



Planning Policy
Mid Sussex District Council
Oaklands House
Oaklands Road
Haywards Heath
RH16 1SS

Date 28 September 2020
Your ref SA20
Our ref 0704/296724-8

Dear Sirs

**Mid Sussex Site Allocations DPD Regulation 19 Consultation
Land south and west of Imberhorne Upper School, East Grinstead – Policy SA20
On behalf of Welbeck Strategic Land (II) LLP**

DMH Stallard LLP act on behalf of Welbeck Strategic Land (II) LLP (“Welbeck”) in relation to the promotion of land west of East Grinstead (also known as land at Imberhorne Farm), allocated at policy SA20 of the Regulation 19 Site Allocations DPD (“SA DPD”). Welbeck wholly support the inclusion of the site within the SA DPD; it accords with the strategic policies of the District Plan and is based on robust evidence base. We therefore submit that policy SA20 is sound, in accordance with the tests set out in the NPPF.

Welbeck and DMH Stallard have consulted with Mid Sussex District Council (MSDC), West Sussex County Council (WSSCC) and East Grinstead Town Council (EGTC) for some time, to bring forwards an appropriate proposal for the land west of East Grinstead, that delivers against the housing need for East Grinstead, including the need for housing for older people, whilst also providing for wider infrastructure needs such as the provision of secondary, primary and early years education, GP provision and a Strategic SANG (Suitable Alternative Natural Green Space).

It is recognised that there are local concerns that the proposal is, in part, are contrary to the East Grinstead Neighbourhood Plan (EGNP), Welbeck wholly support neighbourhood plans as an important part in shaping communities and delivering against local development needs. However, the EGNP was adopted in 2016, prior to the adoption of the District Plan in 2018, and as such, it does not reflect the latest calculation of housing, or other, needs. The EGNP does however, at policy SS8 promote public open space, including SANGS, playing fields, allotments and cemetery on land west of Imberhorne Farm, the proposal delivers against the majority of these uses. Furthermore, it has the ability to release land at Imberhorne School, Windmill Lane, as allocated at Policy SS3 for housing development. As such, the proposal

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seeks to unlock allocations within the EGNP whilst also meeting housing needs as identified in the higher order District Plan.

Policy SA20 - A Sustainable, Healthy Community for East Grinstead

Policy SA20 allocates the land west and south of Imberhorne Upper School (Imberhorne Farm) for a range of uses that will deliver a new sustainable community for East Grinstead, reducing the need to travel through significant on-site opportunities, but also benefiting from connectivity to the existing area through good bus links and footway / cycleways such as the Worth Way. The allocation will deliver against the identified housing need for East Grinstead and Mid Sussex, as adopted in the District Plan, boosting housing in accordance with the NPPF.

Welbeck are committed to the delivery of the proposal as set out in Policy SA20 and wholly support the Council's identification of the site through the Local Plan process, acknowledging the significant evidence base that has been undertaken and shared with the Council. It also reflects significant site assessment which has been undertaken by the Council at site level and strategically, particularly in relation to transport and highway capacity.

In summary and as defined by Policy SA20, Welbeck are committed to delivering:

- Approximately 550 dwellings, including 30% affordable housing;
- A Care Community;
- Land for a 2FE primary school and early years provision;
- 4ha (net) of land for expansion and consolidation of Imberhorne Secondary School;
- Local centre, including GP provision;
- Public open space; and
- 40ha of Strategic Suitable Alternative Natural Greenspace (SANG).

At present, the Concept Masterplan is in draft form, however this is enclosed within these submissions. It is based on the significant evidence base undertaken so far and considerable consultation with the Council to date. As such, it is considered to be a sound approach to masterplanning for all the proposed uses, demonstrating deliverability of the scheme.

