

SA18: Former East Grinstead Police Station, College Lane - Index by ID Number

ID	Respondent	Organisation	BehalfOf	Respondent Category	Participate
582	Mr & Mrs R & T Tullett		East Grinstead and District Cycle Forum	Resident	<input type="checkbox"/>
584	Mr R Whalley			Resident	<input type="checkbox"/>
602	Mr J Beale	East Grinstead Society		Organisation	<input type="checkbox"/>
666	Mrs J Holden	East Grinstead Town Council		Town & Parish Council	<input type="checkbox"/>
710	Mr N Burns	Natural England		Statutory Consultee	<input type="checkbox"/>
1005	Mr L Beirne			Resident	<input type="checkbox"/>
1035	Ms L Edwards			Resident	<input type="checkbox"/>
1381	Mr N Bailie			Resident	<input type="checkbox"/>
1392	Mr F Berry			Resident	<input type="checkbox"/>
1436	Ms M Collins			Resident	<input type="checkbox"/>
1442	Ms M Baldwin			Resident	<input type="checkbox"/>
1478	Ms J Holdaway			Resident	<input type="checkbox"/>
1487	Mr A Fennell			Resident	<input type="checkbox"/>
1577	Mr and Mrs A+K Corsie			Resident	<input type="checkbox"/>
1723	Mrs J Roberts			Resident	<input type="checkbox"/>
1808	Mr M Mitchell			Resident	<input type="checkbox"/>
1809	Mrs V Mitchell			Resident	<input type="checkbox"/>
1811	Mr J Capp			Resident	<input type="checkbox"/>
1813	Ms C Capp			Resident	<input type="checkbox"/>
1831	Ms G Lewis			Resident	<input type="checkbox"/>
1877	Mr A Jordan			Resident	<input type="checkbox"/>
1930	Ms A Rijndorp			Resident	<input type="checkbox"/>
2002	Mr R Burleigh			Resident	<input type="checkbox"/>
2140	Mr C Hough	Sigma Planning Services	Rydon Homes Ltd	Promoter	<input checked="" type="checkbox"/>
2165	Mrs & Mr J & J Hayler			Resident	<input type="checkbox"/>

Site Allocations DPD: Regulation 19 Consultation Response

Policy: SA18

ID: 582

Response Ref: Reg19/582/2

Respondent: Mr & Mrs R & T Tullett

Organisation:

On Behalf Of: East Grinstead and District Cycle Forum

Category: Resident

Appear at Examination? x

East Grinstead and District Cycle Forum

Objection to Mid Sussex DC Regulation 19 Site Allocations DPD

September 2020

This draft Site Allocations DPD proposes an extra c800 dwellings to be added to the District Plan target for the East Grinstead area - this would bring the total number of homes to be provided in the East Grinstead area during the District Plan period (2014 to 2031) to around 2500 - thus adding around 25% to the population of East Grinstead. **Our comments below relate to the Housing Sites SA18, SA19, SA20.**

The East Grinstead and District Cycle Forum is supportive of sustainable development, but there is nothing in these proposals that gives us any confidence that the necessary investment in sustainable transport infrastructure and services (Cycling, Walking and Public Transport) will be made. If these plans take away the open countryside we enjoy for our physical and mental wellbeing, and add 25% to the number of car journeys undertaken in the area, the health, economic and environmental damage will be enormous.

Paragraph 110 of the National Planning Policy Framework 2019 (NPPF) states that development applications should "give priority first to pedestrian and cycle movements both within the scheme and within neighbouring areas". Neither the various developer's proposals for these sites, nor the Systra Transport study, have been carried out with the focus required by the NPPF, a focus now reinforced by the publication of Local Transport Note 1/20.

Very little is proposed for sustainable transport measures in this DPD – bus priority lanes on the A264 to Crawley, a bus stop on the Imberhorne Farm development, a new cycling/walking link to the Worth Way. The Systra Transport study states these measures might deliver a 2 or 3% reduction in the additional car journeys that another 750 homes, GP surgery, new primary school, care home etc. might generate. A completely inadequate response to the challenge.

The highway improvements to A264/A22 junctions, as proposed in the Atkins 2012 study, are referenced in the draft DPD at SA35, and the junctions shown in Appendix E. However, it is acknowledged that these were designed to address existing congestion and will not provide capacity for significant additional journeys. There seems to be an acceptance of permanent rush hour gridlock on the A22/A264 London Road in East Grinstead, and a suggestion that new traffic generated from Imberhorne Farmlands (SA20) can be allowed to use routes B2028/B2110 via Turners Hill until they are also gridlocked. Only then would people be forced to use sustainable transport options. No specific transport measures are proposed to support 200 new homes on Crawley Down Road (SA19), beyond the minor improvements included in Surrey CC investment plans.

The East Grinstead and District Cycle Forum **objects** to this Site Allocations DPD as the following issues raised at Regulation 18 stage have not been addressed:-

- We need to see a fully funded Local Cycling and Walking Infrastructure Plan (LCWIP) for the whole of East Grinstead, to work out how we can achieve the modal shift to cycling/walking journeys in the town, through safer roads and new purpose-built cycle routes. We are ready and willing to contribute to the execution of an LCWIP in East Grinstead. This is a required first step under Local transport Note 1/20, and planning this scale of development in advance of an LCWIP does not meet national or local sustainable transport objectives.

- MSDC should provide much greater clarity on the level of private car usage that is predicted on the A22/A264 and other routes to the west of East Grinstead, and how this is forecast to change over the next 5, 10 and 15 years.
- Upgrade the surface of all existing Bridleways and Restricted ByWays in the East Grinstead area to provide conditions suitable for commuter and everyday cycling.
- Develop plans for a step change in investment in local buses, to ensure that bus services are much more frequent, reliable, quicker and more competitive on price. Honestly address the problem of how this can be delivered and maintained in the long term, given the current deregulated bus services in West Sussex, and the history of subsidy cuts to rural buses in this area.

In order to illustrate the real-world impact that well-designed safe cycling infrastructure can have please take note of the following:

1. The East Grinstead Strategic Development Transport Advice Report states that 7,346 car journeys are carried out every morning rush hour.
2. A recent survey by the Brake road safety charity stated that "35% of people would switch to cycling for commuting if the roads were less dangerous"
3. 66% of all British journeys are under 5 miles - a distance easily cycled in less than 30 minutes.

Using the above data, it is clear that good quality cycling infrastructure has the potential to take nearly **1,700 car journeys off the road every morning rush hour**. The positive impact of this on congestion, air quality, public health and well-being as well as parking, road maintenance, road policing and road safety is too significant to ignore any longer.

Since we made these points in 2019 in response to the Reg 18 consultation, there has been a significant national increase in cycling levels during the Covid 19 pandemic which adds weight to all our arguments.

In conclusion, the East Grinstead and District Cycle Forum doesn't believe that the proposed additional development for East Grinstead will be "sustainable", as defined in the 2019 NPPF, without clear and realistic transport strategies to avoid ever increasing reliance on the private car. These proposals in their current form merely lock in car dependency for another generation.

East Grinstead and District Cycle Forum response to Site Allocations DPD consultation

September 2020 – Contact Roger Tullett, e mail [REDACTED]

End

Site Allocations DPD: Regulation 19 Consultation Response

Policy: SA18

ID: 584

Response Ref: Reg19/584/1

Respondent: Mr R Whalley

Organisation:

On Behalf Of:

Category: Resident

Appear at Examination? x

Name	Robin Whalley
Address	[REDACTED]
Phone	[REDACTED]
Email	[REDACTED]
Name or Organisation	Robin Whalley
Which document are you commenting on?	Site Allocations DPD
Sites DPD Policy Number (e.g. SA1 - SA38)	SA18 - Former East Grinstead Police Station
Do you consider the Site Allocations DPD is in accordance with legal and procedural requirements; including the duty to cooperate	No
(1) Positively prepared	Unsound
(2) Justified	Unsound
(3) Effective	Unsound
(4) Consistent with national policy	Unsound

Please outline why you either support or object (on legal or soundness grounds) to the Site Allocations DPD

- a) There has been no recent assessment of the true demand side of the equation, first of all by District (ie Mid Sussex) then specifically by smaller communities ie East Grinstead.
- b) The Mid Sussex District Plan is 2 years old (at least if you count the number of times it was issued and reissued), so should not the real current housing demand be reassessed?
- c) The economic climate following the COVID-19 pandemic has drastically altered, particularly in the Crawley-Gatwick area following the withdrawal of British Airways and Virgin Atlantic. This had led to substantial job losses both directly (over 5,000) and indirectly, which must affect the local housing needs.
- d) The lack of uptake of apartments and flats in East Grinstead (there are many which have been unsold for over two years) must indicate that the demand side analysis is grossly wrong and should be re-evaluated with development space allocated based on local demand not simply on a rule of thumb based on land availability!!
- e) Demand for housing still exists in the Crawley area and satisfying this demand in East Grinstead would lead to increased commuting on already congested roads adding to an increase in local emission of greenhouse gasses.
- f) The infrastructure in East Grinstead is already stretched, particularly the road system around the A264/A22 where traffic queuing is frequent throughout the day. Doctors' surgeries are similarly working at capacity.
- g) Many employment opportunity spaces have been lost in East Grinstead already by their conversion to apartments many of which remain unoccupied. Additional housing will lead to more external commuting and more emissions of greenhouse gasses.
- h) The number of dwellings envisaged in the Draft Sites Allocation is disproportionately large for East Grinstead's population when compared with elsewhere in the Mid Sussex area.
- i) The use of East Grinstead to satisfy the demand for Crawley's housing needs will lead to East Grinstead becoming a suburb of Crawley and losing its market town heritage.
- j) It is not clear why alternative sites in and around Crawley for Crawley's future housing needs have not been fully explored.

This site is close to the Grade 2 listed East Court Mansion and can only be accessed by very narrow roads. The area close by is a pleasant open space with parking for the functions and amenities at East Court. A through road would ruin the current ambiance and present a potential danger to the adjacent children's play area. Access to East Court from Escotts Drive is difficult and the Escotts Drive to B2110 (College Lane) junction is close to the narrowest and one of the most dangerous stretches of road in East Grinstead where College Lane passes through the local sandstone outcrops at Blackwell Hollow. Access to the site from the A264 is at the moment limited to the local football club and additional traffic on this route would require a remodelling of the two roundabouts on the A264.

Please set out what change(s) you consider necessary to make the Site Allocations DPD legally compliant or sound, having regard to the reason you have identified at question 5 above where this relates to soundness.

- a) Recalculate the true demand for housing in East Grinstead having first reassessed the economic climate in the Crawley/Gatwick area following the withdrawal of British Airways and Virgin Atlantic. Make due allowance for those empty flats, apartments and shops currently available.
- b) Properly consider sites closer to Crawley where the demand is greater and which if taken up, would reduce commuting time and thus atmospheric pollution.

If you wish to provide further documentation to support your response, you can upload it here

If your representation is seeking a change, do you consider it necessary to attend and give evidence at the hearing part of the examination	Yes, I wish to participate at the oral examination
If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary	Because my experience with Mid Sussex previously is that comments from the general public are ignored.
Please notify me when-The Plan has been submitted for Examination	yes
Please notify me when-The publication of the recommendations from the Examination	yes
Please notify me when-The Site Allocations DPD is adopted	yes
Date	23/09/2020

Site Allocations DPD: Regulation 19 Consultation Response

Policy: SA18

ID: 602

Response Ref: Reg19/602/2

Respondent: Mr J Beale

Organisation: East Grinstead Society

On Behalf Of:

Category: Organisation

Appear at Examination? x

Site Allocations and Development Plan Document (DPD) - July 2020

Response by The East Grinstead Society

We commented on the Draft of this plan in November 2019 and regret that so little has been varied in the ensuing period to July 2020.

As before our comments relate to both the general context of East Grinstead and the three specific sites in the DPD, SA18, SA19 and SA20. We end with some general conclusions

Context

Our start point is that we see no evidence of unmet demand for housing in East Grinstead when there is so much unfilled accommodation. We believe that there is an overwhelming view in the Town that it is necessary to protect its unique market town heritage and not let it slip further into being a satellite of Crawley. This view is not simply an unnecessarily negative response but one underpinned by serious and long recognised issues around traffic congestion and an inadequate local road system.

Regarding the general situation SA35 – Safeguarding of land for and Delivery of Strategic Highway Improvements – is of particular relevance. This effectively concedes that the developments now proposed in the DPD will cause unacceptable road congestion throughout the East Grinstead area without major road improvements. It identifies the land that should be safeguarded to support the delivery of transport schemes, particularly the A22/A264 corridor upgrades at Felbridge, Imberhorne Lane and Lingfield Road. It goes on to suggest that there will be a need for further consultations between MSDC, WSCC, and other relevant parties, presumably Surrey County Council and Tandridge District Council but particularly East Grinstead Town Council.

Considering the long history of the congestion issue and its continuing impact on the issue of development in and around East Grinstead it is wishful thinking in the extreme to offer consultation as a key to unlock the issue without any evidence of any chance of success this time.

Thus until these consultations have taken place, a plan of action agreed and the works commenced it would appear to be imprudent to commence the housing developments envisaged in the DPD .

There is a major omission from the proposed list of safeguarded land in SA35. This is the junction of the Crawley Down Road and the A264. The two roads meet at a very acute angle and we are led to understand that the green space at this junction which would apparently allow expansion of the junction is protected by the terms of a gift to the people of Felbridge so this is a non-starter as congestion mitigation.

Specific Sites

SA18 Police Station East Court

The site is adjacent to the East Court Mansion which is a listed building with a large conservation area around it. The existing parking facilities relate to the needs of the council offices and the hirers of the public buildings on the site. The private road that services these buildings is narrow and is only provided for visitors and not for through traffic. The junctions for this private

road with the public road network are not suitable for significant extra traffic. Any parking facilities required for this proposed development will have to be within the site and not spill over into the Mansion parking facilities. There is a childrens' playground close by which must be protected from the potential threat of through traffic.

Furthermore, we think there are some important underlying questions. What are the implications for the Old Court House which is joined to the Police Station and could it be incorporated into the scheme? Have any surveys been undertaken to study the stability of the land to ensure that the development would not slip into Blackwell Hollow?

SA19 Backland along Crawley Down Road

This proposal is complicated by the fact that the 200 houses would be in Mid-Sussex but the road access would be in Surrey. There is a well-filled primary school in Felbridge and an indifferent bus service but for all other services the inhabitants would have to look to East Grinstead. It has been established that to prevent coalescence of communities there should be no internal routes to connect the site with East Grinstead so access to these services would have to be by road using the road network referred to earlier in this note which has been recognised as unsatisfactory and congested. This is another problem for the joint councils working party on traffic mitigation to resolve before the housing scheme could be commenced.

SA20 Imberhorne Farm

This scheme for 550 houses has major implications for the road network. The scheme would be accessed by a substantial roundabout opposite Heathcote Drive on Imberhorne Lane. Imberhorne Lane will have to bear the pressure of traffic from the Hill Place Farm development on the Turners Hill Road, the Imberhorne and Garden Wood estates, traffic to and from Hazelden crossroads and, of course, that accessing the enlarged secondary school.

Regarding the enlarged secondary school much has been made of the benefit of combining the upper and lower portions. We look for clarification as to whether the proposal merely provides space for a school that caters for today's population or will there be adequate facilities for the children of these new developments as well?

General Conclusions

We note that the DPD is based on the world as it existed when the District Plan was originally prepared and things have moved on since then. In consequence the needs of the area have altered substantially, the DPD has not.

We have little office space available due to permitted schemes (and do not know if such space will ever be in demand again), with office space changing into flats with further ones in prospect. Added to this may be redundant shops. Changing working practices may alter the demand and we cannot be certain that all the new housing is going to be filled, with current schemes yet to be filled.

We are concerned that the character of the Town will be sacrificed for an empty prize, leaving its residents with congestion and a Town that is a dormitory of Crawley but with a load of empty accommodation.

Site Allocations DPD: Regulation 19 Consultation Response

Policy: SA18

ID: 666

Response Ref: Reg19/666/1

Respondent: Mrs J Holden

Organisation: East Grinstead Town Council

On Behalf Of:

Category: Town & Parish Council

Appear at Examination? x



EAST GRINSTEAD TOWN COUNCIL

Council Offices, East Court, College Lane, East Grinstead, West Sussex, RH19 3LT

Web site: www.eastgrinstead.gov.uk E mail: townclerk@eastgrinstead.gov.uk

Tel: (01342) 323636

Town Clerk: Mrs J W Holden EDMS, IRRV (Hons), Cert HE Comm Gov, PSLCC



INVESTOR IN PEOPLE

Your Ref:

My Ref:

When calling please ask for: Mrs J Holden

24th September 2020

Site Allocation DPD – Regulation 19 consultation

Thank you for the opportunity to consider the draft DPD further. The Council wish to refer back to our response of 20th November 2019. In addition to those earlier comments we would add the following:

Site SA18 - The Council again refer to paragraph 4.18 of the East Grinstead Neighbourhood Plan and feel strongly that the erosion of the community feel of the estate must be resisted. The inclusion of a built up area boundary on East Court is the start of further creep where this former private estate will erode to development and we very much object to the stating of a built up area boundary on East Court.

Site SA19 – This site remains of great concern as to coalescence between the Parish of East Grinstead and the neighbouring villages (EGNP EG2A). Being part of East Grinstead but being wholly consumed within the community of Felbridge where there is no proposed additional infrastructure means this development will be to the detriment of both East Grinstead and Felbridge.

Site SA20 - The Council acknowledge that if designated as a strategic site this will override the East Grinstead Neighbourhood Plan policy for this site to remain an open site. It is also recognised that the a development of this size will have significant impacts on the traffic and community facilities that it must be a condition that the infrastructure elements are all complete in tandem with phase 1 of the development should this site go ahead. This will be in line with the precedent set by the Northern Arc development in Burgess Hill and must be applied to all strategic development of significant size.

The Council has concerns as to the soundness of the plan having considered the transport studies. The SYSTRA plan that was undertaken by MSDC determined that the junctions around East Grinstead (we are specifically referring to the A264/ A22 junctions which will bear the load of the development in SA19 and SA20) will be over capacity under the current planned build. However the SYSTRA report also refers to the current capacity as being at 61% (AM peak) and 65% (PM Peak). Whilst the WSP report (executive report is published on the Tandridge DC website) quotes the current capacity as 106.6% (Peak AM) and

101.4% (Peak PM). If the WSP figures are accurate with the additional builds significant road mitigation will be necessary to accommodate the proposed sites. SA35 identifies land to be protected for future traffic corridor upgrades. We would contend these need to be identified to come forward in the life of this plan to mitigate proposed developments and should include Imberhorne Lane as a whole.

The Council further acknowledge with thanks, the removal of the Old Court House from SA34 and Appendix A.

Yours sincerely

Julie Holden
Town Clerk
East Grinstead Town Council

Site Allocations DPD: Regulation 19 Consultation Response

Policy: SA18

ID: 710

Response Ref: Reg19/710/3

Respondent: Mr N Burns

Organisation: Natural England

On Behalf Of:

Category: Statutory Consultee

Appear at Examination? x

Date: 28 September 2020
Our ref: 324095



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

Customer Services
Hornbeam House
Crewe Business Park
Electra Way
Crewe
Cheshire
CW1 6GJ

T 0300 060 3900

BY EMAIL ONLY

Dear Sir / Madam

Planning consultation: Mid Sussex District Council Site Allocations DPD - Regulation 19 Consultation

Thank you for your consultation on the above dated 03 August 2020 which was received by Natural England on the same day.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Natural England welcomes the approach taken by your authority to consult with Natural England at various stages in the preparation of the Site Allocations Development Plan Document. We are pleased that our engagement has resulted in our comments/concerns being addressed in this version of the plan. In particular, we welcome the positive engagement by Mid Sussex District Council with both Natural England and the High Weald AONB Unit in the assessment of the Regulation 19 proposed site allocations within the High Weald Area of Outstanding Natural Beauty (AONB).

From this assessment, we recognise and welcome that a conclusion has been reached that none of the proposed site allocations (Policies SA7, SA8, SA25, SA26, SA27, SA28, SA29, SA32) constitutes major development within the AONB.

Our comments on your Regulation 19 Site Allocations Development Plan Document (DPD) Site allocations and development policies, followed by general comments are as follows.

Comments on specific allocations

SA 7 - Cedars, Brighton Road, Pease Pottage

We support the requirement of this allocation to undertake a Landscape and Visual Impact Assessment (LVIA) to consider potential impacts on the special qualities of the High Weald AONB.

SA 8 - Pease Pottage Nurseries, Brighton Road, Pease Pottage

We support the requirement of this allocation to undertake a Landscape and Visual Impact Assessment (LVIA) to consider potential impacts on the special qualities of the High Weald AONB.

We also support the requirements regarding nearby ancient woodland in line with Natural England's [standing advice](#).

SA 18 - Former East Grinstead Police Station, College Lane, East Grinstead

We recommend a requirement be included for this development to contribute to the existing strategic solution in accordance with District Plan Policy **DP17: Ashdown Forest SPA and SAC**.

SA 19 – Land south of Crawley Down Road, Felbridge

We recommend a requirement be included for this development to contribute to the existing strategic solution in accordance with District Plan Policy **DP17: Ashdown Forest SPA and SAC**.

We support the requirement of this allocation to provide suitable SuDS and greenspace to address potential impacts on the Hedgecourt Lake SSSI.

SA 20 – Land south and west of Imberhorne Upper School, Imberhorne Lane, East Grinstead

We support the requirements of this allocation to provide an appropriately managed strategic Suitable Alternative Natural Greenspace (SANG) to mitigate increased recreational disturbance on Ashdown Forest Special Protection Area (SPA) and Special Area of Conservation (SAC); such a SANG proposal must be considered in accordance with District Plan Policy **DP17: Ashdown Forest SPA and SAC**.

We also support the requirement for potential impacts of development on Hedgecourt Lake SSSI to be understood and adequately mitigated.

We also support the requirements regarding nearby ancient woodland in line with Natural England's [standing advice](#).

SA 22 – Land north of Burleigh Lane, Crawley Down

We recommend a requirement be included for this development to contribute to the existing strategic solution in accordance with District Plan Policy **DP17: Ashdown Forest SPA and SAC**.

SA 25 – Land west of Selsfield Road, Ardingly

We recommend a requirement be included for this development to contribute to the existing strategic solution in accordance with District Plan Policy **DP17: Ashdown Forest SPA and SAC**.

We support the requirements of this allocation to undertake a LVIA to consider potential impacts on the special qualities of the High Weald AONB.

SA 26 – Land south of Hammerwood Road, Ashurst Wood have

We recommend a requirement be included for this development to contribute to the existing strategic solution in accordance with District Plan Policy **DP17: Ashdown Forest SPA and SAC**.

We support the requirements of this allocation to undertake a LVIA to consider potential impacts on the special qualities of the High Weald AONB.

SA 27 – Land at St. Martin Close, Handcross

We support the requirements of this allocation to undertake a LVIA to consider potential impacts on the special qualities of the High Weald AONB.

SA 28 – Land South of The Old Police House, Birchgrove Road, Horsted Keynes

We recommend a requirement be included for this development to contribute to existing strategic solution in accordance with District Plan Policy **DP17: Ashdown Forest SPA and SAC**.

We support the requirements of this allocation to undertake a LVIA to consider potential impacts on the special qualities of the High Weald AONB.

SA 29 – Land south of St. Stephens Church, Hamsland, Horsted Keynes

We recommend a requirement be included for this development to contribute to the existing strategic solution in accordance with District Plan Policy **DP17: Ashdown Forest SPA and SAC**.

We support the requirements of this allocation to undertake a LVIA to consider potential impacts on the special qualities of the High Weald AONB.

SA 32 – Withypitts Farm, Selsfield Road, Turners Hill

We recommend a requirement be included for this development to contribute to the existing strategic solution in accordance with District Plan Policy **DP17: Ashdown Forest SPA and SAC**.

We support the requirements of this allocation to undertake a LVIA to consider potential impacts on the special qualities of the High Weald AONB.

Comments on Development Policies

SA38: Air Quality

Whilst we support the requirement of this policy for applicants to demonstrate there is not an unacceptable impact on air quality resulting from their proposals we recommend the following change in wording to strengthen the protection of designated sites.

*“Development proposals that are likely to have an impact on local air quality, including those in or within relevant proximity to existing or potential Air Quality Management Areas (AQMA)s or **designated nature conservation areas sensitive to changes in air quality**, will need to demonstrate measures/ mitigation that are incorporated into the design to minimise any impacts associated with air quality.*

We recognise there is specific wording established for air quality impacts for Ashdown Forest and this suggestion is additional for any other relevant sites which could be potentially impacted by changes to air quality.

General comments

Biodiversity net gain

We strongly support the requirements of all allocations to ensure there is a net gain to biodiversity as well as the general principle for site allocations to: *“Conserve and enhance areas of wildlife value and ensure there is a net gain to biodiversity, using the most up-to-date version of the Biodiversity Metric. Avoid any loss of biodiversity through ecological protection and enhancement, and good design. Where it is not possible, mitigate and as a last resort compensate for any loss. Achieve a net gain in biodiversity (measured in accordance with Government guidance and legislation), for example, by incorporating new natural habitats, appropriate to the context of the site, into development and designing buildings with integral bat boxes and bird nesting opportunities, green/brown roofs and green walling, in appropriate circumstances in accordance with District Plan Policy”.*

We would still however recommend that your DPD should include requirements to monitor biodiversity net gain. This should include indicators to demonstrate the amount and type of gain provided through development. The indicators should be as specific as possible to help build an evidence base to take forward for future reviews of the plan, for example the total number and type of biodiversity units created, the number of developments achieving biodiversity net gains and a record of on-site and off-site contributions.

We recommend that Mid Sussex District Council works with local partners, including the Local Environmental Record Centre and Wildlife Trusts, to share data and consider requirements for long term habitat monitoring. Monitoring requirements should be clear on what is expected from landowners who may be delivering biodiversity net gains on behalf of developers. This will be particularly important for strategic housing allocations, and providing as much information on monitoring upfront as possible will help to streamline the project stage.

Water efficiency

Your Authority contains areas of Serious Water Stress as designated by the Environment Agency. For developments in Southern Water Services drinking water supply area Natural England recommends water efficiency policies should be developed to support Southern Water's "Target 100".

This target, of 100 litres per person per day by 2040 has been identified by Southern Water to avoid the need for water supply options that are likely to damage biodiversity or/and effect protected landscapes. For development in other companies' supply areas Natural England supports the Environment Agency's recommendation of a maximum of 110 litres per person per day.

Water efficiency measures will help reduce the current impact of water resources on the natural environment and thereby contribute to more resilient landscapes and seas, one of the aims in Natural England's 'Building partnerships for nature's recovery: Action Plan 2020/21'¹. Reducing the water we use will also contribute to the Government's 25 Year Environment Plan aspirations for clean and plentiful water and to restore sustainable abstraction.

Soil

Soil is a finite resource, and fulfils many roles that are beneficial to society. As a component of the natural environment, it is important that soils are protected and used sustainably.

The DPD should recognise that development (soil sealing) has a major and usually irreversible adverse impact on soils. Mitigation should aim to minimise soil disturbance and to retain as many ecosystem services as possible through careful soil management during the construction process.

Soils of high environmental value (e.g. wetland and carbon stores such as peatland) should also be considered to contribute to ecological connectivity, as such these soils should be conserved and protected from negative impacts.

We recommend that allocation policies refer to the [Defra Code of practice for the sustainable use of soils on construction sites](#).

Comments on HRA

Natural England notes that your authority, as competent authority, has undertaken an appropriate assessment of this DPD in accordance with regulation 63 of the Conservation of Species and Habitats Regulations 2017 (as amended). Natural England is a statutory consultee on the appropriate assessment stage of the Habitats Regulations Assessment process.

Your appropriate assessment concludes that your authority is able to ascertain that the implementation of this DPD will not result in adverse effects on the integrity of any of European sites in question.

Having considered the assessment, and the measures proposed to mitigate for all identified adverse effects that could potentially occur as a result of the proposal, chiefly changes in air quality and increased recreational disturbance, Natural England advises that we concur with the assessment conclusions, providing that all required mitigation measures are appropriately secured in any future planning permissions given.

Comments on SA

We have no specific comments to make regarding our statutory remit and your sustainability appraisal.

If you have any queries relating to the advice in this letter please contact me on 07554226006 OR 02080266551.

¹ https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/906289/natural-england-action-plan-2020-21.pdf

Should the DPD change significantly, please consult us again.

Yours faithfully

Nathan Burns
Area Team 14 - Kent and Sussex

1005

Site Allocations DPD: Regulation 19 Consultation Response

Policy: SA18

ID: 1005

Response Ref: Reg19/1005/2

Respondent: Mr L Beirne

Organisation:

On Behalf Of:

Category: Resident

Appear at Examination? x

From: Leo Beirne [REDACTED]
Sent: 28 September 2020 17:19
To: ldfconsultation
Subject: MSDC DEVELOPMENT PLAN DOCUMENT – REG 19 : CONSULTATION.

