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2535	2535/1/MM2	Susan Hose		
2536	2536/1/MM2	Michaela Bordessoule		
2537	2537/1/MM2	Andrew Nicol		
2538	2538/1/MM2	Martyn Piddington		
2539	2539/1/MM2	Keith Harding		
2540	2540/1/MM2	Henry Williams		
2541	2541/1/MM2	Ruth King		
2542	2542/1/MM2	Bryan McClusky		
2545	2545/1/MM2	Damien Millns		
2549	2549/1/MM2	Oli Haydon	Barton Willmore	Welbeck Strategic Land II LLP
2550	2550/1/MM2	Christopher Russell		
2551	2551/1/MM2	Richard Jenkinson		
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2561	2561/1/MM2	Vanessa Vine		
2562	2562/1/MM2	Mims Davies MP	Member of Parliament for Mid Sussex	
2564	2564/1/MM2	Denise Letchford		

Site Allocations DPD: Main Modifications Response

Main Modification: MM2

ID: 6020
Response Ref: 602/1/MM2
Respondent: James Baldwin (Chairman, East Grinstead Society)
Organisation: East Grinstead Society
On Behalf Of:

[REDACTED]

From: James Baldwin [REDACTED]
Sent: 23 January 2022 16:51
To: Policy Consultation
Subject: DPD Consultation: East Grinstead Society Submission
Attachments: DPD Consultation Repsonse 2022.docx

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Please see attached.

James Baldwin
[REDACTED]

EAST GRINSTEAD SOCIETY



January 24 2022

We have commented on both the original Draft Plan in November 2019 and subsequent variances the ensuing period to July 2020. Our comments related to both the general context of East Grinstead and three specific sites in the DPD, SA18, SA19, and SA20.

Our overall position is one of extreme disappointment at the lack of recognition of the points made in both our submissions. We note that this reflects the Town Council's position on its comments. We share their concerns that 'the points supported by the local residents as to the provision of road and community infrastructure have not been included in the plan.' In essence, we consider it is vital that the final Plan guarantees adequate developer contribution for the provision of necessary sustainable community infrastructure.

We also wish to stress again our over-riding point of the long recognised issues around traffic congestion and an inadequate local road system. We repeat that SA35 is of particular relevance. This effectively concedes that the developments now proposed in the DPD will cause unacceptable road congestion throughout the East Grinstead area without major road improvements. It identifies the land that should be safeguarded to support the delivery of transport schemes, particularly the A22/A264 corridor upgrades at Felbridge, Imberhorne Lane and Lingfield Road. It goes on to suggest that there will be a need for further consultations between MSDC, WSCC and other relevant parties, presumably Surrey County Council and Tandridge District Council but particularly East Grinstead Town Council.

Considering the long history of the congestion issue and its continuing impact on the issue of development in and around East Grinstead it is wishful thinking in the extreme to offer consultation as a key to unlock the issue without any evidence of any chance of success this time. Thus, until these consultations have taken place, a plan of action agreed and the remedial works commenced it would be imprudent to commence the housing developments envisaged in the DPD. The need for this is underpinned by the results of previous professional assessments such as road traffic surveys.

James Baldwin

Chairman, East Grinstead Society

Site Allocations DPD: Main Modifications Response

Main Modification: MM2

ID: 6190
Response Ref: 619/1/MM2
Respondent: Martin Wiles
Organisation:
On Behalf Of:

[REDACTED]

From: martin wiles [REDACTED]
Sent: 15 January 2022 13:05
To: Policy Consultation
Cc: [REDACTED]
Subject: RESEND : Mid Sussex SA DPD Examination - Main Modification Summary - Comments
Follow Up Flag: Follow up
Flag Status: Completed
Categories: SITES DPD MM

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Dear MSDC,

Concerning the Main Modification Summary – it is not acceptable.

As I have done since the Neighbourhood development plan of 2016 I take issue with the document concerning SA19 (Crawley Down - Felbridge) and SA20 (Imberhorne)

Changes noted

- SA 19 Biodiversity
- SA 20 specialist housing / SANGS / Biodiversity

These changes are wholly inadequate.

They ignore completely the elephant in the room – **Highways Infrastructure.**

Everybody knows in East Grinstead that this is the biggest single problem the town has and the MSDC is totally ignoring this.

I live on Buckhurst Way that exits to London Road A22 East Grinstead and every single day we face gridlock on exiting if by car or choking to death on exhaust fumes if walking up to the star junction
My wife commutes to Horsham and often faces lengthy delays morning or evening at rush hour, queuing sometimes back to Snowhill, frequently made worse by additional / emergency utilities roadworks.

Yet, this consultation has chosen to ignore the obvious probable impact of the 2 proposed developments at Imberhorne and Felbridge in East Grinstead. This is laughable.

Having already participated in the neighbourhood development plan and the recent consultation it has become clear that the transport assessments for all new developments do not take account of the impacts on the local road networks and junctions and just focus on the so called strategic road network.

Why is the MSDC Strategic transport model being ignored and where is the 2018 transport study ?

You are ignoring the warning signs in order to bulldoze through more houses without considering the infrastructure consequences.

If you don't heed these warnings your successors will have an even greater problem in the future.

I am not against the houses , my point is that the infrastructure to handle these developments is totally inadequate today without them, and the proposed Infrastructure efforts from the developers laughable.

Currently MSDC DPD believes that the 2 Felbridge junctions would not be impacted by the 500+200 home developments, this is also laughable. You obviously don't live in East Grinstead.

This is not including

- other smaller developments that are being built by stealth or have been built recently that simply make the traffic problem worse for the town
- additional through traffic as the overall population in the area grows elsewhere with the other developments in North Mid Sussex .

Previous surveys (documented in your consultation and by Infrastructure First who I am sure you know) have identified that these junctions are already at capacity, even over capacity.

You know that but choose to ignore it.

On average each house will add minimum one car to these junctions or probably 2 cars.

Congestion at Felbridge will lead to rat runs on other local roads unable to cope including residential roads leading to increased risk of accidents due to frustrated drivers speeding through.

Worse :

- these junctions are falling apart and badly pot holed.
- Major utilities infrastructure passes already under and is frequently dug up thus creating even further highways congestion on a regular basis and further damaging the already badly pot holed road condition.
- The disruption caused by adding infrastructure from the new developments as well as site traffic will equally massively impact these junctions even if it's temporary.
- The air quality at these junctions is poor, if not dangerous, as a cyclist I regularly pass through and often have had trouble breathing due to the high levels of exhaust fumes all the way along the section from the Star to the speed camera since one side or the other is often at a standstill.

The new developments cannot be justified until a major infrastructure review is carried out

Today this is not sustainable, let alone with such new developments.

Therefore, ignoring the warnings would be totally and wholly irresponsible, and simply putting off the problem for the next generation.

Please take the time to drive through Felbridge to East Grinstead one day and see for yourself.

These developments will have a clear massively negative impact on the local highways.

I don't accept the main modifications document as a result.

Please reject the new developments and improve the existing **highways infrastructure first.**

Thank you

Kind Regards

Martin WILES



Site Allocations DPD: Main Modifications Response

Main Modification: MM2

ID: 6660
Response Ref: 666/1/MM2
Respondent: Julie Holden
Organisation: East Grinstead Town Council
On Behalf Of:

From: Julie Holden [REDACTED]
Sent: 14 January 2022 12:07
To: Policy Consultation
Subject: consultaion response to examiners main modifications
Attachments: EGTC_Letter_Head consultation MM MSDC SA DPD Jan 2022.pdf

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Dear Sirs

Please see attached the response from East Grinstead Town Council.

With best wishes

[REDACTED]



Julie Holden (Mrs)
Town Clerk
East Grinstead Town Council

[REDACTED]



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EAST GRINSTEAD TOWN COUNCIL

Council Offices, East Court, College Lane, East Grinstead, West Sussex, RH19 3LT

Web site: www.eastgrinstead.gov.uk E mail: townclerk@eastgrinstead.gov.uk



Town Clerk: Mrs J W Holden EDMS, IRRV (Hons), Cert HE Comm Gov, PSLCC



INVESTOR IN PEOPLE

Your Ref:

My Ref:

When calling please ask for: Mrs J Holden

14th January 2022

By email to: policyconsultation@midsussex.gov.uk

Dear Sirs

The East Grinstead Town Council wishes to comment on the Main Modifications of the Examiner as published by Mid Sussex District Council in November 2021.

The Council is disappointed to see that many of the points raised in our submissions of 19th November 2019 and 24th September 2020 have not been included by the Examiner. We have grave concerns that the points supported by the local residents as to the provision of road and community infrastructure have not been included in the plan. We do not believe that the plan goes anywhere near far enough to guarantee that investment will be forthcoming from developer contributions to maintain a safe and sustainable community. As the examiner has in effect disregarded previous professional assessments such as road traffic surveys, an understanding as to why this is the case would be expected.

The road systems in and around East Grinstead were acknowledged to be over capacity over 10 years ago, yet many years of piecemeal and continued non planned development contributing numbers far in excess of the original models are now being referred to as not at capacity and further development will not result in severe affects to key junctions. This position is simply unfathomable by this Council and the residents of the town. For all future development It is vital that developer contributions are allocated to approved road improvements and plans and not vague promises of infrastructure which sound good but may never come forward; such as dedicated bus lanes on impractical routes.

To the Specific modifications we would reply as follows;

MM2 / SA20 / MM3– We have concerns as to the requirement for elderly persons accommodation fronting on to the busy and getting busier Imberhorne Lane. As the justification for this must be the availability of access to local services, we do not agree that this will satisfy this as the nearest corner shop is on Heathcote Drive an estimated uphill walk of 20 minutes. The developments should be required to provide an appropriate facility. There are likewise no other community facilities in the area other than a recreation / play area and the school. This requirement in MM2 will be at odds with the requirement of MM3 as it simply will not be satisfied.

MM12 - We do not support this. The policy and amendment will provide for continuation and furtherance of the existing permitted development rules currently in place. The permitted development practices of turning offices in to residential accommodation has had a severe effect on East Grinstead in the past ten years, to the point that the District Council has acknowledged that this has caused concern as to the remaining levels of business premises. East Grinstead town centre cannot absorb the continued loss of business premises which SA34 as amended will support. The amendment does not go far enough as the conditions can be easily satisfied by developers and will simply result in yet further loss of the limited business premises that is left, turning East Grinstead in to a dormitory town with limited sustainable employment offers.

We are supportive of MM13, MM15 and MM22 regarding the biodiversity requirements.

We hope that these comments are helpful, we cannot stress enough to the Examiner that the challenges faced by East Grinstead lead the Town Council and residents to press our concerns to ensure that the District plans and policies spell out and deliver the best deal on infrastructure to accompany development. To ensure the towns retain their sense of community, improving the town for the existing and the new residents.

Yours sincerely

Julie Holden
Town Clerk
East Grinstead Town Council

913

Site Allocations DPD: Main Modifications Response

Main Modification: MM2

ID: 9130

Response Ref: 913/1/MM2

Respondent: James Greene

Organisation: Surrey County Council

On Behalf Of:

From: James Greene [REDACTED] on behalf of Planning Consultations/EAI/SCC <planning.consultations@surreycc.gov.uk>
Sent: 24 January 2022 12:52
To: Policy Consultation
Cc: Planning Consultations/EAI/SCC; Sue Janota; Judith Jenkins; Lesley Steeds
Subject: FW: Mid Sussex District Council Site Allocations DPD: Main Modifications Consultation
Attachments: SCC RESPONSE Draft Site Allocations DPD Main Modifications.pdf

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Dear Sir/Madam,

Please find attached Surrey County Council's response to the Mid Sussex District Council Site Allocations DPD: Main Modifications Consultation.

If you have any comments or queries regarding this response, please email planning.consultations@surreycc.gov.uk.

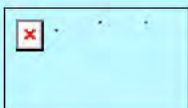
Kind regards,

James Greene
Spatial Planning Officer
Environment, Transport & Infrastructure Directorate



From: Planning Policy - Mid Sussex District Council
<planning.policy.mid.sussex.district.council@notifications.service.gov.uk>
Sent: 29 November 2021 15:00
To: Planning Consultations/EAI/SCC <planning.consultations@surreycc.gov.uk>
Subject: Mid Sussex District Council Site Allocations DPD: Main Modifications Consultation

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Mid Sussex District Council – Planning Policy

29th November 2021

Site Allocations DPD: Main Modifications Consultation

Following hearing sessions held in June 2021, the Planning Inspector appointed to examine the Council's Site Allocations DPD has suggested modifications, which will now be subject to consultation.

The role of the Sites DPD is to set out how the Council plans to meet the District's outstanding housing and employment needs up to 2031. The Sites DPD recommends 22 housing and 7 employment sites at locations across Mid Sussex, plus a Science and Technology Park.

The independent Inspector appointed by the Secretary of State held hearing sessions in June 2021 and heard evidence from all interested parties. Following this the Inspector is suggesting a small number of modifications to the Sites DPD to ensure it meets legal and soundness requirements.

The proposed modifications are now subject to consultation which will run for 8-weeks from 29th November 2021 until 24th January 2022.

The schedule of Main Modifications and accompanying documents are available online at www.midsussex.gov.uk/SitesDPD. The website also provides details on how to respond to the consultation.

Note that comments must be focussed only on the suggested modifications, which are put forward without prejudice to the Inspector's final conclusions. All representations will be taken into account by the Inspector who will aim to provide his final report for consideration by Council early in the new year.

You are receiving this email because you are a statutory consultee, provided comments to the consultation on the document above, or have signed up to receive Planning Policy updates from Mid Sussex District Council. If you would no longer like to receive these updates, please let us know at LDFnewsletter@midsussex.gov.uk

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Email: planning_consultations@surreycc.gov.uk



Planning Policy
Mid Sussex District Council
Oaklands
Oaklands Road
Haywards Heath
RH16 1SS

Environment, Transport &
Infrastructure Directorate
Spatial Planning Team
Surrey County Council



Sent by email to: policyconsultation@midsussex.gov.uk

24 January 2022

Dear Sir/Madam

Mid Sussex District Council Site Allocations DPD: Main Modifications Consultation

Thank you for consulting Surrey County Council on the Mid Sussex District Council Site Allocations DPD: Main Modifications Consultation. We have responded to previous MSDC consultations to express our concerns regarding the potential cross-boundary impacts of proposed new development in Surrey. This response recognises the signed Statement of Common Ground (SoCG) between our two authorities and subsequent changes made to the Site Allocations DPD, however further work is required between our two councils prior to new development being delivered.

Surrey County Council (SCC) supports the proposed modifications to SA19 and SA20, and we welcome both the addition of SEND facilities, on the basis that these would be accessible to families on both sides of the county boundary, and the changes to highways and access issues recognising that the modified policies specify working collaboratively with **and to the satisfaction of both** Surrey and West Sussex County Council Highway Authorities.

However, we would like to draw your attention to concerns raised with elected Members by local residents about the cumulative impact of growth in the area, particularly with regard to pressures on schools and the impact of motorised vehicular movement. The A22/A264 corridor is already suffering traffic congestion, as acknowledged in the SoCG (June 2020), but the increase in motorised traffic arising from development in Mid Sussex and background growth is negatively affecting the character of the area, especially Felbridge.

Furthermore, there have been limited active travel facilities delivered in the Felbridge area to date arising from the developments coming forward in this particular part of East Grinstead, raising a question over what sustainable transport enhancements can be delivered in a timely fashion that will address impacts. We acknowledge that MSDC will have received representations on these concerns when the original Site Allocations DPD was consulted on, and as both SCC and MSDC agreed in the SoCG and as stated in SCC's response dated 28th September 2020, we looked forward to working with MSDC to mitigate the impact of these developments on both the highway network and at Felbridge Primary

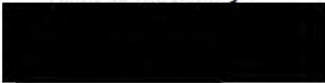
School. Yet in the intervening period, there has not been any offer to work with us on these issues, particularly with regard to detailed modelling of the A22/A264 corridor and neither has any information been shared on the transport assessment work being undertaken by the promoters of the allocated SA20 development site.

Therefore, until such a time as sustainable transport enhancements are delivered and remaining impacts are addressed to our satisfaction along with West Sussex County Council, we recommend that both these sites have Grampian conditions placed upon them preventing the delivery and occupation of housing units.

However, we are considering how we can be proactive in assisting MSDC on the highway and access issues to allow MSDC's housing need and enhanced community, education and healthcare facilities to be delivered at the same time as addressing the concerns of residents and businesses in the area of Surrey. With these objectives in mind, we look forward to working with MSDC.

If you have any queries, please do not hesitate to contact James Greene by email at planning.consultations@surreycc.gov.uk.

Yours sincerely

A black rectangular redaction box covering the signature of James Greene.

James Greene
Spatial Planning Officer

1315

Site Allocations DPD: Main Modifications Response

Main Modification: MM2

ID: 13150
Response Ref: 1315/1/MM2
Respondent: Anne Withecombe
Organisation:
On Behalf Of:

[REDACTED]

From: Anne Withecombe [REDACTED]
Sent: 24 January 2022 11:25
To: Policy Consultation
Subject: New Housing Proposal at Imberhorne

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I have lived in East Grinstead for 53 years and have watched it grow out of control with the current lack of current infrastructure.

With the thought of at least 600 cars to join our roads is ludicrous along with the cars from all other developments. The observations of the powers that be with reference to traffic at the Felbridge Lights are unbelievable, coming from Heathcote Drive on a bad day it can take 20 minutes or more to actually start my journey to Crawley, and one of the reports quoted seeing 4 cars in the queue. Grinstead is occasionally gridlocked from the Mormon Temple, backed up on the link road to almost Ashurst wood, backed up from Crawley Down garage, a nightmare at the junction to get onto the Tunbridge Wells road is unbelievable, many times drivers have done u turns to avoid the problem and travel through back lanes to reach their destination. My road is already a car park for commuters and a rat run if there is a problem on the A22, How much more timewasting in traffic queues are we expected to suffer before a radical change in road layouts are implemented.

A very frustrated Grinstead resident

Anne Withecombe

1417

Site Allocations DPD: Main Modifications Response

Main Modification: MM2

ID: 14170
Response Ref: 1417/1/MM2
Respondent: Matthew Richardson
Organisation:
On Behalf Of:

[REDACTED]

From: Matt Richardson [REDACTED]
Sent: 24 January 2022 08:08
To: Policy Consultation
Subject: DPD Main Modifications Consultation

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Dear Sir / Madam,

Regarding development sites in and around East Grinstead, specifically the imberhorne farm development, although the following points also relate to other proposed developments in the area:

- (1) what plans have been made regarding dealing with the increased traffic through the already overly congested imberhorne lane/a22 and a22/a264 traffic light junctions?
- (2) what plans have been made to reduce / restrict increased traffic on surrounding residential roads (such as heathcote drive, gardenwood road etc) that are and will increasingly be used as cut throughs to avoid the busy a22 junctions mentioned above and increased traffic congestion on the a22 through East Grinstead due to the new developments?
- (3) what guaranteed plans have been put in place for the additional resources required for the already over subscribed medical practices (i.e. additional doctor and dental practices)?
- (4) what guaranteed plans have been put in place for the provision of education (i.e. additional primary and secondary schools)?

I do not believe the above areas have been properly addressed in any amendments of the plans produced, and would like to know how they will, as a matter of priority above any new houses that will be built.

Kind regards

Matthew Richardson
[REDACTED]

1418

Site Allocations DPD: Main Modifications Response

Main Modification: MM2

ID: 14180
Response Ref: 1418/1/MM2
Respondent: Belinda Eddington
Organisation:
On Behalf Of:

[REDACTED]

From: Eddington,Belinda,GATWICK,Finance Specialist Services - BE
[REDACTED]
Sent: 11 January 2022 20:19
To: Policy Consultation
Cc: [REDACTED]
Subject: East Grinstead Housing development at imberhorne farm
Categories: Laura to move

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Dear sir

I am writing to you as a plea to reconsider the proposal for building 750 houses on our beautiful farmland. The site forms part of a looped walk which was one of the first we completed when we arrived in the town in 2014. The reason for my concern is not a case of nimbysism, I think development is a good thing, as long as it is not to the detriment of the local population. The problem with the proposal is twofold:

1. the disregard for the natural beauty and wildlife of the site and
2. The lack of road improvement infrastructure to support the development.

The development would access the road network onto imberhorne lane, at the end of which is our secondary school. My own experience of that junction has been akin to the trials of Hercules in the 7 years I have been commuting between home on the imberhorne estate and my work in Crawley. At commuting time, excluding the pandemic, it can take 25 minutes to get through the traffic lights at imberhorne to London road and then further lights at felbridge. If any road works, accidents, potholes, resequencing of lights occurs, it can double the time to get out of town. There are 3 roads out of east Grinstead to allow access to south London and Crawley, and when one of them fails, the whole town is in gridlock. I have become quite adept at trying the 3 alternative routes, but the problem is the two junctions mentioned above are operating over capacity during peak times. The road system cannot support a development of this size. I implore you to rethink this development.

There is another large housing development site at the opposite end of imberhorne lane already being built, and I can't imagine capacity for those cars let alone a potential further thousand cars going through those junctions. We must have the infrastructure to deal with this level of development. Public transport is not a viable option for workers into Crawley. The routes are slow, infrequent, and eye watering expensive.

I cannot express the pain and stress of getting through those exit routes each morning and I implore you not to carry out 'studies' of traffic flow at the moment during the work from home directives, current traffic levels in no way reflect normal conditions.

Attached is a photo of my son and daughter and friends during a break on a bike ride that will be lost to us and many other families if this goes ahead, and that makes me sad, but my biggest wish is for you to understand the massive impact this will have on those trying to get to work every single day, including the families that move into the development. Without a proposal for improved roads, the development could gridlock the A22 every day, not only affecting our town, but other east and West Sussex towns trying to access London and Crawley.

Other sites that have been suggested for development close to Crawley would not cause this issue, and as I understand it, have been rejected for failing a tick box on distance to town centre. This makes no sense to me and I ask again for you please to reconsider.

Yours faithfully
Belinda Eddington
[REDACTED]





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1433

Site Allocations DPD: Main Modifications Response

Main Modification: MM2

ID: 14330

Response Ref: 1433/1/MM2

Respondent: Bob King

Organisation:

On Behalf Of:

From: Bob King [REDACTED]
Sent: 13 January 2022 12:45
To: Policy Consultation
Subject: Proposed developments at Imberhorne Lane and Land to the South west of Crawley Down Road

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Sirs,

I would like the following points to be taken into account on the above developments, and I would like my comments to be passed onto the inspector.

There are no indications in the proposal about the following:

- Vehicle access to the site whilst under construction and construction worker parking
- The junction at the A264 with the A22 is already over capacity and at peak times the journey time to East Grinstead can be in excess of 30 mins, what is planned to alleviate the additional traffic at this junction and at the Imberhorne lane traffic lights that this development will generate. We now travel to Crawley (which we can access much quicker, than shop in East Grinstead).
- There are already delays at the junction of Crawley Down road and the A264. What plans are there to alleviate this and ensure that traffic can flow effectively
- Rowplatt lane is towards the north west of the site, and runs between Crawley Down road and the A264. This residential road is used by a significant volume of traffic wishing to go West on the A264 (towards Crawley/Gatwick). This proposal will significantly increase this traffic flow because most of the employment areas are to the west. What proposals are there for alleviating this and preventing neighbouring roads becoming a rat run.
- Access between the two site areas will be across the existing bridleway. To be safe, priority should be provided for pedestrians and riders. How do Barratt Homes plan to provide this. In addition how are Barratts planning to provide safe access to walkers and riders during their construction phases, without impeding access.
- Currently both the local Senior and Junior schools are over subscribed. Are Barratt planning to provide additional school places. I do not believe that there is space on the existing school sites to do this and I do not believe that Felbridge, Tandridge or Surrey councils should provide the funding for these additional places which will be taken by Mid Sussex residents of the proposed development.
- By the way, Whittington College, which was listed as an educational establishment in the Barratt's information leaflet, is NOT an educational establishment, it is an assisted living residence.
- There is already a shortage of Doctors surgery and Dentist places within the area. Are Barratts planning to provide additional health care resources

Additionally,

Way back in 2010, a development next to the one now being proposed on Imberhorne Farm for less than a fifth of the houses, was refused on the grounds of highway congestion.

Since then, the Council's own housing figures show that a further 1,783 houses have been built in and around East Grinstead ... which has resulted in a big increase in traffic on our local roads. Even if we disregard the current proposals to allow a further 750, congestion is already set to become considerably worse once the 1,420 houses already in the pipeline are built.

Yet, West Sussex Highways now support the Council's plan to build many more houses with no mitigation at all.

In approving the Oaks development in 2011, the appeal inspector had this to say ...

“There is a recognised problem of traffic congestion in East Grinstead which has been the subject of studies over the years and is accepted as a major constraint on future growth in and around the town. Locally, peak-hour congestion on the A22 leads to the use of Imberhorne Lane as a cut-through to the B2110 and as part of a rat-run through the Imberhorne Estate to the town centre. The lane has a 30mph speed limit which is regularly exceeded and it is used by commercial vehicles, including in connection with a waste recycling facility, as well as cars. The amount of traffic on the lane leads in turn to congestion on it and this, along with rat-running and traffic speeds can only be to the detriment of the safety of local residents and road users.”

In 2017, Mid Sussex assessed potential housing sites as part of the District Plan examination. One of the assessed sites was Imberhorne Farm. At that time the site was REJECTED as unsuitable and the Council recommended that it shouldn't be allocated due to excessive levels of traffic congestion. Their report said ...

“Severe traffic constraints within East Grinstead would limit the amount of strategic development within the town unless significant mitigation is proposed. The site's major negatives relate to the severe transport constraints, which affect all sites in the East Grinstead area.”

Mid Sussex commissioned a strategic transport model in early 2020 and used it as evidence to support the proposed housing in East Grinstead. The model clearly showed that the main junctions at Felbridge, Imberhorne and Turners Hill will ALREADY exceed their theoretical capacity.

Theoretical capacity is deemed to be 100% but it is widely acknowledged that significant congestion starts above 90%.

Even if NO additional houses are added to the 1,420 already in the pipeline, the 2020 model predicts that in the next 10 years the Turners Hill junction will reach 115% capacity, the Felbridge junction 108% and the Imberhorne junction 102%. These are the Council's own figures.

But these figures almost certainly understate the future levels of congestion.

The 2020 strategic transport study report acknowledges that it undertook very little traffic surveying and it doesn't say whether any surveying was undertaken at all in East Grinstead. District-wide traffic surveys are very expensive so the Council relied mainly on general growth assumptions to extrapolate data taken from surveys carried out in 2008!

