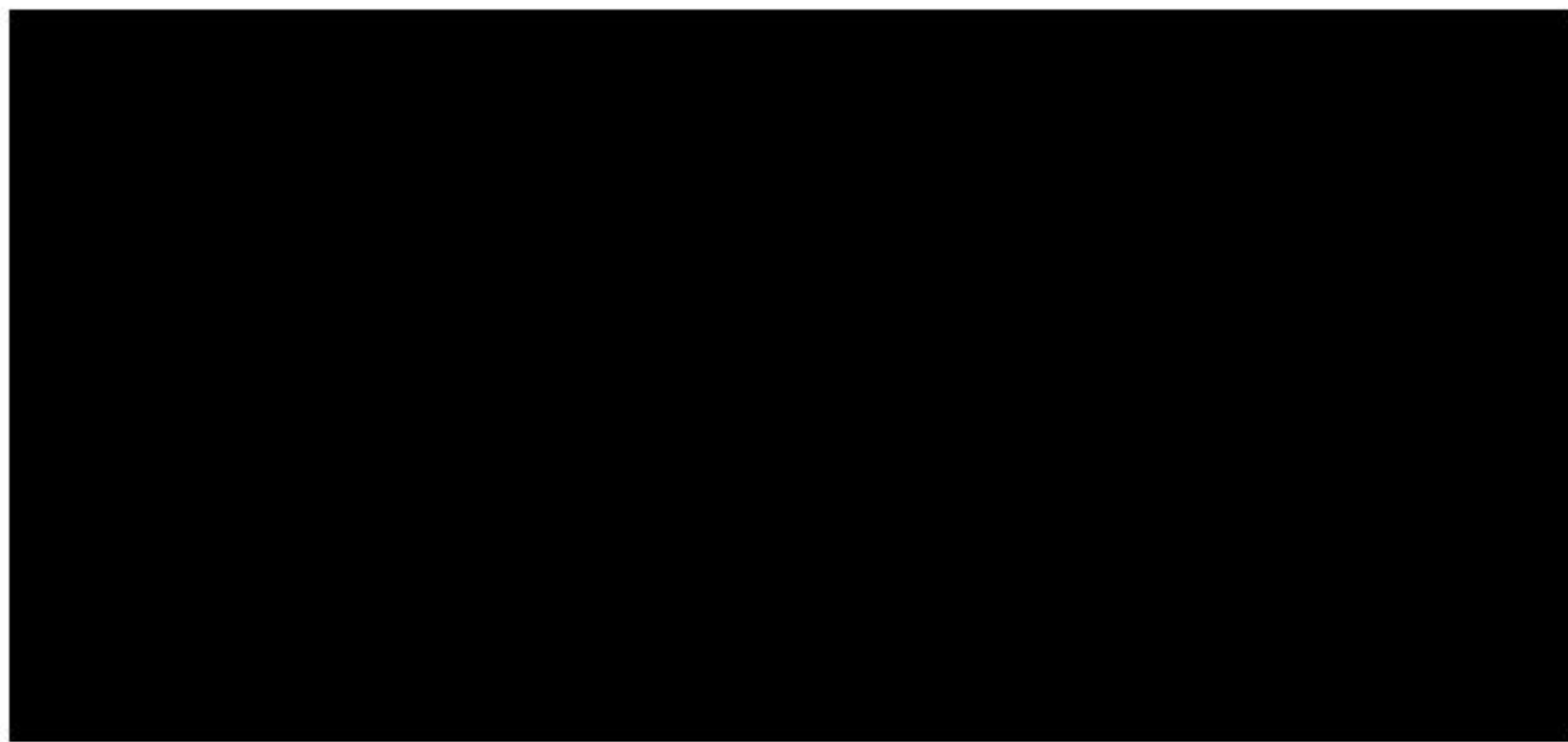


Sarah Valentine

From: [REDACTED]
Sent: 19 August 2026 23:08
To: planninginfo
Subject: DM/26/0131 - Consolidated supplementary objection to revised reserved-matters plans



19 August 2026

Planning Department
Mid Sussex District Council

By email: planninginfo@midsussex.gov.uk

Dear Planning Officer,

Re: DM/26/0131 - Consolidated supplementary objection to revised reserved-matters plans

Land South and West of Upper Imberhorne School, Imberhorne Lane, East Grinstead

I refer to my objection dated 22 June 2026. I maintain that objection in full and ask that this supplementary representation be placed on the public application file and read alongside it. My original objection was expressly directed to the reserved matters of appearance, landscaping, layout and scale, together with compliance with the outline permission, approved parameter plans, relevant planning conditions, Section 106 obligations, infrastructure phasing and the effects of the detailed proposals on residential amenity and public safety.

I recognise that outline planning permission has been granted under DM/23/2699 and that the principle of up to 550 Class C3 dwellings is not for redetermination through this reserved-matters application. This representation does not seek to reverse the outline permission or reopen any matter conclusively approved at that stage.

It does, however, ask the Council to determine rigorously the matters that remain open and to establish that the final proposals comply with the outline permission, its conditions, the approved parameter plans, the development plan and the obligations and infrastructure assumptions upon which the outline permission depended.

