



Wivelsfield Parish Council Consultation Response Planning Application at Land East of Lunce Hill, Haywards Heath.

Planning application LW/25/0071 (Lewes District Council)

Planning application DM/25/0827 (Mid Sussex District Council)

May 2025



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1. Introduction

- 1.1. These representations provide a response, prepared by Troy Planning + Design (Chartered Town Planners) on behalf of Wivelsfield Parish Council (WPC), to the following cross-boundary planning applications being considered by Lewes District Council (LDC) and Mid Sussex District Council (MSDC) respectively:
 - **LW/25/0071** Erection of up to 130 dwellings, together with the change of use of an existing barn for a flexible community and/or commercial use, along with associated outdoor space and landscaping, drainage infrastructure, hard and soft landscaping, parking, access and associated works (all matters reserved except for access).
 - **DM/25/0827** Outline planning application for the erection of up to 130 dwellings, together with the change of use of an existing barn for a flexible community and/or commercial use, along with associated outdoor space and landscaping, drainage infrastructure, hard and soft landscaping, parking, access and associated works (all matters reserved except for access).
- 1.2. These applications relate to the land East of Lunce's Hill (also referred to as the land North of Ridge House, Ditchling Road), a site that measures 8.81 hectares, 6.95 of which are located within Lewes District and the remaining 1.86 hectares fall within Mid Sussex District.
- 1.3. The site is bisected by a watercourse (Pellingford Brook) that runs west to east, and is immediately adjacent to Ancient Woodland, sharing with the woodland 300 metres of the site's eastern boundary. The site is undeveloped agricultural land, except for a barn that sits within the western section of the site, adjacent to Lunce's Hill (B2112 Road), which is the only access to the site. Furthermore, Cleavewater is a Grade II Listed Building located less than 20 metres north of the application site (within the MSDC area). The site's boundaries are mainly formed by hedgerows and trees, which also define the edges of historic fields within the site.
- 1.4. WPC has particular interest in ensuring that development within the Parish is planned and results from a plan-led process, in order to achieve the best outcome possible, for the benefit of current and future residents in Wivelsfield and the wider area.
- 1.5. The Parish Council would like to reiterate its support to a plan-led approach and the provision of housing, infrastructure and facilities that meet the needs of the local community. Notwithstanding this, WPC has concerns with the fundamental deviation of the proposal from the Development Plan (in both Lewes and Mid Sussex Districts) and would like to contribute to a positive discussion about the future of the Parish. To achieve this, WPC has produced these representations in which we highlight some of the key policy and local community considerations and concerns that we have with the current proposals. WPC hopes that the scheme is not supported by the Local Planning Authority (LPA). Instead, the site should be

considered – as is happening – within the relevant land availability assessments under both districts' local plan review processes:

- The most recent version of the Lewes District Council Land Availability Assessment 2024 (LAA) (December 2024) concluded that the site is not deliverable or developable.
- The Mid Sussex District Council Strategic Housing and Economic Land Availability Assessment 2023 (SHELAA) considered a small proportion of the site (1.86 hectares within Mid Sussex) to be potentially suitable for development, but it was not later included in the list of sites allocated for residential development in the emerging Mid Sussex District Plan, which is at examination stage.

Site Reference: 41WV - Not Deliverable or Developable Land adjacent to Cleavewater Barn, Lunces Hill, Haywards Heath			
	Parish or Town Wivelsfield		
Site Area	6.82 Ha		
Greenfield or Previously Developed: Greenfield			
Proposed Development			
Residential			
Site Source			
2023 Submission			
Current or Last Use	Agricultural		
Recent and Relevant Planning History	No recent or relevant planning history.		
Theoretical Residential Capacity	102 homes	Indicative Density	20 dph
LAA Indicative Residential Capacity	0 homes		
LAA Indicative Employment Capacity	Not assessed		
Suitability Assessment			
Residential Suitability: Not suitable			

Figure 1: Extract from the LAA, site reference 41WV.

1.6. We offer LDC and MSDC our involvement in the application process, should they wish to involve us or if any clarifications are required.

2. Policy Framework and Planning History

2.1. The policy framework for the site is established in the following plans and policies that form the Development Plan in the area:

Mid Sussex District

- **Haywards Heath Neighbourhood Plan (HHNP) (2016)**
 - Policy EN1: Loss of open spaces
 - Policy E5: Local gaps
 - Policy E6: Green infrastructure
 - Policy E7: SuDS
 - Policy E8: Sustainable design
 - Policy E9: Local character
 - Policy E11: Development on the edge
 - Policy E13: Outdoor space
 - Policy B1: Retail development
 - Policy T1: Pedestrian and cycle connections
 - Policy T2: cycling routes to the railway station
 - T3: Parking
 - L5: New community services
- **Mid Sussex District Plan (MSDP) 2014 – 2031 (2018)**
 - DP4: Housing
 - DP5: Planning to Meet Future Housing Need
 - DP6: Settlement Hierarchy
 - DP12: Protection and Enhancement of Countryside
 - DP13: Preventing Coalescence
 - DP14: Sustainable Rural Development and the Rural Economy
 - DP15: New Homes in the Countryside
 - DP20: Securing Infrastructure
 - DP21: Transport
 - DP22: Rights of Way and other Recreational Routes
 - DP23: Communication Infrastructure
 - DP24: Leisure and Cultural Facilities and Activities
 - DP25: Community Facilities and Local Services
 - DP26: Character and Design
 - DP27: Dwelling Space Standards
 - DP28: Accessibility
 - DP29: Noise, Air and Light Pollution

- DP30: Housing Mix
- DP31: Affordable Housing
- DP34: Listed Buildings and Other Heritage Assets
- DP37: Trees, Woodland and Hedgerows
- DP38: Biodiversity
- DP39: Sustainable Design and Construction
- DP41: Flood Risk and Drainage
- DP42: Water Infrastructure and the Water Environment
- **Emerging Mid Sussex District Plan 2021 – 2039**, at examination stage.

Lewes District

- **Wivelsfield Parish Neighbourhood Plan (WPND) (2016) (revised in 2021).**
 - Policy 1: A Spatial Plan for the Parish
 - Policy 2: Housing Site Allocations
 - Policy 5: Design
 - Policy 6: Green Infrastructure & Biodiversity
- **Lewes District Local Plan Part 2 (LPP2) – Site Allocations and Development Management Policies (2020)**
 - DM1: Planning Boundary
 - DM14: Multifunctional Green Infrastructure
 - DM15: Provision for Outdoor Playing Space
 - DM16: Children's Play Space in New Housing Development
 - DM19: Protection of Agricultural Land
 - DM20: Pollution Management
 - DM21: Land Contamination
 - DM22: Water Resources and Water Quality
 - DM23: Noise
 - DM24: Protection of Biodiversity and Geodiversity
 - DM25: Design
 - DM26: Refuse and Recycling
 - DM27: Landscape Design
 - DM29: Garages and other buildings ancillary to existing dwellings
 - DM30: Backland Development

- DM33: Heritage Assets
- DM35: Footpath, Cycle and Bridleway Network
- **Lewes District Local Plan Part 1 – Joint Core Strategy (JCS) 2010 – 2030 (2016)**
 - Spatial Policy 1: Provision of Housing and Employment Land
 - Spatial Policy 2: Distribution of Housing
 - Core Policy 1: Affordable Housing
 - Core Policy 2: Housing Type, Mix and Density
 - Core Policy 7: Infrastructure
 - Core Policy 8: Green Infrastructure
 - Core Policy 10: Natural Environment and Landscape
 - Core Policy 11: Built and Historic Environment & Design
 - Core Policy 12: Flood Risk, Coastal Erosion and Drainage
 - Core Policy 13: Sustainable Travel
- **Emerging Lewes District Local Plan**, at Regulation 18 stage.

2.2. Pre-application advice (ref. **PREAPP/24/0130**) was given by LDC to the Applicant in March 2025 for a development proposal of 130 dwellings and the change of use of an existing barn to Class E or F2, with associated outdoor space and landscaping, drainage infrastructure, hard and soft landscaping, parking, access and associated works. The proposal involved the same parcel of land at application stage, at land East of Lunce's Hill.

2.3. The Applicant lodged a request for pre-application advice to LDC on the 12th of December 2024, and there was a target response date of the 6th of February 2025. As it transpired, the Applicant lodged the application on the 17th of February, which was later validated on the 13th of March. The pre-application advice letter was only issued on the 26th of March, after the ongoing planning application had been validated. This timeline leads us to think that the Applicant did not have the opportunity (nor the intention) to address any concerns that the LPA would raise at pre-application stage.

2.4. The following points summarise the pre-application advice letter sent by LDC to the Applicant:

- The site falls outside of any defined planning boundary as identified in LPP2 and, therefore, policy DM1 applies.
- The development is far from the closest settlements in the Lewes District (Wivelsfield and Wivelsfield Green), and it would not benefit from easy or convenient access to services within the district.

- The layout design is incongruous with the landscape, and the development sits adjacent to Ancient Woodland.
- LDC identified impacts in terms of harm to the countryside, being a car-dependent development, no mention of affordable housing provision, no pavement or streetlighting at the entrance of the site, very limited access to nearby amenities (shops and services) and limited bus service.
- The development would not be supported by the LPA due to its location outside of the settlement boundary. The benefit of a car-dependent dormitory development would not outweigh the harm to the countryside and the adjacent Ancient Woodland.

2.5. Pre-application advice was provided by MSDC to the Applicant, but WPC was not consulted in the pre-application process, and it was not given access to the pre-application advice letter when it requested it.

2.6. With the above background in mind, WPC would like to highlight a number of matters and concerns regarding these development proposals.

3. Principle of development

3.1. The site (Land East of Lunce's Hill) is entirely within the countryside, outside of any planning/built-up area boundary, as defined in policies DM1 and DM2 of LPP2 and policy DM12 of MSDP. The site is also not allocated for residential development. Therefore, the Development Plan is not supportive of residential development in this location.

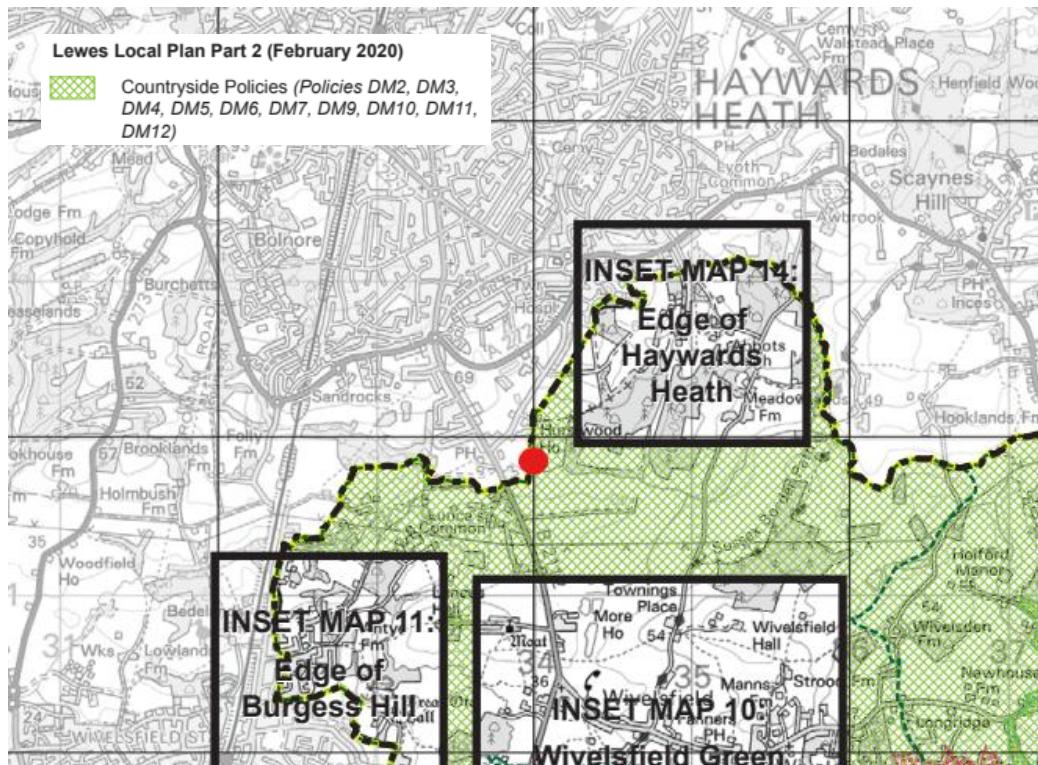


Figure 2: Policies Map of the area showing the location of the application site (red dot) outside of any planning boundary and within the countryside (policy DM1) in Lewes District.

Application site section within Lewes District

- 3.2. The Lewes District part of the application site (6.95 ha.) falls within Wivelsfield Parish, and therefore the WPNP is applicable and forms part of the Development Plan in the area. The site in question is located outside of the defined planning boundary and is within the countryside, not being allocated for development in the Lewes District Local Plan (parts 1 and 2) and the WPNP. The WPNP directs development within the settlement boundaries, also encouraging the use of previously developed land and of land that currently detracts from the appearance of the settlement.
- 3.3. The purpose of the planning (settlement) boundaries in policy DM1 (LPP2) is to positively focus growth on sustainable settlements, reduce the need to travel and protect the intrinsic character and beauty of the countryside. Policy DM12 of MSDP also aims to protect valued landscapes for their visual, historical and biodiversity qualities. Our representations explain how the proposed development fails to meet the policy requirements of DM1 (LPP2) and DM12 (MSDP), and conflicts with their purposes.
- 3.4. Policy DM1 (LPP2) states that the countryside will be protected, and new development will only be permitted where it is consistent with a specific development plan policy or where the need for a countryside location can be demonstrated. The only exceptions considered in the Development Plan involve rural exception sites, accommodation for agricultural and other rural workers and conversions of redundant agricultural and other buildings. This development proposal does not fall within any of the above-mentioned exceptions to residential uses in the countryside and cannot demonstrate the need for a countryside location.
- 3.5. Furthermore, the site falls outside of the WPNP defined development boundaries in the Wivelsfield Parish, where the plan directs future housing, economic and community related development (Policy 1). The WPNP only supports development proposals outside boundaries where they are consistent with the countryside policies of the Development Plan, which we have explained above that the development proposal fails to comply with. Furthermore, the site is not allocated in Policy 2 of the WPNP for housing either.
- 3.6. The JCS identified a minimum growth of 30 units for Wivelsfield Parish (Spatial Policy 2), through sites that could be identified via Neighbourhood Development Plans. The WPNP then allocated three sites for residential development adding a total of 34 new homes, adjacent to near the Wivelsfield Green settlement boundary where development would contribute to local communities and the long-term viability of local facilities and services. The table below outlines the allocations and their status.