Categories: [REDACTED]

Dear Sir,

Please accept my comments as per the following re. the above, where the text in 'bold' relates to the Document followed by my comments. I found this exercise very taxing limited by my knowledge of how MSDC has applied specific working knowledge and practices to this Plan including supporting reference documents relating to their effect on East Grinstead; therefore, my comments are very much limited as per the following – i.e.:

'an allocation for a Science and Technology Park to the west of Burgess Hill' – how will this be affected by the reduced office working due to the Corona Virus and more employees working from home in future re. the proposed 7 employment sites Science and Technology Park?

The purpose of the Examination is to determine whether the Site Allocations DPD is 'legally compliant' and 'sound' – does this mean that what is being proposed not 'legally compliant' and 'sound'??

The document is required to ensure the provision of homes, jobs and infrastructure, that have already been agreed to in the District Plan, are delivered. This will ensure we can continue to rely on the District Plan to deliver sustainable growth and so ensuring the Council fulfils its obligations . . . w.r.t. the four main aims – how will and when will MSDC amend this proposal taking the impact and effects of the Corona virus into account which could produce an overall saving for residents?

SA4: Copthorne Land north of the A264 at Junction 10 of M23 – it would appear that this is well underway prior to asking for comments in this document?

SA18: Former East Grinstead Police Station:

- a) with the potential increase in local population, why has this draft omitted to re-establish a permanently staffed Police Station replacing the so part-time Police Hub to support residents where present police support is remote – more people will statistically increase local crime??
- b) **Land owner has expressed an interest in bringing the site forward for development** – who is the Land Owner?
- c) **Optimise the development potential of the site through the provision of apartments of no more than 2½ storeys taking account of potential development opportunities that exist immediately**
- d) **beyond the site boundaries to ensure future redevelopment opportunities are not hindered** – why has the amount of available land for future developments have not been specified nor specifying any restriction that may be applicable from the Covenant Land that require compliance?
- e) **any necessary mitigation is undertaken to the rear of the site adjacent to Blackwell Hollow** – this requires further explanation;
- f) **Biodiversity and Green Infrastructure** – who will be responsible for authorising and accepting a monitoring role through construction?

SA20: Land South and West of Imberhorne Upper School –:

- a) **'a high quality and sustainable extension to East Grinstead'** – how is this 'subjective term' defined in terms of affordability for people living in East Grinstead?
- b) the closeness of this construction to the existing location will make a significant increase in local impact on traffic adding to existing cumulative usage of between 31-39,000+ vehicles annually through A22/A264 road junctions now reduced in width by the Cycle Lane where cyclists now have to fear challenges from adjacent HGV vehicles;
- c) **Retain and enhance existing established trees and other landscape features and weave them into green infrastructure / open space / movement strategy that encourages pedestrian and cycle use** – what policing and punitive consequences will be legally incorporated in agreements to ensure the above is protected?
- d) **Ensure the site maximises connectivity with the existing settlement and services within East Grinstead and utilises a permeable layout throughout** – does this mean that the existing services will be

added to facilitate this development, if so, what residual capacities are available to accept these added loadings?

- e) **Conserve and enhance areas of wildlife value and ensure there is a net gain to biodiversity overall. Avoid any loss of biodiversity through ecological protection and enhancement, and good design. Where this is not possible, mitigate and as a last resort, compensate for any loss** – this appears to be a 'get-out' clause which should be mitigated/avoided as part of the Design prior to granting Consent at the outset;
- f) **Highways and Access** – the existing peak-time traffic congestion/tail-backs should not be added to by this Development as the situation is gruelling at present;
- g) **Utilities** – see 'd)' previous.

Site Allocations Development Plan Document: The Sites DPD allocates additional development sites to meet the residual necessary to meet the agreed housing requirement for the plan period as reflected in the District Plan 2014-2031. The additional allocations are in accordance with the Spatial Strategy and Strategic Policies set out in the District Plan – what does this mean . . . why not use 'Plain English'

The District Plan 2014-2031 and Sites DPD will be used to inform decisions on planning applications across the district, in conjunction with any DPDs relating to minerals and waste prepared by West Sussex County Council and any 'made' neighbourhood plans prepared by the community – when have MSDC promoted this making residents fully aware that this opportunity was/is available via. <https://www.midsussex.gov.uk/planning-building/neighbourhood-plans/>?

Access and highways:

- **Ensure development contributes towards delivering sustainable development and appropriate infrastructure in accordance with District Plan Policy DP21: Transport and the objectives of the West Sussex Transport Plan 2011 – 2026.**
- **Provide a Transport Assessment and Sustainable Transport Strategy to identify appropriate mitigation and demonstrate how development will be accompanied by the necessary sustainable infrastructure to support it.**
- **Highway infrastructure mitigation is only considered once all relevant sustainable travel interventions (for the relevant local network) have been fully explored and have been taken into account in terms of their level of mitigation.**
- **Identify how the development will provide safe and convenient routes for walking and cycling through the development and linking with existing networks beyond. Create a permeable road network within the site with clearly defined route hierarchies.**
- **Safeguard Public Rights of Way (PRoW) and protect their amenity.**
- **Provide adequate car parking in accordance with District Plan Policy DP21: Transport.**

How for how long will the above remain valid given the propensity to accelerate the use of home working, the increased introduction of electric vehicles with power supplies and a reduced workforce?

Employment projections are based on a number of factors and so they are sensitive to change, such as changes in the jobs and employment market and the impact of national policy/legal interventions such as Permitted Development for office to residential conversions.⁸

Office to residential conversions increases the need for adequate off-road vehicle parking and electric charge points – has this been included?

District Plan Policy DP1: Sustainable Economic Development that supports the delivery of an average of 543 jobs per year and allocates 25 hectares of employment land at Burgess Hill to the east of Cuckfield Road to assist meeting this requirement. This is purely speculative to support a hypothesis to increase development.

Table 2.3: District Plan Housing Requirement (updated) – there is insufficient evidence to support these figures including the expected level of affordability given the present and future state of the economy and how demographic stability will support this hypothesis here and elsewhere in the document.

SA18: Former East Grinstead Police Station - 22 dwellings;

SA19 Land South of Crawley Down Rd – 200 dwellings;

SA20 Land South and West of Imberhorne Upper School – 550 dwellings.

The density of infill building in East Grinstead in recent years has brought the Town to gridlock at main times with more to come in the pipeline from Hill Place Farm and Imberhorne Lane, with inadequate parking facilities, the political loss/manipulation of CIL monies for the benefit of the Town, the use of the artificial planning figure of 1.7 vehicles per dwelling, insufficient medical/dental facilities, the adding to poor air quality, etc., which is proving difficult to see the compatibility with the aims/objective referred to in **Para 2.38 Individual applications for the site allocations should be accompanied by**

2.39 Community involvement and consultation is key to ensuring that appropriate facilities are identified and designed to meet the needs of those who will use them. Community engagement and involvement is also

essential for ensuring that new residents integrate with existing communities. This is virtually impossible for a Community to fully achieve given the mass of prerequisite knowledge and familiarity required with the volume of dedicated/specific knowledge (bordering on systems of manipulative jargon) in order to fully appreciate and participate!

In conclusion. As an East Grinstead resident, I have reservations as to the perceived imbalance between the affordability local housing (when I have seen local property being Globally advertised) and the loadings imposed on the infra-structure, which I have previously questioned under the Freedom of Information that remain unanswered in part. In my opinion, there is too much detail to fully assimilate from which to construct a quality response to describe the 'impact Vs benefit' of this Plan that will be affected by the present set of economic circumstances for some time to come. Perhaps a non-political working party of lay people may also have been constructive that would have better insight into the workings of constructing this Plan.

Yours sincerely,

Leo Beirne.

1035

Site Allocations DPD: Regulation 19 Consultation Response

Policy: SA18

ID: 1035

Response Ref: Reg19/1035/1

Respondent: Ms L Edwards

Organisation:

On Behalf Of:

Category: Resident

Appear at Examination? x

[REDACTED]

From: Lindsay Edwards [REDACTED]
Sent: 15 August 2020 11:04
To: ldfconsultation
Subject: Development plan SA19

Dear Sir,

I am writing in response to the details sent to me regarding the development of the Old Police Station in East Grinstead.

I am a long time resident of East Grinstead and I have been lucky enough to live near East Court for the entire time of my residency. The East Court land, including the ancient woodlands of Ashplats wood was given to the people of East Grinstead by the original owners. It is an area that is used by young and old and has been , particularly this year, essential to a many in the town as the only outside space they have access to.

The proposed development of these flats will set a precedent to more development and the potential loss of this wonderful green space to the town. It is all well and good saying that they will install bat and bird boxes but this will not detract from the fact that the improving of the road will massively impact the local wildlife. I am a supporter of Ashplats Conservation Group and regularly volunteer to help care for the woods by undertaking litter picks and pond clearances. We care as a community for this place. It has been here for over 400 years and we are the guardians for the future generations,

I walk to work every day through this area which is beautiful and an asset to the town. There is not a lot in East Grinstead to be grateful for and proud of, especially with the loss of many traditional/original properties to houses and flats, but East Court and the immediate area is definitely one we cannot risk losing. For the sake of current and future generations please do not allow this development.

1381

Site Allocations DPD: Regulation 19 Consultation Response

Policy: SA18

ID: 1381

Response Ref: Reg19/1381/1

Respondent: Mr N Bailie

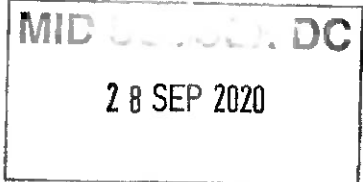
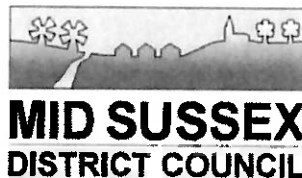
Organisation:

On Behalf Of:

Category: Resident

Appear at Examination? x

To



Site Allocations Development Plan Document Regulation 19

Submission Draft Consultation Form

AND RESPONSE FROM MR. N. BAILLIE, [REDACTED]

The District Council is seeking representations on the Submission Draft Site Allocations Development Plan Document, which supports the strategic framework for development in Mid Sussex until 2031.

The Site Allocations DPD, has four main aims, which are:

- i) to allocate sufficient housing sites to address the residual necessary to meet the identified housing requirement for the district up to 2031 in accordance with the Spatial Strategy set out in the District Plan;
- ii) to allocate sufficient employment land to meet the residual need and in line with policy requirements set out in District Plan Policy DP1: Sustainable Economic Development;
- iii) to allocate a site for a Science and Technology Park west of Burgess Hill in line with policy requirements set out in District Plan Policy DP1: Sustainable Economic Development, and
- iv) to set out additional Strategic Policies necessary to deliver sustainable development.

All comments submitted will be considered by a Planning Inspector, appointed by the Secretary of State, at a public examination to determine whether the plan is sound.

The Site Allocations DPD is available to view at:

www.midsussex.gov.uk/planning-building/development-plan-documents/

A number of documents have been prepared to provide evidence for the Site Allocations DPD and these can be viewed on the Council's website at the above address.

Paper copies will also be at the Council offices (see address below) and your local library and available to view if the buildings are able to open during the consultation period.

Please return to Mid Sussex District Council by midnight on 28th September 2020

How can I respond to this consultation?

Online: A secure e-form is available online at:

www.midsussex.gov.uk/planning-building/development-plan-documents/

The online form has been prepared following the guidelines and standard model form provided by the Planning Inspectorate. To enable the consultation responses to be processed efficiently, it would be helpful to submit a response using the online form, however, it is not necessary to do so. Consultation responses can also be submitted by:

Post: Mid Sussex District Council
Planning Policy
Oaklands Road
Haywards Heath
West Sussex
RH16 1SS

E-mail: LDFconsultation@midsussex.gov.uk

A guidance note accompanies this form and can be used to help fill this form in.

Part A – Your Details (You only need to complete this once)

1. Personal Details

Title	Mr
First Name	NORMAN
Last Name	BAILIE
Job Title (where relevant)	
Organisation (where relevant)	
Respondent Ref. No. (if known)	
On behalf of (where relevant)	NORMAN BAILIE AND JEAN BAILIE
Address Line 1	[REDACTED]
Line 2	[REDACTED]
Line 3	
Line 4	
Post Code	[REDACTED]
Telephone Number	[REDACTED]
E-mail Address	[REDACTED]



Information will only be used by Mid Sussex District Council and its employees in accordance with the Data Protection Act 1998. Mid Sussex District Council will not supply information to any other organisation or individual except to the extent permitted by the Data Protection Act and which is required or permitted by law in carrying out any of its proper functions.

The information gathered from this form will only be used for the purposes described and any personal details given will not be used for any other purpose.

Part B – Your Comments

You can find an explanation of the terms used in the guidance note. Please fill this part of the form out for each representation you make.

Name or Organisation:

3a. Does your comment relate to:

Site
Allocations
DPD

☒

Sustainability
Appraisal

☒

Habitats Regulations
Assessment

☐

Community
Involvement
Plan

☐

Equalities
Impact
Assessment

☐

Draft Policies
Maps

☐

3b. To which part does this representation relate?

Paragraph

Policy SA

Draft Policies Map

PAGE
5461AA 18#

OUR COMMENTS ON THIS PROPOSAL – TO WHICH WE OBJECT – ARE ON REVERSE OF THIS PAGE

4. Do you consider the Site Allocations DPD is:

4a. In accordance with legal and procedural requirements; including the duty to cooperate.

Yes ☒

No ☐

4b. Sound

Yes ☒

No ☐

5. With regard to each test, do you consider the Plan to be sound or unsound:

	Sound	Unsound
(1) Positively prepared	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(2) Justified	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(3) Effective	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(4) Consistent with national policy	<input checked="" type="checkbox"/>	<input type="checkbox"/>

THIS PROPOSAL WOULD INFRINGE THE EXISTING ROOF LINE OF TWO STOREYS (GROUND PLUS ONE) AND WOULD BE ADJACENT TO EXISTING COMMERCIAL OPERATIONS INCLUDING A NURSERY SCHOOL AND AS SUCH WILL PROVIDE HAZARDS DURING AND AFTER CONSTRUCTION.

EXISTING ACCESS ROADS ARE INADEQUATE: AT APPROX 12 FEET WIDE, THESE HAVE FOR MANY YEARS BEEN CLOSED TO THROUGH TRAFFIC AND ARE NOT SUPPORTED BY PAVEMENTS AS THE MAIN PEDESTRIAN ROUTE IS PROVIDED BY THE JUBILEE PATH, HOWEVER BOTH ARE USED BY CHILDREN MORNING AND AFTERNOON AS WELL AS RECREATION SEEKERS AND RESIDENTS YOUNG AND OLD, THROUGHOUT THE DAY.

THE EXISTING DWELLINGS TO THE NORTH OF THIS SITE ARE RESTRICTED TO PARKING CLOSE TO THE NORTH ENTRANCE/EXIT TO EAST COURT: IN ADDITION THEIR BINS ARE KEPT THERE TO MINIMISE SUCH LORRIES' ACCESS.

THE EMERGENCY AMBULANCE STATION IS LOCATED NEARBY AND MAY BE EXPOSED TO DISRUPTION BY CONSTRUCTION VEHICLES DURING THAT PHASE AND BY BIN LORRIES - IF THEY CAN SQUEEZE IN - LATER, NOT TO MENTION THE POTENTIAL 35 ADDITIONAL CARS/VANS GENERATED BY NEW RESIDENTS AND THEIR VISITORS.

THE NORTH ENTRANCE/EXIT TO EAST COURT IS ON A264 HOLTYE ROAD, A HEAVILY USED ARTERY WHICH HAS BECOME BUSIER FOLLOWING RECENT HOUSING DEVELOPMENTS WITH ANOTHER PLANNING PERMISSION ON THE OTHER SIDE GRANTED IN THE LAST 12 MONTHS, TWO MINI ROUNDABOUTS IN CLOSE PROXIMITY AND WHICH IS, ESPECIALLY AT RUSH HOURS, VERY DIFFICULT TO CROSS (EVEN WITH THE ISLAND) AS WE, AT LEAST, CAN ATTEST.

JUST OVER THE WEST BOUNDARY OF EAST COURT IS BLACKWELL HOLLOW WHICH HAS NO PAVEMENTS NOR ROOM TO ACCOMMODATE SUCH LUXURIES BUT IS ONE OF TWO ROUTES TO THE TOWN CENTRE AND CONNECTS A264 HOLTYE ROAD WITH A22 LEWES ROAD (SOUTH) + BEECHING WAY (NORTH), SERVING EN ROUTE THE SOUTH ENTRANCE/EXIT OF EAST COURT, ESTCOTS DRIVE FOR ESTCOTS JUNIOR SCHOOL AND SACKVILLE COMMUNITY COLLEGE. IT IS ALWAYS BUSY, EXACERBATED WHEN THERE IS ANY DISRUPTION ON A264 MOAT ROAD OR ITS JUNCTION WITH A22 LONDON ROAD WHEN THE TEMPTATION TO USE EAST COURT AS A CUT-THROUGH CAN PROVE IRRESISTIBLE.

THIS ILLUSTRATES HOW MANY RESERVATIONS THERE ARE REGARDING THIS SITE: HAD SUSSEX POLICE NOT INDICATED THEIR WILLINGNESS TO REALISE THEIR ASSET, COMPOUNDED BY ADDING ANOTHER STORY (PLUS LAWN?), WE WONDER IF YOU WOULD SUPPORT THIS PLAN WHERE, ACCORDING TO YOUR APPRAISAL "THE DESIGN SHALL RESPECT THE PARKLAND SETTING" AND "UTILISES EXISTING ACCESS ARRANGEMENTS." THIS WOULD BE A LAUDABLE OBJECTIVE WERE IT NOT FOR THE UNSUITABILITY OF THE LOCATION WHICH MAY BE BEST ASSESSED AT RUSH HOURS SO WE RECOMMEND

6a. If you wish to support the legal compliance or soundness of the Plan, please use this box to set out your comments. If you selected 'No' to either part of question 4 please also complete question 6b.

THE KNOWLEDGE THAT WE POSSESS TELLS US THAT THE PLAN IS LEGALLY COMPLIANT AND SOUND, SO WE HAVE OMITTED TO COMMENT TO QUESTIONS 6a + 7

It is

6b. Please give details of why you consider the Site Allocations DPD is not legally compliant or is unsound. Please be as precise as possible.

7. Please set out what change(s) you consider necessary to make the Site Allocations DPD legally compliant or sound, having regard to the reason you have identified at question 5 above where this relates to soundness.

You will need to say why this change will make the Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested change, as there will not normally be a subsequent opportunity to make further representations based on the original representation at publication stage.

After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.

8. If your representation is seeking a change, do you consider it necessary to attend and give evidence at the hearing part of the examination? (tick below as appropriate)

☒

No, I do not wish to participate at the oral examination

☐

Yes, I wish to participate at the oral examination

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

10. Please notify me when:

- (i) The Plan has been submitted for Examination
- (ii) The publication of the recommendations from the Examination
- (iii) The Site Allocations DPD is adopted

☐☐☒

Signature:

Date:

24th September 2020

Thank you for taking time to respond to this consultation

Site Allocations DPD: Regulation 19 Consultation Response**Policy:** SA18**ID:** 1392**Response Ref:** Reg19/1392/3**Respondent:** Mr F Berry**Organisation:****On Behalf Of:****Category:** Resident**Appear at Examination?** x

[REDACTED]

From: Frank Berry [REDACTED]
Sent: 28 September 2020 23:38
To: ldfconsultation
Subject: MSDC Site Allocations DPD (Regulation 19) Consultation

I wish to object to the above DPD (Regulation 19) for several reasons, which I have detailed below:

I. Legally Compliant

I do not consider MSDC have been compliant with its **Statement of Community Involvement, as required under the National Planning Policy Framework (NPPF).**

I was alerted to the existence of the consultation for the Site Allocations DPD (Regulation 18) by a MSDC Councillor, and therefore made comments at that time. However, when I made a search of the MSDC website a few weeks ago, I had trouble locating any progress on this until I eventually found the Site Allocations DPD (Regulation 18) 9th October – 20th November 2019 Consultation Report. This contained the feedback that I sought i.e. comments made by statutory bodies, organisations and members of the public, including actions made by Officers to address objections. I noted the low response for sites relating to East Grinstead i.e. SA18 East Grinstead Police Station (31), SA19 Crawley Down Road (38), and SA20 Imberhorne Lane (69). Given that many people will have made comments to more than one site, this means that possibly less than 100 comments were received in total relating to the above sites out of a population in excess of 30,000. I have personally accessed the current (Regulation 19) documents, but I am concerned that when I searched for 'open consultations/existing consultations' on the website last week, the answer came back that there were no current consultations! This could lead once again to a very low response rate, and you will not receive the feedback about your proposals from a larger number of members of the public that are needed.

I note that the **MSDC Community Involvement Plan (CIP)**, issued in July 2020 states that it should "Be inclusive" and "Accessible to all who wish to take part", and the communication vehicles proposed were a press release, an email alert and "utilise social media". There are a limited number of residents who buy/read a 'local' newspaper these days, so the press release with the information would not have reached many people. The email alert is only effective for those who have signed up to receive the information, so again I suggest this would have reached a very low number, given the low responses given above. Utilising social media would reach a much wider audience in East Grinstead, but regular users of social media have advised me that they do not recall seeing anything from MSDC on various local social media websites alerting users to this consultation.

I understand that WSCC libraries were closed at the outset of the Coronavirus Lockdown, but did you/did you consider posting a notice on the library door in East Grinstead to alert a wider audience? Although the library was shut for a considerable length of time, it has re - opened in phases, so more visits have been made in recent months

2. Soundness

There is a requirement within the NPPF for the Plan to be 'Sound', but there are various aspects which I consider to be unsound, mainly relating to the statements regarding providing infrastructure and highways improvements.

2.1 Justified

a) There are too many dwellings proposed at SA19 Crawley Down Road (200) and SA20 Imberhorne Lane (550) to be justified. The Plan allocates Sites across Mid Sussex District to meet the needs of Mid Sussex and also that of Crawley, but these developments are far too large to be justified. Even without the current downturn in the Economy and effect on jobs at Gatwick and Crawley which makes these plans questionable, these developments are too large and will create problems for the new and existing residents of Felbridge and East Grinstead. The existing infrastructure cannot cope with an additional estimated 2,500 – 3,000 people, who will need to access to GP Surgeries, Dentists etc., and the Highways network will also need a major configuration to prevent gridlock in parts of East Grinstead and Felbridge. In support of this, I refer to the **MSDC Site Allocations DPD – Sustainability Appraisal – February 2020** i.e.

NPPD 2.4 Sustainable Development

This states that “It is about ensuring better quality of life for everyone, now and for generations to come”. I do not consider sitting in traffic hold – ups, having to travel to places outside of East Grinstead to access GP’s and Dentists, searching for parking spaces etc. to be “better quality of life”.

NPPD 2.6 an economic objective

This states “and by identifying and coordinating the provision of infrastructure”. However, most of the references contained within DPD (Regulation 19) regarding the East Grinstead Sites are vague. (see examples in my specific comments to SA18, SA19 and SA20 below).

NPPD 2.6 a social objective

This states “with accessible services and open spaces that reflect current and future needs and support health, social and cultural well – being”. The DPD (Regulation 19) Plan falls short on the detail as to how this will be achieved. Existing services will be inadequate to support the needs of an additional 10% of the existing population of East Grinstead and Felbridge. (see examples in my specific comments to SA18, SA19 and SA20 below).

NPPD 2.15 Consultation and Implementation

This states “Consultation withand members of the Community”. I do not think this has been adequate (see 1. Legally Compliant above).

Human Characteristics

The MSDC Site Allocations DPD, as in the District Plan, states that Mid Sussex has an aging population, which will need healthcare and social services provision. The Plan has identified that the District has a shortage of smaller 1 and 2 bedroom dwellings, which could suit older persons, but what will be the type of dwellings to be built on these sites? There should be an additional requirement to enforce a larger number of ‘affordable’ dwellings on these sites, rather than the usual maximum of 10% that currently exists. Developers will want to build larger 3 and 4 bedroom homes as these are more profitable, but any developments should reflect the needs of the District.

Households

“The increasing population locally and nationally is a key factor in the growing number of households and may present challenges where infrastructure cannot be improved or additional capacity created to meet increased demand from new households”. This is my point: it WILL present PROBLEMS in and around East Grinstead if these developments proceed as planned. There are no specific proposals to improve the infrastructure.

Housing Stock

There is a very low number of ‘affordable housing’ in Mid Sussex, so an increase in numbers is needed. However, the National Government’s definition of affordable housing bears little resemblance to reality; ‘affordable’ housing on new developments means very little to those seeking new/first homes if the average price within the development is £500,000.

Roads and Transport

“A number of interventions such as improved signalling, junction improvements and priority bus corridors may be necessary to support proposed growth”. In East Grinstead and Felbridge this WILL be required, but again there is a lack of detail in the DPD (Regulation 19) Plan.

Air Quality

The current air quality has already been identified as being poor in East Grinstead, which can only get worse with the additional volumes of traffic resulting from these developments. There are already traffic hold – ups, so unless major improvements are made to the road network, there will be additional harmful emissions due to queuing traffic.

In – Combination Effects: Conclusions

1 - Housing

“.....This supports the sustainability objective to ensure that everyone has the opportunity to live in a home suitable to their needs and which they can afford”. See my comments above.

2 – Health

This states that all sites will be required to support the provision of healthcare infrastructure in Mid Sussex. “This might be through direct provision a facility, provision of land, or through a financial contribution”. I know that S106 contributions are made currently and planned for these Sites, but that does not mean that a new GP surgery/health centre will be built, or an existing practice extended, due to constraints. Two GP surgeries were due to merge some years ago in East Grinstead, but this did not happen. However, people have continued to come to live in East Grinstead, and cannot access these services as they cannot take anymore additional patients. A 200 dwelling development is planned at Hill Place Farm, and there are no infrastructure plans to cater for the increased population and its needs.

Transport

This states that “None of the site options on their own are likely to contribute to negative impacts on the highways network”. I disagree: 550 additional homes at Imberhorne Lane will create lots of highway problems: it is proposed that the entrance to the new development will be on Imberhorne Lane, where traffic already tails back at peak times. Traffic trying to emerge from the estate (with a likely vehicle ownership in excess of 800) will only exacerbate these problems. 200 homes at Crawley Down Road will also cause highways problems, due to the site’s proximity to the road junction with the A264. Although mention is made about the possibility of improving this junction, it is likely to have a knock – on effect to the Felbridge traffic lights and even the Imberhorne Lane area. Several Reports (Atkins and Jubb) have highlighted the problems of traffic saturation at Imberhorne Lane/Felbridge junction, so an additional 750 dwellings with associated vehicle movements will result in traffic delays on a daily basis.

2.2 Effective

The infrastructure and highways improvement plans are too vague for this Plan to be effective.

2.3 Consistent with National Policy

The Plan should enable the delivery of sustainable development, but due to the insufficient evidence of infrastructure improvements in the **MSDC Infrastructure Delivery Plan** and lack of plans as to how traffic congestion relief will be achieved in East Grinstead and Felbridge, the above statement cannot be justified.

Community Infrastructure Levy

I am aware of the various S106 monies that have been specified for individual Sites, but does MSDC have plans to implement a CIL policy as a means to raise money for infrastructure that will be required in East Grinstead?

Site Specific Comments

SA18 East Grinstead Police Station

I note the comment “taking account of potential development opportunities that exist immediately beyond the site boundaries to ensure future redevelopment are not hindered”. What are these? Compulsory Purchase of the Old Court House which currently is in the ownership of East Grinstead Town Council? You need to be specific.

As the driveway at East Court is in the ownership of East Grinstead Town Council, there should be a contract with the developer to reinstate the drive to EGTC’s satisfaction should damage be caused during the building of the proposed apartments.

Adequate parking needs to be provided on – site to prevent infringements on the car parking area of East Court.

Improvements will need to be made at the Entrance to East Court from Escots Drive as there will be additional vehicle movements, to improve sight lines.

SA19 Crawley Down Road

There is a likelihood of coalescence occurring with this development and that of SA20 Imberhorne Lane in the future; this should not be allowed.

I note it says that “Provide a Sustainable Transport Strategy which identifies sustainable transport infrastructure improvements”. Mention is made of routes for walking, cycling and public transport, but where is the evidence that independent bus companies will extend their routes onto the new development?

It says MSDC will contribute towards providing any necessary and safety improvements to junctions impacted along the A22/A264 corridor, but they are not specific; if a development of this scale is planned, the associated highways improvements that will be necessary should be planned and made known at the same time. The contribution to the A22/A264 corridor junction improvements shows no estimated cost or contribution for S106 monies from the developer. These should be identified and published, as the improvements will be necessary as a direct consequence of the development. The timescale shown is 1 – 5 years, so plans for highways improvements need to be made now.

SA20 Imberhorne Lane

There is a likelihood of coalescence occurring with this development and that of SA19 Crawley Down Road in the future; this should not be allowed. The MSDC Design Guide for developers encourages them to ‘end’ developments with an ‘open’ road layout and not cull – de – sacs, to permit future development, but it should be made clear that there will be no extension to this or the SA19 Crawley Down Road development to prevent coalescence from occurring.