Outline permission is not an entitlement to approval of any detailed layout subsequently submitted. The detailed appearance, landscaping, layout and scale must themselves be acceptable and must

fall within the terms of the outline permission and its conditions. The Supreme Court has confirmed both sides of that legal position: outline permission confers development rights that cannot simply be rewritten through later policy, but applications at later approval stages must be determined within the scope and terms of the relevant conditions.

The continued progression of this application must not result in unresolved matters being treated as inevitable, or in the momentum of a development being substituted for proper planning judgment. The lawful question is whether the final detailed scheme is acceptable on the evidence now before the Council.

1. Statutory and national-policy basis for determination

Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires a planning determination to be made in accordance with the development plan unless material considerations indicate otherwise. Section 70(2) of the Town and Country Planning Act 1990 requires the authority to have regard to the development plan and other material considerations.

A replacement National Planning Policy Framework was published on 17 August 2026. Its national decision-making policies became material considerations immediately upon publication. The Council must therefore assess the detailed matters still open for determination against the current Framework, while respecting the legal scope of the outline permission.

Particularly relevant are:

- **Policy DM3**, concerning proportionate decision-making, representations, information deficiencies, public-safety risks and consultee advice;
- **Policies DP3 and DP4**, concerning context, integrated communities, green infrastructure, movement, built form, public space, identity, design review and accurate final drawings;
- **Policies TR4 and TR6**, concerning street design, suitable parking, service and emergency access, reasonable future transport scenarios, relevant times of day, cumulative congestion and highway safety;
- **Policy P3**, concerning the cumulative effects of noise, artificial light and other pollution on occupiers and neighbouring residents; and
- **Policies HE4 to HE6**, concerning effects on heritage significance and the contribution made by the setting of designated heritage assets.

Policy DM3 does not require a planning authority to determine an application despite missing evidence. It specifically recognises that a decision may need to await consultee advice where there is insufficient information, where proceeding without the advice would present public-safety risks, or where more detailed advice could enable approval rather than refusal.

The matters identified below—including emergency access, bridge-related queueing, cycle-route visibility, final drainage evidence, water and sewerage infrastructure, junction effects on established homes and the cumulative noise and overheating environment—fall within those categories if they have not yet been satisfactorily resolved.

I am not asking for delay for its own sake. I am asking the Council not to make an irreversible decision affecting hundreds of existing and future households without the information necessary to reach a lawful, rational and safe conclusion.

2. Compliance with the outline permission, Condition 19 and the approved plans

As set out in my original objection, Outline Condition 19 requires the reserved matters to be in general conformity with the approved Land Use and Access Parameter Plan, Scale Parameter Plan, Green Infrastructure Parameter Plan and Green Infrastructure Strategy.

Before determination, the Council should publish a single, comprehensible compliance schedule identifying:

- every relevant outline condition;
- every relevant Section 106 obligation and occupation trigger;
- every approved parameter plan, design document and phasing plan;
- the current drawing or document submitted to demonstrate compliance;
- the applicant's position on compliance;
- the Council officer or consultee responsible for checking it;
- whether the requirement has been satisfied, remains outstanding or is disputed; and
- any proposed planning condition or legal mechanism relied upon to resolve it.

The Council should also publish a definitive schedule of:

- all current application drawings;
- all superseded drawings;
- the date and revision number of every drawing;
- the changes made between revisions; and
- the consultees and residents notified of each material revision.

It should not be necessary for residents or members of the Planning Committee to reconstruct the final proposal from multiple document uploads and inconsistent drawing revisions.

Planning Practice Guidance confirms that conditions imposed at reserved-matters stage must directly relate to the reserved matters. I am therefore not asking the Council to invent new obligations outside the application's lawful scope. I am asking it to demonstrate compliance with the obligations, conditions, plans and phasing requirements already applicable to the development and to secure mitigation directly related to the appearance, landscaping, layout and scale now under consideration.

If the proposal materially departs from the approved parameter plans, or if essential mitigation cannot lawfully be secured through conditions relating to the reserved matters or through the existing Section 106 agreement, the correct response is not to approve the scheme in the hope that the problem can be solved later. The application should be refused, deferred for amendment or, where necessary, dealt with through the appropriate application to amend the outline permission.

3. Good planning shapes towns: the lesson from Crawley

Good planning does more than allocate housing numbers. Good planning shapes towns.

Crawley is not advanced as a perfect town or as a development that East Grinstead should copy literally. Nor do 550 dwellings amount to an entire new town. Crawley is, however, a nearby and

relevant illustration of the difference between planned place-making and the piecemeal delivery of housing.

From its designation as a New Town in 1947, Crawley was planned around a ring-and-radial road pattern, residential neighbourhoods grouped around the town centre and a separate employment area to the north. Its neighbourhoods were designed with compact local centres providing everyday facilities such as shops, schools, community buildings and public houses within short walking distances.

Those neighbourhood centres developed into the recognisable local parades and community focal points that serve residents close to their homes. Green spaces, mature landscaping and landscape corridors were integrated into the developed area and helped separate neighbourhoods and give them distinct identities. Historic places such as Ifield and Three Bridges retained recognisable names and identities within the larger town rather than being erased by undifferentiated suburban expansion.

As Crawley matured, it also developed substantial employment areas, a central retail and leisure function and hospital-based urgent and planned treatment services. Manor Royal, Gatwick Airport and Crawley town centre continue to perform significant employment roles.

