

Mid Sussex District Plan 2014-2031 Examination in Public

Housing Matters Hearing Statement

Prepared by Thakeham Homes Ltd

November 2016

Representor No. 20080

Contents

- 1.0 Introduction
- 2.0 Housing Matters Question 8
- 3.0 Housing Matters Question 9
- 4.0 Housing Matters Question 10

Appendices

Appendix 1: Site Location Plan

Appendix 2: Previous Site Representation submitted by Terence O'Rourke Ltd

Appendix 3: Great Harwoods Farm, East Grinstead – Sustainable new homes and public open space

1.0 Introduction

- 1.1 This statement has been prepared by Thakeham Homes Ltd for the Housing Matter (**ID3**) hearing session scheduled for 29th November 2016 relating to the Mid Sussex Mid Sussex District Plan 2015 2031.
- 1.2 Thakeham Homes has a number of land interests in Mid Sussex and this statement relates to the promotion of land known as Great Harwoods Farm, East Grinstead to deliver a residential scheme of circa 300 dwellings and an area of Suitable Alternative Natural Greenspace (SANG) together with associated infrastructure.
- 1.3 Thakeham Homes is a member of the Mid Sussex Developers Forum (the Developers Forum) which was set up in September 2016 in order to assist the Inspector, Mid Sussex District Council (MSDC) and other key stakeholders through the Mid Sussex District Plan 2015-2031 Examination. In addition, Thakeham Homes are relying on the Statements prepared by Savills (in respect of Pease Pottage) and Barton Wilmore LLP (in respect of the land to the West of Burgess Hill)
- 1.4 This statement therefore only addresses questions 8 (Site selection and housing distribution), 9 (Trajectories) and 10 (Five year housing land supply) in respect of our interest at Great Harwoods Farm, East Grinstead. The remaining questions are addressed in the Statement prepared on behalf of the Developers Forum.

Previous Representations

1.5 The statement follows the submission of representations prepared by Terence O'Rourke Ltd on behalf of Thakehem Homes Ltd. The representations were made on 15th January 2015 (ref: 20080. For ease of reference a copy of the original representations are included at Appendix 2 of this statement).

Site Location

- 1.6 The site adjoins existing development on the south eastern edge of East Grinstead. Adjoining land uses include Herontye House to the north which consists of office and residential development and residential development at Harwoods Lane to the north east and east. A sewage treatments works adjoins the site to the south east.
- 1.7 The site measures approximately 56 hectares and consists mainly of open pasture and woodland. The open areas are mainly used for the grazing of horses and countryside activities. The areas of woodland within the site, together with adjoining woodland areas, ensure that the site is well contained in views from the wider landscape.
- 1.8 The existing point of access is from Harwoods Lane but could easily be provided from Stuart Way or Edinburgh Way. The Sussex Border Path adjoins the eastern edge of the site which provides an off road cycle route into the town and south towards Forest Row. A footpath crosses the site in a south-easterly direction from Harwoods Lane which ensures the site is well connected to the surrounding network of public rights of way.
- 1.9 East Grinstead is one of the three mains settlements in Mid Sussex District. The town centre offers a range of services and facilities and a mainline railway station provides direct links to Oxted, East Croydon, Clapham Junction and London Victoria. Bus services operate along Herontye Drive to the north and Dunnings Road to the west which provide access to the town centre and other settlements including Uckfield, Crawley, Brighton and Tunbridge Wells.

2.0 Housing Matters - Question 8 (Site selection and housing distribution)

Question 8.1 –Are the methodologies described in the Strategic Site Selection Paper and the SHLAA sound?

- 2.1 The Sustainability Appraisal (SA) **(BP5)** preferred approach is to concentrate new development in the District's three main settlements including East Grinstead. East Grinstead represents a sustainable settlement offering a range of services and facilities, main line connections to London and bus links to the regionally important centres of Crawley and Tunbridge Wells. The Great Harwoods Farm site is therefore well placed to take advantage of the sustainability benefits of forming part of East Grinstead and is in line with the SA preferred option.
- 2.2 However, the Strategic Housing Land Availability Assessment (SHLAA) (EP27 site reference; 17 (EG/D/02)) and the Strategic Site Selection Paper (EP23) concludes that the site is not suitable for allocation primarily due to its location within the AONB and that it is constrained by other designations. With regard to the site's AONB location it should be acknowledged that, as set out in the LUC document entitled: "Capacity of Mid Sussex District to accommodate development" (the Study) (EP47), Mid Sussex District is heavily constrained by environmental designations such as Area of Outstanding Natural Beauty (AONB) and the South Downs National Park as well as other constraints. As a result a balance needs to be struck between locating development in the most sustainable locations and those which have the least environmental constraints.
- 2.3 The appended promotional document prepared on behalf of Thakeham Homes by Bradley Murphy Design demonstrates that, subject to appropriate mitigation, there are no constraints to development at the site. The site is well contained within its surroundings and will therefore not result in an adverse landscape impact. The proposal includes up to circa 300 dwellings and the provision of a significant area of public open space in the form of a SANG therefore respecting the site's location within the AONB. The proposal will therefore result in significant environmental and social benefits without resulting in unacceptable impacts on the wider landscape. It is therefore considered that the Great Harwoods Farm site was discounted too early. As such the criteria used to assess the SHLAA and strategic site assessments were not given appropriate weighting and therefore resulted in inconsistent output. The Council have therefore not given sufficient consideration to the development opportunity at Great Harwoods Farm and the SHLAA therefore needs to be revisited.
 - Question 8.3 To what extent is the Sustainability Appraisal preferred option (Focus development within or adjacent to Burgess Hill, East Grinstead and Haywards Heath, but encourage both larger villages and smaller villages to take growth to support the provision of additional services and meet local needs) reflected in the distribution of strategic allocations and the overall spatial strategy of the submitted plan?
- 2.4 The SA appraised a number of plan provision options, and concluded that 800 dwellings per year represents the 'tipping point' where the negative environmental effects of new development are not outweighed by social gains. The concept of the "tipping point" is addressed in the Developer Forum's response to question 8.2 where the observation is made that the National Planning Policy Framework (NPPF) makes it necessary for local plans to meet the Objectively Assessed Needs (OAN) unless "any adverse impacts of doing so would significantly and demonstrably outweigh the benefits" (paragraph 14). We do not consider that the Council has properly applied paragraph 14 of the NPPF. There is, therefore, clearly a disparity between the Council's approach and the NPPF. It is considered that, in order to resolve this matter, it will be necessary for MSDC to undertake further assessments to determine whether additional housing numbers can be accommodated in the district through the allocation of further housing sites, such as Great Harwoods Farm, subject to the delivery of appropriate infrastructure.

- 2.5 At the present time the plan does not allocate target housing figures for each Neighbourhood Plan area. As stated in the Developer Forum's response to question 8.5 (relating to neighbourhood plans), the plan falls short of providing any meaningful guidance for NP. The evidence provided in Appendix 4 of the Developer Forum's response also demonstrates that NP are delivering less than their requirements with a shortfall of circa 650 dwellings. On this basis it is considered that greater flexibility is required on the type of sites delivered outside (but adjacent to) the built up area boundaries and an increase in the threshold of 10 dwellings. With this in mind we recommend that as part of this examination additional sites previously dismissed, such as Great Harwoods Farm are considered and allocated to address the shortfall.
- 2.6 In terms of strategic allocations, the plan allocates land at King Way, Burgess Hill (Policy DP8) for up to 480 dwellings, land to the north and north west of Burgess Hill (DP9) (Northern Arc) for mixed uses including 3,500 dwellings and land at Pease Pottage (Policy DP9a) for 600 dwellings. These three allocations are considered to be sustainable and in line with the SA preferred option as they are either well related to one of the districts main settlements (Burgess Hill) or, in the case of Pease Pottage, well related to the regionally important settlement of Crawley and a direct and positive response to address the significant unmet needs of Crawley Borough. We do however consider that additional allocations are required to assist in delivering the annual housing requirement across the plan period at the level determined through the examination process.
- 2.7 The approach proposed within the submission version of the Plan has the potential to undermine the sustainable growth of other larger settlements in the district, particularly that of East Grinstead. As stated in the Developer Forum's response to question 10.1 (five year housing land supply) the plan is heavily reliant upon a single large scale site which will have long lead in times, with only two further allocations proposed to meet the short term delivery requirement. There is also a reliance on NP to allocate small scale sites and, as stated above, this approach is currently resulting in a significant housing delivery shortfall.

3.0 Housing Matters - Quesiton 9 (Trajectories)

Question 9.1 - What are the housing delivery trajectories overall and a reasonable estimate from the neighbourhood plans?

3.1 Appendix 4 of the Developer Forum response provides an analysis of the delivery and allocation of sites in Neighbourhood Plans across Mid Sussex District.

