

## Inspector's Matters, Issues & Questions (MIQs)

### Matter 3 – Housing – Friday 11 June

#### Matter 3.3: Housing Delivery

***3.3 Housing Delivery over the Plan Period: Does the Plan provide sufficient evidence to demonstrate that the proposed new homes total in each of the allocations can be implemented over the plan period, in accordance with the housing trajectory? Can each of the following housing allocations demonstrate their sustainability and deliverability in relation to the following considerations:***

1.1 Our comments are made in relation to the proposed allocation on land south of Crawley Down Road, Felbridge (SA19) which is anticipated to deliver 200 new homes in the first 5 year period following adoption of the Site Allocations Plan (i.e. 2021-26).

***(i) the willingness (or otherwise) of the landowner(s) to implement their sites on the basis of the relevant policy;***

1.2 Barratt Developments Plc has a controlling land interest over the whole of the allocation site, extending to approximately 8.5Ha (20.4 acres). This includes no.71 Crawley Down Road which will provide access to the wider site. Barratt Developments are a recognised national housebuilder capable of implementing the subsequent planning permission. To this end it is expected that a detailed planning application will be submitted in October 2021 and we are exploring entering into a PPA with Mid-Sussex District Council to facilitate this. On this basis, development is capable of being delivered within the first 5 years following adoption.

***(ii) safe and secure access, which can be provided within the ownership of the allocated site, or does the scheme rely on the acquisition of off-site land;***

1.3 In order to inform the design of a safe means of vehicular access to the site, speed surveys have been undertaken in accordance with Manual for Streets guidance. Based on the results of these surveys sightlines of 2.4m x 59m, to the west, and 2.4m x 62m, to the east, have been used. The resulting indicative layout has been discussed with Surrey County Council Highways who have agreed in principle that it represents an appropriate means of access. In addition, the proposed access has been the subject of a road safety audit which raised no issues.

1.4 The highway works would involve creation of a new 5.5m wide access on the site of 71 Crawley Down Road, with 2.0m footways on both sides. Short sections of new footway are proposed to connect to adjacent bus stops. All necessary works can be carried out on land within the control of Barratts or is within public highway.

***(iii) any conflict with a made Neighbourhood Plan;***

1.5 The site falls within the administrative boundary of East Grinstead Parish Council. The East Grinstead Neighbourhood Plan was 'made' in November 2016 and was assessed against the Mid Sussex Local Plan (2004), the statutory development plan at the time.

1.6 It is acknowledged that the site currently falls outside of the current adopted settlement boundary and so is subject to policies EG2 (Areas of Development Constraint) and EG2a (Preventing Coalescence) however with the adoption of the District Local Plan (2018) and Site Allocations Plan, there will be a need for the Neighbourhood Plan to be reviewed in order for it to be considered up to date and consistent with the District Council's spatial strategy (which in part is recognised by paragraph 1.5 of the NP).

***(iv) any conflict with national planning policy;***

1.7 The Council's Sustainability Appraisal has undertaken an assessment of the site selection process in accordance with policy set out within the NPPF, specifically in respect to the overarching objectives set out within paragraph 9. This identifies a number of benefits associated with proposed development at the site and that together with the site specific assessment work that has been undertaken demonstrates that there would be no conflict with national policy.

***(v) any significant infrastructure considerations, including vehicular access, traffic circulation and highway and pedestrian safety, flooding, drainage and sewerage implications; are any of these 'showstoppers';***

1.8 As part of our site promotion work, we have had extensive dialogue with both Surrey & West Sussex County Council's, in their role as highway authority, which has led to the assessment methodology being agreed. Based on this and as set out in detail within the accompanying Transport Assessment (which forms part of the examination library for SA19) it is considered that the proposed development would have a negligible impact on the operation of the highway network. Furthermore, the proposed development provides an opportunity to improve public transport services in the local area. Improvements would include the funding to upgrade nearby bus stops near the site with real time information and contributions towards providing a new bus lane southbound along the A22 to give bus priority to East Grinstead (the scheme of which has already been designed). A safety audit of the proposed means of access has been carried out which demonstrates that a safe access can be provided whilst there are no other highway safety issues associated with development at the site.

