Felbridge Standard Form	- Index by ID Number			
ID Respondent	Organisation	BehalfOf	Respondent Category	Participate
272 Mr P Murray			Resident	
619 Mr M Wiles			Resident	
1374 Mrs T Nelson			Resident	
1394 Mr C Vernon	Gander & White		Organisation	
1433 Mr R King			Resident	
1506 Mr M Reuter			Resident	
1508 Dr M Davidson			Resident	
1509 Ms Q G Laycy Qorons			Resident	
1511 Mrs B King			Resident	
1512 Mr and Mrs Dewitt			Resident	
1513 Ms P Murfet			Resident	
1514 Mr P D Cubberley			Resident	
1515 Mr V Amin			Resident	
1516 Ms H Robertson			Resident	
1517 Mr T Leppard			Resident	
1518 Ms S Smith			Resident	
1519 Mr D Murfet			Resident	
1520 Mr B Kelly			Resident	
1521 MR J Sherwin-Smith			Resident	
1522 MR D Whiley			Resident	
1523 Mr S Murphy			Resident	
1524 Ms J Weller			Resident	
1525 Ms G Scholes			Resident	
1526 MS J Hill			Resident	
1527 Mr Jon Nightingall			Resident	
1528 Mr J Bowers			Resident	
1529 Mrs J Bowers			Resident	
1530 Mr P Bowers			Resident	
1532 Ms R Smith			Resident	
1540 Mr R Harreiter			Resident	
1541 Mr S Rogers			Resident	
1552 Mr B Noldart			Resident	
1554 Mr G Wilbrew			Resident	
1555 Mr V Low-Foon			Resident	
1556 Ms S Galloway			Resident	
1559 Mr T Brown			Resident	
1564 Mr E Waller			Resident	
1565 Mr G Mills			Resident	
1586 MR C Brewer	Felbridge Bowling Club		Organisation	

ID	Respondent	Organisation	BehalfOf	Respondent Category	Participate
1588	Ms C Pavey			Resident	
1589	Mr K Andrews			Resident	
1590	Mr C Shirley			Resident	
1591	Mr C Jones			Resident	
1592	Mr J Sisley			Resident	
1593	Ms V Shirley			Resident	
1594	Ms S Gibson			Resident	
1595	Mr S Weller			Resident	
1596	Mr P Lockwood			Resident	
1597	Mrs G Broadley			Resident	
1599	Ms S Wraight			Resident	
1600	Mrs E Richardson			Resident	
1601	. Ms D Lloyd			Resident	
1602	Mr A Matthews			Resident	
1603	Mr L Crockett			Resident	
1604	Mr H Powell			Resident	
1605	Mr & Mrs A Fox			Resident	
1608	Mr J Hogan			Resident	
1610	Mrs R Hogan			Resident	
1611	Mrs P Smylie			Resident	
1612	Mr A Nelson			Resident	
1613	Mrs B Foulds			Resident	
1614	Mrs M Smylie-Page			Resident	
1615	Mrs K Bradstock			Resident	
1620	Mrs A Barter			Resident	
1621	Mrs J Doherty			Resident	
1622	Mrs J Adams			Resident	
1623	Mrs L Bracey			Resident	
1631	Mrs C Jones			Resident	
1633	Mr S Munt			Resident	
1637	' Mr I Kelly			Resident	
1646	Mrs S Bennett			Resident	
1647	' Mr R Graham			Resident	
1648	Ms J Hill			Resident	
1649	Mr & Mrs Millard			Resident	
1651	. Mr R Foruria			Resident	
1652	Ms J Foruria			Resident	
1653	P Blakemore			Resident	
1657	' Ms J Potts			Resident	
1659	Mr J Wraight			Resident	

