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Dear Sir

**Mid Sussex District Council Local Plan Examination
Re: Crabbet Park, Worth, Crawley West Sussex RH10 4TA**

I write as the coordinator for a group of landowners in the area known as Crabbet Park, Worth, Crawley whose landholdings are set out on the attached plan and coloured orange.

This area was promoted as a strategic development site up to about 2010 when the economic downturn prevented the then selected developer partner from doing further work. Since that time I have been in communication with Mid Sussex District Council (MSDC) and subsequently have had a meeting with the acting Head of Planning late last year regarding this site, making it clear that there is now further momentum towards reinvigorating its strategic promotion. This is ongoing with the re-selection of a developer partner now at an advanced stage.

In the pre-2010 submissions which were submitted on behalf of the then developer partner by consultants RPS, it was envisaged that the site could accommodate circa 2,300 homes or more, so would have been a major strategic contribution to housing land supply for the plan period to 2031. However, throughout that time, MSDC made it clear that it did not want to see the Crabbet Park area developed. Essentially it appears to have viewed Crabbet Park as an adjunct to Crawley and thereby achieving nothing for the needs and purposes of Mid Sussex District

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per se and in spite of the recognised unmet need for Crawley BC of 184dpa (3,128 dwellings over a 17 year period).

All the landowners whose land is coloured orange on the attached plan have in recent times reconfirmed to me that they are willing for their land to be promoted for development. There is every reason to believe furthermore that there are other owners (particularly between the coloured land and the M23 to the west) who would be willing to become involved if there is a realistic possibility of development.

It is true that apart from the dialogue with MSDC, no formal promotion of Crabbet Park has been undertaken in this round of the District Plan submission and examination process. However, Crabbet Park continues to feature in the list of those sites that for whatever reason are not in consideration and in the **Table 1 of MSDC 5a (revision to MSDC5)** is shown as rejected.

Looking at the wider local plan architecture it is necessary to consider the various factors at play here:

1. The need for MSDC to meet its own housing needs for the period to 2031 and deal with under delivery since 2014.
2. The unmet housing needs for Crawley Borough with its very constrained boundaries being 184 dpa which can only be met by the allocation of sites in MSDC.
3. The unmet housing need of Brighton & Hove, which is an area of significant constraint, Mid Sussex being an area of less constraint being able to make a valuable contribution to this unmet need.
4. The acknowledged growth area status of the Gatwick Diamond centred around the Crawley/Gatwick area;
5. The impact of Gatwick Airport both in terms of noise contours affecting housing land suitability and its propensity to generate additional employment needs estimated to be in the order of 13,000 new jobs to 2025.
6. Existing transportation infrastructure and the constraints on providing improvements;
7. AONB status affecting large areas of Mid Sussex District south and east of Crawley
8. The affect of the Ashdown Forest 7km Protection Zone
9. The desirability in principle of locating new housing development where it can best meet the needs of people wanting to live, work and pursue leisure activities, normally near to existing urban centres.

The Local Plan makes a poor attempt to rationalise these issues. It assumes that Haywards Heath and Burgess Hill between them are somehow self contained, sustainable centres on their own when it is clear that many of the occupants of new homes built in these locations will simply travel up to the Crawley/Gatwick area for their employment and most probably for many other services and facilities as well. A New Settlement at one time promoted west of Burgess Hill would simply be an exaggerated example of the same work/life travel conundrum.



The purpose of this letter is to comment on the reasons given as to why Crabbet Park is said to be 'unsuitable' and to comment on the SHLAA review with particular reference to the document '**MSDC 5a - Sustainability Appraisal/SHLAA – Housing Provision – Implications**'.

Addressing the summary statements in MSDC 5a therefore:

- **There are no further deliverable/developable strategic sites (500+ dwellings) that could be allocated in the plan, however they are not ruled out indefinitely.**

This is plainly incorrect. Crabbet Park would be available within the District Plan time horizon and could be rolled out quickly. All that is required is for the Council to cease being wholly negative towards it. A consistent approach to SHLAA assessment of sites is required.

- **In terms of absolute numbers, to provide a requirement of 850pa, almost 40 additional sites currently listed as undeliverable/undevelopable would need to be developed. For an additional 900dpa, over 60 additional such sites would need to be developed. These sites have all been ruled out for suitability/availability/achievability reasons, often a combination of reasons, as the SHLAA indicates.**

A site such as Crabbet Park would make a major contribution to offset the Council's analysis of the additional total number of sites needed. Crabbet Park would be capable of delivering circa 200dpa once consented and MSDC's rationale for stating that almost 40 additional sites is needed to meet a requirement of 850dpa is not understood.