The relevant lesson is not that every feature of Crawley has worked perfectly, or that all of its more recent development should be regarded as exemplary. It is that the town's original growth was planned around connected neighbourhoods, employment areas, strategic movement routes, green spaces and accessible local facilities.

That should be contrasted with the risk now presented at Imberhorne: a large residential phase on a greenfield site progressing ahead of, and through a separate application process from, the mixed-use area and care village. The available Council evidence records that DM/26/0131 relates only to the 550 Class C3 dwellings and that the mixed-use area and care village are intended to be brought forward separately "in due course".

"In due course" is not an infrastructure delivery strategy.

The comparison with Crawley demonstrates the importance of answering fundamental place-making questions before hundreds of homes are occupied:

- Where will residents obtain everyday goods and services?
- Where are the neighbourhood shops and community facilities?
- Where will healthcare demand be met?
- Where will permanent employment be created?
- How will strategic traffic be distributed without overwhelming established residential roads?
- What spaces will give the new neighbourhood a distinctive identity?
- Which facilities will exist from the beginning rather than being promised after the housing?
- How will the development become part of East Grinstead rather than an isolated estate at its edge?

The purpose is not to require a second Crawley or a self-contained new town. It is to ensure that a development of this scale is planned as an integrated extension of East Grinstead rather than as 550 dwellings placed in a field with insufficient certainty over local facilities, employment, parking and transport.

4. The proposal must deliver the place envisaged by Policy SA20

The adopted Site Allocations Development Plan Document does not describe SA20 merely as a housing estate. It identifies a 64.8-hectare allocation containing 550 dwellings together with a local centre, a care community, early-years and primary-school provision, special educational-needs facilities, strategic SANG, public open space, play provision and land for school playing fields.

Its stated objective is a high-quality and sustainable extension to East Grinstead, based on a landscape-led masterplan, generous green-infrastructure corridors, a strong sense of place, a neighbourhood centre and attractive pedestrian and cycle routes. It directs the development to be sympathetic to the character of East Grinstead and the wider landscape.

SA20 also requires a detailed phasing plan to secure:

- education and special educational-needs provision;
- replacement school playing fields;
- a neighbourhood or local centre;
- strategic SANG and public open space;
- children's play provision;
- the care-community element; and
- measures addressing increased demand for GP services.

The Council must therefore assess the current residential reserved-matters application as part of that policy framework, not as a freestanding housing layout divorced from the wider allocation.

Before determination, the Council should publish a Whole-Site Place and Infrastructure Delivery Schedule setting out for each non-residential or infrastructure component:

- the approved use and anticipated floorspace or land area;
- the planning application or approval through which it will be delivered;
- the delivery organisation;
- its funding mechanism;
- the relevant condition or Section 106 provision;
- its intended commencement and completion dates;
- the maximum number of Class C3 homes that may be occupied before it becomes operational;
- the monitoring and enforcement body; and
- the fallback or remedy if delivery is delayed or does not occur.

This schedule should cover at least:

- the local or neighbourhood centre;
- shops and other everyday services;
- health and GP provision;
- the care-community phase;
- primary, early-years and special educational-needs provision;
- school playing fields and sports facilities;
- public-transport improvements;
- the SANG and public open space;
- pedestrian and cycle connections;
- strategic highway works;

- drainage and sewerage reinforcement; and
- permanent employment-generating uses.

Approval should not be based on benefits or travel assumptions associated with facilities whose delivery is not secured.

5. Employment, commerce and the economic sustainability of the development

I recognise that this reserved-matters application cannot be required to introduce uses that fall outside the scope of the outline permission or the land covered by this residential phase.

However, the Council cannot simultaneously:

1. accept transport assumptions based upon future residents making fewer private-car journeys because local services and facilities will be available;
2. allow the 550-home residential phase to proceed substantially ahead of those facilities; and
3. treat their later delivery as somebody else's problem.

The current application does not itself demonstrate a clear, secured strategy for permanent employment proportionate to the scale of the new population. Construction employment is temporary. It is not a substitute for long-term employment, commerce and services.

A development of this scale need not contain heavy industry, but it should be supported by a credible economic and mixed-use strategy, including appropriate opportunities arising from:

- shops and services within the local centre;
- education;
- healthcare;
- care provision;
- community facilities;
- offices, studios or flexible small-business space where permitted;
- estate management;
- leisure and recreation; and
- other suitable work-generating uses.

The Council should require a statement identifying:

- the permanent full-time-equivalent jobs anticipated from each component of the wider allocation;
- the land use or facility generating those jobs;
- whether that component has planning permission;
- its expected delivery date;
- the legal or financial mechanism securing delivery; and
- the number of homes permitted to be occupied before it is operational.

Where significant permanent employment will not be available within or immediately adjoining the development, the transport assessment must model the resulting outward-commuting pattern. It must not assume a highly sustainable mode share while the local centre, employment-generating uses, healthcare and other essential services remain absent or unsecured.

Good planning should create a balanced extension containing homes, services, community infrastructure, green space, education and realistic access to employment. It should not produce a large car-dependent dormitory development and leave East Grinstead to absorb the resulting congestion and service demands.

6. Density, transition and urban form

This is not an objection to density in principle or to the efficient use of allocated land.