NDP site allocation	Units	Status
Land at Springfield Industrial Site, West of B2112	Approximately 30 dwellings	Planning permission granted for 30 new dwellings in September 2023. Ref. LW/21/0867.
The First Site on Land at Hundred Acre Lane	Approximately 2 dwellings	Planning permission granted for 2 dwellings in 2018. Ref. LW/18/0437 (now built).
The Second Site on Land at Hundred Acre Lane	Approximately 2 dwellings	Application for 2 dwellings withdrawn in 2021. Ref. LW/21/0192 Application for 1 dwelling refused. Appeal ongoing. Ref. LW/22/0421
Total (of 30 units JCS requirement)	Approximately 34 dwellings allocated in the WPNP	32 dwellings granted permission

Figure 3: Table showing the status of the three WPNP allocations.

3.7. In addition to the allocated sites in the WPNP, which have progressed well since the NDP was made in 2016 and updated in 2021, there have been several recent planning permissions that added significant unplanned new homes to Wivelsfield Parish. **Appendix 1** outlines all relevant planning permissions granted recently, which illustrates the disproportionate increase in unplanned residential development in the parish.

3.8. In the JCS plan period from 2010 to 2030, the 243 homes figure to be delivered in Wivelsfield Parish (through strategic sites on the edges of Haywards Heath and Burgess Hill, and in Wivelsfield Green three allocations), has been substantially exceeded, reaching a total of 650 new homes (See **Appendix 1**). This translates to a 267% increase over the expected housing figure for the Parish. Most of the sites in Appendix 1 have come forward and have been completed or are in the process of being implemented (either having planning permission or being under construction) and further speculative applications are being submitted to the LPA. Unfortunately, the development of 650 homes beyond the Development Plan's figures (the majority of which were unplanned for by the LPA), is not only excessive in terms of quantum and scale, but is also lacking the necessary infrastructure to support such a substantial increase in housing.

3.9. The proposed development would add an additional 130 new dwellings to the parish despite all the dwellings granted permission in Appendix 1, entailing a provision of homes of 780 units where the JCS planned for only 243 units in the parish. Proportionately, this would mean a housing provision of 320% above the

initially planned increase of new homes expected over the plan period of the WPNP and JCS.

3.10. This amount of unplanned development is clearly disproportionate and unsustainable for a parish, whose settlements sit very low in the settlement hierarchy, and score low in terms of facilities, services, jobs available and overall accessibility. WPC considers that a degree of growth may help sustain and support local services in Wivelsfield Parish, however, this has not been the case regardless of the new unprecedented and unplanned increase in development since the WPNP was made. Furthermore, the location on the edge of Haywards Heath would entail that the growth proposed in Wivelsfield Parish would only contribute to sustaining services in Haywards Heath only, as services in Wivelsfield are very limited and access to these by sustainable transport options is very limited. Considering the above, WPC considers that this development proposal would be contrary to the spatial strategy of the JCS and spatial considerations in LPP2 and WPNP.

Application site section within Mid Sussex District

3.11. Similarly to the planning framework in Lewes District, the MSDP states in Policy DP6 that development will be permitted within towns and villages within defined built-up area boundaries. It also supports the growth of settlements where it meets identified housing, employment and community needs. The policy supports the expansion of settlements outside of the built-up boundaries where sites are allocated for development. The proposed development falls within an area designated as countryside and not allocated for housing development in the HHNP or the MSDP and the 2022 Site Allocations Development Plan Document (DPD). Therefore, the proposal conflicts with Policy DP6.

3.12. The HHNP and the MSDP form the Development Plan in the Mid Sussex area of the application site (1.86 ha). These plans identify the area in question as a Green Corridor and as an area outside of the Built-Up Area Boundary, within the countryside, which the relevant policies require protecting and enhancing. The HHNP also designates the area in question as a local gap between Haywards Heath and neighbouring Towns/Parishes to create a landscape buffer.

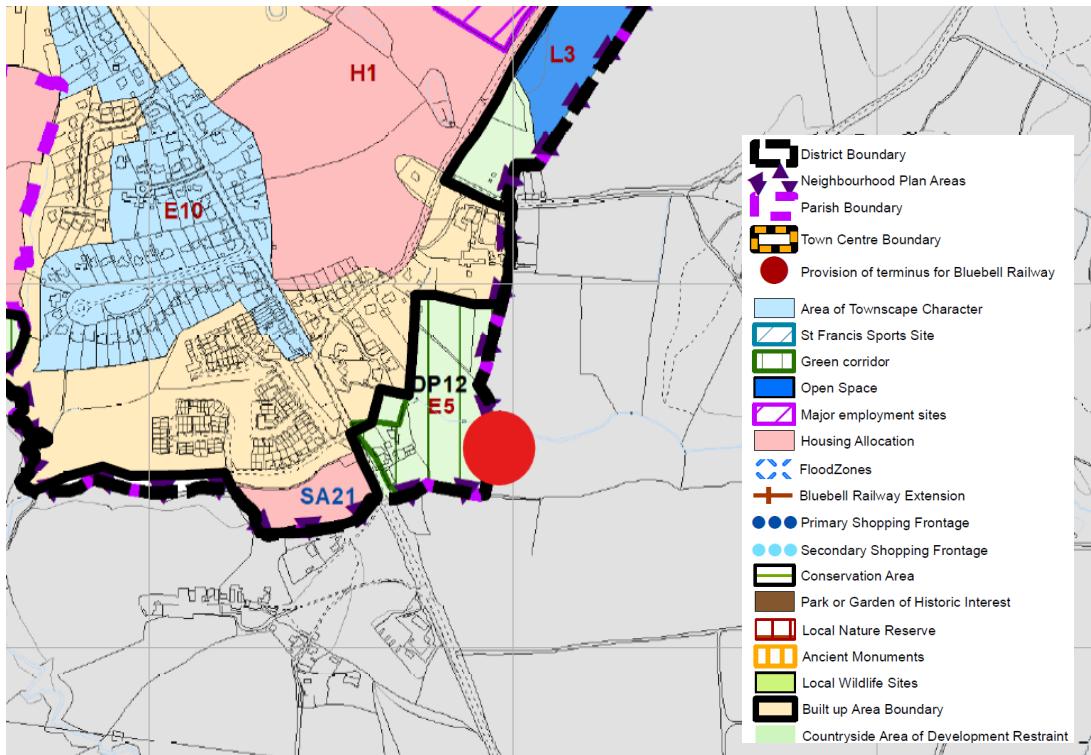


Figure 4: Policies Map of the area of the application site (red dot) outside any built-up area boundary and within the countryside and Green Corridor (policies DP12 MSDP and E5 HHNP) in Mid Sussex District.

3.13. Planning permission was granted in 2014 (ref. 14/02677/FUL and subsequent variations of planning permissions up to 2024) for the erection of two dwellings (later amended to four units) within a modest parcel of land north of the application site, partly within the MSDP designated Green Corridor and outside the built-up area (Policy DP12). The land in question is also protected by a local green gap in Policy E5 of the HHNP. Notwithstanding the above Development Plan designations, some degree of residential development was allowed due to the first planning permission being granted prior to the adoption of the MSDP and the HHNP being made. Furthermore, officers considered at the time that the small scale of the development (between 2 and 4 homes) and its design would be consistent with the Development Plan, especially in light of other material considerations, such as the planning history. Notwithstanding this, the above planning history on an adjacent site would not justify a departure from the Development Plan as now proposed.

3.14. Whilst the above is an exception to the restrictions on residential development in the countryside, the Development Plan does not support the development of the proposed nature and scale in the proposed location. No other material considerations, such as the planning history, could be claimed by the Applicant.

3.15. Policy DP6 also supports small housing development of less than 10 dwellings outside the built-up area where they are contiguous to the existing built-up area boundary and their sustainability is demonstrable.

3.16. The Applicant claims that the development proposal is only in partial conflict with Policy DP6 as the policy supports the principle of expanding settlements and it only conflicts with it insofar proposals are over the 10 dwellings threshold, stating that the site is contiguous to the settlement (built-up area) boundary, and it is a sustainable form of development. However, WPC considers that the Applicant's interpretation is wrong. Policy DP6's supporting text states that outside built-up area boundaries, "*the primary objective of the District Plan with respect to the countryside (as per Policy DP12: Protection and Enhancement of Countryside) is to secure its protection by minimising the amount of land taken for development and preventing development that does not need to be there. It is recognised that in order for the villages to continue to grow and thrive, in many cases, it is necessary to expand beyond the existing built-up area boundaries. By allocating housing sites, such as through Neighbourhood Plans, it will be possible to meet local needs by providing sufficient market and affordable housing and to support and develop local services and facilities such as local schools and shops.*" Therefore, Policy DP6 only supports the expansion of settlements where planned and identified through allocations in the Development Plan, and it does not support unplanned growth of the scale proposed. The Applicant's interpretation of the policy is incorrect and would leave the door open to unplanned development in breach of the spatial strategy and housing allocations.

3.17. Policy DP12 protects the countryside and only supports development outside built-up area boundaries where it maintains or where possible enhances the quality of the rural and landscape character of the district, and it is necessary for agriculture, or it is supported by a specific policy reference either elsewhere in the Plan, a DPD or relevant Neighbourhood Plan. In that regard, the proposed development is not necessary for agricultural purposes, it is not supported by any other reference (or allocation in the Development Plan) and would have to demonstrate that it maintains or, where possible, enhances the quality of the rural and landscape character of the district. WPC's view is that the development fails to maintain and enhance the rural and landscape character of the area, which we will discuss in subsequent sections of this report.

3.18. Policy DP15 (New Homes in the Countryside) is also relevant as it relates to housing in the countryside, which is only supported if it is not in conflict with Policy DP12 and there is special justification, such as agricultural dwellings, new isolated homes (paragraph 84 NPPF), it is a rural exception site or complies with Policy DP6. This development does not meet any of the above requirements and, as above-mentioned, fails to comply with other relevant policies, such as DP6 and DP12.

Emerging Local Plans of Mid Sussex and Lewes

3.19. Furthermore, the emerging Local Plans for Mid Sussex and Lewes do not contemplate the allocation of the application site for residential development, but they carry on with the level of protection given to this land in the adopted Development Plans. The emerging Mid Sussex District Plan, which is at examination

stage, seeks to allocate three sites on the edge of Haywards Heath for a total of 126 dwellings, but not at Land East of Lunce's Hill. The largest allocation in Haywards Heath is sustainably located in the Town Centre, near the train station and other key services, benefiting from excellent access to facilities, services, employment and public transport. No development of the proposed scale is anticipated on the edge of the settlement in the emerging Local Plan, and therefore, any development such as the one proposed would also be contrary to the spatial strategy of the emerging Mid Sussex District Plan.

3.20. Moreover, the emerging Lewes District Local Plan, which is at Regulation 18 stage, has already proposed a list of 'early site allocation proposals' including 23 sites for residential development, none of which are in Wivelsfield Parish. The rationale for this is explained later in these representations, however, it provides a useful and important indication of how the spatial and development strategy is evolving in the District, directing development to more sustainable locations within Lewes District, not on the edge of Haywards Heath, and in less sensitive locations, where development could contribute to the viability and vitality of Lewes District's local communities. In light of the above, the application site is not supported by the emerging Local Plan, which does not include any allocations in Wivelsfield Parish.

3.21. Therefore, neither the adopted Development Plan nor the emerging plans are supportive of the proposed development in this location.

Lewes District Interim Policy Statement for Housing Delivery

3.22. The Lewes District Development Plan provides a clear framework for growth within settlement boundaries. In the case of exceptional development outside boundaries, engaging the presumption in favour of sustainable development (paragraph 11 NPPF), LDC produced the Interim Policy Statement for Housing Delivery (March 2020), which is also relevant in the assessment of the Lewes District planning application.

3.23. LDC produced the Interim Policy Statement for Housing Delivery (March 2020), to direct development outside of policy boundaries (DM1) in the countryside to areas where the harm caused would be lower and the location would be most sustainable. Whilst the statement is guidance and not policy, it carries weight in the decision-making and WPC has reviewed the criteria and provided comments on how the site performs against each criterion.

