

**KILN WOOD**  
**Turners Hill Road**  
**Crawley Down**  
**West Sussex**  
**RH10 4HB**

Mr Steve King  
MSDC  
Oaklands Road  
Haywards Heath  
West Sussex RH16 1SS

22<sup>nd</sup> May 2025

Dear Mr King

**Planning Applications DM/25/0014, DM/25/0015, DM/25/0016 and DM/25/0017**

I am writing as a long term resident of Crawley Down to strongly object to these applications. The applications are contrary to policies DP6, DP12, DP13, DP20, DP25, DP26, DP29, DP30, DP37, DP38, and DP41<sup>i</sup> of the Mid Sussex District Plan 2014-2031 and policies CDNP01, CDNP05, CDNP06, CDNP07, CDNP08, CDNP09<sup>ii</sup> of the Crawley Down Neighbourhood Plan 2014-2031.

The adverse impacts of the proposed developments significantly and demonstrably outweigh the benefits when assessed against the policies in the National Planning Policy Framework (NPPF) taken as a whole, and all the applications should be refused.

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i

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|-------|-------------------------------------------------|
| DP6   | Settlement Hierarchy                            |
| DP12  | Protection and Enhancement of (the) Countryside |
| DP13  | Preventing Coalescence                          |
| DP20  | Securing Infrastructure                         |
| DP13  | Preventing Coalescence                          |
| DP20  | Securing Infrastructure                         |
| DP25  | Community Facilities and Local Services         |
| DP26  | Character and Design                            |
| DP29  | Noise, Air and Light Pollution                  |
| DP 30 | Housing Mix                                     |
| DP37  | Trees, Woodland and Hedgerows                   |
| DP38  | Biodiversity                                    |
| DP41  | Flood Risk and Drainage                         |

ii

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|--------|----------------------------------------------------------------------------|
| CDNP01 | Securing Sustainable Local Infrastructure                                  |
| CDNP05 | Control of New Developments                                                |
| CDNP06 | Sustainable Drainage Systems                                               |
| CDNP07 | Retention of Existing Employment Sites and the use of Vernacular Buildings |
| CDNP08 | Prevention of Coalescence                                                  |
| CDNP09 | Protect and Enhance Biodiversity                                           |

## **General Comments on all applications**

These applications are the culmination of 50 years of ambition by the landowner for the development of Huntsland Farm as a housing estate. There have been numerous previous applications, including one for 165 homes in 1976. They have all been refused by on the grounds that they were contrary to the Local Plan in its various forms. In the 1970s, the forerunner of this Council actually paid the landowner not to build houses and since then the farm has been the recipient of many EU and Government grants to encourage its use for agriculture. The latest tenant, a local young farmer, was farming the land for arable and livestock as recently as last year.

The gap between East Grinstead and Crawley was designated as a 'Countryside Area of Development Restraint until the introduction of the NPPF in 2012. Through a series of large-scale developments, fifteen hundred new homes have been built in the gap since then, with existing permissions for another thousand. The infrastructure required to support this growth has not been provided. There have been no new roads, no new schools, capacity issues in all the utilities, the primary health care provider is in special measures, and surface water flooding of both new and established properties.

**Further large-scale development in the gap between East Grinstead and Crawley is contrary to policies DP6 and DP13 of the Mid Sussex District Plan 2014-2031 and CDNP08 <sup>iii</sup> of the Crawley Down Neighbourhood Plan 2014-2031.**

**The applicant's decision to split the development into a number of applications is also a material planning consideration as it disguises the overall adverse impacts of the developments on roads, school places and services and affects the value and phasing of the developer's S106 contributions, making it impossible to effectively plan the use of the contributions to achieve best benefit.**

**The adverse impacts of the additional infrastructure pressures on local roads, schools, healthcare and utilities that these developments will create are a material planning consideration and significantly outweigh the benefits of the jobs created during construction, the 'affordable' homes to address housing need and the developer's contributions to services and community infrastructure.**

The duplication of some applications has been a source of considerable confusion in the local community and has prejudiced the quality of many objections. Alongside this, the under-prepared and incomplete nature of the applications submitted at the start of January has become apparent through the number of additional reports and revisions; the latter including an extraordinary range of alternative locations for the Care Home in the proposed northern land parcel which serves to highlight that the layouts are outline and unlikely to bear any resemblance to the layouts proposed in the detailed matters applications. The applicant's intentions to sell on any permissions granted is evidenced by the applicants reply to your query on water supply and sewerage capacity. The same applicant promoted the Wychwood Phase 2 development, eventually selling the permission to a builder who made significant revisions to the layout at the detailed matters stage to reduce costs, resulting in adverse impacts on the surface water drainage.