Of course, the model outputs are supposedly validated using data from automated traffic counters but something has clearly gone awry!

The model based all its future projections on a baseline position assumed for 2017 and calculated that the Felbridge junction was only operating at 73% of its capacity and that an average of 3 cars were queuing at peak times.

Regular road users would immediately recognise this assumption to be ridiculous.

There is however, a detailed study of the Felbridge junction on Tandridge Council's website. This was undertaken in 2018 and although only the executive summary has been made public, it clearly shows that the junction was operating at 106% capacity with an average of 48 cars queuing at peak times. Since 2018, first hand experience shows that the position has worsened.

I would also like to highlight the first hand evidence provided by a different inspector in relation to the 2019 planning appeal for 63 homes along the Crawley Down Road ...

“From the local perspective the traffic queuing eastbound on Copthorne Road towards the traffic lights builds up at peak times and frequently reaches as far back as Rowplatt Lane, about 1 km from the junction,

and sometimes even further. This was observed during the site visit about 5.30 pm on 15 May and is corroborated by a video camera survey undertaken by the Council over the three-day period 17-19 July 2018”

R King



1434

Site Allocations DPD: Main Modifications Response

Main Modification: MM2

ID: 14340

Response Ref: 1434/1/MM2

Respondent: William Byam-Cook

Organisation:

On Behalf Of:

[REDACTED]

From: William Byam-Cook [REDACTED]
Sent: 24 January 2022 15:51
To: Policy Consultation
Cc: [REDACTED]
Subject: Mid Sussex SA DPD MM" Policy SA20 - proposed development of 550 houses South and West of Imberhorne School, East Grinstead

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Dear Sir,

I note that after some back and forth over the last months and years that approval has been given to proceed to planning for 550 new homes on the rural area behind Imberhorne Upper School, off Imberhorne Lane in East Grinstead. This is in addition to 200 more homes accessible from the other side of the fields from Felbridge.

I have yet to see any evidence from the developers that has successfully addressed how these new homes can be built without making the already traffic-clogged junction of the A264 and A22 worse for traffic, particularly at rush hour. There is no scope to widen the lanes here to alleviate junction pressure without a compulsory purchase of all the current houses on one or the other side of the A264 to flatten them. Without doing this, there isn't room to add to the road width. This would cost millions and take years, if indeed even possible.

This was the conclusion of the rejection of a similar scheme of houses 10 years ago. Since then almost 1,800 new houses have been built in and around the East Grinstead area, making the traffic far worse before the addition of the above new homes.

I am incredibly concerned that nothing will be done to alleviate the traffic problems, the houses will be approved, built and by then the developer will have walked away, leaving the council with severe unsolvable problems.

Please can you confirm how the traffic problems will not be made worse by building more houses in and around this area.

Kind regards,
William Byam-Cook

1442

Site Allocations DPD: Main Modifications Response

Main Modification: MM2

ID: 14420
Response Ref: 1442/1/MM2
Respondent: Melanie Baldwin
Organisation:
On Behalf Of:

From: [REDACTED]
Sent: 17 January 2022 17:14
To: Policy Consultation
Subject: Policy SA20

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Dear Sir/Madam ,

I am writing to express my disappointment that the Inspector hasn't responded to our concerns on the sustainability of large scale housing proposals in East Grinstead and Felbridge. It is particularly disappointing that the inspector shares the Council's view that 750 additional homes at Imberhorne Farm and Felbridge will NOT have a severe impact on our local roads. Having lived in the area for 20 years I have found that the traffic passing through the traffic lights at Felbridge and Imberhorne Lane has been causing problems for many years. Rarely do I not sit in a queue if I want to go to and from East Grinstead town centre. I often find myself cutting through side roads to avoid the queues. I am also concerned about the numbers of accidents at the junction of Crawley Down Road and the A264 , mainly caused I believe by peoples frustration at the tail backs.

Back in 2010, the Oaks development next to the one now being proposed on Imberhorne Farm for less than a fifth of the houses, was refused on the grounds of highways congestion. It has only got worse since but it is a fact that is just being ignored. I believe West Sussex Highways withdrew their objection prior to the appeal hearing, in return for extra funding from the developer to re-phase the traffic signals between Felbridge and Imberhorne Lane. If this did happen it had no impact on the queues and traffic congestion.

Since then, the Council's own housing figures show that a further 1,783 houses have been built in and around East Grinstead ... which has resulted in a big increase in traffic on our local roads. Even if we disregard the current proposals to allow a further 750, congestion is already set to become considerably worse once the 1,420 houses already in the pipeline are built. West Sussex Highways now support the plan to build more houses. It makes no sense!

In 2011 when the appeal Inspector approved the The Oaks development his comments were as follows -

"There is a recognised problem of traffic congestion in East Grinstead which has been the subject of studies over the years and is accepted as a major constraint on future growth in and around the town. Locally, peak-hour congestion on the A22 leads to the use of Imberhorne Lane as a cut-through to the B2110 and as part of a rat-run through the Imberhorne Estate to the town centre. The lane has a 30mph speed limit which is regularly exceeded and it is used by commercial vehicles, including in connection with a waste recycling facility, as well as cars. The amount of traffic on the lane leads in turn to congestion on it and this, along with rat-running and traffic speeds can only be to the detriment of the safety of local residents and road users"

In 2017 In 2017, Mid Sussex assessed potential housing sites as part of the District Plan examination. One of the assessed sites was Imberhorne Farm. At that time the site was REJECTED as unsuitable and the Council recommended that it shouldn't be allocated due to excessive levels of traffic congestion.

What I ask has changed?

The report stated *"Severe traffic constraints within East Grinstead would limit the amount of strategic development within the town unless significant mitigation is proposed. The site's major negatives relate to the severe transport constraints, which affect all sites in the East Grinstead area."*

There have been numerous studies in recent years all of which state the roads in the area are already over capacity and likely to get worse.

I could put more facts and figures in this email but the main point is I do not believe that the area can cope in many ways with all this extra development but mostly due to the increase in traffic.

Yours Sincerely
Melanie Baldwin

[Redacted signature block]

1475

Site Allocations DPD: Main Modifications Response

Main Modification: MM2

ID: 14750

Response Ref: 1475/1/MM2

Respondent: Rebecca Peterson

Organisation:

On Behalf Of:

[REDACTED]

From: Becky Peterson [REDACTED]
Sent: 13 January 2022 22:52
To: Policy Consultation
Subject: 750 homes Imberhorne and Felbridge

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To whom it may concern,

I am very concerned about the housing proposal and the terrible traffic congestion and road safety that will affect my community. I live in Rowplatt Lane (my husband's family moved here in 1975)

I work in Lingfield five miles away and it can take me 40 minutes to get to work. This is crazy! Before the pandemic I worked in Brighton, twenty five miles away and it took me 40 minutes to get there! During the pandemic when schools were closed and people were working from home the journey to lingfield took me 10 minutes (I'm an SEN teacher).

We often shop in Crawley over East Grinstead as the traffic is too depressing to sit in. The worst thing for me is the amount of cars that cut through Rowplatt Lane during rush hour at 100mph. I've nearly been hit trying to get out of my car many times and lots of us in the road have sadly lost our cats being hit by cars during rush hour. I worry about my children walking and playing outside along the road.

I would love to move as it makes me sad to see this beautiful village changing so dramatically but unfortunately I can't afford to.

I really hope something can be done to stop this proposal before it's too late.

Yours sincerely,
Rebecca Peterson

[REDACTED]

Sent from my iPhone

1488

Site Allocations DPD: Main Modifications Response

Main Modification: MM2

ID: 14880
Response Ref: 1488/1/MM2
Respondent: Tim Johnston
Organisation:
On Behalf Of:

From: Tim Johnston [REDACTED]
Sent: 24 January 2022 07:58
To: Policy Consultation
Subject: DPD Main Modifications Consultation

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Hi

I believe you have received a response from Infrastructure First (https://eur02.safelinks.protection.outlook.com/?url=https%3A%2F%2Fmcusercontent.com%2F546a4b16f84ae0549d247d64%2Ffiles%2F941f9d20-17ac-1268-7f35-7f23ddc18de4%2FIFG_Representation_Main_Modifications_DPD_Consultation.pdf&data=04%7C01%7Cpolicysconsultation%40midsussex.gov.uk%7C1977bdd0c7e24d2bfbe308d9df0f47cd%7C248de4f9d13548cca4c8babd7e9e8703%7C0%7C1%7C637786078990563711%7CUnknown%7CTWFpbGZsb3d8eyJWIjoiMC4wLjAwMDAiLCJQIjoiV2luMzliLCJBTiI6Ikl1haWwiLCJXVCi6Mn0%3D%7C3000&data=5CTuMYa5oEVwjrgTJIUYeGVQ2cbt7y2OcXiQaK9kcRk%3D&reserved=0)

I would like to reiterate three of the points that they make that I feel are particularly relevant and add one of my own:

Firstly

The up to date residual need is now around 400 homes , however, the main modification version of the DPD still allocates schemes for a total of 1,704 homes. This represents an official oversupply of 907 as at April 2021 ... and using up to date figures, an oversupply nearer to 1,300. The Council's position stated during the public hearings that they do not accept the need for a buffer due to the robustness of their housing commitments

Secondly

Existing traffic issues do not seem to have been considered relevant The Competent Highway Authorities in West Sussex and Surrey and the District Planning Authorities in Mid Sussex and Tandridge ALL recognise and acknowledge the severe traffic problems in Felbridge and East Grinstead. In particular, that the Felbridge junction is already operating over capacity at peak times of the day. Drivers using the A22 corridor into East Grinstead face significant delays during much of the day due to congestion at the Felbridge, Imberhorne Lane and Lingfield Road junctions ... and this is BEFORE the traffic from the 1,400+ homes already committed in and around East Grinstead start to have an impact on the network. Mid Sussex District Council insist that the serious traffic issues are not a reason to resist further large scale housing close to the main bottlenecks; arguing that the severe congestion is an existing situation. They simply say that the DPD allocations SA19/SA20 will have limited practical impact on the already congested network.

Thirdly

The councils have failed in previous commitments on traffic improvements: (1) Synchronisation of signals at Felbridge and Imberhorne Lane junctions were developer funded, which has not happened; (2) Reconfiguration of the Felbridge junction A264 tried but withdrawn; (3) Atkins Stage 3 junction improvements: still no timetable for their implementation Given total failure to deliver existing road improvements, how can councils (or transport authorities) be relied on to deliver any improvements? Relying on future improvements as a condition of granting new development cannot be right as not only is there no guarantee of success, the chance of success seems low based on historic cases. The A264/A22 junction is just too complex with too little space for improvements.

Fourthly

Education has not been considered enough. At the time of writing, the website for one development (<https://eur02.safelinks.protection.outlook.com/?url=https%3A%2F%2Flandsouthofcrawleydownroad.com%2Fthe->

site%2F&data=04%7C01%7Cpolicyconsultation%40midsussex.gov.uk%7C1977bdd0c7e24d2bfbe308d9df0f47cd%7C248de4f9d13548cca4c8babd7e9e8703%7C0%7C1%7C637786078990563711%7CUnknown%7CTWFpbGZsb3d8eyJWIjoiMC4wLjAwMDAiLCJQIjoiV2luMzliLCJBTiI6Ikk1haWwiLCJXVCi6Mn0%3D%7C3000&sdata=qjlrAIRuaR6BonUfGt4HXeELyTetSgOMLsTWBw%2FdLk%3D&reserved=0) still lists Whittington College under local schools, when in fact it is an old people's home. There is clearly no appreciation for the local education situation in any of these developments. Crawley Down village primary school recently expanded (four years ago?) due to increased population from existing housing development, and ALREADY it is oversubscribed with village children travelling out of the village every day for school - adding to the traffic congestion and pollution.

Tim Johnston



1524

Site Allocations DPD: Main Modifications Response

Main Modification: MM2

ID: 15240

Response Ref: 1524/1/MM2

Respondent: Jane Weller

Organisation:

On Behalf Of:

[REDACTED]

From: jane weller [REDACTED]
Sent: 23 January 2022 11:42
To: Policy Consultation
Subject: Site DPD SA19 Crawley Down Road - 200 houses

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Dear Sirs

We are shocked and dismayed that MSDC and the traffic consultant consider that these new dwellings will have no impact on the Crawley Down Road. We have lived at No.51 Crawley Down Road opposite the Felbridge Village Hall for 28 years and have noticed a significant increase in the traffic using this B road. The traffic queues daily now from the Copthorne Road (A264) down past Mclver Close. Exasperated by school parking. These photos were taken at 8.30am on 18th January 2022. We are barely able to get out of our driveway now.

To state that these new homes will have no significant impact on this road is utterly crass and un professional ! Any moron can see it will have a MASSIVE impact on the local area and road Junctions of which Felbridge will take the brunt and the pollution.

In this DPD is an utter farce of mega proportion.

Regards
Mr & Mrs S Weller

[REDACTED]

Sent from [Mail](#) for Windows



[REDACTED]

From: Jane Weller [REDACTED]
Sent: 24 January 2022 06:19
To: Policy Consultation
Subject: Re: Site DPD SA19 Crawley Down Road - 200 houses
Attachments: ATT00001.htm

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Sent from [Mail](#) for Windows

From: [jane weller](#)
Sent: 23 January 2022 11:42
To: policyconsultation@midsussex.gov.uk
Subject: DPD Main Modifications Consultation" - SA19 Crawley Down Road - 200 houses

Dear Sirs

We are shocked and dismayed that MSDC and the traffic consultant consider that these new dwellings will have no impact on the Crawley Down Road. We have lived at [REDACTED] opposite the Felbridge Village Hall for 28 years and have noticed a significant increase in the traffic using this B road. The traffic queues daily now from the Copthorne Road (A264) down past Mclver Close. Exasperated by school parking. These photos were taken at 8.30am on 18th January 2022. We are barely able to get out of our driveway now.

To state that these new homes will have no significant impact on this road is utterly crass and unprofessional ! Any moron can see it will have a MASSIVE impact on the local area and road Junctions of which Felbridge will take the brunt and the pollution.

This DPD is an utter farce of mega proportion.

Regards
Mr & Mrs S Weller

[REDACTED]

Sent from [Mail](#) for Windows



1540

Site Allocations DPD: Main Modifications Response

Main Modification: MM2

ID: 15400
Response Ref: 1540/1/MM2
Respondent: Richard Harreiter
Organisation:
On Behalf Of:

From: Richard Harreiter [REDACTED]
Sent: 16 January 2022 16:21
To: Policy Consultation; [REDACTED]
Subject: Development of land at Imberhorne Lane and Crawley Down Road, Felbridge
Follow Up Flag: Follow up
Flag Status: Completed
Categories: SITES DPD MM

Some people who received this message don't often get email from [REDACTED] [Learn why this is important](#)

Sirs,
I find it incomprehensible that the Inspector appointed to review the application to allow development of the above sites has completely failed in his duty regarding the effect on traffic congestion and other things in the area.

Why is the District & County Councils hell bent on building more homes?

Given that Crawley and its surrounding area have suffered the worst levels of unemployment in the UK due to Covid, who is going to be able to afford and live in these homes?

Covid will, one day, hopefully be a thing of the past and Gatwick will recover to some degree but there will still not be such a need for housing. The loss of flights and therefore employment from Gatwick by British Airways, Flybe, Norwegian, Thomas Cook and Virgin Atlantic (including their Head Office function) together with numerous supporting businesses will not be replaced by the likes of BA Euroflyer, Vueling or Wizz Air (the latter two with all or mainly foreign, crews). The Cargo business through Gatwick has dropped so far the vast majority of airline freight is assembled at Heathrow and trucked to airside Gatwick without needing any warehouse (and therefore staff) functions.

The Road Infrastructure

It appears that numerous reports identifying traffic congestion problems at the A22/A264 and A22/Imberhorne Lane junctions dating back over 20 years, have all been ignored by the Inspector and the District Council in their haste to approve the building of more homes. More homes bring more vehicles and, if like me, those new residents are unable to walk to the nearest bus stop, then further congestion will obviously occur. Has the inspector, the District or County Council even witnessed the traffic problems, particularly when pupils are being dropped off at, or collected from, Felbridge School. More traffic from new homes will without doubt, increase the risk of an accident occurring by the school and I could not live with that on my conscience, can the Inspector or Councillors?

Has the Inspector or Councils measured the traffic levels at the A22/A264 and A22/Imberhorne junctions when normal traffic loads are occurring? Covid reduced traffic volumes dramatically as people stayed at home. If the developer / Council claim homes will be needed as Covid subsides and jobs are restored, then the traffic congestion will return. Add to that the proposed developments and it will become gridlock.

It has been mooted that the developers intend to place bollards across Gullede Ln near the sports field and tennis courts to prevent "rat-run" vehicles. If true, the developers obviously recognise that such vehicle are undesirable and a problem yet are happy to blight the rest of us. It is also alleged that an unfettered vehicular right of way exists along Gullede Lane for those residents of the farm which bollards would be in breach of. Gullede Lane is a beautiful safe walk for adults, children and pets which given the number of cars that would have to traverse it to exit the development, would cease to exist.

As a family, we no longer visit East Grinstead unless we have no other option and then route via Crawley Down, Turners Hill and Saint Hill because of the congestion at the A22/A264, A22/Imberhorne Lane and A22/Lingfield Rd

junctions. It is much easier to visit Crawley or better still, make a full morning or afternoon of it and go to Guildford or Kingston. We are fortunate enough to live in an estate between the A264 and the Crawley Down Rd where there is no vehicular public right of way. No matter, as soon as there is the slightest hold up at the A22/264 junction, vehicles start streaming through our single lane roads at ridiculous speeds. On one occasion, a 40ft articulated lorry became stuck with the estate because its satellite navigation unit said it was a route option. On another occasion, those residents manning the manual entrance gates at the A264, stopped over 240 vehicles from trying to use the estate roads as a rat-run in a two hour period. Some drivers tried to bribe residents to let them through; others were abusive and threatening and tried to force their way through. Eventually, the Police had to be called. When the houses were built on the old garden centre on Crawley Down Rd, the workmen consistently drove through our estate to buy their lunch and fuel at the A264 Shell garage. The residents of the estate are now funding the fitting of electric access control at a cost in excess of £30,000 because nothing is done by the highways agencies to mitigate the "rat-run" traffic – just to make it worse. The town councils desperately want us to stop internet shopping and support local shops. How can we when one cannot get to the town centre without sitting in a traffic jam or using a bus service which requires a long walk at one end.

Has the Inspector/Councils bothered to see the state of the roads in the Crawley Down area? Hophurst Hill continually has deep and dangerous potholes caused by the overly large busses and Tipper Trucks using such a small road. If these developments go ahead, the speeding tipper trucks, of which there will be many hundreds, will heavily damage the Crawley Down Road/Hophurst Hill. If the Highways Agency/Council cannot maintain them now, what chance in the future?

The Services

It is almost impossible to get an appointment at the Crawley Down Surgery and the Felbridge School is at saturation point. Where are the children of the new home owners planning to enrol their children or seek medical care? The continued rise in energy costs will only increase if demand increases which will happen if more development continues. During hot summers, we are immediately told to reduce water usage or water rationing will be implemented. If the water companies cannot supply the current property levels, how can they hope to service the new builds?

The Environment

The River Fel, as it passes over Gulledge Lane, looks polluted enough. What will it be like when careless builders working for uninterested developers, accidently allow chemicals and oils to enter what is now just a stream while they build the houses? The oil run-off from new tarmac roads alone will be huge. The new home-owners will, no doubt, use weed killer on their gardens and shampoo to wash their cars – all of which will head to the lowest point – the River Fel or stream. Where does that water go? It enters Furnace Lake and Hedgecourt Lake where it will no doubt, poison the fish and other species.

The History

Felbridge or Feltbrugge as it was known in 1200c, has survived many changes throughout time. The track Chapman's Lane (known as Imberhorne Lane but now crosses the road of that name dates back to the Bronze and Iron Age 2300BC – 43AD) continuing along the ridge between Imberhorne Farm and Gulledge Farm and on to Hophurst Farm along what was Kiln lane. Not only will these developments destroy much of that history but within the words "...along a ridge...", there is a clue. The ridge is "high and dry" and was used as a cart track. The fields being planned for development are wet and totally unsuitable for their intended use.

Please think again before destroying this beautiful area just to increase Council Tax income and developer's profits. More and more people are moving away because of the traffic problem and nothing is done about it year after year after year.

Yours faithfully

Mr Richard Harreiter

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1604

Site Allocations DPD: Main Modifications Response

Main Modification: MM2

ID: 16040

Response Ref: 1604/1/MM2

Respondent: Henry Powell

Organisation:

On Behalf Of:

From: henry powell [REDACTED]
Sent: 23 January 2022 19:25
To: Policy Consultation
Subject: East Grinstead 750 extra homes plan

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Dear Sirs

Having received the latest information from Infrastructurefirst regarding the proposal to build an additional 750 homes in the East Grinstead /Felbridge areas

I would like you to pass on our views to the inspector prior to a decision made made.

As a resident of Crawley Down Road in Felbridge I can not comment regarding the Imberhone Farm proposal as it is an area I do not normally access but fully agree with other residents that it will generate a lot of extra traffic on to the junction with the A22 which is already a monumental traffic jam at most times with so many people using Imberhone Lane as a short cut to try to reach East Grinstead town rather than being stuck on the A22 or to access the local Rubbish Tip.

We already try to evade going into East Grinstead town centre whenever possible due to the difficulty of access via the A22 and rather visit Horley or Crawley which have much better car parking facilities and shops. If traveling South or East we use the roads leading via Turners Hill.

Regarding the proposed development in Crawley Down Road , whilst we have not opposed recent developments as new homes have to be sited in the area we believe this new proposal to be completely illogical and unacceptable and find that will not only this create utter chaos in the surrounding roads but will cause continuous traffic hold ups as well as being unsafe.

Creating 200 new homes at the proposed locations with only one access point is also very dangerous considering that it also crosses a very busy and well used pedestrian only lane used by the many local walkers with their dogs, riders on horseback and children accessing the area from the local secondary school at Imberhone Lane. Most dog walkers free their dogs once they have entered either the football field or the lane and this would be impossible with cars moving across the lane.

How can it be safe for users and their animals when the majority of the new homes cars have to cross the path in both directions at different times of day ?

Assuming that their vehicles can gain access to Crawley Down Road , the only two options are to either go past the school and village hall or turn left and turn into the very busy Rowplatt Lane which as well as being not suitable for large vehicles is only wide enough for one vehicle in either direction because the home owners park their cars on the road. Both the school and village hall are very busy with the road only being usable single line which also happens in the other direction when football or bowling is being played by locals and visiting teams.

In conclusion, a new up to date assessment of the traffic and road usage should be made which will prove without any doubt that whilst there is scope for a much smaller additional development of 50/70 homes to be approved the proposed over development is totally unacceptable and dangerous to the community.

Yours Sincerely
Henry Powell
[REDACTED]

1648

Site Allocations DPD: Main Modifications Response

Main Modification: MM2

ID: 16480

Response Ref: 1648/1/MM2

Respondent: Joy Hill

Organisation:

On Behalf Of:

From: Joy Hill [REDACTED]
Sent: 24 January 2022 12:59
To: Policy Consultation
Subject: Re DPD Main Modification Consultation

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43 Dorset Avenue, East Grinstead RH19 2AD

Dear Sirs

I am writing to support Infrastructure First Group's response to the above.

The proposals simply do not deal with the existing traffic congestion and severe traffic problems in Felbridge and East Grinstead. Traffic on the A22 is frequently at a standstill and generates heavy pollution which significantly affects residents living on London Road. Exhaust fumes are toxic, particularly from stationary vehicles with the engine running and are a contributing factor to dementia.

However, the lack of health and education facilities are additional reasons to not proceed - the town simply cannot support this number of additional residents.

These proposals need to be rejected as they are fundamentally unworkable.

Yours faithfully

Joy Hill

[Sent from the all-new AOL app for iOS](#)

1686

Site Allocations DPD: Main Modifications Response

Main Modification: MM2

ID: 16860

Response Ref: 1686/1/MM2

Respondent: David Stow

Organisation:

On Behalf Of:

From: David Stow [REDACTED]
Sent: 24 January 2022 14:00
To: Policy Consultation
Subject: DPD Main Modifications Consultation

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Dear Sir/Madam

I am writing to express my disappointment at the MSDC's Site Allocations Main Modifications Consultation.

It is fairly clear that MSDC have chosen to ignore the blindingly obviously traffic issues which already affect the A22/A264 junction and their apparent position that "things are already bad, it doesn't matter if we make them worse" beggars belief. It is also perverse that having conducted a traffic survey in this area they have claimed that the detailed analysis of this survey was not available in time for the Site Allocations enquiry so was not relevant. That this has been published by a neighbouring authority and undermines MSDC's previous traffic survey, which flew in the face of the daily reality experienced by those living in this area, simply shows the mendacity of MSDC's position.

It should also be noted that traffic improvement schemes required to be implemented as a condition of previously approved developments have not been delivered. This immediately casts in to doubt whether any other infrastructure improvements discussed/required for developments now being proposed will actually be delivered. As a general point of principle developers should be required to implement promised/required infrastructure improvements ideally before commencing work on the developments to which they relate and certainly no later than contemporaneously with such developments. The simple reality is that it is not just the road infrastructure that is at/beyond capacity in the East Grinstead area, other elements such as doctors and dentists are too.

The site allocations plan was based on an indicated requirement with MSDC's area of 1,500+ homes. This has subsequently been revised down and taking account of developments already constructed/in progress/approved, the requirement seemingly is now just circa 400 homes! Why then are MSDC still intent on pushing ahead with plans to still build 1,500+ homes?

The would-be developer for the homes proposed off Crawley Down Rd in Felbridge held an on-line consultation for local residents before Christmas. This was a complete sham. The developers seemed to only answer their own questions! Questions could only be submitted on-line and there was no dialogue with the developer's representatives. Like several other residents I submitted several questions via the on-line portal, none were addressed. This was simply a box ticking exercise so the would-be developer can say that they conducted a local consultation and all points presented at the live element of the consultation were addressed.

Yours faithfully

David Stow



1723

Site Allocations DPD: Main Modifications Response

Main Modification: MM2

ID: 17230

Response Ref: 1723/1/MM2

Respondent: Joan Roberts

Organisation:

On Behalf Of:

[REDACTED]

From: William Byam-Cook [REDACTED]
Sent: 24 January 2022 15:51
To: Policy Consultation
Cc: [REDACTED]
Subject: Mid Sussex SA DPD MM" Policy SA20 - proposed development of 550 houses South and West of Imberhorne School, East Grinstead

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Dear Sir,

I note that after some back and forth over the last months and years that approval has been given to proceed to planning for 550 new homes on the rural area behind Imberhorne Upper School, off Imberhorne Lane in East Grinstead. This is in addition to 200 more homes accessible from the other side of the fields from Felbridge.