3.24. We are aware that the Applicant has provided their analysis of compliance with the criteria below, and we would like to provide LDC with an unbiased review of the Interim Policy Statement for Housing Delivery, as it relates to this application:

Criteria	Assessment
<p>The site boundary is contiguous with an adopted settlement planning boundary, as defined on the Local Plan Policies Map.</p>	<p>The application site does not adjoin any settlement/planning boundary within Lewes District, the district to which the interim policy statement applies.</p> <p>It is in close proximity to the Haywards Heath built-up boundary, although it only shares less than 100 metres of the site's boundary with the built-up area boundary, of the total of 1,600 metres of boundary of the application site. Therefore, the site only shares 6% of its boundary with the settlement/built-up area, and this settlement is not even in Lewes District.</p>
<p>The scale of development is appropriate to the size, character and role of the adjacent settlement, having regard to the settlement hierarchy.</p>	<p>The application site is 8.81ha, and the residential development area is 4ha, including all associated infrastructure (attenuation basins, roads, access, etc.). The scale of the development is disproportionate to the scale of the nearest settlements in Lewes District (Wivelsfield). It is also disproportionate to the scale of the site allocations being proposed in the emerging Mid Sussex District Plan, which focuses residential development on the Town Centre, with the other three edge of settlement sites. This proposal for 130 homes would be significantly larger than the largest site allocation (100 homes in the Town Centre) of the emerging Local Plan and the edge of settlement allocations (60, 30 and 36 homes).</p> <p>Furthermore, it would cement the poor design approaches found in the area of development at depth in a suburban typology, which departs from and detracts from the locally characteristic settlement pattern along routes.</p>
<p>The proposed development will provide safe and convenient</p>	<p>The development provides pedestrian access, but it is neither convenient nor safe</p>

<p>pedestrian and cycle access to key community facilities and services.</p>	<p>to use as the location and design of the scheme promote car use instead. There are no dedicated and segregated cycle routes to and from the site, existing or proposed, and given the edge of settlement location and distance to key services, and the town centre, cycling and walking are not safe, inclusive and convenient options for all.</p>
<p>The proposed development, individually or cumulatively, will not result in the actual or perceived coalescence of settlements.</p>	<p>Whilst there is some distance between Haywards Heath and Wivelsfield settlement (approximately 500 metres at its nearest point), this development, on its own, will contribute to the physical and perceived coalescence of Haywards Heath and Wivelsfield and More House Farm Business Centre (in Wivelsfield Parish), which are separated by a countryside gap. The gap is important to ensure the separation between settlements and the proposed housing development, due to its location and scale will narrow the existing gap and will widen the southern boundary of Haywards Heath on its southern end, where the gap with Wivelsfield is even more relevant. The proposed development will also suburbanise and deteriorate this part of the gap between settlement boundaries.</p>
<p>Within the setting of the South Downs National Park (SDNP), an assessment is undertaken to demonstrate that the proposed development will conserve the special qualities of the SDNP.</p>	<p>N/A</p>
<p>An ecological impact assessment is undertaken and appropriate measures identified and implemented accordingly to mitigate any potential adverse impacts of the development on biodiversity and secure biodiversity net gain.</p>	<p>Regardless of the submitted biodiversity net gain report, the development will result in habitat fragmentation and the loss of ecological connectivity. Furthermore, it would lead to the deterioration of the adjacent ancient woodland, especially due to indirect effects, such as disturbance.</p>

<p>The proposed development will make the best and most efficient use of the land, whilst responding sympathetically to the existing character and distinctiveness of the adjoining settlement and surrounding rural area.</p>	<p>The proposal does not constitute the best and most efficient use of land. It is a low-density suburban scheme of 130 dwellings with significant spaces left over after planning, with no meaningful function. Furthermore, it does not respond sympathetically to character and distinctiveness due to its significant departure from the characteristic pattern of the settlement, harm to the setting of historic Grade II Listed Buildings, Ancient Woodland and the erosion of the existing open rural land gap between settlements.</p>
<p>It can be demonstrated that the proposed development is deliverable and viable, having regard to the provision of necessary on-site infrastructure, including affordable housing, green infrastructure and other requirements.</p>	<p>The Interim Policy Statement for Housing Delivery, produced by LDC says that applications are expected to be accompanied by evidence of deliverability at the time they are submitted, but no such evidence has been provided. For instance, the application is silent on the obligations required, such as Policy T2 of the HHNP's contributions towards cycling routes to the railway station. This and other obligations should be considered in a deliverability and viability assessment.</p>

3.25. WPC is of the view that **the proposed development fails to comply with the guidance contained in the Interim Policy Statement for Housing Delivery (2020).**

3.26. The site is not contiguous to any settlement in Lewes District and whilst the Applicant contests that site boundary is contiguous to Haywards Heath, the shared boundary is very limited and, functionally, the site is very much detached from Haywards Heath due to its location on the edge, its significant depth, layout design of numerous pockets of development and cul-de-sacs and the location of the single access point for 130 homes at the remotest point from the settlement.

3.27. The development is of a scale that is not appropriate to the size, character and role of Wivelsfield settlement (nearest settlement within Lewes District) and Wivelsfield Parish (the Parish within which it falls), also not adhering to the settlement hierarchy. It also contributes towards the coalescence of settlements by reducing the countryside gap between Haywards Heath and Wivelsfield, and it promotes car usage rather than active travel and public transport, due to its location, design and lack of contributions towards active travel infrastructure. Finally, it is also worth highlighting that it negatively affects the local character and

settlement pattern and replaces locally characteristic farmland edge of settlement character with 'anywhere' suburban development that fails to make an efficient use of land and fails to respond sympathetically to its context (and historic buildings). Consequently, WPC considers that the development does not comply with the Interim Policy Statement for Housing Delivery.

3.28. The assessment table above is further explained and developed later in these representations, in each topic section.

The presumption in favour of sustainable development

3.29. LDC states in the pre-application advice letter issued in March 2025 that it is unable to demonstrate a five-year housing land supply and therefore, decisions on planning applications will have to be made in accordance with paragraph 11 of the NPPF, which relates to the presumption in favour of sustainable development.

3.30. The presumption in favour of sustainable development in paragraph 11 c) of the NPPF means, for decision taking, approving development proposals that accord with an up-to-date development plan without delay. Considering the above assessment, the planning application in question should be refused due to proposals being contrary to the spatial strategies of both districts' Development Plans.

3.31. However, for planning applications such as this one, according to the NPPF, the presumption in favour of sustainable development entails granting planning permission for new development in the cases when the LPA cannot demonstrate a five-year housing land supply, unless:

- There is a strong reason for refusal based on the application of policies in the NPPF that protect areas or assets of particular importance: habitats sites, a SSSI, a Green Belt, a Local Green Space, a National Landscape, a National Park, a Heritage Coast, irreplaceable habitats, designated heritage assets and areas at risk of flooding or coastal change; or,
- any adverse impacts of granting permission would significantly and demonstrably outweigh the benefits, when assessed against the policies in the NPPF, having particular regard to key policies for directing development to sustainable locations, making effective use of land, securing well-designed places and providing affordable homes, individually or in combination.

3.32. Considering that the site is not protected by any of the NPPF designations in the first bullet point above, the only applicable scenario is to consider whether any adverse impacts would significantly and demonstrably outweigh the benefits. LDC's pre-application response concludes that there are adverse impacts of the scheme that would significantly outweigh any benefits. The identified adverse impacts are several, but LDC gives especial relevance to the location of the development proposal, outside of the settlement boundary, far from services (especially those within Lewes District) and its limited sustainable transport options (resulting in a

car-dependant community) as well as the identified harm to the countryside and adjacent Ancient Woodland.

3.33. The Applicant claims in the Planning Statement that paragraph 11 d) of the NPPF applies and it would warrant supporting the principle of development in this location. The test covered in NPPF paragraph 11d (adverse impacts vs. benefits) is discussed in specific sections below.

3.34. It is also worth highlighting that the NPPF (paragraph 12) establishes limits to the presumption in favour of sustainable development:

"The presumption in favour of sustainable development does not change the statutory status of the development plan as the starting point for decision-making. Where a planning application conflicts with an up-to-date development plan (including any neighbourhood plans that form part of the development plan), permission should not usually be granted."

3.35. The Applicant also suggests that the most important policies of the Development Plan are out of date, as none of the LPAs can demonstrate a five-year housing land supply of deliverable housing sites. However, this is not correct, as the housing policies of the Development Plan may be out of date due to the inability of MSDC and LDC to demonstrate a five-year housing land supply, but their spatial strategies, insofar as they are designed to avoid harm to the countryside, protect landscape buffers and ecological connectivity, protect the setting of settlements and their identity, and direct development to sustainable locations, such as brownfield sites within settlements, remain valid and relevant.

3.36. Whilst the Applicant considers that the Development Plan is outdated, WPC considers that policies DM1 (LPP2), 1 (WPNP), DP6, DP12 and DP15 (MSDP) and E5 (HHNP) are relevant in the assessment of this application as they form part of the spatial strategy in the area. Policy DP4 (Housing) of the MSDP and Spatial Policies 1 and 2 of the JCS may be challenged by the Applicant as they make provision for housing land, but the other spatial strategy according to the settlement hierarchy and countryside strategy policies in the Development Plans only set out a strategy (to be complied with by all developments) to direct where development should be focused, primarily within planning boundaries in Lewes District or built-up area boundaries in Mid Sussex. Even in the event of the Development Plan being out-of-date and engaging the presumption in favour of sustainable development, development could and should be focused to the more appropriate locations in the district, which is what policies DM1 (LPP2), 1 (WPNP), DP6, DP12 and DP15 (MSDP) and E5 (HHNP) aim to do. This is because, according to the NPPF, the presumption in favour of sustainable development does not change the statutory status of the development plan as the starting point for decision-making.

3.37. Paragraph 14 of the NPPF is also relevant where residential development proposals conflict with Neighbourhood Plans:

"In situations where the presumption (at paragraph 11d) applies to applications involving the provision of housing, the adverse impact of allowing development that conflicts with the neighbourhood plan is likely to significantly and demonstrably outweigh the benefits, provided the following apply:

- a) the neighbourhood plan became part of the development plan five years or less before the date on which the decision is made; and*
- b) the neighbourhood plan contains policies and allocations to meet its identified housing requirement (see paragraphs 69-70)."*

3.38. Both Neighbourhood Development Plans applicable to this development (WPNP and HHNP) were made in 2016, and whilst the HHNP is more than 5 years old, the WPNP was revised in 2021. Most of the application site (and most of the housing development) is located within Wivelsfield Parish, and therefore, the WPNP is important in the consideration of this planning application. Given that the plan was revised in 2021 and has only 4 years since it was last updated, we do not consider that the plan is out of date.

3.39. The 2021 revised WPNP stated that policies in the Neighbourhood Plan are in 'general conformity' with the relevant Development Management Policies of the LPP2 and no changes were required to the plan. The revision document acknowledged that the JCS was more than 5 years old at the time of the revision and that it could have implications in favour of sustainable development, but LPP2 did not identify additional residual housing growth beyond the allocation in the WPNP, as most allocations were identified elsewhere in Lewes District, according to LPP2's spatial strategy and settlement hierarchy.

3.40. The WPNP did not seek to identify and allocate land for development in the plan area when it was revised in 2021 because the scale of development that had come forward had more than exceeded the Development Plan housing requirements. The WPNP is a positive document that is aligned with the Local Plan, the scale and directions of growth established in this. Any additional housing site allocation in the WPNP would have been contrary to the Local Plan and the NPPF, in light of the recent planning history of the Parish and increasing housing numbers. This is because any significant housing allocation would be a strategic matter that would be addressed as part of a spatial strategy in the Local Plan.

3.41. Paragraph 13 of the NPPF states that neighbourhood plans should support the delivery of strategic policies contained in local plans or spatial development strategies and should shape and direct development outside of these strategic policies. In that regard, the WPNP, as worded and updated, complies with the Local Plan and paragraph 13 of the NPPF.

3.42. Considering the above, the Applicant's view that the WPNP is out-of-date because it is more than 5 years old is not accepted, as it was updated 4 years ago. Furthermore, the WPNP contains policies and allocations to meet the identified

housing requirements, including housing allocations. No further allocations were included, given that the emerging Lewes District Local Plan is in the process of identifying and allocating sites for housing growth. None of these are expected to take place in Wivelsfield Parish, as it would not be consistent with the spatial strategy and settlement hierarchy of the adopted and emerging Local Plan led by Lewes District Council, as strategic policy-making authority.

3.43. It is WPC's view that paragraph 14 of the NPPF is engaged for the reasons explained above, and that the adverse impact of allowing development that conflicts with the neighbourhood plan significantly and demonstrably outweighs the benefits. We explain below the adverse impact of the development proposal and the benefits of a complete assessment, considering the presumption in favour of sustainable development.

Adverse impacts

3.44. As explained in the relevant sections later in these representations, WPC is concerned that the proposed development would lead to the following adverse impacts:

- Heritage harm: The development would result in less than substantial harm to the setting of Cleavewater, a nearby Grade II listed building, and would adversely affect the historic character of Lunce's Hill, a rural lane with heritage value.
- Landscape and visual impact: The site lies within an open rural landscape and would be fundamentally transformed into a suburban form of development, resulting in a significant loss of rural character and a detrimental effect on the countryside and the nearby Ancient Woodland.
- Unplanned growth in unsustainable location: The development is outside any defined settlement boundary and not allocated for housing in either the Lewes or Mid Sussex Development Plans. It would contribute to a 320% increase above the planned housing target for Wivelsfield Parish, undermining the spatial strategy of the development plan.
- Car-dependent design: The proposal does not provide safe or convenient pedestrian or cycle access to local services. Residents would be heavily reliant on private vehicles due to poor walking and cycling infrastructure and inadequate public transport connections.
- Failure to integrate with community infrastructure: The proposed scale of development is unsupported by nearby services, and there is no substantive commitment to improving public transport or essential services like GP surgeries or schools, many of which are already over-subscribed.
- Biodiversity and ecological concerns: Potential indirect harm to adjacent Ancient Woodland through increased human disturbance and habitat

fragmentation is a major issue. The proposed development would also interrupt ecological connectivity in the area.

- **Poor design quality:** The layout and density reflect a generic suburban model rather than responding to the site's topography, local character, or historic settlement patterns. The scheme does not embody a landscape-led design approach as claimed.

Potential benefits

3.45. The development proposal is claimed by the Applicant to deliver the following benefits:

- **Market and affordable housing provision:** The scheme includes a commitment to provide 130 new homes, of which 40% are to be affordable in the Lewes part of the site and 30% in Mid Sussex.
- **New open spaces and infrastructure:** The proposal includes the provision of green space and the conversion of a barn for community or commercial use, though details remain limited.

Conclusion

3.46. WPC is of the view that the proposed development is contrary to the adopted Mid Sussex and Lewes Development Plans. The development is also found to conflict with the Lewes Interim Policy Statement for Housing Delivery. Consequently, the development of 130 new homes and associated works should not be supported in principle.

3.47. In line with paragraph 11 d) ii) of the NPPF, development proposals should be granted unless the adverse impacts of doing so would significantly and demonstrably outweigh the benefits. In this case, the proposed development is located in open countryside, outside of settlement boundaries, and conflicts with the adopted and emerging spatial strategies of both Lewes and Mid Sussex Development Plans. It undermines the principles of plan-led growth and is contrary to up-to-date Neighbourhood Plans, particularly the 2021-revised Wivelsfield Parish Neighbourhood Plan, which directs growth to more sustainable, plan-allocated locations.

3.48. While the delivery of affordable housing and a community-use barn may constitute modest benefits, these do not outweigh the numerous and substantial harms identified. These include the degradation of heritage assets, unsustainable travel patterns, encroachment on valued landscapes and ecological features, and a failure to deliver genuinely sustainable or locally integrated growth.