The objection is that the distribution and physical form of the proposed density have not been adequately justified in relation to:

- the established Imberhorne Estate;
- the countryside edge;
- the approved neighbourhood centre;
- public transport and accessibility;
- building height and massing;
- plot width and garden provision;
- parking form;
- landscape capacity; and
- residential amenity.

Policy SA20 specifically directs higher-density development with three- to four-storey frontages towards the most accessible part of the site around the neighbourhood centre. It also requires parking to be accommodated so that it does not dominate the public realm.

The Council should therefore identify clearly:

- the location of the neighbourhood centre;
- the parcels considered to be the most accessible;
- where the three- and four-storey elements are proposed;
- the density of each parcel;
- the distance between each higher-density parcel and the neighbourhood centre;
- the density and building heights at the boundary with the existing estate; and
- whether the distribution accords with the spatial logic of SA20.

The issue is not merely the arithmetic number of dwellings per hectare. Density is experienced through building height, massing, plot widths, gaps, garden depths, road widths, parking arrangements, tree cover, landscape buffers, overlooking, outlook, lighting, noise and the relationship between buildings and public spaces.

Before determination, the applicant should provide:

- net and gross dwellings-per-hectare figures for every parcel;
- a local contextual-density plan comparing adjoining and nearby streets;
- a plan showing the distribution of dwelling types and storey heights;
- plot widths and private-garden dimensions;
- building-to-boundary and window-to-window separation distances;
- existing and proposed levels;
- ridge and eaves heights;
- continuous street elevations;

- cross-sections through the boundary with the existing estate;
- verified street-level visualisations from representative existing roads and homes; and
- a reasoned explanation for the positioning of every flatted or three- and four-storey element.

Policy DP3 requires proposals to respond to their context and integrate with their surroundings. It supports increased scale or density where justified, but it also requires liveable, integrated communities, coherent movement, high-quality public space and distinctive identity. Policy DP4 supports appropriate design review for strategic sites and significant projects.

An independent design review should therefore be undertaken on the final scheme. It should specifically assess the relationship with the existing estate, the distribution of height and density, parking dominance, long views, landscape structure, the neighbourhood centre and the quality of the proposed public realm.

At the interface with existing lower-rise homes, the layout should employ a genuinely graduated transition through lower building forms, meaningful separation, appropriate plot proportions and substantial structural landscaping. Thin planting strips or small trees that may take many years to mature cannot be treated as immediate mitigation for an abrupt and substantially more intensive built form.

7. Housing quality, local identity and long-term stewardship

A development of 550 dwellings is large enough to form a substantial new neighbourhood. It should possess a recognisable identity connected to East Grinstead's history, landscape and settlement pattern.

The applicant should demonstrate how:

- street and place names will relate to the history and landscape of East Grinstead;
- building forms, materials, roofscapes and details respond to local character;
- retained hedgerows, field patterns, water features and landscape elements have informed the layout;
- different parts of the development will be recognisable without relying on excessive signage;
- affordable and market homes will be externally tenure-blind and properly integrated;
- flats and higher-density homes will have adequate amenity, cycle storage and refuse provision;
- parking courts, paths and public spaces will receive natural surveillance;
- public areas will be accessible to people of different ages and mobility levels; and
- design quality will be protected against later substitution or reduction.

Policy DP4 states that the quality of an approved development should not be materially diminished between permission and completion. The final approval should therefore identify enforceable materials, boundary treatments, landscape specifications and key design details rather than leave them open to later dilution.

A long-term stewardship strategy should identify:

- which roads and paths will be adopted;
- who will own and maintain open spaces, play areas, landscape buffers, drainage features and ecological areas;
- the maintenance standard;

- the funding mechanism;
- residents' charges and governance arrangements;
- responsibility for parking enforcement;
- procedures for neglected communal areas;
- inspection and replacement of failed planting; and
- escalation arrangements where management obligations are not fulfilled.

Public spaces and landscape areas relied upon as planning mitigation must be protected and funded for the lifetime of the development, not simply provided during the sales period.

8. Parking, servicing, emergency access and the real operation of estate streets

The revised plans appear to rely extensively on frontage parking, driveways, tandem spaces, garages and parking courts, with limited clearly identified and evenly distributed visitor provision.

With 550 dwellings, a small shortfall repeated across multiple streets could produce substantial cumulative overspill. The existing Imberhorne Estate must not become an informal overflow car park for the new development.

Policy TR4 requires suitable parking and requires layouts to allow efficient deliveries and access by service and emergency vehicles without compromising place-making. It also requires routes to be safe and inclusive, particularly for children, older people, disabled people and those with limited mobility.

Before determination, the applicant should provide a plot-by-plot schedule identifying:

- every allocated resident space;
- every unallocated resident space;
- every visitor space;
- every disabled-user space;
- every car-club space;
- every motorcycle space;
- all secure cycle parking;
- all electric-vehicle charging provision;
- the dimensions of every garage;
- the relationship between each dwelling and its parking; and
- the management status of every communal parking area.

Garages should be counted only where their internal clear dimensions allow a representative modern vehicle to be parked while permitting occupants to open doors, enter and leave the vehicle and retain any essential domestic storage intended to be placed there.

Tandem spaces should not be treated as equivalent to independently accessible spaces without evidence of their likely operational effectiveness. Remote parking-court spaces should not be assumed to be used where easier informal parking would be available closer to dwellings.

