

## Site Allocations DPD: Regulation 19 Consultation Response

**Policy:** SA20

**ID:** 748

**Response Ref:** Reg19/748/7

**Respondent:** Ms L Brook

**Organisation:** Sussex Wildlife Trust

**On Behalf Of:**

**Category:** Statutory Consultee

**Appear at Examination?** x



**Sussex**  
Wildlife Trust

Contact: Laura Brook  
E-mail: [swtconservation@sussexwt.org.uk](mailto:swtconservation@sussexwt.org.uk)  
Date: 28 September 20

**By email only**  
[LDFconsultation@midsussex.gov.uk](mailto:LDFconsultation@midsussex.gov.uk)

## **Mid Sussex District Council Submission Draft Site Allocations Development Plan Document (DPD) (Regulation 19 Consultation August – September 2020)**

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The Sussex Wildlife Trust wish to submit the following comments to the Regulation 19 consultation for the - Mid Sussex District Council Submission Draft Site Allocations Development Plan Document (DPD)

### **Overview comments - Site Allocations**

As stated in our Regulation 18 comments The Sussex Wildlife Trust (SWT) appreciates that the DPD site selection methodology led to the exclusion of sites that were likely to result in an impact on locally designated sites, as explained in figure 3.1 of the Site Selection Paper 3. This is very welcome and SWT considers this approach to be in line with the NPPF requirement to distinguish between the hierarchy of designated sites and allocate land with the least environmental or amenity value (paragraph 171). Local Wildlife Sites act as core areas within the district's ecological network and therefore should be maintained and enhanced.

That said, overall SWT is very concerned about the proportion of greenfield sites being allocated within the DPD, particularly given that no site specific ecological data appears to have been provided or considered in the site selection process.

The NPPF is clear that local authorities should make as much use as possible of previously developed land. However with over 60% of housing allocations obviously on greenfield, and another 18% appearing to contain some element of greenfield, SWT are particularly concerned

**SWT therefore does not believe that the DPD is consistent with national policy as it does not comply with paragraph 118 of the NPPF.**

In the Regulation 18 Consultation submitted by SWT, we highlighted that The NPPF is clear that plans and policies need to be justified – based on proportional and up-to date evidence (paragraphs 31 and 35). SWT acknowledge that we were given the opportunity in October 2018 to comment on a number of candidate sites which had the potential to impact on locally designated sites. In our letter to MSDC (dated 15/10/18) we stated that:

*'Should MSDC decide that SHELAA sites proceed to allocation within the DPD, SWT recommends that they are subject to up to date ecological surveys. This will enable MSDC to evaluate each allocation's suitability for delivering sustainable development, in line with the Mid Sussex Local Plan evidence base and in particular, policies 37 (Trees woodland and Hedgerow) and 38 (Biodiversity).'*

SWT note that all of the housing site allocation policies include requirements under 'Biodiversity and Green Infrastructure' which is welcome. However, these do not appear to be strategic in nature in terms of considering a robust evidence base. In particular, it appears that it is assumed that sites will be able to deliver both the number

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of dwellings allocated and net gains to biodiversity, when no evidence has been provided of the current biodiversity value or how this is likely to be impacted.

SWT is therefore disappointed that we are unable to identify any site-specific ecological evidence by this final round of consultation. Given the current uncertainty of the ecological value individually and cumulatively of the site allocations. **It is not clear how MSDC can ensure the net environmental gains will be delivered by the DPD as required by paragraphs 8, 32, 170 and 174 of the NPPF.**

### **Overview comments – Sustainability**

We also see no evidence that consideration has been given to the capacity for the district's natural capital to absorb this level and location of development. The NPPF is clear that delivering sustainable development means meeting the needs of the present without compromising the ability of future generations to meet their own needs. In achieving this, local planning authorities must pursue all three objectives; economic, social and environmental, in mutually supportive ways ensuring net gains across all three.

It is not clear that any of the greenfield sites allocated meet the environmental objective. In Particular, none of the allocated greenfield sites are considered to have a positive impact on any of the 8 environmental objectives within the Sustainability Appraisal (SA). Many have negative or unknown impacts, and for biodiversity it appears that only formal designations have been considered.

Although the lack of ecological information available makes it very hard for SWT to assess the potential impact of any of the site allocations or the assessment of their suitability against the SA objectives, we are particularly concerned about additional sites that are not considered to be sustainable, namely SA12 and SA13.

The addition of these two 'marginal' sites takes the number of units allocated within Category 1 settlements to 1409, this is 703 units above the minimum residual housing figure for Category 1 as demonstrated in *Table 2.4: Spatial Distribution of Housing Requirement*. If you take account of the undersupply for some of the other sized settlements, there is still a total oversupply of 484 dwellings as demonstrated in *Table 2.5 Sites DPD housing Allocations*. This oversupply is not justified within the DPD or supporting evidence base. Removing these 'marginal' sites will still result in the DPD that delivers more than the minimum housing requirement in the lifetime of the local plan. We note that again the impacts on biodiversity for these sites are listed as unknown in the SA simply because no site specific ecological information has been assessed.

**SWT asks MSDC to reduce the amount of greenfield land allocated within the DPD and consider the environmental capacity of the district in a more robust fashion. Any assessment of allocated sites should look at their individual, collective and multifunctional role in delivering connectivity and function for biodiversity. This would ensure the DPD reflects the requirements under sections 170 & 171 of the NPPF.**

### **SA GEN: General Principles for Site Allocations**

It appears that this policy has now been placed in the main body of the Draft Plan. SWT welcomes the inclusion of wording within this policy that recognises the importance of biodiversity informing planning applications. We also acknowledge that it highlights the importance of delivering biodiversity net gains through forthcoming development.

For clarity SWT would propose that there is an amendment to the wording relating to ecological information as we want to ensure that developers are aware that this information is required before validation/determination of the application, so earliest opportunity is not misunderstood as after permission has been approved.

SWT propose the following amendment to the first bullet point under the section references Biodiversity and Green Infrastructure (~~struck through~~ means a proposed deletion and **bolded text** references a proposed addition)

- Carry out **and submit** habitat and species surveys at the earliest opportunity in order **to inform the design and** ~~to~~ conserve important ecological assets from negative direct and indirect effects.

### **Comments for Site Allocations**

As stated previously, without more detailed ecological information for each of the allocated sites it is difficult for SWT to assess their suitability for development. However, we will make some site specific comments based on the aerial photographs and desktop information available to us.

**A lack of comments does not constitute support for the allocation.**

#### **SA12: Land South of 96 Folders Lane, Burgess Hill**

As stated under our general comments, SWT does not believe that the allocation of this greenfield site is justified. It is not required to deliver the overall minimum residual housing requirement or that required for Category 1 settlements and is not considered sustainable within the SA. We acknowledge that the number of the dwellings for the site has been reduced by 3, however the biodiversity impacts for this site are still listed as unknown as no site specific ecological information has been provided. The site appears to contain hedgerow and trees and is clearly connected to a wider network of linear habitats.

**SWT therefore does not believe that the Allocation is consistent with national policy as it does not comply with paragraph 171 of the NPPF.**

#### **SA13: Land East of Keymer Road and South of Folders Lane, Burgess Hill**

As with SA12, SWT objects to the allocation of this greenfield site. It is not justified by MSDC's own evidence base and does not represent sustainable development. Again the biodiversity impacts for this site are still listed as unknown as no site specific ecological information has been provided. However, the site appears to contain rough grassland, hedgerows and trees and is clearly connected to a wider network of linear habitats and ponds with potential for priority species.

**SWT therefore does not believe that the Allocation is consistent with national policy as it does not comply with paragraph 171 of the NPPF.**

#### **SA15: Land South of Southway, Burgess Hill**

SWT objects to the allocation of a designated Local Green Space for housing. This is not compliant with NPPF paragraph 101 which states that policies for managing development within Local Green Space should be consistent with those for Green Belts i.e. in line with the requirements of chapter 13 of the NPPF.

We do not believe that MSDC have justified the 'inappropriate construction of new buildings' within a local green space. In particular, the fact that this area of the LGS is 'overgrown and inaccessible' does not negate its value. The Burgess Hill Neighbourhood Plan states that this LGS is an important "green lung" for the west of Burgess Hill, a function which does not require accessibility. The NPPF is clear that LGSs should only be designated where they are demonstrably special. The Planning Inspector who examined the Burgess Hill Neighbourhood Plan clearly felt that this had been demonstrated and therefore the site should be protected.

**SWT therefore does not believe that the Allocation is consistent with national policy as it does not comply with paragraphs 99-101 of the NPPF.**



#### **SA19: Land south of Crawley Down Road, Felbridge**

SWT is very concerned about this significant greenfield allocation given the lack of any baseline biodiversity data and its proximity to Hedgecourt Lake SSSI and The Birches ancient woodland. SWT would like to see much more evidence of the current value of the site, in particular in terms of ecosystem services delivery. There also needs to be further consideration of the cumulative impacts when combined with policy SA20.