ID	Respondent	Organisation	BehalfOf	Respondent Category	Participate
1661	Ms S Lockwood			Resident	
1666	Mr P Wakeling			Resident	
1667	' Ms J Wakeling			Resident	
1668	B Ms C Budgen			Resident	
1669	Mr & Mrs Pavier			Resident	
1675	Mrs R White			Resident	
1676	Mr D Brown			Resident	
1679	Mr J Clay			Resident	
1680) Mr D Holmes			Resident	
1684	Mr T Tenney			Resident	
1685	Mr and Mrs A+R Mallinson			Resident	
1686	Mr and Mrs D+S Stow			Resident	
1696	6 Mr K Law			Resident	
1697	' Mrs J Jason			Resident	
1698	B Mr A Murrell			Resident	
1699	Mr J Letchford			Resident	
1700) Mrs P Letchford			Resident	
1708	B Mr T Pattenden			Resident	
1709	Ms K Fuller			Resident	
1710	Mrs C Kettlewell			Resident	
1712	Mr D Pattenden			Resident	
1713	Mr R Slatter			Resident	
1714	Mr P O'Dell			Resident	
1719	Mr S Mustard			Resident	
1721	Miss K McPherson			Resident	
1725	Mr N Lea			Resident	
1728	8 Mr C Webb			Resident	
1729	Mr M J Mc Carthy			Resident	
1731	. Ms D Lea			Resident	
1733	Mr and Mrs JM Parkes			Resident	
1734	Ms C Graham			Resident	
1737	′ Ms J Winter			Resident	
1738	B Mr M Corby			Resident	
1739	Ms M Scanlan			Resident	
1740) Mr P Turner			Resident	
1741	. Ms N Taylor			Resident	
1743	B Ms L Kelly			Resident	
1745	Mr P Bennett			Resident	
1746	6 Mr a Sutton			Resident	
1748	8 Mr A Jones			Resident	

ID	Respondent	Organisation	BehalfOf	Respondent Category	Participate
1749) Mr J Donovan			Resident	
1750	Mr R Hutton			Resident	
1752	Mrs C Fox			Resident	
1753	Mr C Cox			Resident	
1755	Mr D Gayler			Resident	
1756	Mr A Scott			Resident	
1757	' Mr P McEneaney			Resident	
1758	B Mr M Scanlan			Resident	
1759	Mr P Breslaw			Resident	
1760) Ms A Walker			Resident	
1761	. Mr and Mrs L+E Musetti			Resident	
1762	Ms B Bird			Resident	
1763	Mr D Pinnegar			Resident	
1765	Mr D Walker			Resident	
1766	Mrs D Mead			Resident	
1767	/ Mr R Mead			Resident	
1768	Mr S Allingham			Resident	
1769	Ms S Bornati-Jones			Resident	
1770) Mr J Parry			Resident	
1771	. Ms J Hamlin			Resident	
1772	Ms H Thompson			Resident	
1774	Ms K Hofmann			Resident	
1775	Ms K Hatton			Resident	
1776	Mr S Dyer			Resident	
1780) Mrs P Hocking			Resident	
1782	Mrs C Munt			Resident	
1784	Mr M Fox			Resident	
1785	Mr & Mrs J & A Lockyer			Resident	
1786	Mrs J Fox			Resident	
1787	' Mr D Leppard			Resident	
1788	B Mrs A Munt			Resident	
1789	Mrs J Wells			Resident	
1790) Mr K Bird			Resident	
1795	Mr & Mrs J & R Chamberlain			Resident	
1796	o Mrs Tanya Gatehouse			Resident	
1798	8 Mrs C Dell			Resident	
1800) Mr D Lane			Resident	
1802	2 Mr J Ablett			Resident	
1803	8 Mr J Clarke			Resident	
1804	Mr A Akery			Resident	

ID	Respondent	Organisation	BehalfOf	Respondent Category	Participate
1806	Mrs S Clarke			Resident	
1807	Ms J Spiers			Resident	
1812	Mr R Fuller			Resident	
1814	Mr M King			Resident	
1815	Mrs V King			Resident	
1816	Ms S Celani			Resident	
1818	Mr J Carter			Resident	
1819	Mr C Whitcroft			Resident	
1820	Mr A Butcher			Resident	
1824	Mr O Thompson			Resident	
1825	Mr R Mawby			Resident	
1826	Mr G Williams			Resident	
1827	Mrs N Garner			Resident	
1828	Mr B Garner			Resident	
1829	Ms T O'Brien			Resident	
1831	Ms G Lewis			Resident	
1832	Mr J Jenkins			Resident	
1834	Mrs H Chand			Resident	
1835	Mrs S Yule			Resident	
1836	Ms L Davidson			Resident	
1838	Mrs G Crawford			Resident	
1839	Mr Les Thorpe			Resident	
1840	Mr C Weller			Resident	
1848	Mr G Stuart			Resident	
1849	Mr & Mrs B & C Piper			Resident	
1852	Ms P McComb			Resident	
1855	Mr A Alfred			Resident	
1856	Mr L Day			Resident	
1858	Mr G O'Sullivan			Resident	
1859	Mrs O'Sullivan			Resident	
1860	Mr M Crayfourd			Resident	
	Ms M Cox			Resident	
	Ms S Stone			Resident	
	Mr + Mrs M Siwicki			Resident	
	Ms G Davidson			Resident	
	Mrs E Siwicki			Resident	
	Mr J Davidson			Resident	
	Ms K Bunting			Resident	
	S Batchelor			Resident	
1872	Ms M Comber			Resident	

