



**LAND WEST OF IMBERHORNE LANE,
EAST GRINSTEAD**

Planning Statement

August 2026

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1 INTRODUCTION

- 1.1.1 This Planning Statement has been prepared by Twenty5 Planning Limited (Twenty5) on behalf of Rangeford East Grinstead Limited (the 'Applicant') in support of a Reserved Matters application submitted to Mid Sussex District Council for a Care Village at Land West of Imberhorne Lane, East Grinstead ("the Site"). The development description is as follows:

"Reserved Matters application for a retirement living scheme (Use Class C2) at Land West of Imberhorne Lane. The Reserved Matters include appearance, landscape, layout and scale, pursuant to outline approval DM/23/2699".

- 1.1.2 Section 70(2) of the Town and Country Planning Act 1990 and Section 38 (6) of the Planning and Compulsory Purchase Act 2004 requires planning applications to be determined in accordance with the Development Plan unless material considerations indicate otherwise. The National Planning Policy Framework (the NPPF) is one such material consideration.
- 1.1.3 The Site benefits from outline planning consent (as part of a hybrid planning permission) under planning permission reference DM/23/2699.
- 1.1.4 This Reserved Matters submission addresses detailed matters of layout/siting, scale, appearance, and landscaping, in general conformity with the parameters approved under the outline consent.
- 1.1.5 The proposal will also respond to relevant planning conditions and reflect ongoing engagement with statutory consultees and the local planning authority.
- 1.1.6 This Planning Statement comprises the following sections:
- Section 2: Site Description and Context
 - Section 3: Planning History
 - Section 4: Pre-Application Engagement
 - Section 5: Reserved Matters Proposals
 - Section 6: Planning Policy
 - Section 7: Design & Technical Policy Assessment
 - Section 8: Planning Balance
 - Section 9: Summary
- 1.1.7 In addition to this Planning Statement, the application submission comprises, and should be read in conjunction with, the following documents and plans:
- Site Location Plan
 - Proposed Site Layout Plan
 - Proposed Floorplans
 - Proposed Elevations
 - Proposed Sections

- Proposed Streetscenes
- Design and Access Statement
- Heritage Statement
- Foul and Surface Water Drainage Strategy
- Biodiversity Net Gain Metric and Assessment
- Arboricultural Impact Assessment and Tree Survey
- Land Contamination Assessment
- External Lighting Strategy
- Energy and Sustainability Statement
- Utilities Statement
- Air Quality Assessment
- Details of Fire Hydrant Positions and Fire Safety Matters
- Transport Statement
- Travel Plan
- Statement of Community Involvement
- Waste and Resources Strategy
- Noise Impact Assessment

1.1.8 Conditions 18 and 20 of the hybrid planning permission (ref: DM/23/2699) require the details of siting, design, appearance and landscaping (the reserved matters) to be submitted to and approved in writing by the Local Planning Authority before development commences. These conditions also require any Reserved Matters application to be submitted in general conformity with the approved parameter plans and the Green Infrastructure Strategy, which together set the framework for the outline element of the permission.

1.1.9 The hybrid planning permission also requires some details reserved by condition to be submitted for approval within any reserved matters application. The table below provides a summary of the relevant condition and the details submitted:

Condition No.	Required Details	Relevant Document
Condition 24: Acoustic Measures	An Acoustic Design Statement must be prepared to support any reserved matters application for residential purposes.	Please see the Environmental Noise Assessment, prepared by SES.

1.1.10 In addition, the following pre-commencement conditions are intrinsically linked to the reserved matters proposals, so details to discharge them have been submitted under separate cover:

Condition No.	Required Details	Relevant Document
Condition 25: Air Quality Mitigation Measures	This condition requires submission of a suite of air quality enhancement measures as part of any reserved matters proposals.	Please see the Air Quality Assessment, prepared by EPS.
Condition 35: Details of Existing/Proposed Site Levels	Details of existing and proposed Site Levels.	Please see the Site Levels Plans, prepared by Stantec.
Condition 36: Proposed Foul and Surface Water Drainage Strategy	Details of the proposed foul and surface water drainage strategies.	Please see the Drainage Strategy Report, prepared by Stantec.
Condition 44: Evidence to demonstrate that built development is within Flood Zone 1.	Confirmation that all built development is located within Flood Zone 1.	Please see the Drainage Strategy Report, prepared by Stantec.

2 SITE DESCRIPTION AND CONTEXT

- 2.1.1 The Site is located within East Grinstead, in the administrative area of Mid Sussex District Council. Extending to approximately 4.6ha, it benefits from close proximity to the range of services and facilities available within East Grinstead.
- 2.1.2 The Site comprises undeveloped grazing land situated to the west of East Grinstead. It falls entirely within the built-up area boundary of the town by virtue of its allocation as Policy SA20 in the Mid Sussex Site Allocations Development Plan Document.
- 2.1.3 The Site is bounded by residential development to the north and east, from which it is separated by established tree belts and Imberhorne Lane. To the south the Site is bound by trees and Worth Way shared use route linking Three Bridges with East Grinstead. To the west is Imberhorne farmstead.
- 2.1.4 There are no designated heritage assets within the Site. The nearest listed buildings are 1-3 Imberhorne Farm Cottages (Grade II*) and Imberhorne Farmhouse (Grade II), located to the north-west and separated from the Site by established vegetation. Gullege (Grade II*) is located further to the west of the Site. The Site does not lie within a conservation area.
- 2.1.5 The Site falls within the 7km Zone of Influence of the Ashdown Forest Special Protection Area (SPA) and Special Area of Conservation (SAC).
- 2.1.6 The Site lies entirely within Flood Zone 1 and is not affected by areas identified as being at risk of surface water flooding.
- 2.1.7 Overall, the Site is well related to the existing built form of East Grinstead and represents a sustainable location for development.

3 PLANNING HISTORY

3.1.1 Hybrid planning permission (ref: DM/23/2699) was granted at Land West of Imberhorne Upper School, East Grinstead, in 2025 for the following elements:

- 1) *Outline planning permission for a mixed use development comprising up to 550 dwellings (Use Class C3), a care village of up to 150 dwellings (Use Class C2), land for a 2 form entry primary school (including early years provision and special needs education provision), mixed use neighbourhood centre, allotments, landscaping and sustainable urban drainage; and*
- 2) *Full planning permission for playing fields, new sports pavilion, and running track associated with Imberhorne Secondary School, a Suitable Alternative Natural Greenspace (SANG) with associated car park, access from Imberhorne Lane, internal road to the SANG, pedestrian/cycle link from Imberhorne Lane and associated landscaping and infrastructure”.*

3.1.2 Since the grant of the hybrid consent, a Reserved Matters application (ref: DM/26/0131) has been submitted for 550 dwellings as approved under the outline permission and is currently pending determination.

3.1.3 Other than the hybrid planning permission (ref: DM/23/2699), there is no material planning history associated with the site.

4 PRE-APPLICATION ENGAGEMENT

4.1.1 In line with national planning policy and best practice, the Applicant has engaged with Mid Sussex District Council, the local community and other key stakeholders in the evolution and refinement of the Proposed Development, prior to submission of this reserved matters application.

4.1.2 An initial pre-application meeting was held on 13 October 2025 with officers. A summary of the feedback received is provided below.

Consultee	Summary of Comments
Case Officer	• Supportive that plans are in broad conformity with the approved parameter plans. • Accepts that there will be a level of impact on heritage assets to the west falling into 'Less than substantial'. • Accept that using spoil from the adjacent site to raise land levels and capping can address contamination.
Urban Design Officer	• General approach to car parking welcomed. Preference to omit front parking and employ side parking or rear court parking. For lower density areas parking should be to the side of dwellings and behind building line. • Refinement needed to break down built form massing using varying materials, vertical articulation and façade design. • Clarification needed regarding bungalow private gardens and how privacy will be achieved. • Further refinements needed to the site layout to strengthen vistas, pedestrian links, access to green spaces and refuse and emergency access.
Conservation Officer	• The cumulative impact on nearby heritage assets should be assessed as part of the heritage statement including Gullege manor house. • Alternative solution to raising ground levels to address contamination should be explored to avoid impact on heritage assets. • Further consideration needed to location of the Clubhouse. Preference for this to be located further east within the site. • Consideration needed to density along the western edge. Preference for lower height buildings in the northwest to minimise impact on heritage assets.

4.1.3 A second pre-application meeting was held on 15 December 2025. The Council's response acknowledged that a number of improvements had been made since the initial pre-application submission, including enhancements to the site layout, a reduction in potential impacts on the nearby listed buildings, the selection of appropriate materials, and the strengthening of key vistas throughout the development. Whilst further refinements were recommended, officers expressed overall support for the proposed scheme.