The applicant should publish a parking-demand and stress assessment covering:

- weekday evenings;
- weekends;

- school arrival and departure periods;
- deliveries and home-servicing demand;
- refuse-collection periods;
- community or sports events; and
- the period before the local centre and public-transport improvements are operational.

Swept-path assessments for refuse and emergency vehicles should be repeated with representative vehicles parked where informal or overspill parking is realistically likely to occur. The assessment should not assume an artificially clear estate in which every vehicle is perfectly parked and no delivery van, visitor or contractor is present.

The applicant should also explain:

- how parking restrictions will be enforced;
- which organisation will possess enforcement powers;
- how parking courts will be managed;
- how abandoned or inconsiderately parked vehicles will be addressed;
- how footways, corners, visibility splays and fire routes will be protected; and
- what happens if the proposed parking assumptions prove incorrect after occupation.

9. The approved entrance, constrained bridge and final internal layout

I recognise that the principle or location of the vehicular access may have been established at outline stage. I do not ask the Council to relocate an access point that has already been conclusively approved.

The reserved-matters decision must nevertheless establish that the final internal layout, spine road, dwelling arrangement, site levels, landscaping, servicing strategy and emergency-access arrangements are compatible with that approved access.

The proposed principal entrance appears to interact closely with the constrained bridge on Imberhorne Lane. If queueing, slowing or interruption at the junction could affect the bridge, the two elements cannot rationally be assessed as unrelated pieces of infrastructure.

To the extent required by the outline conditions or necessary to understand the operation of the final layout, the applicant should model the bridge, junction and internal spine road as one connected highway system.

The evidence should include:

- surveyed carriageway and bridge widths;
- surveyed visibility;
- existing priority arrangements;
- the final junction geometry;
- representative vehicle tracking;
- current traffic data, or older data transparently validated and factored to the determination year;
- the final dwelling mix and corresponding trip assumptions;
- committed developments and reasonable future scenarios;
- school start and finish periods;

- weekday morning and evening peaks;
- weekends;
- construction peaks;
- buses, HGVs, delivery vehicles, refuse vehicles and emergency vehicles;
- temporary obstruction or breakdown scenarios; and
- periods during which the local centre or sustainable-transport measures are not yet operational.

The results should report mean queues, maximum modelled queues and 95th-percentile queues, or an equivalent robust queue metric. They should show whether queues could extend onto or across the bridge, obstruct adjoining accesses, interfere with emergency movements or create pressure for unsafe reversing or overtaking.

Policy TR6 requires reasonable future scenarios, relevant times of day and cumulative impacts to be considered. It states that development should be refused where it would have a severe adverse effect on network capacity or congestion, including cumulative effects, or an unacceptable impact on highway safety.

The applicant should also provide a documented contingency plan addressing:

- temporary obstruction of the principal entrance;
- temporary obstruction of the bridge;
- a vehicle breakdown;
- a road traffic collision;
- flooding or fallen trees;
- construction incidents; and
- simultaneous attendance by emergency vehicles.

The Council should identify whether residents and emergency services would retain a safe and practical alternative means of access. A nominal emergency route that cannot accommodate the required vehicles or is dependent upon unlockable barriers, unsuitable surfaces or unavailable land would not be adequate.

If the Council considers that these operational matters were fully and conclusively settled at outline stage, the officer report should identify the precise approved documents and conditions relied upon and explain why the final revised layout does not require any updated assessment.

10. Noise, headlamp sweep and permanent lighting affecting existing homes

The houses opposite and close to the proposed entrance could experience a permanent change in their living environment.

The effects are not limited to average traffic-noise levels. Vehicles approaching, braking, waiting, turning and accelerating may create repeated and distinctive noise events. Buses, refuse vehicles, delivery vehicles, motorcycles and construction traffic may be particularly intrusive during early-morning, evening and night-time periods.

Turning vehicles may also cause headlamps to sweep across existing façades, bedroom windows, living rooms and gardens. The effect may be influenced by:

- final road geometry;
- gradients and site levels;
- waiting positions;
- vehicle height;
- modern headlamp intensity;
- wet-road reflections;
- winter conditions;
- the absence of mature foliage; and
- vehicles queueing or turning during darkness.

Policy P3 requires the cumulative effects of noise and artificial light to be considered, including effects on neighbouring residents and potentially vulnerable groups. It requires unacceptable noise and artificial-light effects to be avoided or mitigated to an acceptable degree.

Before determination, the Council should require:

- a junction-specific road-traffic noise assessment addressing both average noise exposure and single-event maximum noise levels;
- assessment of acceleration, braking, idling, engine revving, heavy vehicles, motorcycles and vehicles fitted with modified or unusually loud exhaust systems;
- assessment of intermittent high-noise events associated with rapid, high-speed or anti-social driving, including any locally evidenced incidents of informal street racing;
- assessment of whether the final junction geometry, road alignment, gradients, visibility and length of unobstructed carriageway could encourage rapid acceleration or other anti-social driving behaviour;
- consideration of whether enforceable highway-design, traffic-calming or management measures are required to discourage excessive speed, repeated acceleration and engine revving;
- consideration of early-morning, evening and night-time conditions, when individual vehicle events are likely to be more intrusive because background noise levels are lower;
- a headlamp-sweep assessment based on the final road geometry, levels, turning paths and representative vehicle heights;
- representative worst-case night-time viewpoints from affected ground-floor and first-floor windows and gardens;
- assessment of vehicles waiting and queueing as well as moving;
- full details of street lights, illuminated signs and crossing equipment;
- horizontal and vertical illuminance calculations;
- isolux contours showing predicted light spill onto existing properties;
- glare assessment;
- consideration of wet-weather reflections and winter conditions; and
- enforceable acoustic, lighting, landscape, highway-design and traffic-management mitigation.