The evidence base has been submitted to MSDC throughout the process, from initial site submission through to the Council's Regulation 19 'Site Library'. Welbeck commend the Council for sharing a suite of 'Site Library' documents, to share the evidence base with members of the public in the interests of transparency. The latest documents are submitted alongside these representations and include:

- Concept Masterplan 2020
- Care Community Capacity Sketch Layout 2020

- Vision Document 2020
- Landscape and Visual Impact Appraisal 2020
- Transport Appraisal 2020
- Heritage Statement 2020
- Flood Risk and Drainage Strategy 2020
- Ecological Report 2020
- Care Community Demand Study 2019

These reports, combined with MSDC's own evidence base, demonstrate that the site is suitable for development, and should be read alongside these representations.

The District Plan did not allocate any housing in East Grinstead notwithstanding it being a Category 1 settlement. It is acknowledged that the EGNP allocates some sites for housing (including land at Imberhorne Lower School), but the District Plan followed the EGNP and identifies a minimum residual housing requirement (post 2017) of 1,145 for East Grinstead. The residual housing need has been revised as part of the SA DPD process to account for further commitments and the Sustainability Appraisal supporting the SA DPD (February 2020) states that the revised residual housing figures for East Grinstead is 706 dwellings (paragraph 6.31 – Table 13).

East Grinstead is a Category 1 settlement, as defined by policy DP6 of the District Plan, which recognises it as a *“Settlement with a comprehensive range of employment, retail, health, education, leisure services and facilities. These settlements will also benefit from good public transport provision and will act as a main service centre for the small settlements.”*. The Sustainability Appraisal (SA) supporting the Regulation 19 document recognises that the SA DPD should plan for at least the residual housing need. Furthermore, that in accordance with Policy DP4, the residual requirement should be spatially distributed in general accordance with the established settlement hierarchy, this approach was found sound through the District Plan process and we support the Council's continued application of the spatial distribution of housing. The allocation of land at Imberhorne Farm (policy SA20) will contribute towards that residual need of the district, and of East Grinstead (c706 dwellings) and in accordance with the settlement hierarchy.

Acknowledging that there is a residual housing need in Category 1 settlements, all of which arises from an unmet need in East Grinstead, the Council have rightly considered all options for development around the town. However, there are few remaining directions in which to expand the town without impinging on nationally protected areas. The land west of East Grinstead is one of the least environmentally constrained areas around the town; land to the north (within Tandridge District) is Green Belt and land to the east and south forms part of the High Weald Area of Outstanding Natural Beauty (AONB). Furthermore, the Council's landscape evidence base comprising the 'Capacity of Mid Sussex District to Accommodate Development 2014' and 'Landscape Capacity Study 2007', identifies land to the west of East Grinstead as one of only 3 locations within the District considered to have Medium /

High capacity for development. As such, there are very few locations to meet the residual housing need, and land at Imberhorne Farm has the capacity to accommodate development without an impact on nationally protected areas, on a site which is relatively unconstrained.

Paragraph 72 of the NPPF acknowledges that the supply of new homes can often be best achieved through planning for larger scale development, such as extensions to towns, providing that they are well located and designed. East Grinstead is a Category 1 Settlement, and the only top tier settlement in the north of the District, it is therefore a highly sustainable settlement. Furthermore, the NPPF acknowledges that this is often a way of meeting needs in a sustainable way, such proposals are able to:

- a) consider the opportunities presented by existing or planned investment in infrastructure, the area's economic potential and the scope for net environmental gains;*
- b) ensure that their size and location will support a sustainable community, with sufficient access to services and employment opportunities within the development itself (without expecting an unrealistic level of self-containment), or in larger towns to which there is good access;*
- c) set clear expectations for the quality of the development and how this can be maintained (such as by following Garden City principles), and ensure that a variety of homes to meet the needs of different groups in the community will be provided;*
- d) make a realistic assessment of likely rates of delivery, given the lead-in times for large scale sites, and identify opportunities for supporting rapid implementation (such as through joint ventures or locally-led development corporations); and*
- e) consider whether it is appropriate to establish Green Belt around or adjoining new developments of significant size.*

In accordance with this criteria, Policy SA 20 will deliver a sustainable community, with sufficient access to services and employment. The proposed development will deliver a range of additional land uses in addition to the 550 dwellings proposed, including; land for a primary school (and early years provision), land for expansion of Imberhorne Secondary School, a Care Community (housing for older people), and significant open space including a Strategic SANG. The development will provide social and economic opportunities within the proposal itself, as well as being well located close to existing employment opportunities (Birches Industrial Estate and the Town Centre).