A Neighbourhood Centre is proposed, but what will be there? On earlier Plans the developer stated that a GP surgery was planned, but now it says “address increase demand for GP Services either on – site or by financial contribution to support expansion of existing local GP practices. See my comments under Health: there are expansion constraints on the 3 existing GP surgeries, and if one is not built on – site the future patients will not have a GP practice they can attend.

If this development is built, there will be numerous vehicle movements in and around East Grinstead in addition to Imberhorne Lane, due to the new occupiers accessing shops, the railway station, doctors, dentists (if they are accepted), hospital, leisure facilities etc. This will put pressure on the existing highways network.

A major change to the highways network will be required at Imberhorne Lane and Felbridge if this Plan is approved, but the detail of how this will be done to alleviate traffic and pollution problems is sadly lacking in detail in this Plan.

Frank Berry

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

1436

Site Allocations DPD: Regulation 19 Consultation Response

Policy: SA18

ID: 1436

Response Ref: Reg19/1436/1

Respondent: Ms M Collins

Organisation:

On Behalf Of:

Category: Resident

Appear at Examination? x

Name	Margaret Collins
Job title	Local resident
Organisation	-
Respondent ref. number	-
On behalf of	Myself
Address	[REDACTED]
Phone	[REDACTED]
Email	[REDACTED]
Name or Organisation	Local resident
Which document are you commenting on?	Site Allocations DPD
Sites DPD Policy Number (e.g. SA1 - SA38)	SA18, SA19, SA 20, SA35
Do you consider the Site Allocations DPD is in accordance with legal and procedural requirements; including the duty to cooperate	Yes
(1) Positively prepared	Unsound
(2) Justified	Unsound
(3) Effective	Unsound
(4) Consistent with national policy	Sound
Please outline why you either support or object (on legal or soundness grounds) to the Site Allocations DPD	<p>SA18 - East Grinstead Police station site - 22 number of dwellings. How many parking slots per housing unit will be provided? Is it incorrectly anticipated there will be spare capacity in the current East Court car parks?</p> <p>The questions of the East Court through road ownership, maintenance & access at both ends of the through road have not been addressed in the document.</p> <p>SA 19 -Land south of Crawley Down Road - 200 dwellings. Access on to the A264 currently causes tailbacks at the junction with the Crawley Down Road. If it is acceptable that it is " not deemed appropriate to add capacity, solutions shall include measures to boost sustainable modes and/or re-route traffic" I think more information is required before decisions are taken re further additional vehicular movements.</p> <p>SA20 - I welcome the expansion of Imberhorne School which should as a consequence be able to house the whole school on one site.</p> <p>SA35 - Safeguarding of land and delivery of Strategic Highway improvements. I am concerned that finance will be wasted on further studies of the three junctions on the A22 - Felbridge, Imberhorne Lane & Lingfield Road. The need for a radical improvement for traffic flow on the A22 has been recognised in previous studies sponsored by West Sussex County Council.</p>

Please set out what change(s) you consider necessary to make the Site Allocations DPD legally compliant or sound, having regard to the reason you have identified at question 5 above where this relates to soundness.	The problems of traffic flow on the A22 & A264 leading to the Felbridge junction and the London Road have been recognised for many years. Air quality issues need to be addressed and the considerable inconvenience to local residents, local businesses and through traffic have a detrimental effect. The traffic problems should be addressed and solutions implemented prior to any further dwellings in the area.
If you wish to provide further documentation to support your response, you can upload it here	
If your representation is seeking a change, do you consider it necessary to attend and give evidence at the hearing part of the examination	No, I do not wish to participate at the oral examination
Please notify me when-The Plan has been submitted for Examination	yes
Please notify me when-The publication of the recommendations from the Examination	yes
Please notify me when-The Site Allocations DPD is adopted	yes
Date	31/08/2020

Site Allocations DPD: Regulation 19 Consultation Response

Policy: SA18

ID: 1442

Response Ref: Reg19/1442/1

Respondent: Ms M Baldwin

Organisation:

On Behalf Of:

Category: Resident

Appear at Examination? x

[REDACTED]

From: [REDACTED]
Sent: 07 September 2020 15:33
To: planningpolicy
Subject: SA20, SA19,SA22, SA18

Dear Sir/Madam,

I am writing to express my concerns over the above proposals. I believe that there isn't currently a housing shortfall in East Grinstead and the area is becoming more and more crowded. The traffic through East Grinstead and at the junctions of the A264 and Imberhorne Lane already struggles without adding more cars to the roads. It is already nearly impossible to get a doctors/dentist appointment in the area and adding more homes to the mix will only make the problem worse. Most of the land under consideration is a haven to wildlife and it would be tragic to lose this in the already overbuilt up South East. While I have no problem with builds on Brownfield sites or infilling between current properties I feel it would be detrimental to local people to lose any more green space especially in this time of climate change. Even if allocations are made for the wildlife after the houses are built, the damage will already be done during the development stages.

I am deeply disappointed that any of these are even being considered.

Yours Sincerely
Melanie Baldwin

[REDACTED]

See my blog at [REDACTED]

1478

Site Allocations DPD: Regulation 19 Consultation Response

Policy: SA18

ID: 1478

Response Ref: Reg19/1478/1

Respondent: Ms J Holdaway

Organisation:

On Behalf Of:

Category: Resident

Appear at Examination? x

[REDACTED]

From: Joyce Holdaway [REDACTED]
Sent: 17 September 2020 12:43
To: ldfconsultation
Subject: Proposed new developments east grinstead and felbridge

Follow Up Flag: Follow up
Flag Status: Completed

Categories: SiteDPD

I would like to register my disapproval of any housing development in these areas due to the fact that the present infrastructure is already at saturation point.

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1487

Site Allocations DPD: Regulation 19 Consultation Response

Policy: SA18

ID: 1487

Response Ref: Reg19/1487/1

Respondent: Mr A Fennell

Organisation:

On Behalf Of:

Category: Resident

Appear at Examination? x

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

Date: 18th September 2020

Dear Sir/Madam

Mid-Sussex Consultation for new Homes – East Grinstead and Surrounding Area

I am writing to lodge my views in respect of the Mid Sussex consultation for the allocation of new homes at the following sites

550 homes at Imberhorne Farm

200 homes at Felbridge

50 homes at Crawley Down

22 homes at East Grinstead Police Station.

I have broken down my objections by category, as follows;

Failure to Consult

The National Planning Policy Framework [NPPF] requires councils to carry out public consultation on plans that is transparent and front-loaded (ie. at the earliest opportunity)

Paragraph 16 says that “Plans should be shaped by early, proportionate and effective engagement between plan makers and communities, local organisations, businesses, infrastructure providers and operators and statutory consultees”

Mid Sussex’s own Statement of Community Involvement says that ...

“... the community should be involved as early as possible in the decision making process when there is more potential to make a difference” and that

“... community involvement should be accessible to all those who wish to take part”

“It is important to seek input from the wider public, as the Plan will allocate sites for development in the district and include planning policies that will have an impact upon the existing and future communities”

The district council leadership team at Haywards Heath claim to have met their obligation to consult with residents by ...

- Issuing a press release
- Email alerts (to the few people with prior knowledge of the consultation and registered their email address)
- Comments on the Council's social media channels
- Posts on the Council's website
- Exhibition boards in the public library (library staff knew nothing about it)

Evidence suggests that these communication channels have been ineffective and in no way extensive as is required by Mid Sussex own policies.

When asked about the press release to notify residents of the consultations, officers at Mid-Sussex say that they issued the press release to ...

2 TV outlets, 6 radio stations, 4 newspapers, 3 news agencies, 6 magazines (but not their own in-house magazine) and 3 websites

When challenged to confirm which outlets actually broadcast or published the press release, the council's communication team say only that they "*were aware that the Mid Sussex Times ran a story on 30th July regarding the consultation.*" A paper only servicing the towns of Burgess Hill and Haywards Heath

On the district council website, neither the main landing page nor main 'Planning and Building' page make reference to the consultation. The Council's dedicated 'Consultations' page advertises only a Public Spaces Protection Order – Dog Control Consultation'

The district council leadership decided not to advertise either of the site allocation consultations in their own Mid Sussex Matters magazine, which is distributed at taxpayer expense by the council's communication team 3 times a year to 73,000 homes in Burgess Hill, East Grinstead, Haywards Heath and Mid Sussex villages.

They say that "*Wherever possible, details of forthcoming consultations are included within the magazine, this is our preference as it reaches every household in the district. However publication dates and consultation dates do not always coincide.*"

The Spring 2020 edition failed to mention the site allocations consultation but did manage to alert readers to the review of the local plan not due to start until 2021.

The Summer edition was published on the 6th July but failed to mention the site allocations consultation but in the same month readers in Haywards Heath and Burgess Hill were alerted to it in their Mid Sussex Times.

The evidence clearly shows that there was no intention on the part of the district council leadership team in Haywards Heath to alert residents of East Grinstead to the site allocations consultation.

On the above basis I would submit there has been a failure to consult, in line with Mid-Sussex own policy requirement. Given this, it is difficult to envisage how this can be classified as a final consultation (when the first hasn't happened) and the second is inadequate. I request that the process is begun again.

Unsound Assessment of Sites Alternative sites unreasonably discarded

Deliverable sites nearer to Crawley have been dismissed without proper regard for their overall sustainability and without being assessed against any of the planning considerations that the sites proposed for East Grinstead were.

National planning policy insists that development plans are prepared on the basis that all reasonable alternatives have been explored. The National Planning Policy Framework (NPPF) says at paragraph 35 that plans will only be found sound if they are ... *"Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence"*

For example, the site put forward at Crabbett Park could provide up to 2,500 homes close to the Crawley Fastway public transport system; allowing future residents ready access to Crawley's extensive services, infrastructure and employment opportunities. It would also provide for future expansion for housing needs in the future.

The district council leadership say that all sites must conform to the 'contiguous with an existing settlement' rule set out in district plan policy DP6. This policy is insufficiently flexible and was not designed to take account of housing shortfalls in neighbouring authorities.

NPPF paragraph 81 says that *"planning policies should be flexible enough to accommodate needs not anticipated in the plan"*

District council planning officers confirm that the site at Crabbett Park was rejected due its lack of 'Connectivity with existing settlements'. They say that ...

"The criteria established to assess the degree of separation is based on a distance of 150m from the built up area boundary (as defined on the Policies Maps). 150m represents a distance that the Council considers differentiates between being connected or remote from existing settlements."

This is factually incorrect - the site at Crabbett Park is less than 100m from the Crawley built-up boundary, meaning that the selection process was unsound and the site rejected on spurious grounds.

For sites not rejected 'out of hand', the district council leadership approved a selection methodology based on sites being assessed using 17 different planning criteria and rated on a 5 tier traffic light grading system. The combined grading was then used to determine whether the proposed site was a "high performing site" or not.

All sites assessed in East Grinstead were evaluated as 'high performing sites' and therefore allocated in the draft development plan. However, the overall performance assessment did not adequately account for the widely reported traffic constraints or the relevant neighbourhood plan policies

Site Selection Criteria ID 196 – Crawley Down Road Felbridge

Site Selection Criteria ID 770 - Imberhorne Farm

The site assessment section on highways, arguably the most relevant to the sites in East Grinstead, was left blank. When challenged, district council officers say that they can only assess the traffic situation by looking at all the proposed sites together and claim that when they do that, the traffic model shows that congestion is not bad enough to count.

The neighbourhood plan policies were simply referenced without any comment on how they were assessed. Policies EG2 and EG11 weigh heavily against the proposed site allocations at Felbridge and Imberhorne Farm.

However, no evidence is presented to show that policies EG2 or EG11 were genuinely considered or that they played any role in the overall assessment of sites, despite district council officers highlighting their importance.

Therefore I would contend that Mid Sussex have breached their own policy and procedures and should begin the process again of evaluation to ensure these are met.

Unsustainable Traffic Congestion

Mid Sussex and Tandridge jointly commissioned WSP to undertake a traffic study into the Felbridge A264/22 junction capacity. In October 2019 it confirmed what residents already know - the junction is already severely congested ...

"The Felbridge junction has been identified as a constraint to development coming forward in Tandridge and the Felbridge/East Grinstead area. The junction currently operates above capacity leading to congestion during peak periods and at other times of the day."

The congestion figures for the A264 approach arm were measured as ...

	AM Peak	PM Peak
Junction Capacity *	106.60%	101.40%
Vehicle Queue Length	48	33
Queuing Delay	3 mins 2 secs	1 min 55 secs

Despite this, there are a further 1,230 homes already approved in East Grinstead and another 835 already approved in the surrounding villages of Ashurst Wood, Copthorne, Crawley Down and Turners Hill.

The Mid Sussex strategic transport study by SYSTRA reports that most major junctions in East Grinstead and surrounding area will be over-capacity once all the approved homes have been built, but suggest that this isn't a reason to resist the extra 820 houses now being proposed.

The district council leadership at Haywards Heath say that there is no need to worry about the additional traffic from the extra 822 houses being proposed for East Grinstead and Crawley Down because once a junction reaches capacity drivers will redirect their journeys, in other words they will 'rat run' along residential roads and country lanes

“Once the model reaches capacity at a location, delay will increase significantly, and extensive rerouting will occur if alternative faster routes are available”

The SYSTRA transport model predicts that the 822 houses being proposed will significantly increase the current levels of 'rat running' along residential streets and country lanes. The district council leadership say that this isn't necessarily a cause for concern.

The SYSTRA transport model uses adjusted traffic data from 2008, which significantly understates the existing levels of congestion at the A264/A22 junction in Felbridge, compared with the more recent jointly commissioned WSP traffic model.

	SYSTRA Model		WSP Model	
	AM Peak	PM Peak	AM Peak	PM Peak
Junction Capacity	61%	65%	106.60%	101.40%
Vehicle Queue Length	2	3	48	33
Queuing Delay	15 secs	21 secs	3 mins 2 secs	1 min 55 secs

The district council leadership must be aware of the flaws in their SYSTRA model but choose not to publish the findings of the more recent WSP traffic study (which they themselves jointly commissioned). Material evidence which could undermine the

suitability of the proposed site allocations in East Grinstead has been withheld from the consultation process.

Notwithstanding the flaws in the SYSTRA transport model that understate the current traffic congestion, the district council leadership say that the 822 proposed houses on their own do not constitute a severe impact on our local roads.

Neither do they accept that the 822 proposed houses together with 1,230 houses already approved in East Grinstead plus the 835 houses already approved in the surrounding villages constitutes a severe impact on local roads despite their own SYSTRA model saying that committed housing will result in the following junctions being over capacity;

- A264/A22 Felbridge
- A22/Imberhorne Lane
- B2110/B2028 Crossroads Turners Hill
- B2028 Turners Hill Road/Wallage Lane
- A264/A2220 Copthorne

The district council leadership say that they can only assess the highways impact for the each proposed site allocation by looking at them all together (ie. the ones in East Grinstead, Burgess Hill, Haywards Heath and other towns and villages in the district) in accordance with the national planning policy.

The National Planning Policy Framework (NPPF) says at paragraph 109 that *“Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.”*

The SYSTRA transport model clearly demonstrates that the cumulative impact of the houses already approved (but not yet built) taken together with the proposed housing allocations is severe.

In order to mitigate the impact of the additional traffic from the 822 proposed houses, the district council leadership make vague references to A264/A22 corridor improvements and an unspecified bus priority along the A22. They say that

“The local highway network will be re-examined in more detail through any subsequent planning applications on the sites proposed for East Grinstead”

“Joint working between Surrey CC and West Sussex CC along with Mid Sussex and Tandridge District Council’s is ongoing to determine how best to improve capacity along the A22/A264 corridor”

In other words, there are no firm proposals to resolve the current levels of congestion let alone the gridlock that is likely to result from the extra 2,065 houses already approve and yet we are expected to accept on trust that the unspecified roads

improvements will be so successful that they will be able to accommodate the traffic from the extra 822 houses now proposed.

The jointly commissioned WSP transport study to look into capacity issues for the A264/22 Felbridge junction has been running for nearly two years and has not identified a single option that promises to bring the junction back within capacity for the longer term.

Given the fact that a limit has been reached on approaching roads, and no viable alternative has been set out, I would recommend that the proposal is re-worked to take into consideration the traffic impact and viable alternatives proposed. Without this it can't realistically proceed.

Contrary to Neighbourhood Plan

The town council spent considerable time and resources on its Neighbourhood Plan, it was approved by the district council leadership, found to be sound at the public examination and overwhelmingly supported by referendum.

A meeting on 3rd May 2018 attended by both the town and district councils reviewed the Neighbourhood Plan policies against the newly adopted District Plan. The town council's planning committee minutes dated 18th May confirms that apart from policy EG5 – Housing, "the other policies in the plan are not deemed to be in non-compliance"

People expect the town council to strongly defend its Neighbourhood Plan and not simply accept the district council leadership view that it's policies are 'trumped' by their own.

Policy EG2 was designed to resist development outside the built-up boundary and *"to ensure that development does not result in the gradual accretion of development at the urban fringe"*. This fully supports the district council's own policy DP12 which says ...

"The primary objective of the District Plan with respect to the countryside is to secure its protection by minimising the amount of land taken for development and preventing development that does not need to be there."

The proposed site allocations at Felbridge and Imberhorne Farm are outside the East Grinstead built-up boundary and are therefore against both neighbourhood and district plan policies. It is not clear why does the district council leadership believe the houses to meet the housing shortfall in Crawley need to be in the countryside just outside East Grinstead's urban boundary

The supporting text to policy EG2 (at paragraph 4.9) explicitly calls out for development to be refused in the areas of countryside at Imberhorne Farm and south of the Crawley Down Road.

The district council leadership do not accept the validity of the neighbourhood plan supporting text and brush-off the town council's assertion that it must be taken into account when considering potential site locations. They say that the *"Inclusion of supporting text may lead to potential for conflicting guidance."* This is clearly disingenuous as the district council leadership approved the content of the neighbourhood plan before it went to examination

Policy EG11 was designed to ensure that East Grinstead didn't have to take mass housing allocations like these without the necessary improvements to the local highways network ...

Proposals, which cause a severe cumulative impact in terms of road safety and increased congestion, which cannot be ameliorated through appropriate mitigation will be refused

Policy EG11 fully supports the district council's own policy DP21 which requires that ... *"development is accompanied by the necessary infrastructure in the right place at the right time that supports development and sustainable communities. This includes the provision of efficient and sustainable transport networks"*

Currently there are no detailed proposals to solve the existing traffic problems in East Grinstead. Unless and until such proposals are put forward which are shown to be both effective in resolving the junction capacity issues and deliverable, then the proposed site allocations at Felbridge and Imberhorne Farm are against both neighbourhood and district plan policies.

I will be making available a copy of this letter to my MP and would be grateful for a response to the issues I have raised.

Yours Sincerely

Anthony Fennell

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

1577

Site Allocations DPD: Regulation 19 Consultation Response

Policy: SA18

ID: 1577

Response Ref: Reg19/1577/3

Respondent: Mr and Mrs A+K Corsie

Organisation:

On Behalf Of:

Category: Resident

Appear at Examination? x

[REDACTED]

From: Ken Corsie [REDACTED]
Sent: 19 September 2020 21:11
To: ldfconsultation
Subject: Housing Proposals for Imberhorne Farm, East Grinstead, Felbridge & Crawley Down.

Dear Sirs,

My wife and I are horrified and dismayed to receive information from Infrastructurefirst.co.uk which came through our letter box, concerning the proposed developements at the above sites.

Over many years we were members of the Imberhorne Residents Association, who as you know were very active for a long time in helping to enable many decisions to be agreed, which have proved most helpful to not only our Town Council, but also to Mid Sussex District Council, enabling many sensible suggestions to be adopted for successful development of the Neighbourhood Plan, alongside ideas for Traffic Management Schemes and Local Infrastructure.

In the past, we have usually found a great willingness by Mid Sussex District Council to take careful steps in advising local residents of any forthcoming plans for further developments in our areas, but on this occasion such notification has been sadly missing; whether this is due to the Corona Virus Lockdown and ongoing staffing problems since the Pandemic started to affect the U.K. in the March/April period or not, I don't know, but on this occasion we heard absolutely nothing of these major and extensive plans to build:

- 1/. 550 houses at Imberhorne Farm, on land which is of outstanding natural beauty, with clear views across the countryside towards the North Downs; used by many walkers and cyclists; many of whom are parents with children learning to cycle safely, on a proper concrete pathway, (giving them the experience of cycling on a surface similar to a roadway), whilst enjoying their countryside surroundings; also being home to many species of animals, birds, fauna, plants and invertebrates.

- 2/. 200 houses at Felbridge.

- 3/. 50 houses in Crawley Down.

- 4/. 22 houses at the East Grinstead Police Station Site.

These proposed developments, which will have major impact within our localities, should be aired properly; structured to give concise, but fully accurate information, together with a realistic time schedule to enable proper public scrutiny to allow properly developed responses to be made about the Infrastructure, the Accessibility, the impact on the present Neighbourhood Plan, Road Access and Traffic Management, (together with it's impact on existing road systems feeding traffic into this area of West Sussex and Surrey), including the impact on the existing state of traffic congestion in this area.

It should be remembered that the attempts to plan improvements to the road systems around East Grinstead, etc. including the previous Imberhorne Farm Development Plans, such as the East Grinstead Bypass, were a total disaster and shouldn't therefore be conveniently forgotten during any further plans concerning this area, as this will remain a major stumbling block to any such development.

From our perspective, it appears that on this occasion, Mid Sussex District Council have failed miserably to both inform and seek to work alongside residents on the development of plans which will have a major impact on this area of West Sussex and Surrey; not to mention the impact on the present residents!

Annette & Ken Corsie - [REDACTED]

1723

Site Allocations DPD: Regulation 19 Consultation Response

Policy: SA18

ID: 1723

Response Ref: Reg19/1723/1

Respondent: Mrs J Roberts

Organisation:

On Behalf Of:

Category: Resident

Appear at Examination? x

[REDACTED]

From: [REDACTED]
Sent: 24 September 2020 11:54
To: ldfconsultation
Subject: Site allocations and Development Plan Document
Attachments: Site Allocations and Development Plan Document.docx

Follow Up Flag: Follow up
Flag Status: Completed

Categories: SiteDPD

Site Allocations and Development Plan Document DPD) - July 2020

Please find attached my comments on this plan.
They relate in particular to sites in the DPD : SA18, SA19, SA20 and to general comments

Joan Roberts (Mrs)

[REDACTED]

1808

Site Allocations DPD: Regulation 19 Consultation Response

Policy: SA18

ID: 1808

Response Ref: Reg19/1808/1

Respondent: Mr M Mitchell

Organisation:

On Behalf Of:

Category: Resident

Appear at Examination? x

[REDACTED]

From: enquiries
Sent: 25 September 2020 09:13
To: planninginfo
Subject: FW: Mid-Sussex Consultation for new Homes- East Grinstead and surrounding area

One for planning...

From: Mike Mitchell [REDACTED]
Sent: 24 September 2020 19:31
To: enquiries <enquiries@midsussex.gov.uk>
Subject: Mid-Sussex Consultation for new Homes- East Grinstead and surrounding area

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

Date: 24 September 2020

Dear Sir/Madam

Mid-Sussex Consultation for new Homes – East Grinstead and Surrounding Area

I am writing to lodge my views in respect of the Mid Sussex consultation for the allocation of new homes at the following sites

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Site Selection Criteria ID 196 – Crawley Down Road Felbridge

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The site assessment section on highways, arguably the most relevant to the sites in East Grinstead, was left blank. When challenged, district council officers say that they can only assess the traffic situation by looking at all the proposed sites together and claim that when they do that, the traffic model shows that congestion is not bad enough to count.

The neighbourhood plan policies were simply referenced without any comment on how they were assessed. Policies EG2 and EG11 weigh heavily against the proposed site allocations at Felbridge and Imberhorne Farm.

However, no evidence is presented to show that policies EG2 or EG11 were genuinely considered or that they played any role in the overall assessment of sites, despite district council officers highlighting their importance.

Therefore I would contend that Mid Sussex have breached their own policy and procedures and should begin the process again of evaluation to ensure these are met.

Unsustainable Traffic Congestion

Mid Sussex and Tandridge jointly commissioned WSP to undertake a traffic study into the Felbridge A264/22 junction capacity. In October 2019 it confirmed what residents already know - the junction is already severely congested ...

"The Felbridge junction has been identified as a constraint to development coming forward in Tandridge and the Felbridge/East Grinstead area. The junction currently operates above capacity leading to congestion during peak periods and at other times of the day."

The congestion figures for the A264 approach arm were measured as ...

	AM Peak	PM Peak
Junction Capacity *	106.60%	101.40%
Vehicle Queue Length	48	33
Queuing Delay	3 mins 2 secs	1 min 55 secs

Despite this, there are a further 1,230 homes already approved in East Grinstead and another 835 already approved in the surrounding villages of Ashurst Wood, Copthorne, Crawley Down and Turners Hill.

The Mid Sussex strategic transport study by SYSTRA reports that most major junctions in East Grinstead and surrounding area will be over-capacity once all the approved homes have been built, but suggest that this isn't a reason to resist the extra 820 houses now being proposed.

The district council leadership at Haywards Heath say that there is no need to worry about the additional traffic from the extra 822 houses being proposed for East Grinstead and Crawley Down because once a junction reaches capacity drivers will redirect their journeys, in other words they will 'rat run' along residential roads and country lanes

"Once the model reaches capacity at a location, delay will increase significantly, and extensive rerouting will occur if alternative faster routes are available"

The SYSTRA transport model predicts that the 822 houses being proposed will significantly increase the current levels of 'rat running' along residential streets and country lanes. The district council leadership say that this isn't necessarily a cause for concern.

The SYSTRA transport model uses adjusted traffic data from 2008, which significantly understates the existing levels of congestion at the A264/A22 junction in Felbridge, compared with the more recent jointly commissioned WSP traffic model.

	SYSTRA Model		WSP Model	
	AM Peak	PM Peak	AM Peak	PM Peak
Junction Capacity	61%	65%	106.60%	101.40%
Vehicle Queue Length	2	3	48	33
Queuing Delay	15 secs	21 secs	3 mins 2 secs	1 min 55 secs

The district council leadership must be aware of the flaws in their SYSTRA model but choose not to publish the findings of the more recent WSP traffic study (which they themselves jointly commissioned). Material evidence which could undermine the suitability of the proposed site allocations in East Grinstead has been withheld from the consultation process.

Notwithstanding the flaws in the SYSTRA transport model that understate the current traffic congestion, the district council leadership say that the 822 proposed houses on their own do not constitute a severe impact on our local roads.

Neither do they accept that the 822 proposed houses together with 1,230 houses already approved in East Grinstead plus the 835 houses already approved in the surrounding villages constitutes a severe impact on local roads despite their own SYSTRA model saying that committed housing will result in the following junctions being over capacity;

- A264/A22 Felbridge
- A22/Imberhorne Lane
- B2110/B2028 Crossroads Turners Hill
- B2028 Turners Hill Road/Wallage Lane
- A264/A2220 Copthorne

The district council leadership say that they can only assess the highways impact for the each proposed site allocation by looking at them all together (ie. the ones in East Grinstead, Burgess Hill, Haywards Heath and other towns and villages in the district) in accordance with the national planning policy.

The National Planning Policy Framework (NPPF) says at paragraph 109 that *"Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe."*

The SYSTRA transport model clearly demonstrates that the cumulative impact of the houses already approved (but not yet built) taken together with the proposed housing allocations is severe.

In order to mitigate the impact of the additional traffic from the 822 proposed houses, the district council leadership make vague references to A264/A22 corridor improvements and an unspecified bus priority along the A22. They say that

"The local highway network will be re-examined in more detail through any subsequent planning applications on the sites proposed for East Grinstead"

"Joint working between Surrey CC and West Sussex CC along with Mid Sussex and Tandridge District Council's is ongoing to determine how best to improve capacity along the A22/A264 corridor"

In other words, there are no firm proposals to resolve the current levels of congestion let alone the gridlock that is likely to result from the extra 2,065 houses already approved and yet we are expected

to accept on trust that the unspecified roads improvements will be so successful that they will be able to accommodate the traffic from the extra 822 houses now proposed.

The jointly commissioned WSP transport study to look into capacity issues for the A264/22 Felbridge junction has been running for nearly two years and has not identified a single option that promises to bring the junction back within capacity for the longer term.

Given the fact that a limit has been reached on approaching roads, and no viable alternative has been set out, I would recommend that the proposal is re-worked to take into consideration the traffic impact and viable alternatives proposed. Without this it can't realistically proceed.

Contrary to Neighbourhood Plan

The town council spent considerable time and resources on its Neighbourhood Plan, it was approved by the district council leadership, found to be sound at the public examination and overwhelmingly supported by referendum.

A meeting on 3rd May 2018 attended by both the town and district councils reviewed the Neighbourhood Plan policies against the newly adopted District Plan. The town council's planning committee minutes dated 18th May confirms that apart from policy EG5 – Housing, "the other policies in the plan are not deemed to be in non-compliance"

People expect the town council to strongly defend its Neighbourhood Plan and not simply accept the district council leadership view that it's policies are 'trumped' by their own.

Policy EG2 was designed to resist development outside the built-up boundary and *"to ensure that development does not result in the gradual accretion of development at the urban fringe"*. This fully supports the district council's own policy DP12 which says ...