3.49. The adverse impacts are not only numerous but also fundamental for this area. Therefore, **the harm resulting from the development would significantly and demonstrably outweigh the benefits, and the presumption in favour of sustainable development does not apply.**

3.50. If LDC and MSDC disagree with WPC's view on the principle of development, WPC has also assessed other aspects of the proposed development and highlights issues and makes recommendations to the LPA as to why the application should be refused.

4. Sustainability, Transport and Accessibility

4.1. WPC objects to the proposed residential development due to the site being in an unsustainable location, as Wivelsfield Parish is not sufficiently equipped with facilities, services, employment or public transport required to enable sustainable living. Furthermore, the site is located on the edge of Haywards Heath, a settlement that falls outside of Lewes District, and whilst being high in the settlement hierarchy of MSDP, the site is nevertheless located outside of the settlement, beyond its edge, and far away from the town centre and key services and facilities. The Lewes Development Plan's spatial strategy does not support this location for new development, especially of the proposed scale, as it is detached from Lewes' settlements and services. The Development Plan in Mid Sussex is also not supportive of edge-of-settlement extensions that are not demonstrably sustainable.

4.2. The purpose of policy DM1 (LPP2) is "*to positively focus growth on sustainable settlements [in Lewes District], reduce the need to travel, and protect the intrinsic character and beauty of the countryside, in accordance with the spatial strategy set out in the Local Plan Part 1*". Unfortunately, the proposed scheme would add growth to a settlement outside of Lewes District, with no functional connection to the nearest settlements in Lewes District (Wivelsfield and Wivelsfield Green). The site would fail to reduce car travel, achieving the opposite, which is a new community that would substantially rely on private car use.

Settlement Hierarchy

4.3. The Applicant justifies the sustainability of the site on Haywards Heath being in Category 1 of the settlement hierarchy in the MSDP. Category 1 settlements are defined as those "*with a comprehensive range of employment, retail, health, education leisure services and facilities. These settlements will also benefit from good public transport provision and will act as a main service centre for the smaller settlements*". Whilst the above seems to imply that Haywards Heath is a sustainable settlement, the actual edge of town location of the application site is concerning due to the poor accessibility to employment, services and facilities, and public transport options. We assess the actual accessibility of the site later in the representations.

4.4. Considering that most of the site sits within Wivelsfield Parish (Lewes District), we believe that the settlement hierarchy in the Lewes area Development Plan is also relevant. The JCS and the Interim Policy Statement for Housing Delivery classify the nearest settlements in Lewes District as very low in the hierarchy. Wivelsfield is a 'Hamlet', which is the lowest tier in the hierarchy, and it is defined as "*settlements*

that generally have a population of less than 100, have an historic core (generally with a church), but are generally lacking social infrastructure and ease of accessibility to higher order settlements". The second nearest settlement in the district is Wivelsfield Green, a 'Service Village', which is in the fifth tier in the settlement hierarchy and is defined as "*villages that have a basic level of services and facilities, public transport provision (possibly not frequent) and limited employment opportunities. Residents can have some of their day-to-day needs met in such locations, although higher order settlements need to be accessed to enable this to be fully achieved*". This highlights how low the nearest settlements in Lewes District score, due to the limited public transport and few basic facilities available.

4.5. The evidence from LDC regarding settlement hierarchy and services was reviewed and produced in July 2023, including a Settlement Hierarchy Review and Settlement Services Review in support of the emerging Lewes District Local Plan. The updated evidence concluded that Wivelsfield should remain at the lowest tier (Hamlet) and that Service Villages (such as Wivelsfield Green) should be revised down to 'village'. Furthermore, Wivelsfield Green remains the lowest-scoring settlement in the Service Village tier, and the bus services in the area have also been revised down from frequent to infrequent. The above highlights how poorly the nearest settlements in Lewes District score in terms of services and facilities.

Accessibility and sustainability

4.6. The Planning Statement states that the site will be sustainable considering its proximity to a key road connection, public transport links, and pedestrian infrastructure, despite its edge-of-settlement location. It also states that the proposed pedestrian crossing and upgraded route (we assume it refers to the short section of footway on the B2112 road) will provide obvious and safe pedestrian access, improving connectivity to the site and encouraging travel on foot and by bus. WPC strongly disagrees with the above statement, as the proposed development, regardless of the new B2112 crossing, will be located over 2 kilometres away from the town centre and more than 3km away from the railway station. The only public transport option available would be the existing bus stop 180 metres to the north of the site entrance, which is served by three bus routes (149, 166 and 271/272).

4.7. The submitted Transport Assessment claims that the development, due to its location, access design and residential travel plan, will be able to shift a percentage of the future residents from car use (between 66-80%) to other modes of transport, as shown below. WPC considers this to be an unrealistic expectation and, nevertheless, an alarming transport scenario of significantly high car dependency. We explain the rationale below.

	Car Driver	S.O.V*	Car Pass.	Cycle	Foot	Bus	Home Working	Motor-cycle	Total
Base Mode Share	80.4%	76.5%	3.9%	1.2%	12.3%	1.6%	0.0%	0.6%	100.0%
% Mode Shift	-	-20%	-	-	-	-	-	-	-
Change in Mode Share	-14.3%	-15.3%	+1.0%	+2.2%	+2.1%	+3.0%	+6.0%	0.0%	-
Proposed Target Mode Share	66.1%	61.2%	4.9%	3.4%	14.4%	4.6%	6.0%	0.6%	100.0%

Figure 5: Table showing the base and proposed target mode share. Source: Transport Assessment.

4.8. Given the location of the site and the lack of active travel infrastructure, a very limited number of daily activities would be achievable walking or cycling. The necessary trips for most daily activities would likely be achieved by travelling by private car, as the main and almost single convenient travel option available to future residents of the proposed development. Travelling by bus, whilst possible, is not convenient to all users.

Walking

4.9. The 'Manual for Streets' defines walking neighbourhoods, which are areas where facilities are within a 10-minute walk (or up to 800 metres) with comfortable access by foot. The only destinations that are available within a 10-minute walking distance from the site (eastern residential end of the site) are the bus stop on the B2112 and the Fox and Hounds Pub.

4.10. The Design & Access Statement (D&AS) includes a local services and facilities plan with "approximate" walking distances, but this assessment is flawed as it only considers walking distance from the centre of the site and the site entrance, which is the most ideal and convenient location for the Applicant to assess distances, but it is not realistic as future residents would live further deep into the site, to the east. In that regard, our assessment of walking and cycling distances considers the areas of residential development to the far east within the site, to better understand the distance implications for all residents. Furthermore, the D&AS's assessment assumes all routes are direct lines from the starting point up to 5-, 10-, and 15-minute walking, but this is unrealistic considering the irregular network of routes in the area. A simple check online suggests that the destinations that can be reached in 10 minutes walking are significantly less than anticipated by the Applicant, and that there are no meaningful destinations (services, facilities, etc.) within 800 metres.



Figure 6: Isochrone 15-minute walking map from the application site's east section.

- 4.11. Unfortunately, the scheme's location is a critical factor that defines the walking potential for future residents, where even an improved walking infrastructure would have a limited capacity to increase walkers in a highly car-dependent location.
- 4.12. As shown on the 15-minute walking isochrone map, only a very small section of the south of Haywards Heath is within adequate walking distance to future residents, and no meaningful or sufficient facilities or services (only a pub and a park - a future school) on the edges of the town would be reachable in 15 minutes walking or less. It also illustrates that there is no railway station or employment area, amongst other services and facilities, within walking distance.
- 4.13. The proposed improvements to the B2112 road for pedestrians (footway and crossing) are assessed later in the representations. We consider these to be unacceptable in landscape character and heritage terms, but not only that, they are insufficient to maximise walking opportunities. The proposed layout of the site is designed with pockets of development within fields, isolated from one another,

regardless of some degree of permeability, they do not connect to the surrounding urban and rural environment. There is a single access to the site and no pedestrian permeability connecting the site with other areas around. This is a crucial layout design and access constraint of this development that detracts from active travel and minimises opportunities for walking and cycling.

4.14. Furthermore, the pedestrian environment designed in the layout is poor insofar as it is full of cul-de-sacs and routes with dead ends. Whilst some may provide pedestrian permeability, they are not legible routes and wayfinding would not be easy. Therefore, the environment proposed would be hostile for pedestrians and again, car users would be prioritised, contrary to Policy DM25 (Design) of Local Plan Part 2. The layout seems to favour car use and be determined by highway standards instead of pedestrian convenience, safety and maximising active travel and sustainable transport. Most of the permeable pedestrian infrastructure within the site is formed by informal “recreational” paths within the green spaces left over after planning, which do nothing to support residents in terms of movement and accessibility for their daily life and activities. They are simply recreational routes.

4.15. In the absence of a sustainable location and a well-designed, pedestrian-friendly layout and access strategy, WPC is concerned that the proposed development would fail to meet section 8 of the NPPF, which requires aiming to achieve healthy places that enable and support healthy lives, including layouts that encourage walking and cycling.

Cycling

4.16. WPC has assessed the walking and cycling options available in the area, and we have concluded that walking is not a suitable inclusive option for accessing many services and that the proposed walking infrastructure (shared cycling/walking access track) is clearly neither insufficient nor adequate. Furthermore, the absence of segregated cycling infrastructure within the site and especially in the key routes to the town centre, the railway station and other key destinations in town, makes cycling an unsuitable option.



Figure 7: Isochrone 15-minute cycling map from the eastern residential area of the site.

4.17. In terms of cycling, the above isochrone map illustrates that the Haywards Heath town centre would be within a reasonable cycling distance, as well as the edge of Burgess Hill and Wivelsfield Train Station, which is not in Wivelsfield but in Burgess Hill. There is, however, an important concern with the feasibility and safety of cycling in the existing road network and with its lack of inclusivity.

4.18. Unfortunately, the submitted Planning Statement and Transport Assessment do not sufficiently assess the feasibility of the route network around the application site, such as to the town centre, schools, train station, etc., for potential users. The existing road network is neither convenient nor safe for cyclists, and its theoretical less-than-15-minute cycle distance should not be used as an argument to support the sustainability of the application site and accessibility to other services, including rail. Most of the key destinations within the town (including rail services, retail and other facilities) would only be accessible to experienced cyclists and those ready to put themselves at risk.

4.19. Cycling is not an option available to most future residents of the development, as there is a lack of cycling infrastructure in Haywards Heath (including the B2112 road) and Wivelsfield Parish. Travelling to the south (outside of Haywards Heath) involves long distances within the surrounding countryside, which makes travelling to further away services, facilities and other settlements

completely unviable for the vast majority of residents. There is a problem with the safety of the existing road network and the perception of safety by all users in the absence of a segregated cycle route and safe cycle storage at the Haywards Heath and Wivelsfield stations. Moreover, cycling is not available to all potential residents, as children, older residents and those with limited mobility would not be able to travel by cycle even a short distance due to the absence of a safe and convenient route.

4.20. The Transport Assessment suggests that there are several local facilities (including a future school) that are within a short cycle ride from the application site. However, realistically, none of these facilities (with the potential exception of the future school at Hurst Farm) are within a safe and convenient distance to most residents in the development. Most users would end up, given their age, travelling by car with their parents, instead of cycling on their own.

4.21. Cycling in the area would require cyclists to travel on the B2112 road, where there is a significant amount of traffic travelling at high speeds. The evidence on recent road incidents in the last 5 years on the map below illustrates that the route to Haywards Heath town centre has seen, in the last five-year period, a total of 18 slight incidents and 9 serious incidents. The route to Haywards Heath Station adds a total of 22 additional slight incidents and 1 additional serious incident. These routes are therefore not appropriate cycling routes. Importantly, they are not routes that could be perceived as safe by any potential user, therefore deterring people from cycling to Haywards Heath and the nearest railway station.

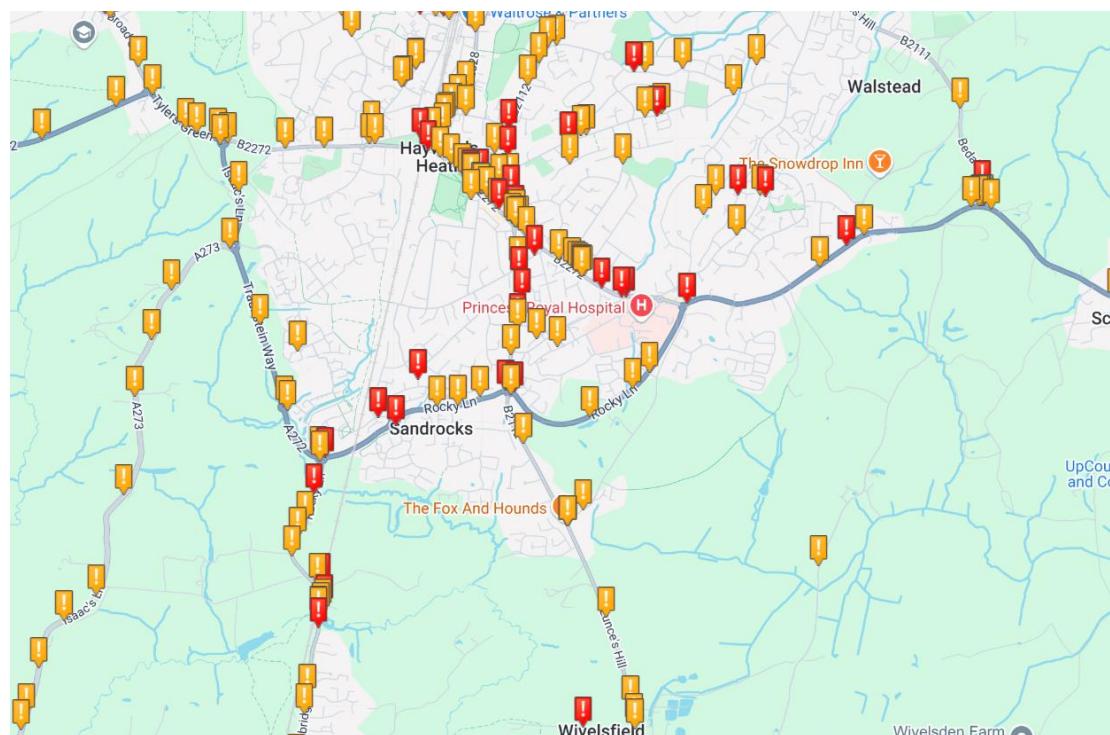


Figure 8: Map showing traffic incidents in the last 5 years. Red: serious incident. Yellow: slight incident. Source: Crashmap.co.uk

Rail

4.22. Whilst the submitted Transport Statement highlights the transport benefits of the Brighton Main Line available at Haywards Heath and Wivelsfield Stations, the reality is that accessing these stations would not likely be done sustainably, either walking or cycling or by bus. Therefore, there is a strong argument to say that whilst rail services may be available within the wider area, travelling to these stations would be by car, as the most convenient way to travel from the site.

