

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

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Matter 3 – Qualitative and Quantitative housing delivery

3.1 MSDC has only very recently (20 April 2021) made contact with the agents acting for Crabbet Park landowners. Prior to that and in effect throughout the preparation of the DPD, there was silence and absence of communication for over 2 ½ years and despite a submission being lodged in 2020.

(i) – (iv) MSDC has historically under provided for housing and has been obliged to bring forward a review of the Plan to account for this. The strategic site at Imberhorne Farm, East Grinstead requires an access point over 3rd party land which may not be secured. It assumes that environmental issues with site can be overcome but has not stated how.

There is also a failure of strategy in insisting on major sites being under a legal agreement or option before consideration of 'deliverability' can go forward. This is short sighted and overlooks the positive role a planning authority can play in fostering sit assembly and cohesion or indeed the corrosive effects of continuing negativity and barrier erection towards a particular site.

Yet this approach fails to optimise and simply confers on the developer control for the medium or long term, of rollout and completions according to the profit motive of developer rather than the local need for houses. Placing one's future homes policy in such an arrangement seems questionable.

3.2

(i) the distribution of new homes is not accepted as logical or optimal especially those at East Grinstead which need to be accompanied by a major east-west road improvement. The economic focus of the entire Gatwick Diamond is the Crawley/Gatwick axis with its transport and communication hub. The Plan seems to assume that Mid Sussex (and Burgess Hill/Haywards Heath in particular) is itself the destination of choice rather than being (a potentially subsidiary) part of an adjacent economic powerhouse. This is an apparent predilection or municipal corporatism that underlies the plan.

(ii) analysis of facilities available for local needs in new development in the selection of sites has been inconsistent. Areas which could support on site facilities as part of the development, are in some cases marked down as lacking them. Transport, employment and education facilities furthermore appear to be limited only to those that are already available within MSD with no reference to those available adjacent or in neighbouring authority areas. Issues of traffic, drainage, flooding, affects on heritage assets and so on are rolled out without any real assessment of actual impacts of these for the principle of development. All this is suggestive of another motive such as curtailing adjacent municipality urban spread or perhaps political considerations.

(iii) – (v) – no comment except that infrastructure needs appear to be too inward looking in the IDP and not sufficiently outwardly aware. For instance the Crawley Fastway bus system as a potential extension eastwards is not referred to.

3.3 The plan makes the assumption that allocation equates to orderly delivery and consistent rollout, matters over which the Council have very little control once a site is allocated. Aligning housing rollout with the motives and preferences of major developers only, removes competition; it subcontracts and makes subservient, public interest in housing delivery to private commercial considerations.

3.4 and 3.5. the DPD would be more robust if it took a more positive approach to site allocation and assessment rather than what appears to be a defensive one. Collaborative and 'can do' approaches would materially alter the range and depth of the plan and make it more proof against opportunistic planning incursions because of policy and provision gaps and loopholes becoming apparent.

3.6 The council needs to take a less dirigiste approach to deliverability. Getting a large site together with several landowners requires a long term commitment and careful tailoring, especially vis a vis taxation. A planning authority can take a proactive 'can do' approach or erect barriers by insisting that every nuance of deliverability is covered off, or even be selective by site as to the way in which such considerations fall to be dealt with on a case by case basis. That is why the objective and consistent application of analysis is important to confidence, commitment of resources and so on in bringing land forward and why evident failure to meet this standard or even appearing to be negatively disposed towards a particular location, has such adverse outcomes.

3.7 No comment

3.8 The nature of community cohesion, resilience, self reliance and sense of place have become vastly more relevant since the Pandemic broke out. Simply putting housing where the council may think it is 'least worst' does not address the issue of optimisation which is key to settled, valued (if not actually cherished) localities which by design, layout, inbuilt response to lifestyle choices, multi modal options for commuters but recognising increasing home working, all play out. This is not a criticism of a plan prepared in pre-pandemic times but does need to be addressed now.

3.9-10 No comment.

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