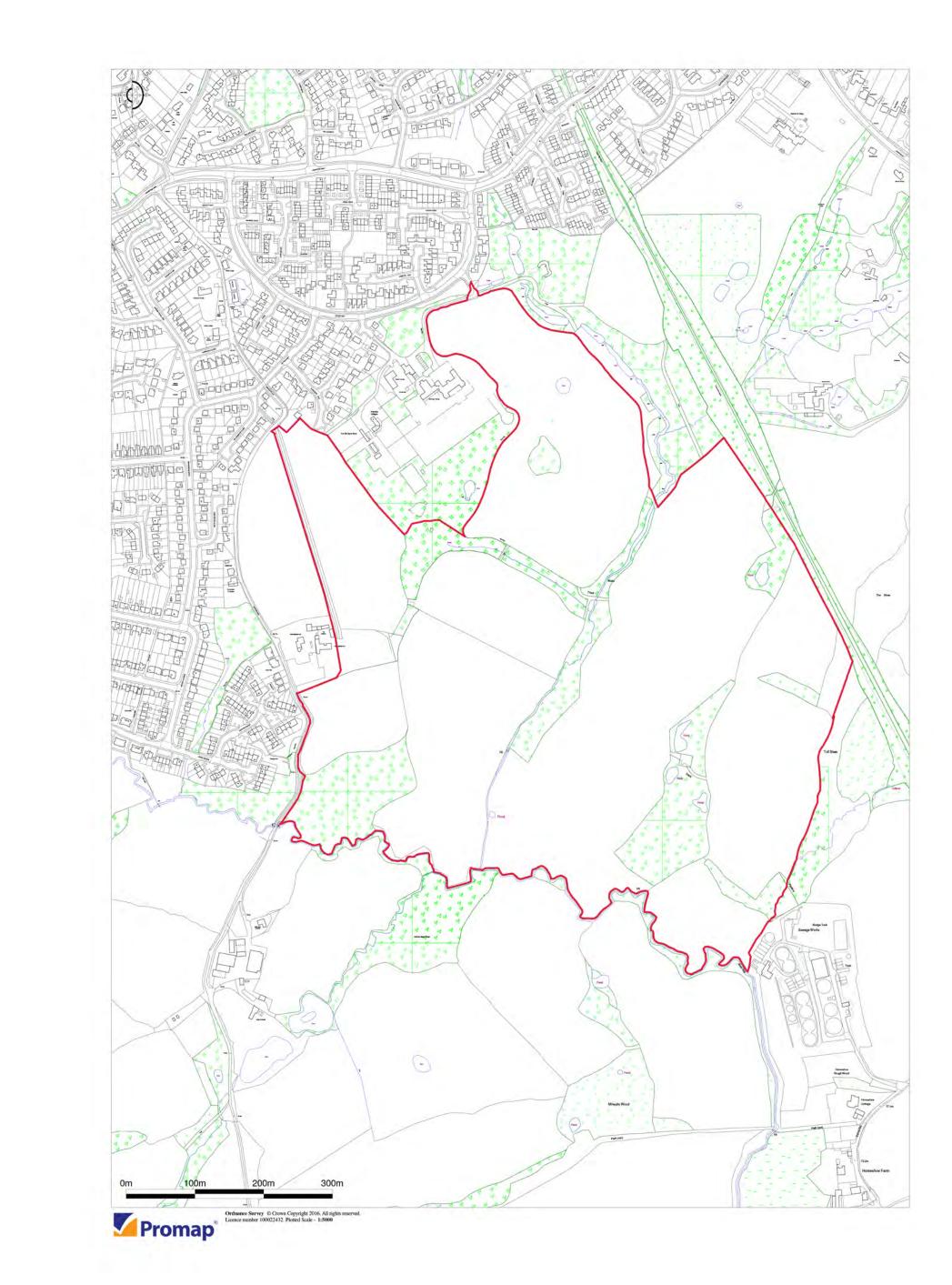
4.0 Housing Matters - Question 10 (Five year housing land supply)

Question 10.6 - Will the plan's strategic allocations and policies, together with allocations from neighbourhood plans and any future site allocations plan, ensure that sufficient sites are available for a 5 year supply of deliverable land to be maintained into the future? What adjustments might be made to the plan to ensure a reliable supply?

As stated previously, the plan is reliant on large scale sites with the majority of growth being concentrated in Burgess Hill. Appendix 5 of the Developer Forum response indicates that, with the exception of Pease Pottage, all major sites including Northern Arc will deliver at a slower rate than set out in the MSDC trajectories. This together with the fact that NP are not delivering a sufficient number of dwellings against the districts requirements gives a clear indication that additional housing allocations are required. In order for the plan to be positively prepared these issues should be addressed now rather than through a commitment to prepare a future site allocations document. The allocation of additional sites at this stage will ensure that a robust 5 year housing land supply is maintained and that the districts needs are met.

- 4.2 Other factors also need to be considered such as the requirement to assess housing needs against the relevant Housing Market Area (HMA) as set out in the National Planning Practice Guidance (NPPG). As acknowledged in the Inspector's Initial questions (ID1), MSDC have not satisfactorily demonstrated that the Brighton and Coastal West Sussex HMA has been taken into account. In the MSDC response (MSDC1) to ID1 the point is made that MSDC is committed to working with the relevant HMA's to resolve unmet need. In MSDC1 the Council also state that consideration needs to be given to:
 - "whether someone making a choice to live in a seaside city like Brighton, would consider the quitter attractions of Mid Sussex as an alternative location if an appropriate dwelling were not available"
- 4.3 However, the evidence set out in the SA demonstrates that there are very close connections between the district and Brighton due to the high levels of inter-migration. Paragraph 7.44 of the SA confirms that 12.01% of all people migrating to Mid Sussex came from Brighton and Hove making it the number 1 ranked location for in migration. However, no evidence based calculations have been provided to demonstrate how the needs of the two HMA's have been considered when establishing the districts OAN.
- In addition, as stated above, the 'tipping point' approach appears to be flawed as it fails to meet the requirements set by paragraph 14 of the NPPF. Having regard to this and the requirement to meet the needs of Brighton and Hove it is considered highly likely that there is both a need for and the ability to provide additional housing development in the district.
- 4.5 The allocation of smaller but equally strategically important sites at the main settlements and the larger towns and villages would demonstrate a positive and proactive approach to housing delivery and meeting this additional demand. This approach would help to ensure that local and other needs are met and would better reflect the SA preferred option. Great Harwoods Farm, East Grinstead represents an example of a suitable available and achievable site for housing development that would also result in significant benefits for the local community. Amongst other benefits the site could deliver up to circa 300 dwellings and significant levels of public open space in the form of a SANG. The deliverability document attached at Appendix 3 of this statement provides further information regarding the suitability of Great Harwoods Farm as a suitable site for allocation.

Appendix 1: Site Location Plan



Appendix 2 – Previous Site Representation submitted by Terence O'Rourke Ltd

Planning | Design | Environment

London
Linen Hall 162 – 168 Regent Street London W1B 5TE
Bournemouth
Everdene House Deansleigh Road Bournemouth BH7 7DU
Telephone 020 3664 6755

Planning Policy Division Mid Sussex District Council Oaklands Oaklands Road Haywards Heath West Sussex RH15 1SS

15 January 2015

Our Reference: 2381

Dear Sir / Madam

Mid Sussex District Plan 2014 - 2031: Consultation Draft

I contact you on behalf of our client, Thakeham Homes Limited and enclose its response to Mid Sussex District Council's consultation for your review and consideration.

Having had the opportunity to review the draft plan, we have a number of key areas of concern that are outlined in greater detail within the enclosed consultations response.

I would very much welcome the opportunity to meet with you to discuss the representations and how my client's concerns with the plan (as currently drafted) might be addressed.

Please feel free to contact me on 020 3664 6755 should you wish to discuss this representation further.

Yours faithfully,

Jacqueline Mulliner

(T. Mullines

Director



Mid Sussex District Plan 2014 – 2031: Consultation Draft Representations made on behalf of Thakeham Homes Limited.

The Challenge Facing the District (Paragraph 2.9)

This section of the draft plan identifies the key challenges facing the district. Paragraph 2.9 (bullet point 6) acknowledges that house prices in Mid Sussex are particularly high relative to average incomes. This causing affordability issues, particularly for the young.

It is evident, from the Government's position on the matter and examining Inspector's report, that the lack of housing supply will also be a significant contributory factor in respect of the 'affordability' of homes in the district. It is therefore requested that the text is amended to state this.

Meeting Local Housing Need (Paragraphs 3.10 to 3.12)

Following the examination into the Mid Sussex District Local Plan in November 2013, the Inspector concluded that the Housing Market Assessment (October 2012), prepared for the Council, is fundamentally flawed, failing to consider links to all nearby housing markets, especially those comprising the Sussex coastal authorities.