ID	Respondent	Organisation	BehalfOf	Respondent Category	Participate
1873	Ms J Breslaw			Resident	
1874	Mr J Calvert			Resident	
1875	Ms G Burke			Resident	
1876	Mr V Burke			Resident	
1877	Mr A Jordan			Resident	
1878	Mr E Charter			Resident	
1881	Mr P Holley			Resident	
1883	Mrs M Downes			Resident	
1884	Ms V Mustard			Resident	
1885	Mrs V Bowes			Resident	
1889	Ms A Visagie Fox			Resident	
1890	Ms A Penny			Resident	
1891	Mr J Gray			Resident	
1892	Ms D Friel			Resident	
1893	Mr P Roper			Resident	
1894	Mrs A Shoubridge			Resident	
1896	Ms E Vosper			Resident	
1897	M, B & H Ransom			Resident	
1899	Mr I Crothall			Resident	
1900	Mr G Groves			Resident	
1901	Mr A Busby			Resident	
1903	Ms J Thorburn			Resident	
1904	Ms T Chapman			Resident	
1905	Mr R Thorburn			Resident	
1908	Mr D P Hargreaves			Resident	
1909	Mrs A Hargreaves			Resident	
1916	Mr A Doherty			Resident	
1921	Mr M Pitman			Resident	
1923	Mrs E Gooden			Resident	
1924	Mr C Brunsdon			Resident	
1926	Mrs P Payne			Resident	
	Ms N Slatter			Resident	
	Ms S Hall			Resident	
	Mr a Harvey			Resident	
	Mr R Clark			Resident	
	Mr W Whales			Resident	
	Mr & Mrs P & S Barwell			Resident	
	Ms C Gilbert			Resident	
	Ms V Osborne			Resident	
1939	Ms E Ghost			Resident	

ID	Respondent	Organisation	BehalfOf	Respondent Category	Participate
1940	Mrs I Picton			Resident	
1941	Ms E Nightingall			Resident	
1942	Mr D Dykes			Resident	
1943	Ms L Mundy			Resident	
1944	Mr K Pond			Resident	
1945	Mr James Nightingall			Resident	
1947	Mr P & M Coombs			Resident	
1949	Mrs F Ablett			Resident	
1951	Mrs M Lightburn			Resident	
1952	Mr D Blacker			Resident	
1953	Mrs E Jordan			Resident	
1954	Mrs H Goodwin			Resident	
1955	Mr M Blacker			Resident	
1957	Mrs A Blacker			Resident	
1958	Mr H Lacey			Resident	
1959	Mrs D Blacker			Resident	
1961	Mr A Cubberley			Resident	
1964	Ms S Haycock-West			Resident	
1969	Ms S Latham			Resident	
1970	Mr S Goodwin			Resident	
1973	Mrs C Weir			Resident	
1974	Mrs A O'Doherty			Resident	
1975	Mr D Tilbury			Resident	
1980	Mrs Y Habkirk			Resident	
1982	Mr P Jackson			Resident	
1983	Mrs H Soale			Resident	
1984	Ms T Collis			Resident	
1986	Mr Nigel Fish			Resident	
	Mrs C Vernon			Resident	
1990	Mr S Hill			Resident	
	Mr M Saunders			Resident	
	Mrs T O'Donovan			Resident	
	Mr C Morris			Resident	
	Mrs N Boyd			Resident	
	Mr R Gibbs			Resident	
	Mrs S Cole			Resident	
	Mr D Cude			Resident	
	Mr J Fox			Resident	
	Mr & Mrs H & J Webber			Resident	
2003	Mrs H Parry			Resident	

