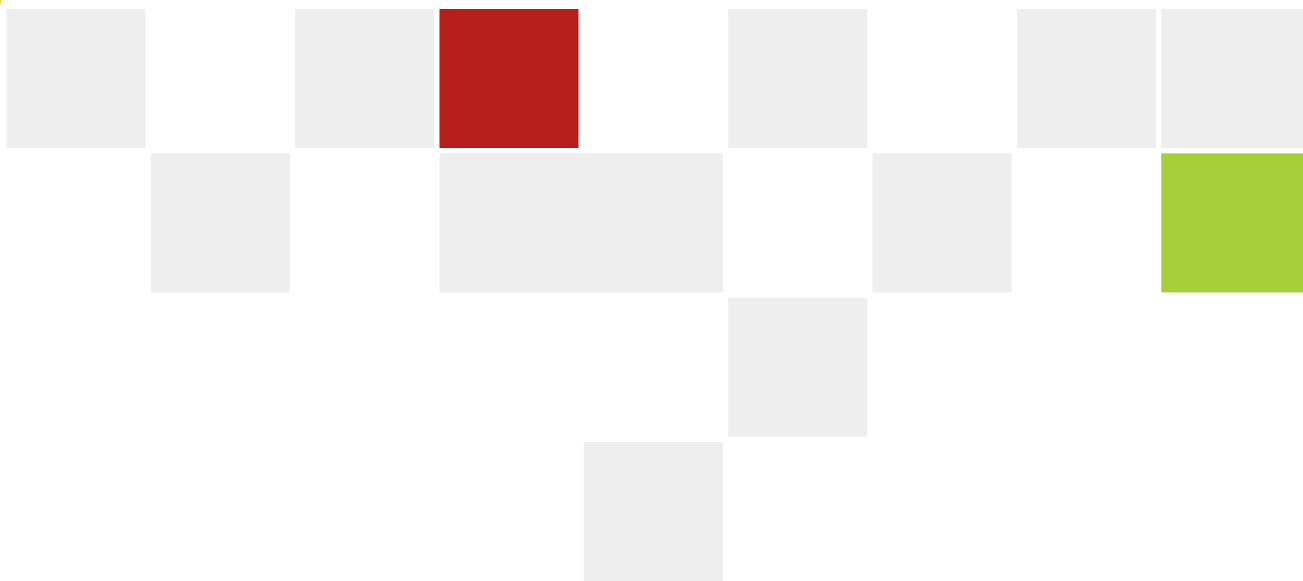


Land South of Crawley Down Road, Felbridge

Site Allocation DPD Representations (Reg 19)



Boyer

Report Control

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1. INTRODUCTION

- 1.1 This document has been prepared on behalf of Barratt Developments Plc in respect of land south of Crawley Down Road, Felbridge. The site is identified as a proposed housing allocation within the Council's emerging Site Allocations DPD (Regulation 19) capable of delivering 200 new homes together with associated areas of open space (Policy SA19).
- 1.2 Barratt Developments has a controlling interest over the whole of the allocation site, extending to approximately 8.5Ha (20.4 acres). The site location is shown below. These representations follow those made at the Regulation 18 stage and demonstrate that the site's allocation would form part of a sound spatial strategy for Mid-Sussex.



2. BACKGROUND

Site and Surroundings

- 2.1 The site currently comprises of a series of 3 fields to the rear of existing residential development and sports fields that front onto Crawley Down Road. The boundaries of the site are formed by well-established landscaping whilst Felbridge Water runs along the site's southern boundary. An existing bridleway (40aEG) bisects the site in a north south direction and provides a connection between Crawley Down Road and other public rights of way to the south. Existing gated access is provided between the site and this bridleway. The site also includes no.71 Crawley Down Road which would provide the main point of access.
- 2.2 The majority of the site falls within Flood Zone 1 (lowest risk) whilst a small part of the southern part of the site, closest to Felbridge Water, falls within Flood Zones 2/3. In addition, it is not within a conservation area and does not include any heritage assets.
- 2.3 The main part of the site falls within Mid-Sussex District Council and West Sussex County Council whilst a small part, closest to Crawley Down Road, is within Tandridge District Council and Surrey County Council. The site is also within the administrative area of East Grinstead Parish Council.

Planning Context

- 2.4 We have promoted the site on behalf of Barratt Developments since 2017. In November 2019, we submitted representations to the Regulation 18 version of the Site Allocations Plan supporting the site's proposed allocation based on the technical work undertaken, which included a vision document for new development at the site. Since then we have continued our positive engagement with key stakeholders, most notably WSCC Highways, which has enabled us to further progress with preparing the supporting technical work. This work has been shared with MSDC and forms part of the library of documents supporting the site's allocation. These representations do not seek to repeat information contained within these documents or our earlier Regulation 18 representations, rather they seek to demonstrate that the site's inclusion as an allocation for 200 new homes forms part of a sound spatial strategy having regard to the relevant tests set out within the NPPF.