The development will also promote healthy communities, as required by Section 8 of the NPPF. Paragraph 91 of the NPPF requires that policies should aim to achieve healthy, inclusive and safe places, the development of land west of East Grinstead, will deliver against these objectives as follows:

- It will promote social interaction, including opportunities for meetings between people who might not otherwise come into contact with each other, through the delivery of primary and secondary education, mixed housing tenures and housing for older people (paragraph 91 of the NPPF).
- The scheme will deliver additional early years, primary and secondary education on the site, to meet the needs of the local area as well as the need arising from the proposal itself (paragraph 94 of the NPPF).
- It will reduce the need to travel by car. The site is well linked to existing bus routes and is within walking/cycling distance of a Train Station. It will include significant opportunities for new footways and cycleways, linking the site to the Worth Way and other existing routes and will promote active travel (paragraphs 91 and 98 of the NPPF)
- It also has a range of uses on the site, which will reduce the need to travel, including a local centre, education and employment needs and is close to existing employment opportunities, and a wider range of local shops.
- The significant open space, including strategic SANG, totalling over 50ha will provide opportunities for healthy lifestyles such as walking and cycling, it will also promote social interaction. The additional land for Imberhorne Secondary School will provide superior sports provision for the School, but will also be available for use by the wider community (paragraph 96 of the NPPF).
- The local centre and Care Community provides an opportunity to deliver new health care services to the west of East Grinstead (subject to local need, defined by the CCG) (paragraph 91 of the NPPF).

Importantly, the proposal delivers much more than simply standard housing to meet the residual housing needs of East Grinstead and the wider area, it delivers a suite of additional benefits to deliver a new sustainable community. The details of the proposal are outlined below, and reflect the Council's criteria as set out in Policy SA20.

Access

The main scheme access will be via Imberhorne Lane, through the creation of a new junction with Heathcote Drive. In addition, there is a secondary point of access for the Care Community and for emergency vehicles only, to the south of the main access point, also onto Imberhorne Lane. This has been subject of assessment by West Sussex Highways Authority, who are in agreement with the design and approach to site access.

Meeting the needs of Imberhorne Secondary School

The proposal will deliver an additional 4ha (net) of land to Imberhorne Secondary School, enabling the consolidation of Imberhorne School campuses as identified within the EGNP at Policy SS3.

Imberhorne Secondary School is currently split across 2 sites over 1.5km apart. Lower School, which serves School Years 7 – 9, is on Windmill Lane and Upper School is on Imberhorne Lane, and serves School Years 10 – 13. The Lower School site is allocated within the EGNP (Policies EG6 and SS3) for c200 dwellings and is therefore included within the MSDC housing trajectory for the delivery of housing across the plan period.

The Lower School is in need of significant investment, but there are also management and financial issues arising from having split school sites, including onsite administration, commuting of teaching staff between the campuses, but also the availability of facilities to all students. WSCC and Imberhorne School have long been committed to consolidating the school campuses on the Imberhorne (Upper) Lane site, as outlined in the EGNP. Welbeck have worked with WSCC to agree a land swap which would provide a net increase in school land of 4ha, to include enhanced sports facilities and allow for consolidation of the school sites onto the Imberhorne Lane site. The land swap will also provide a second point of access to the wider site, which can also serve the new school facilities which will be made available to the wider community.

Therefore, the delivery of policy SA20, enables the consolidation of Imberhorne School campuses to include significant enhanced, modern facilities as well as the release of land at Imberhorne Lower School for housing, in accordance with the EGNP (policies EG6 and SS3) and the MSDC housing trajectory. As such, the proposal not only delivers enhanced secondary educational facilities, but it provides c550 dwellings towards the residual housing need and unlocks the c200 dwellings already allocated in the EGNP. It also accords with the approach set out in the NPPF (paragraph 94) which highlights the importance of providing a sufficient choice of school places to meet the needs of existing and new communities, taking a collaborative approach to meeting this requirement.