I have yet to see any evidence from the developers that has successfully addressed how these new homes can be built without making the already traffic-clogged junction of the A264 and A22 worse for traffic, particularly at rush hour. There is no scope to widen the lanes here to alleviate junction pressure without a compulsory purchase of all the current houses on one or the other side of the A264 to flatten them. Without doing this, there isn't room to add to the road width. This would cost millions and take years, if indeed even possible.

This was the conclusion of the rejection of a similar scheme of houses 10 years ago. Since then almost 1,800 new houses have been built in and around the East Grinstead area, making the traffic far worse before the addition of the above new homes.

I am incredibly concerned that nothing will be done to alleviate the traffic problems, the houses will be approved, built and by then the developer will have walked away, leaving the council with severe unsolvable problems.

Please can you confirm how the traffic problems will not be made worse by building more houses in and around this area.

Kind regards,
William Byam-Cook

1728

Site Allocations DPD: Main Modifications Response

Main Modification: MM2

ID: 17280
Response Ref: 1728/1/MM2
Respondent: Colin Webb
Organisation:
On Behalf Of:

[REDACTED]

From: Colin Webb [REDACTED]
Sent: 24 January 2022 10:58
To: Policy Consultation
Subject: DPD Main Modifications Consultations

[You don't often get email from [REDACTED] Learn why this is important at <http://aka.ms/LearnAboutSenderIdentification>.]

Dear Sir

I am writing to express my extreme concerns regarding the proposed new housing development at Imberhorne Farm and Felbridge. I live on the Imberhorne estate in East Grinstead and am very concerned about the impact of this development on the surrounding area.

1. The existing traffic bottleneck at the A22 junction with the A264 will surely get a lot worse. This will have a knock on effect on the existing traffic congestion at the Imberhorne Lane/A22 junction. These two areas of traffic congestion have become increasingly worse over recent years, causing severe delays for local residents and the businesses that operate out of the industrial parks off of Imberhorne Lane. What measures are going to be put in place to mitigate these problems?
2. As a local resident I am very concerned about the knock on effect on local residential roads. We have a number of primary schools near us and again the amount of traffic has increased in recent years. Has the issue of road safety and school access been properly addressed?
3. Our local GP surgery announced they were stopping taking new patients a few years ago. Surely an increase in population in the local area is going to have a negative impact on available medical services.
4. I also consider that this development is likely to have a detrimental affect on local wildlife and habitats.
5. Access to the local recycling site at Imberhorne Lane is likely to be effected by increased traffic, has this been considered?

I believe that the cumulative effect of all these issues should put grave doubt on the viability of these proposed developments, particularly with regard to the effects on the local area and existing residents.

Kind Regards

Colin Webb

[REDACTED]

1729

Site Allocations DPD: Main Modifications Response

Main Modification: MM2

ID: 17290
Response Ref: 1729/1/MM2
Respondent: Michael McCarthy
Organisation:
On Behalf Of:

[REDACTED]

From: michael McCarthy [REDACTED]
Sent: 23 January 2022 22:33
To: Policy Consultation
Subject: Felbridge and Imberhorne development

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I am objecting to the complete lack of consideration regarding congestion access and pollution caused by the proposed Imberhorne and Felbridge development

The whole consultation process as usual has been totally skewed.

I am a resident of Furnace Wood and this will impact particularly due to trespass and "cutting through" the private roadways on the estate.

The Felbridge trafficlights junction currently struggles due to traffic with only one main route into East Grinstead.

I would be interested to know when any surveys were undertaken, and if they were, when carried out?

M.J.McCarthy

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1744

Site Allocations DPD: Main Modifications Response

Main Modification: MM2

ID: 17440
Response Ref: 1744/1/MM2
Respondent: Mike Gillies
Organisation:
On Behalf Of:

From: Mike Gillies [REDACTED]
Sent: 24 January 2022 23:20
To: Policy Consultation
Subject: Proposed housing developments in and around East Grinstead

Follow Up Flag: Follow up
Flag Status: Completed

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Dear Sir/Madam

I write regarding the proposed housing developments that are being forced through in and around East Grinstead and Crawley Down. Once again it seems that Mid Sussex Council are turning a blind eye and a deaf ear to all the reviews done over the ensuing years with regard to the dreadful traffic situation that exists around and through East Grinstead. I first came to East Grinstead to live in 1972, working at Biggin Hill Airport, then Blindly Heath. Even back then traffic was heavy leading into East Grinstead at the junction of the Copthorne Road and London Road anywhere from 7am to 9:30am and again from 4pm to 7pm EVERY DAY of the week, it has got steadily worse over the years. I worked at Gatwick Airport until 2007 and came home at 4:30pm 5 days a week and would regularly queue from Snow Hill garages to Felbridge traffic lights. How the inspector and the relevant 'review bodies' can say that traffic is not a problem and will not be made worse by more housing in and around East Grinstead must be in denial of the real world situation. The development company bosses no doubt live many miles outside and away from our town which is already blighted by choking traffic. Many shops closed pre pandemic due to the difficulty of getting into the town from 'outside'. We are a town of charity shops and coffee shops, it being easier to just go to Crawley. There is no way to improve the junction at the Felbridge traffic lights, there is no room, no land to take to expand the road layout, this has been pointed out on several reports in the past, reports organised by the council and independent reports. The doctors surgeries, Dentists, schools are full to overflowing already and have been for years, so how are the master minds in the 'planning' department going to handle this while waving through another 700 plus houses in the area, its absolute madness. Have they tried to get off the M23 at the East Grinstead turn off slip road from around 4pm onwards? traffic queues right back onto the motorway, and the other side of the roundabout at the top of the sliproad, traffic coming out of Crawley queues right back to the roundabout at the bottom of the bypass (roads leading to Crawley town and three Bridges) . THERE IS NO MORE LAND to take to expand and improve the road links so we, the residents will be left to put up with choked roads as traffic 'rat runs' through all the side roads to get round London Road. I live off Gardenwood road and twice a day the road is full of rat run traffic trying to get around London Road. So, who is right, the people who live here and know the real situation, or the 'planners' shining the seats of their chairs in the office.

Anyway, why is good farmland being sold off to housing when we should be growing more of our own food to help cut down our 'carbon footprint' by not importing food from thousands of miles away, food that can be grown in the UK. Maybe one day we will get some people in charge who really knows what they are doing, I won't hold my breath, better have a party instead!

Regards
Mike Gillies
[REDACTED]

(Do give me a call and tell me I've got it all wrong)!

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1745

Site Allocations DPD: Main Modifications Response

Main Modification: MM2

ID: 17450
Response Ref: 1745/1/MM2
Respondent: Paul Bennett
Organisation:
On Behalf Of:

From: Paul Bennett [REDACTED]
Sent: 23 January 2022 20:21
To: Policy Consultation
Subject: Felbridge congestion

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I live on the [REDACTED] near to the Imberhorne Lane junction. The A22 is constantly busy and has only got worse in the 28 years that I have lived here.

The road is in an appalling state with potholes that are being repaired all the time, the BBC use a video of the junction as one of their stock images when potholes are discussed in the news. The whole carriageway is failing which results in lorries sounding like thunder as they go over the uneven surface.

Ten years ago when the Wickes store was granted permission the traffic consultants paid for by Wickes said that by traffic management congestion would drop by 40%, I did question the planning committee at the time that if the congestion did not improve would the store be closed.

Something needs to be done as from Purley to Eastbourne the only town that the A22 goes right through with houses either side of the road is East Grinstead. There is a by pass for every other town except us.

I cycle to East Grinstead most times it is so much quicker, but in the last year we lost the cycle lane southbound and there has never been a northbound cycle lane. With the road being so narrow lorries go past you with inches to spare. If the Imberhorne School takes all the pupils from the Windmill Lane school the congestion will only get worse during the rush hour

Paul Bennett

1750

Site Allocations DPD: Main Modifications Response

Main Modification: MM2

ID: 17500
Response Ref: 1750/1/MM2
Respondent: Raymond Hutton
Organisation:
On Behalf Of:

[REDACTED]

From: Raymond Hutton [REDACTED]
Sent: 17 January 2022 20:24
To: Policy Consultation
Subject: Proposed 200 houses south of Crawley Down Road

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[REDACTED] With reference to the above, i live next to the [REDACTED]
[REDACTED] One of my concerns is that the amount of traffic that already uses this road to avoid Copthorne Road traffic in peak times . Also this is not taking into consideration the amount of extra traffic we will receive when the new houses down this road are occupied shortly. As we live next to the [REDACTED] cars etc use it as a short cut occasionally to get to Imberhorne Lane I am concerned this will increase, the Bridle Way is used frequently by horses,, cyclists dog walkers and families , also affected will be the wild life deer etc in the field behind us. I would appreciate that you would give this some serious consideration Yours Sincerely. Mr Rd HUTTON.

1754

Site Allocations DPD: Main Modifications Response

Main Modification: MM2

ID: 17540

Response Ref: 1754/1/MM2

Respondent: John Benstead

Organisation:

On Behalf Of:

From: John Benstead [REDACTED]
Sent: 24 January 2022 13:45
To: Policy Consultation
Subject: DPD Main Modifications Consultation

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Sirs,

The text of this email is also sent as an attachment.

DPD Main Modifications Consultation

I am aware that Mid Sussex District Council (MSDC) needs to prepare a Site Allocations Development Plan Document (Sites DPD)

I followed the Hearings in June 2021 regarding MSDC's Plan. Unfortunately, the Inspector in his report does not seem to have included some of the arguments put forward by objectors to the MSDC Proposals. The Inspector has now suggested modifications to the Sites DPD.

Further consideration must be the adverse impact of the Mid Sussex DPD Plan policies SA19 and 20 upon Felbridge and local roads. It is not made clear in any of the reports that The Felbridge junction contains the meeting of boundaries between Tandridge DC and MSDC. Indeed some 75% of land that may be defined as junction is within Tandridge. Has there been a failing to consult, or a failing to agree between these two authorities.

Several study reports on roads within East Grinstead have been commissioned in recent years. Two of which refer to the Felbridge junction - Atkins and Jubb. Every report has addressed issues which have been reviewed by MSDC. Since I have been monitoring MSDC activities no significant action has been taken to alleviate the congestion set against an ever-rising density of traffic, on the A22 and A264 and related roads.

There are traffic impacts that the proposed site allocations in East Grinstead, specifically SA19 and SA20, will have on the A22 Felbridge Junction and adjacent roads. I do not feel that proposed modifications in any way address the need. The Felbridge Junction has existing issues which are known to be severe and to bring sites forward in that immediate area can only add to the severity of the transport issues. Accordingly, significant improvements to the Felbridge Junction are needed.

I am given to understand that West Sussex County Council, in their response to the DPD, noted that no scheme has been identified and also the possibility that the necessary significant junction improvements required at the Felbridge Junction will not be delivered. Only by incorporating such improvements can you hope to gain any support for additional development from the population of East Grinstead.

We who are concerned about East Grinstead are amazed that when MSDC has a housing availability projected as in excess of the Local Plan, you are coming forward at the behest of developers to exceed your targets. If Crabbett Park were to be developed, then this would be nearer to a centre of employment and put less pressure on a road configuration that is already judged as severe. Additionally, the proposals violate the continuing acceptance of maintaining the gap between settlements.

May I remind MSDC that when it was necessary to have a Local Plan supported by the Neighbourhood Plan, The Post Referendum Campaign (a volunteer organisation supported by the East Grinstead population with the purpose of endeavouring to curb the excesses of MSDC unnecessary and unwanted development plans) endeavoured to get its supporters to vote at referendum by supporting the Neighbourhood Plan. This as an aid to MSDC achieving

acceptance of the Local Plan. At least we thought that by having a local plan, MSDC would honour its commitments to it. The Local Plan that came forward sought to prevent the coalescence of settlements that would harm the separate identity and amenity of settlements. The maintenance of this undeveloped gap reinforces the fact that they are separate settlements.

I am therefore objecting to the modifications proposed on the bases:-

- 1. That they do not take sufficient notice of the objections put forward at the hearings.**
- 2. That no firm proposals have come forward to mitigate or modify the Felbridge junction.**
- 3. Previous road congestion and transport plans have been overlooked in terms of extant validity and environmental needs.**
- 4. That the proposals do not take account of the MSDC Local Plan regarding a gap between settlements.**
- 5. That the DPD Plan seeks to over allocate housing development against the established needs of the area as committed to in the Local Plan**

John Benstead



1769

Site Allocations DPD: Main Modifications Response

Main Modification: MM2

ID: 17690

Response Ref: 1769/1/MM2

Respondent: Sarah Bornati-Jones

Organisation:

On Behalf Of:

From: Sarah Bornati-Jones [REDACTED]
Sent: 20 January 2022 18:41
To: Policy Consultation
Subject: Imberhorne Farm

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I am strongly opposed to the proposed development off Imberhorne Lane.

If this development is allowed to go ahead it is going to blight the lives of local residents who already struggle to cope with the sheer volume of congestion on the roads.

Queuing at the Star Inn Junction is inevitable and always has to be taken into account when planning a trip into East Grinstead town centre, as it can take in excess of 45 minutes just to get there. We know this is a very problematic junction because we live with it daily. Road markings were painted (yellow box) to allow queueing cars on Crawley Down Road to pull out onto the Copthorne Road, yet because of the volume of traffic, we still have queues on both roads waiting to pass the Star Inn Junction. On many occasions, I have driven via Turners Hill just to get into town, which sounds ridiculous but at times it is actually quicker to reach the town centre than drive via the Star Inn Junction.

Rowplatt Lane, Crawley Down Road, Imberhorne Lane, and many other residential roads have become a rat race, with drivers exceeding the 30 mph speed restrictions. Being so close to several schools adds to concerns over safety issues.

I do not understand why this site is even being considered for development as clearly back in 2011, the appeal inspector for the Oaks development recognized the problem of road congestion in this area. Since then we have seen numerous developments being built, with others in the pipeline, which have significantly exasperated the problem. It is pivotal the council discloses ALL the latest data and reports regarding traffic impact, congestion, and safety issues as only then a more accurate and informative decision can be made. They are required to do so, so you must insist the council show all the records and evidence so that a fair and unbiased conclusion can be made.

Kind regards,
Mrs. S Bornati-Jones

1780

Site Allocations DPD: Main Modifications Response

Main Modification: MM2

ID: 17800
Response Ref: 1780/1/MM2
Respondent: Pauline Hocking
Organisation:
On Behalf Of:

[Redacted]

From: Pauline Lozoya Hocking [Redacted]
Sent: 24 January 2022 21:20
To: Policy Consultation
Subject: DPD Main Modifications Consultation

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Dear Mike Fox,

I am writing regarding the development of 750 additional homes at Imberhorne Farm and Felbridge. I object to these plans on several grounds including the following:

- There is not an adequate traffic management strategy. The developer appears to be using wishful thinking and has grossly underestimated the costs of road adjustments. Road safety is in jeopardy as drivers will be tempted to use residential streets to avoid the congestion on the main roads.
- The council's own figures demonstrate an oversupply of 907 houses. At a time when we need to protect green space, reduce carbon emissions and reduce air pollution, there is no justification for the extra housing.

I am not a local, but I visit the locality to see friends and join in activities at a local club. The traffic was appalling the last time I visited and I envisage gridlock should this development go ahead. Also, this is a lovely area and any unneeded extra housing is an unnecessary blot.

Warm regards,

Pauline Hocking
[Redacted]

Pauline Lozoya Hocking (Sole Trader)
[Redacted]
[Redacted]
[Redacted]

1794

Site Allocations DPD: Main Modifications Response

Main Modification: MM2

ID: 17940

Response Ref: 1794/1/MM2

Respondent: Andrew Norris

Organisation:

On Behalf Of:

[REDACTED]

From: Andy Norris [REDACTED]
Sent: 24 January 2022 09:55
To: Policy Consultation
Subject: DPD Main Modifications Consultation.

[You don't often get email from [REDACTED] Learn why this is important at <http://aka.ms/LearnAboutSenderIdentification.>]

DPD Main Modifications Consultation - East Grinstead.

Dear Sir/Madam.

I am extremely concerned regarding the responses of Mid Sussex planning on the findings and points raised by Infrastructure First Group regarding traffic issues and access to health and education. East Grinstead is quite unique in terms of its location and layout with very close proximity to Ashdown Forest and the AONB.

Already I have noticed a large increase in 'rat run' traffic through my road as people cut off the main A22 and cut through the Imberhorne estate very often at high speed to try and get ahead of where they were in the queue! It is only a matter of time before someone gets hurt or killed!

With the allocation still being built, and the problems already bad at peak times, it is time to find somewhere else to house these people, who are highly unlikely to be actually working in East Grinstead, thereby adding to the problems.

Kind regards, Mr Andrew Norris.

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1811

Site Allocations DPD: Main Modifications Response

Main Modification: MM2

ID: 18110

Response Ref: 1811/1/MM2

Respondent: John & Caitriona Capp

Organisation:

On Behalf Of:

From: John F Capp [REDACTED]
Sent: 24 January 2022 16:56
To: Policy Consultation
Subject: DPD Main Modifications Consultation

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Dear Sir/Madam,

The following is a direct copy of 'Infrastructure Firsts' response which I fully support. In my own words the Town has sadly lacked ANY improvement in its infrastructure for many many years. We have lived here for 30 years and watched as the housing has increased in and around the town without any road improvements, increased schooling or medical facilities or little improvement in public transport. We see the nice words in planning applications that 'work will be done with local authorities to improve local facilities', how many have delivered?? Getting around town now can be difficult with regular significant congestion at a number of locations. We have seen the introduction of CPZ's that push the 'parking for the station and shops' problems somewhere else, reduced parking in the town, apartments built with insufficient parking pushing more cars onto street parking elsewhere. Does anyone making these decisions live and experience the congestion the town now suffers? All these new houses will clearly add to the issue significantly and need be 'paused' until infrastructure is improved, please.

Before turning to specific modifications, Infrastructure First are hugely disappointed that the Examiner has not responded to legitimate concerns regarding the severe traffic situation in East Grinstead.

1. Existing traffic issues deemed not relevant
2. Impact on residential streets not considered
3. Cumulative impact not assessed
4. Up to date traffic evidence ignored
5. Committed highway schemes not implemented

1. Existing traffic issues not deemed to be relevant:

The Competent Highway Authorities in West Sussex and Surrey and the District Planning Authorities in Mid Sussex and Tandridge ALL recognise and acknowledge the severe traffic problems in Felbridge and East Grinstead. In particular, that the Felbridge junction is already operating over capacity at peak times of the day. Drivers using the A22 corridor into East Grinstead face significant delays during much of the day due to congestion at the Felbridge, Imberhorne Lane and Lingfield Road junctions ... and this is BEFORE the traffic from the 1,400+ homes already committed in and around East Grinstead start to have an impact on the network. Mid Sussex District Council insist that the serious traffic issues are not a reason to resist further large scale housing close to the main bottlenecks; arguing that the severe congestion is an existing situation. They simply say that the DPD allocations SA19/SA20 will have limited practical impact on the already congested network. The Council's position is untenable for two reasons ...

2. Impact on residential streets has not been considered

Firstly the Council ignore the impact of drivers avoiding long queues at junctions by rerouting along residential streets unsuited to through traffic. These routes were not included within the remit of the Strategic Transport Study and therefore not considered. The Competent Highways Authority describes the inevitable increase in rat-running as the result of SA19/20 as 'undesirable'. The Inspector presiding over the appeal for a scheme of 100 houses adjacent to SA20 (APP/D3830/A/10/2142385) was more forthright, in saying that..

"Locally, peak-hour congestion on the A22 leads to the use of Imberhorne Lane as a cutthrough to the B2110 and as part of a rat-run through the Imberhorne Estate to the town centre. The amount of traffic on the lane leads in turn to congestion on it and this, along with rat-running and traffic speeds can only be to the detriment of the safety of local residents and road users."

This was not a recent statement. It was made than 10 years ago when there were nearly 1,800 fewer houses and substantially less traffic on the roads in East Grinstead.

Since that time, the National Planning Policy Framework (NPPF) has been updated to require planning authorities to consider whether impacts on highways safety are acceptable or not. There is no evidence to suggest that the Council

have given ANY consideration to either capacity or safety impacts on parts of the network not covered by their Strategic Transport Study.

3. Cumulative impact has not been assessed

Secondly the Council cannot legitimately dismiss the traffic problems as an existing situation. The National Planning Practice Guidance (NPPG) most up to date advice on Transport Evidence in Plan Making [Paragraph: 03 Reference ID: 54-003-20141010] makes clear that decision makers should “consider the cumulative impacts of existing and proposed development on transport networks.” There are over 8,500 homes committed in the district, many of which are already approved for development. This includes 1,400 in and around East Grinstead alone. None of these have been considered in combination with the allocations in the DPD when assessing the traffic impact. This cannot be correct. A ‘cumulative’ impact is one that increases by successive additions. It is the combined impact of all things added together. Mid Sussex District Council only assess the incremental traffic impact of the DPD site allocations and have therefore not followed the process required by the NPPG. This approach is therefore also in conflict with the 2021 NPPF paragraph 111. It is not sufficient just to assess all the DPD site allocations together ... if ‘cumulative’ is to mean anything at all, its proper interpretation dictates that the DPD allocations need to be assessed TOGETHER with development schemes already in the pipeline. This is the only way to assess the real impact of traffic joining the road network in the future and it is the method prescribed by the NPPG. The Council’s position has striking similarities with the appellant’s case in the Land at Kidnappers Lane Recovered Appeal [APP/B1605/W/14/3001717]. The Appeal Inspector rejected the appellant’s case that the existing situation can be disregarded and reaffirmed that it is the cumulative effect of all expected development which must be taken into account. The Secretary of State agreed with the Appeal Inspector and a legal challenge mounted by the developer was dismissed by the High Court (see Appendix 1 for the salient details). Despite failing to assess the cumulative impact, Mid Sussex District Council confidently say that there is no evidence to demonstrate there would be serious traffic issues in relation to SA19/20. The Council’s own matter statement (msdc-02f-miq-matter-6) describes how the traffic impact of the DPD allocations was assessed on its own and NOT in combination with other committed development. We were greatly encouraged by the Inspector’s question to the Council asking whether “the cumulative impact should be the determining factor in assessing traffic impact?”. The Council’s response reaffirmed the requirement to test a cumulative impact but then described a process in which it wasn’t tested!!

By assigning the very significant quantum of committed development to the Reference Case and comparing the overall traffic impact against the DPD Allocations PLUS the Reference Case; the impact of the committed development was simply factored out of the equation. We were disappointed that the Inspector failed to pick up on this. Notwithstanding the failure to correctly assess the ‘cumulative’ impact, the Council’s Reference Case predicts that all the primary junctions in and around East Grinstead will be operating over capacity. The extent of this over capacity is understated ... not only as the result of baseline junction capacities being under recorded but also due to the committed development tested in the Reference Case NOT being updated to reflect the published commitments to April 2021. There is no obvious justification for this

4. Up to date traffic evidence has been ignored

The Council also, somewhat cynically, refuse to include the most up to date and reliable traffic data for the Felbridge junction in their evidence base. The results from the detailed traffic survey, which they jointly commissioned, were available prior to the regulation 18 consultation and showed that the junction was already significantly over capacity at that time. The Council say that the WSP investigation is still in draft form as no workable junction improvement options have been identified. However this cannot reasonably apply to the underlying traffic survey, which was based on observations at the time and therefore neither sensitive nor work in progress. Surrey Highways, who jointly commissioned the survey have recently released the detailed traffic data into the public domain. In responding to the many calls for the 2018 WSP traffic survey results to be included in the DPD evidence base, the Council simply say in Appendix 9 of the Regulation 22 Summary, that the WSP study is not relevant. A statement that was not reasoned. Once again, we were encouraged by another of the Inspector’s initial questions which asked the Council to explain “the principal conclusions of the WSP study”. In their response (msdc-02f-miq-matter-6), the Council failed to mention the study’s material findings on junction capacity. Instead they said that the WSP study is not required to address the impact of the DPD and therefore of no direct relevance and that no conclusions could be drawn from the study. This is clearly NOT true. Even the most casual observer could conclude that the WSP study found that the Felbridge junction was operating well over capacity as early as 2018. When asked to explain why their calibrated transport model was so wide of the mark when predicting the Felbridge junction baseline capacity, the Council simply say that the SATURN modelling used for the districtwide study had a different purpose to the detailed LINSIG modelling designed for individual junctions. While this must be correct, it must also bring into question the reliability of the model validation.

The Council stopped short of addressing this question! We are therefore left to conclude that the Council simply found the WSP findings inconvenient ... in that they undermined the findings of the Strategic Transport Study relied upon to support the DPD. As a consequence of the WSP traffic evidence being ignored, the District Council along with their Competent Highways Authority are liable to be challenged over not properly validating the transport model. We don’t

know whether the obvious flaws in the Strategic Transport Model disguised an otherwise severe impact on the road network in East Grinstead. But without a 'severe impact' the DPD is not required to deliver any highways mitigation ... which in turn means that any developer funded road improvements are 'nice to have' and not an essential condition of SA19/20 going forward. The Strategic Transport Study does however acknowledge that significant mitigation of the A264/A22 would be required to significantly reduce the congestion at the Felbridge junction and that to be fully effective would require land outside the highway boundary. But if, as usually turns out to be the case, there are no practical or cost effective solutions identified or that there is simply insufficient funding to deliver a solution, then the roads will stay as they are and the traffic from SA19/20 will simply add to the unacceptable levels of congestion and rat-running. For both regulation 18 and 19 consultations, West Sussex Highways acknowledged that local junction improvements may not be deliverable and requested the District Council to update the DPD to reflect this. However, these requests were ignored without explanation.

5. Committed highway schemes have not been implemented T

The following committed highway improvements for the Felbridge and Imberhorne junctions are overdue with little prospect of delivery ...