ID	Respondent	Organisation	BehalfOf	Respondent Category	Participate
2004	Mr M French			Resident	
2006	Mr C Bkack			Resident	
2007	Mr M French		Oak Farm Place Ltd	Organisation	
2008	Mrs Y French			Resident	
2009	Mr A Fenwick			Resident	
2010	Mrs Fenwick			Resident	
2011	Mr J Morten			Resident	
2014	Ms H Ahearne			Resident	
2015	Ms J Menzies			Resident	
2017	Ms N Bennet			Resident	
2020	Ms E Manning			Resident	
2022	Ms R Warburton			Resident	
2025	Mr B Bartlett			Resident	
2026	Mr A Gardner			Resident	
2027	Mr T Baulch			Resident	
2028	Mr I Menzies			Resident	
2032	Ms A Ardron			Resident	
2034	Mr J Wells			Resident	
2035	Ms I Maclean			Resident	
2036	Mr S Billings			Resident	
2038	Mr S Melody			Resident	
2039	Ms L Billings			Resident	
2043	Ms C Johnston			Resident	
2044	Mr I Maudsley			Resident	
2045	Mrs V Barrett			Resident	
2046	Mr E Kolkin			Resident	
2047	Mr S Cox			Resident	
2050	A Sawyer			Resident	
2052	Mrs J Brown			Resident	
2053	Mr J Fragola			Resident	
2055	Mrs C Brown			Resident	
2056	Mr A Brooks			Resident	
2061	Ms T Baker			Resident	
2063	Mrs J Cude			Resident	
2066	Mr M Parker			Resident	
2070	Mr P Trufitt			Resident	
2071	Mr M Sambridge			Resident	
2072	Mrs M Sambridge			Resident	
2073	Mrs T Billings			Resident	
2074	Mr K Shakespeare			Resident	

ID	Respondent	Organisation	BehalfOf	Respondent Category	Participate
2075	Mrs M Shakespeare			Resident	
2081	A Marsden			Resident	
2084	S Farr			Resident	
2085	Mr R Colwill			Resident	
2087	Mr A Brown			Resident	
2088	Mr R Fendick			Resident	
2090	Mr R Graves			Resident	
2091	Mrs J Clark			Resident	
2094	Ms V Graves			Resident	
2097	A Hall			Resident	
2099	Mr & Mrs Waran			Resident	
2100	Ms S Cooper			Resident	
2101	Mrs S Mattock			Resident	
2102	Mr J Knott			Resident	
2103	Mr D Mackie			Resident	
2105	Mr A Mitchell			Resident	
2109	Mrs E Parker			Resident	
2110	Mr N Hocking			Resident	
2114	Ms K Salter			Resident	
2116	Ms C Fish			Resident	
2117	Mrs V Paisey			Resident	
2119	Mr B Treadaway			Resident	
2120	Mr K Lanaway			Resident	
2121	Mrs C Marsden			Resident	
2122	Mr T O'Neill			Resident	
2123	Ms K Cooper			Resident	
2124	Ms K Tomkins			Resident	
2127	Ms R Mundy			Resident	
2129	Ms S Brookes			Resident	
2130	Ms V Murphy			Resident	
2131	Mr M House			Resident	
2133	Mr S Ackroyd			Resident	
2134	Ms C Hazell			Resident	
2135	Mr N Jenkinson			Resident	
2136	Mr C Eaton			Resident	
2137	Ms N Fordrey			Resident	
2138	Mr & Mrs Britton			Resident	
2139	Mr N Horrigan			Resident	
2144	Mr and Mrs Black			Resident	
2146	Ms M Waters			Resident	

ID	Respondent	Organisation	BehalfOf	Respondent Category	Participate
2148	B Mr J Waters			Resident	
2149	Mr & Mrs James			Resident	
2150) Mrs J Denman			Resident	
2151	Mr A Risby			Resident	
2153	Mr C Denman			Resident	
2154	Mr M Winter			Resident	
2155	Ms L O'Neill			Resident	
2156	Ms K Pittingale			Resident	
2158	Mr P Puttock			Resident	
2159	Mr J Runc			Resident	
2161	Mr J Ryan			Resident	
2162	Mr & Mrs C & M Balaam			Resident	
2166	6 Mr D Lane			Resident	
2167	' Mr JW Farmer			Resident	
2168	8 Mr W Holmes			Resident	
2169	Mr O Cubberley			Resident	
2170) Ms H Tomkins			Resident	
2172	A Holley			Resident	
2173	Mrs S Heywood			Resident	
2175	Mr G Marshall			Resident	
2176	Mrs C Latter			Resident	
2177	' Mrs S Corrigan-Margetts			Resident	
2178	Mrs C Cubberley			Resident	
2180	Mr R Tomkins			Resident	
2181	. Mrs F Holman			Resident	
2182	Mrs H Brunsdon			Resident	
2183	Mr J Fordrey			Resident	
2187	' Mr A Slack			Resident	
2188	Mrs A Slack			Resident	
2189	Mr & Mrs A & F Falshaw			Resident	
2190) Mr & Mrs J & C Bagshawe			Resident	
2191	. Mr and Mrs J Mansell			Resident	
2192	Mrs A Roberts			Resident	
2195	Mr & Mrs M & C Stafford			Resident	
2197	' Mr T Tonge			Resident	
2198	8 Mr M Byrne			Resident	
2199	Ms E Brunsdon			Resident	
2202	Mrs K Bowen			Resident	
2203	Mrs D Ackroyd			Resident	
2206	Mrs A Heller			Resident	