1.9 A number of potential sources of flooding have been considered with the probability of any likely impacts assessed. The nearest watercourse to the site is Felbridge Water which runs along the southern east boundary of the development. Whilst parts of the site fall within Flood Zones 2 and 3 all new development will be located within Flood Zone 1 meaning that the site is therefore considered to be at very low risk of flooding from Rivers.

1.10 The West Sussex Strategic Flood Risk Assessment (SFRA) has no record of the site being affected by groundwater flooding whilst the surface water flood map shows that the majority of the site is within the area classed as 'Very Low' risk of surface water flooding (having less than 0.1% chance every year). Southern Water has been contacted so as to ascertain any historical sewer flood data within the area. At the time of writing Southern Water has not been able to provide any evidence to suggest that the site is susceptible to flooding or has any historic flooding caused by failure of local infrastructure.

- 1.11 In terms of managing surface water drainage from development at the site initial modelling based on the site area and scale of proposed development identifies that a maximum of 4,623m<sup>3</sup> of attenuation should be provided in order to attenuate a 1 in 100 year event plus a 40% climate change allowance. We consider that there is sufficient space within the proposed development to ensure that the SuDS solution, likely to comprise of a range of components (e.g. attenuation basins), is of the required capacity to maintain existing greenfield run-off rates. In summary, the site is at very low and low risk of flooding from all sources.
- 1.12 We are aware of an existing foul water sewer which runs along the eastern part of the site. This would require an easement of 6m which has been taken into account in the design development process and does not affect the ability of the site to deliver 200 new homes.
- 1.13 Overall, it is not considered that there are any significant infrastructure considerations that would constitute 'showstoppers' that would prevent development coming forward at the site.

***(vi) any significant impact on the living conditions of neighbouring occupiers, or future occupiers of the proposed development;***

- 1.14 The site largely comprises of three fields to the rear of existing properties fronting onto Crawley Down Road, Oak Farm Place and a sports ground. Through detailed design, the new homes will be set back from the site boundaries with it anticipated that rear gardens will back onto existing back gardens which will ensure that the living conditions for both existing and future residents are protected. No.71 Crawley Down Road will be demolished to facilitate the new access road. There will be sufficient space either side of the new road to allow for new planting which together with the relatively low traffic flows along this road will ensure no adverse impact on the amenity of nearby properties. It is therefore not considered that there would be any significant impact on living conditions caused by the development.

***(vii) any significant impact on the quality of the landscape, e.g. the integrity of any green gaps, and the ecology of the site and the surrounding area, and proximity to ancient woodland;***

- 1.15 The site is not covered by any specific landscape designations and is identified within the Council's Landscape Capacity Study (2007) as having a medium/high capacity meaning this area (LCA08) has a generally lower sensitivity and so therefore capable of accommodating significant allocations of development.
- 1.16 In light of the fact that the site currently comprises of open fields, ecological survey work has been undertaken which considers the potential impact on both site and off-site ecological receptors. In summary, it is considered that the features of ecological interest are located around the site boundaries and so it is readily achievable to develop a sensitive layout which retains and buffers these areas. At this stage, effects of development on designations in the wider area are either unlikely or there are already measures in place to deliver mitigation (e.g. via SANG/SAMM developer contributions). There is no mapped ancient woodland within the site boundary. The nearest area of ancient woodland (mapped on MAGIC as 'The Birches' Ancient Replanted Woodland) lies approximately 50m to the south-east of the site boundary at Leppards Wood and so would not be affected by development at the site.