In terms of the housing strategy, a fundamental element of the Local Plan in accordance with the NPPF presumption in favour of sustainable development as well as para 47 and 159. Clearly the SHMA is an important starting base for the evolution of the plan. This has confirmed by case law, Gallagher Homes, Lioncourt Homes v Solihull [2012] EWHC 1283 (Admin), issued July 2014 (and subsequently upheld in the Court of Appeal Case No C1/2014/1702) which followed the Inspector's Report. Specifically, "in plan making the full objectively assessed housing needs are not only a material consideration but a consideration of particular standing with a particular role to play." (para 91), and:

"... It is insufficient, for NPPF purposes, for all material considerations (including need, demand and other relevant policies) simply to be weighed together. Nor is it sufficient simply to determine the maximum housing supply available, and constrain housing provision targets to that figure. Paragraph 47 requires full housing needs to be objectively assessed, and then a distinct assessment made as to whether (and, if so, to what extent) other policies dictate or justify constraint. Here, numbers matter; because the larger the need, the more pressure will or might be applied to infringe on other inconsistent policies. The balancing exercise required by paragraph 47 cannot be performed without being informed by the actual full housing need." (paragraph 94)

Clearly, the housing figure is a key starting point and fundamental to the plan strategy presented as a whole. In that context, it is impossible to consider whether the allocations presented in the consultation draft plan are the most sustainable alternative in the context of meeting the need.

For example, it is impossible to say whether policies for the protection of the countryside (including policy DP13 in respect of the AONB), where they relate to the settlement boundaries and land abutting those boundaries, are a positive and sustainable approach to meeting the objectively assessed housing need of the district.

Planning | Design | Environment

In the same vein, it is impossible to say whether a policy relating to local gaps is positive, effective or sustainable.

Without understanding the OAN and the options tested to accommodate that OAN (as well as the consequences of not accommodating the OAN, if the policy-on 'requirement' is set at a lower level) very little can be considered in terms of whether the strategy within the plan, which must be read as a whole, is positive, effective, justified and consistent with the NPPF.

As at the present time the Council does not have a robust and up to date evidence base in which to base decisions on housing need and therefore the need for and/or the availability of land in the district, commenting on the strategy, in terms of soundness, is ineffectual.

Ensuring Housing Development is in Suitable Locations (Paragraphs 3.13 to 3.15)

It is the Council's proposed strategy to allocate a significant proportion of the proposed development to Burgess Hill. It is the intention of the draft plan for the remainder of development (of a non-strategic nature) to be delivered by other towns and villages in the district, primarily through allocations in Neighbourhood Plans. In line with our comments above, it is not at this stage possible to know whether this is an effective or positive strategy as, quite simply, there is no indication of the scale of development to be accommodated. However, looking at the evidence to date, it is possible to say that it is highly unlikely that the strategy will be sound.

For the scale of development required to meet the anticipated scale of OAN allocating only two strategic sites, at the same town, and relying on neighbourhood planning to deliver the remainder is unrealistic. Strategic allocations do take time to start delivering and then can only deliver at a rate dictated by the market at the time. For example strategic allocations in Wokingham and Test Valley have taken many years to start delivering. In both cases, the overreliance on a very small number of strategic sites was identified as a significant risk during preparation of and/or examination of those plans. As predicted by the objectors, the risk has borne out and has led to the subsequent release of additional, smaller sites, as a consequence of housing land supply shortfalls – encountered through lack of delivery (as anticipated) on the strategic sites.

Quite simply, to demonstrate a deliverable and developable supply of land for housing (as is required by the NPPF paragraph 47 and footnotes 11 and 12) more outlets are required – more strategic sites, to confirm the longer term rolling position across the plan period, and more non-strategic sites to provide flexibility and demonstrate supply more significantly in the first five-years.

At the examination into the Mid Sussex District Local Plan in November 2013, the Inspector noted in his decision letter (dated 2 December 2013) that the Council acknowledged that some of the non-strategic housing sites included in the Council's 'Housing Supply Document' (March 2013), to be delivered as part of the Neighbourhood Plan process, should actually be categorised as 'strategic' (paragraph 39).

It is anticipated that Neighbourhood Plans may be required to deliver as many as 2,000 new homes throughout the District during the plan period. The proposed strategy of allocating housing on this scale through Neighbourhood Plans relies on Neighbourhood

Planning | Design | Environment

Plans being adopted across the whole district. It is considered that this approach represents a high-risk strategy for housing delivery given it's success is dependant on a) all of the Neighbourhood Plans being adopted and b) all plans including suitable number of sites capable of delivering required housing numbers.

In any event, it is considered that the Council's approach has the potential to frustrate and undermine the sustainable growth of other larger settlements in the district, particularly that of East Grinstead. This approach will effectively stagnate those settlements, fail to meet local needs, fail to secure social, economic and environmental benefits for these settlements and is, in effect, contrary to the evidence with regards to the settlement hierarchy and the approach to sustainable development.

Whilst constraints may apply, for example at East Grinstead, there is no reason why such constraints could not be overcome and addressed, as they have elsewhere. For example strategic development in the AONB is not unknown and is not, as a matter of fact, contrary to the aims and objectives of sustainable development. This has recently been tested at the Wiltshire Core Strategy examination, in respect of development at Marlborough, which lies within the North Wessex Downs AONB. In that case, the Community Area is identified to accommodate 920 new homes, 220 of which will be on a greenfield site within the AONB. The Inspector has concluded (report dated 1 December 2014) that:

"As indicated by the Framework (para 116), a balance needs to be struck between the statutory purposes of AONB designation and other factors. In this instance, I agree with the Council's interpretation of the evidence which indicates that a limited degree of development upon the Salisbury Road site is both justified and clearly preferable to alternative locations such as Chopping Knife Lane in sustainability terms. The undue limitation of housing for an existing market town, such as would be secured by not having a modest degree of growth, would not satisfy the strategic objectives of the Core Strategy as a whole." (paragraph 276)

The Inspector went on to indicate that the allocation of 220 homes should be considered as a minimum. Hence, the AONB should not be viewed as a show-stopper in terms of the allocation of sites and a balance needs to be struck between other factors influencing the extent to which the plan contributes towards sustainable development (as required by s39 of the Planning & Compulsory Purchase Act) and is effective.

East Grinstead is a good sized settlement in its own right, one of only three main settlements within the district. It has a population of approximately 24,000. This is only marginally less than that of Burgess Hill. The town also benefits from good road and mainline rail links to London, Gatwick airport and the south coast.

It is therefore considered that a more sustainable strategy, tested against reasonable alternatives, would be to allocate additional strategic allocations in and around the three main towns of Burgess Hill, East Grinstead and Haywards Heath in the draft plan in order to safeguard delivery of new homes across the district and secure the effectiveness of the local plan.

In this context we note that the SA. Section on 'Distribution of Development', has not considered the option of a strategically scaled development <u>only</u> at Burgess Hill. Instead, the options assume strategically scaled development (focus of development) at

Planning | Design | Environment

all three of the main settlements. It is therefore difficult to see how it can be reasonably argued that the SA supports the strategy set in the consultation draft plan.

Further, in assessing the potential strategic sites at East Grinstead it is not possible to conclude that the sites have been considered on a fair and equitable basis, for example, given the fact that, evidently, all strategically scaled housing development in the district will be able to contribute positively to the provision of decent and affordable housing yet the 'preferred sites' are scored positively in this respect and non-preferred sites scored negatively. Equally in terms of issues such as (but not solely) access to education, encouragement of town centre regeneration and reduction of road congestion, it would appear that the sites have been treated on an un-equal basis, with mitigation being considered in respect of some sites and not others.

This is a serious flaw in the SA, which would mean that it cannot be concluded with any certainty that the strategy is sound, in respect of the consideration of alternatives. This again was a fatal flaw in respect of strategic allocations at Chippenham, Wiltshire, that the Council should be addressing at this important stage.

Ensuring Housing Delivery (paragraphs 3.19 to 3.25)

As stated previously in the section above, it is considered that the draft plan proposes an approach that is overly reliant on Neighbouring Plans delivering a significant level of housing across the district over the plan period. The Council, through the local plan, must be able to demonstrate at least a five-year deliverable supply of housing land and a 5-10 year of developable land. Given the, now well rehearsed, issues with the delivery of homes through the neighbourhood planning process in Mid-Sussex and elsewhere it is unacceptable to place even further reliance on this process. Strategic allocations should be made in the local plan.

A further alternative may be to identify reserve allocations to spatially distribute dwellings should the Neighbourhood Planning process fail to allocate the required sites to deliver to strategic housing numbers.

Meeting Local Infrastructure Needs (Paragraphs 3.26 to 3.28)

The draft plan outlines that the Mid Sussex Community Infrastructure Levy Charging Schedule will be the main mechanism for delivering the necessary infrastructure for new development, and that this will be supplemented with negotiated section 278 agreements to secure site-specific highway works.

The Mid Sussex Draft Infrastructure Development Plan (May 2013) recognises that improvements to the road infrastructure are key to the delivery of new homes and business in Mid Sussex. It also specifically identifies both the A22 and A264 as parts of the road network in need of investment.

Insufficient capacity of the road network is cited as a reason by the Council for discounting East Grinstead as a settlement capable of accommodating housing development on a 'strategic scale'. It is considered that the approach to funding of new road infrastructure policy through CIL and section 278 Agreements may make this feasible, facilitating additional economic and housing growth. Further, and in any event, there are transport schemes within East Grinstead that could be specifically linked to the site/development proposals and therefore continue to be able to be secured

Planning | Design | Environment

through a s106 agreement – further unlocking capacity for development at this main settlement, to the significant benefit of the wider community.

Therefore, my client is supportive of the Council's approach to the funding, but consider that this approach should not exclude the ability for additional fair, reasonable and necessary benefits to be achieved.