- 4.1.4 On 29 April 2026, the Proposed Development was presented to the Mid-Sussex Design Review Panel. The Panel supported the farmstead design concept applied to the proposals, and encouraged the exploration of further height variations within the scheme, and the integration of sustainability measures such as a fabric first construction approach and provision of photovoltaic panels. The Panel concluded with an overall recommendation of support for the Proposed Development, subject to the refinements mentioned above.
- 4.1.5 A Statement of Community Involvement has been prepared which summarises the pre-application and stakeholder engagement undertaken in relation to the proposed development. This has included extensive consultation with local residents including the following events:
- Presentation to East Grinstead Parish Council: 28 April 2026
 - Community Flyer Drop: June 2026
 - Virtual Consultation Event: 12 June – 2 August 2026
 - Community Drop-In Event 1: 23 June 2026
 - Community Drop-In Event 2: 23 July 2026
 - Dedicated website, project email and freephone information line open throughout the engagement period to register comments
- 4.1.6 As well as the wider community engagement, the Applicant maintained an extensive dialogue with residents in Otterbourne Place and Bluebell Close.
- 4.1.7 The proposed scheme has evolved in response to feedback received during the pre-application and stakeholder engagement process, with a number of amendments made to enhance the quality of the development and better respond to the Site's context.
- 4.1.8 The Applicant remains committed to ongoing engagement with stakeholders throughout the planning application process.

5 RESERVED MATTERS PROPOSALS

- 5.1.1 The application seeks reserved matters approval for a care village of 134 dwellings (Use Class C2).
- 5.1.2 A full explanation of the design proposals is provided within the Design and Access Statement prepared by PRP, which should be read in conjunction with this Planning Statement. A brief summary of the key aspects is provided below, in line with the details required by Condition 18 of the hybrid planning permission, namely siting, design, appearance and landscaping.

5.1 RANGEFORD VILLAGES

- 5.1.3 Rangeford Villages is a developer and operator of retirement villages (Integrated Retirement Communities) in England.
- 5.1.4 The Proposed Development comprises an Integrated Retirement Community of 134 dwellings. As described within the Design and Access Statement, an Integrated Retirement Community offers self-contained homes for sale, shared-ownership or rent, with optional levels of care or domiciliary services available for residents, alongside a range of on-site service and amenities, which will be made available for the general public to encourage community cohesion.
- 5.1.5 Rangeford Villages specialise in developing and managing later living communities for the over 60s. Rangeford Villages' mission is to create beautiful places for residents to enjoy later life, in safe, secure and homely surroundings.

5.2 LAYOUT/SITING

- 5.1.6 The Proposed Development comprises a collection of high-quality residential buildings, including a blend of apartment buildings, bungalows and cottages, alongside a Central Facilities Building, designed to accommodate a range of on-site amenities for residents, all set within a landscape-led environment.
- 5.1.7 As detailed within the Design and Access Statement, the proposed Layout has been thoughtfully designed to accommodate a series of character areas, which have been derived from the initial overarching 'farmstead' concept, employed to form a natural and organic progression from the existing farmstead courtyard to the north-west of the site.
- 5.1.8 The four proposed character areas have been designed to both maximise movement through the development to the Central Facility Building, and to respect the setting of the heritage assets to the north-west of the site.

- 5.1.9 The proposed housing mix is as follows. All proposed dwellings have been designed to meet Part M4(2) building regulations standards, while 5% of all properties (7no. in total) have been designed to meet Part M4(3) adaptable standards, in line with Policy DPH36 of the adopted Mid Sussex District Plan.

Accommodation Type	Quantum
2 bedroom bungalow	4
3 bedroom bungalow	6
3 bedroom cottage	6
1 bedroom apartment	21
2 bedroom apartment	70
3 bedroom apartment	27
TOTAL	134

5.3 DESIGN

- 5.1.10 Rangeford Villages take pride in delivering exceptionally-designed retirement living communities. The Proposed Development has been the subject of close consultation with a range of statutory consultees, including the Mid Sussex District Council, East Grinstead Parish Council, the Mid Sussex Design Review Panel and the local community.
- 5.1.11 This collaborative approach, as detailed within the Design and Access Statement and Statement of Community Involvement, has resulted in the interactive evolution of the proposals to deliver a high-quality later living environment which maximises pedestrian permeability and access to communal facilities and green spaces, while assimilating with nearby heritage assets and the receiving landscape.
- 5.1.12 Sustainability is at the heart of the design approach. Energy and carbon reductions will be achieved through a fabric first approach, provision of photovoltaic panels and a combustion-free heating system. Water efficient appliances will be installed, while an EPC 'B' rating will be targeted for all dwellings, alongside a BREEAM 'Very Good' standard for the Central Facilities Building. Electric vehicle charging has also been incorporated into the proposals, commensurate with policy requirements and the profile of the development.

5.4 APPEARANCE

- 5.1.13 The proposed material palette has been carefully curated to align with the local vernacular, as detailed within the Design and Access Statement. Traditional materials, including a variety of brick treatments and bonds, form the elevations to ensure a refined design approach with contemporary detailing.

- 5.1.14 The general appearance of the proposed built forms follows a contemporary approach that is rooted within the local vernacular.

5.5 LANDSCAPING

- 5.1.15 As detailed within the Design and Access Statement, delivering a genuinely landscape-led development formed the guiding principle when formulating the proposed site layout, with green routes identified throughout the site.
- 5.1.16 The proposals are accompanied by a comprehensive and exemplar landscaping strategy, comprising native species designed to assimilate the scheme within a landscape-led environment, while delivering ecological benefits and amenity benefits for residents alike.
- 5.1.17 The carefully curated planting approach, as detailed within the Design and Access Statement, is aligned with the approach taken with other, successful Rangeford Villages developments across the country.

6 PLANNING POLICY

- 6.1.1 Section 38(6) of the Planning Compulsory Act 2004 requires that applications for planning permissions must be determined in accordance with the Development Plan unless material considerations indicate otherwise.
- 6.1.2 This section explores the relevant national and local planning policies applicable to the reserved matters proposals.
- 6.1.3 The Statutory Development Plan, insofar as it relates to the application site and the proposed development comprises the following:
- Mid Sussex District Plan 2014-2031 (2018)
 - Saved policies of the Mid Sussex Local Plan (2004)
 - Mid Sussex Site Allocations DPD (2022)
 - West Sussex Joint Minerals Local Plan (2018)
 - West Sussex Waste Local Plan (2014)
 - East Grinstead Neighbourhood Plan (2016)
- 6.1.4 There are also several other documents which carry weight in the decision-making process. These include:
- National Planning Policy Framework (NPPF) (2026)
 - Supplementary Planning Documents
 - Emerging Mid Sussex District Plan 2021-2038
- 6.1.5 This Section of the Planning Statement lists the relevant adopted and emerging planning policies and material considerations that are relevant to the consideration of the proposed development.

6.1 MID SUSSEX DISTRICT PLAN (2018)

- 6.1.6 The Mid Sussex District Plan was adopted in March 2018 and sets out the overarching strategy for accommodating growth across Mid Sussex to 2031. The key policies considered relevant to the Proposed Development are as follows:
- Policy DP1: Sustainable Economic Development
 - Policy DP4: Housing
 - Policy DP5: Planning to Meet Future Housing Need
 - Policy DP6: Settlement Hierarchy
 - Policy DP17: Ashdown Forest Special Protection Area (SPA) and Special Area of Conservation (SAC)
 - Policy DP20: Securing Infrastructure
 - Policy DP21: Transport
 - Policy DP24: Leisure and Cultural Facilities and Local Services
 - Policy DP25: Community Facilities and Local Services
 - Policy DP26: Character and Design
 - Policy DP27: Dwelling Space Standards
 - Policy DP28: Accessibility
 - Policy DP29: Noise, Air and Light Pollution
 - Policy DP30: Housing Mix

- Policy DP34: Listed Buildings and Other Heirtage Assets
- Policy DP37: Trees, Woodland and Hedgerows
- Policy DP38: Biodiversity
- Policy DP39: Sustainable Design and Construction
- Policy DP41: Flood Risk and Drainage

6.2 MID SUSSEX SITE ALLOCATIONS DPD (2022)

- 6.1.7 Mid Sussex District Council adopted the Site Allocations Development Plan Document (DPD) June 2022. The Site Allocations DPD identifies sufficient land to maintain a five-year housing land supply through to 2031 and allocates land to meet the District's identified employment needs.
- 6.1.8 The Site forms part of allocation SA20, Land West of Imberhorne Upper School, which is allocated for a comprehensive mixed-use development including up to 550 dwellings. The allocation represents a sustainable urban extension to East Grinstead and provides for a range of supporting uses and infrastructure, including a care community, early years provision, public open space and playing fields.
- 6.1.9 Specifically, the site allocation contains provision for the care (Use Class C2) element of the development to comprise a minimum of 142 dwellings. This figure was inserted into the site allocation policy as a Main Modification in November 2021, following Examination in Public (EiP) of the Site Allocations DPD in June 2021.
- 6.1.10 The modification was introduced to provide a quantitative provision for specialist housing for older people within the policy wording, to contribute towards a requirement to provide for at least 665 extra care units (Use Class C2) by 2030, as identified during the Examination process and captured within Policy SA39 (Specialist Accommodation for Older People and Care Homes).
- 6.1.11 The subsequent hybrid planning application to deliver the SA20 site included provision for up to 150 dwellings within the Use Class C2 element, thereby complying with the minimum 142 dwelling figure provided within Policy SA20. The hybrid planning permission does not set a minimum dwelling figure for the Use Class C2 element, only a maximum 150 dwelling limit.
- 6.1.12 It is understood that the minimum 142 dwelling figure was derived through collaboration between the Council and the promoter of the Policy SA20 site as part of the Examination process, with the figure agreed between both parties on 13 July 2021 by way of a Statement of Common Ground (Reference: MSDC-08 Response to AP13 Matter 3.3).
- 6.1.13 It is important to note that there is no published evidence to demonstrate the provenance of the minimum 142 dwelling figure included within Policy SA20.
- 6.1.14 The Proposed Development seeks to deliver a Care Village comprising 134 dwellings (Use Class C2). This represents a marginal departure from the minimum quantity

stated within Policy SA20. An assessment of this departure is captured within the following section of this Planning Statement.