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<sup>iii</sup> Part c. specifically protects the gap which these applications will erode.

Further evidence of the adverse impact of the multi-application format is provided by the loss of the ‘community building’ which was highlighted as a major benefit in the publicity material circulated to local residents in the pre-application consultation in late 2024. A recent survey of childcare needs in Crawley Down has highlighted the lack of pre-school and after-hours childcare which a new community building could have addressed. It is probable that the community building was removed because it was only financially viable as part of a 350 home development. The splitting of the development into two halves, has meant that neither can support the cost of the community building alone.

**A development of this overall scale should provide an onsite community building and the failure to do is contrary to policies DP20 and DP25 Mid Sussex District Plan 2014-2031 and CDNP01 of the Crawley Down Neighbourhood Plan 2014-2031. If the Council is minded to grant permission for any of the applications, it should include a condition for the provision of an onsite community building.**

The current Mid Sussex District Plan 2014-2031 was approved in 2018 and a supplementary development plan document allocating a number of additional sites across the district was approved in 2022. The sites promoted by these applications were not included in those allocations and the applications are contrary to policies DP6, DP12, DP13, DP20, DP25, DP26, DP29, DP30, DP37, DP38, and DP41 of the current Mid Sussex District Plan 2014-2031. Huntsland Farm is recommended for allocation in the draft District Plan 2021-2039 as a single site including the farm building themselves, but a Planning Inspector has recently stated that the draft plan can be given only very limited weight at this point of its progress through inspection.

**The conflict with the policies of the current Mid Sussex District Plan 2014-2031 is a material planning consideration which should be given considerable weight despite the Council’s current inability to demonstrate a 5 Year Housing Land Supply. The Council’s excellent 3 year housing delivery performance of over 140% is also a material planning consideration that supports refusal of any application that conflicts with the current Mid Sussex District Plan 2014-2031.**

The Crawley Down Neighbourhood Plan was made in January 2016 and the evidence base was reviewed through a housing needs survey in 2019. The Plan policies must be given weight in the planning balance as they do not include any site allocations. The applications are contrary to policies CDNP01, CDNP05, CDNP06, CDNP07, CDNP08, CDNP09 of the Crawley Down Neighbourhood Plan 2014 – 2031.

**The exclusion of the farm buildings in the centre of the site from the proposed development is a material planning consideration whose adverse environmental and social impacts are contrary to Policy DP26 of the Mid Sussex District Plan 2014-2031 and should be given considerable weight.**

These buildings have had a chequered history in recent years, including being subject to vandalism and rough sleeping. There had been fires in the agricultural equipment stored in the barn alongside the footpath and its asbestos roof has been damaged and could be releasing asbestos fibres or dust.

It is local knowledge there is extensive Japanese knotweed around the derelict farm buildings in the southern land parcel. The landowner attempted to clear the knotweed prior to submitting an application for 6 properties in 2012 (Application 12/03871/OUT). This

resulted in the knotweed being spread to other areas of the farm, including the land that was subsequently used for the Wychwood Phase 2 development promoted by the same applicant. The infestation created by the dumping of spoil from the farm buildings in the woodland which is now part of the Wychwood Phase 2 development is currently unmonitored, is inadequately fenced, and lacks the relevant bio-hazard warning signs. The spreading of the infestation was an illegal act which was reported to the Police, the Environment Agency and MSDC, all of whom took no action. The infestations will be spread further by the increased activity which will result from the developments if they are not removed. Similarly, the farm buildings should be repaired if the current commercial use is to continue.