Policy DP5: Housing

It is recognised that the Council does not presently have a robust and up-to-date evidence base comprising housing need and housing land supply for the district and, where relevant under the duty to cooperate, neighbouring authorities. As a consequence the draft policy does not include a strict wide housing provision figure or any other detail on how the Council will deliver housing over the plan period, other than at the Strategic Policy Allocation at Burgess Hill (covered in draft policies DP6, DP7 and DP8). The SA will need to assess all reasonable alternatives, both in terms of the accommodating the OAN and in terms of strategic site alternatives. At the moment the SA is flawed.

The Council's approach to housing delivery, as set out elsewhere in the draft plan, is to restrict strategic level housing growth to Burgess Hill, relying on the Neighbourhood Planning process to deliver the remaining significant (and still strategic in terms of the district-wide provision) housing requirement in the other towns and villages including East Grinstead. This strategy places the delivery of the strategic objective of housing delivery at serious risk. This risk has not been assessed and it would not be possible to conclude that the plan, and strategy, is sound in terms of whether it would be effective.

It is suggested that policy is drafted to allow for additional strategic allocations in and around the main towns of Burgess Hill, East Grinstead and Haywards Heath in the draft plan in order to safeguard delivery of new homes across the district.

A further alternative would be to identify reserve allocations to spatially distribute dwellings should the Neighbourhood Planning process fail to allocate the required sites to deliver to strategic housing numbers.

Conclusion

In summary, without the OAN, consideration of alternatives, identification of policy-on housing requirement and then full and equitable consideration of alternatives regarding both the distribution of development and strategic sites the plan the extent to which the strategy put forward in the consultation draft is sound cannot be considered.

What is clear is that strategic development opportunities at East Grinstead have been dismissed without the support of the evidence base. This is unjustified. What is also clear is that proceeding with the current strategy renders the plan ineffective.

Appendix 3 – Great Harwoods Farm, East Grinstead – Sustainable new homes and public open space

Great Harwoods Farm

Sustainable new homes and public open space

Submission to Mid Sussex District Council Local Plan Examination

October 2016





Pro	oject Number: BMD.216	Document Reference: BMD.216.RP.		P.001	
Revision	Purpose of Issue	Originated	Reviewed	Approved	Date
-	Working Draft	NT	NT	RM	26/05/16
А	Draft	NT	NT	RM	16/08/16
В	Submission Draft	NT	NT	RM	22/09/16
С	Final Submission Draft	NT	NT	RM	23/09/16
D	Final	NT	NT	RM	04/10/16









Planning consultants



Ecology consultants



Transport consultants

BRADLEY MURPHY DESIGN LTD 5 The Courtyard, Hatton Technology Park, Dark Lane, Hatton, Warwickshire, CV35 8XB e:info@bradleymurphydesign.co.uk t: 01926 676477

This report is the property of Bradley Murphy Design Ltd and is issued on the condition it is not reproduced, retained or disclosed to any unauthorised person, either wholly or in part without the written consent of Bradley Murphy Design Ltd.

Company No: 7788475

Contents

\cap	100 tra al. 10 ti.	
01	Introduction	n i

- 02 Planning Context
- 03 Urban Context
- 04 Landscape and Visual
- 05 Ecology
- 06 Design Considerations
- 07 Concept Framework
- 08 Illustrative Proposals
- 09 Economic and Community Benefits
- 10 Summary

01 Introduction

This document has been prepared by Bradley Murphy Design (BMD) on behalf of Thakeham Homes who control land at Great Harwoods Farm, East Grinstead. Great Harwoods Farm is proposed to deliver much needed new homes along with extensive public open space.

Purpose

This document demonstrates that the proposed development at Great Harwoods Farm would create a high quality residential environment that could meet the economic, social and environmental objectives of sustainable development.

The document demonstrates how the Site could be designed for development and:

- · Describes the urban and landscape context of the Site:
- · Appraises the Site constraints and opportunities; and
- · Demonstrates how the Site could be integrated with the existing settlement and the landscape setting.

Background

The Great Harwoods Farm Site is being promoted by Thakeham Homes to deliver up to 300 new homes. The proposals would cater for an anticipated need for Mid-Sussex District Council to identify site (s) for an additional 500-1000 dwellings over the Plan period that is expected to arise out of the Examination process. Acknowledging the Site's location within the High Weald Area of Outstanding Natural Beauty (AONB) the proposals will incorporate a significant area of public open space and green infrastructure, which would include an extensive Country Park / SANG.

Land ownership

Thakeham have an option over land edged red, shown on the plan opposite, amounting to some 48ha.

Location

The Site is located on the south-eastern fringes of East Grinstead between the suburb of Sunnyside and the Forest Way Country Park, which is on the route of the former Three Bridges-Royal Tunbridge Wells Railway. Access to the site is achievable from Stuart Way and Edinburgh Way which connect through to the A22 Lewes Road via Herontye Drive.

Site description

The Site is well related to the edge of East Grinstead and contained in views from the wider landscape by woodland.

Adjacent residential areas form part of a planned housing estate which was built in the 1970's and 1980's. The settlement edge extends to Harwoods Lane, Herontye House and Great Harwoods Farm house at the Site's northern and western boundaries.

Herontye House, was built in 1912 as a Manor but has since been converted to offices and flats. Coniferous and broad leaved trees contain Herontye House from the Site. A track on the Site's western boundary extends from Harwoods Lane to Great Harwoods Farm house.

Adjacent to the Site's south-eastern corner is a Sewage Treatment Works (STW).

The Site comprises fields of grassland and areas of woodland. A ghyll stream flows north-south through the Site. The local land form and woodland associated with the ghyll stream divide the Site into two distinct parts. Blocks of woodland break views across the Site.

A footpath crosses the Site in a south-easterly direction from Harwoods Lane.



Figure 1 Land ownership



02 Planning Context

The National Planning Policy Framework (NPPF)

The NPPF states the purpose of the planning system is to contribute towards the achievement of sustainable development, and at the heart of the NPPF is a requirement on behalf of every local planning authority to pro-actively drive and support sustainable development to deliver the homes that the country needs. The three dimensions to sustainable development are named as:

- Economic building a strong, responsive and competitive economy;
- Social supporting strong, vibrant and healthy communities, by providing the supply of housing required to meet the needs of present and future generations; and
- Environmental contributing to protecting and enhancing the natural, built and historic environment.

Pursuing sustainable development within the NPPF involves seeking positive improvements in the quality of the built, natural and historic environment as well as in people's quality of life including (but not limited to):

- Making it easier for jobs to be created in cities, towns and villages;
- Moving from a net loss of bio-diversity to achieving net gains for nature;
- Replacing poor design with better design;
- Improving the conditions in which people live, work, travel and take leisure; and
- Widening the choice of high quality homes.

The NPPF states that plans and decisions need to take local circumstances into account, so that they respond to the different opportunities for achieving sustainable development in difference areas. Great Harwoods Farm provides an opportunity to achieve and support all three dimensions to the NPPF's vision of sustainable development.

An important aspect in the demonstration of sustainable development is the strategic context of the Site. The Site is in a sustainable location, in close proximity to the services and railway station of East Grinstead, but also within commuting distance to the facilities and employment opportunities of Crawley and of Gatwick Airport, which is a major economic driver within the South East.

Delivering a wide choice of high quality homes is one of the Core Policy Principles of the NPPF. Local planning authorities must ensure that their Local Plans meet the full, objectively assessed needs for market and affordable housing. In order to ensure a wide choice of homes is available, local planning authorities should plan for a mix of housing based on current and future demographic trends. Great Harwoods Farm has the potential to provide homes which relate to East Grinstead's specific housing needs, in accordance with the NPPF, including homes for first time buyers, family properties, affordable dwellings and potentially an assisted living facility.

Within the sphere of sustainable development, the NPPF is clear in stating that the three dimensions are mutually dependent. This is recognised particularly in Core Principle 8 'Promoting Healthy Communities'. The NPPF perceives healthy to encompass social inclusion, supporting day-to-day needs, access to high quality open spaces, and enhanced public rights of way and access. The location of the site immediately adjacent to the settlement boundary of East Grinstead provides innumerable facilities and services, including community, leisure, retail and

educational uses. In addition, the over-provision of open space within the Country Park / SANG would not only provide high quality open space for the new residents, but also existing residents of the wider settlement. In this way, the development of Great Harwoods Farm has the potential to promote and strengthen the healthy community of East Grinstead.

In the round, the proposal is therefore inherently sustainable, and given this fact, the NPPF 'presumption in favour' is engaged.

The penultimate Core Principle of the NPPF relates to Conserving and Enhancing the Natural Environment. Paragraph 116 states that major development should only be granted in designated areas such as National Parks, Broads and AONB's in exceptional circumstances where it can be demonstrate that they are in the public interest. Consideration of these positive applications should include an assessment of:

- The need for the development, including in terms of any national considerations, and the impact of permitting it, or refusing it, upon the local economy;
- The cost of, and scope for, developing elsewhere outside the designated area, or meeting the need for it in some other way; and
- Any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated.