"The primary objective of the District Plan with respect to the countryside is to secure its protection by minimising the amount of land taken for development and preventing development that does not need to be there."

The proposed site allocations at Felbridge and Imberhorne Farm are outside the East Grinstead built-up boundary and are therefore against both neighbourhood and district plan policies. It is not clear why does the district council leadership believe the houses to meet the housing shortfall in Crawley need to be in the countryside just outside East Grinstead's urban boundary

The supporting text to policy EG2 (at paragraph 4.9) explicitly calls out for development to be refused in the areas of countryside at Imberhorne Farm and south of the Crawley Down Road.

The district council leadership do not accept the validity of the neighbourhood plan supporting text and brush-off the town council's assertion that it must be taken into account when considering potential site locations. They say that the *"Inclusion of supporting text may lead to potential for conflicting guidance."* This is clearly disingenuous as the district council leadership approved the content of the neighbourhood plan before it went to examination

Policy EG11 was designed to ensure that East Grinstead didn't have to take mass housing allocations like these without the necessary improvements to the local highways network ...

Proposals, which cause a severe cumulative impact in terms of road safety and increased congestion, which cannot be ameliorated through appropriate mitigation will be refused

Policy EG11 fully supports the district council's own policy DP21 which requires that ...

"development is accompanied by the necessary infrastructure in the right place at the right time that supports development and sustainable communities. This includes the provision of efficient and sustainable transport networks"

Currently there are no detailed proposals to solve the existing traffic problems in East Grinstead. Unless and until such proposals are put forward which are shown to be both effective in resolving the junction capacity issues and deliverable, then the proposed site allocations at Felbridge and Imberhorne Farm are against both neighbourhood and district plan policies.

I will be making available a copy of this letter to Mims Davies my MP and would be grateful for a response to the issues I have raised.

Yours faithfully

Mike and Val Mitchell

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1809

Site Allocations DPD: Regulation 19 Consultation Response

Policy: SA18

ID: 1809

Response Ref: Reg19/1809/1

Respondent: Mrs V Mitchell

Organisation:

On Behalf Of:

Category: Resident

Appear at Examination? x

[REDACTED]

From: enquiries
Sent: 25 September 2020 09:13
To: planninginfo
Subject: FW: Mid-Sussex Consultation for new Homes- East Grinstead and surrounding area

One for planning...

From: Mike Mitchell [REDACTED]
Sent: 24 September 2020 19:31
To: enquiries <enquiries@midsussex.gov.uk>
Subject: Mid-Sussex Consultation for new Homes- East Grinstead and surrounding area

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

Date: 24 September 2020

Dear Sir/Madam

Mid-Sussex Consultation for new Homes – East Grinstead and Surrounding Area

I am writing to lodge my views in respect of the Mid Sussex consultation for the allocation of new homes at the following sites

550 homes at Imberhorne Farm

200 homes at Felbridge

50 homes at Crawley Down

22 homes at East Grinstead Police Station.

I have broken down my objections by category, as follows;

Failure to Consult

The National Planning Policy Framework [NPPF] requires councils to carry out public consultation on plans that is transparent and front-loaded (ie. at the earliest opportunity)

Paragraph 16 says that “Plans should be shaped by early, proportionate and effective engagement between plan makers and communities, local organisations, businesses, infrastructure providers and operators and statutory consultees”

Mid Sussex’s own Statement of Community Involvement says that ...

“... the community should be involved as early as possible in the decision making process when there is more potential to make a difference” and that

“... community involvement should be accessible to all those who wish to take part”

“It is important to seek input from the wider public, as the Plan will allocate sites for development in the district and include planning policies that will have an impact upon the existing and future communities”

The district council leadership team at Haywards Heath claim to have met their obligation to consult with residents by ...

- Issuing a press release
- Email alerts (to the few people with prior knowledge of the consultation and registered their email address)
- Comments on the Council’s social media channels
- Posts on the Council’s website
- Exhibition boards in the public library (library staff knew nothing about it)

Evidence suggests that these communication channels have been ineffective and in no way extensive as is required by Mid Sussex own policies.

When asked about the press release to notify residents of the consultations, officers at Mid-Sussex say that they issued the press release to ...

2 TV outlets, 6 radio stations, 4 newspapers, 3 news agencies, 6 magazines (but not their own in-house magazine) and 3 websites

When challenged to confirm which outlets actually broadcast or published the press release, the council’s communication team say only that they *“were aware that the Mid Sussex Times ran a story on 30th July regarding the consultation.”* A paper only servicing the towns of Burgess Hill and Haywards Heath

On the district council website, neither the main landing page nor main ‘Planning and Building’ page make reference to the consultation. The Council’s dedicated ‘Consultations’ page advertises only a Public Spaces Protection Order – Dog Control Consultation’

The district council leadership decided not to advertise either of the site allocation consultations in their own Mid Sussex Matters magazine, which is distributed at taxpayer expense by the council’s communication team 3 times a year to 73,000 homes in Burgess Hill, East Grinstead, Haywards Heath and Mid Sussex villages.

They say that *“Wherever possible, details of forthcoming consultations are included within the magazine, this is our preference as it reaches every household in the district. However publication dates and consultation dates do not always coincide.”*

The Spring 2020 edition failed to mention the site allocations consultation but did manage to alert readers to the review of the local plan not due to start until 2021.

The Summer edition was published on the 6th July but failed to mention the site allocations consultation but in the same month readers in Haywards Heath and Burgess Hill were alerted to it in their Mid Sussex Times.

The evidence clearly shows that there was no intention on the part of the district council leadership team in Haywards Heath to alert residents of East Grinstead to the site allocations consultation.

On the above basis I would submit there has been a failure to consult, in line with Mid-Sussex own policy requirement. Given this, it is difficult to envisage how this can be classified as a final consultation (when the first hasn’t happened) and the second is inadequate. I request that the process is begun again.

Unsound Assessment of Sites Alternative sites unreasonably discarded

Deliverable sites nearer to Crawley have been dismissed without proper regard for their overall sustainability and without being assessed against any of the planning considerations that the sites proposed for East Grinstead were.

National planning policy insists that development plans are prepared on the basis that all reasonable alternatives have been explored. The National Planning Policy Framework (NPPF) says at paragraph 35 that plans will only be found sound if they are ... *“Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence”*

For example, the site put forward at Crabbett Park could provide up to 2,500 homes close to the Crawley Fastway public transport system; allowing future residents ready access to Crawley's extensive services, infrastructure and employment opportunities. It would also provide for future expansion for housing needs in the future.

The district council leadership say that all sites must conform to the 'contiguous with an existing settlement' rule set out in district plan policy DP6. This policy is insufficiently flexible and was not designed to take account of housing shortfalls in neighbouring authorities.

NPPF paragraph 81 says that *"planning policies should be flexible enough to accommodate needs not anticipated in the plan"*

District council planning officers confirm that the site at Crabbett Park was rejected due its lack of 'Connectivity with existing settlements'. They say that ...

"The criteria established to assess the degree of separation is based on a distance of 150m from the built up area boundary (as defined on the Policies Maps). 150m represents a distance that the Council considers differentiates between being connected or remote from existing settlements."

This is factually incorrect - the site at Crabbett Park is less than 100m from the Crawley built-up boundary, meaning that the selection process was unsound and the site rejected on spurious grounds.

For sites not rejected 'out of hand', the district council leadership approved a selection methodology based on sites being assessed using 17 different planning criteria and rated on a 5 tier traffic light grading system. The combined grading was then used to determine whether the proposed site was a "high performing site" or not.

All sites assessed in East Grinstead were evaluated as 'high performing sites' and therefore allocated in the draft development plan. However, the overall performance assessment did not adequately account for the widely reported traffic constraints or the relevant neighbourhood plan policies

Site Selection Criteria ID 196 – Crawley Down Road Felbridge

Site Selection Criteria ID 770 - Imberhorne Farm

The site assessment section on highways, arguably the most relevant to the sites in East Grinstead, was left blank. When challenged, district council officers say that they can only assess the traffic situation by looking at all the proposed sites together and claim that when they do that, the traffic model shows that congestion is not bad enough to count.

The neighbourhood plan policies were simply referenced without any comment on how they were assessed. Policies EG2 and EG11 weigh heavily against the proposed site allocations at Felbridge and Imberhorne Farm.

However, no evidence is presented to show that policies EG2 or EG11 were genuinely considered or that they played any role in the overall assessment of sites, despite district council officers highlighting their importance.

Therefore I would contend that Mid Sussex have breached their own policy and procedures and should begin the process again of evaluation to ensure these are met.

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Mid Sussex and Tandridge jointly commissioned WSP to undertake a traffic study into the Felbridge A264/22 junction capacity. In October 2019 it confirmed what residents already know - the junction is already severely congested ...

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The Mid Sussex strategic transport study by SYSTRA reports that most major junctions in East Grinstead and surrounding area will be over-capacity once all the approved homes have been built, but suggest that this isn't a reason to resist the extra 820 houses now being proposed.

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"Once the model reaches capacity at a location, delay will increase significantly, and extensive rerouting will occur if alternative faster routes are available"

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Neither do they accept that the 822 proposed houses together with 1,230 houses already approved in East Grinstead plus the 835 houses already approved in the surrounding villages constitutes a severe impact on local roads despite their own SYSTRA model saying that committed housing will result in the following junctions being over capacity;

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The district council leadership say that they can only assess the highways impact for the each proposed site allocation by looking at them all together (ie. the ones in East Grinstead, Burgess Hill, Haywards Heath and other towns and villages in the district) in accordance with the national planning policy.

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The SYSTRA transport model clearly demonstrates that the cumulative impact of the houses already approved (but not yet built) taken together with the proposed housing allocations is severe.

In order to mitigate the impact of the additional traffic from the 822 proposed houses, the district council leadership make vague references to A264/A22 corridor improvements and an unspecified bus priority along the A22. They say that

"The local highway network will be re-examined in more detail through any subsequent planning applications on the sites proposed for East Grinstead"

"Joint working between Surrey CC and West Sussex CC along with Mid Sussex and Tandridge District Council's is ongoing to determine how best to improve capacity along the A22/A264 corridor"

In other words, there are no firm proposals to resolve the current levels of congestion let alone the gridlock that is likely to result from the extra 2,065 houses already approved and yet we are expected

to accept on trust that the unspecified roads improvements will be so successful that they will be able to accommodate the traffic from the extra 822 houses now proposed.

The jointly commissioned WSP transport study to look into capacity issues for the A264/22 Felbridge junction has been running for nearly two years and has not identified a single option that promises to bring the junction back within capacity for the longer term.

Given the fact that a limit has been reached on approaching roads, and no viable alternative has been set out, I would recommend that the proposal is re-worked to take into consideration the traffic impact and viable alternatives proposed. Without this it can't realistically proceed.

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The proposed site allocations at Felbridge and Imberhorne Farm are outside the East Grinstead built-up boundary and are therefore against both neighbourhood and district plan policies. It is not clear why does the district council leadership believe the houses to meet the housing shortfall in Crawley need to be in the countryside just outside East Grinstead's urban boundary

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The district council leadership do not accept the validity of the neighbourhood plan supporting text and brush-off the town council's assertion that it must be taken into account when considering potential site locations. They say that the *"Inclusion of supporting text may lead to potential for conflicting guidance."* This is clearly disingenuous as the district council leadership approved the content of the neighbourhood plan before it went to examination

Policy EG11 was designed to ensure that East Grinstead didn't have to take mass housing allocations like these without the necessary improvements to the local highways network ...

Proposals, which cause a severe cumulative impact in terms of road safety and increased congestion, which cannot be ameliorated through appropriate mitigation will be refused

Policy EG11 fully supports the district council's own policy DP21 which requires that ...

"development is accompanied by the necessary infrastructure in the right place at the right time that supports development and sustainable communities. This includes the provision of efficient and sustainable transport networks"

Currently there are no detailed proposals to solve the existing traffic problems in East Grinstead. Unless and until such proposals are put forward which are shown to be both effective in resolving the junction capacity issues and deliverable, then the proposed site allocations at Felbridge and Imberhorne Farm are against both neighbourhood and district plan policies.

I will be making available a copy of this letter to Mims Davies my MP and would be grateful for a response to the issues I have raised.

Yours faithfully

Mike and Val Mitchell

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1811

Site Allocations DPD: Regulation 19 Consultation Response

Policy: SA18

ID: 1811

Response Ref: Reg19/1811/2

Respondent: Mr J Capp

Organisation:

On Behalf Of:

Category: Resident

Appear at Examination? x

RESPONSE TO SUBMISSION SITES ALLOCATIONS DPD REGULATION 19

This document has five parts:

- Part A – Personal Details
- Part B – Representation
- Part C – Expanded Arguments to Support Representation
- Part D – Additional Concerns I Have As An East Grinstead Resident.
- Part E – Actions I am seeking

PART A – PERSONAL DETAILS

Name	John Frederick Capp
Address	<div>██████████</div> <div>██████████</div> <div>██████████</div> <div>██████████</div>
Email	██████████

PART B – REPRESENTATION

My comments relate to the lack of legal compliance and the unsoundness of the:

Site Allocations DPD	<input checked="" type="checkbox"/>
Sustainability Appraisal	<input checked="" type="checkbox"/>

I consider the site Allocations DPD to be unsound in the following respects:

Positively Prepared?	<input type="checkbox"/> No	Failure to positively engage with landowners/developers offering large strategic sites such as Crabbet Park
Justified?	<input type="checkbox"/> No	Failure to properly take account of reasonable alternatives, and failure to show sites SA19 & SA20 to be sustainable or deliverable Failure to demonstrate strategic highway matters to be

Effective?	<input type="checkbox"/> No	deliverable to resolve severe traffic constraints in East Grinstead
Consistent with National Policy?	<input type="checkbox"/> No	Sites SA19 & SA20 are not sustainable in accordance with policies in the framework

Please note that due to the lack of effective publicity by MSDC, I was totally unaware of the Regulation 18 consultation so was unable to comment on the Site Allocations DPD Draft Plan, despite wanting to do so. I have only become aware of this consultation from the Infrastructure First group's activities.

I support the arguments made by the Infrastructure First Group and would like them to represent me at the Examination with respect to sites SA19 and 20.

Yes ☒ No ☐

PLEASE NOTE: The concerns and actions with respect to SA18 are my additional contributions to this response and should be treated as such.

I am OBJECTING to the Site Allocations DPD and Sustainability Appraisal, and in particular to following proposed allocations being included in the Site Allocations DPD ...

SA18 – Former East Grinstead Police Station
 SA19 – Land South of Crawley Down Road
 SA20 – Land South and West of Imberhorne Upper School

I consider them to be unsustainable and in conflict with National Planning Policy and the Local Development Plan [Mid Sussex District Plan & East Grinstead Neighbourhood Plan] for the following reasons:

1) The Council has failed to consult properly with the wider public

2) The Council has failed to adequately assess all potential sites

Allocation of sites SA19 & SA20 would ...

3) Lead to reduced opportunities for people to live and work within their communities

4) Lead to unsustainable traffic congestion with local junctions already over capacity

5) Be contrary to national planning policies & the Local Development Plan

Allocation of site SA19 would ...

6) Represent an unacceptable extension to Felbridge village and result in coalescence with East Grinstead

Allocation of site SA20 would ...

- 7) Result in loss of valued agricultural land and habitat, harm the setting of heritage assets and result in coalescence with the village of Felbridge

1. The Council has failed to consult properly with the wider public

Unsound because ...

☒ MSDC has failed to deliver on its Statement of Community Involvement strategy

- ❖ The National Planning Policy Framework [NPPF] requires councils to carry out public consultation on plans that is transparent and front-loaded (ie. at the earliest opportunity). Paragraph 16 says that *“Plans should be shaped by early, proportionate and effective engagement between plan makers and communities, local organisations, businesses, infrastructure providers and operators and statutory consultees...”*
- ❖ MSDC's Statement of Community Involvement requires that *“the community should be involved as early as possible in the decision making process when there is more potential to make a difference”* and that *“community involvement should be accessible to all those who wish to take part”*.
- ❖ MSDC claim to have met their obligation to consult with residents by; Issuing a single press release; Email alerts (to the few people with prior knowledge of the consultation and so had registered their email address); ad-hoc comments on the Council's social media channels; posts on the Council's website; and exhibition boards in the public library (for a few days during the Regulation 18 consultation period and nothing at all for the Regulation 19 consultation).
- ❖ The evidence shows that these communication channels have been wholly inadequate in reaching residents and hard-to-reach groups.
- ❖ **Ineffective Press Release Campaign** ... MSDC state that the press release was distributed to the following:
 - **TV outlets** – ITV Meridian News & BBC South East Today
 - **Radio Stations** – BBC Radio Sussex; BBC Radio Surrey; Burgess Hill Community Radio; Heart Radio; Meridian FM & More Radio
 - **Newspapers** – East Grinstead Courier; Mid Sussex Times; The Argus & West Sussex County Times
 - **New Agencies** – Dehaviland; Dods Monitoring & Press Association
 - **Magazines** – Cuckfield Life; East Grinstead Living; Hurst Life; Lindfield Life; RH Uncovered & Sussex Living
 - **Websites** – BBC News Online; Burgess Hill Uncovered & Crawley News 24
- ❖ However MSDC have failed to monitor whether the press release was used by these media outlets.
 - Officers can only say that they *“were aware that the Mid Sussex Times ran a story on 30th July regarding the consultation.”* Just one entry in a weekly paper servicing the towns of Burgess Hill and Haywards Heath but that is not distributed in East Grinstead or Felbridge. No publicity in the local East Grinstead paper despite the DPD proposing over half of the homes to be allocated in East Grinstead and Felbridge.

❖ **No alerts on the Council's website ...**

- Neither the main landing page nor the main 'Planning and Building' page make ANY reference to the consultation.
- The Council's dedicated 'Consultations' page advertises only a 'Public Spaces Protection Order – Dog Control Consultation', and says NOTHING about the Site Allocations consultation.

❖ **No alerts in Mid Sussex Matters ...**

- MSDC's own magazine is distributed at taxpayers' expense 3 times a year to 73,000 households in Burgess Hill, East Grinstead, Haywards Heath and Mid Sussex villages.
- MSDC say that *"Wherever possible, details of forthcoming consultations are included within the magazine, this is our preference as it reaches every household in the district. However publication dates and consultation dates do not always coincide."*
- The Spring 2020 edition failed to mention the Site Allocations consultation but did alert readers to the review of the local plan not due to start until 2021.

2. The Council has failed to adequately assess all potential sites

Unsound because ...

- ☒ Alternative sustainable sites that would better meet Crawley's unmet need were summarily discarded without due consideration
- ☒ So-called 'High Performing Sites' were not adequately assessed against acknowledged Highway constraints or EGNP policies

- ❖ The purpose of the Site Allocations DPD is to meet the Inspector's requirement for MSDC to allocate sites to help accommodate Crawley's unmet need, which they had failed to take account of in their submitted District Plan.
- ❖ Deliverable sites nearer to Crawley have been dismissed without proper regard to their overall sustainability and without being assessed against any of the 17 planning considerations imposed on the sites allocated in the DPD.
- ❖ National planning policy (NPPF) says that development plans should be prepared on the basis that all reasonable alternatives are explored. Two significant deliverable and sustainable options were dismissed without due consideration.
- ❖ The site put forward at Crabbett Park (SHEELA Reference 18) could provide up to 2,300 homes close to the Crawley and could be linked into the Fastway public transport system. This would allow future residents ready access to Crawley's extensive services, infrastructure and employment opportunities using sustainable transport.

- ❖ Developers Mayfield have put forward a proposal for a new, sustainable, mixed-use, garden village south of Crawley (Mayfields Market Town) in which the developer has undertaken to provide a comprehensive range infrastructure services before the site is occupied. Whilst Horsham DC have engaged positively with Mayfield, MSDC have failed to do so.
- ❖ MSDC say that all sites in the DPD must be 'contiguous with an existing settlement' as set out in policy DP6. This policy was not designed to take account of housing shortfalls in neighbouring authorities and is insufficiently flexible. NPPF paragraph 81 says that *"planning policies should be flexible enough to accommodate needs not anticipated in the plan"*.
- ❖ MSDC officers confirm that the site at Crabbett Park was rejected solely due to its lack of 'Connectivity with existing settlements'. They say that ... *"The criteria established to assess the degree of separation is based on a distance of 150m from the built up area boundary (as defined on the Policies Maps)"*.
- ❖ This is an error in fact - the site at Crabbett Park is less than 100m from the built-up boundary of Crawley, meaning that the selection process was unsound and the site rejected on spurious grounds.
- ❖ The sites in East Grinstead & Felbridge were evaluated as 'high performing sites' without any evidence being presented to show that the assessment took account of the widely reported traffic constraints or relevant neighbourhood plan policies.
 - The site assessment section on 'highways', arguably the most relevant to the sites along the A264/A22 corridor, was left blank.
 - No evidence is offered to show that policies EG2, EG2a or EG11 were genuinely considered or that they played any role in the overall assessment of sites.

3. Allocation of sites SA18, SA19 & SA20 would lead to reduced opportunities for people to live and work within their communities

Unsound because ...

- ☒ Unsustainable separation of homes and employment space

- ❖ There is no housing shortfall in East Grinstead or Felbridge where the housing need is fully satisfied by the 782 homes already completed since the start of the plan period together with the 1,238 homes already committed ...
 - 714 with permission as at April 2014
 - 270 allocated in the Neighbourhood Plan
 - 254 permitted since April 2020

[Source: MSDC Housing Land Supply 'Completions and Commitments' 2020]
- ❖ The proposed sites are required to meet a housing shortfall in Crawley for about 1,500 new homes. Nearly half of these are proposed for two sites in East Grinstead and Felbridge. Alternative and more sustainable development sites on the edge of Crawley have been dismissed without proper consideration.

- ❖ The proposed site allocations at East Grinstead and Felbridge run counter to District Plan strategic objectives to support sustainable economic growth. A stated aim of Policy DP1 is *“to provide opportunities for people to live and work in their communities, reducing the need for commuting”*.
- ❖ The DPD proposes 9 new employment sites elsewhere in the district but none in East Grinstead or Felbridge.
- ❖ Felbridge is a medium sized village with very limited employment opportunities and East Grinstead has suffered a very significant loss of employment space since the beginning of the plan period.
- ❖ A key finding of the Mid Sussex Economic Profile Study (2018), says that *“There has been a significant loss of floor space to residential conversions particularly in East Grinstead.”* This study reports 19,440m² of commercial office space in East Grinstead.
- ❖ Since then East Grinstead’s stock of office space has continued to decline, with 12,000m² (62%) being lost as a result of a single planning permission for the conversion of East Grinstead House in June 2020.
 - The East Grinstead Business Association objected to the conversion, saying that we have lost *“7 existing, long standing, large and well known successful local businesses that have live leases and in combination employ around 1,000 people”*
 - The conversion will yield another 253 homes, with potentially double the number of new residents needing to commute out of East Grinstead for work
 - Large sites do not contribute towards the MSDC windfall targets but unplanned homes on this scale should count towards the number of homes the Site Allocations DPD is required to provide
- ❖ MSDC confirm that they do not monitor the amount of office floorspace lost through residential conversions, so have no evidence to show that the 772 homes proposed for East Grinstead and Felbridge are sustainable. Potentially, there could be 1,500 new residents and no new employment space.
- ❖ Increasing traffic congestion and loss of employment space act as significant constraints on economic growth and investment. Another stated aim of Policy DP1 is *“to promote a place which is attractive to a full range of businesses, and where local enterprise thrives”*.

4. Allocation of sites SA18, SA19 & SA20 would lead to unsustainable traffic congestion with local junctions already over capacity

Unsound because ...

- ☒ Material up-to-date traffic evidence is being withheld from the consultation process
- ☒ The MSDC strategic transport assessment understates baseline traffic conditions
- ☒ Despite this, the model highlights a severe cumulative impact in-combination with allocations in the adopted plan
- ☒ There are no demonstrable highway mitigation proposals

- ❖ Multiple traffic studies confirm that the local highways network is a significant constraint to development in East Grinstead and threatens its future economic sustainability. The East Grinstead Neighbourhood Plan states that *“The constrained nature of East Grinstead’s current infrastructure is by far the greatest challenge facing the town in the immediate future, with existing roads and junctions already over capacity.”*

- ❖ MSDC has published a revised transport study by SYSTRA as evidence to support the Site Allocations DPD. They have also jointly commissioned WSP to carry out a study into Felbridge A264/22 junction capacity and to look in detail at options to alleviate congestion.

WSP Study

- ❖ An Executive Summary Report dated October 2019 was published by Tandridge District Council but this report has NOT been disclosed by MSDC. It is understood that MSDC is refusing permission to release the full report for consultation.
- ❖ The WSP Executive Summary concludes that the A264/A22 junction in Felbridge is currently operating over capacity ...
 - *"The Felbridge junction has been identified as a constraint to development coming forward in Tandridge and the Felbridge/East Grinstead area. The junction currently operates above capacity leading to congestion during peak periods and at other times of the day."*
 - The congestion figures for the A264 approach arm were measured in 2018 ...

	AM Peak	PM Peak
Junction Capacity *	106.60%	101.40%
Vehicle Queue Length	48	33
Queuing Delay	3 mins 2 secs	1 min 55 secs

* 100% is deemed to be a junction's theoretical capacity

- ❖ The WSP Executive Summary confirms that their recommended option requires the compulsory purchase of 3rd party land and while it offers a temporary improvement over the 'do nothing' option, it was unable to prevent the junction becoming over capacity once again by the end of the plan period.

SYSTRA Report

- ❖ The MSDC strategic transport study predicts that most major junctions in East Grinstead and surrounding area will be over-capacity by the end of the plan period BEFORE considering the additional impact of the proposed allocations.
- ❖ The SYSTRA model predicts that the 772 houses being proposed for East Grinstead and Felbridge will significantly increase the current levels of 'rat running' along residential streets and country lanes.
- ❖ The SYSTRA model attributes the severe capacity issues to houses already allocated by the 2018 District Plan and argues that the impact of the proposed DPD allocations taken separately is not sufficient to trigger the National Policy 'residual cumulative impact' test ...
 - NPPF paragraph 109 states that *"Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe."*
 - The impact of traffic from sites proposed in the Site Allocations DPD is not separate from the traffic impact from sites allocated in the Local Development Plan. The Sites Allocation DPD is allocating sites within the District Plan as instructed by the inspector, in order to rectify MSDC's earlier failure to take account of Crawley's unmet need in its submitted draft District Plan.
 - MSDC argue that traffic generated by the Local Development Plan is an 'existing situation' and can be ignored when applying the 'residual cumulative' test. This is untenable.

- ❖ The SYSTRA model relies on adjusted traffic data from 2008. This significantly understates the existing levels of congestion at the A264/A22 junction in Felbridge when compared with the WSP model using data collected in 2018.

	SYSTRA Model			WSP Model	
	AM Peak	PM Peak		AM Peak	PM Peak
Junction Capacity	61%	65%		106.60%	101.40%
Vehicle Queue	2	3		48	33
Queuing Delay	15 secs	21 secs		3 mins 2 secs	1 min 55 secs

- ❖ MSDC have chosen not to publish the findings of the more recent WSP traffic study and are therefore considered to be withholding material evidence from the consultation process, preventing residents being informed of the expected consequences of development.

No Deliverable Mitigation

- ❖ To mitigate the impact of the proposed allocations in East Grinstead, MSDC makes vague references to an 'A264/A22 corridor improvement project' and a project to deliver unspecified 'Bus priority along the A22'. There are no deliverable or specific proposals in the Infrastructure Delivery Plan and no secure funding.
- ❖ WSP were jointly commissioned to investigate improvement options on the A264/A22 in 2018 but MSDC have chosen not published the findings. The WSP Executive Summary calls into question the deliverability of the sites at East Grinstead and Felbridge.
- ❖ There are no proposals for highway interventions in the Site Allocation DPD or Sustainability Appraisal to mitigate the impact of the proposed sites in East Grinstead and Felbridge, either alone or in combination with sites already committed in the Local Development Plan.
- ❖ This Site Allocation DPD is therefore contrary to national policy ... NPPF paragraph 108 states that "*In assessing sites that may be allocated for development in plans, or specific applications for development, it should be ensured that: any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree.*"

5. Allocation of sites SA19 & SA20 would be contrary to the NPPF and the Local Development Plan

Unsound because ...