**SWT therefore does not believe that the Allocation is consistent with national policy as it does not comply with paragraph 171 & 175 of the NPPF.**

#### **SA20: Land south and west of Imberhorne Upper School, Imberhorne Lane, East Grinstead**

SWT commented on this allocation in our letter dated (dated 15/10/18) and stated that up to date ecological surveys should be conducted in order to assess the site's suitability for delivering sustainable development. It is disappointing that this information has not been provided. Without it we cannot assess the ability of this site to meet the environmental objectives required by the NPPF. We note that the allocation boundary appears to be amended from the Regulation 18 consultation and that a section of the Worth Way LWS, namely part of Imberhorne Cottage Shaw ancient woodland, appears to no longer be within the allocation. We would ask MSDC to inform SWT if this is not the case.

**SWT remain concerned that this Allocation is not consistent with national policy as it does not comply with paragraph 171 & 175 of the NPPF**

SWT note the policy requirements under Biodiversity and Green Infrastructure heading includes a bullet point which states:

*Potential impacts of the development on Hedgecourt Lake SSSI, which is accessible via existing PRoW to the north and the Worth Way LWS to the south should be understood and adequately mitigated.*

SWT propose the following amendment to this bullet point to ensure clarity of the importance of avoid within the mitigation hierarchy is fulfilled as per 175 of the NPPF (~~struck through~~ means a proposed deletion and **bolded text** references a proposed addition)

*Potential impacts of the development on Hedgecourt Lake SSSI, which is accessible via existing PRoW to the north and the Worth Way LWS to the south should be understood **so they can be avoided and if this is not possible** adequately mitigated **or, as a last resort, compensated for.***

### **DEVELOPMENT POLICIES**

#### **SA35: Safeguarding of Land for delivery of Strategic Highways improvements**

SWT acknowledges that the Regulation 19 consultation now includes maps of the broad locations for the safeguarding, which did not appear to be present in the main body of the Regulation 18 draft DPD.

We note that the policy refers to how new development in the area of safeguarding should be carefully designed. Given that the NPPF encourages a net gain to biodiversity through development, we would expect the policy wording to reflect that biodiversity gains are design carefully into the development to ensure they are not compromised by future schemes. We therefore propose the following amendments to the policy wording to ensure that it complies with sections 170 & 171 of the NPPF.

SWT propose the following amendment to the Policy Wording (~~struck through~~ means a proposed deletion and **bolded text** references a proposed addition)

*'New Development in these areas should be carefully designed having regard to matters such as building layout , noise insulation, landscaping , the historic environment, **biodiversity net gains** and means of access.'*

### **SA36: Wivelsfield Railway Station**

While we support the integrated use of sustainable transport it is disappointing to see another area allocated as Local Green Space within a made Neighbourhood Plan being developed. As stated in our comments for policy SA15, the suitability of the LGS designation was assessed by a Planning Inspector and found sound. It should therefore be preserved through the DPD. SWT is particularly concerned as the Burgess Hill Neighbourhood Plan states that this Local Green Space is:

*'Land immediately west of Wivelsfield Station, north and south of Leylands Road: The land parcel is rich in birdlife and reflective of the historic field pattern. The Land is an important open space that is particularly well used by dog walkers.'*

Whilst it appears that not all of the LGS has been allocated for the upgrading of the station, we are not clear of the biodiversity value of the area that has been allocated. If MSDC are minded to retain the policy, SWT would like to see consideration of the compensation required for the loss of the LGS and in particular the rest of the LGS managed/enhanced in a way that benefits the assets lost.

**SWT therefore does not believe that the Development Policy is consistent with national policy as it does not comply with sections 99-101 of the NPPF.**

### **SA37: Burgess Hill /Haywards Heath Multifunctional Network**

SWT remain supportive of measures to embed multifunctional networks in delivering non-motorised sustainable transport options, but remain concerned at the level of uncertainty from this policy. We appreciate that the regulation 19 consultation now embeds a map within the main document, which provides an indication of safeguarded routes for the cycleway. As stated in our Regulation 18 comments the creation of a network could aid or hinder connection and function in the natural environment, therefore the policy should be clear in its intention. In particular, we are unclear how this route has been selected and what ecological information has been considered. Any impacts on biodiversity should be avoided through good design and particular consideration should be given to the value of sensitive linear habitats such as hedgerows. Lighting and increased recreational use both have the potential to harm biodiversity and must be considered at an early stage. It would not be appropriate to safeguard a route that has not yet been assessed in terms of potential biodiversity impacts.

Yours sincerely,

Laura Brook  
Conservation Officer  
Sussex Wildlife Trust

## Site Allocations DPD: Regulation 19 Consultation Response

**Policy:** SA20

**ID:** 827

**Response Ref:** Reg19/827/1

**Respondent:** Mr G Wallace

**Organisation:**

**On Behalf Of:**

**Category:** Resident

**Appear at Examination?** x

[REDACTED]

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**From:** Grant Wallace [REDACTED]  
**Sent:** 17 September 2020 19:51  
**To:** ldfconsultation  
**Subject:** SA20 550 Houses Imberhorne Farm - Regulation 18 Consultation

Dear Sirs,

I wish to register an objection to the proposed development of 550 Houses Imberhorne Farm - Regulation 18 Consultation - SA20.

Whilst I support the development of the school, my objections are as follows:-

1) the proposed building of some 550 properties will result in the loss of valuable arable landscape and habitat together with the recreational value of the land. I believe a beautiful thriving countryside is important to everyone, no matter whether they live or how old. The town's residents recharge their batteries with a walk, run or bike ride in the local green belt and this would be lost with the proposed development. With Covid-19 and the lockdown, these fields where you propose to develop properties were invaluable for the local residents and offered escape from a world of uncertainty. If you develop and limit the access, you risk overcrowding and causing congestion on paths which have remained open for many centuries.

2) As set out in the East Grinstead Neighbourhood Plan 2016, the area was considered as countryside and as an area of development constraint which in my opinion should be adhered to as it is an inappropriate development.

It will ruin the character of the area and remove countryside hedged fields which so many birds and animals use as their habitat.

In addition the Neighbourhood plan advised that were the area to be developed it would erode the openness and contribute to the coalescence of East Grinstead with Crawley Down and Copthorne. As quoted 9.16 - the area contributes to the setting and rural context of East Grinstead. Whilst it is recognised that the land is not constrained by the AONB designation, it has considerable value as an open countryside that the local community wish to retain.

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 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.

3) Access to the proposed development will cause disruption to roads which already are in need of significant infrastructure improvement. The suggested access on Imberhorne Lane by both access roads, will lead to substantial congestion as people try to gain access to the A22.

Whilst some will turn to go up the Imberhorne Lane, most vehicles turn left heading to the junction of the A22 and will queue by the school. It will also cause disruption to the business and other homes on Imberhorne Lane and the neighbouring roads.

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 including the 550, 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”.

Using the model supplied by the Department of Transport, for each Household the average number of vehicles per household is 1.4 (2020); this means that for 550 homes there could be as much as 770 vehicles being added to an already busy road structure.

It should be noted that the MSDC has only recently made improvements to Imberhorne Lane for speed restrictions which related to the Oaks residential development and pedestrian access off of the development. For all years prior residents had to exit the Oaks development on foot via the main entrance or down by the school, despite residents raising main safety concerns these were all cast aside. It should be noted that these improvements were many years in the planning and were some 5 years after the Oaks Development was completed.

4) Whilst the proposed development identifies no Air Quality or Noise issues, it fails to recognise the Air Quality that the development would create for the local school and proposed new school. Vehicle emissions which come from vehicle's idling next to the school and new school will only increase with the increase of homes in the area.

5) Available Brownfield Land as established in the East Grinstead Neighbourhood Plan are more suitable for such developments such as the Charlwood Industrial Estate, which has previously been considered for a mix of housing and business uses. The old site of Hobbs Barracks could also be an alternative site.

6) No new jobs are planned for East Grinstead. 7 new employment sites are proposed for the district but none in East Grinstead. Gatwick Airport only has the North Terminal open and whilst the South may open in the new year, this is not guaranteed. With Covid-19, more people are out of work or are working from home, the infrastructure needed to maintain an additional 550 homes needs to be improved. The only current broadband providers in the area are provided by BT Openworld. There are no alternative providers such as Virgin with cable.

Other services will need to be improved and whilst the proposal includes shops, this could take trade from the existing commercial premises along the London Road.

In June 2020, Mid Sussex gave permission to turn the last remaining large office block, Grinstead House in Wood Street, into 253 residential apartments further reducing employment space and adding many more residents, many of whom will need to commute out of East Grinstead for work.