The SHELAA analysis for the draft District Plan 2021-2039 included the derelict farm buildings when assessing whether the site was sustainable development. Given that the farm buildings are not included in these applications, the SHELAA assessment needs to be revisited, taking account of the adverse environmental impacts of the presence of Japanese knotweed and the adverse social and environmental impacts of the derelict and partial burnt-out asbestos containing buildings which regularly attract rough sleepers and encourage vandalism.

**No development should be allowed without the removal or repair/replacement of the farm buildings, the Japanese knotweed infestations and appropriate landscaping. If the Council is minded to grant permission for any of the applications, it should include a condition requiring the removal or repair/replacement of the farm buildings and the removal of the Japanese Knotweed infestations on the site and on the Wychwood Phase 2 development.**

### **Comments on Access**

**The access proposals for both land parcels are contrary to Policy CDNP05<sup>iv</sup> of the Crawley Down Neighbourhood Plan 2014-2031 and the applications should be refused on these grounds alone.**

### **Applications DM/25/0016 and DM/25/0017**

The access for the proposed northern land parcel is an example of the failure to adopt a strategic approach to development. The reliance on developer-led site selection has led to a piecemeal approach that results in a proposal that would place an unacceptably high capacity on the existing single exit out of Wychwood between the signalised pedestrian crossing and the bus stop. The number of properties served by that exit has grown from the original 26 of the Wychwood Phase 1 development to 70 with the addition of Wychwood Phase 2 and is now proposed to rise to 220 plus the care home traffic which will be significant.

When it was originally proposed to support the Wychwood Phase 1 development, the position of the access onto the Turners Hill Road was the subject of considerable debate given the existing safety issues of the Sandy Lane exit opposite the development, the need for a separate emergency access, the need for a pedestrian crossing point and the location of the bus stop. Even the Secretary of State recognised the unsatisfactory nature of the solution when he made the crossing being updated to a signalised crossing a condition of his approval of Wychwood Phase 2. The route to the school, health centre, shops and the restaurants on Sandy Lane that the signalised crossing serves, requires pedestrians to negotiate the

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<sup>iv</sup> Specifically part h.

dangerous crossing at the top of Sandy Lane to use the pavement on the Southern side. Unsurprisingly, this means that present Wychwood residents prefer to drive out of the development, and the new residents of the 150 homes even further away from the village services will have even more reason to do so.

An access for 220 properties and a care home on the western side of the Turners Hill Road would be best served by the creation of a roundabout or signalised junction at the end of Sandy Lane, a proposal that was rejected when the access was only for 26 properties.

**The increase in traffic using the current Wychwood access is a material planning consideration and will have significant adverse impacts on the residents of the Wychwood Phase 1 properties (contrary to policy DP26 of the Mid Sussex District Plan 2014-2031 and Policy CDNP05 of the Crawley Down Neighbourhood Plan 2014-2031), on traffic flow on the Turners Hill Road and on the bus passengers using the bus stops adjacent to the access and opposite.**

Although the Highways Authority see nothing wrong with the number of properties served by the existing Wychwood access rising to 220 plus a care home, a better solution, would be for the proposed northern land parcel traffic to exit through the adjacent Hurst Farm site. Local Councillors and the Parish Council have been promoting this solution to both the developer and the District Council without success.

**If the Council is minded to grant permission for either of the applications, it should include a condition that the vehicle access for the northern land parcel should be through the Hurst Farm access, even though the Hurst Farm site is not within the application boundary or the Applicant's current control.**

This approach replicates that of the Secretary of State when he made the provision of the two signalised crossings on the Turners Hill Road a condition of the permission for the Wychwood Phase 2 development. The implementation of the crossings is clear evidence that a 'Grampian condition' is feasible and acceptable to a developer.

A final point on the proposed access into the proposed northern land parcel relates to the proposed link road that will join onto the existing Wychwood Phase 2 internal road. From the drawings submitted, the proposed link road will be built on the approximately two thousand cubic metres of 'unused top soil' that the Wychwood Phase 2 developer dumped and levelled off in the southwest corner of the site, alongside the Kiln Wood ancient woodland, raising the ground level there by some 2m and causing significant increased environmental damage to the ancient woodland from increased surface water flooding. It is highly likely that the proposed link road will be subject to subsidence given the unstable nature of the land bank created by the dumping of the 'unused top soil'.