- 1.17 Furthermore, significant opportunities exist for enhancements to biodiversity, in the form of habitat creation and enhancement measures, provision of additional opportunities for faunal species and by bringing the site into long-term management to benefit biodiversity.
- 1.18 There are a number of trees along the site's northern boundary which are the subject of TPOs however it is considered that given their position the detailed layout of the development is capable of ensuring no adverse impact to these trees.

***(viii) any impact on Conservation Areas, heritage assets or areas of archaeological significance;***

- 1.19 The nearest Conservation Area is within East Grinstead town centre whilst there are no Listed Buildings within or adjacent to the site. There is a Moated site west of Avenue Wood, approximately 100m south east of the site, which is designated as a Scheduled Ancient Monument (SAM ref: 1009904) however given its separation from the site and intervening landscaping means that it is considered that a sensitive new development at the site would not result in any adverse impact on this heritage asset.
- 1.20 It is understood that part of a former Roman Road may cross underneath the North West corner of the site. This will be the subject of archaeological evaluation in due course however it's alignment on the periphery of the site means that it does not adversely impact the ability of the site to deliver 200 new homes should any remains be found.

***(ix) access to shops, schools, health provision and services, community facilities, public transport and employment, i.e. is the location sustainable;***

- 1.21 Crawley Down Road benefits from a footway on the northern side of the carriageway and a footway on the southern side of the carriageway to the east of the site. There is also a well-connected set of public rights of way (PROW) within the vicinity of the site. The Bridleway that runs through the centre of the site provides a link to other public rights of way providing access to East Grinstead to the south east.
- 1.22 Crawley Down Road is relatively flat and is therefore considered appropriate for use by cyclists. Crawley Down Road provides a link to London Road to the east, which has a designated cycle lane located approximately 200m from its junction with Imberhorne Lane. The cycle lane starts within the vicinity of East Grinstead Service Station and extends for approximately 900 metres towards East Grinstead. National Cycle Route 21 is located approximately 1.5 kilometres to the south of the site, which can be accessed via the Bridleway that passes through the site. Much of the route is traffic free and provides a link to East Grinstead to the east and Crawley to the west.
- 1.23 The nearest bus stops to the site are located along the frontage of the site on Crawley Down Road in both the east and westbound directions, within 30m of the proposed site access. These stops are served by routes 281 and 291, each providing hourly connections to a number of destinations including East Grinstead, Three Bridges and Crawley. Further bus stops are also located on Crawley Down Road to the east of the site as well as approximately 850 metres to the north of the site on Copthorne Road (A264).
- 1.24 The nearest rail station to the site is East Grinstead railway station, located approximately 3.5 kilometres to the south east.

- 1.25 The site is well located with respect to a range of the key services. For example, there are a number of schools, including Felbridge Primary School, Imberhorne School, and Whittington College located within two kilometres of the site whilst other day to day facilities (e.g. sports facilities, general store, pub, village hall) are all within a 15 minute walk of the site. East Grinstead town centre is also located approximately 3.5 kilometres to the east of the site, which offers access to a range of facilities including employment, retail, commercial and medical facilities.
- 1.26 The surrounding footpath, cycle and bus network means that residents will be able to access these without relying on the private car. On this basis, it is considered that the site is a sustainable location for new residential development, the good accessibility of this general location being acknowledged by the Inspector considering a recent appeal approximately 150m east of the site (see paragraph 46, PINS ref: [3205537](#)).

***(x) contamination or other ground or stability issues;***

- 1.27 In light of the greenfield nature of the site it is not considered that there would be any contamination issues nor are there any ground or stability issues that would affect development at the site. An appropriate land contamination survey would be submitted in support of a planning application which would establish the likelihood and position of any contamination. Any contamination subsequently found would be removed and the necessary verification report submitted.

***(xi) any other material considerations which could impact on the sustainability of the proposed allocation?***

- 1.28 We do not consider that there are any other material considerations outside of the Council's site selection process which we believe is robust.