Increasing traffic congestion and loss of employment space act as a significant constraint on economic growth and investment in East Grinstead which again runs counter to District Plan strategic objectives to support sustainable economic growth [Policy DP1].

A stated aim of Policy DP1 is “To promote a place which is attractive to a full range of businesses, and where local enterprise thrives”. This will clearly not occur if we add more housing which cannot be sustained or supported.

If you would kindly note the objection.

Kind regards,

Grant Wallace

[REDACTED]

## Site Allocations DPD: Regulation 19 Consultation Response

**Policy:** SA20

**ID:** 910

**Response Ref:** Reg19/910/4

**Respondent:** Ms V Riddle

**Organisation:** Tandridge District Council

**On Behalf Of:**

**Category:** Local Authority

**Appear at Examination?** x

Planning Policy Team  
Mid Sussex District Council  
(via email)

If calling please ask for *Vivienne Riddle*  
on 01883 732883

E-mail: [LocalPlan@tandridge.gov.uk](mailto:LocalPlan@tandridge.gov.uk)

*Date: 30 September 2020*

Dear Planning Policy Team,

Thank you for providing us with the opportunity to comment on the Draft Site Allocations DPD (Regulation 19).

Under the Duty to Cooperate, as set out within the most up-to-date Statement of Common Ground, Tandridge and Mid Sussex have engaged on an ongoing basis throughout the preparation of the Sites DPD.

However, and as highlighted in our Reg 18 response, we are aware that there are two schemes which are of a scale and proximity to our district such that they have the potential to impact on our residents. They are SA19: Land south of Crawley Down Road, Felbridge (200 units) and SA20: Land south and west of Imberhorne Upper School, Imberhorne lane, East Grinstead (550).

#### Highways

One of the main issues in this locality is that of highway capacity at various locations. As set out in the most up-to-date Statement of Common Ground it is agreed that transport schemes are required at various locations, including the A22/A264 junction, and that we will continue to work together, along with the respective county councils, to investigate potential mitigation options. It is recognised that the preferred option may require cross boundary land and policy SA35: Safeguarding of Land for and Delivery of Strategic Highway Improvements, which sets out a requirement to identify, secure and protect any land needed for this purpose, is supported. We would expect that a mitigation option to have been agreed by all parties before the commencement of any development in the vicinity, so that we can be ensured that the impact will be mitigated and contributions towards the highways improvements are sought. As such, that wording to this effect is included within the policies (SA19 and SA20) as a main modification.

#### Site Allocations

It is noted that the site allocation policies for each sets out detailed requirements, including a requirement to work collaboratively with Surrey and West Sussex County Council Highway Authorities to mitigate development impacts by maximising sustainable transport enhancements, and where additional impacts remain, consider highway mitigation measures. Furthermore, they also seek to secure contributions towards necessary capacity and safety improvements to junctions impacted by the development in the vicinity of the site along the A22/A264 corridor, having taken account of any sustainable transport interventions. Tandridge supports the detailed requirements given the known capacity issues but as above would like to see more commitment in having an agreed mitigation scheme that the sites contribute towards before the developments commence.

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### Settlement Hierarchy

Tandridge notes that site SA19 has been identified as being within the proposed built-up boundary of East Grinstead and as such has the same settlement category (Category 1). However, it is also being described as an extension to Felbridge, with its vehicular access off Crawley Down Road and policy requirements setting out that the any proposals maximise connectivity with Felbridge. It is also noted that, at present, the built-up boundary narrows to a thin line between the main built up area of East Grinstead and development to the south of Crawley Down Road but this boundary is being amended to include an area of land located between this site allocation and the main built-up area of East Grinstead. Notwithstanding this it is noted that policy DP13 of the Mid Sussex Development Plan 2014-2031 seeks to prevent the coalescence of settlements which harms the separate identity and amenity of settlements and the maintenance of this undeveloped gap reinforces the fact that they are separate settlements.

Our Settlement Hierarchy (2015 and 2018 Addendum) identifies Felbridge as a Tier 3 Rural Settlement which demonstrates a basic level of provision. However, it also recognises the relationship with out-of-district settlements, noting that residents rely on East Grinstead for services such as healthcare facilities, secondary schools and a train station. In arriving at our Preferred Strategy we considered a number of different approaches, including an approach with development focused on our Tier 3 settlements. Our Sustainability Appraisal concluded that such an approach would be unsustainable, with limited gains when compared to the impact on the environment and the settlements themselves. Tandridge's approach therefore does not include directing development towards this settlement.

### Health

Tandridge supports the proposed approach of either on-site provision or contributions for off-site expansion of GP surgeries. (SA20) These requirements are welcomed as they will help mitigate the impact on GP surgeries within our administrative area.

### SANG

The provision of SANG to the west of SA20 is supported. As set out in the Statement of Common Ground we agree to continue to engage positively on an ongoing basis to ensure the proposed SANG provision is appropriately defined and designed and makes best use of opportunity for strategic provision if this is shown to be appropriate. We would like to continue discussions about whether Tandridge District Council could utilise the SANG to offset the impact on Ashdown Forest from development on our border.

### Education

The provision of land and financial contribution for early years and primary school (2FE) provision with Early Years pre-school and facilities for Special Educational Needs (2.2ha) on SA20 is noted. This coupled with the proposed measures to protect and improve the PROW which would provide linkages between SA19 and SA20 are welcomed in terms of the additional provision and providing the potential opportunity to access the education provision on SA20 by non-car means thereby lessening the potential impact on education provision within Tandridge.

### Flooding

It is noted that part of site allocation SA19 contains Flood Zone 3. The site allocation policy wording sets out that, informed by a Flood Risk Assessment, a sequential approach shall be applied to ensure all development avoids the flood extent for the 1 in 100 year event, including a climate change allowance and Tandridge supports this.

Yours sincerely,

Sarah Thompson  
Head of Strategy

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## Site Allocations DPD: Regulation 19 Consultation Response

**Policy:** SA20

**ID:** 913

**Response Ref:** Reg19/913/2

**Respondent:** Mr J Greene

**Organisation:** Surrey County Council

**On Behalf Of:**

**Category:** Local Authority

**Appear at Examination?** x

Email: [planning.consultations@surreycc.gov.uk](mailto:planning.consultations@surreycc.gov.uk)



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Sent by email to: [LDFconsultation@midsussex.gov.uk](mailto:LDFconsultation@midsussex.gov.uk)

28 September 2020

Dear Sir/Madam

**Mid Sussex District Council Draft Site Allocations Development Plan Document (DPD) - Regulation 19 Submission Consultation**

Thank you for consulting Surrey County Council on the Mid Sussex Planning Policy Draft Site Allocations DPD. We have responded to previous MSDC consultations to express our concerns regarding the potential cross-boundary impacts of proposed new development in Surrey. This response supports the signed Statement of Common Ground (SoCG) between our two authorities and sets out how we will work together on strategic matters.

Our response relates to two site allocations in the submission consultation DPD that are in close proximity to the boundary with Surrey. These are:

- SA19: Land south of Crawley Down Road, Felbridge; and
- SA20: Land south and west of Imberhorne Upper School, Imberhorne Land, East Grinstead

**Highways**

We are satisfied that both site allocations refer to working with Surrey County Council to mitigate the impact of the development, that sustainable transport enhancements will be sought wherever possible and that improvements to the A22/A264 corridor will be progressed. As the SoCG states, we look forward to working further with you (and Tandridge District Council where necessary) to mitigate the impact of these developments on the strategic highway network.

**Education**

Our education team have been in contact with Mid Sussex education colleagues regarding the impact that site allocations SA19 and SA20 may have on Felbridge Primary School. We look forward to further liaison between our two councils to ensure that cross boundary impacts in Surrey arising from these developments are mitigated.

If you have any queries, please do not hesitate to contact James Greene by email at [james.greene@surreycc.gov.uk](mailto:james.greene@surreycc.gov.uk).