2FE Primary School and Early Years Provision

The proposal will deliver c2.2ha of land for a new two form entry primary school and early years provision. It is acknowledged that due to the expansion in population, local school are nearing capacity, additionally, the development itself will generate a need for more school spaces. As such, to meet these needs, which have been confirmed by West Sussex County Council, and ensure the needs of future generations are met, the proposal will deliver land for a 2FE entry primary school.

The Concept Masterplan seeks to deliver the school in initial phases of the proposal, adjoining the existing built up area boundary (BUAB) and existing residential development. It is also located close to the new playing fields for Imberhorne Secondary School, to enable sharing of the sports facilities if appropriate. Furthermore, the siting of the school also provides an active entrance to the development whilst providing a green buffer between built form and the listed buildings of Imberhorne Farm.

Community Hub

The proposal will deliver a small mixed-use community hub at the entrance to the site. The mixed-use hub can deliver a range of community facilities to meet the needs of the development and the wider area, including a GP surgery, as outlined in Policy SA20. East Grinstead currently benefits from only three GP surgeries, all of which are on the east of the town, the inclusion of a GP surgery within the site will offer health care provision on the west of the town to both existing and future residents. It is intended at this stage, that the mixed-use hub could provide a range of community uses, whilst ensuring that it does not detract from other local shopping parades.

Care Community

A Care Community is proposed in the south east parcel of the site, it will have a direct access onto Imberhorne Lane (although it is proposed that further access into the site will be for emergency vehicles only). The proposals, at this stage, are indicative, but a draft scheme layout is enclosed, this will provide a mix of extra care and independent care dwellings all at a maximum of two storeys.

The indicative proposal will deliver a total of 141 units, of which 109 would be defined as 'extra care' and 32 'independent care', both fall within Use Class C2.

A Demand Study has been produced by Avison Young (enclosed), this identifies that the population of 65 and over, is expected to increase 12.1% between 2017 and 2022, within a 10 mile radius of the site. Additionally, the report identifies a total need for extra care of 1,827 dwellings but a supply of only 165 dwellings in the catchment of the site. As such, there is a significant unmet need for extra care housing within the site area. Additionally, the Council acknowledge within the HEDNA, and through policy DP25 of the District Plan, that there is a need for specialist housing for older people, that would be met through the SA DPD.

Paragraph 61 of the NPPF requires that the housing needs of different groups, including older people, should be assessed and reflected in planning policies. The Planning Policy Guidance has a number of paragraphs on the importance of planning for the needs of older people. It acknowledges that people are living longer and the proportion of older people in the population is therefore increasing. It therefore states that *"Offering older people a better choice of accommodation to suit their changing needs can help them live independently for longer, feel more connected to their communities and help reduce costs to the social care and health systems."*

The Council have undertaken an assessment of housing needs for older people through the HEDNA Addendum 2016 supporting the District Plan. The HEDNA Addendum identifies shortfalls (at 2014) for nearly all types of housing for older people, including Sheltered

Housing (Independent living) (-9%), Enhanced Sheltered Housing (Independent Living) (-61%) and Extra Care provision (-36%). Additionally, the Demand Study undertaken for Welbeck, by Avison Young, and enclosed herewith, expands on that assessment, demonstrating the extent of housing need for older people within the broad locality of the site.

The NPPF and PPG place great weight on ensuring that the housing needs of all groups are met, including housing for older people. The delivery of a care community on the site, through Policy SA20, will deliver towards this current unmet need, particularly in the absence of alternative site provision.

Strategic SANG, Public Open Space and Allotments

The proposal will deliver a Strategic SANG of c42 hectares to the west, beyond the north/south track between The Gullege and Felbridge (locally known as 'The Gullege'). The Strategic SANG has been designed by specialist consultants (Barton Willmore – Landscape, and Ecology Partnership – Ecology) and in consultation with MSDC to ensure that it provides the appropriate environment in accordance with Natural England's guidance, including a circular walk of 3km. It provides a wildlife pond, additional native tree and scrub planting, a wildflower meadow and points of interest including a possible look out tower and benches. The proposed SANG masterplan is shown on the Concept Masterplan.