- Synchronisation of signals at Felbridge and Imberhorne Lane junctions were developer funded and a condition of West Sussex Highways withdrawing their highways objection to the Oaks development in 2011 – Surrey Highways have confirmed that the synchronisation has not occurred due to technical difficulties and is likely to be unworkable as the result of flow interruptions due to bus stops, side roads etc.
- Reconfiguration of the Felbridge junction A264 approach arm for both lanes to turn right towards East Grinstead has been used as mitigation for several large schemes – Surrey Highways do not support this scheme and confirmed that it has been tried before but immediately withdrawn due to an unacceptable increase in collisions.
- In the last 10 years, several large schemes have made substantial contributions towards the cost of the Atkins Stage 3 junction improvements to help offset the impact of additional traffic. These highway interventions have been factored into the Council's strategic transport models since 2013, but West Sussex Highways say that there is still no timetable for their implementation.

To ensure that effective traffic mitigation is actually delivered, we respectfully ask the Inspector to consider making it a condition of approving SA19/20.

Appendix 1 - High Court Ruling re: Residual Cumulative Impact

In August 2014, the planning committee for Cheltenham Borough Council refused a planning application by Bovis Homes in respect of a residential development of 650 homes. This was against the advice of planning officers and the local highways authority didn't raise any objections to the scheme.

The decision notice lists unacceptable traffic congestion as one of the reasons for refusal.

Bovis Homes appealed the decision and a public inquiry took place in September 2015. They argued that detailed transport studies showed that the local roads were already severely congested but that the additional traffic wouldn't make things much worse ...

- "there would be limited practical difference in terms of traffic impact on the local road network whether or not the appeal scheme proceeds"
- "The highways network around the site suffers some congestion but the NPPF test is whether the additional impact of a scheme would be severe"
- Shurdington Road is already overloaded. Existing traffic on Shurdington Road would be displaced onto other routes by traffic from the development

The Council employed consultants to review the transport work supporting the scheme and argued that ...

- "In limited time, the review identified faults in the transport analysis. More time would have uncovered more faults. A defensive response to criticism and a lack of transparency engenders suspicion that there is something to hide."
- "Traffic forecasting and modelling was undertaken using the Council's SATURN based model. It is not inherently unreliable but it is a strategic model, outputs from which need to be adjusted to obtain the detail relevant to consideration of this development. There are concerns about its accuracy for this purpose."

The appeal inspector rejected the developer's arguments and in January 2016 gave his reasons ...

- "It is an often-expressed view that development should be expected to do no more than 'wash its own face' and not solve all existing unrelated problems. In relation to transport, that appears to be the view of the appellant, the local authority and the local highway authority."
- "The third bullet of NPPF paragraph 32 refers not to the additional impact of a scheme, as the appellant asserts but to residual "cumulative" effects, implying that it is the cumulative effect of all expected development which must be taken into account, rather than the individual contribution of each development in turn, which is likely to be (as in the present case) marginal."

• “Whilst I can agree therefore, that the development should not need to solve all existing unrelated transport problems, the existing or future “in any event” situation on the highway network, is not an Response to DPD Main Modifications Consultation Paul Tucker for Infrastructure First (ID 2383) Page 6 of 9 23 January 2022
unrelated problem which evaluation of the proposed development should ignore. It is a related problem which is highly pertinent to the evaluation of the current appeal proposal.”
Due to the strategic nature of the Bovis Homes scheme, the Secretary of State intervened ... upholding the view of the appeal inspector and dismissing the appeal in May 2016.

In his judgement he agreed with the Inspector’s analysis of highways issues ...

• Overall, he agrees with the Inspector that, taking account of the measures which are included in the s106 agreement, the residual cumulative effects of development proposed would increase demand for use of sections of the highway network which are already operating at over-capacity levels, contributing to a severe impact on a wider area of Cheltenham as traffic is displaced, contrary to both adopted and emerging policies. Paragraph 32 of the Framework states that development should only be prevented or refused on transport grounds where the residual cumulative impacts of development are severe.

• The Secretary of State concludes that granting permission for the appeal scheme would be contrary to the development plan overall due to the severe residual cumulative transport impacts.

Bovis Homes challenged the validity of the Secretary of State’s decision on a misinterpretation of ‘Residual Cumulative Impact’ and applied to High Court to overturn it.

In September 2016, Mr Justice Holgate presided over a hearing to consider whether there was a case to answer.

He was not persuaded that the Inspector and Secretary of State erred in law by taking into account of the existing highway situation when resolving the paragraph 32 NPPF questions. In particular, the Judge noted that it would be open to a decision taker to rationally conclude that a given development could wash its own face in highway impact terms, but due to existing over capacity, the residual cumulative impacts of the development could be severe.

• “The conclusions of the Inspector and the Secretary of State adverse to the Bovis proposal rested on the third bullet point of NPPF paragraph 32, the second half of which is the relevant provision. It reads: “Development should only be prevented or refused on transport grounds where the residual cumulative impacts of development are severe.”

• “He recorded in paragraph 221 the view of Bovis Homes and also the local authority and the County Council, that the development should be expected to do no more than “wash its own face” and not solve all existing unrelated problems. He contrasted that with the position of third parties pointing out that the existing situation into which the development would be placed is already not suitable in terms of highway capacity and that the future situation would be far worse, and therefore even less acceptable, as a location for the development of 650 dwellings.”

• “Taking up the third bullet point of NPPF paragraph 32, the Inspector pointed out in paragraph 223 of his report that the Framework refers not simply to the additional impact of the scheme, as had been asserted by the appellants, but to residual “cumulative” effects, implying that it is the cumulative effect of all expected development which must be taken into account in context rather than just the Response to DPD Main Modifications Consultation Paul Tucker for Infrastructure First (ID 2383)

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individual contribution of each development in turn which is likely to be, as in the present case, marginal.”

• “In view of his earlier reasoning there was no need for the Inspector to rely in addition upon circular 2/2013, but it did serve to emphasise that the existing levels of congestion were relevant, and not irrelevant as some parties had contended, to determining whether there would be severe residual cumulative impacts in breach of paragraph 32 of the NPPF if the proposed development were to go ahead.”

• “Furthermore, and in any event, it is also plain from paragraphs 14 and 32 of the Secretary of State’s decision letter that he correctly applied the “severe residual cumulative impact” test in the NPPF and not any different test. It cannot be said that the decision-maker has misinterpreted paragraph 32 of the NPPF. Nor can it be said that in using his judgment regarding the application of that test, he has misapplied it in such a way as to be open to challenge on public law grounds”

The High Court rejected the challenge and in doing so made an important ruling on the correct interpretation of the National Planning Policy’s meaning of residual cumulative impacts of development.

<https://www.bailii.org/ew/cases/EWHC/Admin/2016/2952.html>

MM16 – Updated Housing Trajectory

The primary objective of the DPD is to meet the residual housing need identified by the District Plan Examination in 2018 and to allocate sufficient housing sites to address the residual need for the district between 2024 and 2031.

The regulation 18 version of the DPD confirms the residual need to be 1,507 homes ...

“2.25 The revised housing supply figures set out in Table 2.3, illustrates that following consideration

for updated completion, commitments and windfall figures that the residual currently necessary to fully meet the district housing requirement is 1,507 dwellings as at April 2019.”

The regulation 19 version of the DPD shows that the residual need had reduced by 227 ...

2.29 The revised housing supply figures set out in Table 2.3, illustrates that following consideration for updated completion, commitments and windfall figures that the residual currently necessary to fully meet the district housing requirement is 1,280 dwellings as at 1st April 2020.

And the latest main modifications version of the DPD shows the residual need had fallen by a further 483 ...

2.29 The revised housing supply figures set out in Table 2.3, illustrates that following consideration for updated completion, commitments and windfall figures that the residual currently necessary to fully meet the district housing requirement is 797 dwellings as at 1st April 2021.

So in the two years it has taken to progress the DPD to the Main Modification stage, the number of houses it set out to allocate has officially reduced by very nearly half, from 1,507 to 797 homes.

Response to DPD Main Modifications Consultation Paul Tucker for Infrastructure First (ID 2383)

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This excludes the new homes approved in the 10 months since April 2021.

Of course there is no justification for ignoring these latest approvals in the latest version of the DPD as the Council will be fully aware of them. Using the information published on the Council's website we have reviewed the planning approvals since April 2021 and excluded those already included in the published list of housing commitments (MSDC-06b).

We have calculated the up to date residual need is now around 400 homes ... which leaves us with the very probable conclusion that the uplifted trajectory will be fully met by 2024/25 without needing to allocate any further schemes in the DPD.

However, the main modification version of the DPD still allocates schemes for a total of 1,704 homes. This represents an official oversupply of 907 as at April 2021 ... and using up to date figures, an oversupply nearer to 1,300.

Despite the Council's position stated during the public hearings that they do not accept the need for a buffer due to the robustness of their housing commitments; some level of oversupply is clearly prudent.

Tests of soundness require the Plan to be proportionate and justified. We don't believe that a fourfold oversupply meets these tests ... especially as there are very legitimate arguments which bring into question the sustainability of the 750 homes allocated at SA19/SA20.

MM22 – SA20 SANG monitoring

First of all it is worth reiterating that the residual housing need identified at the examination of the District Plan was made conditional on there being no further harm to the integrity of European Habitat Sites in Ashdown Forest. This was clearly stated in paragraph 65 of the Inspector's final report dated 12th March 2018. The Council have not presented any evidence to demonstrate that allocations in the DPD would not result in further harm to the Ashdown Forest SPA.

Main Modification MM22 adds wording relating to SANG provision and mitigation by adding a requirement for regular monitoring of the proposed SANG. However, The District Council are already committed to monitoring the effectiveness of their SANG mitigation under DP17 ... and therefore MM22 is somewhat superfluous.

Of course, committing to regular SANG monitoring doesn't mean that it will happen. Despite a similar commitment to regular monitor the existing Ashplatts Wood SANG, no monitoring had been undertaken since becoming operational in 2015. Although the latest Habitats Regulation Assessment (HRA) says that visitor surveys have now been undertaken following the examination hearings in June.

One of the Council's post-hearing actions was to demonstrate the effectiveness of their existing SANG mitigation; but their response (MSDC13) was far from compelling and presented no evidence to show that the Ashplatts Wood SANG had been successful in reducing visitor pressure on the Ashdown Forest SPA.

The Council clearly believe that SANG effectiveness is a forgone conclusion.

Response to DPD Main Modifications Consultation Paul Tucker for Infrastructure First (ID 2383)

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We submitted our own response (REP2383-010) highlighting the lack of evidence in the Council's post-hearing written submission and we are disappointed that our concerns have been apparently dismissed.

A further commitment to regularly monitor the proposed SANG as set out in the MM22 is clearly welcome; but what if monitoring shows that the SANG isn't successful in reducing visitor pressure from new development?

The Habitats legislation is clear that decision makers are required to apply the precautionary principle in evaluating adverse impacts on a protected site. In simple terms this means that it is 'better to be safe than sorry'. This surely mandates that approval of sites SA19/20 should depend upon the results of the visitor surveys carried out in June.

The Council have currently no evidence to demonstrate the success of their Ashdown Forest mitigation strategy and it would be premature to allocate SA19/20 prior to the forthcoming publication of the evidence provided by these visitor studies.

Indeed the approval of large scale housing within the accepted zone of influence with no evidence to support the HRA claim that adverse impacts can be ruled out is potentially open to legal challenge.

Yours faithfully

John & Caitriona Capp



1836

Site Allocations DPD: Main Modifications Response

Main Modification: MM2

ID: 18360

Response Ref: 1836/1/MM2

Respondent: Lesley Davidson

Organisation:

On Behalf Of:

From: Davidson, Lesley [REDACTED]
Sent: 24 January 2022 21:31
To: Policy Consultation
Subject: DPD Main Modifications Consultation

Importance: High

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Dear Sirs

I am writing to express my disappointment that the Inspector has not responded to legitimate concerns regarding the severe traffic situation in East Grinstead and in particular that approving 750 additional homes at Imberhorne Farm and Felbridge will NOT have a severe impact on local roads and health and education infrastructure.

Specifically unacceptable traffic congestion and road safety are the main constraints to large scale housing in East Grinstead and Felbridge, yet all evidence in this regard seems to have been disregarded by the Inspector and Council during ongoing consultation. Speaking personally, I avoid the A22 whenever possible and prefer to shop and use amenities in other towns rather than East Grinstead to avoid unnecessary time queuing, which I know others also prefer which is unsupportive to local business.

All drivers using the A22 into East Grinstead face significant delays during much of the day due to congestion at the Felbridge, Imberhorne Lane and Lingfield Road junctions ... and this is a current situation BEFORE the traffic from the 1,400+ homes already committed in and around East Grinstead exacerbate the situation further.

It seems that the existing traffic issues have been deemed not to be relevant by the Council, when this cannot be the case given the existing significant congestion and delays incurred when trying to reach East Grinstead town centre.

The Council has also ignored the impact of drivers avoiding long queues at certain junctions by re-routing along residential streets unsuited to through traffic. These routes were not included within the remit of the Strategic Transport Study and therefore not considered. The Competent Highways Authority describes the inevitable increase in rat-running as the result of SA19/20 as 'undesirable'. The Inspector presiding over the appeal for a scheme of 100 houses adjacent to SA20 (APP/D3830/A/10/2142385) was more forthright, in saying that ...

"Locally, peak-hour congestion on the A22 leads to the use of Imberhorne Lane as a cut[1]through to the B2110 and as part of a rat-run through the Imberhorne Estate to the town centre. The amount of traffic on the lane leads in turn to congestion on it and this, along with rat-running and traffic speeds can only be to the detriment of the safety of local residents and road users."

This was not a recent statement. It was made more than 10 years ago when there were nearly 1,800 fewer houses and substantially less traffic on the roads in East Grinstead. Since that time, the National Planning Policy Framework (NPPF) has been updated to require planning authorities to consider whether impacts on highways safety are acceptable or not. There is no evidence to suggest that the Council have given ANY consideration to either capacity or safety impacts on parts of the road network not covered by their Strategic Transport Study.

There have also been previous assessments of large scale housing which were rejected as unsuitable and shouldn't be allocated due to excessive levels of traffic congestion. One of the assessed sites in 2017 was Imberhorne Farm where the Council's report said:-

"Severe traffic constraints within East Grinstead would limit the amount of strategic development within the town unless significant mitigation is proposed. The site's major negatives relate to the severe transport constraints, which affect all sites in the East Grinstead area."

Roads around East Grinstead in that time have only become more congested so why are the Council promoting sites which were previously rejected?

At rush hour, traffic along the A264 frequently stretches beyond Rowplatt Lane when trying to get into East Grinstead. With a further 750 homes on top of the 1400 already approved, this is only likely to deteriorate further so I would respectfully ask the Inspector makes effective traffic congestion mitigation a condition of approving any further development.

Regards

Lesley Davidson

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1877

Site Allocations DPD: Main Modifications Response

Main Modification: MM2

ID: 18770

Response Ref: 1877/1/MM2

Respondent: Andrew Jordan

Organisation:

On Behalf Of:

[REDACTED]

From: ANDY JORDAN [REDACTED]
Sent: 19 January 2022 21:58
To: Policy Consultation
Cc: Andrew Jordan
Subject: Mid Sussex Planning Meeting 24th Jan 2022 - Development to the South of Crawley Down Road
Attachments: Planning Meeting 24th Jan 2022 Letter of Concern AJ.docx
Follow Up Flag: Follow up
Flag Status: Flagged

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To whom it may concern

Please find attached a letter that I would like to be included for consideration at the above Planning Meeting.

Yours sincerely

Andrew Jordan



Mid Sussex District Council
Oaklands
Oaklands Road
Haywards Heath
West Sussex
RH16 1SS

Email: policyconsultation@midsussex.gov.uk

19th January 2022

Re: Development to the South of Crawley Down Road
Planning Meeting 24th January 2022

To whom it may concern at Mid Sussex District Council Planning Meeting.

I wish to protest about the proposed development and building of 200+ homes on land to the south of Crawley Down Road, Felbridge, West Sussex.

As a resident of Crawley Down Road, clearly this is going to affect me personally, in many ways, however I wish to raise most strongly the issue of traffic congestion.

The issue of access and egress traffic from the new development, problems when passing Felbridge Church of England School, and the small row of shops, problems in leaving Crawley Down Road and entering the traffic onto the Copthorne Road towards Felbridge traffic lights. Also, the concern of residents of the new development turning left onto Crawley Down Road, and then taking a right hand turn into Rowplatt Lane in order to begin a journey on Copthorne Road toward Crawley.

Unless you have lingered in these areas at rush-hour, you will not be as concerned as is necessary.

I do not believe any consideration has been taken for these traffic problems. There are already terrible traffic issues, and a new development will only make that much much worse.

Others will have commented on the terrible traffic problems within the whole town of East Grinstead, particularly going south on the London Road towards East Grinstead town from Felbridge.

It all feels extremely unsafe, sometimes 3/4 of an hour to get from Felbridge to East Grinstead.

Clearly Barrett Homes are not concerned about the well-being of residents, but are focused on use of the land.

The commissioned traffic report makes no reference to the fact that in the rush hour, and school drop off and collection times it can take in excess of 20 minutes to get from Rowplatt Lane, along the Crawley Down Road to the A264 Copthorne Road.

How can adding traffic from another 200 houses on to the Crawley Down Road be considered either workable, sustainable or safe.

Please take responsibility for this catastrophic decision. Please consider the lack of any attention towards 'infrastructure' such as schools, and GP provision, but especially the major issue of traffic congestion.

I will be grateful for your reply.

Yours sincerely

Mr Andrew Jordan

1878

Site Allocations DPD: Main Modifications Response

Main Modification: MM2

ID: 18780

Response Ref: 1878/1/MM2

Respondent: Edward Charter

Organisation:

On Behalf Of:

[REDACTED]

From: Edward Charter [REDACTED]
Sent: 23 January 2022 17:22
To: Policy Consultation
Subject: Register of Objection to Large Scale Housing Developments in East Grinstead & Felbridge

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Register of Objection to Large Scale Housing Developments in East Grinstead & Felbridge

Dear Sir / Madam,

As a West Sussex resident and council tax payer, I am writing to register my objection to the large-scale housing developments proposed in East Grinstead and Felbridge.

I object on several grounds;

Firstly, at a time when we should be trying to reduce our carbon footprints by growing and eating local produce, large tracts of productive farmland are set to be destroyed by these developments, in addition to the destruction of habitat for numerous birds, animals and insects. Furthermore, the Imberhorne / Gulledge area is a well-used leisure facility for walkers, joggers, cyclists and horse riders, at a time when it is recognised the physical and mental wellbeing benefits of people to have access to open and green spaces.

Secondly, no additional infrastructure is proposed to support these developments. There is already considerable pressure on services such as health and education within the East Grinstead areas; on top of other developments currently going ahead, these additional developments will make access to these services even more difficult for current residents. In addition to this, it has been shown by several studies that the traffic produced by these new developments will overload an already overburdened road system. East Grinstead is already horribly congested throughout large parts of the day - the existing roads cannot support the existing level of traffic, as the council's own studies already demonstrate. There have been nebulous statements about encouraging cycling and walking, I would be grateful if you can demonstrate if this has ever happened with new developments! In my experience most new developments will come with at least two cars per household - an intolerable pressure for a road network that has been demonstrated many times is already at or near capacity. Furthermore, the council is incapable of maintaining the current roads, which are in a shocking state; covered in potholes, surfaces crumbling with badly bodged repairs. In two years, I have had four new tyres on my car and had to have several suspension components replaced - all due to the council's inability to even keep the existing roads to a sufficient standard!

Thirdly, these developments represent the continued erosion of East Grinstead's character as a mediaeval market town. It seems that the council won't be content until we are a mini-Croydon, or in effect a suburb of Crawley. Complete with ring-road, endless sprawling housing developments, and large blocks of flats towering over the town. A lot of people move from Croydon to East Grinstead precisely to get away from that kind of environment.

I would like you to confirm receipt of this email, and look forward to a response.

Yours sincerely,

Edward Charter

1897

Site Allocations DPD: Main Modifications Response

Main Modification: MM2

ID: 18970

Response Ref: 1897/1/MM2

Respondent: Melissa Ransom

Organisation:

On Behalf Of:

[REDACTED]

From: Melissa Ransom [REDACTED]
Sent: 24 January 2022 20:58
To: [REDACTED]
Subject: DPD Main Modifications Consultation

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DPD Main Modifications Consultation **24th January 2022**

-
[REDACTED]
[REDACTED]

We wish to give our response to the large scale building housing proposal in and around East Grinstead. Having lived in [REDACTED] East Grinstead for the last 14 years the road has increasingly become a rat run for traffic cutting through to avoid tailbacks on the A22. The pollution has become steadily worse as there is none or very limited public transport in the area.

The noise level in our road that is very close to the countryside has become the hum of an outer London town. Although we understand the need for additional housing, the problems in East Grinstead from traffic have become excessive and no plans have been made for any infrastructure to ease the problem from the traffic.

East Grinstead has always been a town difficult to access due to the build up of traffic in the bottle neck. It only takes a road or a traffic light to be at fault and the build up of traffic all through East Grinstead is appalling; it has a knock on effect due to the already increased traffic in the town from the existing building.

Presently working as a supply teacher getting out of East Grinstead can add at least 15 minutes on my journey if it is not grid locked. Last week I spoke to another Supply teacher who refuses to work in East Grinstead as he found it impossible to access during the start of the school day.

We haven't been able to visit our GP face to face and it is extremely difficult to get an appointment over the phone. There are no GP's taking on new patients in the town. No plan for further surgeries has been approved.

The impact on the Ashdown forest has been largely ignored and it was understood that people would visit Asplats forest. In 14 years we and many other families who live in the area have never visited Asplats forest. We only go to the Ashdown forest. Why would you when the next village along has an area of astounding natural beauty?

It is difficult to believe that West Sussex has largely ignored the fact that East Grinstead is not the correct place to build large scale housing. We are appalled by the lack of response by our Councillors and West Sussex pushing this proposal through.

Melissa and Brian Ransom

1898

Site Allocations DPD: Main Modifications Response

Main Modification: MM2

ID: 18980
Response Ref: 1898/1/MM2
Respondent: Owen Davies
Organisation:
On Behalf Of:

From: Owen Davies [REDACTED]
Sent: 23 January 2022 20:28
To: Policy Consultation
Subject: Policy consultation Mid Sussex - Policy MA20

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Dear Sir

Re: the imposition of 550 dwellings on Imberhorne Farm, west of Imberhorne Lane, East Grinstead.

I know you are seeking modifications to this plan, but I write as a local resident of East Grinstead who will be impacted by this proposed development. I walk my dog on this open land 2-3 times per week and I have to negotiate both the A22/Imberhorne Lane junction and the Star junction at Felbridge most days per week; both junctions are significantly over capacity already and new developments of this size will increase traffic still further.

I, along with the majority of East Grinstead residents, totally oppose the imposition of these houses. It is totally out of scale with East Grinstead. The views of local residents have been totally ignored in the recent inquiry/examination.

In my opinion, modifications need to be made as follows:

1/ Other new houses have been approved in East Grinstead since this development was initially proposed. (some 1400 are already in the pipeline). The requirement for 550+ houses on the Imberhorne site is therefore not needed and should be reduced significantly.

2/ The volume of traffic that this new estate will create is an absolutely significant factor, but without any apparent explanation, was largely ignored at the recent examination. No matter how many so called public transport proposals are put forward, these will not materially mitigate the delays and congestion that will inevitably occur and bring unacceptable delays to local residents.

Whatever the number of houses built on the Imberhorne Farm site, significant expenditure must be made to the two nearby traffic light junctions (A22/Imberhorne Lane and Star Junction Felbridge) which are already significantly over capacity; both relevant highway authorities (West Sussex and Surrey) have confirmed they are over capacity. This was also extensively proved at the inquiry by Infrastructure First who submitted several pieces of evidence to highlight this.

In 2019, Tandridge council unsuccessfully applied for an £8.7m government infrastructure grant to upgrade the Felbridge junction. At the recent examination, Infrastructure First presented figures to show the current cost of these improvements was likely to be somewhere between £10 and £18m. When challenged by the Inspector, the developer simply said that their estimate was £0.8m.

Such a huge discrepancy and yet the Inspector didn't pursue this and so we, the local public, don't know how the developer arrived at such a low and ridiculous figure! And yet alterations to these junctions to permit increased traffic flow, is perhaps the 2nd most significant factor affecting this proposed development.

The developer has also made some statements that they could 'widen the A22'. Anyone who knows this road realises that this is physically impossible. The issue are the two traffic light junctions as detailed above.

I take this opportunity to remind you about the significant issues with regard to traffic issues over the past 10 years, as identified by official council research/reports:

A The approval of the Oaks development (on land off Imberhorne Lane adjacent to this new proposed development), in 2011 the appeal inspector said ...

"There is a recognised problem of traffic congestion in East Grinstead which has been the subject of studies over the years and is accepted as a major constraint on future growth in and around the town. Locally, peak-hour congestion on the A22 leads to the use of Imberhorne Lane as a cut-through to the

B2110 and as part of a rat-run through the Imberhorne Estate to the town centre. The lane has a 30mph speed limit which is regularly exceeded and it is used by commercial vehicles, including in connection with a waste recycling facility, as well as cars. The amount of traffic on the lane leads in turn to congestion on it and this, along with rat-running and traffic speeds can only be to the detriment of the safety of local residents and road users.”

So, 10 years ago, it was recognised and accepted that traffic congestion was a serious problem in East Grinstead at these two junctions. How can it be credible to suggest that now, it is not an issue? That is blatantly not true.

As part of the approval of the Oaks development, West Sussex Highways withdrew their objection prior to the appeal hearing, in return for extra funding from the developer to synchronise the traffic signals at both the Felbridge and Imberhorne Lane junctions. Infrastructure First has now had confirmation from Surrey Highways that this synchronisation of the two junctions was never implemented due to technical difficulties, despite being a condition of the Oaks development approval. That is simply not good enough and developers and councils need to be held to account.

B/ In 2017, Mid Sussex assessed potential housing sites as part of the District Plan. One of the assessed sites was Imberhorne Farm. At that time the site was REJECTED as unsuitable and the Council recommended that it shouldn't be allocated due to excessive levels of traffic congestion. Their report said

...
“Severe traffic constraints within East Grinstead would limit the amount of strategic development within the town unless significant mitigation is proposed. The site’s major negatives relate to the severe transport constraints, which affect all sites in the East Grinstead area.”

So, 4 years ago, it was still recognised and accepted that traffic congestion was a serious problem at these two junctions. How can it be credible to suggest that now, it is just not an issue and been dismissed?

C/ Infrastructure First also found the results of a detailed study of the Felbridge junction on Tandridge Council’s website. This was undertaken in **2018** and although only the executive summary has been made public, it shows that the junction was operating at 106% capacity.