Yours sincerely



James Greene  
Spatial Planning Officer

## Site Allocations DPD: Regulation 19 Consultation Response

**Policy:** SA20

**ID:** 948

**Response Ref:** Reg19/948/1

**Respondent:** Mrs H Lawrence

**Organisation:**

**On Behalf Of:**

**Category:** Resident

**Appear at Examination?** x

<b>Name</b>	helen lawrence
<b>Address</b>	[REDACTED]
<b>Phone</b>	[REDACTED]
<b>Email</b>	[REDACTED]
<b>Which document are you commenting on?</b>	Site Allocations DPD
<b>Sites DPD Policy Number (e.g. SA1 - SA38)</b>	SA20
<b>Do you consider the Site Allocations DPD is in accordance with legal and procedural requirements; including the duty to cooperate</b>	Yes
<b>(1) Positively prepared</b>	Unsound
<b>(2) Justified</b>	Unsound
<b>(3) Effective</b>	Unsound
<b>(4) Consistent with national policy</b>	Unsound
<b>Please outline why you either support or object (on legal or soundness grounds) to the Site Allocations DPD</b>	<p>I strongly believe this will have a very negative impact on local wildlife including bats, deer and slow worms. I currently live on The Oaks and am fortunate to witness these species on a regular basis!</p> <p>I also believe it will seriously impact the use of the space for exercise! The infrastructure is just not good enough to support the additional housing let alone the traffic congestion on Imberhorne Lane/ London Rd! I am totally against this as the extra houses could potentially cause 1100 cars minimum.</p> <p>It's such a shame to lose wonderful space which was used so much in lockdown! Total disgrace!</p>
<b>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.</b>	This is a totally unfair use of green space!
<b>If you wish to provide further documentation to support your response, you can upload it here</b>	
<b>If your representation is seeking a change, do you consider it necessary to attend and give evidence at the hearing part of the examination</b>	No, I do not wish to participate at the oral examination
<b>Please notify me when-The Plan has been submitted for Examination</b>	yes
<b>Please notify me when-The publication of the recommendations from the Examination</b>	yes
<b>Please notify me when-The Site Allocations DPD is adopted</b>	yes
<b>Date</b>	06/09/2020

**1005**

## Site Allocations DPD: Regulation 19 Consultation Response

**Policy:** SA20

**ID:** 1005

**Response Ref:** Reg19/1005/3

**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.

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.<sup>8</sup>**

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.

**1410**

## Site Allocations DPD: Regulation 19 Consultation Response

**Policy:** SA20

**ID:** 1410

**Response Ref:** Reg19/1410/1

**Respondent:** Ms J Barter

**Organisation:**

**On Behalf Of:**

**Category:** Resident

**Appear at Examination?** x

<b>Name</b>	Julie Barter
<b>Address</b>	[REDACTED]
<b>Email</b>	[REDACTED]
<b>Name or Organisation</b>	Julie Barter
<b>Which document are you commenting on?</b>	Site Allocations DPD
<b>Sites DPD Policy Number (e.g. SA1 - SA38)</b>	SA20
<b>Do you consider the Site Allocations DPD is in accordance with legal and procedural requirements; including the duty to cooperate</b>	Yes
<b>(1) Positively prepared</b>	Sound
<b>(2) Justified</b>	Unsound
<b>(3) Effective</b>	Unsound
<b>(4) Consistent with national policy</b>	Sound
<b>Please outline why you either support or object (on legal or soundness grounds) to the Site Allocations DPD</b>	<p>The site for SA20 is an important space for the residents of East Grinstead. It is in constant use as a place of exercise and a space to enjoy the benefits of nature. There is a wide range of wild life in the area including deer. The bird population is large and varied and it is the only place in the local area to hear skylarks.</p> <p>There are also grave concerns about the impact on the local environment in terms of increased traffic and access. Imberhorne Lane is already extremely busy with cars, vans and lorries. As a local resident I have observed that the recent 'traffic calming' measures have done little to calm the traffic.</p> <p>The description of the plans states that this development will provide an extension to East Grinstead. Why does it need to be extended? The number of developments elsewhere in the town mean that there are already too many people for the available services. The traffic congestion leading into town has always been legendary but it has increased to epic proportions in the 9 years I have lived here. I have re-read the East Grinstead Neighbourhood Plan which, I understand, is supposed to be taken into account when considering new development. I do not believe this has happened in this case especially in terms of the loss of green space in the town.</p>
<b>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.</b>	<p>I do not support the development. However if it is deemed necessary I feel that it should be smaller and not involve the destruction of all the space currently outlined in the plan. A more compact development would reduce the impact on the local environment and retain the natural diversity of the countryside.</p>
<b>If you wish to provide further documentation to support your response, you can upload it here</b>	
<b>If your representation is seeking a change, do you consider it necessary to attend and give evidence at the hearing part of the examination</b>	No, I do not wish to participate at the oral examination
<b>Please notify me when-The Plan has been submitted for Examination</b>	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**

04/08/2020

**1413**

## Site Allocations DPD: Regulation 19 Consultation Response

**Policy:** SA20

**ID:** 1413

**Response Ref:** Reg19/1413/1

**Respondent:** Mr R Smith

**Organisation:**

**On Behalf Of:**

**Category:** Resident

**Appear at Examination?** x

<b>Name</b>	Robert Smith
<b>Address</b>	[REDACTED]
<b>Email</b>	[REDACTED]
<b>Which document are you commenting on?</b>	Community Involvement Plan
<b>Do you consider the Site Allocations DPD is in accordance with legal and procedural requirements; including the duty to cooperate</b>	No
<b>(1) Positively prepared</b>	Unsound
<b>(2) Justified</b>	Unsound
<b>(3) Effective</b>	Unsound
<b>(4) Consistent with national policy</b>	Unsound
<b>Please outline why you either support or object (on legal or soundness grounds) to the Site Allocations DPD</b>	<p>East Grinstead has been massively overdeveloped in recent years with no added infrastructure.</p> <p>But my strongest objection is for a sit for travellers, [REDACTED]</p> <p>[REDACTED]</p>
<b>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.</b>	Stop the development altogether, why do we need anymore
<b>If you wish to provide further documentation to support your response, you can upload it here</b>	
<b>If your representation is seeking a change, do you consider it necessary to attend and give evidence at the hearing part of the examination</b>	No, I do not wish to participate at the oral examination
<b>Please notify me when-The publication of the recommendations from the Examination</b>	yes
<b>Date</b>	06/08/2020

1414

## Site Allocations DPD: Regulation 19 Consultation Response

**Policy:** SA20

**ID:** 1414

**Response Ref:** Reg19/1414/1

**Respondent:** Ms K Fisher

**Organisation:**

**On Behalf Of:**

**Category:** Resident

**Appear at Examination?** x



<b>Name</b>	Katy Fisher
<b>Address</b>	[REDACTED]
<b>Email</b>	[REDACTED]
<b>Which document are you commenting on?</b>	Site Allocations DPD
<b>Sites DPD Policy Number (e.g. SA1 - SA38)</b>	SA20
<b>Do you consider the Site Allocations DPD is in accordance with legal and procedural requirements; including the duty to cooperate</b>	Yes
<b>(1) Positively prepared</b>	Sound
<b>(2) Justified</b>	Unsound
<b>(3) Effective</b>	Unsound
<b>(4) Consistent with national policy</b>	Sound
<b>Please outline why you either support or object (on legal or soundness grounds) to the Site Allocations DPD</b>	<p>I live opposite the site on which you wish to build.</p> <p>There is no information as to what the care vilage will look like. Can this be provided, is it bungalows, flats?</p> <p>Can you confirm if a doctor's surgery will be part of the plans, I believe this was discussed at early stages?</p> <p>There is an abundance of wildlife in the area and one of my main concerns is destroying their habitat. Yes you will be putting a 'green area' towards the back of the housing, but you are massively reducing the wildlife's homes. Will you consider creating a 'channel of green' throughout the development. Allowing nature to pass through easily as they have done thousands of years?</p> <p>Another thought is, will there be a local shop in the development?</p> <p>Lastly safe crossing points on Imberhorne lane must be in place.</p> <p>Thanks for reading!</p> <p>Katy</p>
<b>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.</b>	As above
<b>If you wish to provide further documentation to support your response, you can upload it here</b>	
<b>If your representation is seeking a change, do you consider it necessary to attend and give evidence at the hearing part of the examination</b>	No, I do not wish to participate at the oral examination
<b>Please notify me when-The Plan has been submitted for Examination</b>	yes
<b>Please notify me when-The publication of the recommendations from the Examination</b>	yes
<b>Please notify me when-The Site Allocations DPD is adopted</b>	yes
<b>Date</b>	06/08/2020