4.23. Walking and cycling are not feasible options to travel to the stations, as discussed earlier. Travelling by bus, whilst it may appear a relatively straightforward solution, it is not. The reason for this is the lack of frequent and reliable bus services from the site to the train stations and vice versa. There is simply no direct bus service from the nearest bus stop to Wivelsfield Station, and the services available to Haywards Heath Station (166, 271/272) are not sufficiently frequent and reliable, especially during weekends, to enable modal transport (bus + rail) and move mobility behaviours away from the car.

Bus

4.24. The site is in a poorly accessible location, and public transport services are not reliable for daily tasks or multimodal travel, especially when driving seems the logical and most convenient option. The bus service does not provide good services and facilities in Lewes District, and whilst connections to the town centre in Haywards Heath are available, they are not sufficiently frequent and reliable.

4.25. The proposed development will not contribute towards public transport service improvements, and it relies on the existing insufficient service. The table below, which is an extract from the submitted Transport Assessment, confirms that the site is not served by public transport on Sundays. Moreover, services on Saturdays are very limited and thus are not reliable or efficient for regular weekend travel, either for work or leisure. Finally, and very importantly, weekly services are also limited and insufficient, especially outside term periods. The most frequent service runs every two hours, which is not an acceptable service should future residents wish to rely on public transport for their daily activities.

Service	Operator	Route	Daytime Frequency	
			Monday - Saturday	Sunday
149	Seaford & District	Scaynes Hill – Haywards Heath – Lindfield – Wivelsfield – Chailey School	<u>Mon – Fri</u> 1 service daily at 0810 (Term Time Only) <u>Saturday</u> No Service	No Service
166	Compass Travel	Lewes – Plumpton – Wivelsfield – Haywards Heath	<u>Mon – Fri</u> 5 services daily at 0803, 1002, 1249, 1459, and 1741 <u>Saturday</u> 4 services daily at 1002, 1249, 1459, and 1737	No Service
271 / 272	Metrobus	Crawley – Brighton (Royal Sussex County Hospital)	<u>Mon – Fri</u> Service every 2 hours between 0725 and 2208 <u>Saturday</u> Service at 0701, then every 2 hours between 1145 and 1745	No Service

Figure 9: Table showing the existing bus service available at the bus stop Fox & Hounds on the B2112 road.

4.26. As shown above, the existing bus service available from the application site (within a reasonable and inclusive walking distance of less than 10 minutes) is limited, and it would not constitute a reliable and sufficient service to provide a reasonable alternative to car use.

Conclusion

4.27. For the above reasons, WPC considers that the proposed development is not located in a sustainable and accessible location, and that the sustainable transport options have not been prioritised in the application, as required in the NPPF (paragraph 115). Notwithstanding the location of the site on the edge of Haywards Heath and its town centre services, future residents would have to travel significant distances, likely in Lewes District, as Wivelsfield Parish residents may not be able to access key services, such as GP, in Haywards Heath.

4.28. Not all modes of transport are given sufficient consideration in the application, especially when they could be used by people with less mobility and all users in general. The application does not contribute to sustainable transport, and existing services are limited and insufficient to facilitate future residents using the bus instead of the car for travelling. Considering the walking and cycling distances to key services and facilities, and the lack of sufficient and safe active travel infrastructure and permeability with Haywards Heath, the future community would be isolated and only connected by car. The development fails to maximise opportunities to connect by walking and cycling to the settlement and improve public transport use.

4.29. Transport policy DP21 of the MSDP requires schemes to be sustainably located, minimising the need for travel, facilitating and promoting alternatives to car use and the provision of safe and convenient routes for walking, cycling and public transport. Furthermore, this policy and any development should comply with the overarching MSDP objectives:

- Strategic Objective 5: *"To ensure that development is accompanied by the necessary infrastructure in the right place at the right time that supports development and sustainable communities. This includes the provision of efficient and sustainable transport networks."*
- Strategic Objective 15: *"To create places that encourage a healthy and enjoyable lifestyle by the provision of first class cultural and sporting facilities, informal leisure space and the opportunity to walk, cycle or ride to common destinations."*

4.30. Core Policy 13 of the JCS states that *"the local planning authority will promote and support development that encourages travel by walking, cycling and public transport, and reduces the proportion of journeys made by car, in order to help achieve a rebalancing of transport in favour of sustainable modes by: a) Ensuring that new development is located in sustainable locations with good access to schools, shops, jobs and other key services by walking, cycling and public transport in order to reduce the need to travel by car".*

4.31. It is clear, in consideration of the issues raised with sustainability and accessibility in this section, that the proposed development fails to comply with Policy DP21 of the MSDP and its strategic objectives as well as with Core Policy 13 of the JCS and sections 2 and 9 of the NPPF.

Access design

4.32. Policy DP21 (Transport) of the MSDP requires a transport network that feels, and is, safer and healthier to use. It also requires development to be located where it minimises the need to travel. Importantly, it also requires fully exploring and taking appropriate opportunities to facilitate and promote increased use of alternative means of transport to the private car, which includes the provision of, and access to, safe and convenient routes for walking, cycling and public transport.

4.33. In light of the above policy requirements, we are of the view that the proposal has not sufficiently explored or adopted all appropriate options in terms of layout design and access (as well as development contributions) to facilitate safe and convenient active travel and public transport.

4.34. One of the main concerns is that the site, which is located far from the town centre, would include the development of a community / commercial centre and 130 new dwellings in an area with very limited public transport and active travel opportunities, due to its location, as previously discussed. But the proposal would also lead to new dwellings and many residents located deep into the site, over 400 metres to the north-east from the single access to the site. Whilst the Applicant

claims that the site is adjacent to the settlement, the site is completely isolated for walkers and cyclists from the surrounding built-up areas and the wider settlement. This is due to its location on the edge of the settlement, its significant depth towards the east and the absence of multiple access points that would connect the site with surrounding areas, especially those to the north. For a significant proportion of residents living distant from the single access point (B2112 road), walking and cycling would add additional effort and time that would only contribute to the perception of the isolation of the site and thus, driving as the only convenient means to travel. In that regard, the site's location, distribution of development, access and layout design do not take all opportunities to facilitate and promote active travel and public transport, but they only cement a car-oriented community.

4.35. We are also concerned that the proposed cycle access into the site is not going to contribute to the safe and efficient use of the road and footway network. Furthermore, it would not maximise opportunities for active travel. The main concern is that cyclists are expected to travel on the B2112 road and join the proposed 3-metre-wide footway/cycle track, for having to join the site's internal road network later. No solution includes a segregated cycle lane/track, but only a short section that would be shared with pedestrians and would have the pressure of serving all cyclists and pedestrians travelling in and out of the site, as it is the only access point proposed for 130 dwellings and a community/commercial building.

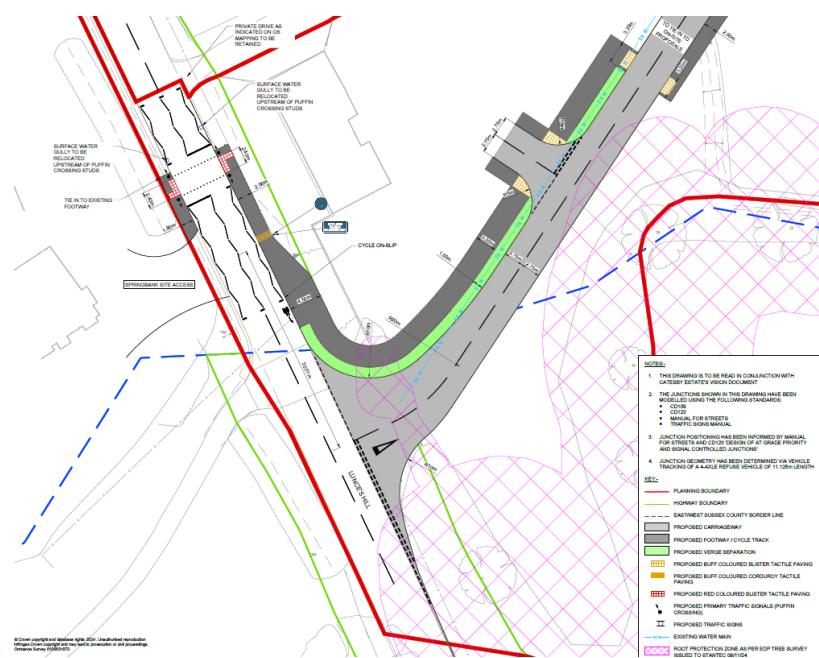


Figure 10: Plan showing the access point to the B2112 (Lunce's Hill). Source: Transport Assessment.

4.36. The described access proposals for pedestrians and cyclists are insufficient insofar as they do not deliver a convenient access solution for all users. Moreover, the cycle arrangement would also increase the feeling of unsafe access for many potential users (pedestrians, wheelers and cyclists). It is also important to highlight that the proposed arrangement may lead some cyclists to use the bell mouth

vehicular access instead, to avoid the effort of diverting twice (from road to footway and from footway to road again) and to avoid any conflict with pedestrians in what it is a narrow and inconveniently shared footway. By cyclists using the vehicular access instead of the designed cycleway (footway), they would be exposed to higher safety risks. In that regard, the increased safety concerns and the potential of unsafe access for cyclists and pedestrians would be a problem with this application which the access and layout design have led to. A segregated cycle and pedestrian network that connects key areas of the site with key destinations within the settlement would ensure that cycling and walking are safe and perceived as safe ways of travelling to and from the site. In the absence of adequate access for all users, not just cars, the proposal fails to comply with Policy DP21 (Transport) of the MSDP.

4.37. WPC is also concerned with the adverse impacts that the proposed access design would cause on landscape character, the historic rural road (Lunce's Hill) and the setting of the nearby listed buildings. We discuss these matters later in the report.

Residential Travel Plan

4.38. The Residential Travel Plan (RTP) submitted with the application states that it aims to:

- Reduce reliance on car use.
- Ensure awareness of sustainable travel options and their benefits
- Maximise safe access to sustainable travel options.
- Build upon good urban design principles that maximise permeability.
- Management and coordination: monitor and review.
- Reduce adverse effects of transportation on environmental health.

4.39. Whilst the above objectives are acceptable, we are missing the objective of reducing the need to travel overall, and the facilitation of active travel, as well as the improvement to the infrastructure and service available. The above outlined high-level principles are not realistic, and they have been prepared without an understanding of the implications of this location and the development proposed. For instance, it aims to reduce car use, but the location and infrastructure available only facilitate car use, not other transport modes. We are also concerned that the RTP suggests good urban design principles, including maximising permeability, but the single access to the site and the internal layout are already defined, impeding any permeability at all.

4.40. Notwithstanding the aspirations above, the project's sustainability and transport behaviours will be determined primarily by its location and the services, facilities, employment and public transport available in the vicinity. As public transport is not reliable for daily activities due to its limited frequency and

insufficient weekend service, such as commuting to work or higher-level studies, the only sustainable options available are walking and cycling. However, these would only provide access for some people (routes not safe or not perceived safe by all), during certain periods (weather and light dependent), and rely on the services, employment, facilities and overall, the destinations available within a walking and cycling distance.

4.41. Considering the above, it is concerning that the RTP proposes high-level aims and a vision that are both unrealistic and disconnected from the site and its location. It also proposes measures such as travel information packs, 'walk/cycle to work' week participation, newsletters, offering high-visibility clothing to pupils, etc. It also includes a Travel Plan Coordinator with empty management tasks and responsibilities, mainly consisting of informing, collecting data and facilitating contacts, but there are no actions that would materially alter people's behaviour from driving cars to cycling, walking or using public transport because the relevant infrastructure and services are not available in this location.

4.42. Another of the key measures in the RTP is the provision of taster public transport tickets. Notwithstanding this, public transport research has robustly demonstrated that, in most cases, the price of public transport is not an impediment to its regular use. Instead, the lack of a frequent and reliable service is what deters people from using public transport. In this regard, this measure is not a useful tool or incentive for future residents to switch from car use to public transport.

4.43. Several measures are non-committal and suggestive only, significantly relying on sharing information on the existing public transport services. It is information that would not normally change travel behaviours in places where car travel will always be the most convenient and safe option for all. Other measures, which are not enforceable and are suggestive only, such as car sharing, encouraging home working, vouchers for supermarket deliveries, etc., are circumstantial and ineffective for modal shift.

4.44. For the reasons explained above, WPC considers that the RTP is empty of actual material measures to increase public transport use and active travel and will be ineffective in making residents switch from car use to other, more sustainable modes. The main obstacle to this is the location and nature of the development in such an unsustainable and inaccessible location.

Conclusion

4.45. Overall, the development is oriented towards individual car use, through its location and its layout design, which punishes active travellers and people with reduced mobility instead. It is WPC's view that **the proposal is an unsustainable form of development and should not be supported as it fails to meet the Development Plan objectives, Policy DP21 of the MSDP and Core Policy 13 of the**

JCS and would not constitute sustainable development, also not complying with chapters 2 and 9 of the NPPF (2024).