The assessment should not rely solely upon annualised or average road-traffic noise indicators, which may conceal the effect of individual intrusive events. It should consider the frequency, duration and maximum noise level of vehicles accelerating away from the junction, motorcycles, modified exhaust systems, heavy vehicles and foreseeable incidents of rapid or anti-social driving.

Where there is local evidence of repeated high-speed driving, engine revving or informal street racing, that evidence should be provided to the applicant's acoustic and highway consultants and addressed expressly in the assessment. The Council should also consider whether the proposed

road geometry would create a long, open or lightly constrained section of carriageway capable of attracting such behaviour.

The purpose of this request is not to suggest that unlawful driving can be predicted with precision. It is to ensure that the final layout does not create or intensify conditions conducive to foreseeable anti-social driving and that the effects of realistic maximum-noise events on established homes are not concealed by reliance on average traffic-noise calculations.

Moving vehicle headlamps and fixed street lighting are different sources and should not be conflated. Isolux plans are appropriate for permanent lighting, while headlamp sweep should be assessed using the final geometry and representative vehicle movements.

Thin planting or young trees should not be relied upon as the sole immediate mitigation. If unacceptable effects would arise, the relevant reserved-matters elements; including levels, alignment, landscape treatment, boundary design and dwelling orientation should be amended before approval.

11. Walking and cycling routes through existing residential areas

The development will generate substantial pedestrian and cycle movement towards schools, the town centre, public transport and other facilities.

Active travel should be encouraged, but routes must be safe, convenient, inclusive and compatible with the residential amenity of existing communities. Existing quiet streets should not be treated merely as lines on a connectivity plan.

The applicant should provide a route-assignment assessment showing:

- the estimated daily number of walking and cycling trips;
- the origin and destination of those trips;
- the number expected to use each site connection;
- the number expected to use each existing residential road;
- school-peak movements;
- evening and weekend movements; and
- the assumed distribution between alternative routes.

A full-route safety and amenity audit should assess the complete journey between the site and relevant destinations, rather than ending at the application boundary. It should consider:

- footway and cycleway widths;
- gradients;
- crossing points;
- visibility;
- lighting and glare;
- conflict between pedestrians, cyclists and vehicles;
- accessibility for older and disabled people;
- privacy and overlooking of existing homes;
- school safeguarding;
- natural surveillance;
- anti-social behaviour risk;

- maintenance;
- drainage and winter conditions; and
- boundary treatment.

Sussex Police Designing Out Crime should be asked to review the final routes, parking courts, public spaces and lighting proposals.

12. Cycle connection towards Felbridge

There is a specific concern about the point at which the proposed route connects with the existing route towards Felbridge.

The connection appears to involve a downhill approach and a turn or bend where forward visibility may be restricted. A plan view does not establish that this will be safe for children, less experienced cyclists, mobility-cycle users or people travelling during darkness and wet weather.

Before approval, the Council should require:

- the precise connection point and land ownership to be identified;
- an accurate topographical survey;
- measured visibility based on observed vehicle and cycle speeds;
- longitudinal sections and gradients;
- assessment of stopping and turning movements;
- an independent Stage 2 Road Safety Audit;
- the designer's response to every audit recommendation;
- assessment during school peaks, darkness and wet weather;
- details of crossing priority, signs, markings and lighting; and
- confirmation of the authority responsible for future inspection and maintenance.

A theoretical line on a plan is not a safe or usable transport route. If adequate visibility and a safe transition cannot be achieved, the connection should be redesigned.

13. Water supply, foul sewerage and surface-water drainage

Water supply, foul sewerage and surface-water drainage are separate technical systems and should be evidenced separately.

A general statement that a water company or statutory undertaker has “no objection” does not demonstrate, by itself, that:

- local water pressure will remain adequate;
- the distribution network is sufficiently resilient;
- foul sewers possess adequate hydraulic capacity;
- treatment capacity is available;
- required reinforcement will be completed in time; or
- the final surface-water strategy is compatible with the revised layout.

On 19 August 2026, I understand that a water leak resulted in a road closure at or close to the Park Road and Heathcote Drive junction. This is one of a number of local water-main incidents experienced or reported by residents.

A local main failure does not, by itself, prove that the network lacks development capacity. It does, however, raise a legitimate question about the condition and resilience of the local distribution network and about whether a generic strategic-capacity response adequately addresses local conditions.

The applicant and relevant undertaker should therefore distinguish clearly between:

1. strategic treatment and supply capacity;
2. local distribution-network capacity and pressure;
3. local-main condition and resilience;
4. foul-sewer hydraulic capacity;
5. wastewater-treatment capacity; and
6. surface-water drainage and flood risk.

