

## Q 7.2

### **The Allocations at East Grinstead/Felbridge puts delivery of housing numbers at risk**

Well-resourced attempts have been made to deliver large-scale development of the location between Crawley Down/East Grinstead/Felbridge (in which SA19 & SA20 fall) have failed to deliver. Before housing delivery is once again made reliant on developing this location it is relevant to review why these sites proved undeliverable previously, despite the very extensive resources expended by MSDC, WSCC and the East Grinstead Developer Consortium.

MSDC has not explained what has changed since the last attempt, which would mean that the previously experienced problems no longer impede development of this location. Nothing significant has.

The most recent attempt resulted from the identification of “*a mixed use strategic location west or south west of East Grinstead*” under the West Sussex Structure Plan<sup>1</sup> (WSSP) (2001-2016) which was subsequently carried forward into the defunct South East Plan. Whilst both of these are now history the underlying facts have not changed as they were superseded.

Under the MSDC LDF, the old Mid Sussex Local Plan (revised 2004) was to be replaced in 2010 by a new local plan (Core Strategy - CS). The draft CS relied entirely on the East Grinstead Strategic Location (EGSL) to deliver the required housing numbers. MSDC tried to deliver the EGSL through an East Grinstead Area Action Plan (EGAAP) which they chose to bring forward under the LDF ahead of the CS, against government advice (GOSE). MSDC were warned that of the risk of over reliance on this site under their spatial strategy thus providing insufficient flexibility.

In identifying the EGSL the Structure Plan Examination identified that the location was “*difficult to deliver*” because of constraints at East Grinstead and as a result significant infrastructure requirements were laid down in WSSP Appendix B (under Policy LOC 1, esp Paras 82, 85, 252, 231, 257 and also Policies NE15/NE17/CH3) that the Strategic Location was made contingent on.

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<sup>1</sup> “Though the Plan has no formal status in the current planning system, it remains our strategic policy statement for future development and land-use planning.” WSCC 29 October 2020

## LOC 1 Strategic Development Principles - East Grinstead

- The development must be contingent on:
- the provision of a comprehensive package of transport improvements which, as essential requirements, will:
  - include early provision of a relief road to contribute towards net traffic relief in the town (Policy NE17);
  - reduce traffic congestion in East Grinstead significantly below current levels;
  - provide a high quality passenger transport link to Crawley/ Gatwick which offers a realistic, attractive and convenient alternative to travel by private car; and
  - take full account of the traffic and environmental impacts in both the immediate and wider surrounding areas (Policies NE15 and 17);
- Development should define and enhance the separate identity, character and setting of all settlements and avoid the coalescence of East Grinstead with other settlements.

These requirements were welcomed by MSDC, WSCC and the developer consortium and formed the basis of the EGAAP work.

A great deal of time and work went into drawing up the EGAAP but the environmental, traffic and infrastructure issues could not be resolved and so the EGAAP was abandoned by 2010/11 and as result the replacement local plan (CS) had to be abandoned.

This included a very comprehensive Multi Modal Transport Study that any modal shift towards public transport between Crawley and East Grinstead was unlikely to materialise and that there were no identified proposals that would solve the traffic constraint.

MSDC, WSCC and the developer Consortium assured the Examination in 2001/2 that the full quantum of the EGSL could be delivered between 2008 and 2016. this proved impossible and lead to the planning policy vacuum in Mid Sussex until the second draft District Plan was finally adopted in 2018.

The problems that thwarted the EGAAP have grown worse as no significant traffic interventions have been delivered and a considerable quantum of small sites new housing has been delivered, mostly unplanned.

Relying on the sites SA20/SA19 makes the deliverability uncertain and thus a plan relying on these sites is unsound. It renders in not justified not effective and not in line with national policy.