The 3km walk will also connect to a wider network of public rights of walk, including 'The Gullege' towards Felbridge, the Imberhorne Farm track, within the green corridors to be provided within the site, and also towards the Worth Way, a linear Country Park. As such, there are myriad of opportunities for walking in addition to onsite provision.

The provision of 42ha is considerably in excess of that required by the development itself. The Strategic SANG will provide mitigation against recreational activity on the Ashdown Forest Special Protection Area (SPA), encouraging existing and future residents to use this area for recreation and dog walking. It provides mitigation for the proposed development, but also for schemes in the north of the District, enabling continued housing growth against the identified housing needs, whilst ensuring the continued protection of the Ashdown Forest SPA. Therefore, complying with national and local planning policy and the relevant environmental legislation.

The scheme has also been designed to provide significant formal and informal open space and green corridors throughout the site, which is identified in the EGTC at policy SS8. Furthermore, the provision of a SANG to the west of the development safeguards against further encroachment of development in this location, protecting from coalescence with Crawley Down beyond. This can be used by existing and future residents. This will include children's play space, an equipped area of play and allotments.

Delivery

Welbeck support the Council's identification of the timescales for development of the proposal. Welbeck have undertaken significant site assessments which could support a planning application at the earliest opportunity, there are no constraints to the delivery of the site in the 1 – 5 year plan period.

Furthermore, there is a pressing need to deliver the site to enable the expansion and consolidation of Imberhorne Secondary Schools onto the Imberhorne Lane site, which can only be realised through the release of the land identified through Policy SA 20. Any delay to the release of the site would result in future deterioration of the facilities and therefore education provision at the Imberhorne Lower School site, as well as a delay to the release of that site for housing, as set out in the EGNP. The early delivery of the school proposals will also unlock the development of land at Imberhorne Lower School, as identified within the EGNP, which is also critical to housing delivery in the plan period.

Policy SA20 amendments

Welbeck acknowledge the considerable work undertaken by MSDC to produce the SA DPD and the detailed policies within it. Welbeck also welcome the amendments to the policy arising from the Regulation 18 consultation. However, we still have concern with the reference to the possible provision of plots for Gypsies, Travellers and Travelling Showpeople.

Policy SA20 will deliver significant local infrastructure over and above that normally required of a site of this size and significantly more than other sites within the District Plan and SA DPD. Whilst this is a reflection of local infrastructure needs, any further district level infrastructure provision puts at risk the viability of the site and would place onerous burden on the proposals.

Furthermore, detailed masterplanning of the site has been undertaken, which shows how the proposed uses can be assimilated onto the site. The masterplanning to date, does not account for land for gypsies, travellers and travelling showpeople and it is questioned how this could be delivered on the site in a satisfactory way without the loss of other land uses proposed through the policy requirements. Welbeck therefore object to the inclusion of this provision through policy SA20.

MSDC SA DPD Evidence Base

SHELAA Site Assessment (Site Ref. #770)

Welbeck have undertaken a suite of site assessments which have been shared with the relevant statutory consultees, including the District Council as part of the Call for Sites, the

Regulation 18 Consultation, Site Allocation Library and throughout the process of site promotion. The latest site assessment, submitted to the Council as part of the Site Allocation Library (in addition to the Concept Masterplan and Vision Document), and contained herewith includes:

- Highways Appraisal
- Landscape and Visual Impact Appraisal
- Ecology Report
- Flood Risk and Drainage Strategy
- Heritage Statement

Tree surveys have also been undertaken, but as trees and hedgerows are confined to field boundaries and will be largely untouched by the development, they are not enclosed as they are also large documents. However, they have been made available to the Council at earlier stages of the site promotion process, and can be made available again if necessary, but it is welcomed that the Council acknowledge in the SHELAA that trees are not a constraint to development.