5. Housing

- 5.1. Policy DP31 of the MSDP requires that all residential developments providing 11 or more dwellings must deliver at least 30% on-site affordable housing. The expected tenure mix is typically 75% social or affordable rented housing and 25% intermediate housing, although this may be adjusted based on up-to-date evidence of local need. Affordable housing should be integrated with market housing, delivered on free serviced land, and must comply with national technical standards.
- 5.2. Core Policy 1 of the JCS requires development of this scale to include at least 40% of affordable homes. This policy also requires affordable rented and intermediate housing to be included in the affordable housing mix, stating that the guideline affordable housing tenure should be split as follows: 75% affordable rented and 25% intermediate (shared ownership). Notwithstanding this, the JCS leaves the door open for alternative affordable housing mixes based upon the latest evidence of needs in the site locality.
- 5.3. Core Policy 2 of the JCS relates to housing mix and type: *"In order to deliver sustainable, mixed and balanced communities, the local planning authority will expect housing developments (both market and affordable) to: a) Provide a range of dwelling types and sizes to meet the identified local need, based on the best available evidence. This need will generally include 1 and 2 bedroom homes for single person households and couples with no dependants."*
- 5.4. The planning application has been accompanied by a Planning and Affordable Housing Statement. The main points are summarised below:
 - Commitment to provide 40% affordable housing in Lewes District.
 - Commitment to provide 30% affordable housing in Mid Sussex District.
 - The housing mix is proposed to be a reserved matter.
- 5.5. WPC considers that, whilst the proportion of affordable housing proposed is compliant with the minimum 40% required in the JCS and the 30% required by the MSDP, the Applicant is not including any material on the affordable housing tenure and the housing mix, for which the Development Plan sets out clear requirements and therefore these should have been considered by the Applicant in their viability assessments. We request the Applicant to publish their proposed tenure and housing type and size mix, as part of the proposals, so they can be assessed against the Development Plan. We also request the Applicant to explain how the development contributes to affordable housing need, giving consideration to the latest housing need data below and the affordable housing units being built, as part of current developments.

5.6. The most recent housing need data from the Parish provides a useful picture of the local housing need:

- There are housing affordability issues for more than half of local wage earners.
- There is a significantly lower proportion of potentially cheaper smaller (one and two-bedroom) homes in Wivelsfield Parish compared to Lewes District as a whole.
- At least 20 households with local connection need affordable housing due to the inadequacy of their current housing, and their inability to afford to rent or purchase a suitable property on the open market in Wivelsfield Parish.
- The largest proportion of respondents to the latest housing need survey requires a one-bedroom property (70%). This was followed by two bedrooms (20%), three bedrooms (5%), and four bedrooms (5%).
- In terms of location, Wivelsfield Green is the preferred location to live in the Parish, not Haywards Heath.
- The preferred accommodation type is a house, followed by bungalows. There was no interest in flats amongst the respondents of the survey.

5.7. Unfortunately, **the submission does not demonstrate compliance with the market and affordable housing mix of Policy DP31 of the MSDP, Core Policies 1 and 2 of the JCS and the Wivelsfield local housing need.**

6. Landscape and Design

6.1. The D&AS comprises two sections called 'Context Analysis' and 'Opportunities and Constraints', which seem to indicate that evidence has been gathered and later analysed, thus influencing the design process. Nevertheless, these sections are mainly descriptive and do not necessarily contribute towards setting out an unbiased and evidence-based approach to design. The Applicant claims that this development is a landscape-led scheme, however, we discuss below how the design process is flawed, and the result is not landscape-led but a missed opportunity to comply with national and local planning policy and guidance.

6.2. Some of the flaws with the contextual assessment of the D&AS include the irrelevant explanation of the historical growth of the town or the description of randomly selected architectural and urban features of Haywards Heath. It also focuses significantly on statutory designations, such as listed buildings, conservation areas, ecological designations, etc., but there seems to be a lack of understanding of what the contextual analysis is aimed at achieving. In our view, the analysis should help to set out opportunities and constraints as well as guiding principles of what constitutes positive locally characteristic patterns and elements of the landscape that could influence the future design. Whilst the D&AS includes a random mix of observations of the roofs, buildings and materials used in the settlement, it does

not analyse or study the landscape capacity of the site critically, and important elements of urban design that should help define the capacity and layout of the site. For instance, there is no assessment of street hierarchy, topography, orientation of buildings, prevailing winds, ecological corridors, hydrology, etc. When these aspects are presented, they are already as a design solution, as an intervention to a landscape, where the existing conditions and characteristics have not yet been explained (nor understood).

6.3. The above is especially relevant as the WPNP design policy 5, requires development proposals to reflect and enhance the character and scale of surrounding buildings and of distinctive local landscape features. To comply with the above policy, the D&AS should start with a robust and honest understanding of the landscape features and character of the area, not identifying developable areas according to arbitrary decisions, but due to landscape evidence.

6.4. The Landscape Character Assessment for Mid Sussex (November 2005) identifies the key characteristics of the area, some of which are relevant to this planning application: a)

- Significant woodland cover, a substantial portion of it ancient, and a dense network of shaws, hedgerows and hedgerow trees.
- Network of lanes, droveways, tracks and footpaths.
- Dispersed historic settlement pattern, close to Horsham, the principal settlements Cuckfield, Haywards Heath and Lindfield and a few villages and hamlets.
- Some of the historic features are: a) Much of landscape essentially medieval in origin; b) Persistence of ancient woodland; c) Ancient routeways and droves; d) Historic country houses, farmsteads and parkscapes.

6.5. The Landscape Character Assessment for Mid Sussex also identifies key issues (regarding change) such as the visual impact of new urban development, new development on the south edges of Haywards Heath, increasing traffic in the vicinity of Haywards Heath, road improvements, gradual loss of locally distinctive building styles and materials, and importantly, the suburbanisation of the landscape. The report also identifies sensitivities in terms of settlement pattern and how development sits in the rural landscape, and the danger of the cumulative visual impact of buildings and structures, particularly on the south edge of Haywards Heath.

6.6. The Lewes Landscape Character Appraisal (May 2023) sets out a series of landscape management guidelines and development guidelines, which are relevant to this planning application and this area (C3: Ditchling Common Western Low Weald). We have outlined below some of the key guidelines which the development does not comply with:

Development guidelines

- Development should be limited and designed to retain the rural character of the majority of the area, noting that there are several areas with prominent urbanising features
- Protect and retain existing vegetation across the Landscape Character Area, including ancient woodland and on the edge of settlement areas.
- The height, scale, massing and articulation of any new development to be of a similar character to the existing valued context via locally characteristic building forms, high-quality detailing and sympathetic contemporary architecture.
- Any new development should be set within a robust landscape framework as part of a wider blue-green infrastructure strategy

6.7. The landscape character area is also characterised by its undulated landform, but the proposed development makes no reference to topography and the landform of the site as a constraint or opportunity, or a factor to consider in the design of the scheme. The proposed road network runs in many areas against the contours of the site, and we are concerned that this would be contrary to working with the natural contours, which Policy E9 of the HHNP requires to be respected.

6.8. Any development claiming to be landscape-led should analyse the geological and topographical conditions of the site and ensure that the layout design positively responds to the site's topography. This would entail routes following the contours of the site, reducing the engineered negative impact of ground digging and filling, retaining solutions, etc. It would also dictate the location of SuDS features, being located towards the lowest parts of the site and of a size and shape that run along contours and not against them. Furthermore, a layout that positively responds to existing topography would maximise opportunities for soft surface water management solutions and would rely less on engineered solutions.

6.9. Characteristic development in the area largely consists of a dispersed pattern of scattered farmsteads and two-storey dwellings, and in general, the character area's built form is typically dispersed. In the case of this planning application, the pattern of development proposed is based on 2 and 2.5-storey detached dwellings. There is a degree of uniformity applied to the whole site, mainly due to the repetition of building typologies and sizes, as well as the presence of car parking adjacent to homes, either in the form of garages or on-plot parking. Whilst the area is characterised by dispersed farmsteads, the remaining character of a historic farmstead in the area (Cleavewater) would be significantly eroded, as we explain later in this report. Furthermore, the developable areas proposed are not dispersed, but they consist of 10 irregular-shaped perimeter blocks of similar buildings and spaces between. In that regard, the scheme fails to integrate in the design the dispersed nature of the settlement pattern in the area due to the design described above and the quantum of development.

6.10. The Lewes Landscape Character Appraisal also identifies the B2112 as a localised detracting audible and visual feature that decreases the valued tranquillity of the landscape. This scheme, especially due to the heavy reliance on cars, would exacerbate the negative noise and visual impacts.

6.11. The D&AS explains that the layout follows a street hierarchy within the application site, from a larger primary street that meanders from the entrance through the site, to shared space streets (secondary routes), to finally private drives (tertiary routes). However, whilst an internal street hierarchy is welcomed, we are concerned that the primary street would not be at a lower tier in the hierarchy of routes in the area. The B2112 is a locally important B road that crosses the whole settlement and connects to other settlements nearby. However, the proposed new road into the site, which would only serve the 130 homes development and would be less than 400m long, is also designed as a 5.50m wide road, with tarmac, footways and driveways, which exacerbate the width and scale of the road, in the absence of landscape features (such trees and hedgerows) that narrow the route, as the B2112 does. In this regard, we are concerned that the new road network within the site would not be legible as it would not adopt a clear route hierarchy.

6.12. WPC is also concerned that the proposed development would highly suburbanise the rural environment where it sits, fundamentally transforming it to a place that could be anywhere, as it lacks connections to the character of the site. The excessive prominence of vehicle infrastructure and parking within the site would suburbanise this space, and vehicles would dominate the street scene, detracting from rural character, thus being contrary to Policy E9 (HHNP) requirements.

6.13. The application site plays an important role as a gap between settlements: Wivelsfield and Haywards Heath. This gap is protected in the HHNP (Policy E5), which designates the Mid Sussex area of the site as local gap or landscape buffer aimed to maintain the existing landscape character (in this case, highly rural and linked to the historic farmstead of Cleavewater) and to retain and enhance the separate identity of settlements.

6.14. The adopted LPP2 sets out the spatial strategy for the District and highlights the role of the settlement/planning boundaries, giving special relevance to the gaps between settlements: *"The planning boundaries have been carefully considered, taking into account a range of factors including the existing form, pattern and function of settlements, important 'gaps' of countryside between them, the character and setting of individual towns and villages, and environmental considerations, such as the need to conserve designated areas of national landscape, ecological, geological, or historic importance."* WPC is of the view that the application site plays a significant role in retaining the important gap between settlements, which is not only acknowledged in the neighbouring HHNP but in both Development Plans, including LPP2.

6.15. The National Design Guide states that well-designed places, buildings and spaces should have a positive and coherent identity that everyone can identify with, and thus, a coherent pattern of development is essential to ensure that built form contributes to local identity and its context. In this regard, it is unfortunate that the proposed development, regardless of any landscape evidence, includes a significant amount of development, in fields that positively contribute to the rural character of the area and the setting of a listed building. Not only that, but it also seeks to transform it and replace it forever with a suburban cul-de-sac and isolated residential community.

6.16. We are concerned that the Landscape and Visual Impact Assessment (LVIA) assesses the scheme as sensitively designed, with particular focus on the eastern edge of the scheme. The only difference with the eastern part of the scheme is that it is not proposed for residential development, and this is only justified by the need for a buffer between development and ancient woodland. Notwithstanding this, the scheme is considered by WPC to be designed as per any other suburban development in the country. If that's the case, how is the scheme considered by the LVIA to be consistent with the local context?

6.17. WPC is also concerned that the LVIA adopts a mitigation approach instead of a positive landscape-led approach to design, in which, rather than identifying the capacity of the site in landscape terms, it jumps straight into the mitigation of any harm, with particular emphasis on visual impacts. The best and first approach should have been to identify the capacity of the site and opportunities for conservation and enhancement of the site in landscape terms, thus avoiding harm, rather than focusing on mitigating it. The LVIA, therefore, makes the wrong interpretation of what landscape-led design means, which suggests that the location and quantum of development were predetermined, and the landscape evidence had little or no influence in these matters. The LVIA also justifies additional visual impact on the basis that the site is already urbanised, but this is not correct, as the site is highly rural in character, albeit it is in close distance/adjacent to the settlement edge.

6.18. To conclude, we consider that the proposed development would have an adverse impact on landscape character, failing to contribute towards local distinctiveness and sense of place through high-quality design and causing harm to the established settlement pattern and characteristic separation between settlements (and their identity). Consequently, the proposal is contrary to policies E5, E9 and E10 of the HHNP, Policy DP26 of the MSDP, Policy 5 of the WPNP, policies DM25 and DM27 of LPP2 and Core Policies 2 and 10 of the JCS.

7. Heritage

7.1. The site is near a series of listed buildings, including Cleavewater, a Grade II listed building sitting only a few metres away from the application site (approximately 20 metres). Cleavewater's setting is defined, according to the Applicant's Heritage

Statement, by both its location along the road and within its historic farmstead plot, which has not changed significantly. The appreciation of the listed building and its setting is exacerbated by its prominence on the road and the lack of screening (vegetation and buildings).

- 7.2. Policy DP34 of the MSDP requires developments to protect listed buildings and their settings. This policy also requires proposals to demonstrate a thorough understanding of the significance of the listed building and its setting. The HHNP (Policy E9) states that proposals affecting a listed building or its setting should preserve or enhance their special interest and/or distinctive character.
- 7.3. Having outlined above the relevant local planning policy framework and in consideration of section 16 of the National Planning Policy Framework, we assess the impacts of the development on heritage below.

Impacts on listed buildings

- 7.4. The Applicant's Heritage Statement claims that the setting of Cleavewater has been compromised due to the recent construction of a residential development across the road and uses this argument to somewhat reduce the significance of the remaining positive setting on the eastern side of the road. However, in light of this argument, we consider that any further residential development around the listed building, as currently proposed, would detract from the historic setting of Cleavewater, as the main building in a farmstead.
- 7.5. The submitted plans and the Heritage Statement refer to a proposed tree screening between the listed building and the application site, as an important feature to mitigate the impacts of the development on the listed building and its setting. However, as explained above, the listed building is perceived from the road by the public, and it benefits from a strong agricultural setting (fields and subservient agricultural buildings, formerly in agricultural use, such as the barn within the application site) that would vanish completely should the site be developed for housing. WPC is concerned that the principle of development within the setting would be problematic for the conservation and enhancement of the setting of the listed building. But beyond the principle of development, we are also concerned with the proposed physical changes to which the setting would be subject. Roads, footways, car parks, basins, ornamental planting, and above all, houses and garages, would significantly suburbanise the setting of the listed building and would transform it from a strong agricultural landscape contextually linked to the significance of the heritage asset, to a suburban 'anywhere' residential area that would not have a contextual connection to the significance of the building.



Figure 11: Photograph of the existing barn within the application site and Cleavewater (listed building) to its left, with an agricultural backdrop that contributes to the setting of the listed building. Source: Google Maps.