1415

## Site Allocations DPD: Regulation 19 Consultation Response

**Policy:** SA20

**ID:** 1415

**Response Ref:** Reg19/1415/2

**Respondent:** Ms C Rowell

**Organisation:**

**On Behalf Of:**

**Category:** Resident

**Appear at Examination?** x

<b>Name</b>	Christine Rowell
<b>Address</b>	[REDACTED]
<b>Email</b>	[REDACTED]
<b>Name or Organisation</b>	Imberhorne Farm
<b>Which document are you commenting on?</b>	Site Allocations DPD
<b>Do you consider the Site Allocations DPD is in accordance with legal and procedural requirements; including the duty to cooperate</b>	No
<b>(1) Positively prepared</b>	Unsound
<b>(2) Justified</b>	Unsound
<b>(3) Effective</b>	Unsound
<b>(4) Consistent with national policy</b>	Unsound
<b>Please outline why you either support or object (on legal or soundness grounds) to the Site Allocations DPD</b>	<p>I do not support the further development at Imberhorne Farm. I have lived in the Felbridge area for 80 years and now live on the main London Road. Green spaces that are accessible to residents are increasingly pushed out to the margins for our community, affecting quality of life on every level. The traffic congestion on the London Road, Imberhorne Lane and Heathcote Drive are now intolerable for large parts of the day. This is not only a health hazard for residents, but makes it very hard for anyone to move around the area with ease, especially the emergency services. It is inconceivable that 60 years after the first objection to a by-pass was permitted, building continues. The infrastructure of East Grinstead cannot continually be increased with homes, without additional services like schools, leisure facilities and other services that make life bearable continuing apace with no consideration to how people move around and through this area and the town generally.</p>
<b>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.</b>	This is your job not mine- please see above.
<b>If you wish to provide further documentation to support your response, you can upload it here</b>	
<b>If your representation is seeking a change, do you consider it necessary to attend and give evidence at the hearing part of the examination</b>	No, I do not wish to participate at the oral examination
<b>Please notify me when-The Plan has been submitted for Examination</b>	yes
<b>Please notify me when-The publication of the recommendations from the Examination</b>	yes
<b>Please notify me when-The Site Allocations DPD is adopted</b>	yes
<b>Date</b>	06/08/2020

1416

## Site Allocations DPD: Regulation 19 Consultation Response

**Policy:** SA20

**ID:** 1416

**Response Ref:** Reg19/1416/1

**Respondent:** Mr J Tooth

**Organisation:**

**On Behalf Of:**

**Category:** Resident

**Appear at Examination?** x

<b>Name</b>	Jeremy Tooth
<b>Address</b>	[REDACTED]
<b>Email</b>	[REDACTED]
<b>Which document are you commenting on?</b>	Site Allocations DPD
<b>Sites DPD Policy Number (e.g. SA1 - SA38)</b>	SA20
<b>Do you consider the Site Allocations DPD is in accordance with legal and procedural requirements; including the duty to cooperate</b>	Yes
<b>(1) Positively prepared</b>	Unsound
<b>(2) Justified</b>	Unsound
<b>(3) Effective</b>	Unsound
<b>(4) Consistent with national policy</b>	Unsound
<b>Please outline why you either support or object (on legal or soundness grounds) to the Site Allocations DPD</b>	As usual East Grinstead is already over populated in regards to schools, doctors, parking and congestion. 550 more homes will not benefit the community unless serious investment is put into the amenities above! Not only that, but the location proposed is 1) off Imberhorne lane which is already gridlocked with congestion during the weekly commuting hours so would cause even more congestion onto A22 at Felbridge, but also congestion through neighbouring Gardenwood estate. Location issue 2) located on land near Imberhorne Farm / The Gullage, you would be taking away precious green space with many East Grinstead residents use for dog walking / exercise, especially at the moment! People move to East Grinstead because of the countryside and green space available. DO NOT TURN IT INTO A BIG TOWN AND RUIN WHAT MAKES IT SPECIAL!!
<b>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.</b>	No change, just scrap the idea!
<b>If you wish to provide further documentation to support your response, you can upload it here</b>	
<b>If your representation is seeking a change, do you consider it necessary to attend and give evidence at the hearing part of the examination</b>	No, I do not wish to participate at the oral examination
<b>Date</b>	06/08/2020

1417

## Site Allocations DPD: Regulation 19 Consultation Response

**Policy:** SA20

**ID:** 1417

**Response Ref:** Reg19/1417/1

**Respondent:** Mr M Richardson

**Organisation:**

**On Behalf Of:**

**Category:** Resident

**Appear at Examination?** x

**From:** Matt Richardson [REDACTED]  
**Sent:** 06 August 2020 20:17  
**To:** ldfconsultation  
**Subject:** Site allocations DPD - SA 20

**Categories:** SiteDPD

Dear Sir/ Madam,

I am writing to object to the proposed development of the above site allocation SA 20 - land south and west of Imberhorne Upper school, Imberhorne Lane, East Grinstead.

My objections are as follows:

(1) Insufficient road infrastructure to take any increase in traffic. This is by far the biggest issue. The proposed plans suggest a roundabout at the bottom of Heathcote Drive. Although there is an additional road the other side of the oaks traffic will be predominantly flowing in the direction of where Imberhorne Lane meets the a22 (in order to access the a22, a264 and subsequently the m23).

(a) This junction is already insufficient to deal with the current levels of traffic and regularly queues along Imberhorne lane, up Heathcote Drive and past the mini roundabout where Heathcote Drive meets Gardenwood Road.

(b) The increase in traffic on surrounding roads will be unacceptable. Specifically heathcote drive (for those attempting to head south on the a22 and bypass a section of it) and heathcote drive & gardenwood road (for those attempting to access East Grinstead town centre).

(2) The development of further areas of countryside.

(a) The proposed fields and paths are regularly used for dog walking, cycling and horseriding. Although some provision has been made, this is 2 fields further down and there are elderly residents that use the existing fields that will find this too far. The provision made will also become crowded with the additional households as well as existing east grinstead residents using this space.

(b) The current fields also support a host of wildlife, butterflies, bees, bats, deer, badgers, foxes etc all which will be displaced.

(3) Many residents are unaware of the proposed site plans and many who live on the gardenwood/imberhorne estate are elderly (given the high proportion of bungalows on the estate) and do not have access to view the information online. I propose leaflets to be distributed to allow an appropriate consultation with those that will be directly affected.

(4) insufficient services / amenities

(a) schools - although provision is being made to extend imberhorne upper school and provide primary facilities this is no doubt with the view of the upper school incorporating imberhorne primary school and the existing primary school site being used for further development. Therefore local residents will not be gaining any additional school places.

(b) dentists - these facilities are already oversubscribed in East Grinstead

(c) doctors - these facilities are already oversubscribed in East Grinstead. Although provision has been made within the plans. These may not come to fruition and will further stress the local amenities / services.

I look forward to receiving your reply acknowledging the receipt of my objections and if there is any prospect of this site being considered further, an indepth reply specifically addressing the points I have mentioned above.

Kind regards

Matt Richardson



**1418**

## Site Allocations DPD: Regulation 19 Consultation Response

**Policy:** SA20

**ID:** 1418

**Response Ref:** Reg19/1418/1

**Respondent:** Ms B Eddington

**Organisation:**

**On Behalf Of:**

**Category:** Resident

**Appear at Examination?** x

<b>Name</b>	Belinda Eddington
<b>Address</b>	[REDACTED]
<b>Email</b>	[REDACTED]
<b>Which document are you commenting on?</b>	Site Allocations DPD
<b>Do you consider the Site Allocations DPD is in accordance with legal and procedural requirements; including the duty to cooperate</b>	Yes
<b>(1) Positively prepared</b>	Sound
<b>(2) Justified</b>	Unsound
<b>(3) Effective</b>	Unsound
<b>(4) Consistent with national policy</b>	Sound
<b>Please outline why you either support or object (on legal or soundness grounds) to the Site Allocations DPD</b>	I object to the site being developed without consideraion for the infrastructure of the srrounding area, in particular, the area is already prone to flooding, and the junction of London road and imberhorne lane is already at capacity during peak times. Further local traffic could gridlock the town already Evidenced when the junction was operating with lane closures. Without proper consideration for a solution to the road capacity, the housing should not be allowed to be built.
<b>If you wish to provide further documentation to support your response, you can upload it here</b>	
<b>If your representation is seeking a change, do you consider it necessary to attend and give evidence at the hearing part of the examination</b>	No, I do not wish to participate at the oral examination
<b>Please notify me when-The publication of the recommendations from the Examination</b>	yes
<b>Date</b>	07/08/2020

## Site Allocations DPD: Regulation 19 Consultation Response

**Policy:** SA20

**ID:** 1419

**Response Ref:** Reg19/1419/1

**Respondent:** Mr J Sachon

**Organisation:**

**On Behalf Of:**

**Category:** Resident

**Appear at Examination?** x

<b>Name</b>	James Sachon
<b>Address</b>	[REDACTED]
<b>Email</b>	[REDACTED]
<b>Which document are you commenting on?</b>	Site Allocations DPD
<b>Sites DPD Policy Number (e.g. SA1 - SA38)</b>	Sa20
<b>Do you consider the Site Allocations DPD is in accordance with legal and procedural requirements; including the duty to cooperate</b>	Yes
<b>(1) Positively prepared</b>	Sound
<b>(2) Justified</b>	Sound
<b>(3) Effective</b>	Sound
<b>(4) Consistent with national policy</b>	Sound
<b>Please outline why you either support or object (on legal or soundness grounds) to the Site Allocations DPD</b>	<p>I support the development on the basis that a larger development will see greater community benefits than smaller infill developments that have happened over the last 10 years in East Grinstead.</p> <p>I think the only consideration not included is a sum through a s106 payment to support improvements to the a264 and a22 junction.</p>
<b>If you wish to provide further documentation to support your response, you can upload it here</b>	
<b>If your representation is seeking a change, do you consider it necessary to attend and give evidence at the hearing part of the examination</b>	No, I do not wish to participate at the oral examination
<b>Please notify me when-The Plan has been submitted for Examination</b>	yes
<b>Please notify me when-The publication of the recommendations from the Examination</b>	yes
<b>Please notify me when-The Site Allocations DPD is adopted</b>	yes
<b>Date</b>	08/08/2020