Before determination, the Council should publish or clearly identify:

- the potable-water capacity and pressure assessment;
- the foul-sewer hydraulic assessment;
- proposed connection points;
- existing-main condition information where available;
- required reinforcement;
- the organisation responsible for each improvement;
- funding and delivery arrangements;
- completion dates;
- occupation triggers;
- contingency arrangements if works are delayed;
- confirmation of how existing customers will be protected from deterioration in service;
- final levels and finished-floor levels;
- groundwater and infiltration evidence;
- SuDS basin, swale and exceedance-route details;
- climate-change allowances;
- outfall arrangements; and
- adoption, inspection and lifetime maintenance responsibilities.

Policy SA20 expressly states that occupation is to be phased to align with delivery of sewerage infrastructure in liaison with the service provider. That requirement should be translated into a clear and enforceable occupation schedule.

No dwelling should be occupied before the water or sewerage reinforcement required to serve it is complete and operational.

The Lead Local Flood Authority should provide a final response based on the final revised layout, levels, drainage features and exceedance routing. The Council should not rely upon a response to a superseded layout where roads, plots, levels or drainage areas have subsequently changed.

14. Aircraft noise and the cumulative living environment

My objection dated 22 June 2026 set out detailed concerns regarding Condition 23, Gatwick aircraft noise, single-event maximum noise levels, ventilation and overheating. Those concerns are maintained.

Condition 23 requires acoustics, ventilation and overheating to be considered together and requires

good acoustic design to be integrated into the scheme through separation, layout, orientation, façade design and screening.

Policy P3 of the current NPPF reinforces the requirement to assess cumulative effects and pre-existing conditions in the vicinity of a development.

The assessment should therefore address the combined environment created by:

- aircraft overflights;
- traffic on Imberhorne Lane;
- vehicles braking and accelerating at the entrance;
- bridge-related queueing;
- construction traffic;
- internal estate traffic;
- parking-court activity;
- school and sports activity;
- play areas;
- public open space;
- servicing and refuse collection; and
- pedestrian and cycle routes.

The assessment should be plot-specific and should cover:

- bedrooms and living rooms;
- gardens;
- balconies;
- play areas;
- public open spaces;
- day, evening and night conditions;
- single-event maximum aircraft-noise levels;
- seasonal runway and wind changes;
- open-window conditions;
- alternative ventilation;
- summer overheating; and
- the cumulative frequency of intrusive events.

A compact layout provides fewer opportunities to separate sensitive rooms and amenity spaces from noise sources. The detailed layout should therefore apply good acoustic design before relying on enhanced glazing, closed windows or mechanical systems.

The Council should not approve homes that depend on residents keeping windows closed to obtain acceptable acoustic conditions unless the applicant has demonstrated, plot by plot, that adequate ventilation and acceptable summer temperatures can be maintained without creating excessive internal noise, oppressive conditions or routine reliance on active cooling.

The assessment should also ensure that introducing new residential development into an established aircraft-noise environment does not create avoidable pressure for restrictions on Gatwick's lawful operation.

15. School playing fields, education and construction phasing

The existing Imberhorne Upper School playing fields and the operation of the school must be protected during construction.

My original objection requested that no works, fencing, construction access, haul route, compound, drainage work or other activity affecting the existing playing fields should occur before replacement facilities are complete, fit for purpose and available for school use. It also identified the concern that an occupation threshold alone may not prevent disruption to current pupils before that threshold is reached.

The Council should identify:

- the approved playing-field phasing arrangements;
- the precise land affected;
- the lawful trigger for transfer or disturbance;
- when replacement facilities will be completed;
- who will certify them;
- whether Sport England, West Sussex County Council and the school have agreed the final arrangements;
- whether any construction access or haul route affects school land; and
- what enforcement mechanism protects existing school use.

The final housing mix should also be assessed by West Sussex County Council Education so that the child yield and resulting demand for early-years, primary, special educational-needs, secondary and sixth-form places are understood before occupation triggers are confirmed.

The Construction Management Plan should be specific and enforceable. It should include:

- approved HGV routes;
- restrictions during school start and finish periods;
- delivery booking arrangements;
- contractor parking;
- wheel washing and mud controls;
- dust, noise and vibration limits;
- construction lighting;
- drainage and pollution controls;
- monitoring;
- a named contact available to residents and the school;
- escalation procedures;
- breach consequences; and
- reporting to the Council.

Construction traffic should not be routed through existing residential roads or permitted to obstruct school access, the Worth Way, public rights of way, pedestrian and cycle routes or the constrained bridge.

16. Heritage, landscape and ecology

The statutory public notice identifies DM/26/0131 as affecting the setting of a listed building. Policy SA20 also identifies the need to protect the rural setting of nearby listed buildings through masterplanning, layout, design and landscape structure.

The current NPPF requires assessment of the significance of affected heritage assets, including the contribution made by their setting, and requires decision-makers to be satisfied that the assessment accurately reflects the development's effects. Harm to a designated heritage asset requires clear and convincing justification and must be given considerable importance and weight.

Before determination, the Conservation Officer should assess the final:

- building heights;
- roofscape;
- materials;
- levels;
- street lighting;
- landscape structure;
- boundary treatments;
- verified views; and
- cumulative visual effect.

The assessment should identify the degree of any harm rather than merely stating that the proposal is acceptable.