**If the Council is minded to grant permission for either of the applications, it should include a condition requiring the removal of the two thousand cubic metres of 'unused top soil'.** This might also help the drainage from both the northern land parcel and the Wychwood Phase 2 development.

## Applications DM/25/0014 and DM/25/0015

### Proposed Access South of Huntsland Lodge

The proposed new access to the proposed southern land parcel just south of Huntsland Lodge has only been made possible by the felling of a mature oak on 19<sup>th</sup> April 2022 (during the nesting season) just days after the Council rejected my request for a TPO and the then Divisional Leader for Planning and Economy informing me by email on 9<sup>th</sup> April 2022 that the tree was not under threat, an assurance repeated on the 12<sup>th</sup> April 2022 by the then Business Unit Leader for Planning Policy who said *“I would not agree that the threat was immediate. To my knowledge, the site promoters are not proposing removal of trees to gain access”*. I realise that the underhand felling of this single oak is unlikely to generate the same public reaction as the felling of the Sycamore Gap tree, but it is equivalent in terms of being environmental vandalism if not criminal damage and highlights the despicable attitude of the site promoters towards nature. What confidence can anyone have that biodiversity will be respected across the other 100 acres of these land parcels? [REDACTED]

**The felling of the mature oak to create the access south of Huntsland Lodge is a material planning consideration that should be significant weight as an adverse environmental impact of the proposed development and contrary to policies DP12, DP37 and DP38 of the Mid Sussex District Plan 2014-2031 and CDNP09 of the Crawley Down Neighbourhood Plan 2014-2031.**

The safety of the pedestrian access co-located with the new vehicle access should also be reviewed. There is no crossing point at the access and no pavement to the signalised pedestrian cross that serves Huntsland Drive (which would not in any case be the 20 minute neighbourhood route for anyone walking to the Church, allotments or village shops).

Given the geography of the site and the extent of the development, vehicles travelling to the properties in the proposed southern land parcel could enter and exit the development through the proposed new access opposite Vicarage Lane eliminating the need for the proposed vehicle access south of Huntsland Lodge. This would enable the applicant to mitigate the environmental damage due to the destroyed mature tree by a suitable replacement in the same position.

Retaining the access rewards the environmental vandalism of the felling of the mature oak in April 2022 and sends a message that the Council does not respect biodiversity.

### Proposed Access opposite Vicarage Road

The layout of the proposed new access for the proposed southern land parcel opposite Vicarage Road needs to be reconsidered. We commented on an access opposite Vicarage Road when we wrote to the Council on 1<sup>st</sup> January 2013 to make comments on Outline Planning Application DM/12/03871/OUT Land South of Huntsland Barn (6 properties). We proposed; *“a new access road running East to join the Turners Hill Road should be constructed. If this new junction was opposite Vicarage Road it could be constructed as a roundabout which would have the additional benefits of providing a straighter entry to the railway bridge (the scene of many accidents) and slowing traffic on the Turners Hill Road”*.

These comments are still relevant today. Noting that the vehicle traffic emerging onto the Turners Hill Road from the development might impact adversely on traffic leaving Crawley Down village at the Grange Road junction, a double mini-roundabout solution (with mini-roundabouts at Vicarage Road and Grange Road) should be considered.

## **Comments on Drainage**

### **Applications DM/25/0016 and DM/25/0017 (the Northern Land Parcel)**

Huntsland Farm is the head waters of the Mole which flows west towards Gatwick, and the Medway, which flows east. The farmland is impermeable clay and slow draining. Large areas are naturally boggy during winter and spring, even before the impact of significant areas of hard standing are considered.