D/ Infrastructure First also pointed to the first hand evidence provided by a different inspector in relation to the **2019** planning appeal for 63 homes along the Crawley Down Road ...
“From the local perspective the traffic queuing eastbound on Copthorne Road towards the traffic lights builds up at peak times and frequently reaches as far back as Rowplatt Lane, about 1 km from the junction, and sometimes even further. This was observed during the site visit about 5.30 pm on 15 May and is corroborated by a video camera survey undertaken by the Council over the three-day period 17-19 July 2018”

The fact that Mid Sussex jointly commissioned the 2018 junction study is damning. They knew full well that more reliable traffic data existed that would undermine the traffic evidence they used to support more houses at the recent examination. However, the Council not only refuse to publish the full details of the 2018 traffic survey ... but when challenged say that the more reliable study is not relevant!

Since the traffic issues are such a vital element, if not the most vital aspect, it doesn't seem in any way rational why the Inspector failed to challenge the Council on the disparity.

Mid Sussex has not committed to any road or junction improvements but instead are relying on more of us using the bus or travelling by bicycle. Get real, this just isn't going to happen in the numbers required to have no impact on vehicle traffic numbers.

3/ Another effect of the increased traffic levels will be to **push yet more traffic onto inadequate residential roads** to avoid the queues and create even more 'rat-runs'. A further side effect of this will be to **significantly reduce safety**, particularly for children, as there are several primary schools on these 'rat-runs'.

4/ If land owned by Imberhorne School is taken to provide access roads to the new Imberhorne houses [which I believe would be the case], adequate corresponding replacement land for sports pitches and future school development must be set aside and ring-fenced for this sole purpose.

5/ The proposed location of the new recreational space at the far western end of the development is totally inappropriate and will not be fully utilised. What existing residents will walk all the way through the proposed new estate to go to a small parkland area? It will be near enough zero.

In conclusion, I would urge you to review this new Imberhorne development and not approve it for the numerous reasons I have stated and repeated from the recent examination. Traffic congestion is the main issue and needs to be re-looked at having been ignored/dismitted at the examination. The local residents of East Grinstead deserve better from elected representatives.

Yours

Owen Davies

A large black rectangular redaction box covering the signature area, with a small white rectangular cutout on the right side.

1907

Site Allocations DPD: Main Modifications Response

Main Modification: MM2

ID: 19070
Response Ref: 1907/1/MM2
Respondent: Frank Osborne
Organisation:
On Behalf Of:

[REDACTED]

From: Frank Osborne [REDACTED]
Sent: 23 January 2022 21:38
To: Policy Consultation
Subject: DPD Main Modifications Consultation

[Some people who received this message don't often get email from [REDACTED] Learn why this is important at <http://aka.ms/LearnAboutSenderIdentification>.]

Dear Sirs

As an East Grinstead resident I would like to express my dismay that the examiner chose to ignore the severe traffic problems in the town, notably the A22 - A264 junction at Felbribe, when reaching his decisions relating to housing development at Imberhorne. Such large scale development would undoubtedly exacerbate congestion on the already overloaded roads. Previously MSDC has recognised the situation but together with the Examiner has failed to address the issue.

Rather than repeat the detailed objections of Mr Paul Tucker of "Infrastructure First". I would like to add my name to his comprehensive list of omissions and failings of both the councils and the enquiry findings. One would hope that it is not too late for MSDC to face up to their responsibility in considering the plight of residents before proceeding to make an already intolerable situation a great deal worse.

Frank Osborne
[REDACTED]

1950

Site Allocations DPD: Main Modifications Response

Main Modification: MM2

ID: 19500
Response Ref: 1950/1/MM2
Respondent: Richard Penny
Organisation:
On Behalf Of:

[REDACTED]

From: Richard Penny [REDACTED]
Sent: 24 January 2022 23:40
To: Policy Consultation
Subject: DPD Main Modifications Consultation.
Attachments: DPD Main Modifications Consultation.doc

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Dear Sir,

I refer to the attached.

Yours sincerely,

R. Penny.

[REDACTED]

DPD Main Modifications Consultation.

There has been a level of housing development in and around East Grinstead for the past 20 or so years that is unsustainable. A succession of small and medium estates springing-up that will not, according to developers and planning authorities, have any detrimental effect on the local community.

England is the most crowded country in Europe and South-East England the worst affected. You can leave Manchester, some 250 miles north west of Felbridge, at around 7.30 on any weekday evening and drive without having to stop, including past Birmingham, until you reach the M25 at somewhere around half-past midnight, where as often as not you will grind to a halt.

The population of East Grinstead has risen some tenfold in the last twenty years with no improvement to the local infrastructure or facilities; doctors' surgeries are full, finding a dentist is not easy, schools are overcrowded and school places are at a premium, shoppers have difficulty parking in the town. We now have traffic jams where there used to be hardly any traffic. And this is before one considers the problems created for the A22: East Grinstead has become a series of rat-runs for motorists trying to avoid traffic jams: cars - and some lorries! - diving down back roads to avoid queues, some driving like hooligans belting along to be first at the next junction - and sleeping policemen don't stop them. This at a time when local people are on foot.

The A22 through Felbridge has been a known traffic black spot for more than half-a-century. The A22 is a major national trunk road that runs from Purley, South London, to the South Coast, passing through two counties and areas of Outstanding Natural Beauty; it falls under the aegis of the Government, and Surrey and Sussex County Councils; also affected are local authorities and interest groups. No-one has yet come up with a viable plan to solve the increasingly crippling traffic problems created for the A22 by consistent development. There has been a lot of tinkering over the years in Felbridge which has only made matters worse, notably Wickes' shop, which no-one in Felbridge wanted. We were told that the re-jigged junction of the A22 and Imberhorne Lane to include Wickes' access would take care of the extra traffic; it has not. (When Felbridge residents complained during construction they were told, by a Wickes representative, that Felbridge residents would have to put up with it.)

Merely driving from Felbridge into East Grinstead centre, a distance of approximately two miles, can take more than half-an-hour.

Where the extensive existing infra-structure and buildings along the edges of the A22 precludes widening the road is of a finite width and can accommodate two lanes only. This is particularly true of the stretch between the traffic lights at the Star Inn to the south of Forest Row.

Warnings of congestion have been ignored. Proposals for widening the A22 have been submitted and have proved unworkable: no matter how much water you pour into a funnel, the maximum outfall will never increase, unless you widen the exit and in the world of Engineering two plus two will never equal anything other than four. In the worlds of advertising, publicity, politics and salesmanship, two plus two will

equal anything you can convince people it will – an ethos in which developers and local planners are well-versed.

The local population don't need traffic studies to tell them about the effects on congestion of over-population. Anybody who thinks that development in this area will not adversely affect traffic is a fool.

The people who are responsible for this mess are, for the most-part, not local; those of us who live here are in no doubt that developers and planners know not of the mess they have created.

It doesn't end there:

Southern Water, who control the sewerage systems, are already beyond capacity and are having to dump raw sewage into our streams and rivers as well as into the English Channel. It should also be observed that discussions of foul sewers is usually couched in genteel euphemisms which distances the participants from the reality of what *actually* passes through them.

It is not a subject for the faint-hearted. Raw sewage is a mixture of rejected food from the human gut along with any diseases – including, pertinently, Covid - that the contributors may carry; and it stinks. There's more: once upon a time, in living memory, washing-up was done at the sink with hot water, detergent and a cloth or brush, and a scourer with a certain amount of violence. This is now carried out in machines that instead dissolve chemicals in cold water and spray them onto one's washing up - and one's washing up comes out sparkly clean. No-one stops to think exactly what it is that these chemicals are, but they have to be corrosive and cannot be pleasant; I know of no-one who would pour any of them onto their garden. Nor even does it end there: washing machines slop your clothes around in chemicals dissolved cold water thus removing all the stains and leaving your clothes spotlessly clean. Similarly, who has stopped to examine what chemicals and in what concentrations are used in these machines? Lastly there is what could be classed as non-standard stuff; dead animals, disposable nappies, drugs, needles, snotty tissues and much more - anything, in fact, that is of no use or too disgusting to be disposed of in any other way.

Some 25 - 30 years ago it was generally accepted that the new sewage treatment plant being constructed at Eastbourne was inadequate for the *then* current demand, leave alone any increases. Consider also that the growth in the human population is exponential.

But no planning applications are going to be refused due to lack of sewage treatment capacity!

The houses that are being proposed across East Grinstead will contain thousands of people and, since Southern Water is already beyond capacity, at peak times *all* their daily foul sewage in its raw state, complete with diseases, odours, chemicals and non-standard stuff is going to be discharged into the countryside.

The creeping, bit-by-bit-rather-than-come-clean-and-declare-the-*whole*, attitude to development around here is an insult to the ratepayers and the voters and is ruining the area.

The planning committee have been saying throughout this that the increases will not have any affect on local life, but the developments that are submitted are small; each is considered against its own impact on the neighbourhood, the aggregate affect is ignored. Taken individually the affects are downplayed by the planners and no developer is ever going to admit in his deposition that his development will have any detrimental affect.

The total number of proposed new houses is in the thousands.

Each stage of the development process has followed a similar route: submit new proposals in small packages such that the impact of each an be written to a minimum and shown, therefore, to be not detrimental the area.

And all that is palpable nonsense; ask anybody who lives here, particularly those who have lived here for the past 20 years or more.

It has to be stopped.

R. Penny,



1953

Site Allocations DPD: Main Modifications Response

Main Modification: MM2

ID: 19530

Response Ref: 1953/1/MM2

Respondent: Elizabeth Jordan

Organisation:

On Behalf Of:

[REDACTED]

From: Elizabeth Jordan [REDACTED]
Sent: 19 January 2022 21:32
To: Policy Consultation
Cc: [REDACTED]
Subject: Development to South of Crawley Down Road - Meeting 24th Jan 2022
Attachments: Planning Letter for Meeting 24th January 2022 BJ.docx

Follow Up Flag: Follow up
Flag Status: Flagged

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To whom it may concern

Please find attached a letter of concern for consideration in the planning meeting on 24th Jan 2022.

Yours sincerely

Elizabeth Jordan

Sent from my iPad

1958

Site Allocations DPD: Main Modifications Response

Main Modification: MM2

ID: 19580

Response Ref: 1958/1/MM2

Respondent: Henry Lacey

Organisation:

On Behalf Of:

From: Henry Lacey [REDACTED]
Sent: 23 January 2022 21:03
To: Policy Consultation
Subject: DPD Main Modifications Consultation"

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Paul,

I find it utterly incredible that the council is even considering the massive building proposals in Felbridge.

As a resident it is already clear the current road infrastructure can't cope with the traffic at the moment. And to think some "clever" people believe adding 500 houses (plus another 200 on another development) will have no impact!!!!!!!

The current educational facilities will not be able to sustain the amount of extra pupils. The local healthcare systems will not be able to sustain the extra people. The local wildlife and environment will suffer beyond repair. I am sure the developers will be aware of all these issues but with the correct amount of money provided in the correct places all issues just disappear.

This is beyond a joke.

Many thanks

Henry Lacey

[Sent from Yahoo Mail for iPhone](#)

2007

Site Allocations DPD: Main Modifications Response

Main Modification: MM2

ID: 20070

Response Ref: 2007/1/MM2

Respondent: Mike French

Organisation:

On Behalf Of:

[REDACTED]

From: MIKE FRENCH [REDACTED]
Sent: 13 January 2022 11:22
To: Policy Consultation
Cc: [REDACTED]
Subject: Mid Sussex - Development Plan SA19 - Main Modifications Consultation

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To whom it may concern.

I write to express some of my opinions with regard the above.

The Mid Sussex District Council have approved housing schemes, currently under construction in Felbridge for a total of 120 new homes which have yet to impact on meagre local services and the already congested A264/A22 junction.

Cumulative and residual traffic impacts remain, are increasing, and have not been shown to be accounted for within the proposed schemes of highway improvements under the plan.

The A264/A22 junction has been subject of many examinations and no viable solution to the congestion problems has been forthcoming. Vague and unquantified promises to 'contribute' toward the cost of road 'improvements' based on undeliverable bus lanes and improved public transport provision are a sop by the developers who should be made to carry out any such 'improvements' before the houses are built.

I live in Mid Sussex in the village of Felbridge. East Grinstead is my local town and I depend on the facilities there for my normal daily need. Over years the journey in and out of East Grinstead on the A264 and A22 has taken longer and longer. The shortest distance into East Grinstead via the A264 and A22 is 2.4 miles but to avoid the congestion at the Felbridge junction of the A264 /A22 I often chose to travel via Turners Hill, a journey of about 8 miles.

The Felbridge village school, located entirely in the County of Surrey, is widely acknowledged locally to be grossly oversubscribed and for the 2020 intake there were 112 applications for 30 places. This is set to present a problem in relation to the 120 new homes already approved in Felbridge. In addition, Surrey Council have stated their intention to give priority and limit intake to Surrey residents, and this will exclude any children from these new developments.

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.

The Council's selection process has also awarded the highest possible rating when assessing SA19 against its 4th sustainability objective – "To improve access to retail and community facilities". 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 (2.5 miles) distant and can only be accessed via the congested A264/A22 Felbridge junction and A22 corridor.

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 provide any services in the Mid Sussex demise in Felbridge village, the vast majority of which lies within Surrey.

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". Taken in addition to the already approved 120 houses, these further 200 homes will result in a village population increasing by more than 50% over such a short period. These 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.

Permissions for housing on this scale was similarly unfounded on account of Felbridge's village status.

Mike French



2027

Site Allocations DPD: Main Modifications Response

Main Modification: MM2

ID: 20270

Response Ref: 2027/1/MM2

Respondent: Tony Baulch

Organisation:

On Behalf Of:

From: Tony Baulch [REDACTED]
Sent: 24 January 2022 17:04
To: Policy Consultation
Cc: [REDACTED]
Subject: MSDC DPD / SA20 Objection

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In summary the inspector failed in his duties when reviewing SA20 and now MSDC are modifying the DPD to better make it fit what they have already decided, local government and consultation is broken

- Traffic at Imberhorne Lane & Star junctions is shown to be over capacity by WSCC and SCC surveys so has does building 100's more houses result in the junction becoming less congested?
 - MSDC rejected Imberhorne Farm in 2017 because of traffic impact, but now it's okay?
- Traffic be pushed onto other routes to avoid congestion creating further environmental damages in places such as Turners Hill, again with over capacity junction in the middle of a small village next to a school.
- Loss of strategic gap between East Grinstead and Crawley Down with Felbridge being fully merged into East Grinstead
- Over allocation of homes within MSDC allocation plans, why allocate more than required?
- For years planning has bee uncontrolled with every appeal being lost or capitulated, the plan does not include sufficient infrastructure to make further housing bearable.
- SA20 includes plans for a single form infant and primary along with a small doctors surgery.
 - Single form entry schools are not viable and would not be able to provide a good standard of education.
 - Doctors are seeking/being encouraged to merge small practices to be able to provide a greater range of services to patients - how would a small practice be able to address patient needs?
- Why so many houses for SA20 – for the developer to make money – why not reduce the number and move development away from listed Gullede House?

Regards
Tony Baulch

2047

Site Allocations DPD: Main Modifications Response

Main Modification: MM2

ID: 20470

Response Ref: 2047/1/MM2

Respondent: Stephen Cox

Organisation:

On Behalf Of:

[REDACTED]

From: Stephen Cox [REDACTED]
Sent: 24 January 2022 10:10
To: Policy Consultation
Cc: [REDACTED]

Subject: SA19/SA20 - Proposal for 550 houses at Imberhorne Farm and 200 houses in Felbridge

Some people who received this message don't often get email from [REDACTED] [learn why this is important](#)

Dear Sirs,

I am writing to once again express my disbelief that the traffic issues in the surround area appear to have been totally ignored in agreeing to the change of use of the fields in question from agricultural land to development land. It appears that the Council are being very selective about which traffic reports they choose to believe and quote from and completely ignore those, very valid alternative reports which show what all local residents appear to know which is that the junctions are already beyond their capacity.

Previous traffic surveys have already shown the A22/A264 junction is already at or exceeding its capacity and yet a further 1,000+ cars are now likely to use the junction every day with peak times becoming even more unbearable. There are often 1km traffic queues back along the A264 at peak times and these make it extremely difficult to judge a what time to leave in order to collect family members from school or other events, potentially leaving children alone and upset by the roadside awaiting collection.

I really feel that the Council have not addressed the concerns that we raised in the recent Inspection.

Having also now seen the plans proposed by Barratts for the 200 houses at Felbridge I am concerned that this looks even more like over-development for an area where the average houses per hectare is nothing like what is being proposed.

I am additionally very concerned that the plans seem to indicate that after dark every car that travels to the two Westerly fields will shine their headlamps directly at my house, causing me a very undesirable change in the light which affects my house and therefore affecting my rights to light.

Having reviewed the information provided by our local group (Infrastructure First, whom I support wholeheartedly) it does also appear to suggest that East Grinstead and surrounding area have more than covered their share of housing needs with 1,783 houses already having been added and a further 1,420 in the pipeline before these two sites are given permission. I share the view of Infrastructure First that the Council have not proved the test of soundness as these cannot be truly 'Justified' as they are allocating more than 4 times the number of required homes.

Please do not approve this change in use or at the very least please ensure that the local traffic issues are properly addressed and resolved before the site is allowed to be developed.

Regards,

Stephen Cox
[REDACTED]

2094

Site Allocations DPD: Main Modifications Response

Main Modification: MM2

ID: 20940

Response Ref: 2094/1/MM2

Respondent: Victoria Graves

Organisation:

On Behalf Of:

[REDACTED]

From: rvgraves [REDACTED]
Sent: 24 January 2022 15:37
To: Policy Consultation
Subject: DPD Main Modifications Consultation

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Large scale housing proposals in East Grinstead and Felbridge

I cannot believe that the Inspector has not addressed the impact that the large scale housing proposals will have on the local roads. I have lived on the Imberhorne estate for the last 16 years. In the time that we have been here the rat running, on what were once quiet residential streets, has increased no end. People are driving at speed through the estate to avoid the eternal gridlock on the A22 and A264. I worry about the safety of the children and pets that live on the estate. There are 2 primary schools on the estate, and given the speed I see people drive by them there is going to be a serious accident. My son goes to school in Copthorne so I have the dubious pleasure of driving through the Felbridge lights 4 times a day. This should be a short 20 minute round trip but frequently this journey takes me in excess of an hour. It has been known for it to take me an hour one way. The traffic on the A264 regularly backs up as far or if not further than Doves Barn. The queue to the Felbridge junction regularly queues back up Heathcote Drive. This large scale housing is simply not sustainable. On top of this the doctors, dentists and schools are all full. Green belt land and wildlife habitats are being destroyed.

I strongly urge him to reconsider. We simply cannot take any more development!

Kind regards

Victoria Graves

2109

Site Allocations DPD: Main Modifications Response

Main Modification: MM2

ID: 21090
Response Ref: 2109/1/MM2
Respondent: Emma Ryan
Organisation:
On Behalf Of:

[REDACTED]

From: Emma Ryan [REDACTED]
Sent: 24 January 2022 22:49
To: Policy Consultation
Subject: Fwd: DPD Main Modifications Consultation SA20/SA19

Follow Up Flag: Follow up
Flag Status: Completed

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Dear Sir/Madam,

My full name and address for my response as previously sent

My name is Emma Parker
[REDACTED]

Kind regards,
Emma

----- Forwarded message -----

From: Emma Ryan [REDACTED]
Date: Mon, 24 Jan 2022, 21:51
Subject: DPD Main Modifications Consultation SA20/SA19
To: <policyconsultation@midsussex.gov.uk>

Dear Sir/Madam,

As a resident of [REDACTED] I am absolutely shocked that the concerns of local residents, local councils, Sussex Wildlife Trust and others, regarding traffic congestion and the health and the environmental impact that SA19/SA20 would have, were totally dismissed by the Inspector.

Whether you are for or against the development of Imberhorne Farm, it is quite clear that unless major changes were to occur to the Felbridge junction and Imberhorne/A22 junction, any increase in housing within the area would just lead to

- even more congestion especially at peak times,
- even higher levels of NO2, which currently stand at the highest in Midsussex, having a negative impact on the health of local residents and children at school
- the increase use of back roads through residential areas to overcome the congestion on the A22.

Ensuring adequate traffic flow around this development should at a minimum be a non-negotiable condition of the approval. The inspector has failed in his duty to ensure he has looked at and carefully considered/questioned all the data available to him. There is very clear evidence that the infrastructure cannot cope with any future housing in the area.

I would even go as far as to question the integrity of the Inspector. He should provide written evidence as to why he came to the conclusion (even with hard evidence) that there is no issue with regards traffic in the area.

I hope my concerns are looked at.

Kind regards,

Emma

2251

Site Allocations DPD: Main Modifications Response

Main Modification: MM2

ID: 22510
Response Ref: 2251/1/MM2
Respondent: Ann & Keith Turner
Organisation:
On Behalf Of:

[REDACTED]

From: Ann [REDACTED]
Sent: 21 January 2022 10:46
To: Policy Consultation
Cc: [REDACTED]
Subject: Proposed Housing Developments Felbridge & East Grinstead

You don't often get email from [REDACTED] [learn why this is important](#)

Dear Sirs,

We do not consider that the moderations put forward by the Council in response to the Inspectors views address the issues of traffic affecting East Grinstead and Felbridge and the environmental impact on the Ashdown Forest.

Traffic

Having lived in East Grinstead for nearly 30years the town and Felbridge have seen a large increase in housing provision with no changes to the road infrastructure to mitigate the effects on traffic congestion.

It was planned with the initial developments on Imberhorne Farm that a by-pass would be built in order to relieve traffic through East Grinstead and Felbridge and in particular the A264 and junction with the A22. Currently there are two developments currently under construction (Turners Hill Road and the A264 near the Felbridge County Primary School) which will increase traffic flow and no doubtably will likely increase the extent of "rat run" through the Imberhorne Estate notably Imberhorne Lane, Heathcote Drive and Garden Wood Road.

The current levels of traffic congestion are not just confined to the rush hour periods and schools starting and finishing times. The Council have previously stated there are traffic issues in East Grinstead and Felbridge but surprisingly they currently claim there are none despite the increase in housing over the last decade and those currently under construction. The Council do not appear to have carried out a traffic census in order to justify their current claim regarding no traffic issues. It is not uncommon to have traffic jams along the A264 back to the Doves Barn Garden Nursery, along Imberhorne Lane back to the junction with Heathcote Drive, along Heathcote Drive back to a small row of shops and along the London Road in both directions from the junction of the A264.

The current proposals on Imberhorne Farm and in Felbridge will only increase traffic levels and congestions and that the current road network cannot be materially changed to mitigate the effect.

Environment

The proposal that Ashplats Wood would mitigate the effect on the Ashdown Forest is absurd. Ashplats Wood and the environs of East Court are invariably used by local residents. It does not attract those who would visit Ashdown Forest, a world renowned area together with its natural beauty and wildlife. I am not aware of the Council carrying out any in depth survey that supports their views.

We are also concerned with the environmental impact on Imberhorne Farm and its wildlife together with the impaired effect on walkers enjoyments of the environs along the Worth Way, Crawley Down, historic 14th century Gullege and Felbridge network of footpaths and bridleways. The impact will likely mean people will take to their cars to travel to a more enjoyable environment in which to walk and exercise which is unlikely to be Ashplats Wood.

In conclusion, I ask that you reject the proposals in East Grinstead and Felbridge on traffic and environmental issues together with what appears to be an apparent disregard to the needs of schools, health and support services.

Yours faithfully,

Keith & Ann Turner

2295

Site Allocations DPD: Main Modifications Response

Main Modification: MM2

ID: 22950
Response Ref: 2295/1/MM2
Respondent: Heather Byrne
Organisation:
On Behalf Of:

[REDACTED]

From: Heather Byrne [REDACTED]
Sent: 21 January 2022 14:11
To: Policy Consultation
Cc: DAVIES, Mims
Subject: Site Allocation in East Grinstead SA 20 - land to the west of Imberhorne Lane

You don't often get email from [REDACTED] [Learn why this is important](#)

Dear Sir

I am writing once again to object to the development of this area of East Grinstead.

The refusal to build only one fifth of these houses on this land over 10 years ago due to the increased congestion onto Imberhorne Lane, the A22 and the A264 has been completely overlooked and, indeed, dismissed by the latest inspector and MSDC.

This is quite frankly ridiculous as the population has already increased in East Grinstead since then. According to MSDC's own figures the junction at Imberhorne Lane with the A22 will be at overcapacity in the next 10 years without any further house building and so now dismiss their own findings is inexplicable.

I live on the Imberhorne Estate and often cannot get down to the bottom of Heathcote Drive where it meets Imberhorne Lane due to the volume of traffic backing up from the A22. If it is raining, the traffic is even worse, particularly at school starting and finishing times.

Not only can we not get out of East Grinstead but we cannot get back in. The A264 regularly backs up to beyond Rowplatt Lane, especially at peak rush hour times.

Another 550 houses will potentially bring another 1000 cars to the area, so I cannot see how the suggestion that this development will not impact the roads around at all has been put forward.

Yours faithfully
Heather Byrne

[REDACTED]



Sender notified by
[Mailtrack](#)



2296

Site Allocations DPD: Main Modifications Response

Main Modification: MM2

ID: 22960
Response Ref: 2296/1/MM2
Respondent: Simone Johnson
Organisation:
On Behalf Of:

[REDACTED]

From: Simone Johnson [REDACTED]
Sent: 23 January 2022 21:23
To: Policy Consultation
Subject: Housing development Imberhorne Farm East Grinstead

[You don't often get email from [REDACTED] Learn why this is important at <http://aka.ms/LearnAboutSenderIdentification>.]

To whom it may concern

I am writing to raise grave concerns regarding the proposed development at Imberhorne Farm. I understand that there is a proposal for hundreds of properties to be built on this land.

I am seriously worried about this as Imberhorne Estate and the road junction between the A22 and A265 at Felbridge is already struggling to cope with the weight of traffic. I previously lived on Imberhorne Lane and witnessed the increase in traffic created by the development at the Oaks; the queues at Imberhorne Lane traffic lights increased greatly, as it backed up from Felbridge. Wherever possible I avoid those junctions during rush hour due to the sheer weight of traffic. In all honesty, I think that if that many more properties were built the two junctions would be gridlocked; traffic already backs up along the A22, A264 and Imberhorne Lane.