Whilst the site is located within an AONB, it can be demonstrated that, in relation to the exceptions detailed in Paragraph 116, the proposed development would be in the public interest. New housing is in high demand in both Mid Sussex and the neighbouring district of Crawley, which is currently unable to meet its own housing requirements. Furthermore Mid Sussex is heavily constrained by the AONB in the north and the South Downs National Park in the south. As a result there are few opportunities for development to meet the growing housing needs outside of these designated areas. In addition, the development proposes to deliver approximately 30ha of open space and Suitable Alternative Natural Greenspace (SANG) within a significant Country Park. This Country Park / SANG would provide space for leisure and recreational activities alongside acting to enhance the natural environment and biodiversity in these locations. As a result, the potential detrimental effect on the environment of the proposed residential dwellings will be contained, moderated and mitigated against, in accordance with Core Principle 11 of the NPPF.

Mid Sussex District Plan (MSDP)

The Mid Sussex District Plan (MSDP) was submitted to the Secretary of State on the 17th August 2016. A central aim of the Plan is to ensure that housing needs can be met over the Plan period.

Policy DP1: Sustainable Development sets out the overarching objective for development in Mid Sussex, which is to deliver sustainable development. This includes:

- Providing housing to meet the needs of present and future generations in locations that are consistent with the Settlement Hierarchy;
- Creating balanced communities that meet the needs of all residents with appropriate infrastructure and public facilities;
- · Increasing opportunities to walk and cycle, including within a green infrastructure network;
- Minimising the need to travel by providing the opportunity to access jobs, shops and leisure facilities close to home;
- Protect, enhance and utilise natural and environmental assets; and
- Respects the character of the countryside.

Based upon an assessment of the District's housing need, Policy DP5: Housing sets a requirement for 800 new homes to be delivered each year within Mid Sussex, a total of 13,600 by 2031. A proportion of these new homes are to be delivered on identified strategic sites and windfall development, with the remainder, 1,730 homes, to be delivered elsewhere in the District through Neighbourhood Plans, a future Site Allocations document and identified Strategic Housing Land Availability Assessment (SHLAA) sites.

Great Harwoods Farm is located in a highly sustainable location adjacent to the settlement boundary of East Grinstead. The MSDP identifies East Grinstead as one of the three main towns in the District, at the top of the settlement hierarchy which supports the sustainable credentials of the site. Policy DP6: Settlement Hierarchy supports the growth of settlements where it meets identified local housing, employment and community needs. As stated in the supporting text to Policy DP6: "The amount of development planned for in each settlement will need to have regard to this hierarchy, but also take account of local development needs including housing and any significant local constraints to development."

Great Harwoods Farm represents a clear opportunity to provide much needed homes required by the District, in a location sequentially favoured by the Plan as sustainable. Alongside the delivery of homes, Great Harwoods Farm would provide further benefits including public open space and improved access to the countryside whilst conserving special landscape character south of East Grinstead.

The majority of new development in the draft MSDP is focussed upon Burgess Hill as a key growth area. However, the MSDP recognises the need to ensure that East Grinstead also benefits from the opportunities delivered by new development, such as new physical and social infrastructure.

A particular constraint to the timely provision of the homes and infrastructure investment that are needed to support the aspirations of Mid Sussex is the availability and deliverability of development sites. Great Harwoods Farm is available now and could begin delivering new homes and contributing to local infrastructure in East Grinstead as early as late 2017.

The housing requirement addressed by the MSDP should respond to the duty of Mid Sussex District Council to cooperate with neighbouring authorities. Crawley is not able to meet its housing need within its boundary. As a result, some of this unmet need is to be catered for within Mid Sussex. East Grinstead is located in the north of the District and Great Harwoods Farm represents a sustainable location for delivering new homes that are well related to Crawley whilst ensuring that the benefits afforded by local infrastructure provision are focussed upon one of the District's three main towns.

A primary feature of the Great Harwoods Farm site is the opportunity to provide and secure approximately 30ha of open space and SANG with a significant Country Park for the wider benefit of East Grinstead's residents.

As stated in Policy DP18: Securing Infrastructure, the provision of social, physical and green infrastructure is necessary to create sustainable communities. The over provision of green infrastructure at Great Harwoods Farm will ensure that benefits are experienced not only by new residents but across the town, with improved public access to open and green space.



Figure 2 Site location

03 Urban Context

Pattern of development

East Grinstead historically established over a ridge which overlooks the valleys of the Medway to the south and the Eden to the north. The tower of St Swithuns Church in the Town Centre Conservation Area is a prominent landmark. Development also established alongside Dunnings Road at Dunnings Mill. Later suburban development extends south and east to the Site boundaries at Herontye House and Great Harwoods Farm house.

East Grinstead was served by two railway lines, Three Bridges - Royal Tunbridge Wells and London Lewes. A single railway now connects East Grinstead with Central London. The Three Bridges-Royal Tunbridge Wells railway has been converted to a long distance cycle path known as the Forest Way.

To the north of The Site and the former railway is the A22 Lewes Road. Settlement alongside this main routeway includes the Historic Park and Garden's at Brokenhurst. Views between the Site and Brokenhurst are entirely contained by the railway embankment.

Accessibility and connections

The Site is well served by a number of local services and facilities within close proximity.

The town centre is within 1,500m walking distance of the centre of the Site where there are a range of local services and facilities to fulfil future residents everyday needs. Local primary and secondary schools, convenience stores, a supermarket and health facilities are all within a 2km walking distance of the centre of the Site. These services and facilities including the town centre are all within an "easy" cycle distance from the Site (i.e. less than 5km cycle distance).

Existing bus services currently operate along Herontye Drive and the A22. These bus services provide access from the Site to East Grinstead town centre and to destinations further afield such as Crawley, Uckfield, Brighton, Lingfield and Tunbridge Wells.

East Grinstead railway station is located some 1.8km to the north-west of the Site and is served by a number of services with direct links to Oxted, East Croydon, Clapham Junction, and, London Victoria. The development provides an opportunity to provide new/enhanced bus services between the Site and East Grinstead. These would also benefit existing residents.

On the Site's north-eastern boundary, The Forest Way provides an off road cycle route into the town and south towards Forest Row. On the western boundary, the existing footpath that crosses the Site connects to a wider network of recreational footpaths and bridleways. Proposals would establish clear, direct and safe links through the site to existing pedestrian and cycle routes. Opportunities to provide new and improved facilities for pedestrians and cyclists between the development and everyday local services and facilities will be identified.

Given the high number of local services and facilities within a short distance of the Site, new residents will have genuine opportunities to travel locally and by modes of transport other than the private car.

The provision of 250 – 300 dwellings at Great Harwoods Farm would generate approximately 150 – 180 two-way vehicle movements in the morning and evening peak hours (between 08:00-09:00 and 17:00-18:00). This equates to between two – three additional vehicles per minute during the busiest periods of the day.

The development presents the opportunity to bring forward cost effective improvement schemes to mitigate against the impact of the development, where traffic increases are most pronounced. These will be determined by a detailed Transport Assessment that will be provided for the development. The scope of the Transport Assessment would be agreed through discussions with the Local Highway Authority, West Sussex County Council.

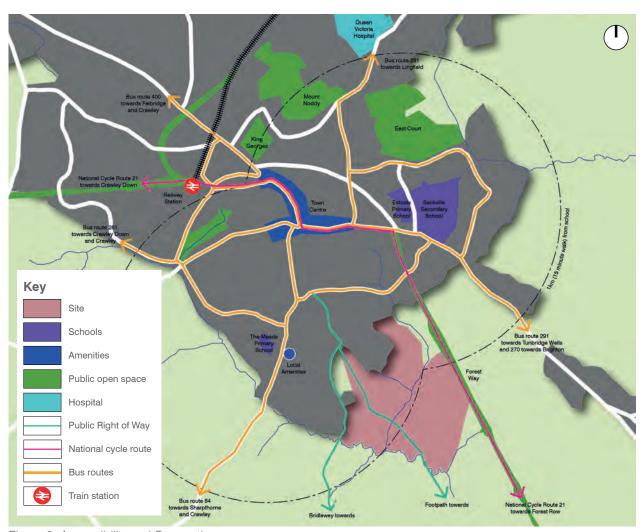


Figure 3 Accessibility and Connections

04 Landscape and Visual

The Site lies within the High Weald Area of Outstanding Natural Beauty (AONB), which extends to the southern and eastern edges of East Grinstead. The proposals shall respond to the Site's setting to establish a high quality residential scheme.

Topography and drainage

The immediate setting to the Site and East Grinstead's western suburbs is formed by a valley tributary of the River Medway. The Site generally falls in a southerly direction to this main tributary. Minor tributaries incise the valley sides forming an undulating landform. The westernmost Site area sits on relatively level ground, falling away to a tributary that follows the Site's northern boundary and then south through the Site. Higher ground within the eastern Site area also falls to the watercourses that flow through the Site and along its boundaries.