- **Cumulative harm to protected landscapes (AONB), environmental designations and heritage assets is much greater at housing provision over 900dpa, worsening as housing provision increases. For example, just in terms of primary landscape designations, to meet 850dpa a further 8 sites (200+ units) are likely to be required within the AONB. To meet 900dpa, this increases to 12 sites, 300+ units.**

Nearly all the Crabbet Park site as identified on the attached plan lies outside the AONB.

Moreover it lies beyond the 7km protection zone associated with the Ashdown Forest, unlike the proposed site at Imberhorne Farm

Crabbet Park could accommodate more than $\frac{2}{3}$ of the estimated additional requirement under the 900dpa scenario.



- **Provision of over 900dpa would also require a large number of sites with highways, transport and access issues being developed. Whilst some might be capable of mitigation, there is little or no evidence on which to rely in this respect, and almost certainly mitigation would impact viability. Furthermore, these sites may not be achievable, and in-combination effects with current committed supply may arise.**

A site well related to existing employment facilities, to road and rail transportation and the urban area of Crawley/Gatwick together with easily achieved extension of the Fastway Bus system and multi-modal transport opportunities would have none of the stated disadvantages.

Among the Crabbet Park landowner group is the Paddockhurst Estate which owns the land between the area coloured on the attached plan and M23 Junction 10A (Maidenbower/Balcombe Road) and would if necessary be in a position to assist with a new access to a currently underutilised junction thus easing congestion at J10.

- **The re-casting of the draft plan by including provision for more than 800 dpa will change the character of the plan by (a) requiring allocation of non-strategic sites below 500 units in size and (b) requiring significant additional allocations within the areas covered by made Neighbourhood Plans, thereby undermining them and one of the fundamental aspects of the draft plan.**

The Worth Parish Neighbourhood Plan is not a 'Made Plan' and neither of the scenarios claimed necessarily follow from an allocation at Crabbet Park.

- **The draft plan would narrowly demonstrate a 5 year housing land supply with a requirement of 800 dpa. Above that this position is very unclear. Many of the sites below 500 units currently assessed as undeliverable/undevelopable are unlikely to deliver within the first 5 years of the plan period because they are either unavailable, unachievable, or subject to constraints that could not be mitigated within this timescale**

This is incorrect for the reasons advanced above.

Specific criticisms of development deliverability in the area round Crabbet Park have been advanced by MSDC and other parties:

- a. That there is insufficient capacity in the Gatwick Sewage Treatment Works: Up to 2010 when promotion of Crabbet Park effectively ceased, the Council was claiming that without established capacity at the STW, it could not, on deliverability grounds make an allocation at Crabbet Park. At the same time, Thames Water, operator of the Gatwick STW were maintaining that they would not put anything in their capital improvements for improved capacity



programme unless there was a known Local Plan allocation. Faced with this patently absurd situation the then promoters proposed an on site private sewage treatment plant – which suggestion was obviously resisted by Thames Water with the Council latching onto this as further reason to demur. These constraints also existed and applied to the area of land West of Copthorne, north of Copthorne Way, Copthorne, West Sussex on which MSDC granted planning permission in May 2016 for the development of 500 homes, 15,500 sq m of employment use and associated facilities, ref 13/04127/OUTES.

- b. Inadequate provision for surface water and risk of flooding downstream (Smallfield and Burstow areas): the area has a more or less continuous slope from its southern boundary along Worth Way, north across the Turners Hill Road and towards the Old Copthorne Road. Both along the east and the west sides there are established ponds and watercourses. Previous promoted suggestions have made it clear that all water runoff from hard surfaces within the Crabbet Park site could easily be attenuated as is the case for the majority of development in Mid Sussex due to the nature of the geology.
- c. MSDC assess that the site as being partly located within the AONB and that there is no evidence to support exceptional circumstances for development in the AONB. Only a small portion of the site, south of Turners Hill Road is within the AONB and the master-planning of the development scheme can be sensitive to the area of designation.

For the above reasons, and regardless of the specific merits of a particular site, the position put to you by MSDC is not as it seems; capacity in absolute terms and by reference to locations assumed to be available have been inadequately investigated and rely solely on the premise that available sites only come forward through the efforts of developer led promotion. The land owners would have liked to get into a dialogue with the Council many months ago but this narrow interpretation of entry into the Local Plan process, of sustainability and availability of sites as judged by the mechanism and personalities of their proposers has undoubtedly caused it to miss some important opportunities and misrepresent the true position.

The Crabbet Park landowners will shortly be appointing a developer-led promoter to take this forward.

Yours faithfully,

John Lytton BSc FRICS IRRV ACI Arb