

1. Does the proposed distribution of the additional homes in the allocations in the Plan accord with the principles of sustainable development, particularly as set out in policies DP4 to DP6?

1.1 Settlement Hierarchy

- 1.1.1 Policy DP4 distributes the large part of the district's housing requirement among its three tier 1 settlements of Haywards Heath, Burgess Hill and East Grinstead. The distribution of housing within the District's medium to small villages is significantly lower.
- 1.1.2 Policy DP6 assigns a category to each of the District's settlements according to its size and level of service provision it is considered able to provide. Felbridge is not included within the Council's settlement hierarchy but Policy DP6 provides no explanation for the omission.
- 1.1.3 Felbridge is a small settlement lying mainly in Surrey and straddles the administrative boundaries of Mid Sussex and Tandridge.
- 1.1.4 The Council's treatment of small settlements either side of East Grinstead is inconsistent.
- 1.1.5 Felbridge does not exist as a distinct settlement in either the Council's Local Plan or submitted plan. It has no district councillor representation and is absent from the Council's settlement hierarchy (evidenced by the spatial housing distribution policy DP4).
- 1.1.6 The location of SA19 is in Felbridge although Policy SA11 of the submitted plan lists SA19 as being in East Grinstead (Table 2.5: Sites DPD Housing Allocations) and therefore part of a tier 1 settlement. As a consequence, the Council regard Felbridge as somewhere that is eligible for a significant quantum of housing.
- 1.1.7 By contrast, Ashurst Wood to the south of East Grinstead is listed in DP4 as a tier 3 village, yet there is little to distinguish Ashurst Wood and Felbridge in terms of the infrastructure and services that each can provide. The Council's spatial distribution strategy allocates a significantly lower quantum of housing to its villages.
- 1.1.8 Both Felbridge and Ashurst Wood are connected to East Grinstead by the A22 trunk road with no break in housing between the settlements.
- 1.1.9 Felbridge has a convenience store, primary school, public house and hair salon. Ashurst Wood has all these plus other services such as a butchers, MOT station and industrial park. Google maps show that both settlements are equidistant from the town centre facilities in East Grinstead.
- 1.1.10 The Tandridge settlement hierarchy was published at the end of 2015 but reviewed in 2018 to ensure it was fully up to date and reflected the district's settlements current level of sustainability. The results of this review were published in its Settlement Hierarchy

Addendum ¹ and included in the evidence base for its emerging local plan under reference SBC1.

1.1.11 The Addendum characterises Felbridge as a rural village based on its meagre services and infrastructure ...

4.1.2 Residents of Felbridge rely on neighbouring East Grinstead for services such as healthcare facilities, secondary schools and a train station for day to day needs. The nearest state secondary school is within 1 mile of the settlement boundary, however healthcare facilities, a train station and convenience / retail opportunities lie a more considerable distance from the settlement boundary, particularly for those residents in the west of Felbridge.

4.1.3 The proximity of East Grinstead plays a role in Felbridge's sustainability, but the settlement itself can only demonstrate a basic level of provision and as such is categorised as a Tier 3 (rural) settlement.

1.2 Tandridge Regulation 19 Submission

- 1.2.1 In its regulation 19 submission, Tandridge note that the Mid Sussex submitted plan proposes to extend the built-up area boundary of East Grinstead to incorporate SA19. The plan goes on to describe SA19 as an 'extension' to Felbridge. Tandridge notes that this is contrary to the Mid Sussex Local Plan policy DP13 on coalescence.
- 1.2.2 The strategic sustainability objective underpinning DP13 aims to promote well located and designed developments that reflect the District's distinctive towns and villages, retain their separate identity and character and prevent coalescence.
- 1.2.3 Felbridge has a current population of 532 homes. The allocation of 200 homes under SA19 in addition to the 120 homes recently approved represents a 60% increase in homes within the village. The rapid expansion that is already underway would be further exacerbated by SA19 and would cause inevitable harm to the distinctive character of the village.
- 1.2.4 SA19 is outside the Felbridge built-up boundary towards East Grinstead. SA20 is outside the built-up boundary of East Grinstead towards Felbridge. This narrowing of the existing green gap between the two settlements to such an extent weighs heavily against the allocation sites.
- 1.2.5 The NPPF paragraph 127(d) requires that planning decisions ensure that developments maintain a strong sense of place.
- 1.2.6 The DP13 sustainability objective is both clear in its purpose and supported by national guidance. The allocation of SA19 is demonstrably incompatible with this objective.
- 1.2.7 Tandridge say that their sustainability appraisal concludes that focussing housing on Felbridge is unsustainable with limited gains when compared to the environmental impact

¹<https://www.tandridge.gov.uk/Portals/0/Documents/Planning%20and%20building/Planning%20strategies%20and%20policies/Local%20plan/Local%20plan%2020233/Examination%20library/SBC/SBC1-Settlement-Hierarchy-Addendum-2018.pdf>

and detriment to the settlement.

1.3 Services and Infrastructure Provision

- 1.3.1 Felbridge has no doctor's surgery, pharmacy, dentist, opticians and only a small convenience store.
- 1.3.2 The village's grade II listed primary school is across the border in Tandridge and its proximity to SA19 was an important consideration in the Council awarding the site allocation the highest rating against its 3rd sustainability objective - *"To maintain and improve the opportunities for everyone to acquire the skills needed to find and remain in work and improve access to educational facilities."*
- 1.3.3 However, the Council has not considered the availability of places at the school despite its selection process being guided by NPPF paragraph 94. *"It is important that a sufficient choice of school places is available to meet the needs of existing and new communities"*
- 1.3.4 The village school is widely acknowledged locally to be grossly oversubscribed and for the 2020 intake there were 112 applications for 30 places. This is already set to present a problem in relation to the 120 new homes already approved in Felbridge.
- 1.3.5 As a grade II listed building the school has limited capacity for expansion. While recognising the proximity of SA19 to the Surrey border, the Council's SoCG with Surrey County Council does not identify any cross-boundary issues.
- 1.3.6 The Council's selection process has also awarded the highest possible rating when assessing SA19 its 4th sustainability objective – *"To improve access to retail and community facilities"*.
- 1.3.7 Although the nearest convenience store is within a 15 minute walk from the proposed site, town centre shopping facilities, restaurants, library, theatre and superstore are nearly 4km distant and can only be accessed via the congested A22 corridor.
- 1.3.8 If allocated, Mid Sussex Council will receive all the corresponding infrastructure contributions and subsequent council taxes and there is nothing in the Infrastructure Delivery Plan to improve meagre services in the village.
- 1.3.9 Once again the Council have awarded the highest possible rating when assessing the site allocation against its 14th sustainability objective – *"To encourage the regeneration and prosperity of the District's existing Town Centres and support the viability and vitality of village and neighbourhood centres"*.
- 1.3.10 The Council's recently approved housing schemes in Felbridge for a total of 120 new homes have yet to impact on meagre local services and the already congested A264/A22 junction. Permissions for housing on this scale was similarly unfounded on account of Felbridge's village status.
- 1.3.11 A further 200 new homes in the open countryside of Felbridge will cause substantial harm to the status and character of the village, erode its separate identity and result in a significant increase in private car journeys to access essential goods and services.