3. SITE ALLOCATION SA19

Positively Prepared

- 3.2 The District Plan identifies a minimum housing requirement of 16,874 for the Plan Period (2014-31), of which there is residual requirement of 1,280 homes to be met through the Site Allocations Plan. The spatial distribution is based on the Council's settlement hierarchy with East Grinstead, along with Burgess Hill and Haywards Heath, at the top of this hierarchy. In order to deliver sustainable development, a key aim of the NPPF, it is evident that new housing should be focused in and around these settlements.
- 3.3 Policy SA10 identifies a current residual housing requirement for these towns of 706 new homes with the Plan proposing the allocation of sites sufficient to deliver 1,409 new homes in and around these towns. All of the proposed allocations, as a whole, would deliver a total of 1,764 new homes.
- 3.4 As such the Site Allocations Plan would deliver approx. 500 more homes than required by the District Plan however for a variety of reasons this is considered entirely appropriate. The housing requirement set out in the District Plan is a minimum requirement and should therefore be seen as a 'floor', not a 'ceiling'. The provision of a buffer provides flexibility and certainty that the housing requirement can be met should, for unforeseen reasons, the delivery of housing from one or more allocated sites be delayed.
- 3.5 Mid-Sussex, in common with the majority of other authorities in the South East, has an increasing affordability issue. Home ownership in the District continues to be beyond the reach of many people with the price of new homes currently between 13-14 times average earnings (a rate double the average for England), as illustrated by data from the ONS contained within the following table:

House price to workplace earnings ratios ¹	2016	2017	2018	2019
Ratio of median house price to median gross annual workplace-based earnings (MSDC / England)	12.61 / 7.72	12.60 / 7.92	12.68 / 8.04	13.01 / 7.83
Ratio of lower quartile house price to lower quartile gross annual workplace-based earnings (MSDC / England)	13.95 / 7.16	13.19 / 7.26	12.98 / 7.34	13.80 / 7.27

¹<https://www.ons.gov.uk/peoplepopulationandcommunity/housing/datasets/ratioofhousepricetoworkplacebasedearningslowerquartileandmedian>

- 3.6 The continuing high cost of new homes is reflected in the latest SHMA (2014) which identifies an annual need of up to 474 new affordable homes. Even on the assumption that 30% of all new housing based on the annual requirement of 1,090 new homes (which applies from 2024/25) is affordable (327 homes per annum) then there will remain a considerable unmet need. This in large part explains why the proposed housing requirement for the District based on proposed changes to the standard methodology is expected to increase to 1,305 new homes per annum.
- 3.7 For all of the reasons set out above, it is evident that there is and continues to be a growing need for new homes in the District. The proposed allocation of sites in and around the District's main towns, exceeding the identified minimum housing requirement, is illustrative of the Council seeking to be positive in its planning for new homes.

Justified

- 3.8 A significant amount of work has been undertaken by both the Council and Barratt Developments to support the proposed allocation.
- 3.9 As set out within our previous representations, information was provided on the site sustainability whilst work had been undertaken to inform the proposed means of access and understand the associated highways impact. Since then, further engagement has taken place with the highway authority which has led to the assessment methodology being agreed. Based on this it is considered that the proposed development would have a negligible impact on the operation of the highway network. Furthermore, the proposed development provides an opportunity to improve public transport services in the local area. Improvements could include the funding to upgrade nearby bus stops near the site with real time information and contributions towards providing a new bus lane southbound along the A22 to give bus priority to East Grinstead (the scheme of which has already been designed). A safety audit of the proposed means of access has been carried out and proves that a safe access can be provided. This highways work forms part of the library of information published by the Council.
- 3.10 In light of the fact that the site currently comprises of open fields, ecological survey work has been undertaken which considers the potential impact on both site and off-site ecological receptors as well as addressing relevant comments made at the Regulation 18 stage. In summary, it is considered that the features of ecological interest are located around the site boundaries and so it is readily achievable to develop a sensitive layout which retains and buffers these areas. At this stage, effects of development on designations in the wider area are either unlikely or there are already measures in place to deliver mitigation (e.g. via SANG/SAMM developer contributions). Furthermore, significant opportunities exist for enhancements to biodiversity, in the form of habitat creation and enhancement measures, provision of additional opportunities for faunal species and by bringing the site into long-term management to benefit biodiversity. Likewise, the arboricultural and flood work prepared does not identify any issues that a sensitively designed layout couldn't overcome as illustrated by the concept layout contained within our supporting vision document.