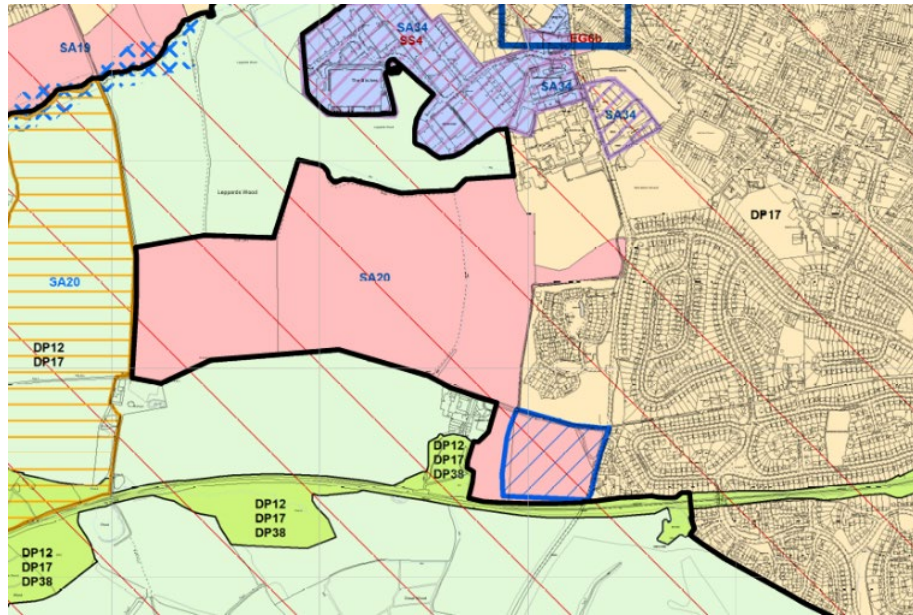


Figure 1: SA20 Allocation identifying the Site for Care Use (Use Class C2)

6.3 EAST GRINSTEAD NEIGHBOURHOOD PLAN (2016)

6.1.15 The East Grinstead Neighbourhood Plan was adopted November 2016. The key policies considered relevant to the Proposed Development are as follows:

- Policy EG3: Promoting Good Design
- Policy EG7: Housing Mix and Density Planning
- Policy SS8: Land South of Birches Industrial Estate and West of Imberhorne Lane
- Policy EG16: Ashdown Forest Special Area of Conservation and Special Protection Area

6.4 RELEVANT SUPPLEMENTARY PLANNING DOCUMENTS

- Design Guide (2020): informs and guides the quality of design for all development, setting out design principles to deliver high quality new development.
- Development Infrastructure and Contributions (2018): details any contributions sought by the District and other providers.
- Development Viability (2018): provides information on the viability assessment process.

6.5 EMERGING MID SUSSEX LOCAL PLAN

6.1.16 The emerging District Plan 2021-2039 sets out an updated vision, spatial strategy, site allocations and planning policies for Mid Sussex and, upon adoption, will supersede the adopted District Plan (2018) and the Site Allocations DPD (2022).

- 6.1.17 Site allocations identified within the adopted District Plan and the Site Allocations DPD (2022), not yet completed, will continue to contribute to the Council's housing land supply and assist in meeting the development needs identified within the emerging Plan. The Regulation 19 iteration of the emerging Local Plan (2023) states that Policy SA20 will be carried into the emerging Local Plan by way of a saved policy.
- 6.1.18 Following Examination in Public held in February and March 2026, a Main Modifications consultation is currently underway, and runs from 27 July to 7 September 2026.
- 6.1.19 Notably, a proposed main modification to Policy DPH4 (Older Person's Housing and Specialist Accommodation) has been proposed to reflect the elevated requirement for housing with care units in the Plan period to 2040, from 857 market units in the Regulation 19 Local Plan to 904 market units.
- 6.1.20 Following the Main Modifications consultation, it is understood that further Examination Hearings may be held in November 2026.
- 6.1.21 While the emerging Local Plan is at an advanced stage, it is considered that limited weight can be applied to it at this stage of the Plan's production, in accordance with Policy DM4 of the NPPF. Notwithstanding, the following emerging policies are of relevance to the Proposed Development:
- DPS1: Climate Change
 - DPS2: Sustainable Design and Construction
 - DPS3: Renewable and Low Carbon Energy Schemes
 - DPS4: Flood Risk and Sustainable Drainage
 - DPS6: Health and Wellbeing
 - DPN1: Biodiversity, Geodiversity and Nature Recovery
 - DPN2: Biodiversity Net Gain
 - DPN3: Green and Blue Infrastructure
 - DPN4: Trees, Woodland and Hedgerows
 - DPN6: Pollution
 - DPN7: Noise Impacts
 - DPN8: Light Impacts and Dark Skies
 - DPN9: Air Quality
 - DPN10: Land Stability and Contaminated Land
 - DPC6: Ashdown Forest SPA and SAC
 - DPB1: Character and Design
 - DPB2: Listed Buildings and Other Heritage Assets
 - DPT1: Placemaking and Connectivity
 - DPT3: Active and Sustainable Travel
 - DPT4: Parking and Electric Vehicle Charging Infrastructure
 - DPH1: Housing
 - DPH3: Sustainable Development – Inside the Built-Up Area

- DPH4: Older Persons Housing and Specialist Accommodation
- DPH11: Dwelling Space Standards
- DPH12: Accessibility

6.6 NATIONAL PLANNING POLICY FRAMEWORK (NPPF) (2026)

6.1.22 The revised NPPF was published in August 2026. It sets out the Government's planning policies for England and explains how these should be applied to development proposals. The NPPF is a material consideration in the determination of planning applications. The following National Development Management Policies within the NPPF are of relevance to the consideration of the Proposed Development:

- Policy DM1: Preparing development proposals
- Policy DM3: Determining development proposals
- Policy DM4: Emerging development plan proposals
- Policy S3: Presumption in favour of sustainable development
- Policy S4: Principle of development within settlements
- Policy CC2: Mitigation of climate change
- Policy CC3: Adaptation to climate change
- Policy HO5: Meeting the needs of different groups
- Policy HO7: Meeting the need for homes
- Policy HO9: Specialist forms of accommodation
- Policy HO13: Build out of residential and strategic sites
- Policy W3: Renewable and low carbon energy development and electricity network infrastructure
- Policy W4: Water infrastructure
- Policy L1: Planning for an effective use of land
- Policy L2: Making effective use of land
- Policy L3: Achieving appropriate densities
- Policy DP3: Key principles for well-designed places
- Policy DP4: The design process
- Policy TR3: Locating development in sustainable locations
- Policy TR4: Street design, access and parking
- Policy TR6: Assessing transport impacts
- Policy HC3: Community facilities and public service infrastructure serving new development
- Policy P2: Ground conditions
- Policy P3: Living conditions and pollution
- Policy F4: Assessing flood risk for decision-making
- Policy F7: Ensuring development is safe from flooding
- Policy F8: Sustainable drainage systems and watercourses
- Policy N2: Improving the natural environment
- Policy N3: Trees in new development
- Policy N4: Protected Landscapes
- Policy N6: Areas of particular importance for biodiversity and geodiversity
- Policy HE4: Securing the conservation of heritage assets
- Policy HE5: Assessing effects on heritage assets
- Policy HE6: Proposals affecting designated heritage assets.