The above site assessment has enabled MSDC, their external consultants and statutory consultees to make an informed assessment of the site through the SHELAA process, which Welbeck largely support as a detailed and sound appraisal of the suitability of the site for development. Welbeck support the robust SHLEAA process, the Council commenced with early engagement with developers and the public on the methodology prior to commencing the site selection process. The Council have then undertaken a number of steps (a 'sifting' exercise) to determine whether sites are compliant with the strategic policies of the District Plan and then assess individual sites for suitability.

As part of the sifting exercise, the Council identified a short list of 51 sites (as set out in the Sustainability Appraisal 2020), the land west of Imberhorne Lane (SHELAA #770) is included within this short list. The site assessment process then goes further within the SA process both individually and in comparison with other sites.

Generally, Welbeck support the SHELAA assessment of the site, which concludes that the site offers considerable development potential. Additionally, we welcome the acknowledgement of infrastructure improvements that are associated with the proposals, most notably, the secondary school, primary school (and early years), GP, housing for older people and a Strategic SANG. However, Welbeck object to parts of the site assessment which do not reflect the in-depth site assessment undertaken, nor the amendments that have been carried out throughout the site promotion process and in conjunction with the Council, which has resulted in an amendment to the site boundary. These include:

1. Ecology

The site assessment suggests that Natural England have concerns regarding high density housing south of Felbridge, however, those representations are a collective response to wider land at Imberhorne Farm (site #770), a site in Crawley Down (site #686) and the additional land at Imberhorne Farm (site #561), which is proposed as a Strategic SANG and not for housing development. Given that the SHLEAA capacity of these sites collectively is 2,800 dwellings, we strongly object to the assessment and advice of Natural England and its use within the SHELAA which is wholly inappropriate as the basis to assess the potential impacts arising from the development of c550 dwellings on the edge of East Grinstead as a standalone site.

We contest the SHELAA assessment of impacts on the Worth Way Local Wildlife Site (LWS) and Hedgecourt SSSI, which conflicts with the findings of the Ecology Report contained herewith. It is acknowledged that Hedgecourt SSSI is a popular local walking route. However, Hedgecourt is approximately 1.9km away from the nearest point of the development proposed on land at Imberhorne Farm. Furthermore, Hedgecourt Lake is separated from the site by the A264, a main road. Alternatively, residents of the proposed development will have access to an onsite Strategic SANG and the Worth Way, so it is highly unlikely that there will be significant recreational use of Hedgecourt Lakes by residents of the proposed development.

The response from Natural England as summarised in the SHELAA site assessment, suggests that there could be harm to the Worth Way Local Wildlife Site, however, the summary also advises that Natural England have no details of the scale or type of the proposed development and have assessed the cumulative impacts of 2,800 dwellings (of which only 550 are allocated) and as such, it must follow that their assessment can be given very little weight. The Worth Way is already a well used recreational route, it is on the national cycle route (Route 21), it provides an important recreational route but also a safe pedestrian and cycle link to the Town Centre, as such, it is not considered that any further recreational use should be discouraged.

Furthermore, the SHELAA assessment only acknowledges the potential for biodiversity net gain within the consultation, it does not include it within the assessment of ecological impacts. The site is farmland and significant open space is proposed, including an onsite Strategic SANG and a range of ecological improvements, this has the potential to offer significant biodiversity net gain. This should be included within the assessment.

We request that MSDC and Natural England review the impacts of the proposed development individually (ie. not in conjunction with other sites, particularly those not promoted for housing development) and in light of the evidence. The SHELAA process is an assessment of individual sites and not of cumulatively effects of combined, not allocated sites. This would alter the assessment of the impacts on SSSI/SNCI/LNR, which would

become 'amber', noting the lower level of harm and the potential for mitigation (as concluded on site #686).

2. Heritage

Welbeck also object to the Council's assessment of heritage impacts as set out in the SHLEAA, this does not reflect the most recent evidence submitted to the Council, the specialist advice provided to Welbeck by Orion Heritage, or the amendments which have been made to the proposals as part on ongoing dialogue with MSDC's Conservation Officer. Furthermore, the SHELAA site boundary is wider than the area proposed for allocation, disregarding the removal of the south-west field from the proposals in accordance with feedback from the Council's Heritage Officer.