- ☒ Sites SA19 and SA20 are in conflict with Neighbourhood and District Plan policies
- ☒ Proposed site allocations at Felbridge and Imberhorne Farm are outside the East Grinstead/Felbridge built-up boundaries and are therefore against policies EG2, EG2a, DP12 and DP13
- ☒ In the absence of demonstrable proposals to resolve the local junction capacity issues, the site allocations in East Grinstead and Felbridge are in conflict with policies EG11 and DP21

- ❖ At a review of Neighbourhood Plan policies on 3rd May 2018 following the adoption of the District Plan, MSDC confirmed that apart from policy EG5, the Neighbourhood Plan was in conformity.
- ❖ Policies EG2 and EG2a are designed to resist development outside the built-up boundary and "to ensure that development does not result in the gradual accretion of development at the urban fringe". These policies conform to MSDC's own policies DP12 and DP13, which say ... "*The primary objective of the District Plan with respect to the countryside is to secure its protection by minimising the amount of land taken for development and preventing development that does not need to be there.*"

- ❖ It is not clear why MSDC believe the houses to meet the housing shortfall in Crawley are best located in the countryside in the gap between the Felbridge and East Grinstead, outside their urban boundaries when sustainable sites adjacent to Crawley have not been properly evaluated.
- ❖ The proposed site allocations SA19 and SA20 are outside the East Grinstead & Felbridge built-up boundaries and are therefore against both Neighbourhood and District Plan policies [EG2, EG2a, DP12 & DP13].
- ❖ The supporting text to policy EG2 (at paragraph 4.9) explicitly calls for development to be refused in the areas of countryside at Imberhome Farm and south of the Crawley Down Road ... precisely the location of the proposed sites SA19 and SA20.
- ❖ Policy EG11 was designed to ensure that East Grinstead didn't have to accept housing allocations like these without compensating improvements to the local highways network being delivered ... *"Proposals, which cause a severe cumulative impact in terms of road safety and increased congestion, which cannot be ameliorated through appropriate mitigation will be refused"*.
- ❖ Policy EG11 fully supports policy DP21 which requires that ... *"development is accompanied by the necessary infrastructure in the right place at the right time that supports development and sustainable communities. This includes the provision of efficient and sustainable transport networks"*.

6. Allocation of SA19 would represent an unacceptable extension to Felbridge village and result in coalescence with East Grinstead

Unsound because ...

- ☒ SA19 is contrary to the spatial housing objectives of policy DP6
- ☒ SA19 is contrary to Neighbourhood Plan policies EG2 and EG2a and corresponding District Plan policies DP12 and DP13

- ❖ Felbridge is a rural village in Surrey with a small strip of land south of the Crawley Down Road falling within the administrative boundary Mid-Sussex.
- ❖ TDC acknowledge in its Settlement Hierarchy Addendum 2018 that *"although the proximity of East Grinstead plays a role in Felbridge's sustainability, the settlement itself can only demonstrate a basic level of provision and as such is categorised as a Tier 3 (rural settlement)"*
- ❖ However, MSDC is treating the land south of the Crawley Down Road as an extension to East Grinstead without due regard for its village status or the gap between the two distinct communities.
- ❖ With no more frontage sites available along the Crawley Down Road, MSDC are allowing the extension of the village towards East Grinstead, with 120 homes recently approved as back land developments. With a current population of 532 homes, the existing commitments will increase the number of homes by nearly 25%. The village has no doctor's surgery, pharmacy, dentist, opticians and only a small convenience store. Infrastructure contributions and subsequent council taxes will go to centrally to MSDC in Haywards Heath with no plans to improve meagre services in the village.
- ❖ The proposal to allocate SA19 as an additional back land site for 200 homes south of the Crawley Down Road would result in an increase in the number of homes by a further 30%; without any plans or funding to improve infrastructure that would mitigate the harm to the function and character of the village.

- This is contrary to policy DP6 (Settlement Hierarchy) which allocates a much smaller proportion of housing requirement to Tier 3 medium sized villages.
- The strategic aims of policy DP6 are ...*"To promote well located and designed development that reflects the District's distinctive towns and villages, retains their separate identity and character and prevents coalescence"*, and *"To create and maintain town and village centres that are vibrant, attractive and successful and that meet the needs of the community"*.
- ❖ The proposed site is located outside the built-up boundaries of both Felbridge and East Grinstead. This is contrary to policy DP12 (Protection and enhancement of countryside) which says that ...*"The primary objective of the District Plan with respect to the countryside is to secure its protection by minimising the amount of land taken for development and preventing development that does not need to be there"*.
- ❖ The site allocation is also contrary to the strategic aim of policy DP13 (Preventing Coalescence) ...*"To promote well located and designed development that reflects the District's distinctive towns and villages, retains their separate identity and character and prevents coalescence."*
- ❖ The East Grinstead Neighbourhood Plan expressly lists the land to the south of Crawley Down Road as contrary to policies EG2 and EG2A to ensure development "does not result in the merging or coalescence of settlements and the gradual accretion of development at the urban fringe".

7. Allocation of SA19 would result in loss of valued agricultural land and habitat, harm the setting of heritage assets and result in coalescence with the village of Felbridge

Unsound because ...

- ☒ SA19 landscape assessment not supported with evidence
- ☒ SA19 contrary to DP34 and NPPF paragraph 175

- ❖ Site allocations SA20 is surrounded by high yielding agricultural land that justifies an Agricultural Land Classification Grade of 3a (ie. the best and most versatile agricultural land).
 - District Plan DP12 says that *"Where identified, Grade 1, 2 and 3a agricultural land should be protected from development due to its economic importance and geological value. This is the land which is most flexible, productive and efficient and can best deliver future crops for food and non-food uses."*
 - The Sustainability Appraisal reports that the Council currently lacks data to distinguish Grade 3 from 3a agricultural land and assumes a default classification of 3 without evidence.
 - The planning assessment proforma rates the SA20 site location as having a 'positive impact' on the Landscape without any explanation or evidence to support the officers' opinion.
- ❖ Site allocation SA20 is adjacent to the Grade II Listed Gullede Farmhouse and Imberhorne Farm Cottages
 - The rural setting of these listed buildings is important to their value as heritage assets and development on the site would overwhelm the buildings and result in significant harm
 - District Plan policy DP34 says that *"Special regard is given to protecting the setting of a listed building"*

- ❖ The proposed site also lies adjacent to a substantial area of ancient woodland which is already 'hemmed in' on two sides by residential and industrial development. Further development would serve to isolate the woodland from the surrounding countryside resulting in unnecessary habitat fragmentation ...
 - Ancient woodland is classified by National Planning Policy as an 'unreplaceable habitat' and NPPF paragraph 175 says *"development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons"*
 - Natural England states that *"Ancient woodland and the wildlife it supports are particularly vulnerable to various impacts associated with nearby residential areas. These include recreational disturbance, fly tipping, light pollution, introduction of non-native plant species from garden waste, predation of wildlife by pet cats and pollution from dog faeces"*
 - These harmful impacts can only be mitigated to a limited degree by the imposition of a buffer zone.
- ❖ The farmlands at the proposed SA20 site location provide an important breeding habitat for 'red list' bird species such as the Skylark and Yellowhammer with loss of habitat being the main reason for the sharp population decline.
 - The developer's own Ecological Survey acknowledges that the Skylark *"requires more specialised ground nesting provisions"* and that the ability of the SANGS to compensate for the loss of farmland habitat is limited due to recreational disturbance.
 - NPPF paragraph 175 says that *"if significant harm to biodiversity resulting from a development cannot be avoided, adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused."*

PART D – ADDITIONAL CONCERNS I HAVE AS AN EAST GRINSTEAD RESIDENT

IN MARCH 2020 HOUSING SECRETARY ROBERT JENRICK UNVEILED INITIAL HOUSING PROPOSALS AHEAD OF A PROMISED WHITE PAPER, INCLUDING AN AMBITION FOR AN 'INFRASTRUCTURE FIRST' APPROACH TO PLANNING.

Cllr Philip Atkins, housing and planning spokesperson for the County Councils Network, said:

"The Housing Secretary's ambition to move to an 'infrastructure first approach' to planning chimes with what many communities in county areas would like to see. More homes are being built – but we need to move away from simply planning by numbers to instead making sure that new developments do have access to the right amenities – both for existing and new residents."

This present proposal gives no clear proof that this is happening, rather the opposite will happen if this proposal goes ahead with East Grinstead, Crawley Down and the Police Station having nothing included to provide the sort of environment present residents are lacking, nor future infrastructure required for the new developments.

Generic Concerns

- ❖ Most schools in these areas are oversubscribed; new developments only increase the pressure on this. It is widely acknowledged the town already needs additional schools. These should be put in place prior to any new development as per the housing minister's proposals.

- ❖ There is much talk about improving infrastructure, there is no mention what will be done, how or who will pay for this. The proposal just mentions 'contributions', which are not specific and tend to be proven unreliable.
- ❖ The greenfield space around East Grinstead is slowly but surely being eroded, to the detriment of its residents. When will it stop? It has become an overdeveloped town with too much traffic with an increasingly poor infrastructure.
- ❖ Local habitat could be destroyed.
- ❖ Increased pressure on parking in Town, at the station and residential roads around it. I live in a road near the station and suffer with commuter parking and the issues this brings, this can only get worse with increased commuters.
- ❖ GPs and QVH have limited facilities and extremely stretched.
- ❖ Trains only travel north and buses are far too few with insufficient frequency and stop running far too early. Result of new housing equals extra traffic and associated pollution.
- ❖ There is little employment in EG, majority of workers commute to places outside of town, very many by car. If they work in London they will need transport to the station, which is not walkable in a reasonable time. Roads around the station will get more commuter parking.
- ❖ On top of all the current and proposed developments many large office blocks are or are being converted into, apartments. There could well be a situation where supply outstrips demand leading to property values decreasing.
- ❖ Parents will not stop driving their children to school safely given their fears of walking or cycling or putting them on a bus alone.

My specific concerns with each site are below; they are based 'pre-Covid':

Proposed Imberhorne Development – SA20

- ❖ This land is an arable greenfield site, can the country afford to be losing this facility as we move out of the EU?
- ❖ The town is already in need of much improved infrastructure: Schools, both primary and secondary already oversubscribed; GPs, one currently closed to new patients and the other two have been in recent times, plus of course improved transport, including roads. It is common knowledge that there is a minimum four week wait to see a GP.

- ❖ The access roads to the site must use Imberhorne Lane which is often subject to long delays due to congestion. The additional cars from the proposed 550 dwellings will clearly make matters worse both along this road and surrounding areas, specifically the A22 corridor.
- ❖ Cycle routes need coordinated planning; the current 'temporary trial' cycle lane along the A22 has proved a failure having been declared dangerous, and removed.
- ❖ Lack of connectivity from the proposed site into town as it is too far to walk, minimum 30 minutes from Imberhorne Lane, much longer from Felbridge, so the car will be used. There is insufficient parking in town currently, leading to parking in residential roads nearby.
- ❖ Imberhorne school needs to be rebuilt not extended. The plan to incorporate the Imberhorne Lower school at Imberhorne Lane has been in place for a number of years, the site at Windmill lane is planned for redevelopment. How will the 'extended' school meet the demand from the lower school move and the new residents?
- ❖ Where will the funding for specialist facilities and associated staff come from for the SEN activities, currently this is part funded by the Government. The mention of this implies something more will be added to an ever decreasing SEN local and national budget.
- ❖ There is no guarantee the green corridors will remain as the whole development would be using land designated for greenfield/arable pasture. This development will not be sustaining the landscape, it will be destroying it.

Felbridge – SA19

Most of the above equally applies to this site with respect to infrastructure requirements. And residents will be using the same schools, same town and the same roads.

- ❖ The access roads to the site must use Crawley Down Road which is often subject to long delays due to congestion. The additional cars from the proposed 200 dwellings will clearly make matters worse both along this road and surrounding areas, specifically the A22 corridor
- ❖ Will the pasture land be put to better use for agriculture as we have left the EU?

- ❖ Children attending Imberhorne will not have access to the school bus given the site is less than 3 miles from the school, so parents will have to drive them in. The walking route takes in the A264, A22 and Imberhorne Lane which are heavily used and hence leading to increased traffic pollution.
- ❖ The potential Flood risk issue with Felbridge water.
- ❖ Only a Small play space to be provided.

Police Station- SA18

- ❖ Are these dwellings really needed by the town? A quick search on 'Rightmove' shows 198 flats for sale in East Grinstead, many being 'new homes'. The number of office blocks being converted into dwellings is significant and will only add to this number. Loss of office space in town has decreased business and employment opportunities.
- ❖ The proposed site lies inside the Eastcourt area of the Town and is a public amenity. As such it should not be sold for the benefit of a developer to provide 'high end' accommodation in park land. The site should be preserved for the use of the town for recreational and educational purposes.
- ❖ Access to the site is onto the A264 near the Blackwell Hollow/Mount Noddy roundabout. The East arterial road for East Grinstead. This is opposite the planned development at Blackwell Farm Road. Leaving the site will only be onto the roundabout leading to further congestion at a busy junction. If there are plans to use the other entrance to Eastcourt, this will increase traffic through the park putting the public using the facility at increased risk.

PART E – ACTIONS I AM SEEKING

I request that the following action is taken with respect to the draft Site Allocations DPD and associated documents:

1. The DPD should be withdrawn as it is not legally compliant - the consultation was not carried out in line with national policy or the MSDC Statement of Community Involvement.
2. The WSP transport report should be published in full and its findings submitted for consultation.
3. The proposed allocations at East Grinstead and Felbridge should be withdrawn as they cannot be delivered sustainably.
4. MSDC should withdraw the DPD and carry out a proper evaluation of sustainable sites close to Crawley including Crabbet Park and Mayfield.

5. In the event that the Inspector decides the DPD should progress to Examination then any allocations at East Grinstead or Felbridge should be made contingent on delivering the junction improvements identified in Atkins 3 and the WSP studies.
6. MSDC to carry out a survey to establish the current levels of 'traffic pollution' at the A22/A264 and the A22/Imberhorne Lane junctions. The results to be compared against acceptable safe levels and what the impact of an increase of 750 households in the immediate area would have on these levels.
7. MSDC to explain why East Grinstead/Felbridge is expected to provide housing caused by the shortfalls in Crawley when there are significant developments underway around the M23/A264 junction, along the M23 and along the A264 corridors.
8. MSDC to provide number of Pupil places available in East Grinstead currently against the expected demand from new residents.
9. 'New' local developments in recent years have not adequately planned for the parking requirements of the households. How will MSDC ensure the Developer will provide adequate parking on this development? Failure to do so will impact adjoining areas.
10. MSDC to how the additional SEN provision at Imberhorne School can be met against the current shrinking SEN fund provided by the Government and what will be the impact when spread across the increased number of students.
11. MSDC to explain how it will ensure the developer will deliver all the 'promised' infrastructure improvements, or like so many cases we hear of will they slowly but surely not become reality?
12. MSDC to state what they will do to improve the existing 'failing' town infrastructure, and how will success be measured in the following areas:
 - a) NHS providers, e.g. GP access and QVH.
 - b) Education.
 - c) Transport.
 - d) Police presence.
13. MSDC to guarantee no further development at all three sites on surrounding land IF these proposals proceed, will precedents be set. I sincerely hope these are not 'thin edges of wedges' eating into our agricultural, pastures and public spaces.
14. MSDC to explain why the school is being extended and not 're-built' or a new school built in order to meet growing pupil numbers and provide improved educational and recreational facilities that could be used by the wider community. Currently the school is not fit for purpose, particularly being located on two sites, Imberhorne Lane and Windmill Lane.
15. MSDC to detail the size of 'public Space' on the Imberhorne site to be provided as far too much open space is being 'developed'.

16. The Imberhorne school proposal states 'Gypsies and Travellers and Travelling Showpeople provision may be required'. East Grinstead is currently not listed as a potential site for these people. MSDC to declare if this has changed?
17. The Felbridge site has one access road onto the Crawley Down Road with most traffic leading onto the A264 and then A22. East Grinstead is well known for not having a 'fit for purpose' road system for many years with the counties involved never agreeing a way forward. There appears no scope to improve what is there, what does the developer intend to collaboratively do with the local councils?
18. MSDC to conduct a survey of traffic use at the A264/Mount Noddy roundabout and impact of proposed developments at the Police Station and Blackwell Farm Road
19. to establish increased use and pollution levels.
20. I do not wish to take part in the Examination but I support the arguments made by the Infrastructure First Group with respect to SA19 and SA20 and would like them to represent me at the Examination. My contributions with respect to S18 are my representation.

1813

Site Allocations DPD: Regulation 19 Consultation Response

Policy: SA18

ID: 1813

Response Ref: Reg19/1813/2

Respondent: Ms C Capp

Organisation:

On Behalf Of:

Category: Resident

Appear at Examination? x

RESPONSE TO SUBMISSION SITES ALLOCATIONS DPD REGULATION 19

This document has five parts:

- Part A – Personal Details
- Part B – Representation
- Part C – Expanded Arguments to Support Representation
- Part D – Additional Concerns I Have As An East Grinstead Resident.
- Part E – Actions I am seeking

PART A – PERSONAL DETAILS

Name Caitriona Veronica Capp

Address

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

Email

[REDACTED]

PART B – REPRESENTATION

My comments relate to the lack of legal compliance and the unsoundness of the:

Site Allocations DPD

✓

Sustainability Appraisal

✓

I consider the site Allocations DPD to be unsound in the following respects:

Positively Prepared?

No

Failure to positively engage with landowners/developers offering large strategic sites such as Crabbet Park

Justified?

No

Failure to properly take account of reasonable alternatives, and failure to show sites SA19 & SA20 to be sustainable or deliverable

Failure to demonstrate strategic highway matters to be

Effective?	<input type="checkbox"/> No	deliverable to resolve severe traffic constraints in East Grinstead
Consistent with National Policy?	<input type="checkbox"/> No	Sites SA19 & SA20 are not sustainable in accordance with policies in the framework

Please note that due to the lack of effective publicity by MSDC, I was totally unaware of the Regulation 18 consultation so was unable to comment on the Site Allocations DPD Draft Plan, despite wanting to do so. I have only become aware of this consultation from the Infrastructure First group's activities.

I support the arguments made by the Infrastructure First Group and would like them to represent me at the Examination with respect to sites SA19 and 20.

Yes ☒ No ☐

PLEASE NOTE: The concerns and actions with respect to SA18 are my additional contributions to this response and should be treated as such.

I am OBJECTING to the Site Allocations DPD and Sustainability Appraisal, and in particular to following proposed allocations being included in the Site Allocations DPD ...

SA18 – Former East Grinstead Police Station
 SA19 – Land South of Crawley Down Road
 SA20 – Land South and West of Imberhorne Upper School

I consider them to be unsustainable and in conflict with National Planning Policy and the Local Development Plan [Mid Sussex District Plan & East Grinstead Neighbourhood Plan] for the following reasons:

1) The Council has failed to consult properly with the wider public

2) The Council has failed to adequately assess all potential sites

Allocation of sites SA19 & SA20 would ...

3) Lead to reduced opportunities for people to live and work within their communities

4) Lead to unsustainable traffic congestion with local junctions already over capacity

5) Be contrary to national planning policies & the Local Development Plan

Allocation of site SA19 would ...

6) Represent an unacceptable extension to Felbridge village and result in coalescence with East Grinstead

Allocation of site SA20 would ...

- 7) Result in loss of valued agricultural land and habitat, harm the setting of heritage assets and result in coalescence with the village of Felbridge

1. The Council has failed to consult properly with the wider public

Unsound because ...

☒ MSDC has failed to deliver on its Statement of Community Involvement strategy

- ❖ The National Planning Policy Framework [NPPF] requires councils to carry out public consultation on plans that is transparent and front-loaded (ie. at the earliest opportunity). Paragraph 16 says that *“Plans should be shaped by early, proportionate and effective engagement between plan makers and communities, local organisations, businesses, infrastructure providers and operators and statutory consultees...”*
- ❖ MSDC's Statement of Community Involvement requires that *“the community should be involved as early as possible in the decision making process when there is more potential to make a difference”* and that *“community involvement should be accessible to all those who wish to take part”*.
- ❖ MSDC claim to have met their obligation to consult with residents by; Issuing a single press release; Email alerts (to the few people with prior knowledge of the consultation and so had registered their email address); ad-hoc comments on the Council's social media channels; posts on the Council's website; and exhibition boards in the public library (for a few days during the Regulation 18 consultation period and nothing at all for the Regulation 19 consultation).
- ❖ The evidence shows that these communication channels have been wholly inadequate in reaching residents and hard-to-reach groups.
- ❖ **Ineffective Press Release Campaign** ... MSDC state that the press release was distributed to the following:
 - **TV outlets** – ITV Meridian News & BBC South East Today
 - **Radio Stations** – BBC Radio Sussex; BBC Radio Surrey; Burgess Hill Community Radio; Heart Radio; Meridian FM & More Radio
 - **Newspapers** – East Grinstead Courier; Mid Sussex Times; The Argus & West Sussex County Times
 - **New Agencies** – Dehaviland; Dods Monitoring & Press Association
 - **Magazines** – Cuckfield Life; East Grinstead Living; Hurst Life; Lindfield Life; RH Uncovered & Sussex Living
 - **Websites** – BBC News Online; Burgess Hill Uncovered & Crawley News 24
- ❖ However MSDC have failed to monitor whether the press release was used by these media outlets.
 - Officers can only say that they *“were aware that the Mid Sussex Times ran a story on 30th July regarding the consultation.”* Just one entry in a weekly paper servicing the towns of Burgess Hill and Haywards Heath but that is not distributed in East Grinstead or Felbridge. No publicity in the local East Grinstead paper despite the DPD proposing over half of the homes to be allocated in East Grinstead and Felbridge.

❖ **No alerts on the Council's website ...**

- Neither the main landing page nor the main 'Planning and Building' page make ANY reference to the consultation.
- The Council's dedicated 'Consultations' page advertises only a 'Public Spaces Protection Order – Dog Control Consultation', and says NOTHING about the Site Allocations consultation.

❖ **No alerts in Mid Sussex Matters ...**

- MSDC's own magazine is distributed at taxpayers' expense 3 times a year to 73,000 households in Burgess Hill, East Grinstead, Haywards Heath and Mid Sussex villages.
- MSDC say that *"Wherever possible, details of forthcoming consultations are included within the magazine, this is our preference as it reaches every household in the district. However publication dates and consultation dates do not always coincide."*
- The Spring 2020 edition failed to mention the Site Allocations consultation but did alert readers to the review of the local plan not due to start until 2021.

2. The Council has failed to adequately assess all potential sites

Unsound because ...

- ☒ Alternative sustainable sites that would better meet Crawley's unmet need were summarily discarded without due consideration
- ☒ So-called 'High Performing Sites' were not adequately assessed against acknowledged Highway constraints or EGNP policies

- ❖ The purpose of the Site Allocations DPD is to meet the Inspector's requirement for MSDC to allocate sites to help accommodate Crawley's unmet need, which they had failed to take account of in their submitted District Plan.
- ❖ Deliverable sites nearer to Crawley have been dismissed without proper regard to their overall sustainability and without being assessed against any of the 17 planning considerations imposed on the sites allocated in the DPD.
- ❖ National planning policy (NPPF) says that development plans should be prepared on the basis that all reasonable alternatives are explored. Two significant deliverable and sustainable options were dismissed without due consideration.
- ❖ The site put forward at Crabbett Park (SHEELA Reference 18) could provide up to 2,300 homes close to the Crawley and could be linked into the Fastway public transport system. This would allow future residents ready access to Crawley's extensive services, infrastructure and employment opportunities using sustainable transport.

- ❖ Developers Mayfield have put forward a proposal for a new, sustainable, mixed-use, garden village south of Crawley (Mayfields Market Town) in which the developer has undertaken to provide a comprehensive range infrastructure services before the site is occupied. Whilst Horsham DC have engaged positively with Mayfield, MSDC have failed to do so.
- ❖ MSDC say that all sites in the DPD must be 'contiguous with an existing settlement' as set out in policy DP6. This policy was not designed to take account of housing shortfalls in neighbouring authorities and is insufficiently flexible. NPPF paragraph 81 says that "*planning policies should be flexible enough to accommodate needs not anticipated in the plan*".
- ❖ MSDC officers confirm that the site at Crabbett Park was rejected solely due to its lack of 'Connectivity with existing settlements'. They say that ... "*The criteria established to assess the degree of separation is based on a distance of 150m from the built up area boundary (as defined on the Policies Maps)*".
- ❖ This is an error in fact - the site at Crabbett Park is less than 100m from the built-up boundary of Crawley, meaning that the selection process was unsound and the site rejected on spurious grounds.
- ❖ The sites in East Grinstead & Felbridge were evaluated as 'high performing sites' without any evidence being presented to show that the assessment took account of the widely reported traffic constraints or relevant neighbourhood plan policies.
 - The site assessment section on 'highways', arguably the most relevant to the sites along the A264/A22 corridor, was left blank.
 - No evidence is offered to show that policies EG2, EG2a or EG11 were genuinely considered or that they played any role in the overall assessment of sites.

3. Allocation of sites SA18, SA19 & SA20 would lead to reduced opportunities for people to live and work within their communities

Unsound because ...

- ☒ Unsustainable separation of homes and employment space

- ❖ There is no housing shortfall in East Grinstead or Felbridge where the housing need is fully satisfied by the 782 homes already completed since the start of the plan period together with the 1,238 homes already committed ...
 - 714 with permission as at April 2014
 - 270 allocated in the Neighbourhood Plan
 - 254 permitted since April 2020

[Source: MSDC Housing Land Supply 'Completions and Commitments' 2020]
- ❖ The proposed sites are required to meet a housing shortfall in Crawley for about 1,500 new homes. Nearly half of these are proposed for two sites in East Grinstead and Felbridge. Alternative and more sustainable development sites on the edge of Crawley have been dismissed without proper consideration.

- ❖ The proposed site allocations at East Grinstead and Felbridge run counter to District Plan strategic objectives to support sustainable economic growth. A stated aim of Policy DP1 is *“to provide opportunities for people to live and work in their communities, reducing the need for commuting”*.
- ❖ The DPD proposes 9 new employment sites elsewhere in the district but none in East Grinstead or Felbridge.
- ❖ Felbridge is a medium sized village with very limited employment opportunities and East Grinstead has suffered a very significant loss of employment space since the beginning of the plan period.
- ❖ A key finding of the Mid Sussex Economic Profile Study (2018), says that *“There has been a significant loss of floor space to residential conversions particularly in East Grinstead.”* This study reports 19,440m² of commercial office space in East Grinstead.
- ❖ Since then East Grinstead’s stock of office space has continued to decline, with 12,000m² (62%) being lost as a result of a single planning permission for the conversion of East Grinstead House in June 2020.
 - The East Grinstead Business Association objected to the conversion, saying that we have lost *“7 existing, long standing, large and well known successful local businesses that have live leases and in combination employ around 1,000 people”*
 - The conversion will yield another 253 homes, with potentially double the number of new residents needing to commute out of East Grinstead for work
 - Large sites do not contribute towards the MSDC windfall targets but unplanned homes on this scale should count towards the number of homes the Site Allocations DPD is required to provide
- ❖ MSDC confirm that they do not monitor the amount of office floorspace lost through residential conversions, so have no evidence to show that the 772 homes proposed for East Grinstead and Felbridge are sustainable. Potentially, there could be 1,500 new residents and no new employment space.
- ❖ Increasing traffic congestion and loss of employment space act as significant constraints on economic growth and investment. Another stated aim of Policy DP1 is *“to promote a place which is attractive to a full range of businesses, and where local enterprise thrives”*.

4. Allocation of sites SA18, SA19 & SA20 would lead to unsustainable traffic congestion with local junctions already over capacity

Unsound because ...

- ☒ Material up-to-date traffic evidence is being withheld from the consultation process
- ☒ The MSDC strategic transport assessment understates baseline traffic conditions
- ☒ Despite this, the model highlights a severe cumulative impact in-combination with allocations in the adopted plan
- ☒ There are no demonstrable highway mitigation proposals

- ❖ Multiple traffic studies confirm that the local highways network is a significant constraint to development in East Grinstead and threatens its future economic sustainability. The East Grinstead Neighbourhood Plan states that *“The constrained nature of East Grinstead’s current infrastructure is by far the greatest challenge facing the town in the immediate future, with existing roads and junctions already over capacity.”*

- ❖ MSDC has published a revised transport study by SYSTRA as evidence to support the Site Allocations DPD. They have also jointly commissioned WSP to carry out a study into Felbridge A264/22 junction capacity and to look in detail at options to alleviate congestion.

WSP Study

- ❖ An Executive Summary Report dated October 2019 was published by Tandridge District Council but this report has NOT been disclosed by MSDC. It is understood that MSDC is refusing permission to release the full report for consultation.
- ❖ The WSP Executive Summary concludes that the A264/A22 junction in Felbridge is currently operating over capacity ...
 - *"The Felbridge junction has been identified as a constraint to development coming forward in Tandridge and the Felbridge/East Grinstead area. The junction currently operates above capacity leading to congestion during peak periods and at other times of the day."*
 - The congestion figures for the A264 approach arm were measured in 2018 ...

	AM Peak	PM Peak
Junction Capacity *	106.60%	101.40%
Vehicle Queue Length	48	33
Queuing Delay	3 mins 2 secs	1 min 55 secs

* 100% is deemed to be a junction's theoretical capacity

- ❖ The WSP Executive Summary confirms that their recommended option requires the compulsory purchase of 3rd party land and while it offers a temporary improvement over the 'do nothing' option, it was unable to prevent the junction becoming over capacity once again by the end of the plan period.