7 DESIGN AND TECHNICAL POLICY ASSESSMENT

7.1 COMPLIANCE WITH HYBRID PLANNING PERMISSION PARAMETERS

- 7.1.1 In accordance with Condition 18 of the hybrid planning permission (ref: DM/23/2699), this planning application comprises the details of siting, design, appearance and landscaping (the reserved matters) of the care (Use Class C2) element of the hybrid planning permission.
- 7.1.2 The hybrid planning permission is governed by a series of parameter plans, which are listed at Condition 20. This condition requires that any reserved matters applications must be submitted in general conformity with the following parameter plans:
- Parameter Plan Land Use and Access 35044 BL-M-01 Rev J
 - Parameter Plan Scale 35044 BL-M-02 Rev I
 - Parameter Plan Green Infrastructure BL-M-08 Rev H
 - Green Infrastructure Strategy 25044 BL-LP-9 Rev A
- 7.1.3 The general conformity of the reserved matters application against these parameter plans is considered in further detail below, and should be read in conjunction with the overlay plans included within Section 10 of the Design and Access Statement:

Parameter Plan Land Use and Access 35044 BL-M-01 Rev J

- 7.1.4 This parameter plan sets out the distribution of the proposed land uses and access arrangements across the site.
- 7.1.5 The Proposed Development aligns with the spatial parameters set by this parameter plan by broadly matching the proposed built form with the extent of the 'Care Community' area identified within the parameter plan.
- 7.1.6 As detailed within the Design and Access Statement, the extent of proposed built form encroaches marginally beyond the extent of the 'Community Care' area, though it has been agreed with Mid-Sussex District Council through pre-application engagement that this is acceptable, and that the proposals remain in general conformity with this parameter.
- 7.1.7 Additionally, the parameter plan identifies a proposed vehicular access point to the north-east of the Care Community site, and the pedestrian access to the south-west. Both of these access points are included within the Proposed Development.
- 7.1.8 Public open space, drainage infrastructure and existing, proposed structural planting and pedestrian routes have also been proposed in accordance with the 'Public Open Space' areas identified within the parameter plan.
- 7.1.9 From this, it is apparent that the Proposed Development is in general conformity with this parameter plan.

Parameter Plan Scale 35044 BL-M-02 Rev I

- 7.1.10 This parameter plan details the height parameters to be deployed across the site. The Proposed Development site is governed by a parameter which states that built form should be up to two-storey and approximately 11m ridge height.
- 7.1.11 While the proposed ridge heights across the Proposed Development are all less than 11m, four of the 17no. buildings proposed across the site comprise 2.5 storeys, thereby introducing a partial deviation from this parameter plan.
- 7.1.12 The introduction of limited 2.5 storey built forms allows for greater variation within the proposed roof forms. This approach was encouraged through engagement with the Mid Sussex Design Review Panel.
- 7.1.13 As noted at Section 4.2 of the Statement of Community Involvement, while the proposed ridge height of Block E was less than 11m, the block was reduced from a 2.5 storey block to 2 storeys, following close consultation with near neighbours.
- 7.1.14 Furthermore, as noted in the Design and Access Statement and Heritage Statement, the proposed buildings to the north-west corner of the site (within the 'Stables' character area) are proposed as lower-rise dwellings comprising 1 to 1.5 storey built forms. This has been proposed following pre-application advice from the Council's Conservation Officer, to assimilate the proposed built form with the setting of the listed buildings beyond.
- 7.1.15 From this, it is apparent that the Proposed Development is in general conformity with this parameter plan.

Parameter Plan Green Infrastructure BL-M-08 Rev H

- 7.1.16 This parameter plan details the areas of the site that should comprise public open space, existing trees and hedgerows and structural planting areas.
- 7.1.17 The Proposed Development aligns with this parameter plan by incorporating the proposed structural planting to the western boundary of the site, alongside the proposed public open space and drainage attenuation. These elements are elaborated within the detailed, high-quality landscaping plans submitted with the reserved matters application.
- 7.1.18 From this, it is apparent that the Proposed Development is in general conformity with this parameter plan.

Green Infrastructure Strategy 25044 BL-LP-9 Rev A

- 7.1.19 This Parameter Plan builds upon BL-M-08 Rev H by providing a green infrastructure strategy for the wider site, comprises a series of key character zones and green and blue infrastructure links.
- 7.1.20 The western element of the Site lies within the 'Woodland Edge' character zone, while two proposed green infrastructure links lie to the north and south of the Site, alongside a blue infrastructure link to the west of the Site.
- 7.1.21 The Proposed Development aligns with this Parameter Plan by accommodating and enhancing the 'Woodland Edge' character area to the west, while the proposed green

and blue infrastructure links have been accommodated within the Proposed Development.

- 7.1.22 From this, it is apparent that the Proposed Development is in general conformity with this parameter plan.

Summary

- 7.1.23 From this analysis, it is apparent that the Proposed Development is in general conformity with the Parameter Plans approved and secured by Condition 20 of the hybrid planning permission (ref: DM/23/2699).

7.2 DESIGN

- 7.2.1 The Design and Access Statement (DAS) sets out the design rationale for the Proposed Development. It outlines the Site context, environmental considerations and technical influences, and explains how these have shaped a coherent and high-quality design approach.
- 7.2.2 The DAS outlines the Vision for the Site, which is to create a high-quality, landscaped Integrated Retirement Community that integrates sensitively with its context. The Proposed Development aims to provide an attractive well-designed environment with strong green infrastructure, guided by the parameter plans approved as part of the hybrid planning permission.
- 7.2.3 The proposed design approach has been informed by Policy DP26 (Character and Design) of the adopted Local Plan, Policy EG3 (Promoting Good Design) of the East Grinstead Neighbourhood Plan, Policy DP3 (Key Principles for Well-Designed Places) of the NPPF, Policy DPB1 (Character and Design) of the emerging Local Plan, and the Mid-Sussex Design Guide Supplementary Planning Document.
- 7.2.4 Policy DP26 requires schemes to be designed to a high standard, incorporating green space, a sense of place and permeability, clearly defined public and private spaces and opportunities to promote community interaction. Policy EG3 adds that new development proposals must be inclusive, and make provision for the safe and easy access for those with mobility impairments.
- 7.2.5 Policy DP3 notes that development proposals should provide focal points to aid legibility while contributing towards climate mitigation measures. Emerging Policy DPB1 of the emerging Local Plan reflects the objectives of Policy DP26, adding that development proposals should be in accordance with the Mid-Sussex Design Guide while avoiding significant harm to the amenities of existing nearby residents and future occupants of new dwellings.
- 7.2.6 The Proposed Development adopts a landscape-first strategy in accordance with Policy DP26, with generous structural planting throughout to assimilate the Site within its context, alongside the integration of sustainable urban drainage features to the west.
- 7.2.7 The Proposed Development has iteratively evolved through engagement with key stakeholders, resulting in a high-quality Integrated Retirement Community that delivers active frontages, clear public/private interfaces, and a legible and permeable street hierarchy, aligning with Policies DP26, EG3, DP3 and emerging Policy DPB1.

The proposed material palette responds to East Grinstead's vernacular, as detailed within the Design and Access Statement.

- 7.2.8 In summary, the design strategy meets the key objectives of national and local policy by delivering a landscape-led, context-sensitive layout. The proposed design approach focuses on high quality placemaking, sustainability, and permeability in line with the NPPF and the adopted and emerging development plan.

7.3 TRANSPORT AND ACCESS

Technical Assessment

- 7.3.2 The Transport Statement (TS) prepared by TPHS has assessed the Site's baseline conditions and the effects of the Proposed Development upon the receiving highway network.
- 7.3.3 The TS includes a bespoke tripmaking exercise for an Integrated Retirement Community, by reviewing a recent traffic survey undertaken at one of Rangeford's existing Integrated Retirement Communities in Corsham, Wiltshire.
- 7.3.4 This exercise ascertained that the implementation of an Integrated Retirement Community at the Site could result in a marginally higher level of peak hour vehicle tripmaking activity than assessed during determination of the hybrid planning application - an additional three (3) vehicle movements during the a.m. peak hour and an additional five (5) vehicle movements during the p.m. peak hour.
- 7.3.5 This marginal increase in vehicle activity to/from the Site via the roundabout junction with Imberhorne Lane is not considered to be material, equating to an additional vehicle movement every 20 minutes during the a.m. peak hour and an additional vehicle movement every 12 minutes during the p.m. peak hour above the activity previously projected. The corresponding impact upon the local road network is no more discernible than the scheme considered as part of the hybrid planning permission.
- 7.3.6 The TS also includes a series of tracking diagrams to demonstrate that refuse and emergency vehicles can successfully navigate the Site, while also confirming that requisite forward visibility splays can be achieved throughout. The pedestrian network throughout the Site has also been reviewed, with the TS outlining the permeability and suitability of the proposed footpath network.
- 7.3.7 The proposed car parking approach (134 spaces) has been based upon the successful operation of Rangeford's similar Integrated Retirement Communities elsewhere in the country.
- 7.3.8 The Proposed Development contains 134 parking spaces, of which 8 would be designed for use for those with mobility issues. 14 parking spaces (c.10% of the total) will be equipped with electric vehicle charging capability from the outset, while all other spaces will be constructed with scope to bring forward electric vehicle charging access if and when required in the future.
- 7.3.9 Parking studies undertaken at the Corsham Integrated Retirement Community demonstrated that approximately half of the Village's residential parking spaces were in use at any one time. When applying this ratio to the Proposed Development, approximately 69 parking spaces are anticipated to be utilised by residents at any

one time. This, combined with a Census review of parking habits for apartments within the local area, demonstrates that the proposed parking quantum is appropriate for the scale of the Proposed Development.