1431

## Site Allocations DPD: Regulation 19 Consultation Response

**Policy:** SA20

**ID:** 1431

**Response Ref:** Reg19/1431/3

**Respondent:** Ms D Shelton

**Organisation:** WSCC Estates Team

**On Behalf Of:**

**Category:** Statutory Consultee

**Appear at Examination?** x

**From:** Deborah Shelton <Deborah.Shelton@westsussex.gov.uk>  
**Sent:** 25 August 2020 14:20  
**To:** ldfconsultation  
**Cc:** Eloise Short; Elaine Sanders  
**Subject:** Mid Sussex Site Allocations Development Plan Document (DPD): Regulation 19 Consultation

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

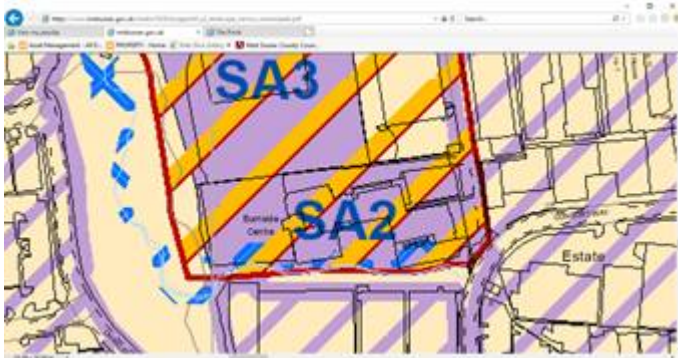
**Categories:** SiteDPD

Dear Sirs,

The comments below are from the Resource Assets Team at West Sussex County Council (WSCC) and are supplied from a landowner perspective. They do not represent the comments of WSCC as a statutory consultee, which are forwarded separately from the Planning Policy and Infrastructure Team.

We have reviewed the proposals put forward in the Mid Sussex DPD Regulation 19 Consultation and wish to add our support to the following designations:

Map 7 (Burgess Hill) Burnside policy SA2 – Employment (in the medium term, 5-10 years):



Map 7a (Burgess Hill) The Brow policy SA16 - Housing and community facilities – including a fire station:



Map 11a (East Grinstead) Part of Imberhorne Upper School SA20 – Housing:



Regards,  
**Deborah**

Deborah Shelton | Asset Management Officer, Asset Management and Estates | Property and Assets Directorate,  
2<sup>nd</sup> Floor Northleigh, Tower Street, Chichester, West Sussex, PO19 1RF Internal: 23950 | External: 0330  
2223950 | Mobile 07541 965663  
Email: [deborah.shelton@westsussex.gov.uk](mailto:deborah.shelton@westsussex.gov.uk)

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1433

## Site Allocations DPD: Regulation 19 Consultation Response

**Policy:** SA20

**ID:** 1433

**Response Ref:** Reg19/1433/2

**Respondent:** Mr R King

**Organisation:**

**On Behalf Of:**

**Category:** Resident

**Appear at Examination?** x



<b>Name</b>	Robert King
<b>Address</b>	[REDACTED]
<b>Email</b>	[REDACTED]
<b>Which document are you commenting on?</b>	Site Allocations DPD
<b>Sites DPD Policy Number (e.g. SA1 - SA38)</b>	SA19 & SA20
<b>Do you consider the Site Allocations DPD is in accordance with legal and procedural requirements; including the duty to cooperate</b>	No
<b>(1) Positively prepared</b>	Unsound
<b>(2) Justified</b>	Unsound
<b>(3) Effective</b>	Unsound
<b>(4) Consistent with national policy</b>	Unsound
<b>Please outline why you either support or object (on legal or soundness grounds) to the Site Allocations DPD</b>	<p>I object to the inclusion of these two sites for the following reasons:</p> <p>There is no shortfall of housing in East Grinstead and the surrounding area, all needs being met by the East Grinstead Neighbourhood Plan. Mid Sussex has agreed to build additional homes for Crawley, an area outside the precepts of East Grinstead and Felbridge. The inclusion will cause a merging of the two areas.</p> <p>Other sites nearer to Crawley have been discarded without full and proper consideration.</p> <p>Infrastructure plan details are vague or non-existent. It is impossible to judge whether anything credible will be delivered (or is in fact deliverable).</p> <p>There is no proposal to address the existing traffic congestion problems. Mid Sussex are aware that traffic has reached saturation point along the A22 corridor but have no proposals to address the issue.</p> <p>The proposal to introduce bus priority along the A22 is vague and if delivered will inevitably cause more congestion for other road users and cause even more delays at the two critical junctions on the A22 (Star and Imberhorne Lane)</p> <p>The development sites are in direct contradiction of the East Grinstead Neighbourhood Plan. The Felbridge site is expressly described as an area of development restraint (policy EG2). Both sites encroach on the gap between the two areas making it likely that they will merge in the future (policy EGa). Developments are supported only where the likely increase in traffic congestion can be FULLY mitigated (policy EG5).</p>
<b>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.</b>	Remove SA19 from the Plan and reduce to capacity of SA20 or remove it completely. This will make the site allocation plan compliant with East Grinstead Local Plan policies and prevent further traffic congestion on the A22.
<b>If you wish to provide further documentation to support your response, you can upload it here</b>	

**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**

27/08/2020

1434

## Site Allocations DPD: Regulation 19 Consultation Response

**Policy:** SA20

**ID:** 1434

**Response Ref:** Reg19/1434/1

**Respondent:** Mr W Byam-Cook

**Organisation:**

**On Behalf Of:**

**Category:** Resident

**Appear at Examination?** x

<b>Name</b>	William Byam-Cook
<b>Address</b>	[REDACTED]
<b>Email</b>	[REDACTED]
<b>Which document are you commenting on?</b>	Site Allocations DPD
<b>Sites DPD Policy Number (e.g. SA1 - SA38)</b>	SA20
<b>Do you consider the Site Allocations DPD is in accordance with legal and procedural requirements; including the duty to cooperate</b>	No
<b>(1) Positively prepared</b>	Unsound
<b>(2) Justified</b>	Unsound
<b>(3) Effective</b>	Unsound
<b>(4) Consistent with national policy</b>	Unsound
<b>Please outline why you either support or object (on legal or soundness grounds) to the Site Allocations DPD</b>	<p>That this site will ultimately coalesce East Grinstead with either Felbridge or Crawley Down due to the absence of clarity regarding the bounds of the SANG provision.</p> <p>Would add additional traffic into a local road network which is already severely congested.</p> <p>Would add to the already over-congested railway line served by East Grinstead.</p>
<b>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.</b>	Don't build the houses in this location.
<b>If you wish to provide further documentation to support your response, you can upload it here</b>	
<b>If your representation is seeking a change, do you consider it necessary to attend and give evidence at the hearing part of the examination</b>	No, I do not wish to participate at the oral examination
<b>Please notify me when-The Plan has been submitted for Examination</b>	yes
<b>Please notify me when-The publication of the recommendations from the Examination</b>	yes
<b>Please notify me when-The Site Allocations DPD is adopted</b>	yes
<b>Date</b>	27/08/2020

1435

## Site Allocations DPD: Regulation 19 Consultation Response

**Policy:** SA20

**ID:** 1435

**Response Ref:** Reg19/1435/2

**Respondent:** Mr R Clay

**Organisation:**

**On Behalf Of:**

**Category:** Resident

**Appear at Examination?** x

[REDACTED]

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**From:** Richard Clay [REDACTED]  
**Sent:** 29 August 2020 09:26  
**To:** ldfconsultation  
**Subject:** Consultation on Mid Sussex District Council's Site Allocations Development Plan Document

As a Felbridge resident, I would like to comment on the Mid Sussex District Council's Site Allocations Development Plan Document and in particular the two sites impacting on Felbridge and East Grinstead, being SA19, Land South of Crawley Down Road (200 properties) and SA20, Land South and West of Imberhorne Upper School (550 properties).

Firstly I note that the Mid Sussex Plan, concentrates the majority of its future housing provision, in terms of housing density, towards the edge of its border with Tandridge. The potential detrimental impact on Tandridge is far greater than for West Sussex, without any clear benefit to Tandridge or its residents.

