 vehicle movements per day, including approximately 2 heavy vehicle movements per day. Although a small proportion of trips may pass through the Crawley AQMA, the assessment concludes that impacts are expected to be negligible and therefore not significant.

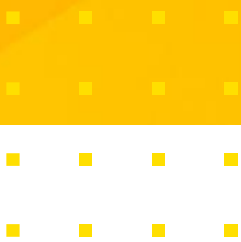
Overall, the Proposed Development is considered to be in accordance with the requirements of the NPPF, and relevant national and local planning policy and guidance regarding air quality, including the interim PM2.5 guidance. Therefore, the scheme is considered to be acceptable from the perspective of air quality.

IAQM Construction Dust band Criteria from the Site boundary (Source: Air Quality Assessment)





10



A SUMMARY OF COMMUNITY ENGAGEMENT AND SOCIAL SUSTAINABILITY

Community involvement

Community involvement

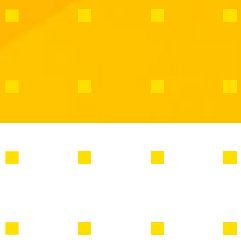
Statement of community involvement

A Statement of Community Involvement (SCI) has been prepared by Savills on behalf of Miller Homes to accompany the full planning application for 69 new homes on land parcels adjacent to Worsell Drive, Copthorne. The SCI explains the approach to consultation and summarises stakeholder engagement and public feedback undertaken between October 2024 and January 2025, in line with national and local expectations for early engagement.

Engagement comprised pre-application discussions with Mid Sussex District Council (including a formal pre-application meeting in October 2024 and written feedback received in December 2024) alongside a programme of public consultation delivered through an online information page, direct mail to local residents, and an in-person exhibition event. The public consultation included a dedicated webpage and email address launched on 25 November 2024, leaflet distribution to 590 addresses, and a staffed public exhibition at the Heathy Wood sales centre on 4 December 2024, attended by over 120 members of the community.

The SCI reports 49 formal responses, with common concerns relating to perceived overdevelopment, parking/traffic implications, and the amount of green/open space, alongside positive feedback on landscaping, pedestrian routes and affordable housing. The applicant response includes design changes and clarifications, including a reduction in the scheme from 77 homes to 69, increased provision of green/open space (including a larger green area in the south-eastern corner of the southern parcel), and inclusion of a community orchard and amenity features to support community use.

11



A SUMMARY OF THE HOLISTIC SUSTAINABLE APPROACH

Conclusion

Conclusion

This Sustainability Statement sets out how the proposed development at Land Parcels adjacent to Worsell Drive, Copthorne has been designed in accordance with relevant national and local planning policy relating to sustainable development.

The Statement has been prepared with reference to the following key policy and guidance documents:

- National Planning Policy Framework (2024); and
- Mid Sussex District Plan 2014–2031 (Adopted March 2018).

This report demonstrates that the proposed development responds positively to adopted policy requirements relating to sustainable development. In particular, the scheme:

- Makes efficient use of land within the established residential context of the wider Heathy Wood development;
- Adopts a fabric-first approach to reduce energy demand through enhanced building fabric performance, including improved U-values, reduced air permeability and minimised thermal bridging, in accordance with Part L 2021;

- Incorporates roof-mounted solar photovoltaic (PV) panels to contribute to on-site renewable electricity generation and achieve a policy-compliant reduction in regulated carbon emissions;
- Accounts for overheating risk through passive design measures, with ventilation, acoustic performance and overheating addressed in a coordinated manner at detailed design stage;
- Implements a SuDS-led drainage strategy, incorporating on-site attenuation, greenfield runoff controls and current climate-change allowances to manage surface water and flood risk;
- Minimises construction and operational waste through good site management practices, application of circular economy principles and provision of dedicated refuse and recycling facilities;
- Includes appropriate measures to mitigate noise and air quality impacts during construction and operation, secured through a Construction Environmental Management Plan and detailed technical assessments;

- Protects and enhances biodiversity through the retention of existing habitats, buffers to adjacent ancient woodland, on-site ecological enhancements and delivery of statutory 10% Biodiversity Net Gain via off-site provision;
- Delivers a landscape-led masterplan incorporating green infrastructure that supports visual amenity, ecological function and resident wellbeing; and
- Supports sustainable travel patterns through walking and cycling connectivity, EV charging provision, cycle storage and an actively managed Travel Plan.

Overall, the proposed development at Land Parcels adjacent to Worsell Drive, Copthorne demonstrates a comprehensive and proportionate approach to sustainable development, addressing energy efficiency, water management, biodiversity, pollution control and sustainable transport. The scheme accords with adopted national and local planning policy and will deliver a high-quality residential environment that is resilient to future environmental and climatic pressures.

Contacts

Imogen Brown

Consultant

imogen.brown@savills.com

Joanna Conceicao

Director

joanna.conceicao@savills.com

Savills.com

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