

Submission to the Mid Sussex Local Plan 2014-2031  
Site Allocations DPD examination  
Inspector's Matters, Issues and Questions Discussion Note

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Appointed by the owners of land at Crabbet Park, Worth

[numbering follows document ID-02]

## **Matter 1 – legal requirements, scope of local plan and duty to cooperate**

### 1.1 Legal Requirements

(i) it is assumed the plan on one level at any rate, meets its legal requirement though what discussion relating to any cooperation with Crawley BC and the proposals for Crawley unmet housing need are unknown to me.

Logically, Crawley's unmet housing need might be expected to be located as near as practicable to the CBC boundaries and its urban facilities as possible so the rationale for meeting this need in East Grinstead, some 5 miles from the Borough boundary is unclear. It is assumed that overspill from other authority areas should not require those so housed to be utterly remote from the areas their housing demands, social connections and work/life arrangements might originate. In other words the mechanism whereby this unmet need satisfies some policy of the recipient authority without apparent regard for the optimum place for those forming the overspill to live, work, obtain services and enjoy their recreation, is not understood and does not appear to have been analysed.

Were this not the case, a large potential mixed use site adjacent to the CBC boundary such as Crabbet Park, could not so easily have been dismissed as unsuitable or undeliverable in assessing candidate sites, nor could a failure to engage with the owners of the land or their representatives have been so evident.

It is worth noting that until 20<sup>th</sup> April 2021, there had been no contact from MSDC with representatives of the Crabbet Landowners for over 2 ½ years.

(ii) in that respect due process does not appear to have been followed in site analysis and selection. Indeed the reasons previously advanced in earlier local plans for excluding Crabbet Park for instance, have been repeated even though in a number of instances solutions have been offered and material advantages in matters such as traffic, have been offered. These are not reflected in the analysis. It is easy to make out that site specific justification has not been provided in any given instance if the basis for the justification sought is nowhere stated or is selectively applied.

It is doubtful if this is within the spirit of what is required or meets the overarching duties imposed.

## 1.2 Scope

It is difficult to see how 543 Jobs per annum (9231 over the plan period) translates into appropriate provision for a planned 16,390 new homes over the same timeframe. Assuming that new home owners are in the main likely to be in the economically active socio-economic group, this seems to be an admission that the jobs are going to be provided elsewhere with consequential outbound commuting. In the case of East Grinstead, there is understood to have been some attrition of employment floorspace due to Permitted Development rights and much of the remaining space is older, cramped and presents logistical difficulties. The A22 is not adequate nor does it lie along an appropriate axis to deal with evolving transport need when clearly the main gravitational pull of employment and motorway network is Crawley/Gatwick.

The spatial strategy ignores the single most obvious site at Crabbet Park in any consideration of strategic allocations in the north of the district adjacent to Crawley. A hierarchy of settlement types specifically within MSD but ignoring any other settlement factor immediately across its boundary warrants challenge. Might this be to do with the prevention of eastwards spread of Crawley as a principle?

(i) the interpretation of some of the 4 main aims seems perverse at very least

(ii) the Soundness of the DPD is accordingly questionable

(iii) SA GEN may well accord with a more selective interpretation that MSDC wishes to achieve but that does not address the wider issues of transparent and objectively balanced assessment.

(iv) SA34-SA38 are on the face it coherent if one ignores or takes as read the inherent 'bias' referred to above.

(v) no comment at this stage.

## 1.3 DTC

(i) as mentioned above, the question of where irt might be most appropriate for Crawley unmet housing need to be located in terms of the work/life balance of those so accommodated, does not appear to have formed any part of the MSDC Sustainability or Deliverability analysis. This requires further examination.

(ii) its seems inconceivable that satisfying the unmet housing need in Crawley could possibly be regarded as optimised in East Grinstead. Has this socio-economic angle been considered at all? I suspect not. Given the overloading of the A264 currently experienced and an out of date traffic

study which as far as I know has not been updated to reflect the additional effects of Crawley unmet need in the East Grinstead area, the answer to this question is likely to be 'no'.

14<sup>th</sup> May 2021.