SYSTRA Report

- ❖ The MSDC strategic transport study predicts that most major junctions in East Grinstead and surrounding area will be over-capacity by the end of the plan period BEFORE considering the additional impact of the proposed allocations.
- ❖ The SYSTRA model predicts that the 772 houses being proposed for East Grinstead and Felbridge will significantly increase the current levels of 'rat running' along residential streets and country lanes.
- ❖ The SYSTRA model attributes the severe capacity issues to houses already allocated by the 2018 District Plan and argues that the impact of the proposed DPD allocations taken separately is not sufficient to trigger the National Policy 'residual cumulative impact' test ...
 - NPPF paragraph 109 states that *"Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe."*
 - The impact of traffic from sites proposed in the Site Allocations DPD is not separate from the traffic impact from sites allocated in the Local Development Plan. The Sites Allocation DPD is allocating sites within the District Plan as instructed by the inspector, in order to rectify MSDC's earlier failure to take account of Crawley's unmet need in its submitted draft District Plan.
 - MSDC argue that traffic generated by the Local Development Plan is an 'existing situation' and can be ignored when applying the 'residual cumulative' test. This is untenable.

- ❖ The SYSTRA model relies on adjusted traffic data from 2008. This significantly understates the existing levels of congestion at the A264/A22 junction in Felbridge when compared with the WSP model using data collected in 2018.

	SYSTRA Model			WSP Model	
	AM Peak	PM Peak		AM Peak	PM Peak
Junction Capacity	61%	65%		106.60%	101.40%
Vehicle Queue	2	3		48	33
Queuing Delay	15 secs	21 secs		3 mins 2 secs	1 min 55 secs

- ❖ MSDC have chosen not to publish the findings of the more recent WSP traffic study and are therefore considered to be withholding material evidence from the consultation process, preventing residents being informed of the expected consequences of development.

No Deliverable Mitigation

- ❖ To mitigate the impact of the proposed allocations in East Grinstead, MSDC makes vague references to an 'A264/A22 corridor improvement project' and a project to deliver unspecified 'Bus priority along the A22'. There are no deliverable or specific proposals in the Infrastructure Delivery Plan and no secure funding.
- ❖ WSP were jointly commissioned to investigate improvement options on the A264/A22 in 2018 but MSDC have chosen not published the findings. The WSP Executive Summary calls into question the deliverability of the sites at East Grinstead and Felbridge.
- ❖ There are no proposals for highway interventions in the Site Allocation DPD or Sustainability Appraisal to mitigate the impact of the proposed sites in East Grinstead and Felbridge, either alone or in combination with sites already committed in the Local Development Plan.
- ❖ This Site Allocation DPD is therefore contrary to national policy ... NPPF paragraph 108 states that "*In assessing sites that may be allocated for development in plans, or specific applications for development, it should be ensured that: any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree.*"

5. Allocation of sites SA19 & SA20 would be contrary to the NPPF and the Local Development Plan

Unsound because ...

- ☒ Sites SA19 and SA20 are in conflict with Neighbourhood and District Plan policies
- ☒ Proposed site allocations at Felbridge and Imberhorne Farm are outside the East Grinstead/Felbridge built-up boundaries and are therefore against policies EG2, EG2a, DP12 and DP13
- ☒ In the absence of demonstrable proposals to resolve the local junction capacity issues, the site allocations in East Grinstead and Felbridge are in conflict with policies EG11 and DP21

- ❖ At a review of Neighbourhood Plan policies on 3rd May 2018 following the adoption of the District Plan, MSDC confirmed that apart from policy EG5, the Neighbourhood Plan was in conformity.
- ❖ Policies EG2 and EG2a are designed to resist development outside the built-up boundary and "to ensure that development does not result in the gradual accretion of development at the urban fringe". These policies conform to MSDC's own policies DP12 and DP13, which say ... "*The primary objective of the District Plan with respect to the countryside is to secure its protection by minimising the amount of land taken for development and preventing development that does not need to be there.*"

- ❖ It is not clear why MSDC believe the houses to meet the housing shortfall in Crawley are best located in the countryside in the gap between the Felbridge and East Grinstead, outside their urban boundaries when sustainable sites adjacent to Crawley have not been properly evaluated.
- ❖ The proposed site allocations SA19 and SA20 are outside the East Grinstead & Felbridge built-up boundaries and are therefore against both Neighbourhood and District Plan policies [EG2, EG2a, DP12 & DP13].
- ❖ The supporting text to policy EG2 (at paragraph 4.9) explicitly calls for development to be refused in the areas of countryside at Imberhome Farm and south of the Crawley Down Road ... precisely the location of the proposed sites SA19 and SA20.
- ❖ Policy EG11 was designed to ensure that East Grinstead didn't have to accept housing allocations like these without compensating improvements to the local highways network being delivered ... *"Proposals, which cause a severe cumulative impact in terms of road safety and increased congestion, which cannot be ameliorated through appropriate mitigation will be refused"*.
- ❖ Policy EG11 fully supports policy DP21 which requires that ... *"development is accompanied by the necessary infrastructure in the right place at the right time that supports development and sustainable communities. This includes the provision of efficient and sustainable transport networks"*.

6. Allocation of SA19 would represent an unacceptable extension to Felbridge village and result in coalescence with East Grinstead

Unsound because ...

- ☒ SA19 is contrary to the spatial housing objectives of policy DP6
- ☒ SA19 is contrary to Neighbourhood Plan policies EG2 and EG2a and corresponding District Plan policies DP12 and DP13

- ❖ Felbridge is a rural village in Surrey with a small strip of land south of the Crawley Down Road falling within the administrative boundary Mid-Sussex.
- ❖ TDC acknowledge in its Settlement Hierarchy Addendum 2018 that *"although the proximity of East Grinstead plays a role in Felbridge's sustainability, the settlement itself can only demonstrate a basic level of provision and as such is categorised as a Tier 3 (rural settlement)"*
- ❖ However, MSDC is treating the land south of the Crawley Down Road as an extension to East Grinstead without due regard for its village status or the gap between the two distinct communities.
- ❖ With no more frontage sites available along the Crawley Down Road, MSDC are allowing the extension of the village towards East Grinstead, with 120 homes recently approved as back land developments. With a current population of 532 homes, the existing commitments will increase the number of homes by nearly 25%. The village has no doctor's surgery, pharmacy, dentist, opticians and only a small convenience store. Infrastructure contributions and subsequent council taxes will go to centrally to MSDC in Haywards Heath with no plans to improve meagre services in the village.
- ❖ The proposal to allocate SA19 as an additional back land site for 200 homes south of the Crawley Down Road would result in an increase in the number of homes by a further 30%; without any plans or funding to improve infrastructure that would mitigate the harm to the function and character of the village.

- This is contrary to policy DP6 (Settlement Hierarchy) which allocates a much smaller proportion of housing requirement to Tier 3 medium sized villages.
- The strategic aims of policy DP6 are ...*"To promote well located and designed development that reflects the District's distinctive towns and villages, retains their separate identity and character and prevents coalescence"*, and *"To create and maintain town and village centres that are vibrant, attractive and successful and that meet the needs of the community"*.
- ❖ The proposed site is located outside the built-up boundaries of both Felbridge and East Grinstead. This is contrary to policy DP12 (Protection and enhancement of countryside) which says that ...*"The primary objective of the District Plan with respect to the countryside is to secure its protection by minimising the amount of land taken for development and preventing development that does not need to be there"*.
- ❖ The site allocation is also contrary to the strategic aim of policy DP13 (Preventing Coalescence) ...*"To promote well located and designed development that reflects the District's distinctive towns and villages, retains their separate identity and character and prevents coalescence."*
- ❖ The East Grinstead Neighbourhood Plan expressly lists the land to the south of Crawley Down Road as contrary to policies EG2 and EG2A to ensure development "does not result in the merging or coalescence of settlements and the gradual accretion of development at the urban fringe".

7. Allocation of SA19 would result in loss of valued agricultural land and habitat, harm the setting of heritage assets and result in coalescence with the village of Felbridge

Unsound because ...

- ☒ SA19 landscape assessment not supported with evidence
- ☒ SA19 contrary to DP34 and NPPF paragraph 175

- ❖ Site allocations SA20 is surrounded by high yielding agricultural land that justifies an Agricultural Land Classification Grade of 3a (ie. the best and most versatile agricultural land).
 - District Plan DP12 says that *"Where identified, Grade 1, 2 and 3a agricultural land should be protected from development due to its economic importance and geological value. This is the land which is most flexible, productive and efficient and can best deliver future crops for food and non-food uses."*
 - The Sustainability Appraisal reports that the Council currently lacks data to distinguish Grade 3 from 3a agricultural land and assumes a default classification of 3 without evidence.
 - The planning assessment proforma rates the SA20 site location as having a 'positive impact' on the Landscape without any explanation or evidence to support the officers' opinion.
- ❖ Site allocation SA20 is adjacent to the Grade II Listed Gullede Farmhouse and Imberhorne Farm Cottages
 - The rural setting of these listed buildings is important to their value as heritage assets and development on the site would overwhelm the buildings and result in significant harm
 - District Plan policy DP34 says that *"Special regard is given to protecting the setting of a listed building"*

- ❖ The proposed site also lies adjacent to a substantial area of ancient woodland which is already 'hemmed in' on two sides by residential and industrial development. Further development would serve to isolate the woodland from the surrounding countryside resulting in unnecessary habitat fragmentation ...
 - Ancient woodland is classified by National Planning Policy as an 'unreplaceable habitat' and NPPF paragraph 175 says *"development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons"*
 - Natural England states that *"Ancient woodland and the wildlife it supports are particularly vulnerable to various impacts associated with nearby residential areas. These include recreational disturbance, fly tipping, light pollution, introduction of non-native plant species from garden waste, predation of wildlife by pet cats and pollution from dog faeces"*
 - These harmful impacts can only be mitigated to a limited degree by the imposition of a buffer zone.
- ❖ The farmlands at the proposed SA20 site location provide an important breeding habitat for 'red list' bird species such as the Skylark and Yellowhammer with loss of habitat being the main reason for the sharp population decline.
 - The developer's own Ecological Survey acknowledges that the Skylark *"requires more specialised ground nesting provisions"* and that the ability of the SANGS to compensate for the loss of farmland habitat is limited due to recreational disturbance.
 - NPPF paragraph 175 says that *"if significant harm to biodiversity resulting from a development cannot be avoided, adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused."*

PART D – ADDITIONAL CONCERNS I HAVE AS AN EAST GRINSTEAD RESIDENT

IN MARCH 2020 HOUSING SECRETARY ROBERT JENRICK UNVEILED INITIAL HOUSING PROPOSALS AHEAD OF A PROMISED WHITE PAPER, INCLUDING AN AMBITION FOR AN 'INFRASTRUCTURE FIRST' APPROACH TO PLANNING.

Cllr Philip Atkins, housing and planning spokesperson for the County Councils Network, said:

"The Housing Secretary's ambition to move to an 'infrastructure first approach' to planning chimes with what many communities in county areas would like to see. More homes are being built – but we need to move away from simply planning by numbers to instead making sure that new developments do have access to the right amenities – both for existing and new residents.

This present proposal gives no clear proof that this is happening, rather the opposite will happen if this proposal goes ahead with East Grinstead, Crawley Down and the Police Station having nothing included to provide the sort of environment present residents are lacking, nor future infrastructure required for the new developments.

Generic Concerns

- ❖ Most schools in these areas are oversubscribed; new developments only increase the pressure on this. It is widely acknowledged the town already needs additional schools. These should be put in place prior to any new development as per the housing minister's proposals.

- ❖ There is much talk about improving infrastructure, there is no mention what will be done, how or who will pay for this. The proposal just mentions 'contributions', which are not specific and tend to be proven unreliable.
- ❖ The greenfield space around East Grinstead is slowly but surely being eroded, to the detriment of its residents. When will it stop? It has become an overdeveloped town with too much traffic with an increasingly poor infrastructure.
- ❖ Local habitat could be destroyed.
- ❖ Increased pressure on parking in Town, at the station and residential roads around it. I live in a road near the station and suffer with commuter parking and the issues this brings, this can only get worse with increased commuters.
- ❖ GPs and QVH have limited facilities and extremely stretched.
- ❖ Trains only travel north and buses are far too few with insufficient frequency and stop running far too early. Result of new housing equals extra traffic and associated pollution.
- ❖ There is little employment in EG, majority of workers commute to places outside of town, very many by car. If they work in London they will need transport to the station, which is not walkable in a reasonable time. Roads around the station will get more commuter parking.
- ❖ On top of all the current and proposed developments many large office blocks are or are being converted into, apartments. There could well be a situation where supply outstrips demand leading to property values decreasing.
- ❖ Parents will not stop driving their children to school safely given their fears of walking or cycling or putting them on a bus alone.

My specific concerns with each site are below; they are based 'pre-Covid':

Proposed Imberhorne Development – SA20

- ❖ This land is an arable greenfield site, can the country afford to be losing this facility as we move out of the EU?
- ❖ The town is already in need of much improved infrastructure: Schools, both primary and secondary already oversubscribed; GPs, one currently closed to new patients and the other two have been in recent times, plus of course improved transport, including roads. It is common knowledge that there is a minimum four week wait to see a GP.

- ❖ The access roads to the site must use Imberhorne Lane which is often subject to long delays due to congestion. The additional cars from the proposed 550 dwellings will clearly make matters worse both along this road and surrounding areas, specifically the A22 corridor.
- ❖ Cycle routes need coordinated planning; the current 'temporary trial' cycle lane along the A22 has proved a failure having been declared dangerous, and removed.
- ❖ Lack of connectivity from the proposed site into town as it is too far to walk, minimum 30 minutes from Imberhorne Lane, much longer from Felbridge, so the car will be used. There is insufficient parking in town currently, leading to parking in residential roads nearby.
- ❖ Imberhorne school needs to be rebuilt not extended. The plan to incorporate the Imberhorne Lower school at Imberhorne Lane has been in place for a number of years, the site at Windmill lane is planned for redevelopment. How will the 'extended' school meet the demand from the lower school move and the new residents?
- ❖ Where will the funding for specialist facilities and associated staff come from for the SEN activities, currently this is part funded by the Government. The mention of this implies something more will be added to an ever decreasing SEN local and national budget.
- ❖ There is no guarantee the green corridors will remain as the whole development would be using land designated for greenfield/arable pasture. This development will not be sustaining the landscape, it will be destroying it.

Felbridge – SA19

Most of the above equally applies to this site with respect to infrastructure requirements. And residents will be using the same schools, same town and the same roads.

- ❖ The access roads to the site must use Crawley Down Road which is often subject to long delays due to congestion. The additional cars from the proposed 200 dwellings will clearly make matters worse both along this road and surrounding areas, specifically the A22 corridor
- ❖ Will the pasture land be put to better use for agriculture as we have left the EU?

- ❖ Children attending Imberhorne will not have access to the school bus given the site is less than 3 miles from the school, so parents will have to drive them in. The walking route takes in the A264, A22 and Imberhorne Lane which are heavily used and hence leading to increased traffic pollution.
- ❖ The potential Flood risk issue with Felbridge water.
- ❖ Only a Small play space to be provided.

Police Station- SA18

- ❖ Are these dwellings really needed by the town? A quick search on 'Rightmove' shows 198 flats for sale in East Grinstead, many being 'new homes'. The number of office blocks being converted into dwellings is significant and will only add to this number. Loss of office space in town has decreased business and employment opportunities.
- ❖ The proposed site lies inside the Eastcourt area of the Town and is a public amenity. As such it should not be sold for the benefit of a developer to provide 'high end' accommodation in park land. The site should be preserved for the use of the town for recreational and educational purposes.
- ❖ Access to the site is onto the A264 near the Blackwell Hollow/Mount Noddy roundabout. The East arterial road for East Grinstead. This is opposite the planned development at Blackwell Farm Road. Leaving the site will only be onto the roundabout leading to further congestion at a busy junction. If there are plans to use the other entrance to Eastcourt, this will increase traffic through the park putting the public using the facility at increased risk.

PART E – ACTIONS I AM SEEKING

I request that the following action is taken with respect to the draft Site Allocations DPD and associated documents:

1. The DPD should be withdrawn as it is not legally compliant - the consultation was not carried out in line with national policy or the MSDC Statement of Community Involvement.
2. The WSP transport report should be published in full and its findings submitted for consultation.
3. The proposed allocations at East Grinstead and Felbridge should be withdrawn as they cannot be delivered sustainably.
4. MSDC should withdraw the DPD and carry out a proper evaluation of sustainable sites close to Crawley including Crabbet Park and Mayfield.

5. In the event that the Inspector decides the DPD should progress to Examination then any allocations at East Grinstead or Felbridge should be made contingent on delivering the junction improvements identified in Atkins 3 and the WSP studies.
6. MSDC to carry out a survey to establish the current levels of 'traffic pollution' at the A22/A264 and the A22/Imberhorne Lane junctions. The results to be compared against acceptable safe levels and what the impact of an increase of 750 households in the immediate area would have on these levels.
7. MSDC to explain why East Grinstead/Felbridge is expected to provide housing caused by the shortfalls in Crawley when there are significant developments underway around the M23/A264 junction, along the M23 and along the A264 corridors.
8. MSDC to provide number of Pupil places available in East Grinstead currently against the expected demand from new residents.
9. 'New' local developments in recent years have not adequately planned for the parking requirements of the households. How will MSDC ensure the Developer will provide adequate parking on this development? Failure to do so will impact adjoining areas.
10. MSDC to how the additional SEN provision at Imberhorne School can be met against the current shrinking SEN fund provided by the Government and what will be the impact when spread across the increased number of students.
11. MSDC to explain how it will ensure the developer will deliver all the 'promised' infrastructure improvements, or like so many cases we hear of will they slowly but surely not become reality?
12. MSDC to state what they will do to improve the existing 'failing' town infrastructure, and how will success be measured in the following areas:
 - a) NHS providers, e.g. GP access and QVH.
 - b) Education.
 - c) Transport.
 - d) Police presence.
13. MSDC to guarantee no further development at all three sites on surrounding land IF these proposals proceed, will precedents be set. I sincerely hope these are not 'thin edges of wedges' eating into our agricultural, pastures and public spaces.
14. MSDC to explain why the school is being extended and not 're-built' or a new school built in order to meet growing pupil numbers and provide improved educational and recreational facilities that could be used by the wider community. Currently the school is not fit for purpose, particularly being located on two sites, Imberhorne Lane and Windmill Lane.
15. MSDC to detail the size of 'public Space' on the Imberhorne site to be provided as far too much open space is being 'developed'.

16. The Imberhorne school proposal states 'Gypsies and Travellers and Travelling Showpeople provision may be required'. East Grinstead is currently not listed as a potential site for these people. MSDC to declare if this has changed?
17. The Felbridge site has one access road onto the Crawley Down Road with most traffic leading onto the A264 and then A22. East Grinstead is well known for not having a 'fit for purpose' road system for many years with the counties involved never agreeing a way forward. There appears no scope to improve what is there, what does the developer intend to collaboratively do with the local councils?
18. MSDC to conduct a survey of traffic use at the A264/Mount Noddy roundabout and impact of proposed developments at the Police Station and Blackwell Farm Road
19. to establish increased use and pollution levels.
20. I do not wish to take part in the Examination but I support the arguments made by the Infrastructure First Group with respect to SA19 and SA20 and would like them to represent me at the Examination. My contributions with respect to S18 are my representation.

1831

Site Allocations DPD: Regulation 19 Consultation Response

Policy: SA18

ID: 1831

Response Ref: Reg19/1831/2

Respondent: Ms G Lewis

Organisation:

On Behalf Of:

Category: Resident

Appear at Examination? x

[REDACTED]

From: [REDACTED]
Sent: 25 September 2020 16:14
To: ldfconsultation
Subject: Proposed Housing Developments in East Grinstead
Attachments: Site_Allocations_DPD_Regulation_19_Response.docx

Categories: SiteDPD

Dear Sirs,

Please find attached the completed letter from Infrastructure First confirming my agreement with the issues they have raised.

In addition I would like to add that I am outraged at the proposal to build houses in East Court on the old Police Station site bad enough to have lost the Police Station and the Police Officers that went with it, but how anyone could think that more houses in an area predominantly parkland and the only park in East Grinstead would be in any way acceptable to the residents who live in the town and use the park regularly. Why don't you just turn the whole area into housing along with the schools, doctor's surgeries and traffic easing plans (love to see how that can be achieved given the current state of the A22 ?) that are always included in the plans for each housing development but strangely never materialize ?

Kind regards,

Gill Lewis

1877

Site Allocations DPD: Regulation 19 Consultation Response

Policy: SA18

ID: 1877

Response Ref: Reg19/1877/2

Respondent: Mr A Jordan

Organisation:

On Behalf Of:

Category: Resident

Appear at Examination? x

From:

Andrew Jordan



Subject:

Proposed Building Plans for Imberhorne Farm (500), Felbridge (200), Crawley Down (50), East Grinstead Police Station (22).

Dear Sirs

I would like to register my objection to what I believe to be an ill thought out plan for additional housing expansion in Felbridge and the surrounding areas.

There are 4 main queries that I have:

1. There was a Strategic Gap between the Felwater and the properties along Crawley Down Road, to stop any development creep. Why is this now not being considered?
2. Pre lock down, in the AM rush hour it could on occasions take up to nearly 40 mins (I once measured 37 mins) to get from our house 125 Crawley Down Road to the Copthorne Road – approx. ½ mile, due to volumes of traffic and school ‘drop offs’

This as a current situation is un-workable. How will an additional 200 houses, probably 300 more cars, help ease this. It can only end in disastrous levels of congestion.

I don't believe there is any simulated modelling on traffic assessments that can replicate the pre lockdown congestion levels. If only because this situation is unprecedented, and so by definition, there cant be any reliable and robust data to use for modelling.

Logically, the only possible outcome of any traffic assessments will be to conclude that the bottle-necks around Felbridge will unquestionably become significantly worse.

3. I thought there were to be no more significant developments until a Ring Road had been approved. Congestion around the A264 & A22 x-over is already unbearable. The current traffic congestion represents a seriously negative impact on new business considering East Grinstead as a possible location. Adding more housing and vehicles can only make this worse.

If there is no new business development locally, then EG will become even more of a dormitory town, with the need for the use of more vehicles.

Local Public Transport is not an option as heading towards Crawley or Tunbridge Wells can only be done by buses which are subject to congestion, and the rail link only heads ‘one-way’. Introducing the extra housing, on top of the 2k houses already planned is utter madness, unless the transport infrastructure is radically amended.

Planners may think they have the answers with some partial priority bus lanes / schemes, but so far, even with the existing plans, nothing has materialised.

This is not a good track record, a track record that should be considered carefully.

It's essential to sort out the traffic infrastructure before rushing headlong into building new houses. If you are going to do it, then do it properly. As mentioned earlier previously, a prerequisite for the only way forward for an additional housing expansion was the implementation of a by-pass. How is it now possible to consider these developments without dealing with the congestion issues?

4. Flooding

The field behind our property floods regularly and the water does not drain away naturally. It filters into our garden which then also floods front and rear – photos attached.

This water amounts 100's of litres and eventually finds its way into drains.

Are the planners aware of the flooding at the north side of the field, that due to its height cannot drain to the Felwater and would need pumping, and what is the proposal to deal with it?

The current set up is inadequate.

I would be grateful if you could consider the above issues raised and let me have your feedback and response.

Yours sincerely
Andrew Jordan



1930

Site Allocations DPD: Regulation 19 Consultation Response

Policy: SA18

ID: 1930

Response Ref: Reg19/1930/2

Respondent: Ms A Rijndorp

Organisation:

On Behalf Of:

Category: Resident

Appear at Examination? x

[REDACTED]

From: Andrea Rijndorp [REDACTED]
Sent: 27 September 2020 10:18
To: ldfconsultation
Subject: Proposed housing developments in Felbridge, East Grinstead and Crawley Down

Dear Sirs,

Whilst realising that new homes are needed, the areas you have designated to build on are already suffering from too many new houses and no corresponding infrastructure.

We live in Felbridge, even without the current Corona problems, we have been finding it increasingly difficult to make a doctors appointment. Our surgery tells us that this difficulty arises because of sheer weight of patient numbers as no new surgeries have been opened despite the influx of new housing in the area.

Local schools have had to limit new intakes to those children who have siblings already attending the school in question. This forces parents to drive to schools that are too far away from their homes to walk to.

The traffic in the Felbridge and East Grinstead area, not only during rush hour but also during the entire day, has certainly doubled since we moved here 18 years ago. Having had a family emergency last year where I needed to reach Croydon University Hospital urgently I can assure you, that thanks to very heavy traffic, I was unable to reach the hospital in time. On the day in question I did not even attempt to drive there as I was aware that it would take too long. Instead I tried to reach Lingfield Railway Station but ended up sitting in heavy traffic. Clearly, no attempt to gauge the amount of current traffic has been made by the Council before these plans were submitted.

Surely the Council should take the current occupants of the affected areas into consideration before making such far reaching plans. The impact on the lives of the current occupants seems to be totally disregarded by the Council.

Your comments would be welcomed.

Yours faithfully,
Andrea Rijndorp

Sent from my iPad

2002

Site Allocations DPD: Regulation 19 Consultation Response

Policy: SA18

ID: 2002

Response Ref: Reg19/2002/1

Respondent: Mr R Burleigh

Organisation:

On Behalf Of:

Category: Resident

Appear at Examination? x

Name	Raymond Burleigh
Job title	Retired
Address	[REDACTED]
Phone	[REDACTED]
Email	[REDACTED]
Which document are you commenting on?	Site Allocations DPD
Sites DPD Policy Number (e.g. SA1 - SA38)	SA18, SA19, SA20
Do you consider the Site Allocations DPD is in accordance with legal and procedural requirements; including the duty to cooperate	No
(1) Positively prepared	Unsound
(2) Justified	Unsound
(3) Effective	Unsound
(4) Consistent with national policy	Unsound
Please outline why you either support or object (on legal or soundness grounds) to the Site Allocations DPD	I totally object to proposals SA18, SA19 and SA20 which are far too large for East Grinstead. The town is already overdeveloped and suffers from daily chronic traffic congestion on the A22 north of the town and on the A264 approaching Felbridge. The extra traffic generated by these three developments will simply contribute to bringing traffic to a standstill in the Felbridge and Imberhorne Lane areas at rush hour times. Plus we already have a situation where people wanting to go shopping always regularly avoid East Grinstead, preferring instead to drive to other centres. All to the detriment of our own shopkeepers in London Road and the High Street. Instead of developing the town more housing will, in fact, choke it to death. As it is the daily exhaust pollution from traffic fumes from tail backed vehicles in London Rd/ Felbridge is a disgrace and the air quality should be properly investigated against national and EU standards.
Please set out what change(s) you consider necessary to make the Site Allocations DPD legally compliant or sound, having regard to the reason you have identified at question 5 above where this relates to soundness.	Abandon SA18, SA19 and SA20 on environmental grounds as set out above.
If you wish to provide further documentation to support your response, you can upload it here	
If your representation is seeking a change, do you consider it necessary to attend and give evidence at the hearing part of the examination	No, I do not wish to participate at the oral examination
Please notify me when-The Plan has been submitted for Examination	yes
Please notify me when-The publication of the recommendations from the Examination	yes
Date	27/09/2020

2140

Site Allocations DPD: Regulation 19 Consultation Response

Policy: SA18

ID: 2140

Response Ref: Reg19/2140/4

Respondent: Mr C Hough

Organisation: Sigma Planning Services

On Behalf Of: Rydon Homes Ltd

Category: Promoter

Appear at Examination? ✓



MID SUSSEX DISTRICT COUNCIL
SITE ALLOCATIONS DEVELOPMENT PLAN DOCUMENT

REGULATION 19
SUBMISSION DRAFT
SEPTEMBER 2020

REPRESENTATIONS
ON BEHALF OF
RYDON HOMES LTD

September 2020



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I.0 Housing Numbers and Distribution

1.1 The Plan states that the remaining residual requirement from 2019 is 1280 units following updated completions, commitments and windfall figures. However, the total allocations in the plan amount to 1764 dwellings – an additional 484 units. This confirms that the Plan is positively prepared and compliant with the Framework because :-

- the remaining residual requirement will include some housing that is already delivered.
- the District Plan housing target is a minimum figure and Government policy seeks to boost rather than cap housing provision.
- the allocation need to compensate for slow delivery from strategic allocations which may be delayed towards the latter end of the plan period to 2031, or even beyond
- the windfall figure has been increased but there is no compelling evidence that the level will continue to prevail. Also the increased figure is simply a statistical adjustment to include sites of 1-9 units rather than 1-5 units.
- adjoining local authorities at Brighton, Crawley and Tandridge are under-delivering on their housing requirements and will increasingly need assistance in meeting their housing requirements. Mid-Sussex is comparatively less constrained and should be anticipating being able to assist in addressing unmet need from adjoining authorities.

1.2 The overall supply from Table 2.3 is 16,874 which aims to exceed the District Housing requirement by 484 dwellings by the end of the plan period, but there is bound to be slippage and the flexibility of a 2.7% over-provision is supported in principle. However, the figures are not precise and it is considered that this is still a fragile margin to compensate for non-delivery – particularly in the strategic housing allocations. The margin should be greater and a 10% non-delivery margin is standard practice. An over provision of 1639 dwellings is therefore justified and can be achieved by further allocations of sites that do not raise serious adverse impacts and are able to be confidently expected to deliver housing in the plan period to compensate for non-delivery elsewhere.