I am not the only person who tries to avoid those junctions. I have now moved to just off Heathcote drive on the Imberhorne Estate and am very concerned about the fact that this road is used as a rat run. Particularly in rush hour there is a lot of traffic going down that road often driving dangerously. Both of my children cross Heathcote Drive each morning and I have to cross them over to ensure their safety. Building more houses in the locality is only going to put more strain upon 'rat runs' like Heathcote Drive and increase the risk of an accident.

In conclusion, I fail to see how it makes sense to develop property in an area where there is already problems with traffic and traffic flow, at two nearby junctions. I am very concerned that this has either not been taken into account or has been ignored. Either way it will have a significant detrimental impact on the local roads.

Regards

Simone

2353

Site Allocations DPD: Main Modifications Response

Main Modification: MM2

ID: 23530

Response Ref: 2353/1/MM2

Respondent: Anne Lane

Organisation:

On Behalf Of:

[REDACTED]

From: Anne Lane [REDACTED]
Sent: 23 January 2022 18:33
To: Policy Consultation
Cc: David Lane
Subject: 200 homes in Felbridge 550 homes at Imberhorne Farm

[You don't often get email from [REDACTED] Learn why this is important at <http://aka.ms/LearnAboutSenderIdentification.>]

Dear Sir/Madam

I cannot begin to express my anger at the complete disregard for the infrastructure issues that this massive housing development raises.

The roads around this area already barely function with current traffic volumes and the deliberate decision by the planning officer to ignore this HUGE issue beggars belief! To the lay-man it can only be interpreted as "palms crossed with silver" as what other reason could there possibly be??

The developers suggest that 0.8 million pounds would improve this access crisis.....

A complete fairytale! And even if it were this minuscule amount of investment, they still wouldn't spend that - it took 5 years for The Oaks development to put a safe crossing and road calming in place on Imberhorne Lane, which was promised during construction.....

So, here we have it - an elected council who will allow and facilitate a development that will blight current and new residents lives, who will ignore previous planning officers opinions regarding the immediate, and significant problems with the current transport and road infrastructure, who will not answer for, or explain, their decisions and who choose money wielding conglomerates over the communities they represent. Go figure!!!

There is one more, small window of opportunity to do the right thing. Step up, behave with integrity, consider the realities of the infrastructure and represent the interests and the fears of the people you represent.

Mrs Anne Lane
[REDACTED]

Sent from my iPad

2383

Site Allocations DPD: Main Modifications Response

Main Modification: MM2

ID: 23830
Response Ref: 2383/1/MM2
Respondent: Paul Tucker
Organisation: Infrastructure First
On Behalf Of:

[REDACTED]

From: Paul Tucker [REDACTED]
Sent: 23 January 2022 15:30
To: Policy Consultation
Cc: [REDACTED]
Subject: Main Modifications Submission from InfrastructureFirst (Repsodent ID 2383)
Attachments: IFG Representation - Main Modifications DPD Consultation.docx

You don't often get email from [REDACTED] [learn why this is important](#)

Please find our submission in relation to the DPD main modifications consultation. We respectfully request that it is passed on to the Examiner in full.

Paul Tucker
On behalf of InfrastructureFirst

Before turning to specific modifications, Infrastructure First are hugely disappointed that the Examiner has not responded to legitimate concerns regarding the severe traffic situation in East Grinstead.

1. Existing traffic issues deemed not relevant
2. Impact on residential streets not considered
3. Cumulative impact not assessed
4. Up to date traffic evidence ignored
5. Committed highway schemes not implemented

1. Existing traffic issues not deemed to be relevant

The Competent Highway Authorities in West Sussex and Surrey and the District Planning Authorities in Mid Sussex and Tandridge ALL recognise and acknowledge the severe traffic problems in Felbridge and East Grinstead. In particular, that the Felbridge junction is already operating over capacity at peak times of the day.

Drivers using the A22 corridor into East Grinstead face significant delays during much of the day due to congestion at the Felbridge, Imberhorne Lane and Lingfield Road junctions ... and this is BEFORE the traffic from the 1,400+ homes already committed in and around East Grinstead start to have an impact on the network.

Mid Sussex District Council insist that the serious traffic issues are not a reason to resist further large scale housing close to the main bottlenecks; arguing that the severe congestion is an existing situation. They simply say that the DPD allocations SA19/SA20 will have limited practical impact on the already congested network.

The Council's position is untenable for two reasons ...

2. Impact on residential streets has not been considered

Firstly the Council ignore the impact of drivers avoiding long queues at junctions by rerouting along residential streets unsuited to through traffic. These routes were not included within the remit of the Strategic Transport Study and therefore not considered. The Competent Highways Authority describes the inevitable increase in rat-running as the result of SA19/20 as 'undesirable'.

The Inspector presiding over the appeal for a scheme of 100 houses adjacent to SA20 (APP/D3830/A/10/2142385) was more forthright, in saying that ...

"Locally, peak-hour congestion on the A22 leads to the use of Imberhorne Lane as a cut-through to the B2110 and as part of a rat-run through the Imberhorne Estate to the town centre. The amount of traffic on the lane leads in turn to congestion on it and this, along with rat-running and traffic speeds can only be to the detriment of the safety of local residents and road users."

This was not a recent statement. It was made than 10 years ago when there were nearly 1,800 fewer houses and substantially less traffic on the roads in East Grinstead.

Since that time, the National Planning Policy Framework (NPPF) has been updated to require planning authorities to consider whether impacts on highways safety are acceptable or not. There is no evidence to suggest that the Council have given ANY consideration to either capacity or safety impacts on parts of the network not covered by their Strategic Transport Study.

3. Cumulative impact has not been assessed

Secondly the Council cannot legitimately dismiss the traffic problems as an existing situation. The National Planning Practice Guidance (NPPG) most up to date advice on Transport Evidence in Plan Making [Paragraph: 03 Reference ID: 54-003-20141010] makes clear that decision makers should "*consider the cumulative impacts of existing and proposed development on transport networks.*"

There are over 8,500 homes committed in the district, many of which are already approved for development. This includes 1,400 in and around East Grinstead alone. None of these have been considered in combination with the allocations in the DPD when assessing the traffic impact.

This cannot be correct.

A 'cumulative' impact is one that increases by successive additions. It is the combined impact of all things added together.

Mid Sussex District Council only assess the incremental traffic impact of the DPD site allocations and have therefore not followed the process required by the NPPG. This approach is therefore also in conflict with the 2021 NPPF paragraph 111.

It is not sufficient just to assess all the DPD site allocations together ... if 'cumulative' is to mean anything at all, its proper interpretation dictates that the DPD allocations need to be assessed TOGETHER with development schemes already in the pipeline. This is the only way to assess the real impact of traffic joining the road network in the future and it is the method prescribed by the NPPG.

The Council's position has striking similarities with the appellant's case in the Land at Kidnappers Lane Recovered Appeal [APP/B1605/W/14/3001717]. The Appeal Inspector rejected the appellant's case that the existing situation can be disregarded and reaffirmed that it is the cumulative effect of all expected development which must be taken into account.

The Secretary of State agreed with the Appeal Inspector and a legal challenge mounted by the developer was dismissed by the High Court (see Appendix 1 for the salient details).

Despite failing to assess the cumulative impact, Mid Sussex District Council confidently say that there is no evidence to demonstrate there would be serious traffic issues in relation to SA19/20.

The Council's own matter statement (msdc-02f-miq-matter-6) describes how the traffic impact of the DPD allocations was assessed on its own and NOT in combination with other committed development. We were greatly encouraged by the Inspector's question to the Council asking whether "the cumulative impact should be the determining factor in assessing traffic impact?". The Council's response reaffirmed the requirement to test a cumulative impact but then described a process in which it wasn't tested!!

By assigning the very significant quantum of committed development to the Reference Case and comparing

the overall traffic impact against the DPD Allocations PLUS the Reference Case; the impact of the committed development was simply factored out of the equation.

We were disappointed that the Inspector failed to pick up on this.

Notwithstanding the failure to correctly assess the 'cumulative' impact, the Council's Reference Case predicts that all the primary junctions in and around East Grinstead will be operating over capacity. The extent of this over capacity is understated ... not only as the result of baseline junction capacities being under recorded but also due to the committed development tested in the Reference Case NOT being updated to reflect the published commitments to April 2021.

There is no obvious justification for this.

4. Up to date traffic evidence has been ignored

The Council also, somewhat cynically, refuse to include the most up to date and reliable traffic data for the Felbridge junction in their evidence base. The results from the detailed traffic survey, which they jointly commissioned, were available prior to the regulation 18 consultation and showed that the junction was already significantly over capacity at that time.

The Council say that the WSP investigation is still in draft form as no workable junction improvement options have been identified. However this cannot reasonably apply to the underlying traffic survey, which was based on observations at the time and therefore neither sensitive nor work in progress. Surrey Highways, who jointly commissioned the survey have recently released the detailed traffic data into the public domain.

In responding to the many calls for the 2018 WSP traffic survey results to be included in the DPD evidence base, the Council simply say in Appendix 9 of the Regulation 22 Summary, that the WSP study is not relevant.

A statement that was not reasoned.

Once again, we were encouraged by another of the Inspector's initial questions which asked the Council to explain "the principal conclusions of the WSP study". In their response (msdc-02f-miq-matter-6), the Council failed to mention the study's material findings on junction capacity. Instead they said that the WSP study is not required to address the impact of the DPD and therefore of no direct relevance and that no conclusions could be drawn from the study.

This is clearly NOT true.

Even the most casual observer could conclude that the WSP study found that the Felbridge junction was operating well over capacity as early as 2018.

When asked to explain why their calibrated transport model was so wide of the mark when predicting the Felbridge junction baseline capacity, the Council simply say that the SATURN modelling used for the district-wide study had a different purpose to the detailed LINSIG modelling designed for individual junctions. While this must be correct, it must also bring into question the reliability of the model validation.

The Council stopped short of addressing this question!

We are therefore left to conclude that the Council simply found the WSP findings inconvenient ... in that they undermined the findings of the Strategic Transport Study relied upon to support the DPD.

As a consequence of the WSP traffic evidence being ignored, the District Council along with their Competent Highways Authority are liable to be challenged over not properly validating the transport model.

We don't know whether the obvious flaws in the Strategic Transport Model disguised an otherwise severe impact on the road network in East Grinstead. But without a 'severe impact' the DPD is not required to deliver any highways mitigation ... which in turn means that any developer funded road improvements are 'nice to have' and not an essential condition of SA19/20 going forward.

The Strategic Transport Study does however acknowledge that significant mitigation of the A264/A22 would be required to significantly reduce the congestion at the Felbridge junction and that to be fully effective would require land outside the highway boundary.

But if, as usually turns out to be the case, there are no practical or cost effective solutions identified or that there is simply insufficient funding to deliver a solution, then the roads will stay as they are and the traffic from SA19/20 will simply add to the unacceptable levels of congestion and rat-running.

For both regulation 18 and 19 consultations, West Sussex Highways acknowledged that local junction improvements may not be deliverable and requested the District Council to update the DPD to reflect this.

However, these requests were ignored without explanation.

5. Committed highway schemes have not been implemented

The following committed highway improvements for the Felbridge and Imberhorne junctions are overdue with little prospect of delivery ...

- Synchronisation of signals at Felbridge and Imberhorne Lane junctions were developer funded and a condition of West Sussex Highways withdrawing their highways objection to the Oaks development in 2011 – Surrey Highways have confirmed that the synchronisation has not occurred due to technical difficulties and is likely to be unworkable as the result of flow interruptions due to bus stops, side roads etc.
- Reconfiguration of the Felbridge junction A264 approach arm for both lanes to turn right towards East Grinstead has been used as mitigation for several large schemes – Surrey Highways do not support this scheme and confirmed that it has been tried before but immediately withdrawn due to an unacceptable increase in collisions.
- In the last 10 years, several large schemes have made substantial contributions towards the cost of the Atkins Stage 3 junction improvements to help offset the impact of additional traffic. These highway interventions have been factored into the Council's strategic transport models since 2013, but West Sussex Highways say that there is still no timetable for their implementation.

To ensure that effective traffic mitigation is actually delivered, we respectfully ask the Inspector to consider making it a condition of approving SA19/20.

Appendix 1 - High Court Ruling re: Residual Cumulative Impact

In August 2014, the planning committee for Cheltenham Borough Council refused a planning application by Bovis Homes in respect of a residential development of 650 homes. This was against the advice of planning officers and the local highways authority didn't raise any objections to the scheme.

The decision notice lists unacceptable traffic congestion as one of the reasons for refusal.

Bovis Homes appealed the decision and a public inquiry took place in September 2015. They argued that detailed transport studies showed that the local roads were already severely congested but that the additional traffic wouldn't make things much worse ...

- *"there would be limited practical difference in terms of traffic impact on the local road network whether or not the appeal scheme proceeds"*
- *"The highways network around the site suffers some congestion but the NPPF test is whether the additional impact of a scheme would be severe"*
- *Shurdington Road is already overloaded. Existing traffic on Shurdington Road would be displaced onto other routes by traffic from the development*

The Council employed consultants to review the transport work supporting the scheme and argued that ...

- *"In limited time, the review identified faults in the transport analysis. More time would have uncovered more faults. A defensive response to criticism and a lack of transparency engenders suspicion that there is something to hide."*
- *"Traffic forecasting and modelling was undertaken using the Council's SATURN based model. It is not inherently unreliable but it is a strategic model, outputs from which need to be adjusted to obtain the detail relevant to consideration of this development. There are concerns about its accuracy for this purpose."*

The appeal inspector rejected the developer's arguments and in January 2016 gave his reasons ...

- *"It is an often-expressed view that development should be expected to do no more than 'wash its own face' and not solve all existing unrelated problems. In relation to transport, that appears to be the view of the appellant, the local authority and the local highway authority."*
- *"The third bullet of NPPF paragraph 32 refers not to the additional impact of a scheme, as the appellant asserts but to residual "cumulative" effects, implying that it is the cumulative effect of all expected development which must be taken into account, rather than the individual contribution of each development in turn, which is likely to be (as in the present case) marginal."*
- *"Whilst I can agree therefore, that the development should not need to solve all existing unrelated transport problems, the existing or future "in any event" situation on the highway network, is not an unrelated problem which evaluation of the proposed development should ignore. It is a related problem which is highly pertinent to the evaluation of the current appeal proposal."*

Due to the strategic nature of the Bovis Homes scheme, the Secretary of State intervened ... upholding the view of the appeal inspector and dismissing the appeal in May 2016.

In his judgement he agreed with the Inspector's analysis of highways issues ...

- *Overall, he agrees with the Inspector that, taking account of the measures which are included in the s106 agreement, the residual cumulative effects of development proposed would increase demand for use of sections of the highway network which are already operating at over-capacity levels, contributing to a severe impact on a wider area of Cheltenham as traffic is displaced, contrary to both adopted and emerging policies. Paragraph 32 of the Framework states that development should only be prevented or refused on transport grounds where the residual cumulative impacts of development are severe.*
- *The Secretary of State concludes that granting permission for the appeal scheme would be contrary to the development plan overall due to the severe residual cumulative transport impacts.*

Bovis Homes challenged the validity of the Secretary of State's decision on a misinterpretation of 'Residual Cumulative Impact' and applied to High Court to overturn it.

In September 2016, Mr Justice Holgate presided over a hearing to consider whether there was a case to answer.

He was not persuaded that the Inspector and Secretary of State erred in law by taking into account of the existing highway situation when resolving the paragraph 32 NPPF questions. In particular, the Judge noted that it would be open to a decision taker to rationally conclude that a given development could wash its own face in highway impact terms, but due to existing over capacity, the residual cumulative impacts of the development could be severe.

- *"The conclusions of the Inspector and the Secretary of State adverse to the Bovis proposal rested on the third bullet point of NPPF paragraph 32, the second half of which is the relevant provision. It reads: "Development should only be prevented or refused on transport grounds where the residual cumulative impacts of development are severe."*
- *"He recorded in paragraph 221 the view of Bovis Homes and also the local authority and the County Council, that the development should be expected to do no more than "wash its own face" and not solve all existing unrelated problems. He contrasted that with the position of third parties pointing out that the existing situation into which the development would be placed is already not suitable in terms of highway capacity and that the future situation would be far worse, and therefore even less acceptable, as a location for the development of 650 dwellings."*
- *"Taking up the third bullet point of NPPF paragraph 32, the Inspector pointed out in paragraph 223 of his report that the Framework refers not simply to the additional impact of the scheme, as had been asserted by the appellants, but to residual "cumulative" effects, implying that it is the cumulative effect of all expected development which must be taken into account in context rather than just the individual contribution of each development in turn which is likely to be, as in the present case, marginal."*

- *"In view of his earlier reasoning there was no need for the Inspector to rely in addition upon circular 2/2013, but it did serve to emphasise that the existing levels of congestion were relevant, and not irrelevant as some parties had contended, to determining whether there would be severe residual cumulative impacts in breach of paragraph 32 of the NPPF if the proposed development were to go ahead."*
- *"Furthermore, and in any event, it is also plain from paragraphs 14 and 32 of the Secretary of State's decision letter that he correctly applied the "severe residual cumulative impact" test in the NPPF and not any different test. It cannot be said that the decision-maker has misinterpreted paragraph 32 of the NPPF. Nor can it be said that in using his judgment regarding the application of that test, he has misapplied it in such a way as to be open to challenge on public law grounds"*

The High Court rejected the challenge and in doing so made an important ruling on the correct interpretation of the National Planning Policy's meaning of residual cumulative impacts of development.

<https://www.bailii.org/ew/cases/EWHC/Admin/2016/2952.html>

MM16 – Updated Housing Trajectory

The primary objective of the DPD is to meet the residual housing need identified by the District Plan Examination in 2018 and to allocate sufficient housing sites to address the residual need for the district between 2024 and 2031.

The regulation 18 version of the DPD confirms the residual need to be 1,507 homes ...

"2.25 The revised housing supply figures set out in Table 2.3, illustrates that following consideration for updated completion, commitments and windfall figures that the residual currently necessary to fully meet the district housing requirement is 1,507 dwellings as at April 2019."

The regulation 19 version of the DPD shows that the residual need had reduced by 227 ...

2.29 The revised housing supply figures set out in Table 2.3, illustrates that following consideration for updated completion, commitments and windfall figures that the residual currently necessary to fully meet the district housing requirement is 1,280 dwellings as at 1st April 2020.

And the latest main modifications version of the DPD shows the residual need had fallen by a further 483 ...

2.29 The revised housing supply figures set out in Table 2.3, illustrates that following consideration for updated completion, commitments and windfall figures that the residual currently necessary to fully meet the district housing requirement is 797 dwellings as at 1st April 2021.

So in the two years it has taken to progress the DPD to the Main Modification stage, the number of houses it set out to allocate has officially reduced by very nearly half, from 1,507 to 797 homes.

This excludes the new homes approved in the 10 months since April 2021.

Of course there is no justification for ignoring these latest approvals in the latest version of the DPD as the Council will be fully aware of them. Using the information published on the Council's website we have reviewed the planning approvals since April 2021 and excluded those already included in the published list of housing commitments (MSDC-06b).

We have calculated the up to date residual need is now around 400 homes ... which leaves us with the very probable conclusion that the uplifted trajectory will be fully met by 2024/25 without needing to allocate any further schemes in the DPD.

However, the main modification version of the DPD still allocates schemes for a total of 1,704 homes. This represents an official oversupply of 907 as at April 2021 ... and using up to date figures, an oversupply nearer to 1,300.

Despite the Council's position stated during the public hearings that they do not accept the need for a buffer due to the robustness of their housing commitments; some level of oversupply is clearly prudent.

Tests of soundness require the Plan to be proportionate and justified. We don't believe that a fourfold oversupply meets these tests ... especially as there are very legitimate arguments which bring into question the sustainability of the 750 homes allocated at SA19/SA20.

MM22 – SA20 SANG monitoring

First of all it is worth reiterating that the residual housing need identified at the examination of the District Plan was made conditional on there being no further harm to the integrity of European Habitat Sites in Ashdown Forest. This was clearly stated in paragraph 65 of the Inspector's final report dated 12th March 2018.

The Council have not presented any evidence to demonstrate that allocations in the DPD would not result in further harm to the Ashdown Forest SPA.

Main Modification MM22 adds wording relating to SANG provision and mitigation by adding a requirement for regular monitoring of the proposed SANG. However, The District Council are already committed to monitoring the effectiveness of their SANG mitigation under DP17 ... and therefore MM22 is somewhat superfluous.

Of course, committing to regular SANG monitoring doesn't mean that it will happen. Despite a similar commitment to regular monitor the existing Ashplats Wood SANG, no monitoring had been undertaken since becoming operational in 2015. Although the latest Habitats Regulation Assessment (HRA) says that visitor surveys have now been undertaken following the examination hearings in June.

One of the Council's post-hearing actions was to demonstrate the effectiveness of their existing SANG mitigation; but their response (MSDC13) was far from compelling and presented no evidence to show that the Ashplats Wood SANG had been successful in reducing visitor pressure on the Ashdown Forest SPA.

The Council clearly believe that SANG effectiveness is a forgone conclusion.

We submitted our own response (REP2383-010) highlighting the lack of evidence in the Council's post-hearing written submission and we are disappointed that our concerns have been apparently dismissed.

A further commitment to regularly monitor the proposed SANG as set out in the MM22 is clearly welcome; but what if monitoring shows that the SANG isn't successful in reducing visitor pressure from new development?

The Habitats legislation is clear that decision makers are required to apply the precautionary principle in evaluating adverse impacts on a protected site. In simple terms this means that it is 'better to be safe than sorry'. This surely mandates that approval of sites SA19/20 should depend upon the results of the visitor surveys carried out in June.

The Council have currently no evidence to demonstrate the success of their Ashdown Forest mitigation strategy and it would be premature to allocate SA19/20 prior to the forthcoming publication of the evidence provided by these visitor studies.

Indeed the approval of large scale housing within the accepted zone of influence with no evidence to support the HRA claim that adverse impacts can be ruled out is potentially open to legal challenge.

Dear Minister,

I write to you on behalf of the Infrastructure First Campaign Group, supported by over 1,500 residents in Felbridge and East Grinstead.

We would be grateful for your clarification on the interpretation of **cumulative** in the context of the NPPF sustainable transport paragraph, and in particular its application in local plan making.

"111. Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe."

We are not asking for clarification on the definition of **severe**, as this is a subjective term. We are aware that the DCLG have already made clear in responding to an FOI¹ that ... *There are no plans to give further guidance on what constitutes a "severe" impact.* This allows decision makers to use their discretion in their interpretation of it.

However, we do not believe that such discretion is appropriate to the interpretation of **cumulative**, which in simple terms means something that increases by successive additions ... a combination of all things added together.

As a starting point, we have reviewed what we understand to be the most pertinent and up to date guidance:

What the NPPG says ...

The guidance for transport evidence in plan making and decision taking [Paragraph: 003 Reference ID: 54-003-20141010²] under the heading "What key issues should be considered in developing the transport evidence base to support the Local Plan", requires decision makers to ...

"consider the cumulative impacts of existing and proposed development on transport networks."

1

https://www.whatdotheyknow.com/request/304126/response/743493/attach/2/Response%20some%20not%20held.pdf?cookie_passthrough=1

² <https://www.gov.uk/guidance/transport-evidence-bases-in-plan-making-and-decision-taking>

While this section offers no help as to how decision makers should determine a cumulative impact, it nevertheless acknowledges that they should consider both existing and proposed development in its determination.

Furthermore, the NPPG refers decision makers to the DfT circular 02/2013: The Strategic Road Network and the Delivery of Sustainable Development.

What DfT circular 02/2013 says ...

In the section on the Assessment of Development Impact³, it states that ...

"25. The overall forecast demand⁷ should be compared to the ability of the existing network to accommodate traffic over a period up to ten years after the date of registration of a planning application or the end of the relevant Local Plan whichever is the greater. This is known as the review period.

⁷ The overall forecast demand will be the existing flow plus traffic likely to be generated by development already committed, plus traffic likely to be generated by the development under consideration, less any reduction arising from any travel plan or demand management measures that are being proposed."

Therefore, decision makers assessing the traffic impact of development plans should take account of traffic from proposed development in the plan together with traffic from committed development already in the pipeline.

While we consider both the NPPF paragraph 111 and the supporting guidance to be clear in meaning, there is clearly room for confusion.

What the LPA says ...

As part of the ongoing examination into the Mid Sussex DPD, the Inspector asked the LPA to answer the following question ...

"Is it acceptable/good practice for the highways impact of a scheme to be considered less than severe if the existing traffic conditions in the area, which admittedly not the result of the proposed allocation, are acknowledged to be severe; in other words, should the

3

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/237412/dft-circular-strategic-road.pdf

cumulative impact be the determining factor in assessing traffic impact in relation to the impact of a specific housing allocation?"

While the LPA did not specifically answer the question, it did describe how it met the **cumulative** impact requirement in paragraphs 3.10 to 3.15 of its response⁴.

We have reviewed the LPA's response and in simple terms, it assessed the impacts of its DPD on the road network by 3 separate determinations ...

1. A baseline future demand using existing traffic flows and including the expected traffic flows from committed development [the **Reference Case**]
2. A DPD future demand by adding the expected traffic flows from allocations under consideration to the Reference Case [the **Development Case**]
3. Whether any part of the road network suffered a deterioration in performance sufficient to be considered severe, by comparing the **Development Case** with the **Reference Case**

In its response, the LPA confirmed to the Inspector that it had undertaken a **cumulative** assessment of the DPD's traffic impact ...

"The assessment of the Sites DPD development is cumulative as it assesses the proposed allocations in the plan on top of existing allocations and approved development with their associated committed highway and transport network changes."