Both of these proposed developments are far too dense and built on green field sites. They will dramatically alter the look and feel of the areas and increase coalescence, in contravention of development planning policies.

The impact on biodiversity and air quality appear to have been seriously underplayed within the proposals.

Both proposals will have a negative impact on already seriously congested roads and junctions, in particular Crawley Down Road J/W A246 Copthorne Road and Imberhorne Lane J/W A22 London Road. A conservative estimate would suggest 750 extra vehicles using these junctions at peak hours, based on one vehicle per property. Both the A246 and A22 are already busy roads, with frequent queues at the Felbridge traffic lights and the A22 into East Grinstead. The extra traffic will impact negatively on already poor air quality in these areas as a result of the increased vehicle emissions, as well as increased noise.

The increase in traffic will likely cause greater risk to pedestrians, cyclists and other road users, with both developments being close to existing schools.

The supporting infrastructure and local amenities will struggle to absorb this scale of additional housing in such a concentrated area, especially given other recent or proposed developments. The nearest major hospital is East Surrey which is already very busy and local GP Surgeries are over subscribed.

In the event of future droughts, will this additional housing put pressure on the water supply?

There are flood zones close to both proposed developments. Both developments are likely to increase the risk of flooding with less greenfield area to absorb heavy and persistent rainfall as recently experienced.

In summary, I understand the pressure on local authorities in respect of future housing provision, but these proposals will have serious long term negative implications.

Submitted for your consideration.

Richard Clay

1436

## Site Allocations DPD: Regulation 19 Consultation Response

**Policy:** SA20

**ID:** 1436

**Response Ref:** Reg19/1436/3

**Respondent:** Ms M Collins

**Organisation:**

**On Behalf Of:**

**Category:** Resident

**Appear at Examination?** x

<b>Name</b>	Margaret Collins
<b>Job title</b>	Local resident
<b>Organisation</b>	-
<b>Respondent ref. number</b>	-
<b>On behalf of</b>	Myself
<b>Address</b>	[REDACTED]
<b>Phone</b>	[REDACTED]
<b>Email</b>	[REDACTED]
<b>Name or Organisation</b>	Local resident
<b>Which document are you commenting on?</b>	Site Allocations DPD
<b>Sites DPD Policy Number (e.g. SA1 - SA38)</b>	SA18, SA19, SA 20, SA35
<b>Do you consider the Site Allocations DPD is in accordance with legal and procedural requirements; including the duty to cooperate</b>	Yes
<b>(1) Positively prepared</b>	Unsound
<b>(2) Justified</b>	Unsound
<b>(3) Effective</b>	Unsound
<b>(4) Consistent with national policy</b>	Sound
<b>Please outline why you either support or object (on legal or soundness grounds) to the Site Allocations DPD</b>	<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 &amp; 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 &amp; 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>



<b>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.</b>	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.
<b>If you wish to provide further documentation to support your response, you can upload it here</b>	
<b>If your representation is seeking a change, do you consider it necessary to attend and give evidence at the hearing part of the examination</b>	No, I do not wish to participate at the oral examination
<b>Please notify me when-The Plan has been submitted for Examination</b>	yes
<b>Please notify me when-The publication of the recommendations from the Examination</b>	yes
<b>Please notify me when-The Site Allocations DPD is adopted</b>	yes
<b>Date</b>	31/08/2020

1439

## Site Allocations DPD: Regulation 19 Consultation Response

**Policy:** SA20

**ID:** 1439

**Response Ref:** Reg19/1439/2

**Respondent:** Mrs S Dennis

**Organisation:**

**On Behalf Of:**

**Category:** Resident

**Appear at Examination?** x

[REDACTED]

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**From:** Sue Dennis [REDACTED]  
**Sent:** 04 September 2020 17:41  
**To:** ldfconsultation  
**Subject:** Planning applications SA19 and SA 20

Dear MSDC I am writing in response to your proposals for development in the Felbridge area SA 19 & 20 I am a long standing resident of the Crawley Down/Felbridge area and have the following objections:

1.  
This is currently a greenfield site and is a vital nesting area for birds, in particular skylarks. These iconic birds are in rapid decline in England. They are part of our cultural and natural heritage. Their conservation listing is : SPEC category 3 (depleted) with UK: red warning, and they are a priority species on the UK Biodiversity action plan. These are ground nesting birds and are dependent on arable fields for their habitat. Your proposal promises to "Conserve and enhance areas of wildlife value to ensure there is a net gain to biodiversity. Avoid, mitigate and compensate for any loss to biodiversity through ecological protection, enhancement and mitigation measures". I cannot see how houses on this field will do anything other than totally destroy our local population of skylarks. Once their breeding ground disappears, they , and other species such as blackcaps, linnets, hedge sparrows which frequent this area , will be gone forever.

2.  
The gaps between communities and villages in the East Grinstead- Copthorne- Crawley location are are rapidly disappearing, leaving a sprawling coalescence of suburbs, with fewer and fewer green spaces.. The value of the countryside cannot just be measured in economic terms- there is now a raft of evidence that access to green spaces(not just children's playgrounds) is vital for the physical and mental wellbeing of the human population. Neighbourhood plans from the villages affected have highlighted this need for the communities to retain their individual identities.

3. Traffic along the A264 at and around the Felbridge traffic light junction with the A22 is at a standstill on a daily basis. Anyone who lives here will confirm that. The roads cannot cope with any more traffic. Local infrastructure, schools, utilities etc are stretched to their limits already and cannot cope with an expanding population.

For these reasons, I object strongly to the 2 proposals set out above.

Yours sincerely

Susan Dennis (Mrs)

[REDACTED]

[REDACTED]

1440

## Site Allocations DPD: Regulation 19 Consultation Response

**Policy:** SA20

**ID:** 1440

**Response Ref:** Reg19/1440/2

**Respondent:** Mr P Walker

**Organisation:**

**On Behalf Of:**

**Category:** Resident

**Appear at Examination?** x

[REDACTED]

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**From:** Phil Walker [REDACTED]  
**Sent:** 08 September 2020 09:14  
**To:** planningpolicy  
**Subject:** Imberhorne 550 homes & felbrodge

Hello

I live local to these proposed sites which I have just been made aware of through a local resident. I have not received any form of direct information about these developments or signs proposing the sites down Imberhorne or felbridge with a view to consultation. Whilst I agree housing may be an issue as a whole in the south I strongly disagree with the lack of infrastructure that accompanies it, and with regards to the roads around these proposed sites in particular, the a22 and a264 which cannot cope as they are, so I object whole heartedly with these sites. East grinstead as a whole is ruined by traffic, building more houses only adds to the misery for residents. This town needs a bypass or a better road network to ease the pressure on the multiple bottle necks in the area. I suggest building houses on sites away from the felbridge lights, Imberhorne junction and turners hill until a viable traffic plan is established.

Thank you

Philip Walker

Sent from my iPhone

## Site Allocations DPD: Regulation 19 Consultation Response

**Policy:** SA20

**ID:** 1442

**Response Ref:** Reg19/1442/3

**Respondent:** Ms M Baldwin

**Organisation:**

**On Behalf Of:**

**Category:** Resident

**Appear at Examination?** x

[REDACTED]

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**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

**1463**

## Site Allocations DPD: Regulation 19 Consultation Response

**Policy:** SA20

**ID:** 1463

**Response Ref:** Reg19/1463/1

**Respondent:** Ms A Vaughan

**Organisation:**

**On Behalf Of:**

**Category:** Resident

**Appear at Examination?** x



[REDACTED]

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**From:** Angela Vaughan [REDACTED]  
**Sent:** 14 September 2020 21:35  
**To:** ldfconsultation  
**Subject:** Planning at Imberhorne, East Grinstead

I am objecting to this terrible plan. When was the last time you drove around Felbridge lights at rush hour and with the orange cycle way the road lanes are even more reduced and dangerous! Lorries have to squeeze past to get by safely.

How is the road system around the are going to cope with another 750 cars at rush hour, quite ridiculous!! It will be a traffic jam nightmare.

You are also building on a farm where they very successfully grow crops, you will be disposing of our lovely walks and rides and destroying the beautiful countryside.  
The park at the Crawley Down end does not compensate for this loss. Hundreds of people use this facility on a daily basis.

EG does not have a housing shortage, see the neighborhood plan, you know this so why have the options in Crawley not been fully researched and reviewed. It will end up being a housing estate form EG to Crawley with roads full of traffic frustrated and going nowhere fast!

The doctors surgeries, dentists and schools are already at capacity in EG. Are you building new services and infrastructure for the community? There seems to be nothing concrete is the proposal.

Yours sincerely Angela Vaughan.