- 7.3.10 Regarding staff parking, it is anticipated that the Proposed Development will accommodate 34 full time staff members, with only half on-site at any one time. To accommodate for overlaps between shifts, and the total number of staff (25no.) that may seek to drive to the Site (before the application of measures within the Travel Plan are considered), the allocation of 19 staff parking spaces is considered appropriate. Rangeford's continued operation and management of the Proposed Development will enable parking demands to be reviewed and adapted as necessary.
- 7.3.11 Regarding visitor parking, 16 visitor vehicles were recorded during the middle of a weekday, when 25 were made available for visitors. A similar ratio has been applied to the Proposed Development, resulting in the allocation of 11 visitor parking spaces.
- 7.3.12 Regarding cycle parking, 5 cycle parking spaces are anticipated to be required to serve the Proposed Development, in accordance with a survey of cycle parking demand at Corsham. Notwithstanding, a series of external covered parking spaces are proposed at each block entrance for flexible use, cumulatively facilitating parking for 9-17 cycles across the Site. This will address both resident, visitor and staff cycle parking provision.
- 7.3.13 The Framework Travel Plan submitted with the reserved matters application builds upon the Draft Travel Plan submitted with the hybrid planning permission (DM/23/2699), and includes bespoke measures to encourage modal shift towards sustainable transport modes in the context of an Integrated Retirement Community.
- 7.3.14 In line with the Draft Travel Plan, the submitted Framework Travel Plan includes a range of measures to reduce the level of car trips to and from the Site by 10%, in line with the WSCC Residential Development Travel Plan guidance. These measures include the provision of information to staff, residents and visitors regarding public transport availability and walking/cycling opportunities. The Travel Plan Coordinator would be the Applicant, who will be responsible for the implementation of the travel planning measures.

Policy Compliance

- 7.3.15 Policy DP21 (Transport) of the adopted Local Plan supports the delivery of sustainable transport and movement solutions. Policies TR3, TR4 and TR6 of the NPPF require development proposals to be located to support sustainable patterns of movement, give priority to walking, cycling and wheeling permeability, and adequately assess the impacts of a development proposal upon the local road network. Policies DPT1 and DPT3 of the emerging Local Plan promote similar principles, while Policy DPT4 seeks to guide parking provision within development proposals.
- 7.3.16 The Proposed Development is anticipated to result in a marginal increase in the vehicular movements assessed during consideration of the hybrid planning application (ref: DM/23/2699). As detailed within the Transport Statement, this marginal increase is not anticipated to result in any discernible impact upon the local road network.

- 7.3.17 The proposed Site Layout has been carefully designed to maximise opportunities for pedestrian permeability, while the Site lies in proximity to a range of services in East Grinstead.
- 7.3.18 The parking provision for the Proposed Development has been proposed in accordance with Rangeford Village's extensive experience of operating similar Integrated Retirement Communities across the country, citing parking surveys undertaken at one of Rangeford's existing Villages in Wiltshire. This bespoke approach is in accordance with West Sussex County Council's latest parking guidance (2020), which advises that parking provision for Use Class C2 residential care homes is considered through a site-specific assessment, based upon specific operational needs and a travel plan.
- 7.3.19 From this, it is apparent that the Proposed Development will not cause severe adverse impacts on the road network (as defined by Policy TR6 of the NPPF), while the proposed parking arrangements are acceptable and in line with the anticipated parking demands for the Proposed Development. The Framework Travel Plan will be adopted and enforced by the Applicant to promote sustainable transport opportunities for residents and staff alike. The Proposed Development is, therefore, in accordance with Policy DP21 of the adopted Local Plan, Policies TR3, TR4 and TR6 of the NPPF and Policies DPT1, DPT3 and DPT4 of the emerging Local Plan.

7.4 HERITAGE

Technical Assessment

- 7.4.2 A Heritage Statement has been prepared by JB Heritage Consulting, and submitted alongside the reserved matters application.
- 7.4.3 Two listed buildings are located in the vicinity of the Proposed Development:
- Imberhorne Farmhouse (National Heritage List for England [NHLE] ref 1277678) listed at Grade II
 - 1-3 Imberhorne Farm Cottages (NHLE ref 1392066) listed at Grade II*.
- 7.4.4 These listed buildings form part of a farmstead group which are generally well concealed in views from the east by the topography and vegetation. It is only the upper parts of the cottages and farmhouse that can be glimpsed from the Site.
- 7.4.5 Notwithstanding this, during consideration of the hybrid planning permission, a degree of less than substantial harm was assessed by the Council's Conservation Officer, as summarised below:
- A degree of mid-high level of less than substantial harm to Imberhorne Farmhouse by virtue of the fundamental change in land character resulting from the proposed development, the introduction of built form in views to and from the farmstead, adjacent PROWs, entrance track and Imberhorne Lane, and introduction of activity within what is a currently tranquil setting.
 - A degree of low-mid level of less than substantial harm to 1-3 Imberhorne Farm Cottages by virtue of the change in character of the wider rural setting to the north and east for the reasons as summarised above.

- A degree of mid-high level of less than substantial harm to Imberhorne Farm Courtyard by virtue of development within its wider setting as summarised above.
- 7.4.6 This less than substantial harm was weighed against the public benefits by the Council during the determination of the hybrid planning application. The Committee Report (Paragraph 12.51) concluded that the public benefits were considered to *“significantly outweigh the less than substantial harm to the setting of the heritage assets”*.
- 7.4.7 Notwithstanding this accepted position, the Proposed Development has incorporated a variety of design measures to minimise any perceived harm upon these heritage assets. Firstly, the Proposed Development deploys an agricultural typology and concept to the Site Layout, with the Site divided into a series of four quadrant character areas, reflective of a rural farmstead. The design approach within the north-western quadrant, known as ‘The Stables’ comprises a series of cottages and bungalows comprising 1-1.5 storeys in height.
- 7.4.8 This low-rise approach has been developed through pre-application engagement with the Conservation Officer to ensure that these buildings remain subservient in scale to the listed buildings even with the requisite raised land levels across the Site, as detailed within the submitted Site Levels Plans, prepared by Stantec.
- 7.4.9 Secondly, the material detailing deployed within the Proposed Development aligns with the local vernacular and traditional building materials. Finally, the Proposed Development accommodates and enhances the structural planting to the western boundary of the Site, as detailed within the Green Infrastructure and Green Infrastructure Strategy Parameter Plans.
- 7.4.10 ‘Gullege’ listed at Grade II* (NHLE ref 1248946) was also determined to experience an impact in the determination of the wider hybrid planning application. This listed building is located to the west of Imberhorne Farm at some distance (over 800m) from the Site. As such, it is considered to be sufficiently distant so as not to experience an impact from the Proposed Development.

Policy Compliance

- 7.4.11 Policy DP34 (Listed Buildings and Other Heritage Assets) requires developments to protect listed buildings and their settings. Policy DPB2 of the emerging Local Plan largely follows the content of Policy DP34.
- 7.4.12 Policies HE4, HE5 and HE6 of the NPPF similarly require development proposals to conserve heritage assets, while any substantial harm to a designated heritage asset must be avoided unless it can be demonstrated that the harm is necessary to achieve substantial public benefits that outweigh the harm.
- 7.4.13 A degree of harm to the two listed buildings to the north-west of the Site has been assessed and accepted as part of the hybrid planning permission. The Proposed Development has accommodated a series of measures to minimise this harm to the lowest possible degree, through implementing subservient, low-rise built forms within proximity to the heritage assets, alongside a sensitive external material treatment and introduction of significant landscaping to the western boundary of the Site.
- 7.4.14 This approach is consistent with Policy DP34 of the Local Plan, Policies HE4-HE6 of the NPPF and Policy DPB2 of the emerging Local Plan.

7.5 NOISE

Technical Assessment

- 7.5.2 The Noise Assessment prepared by SES identifies baseline conditions at the Site. This has informed a number of acoustic recommendations for implementation within the Proposed Development, such as the proposed glazing specifications and the provision of trickle vents to each dwelling.
- 7.5.3 With the implementation of the controls relating to glazing and ventilation, the sound insulation of the external building envelope should be suitable to control external noise ingress, so as to achieve the internal noise levels, as referred to in BS8233:2014.