The final layout should also demonstrate that:

- retained hedgerows and historic field boundaries are genuinely incorporated;
- ecological corridors remain continuous;
- roads and parking do not sever habitat links;
- SuDS contributes to biodiversity and water quality;
- bat-sensitive routes are protected from inappropriate lighting;
- farmland-bird mitigation is secured;
- structural landscaping has adequate width and soil volume;
- replacement planting is enforceable; and
- long-term ecological and landscape management is funded.

Policy SA20 requires a landscape-led development, substantial enhancement of the existing landscape structure, protection of the Worth Way and integration of SuDS, ecological corridors and safe walking and cycling routes.

These are not optional decorative additions. They are part of the policy basis on which development of this greenfield site was accepted.

17. Fair consultation and transparent decision-making

Where an application has been amended, Planning Practice Guidance states that the local planning authority must decide whether further publicity or consultation is necessary in the interests of fairness. The relevant consideration is whether, without reconsultation, those entitled to be consulted would be deprived of a fair opportunity to make representations on the amended proposal.

I therefore ask the Council to:

- publish the definitive final drawing pack;
- publish a clear schedule of changes;
- identify which documents have been superseded;

- allow proportionate further consultation where material revisions affect matters previously open to comment;
- obtain final consultee responses on the same final plans;
- avoid determining the application while material documents are still changing; and
- explain in the officer report the reasons for any decision not to reconsult.

A collection of consultee statements saying “no objection” should not be treated as a substitute for transparent reasoning. The officer report should explain the evidence relied upon and how the principal concerns raised by residents have been addressed.

Given the scale and sensitivity of the proposal, the application should be determined by the Planning Committee following a site visit. Members should be able to inspect:

- the relationship with the existing estate;
- the bridge and proposed entrance;
- the homes facing the entrance;
- the school and playing fields;
- the proposed walking and cycling connections;
- the Felbridge route;
- the Worth Way corridor;
- local drainage features; and
- the setting of nearby heritage assets.

18. Requested action

For the reasons above, together with all the grounds contained in my objection dated 22 June 2026, I ask the Council to refuse DM/26/0131 if it concludes that the final reserved-matters proposals conflict materially with:

- the outline permission or approved parameter plans;
- Policy SA20;
- relevant development-plan design and amenity policies;
- the current national decision-making policies;
- highway or public-safety requirements;
- drainage or sewerage requirements;
- heritage duties; or
- the living conditions of existing or future residents.

Where the deficiencies are capable of remedy, the legally appropriate alternative is to defer determination until the evidence has been provided and tested. That would be a proportionate application of Policy DM3, not delay for its own sake.

At minimum, the following should be provided, published and assessed before determination:

- a condition-by-condition and Section 106 compliance schedule;
- a parameter-plan compliance matrix;
- a definitive current and superseded drawing schedule;
- proportionate reconsultation on material revisions;
- a parcel-by-parcel density and height schedule;
- contextual plans, sections, street scenes and verified views;
- an independent design review;

- a Whole-Site Place and Infrastructure Delivery Schedule;
- binding occupation triggers for the local centre and supporting infrastructure;
- a permanent-employment and economic-delivery statement;
- a complete resident, visitor, disabled and cycle-parking schedule;
- realistic parking-stress evidence;
- refuse and emergency swept paths under realistic parking conditions;
- a connected operational assessment of the bridge, junction and internal spine road;
- queue-length and obstruction modelling;
- an entrance and bridge emergency-contingency plan;
- a junction-specific noise assessment;
- a headlamp-sweep assessment;
- full permanent-lighting calculations and isolux plans;
- a route-assignment and residential-amenity assessment for walking and cycling;
- topographical and visibility evidence for the Felbridge cycle connection;
- an independent Stage 2 Road Safety Audit and designer's response;
- final water-supply, pressure and network-resilience evidence;
- final foul-sewer hydraulic-capacity and reinforcement evidence;
- final LLFA comments on the revised layout and drainage scheme;
- enforceable occupation phasing aligned with sewerage infrastructure;
- a plot-by-plot cumulative acoustics, ventilation and overheating assessment;
- final education and school-playing-field phasing responses;
- Sussex Police Designing Out Crime comments;
- Conservation Officer comments on the final scheme;
- final ecological, landscape and lighting evidence;
- a funded long-term stewardship strategy; and
- a robust and enforceable Construction Management Plan.

The Council is being asked to approve the permanent detailed form of a major urban extension. It should not do so on the basis of assumptions, later promises or facilities to be pursued through unidentified future applications.

Good planning shapes towns. It connects homes to employment, shops, healthcare, education, recreation, transport and green space. It gives neighbourhoods identity and ensures that strategic movement and infrastructure are planned rather than displaced onto existing residents.

The question is therefore not simply whether 550 dwellings can physically be fitted onto the site. It is whether the detailed proposal will create a coherent, safe, sustainable and well-integrated extension to East Grinstead and whether the people who already live here will be properly protected throughout its construction and operation.

On the evidence presently available, those conclusions have not been demonstrated with sufficient certainty. The application should therefore be refused or deferred until the identified matters have been properly resolved.

Please confirm that this supplementary objection has been placed on the public application file, will be read with my objection dated 22 June 2026 and will be included in the material placed before the Planning Committee.

Yours faithfully,