Land use and vegetation

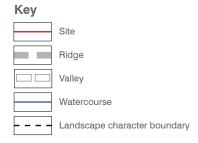
The Site is characterised by deciduous woodland, horse paddocks and areas of pasture. Land uses are consistent with the urban edge location. The Site is grazed by horses and occasionally used for off road driving and other outdoor activities. Within the Site woodland species include Oak standards with historic areas of Hazel coppice. The majority of this woodland is associated with streams and small pond features.

Landscape character

Landscape Character is described by National, County/ District and local scale assessment. At the District scale, A Landscape Character Assessment for Mid Sussex (2005) identifies the Site and surrounding area within Landscape Character Area (LCA) 6: High Weald.



Figure 4 Topography analysis



Visual context

The Site's visual envelope is restricted by the local landform and woodland cover.

From the north the Site is contained by the railway embankment and areas of woodland. The embankment affectively separates the Site from Brockhurst Historic Park and Gardens and the A22 (Lewes Road). To the south and east the site is contained by spurs of higher ground with woodland.

There are local views of the Site from adjacent stretches of the Forest Way and short stretches of Public Right of Way (PRoW). In these views, the western site area is, in part, obscured by woodland and existing development.

Views of the Site from visual receptor's to the east and south are restricted to glimpses of adjacent Site areas, seen beyond intervening vegetation.

Views of the Site from the edge of East Grinstead are limited by vegetation and existing settlement at Herontye House and Harwoods Farm. Herontye House itself is contained by boundary woodland and trees. The boundaries to Great Harwoods Farm are more open with long views that extend over the south-western corner of the site to the valley.

In views from Harwoods Lane and adjacent houses the Site's westernmost paddocks are seen beyond hedgerow. Herontye House, Great Harwoods Farm and woodland visually separate these paddocks from other parts of the Site and the wider landscape. There are partial views of the Site from the existing field access off Stuart Way.

Within the Site, views from the PRoW extend over southern parts of the Site and across the valley landscape.

Summary

Although the Site's visual envelope is generally restricted, proposed development will be located within the most contained parts of the Site that are well related to existing development. Other parts of the Site would provide publicly accessible open space. This would be maintained to enhance and retain the character of the AONB landscape.

View from PRoW over southern and eastern parts of the Site. This would be retained as Country Park / SANG

Landscape opportunities

The Great Harwoods Farm Site is contained by landform and woodland associated with a tributary of the Medway and streams which feed into this.

Development would be located within the northern and western parts of the Site, which are afforded the highest level of containment and are well related to the existing pattern of development. Proposals for new homes offer the opportunity to enhance wildlife habitat and provide new opportunities for public access.

The scheme would reflect management objectives described in the Mid-Sussex Landscape and Character Assessment (2005) and High Weald Management Plan (2014-2019).



St Swithuns Church seen from within the Site

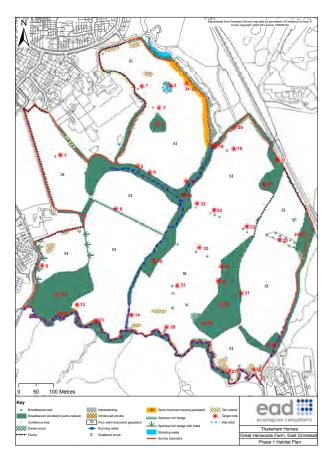
Landscape enhancement and management opportunities include:

- Restore, maintain and enhance areas of woodland and ancient woodland;
- · Extend woodland features to link and enhance existing habitats and species populations;
- Manage grassland to establish species rich meadows;
- Maintain and re-establish medieval field patterns through woodland and hedgerow planting;
- Provide opportunities for local recreation that are consistent with the primary purpose of conserving and enhancing natural beauty;
- Provide interpretation boards and educational opportunities to learn about and celebrate the character of the High Weald; and
- Reinforce a soft development edge by retaining and establishing tree cover alongside and within areas of new development.

05 Ecology

Ashdown Forest

Ashdown Forest Special Protection Area (SPA) and Special Area of Conservation (SAC) lies approximately 2.5km to the south of the Site. Ashdown Forest SPA has been designated for its Dartford warbler and nightjar populations. In accordance with Mid-Sussex District Council Policy, any development would need to demonstrate that it would not result in an adverse effect on Ashdown Forest. The proposal to provide a Country Park would provide up to 30 hectares of Suitable Alternative Natural Greenspace (SANG); this would mitigate potential adverse effects on the designated sites by providing an attractive area for dog walking and other quiet recreation, reducing the number of visitors that might otherwise use Ashdown Forest.



Habitat and species surveys

A range of surveys have been undertaken by EAD Ecology during 2013 and 2014 and 2016 to identify potential ecological constraints and opportunities to development. The Phase 1 Habitat survey identified poor semi-improved grassland and broadleaved woodland as the predominant habitats on the site. Other habitats included hedgerows, scrub, semiimproved neutral grassland, open water (ponds) and running water. Much of the woodland within the Site is identified as 'Ancient Woodland' (see Figure 5) and also by Sussex Wildlife Trust as 'Ghyll Woodland'. Development design would ensure that breaks in woodland and hedgerows were minimised and that suitable buffers and offsets were provided around existing woodland and hedgerows within the Site. Where habitat loss could not be avoided this would be mitigated by new habitat creation and management.

Protected and notable species recorded within the Site include hazel dormouse, slow-worm and grass snake, a range of common / widespread breeding bird species and at least nine species of commuting or foraging bats.

Proposals for new homes would ensure that effects on protected species were avoided where possible, for example through protection and buffering of key habitats and new habitat creation; and the development, including proposed Country Park / SANG, would also provide opportunities for enhancement for a range of species.

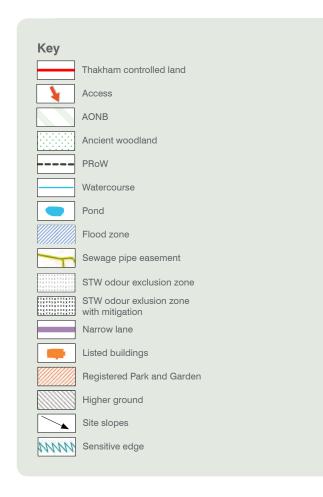
Figure 5 EAD Phase 1 Ecology Plan (2013)

06 Design Considerations

The Site's challenges and opportunities have been established by a suite of technical and environmental studies.

Challenges

- Trees and woodland: Development proposals shall maintain an offset buffer of at least 20m to all areas of Ancient Woodland. All other high quality trees and woodland within the Site shall be retained.
- Landscape and visual: New homes shall be located close to existing amenities within the most visually contained parts of the Site. key views from within the Site shall be maintained.
- Topography: The majority of development would be located along existing contours avoiding steeper parts of the Site.
- Ponds and streams: Appropriate ecological buffers to ponds and streams will be provided.
 Development within flood zones will be avoided.
- Heritage: The proposals will retain the setting to Great Harwoods Barn and other heritage assets.
- Public Rights of Way: The existing PRoW will be retained on its existing alignment where possible.
- Utilities: An appropriate easement to the sewage pipe which crosses the Site will be provided. Odour associated with the Sewage Treatment Works will be mitigated.
- Ashdown Forest: The scheme will provide Suitable Alternative Natural Green Space (SANG) as mitigation to attract visitors away from the Ashdown Forest at source.



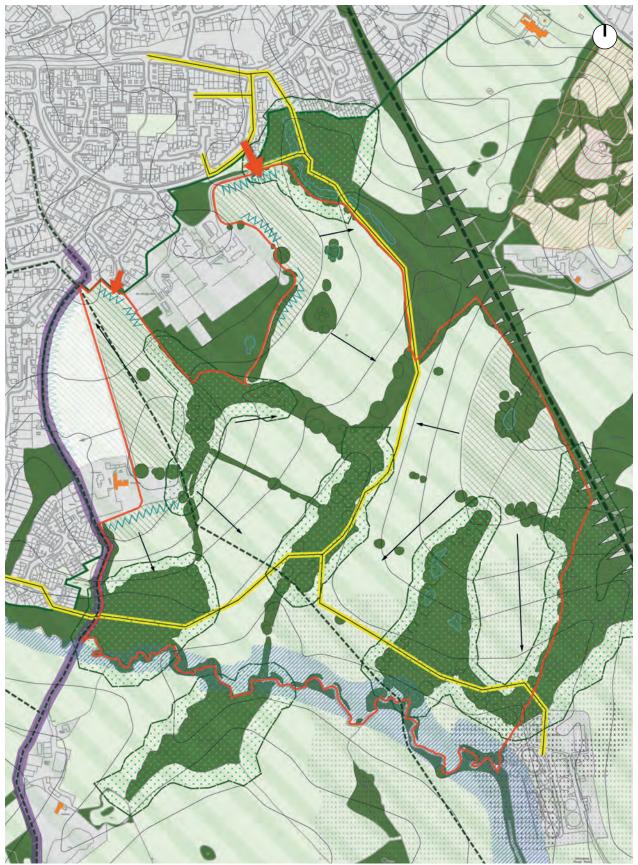
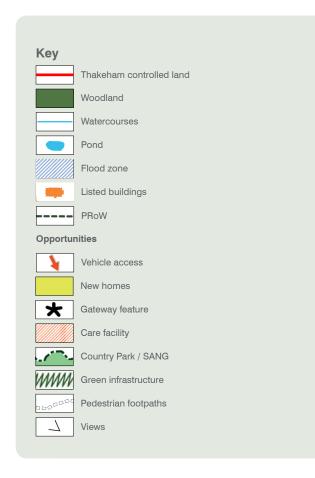


Figure 6 Development challenges

Opportunities

Through consideration of the key issues, opportunities have been identified that will underpin the emerging proposals.