Policy Compliance

- 7.5.4 Policy DP29 (Noise, Air and Light Pollution) of the adopted Local Plan and Policy DPN7 (Noise Impacts) of the emerging Local Plan require development proposals to minimise the impacts of noise upon health and quality of life. This is reflected within Policy P2 of the NPPF.
- 7.5.5 The submitted Noise Assessment demonstrates that, with the implementation of appropriate acoustic measures, the Proposed Development would not introduce any adverse acoustic impacts for new residents, in accordance with the adopted and emerging policies listed above.

7.6 AIR QUALITY

Technical Assessment

- 7.6.2 The Air Quality Assessment prepared by EPS confirms that the Site is not located within an Air Quality Management Area (AQMA)
- 7.6.3 Baseline monitoring demonstrates that existing air quality is within acceptable limits. During the construction phase, there is potential for dust and particulate matter to be generated, but the assessment concludes that with appropriate mitigation measures including a dust management plan and careful phasing of works, any impacts will be negligible.
- 7.6.4 In the operational phase, traffic generated by the development has been screened against IAQM and EPUK criteria and is not expected to result in a negligible impact upon local air quality. Predicted concentrations of nitrogen dioxide (NO₂) remain well below the relevant air quality objectives at all assessed locations.

Policy Compliance

- 7.6.5 Overall, residual impacts are negligible. This demonstrates compliance with Policy DP29 (Noise, Air and Light Pollution) and DPN9 (Air Quality) of the adopted and emerging Local Plans respectively, as well as the requirements of the NPPF (Policy P3) to prevent unacceptable pollution and sustain compliance with national objectives.

7.7 DRAINAGE STRATEGY

Technical Assessment

- 7.7.2 The Drainage Strategy Report prepared by Stantec confirms that the Site lies within Flood Zone 1, with a very low risk of fluvial flooding, with some isolated areas of low surface water flood risk to the centre of the Site.
- 7.7.3 The proposed surface water drainage strategy has been informed by BRE365 soakage testing undertaken in 2021 to support the hybrid planning application. These tests confirmed that infiltration testing not considered to be a feasible drainage solution for the Site.
- 7.7.4 Therefore, the proposed surface water drainage strategy comprises a gravity-fed below-ground drainage network which conveys surface water to two attenuation basins to the west of the Site. These basins will provide attenuation storage before discharging at a greenfield run-off rate to the existing water course located to the north-west of the Site.
- 7.7.5 Overall, the Drainage Strategy Report concludes that the development can be made safe for its lifetime without increasing flood risk elsewhere, and that SuDS will ensure surface water runoff is appropriately managed.

Policy Compliance

- 7.7.6 Policies DP41 (Flood Risk and Drainage) and DPS4 (Flood Risk and Sustainable Drainage) of the adopted and emerging Local Plans require new development proposals to incorporate sustainable drainage systems, and ensure that development will not increase flood risk both on site and elsewhere. This is reflected in Policies F4, F7 and F8 of the NPPF.
- 7.7.7 The Proposed Development aligns with these policies by proposing a comprehensive surface water drainage strategy, incorporating SUDs features which accord with the identified ground conditions. The SUDs features will serve a landscape function by assisting in creating a soft, landscaped western edge to the Proposed Development.

7.8 BIODIVERSITY NET GAIN

- 7.8.1 A Biodiversity Net Gain Assessment has been prepared by The Ecology Partnership.
- 7.8.2 This report concludes that the Proposed Development could result in a net change of +2.17 area habitat biodiversity units, a negligible 0.03% gain in hedgerow units, and no change in watercourse units.
- 7.8.3 This equates to a +10.88% net gain in habitat units, and no change in hedgerow and watercourse units.
- 7.8.4 While the Proposed Development secures a net gain, the loss of medium distinctiveness habitats (including neutral grassland), the trading rules for this typology are not satisfied. Therefore, a total of 6.24 medium distinctiveness grassland units will be purchased to address the trading rules.
- 7.8.5 While the hybrid planning permission pre-dates the statutory requirement to provide biodiversity net gain under the Environment Act 2021, the hybrid planning permission

includes the Biodiversity Gain Plan conditions, and contains provisions within the Section 106 agreement to require the delivery of +10% biodiversity net gain within the wider Site.

- 7.8.6 The Proposed Development, therefore, results in a partial departure from the provisions of the hybrid planning permission due to the trading rules deficit, which can be resolved through purchase of off-site credits.

7.9 ENERGY AND SUSTAINABILITY

Technical Assessment

- 7.9.2 An Energy and Sustainability Statement has been prepared by CPW, to demonstrate the Proposed Development's compliance with Part L 2021 of the Building Regulations.
- 7.9.3 The proposed energy strategy comprises a decentralised system utilising Exhaust Air Heat Pumps (EAHP) providing heating, cooling, ventilation and domestic hot water. Supplementary heating via electric panel/plinth heaters will also be provided to the kitchen, living and dining areas.
- 7.9.4 The Central Facilities Building will be serviced as a standalone building. Ventilation shall be generated locally via air handling units and MVHR units. Hot water shall be generated locally using electric point of use heaters.
- 7.9.5 A fabric first approach will be applied to construction, while photovoltaic panels are proposed to some bungalows and the Central Facilities Building to maximise renewable energy generation. The proposed dwellings have been designed to achieve an EPC B rating, while the Central Facilities Building has been designed to achieve an EPC A rating and BREEAM 'Very Good' standards.
- 7.9.6 An overheating assessment has also been undertaken, demonstrating that the Proposed Development achieves compliance with TIBSE TM59 standards.

Policy Compliance

- 7.9.7 Policy DP39 (Sustainable Design and Construction) of the adopted Local Plan and Policy DPS2 (Sustainable Design and Construction) requires development proposals to explore opportunities for energy efficiency and renewable energy sources. The Main Modifications to Policy DPS2 proposed by the Planning Inspectorate seeks to amend the policy to support the installation of heat pumps and solar panels. These measures are reflected in Policy CC2 and CC3 of the NPPF.
- 7.9.8 The Proposed Development aligns with these adopted and emerging policies by accommodating a range of measures designed to maximise opportunities to incorporate energy efficiency and renewable energy sources.

7.10 UTILITIES

- 7.10.1 A Utilities Statement has been prepared by CPW, and accompanies the reserved matters application. The Statement details the relationship between the Proposed Development with existing services, diversion works and new connections, in accordance with Policy DPI1 (Infrastructure Provision) of the emerging Local Plan.

7.11 FIRE STRATEGY

- 7.11.1 A Fire Service Access and Hydrant Strategy has been prepared by PB Fire Strategy. The Strategy comprises a review to confirm that fire vehicles can successfully navigate the Proposed Development, and details of the proposed provision of fire hydrants throughout the site.

7.12 GROUND CONDITIONS

Technical Assessment

- 7.12.2 A Ground Investigation Report, prepared by Stantec, accompanies the reserved matters application.
- 7.12.3 The Report captures a range of additional ground investigations undertaken to build upon the suite of investigations undertaken in support of the hybrid planning permission, to provide a detailed review of the ground conditions within the Proposed Development site, to inform its delivery.
- 7.12.4 The ground conditions within the Site comprise the following elements:
- **Topsoil:** to depths of between 0.20m and 0.50m bgl; over
 - **Made Ground:** to depths of between 0.50m and 3.50m bgl, comprising a mixture of domestic refuse, commercial and industrial waste and demolition waste, including plastic, metal, paper, wire, pipes, glass bottles, clothing, partially decomposed wood, animal bones and ash; over
 - **Upper Tunbridge Wells Sand (in the north):** the base of this stratum was not proven. Comprised firm to stiff grey mottled orangish brown and yellowish brown sandy slightly gravelly CLAY, and medium dense brown gravelly clayey fine to coarse sand; over
 - **Grinstead Clay Member (in the south):** the base of this stratum was not proven. Comprised stiff brown mottled red slightly sandy clay, very stiff dark grey slightly sandy clay, firm orangish brown mottled grey slightly sandy slightly gravelly clay, with iron-stained sandstone and mudstone.
- 7.12.5 The Made Ground element contains material associated with the historic landfill resulting from clay extraction in the 1940s/50s. Ground conditions therefore require engineered land formation to achieve suitable development platforms.
- 7.12.6 It is proposed that suitable excavation arisings from the neighbouring housing development will be placed on the Site to provide clean cover to safely encapsulate the former landfill area.
- 7.12.7 The Report includes a range of recommendations to be accommodated within a Remediation Strategy to inform the proposed engineered land formation works, to be approved by the local planning authority prior to first occupation of the Proposed Development, in accordance with Condition 30 of the hybrid planning permission.