1.3 The identification of further allocations to increase the Plan's robustness and flexibility would still be within reasonable parameters of consistency with the District Plan housing targets, which were in any event not fully meeting objectively assessed needs, particularly for affordable housing.

1.4 In terms of distribution the substantial majority of new housing is focussed on the three main towns of Burgess Hill, East Grinstead and Haywards Heath (80% of the minimum District Plan requirement) with the 2nd tier settlements of Copthorne, Crawley Down, Cuckfield, Hassocks and Keymer, Hurstpierpoint and Lindfield contributing a further 18%). This emphasis should be maintained in order to conform with the District Plan and deliver new housing in the most sustainable locations. The

proposed DPD allocations however only propose 6% of the housing is directed to 2nd tier settlements and 13.5% is directed to 3rd tier settlements, many of which are located in the AONB where great weight should be given to conserving landscape and scenic beauty. There are a number of 2nd tier settlements, including Cuckfield and Hurstpierpoint where there are “limited” or no DPD allocations. Such settlements do have the capacity to deliver more housing in the current Local Plan and would be suitable candidates to accommodate any additional provision or provide sites to compensate for less suitable and more constrained sites that are currently proposed allocations but should be deleted from the Plan.

- 1.5 The SADPD allocates a total of 238 new dwellings to Category 3 villages, 183 of these are in the AONB which should be afforded the highest level of protection. Sites should only be released in the AONB in settlements that have a residual requirement to meet, i.e. Horsted Keynes, to recognise the need to sustain and maintain the vitality of these settlements and meet the demand and need for housing, especially affordable housing in these locations. However, in villages that have already met their target, the Council should not be releasing further AONB sites before exhausting non AONB sites, even if it is ‘passed up’ to Cat 2 settlements (Para. 2.4.5 Site selection paper) such as Hurstpierpoint.

2.0 Proposed Allocations that are supported

2.1 Policy SA24 Land north of Shepherds Walk, Hassocks (support with conditions)

This proposed housing allocation is supported. It enjoys outline planning permission for 130 dwellings and it has been demonstrated that the criteria set out in the policy can be fully met.

However, the following comments are made concerning the criteria set out in the Policy:-

1. The wording of the criteria in relation to Biodiversity and Green Infrastructure requires clarification/amendment. It is not clear what is meant by the term “net gain” to biodiversity and it is not possible to avoid any loss of biodiversity. The following alternative wording is therefore proposed.

“ Ensure that there is an overall gain to biodiversity and that any loss is mitigated or, as a last resort, compensated”.

A separate SPD is necessary to format and identify any bio-metric approach to the calculation of net gains to biodiversity.

The criteria in this policy go beyond what is required of Strategic Sites allocated in the District Plan and such an inconsistency is not justified.

The proposed development will be delivered within the five year period to 2025/2026. Rydon would welcome the opportunity of meeting with Officers to discuss how the criteria might be improved.

2. The Brick Clay Resource Mineral Safeguarding Area covers a very extensive area from Petersfield in the west to Burgess Hill in the east and includes most of the northern part of the County of West Sussex. Policy M9 of the West Sussex Joint Minerals Local Plan (2018) seeks to prevent non-mineral development throughout the whole of this very wide area unless minerals are extracted pre-development or there is an overriding need for the development that outweighs the safeguarding of the mineral. Compliance with Policy M9 is a common requirement for most, if not all, housing allocations in the SADPD. It must be assumed that the allocation of a site for housing in the Plan demonstrates an overriding need that achieves compliance with the Policy. It should not be left to be considered as a criteria post-allocation. There is no special suitability for mineral extraction demonstrated by the land north of Shepherds Walk. Therefore the Minerals Criterion should be omitted from Policy SA24, and all other allocations covered by the widespread generic safeguarding area, unless there is a local/known special requirement for safeguarding.

3. Archaeological evaluation has already been carried out on this site and the criterion for evaluation should be changed to “pre-commencement” to allow for the grant of outline consent subject to conditions without a policy requirement to repeat the exercise with associated wasted costs.
4. The Landscape Considerations criteria are too onerous in requiring that all mature trees, as well as protected trees, shall be retained. The TPOs will protect important trees and the landscaping scheme will reflect Policy DP37 Trees, Woodland and Hedgerows of the adopted District Plan in order to be approved. A further policy provision is therefore superfluous and unnecessary, proscriptive and onerous in requiring the retention of all existing hedgerows and mature trees.
5. The criteria are generally unnecessarily detailed for a policy of the adopted development plan and stifle the scope for high quality design and creativity. The criteria need to be re-visited in order to be less proscriptive in detail and concentrate only on the main, more important, planning considerations. This point includes criteria related to drainage strategy.

2.2 Policy SA29 Land South of St Stephens Church, Hamsland, Horsted Keynes (support with conditions)

- 2.2.1 This proposed housing allocation is supported conditionally. The site could be optimised to provide 30 two storey dwellings, internal open space, playspace, surface water attenuation, ecological considerations together with landscaping to soften the external edge of the built area. The site could sit comfortably into the existing pattern of development and align with adjoining residential curtilages.
- 2.2.2 Subject to appropriate conditions, the landscape impact from the development of this site would be low, as recognised by the High Weald AONB Unit in their October 2018 report which assessed the landscape impact from thirteen respective SHEELA sites considered by Mid Sussex District Council. The High Weald AONB Unit concludes that this Site is one of only two sites (out of the thirteen considered) that has the potential to be developed with only low impact on the AONB (as opposed to moderate or high impact).
- 2.2.3 West Sussex Highways Authority have confirmed at the pre application scoping stage, that the site can achieve a safe and suitable means of access for all modes of transport and the development would not materially impact on the operation of the local highway network. Support is also given to the proposed allocation requirement for the improving of local traffic conditions by setting back the existing on-street parking spaces in Hamsland Road into the verge, opposite the site.
- 2.2.4 Support is given to the proposed allocation requirement to enhance important landscape features, including the existing mature hedgerows and trees bordering the adjacent fields. The site is deliverable comfortably within a five year period.

However, there are some concerns with regard to the proposed criteria within the policy.

1. The wording of the criteria in relation to Biodiversity and Green Infrastructure requires clarification/amendment. It is not clear what is meant by the term "net gain" to biodiversity and it is not possible to avoid any loss of biodiversity. The following alternative wording is therefore proposed:-

"... ensure that there is an overall gain to biodiversity and that any loss is mitigated or, as a last resort, compensated".

A separate SPD is necessary to format and identify any bio-metric approach to the calculation of net gains to biodiversity.

The criteria in this policy go beyond what is required of Strategic Sites allocated in the District Plan and such an inconsistency is not justified.

This is a small site with less potential for conflict with NPPF but greater potential for viability to be compromised.

2. The requirement under the heading of Flood Risk and Drainage to provide SUDS in the southern part of the site is too prescriptive and unnecessary. It is also an unnecessary duplication of the Biodiversity criteria elsewhere in the draft policy. Flexibility is required to enable a surface water drainage solution to be tailored to site conditions to provide the optimum drainage solution. This is not a development brief and it is too prescriptive at this stage. The detail can be addressed at the application stage.

Rydon would welcome the opportunity of meeting with Officers to discuss how the criteria might be improved.

3.0 Proposed allocations the subject of objection.

3.1 Policy SA15 Land south of Southway, Burgess Hill

This site is allocated as a Local Green Space in the adopted Burgess Hill NP. Para. 101 of the NPPF states that Policies for managing development within a Local Green Space should be consistent with those for Green Belts. SA does not assess the loss of LGS when determining the sustainability of the site.

3.2 Policy SA16 Land at St Wilfred's School

The SA has not assessed the impact of the loss of the school in a town centre location, sustainable location, close proximity, walking distance to catchment area. Policy DP25 of the LP states that "Where proposals involve the loss of a community facility (including those facilities where the loss would reduce the community's ability to meet its day-to-day needs locally) evidence will need to be provided that demonstrates:-

- that the use is no longer viable; or
- that there is an existing duplicate facility in the locality which can accommodate the impact of the loss of the facility; or
- that a replacement facility will be provided in the locality

The delivery of this site is uncertain. The relocation of a number of public and community facilities has not been settled and the number of residential units may have to be adjusted. At best the site is likely to be delayed and potentially may not come forward at all.

3.3 Policy SA18 East Grinstead Police Station

There are deliverability issues, restrictions on title/covenants that could prevent development of this site. There are heritage assets in the vicinity that will be adversely affected and apartments are not in character with the local area. Numbers of dwellings that can be delivered may reduce as a result. No clear timescale for delivery.

3.4 Policy SA20 Land south and west of Imberhorne Upper School

3.4.1 This site has a long history of non-delivery. The West Sussex Structure Plan 2001-2016 (now revoked) allocated a wider area of land to the west and south-west of East Grinstead for circa 2,500 homes.

3.4.2 The South East Plan 2006-2026 (now revoked) noted that land west and south-west of East Grinstead should be brought forward for circa 2,500 homes.

3.4.3 The East Grinstead Strategic Development Area Action Plan 2006 (which would have formed part of the Local Development Framework if it had been adopted – it was later abolished) set out the detail for the allocation of land west and south-west of East Grinstead.

- 3.4.4 East Grinstead has suffered from large volumes of traffic for many years, with persistent calls for a bypass to be provided from as far south as Forest Row all the way to the north and west of the town since 1988. However, these proposals have not come to fruition and the town remains as a significant location along the A22 between the coast and London.
- 3.4.5 Previous traffic study reports have advised that the existing highway network at the junctions of the A22/A264 and the Imberhorne junction is over capacity during the morning and evening peak periods on a typical weekday and that scope for physical improvements at key junctions is constrained.
- 3.4.6 The site is located immediately adjacent to these two junctions and, given its distance from the town centre, it is considered likely that most day to day retail, community, leisure and commuter trip generation (e.g. Doctors, leisure facilities and access to the main line railway station) will involve vehicular trips movements adding increased volumes of traffic into East Grinstead.
- 3.4.7 The Sustainability Appraisal that accompanied the District Plan concluded that *“there are severe transport constraints within East Grinstead which is likely to limit the amount of strategic development that would be appropriate within the town unless significant mitigation is proposed.”*
- 3.4.8 Any capacity improvements have been exhausted at the two key junctions and further improvements require third party land. The policy is not clear on how the impact on the local highway network will be mitigated and merely states the following :-
- “Provide any necessary capacity and safety improvements to junctions impacted upon by the development in the vicinity of the site after all relevant sustainable travel interventions have been fully explored and their mitigation accounted for.”*
- 3.4.9 At this stage of the process, the deliverability of the sites allocated need to have been fully investigated. The SAD document fails to do this, appendix one refers to Safeguarding of Land for Strategic Highway Improvements, but only includes a picture of the junctions with a red box but no clear strategy for improvements.
- 3.4.10 Mid-Sussex has updated its Transport Study to test the impact of proposed development on the strategic and local transport network and upon significant routes in Ashdown Forest (adjacent to but outside of Mid-Sussex District).

The report concludes the following:-

“Felbridge junctions The A264/A22 junction is not identified as having severe impacts in the Scenarios. However, it should be noted that this junction is flagged as severe in the Reference Case and operates over capacity; the Scenarios generate slightly more traffic passing through the junction, which increases these impacts further, but not enough to result in severe impacts for the Scenarios”.

3.4.11 This suggests that improvements to these junctions will not be required as the impacts from additional traffic will not result in severe impacts but this is a contrived and unreliable conclusion that runs contrary to Paragraph 109 of the NPPF.

3.5 Policy SA21 Land at Rogers Farm, Fox Hill, Haywards Heath

3.5.1 The Policy states that this site is open space. It is a peripheral location with significant landscape and heritage constraints, together with Flood Risk considerations. The site should only be allocated if the constraints have been fully investigated and can be appropriately mitigated.

3.6 Policy SA25 land West of Selsfield Road, Ardingly

3.6.1 Ardingly is environmentally constrained due to its location wholly within the AONB. The remaining residual requirement for the settlement is 22 dwellings. In reaching the overall requirement in the Local Plan DPD the Council, in its Sustainability Appraisal that accompanied the DPD, has had regard to the advice in the NPPF. The Council has examined the evidence to identify the point at which the adverse impacts would significantly and demonstrably outweigh the benefits, particularly when considering numbers to settlements constrained due to the AONB which indicated that development in these locations should be restricted. In the accompanying Settlement Sustainability Review May 2015 the Council concluded that future development in Ardingly should therefore be primarily to meet local needs. However, the SADPD proposes a site for 70 units, which is a major allocation in the AONB. A balance needs to be struck to ensure the positive benefits (social/economic) of allocating a major site within the AONB are not markedly outweighed by the negative impacts (particularly environmental), great weight should be afforded to protect the AONB and the scale and extent of development within these designated areas should be limited, Para. 172 NPPF).

3.6.2 Furthermore the site forms part of the South of England Show Ground and offers cultural and recreational facilities, the loss of which has not been assessed in the SA. This allocation should be fully assessed against the District Plan Policy.

3.6.3 Policy DP24 which refers to proposals that involve the loss of cultural facilities, open space, sports and recreational buildings and land, including playing fields, will not be supported unless :-

- an assessment has been undertaken which has clearly shown the cultural facility, open space, sports land or recreational building to be surplus to requirements; or
- the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or
- the development is for alternative sports and recreational provision, the needs for which clearly outweigh the loss

3.7 Policy SA26 Land South of Hammerwood Road, Ashurst Wood.

- 3.7.1 The settlement of Ashurst Wood is environmentally constrained due to the settlement being washed over with the AONB. There is no remaining residual requirement from the District Plan for additional dwellings for the settlement. In reaching the overall requirement in the Local Plan DPD the Council (in its Sustainability Appraisal that accompanied the DPD), has had regard to the advice in the NPPF. The Council has examined the evidence to identify the point at which the adverse impacts would significantly and demonstrably outweigh the benefits, particularly when considering dwelling numbers to settlements constrained due to the AONB, which indicates that development in these locations should be restricted. In the accompanying Settlement Sustainability Review (May 2015), the Council concluded that future development in Ashurst Wood should be primarily to meet local needs. However, the SADPD proposes a site for 12 units. A balance needs to be struck to ensure the positive benefits (social/economic) of allocating a site within the AONB is not markedly outweighed by the negative impacts (particularly environmental). Great weight should be afforded to protecting the AONB and the scale and extent of development within these designated areas should be limited. (Para. 172 NPPF).

4.0 Sites omitted from the Draft Plan that justify being allocated for housing.

4.1 Land south of Edinburgh Way, East Grinstead

- 4.1.1 Rydon have an option over the land as identified in Appendix (A). The site SHELAA reference 598 was considered as suitable in the SHELAA stage 1 as suitable for 60 units, in the medium to long term. Following further detailed site assessment, through the Site Selection Paper 3, the site has subsequently been found to be unsuitable for allocation in the SA DPD. The assessment concluded that the site will have high impact on the AONB.
- 4.1.2 This site is located on the south eastern edge of East Grinstead, adjoining existing residential development that was built in the 1970s and 1980s. The site forms a small triangular parcel of open countryside comprising a single horse paddock which is contained by a tall hedgerow, tree and a post and rail/wire fence. The site is approximately 1.8 hectares in total.
- 4.1.3 The site is located to the east of Harwoods Lane which extends alongside the western site boundary and is defined by a hedgerow. The north and western boundary of the site also contains a line of mature trees. Harwoods Lane currently connects the site to residential development to the north. Beyond the boundary to the west and north of the site is residential development on Chesterton Close, Collingwood Close and Edinburgh Drive.
- 4.1.4 The site is located in the AONB, the land slopes generally southwards and the undulating topography together with the existing strong hedgerows, belts of trees and blocks of woodland in the immediate area surrounding the site provides enclosure and containment to views within the landscape.
- 4.1.5 The site has the potential to be delivered as a standalone site, subject to access or as part of the Great Harwoods Farm development that has been promoted by Thakeham Homes during previous District Plan consultations.
- 4.1.6 The Site Selection Paper 3 : Housing Sites October 2019, concludes that the site is not suitable for further consideration due to its location within the AONB. As such the site has not been assessed in the Sustainability Appraisal accompanying the Site Allocation DPD. 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", 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. Whilst constraints may apply, there is no reason why such constraints could not be overcome and addressed, as they have elsewhere, particularly if there is no other reasonable alternative.
- 4.1.7 Subject to appropriate mitigation, there are no constraints to development at the wider site, including Great Harwoods. The site is well contained within its surroundings and will therefore not result in an adverse landscape impact. The proposal by Thakeham

Homes 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.

- 4.1.8 East Grinstead is one of the three main towns in Mid Sussex and offers a range of services and facilities and a mainline railway station, all within a reasonable walking distance from the site, approximately 1 kilometre. As such, the development will be less car dependant than that at Imberhorne Lane to reach day today facilities and consequently less likely to impact on the problematic junctions along the A22. The SHELAA assesses the site as relatively unconstrained, development will not have a negative impact on the Conservation Area or Area of Townscape Character and it is not subject to the risk of flooding. It lies in the AONB but impact to the wider landscape can be mitigated. It has been identified as suitable in the SHELAA and therefore the site should be assessed in the SA and considered to be a reasonable alternative to meet housing need in the town.

4.2 Land south of Chalkers Lane, Hurstpierpoint

- 4.2.1 Rydon have an option over the land as identified on the enclosed plan. The site, SHELAA Ref. 575, was identified in the Council's SHELAA stage 1 as suitable for 200 units, in the medium to long term. Following further detailed site assessment through the Site Selection Paper 3, the site has subsequently been found to be unsuitable for allocations in the SA DPD. The assessment concluded that the site is 'large' and the proposals will result in harm to the Listed building of the college and harm to the special character of the Conservation Area.
- 4.2.2. The site has an area of 27 ha (67 acres) but a large proportion of this will be left undeveloped providing the strategic buffer of open land separating the development from Hurstpierpoint College and Hurst Wickham to the east. This land offers the opportunity to extend the area of Country Open Space which formed part of the package accompanying the delivery of the residential development that is now being carried out by Bovis and indeed Rydon's small development to the south. The capacity of the site taking account of these buffer areas would be 220/260 units based on 30/35 dpa. There is the potential for land ownership to be transferred to the Parish Council so that this mitigation will endure in the long term. There is potential to extend the Country Park.
- 4.2.3 The attached plan prepared by Richards Urban Design drawing 1263.02 shows the full extent of the land by red edging. Also attached is an Opportunities and Constraints plan drawing 1263.03 which shows how the above concept could be put into practice. The attached photographs on drawing 1263.01 will give some idea of the physical characteristics of the land concerned.
- 4.2.4 The opportunity to extend the Country Open Space Area needs to be taken into account in relation to this Assessment. The current Assessment of impact upon both Hurstpierpoint College and Hurst Wickham Conservation Area is classified as being less than substantial harm. With mitigation as described above there would be no material impact. The open space will preserve the countryside setting to

Hurstpierpoint College to the east and this is already despoiled by buildings and sports pitches within the grounds. Hurst Wickham Conservation Area is a considerable distance away and there will be no material impact. A High Level Heritage Setting Statement prepared by Orion Heritage Ltd is attached which assesses the impacts and confirms that they would be nugatory.

- 4.2.5. There are no landscape quality designations on the site or in the immediate vicinity. The National Park boundary lies some 3km away to the south and distant views towards the site encompass the whole of the existing settlement of Hurstpierpoint, with which this development would appear in context. There is also potential for provision of strategic landscape buffers to the east and south of the site as part of the sensitive design of the Country Park and this will provide mitigation. Whilst the countryside is not unattractive, it is certainly not special and the site is relatively flat, featureless and not prominent in the wider landscape.
- 4.2.6. Trees/TPOs – the existing trees are located within boundary hedgerows and will be retained and enhanced. A suitable buffer to small areas of adjoining ancient woodland will be incorporated within any layout. There will be extensive new tree planting as part of the strategic landscaping proposals described above. This is a positive scenario for trees and the assessment should reflect that.
- 4.2.7 This is a sustainable, deliverable and developable development opportunity which should be included as a site allocation to meet strategic housing needs across the District. The original SHELAA assessment was not fair or accurate in a number of ways. The latest, February 2020, Assessment which is included in the Site Selection paper 3: Housing Sites Update does not take account of the representations made by Rydon at the Regulation 18 Consultation stage. The representations explained how the Country Park could be extended to the east to protect the wider gap between Hurstpierpoint and Hurst Wickham and the setting of the Hurst Wickham Conservation Area and that land at the northern end of the site could be left open to protect the setting of Hurstpierpoint College. The land is believed to be Grade 3b and therefore is not best and most versatile. The SHELAA correctly concludes that the site accords with the overall development strategy but the Detailed Site Assessment has not fully taken into account the evidence base, which shows how matters of separation of settlements and setting of heritage assets can be suitably addressed whilst still providing a net developable area to provide up to 200 sustainably located dwellings in accordance with the development strategy. The site assessed is for 540 dwellings and this does not take account of the Rydon masterplan which shows a smaller net developable area (around 200 dwellings) together with extensive open space areas to ensure the separation of settlements and protect the setting of heritage assets. This site should be considered in the SA in this context and would prove to be a suitable candidate as one of the additional allocations required to be provided in the Plan.

**REGULATION 19 SUBMISSION DRAFT
SEPTEMBER 2020**

**LIST OF APPENDICES ACCOMPANYING REPRESENTATIONS
OF BEHALF OF RYDON HOMES LTD**

- APPENDIX A** - Land under control of Rydon Homes Ltd
 South of Edinburgh Way, East Grinstead
- APPENDIX B** - Little Park Farm, Hurstpierpoint
- 1263.01 – Site photos
- 1263.02 – Site Location and land under control of
 Rydon Homes Ltd
- 1263.03 – Opportunities and Constraints Plan
- High Level Heritage Setting Statement - Orion

APPENDIX A



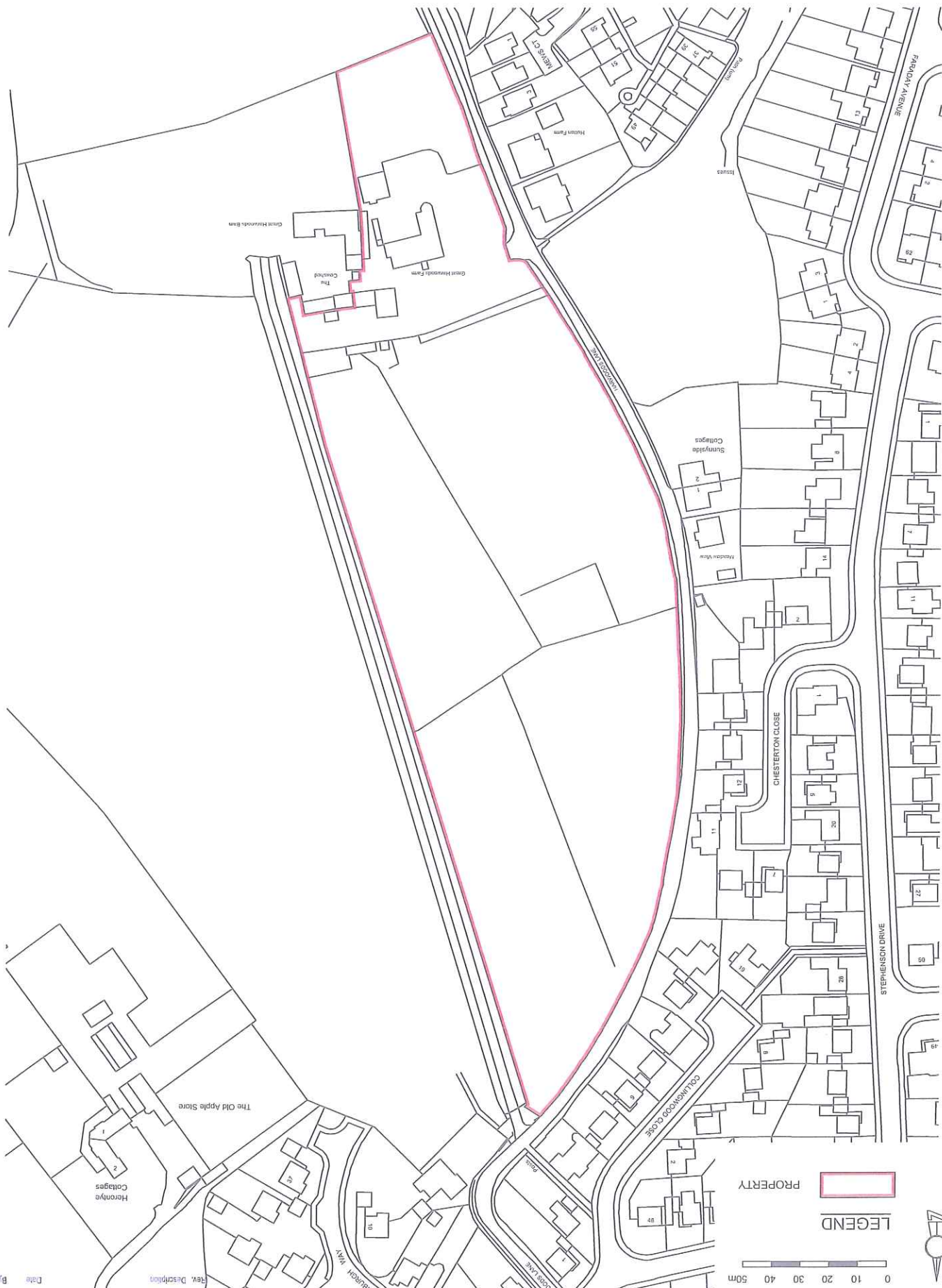
Rydon Homes Ltd
Rydon Homes
Station Road
Forest Row
East Sussex
RH18 5DW
T 01323 225151
E-mail: design@rydon.co.uk

Drawing No: 10597-L-01

Option Plan

Great Harwoods
East Grinstead

Date: October 2018
Drawn by: MMH
Scale: 1:1250 @ A3
Rev:

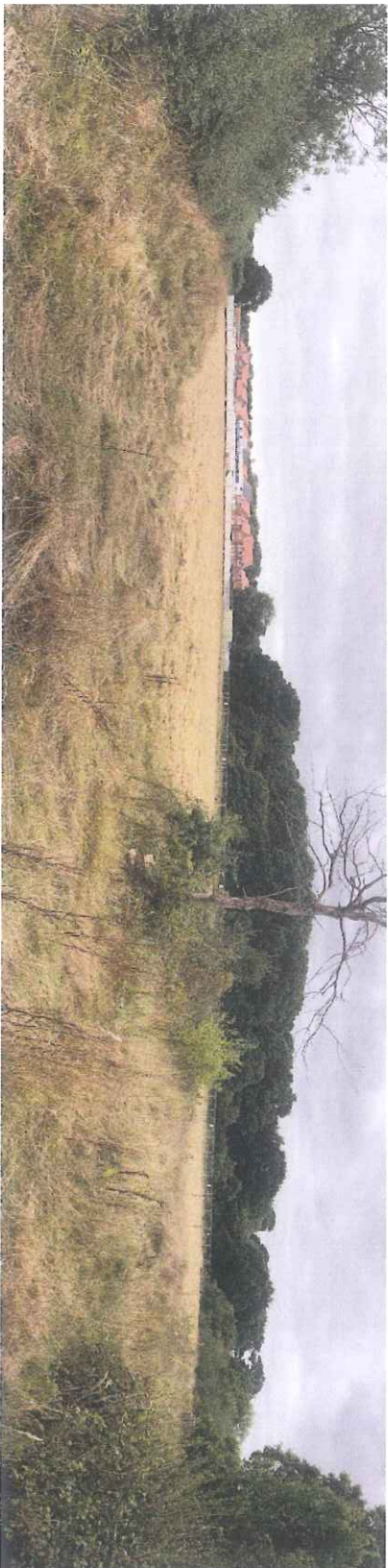


APPENDIX B

Total	
NIS	
Date	03.05.19
	standing at 1263.01



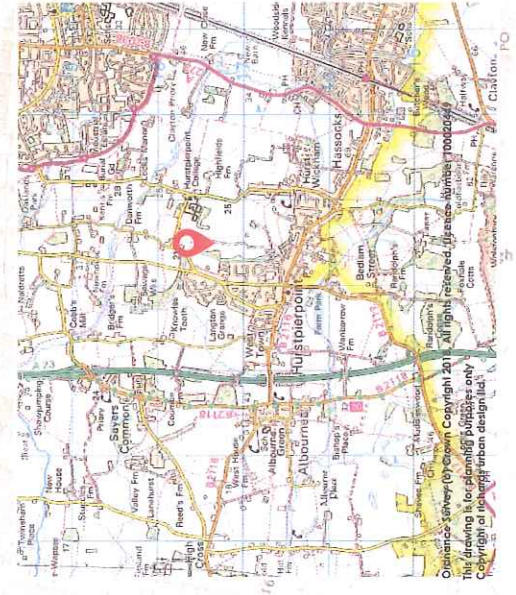
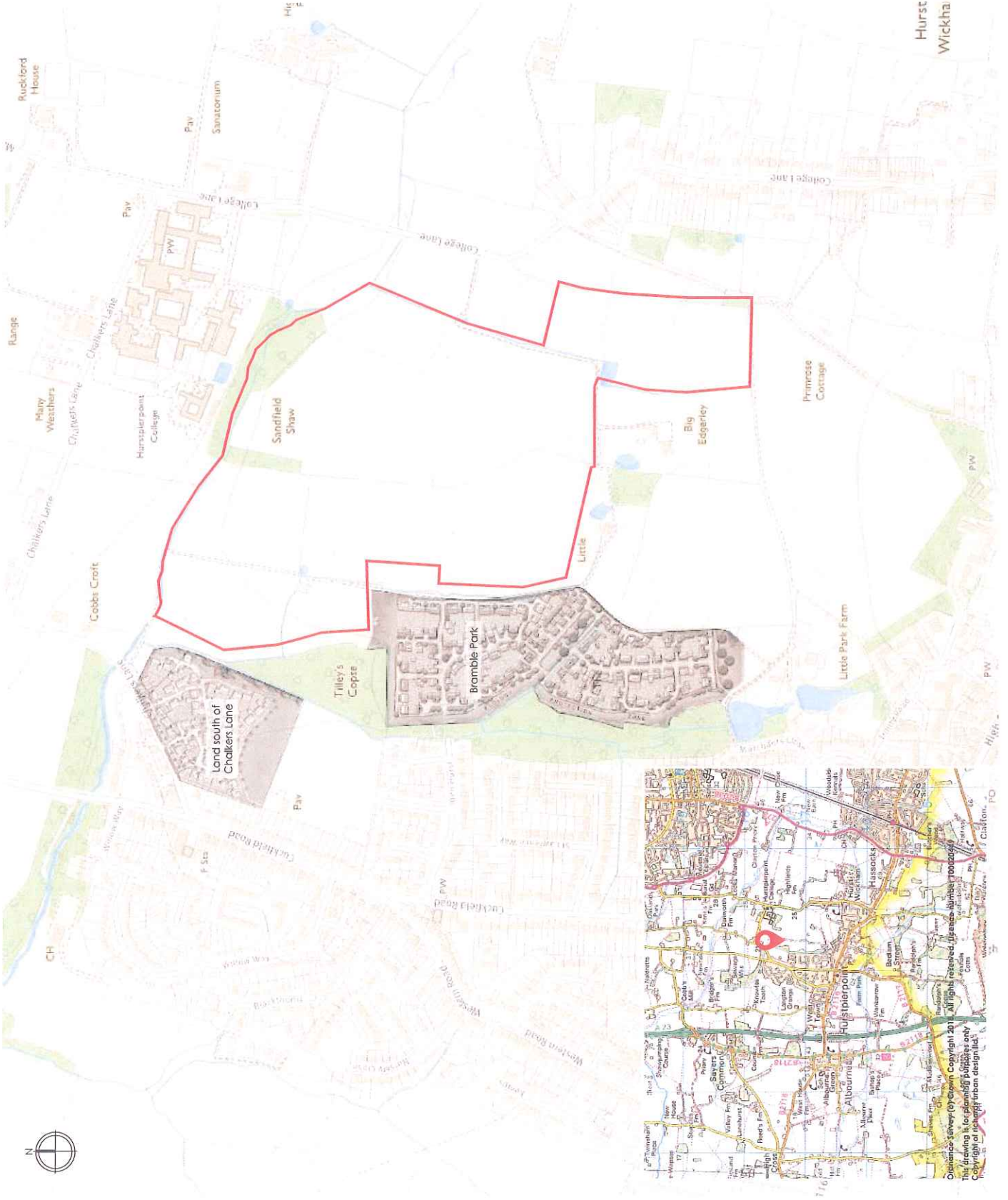
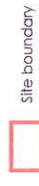
1. View looking north from the centre of the site with new housing south of Chalkers Lane on the left and Hurstpierp College on the right



2. View looking south east from the centre of the site with the new housing development at Bramble Park (left) and Tilley's Copse (right) in the background



3. View looking south with Bramble Park in the distance on the right.



LITTLE PARK FARM, HURSTPIERPONT

Drawing
Opportunities and constraints plan

Scale
NTS

Date
03.05.19

Drawing no
1263.03

KEY

Site boundary

Hurst Country Open Space

Existing Public Right of Way

Potential access to site

Contour

Existing mature tree/hedge boundaries enclosing land parcels to be retained, reinforced where appropriate & periodically traditionally lobl.

