

Q 3.6 Additional Sites

The quantum of housing that the Allocations DPD seeks to accommodate results from the conclusion of the Inspector considering the draft District Plan at Examination that the draft had failed to take account of the unmet need of Crawley post 2024. This resulted in a modification introducing an uplift of the minimum housing requirement of 876 up to 2023/24 with a step up to 1076 from April 1st 2024, until the end the plan in 2031.

The houses that the Allocations DPD is seeking to allocate are predominantly to meet this under provision in Crawley. Do the proposed allocations at East Grinstead meet this objective sustainably and can they be delivered? I argue they cannot and that to be sound the DPD must provide sufficient flexibility but it does not.

I contend that the site at Crabbet Park which has been being offered to MSDC since at least 2005, instead of being properly assessed in comparison to the defective East Grinstead sites has been dismissed without due consideration in the Site Selection and Sustainability Appraisal process.

On the face of it Crabbet Park could

- provide up to 2500 homes on a balanced mixed use development
- provide a relief road north-south between Pound Hill and Junction 10
- extend and enhance the Fastway system leading to more journeys being made by sustainable transport
- provide foot/cycle routes to Three Bridges
- avoid any risk to Ashdown Forest
- access Crawley services

There are serious risks to the deliverability of the East Grinstead allocations as there are unresolved sustainability concerns. The District Council attempted to resolve these concerns through an East Grinstead Area Action Plan in an attempt to deliver a strategic location west/southwest East Grinstead identified in the WS Structure Plan and SEP.

Most recently it tried to deliver a strategic development to the west/southwest of East Grinstead. The District Council and WSCC worked together with the East Grinstead Developer Consortium and successfully got the identification of a Strategic Location added into the revised Structure Plan in 2004. In doing so the planning and highways

authorities argued that due to the well-established transport constraint at East Grinstead any such development would need to be contingent on the provision of an effective and attractive transport solution. They argued that this would need to be 2,500 homes on a mixed use development in order to fund this. The Examination into the SP was told that the East Grinstead Strategic Location would be completed by 2016.

Subsequently MSDC spent several years working on the SL delivery via an East Grinstead Area Action Plan. It proved impossible to receive the planning issues and in the end the proposal was abandoned. Because the District Council's Core Strategy (Local Plan) relied on the delivery of the East Grinstead SL it foundered and instead of adoption in 2010 Mid Sussex was left with a strategic planning vacuum until the District Plan was finally adopted in 2018.

The Council accepted that it was not possible to deliver strategic or mass development at East Grinstead in 2010/11 and continued to hold that view when the East Grinstead Neighbourhood Plan was developed, examined and then 'made' following a referendum. The Council accepted this when it came to develop the revised District Plan as submitted to the examination. It was only the the Inspector identified that MSDC should have planned to deliver some off Crawley's unmet need that the question of further mass development at East Grinstead was reintroduced. As such none of the background work for the District Plan, notably the Mid Sussex Transport Study had given any consideration to significant development at East Grinstead.

The proposal to keep the level of development at the level proposed in the submitted draft plan and then add an Allocations DPD to accommodate Crawley's unmet need was introduced during the Examination. No work was done to establish whether or not, or how the increased numbers suggested for East Grinstead might be delivered came within the scope of the examination - that was left for the allocations DPD currently being examined.

MSDC has refused to engage constructively about Crabbet Pk which could be delivered quickly if supported by the LPA. It can provide a sustainable location in Mid Sussex to meet Crawley's need by

- providing up to 2500 homes on a balanced mixed use development
- providing a relief road north-south between Junction X and Y
- extending and enhancing the Fastway system
- providing foot/cycle routes to Three Bridges
- avoiding any risk to Ashdown Forest
- avoiding added traffic to the A264/A22 corridor

Crabbet has been wrongly excluded :-

- East Grinstead sites have proven undeliverable in the recent past because of constraints - issues NOT resolved by current proposals
- Additional houses to be allocated thru DPD are to meet Crawley unmet need not catered for in submitted draft District Plan
- East Grinstead will generate additional commuting by car to Crawley
- MSDC have refused to engage constructively with Crabbet during process
- Crabbett could be delivered more quickly as it faces fewer constraints than East Grinstead and these are resolvable unlike East Grinstead
- Could aid traffic in north Mid Sussex/Crawley and M23 area by providing an on site relief road between Pound Hill and Junction 10 M23
- extending Fastway

The Crabbet Park site should be substituted for Sites SA19 and SA20 which are not deliverable on the evidence submitted.