The SHLEAA assessment states that the development would engulf Imberhorne Farm and Imberhorne Cottages, which would lead to high levels of Less Than Substantial Harm. We do not agree with this assessment, but nonetheless, have amended the concept masterplan prior to the Regulation 19 consultation (and included within the Site Library) to remove development from the field to the west of Imberhorne Farm and Imberhorne Cottages. This will retain a sense of rurality to the remaining farmstead, this is reflected in the latest site allocation boundary and has been agreed by the Council.

Furthermore, the indicative layout for the Care Community has been prepared to retain views of Imberhorne Cottages (the Care Community is proposed as two storey buildings only). Our specialist advisors have therefore concluded that there will be Less than Substantial Harm on the low end of the scale in respect of Imberhorne Farm and Imberhorne Cottages.

Similarly, the Council's SHELAA assessment concludes that the introduction of housing around Gullege Farm would erode its rural setting resulting in Less Than Substantial Harm on the high end. We strongly disagree. The predominant outlook of Gullege Farmhouse is to the south towards the Worth Way, and not from the north. The concept masterplan and site allocation boundary have been amended to reflect discussions with the Council's Conservation Officer, removing the field between Gullege Farm and Imberhorne Farm, which our specialist advisors conclude would result in only a low level of Less than Substantial Harm.

As such, we respectfully request that MSDC review the evidence submitted in support of the proposals and the changes that have been made since the Regulation 18 proposal as a result of consultation with the Council and consequently reflected in the change in the site allocation boundary.

Notwithstanding the above, we welcome the Council's application of the NPPF (paragraph 196) and balancing the perceived harm to these listed building against

the public benefits of the proposal.

Sustainability Appraisal

Welbeck support the Council's thorough assessment of the 'sifted sites' which subject to minor amendments is a sound evidence base to support the SA DPD.

Following the SHELAA process, the Council have appropriately assessed the sites through the Sustainability Appraisal (SA) categorising the land west of Imberhorne Upper School (Site Ref #770) as one that performs well and should therefore be taken forwards to site allocation. Crucially, this supports the delivery of housing at East Grinstead, to meet the identified residual housing need.

Welbeck support the Council's sustainability appraisal of the site at pages 129 and 130 of the SA (referred to as Option E), acknowledging that the site will positively contribute ('++') towards the residual housing need of East Grinstead.). As a large site, it is also capable of accommodating a range of housing types and sizes, including small family dwellings and affordable housing; the site will also delivery housing for the older population through the proposed Care Community.

In conclusion, the SA (page 130) notes that weight should be afforded to those sites that can contribute towards this residual requirement, where the positives would outweigh the negative impacts, this wholly accords with the presumption in favour of sustainable development set out in the NPPF.

Although we wholly support the SA process and assessment of the land west of East Grinstead (now referred to as land east and south of Imberhorne Upper School), it does not appear to identify the additional positive contributions the proposal will make towards education and health through the delivery of a 2FE primary school, land for Imberhorne Secondary School, a Care Community and GP surgery. Paragraph 3.30 of the SA identifies that primary schools are at 93% capacity in the East Grinstead area, whilst East Grinstead secondary schools are at 89%. The delivery of land for the expansion and consolidation of Imberhorne Secondary School and land for a new primary school, will allow for further capacity within the wider area over and above that required for the site alone. Additionally, Welbeck are committed to delivering a GP surgery where supported by the CCG, which would improve the assessment of the health objective from a negative score to a positive one.

Additionally, it is questioned how sites in Felbridge (SHELAA sites 196 and 595 for example) are stated to have positive regeneration outcomes whereas strategic development at East Grinstead will has a lesser effect on regeneration. Felbridge is a small settlement with minimal services, furthermore, the majority of Felbridge is in Tandridge District and Surrey County and therefore it is questioned what regeneration could be delivered through

these small sites, which would benefit Mid Sussex District. Conversely, strategic development at East Grinstead will positively support the Town Centre through an increase in population and therefore footfall, encouraging new investment in the Town Centre, we therefore submit that the assessment of regeneration impacts arising through the development of land at Imberhorne (Option E) should be enhanced to '++'.