**1467**

## Site Allocations DPD: Regulation 19 Consultation Response

**Policy:** SA20

**ID:** 1467

**Response Ref:** Reg19/1467/1

**Respondent:** Mr M Rann

**Organisation:**

**On Behalf Of:**

**Category:** Resident

**Appear at Examination?** x

[REDACTED]

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**From:** Mark Rann [REDACTED]  
**Sent:** 15 September 2020 12:52  
**To:** ldfconsultation  
**Subject:** Re land

Dear Sir

I am writing to support NO development on this land in East Grinstead please .  
I walk these lovely fields as do many others it brings peace of mind for many residents

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

I hope this email finds you well

Mark Rann  
[REDACTED]  
[REDACTED]

1472

## Site Allocations DPD: Regulation 19 Consultation Response

**Policy:** SA20

**ID:** 1472

**Response Ref:** Reg19/1472/2

**Respondent:** Mr D Burke

**Organisation:**

**On Behalf Of:**

**Category:** Resident

**Appear at Examination?** x

[REDACTED]

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**From:** [REDACTED]  
**Sent:** 16 September 2020 15:23  
**To:** ldfconsultation  
**Cc:** Kym Hofmann; Ed Kolkin; Alison Kolkin  
**Subject:** Objections to further development in Felbridge and East Grinstead.

The extra traffic generated by more housing in the Felbridge area is unsustainable. See documents that confirm traffic is at saturation point for most of the day.

I am particularly worried about rat runs that already occur, particularly Rowplatt Lane. By its very name it should tell you that it is indeed a lane. And as such much of the lane is only paved on one side. And is not suitable for construction lorries during the build and subsequent extra volume of cars from the new residents.

Indeed recently "unsuitable for HGV" signs have been erected at either end of the lane.

I fail to see how a dedicated bus lane on the A22 would be of any use for commuters as documents state that no employment opportunities exist in East Grinstead. Indeed if Gatwick Airport ever reaches its former size (not before 2024) most employment would be there not in EG.

Finally it's hard for me to believe that Crawley can ask Mid Sussex to sanction the huge expansion in Felbridge and EG because of lack of space in Crawley.

Dirty tricks spring to mind.

Dennis Burke.

1475

## Site Allocations DPD: Regulation 19 Consultation Response

**Policy:** SA20

**ID:** 1475

**Response Ref:** Reg19/1475/2

**Respondent:** Ms B Peterson

**Organisation:**

**On Behalf Of:**

**Category:** Resident

**Appear at Examination?** x

[REDACTED]

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**From:** Becky Peterson [REDACTED]  
**Sent:** 16 September 2020 22:03  
**To:** ldfconsultation  
**Cc:** [REDACTED]  
**Subject:** Argument against planning consent

To whom it may concern,

As a long term resident of Felbridge I have looked at the consultation document for both sites SA19 and SA20.

Firstly Felbridge will receive no financial contributions from either the 120 houses recently granted consent off the Crawley Down Road or for the additional 200 houses in this proposal. Why is this?

The Independent Examiners Report of the East Grinstead Neighbourhood Plan states that to be approved:

*e) The proposal provides a mix of tenure types including private, social rented and shared equity.*

Is this the case, do the plans of both sites include social rented and shared equity?

It also states that the proposal must meet its own infrastructure needs. Our local infrastructure already sorely needs attention as raised by Sir Nicholas Soames when addressing the Minister for planning:

*"I pointed out that we have hosepipe bans, embargoes from sewage authorities, road improvements to the M23 and A23 that have gone backwards and serious potential short-comings in health care and tertiary education."*

Surely if we are struggling to supply infrastructure for our current population, it's clear that this proposal would add unnecessary strain on resources and infrastructure?

It states that in the regard of **Transport issues:**

*application is supported by a robust assessment of the impact of the proposal upon the local highway network and it can be demonstrated that the proposal will not cause a severe cumulative impact in terms of road safety and increased congestion after proposed mitigation is taken into account.*

Sir Nicholas Soames responded to traffic issues: *"I was very disappointed by the Minister's response. She was badly briefed and seemed to be unaware that in particular the rapid growth of traffic over the last 20 years has caused the most serious strain on existing infrastructure in East Grinstead."*

East Grinstead and surrounding areas, especially Felbridge, supply workforce to the Gatwick area and traffic over the past 10 years has created an overload on our

roads. They are often in need of repair and when this takes place, the whole area can become locked down.

East Grinstead and Felbridge are commuter areas and so this new proposal will cause massive strain and traffic in what is fundamentally country roads supplying the M23 and M25. In conclusion we do not have a road infrastructure that could accommodate this overload.

#### **Access to these sites:**

At the moment the traffic on the A264 and the London Road is horrendous, especially during rush hour. If there is any kind of problem this can come to a standstill. The Crawley down road, which would be the access for SA19, is often blocked during school drop off and pick up.

The access for SA20 would be Imberhorne lane which feeds into the main London road, therefor adding to the huge traffic problems we already have.

#### **Density of proposed housing:**

We will need at least a two form entry primary school, also what is the provision for secondary education, for what could potentially be 1600 children? This is not mentioned at all. There will definitely be the need for a GP surgery, the planning for which is ambiguous. How will they measure the need for this, there are already waiting times of up to 6 weeks for an appointment with a local GP?

#### **Flooding:**

Flood risk and damage for SA19: *'The Southern boundary of the site borders a watercourse and its associated flood zones. All development shall avoid the flood extent for the 1 in 100 year event + Climate Change allowances and shall include an additional buffer zone.'*

SA20 is very close to this too.

In the report Mid Sussex say that: *'Areas at risk of flooding should be avoided in the first instance.'*

How has this been taken into account?

#### **Sustainability:**

The report quotes:

*'Design development to be resilient to climate change, minimise energy and water consumption and mitigate against flood risk in line with DP 39: Sustainable Design and Construction, DP41: Flood Risk and Drainage and DP42; Water Infrastructure and the Water Environment.'*

Will this really be resilient to climate change with the amount of flooding that we had last year, which will only get worse?

#### **Coalescence with East Grinstead:**



*Planning permission will not normally be granted for*

*a) results in the coalescence of East Grinstead with Crawley down,*

*B) Results in the perception of openness being unacceptably eroded within this area.*

This is a vast open area that is used by huge numbers of the community for running, walking and cycling. It is a breathing space and an area of natural beauty. It provides a wildlife corridor, the fields contain huge biodiversity, including sky larks, bats, snakes and deer. It also includes areas of ancient woodland, some of which has already been destroyed to make way for housing developments in Felbridge.

Also how will these two housing developments not complete the coalescence of East Grinstead with Crawley Down?

**Biodiversity and Green infrastructure:** the report quotes:

*'Undertake an holistic approach to Green Infrastructure and corridors, including biodiversity and landscape enhancements within the site connecting to the surrounding area.*

*• Conserve and enhance areas of wildlife value to ensure there is a net gain to biodiversity. Avoid, mitigate and compensate for any loss to biodiversity through ecological protection, enhancement and mitigation measures.'*

What exactly does this mean and how will this be done?

I don't understand how the biodiversity and wildlife can gain from 500 houses (plus another 320 on the other site), a school, a GP surgery and a playground being built, as well as the pollution from the potential of 1600 cars starting up and travelling around everyday?!

**Contravention of Development Planning Policies and East Grinstead**

**Neighbourhood Plan:**

*(3) In the case of converted buildings, the new use has minimal impact on the openness of the countryside, in terms of the new curtilage, and parking; in the case of outdoor sport, recreation and community uses of land, the proposals support the objective of keeping land open;*

These sites are both huge developments which do not comply with the above at all.

**Impact on local amenities:**

The extra housing would be a huge strain on our local amenities. We have a small park that is already busy with the local school children. If all these extra houses go ahead we could potentially have over 1600 extra children! We don't have enough shops, leisure facilities etc.. in the local area, this could potentially mean up to 1600 extra cars on the road travelling for shopping and leisure pursuits, in an already very busy area.

Finally I would argue that this ~~is~~an area of natural beauty, it certainly qualifies for this explanation from your report:

*'Area of Outstanding Natural Beauty (AONB) – Areas designated to conserve and enhance natural beauty, wildlife and cultural heritage; and to meet the need for quiet enjoyment of the countryside and have regard for the interests of those who live and work within them.'*

This area is extremely beautiful and is enjoyed widely by thousands of local residents of East Grinstead and Felbridge for walking, running, cycling and general well-being. A huge amount of wildlife lives in this area. The Gullege house and track dates back to the 1300's and is certainly local cultural heritage.

I would really appreciate any answers to my questions and comments.  
Please could you let me know how I can keep up to date with any developments.  
Also how can we, as a community, put objections against any of the plans for SA19  
and SA20?

Many thanks,

Becky Peterson

Sent from my iPhone