7.6. The D&AS states that “*due to the sensitive nature of the setting of Cleavewater and the residential dwellings on Hurstwood Lane, the western parcel of the proposal requires special treatment. The masterplan proposes a low-density, farmstead arrangement where dwellings are clustered around a carefully landscaped courtyard, with a character that respects the local vernacular.*” Regardless of the D&AS’s aspirations to respect local vernacular, the proposal includes significant development to the north, east and south of the listed Cleavewater and its associated farm buildings. All development proposed is very suburban in character, and whilst the Applicant tries to explain that the cluster of housing to the north-east follows a farmstead arrangement, the result is poor. The ‘farmstead style’ part of the development is simply a group of detached houses adopting a perimeter block approach, as per elsewhere in the application site, but only arranged more tightly than usual. The result is, as per other suburban developments, a cluster of detached homes, with significant space for cars, garages, similar building forms and scales, and a yet unknown architectural style, which would not be able, on its own, to change the issues raised above. Finally, this cluster is detached from the historic farmstead, isolated from the rest of the development, and significantly screened with new planting. If the development was well-designed, landscape-led, and based on contextual evidence, it would not require screening.



Figure 12: Photograph showing the existing field gate and access to the site. Source: Google Maps.

7.7. WPC is also seriously concerned with the negative impact that the proposed works around the existing barn would have on the setting of the barn and the listed building. Whilst the principle of reusing an existing redundant historic building is welcomed, the proposed works would significantly detract from the good agricultural quality of this space. The extensive car park proposed for at least 12 cars, a standard driveway, the wide bell-mouth access to the site, and the wide footway/cycle track along the B112 would suburbanise this space to a degree in which the agricultural character of the site (setting of a listed building) would disappear completely. The above changes are very suburban in character and appearance, and unfortunately, they are not compatible with the conservation and enhancement of the setting of the barn and the listed Cleavewater.

7.8. In light of the above, and that the significance of the setting of Cleavewater derives from the functional historic connection to the surrounding countryside for agricultural purposes, the proposed development would fail to conserve the significance of this setting proportionately. This is due to the fundamental transformation proposed of the existing agricultural rural setting into a highly suburban and non-contextual residential development. Consequently, WPC considers this development proposal contrary to policies DP26 and DP34 of the MSDP and policies E5 and E9 of the HHNP. WPC also considers that the above identified transformation to the setting of the listed building would lead to less than substantial harm to the significance of the heritage assets (Cleavewater) and that the public benefits claimed by the Applicant would be insufficient to outweigh the identified harm, therefore, being contrary to paragraph 215 of the NPPF.

Historic rural roads

7.9. It is also worth highlighting that Lunce's Hill is a historic road that is visible in historic maps and that its route and alignment have remained through time until today, with very few alterations to their character, except for the footway on the western side of the road. The character of Lunce's Hill, especially at the point of the

proposed access to the application site, is defined by being verdant and rural. The road is a historic road, and a historic feature acknowledged in the Landscape Character Assessment for Mid Sussex (2005), as a key characteristic of the local landscape. Importantly, the Landscape Character Assessment for Mid Sussex states in its guidelines that development proposals should minimise the effects of adverse incremental change by seeking new development of high quality that sits well within the landscape and reflects local distinctiveness and that development should seek to protect the tranquil and historic character of rural lanes.

7.10. The existing access to the site is a simple farm gate with no hard surface and retains a strong rural character and verdant feel due to the combination of trees, hedgerows, unmanaged green verges and informal and small-scale field access and gate. Furthermore, the rural access to the fields is contextually sensitive to the existing agricultural barn adjacent to the road (proposed for conversion).



Figure 13: Photograph showing the existing field gate and access to the site and the B2112 to the south. Source: Google Maps.

7.11. The proposed development, particularly the changes to Lunce's Hill because of the new vehicular and cycle/pedestrian accesses, which are standard highway-led and not context-led, would cause an impact to the setting of Cleavewater (Grade II Listed Building), the existing barn and important, the rural character of the road. The area (application site access and its setting) is currently highly rural in character, also contributing to the edge of the settlement and a transition to the countryside. The site is also surrounded by farmland to the north and south, and the B2112 is the only main road in the area. Notwithstanding this, the road is rural in character, being relatively narrow and defined by hedgerows and mature trees on its sides.



Figure 14: Historic map of the area in 1874 showing Lunce's Hill and Clevewater Farm buildings (house and barn). Source: National Library of Scotland.

7.12. WPC would be concerned that the proposed access and break in the verdant character of the road would interrupt the well-defined 'point of transition between the settlement edge and the countryside. We are also concerned that the proposed bell-mouth access is, due to its form, materials and excessive scale, too suburban for this rural location. The negative impact is further exacerbated when reviewing the dimensions of the vehicular access: up to 30 metres at the widest point of the bell-mouth access, to which we should add the 3 metres pavement/cycle track, a 1.50-metre verge and clear visibility splays on each side. All these features, together with the lack of vegetation, likely (not yet confirmed) changes to ground levels, banks, raised access road, etc.), suburban kerbs and signage, tarmac and other materials would detract from the rural character of the historic road, its street scene and the setting of the historic buildings.

7.13. The proposed footway and crossing on Lunce's Hill, whilst beneficial for pedestrians, would lead to a significant negative impact on local landscape character. The proposed footway, varying from 2 to 4.5 metres in width, and its associated kerb would have a suburbanising effect on what currently is a highly rural road with no pavement on the side and a strong verdant character defined by the grass verge on the eastern side and the absence, on the eastern (and most sensitive) side of the road, of highways standard features, such as kerbs, markings, lighting, signage, etc. The absence of the features typical of suburban development, and the existing greenery and informal character of the road contribute to the existing rural character of Lunce's Hill and its street scene, which becomes stronger further south and closer to the site's access, and even stronger as it continues to the

south. Unfortunately, the proposed development would significantly erode this character.

7.14. WPC is of the view that the proposed changes to the road, which would fundamentally change from a rural to a suburban road, would lead to harm to local landscape character. This would indicate that the proposal is contrary to Policy E5 (HHNP) and policies DP12 and DP26 of the MSDP.

8. Green and Blue Infrastructure

Green Infrastructure

8.1. Policy DP37 (MSDP) relates to trees, woodland and hedgerows, and it states that developments should take opportunities to enhance on-site green infrastructure. Policy E5 of the HHNP designates the area as a local green gap that creates a landscape buffer that should support and enhance ecological connectivity and maintain landscape character. It also states that new development would only be permitted where it would not erode the landscape character of the area or its ecology. Policy E6 (HHNP) requires new development to promote green infrastructure (GI) opportunities and establish and enhance links between this and existing GI in the vicinity of the site.

8.2. Core Policy 8 of the JCS relates to green infrastructure, and it requires development to ensure that it maintains and/or manages identified green infrastructure, as well as requiring development to contribute to the green infrastructure network with new green infrastructure and connections to existing green infrastructure. Importantly, it also states that development that undermines the functional integrity of the green infrastructure network should be resisted.

8.3. WPNP policy 5 (Design) also stresses the importance of trees and hedgerows as key landscape features that should be enhanced through the design of new development. Policy 6 of the WPNP relates to green infrastructure and biodiversity, seeking the protection of local assets and green spaces, including ecological networks. It also states that proposals that protect and enhance the Parish landscape's key features will be supported.



Figure 15: Site Features Plan (GRM Phase I Desk Study), which shows existing reed areas of high water retention and areas that are especially marshy/wet.

8.4. Unfortunately, the proposed development reduces the connectivity of existing GI links by widening existing gaps in the hedgerow network and missing opportunities to join up existing GI assets within the site. Furthermore, as can be seen in the Site Features Plan, the site features marshy areas and zones of reed habitat. Notwithstanding the above, the Illustrative Landscape Strategy does not acknowledge these landscape features that contribute to character and green and blue infrastructure. The proposal adopts a tabula rasa approach, failing to assess and integrate in the design the existing green and blue infrastructure features, or to conserve and enhance them.

8.5. The Illustrative Landscape Strategy submitted with the application suggests that the scheme will create strong GI links through the centre of the site, providing continuous connections. However, whilst this is a welcome aspiration, the proposed developable areas and layout design suggest that, regardless of planting details, development, including road infrastructure, will interrupt existing GI links and will not incorporate some key assets (as discussed above). The existing GI network within the site will not only not be enhanced, but will see its connectivity reduced as some gaps in hedgerows will be widened and other areas will be developed. Furthermore, the proposal does not explain what the implications would be to the GI in terms of adjacent SuDS features and other underground services, which have not been accounted for in the design and assessment of impact submitted with the planning application.

8.6. The application has been accompanied by an Arboricultural Impact Assessment (The Environmental Dimension Partnership Ltd), which provides a picture of the trees and hedgerows on site. Whilst an assessment has been provided in terms of impacts of development (housing and infrastructure), the assessment of potential impacts of

the surface water drainage infrastructure (SuDS features, such as basins) is insufficient, especially given the aspirations of the development proposal of retaining most trees and hedgerows. Many of the trees and hedgerows are proposed for retention, and the area of ancient woodland is also proposed to be retained and protected, but the proposed SuDS features would likely lead to implications for root protection areas when close to ancient woodland/trees/hedgerows. They would be affected not just by proposed groundworks but also by changes in hydrology locally and by potential impacts of the extensive underground pipe network.

Ancient Woodland

8.7. Core Policy 10 of the JCS relates to the natural environment and landscape character, and it requires the natural, locally distinctive and heritage landscape qualities and characteristics of the district, - including hedgerows and ancient woodland, amongst others – to be maintained and, where possible, enhanced. Policy DP37 (MSDP) states that development should be positioned as far as possible from ancient woodland, with a minimum buffer of 15 metres maintained between ancient woodland and the development boundary.

8.8. Whilst some buffers have been designed into the layout (see open space between residential development on the eastern side of the site and the ancient woodland), we consider that a landscape-led design of the scheme would have avoided development at all within the eastern parcels/fields. The development's location near ancient woodland is concerning as, regardless of the proposed distance between developable areas and the proposed planting as a buffer to the ancient woodland, there are no obstacles to impede access and activity affecting the woodland. We are concerned that the proposed development will increase the pressure of human and pet activity on one of the most valued habitats in the area, and this pressure would happen regardless of the buffer from the woodland to the new buildings. This is especially relevant as the scheme proposes recreational footpaths within the open space, close to the edge of the ancient woodland.

8.9. The proposed mitigation comprises the provision of a buffer or distance between development and ancient woodland, but that's all the mitigation proposed. It is unclear if there would be some degree of planting to create protection between the development and the woodland, but, regardless of this, there is no measure preventing or discouraging access to the ancient woodland. Should planting be the only solution, we would also be concerned, as planting changes with time and, in the absence of appropriate management, informal routes could be created in the future in the absence of a more definitive solution. Finally, it is also concerning that pets would have free and permeable access into the woodland, and they could lead to negative impacts on the habitat value of the ancient woodland, which needs to be assessed.

8.10. Considering the above, WPC is concerned that the proposed development is not sufficiently landscape-led and that it does not reflect and enhance the character

and scale of the distinctive landscape features that comprise the green and blue infrastructure network within the site. It also fails to enhance existing ecological networks, especially considering that it consists of a residential development within an area designated as a green corridor in the Development Plan. There are also adverse impacts on the existing tree and hedgerow network that have not yet been assessed, and indirect impacts on ancient woodland that cannot be avoided, regardless of the proposed open space buffer between the woodland and the residential development.

8.11. Consequently, the development conflicts with Core Policies 8 and 10 of the JCS, Policy DP12 and DP37 (MSDP), policies DM24 and DM27 of the LPP2, policy E6 (HHNP), and WPNP policies 5 and 6.

Blue Infrastructure and SuDS

8.12. This planning application is also unclear on what the strategy is concerning blue infrastructure (BI). The Planning Statement submitted with the application states that “the indicative layout demonstrates how a sense of place can be created through a landscape-led development scheme which sets aside a large proportion of the site (over 4 hectares / approximately 45%) for green and blue infrastructure and public amenity areas.” Notwithstanding the above, there is no meaningful reference to blue infrastructure in the application

8.13. Existing ditches along the south boundary and north-south direction (photograph 11 of the submitted Phase 1 Ground Desk Study) and as shown in the Phase 1 Habitat Map have not been sufficiently considered in the layout design process. These are not incorporated in the design, and opportunities have been missed to restore them and enhance their contribution to the site’s landscape function and character. In that regard, the scheme is not landscape-led as it has not taken the local opportunities available to enhance the landscape and contribute to meeting BI and GI policy requirements in a locally characteristic manner, so it contributes to the sense of place. Unfortunately, the removal or disregard of existing ditches on site and the replacement of these water features with disproportionately large and standard engineered basins is not an approach that makes the design contribute to a sense of place, but the opposite.



Figure 16: Phase 1 Habitat Plan submitted with the planning application. A narrow light blue dashed line shows a north-south dry ditch. No ditch along the south boundary is shown.

8.14. The Illustrative Landscape Strategy also states that “*SuDS basins and strategy designed to incorporate 'green/blue' features throughout the development. These basins will not only protect from future hydrological issues, but will provide attractive, multi-functional green spaces for the future occupants to benefit from. Peripheral basins will also provide a good opportunity to integrate the development into the adjacent landscape.*” Notwithstanding the above, we are concerned that the suggested multifunctionality of the proposed basins is not realistic. Whilst basins may provide water quantity and water quality management, it is not demonstrated that the proposed basins will contribute to landscape amenity and biodiversity.

8.15. The existing watercourse and ditches would see significant alteration due to development on each side of the watercourse and also through culverting of the watercourse where it is interrupted by road infrastructure. We have identified a single culvert proposed of approximately 60 metres in length, where the main road into the site (see no.5 of the Illustrative Landscape Strategy) would entail culverting the watercourse, which would have negative impacts in terms of landscape character (loss of distinctive ditches), amenity value and biodiversity value.

Water and flood risk

8.16. The proposed basins are of a size and form that do not respond to local context, clearly not responding to contours, as they would be of a different shape

and size otherwise. The positive precedent in the area is ditches and watercourses along field boundaries, but these are proposed for culverting at the point where the watercourse crosses the proposed road. The proposed attenuation basins are of an excessive size to reflect any local positive precedent. These will fail to contribute to a sense of place, contrary to policy requirements in terms of design and landscape. Whether they contribute to biodiversity will also depend on final design details.