ID	Respondent	Organisation	BehalfOf	Respondent Category	Participate
2207	Mr S Brown			Resident	
2208	MR T Parsons			Resident	
2210	Mr A Haycock-West			Resident	
2214	Ms L Morten			Resident	
2216	Mr C Gregory			Resident	
2219	Mr J Brown			Resident	
2220	Mr P Hedger			Resident	
2221	Ms C Lorimer			Resident	
2224	Ms J Gigney			Resident	
2225	Mr A Willis			Resident	
2226	Ms H Lewarne			Resident	
2228	Mr and Mrs R+F Middleton			Resident	
2229	Mr J Hugget			Resident	
2230	Ms V Howe			Resident	
2234	Mr R Barnby			Resident	
2235	Mr D Mayo			Resident	
2236	Mr D Kallmann			Resident	
2237	Ms E Johnston			Resident	
2238	Mr & Mrs Matthews			Resident	
2240	Mr G Copnall			Resident	
2242				Resident	
2243	Mr J Jennings			Resident	
2245	Mrs P Jennings			Resident	
2246	Ms S Worsfold			Resident	
2247	Mr D Billings			Resident	
2251	Mr K Turner			Resident	
2252	Ms P Nelson			Resident	
2255	Ms C Petitt			Resident	
2256	Ms L Fish			Resident	
2257	Ms A Turner			Resident	
2259	Mr O Little			Resident	
2260	Mr M Fish			Resident	
2262	Ms S Dean			Resident	
2263	Ms E Brooks			Resident	
2264	Mr and Mrs P & L Robinson			Resident	
2265	Mr D Barfield			Resident	
2266	C Batchelor			Resident	
2267	Mr P Treadaway			Resident	
2269	Ms S Ryan			Resident	

ID	Respondent	Organisation	BehalfOf	Respondent Category	Participate
2271	Ms F Haywood			Resident	
2274	Mr C Hillyer			Resident	
2275	Mr L Munt			Resident	
2276	Mrs J O'Sullivan			Resident	
2278	Mr M Heller			Resident	
2279	Mr P O'Sullivan			Resident	
2282	Mr G Keetley			Resident	
2283	Mr M Dean			Resident	
2289	Mr & Mrs S & P Burley			Resident	
2291	Mrs A Madgwick			Resident	
2292	Mr J Lambert			Resident	
2293	Mrs A Larkin			Resident	
2294	Mr & Mrs J & S Dillingham			Resident	
2295	Mrs H Byrne			Resident	
2296	Ms S Johnson			Resident	
2297	Mrs J Kenyon			Resident	
2298	Mr John Taylor			Resident	
2300	Ms A Gaisburgh-Watkyn			Resident	
2301	Mrs T Wiles			Resident	
2302	Mr B Weston			Resident	
2303	Mr A Watson			Resident	
2304	Mr S Ashby			Resident	
2308	Ms J Smith			Resident	
2309	Mr J Charman			Resident	
2310	Mr A McMillan			Resident	
2311	Mr R Bond			Resident	
2313	Mr D Bunting			Resident	
2314	Mr J Graves			Resident	
2316	Ms A Graves			Resident	
2319	Ms J Mason			Resident	
2320	Mr G Walding			Resident	
2321	Mrs J Walding			Resident	
2324	T Oliver-Reynolds			Resident	
2325	Mrs J Taylor			Resident	
2326	Mrs K Fryer			Resident	
2327	Mr M Fryer			Resident	
2328	Ms C Hargreaves			Resident	
2330	Mr N Gardiner			Resident	
2331	Mr R Winter			Resident	
2332	Ms B Snape			Resident	