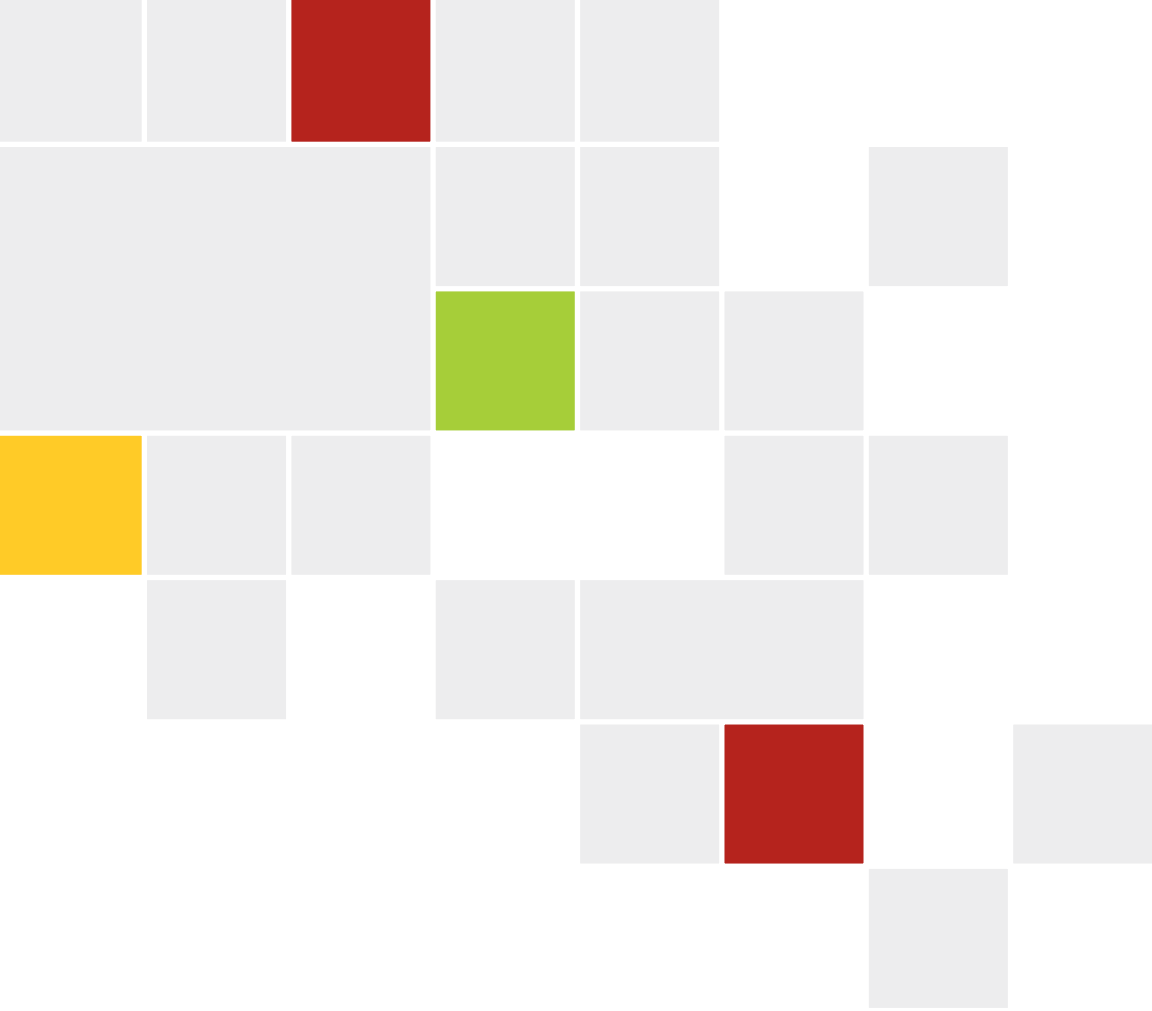
- 3.11 The site, along with SA20 to the south, represent the only proposed major growth area to East Grinstead. East Grinstead is a key town in the District providing a wide range of services and facilities whilst such facilities sufficient to meet the day to day needs of residents are also provided within Felbridge (as set out within chapter 3 and figure 3.3 of the supporting Transport Assessment). The surrounding footpath, cycle and bus network means that residents will be able to access these without relying on the private car. On this basis, it is considered that the site is a sustainable location for new residential development, the good accessibility of this general location being acknowledged by the Inspector considering a recent appeal approximately 150m east of the site (see paragraph 46, PINS ref: 3205537).
- 3.12 In summary, the proposed allocation has been clearly justified and would contribute towards the delivery of sustainable development, a key objective of the NPPF.

Effective

- 3.13 Barratt Developments, who have control of the whole site, are a recognised national housebuilder capable of implementing the subsequent planning permission at the site. A development of 200 new homes at the site is viable when taking into account the policy requirements of Policy SA19, other relevant policies (e.g. affordable housing) and contributions necessary to mitigate any impact of the development. On this basis, it is considered that new development is capable of being delivered within the first 5 years, following adoption.

4. CONCLUSIONS

- 4.1 Barratt Developments has a controlling interest over the whole of the SA19 allocation site, which extends to approximately 8.5Ha (20.4 acres).
- 4.2 The site has been promoted for residential development since 2017 with a significant amount of work undertaken to inform its proposed allocation for 200 new homes. This work is contained within the evidence base and library of documents supporting the site's allocation.
- 4.3 In line with tests set out within the NPPF, it is considered that the site's allocation would form part of a sound spatial strategy for new development in the District up to 2031 that is positively prepared, justified and effective.
- 4.4 In light of this, we fully support the continued inclusion of the site within the emerging Site Allocation Plan and its delivery within the first 5 years of the Plan period.



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