- New homes: The proposals would provide up to 300 new homes with associated infrastructure and public open space. The development would help meet the need for starter homes, family homes and homes for older people.
- Affordable housing: Affordable housing would be policy compliant. A variety of tenures would include social rented, affordable rented and intermediate housing.
- Proximity to existing amenities: Development would be located within parts of the Site that are best related to existing development. This will ensure new residents shall benefit from being part of an established community.
- Country Park / SANG: A Country Park will be located over the wider Site area providing an extensive facility for new and existing residents.
- Community benefits: In addition to the Country Park / SANG community benefits would include homes and facilities for older people and contributions to off-site community infrastructure.
- Children's Play: The housing scheme will include equipped and informal play areas for children of all ages.
- Access: Access into the Site can be easily provided from Stuart Way and Edinburgh Way. Other additional pedestrian and cycle access will also be created.
- Highways improvements: Opportunities to bring forward improvements to the local highway network
- Trees and woodland: Retained trees and vegetation will provide a mature landscape structure
- Wildlife: The proposals will retain, enhance and create new wildlife habitats including meadowland, woodland and wetland.
- **Views:** Key views to the surrounding countryside and the town will be maintained.



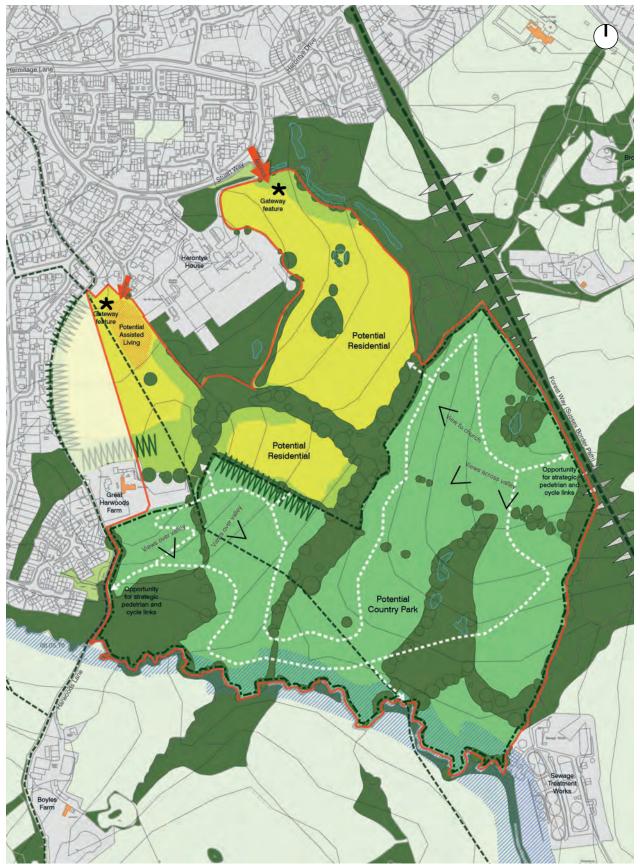


Figure 7 Development opportunities

07 Concept Framework

A high quality residential environment will be created by establishing a clear pattern of streets and public open spaces. Legible pedestrian and cycle links to established communities and the wider movement network will be provided. There will be good access to local facilities and movement networks including the proposed Country Park / SANG and existing Forest Way cycle route. The movement hierarchy will need to respond to the requirements of key users in this order:

- **Pedestrains**
- **Cyclists**
- **Public Transport**
- **Private Cars**

The scale and mix of housing will respond to local need by providing a mix of market and affordable housing with a range of dwelling types and sizes. Public open space at Great Harwoods Farm will benefit from the Site's existing assets which include woodland, mature trees, streams, paths, cycle ways and views and vistas. The extensive Country Park / SANG will provide an exceptional resource for the wider community.





Figure 8 Concept framework

Built form framework

The masterplan framework responds to the topography, watercourses, landscape features, views, local land uses and the established development pattern. The street pattern would provide a finer grain character to the scheme. New homes would overlook mews streets, lanes, public open space and green corridors.

The table opposite provides an initial estimate of potential developable areas for the Site.

LAND USE	AREA	HECTARES	ACRES
RESIDENTIAL	R01	0.77	1.90
	R02	0.41	1.01
	R03	1.57	3.88
	R04	0.60	1.48
	R05	0.87	2.15
	R06	0.43	1.06
	R07	0.44	1.09
	R08	0.47	1.16
	R09	0.40	0.99
	R10	0.58	1.43
	R11	0.51	1.26
	R12	0.57	1.41
	R13	0.17	0.42
	TOTAL	7.79	19.24
ASSISTED LIVING	A13	0.79	1.95

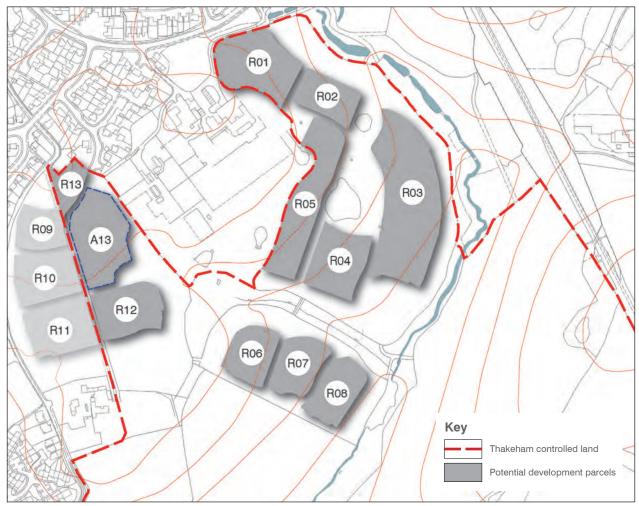


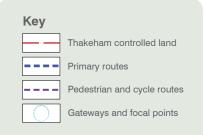
Figure 9 Built form framework

Connectivity and movement

The movement strategy would provide a hierarchy of streets, mews, lanes and footpaths to establish a highly legible development.

Key Principles include:

- Vehicular access from Stuart Way and Edinburgh Way;
- Access to pedestrian and cycle routes that link the Site to the Town Centre, Local schools and the open countryside; and
- A network of permeable streets through the scheme that provide the opportunity for new or existing bus routes to travel through the development.



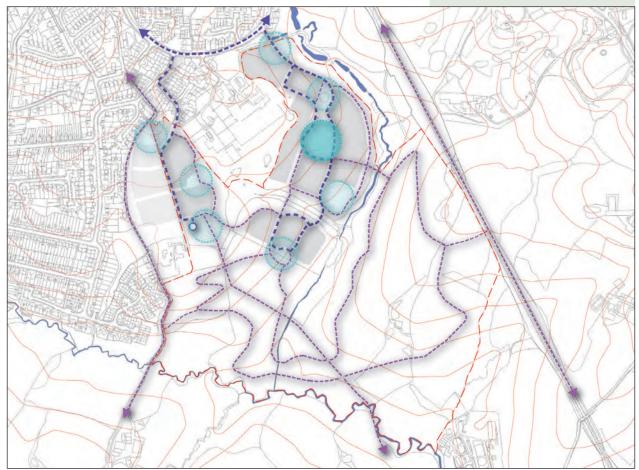


Figure 10 Connectivity and movement

Green infrastructure

Green infrastructure proposals shall retain woodland, trees and provide significant areas of new planting and public open space.

The planting strategy would strengthen the existing pattern of hedgerow and woodland adding to the sense of containment; enhancing wildlife habitats and green corridors. A range of public open spaces would cater for formal and informal play and recreation. These spaces would benefit from existing mature trees and vegetation together with new planting. Open space corridors and green streets would provide attractive routes for pedestrians and cyclists. These routes would connect the Site to the Country Park / SANG and wider network of recreational footpaths, tracks and quiet lanes.

Key Principles include:

- An extensive Country Park / SANG across the eastern and southern parts of the site;
- · Open space and planting parallel to the site contours to retain and reinforce a soft development edge;
- Traditional woodland and pasture management;
- Retention of woodland and important
- Green corridors through the Site; and
- New native tree and shrub planting to augment amenity and wildlife value.