No development zone associated with Tiley's Copse to protect Ancient Woodland

Listed Building

Hurst Wickham Conservation Area

Potential extension to Hurst Country Space

Potential area for residential development

Potential new public open space / play area

Potential new looppath routes

Potential link to college

Potential children's play area

Low density landscaped edge

Potential location for SuDS drainage feature



Little Park Farm, Hurstpierpoint
High Level Heritage Setting Statement
May 2019

Little Park Farm, Hurstpierpoint
High Level Heritage Setting Statement
May 2019

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Report

Little Park Farm, Hurstpierpoint

Site

High Level Heritage Setting Statement

Client

Rydon Homes

Date

May 2019

Planning Authority

Mid-Sussex District Council

Prepared By

Rob Bourn BA MA MCIfA

Approved By

Dr Rob Smith MCIfA

Report Status

Final

Orion Ref

PN2213/1

1.0 Introduction

- 1.1** The purpose of this report is to present a high level assessment of the potential effect on the setting and significance designated heritage assets of residential development on land to the south west/south of Hurstpierpoint College. This is to support the promotion of residential housing in the western area of study site. It is not a full statement of significance report or a heritage statement.
- 1.2** The site is located to the south east of Chalkers Lane, to the east/north east of Bramble Park housing scheme that is currently under construction and to the south west/south of Hurstpierpoint College at grid ref at grid reference TQ 28529 17530 (Fig. 1).
- 1.3** The development of the study site has the potential to affect the settings and significance of two grade II listed buildings (Hurstpierpoint College and Star House at Hurstpierpoint College) and to the north west of the Hurst Wickham part of Hurstpierpoint Conservation Area (Fig. 2).

2.0 Planning Policy Framework

- 2.1** The Mid Sussex District Plan 2014 – 2031 contains two relevant policies relating to listed buildings and Conservation Areas.

DP34: Listed Buildings and Other Heritage Assets

Listed Buildings Development will be required to protect listed buildings and their settings. This will be achieved by ensuring that:

- *A thorough understanding of the significance of the listed building and its setting has been demonstrated. This will be proportionate to the importance of the building and potential impact of the proposal;*
- *Alterations or extensions to a listed building respect its historic form, scale, setting, significance and fabric. Proposals for the conversion or change of use of a listed building retain its significance and character whilst ensuring that the building remains in a viable use;*
- *Traditional building materials and construction techniques are normally used. The installation of uPVC windows and doors will not be acceptable;*
- *Satellite antennae, solar panels or other renewable energy installations are not sited in a prominent location, and where possible within the curtilage rather than on the building itself;*
- *Special regard is given to protecting the setting of a listed building;*
- *Where the historic fabric of a building may be affected by alterations or other proposals, the applicant is expected to fund the recording or exploratory opening up of historic fabric.*

Other Heritage Assets

Development that retains buildings which are not listed but are of architectural or historic merit, or which make a significant and positive contribution to the street scene will be permitted in preference to their demolition and redevelopment.

The Council will seek to conserve heritage assets in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the character and quality of life of the District. Significance can be defined as the special interest of a heritage asset, which may be archaeological, architectural, artistic or historic.

Proposals affecting such heritage assets will be considered in accordance with the policies in the National Planning Policy Framework (NPPF) and current Government guidance.

DP35: Conservation Areas

Development in a conservation area will be required to conserve or enhance its special character, appearance and the range of activities which contribute to it. This will be achieved by ensuring that:

- New buildings and extensions are sensitively designed to reflect the special characteristics of the area in terms of their scale, density, design and through the use of complementary materials;
- Open spaces, gardens, landscaping and boundary features that contribute to the special character of the area are protected. Any new landscaping or boundary features are designed to reflect that character;
- Traditional shop fronts that are a key feature of the conservation area are protected. Any alterations to shopfronts in a conservation area will only be permitted where they do not result in the loss of a traditional shopfront and the new design is sympathetic to the character of the existing building and street scene in which it is located;
- Existing buildings that contribute to the character of the conservation area are protected. Where demolition is permitted, the replacement buildings are of a design that reflects the special characteristics of the area;
- Activities such as markets, crafts or other activities which contribute to the special character and appearance of the conservation area are supported;
- New pavements, roads and other surfaces reflect the materials and scale of the existing streets and surfaces in the conservation area.

Development will also protect the setting of the conservation area and in particular views into and out of the area.

New buildings of outstanding or innovative design may be acceptable in conservation areas provided that their impact would not cause material harm to the area.

3.0 Designated Heritage Assets

Hurstpierpoint College (grade II List number 1194726)

- 3.1** The Hurstpierpoint College complex is located immediately to the north east of the study site (Fig. 2). The main college building is grade II listed. The listing describes it as follows:

St John's College, Hurstpierpoint, was the second school established by Nathaniel Woodard, founded in 1849. In 1850 it was established in The Mansion House Hurstpierpoint and in 1853 moved into its permanent buildings. These were designed by R.C. Carpenter but largely built after his death by his partner, William Slater, and his son, R.H. Carpenter. They are in Gothic style and built of flints with tiled roofs. They form 2 quadrangles, the southern one open on the south side, with narrow pointer or trefoil-headed ws. The chapel and Hall form the north side of the north quadrangle. The Chapel at the east end has 7 bays, 4 of them projecting beyond the east side of the quadrangle. Pointed w. of Decorated type flanked by buttresses. At the west end of the Chapel are short transepts which form an ante-chapel, lit by a larger similar w. and above a tower added in 1929. The interior has very beautiful intern stalls. To the west again is a small covered passage, also added in 1929 to join the Chapel to the Ball. the latter is on the first floor with the dining room beneath it. These have 5 bays flanked by buttresses. The ws. on the first floor have flatter pointed heads, those on the ground floor consist of pairs of trefoil-headed lancets.

- 3.2** The significance of the college resides in its architectural, historical and artistic (i.e. aesthetic) interest. It forms the both the main building and core of the college complex and has group value with the immediately adjacent Star House. The setting of

the listed college building will be considered in brief below along with Star House as they form part of the setting of each other and share the same setting.

Star House (grade II List Number 1025664)

- 3.3 Star House is located on the east side of the main college building fronting College Lane. The listing describes the building as follows:

Built in 1873 in matching style to the College and probably designed by R.H. Carpenter. Three storeys. Three windows. Faced with flints with stone dressings and quoins. Tiled roof. Two gables and gabled dormer between casement windows. Two bays on ground and first floors, each with 5 trefoil-headed lights. Wide porch between with 7 similar lights.

- 3.4 As with the college building, the significance of the house resides in its architectural, historical and artistic (i.e. aesthetic) interest. It has group value with the immediately adjacent listed college building. The setting of the Star House will be considered in brief below along with the main college building as they form part of the setting of each other and share the same setting.

Setting of Hurstpierpoint College & Star House

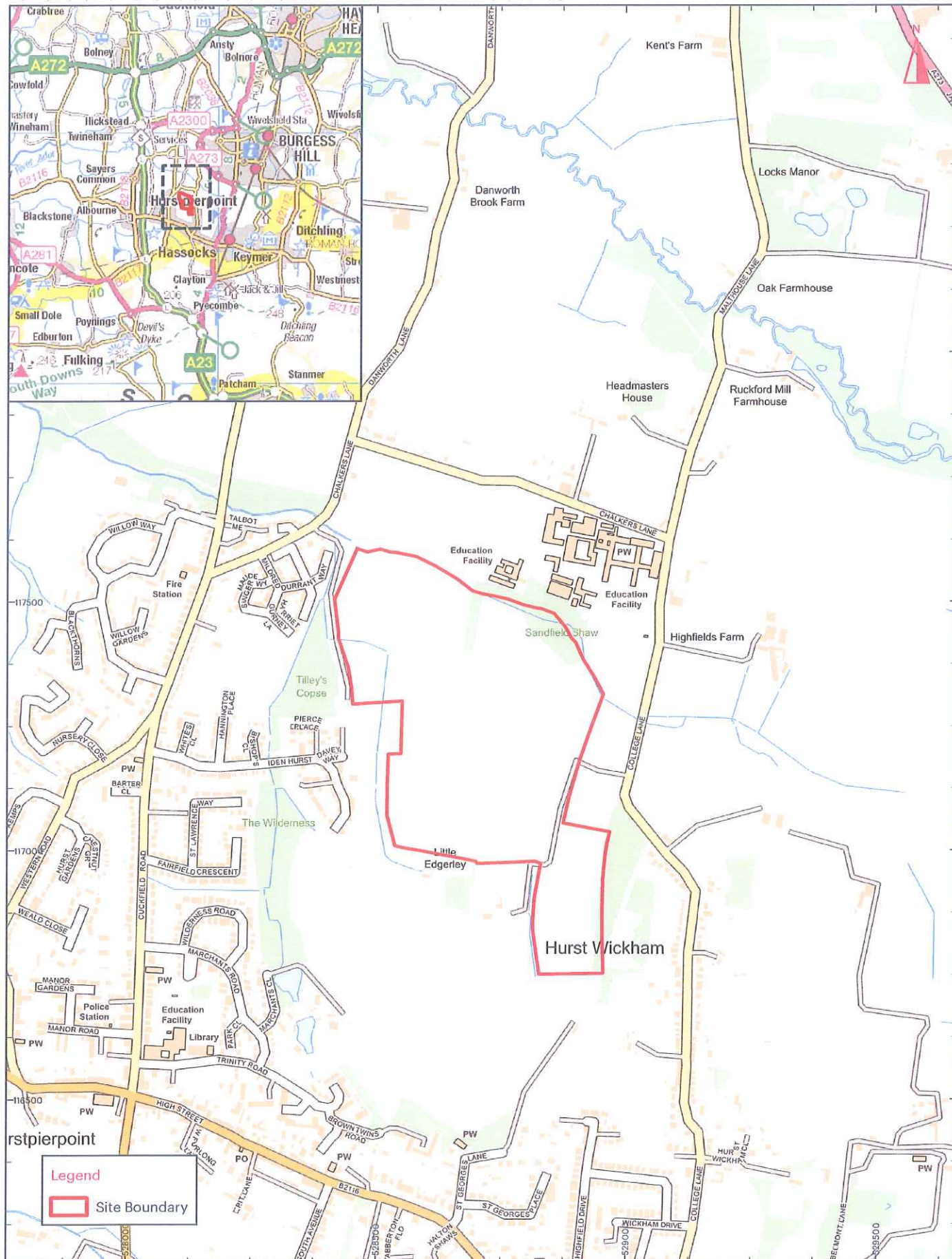
- 3.5 The two listed buildings occupy the main central and eastern area of the college complex. They dominate the grass sports pitches and facilities immediately to the north the buildings and the artificial grass sports pitches immediately to the south of the buildings. There are a series of pre-WWII, 1970s and later school buildings immediately to the west and south west of the main listed college building, with car parking and further artificial surface sports facilities to the west of the school buildings. It is within this area that the setting has a very strong positive contribution to the significance of the two listed buildings in functional, visual and historic terms. The later buildings, while not of the same architectural quality as the listed buildings, are sympathetic and subservient to the main building and the mix of style and date adds a very perceivable time depth to the experience of the school setting. The car parks and artificial sports pitches on the western side of the school complex contain a number of visually prominent lighting stands and fencing with a line of overhead electricity cables and wooden pylons cutting north south immediately to the west of the school grounds. The car parks, lighting stands, fencing and electricity cables detract from the experience of the listed buildings and have a slight negative contribution to their significance.
- 3.6 The College and Star House also have a wider landscape setting beyond the college complex. It is located on a relatively high spot on the landscape and so can be seen from and has at least partial views out over the lower land to the east and the south/south east. This aspect has a mildly positive contribution to the significance of the college as it places it within its wider rural context and enables it to be appreciated in various glimpsed and full views from within the wider area.
- 3.7 The setting to the west/south west of the school is more limited in extent and in its contribution to the significance of the main listed college building. The later school buildings block clear views in to and out from the listed buildings. The tower on the chapel can still be seen in many views due to its height but the main body of the listed buildings cannot be experienced, even at close quarters to the school boundaries, from the west and south west. Consequently, the land to the west/south west does not contribute visually to the significance of the college buildings. The land has historically been fields and so it does have a slight positive contribution to the historic interest significance of the listed buildings. The two new and under construction housing schemes (Land South of Chalkers Lane & Bramble Park) are recent visible changes within this aspect of the setting on the west side of the college which have introduced modern residential form.

Impact Assessment

- 3.8** The study site is being promoted for up to c. 260 residential units located in western and south western area of the site and a substantial area of open space. The layout on the constraints and opportunities plan (Fig. 3). The development parameters have been designed to preserve and enhance the setting of the college to the south west and west of the listed buildings. The layout has been designed to respond to the setting of the college and its contribution to the significance of the listed buildings. The main bulk of the proposed housing area will be screened from view from the college behind existing mature tall hedges and trees and so will have no effect on the setting of the college as they will not be experienced from the college and vice versa.
- 3.1** The north western field of the study site is currently a field which forms a small part of the wider rural context within which the college is experienced. This field is currently an arable field split into two by a north-south orientated footpath. The eastern 2/3 of the field will be retained as public open space with high quality housing in the area of the field to the west of the footpath. By bringing the edge of the built form c. 140m closer to the college complex than it currently is, there will be a slight visual change within this part of the setting. The recently constructed Chalkers Lane residential scheme has already introduced modern houses into this aspect of the setting. Consequently, the proposed high quality housing within this area of the study site will not change the character of the setting. The eastern half of the north western field of the site will be retained as public open space. This will ensure that the views of the tower of the college chapel that are currently possible from the site will be retained. There are no views of the site currently from the listed buildings anyway, as described above. Consequently, views from the listed buildings will be unaffected. The later school buildings to the west of the listed college buildings block all views of the site from within the core of the setting of the college. Therefore, the experience of the listed buildings as they are now, will be unaffected.
- 3.2** The area of the site to the south of college will be retained as an extension to the Hurst Country Space. This will ensure that the setting to the south of the college will be protected and conserved.
- 3.3** In conclusion, the development of the site as proposed in the illustrative concept masterplan, will result in the loss of about 1/3 of a field that has a slight contribution to the significance of the listed college buildings. This will primarily be a slight visual change. The college will still be separated from the edge of the built area of Hurstpierpoint by open space. The aspects of the setting of the college that have a clear and strong positive contribution to the significance of the listed buildings will be unaffected. Consequently, the development of the study along the parameters as outlined in the constraints and opportunities plan (Fig. 3) will not result in harm to the significance of Hurstpierpoint College or Star House.

Hurst Wickham Conservation Area

- 3.4** The area of the proposed housing is considered to lie beyond the setting of all three blocks of the Hurstpierpoint Conservation Area. There is one vista point identified on the significant views map of the Hurstpierpoint Conservation Area from just north of St Georges Lane that is toward the study site. However, the proposed developable area of the site is 0.5km to the north and is screened from the view by intervening hedges, trees and other vegetation. Consequently, there will be no effects on this view. The southern part of the proposed potential extension Country Space would be within this view but there will be no effect on this view. Consequently, the development of the study along the parameters as outlined in the illustrative masterplan will not result in harm to the significance of any of the three blocks of Hurstpierpoint Conservation Area.



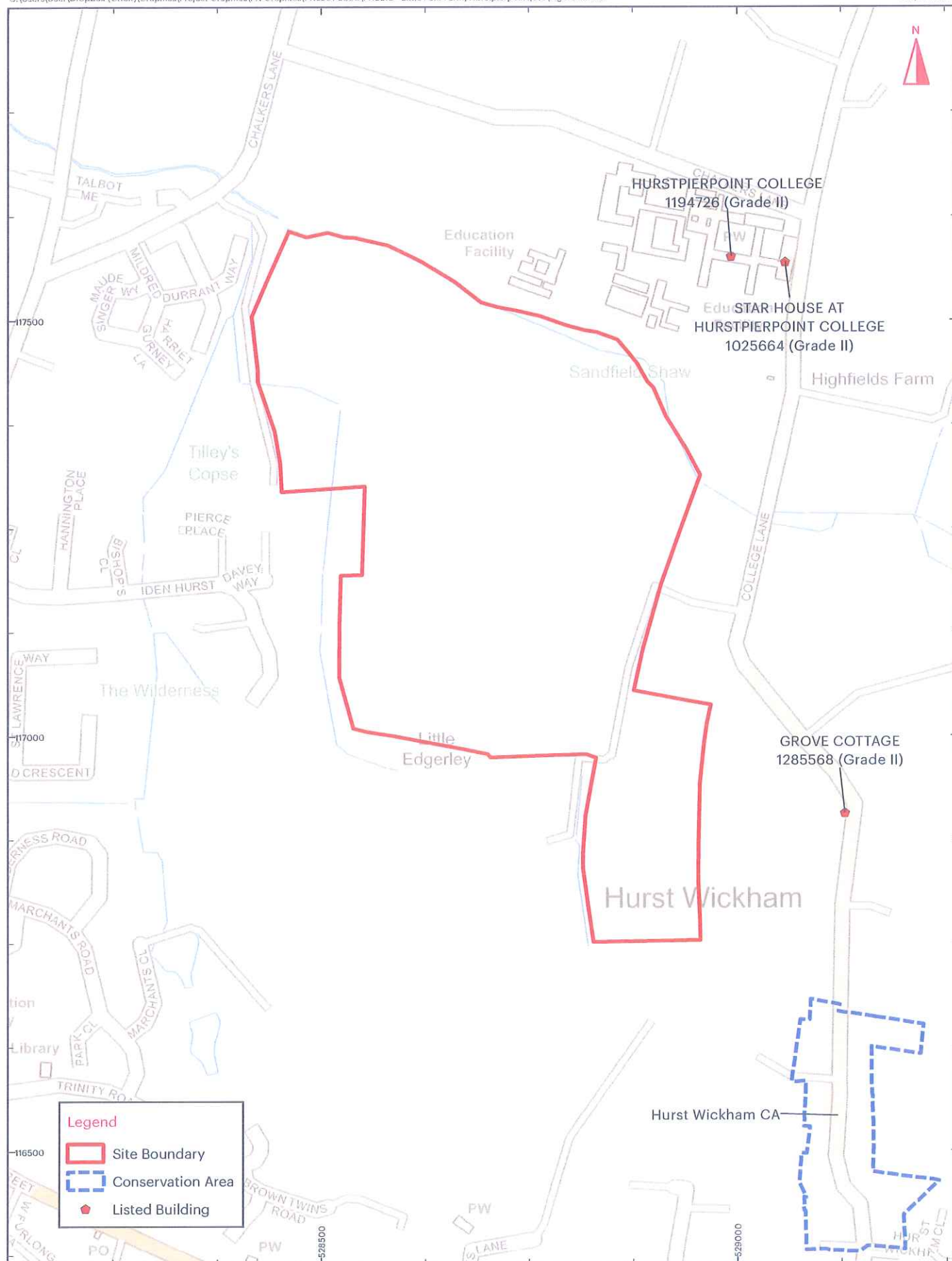
**Title:**

Figure 2: Location of Designated Assets

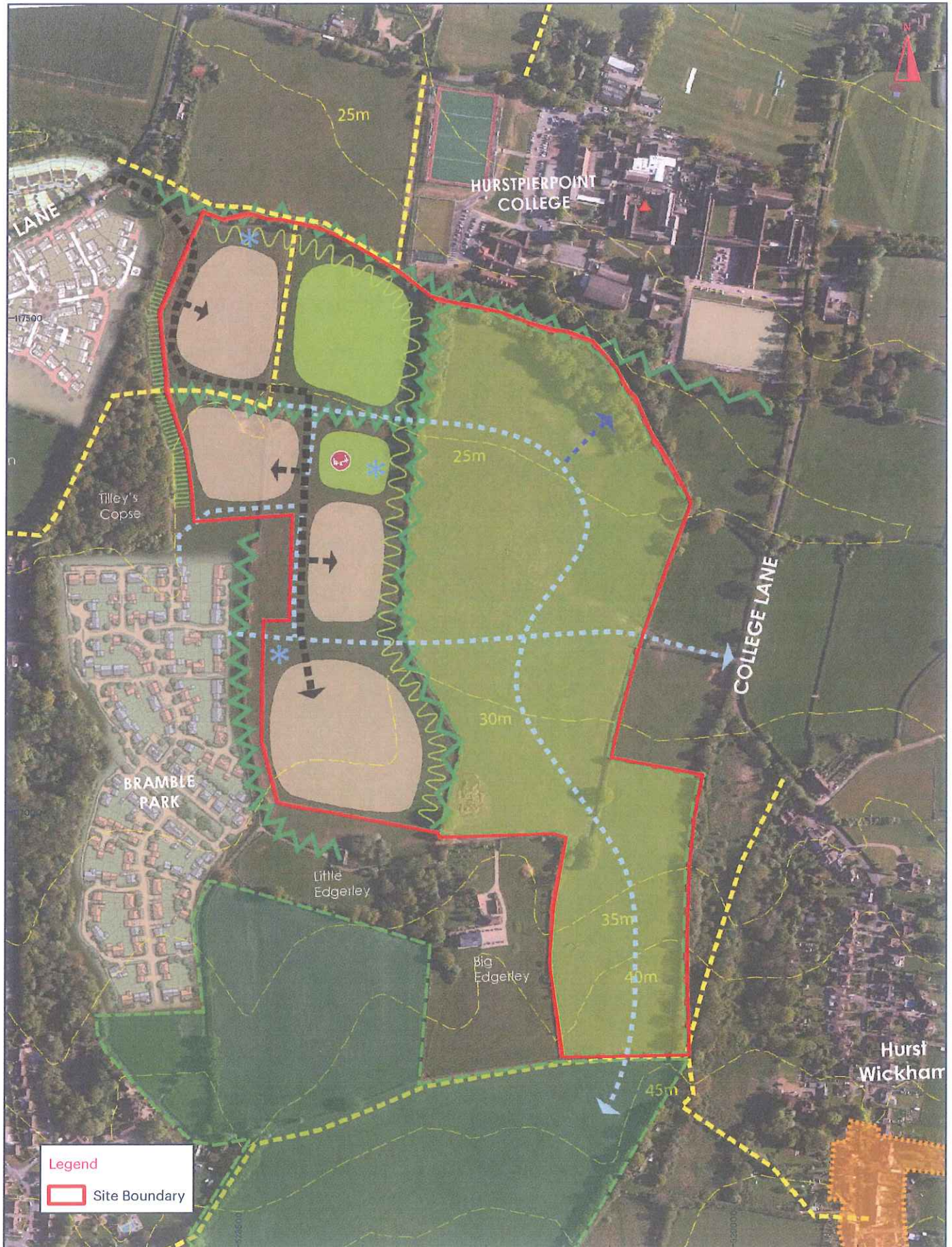
Address:

Little Park Farm, Hurstpierpoint

Scale at A4: 1:6,000

0 180m

orion.



Title:
Figure 3: Opportunities and constraints plan
Address:
Little Park Farm, Hurstpierpoint

Scale at A4: 1:5,000



orion.

2165

Site Allocations DPD: Regulation 19 Consultation Response

Policy: SA18

ID: 2165

Response Ref: Reg19/2165/1

Respondent: Mrs & Mr J & J Hayler

Organisation:

On Behalf Of:

Category: Resident

Appear at Examination? x

[REDACTED]

From: JudyF Hayler [REDACTED]
Sent: 28 September 2020 21:06
To: ldfconsultation
Subject: Consultations SA20, SA19, SA18 & SA22
Attachments: Mid sussex planning officer 28Sept2020.doc

Categories: SiteDPD, [REDACTED]

[REDACTED]
[REDACTED]
[REDACTED]
28th September 2020

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

Re: Consultations on Proposals SA20, SA19, SA18 & SA22 – East Grinstead, Felbridge and Crawley Down

Dear Sirs

We wish to register our objection to the above proposals - for the building of 500 houses on Imberhorne Farm, 200 houses in Felbridge, development of housing at East Court at the former East Grinstead police station and 50 houses on farmland on the southern edge of Crawley Down - for the following reasons:

There has been a failure to consult the local community. Most local residents have only been made aware of this consultation following local posters attached to trees adjacent to the areas concerned, on the local footpaths and bridleways.

Development of housing of this magnitude within the locality to East Grinstead will have a major impact on the local infrastructure, roads, schools and health provision. It is already challenging to get registered with a GP in East Grinstead as their list are regularly closed due to capacity. The A22 and A264 are roads with major congestion due to the amount of local and through traffic. We believe this proposal is contrary to the neighbourhood plan.

As a frequent user of the Worth Way and connecting bridleways and footpaths between East Grinstead, Felbridge and Crawley Down, we know these areas well. These proposals will have an unacceptable impact on the area. Since the lockdown in March the usage of these areas by local walkers, runners, cyclists and horse riders has increased substantially. We need areas of open land between East Grinstead and the nearby villages more than there is a demand for

housing. The area has diverse flora and fauna which will be directly impacted and this area is very close to the 7km zone of influence of Ashdown Forest.

Please consider this letter as an objection to this consultation and we call on the council to reject the proposals.

Yours sincerely

Judy F Hayler

John D Hayler