Furthermore, we submit that the assessment of the biodiversity impacts should be improved to at least 'O'. It is acknowledged that the site is adjacent to Ancient Woodland and the Worth Way, a Local Wildlife site, however, there will be no direct impact on these designations as they fall outside the site. Additionally, through the delivery of the proposal, significant landscaped open space will be delivered, including 17ha of formal and informal open space and c40ha of Strategic SANG, both of which will deliver ecological enhancements over the current farmed use of the land. Additionally, the Environmental Bill has had its second reading and is likely to become made legislation over the Plan Period, requiring biodiversity net gains.

Policy 35 – Safeguarding of Land for and Delivery of Strategic Highway Improvements

Welbeck support policy SA35 which seeks to safeguard land for, and deliver, strategic highway improvements, and commends MSDC for identifying and seeking to deliver improvements to existing infrastructure, such as local road networks. MSDC have undertaken a sustainability appraisal of the policy and delivery of these improvements, which unsurprisingly gives rise to overwhelming positive outcomes. Welbeck in conjunction with MSDC and WSCC have considered a range of possible highway improvement projects which could be secured through policy SA35 and have provided sufficient evidence to the Highways Authority that these schemes will offer a betterment to future journey times along the corridor; all proposed developments in the area which would have an impact on the A264/A22 corridor would be required to make contributions towards these improvements. The SA DPD does not need to identify the scheme of improvements but be confident that there are schemes which could be delivered, furthermore, to secure the detailed scheme would be inflexible.

Plan making should look to the future and set a framework not only for addressing housing and economic needs, but also social, environmental and infrastructure priorities (paragraphs 15 and 20 of the NPPF). Policy 35 seeks to identify improvements to the A22 Corridor at the Felbridge, Imberhorne Lane and Lingfield junctions; development in and around East Grinstead, including that allocated at policy SA20, will be expected to make contributions towards these strategic highways improvements for the overall betterment of the traffic movement through the Town. Paragraph 22 of the NPPF requires that strategic policies look to a minimum period of 15 years from adoption, to anticipate and respond to long-term requirements, including infrastructure, policy 35 wholly accords with this principle.

Conclusion

In summary, Welbeck wholly support Policy SA20 and SA35 of the SA DPD and the evidence base underpinning these policies, which seek to meet the housing and future infrastructure needs of East Grinstead in accordance with the NPPF and the District Plan. It is submitted that the SA DPD accords with the strategic policies of the District Plan and seeks to positively deliver against the residual housing requirement in accordance with the spatial strategy and settlement hierarchy.

Welbeck believe that the SA DPD is:

- a) **Positively prepared** – it provides a strategy which seeks to meet more than the residual housing requirement in order to ensure flexibility in the market and to account for the potential for some sites not to come forwards, whilst according with the principles of sustainable development by focusing on the most sustainable settlements. It also unlocks land at Imberhorne Lower School, as identified in the EGNP, which is included in the Council’s housing trajectory.
- b) **Justified** – the SA DPD is the most appropriate strategy, the Council have reviewed a large pallet of sites and then undertaken further detailed site assessment through the SA process, identifying a suite of sites which perform well individually but also against the spatial distribution set out within the District Plan.
- c) **Effective** – the Council have confirmed with site proponents that sites are deliverable and the SA DPD identifies the delivery timescales for each site. In relation to policy SA20, the Council in consultation with Welbeck have evidenced that the site is capable of being delivered within the plan period.
- d) **Consistent with national policy** – these representations demonstrate how the allocation of land at policy SA20 is consistent with national policy, including additional meeting infrastructure needs (housing for the older population, education, health care, highways, ecology and access to open space).

We submit that policies SA20 and SA35 meet the tests of soundness as set out in the NPPF subject to the minor amendments set out in these representations.

Welbeck would like to be kept up-to-date with the progress of the SA DPD and reserve the right to participate in the forthcoming Examination Hearings. For further information, or to discuss, please contact Katie Lamb on 01293 605192 or katie.lamb@dmhstallard.com.

Yours faithfully



DMH Stallard LLP