The applicant has not provided a full contours map for the proposed northern land parcel and as a result has failed to understand that the land parcel has a crown, not a ridgeline. This can be seen clearly in a contours map with 1m intervals and the applicant should be requested to provide such a map for the farm and the land to the Turners Hill Road. The crown is immediately due west of my property. The land is clay and the surface water which radiates off the crown is significant. Prior to the construction of the Wychwood Phase 2 development, there was a distinct surface water flow from the northwest corner of Kiln Wood into the southeast corner of Pescotts Wood (confirmed by a drone photograph taken in 2016). The combination of the construction of the Wychwood Phase 2 houses and the bund created by the two thousand cubic metres of ‘unused topsoil’ dumped along the northeast corner of Kiln Wood has been to interrupt this surface water flow creating ponds in the ancient woodland buffer zone alongside the northern boundary of Kiln Wood as well as flooding the gardens of some houses.

The drainage design for the Wychwood Phase 2 development has a number of SUDs basins in the northeast corner, but these are invariably dry in even heavy rain. It is clear that the drainage design has failed with the new houses and the internal road trapping surface water in the Kiln Wood ancient woodland buffer zone.

**The failure of the proposed drainage plan to correctly take account of the local geography is a material planning consideration that should be given significant weight as an adverse environmental impact of the proposed development and contrary to policies DP41 of the Mid Sussex District Plan 2014-2031 and CHNP06 of the Crawley Down Neighbourhood Plan 2014-2031.**

## **Other Planning Balance Considerations**

### **Economic**

The economic benefits are limited to the transient jobs created during construction. Against this must be set the long-term jobs lost from the closure of the farm which was tenanted until 2024. There may also be economic loss from the closure of the farm buildings if alternative storage cannot be found. Only very limited weight should be given to the economic benefits.

**The loss of these local jobs is contrary to Policy CDNP07 of the Crawley Down Neighbourhood Plan 2014-2031.**

## **Social**

The closure of the New Homes Bonus in 2024 without replacement and the removal of the community building from the plans means that the social benefits are reduced to the affordable homes the development will create.

**S106 contributions can only be used to mitigate the impact of the development and therefore cannot be given weight as a benefit of the development.**

The development would provide 150 affordable homes, in a mix of First Homes, homes for Shared Ownership, and homes for affordable rent. The Crawley Down Neighbourhood Plan has established that the local need is for homes for first time buyers and for downsizing. The homes for affordable rent will not address these aspects of the local need. Prior to the introduction of the NPPF, Crawley Down had 129 homes for affordable rent (about 7.5% of the total housing stock) and 66 households registered on the Mid Sussex Common Housing Register (CHR) with the village as their preference (out of a total of 2,488 households on the CHR). Since 2012 over 130 new affordable homes have been built in the village, including 50 in two rural exception sites. The local demand for affordable homes has been significantly reduced as a result of the increase in the affordable housing stock and when affordable homes become available in the village, they are routinely offered to households whose preference is to live elsewhere in the District where they have family or other support networks. This is likely to be the situation for the new affordable homes created by the proposed development. Although the number of households on the CHR in total has remained at the pre-NPPF level the lack of demand for further affordable housing in Crawley Down means that the 150 affordable homes provided by this development should be given only limited weight.

**The failure to address local housing needs means that the applications are contrary to policies DP30 of the Mid Sussex District Plan 2014-2031 and CDNP05 of the Crawley Down Neighbourhood Plan 2014-2031.**

## **Environmental**

There are no environmental benefits from this development.

**The applications are contrary to policies DP29 of the Mid Sussex District Plan 2014-2031 and CDNP09 of the Crawley Down Neighbourhood Plan 2014-2031.**

**If the Council is minded to grant permission for any of the applications, it should include a condition that the lighting within the development is low level, equivalent to 2,700K and does not face directly into ancient woodland.**

## Summary

The applications are contrary to policies DP6, DP12, DP13, DP20, DP25, DP26, DP29, DP30, DP37, DP38, and DP41 of the Mid Sussex District Plan 2014-2031 and policies CDNP01, CDNP05, CDNP06, CDNP07, CDNP08, CDNP09 of the Crawley Down Neighbourhood Plan 2014-2031.

The adverse impacts of the proposed developments significantly and demonstrably outweigh the benefits when assessed against the policies in the National Planning Policy Framework (NPPF) taken as a whole, and all the applications should be refused.

Yours sincerely

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