Policy Compliance

- 7.12.8 Policy SA20 of the adopted Local Plan requires development proposals at the Site to provide a detailed investigation into possible sources of on-site contamination together with any remedial works that are required, particularly those associated with the historic landfill located around Imberhorne Farm to the south east of the site.
- 7.12.9 Similarly, Policy DNP10 (Land Stability and Contaminated Land) of the emerging Local Plan requires development proposals to undertake investigations to determine the extent of the contaminated land within a site, and propose commensurate remediation measures. This is reflected in Policy L2 of the NPPF.
- 7.12.10 The submitted Ground Investigation Report builds upon the ground investigations undertaken to support the hybrid planning application, to inform the proposed cut and fill approach and management of the historic landfill beneath the Proposed Development site. Further detail regarding remediation of the historic landfill will be provided in an application to discharge Condition 30 of the hybrid planning permission.
- 7.12.11 From this, it is apparent that the Proposed Development is in accordance with Policy SA20 of the adopted Local Plan, Policy DNP10 of the emerging Local Plan, and Policy L2 of the NPPF.

7.13 COMPLIANCE WITH POLICY SA20

- 7.13.1 Following review of the Proposed Development against relevant technical disciplines in this section of the Planning Statement, the below table assesses the Proposed Development against each relevant element of the site allocation (ref: Policy SA20):

POLICY SA20 ELEMENT	COMPLIANCE ASSESSMENT
Objectives	
To deliver a high quality and sustainable extension to East Grinstead, which facilitates the expansion of Imberhorne Upper School, informed by a landscape led masterplan creating a development which is sensitive to the rural setting of the nearby heritage assets, and includes generous green infrastructure corridors to contain the built form. The development shall establish a strong sense of place and include a neighbourhood centre, whilst providing good permeability across the site with attractive pedestrian and cycle routes throughout	The Proposed Development aligns with this objective by incorporating the green infrastructure proposals secured within the approved parameter plans, while sensitively addressing the heritage assets to the north-west of the Site. Pedestrian permeability and walkability is central to the proposed Site Layout, while the proposed delivery of distinct character areas will define a clear sense of place within the Proposed Development.
Urban Design Principles	

Optimise the potential of the site through the masterplan process, whilst establishing a strong sense of place which is sympathetic to the existing local character of East Grinstead and the wider landscape setting.	The Proposed Development has iteratively evolved through pre-application engagement, ensuring that this element of the wider site remains in general conformity with the parameters established as part of the hybrid planning permission.
Development shall provide a pedestrian friendly neighbourhood centre that is centrally positioned and well integrated with the development and in close proximity to the main open space provision	This element relates to the Local Centre to the north of the Proposed Development.
Provide a positive and soft edge to Imberhorne Lane and the countryside with buildings that front on to the tree-lined field boundaries allowing an attractive backdrop to the public realm, avoiding trees overshadowing back gardens	This element relates to the wider development site to the north of the Proposed Development.
Retain and enhance existing established trees and other landscape features and weave them into green infrastructure / open space / movement strategy that encourages pedestrian and cycle use.	The green infrastructure secured within the parameter plans established as part of the hybrid planning permission have been incorporated into the Proposed Development. and form a key part of the proposed Site Layout.
Focus higher density development with 3 to 4 storey frontages in the most accessible part of the site around the neighbourhood centre. Carefully accommodate car parking to ensure it does not dominate the public realm	This element relates to the wider development site to the north of the Proposed Development.
Ensure the site maximises connectivity with the existing settlement and services within East Grinstead and utilises a permeable layout throughout.	Permeability has formed a guiding principle of the proposed Site Layout. The Proposed Development has been designed to link with the road and footpath infrastructure secured as part of the hybrid planning permission.
Undertake a Landscape and Visual Impact Assessment (LVIA) to inform the site layout, capacity and mitigation	The Proposed Development remains in compliance with the conclusions of the LVIA prepared to support the hybrid planning application.

requirements, in order to minimise impact on the wider countryside.	
Retain and substantially enhance existing landscape structure, safeguarding mature trees and landscaping along the boundaries, and within the site and along historic field boundaries incorporating them into the landscape structure and layout of the development to contain the new housing, and limit the impact on the wider landscape.	Existing trees and vegetation have been incorporated into the proposed Site Layout.
Ensure the design and layout of the development works with the natural grain of the landscape following the slope contours of the site, minimising cut and fill.	As detailed within the Ground Investigations Report, an element of cut and fill and land raising is required to address the ground conditions at the Site. The resultant proposed site levels are demonstrated within the submitted Site Levels Plans.
Development proposals shall protect and enhance the character and amenity of the existing PRoW which runs through the site and provide connections through the new development. Protect the character and amenity of the Worth Way which runs adjacent to the southern boundary.	The Proposed Development protects the character and amenity of the Worth Way to the south by retaining and enhancing vegetation to the southern boundary.
Social and Community	
Provide a detailed phasing plan with agreement from the Local Planning Authority in consultation with key stakeholders to secure.	This is addressed through Condition 28 of the hybrid planning permission.
Provision of a minimum of 142 dwellings (Use Class C2) in a dedicated site within the allocation, fronting onto Imberhorne Lane	As detailed within Section 6 of this Planning Statement, the Proposed Development results in a partial departure from this element of Policy SA20 by proposing a marginally smaller quantum of development than anticipated within the policy wording (134 dwellings). As detailed within Section 6, the provenance of the 142 dwelling figure within Policy SA20 is unclear.

	Notwithstanding this, the Proposed Development has been prepared by Rangeford Villages, a renowned and established Use Class C2 operator with extensive experience in developing and managing Integrated Retirement Communities as proposed. This experience and knowledge has resulted in a development quantum that best aligns both with the site's characteristics, and the Applicant's knowledge associated with the successful operation of similar developments across the country. The provision of 134 Use Class C2 dwellings will provide a significant contribution towards the requirement to provide for at least 665 extra care units (Use Class C2) by 2030, as identified during the Examination of the Site Allocations DPD and captured within Policy SA39 (Specialist Accommodation for Older People and Care Homes)
Note: the other elements listed under the Social and Community part of Policy SA20 relate to the wider site, beyond the Proposed Development.	
Historic Environment and Cultural Heritage	
Protect the rural setting of the nearby Grade II* listed Gullege, Grade II listed Imberhorne Farm and Grade II* listed Imberhorne Cottages by masterplanning the layout, design and landscape structure to ensure the development is not dominant in views from these listed buildings.	As detailed within the Heritage Statement submitted with this application, the Proposed Development has been carefully designed in collaboration with the Council's Conservation Officer to ensure the proposed built form is subservient to the heritage assets to the north-west of the Site.
Establish need for Archaeological pre-determination evaluation and appropriate mitigation and undertake a geophysical survey, the results of which will identify appropriate archaeological mitigation.	This is addressed through Condition 33 of the hybrid planning permission.
Biodiversity and Green Infrastructure	

Undertake an holistic approach to Green Infrastructure and corridors, maintaining existing habitat connectivity, incorporating existing retained trees and hedgerows within the site and connect to surrounding landscape	The green infrastructure parameters established as part of the hybrid planning permission have been incorporated into the Proposed Development.
Conserve and enhance areas of wildlife value and ensure there is a net gain to biodiversity overall. Avoid any loss of biodiversity through ecological protection and enhancement, and good design. Where this is not possible, mitigate and as a last resort, compensate for any loss.	As above, the Proposed Development is landscape-led, and the structural planting proposals throughout the development will provide ecological enhancements. The Proposed Development will provide biodiversity net gain in excess of 10%. The shortfall against the trading rules will be addressed through the purchase of credits.
Incorporate SuDS within the Green Infrastructure to improve biodiversity and water quality	This has been incorporated into the Proposed Development, in accordance with the parameters set by the hybrid planning permission.
Note: the other elements listed under the Biodiversity and Green Infrastructure part of Policy SA20 relate to the wider site, beyond the Proposed Development	
Highways and Access	
Provide a Sustainable Transport Strategy which identifies sustainable transport infrastructure improvements and demonstrates how the development will integrate with and enhance the existing sustainable transport network providing appropriate enhancements to the existing public transport networks and safe and convenient routes for walking and cycling to key destinations and links to the existing networks.	The Transport Statement submitted with the reserved matters application details how the anticipated vehicular trip generation arising from the Proposed Development, which is marginally greater than that assessed as part of the hybrid planning permission, will have no discernible impact upon the local road network.
Working collaboratively with and to the satisfaction of both Surrey and West Sussex County Council Highway Authorities mitigate development impacts by maximising sustainable transport enhancements; where	The Framework Travel Plan submitted with the Proposed Development sets out a range of measures that the Applicant will undertake to promote and maximise sustainable transport options for residents, staff and visitors.