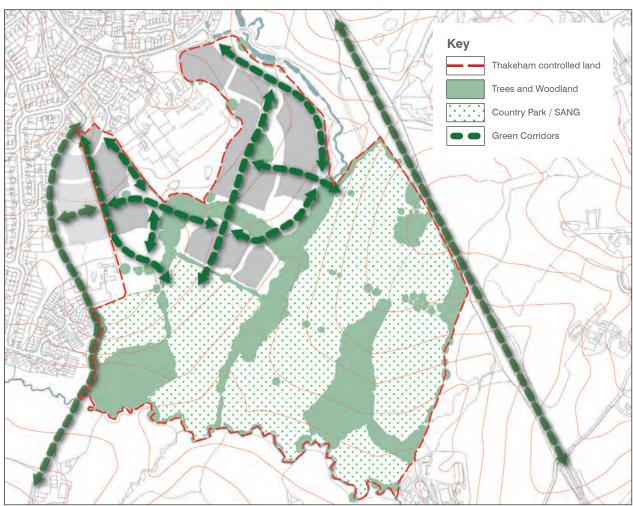


Figure 11 Green infrastructure diagram

Blue infrastructure

Existing watercourses and ponds would be retained with appropriate offsets and buffers. These natural features together with associated areas of woodland and trees provide important wildlife corridors.

The surface water drainage strategy would build upon these existing features. Surface water would be managed using a network of swales, which would connect to new ponds and wetland features. These attenuation features would manage the flow and quality of surface water through the Site.

The plan identifies the likely location and network of attenuation features. Incorporated at an early stage of the design process, SuDS shall be integrated fully with the scheme, establishing new landscape features and habitats as part of the wider landscape strategy.

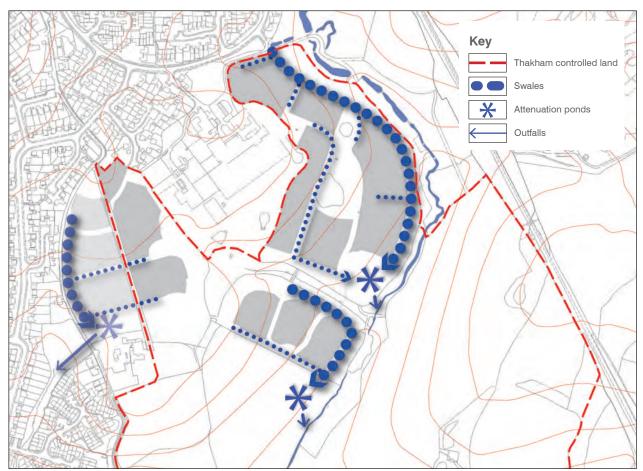


Figure 12 Blue infrastructure diagram

08 Illustrative Proposals

The Illustrative masterplan demonstrates how Great Harwoods Farm could be developed to provide 250-300 affordable and market homes together with community facilities.

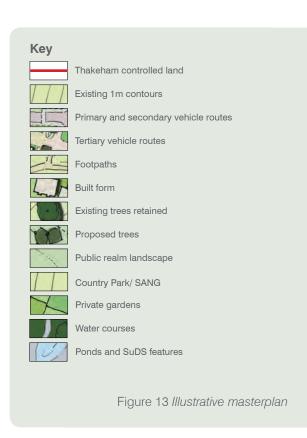








Figure 14 Central neighbourhood key plan

Central neighbourhood

Homes within the central neighbourhood would be focused around a residential Green. A tree lined street would follow the contours of the Site weaving around the Green and a series of other public spaces.

Key features would include:

- · Vehicle access from Stuart Way with pedestrian, cycle and emergency access to Edinburgh Way;
- A series of linked spaces comprising green streets, a central green and pocket parks. These linked spaces would provide wildlife and amenity corridors and soften views of development from within the Country Park / SANG:
- The central green would incorporate a children's play area; and
- · Quiet mews streets, lanes, driveways and footpaths would establish a permeable neighbourhood with views and access to the Country Park / SANG and open spaces.





Figure 15 Central neighbourhood



Figure 16 Community hub and woodland edge key plan

Community hub

It is envisaged that the westernmost site area would become a community hub. The hub would include retirement homes, 'Extra Care' accommodation and assisted living with integrated community facilities and access to the Country Park / SANG.

Key features would include:

- · Vehicle access from Edinburgh Way;
- Direct access to the Country Park / SANG car park and children's play area;
- Care buildings within a landscape setting that reference the character of Herontye House;
- Pedestrian and cycle links that incorporate the existing Public Right of Way; and
- Extensive Green Infrastructure buffer to Great Harwoods Farm.

Woodland edge

Housing on the southern edge of the development would be characterised by quiet lanes and driveways within a woodland setting. Connecting woodland paths would provide links to the Country Park / SANG and adjacent neighbourhoods.





Figure 17 Community hub













Country Park / SANG

The Country Park could provide over 30ha. of SANG.

The Park would be designed and managed to encourage wildlife and amenity value. Features would include a SANG walking loop of over 2.3km; seating and viewing areas; and links to the wider network of foot and cycle paths.

Key features would include:

- · Planting to restore ancient field patterns and link wildlife corridors;
- · Woodland management of coppice with 'standards';
- Grassland management to establish species rich meadows;
- A surfaced footpath with alternative mown grass paths; and
- · Access to and from the Forest Way and Harwoods Lane.



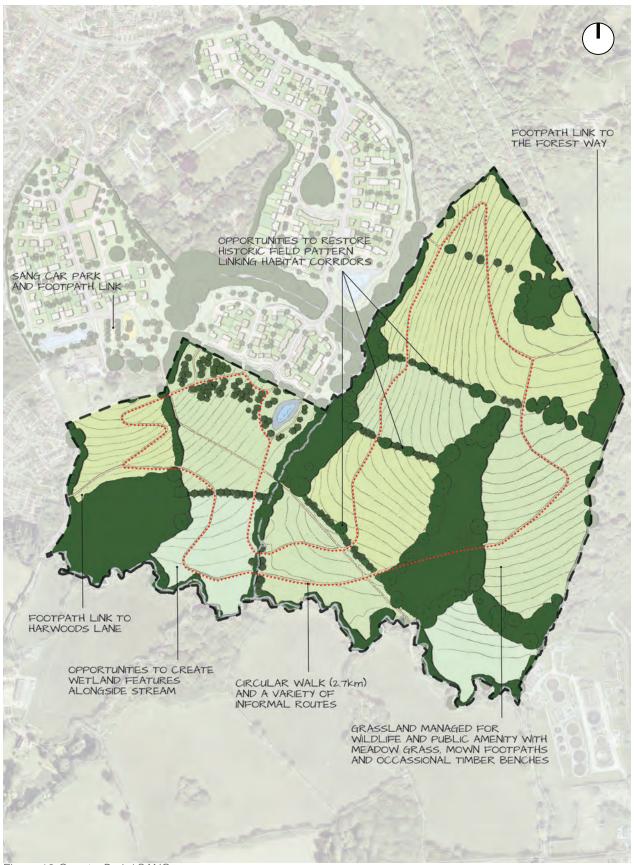


Figure 18 Country Park / SANG

09 Economic and Community Benefits

The proposals will support sustainable economic development in East Grinstead. Up to 300 new homes could help stimulate economic growth, reduce the impact of local authority budget cuts and assist in meeting East Grinstead's housing needs.



New Homes

250-300 new homes would provide a mix of size, type and tenure including starter homes and homes for older people.

It is anticipated the development would deliver:

- 30% affordable housing;
- 25% retirement homes; and
- 25% assisted living.



Jobs

Jobs created by the development would have a significant benefit to the local economy.

Construction Jobs

- 75-90 Jobs per year through direct employment. The proposals are estimated to create 300-360 person years of temporary construction employment over a 4 year build
- 113-136 Jobs per year through indirect/ induced employment.

Operational Jobs

 Jobs would also be created by a Care Facility, management of the Country Park / SANG and other public open spaces.

Expenditure

Local shops and services would benefit from increased expenditure by the new community which would in turn support new local jobs

- £1.25- 1.5m in first occupation expenditure. On goods and services to make a house 'feel like home' a proportion of which would be captured locally.
- £2.5- 3m estimated additional residential expenditure per annum within local shops and services.



Local Authority Revenues

The scheme would contribute to local authority revenues a proportion of which would be invested in the community.

- £2.5-3m New Homes Bonus to Mid Sussex District Council over a 6 year period.
- £390,000-470,000 estimated additional Council Tax Revenues (per annum).
- Community infrastructure and other planning contributions based on viability, local policy and CIL provisions.



10 Summary

New homes at Great Harwoods Farm would be provided within an exceptional environment for new residents and the wider community to enjoy.

The proposals would deliver the following benefits for East Grinstead and the wider community:

- The Site could accommodate up to 300 high quality new homes;
- A mix of housing size, type and tenure including affordable housing would be provided;
- The scheme would deliver an extensive Country Park / SANG to reduce visitor pressure upon the Ashdown Forest SPA;
- An efficient use of land would ensure the scheme is well integrated with the existing community and nearby facilities;
- New community facilities such as a care home could be provided on Site;
- A network of open space would provide connections to a wider network of pedestrian and cycle routes;
- A robust landscape framework would reinforce East Grinstead's green edge;
- Around 200 direct and indirect jobs would be created during construction;
- The scheme would contribute to a significant increase in local authority revenues;
- The Site is available now and would help meet the immediate housing need; and
- Great Harwoods Farm would be a welcoming place where streets overlook public open spaces with opportunities for people to meet and socialise.



BRADLEY MURPHY DESIGN LTD

5 The Courtyard Hatton Technology Park Dark Lane Hatton Warwickshire CV35 8XB