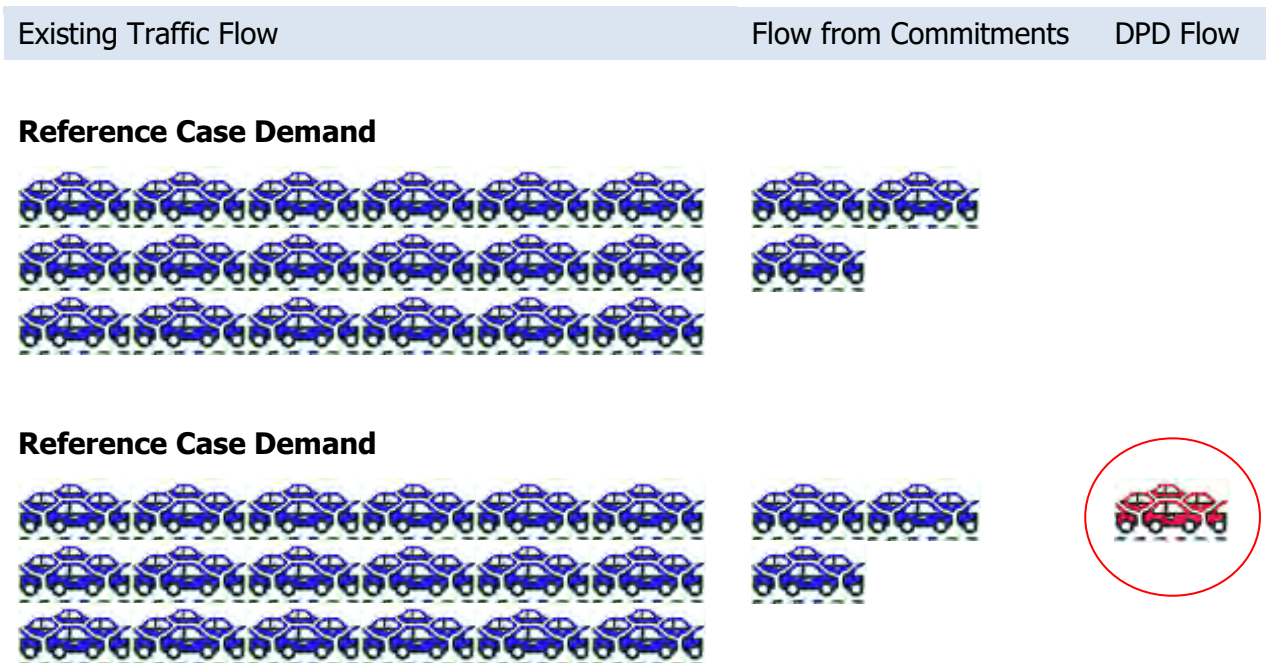
We don't see how the LPA could have come to this conclusion.

A **cumulative** assessment would have taken account of the DPD allocations 'alongside' committed development and not 'on top of' it. The LPA's approach to taking account of committed development was successful only in nullifying the attendant traffic demand.

Furthermore its response acknowledges that the traffic demand from committed development has been assigned to the baseline; meaning that any deterioration in network performance could only be attributed to the marginal impact of the DPD traffic flows ...

⁴ <https://www.midsussex.gov.uk/media/6806/msdc-02f-miq-matter-6.pdf>

"3.12 The 'Reference Case Scenario' represents the road network at 2031, and includes any committed highway infrastructure, development in the district and background growth up to this date. This acts as the baseline when assessing the impacts of the Sites DPD development scenarios."



If **cumulative** impact is to mean anything at all, we assume that it must mean traffic demand beyond the traffic generated by the DPD itself.

In recovering the Kidnappers Lane Appeal in 2016⁵ the Secretary of State endorsed the Inspector's interpretation of **cumulative** impact with key points of the ruling covered by these paragraphs ...

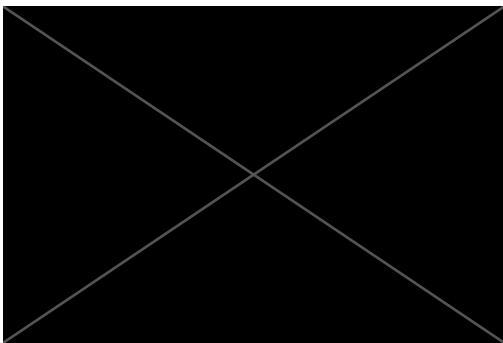
223. But the third bullet of NPPF paragraph 32 refers not to the additional impact of a scheme, as the appellant asserts but to residual "cumulative" effects, implying that it is the cumulative effect of all expected development which must be taken into account, rather than the individual contribution of each development in turn, which is likely to be marginal.

224. National Planning Practice Guidance also refers to the cumulative impacts of multiple developments within a particular area when determining the need for a transport assessment of a proposal. It also advises that it is important to give appropriate consideration to the cumulative impacts arising from other committed development at the decision-taking stage.

⁵ https://www.cheltenham.gov.uk/downloads/file/7923/h3i_-_appb1605w143001717_land_at_kidnappers_lane_leckhampton_dated_552016

Therefore to avoid further confusion could the Minister please confirm that ...

1. We have identified the most up to date and pertinent guidance published by the Government, and if so, whether we have correctly interpreted its intention?
2. In responding to the Inspector in paragraph 3.12 of its matter statement, the LPA has correctly assessed the **cumulative** traffic impact of its DPD and, if you consider this to be the case, how you have reached this conclusion?



Paul Tucker

On behalf of Infrastructure First

infrastructurefirst.co.uk

[REDACTED]

From: Jackie Howe [REDACTED]
Sent: 10 January 2022 18:13
To: planninginfo
Cc: [REDACTED]
Subject: Impact of proposed housing developments on road infrastructure
Categories: Laura to move

You don't often get email from [REDACTED] [Learn why this is important](#)

Dear Sirs

It is hugely concerning to my husband and I that MSDC and WSCC are proposing yet more huge housing developments around Crawley Down, Felbridge/East Grinstead. We have lived in Crawley Down for nearly 40 years and already tend to order anything we need via the internet, rather than always risk the busy roads between Felbridge and East Grinstead town, the town is going to miss out on so much trade for surrounding villages with the impact to all, from more and more traffic on these already congested roads, due to more and more houses going up, it could be the death of East Grinstead town for traders there.

We therefore ask you to carry out "**Transport Assessments**" for all new developments in particular taking in to account the impact on the local road networks and junctions, NOT just the strategic road network. THIS NEEDS LOOKING INTO URGENTLY, WITH THE DEVELOPMENTS CURRENTLY BEING CONSIDERED.

Yours faithfully

Jacqueline and John Howe



2473

Site Allocations DPD: Main Modifications Response

Main Modification: MM2

ID: 24730

Response Ref: 2473/1/MM2

Respondent: Jacqueline and John Howe

Organisation:

On Behalf Of:

2478

Site Allocations DPD: Main Modifications Response

Main Modification: MM2

ID: 24780
Response Ref: 2478/1/MM2
Respondent: Andrea Cameron
Organisation:
On Behalf Of:

[REDACTED]

From: Andrea Cameron [REDACTED]
Sent: 13 January 2022 15:24
To: Policy Consultation
Cc: [REDACTED]
Subject: REF SA19 FELBRIDGE

Some people who received this message don't often get email from [REDACTED] [learn why this is important](#)

Good Afternoon

I am a resident in Felbridge my address being [REDACTED]

Having recently moved into the area in October choosing this area over a wide spread search as we loved the rural feel and countryside being so close particularly on our door step.

We found out within a week of moving in from neighbours Barratt homes were planning 200 houses behind us and the main entrance would be a road directly behind our garden was quite alarming and stressful to say the least.

Our solicitor has since advised this would not have shown with the local searches as it had not been submitted but the council were aware of these plans so I find this so alarming none of this would be alerted in purchasing this property – this would have had such a big impact on our choice moving to this area.

Since living in the area for a few months I would like to air my concerns to the traffic congestion this development would have on the local area.

On my commute I have to turn on to Corpthorne Road from Crawley Downs Road and most mornings 7.45am have to wait to turn out for at least 5 minutes on a good morning.

How an earth can this road take any more traffic when in the local area there are two new housing developments currently unfinished so these will have an additional impact to the area.

Local roads have pot holes and been repaired badly from work relating to the current two developments underway currently.

Please take into account how this development SA19 and SA20 would have on Felbridge and changing a lovely village into a big town how can permission be granted – I guess pound signs got the better of the council.

Only living in the area for a few months I am so worried the impact this will have on my commute to work and general traffic in the area.

To be honest I always avoid going into East Grinstead as the A22 always is congested both ways so this will only get worse not a very reassuring thought.

Please could you reconsider and keep Felbridge the small village we all love.

Kind regards

Andrea Cameron

Andrea Cameron

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2480

Site Allocations DPD: Main Modifications Response

Main Modification: MM2

ID: 24800

Response Ref: 2480/1/MM2

Respondent: Joseph Johnston

Organisation:

On Behalf Of:

[REDACTED]

From: Joe Johnston [REDACTED]
Sent: 14 January 2022 11:41
To: Policy Consultation
Cc: [REDACTED]

Subject: AGAINST the 750 new homes proposal

[You don't often get email from [REDACTED] Learn why this is important at <http://aka.ms/LearnAboutSenderIdentification.>]

To whom it may concern,

I would like to place on record my concern and disapproval at the approved council planning for an additional 750 homes to be built at Imberhorne Farm & Felbridge.

There are already serious issues with volumes of traffic and a threat to public safety. This will only make it worse.

I would strongly argue that the infrastructure in the area is already at its limit (Schools, GP surgeries, local amenities etc) as well as the aforementioned traffic problems.

I implore you reconsider this decision. This is a fantastic area to live in and it has the correct balance of countryside and wildlife as well as urban living.

It is generally a safe community and on a personal level a wonderful place to raise young children.

Please use your power and influence to think of the future generations and their safety. Do the right thing.

Kind regards

Joseph Johnston
Local Resident

Sent from my iPhone

2481

Site Allocations DPD: Main Modifications Response

Main Modification: MM2

ID: 24810
Response Ref: 2481/1/MM2
Respondent: Bob Charles
Organisation:
On Behalf Of:

[Redacted]

From: Bob Charles [Redacted]
Sent: 14 January 2022 10:39
To: Policy Consultation
Cc: [Redacted]
Subject: SA19 Felbridge

Some people who received this message don't often get email from [Redacted] [Learn why this is important](#)

To whom it may concern,

As a new resident to the area, having moved from London for a quieter pace of life and less chaotic surroundings, we eventually chose our property in Felbridge for the peace and tranquility that it offered. Not to mention the natural landscape and wildlife associated with such an area of natural beauty.

Having recently found out that there are proposals afoot to develop the land to the side of my new house and also the house directly behind being demolished to be used for the road into and out of the proposed development, you can imagine my anger at these proposals not only for my personal upset, stress and detrimental affect to my mental well-being, but also for the blot on our beautiful fields which will now be a building site for several years prior to becoming a rather horrid & busy housing estate in a tranquil sleepy village.

The infrastructure for the amount of vehicles that will be descending upon our village is simply nowhere near robust enough to cope with all the additional volumes generated.

I would like to think that due to this major disruption to our neighbourhood and safety of its residents, that proper thought and surveys are carried out to monitor the additional resources needed for transport, hospitals, dentists, schools etc.... this seems to have been rushed through without a care for the safety and annoyance of residents and I would also suggest from the virtual meeting, this seems to have had a "light touch" to the actual impact of the traffic volumes and movements. To be informed these additional 250 houses will only create 100 additional car movements a day is naïve and uninformed. The average house hold in the UK has 1.2 cars per residence so assuming this number will be less than half the cars potentially on the estate is ridiculous.

This seems like another hair brained scheme, rushed through councils (not always with the best intention of the community in mind) for the financial gain of property developers, who return to their country piles well away from the carnage caused by their companies to fatten their wallets further.

I assume there will be calls for a full EIA to be completed and hopefully a sensible decision to stop this estate being built for the sales of residents sanity and the greater good of the community in general.

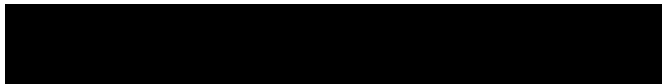
Regards
Bob

Bob Charles.
[Redacted]

Bob Charles

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2482

Site Allocations DPD: Main Modifications Response

Main Modification: MM2

ID: 24820

Response Ref: 2482/1/MM2

Respondent: Andrew Picton

Organisation:

On Behalf Of:

From: ANDREW PICTON [REDACTED]
Sent: 13 January 2022 18:40
To: Policy Consultation
Subject: Proposed Imberhorne Housing development

Follow Up Flag: Follow up
Flag Status: Completed

You don't often get email from [REDACTED] [learn why this is important](#)

Hello

I have been a resident of East Grinstead living on the Imberhorne Estate for 15 years.

I am totally against this development as the traffic congestion in East Grinstead is ridiculous. The Felbridge Lights and going into the town at A22 Lingfield Road roundabout is always congested.

Reading a report from infrastructurefirst.co.uk it seems that data is being misinterpreted or not looked at to understand the congestion problems with have at the moment. I believe in the developers report it was stated "the traffic in East Grinstead is bad so extra cars would not make any difference as it is bad already." I think that is a terrible way to deal with existing residents and even proposed new residents.

As well as traffic we do not have a reliable and regular public transport system from the station and buses, also the job opportunities in East Grinstead require employees to travel to local towns Crawley and Tunbridge Wells which can take over an hour during rush hour at present what will this change to if the proposed housing is agreed - it will be horrendous and unacceptable to residents commuters and air pollution.

I am so against this proposal for housing East Grinstead does not have the road infrastructure to deal with the existing cars on the road and the public transport is unacceptable.

We do not need this huge development and they may even not be the demand for this housing and buyers may not choose this area because of our congested roads and public transport.

Please reconsider your plan East Grinstead do not want this development.

Can you please advise me of the developers email contact as I think they should understand the reality of living in East Grinstead and how dreadful this development would be.

Mrs Kay Picton, Mr Andrew Picton, Miss A Picton Mr S Picton and Miss L Picton

2483

Site Allocations DPD: Main Modifications Response

Main Modification: MM2

ID: 24830

Response Ref: 2483/1/MM2

Respondent: Simon Topley

Organisation:

On Behalf Of:

[REDACTED]

From: Simon Topley [REDACTED]
Sent: 13 January 2022 09:42
To: Policy Consultation
Subject: Housing Development in and around Felbridge and Imberhorne Farm

Follow Up Flag: Follow up
Flag Status: Completed

Categories: SITES DPD MM

[You don't often get email from [REDACTED] Learn why this is important at <http://aka.ms/LearnAboutSenderIdentification.>]

Dear Sir,

I am writing to express my concerns about the continued development in and around my local area. Particularly the 750 new houses planned on the green space in and around Imberhorne Farm and the 'Gullege'.

I live in Wheelers Way Felbridge and have been a resident since March 2000.

In that time there has been a significant number of new houses built but no investment in the local infrastructure. The A264 and A22 junction has become so busy that at peak times the cars queue back beyond Rowplatt Lane. Any highway/roadworks that affect the A22 (of which some are currently underway towards East Grinstead) results in this area becoming almost impossible to negotiate.

The Crawley Down Road then becomes a 'rat run' as people try to avoid the congestion. I often have to take 'the long way round' through Crawley Down and via Turners Hill to get to East Grinstead. Similarly, if heading north, to where I work in Oxted, I may have to detour via Snowhill and the Newchapel Road.

One development in Felbridge will have the access road coming out onto the Crawley Down Road. This will just exacerbate the traffic problems especially the junction of the Crawley Down Road and the A264. This junction is already a difficult one to exit onto.

The roads are not the only issue. My children were in the catchment area for Felbridge school when we first moved here but now would be excluded. This is even though we are only about half a mile from the school, as there are now so many more new houses/families present.

My father in law recently moved to East Grinstead and was told that the doctors surgery closest to him would not be able to accept him. He was only able to get on the list because he had made an enquiry the previous year before his move went through.

Lastly, the area around the 'Gullege' in Felbridge, where I believe 200 new houses are to be built, is a green space. The fields are home to many animals including deer. It used to be a regular sight that there would be deer in this area but in the last few years I have seen these less and less. I regularly walk this area and it is nice to be able to have this space easily accessible and to feel like you are in the countryside.

Even if the footpath is still present, walking through a housing development and crossing the access road that will be built across the 'Gullege' is not going to feel the same as walking a country path. I believe this will spoil the area for many including ramblers, dog walkers, cyclists and horse riders as it is also a bridle way.

I appreciate that there is a need for new housing but I strongly believe that there are sights elsewhere in West Sussex that are more suitable and that the building of these developments along the county border is not sustainable.

I believe that despite the lack of investment in infrastructure and the affect on the local environment, it suits some county councils to choose these inappropriate sites as it has less of an impact on the 'main residents' of their county.

Yours faithfully,

Simon Topley

Sent from Topley iPad 2

2484

Site Allocations DPD: Main Modifications Response

Main Modification: MM2

ID: 24840

Response Ref: 2484/1/MM2

Respondent: Ben Williams

Organisation:

On Behalf Of:

[REDACTED]

From: Ben Williams [REDACTED]
Sent: 12 January 2022 15:48
To: Policy Consultation
Subject: Planning Proposal Feedback

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Hi,

I am writing with regards the main modifications for the proposed developments at Imberhorne Farm and around Felbridge/East Grinstead/Crawley Down in general. To build another 750 or so houses in these locations will cripple the local road network. Its at capacity now with tailbacks at the A22/Imberhorne and A22/A264 lights reaching back for 45mins to an hour at rushhour on a normal day. Not ideal when we are trying to cut polution from cars! If there is any form of issue on the road network then delays go into the hours as there are no other ways around the A264/A22 and A22/Imberhorne Lane junctions. When I was a child at school around 30yrs ago we did a project on a bypass for East Grinstead as the roads were bad then and now year after year more and more developments are added and with something the scale of Imbherhorne Farm its just crazy to think the roads will cope with it.

Kind regards,

Ben Williams

2485

Site Allocations DPD: Main Modifications Response

Main Modification: MM2

ID: 24850
Response Ref: 2485/1/MM2
Respondent: Elaine Boot
Organisation:
On Behalf Of:

[REDACTED]

From: Elaine Boot [REDACTED]
Sent: 12 January 2022 15:07
To: Policy Consultation
Cc: [REDACTED]
Subject: East Grinstead Housing Proposal SA20 Land South and West of Imberhorne Upper School.

Follow Up Flag: Follow up
Flag Status: Completed

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Dear Sir or Madam,

I am writing to give my opinion on the impact of this development on road use and congestion.

I am a resident living at [REDACTED]

Pre-pandemic, on weekdays during the morning rush hours the traffic queuing down towards the Imberhorne Lane/A22 junction included:

1. Traffic queuing towards the A22 junction, as far back up Imberhorne Lane as the junction with Heathcote Drive.
2. Traffic queuing on Heathcote Drive because of the queues in 1, above, as far as or further than the mini roundabout junction with Gardenwood Road.
3. Traffic queuing up Gardenwood Road from the mini roundabout junction with Heathcote Drive, in 2, above. This is often as far uphill as the junction with Fairlawn Drive.
4. Traffic queuing in Fairlawn Drive at the junction with Heathcote Drive caused by 2, above.

Waiting times of over 20 minutes are not unusual during these times, aggravated by the access to Imberhorne School. There are also two primary schools in this area that generate their own amounts of extra traffic at this time.

I feel that this traffic congestion must be taken into account when considering the application to build homes on Imberhorne Farm. Extra homes with cars that must enter Imberhorne Lane before going anywhere else will only add to the levels of traffic, which will become extreme.

The safety of the students arriving at the schools will be impacted, as well. The levels of pollution caused by this much and more, queuing traffic is unhealthy for the residents and the students.

I feel that this application should be refused because of the concerns that I have stated. Homes on this site are wholly inappropriate at this time. I call on the Council to do the right thing and stop the application before the traffic levels on this side of East Grinstead become so much worse.

Yours sincerely,

Elaine Boot

2486

Site Allocations DPD: Main Modifications Response

Main Modification: MM2

ID: 24860

Response Ref: 2486/1/MM2

Respondent: Alexis Munro

Organisation:

On Behalf Of:

From: Alexis Munro [REDACTED]
Sent: 12 January 2022 11:06
To: Policy Consultation
Subject: Mid Sussex - SA20: Land South and West of Imberhorne Upper School

You don't often get email from [REDACTED]. [Learn why this is important](#)

Good Morning,

I just wanted to voice my concern with regards to the modifications published recently for the ongoing consultation for housing in Mid Sussex, particularly with regards to SA20 for the proposed Imberhorne development.

After reading through the modifications, I am troubled to see that there is no mention whatsoever of traffic issues in the area. As someone who drives through the junctions along the A22 at Imberhorne Lane and Copthorne Road, I can assure you first-hand that there is a serious ongoing traffic issue in East Grinstead, with both junctions regularly being over capacity. The queues along Imberhorne Lane often stretch all the way back to Kingscote Way (past the give way signs which only adds to the pressure) with queues along the Copthorne Road towards the A22 an even more serious issue. From experience, I have also spent upwards of 30 minutes queueing along Copthorne Road just to get to the traffic lights due to an overload of traffic in rush hour. This has even been the case in the last two years, when there were fewer people driving to and from Crawley/Gatwick along these roads for commuting purposes. Presumably, once a return to working from the office is fully in place, this will only continue to worsen.

I would therefore like to know the justification by which traffic was not raised as a consideration for the 550 house development at Imberhorne. With the proposed entrances to this site being located along Imberhorne Lane, I fail to see how this could possibly not lead to an even more serious traffic issue. Given that the traffic is located along a road on which a school is located, I cannot possibly understand how this has not been raised. It is crucial that you consider that traffic already regularly backs up to the point of one of the proposed entrances to the site. Adding an extra entrance here, with likely several hundred cars going in and out of the development, this absolutely has to be a health and safety concern. This point is even further exacerbated by the fact that the development plan includes an increase in size to Imberhorne School, along with a primary school on site. This would surely, by any measurement, lead to severe traffic issues along both Imberhorne Lane and the A22, with a high number of school children then in turn having to navigate this. Add in the general chaos of school drop-offs in the morning and it is a recipe for disaster. I have seen plenty of near-misses along Imberhorne Lane already, and am seriously concerned about the addition of a primary school just behind an already overloaded road.

It is, to me, a failure of the inspector to not give serious consideration to this issue, and I would appreciate it if this could be rectified as soon as possible. I would invite the inspector to see first-hand the traffic issues at rush hour (morning or evening) at the two previously-mentioned junctions along the A22. Something has to change here before a development can be approved - I am extremely concerned that these additions, without infrastructure improvements, would push the East Grinstead road network to a breaking point.

Alexis Munro
[REDACTED]

2487

Site Allocations DPD: Main Modifications Response

Main Modification: MM2

ID: 24870

Response Ref: 2487/1/MM2

Respondent: Matt Griffin

Organisation:

On Behalf Of:

From: Matt Griffin [REDACTED]
Sent: 12 January 2022 10:34
To: Policy Consultation
Subject: Mid Sussex - SA20: Land South and West of Imberhorne Upper School
Categories: Laura to move

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Good Morning,

I just wanted to voice my concern with regards to the modifications published recently for the ongoing consultation for housing in Mid Sussex, particularly with regards to SA20 for the proposed Imberhorne development.

After reading through the modifications, I am troubled to see that there is no mention whatsoever of traffic issues in the area. As someone who drives through the junctions along the A22 at Imberhorne Lane and Copthorne Road, I can assure you first-hand that there is a serious ongoing traffic issue in East Grinstead, with both junctions regularly being over capacity. The queues along Imberhorne Lane often stretch all the way back to Kingscote Way (past the give way signs which only adds to the pressure) with queues along the Copthorne Road towards the A22 an even more serious issue. From experience, I have also spent upwards of 30 minutes queueing along Copthorne Road just to get to the traffic lights due to an overload of traffic in rush hour. This has even been the case in the last two years, when there were fewer people driving to and from Crawley/Gatwick along these roads for commuting purposes. Presumably, once a return to working from the office is fully in place, this will only continue to worsen.

I would therefore like to know the justification by which traffic was not raised as a consideration for the 550 house development at Imberhorne. With the proposed entrances to this site being located along Imberhorne Lane, I fail to see how this could possibly not lead to an even more serious traffic issue. Given that the traffic is located along a road on which a school is located, I cannot possibly understand how this has not been raised. It is crucial that you consider that traffic already regularly backs up to the point of one of the proposed entrances to the site. Adding an extra entrance here, with likely several hundred cars going in and out of the development, this absolutely has to be a health and safety concern. This point is even further exacerbated by the fact that the development plan includes an increase in size to Imberhorne School, along with a primary school on site. This would surely, by any measurement, lead to severe traffic issues along both Imberhorne Lane and the A22, with a high number of school children then in turn having to navigate this. Add in the general chaos of school drop-offs in the morning and it is a recipe for disaster. I have seen plenty of near-misses along Imberhorne Lane already, and am seriously concerned about the addition of a primary school just behind an already overloaded road.

It is, to me, a failure of the inspector to not give serious consideration to this issue, and I would appreciate it if this could be rectified as soon as possible. I would invite the inspector to see first-hand the traffic issues at rush hour (morning or evening) at the two previously-mentioned junctions along the A22. Something has to change here before a development can be approved - I am extremely concerned that these additions, without infrastructure improvements, would push the East Grinstead road network to a breaking point.

Matthew Griffin
[REDACTED]

2488

Site Allocations DPD: Main Modifications Response

Main Modification: MM2

ID: 24880
Response Ref: 2488/1/MM2
Respondent: Barry Allen
Organisation:
On Behalf Of:

[REDACTED]

From: Barry Allen [REDACTED]
Sent: 12 January 2022 07:52
To: Policy Consultation
Cc: [REDACTED]
Subject: Infrastructure First

Categories: Laura to move

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Hello,

The roads on the Imberhorne estate in East Grinstead are being increasingly used as a rat run. Specifically Gardenwood Road and Heathcote Drive.

Cars are being parked on the grass verges on those two roads and when finally the Highways agency and the local Council decide to take action against these illegally parked vehicles, it will force these cars to park on the road in these areas creating further congestion with cars zigzagging through the estate.

The small parade of shops on Heathcote Drive is also creating a choke point. With the change of use of the shops, Extended opening hours, approval of Alcohol license , increased deliveries and collections from the shops by Large Lorries , illegal parking and parking across residential drive ways is causing further congestion.

The Imberhorne residential estate is the home of 2 primary schools and a secondary school. Everyone wants to maintain a safe environment for pedestrians but especially school children walking too and from school. With the increased vehicle traffic this will increase the risk to these children.

There rightly has been a focus on the Imberhorne rd junction with London Rd and the Felbridge traffic lights but there has hardly been a murmur on the effects of building 1000 houses on the doorstep to the Imberhorne estate.

Before any further permission is given for the go ahead of any building, please could road markings be reintroduced on the roads, illegally parked vehicles being ticketed and removed and increase the number of safe pedestrian crossing points (zebra/pelican crossings).

All I want is Infrastructure first before any new development and Accountability of officials when ill judged decisions are made.

Regards,

Barry Allen.

Sent from my iPhone

2489

Site Allocations DPD: Main Modifications Response

Main Modification: MM2

ID: 24890

Response Ref: 2489/1/MM2

Respondent: Sally and Jack Harper Stunell

Organisation:

On Behalf Of:

[REDACTED]

From: Sally Harper [REDACTED]
Sent: 07 December 2021 11:45
To: Idfconsultation
Subject: Land South of Crawley Down Road
Attachments: Site_Allocations_DPD_Regulation_19_Response_Ascotts.docx

Follow Up Flag: Follow up
Flag Status: Completed

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Hello, please find attached our reasons for objecting to the building of 200 houses on the land south of Crawley Down Road in Felbridge.