additional impacts remain, highway mitigation measures will be considered	
Note: the other elements listed under the Biodiversity and Green Infrastructure part of Policy SA20 relate to the wider site, beyond the Proposed Development	
Flood Risk and Drainage	
Provide a Flood Risk Assessment to identify the risk of flooding for different areas of the site. A sequential approach to the location of development should be followed and sufficient space retained to allow for the natural flood flow routes that cross the site, taking account of those which come from off site	The Drainage Strategy Report submitted with the reserved matters application confirms that the Site lies within Flood Zone 1 in its entirety, thereby complying with Condition 44 of the hybrid planning permission.
Note: the other elements listed under the Biodiversity and Green Infrastructure part of Policy SA20 relate to the wider site, beyond the Proposed Development	
Contaminated Land	
Provide a detailed investigation into possible sources of on-site contamination together with any remedial works that are required; particularly those associated with the historic landfill located around Imberhorne Farm to the south east of the site	The Ground Investigation Report submitted with the reserved matters application provides a detailed assessment of the made ground within the Site associated with the historic landfill, and contains recommendations to address this material as part of the Proposed Development. The remediation strategy will be determined as part of the discharge of Condition 30 of the hybrid planning permission.
Minerals	
The site lies within the building stone (Ardingly stone) Minerals Safeguarding Area, therefore the potential for mineral sterilisation should be considered in accordance with policy M9 of the West Sussex Joint Minerals Local Plan (2018) and the associated Safeguarding Guidance	As confirmed by West Sussex Council's Minerals and Waste team during determination of the hybrid planning application, the Proposed Development will not permanently sterilise any mineral resources.
Utilities	
Occupation of the development will be phased to align with the delivery of	Phasing is addressed through Condition 28 of the hybrid planning permission. A

sewerage infrastructure, in liaison with the service provider	Utilities Statement also accompanies the reserved matters application.
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8 PLANNING BALANCE

8.1 INTRODUCTION

- 8.1.1 Policy S3 of the NPPF establishes the presumption in favour of sustainable development. This means that, when considering development proposals on sites located within settlement boundaries, Policy S4 should be applied. Policy S4 states that development proposals within settlements should be approved unless the benefits of doing so would be substantially outweighed by any adverse effects, when assessed against the national decision-making policies in the NPPF.
- 8.1.2 The principle of development is secured by virtue of the hybrid planning permission (ref: DM/23/2699), thereby confirming that the Proposed Development site lies within the settlement boundary of East Grinstead. As such, Policy S4 is applicable to the determination of this reserved matters application.
- 8.1.3 This reserved matters application provides details of the siting, design, appearance and landscaping of the 'care community' element of the hybrid planning permission, in accordance with Condition 18 of DM/23/2699.

8.2 ADVERSE EFFECTS

- 8.2.1 In accordance with Policy S4, the adverse effects of the Proposed Development are detailed below:

Heritage Considerations

- 8.2.2 As confirmed and accepted during the determination of the hybrid planning application, a degree of less than substantial harm upon the setting of the listed buildings to the north-east of the Site is anticipated as a result of the Proposed Development and the wider development secured as part of the hybrid planning permission.
- 8.2.3 As detailed within the Heritage Statement submitted with this reserved matters application, the Applicant has collaborated closely with the Council's Conservation Officer to refine the Site Layout to ensure that built form to the north-west of the Site is subservient to the listed buildings beyond, while the proposed materials have been carefully selected to align with the local vernacular.

Biodiversity Net Gain

- 8.2.4 While the Proposed Development achieves +10.88% net gain (habitat units), due to the loss of medium distinctiveness habitats (including neutral grassland), the trading rules for this typology are not satisfied. Therefore, a total of 6.24 medium distinctiveness grassland units will be purchased to address the trading rules deficit.

Trip Generation

- 8.2.5 As detailed within the bespoke trip generation exercise undertaken within the submitted Transport Statement, the Proposed Development is anticipated to result in a marginal increase in peak hour vehicle trips than assessed during determination of

the hybrid planning application - an additional three (3) vehicle movements during the a.m. peak hour and an additional five (5) vehicle movements during the p.m. peak hour.

- 8.2.6 This marginal increase in vehicle activity to/from the Site via the roundabout junction with Imberhorne Lane is not considered to be material, equating to an additional vehicle movement every 20 minutes during the a.m. peak hour and an additional vehicle movement every 12 minutes during the p.m. peak hour above the activity previously projected. The corresponding impact upon the local road network is no more discernible than the scheme considered as part of the hybrid planning permission.

8.3 BENEFITS OF THE PROPOSAL

- 8.3.1 In accordance with Policy S4, the benefits of the Proposed Development are detailed below:

Delivering High Quality Care Accommodation

- 8.3.2 The Proposed Development will provide a high-quality care village that aligns with all aspects of Policy SA20 and the hybrid planning permission.
- 8.3.3 The marginal reduction in the quantum of development, with 134 dwellings proposed against the minimum 142 dwellings required by Policy SA20, has been explained within this Planning Statement.

Economic and Social Benefits

- 8.3.4 The scheme will generate temporary jobs during the construction phase and permanent jobs during the operational phase, with 34 full-time jobs anticipated to be created. The development will also increase local spending, and support existing services and facilities in East Grinstead

Environmental Enhancements

- 8.3.5 Integration of significant additional green infrastructure, biodiversity net gain, and sustainable drainage systems will enhance ecological value and manage surface water effectively.

Energy Efficiency and Climate Resilience

- 8.3.6 The proposed development will adopt a fabric-first approach, air source heat pumps, and water efficiency measures thereby aligning with climate objectives.

8.4 OVERALL BALANCE

- 8.4.1 As required by Condition 20 of DM/23/2699, the Proposed Development is in general conformity with the parameters established by the hybrid planning permission.
- 8.4.2 The proposal will deliver a high-quality Integrated Retirement Community that will realise the 'Care Community' aspect of the hybrid planning permission and Policy SA20 of the Local Plan. The Proposed Development, which will be operated and

managed by a renowned Use Class C2 operator, will provide a valuable contribution towards addressing the need for care accommodation in Mid-Sussex, as per Policy SA39 of the adopted Local Plan.

- 8.4.3 In accordance with Policy S4 of the NPPF, the Proposed Development has not been assessed to result in any adverse effects that would substantially outweigh the considerable benefits. Therefore, the presumption in favour of sustainable development applies, and reserved matters permission should be granted without undue delay.

9 SUMMARY

- 9.1.1 The application seeks reserved matters approval for a care village of 134 dwellings (Use Class C2)

Site and Context

- 9.1.2 The Site is located within East Grinstead, in the administrative area of Mid Sussex District Council. Extending to approximately 4.6ha, it benefits from close proximity to the range of services and facilities available within East Grinstead.
- 9.1.3 The Site comprises undeveloped grazing land situated to the west of East Grinstead. It falls entirely within the built-up area boundary of the town by virtue of its allocation as Site SA20 in the Mid Sussex Site Allocations Development Plan Document.

Development Proposals

- 9.1.4 The Proposed Development comprises an Integrated Retirement Community of 134 dwellings. As described within the Design and Access Statement, an Integrated Retirement Community offers self-contained homes for sale, shared-ownership or rent, with optional levels of care or domiciliary services available for residents, alongside a range of on-site service and amenities, which will be made available for the general public to encourage community cohesion.
- 9.1.5 Rangeford Villages specialise in developing and managing later living communities for the over 60s. Rangeford Villages' mission is to create beautiful places for residents to enjoy later life, in safe, secure and homely surroundings.
- 9.1.6 The reserved matters application comprises details of the siting, design, appearance and landscaping of the Proposed Development, in accordance with Condition 18 of the hybrid planning permission.

Policy Context

- 9.1.2 The site is allocated to deliver a 'Care Community' as part of Policy SA20 of the adopted Development Plan. This provision was subsequently captured within the governing hybrid planning permission (DM/23/2699). This reserved matters application seeks to provide detail of the care community secured as part of DM/23/2699, in accordance with Policy SA20.

Technical and Design Compliance

- 9.1.3 The proposals adopt a landscape-led approach, integrating green infrastructure and sustainable drainage systems.
- 9.1.4 Design principles ensure compatibility with East Grinstead's character, active frontages, and walkable streets. Careful consideration of the nearby heritage assets and near neighbours has been undertaken and reflected within the design approach.

- 9.1.5 Environmental assessments completed demonstrate compliance with adopted policies on all technical matters.

Benefits of the Proposal

- 9.1.6 Proposals will provide 134 new Use Class C2 dwellings, addressing Mid-Sussex's acute need for high-quality retirement living accommodation.
- 9.1.7 The Proposed Development will realise a key aspect of the hybrid planning permission and Policy SA20.
- 9.1.8 Economic and social benefits include job creation within both the construction and operational phases, local spending, and support for village services.
- 9.1.9 Environmental enhancements are embedded within the proposals through green infrastructure and a climate-resilient illustrative approach.
- 9.1.10 Proposals will deliver a fabric-first approach, using air source heat pumps and water efficiency measures to ensure a high standard of environmental design for new residents.

Planning Balance

- 9.1.11 In accordance with Policy S4 of the NPPF, the minor adverse impacts of the proposals do not substantially outweigh the significant benefits of the Proposed Development. Therefore, the presumption in favour of sustainable development applies, and reserved matters permission should be granted.