ID	Respondent	Organisation	BehalfOf	Respondent Category	Participate
2333	Ms H Carter			Resident	
2334	Ms B Thurlow			Resident	
2335	Mr & Mrs Meek			Resident	
2338	Dr C Winter			Resident	
2339	Mr C Pickard			Resident	
2343	Mr & Mrs H & V Seifert			Resident	
2344	Ms J Titchener			Resident	
2345	Mr B Apps			Resident	
2346	Mrs J Lee			Resident	
2347	Ms P Edwards			Resident	
2348	Dr S Taylor			Resident	
2349	Ms E Bornati			Resident	
2350	Mr D Edwards			Resident	
2351	Mr A J Lee			Resident	
2352	Mr D Thurlow			Resident	
2353	Mrs A Lane			Resident	
2355	Ms M Edwards			Resident	
2358	Mr D Bracey			Resident	
2362	Ms P Agnew			Resident	
2363	Ms C Kingshott			Resident	
2364	Mr P Bowe			Resident	
2368	Ms V Golin			Resident	
2369	Mr Michele Mazza			Resident	
2371	Mrs H Carter			Resident	
2372	Mrs G Funnell			Resident	
2374	Ms H Edwards			Resident	
2376	Mr T Charman			Resident	
2377	Mrs D Farmer			Resident	
2379	Ms B Calvert			Resident	
2380	Ms Myra Searle			Resident	
2385	Ms R Mayo			Resident	
	Ms J Carrick			Resident	
	Ms J Hawkins			Resident	
	Mrs J Lambert			Resident	
	Mr P Manning			Resident	
	J Gadiot			Resident	
	Ms S Hillebron			Resident	
	Mr J Anthony			Resident	
	Ms L Scott			Resident	
2447	Mr D Harmsworth			Resident	

ID	Respondent	Organisation	BehalfOf	Respondent Category	Participate
2460) Mrs E Salmon			Resident	
2461	Mrs P Glenister			Resident	
2462	Ms L Iskander			Resident	
2463	B Ms M Lewis			Resident	
2464	Ms M Nightingall			Resident	
2465	Ms C Cradock			Resident	
2466	Mrs J Stewart			Resident	
2467	⁷ Mr C Johnson			Resident	
2469	Ms C Runc			Resident	
2471	Ms A Kolkin			Resident	

RESPONSE TO SUBMISSION SITES ALLOCATIONS DPD REGULATION 19

This document has four parts: Part A - Personal Details

- Part B Representation
- Part C Expanded Arguments to Support Representation
- Part D Actions I am seeking

PART A - PERSONAL DETAILS

Name	
Address	
Email	

PART B – REPRESENTATION

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

Site Allocations DPD	1	
Sustainability Appraisal	1	

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
Effective?	No	Failure to demonstrate strategic highway matters to be deliverable to resolve severe traffic constraints in East Grinstead
Consistent with National Policy?	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.

Yes

No

I support the arguments made by the Infrastructure First Group and	would
like them to represent me at the Examination.	

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 ...

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:
 - o 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
 - o New Agencies Dehaviland; Dods Monitoring & Press Association
 - Magazines Cuckfield Life; East Grinstead Living; Hurst Life; Lindfield Life; RH Uncovered & Sussex Living
 - o 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

- 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 SA19 & SA20 would lead to reduced opportunities for people to live and work within their communities

- Insustainable 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 ...
 - o 714 with permission as at April 2014
 - o 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 SA19 & SA20 would lead to unsustainable traffic congestion with local junctions already over capacity

- Material up-to-date traffic evidence is being withheld from the consultation process
- I The MSDC strategic transport assessment understates baseline traffic conditions
- E Despite this, the model highlights a severe cumulative impact in-combination with allocations in the adopted plan
- In 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."

	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

- The congestion figures for the A264 approach arm were measured in 2018 ...
 - * 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		
	AM Peak	PM Peak	Γ
Junction Capacity	61%	65%	Γ
Vehicle Queue	2	3	Γ
Queuing Delay	15 secs	21 secs	ſ

WSP Model		
AM Peak	PM Peak	
106.60%	101.40%	
48	33	
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

- 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 Imberhorne 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

- 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

- 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 nonfood 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 Gulledge 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 – 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.
- 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. I do not wish to take part in the Examination but I support the arguments made by the Infrastructure First Group and would like them to represent me at the Examination.