8.17. We are also concerned with the proposed surface water drainage strategy, as the submitted evidence suggests that infiltration is likely unviable due to ground conditions. Therefore, the drainage strategy relies on storing surface water in basins before discharging it into the watercourse. Unfortunately, this is not the most sustainable option, which should incorporate ways to capture rainwater at source (roofs and other surfaces), rather than just capturing water in basins.



Figure 17: Plan extract from the Design and Access Statement showing developable areas and basins (attenuation areas).

8.18. The conceptual surface water drainage design has not been designed considering local character, including existing topography (contours). The application should consider designing sustainable drainage systems (SuDS) that positively respond to the local character (not 'anywhere' development basins for attenuation) that contribute to placemaking and maximise opportunities for amenity and biodiversity, not only for water storage.

8.19. We are also concerned that the only vehicular and pedestrian access to the south and southeast residential area is in an area that is within a high-risk area in terms of the likelihood of flooding from surface water. This could lead to safety problems should an emergency arise, and the only access point was flooded. The surface water flood risks of this location can be seen in the map extract below.

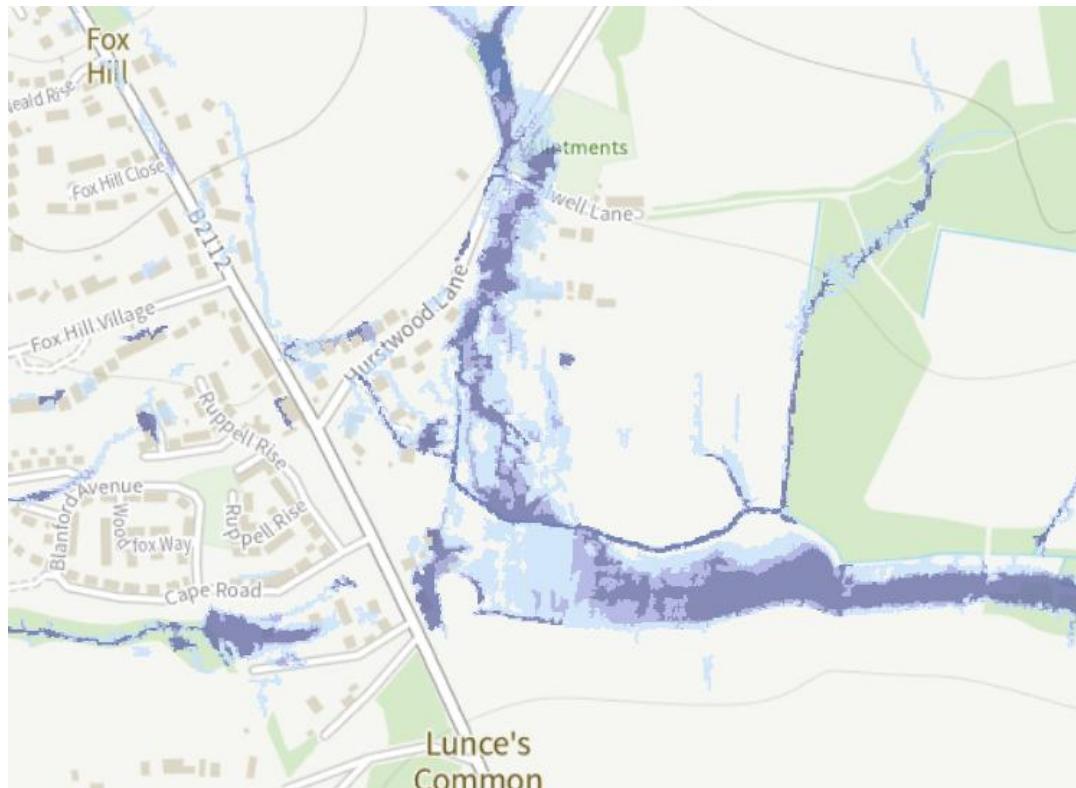


Figure 18: Yearly chance of surface water flooding between 2040 and 2060. Dark blue: high chance. Medium blue: medium chance. Light blue: low chance.

8.20. Considering the above, the proposed development would conflict with policies 5 and 6 of the WPNP, and Core Policy 12 of the JCS.

9. Community Engagement & Consultation

- 9.1. The consultation carried out by Catesby Estates and Rurban Estates in support of their proposed development demonstrates several significant deficiencies, particularly in its failure to properly engage the most affected stakeholders, namely, the residents of Wivelsfield Parish and their elected representatives (Wivelsfield Parish Council).
- 9.2. Engaging with the local community is very much supported and encouraged in the planning system and by WPC, in line with the NPPF, which states that effective engagement between applicants, communities, local planning authorities and other interests throughout the process is essential for achieving high-quality buildings and places.
- 9.3. WPC is surprised by the lack of sufficient and effective engagement with the local community in the design process. NPPF paragraph 134 states that regardless of who prepares design guides and codes, these should be based on effective community engagement. The engagement for design codes and guides should also be applicable in this case, where the proposal includes a masterplan and framework for the design of a large development.

9.4. Moreover, paragraph 137 of the NPPF states the following:

"Design quality should be considered throughout the evolution and assessment of individual proposals. Early discussion between applicants, the local planning authority and local community about the design and style of emerging schemes is important for clarifying expectations and reconciling local and commercial interests. Applicants should, where applicable, provide sufficient information to demonstrate how their proposals will meet the design expectations set out in local and national policy, and should work closely with those affected by their proposals to evolve designs that take account of the views of the community. Applications that can demonstrate early, proactive and effective engagement with the community should be looked on more favourably than those that cannot."

9.5. The geographical focus of the consultation detailed in the Statement of Community Involvement was misaligned with the actual location of the development. Although the majority of the proposed housing site falls within Wivelsfield Parish, the consultation effort was overwhelmingly directed towards Haywards Heath residents. Only 301 leaflets were distributed, and these appear to have mostly reached households in Haywards Heath. As a result, many Wivelsfield residents, who will bear the burden of the development's impacts, were not adequately informed or invited to participate. This is a critical oversight that calls into question the inclusiveness and fairness of the consultation process.

9.6. In addition to poor targeting, the engagement mechanisms themselves were largely superficial and passive. The Applicant relied heavily on digital outreach, including Facebook advertisements and a consultation website, rather than actively engaging the community through public meetings, workshops, or direct dialogue with local groups. The limited response rate: a mere 11 individual submissions and 8 online surveys, strongly suggests that the methods employed failed to reach the wider public. Moreover, there is no evidence in the report of any in-person engagement in Wivelsfield Parish itself, further indicating a lack of genuine outreach to the most directly impacted population.

9.7. The structure and framing of the consultation survey also raise serious concerns for WPC. Rather than asking residents whether they support the principle of development on this site, the survey offered only questions about specific features of the proposal, such as housing types, landscape design, and possible uses for a converted barn. This suggests a pre-determined outcome and implies that opposition to the development was not a valid or welcomed position within the consultation framework. Such framing undermines the integrity of the engagement and can create the impression that the process was merely a box-ticking exercise rather than a genuine attempt to gather a range of community views.

9.8. WPC also considers that there was an evident failure to engage meaningfully with the Wivelsfield Parish Council. While WPC was notified of the consultation, there is no record of a meeting being offered or held, nor any follow-up communication or

tailored engagement. This is particularly troubling given that WPC represents the local electorate in the area where most of the housing would be built.

9.9. Another critical shortcoming lies in the treatment of infrastructure concerns, which were repeatedly raised by the small number of residents who did respond. These included long-standing issues with access to healthcare services (such as GPs and dentists), pressure on local schools, insufficient pedestrian and cycling infrastructure, and concerns about the safety of local roads, especially Lunce's Hill and Fox Hill. Many respondents expressed frustration that no new GP surgeries, schools, or community facilities were proposed as part of the development, despite the significant increase in local population it would generate. The Applicant's response, which references generic future S106 and Community Infrastructure Levy contributions, lacks specificity and does not address the urgent and localised nature of these infrastructure deficits. Furthermore, as evidenced in this planning application, there is no commitment by the Applicant to improve the road and active travel infrastructure.

9.10. Finally, the consultation's heavy reliance on online platforms raises questions about its inclusivity. The consultation website recorded an average visit duration of just over one minute, suggesting limited engagement with the content. There is no indication that alternative methods were employed to reach residents who may be digitally excluded, such as older individuals or those without reliable internet access. This undermines claims of a comprehensive and inclusive community engagement effort.

9.11. WPC considers that the above demonstrates a pattern of narrowly framed consultation, limited outreach, and exclusion of key voices, particularly those in Wivelsfield Parish. These deficiencies not only reduce the credibility of the engagement process but also risk eroding trust between the community and the Applicant. The process appears to have been designed more to fulfil minimal statutory obligations than to genuinely inform, listen to, and respond to the views of those who would be most affected by the proposed development.

10. Conclusion

10.1. WPC strongly objects to the proposed development at Land East of Lunce's Hill. The proposal fundamentally deviates from the Development Plan policies of both Lewes and Mid Sussex Development Plan, undermining the principles of planned growth and sustainable development.

10.2. The proposed development is located entirely within the countryside, outside any defined settlement boundary, and is not allocated for residential development. This contravenes policies DM1 and DM12 of the LPP2 and the MSDP, which aim to protect the intrinsic character and beauty of the countryside and direct growth to sustainable locations.

10.3. The site is poorly accessible, with limited public transport options and inadequate pedestrian and cycling infrastructure. The development would create a car-dependent community, contrary to the objectives of promoting sustainable transport and reducing the need to travel by car, as outlined in Core Policy 13 of the Lewes Joint Core Strategy (JCS) and Policy DP21 of the MSDP.

10.4. The proposal would result in significant harm to the landscape character, transforming a rural area into a suburban development that fails to reflect the local distinctiveness and settlement pattern. The adverse impacts on the setting of the Grade II listed Cleavewater and the historic rural road, Lunce's Hill, further exacerbate the negative effects on heritage and local character.

10.5. Moreover, the development would lead to habitat fragmentation and increased pressure on the adjacent ancient woodland, compromising biodiversity and ecological connectivity. The proposed green and blue infrastructure measures are insufficient to mitigate these impacts and fail to enhance the existing ecological networks.

10.6. The consultation process carried out by the Applicant was inadequate, failing to engage meaningfully with the local community and WPC. The concerns raised by residents regarding infrastructure deficits, such as healthcare, education, and transport, have not been satisfactorily addressed.

10.7. In assessing the proposal against paragraph 11 of the NPPF, it is clear that the adverse impacts of the development significantly and demonstrably outweigh the benefits. The proposal conflicts with the spatial strategies of both districts' Development Plans and fails to meet the criteria for sustainable development. The identified harms to the countryside, heritage assets, landscape character, and ecological networks are substantial and cannot be mitigated by the modest benefits of affordable housing and community use of the barn. Therefore, the presumption in favour of sustainable development does not apply in this case.

10.8. In conclusion, the proposed development at Land East of Lunce's Hill is unsustainable, poorly planned, and detrimental to the local community and environment. For the reasons explained in our representations, **WPC objects to this planning application** and urges Lewes District Council and Mid Sussex District Council to refuse the planning application.

10.9. We would be pleased to provide any required clarification and to participate in any discussions with LDC and the Applicant.

Appendix 1

New homes built, granted permission or planned during the period of Local Plan Part 1 (JCS).

Developments in Wivelsfield Green:

Planning Ref.	Address	No of New Dwellings
Dwellings already built/approved		
LW/09/1323 (approved Jan 2010)	Land Adj to Coldharbour Farm, Hundred Acre Lane (now Shepherds Close)	14
LW/13/0720	Land Adjoining North Common Road (now Charters Gate Way)	75
LW/15/0621	Gyllyndune, South Road	2
LW/18/0437	Land North of Coldharbour Farmhouse	2
LW/18/0533	Clearview, Nursery Lane	1
LW/19/0628	Unit 1, Home Farm, Slugwash Lane	1
LW/19/0629	Unit 2, Home Farm, Slugwash Lane	1
LW/19/0657	Uplea, Green Road	1
LW/20/0165	Moors Cottage, Slugwash Lane	1
LW/20/0696	Somerset House, Green Road	14
LW/20/0787	2 Green Road	1
	Total additional dwellings already built in Wivelsfield Green	113
Further applications recently approved		
LW/21/0437	Winters Farm, North Common Road	1
LW/21/0988	Former Travis Perkins site	6
LW/21/0754/	Land Opposite South Cottage, South Road	45
LW/23/0288		
LW/21/0729/	Land East of Ditchling Road	96
LW/24/0178		
LW/21/0867	Springfield Industrial Estate	30
LW/22/0091	Unit 3, Home Farm, Slugwash Lane	1
LW/20/0133	Land East of Tillershaw	4
LW/23/0631	Land Adjacent to Moors Cottage, Slugwash Lane	2
	Total dwellings recently approved	185
	Total increase in housing numbers for the settlement of Wivelsfield Green since 2011	298

NB these figures purely relate to the settlement (service village) of Wivelsfield Green, and do not reflect the even more intensive development which has taken place in other parts of the Parish, which account for the bulk of the increase in housing numbers to date from 758 in 2011, to 1237 as at October 2023 (an overall increase of 479 dwellings, which does not take into account the recently approved additional 185 homes shown above).

Developments in the West of the Parish:

Planning Ref.	Address	No of New Dwellings
	Dwellings already built/approved	(Net)
LW/14/0350	Sunnybrae, Valebridge Road (29, but with demolition of Sunnybrae & Medway Gardens)	27
LW/18/0566	Nuggets, Valebridge Road (24 but with 2 demolished to make way)	22
LW/17/0826 LW/16/1040	Land To The Rear Of The Rosery, Valebridge Road (55 but demolition of the Rosery)	54
LW/24/0428	Chideok Valebridge Road	2
LW/07/0732	Land off Theobalds Road (NB this was before the current plan period, so is included just for reference)	72

Developments in the North of the Parish:

Planning Ref.	Address	No of New Dwellings
	Dwellings already built/approved	(Net)
LW/13/0147	Land at Ridgeway	62
LW/15/0060		
LW/16/0057	Land South of Greenhill Way	113

Summary of all developments in the Parish

No. Permissions	No of New Dwellings
26	650