Regards,

Sally Harper

RESPONSE TO SUBMISSION SITES ALLOCATIONS DPD REGULATION 19

This document has four parts: Part A – Personal Details
Part B – Representation
Part C – Expanded Arguments to Support Representation
Part D – Actions I am seeking

PART A – PERSONAL DETAILS

Name	<input type="text" value="Sally Harper"/>
Address	<input type="text" value="REDACTED"/>
Email	<input type="text" value="REDACTED"/>

PART B – REPRESENTATION

My comments relate to the lack of legal compliance and the unsoundness of the:

Site Allocations DPD	<input checked="" type="checkbox"/>
Sustainability Appraisal	<input checked="" type="checkbox"/>

I consider the site Allocations DPD to be unsound in the following respects:

Positively Prepared?	<input type="checkbox" value="No"/>	Failure to positively engage with landowners/developers offering large strategic sites such as Crabbet Park
Justified?	<input type="checkbox" value="No"/>	Failure to properly take account of reasonable alternatives, and failure to show sites SA19 & SA20 to be sustainable or deliverable
Effective?	<input type="checkbox" value="No"/>	Failure to demonstrate strategic highway matters to be deliverable to resolve severe traffic constraints in East Grinstead
Consistent with National Policy?	<input type="checkbox" value="No"/>	Sites SA19 & SA20 are not sustainable in accordance with policies in the framework

Please note that due to the lack of effective publicity by MSDC, I was totally unaware of the Regulation 18 consultation so was unable to comment on the Site Allocations DPD Draft Plan, despite wanting to do so. I have only become aware of this consultation from the Infrastructure First group's activities.

I support the arguments made by the Infrastructure First Group and would like them to represent me at the Examination.

Yes

No

I am OBJECTING to the Site Allocations DPD and Sustainability Appraisal, and in particular to following proposed allocations being included in the Site Allocations DPD ...

SA19 – Land South of Crawley Down Road

SA20 – Land South and West of Imberhorne Upper School

I consider them to be unsustainable and in conflict with National Planning Policy and the Local Development Plan [Mid Sussex District Plan & East Grinstead Neighbourhood Plan] for the following reasons:

1) The Council has failed to consult properly with the wider public

2) The Council has failed to adequately assess all potential sites

Allocation of sites SA19 & SA20 would ...

3) Lead to reduced opportunities for people to live and work within their communities

4) Lead to unsustainable traffic congestion with local junctions already over capacity

5) Be contrary to national planning policies & the Local Development Plan

6) Not offer any new local amenities like shops

Allocation of site SA19 would ...

7) Represent an unacceptable extension to Felbridge village and result in coalescence with East Grinstead

Allocation of site SA20 would ...

8) Result in loss of valued agricultural land and habitat, harm the setting of heritage assets and result in coalescence with the village of Felbridge

1. The Council has failed to consult properly with the wider public

Unsound because ...

MSDC has failed to deliver on its Statement of Community Involvement strategy

- ❖ The National Planning Policy Framework [NPPF] requires councils to carry out public consultation on plans that is transparent and front-loaded (ie. at the earliest opportunity). Paragraph 16 says that *“Plans should be shaped by early, proportionate and effective engagement between plan makers and communities, local organisations, businesses, infrastructure providers and operators and statutory consultees...”*
- ❖ MSDC’s Statement of Community Involvement requires that *“the community should be involved as early as possible in the decision making process when there is more potential to make a difference”* and that *“community involvement should be accessible to all those who wish to take part”*.
- ❖ MSDC claim to have met their obligation to consult with residents by; Issuing a single press release; Email alerts (to the few people with prior knowledge of the consultation and so had registered their email address); ad-hoc comments on the Council’s social media channels; posts on the Council’s website; and exhibition boards in the public library (for a few days during the Regulation 18 consultation period and nothing at all for the Regulation 19 consultation).
- ❖ The evidence shows that these communication channels have been wholly inadequate in reaching residents and hard-to-reach groups.
- ❖ **Ineffective Press Release Campaign ...** MSDC state that the press release was distributed to the following:
 - **TV outlets** – ITV Meridian News & BBC South East Today
 - **Radio Stations** – BBC Radio Sussex; BBC Radio Surrey; Burgess Hill Community Radio; Heart Radio; Meridian FM & More Radio
 - **Newspapers** – East Grinstead Courier; Mid Sussex Times; The Argus & West Sussex County Times
 - **New Agencies** – Dehaviland; Dods Monitoring & Press Association
 - **Magazines** – Cuckfield Life; East Grinstead Living; Hurst Life; Lindfield Life; RH Uncovered & Sussex Living
 - **Websites** – BBC News Online; Burgess Hill Uncovered & Crawley News 24
- ❖ However MSDC have failed to monitor whether the press release was used by these media outlets.
 - Officers can only say that they *“were aware that the Mid Sussex Times ran a story on 30th July regarding the consultation.”* Just one entry in a weekly paper servicing the towns of Burgess Hill and Haywards Heath but that is not distributed in East Grinstead or Felbridge. No publicity in the local East Grinstead paper despite the DPD proposing over half of the homes to be allocated in East Grinstead and Felbridge.

❖ **No alerts on the Council's website ...**

- Neither the main landing page nor the main 'Planning and Building' page make ANY reference to the consultation.
- The Council's dedicated 'Consultations' page advertises only a 'Public Spaces Protection Order – Dog Control Consultation', and says NOTHING about the Site Allocations consultation.

❖ **No alerts in Mid Sussex Matters ...**

- MSDC's own magazine is distributed at taxpayers' expense 3 times a year to 73,000 households in Burgess Hill, East Grinstead, Haywards Heath and Mid Sussex villages.
- MSDC say that *"Wherever possible, details of forthcoming consultations are included within the magazine, this is our preference as it reaches every household in the district. However publication dates and consultation dates do not always coincide."*
- The Spring 2020 edition failed to mention the Site Allocations consultation but did alert readers to the review of the local plan not due to start until 2021.

2. The Council has failed to adequately assess all potential sites

Unsound because ...

- Alternative sustainable sites that would better meet Crawley's unmet need were summarily discarded without due consideration
- So-called 'High Performing Sites' were not adequately assessed against acknowledged Highway constraints or EGNP policies

- ❖ The purpose of the Site Allocations DPD is to meet the Inspector's requirement for MSDC to allocate sites to help accommodate Crawley's unmet need, which they had failed to take account of in their submitted District Plan.
- ❖ Deliverable sites nearer to Crawley have been dismissed without proper regard to their overall sustainability and without being assessed against any of the 17 planning considerations imposed on the sites allocated in the DPD.
- ❖ National planning policy (NPPF) says that development plans should be prepared on the basis that all reasonable alternatives are explored. Two significant deliverable and sustainable options were dismissed without due consideration.
- ❖ The site put forward at Crabbett Park (SHEELA Reference 18) could provide up to 2,300 homes close to the Crawley and could be linked into the Fastway public transport system. This would allow future residents ready access to Crawley's extensive services, infrastructure and employment opportunities using sustainable transport.

- ❖ Developers Mayfield have put forward a proposal for a new, sustainable, mixed-use, garden village south of Crawley (Mayfields Market Town) in which the developer has undertaken to provide a comprehensive range infrastructure services before the site is occupied. Whilst Horsham DC have engaged positively with Mayfield, MSDC have failed to do so.
- ❖ MSDC say that all sites in the DPD must be 'contiguous with an existing settlement' as set out in policy DP6. This policy was not designed to take account of housing shortfalls in neighbouring authorities and is insufficiently flexible. NPPF paragraph 81 says that "*planning policies should be flexible enough to accommodate needs not anticipated in the plan*".
- ❖ MSDC officers confirm that the site at Crabbett Park was rejected solely due to its lack of 'Connectivity with existing settlements'. They say that ... "*The criteria established to assess the degree of separation is based on a distance of 150m from the built up area boundary (as defined on the Policies Maps)*".
- ❖ This is an error in fact - the site at Crabbett Park is less than 100m from the built-up boundary of Crawley, meaning that the selection process was unsound and the site rejected on spurious grounds.
- ❖ The sites in East Grinstead & Felbridge were evaluated as 'high performing sites' without any evidence being presented to show that the assessment took account of the widely reported traffic constraints or relevant neighbourhood plan policies.
 - The site assessment section on 'highways', arguably the most relevant to the sites along the A264/A22 corridor, was left blank.
 - No evidence is offered to show that policies EG2, EG2a or EG11 were genuinely considered or that they played any role in the overall assessment of sites.

3. Allocation of sites SA19 & SA20 would lead to reduced opportunities for people to live and work within their communities

Unsound because ...

- Unsustainable separation of homes and employment space

- ❖ There is no housing shortfall in East Grinstead or Felbridge where the housing need is fully satisfied by the 782 homes already completed since the start of the plan period together with the 1,238 homes already committed ...
 - 714 with permission as at April 2014
 - 270 allocated in the Neighbourhood Plan
 - 254 permitted since April 2020

[Source: MSDC Housing Land Supply 'Completions and Commitments' 2020]
- ❖ The proposed sites are required to meet a housing shortfall in Crawley for about 1,500 new homes. Nearly half of these are proposed for two sites in East Grinstead and Felbridge. Alternative and more sustainable development sites on the edge of Crawley have been dismissed without proper consideration.

- ❖ The proposed site allocations at East Grinstead and Felbridge run counter to District Plan strategic objectives to support sustainable economic growth. A stated aim of Policy DP1 is *“to provide opportunities for people to live and work in their communities, reducing the need for commuting”*.
- ❖ The DPD proposes 9 new employment sites elsewhere in the district but none in East Grinstead or Felbridge.
- ❖ Felbridge is a medium sized village with very limited employment opportunities and East Grinstead has suffered a very significant loss of employment space since the beginning of the plan period.
- ❖ A key finding of the Mid Sussex Economic Profile Study (2018), says that *“There has been a significant loss of floor space to residential conversions particularly in East Grinstead.”* This study reports 19,440m² of commercial office space in East Grinstead.
- ❖ Since then East Grinstead’s stock of office space has continued to decline, with 12,000m² (62%) being lost as a result of a single planning permission for the conversion of East Grinstead House in June 2020.
 - The East Grinstead Business Association objected to the conversion, saying that we have lost *“7 existing, long standing, large and well known successful local businesses that have live leases and in combination employ around 1,000 people”*
 - The conversion will yield another 253 homes, with potentially double the number of new residents needing to commute out of East Grinstead for work
 - Large sites do not contribute towards the MSDC windfall targets but unplanned homes on this scale should count towards the number of homes the Site Allocations DPD is required to provide
- ❖ MSDC confirm that they do not monitor the amount of office floorspace lost through residential conversions, so have no evidence to show that the 772 homes proposed for East Grinstead and Felbridge are sustainable. Potentially, there could be 1,500 new residents and no new employment space.
- ❖ Increasing traffic congestion and loss of employment space act as significant constraints on economic growth and investment. Another stated aim of Policy DP1 is *“to promote a place which is attractive to a full range of businesses, and where local enterprise thrives”*.

4. Allocation of sites SA19 & SA20 would lead to unsustainable traffic congestion with local junctions already over capacity

Unsound because ...

- Material up-to-date traffic evidence is being withheld from the consultation process
- The MSDC strategic transport assessment understates baseline traffic conditions
- Despite this, the model highlights a severe cumulative impact in-combination with allocations in the adopted plan
- There are no demonstrable highway mitigation proposals

- ❖ Multiple traffic studies confirm that the local highways network is a significant constraint to development in East Grinstead and threatens its future economic sustainability. The East Grinstead Neighbourhood Plan states that *“The constrained nature of East Grinstead’s current infrastructure is by far the greatest challenge facing the town in the immediate future, with existing roads and junctions already over capacity.”*

- ❖ MSDC has published a revised transport study by SYSTRA as evidence to support the Site Allocations DPD. They have also jointly commissioned WSP to carry out a study into Felbridge A264/22 junction capacity and to look in detail at options to alleviate congestion.

WSP Study

- ❖ An Executive Summary Report dated October 2019 was published by Tandridge District Council but this report has NOT been disclosed by MSDC. It is understood that MSDC is refusing permission to release the full report for consultation.
- ❖ The WSP Executive Summary concludes that the A264/A22 junction in Felbridge is currently operating over capacity ...
 - *“The Felbridge junction has been identified as a constraint to development coming forward in Tandridge and the Felbridge/East Grinstead area. The junction currently operates above capacity leading to congestion during peak periods and at other times of the day.”*
 - The congestion figures for the A264 approach arm were measured in 2018 ...

	AM Peak	PM Peak
Junction Capacity *	106.60%	101.40%
Vehicle Queue Length	48	33
Queuing Delay	3 mins 2 secs	1 min 55 secs

* 100% is deemed to be a junction’s theoretical capacity

- ❖ The WSP Executive Summary confirms that their recommended option requires the compulsory purchase of 3rd party land and while it offers a temporary improvement over the ‘do nothing’ option, it was unable to prevent the junction becoming over capacity once again by the end of the plan period.

SYSTRA Report

- ❖ The MSDC strategic transport study predicts that most major junctions in East Grinstead and surrounding area will be over-capacity by the end of the plan period BEFORE considering the additional impact of the proposed allocations.
- ❖ The SYSTRA model predicts that the 772 houses being proposed for East Grinstead and Felbridge will significantly increase the current levels of ‘rat running’ along residential streets and country lanes.
- ❖ The SYSTRA model attributes the severe capacity issues to houses already allocated by the 2018 District Plan and argues that the impact of the proposed DPD allocations taken separately is not sufficient to trigger the National Policy ‘residual cumulative impact’ test ...
 - NPPF paragraph 109 states that *“Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.”*
 - The impact of traffic from sites proposed in the Site Allocations DPD is not separate from the traffic impact from sites allocated in the Local Development Plan. The Sites Allocation DPD is allocating sites within the District Plan as instructed by the inspector, in order to rectify MSDC’s earlier failure to take account of Crawley’s unmet need in its submitted draft District Plan.
 - MSDC argue that traffic generated by the Local Development Plan is an ‘existing situation’ and can be ignored when applying the ‘residual cumulative’ test. This is untenable.

- ❖ The SYSTRA model relies on adjusted traffic data from 2008. This significantly understates the existing levels of congestion at the A264/A22 junction in Felbridge when compared with the WSP model using data collected in 2018.

	SYSTRA Model		WSP Model	
	AM Peak	PM Peak	AM Peak	PM Peak
Junction Capacity	61%	65%	106.60%	101.40%
Vehicle Queue	2	3	48	33
Queuing Delay	15 secs	21 secs	3 mins 2 secs	1 min 55 secs

- ❖ MSDC have chosen not to publish the findings of the more recent WSP traffic study and are therefore considered to be withholding material evidence from the consultation process, preventing residents being informed of the expected consequences of development.

No Deliverable Mitigation

- ❖ To mitigate the impact of the proposed allocations in East Grinstead, MSDC makes vague references to an 'A264/A22 corridor improvement project' and a project to deliver unspecified 'Bus priority along the A22'. There are no deliverable or specific proposals in the Infrastructure Delivery Plan and no secure funding.
- ❖ WSP were jointly commissioned to investigate improvement options on the A264/A22 in 2018 but MSDC have chosen not published the findings. The WSP Executive Summary calls into question the deliverability of the sites at East Grinstead and Felbridge.
- ❖ There are no proposals for highway interventions in the Site Allocation DPD or Sustainability Appraisal to mitigate the impact of the proposed sites in East Grinstead and Felbridge, either alone or in combination with sites already committed in the Local Development Plan.
- ❖ This Site Allocation DPD is therefore contrary to national policy ... NPPF paragraph 108 states that "*In assessing sites that may be allocated for development in plans, or specific applications for development, it should be ensured that: any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree.*"

5. Allocation of sites SA19 & SA20 would be contrary to the NPPF and the Local Development Plan

Unsound because ...

- Sites SA19 and SA20 are in conflict with Neighbourhood and District Plan policies
- Proposed site allocations at Felbridge and Imberhome Farm are outside the East Grinstead/Felbridge built-up boundaries and are therefore against policies EG2, EG2a, DP12 and DP13
- In the absence of demonstrable proposals to resolve the local junction capacity issues, the site allocations in East Grinstead and Felbridge are in conflict with policies EG11 and DP21

- ❖ At a review of Neighbourhood Plan policies on 3rd May 2018 following the adoption of the District Plan, MSDC confirmed that apart from policy EG5, the Neighbourhood Plan was in conformity.
- ❖ Policies EG2 and EG2a are designed to resist development outside the built-up boundary and "to ensure that development does not result in the gradual accretion of development at the urban fringe". These policies conform to MSDC's own policies DP12 and DP13, which say ... "*The primary objective of the District Plan with respect to the countryside is to secure its protection by minimising the amount of land taken for development and preventing development that does not need to be there.*"

- ❖ It is not clear why MSDC believe the houses to meet the housing shortfall in Crawley are best located in the countryside in the gap between the Felbridge and East Grinstead, outside their urban boundaries when sustainable sites adjacent to Crawley have not been properly evaluated.
- ❖ The proposed site allocations SA19 and SA20 are outside the East Grinstead & Felbridge built-up boundaries and are therefore against both Neighbourhood and District Plan policies [EG2, EG2a, DP12 & DP13].
- ❖ The supporting text to policy EG2 (at paragraph 4.9) explicitly calls for development to be refused in the areas of countryside at Imberhorne Farm and south of the Crawley Down Road ... precisely the location of the proposed sites SA19 and SA20.
- ❖ Policy EG11 was designed to ensure that East Grinstead didn't have to accept housing allocations like these without compensating improvements to the local highways network being delivered ... *"Proposals, which cause a severe cumulative impact in terms of road safety and increased congestion, which cannot be ameliorated through appropriate mitigation will be refused"*.
- ❖ Policy EG11 fully supports policy DP21 which requires that ... *"development is accompanied by the necessary infrastructure in the right place at the right time that supports development and sustainable communities. This includes the provision of efficient and sustainable transport networks"*.

6. Allocation of SA19 would represent an unacceptable extension to Felbridge village and result in coalescence with East Grinstead

Unsound because ...

- SA19 is contrary to the spatial housing objectives of policy DP6
- SA19 is contrary to Neighbourhood Plan policies EG2 and EG2a and corresponding District Plan policies DP12 and DP13

- ❖ Felbridge is a rural village in Surrey with a small strip of land south of the Crawley Down Road falling within the administrative boundary Mid-Sussex.
- ❖ TDC acknowledge in its Settlement Hierarchy Addendum 2018 that *"although the proximity of East Grinstead plays a role in Felbridge's sustainability, the settlement itself can only demonstrate a basic level of provision and as such is categorised as a Tier 3 (rural settlement)"*
- ❖ However, MSDC is treating the land south of the Crawley Down Road as an extension to East Grinstead without due regard for its village status or the gap between the two distinct communities.
- ❖ With no more frontage sites available along the Crawley Down Road, MSDC are allowing the extension of the village towards East Grinstead, with 120 homes recently approved as back land developments. With a current population of 532 homes, the existing commitments will increase the number of homes by nearly 25%. The village has no doctor's surgery, pharmacy, dentist, opticians and only a small convenience store. Infrastructure contributions and subsequent council taxes will go to centrally to MSDC in Haywards Heath with no plans to improve meagre services in the village.
- ❖ The proposal to allocate SA19 as an additional back land site for 200 homes south of the Crawley Down Road would result in an increase in the number of homes by a further 30%; without any plans or funding to improve infrastructure that would mitigate the harm to the function and character of the village.

- This is contrary to policy DP6 (Settlement Hierarchy) which allocates a much smaller proportion of housing requirement to Tier 3 medium sized villages.
- The strategic aims of policy DP6 are ...*“To promote well located and designed development that reflects the District’s distinctive towns and villages, retains their separate identity and character and prevents coalescence”*, and *“To create and maintain town and village centres that are vibrant, attractive and successful and that meet the needs of the community”*.
- ❖ The proposed site is located outside the built-up boundaries of both Felbridge and East Grinstead. This is contrary to policy DP12 (Protection and enhancement of countryside) which says that ...*“The primary objective of the District Plan with respect to the countryside is to secure its protection by minimising the amount of land taken for development and preventing development that does not need to be there”*.
- ❖ The site allocation is also contrary to the strategic aim of policy DP13 (Preventing Coalescence) ...*“To promote well located and designed development that reflects the District’s distinctive towns and villages, retains their separate identity and character and prevents coalescence.”*
- ❖ The East Grinstead Neighbourhood Plan expressly lists the land to the south of Crawley Down Road as contrary to policies EG2 and EG2A to ensure development “does not result in the merging or coalescence of settlements and the gradual accretion of development at the urban fringe”.

7. Allocation of SA19 would result in loss of valued agricultural land and habitat, harm the setting of heritage assets and result in coalescence with the village of Felbridge

Unsound because ...

- SA19 landscape assessment not supported with evidence
- SA19 contrary to DP34 and NPPF paragraph 175

- ❖ Site allocations SA20 is surrounded by high yielding agricultural land that justifies an Agricultural Land Classification Grade of 3a (ie. the best and most versatile agricultural land).
 - District Plan DP12 says that *“Where identified, Grade 1, 2 and 3a agricultural land should be protected from development due to its economic importance and geological value. This is the land which is most flexible, productive and efficient and can best deliver future crops for food and non-food uses.”*
 - The Sustainability Appraisal reports that the Council currently lacks data to distinguish Grade 3 from 3a agricultural land and assumes a default classification of 3 without evidence.
 - The planning assessment proforma rates the SA20 site location as having a ‘positive impact’ on the Landscape without any explanation or evidence to support the officers’ opinion.
- ❖ Site allocation SA20 is adjacent to the Grade II Listed Gullede Farmhouse and Imberhome Farm Cottages
 - The rural setting of these listed buildings is important to their value as heritage assets and development on the site would overwhelm the buildings and result in significant harm
 - District Plan policy DP34 says that *“Special regard is given to protecting the setting of a listed building”*

- ❖ The proposed site also lies adjacent to a substantial area of ancient woodland which is already 'hemmed in' on two sides by residential and industrial development. Further development would serve to isolate the woodland from the surrounding countryside resulting in unnecessary habitat fragmentation ...
 - Ancient woodland is classified by National Planning Policy as an 'unreplaceable habitat' and NPPF paragraph 175 says *"development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons"*
 - Natural England states that *"Ancient woodland and the wildlife it supports are particularly vulnerable to various impacts associated with nearby residential areas. These include recreational disturbance, fly tipping, light pollution, introduction of non-native plant species from garden waste, predation of wildlife by pet cats and pollution from dog faeces"*
 - These harmful impacts can only be mitigated to a limited degree by the imposition of a buffer zone.
- ❖ The farmlands at the proposed SA20 site location provide an important breeding habitat for 'red list' bird species such as the Skylark and Yellowhammer with loss of habitat being the main reason for the sharp population decline.
 - The developer's own Ecological Survey acknowledges that the Skylark *"requires more specialised ground nesting provisions"* and that the ability of the SANGS to compensate for the loss of farmland habitat is limited due to recreational disturbance.
 - NPPF paragraph 175 says that *"if significant harm to biodiversity resulting from a development cannot be avoided, adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused."*

PART D – ACTIONS I AM SEEKING

I request that the following action is taken with respect to the draft Site Allocations DPD and associated documents:

1. The DPD should be withdrawn as it is not legally compliant - the consultation was not carried out in line with national policy or the MSDC Statement of Community Involvement.
2. The WSP transport report should be published in full and its findings submitted for consultation.
3. The proposed allocations at East Grinstead and Felbridge should be withdrawn as they cannot be delivered sustainably.
4. MSDC should withdraw the DPD and carry out a proper evaluation of sustainable sites close to Crawley including Crabbet Park and Mayfield.
5. In the event that the Inspector decides the DPD should progress to Examination then any allocations at East Grinstead or Felbridge should be made contingent on delivering the junction improvements identified in Atkins 3 and the WSP studies.
6. I do not wish to take part in the Examination but I support the arguments made by the Infrastructure First Group and would like them to represent me at the Examination.

[REDACTED]

From: Sally Harper [REDACTED]
Sent: 11 January 2022 19:15
To: Policy Consultation
Cc: [REDACTED]

Subject: Developments in Felbridge and Imberhorne

Follow Up Flag: Follow up
Flag Status: Completed

Categories: Laura to move

Some people who received this message don't often get email from [REDACTED] [Learn why this is important](#)

Hello,

I am writing to add my voice to objections around the proposed development sites in Felbridge (200 houses) and Imberhorne Farm (550 houses).

Concerns around traffic and congestion have still not been adequately addressed, nor have those around local primary school places or the lack of infrastructure that would come with these new developments. I know there is a need for more affordable housing in this country but the majority of these new houses do not fall under the 'affordable housing' definition, in fact only 30% are being referred to as 'affordable'.

It is more building on green space that will have a detrimental effect on the character of the area and quality of the environment.

In addition, Felbridge is already short on amenities (we have just one small local shop on Crawley Down Road) and these developments aren't offering anything to current local residents like shops or a cafe. We already have a children's playground which is the only thing mentioned in the Felbridge development.

I very much hope the inspector will listen to local residents and reconsider giving his assent to these developments.

Thank you for reading.

Sally and Jack Harper Stunell

2490

Site Allocations DPD: Main Modifications Response

Main Modification: MM2

ID: 24900
Response Ref: 2490/1/MM2
Respondent: Zoe Fox
Organisation:
On Behalf Of:

From: Zoe Fox [REDACTED]
Sent: 11 January 2022 17:03
To: Policy Consultation
Subject: Housing in Felbridge

Categories: Laura to move

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I do not agree with building new houses on the farmland at Felbridge especially as very little consideration has been given to reducing the impact on the environment. All new housing must be carbon neutral. Why does this generation think it is OK to destroy the existing farmland for future generations without ensuring that the environmental damage is zero.

As a town we are currently turning many old offices into flats. Although this is preferable this is already impacting on traffic flow at peak times especially through the back roads around the housing estates. This environmental damage of extra cars flooding East Grinstead & Felbridge with pollution is bad enough without building even more houses all over our green land. Please stop damaging our world.

Zoe Fox
East Grinstead resident

2491

Site Allocations DPD: Main Modifications Response

Main Modification: MM2

ID: 24910

Response Ref: 2491/1/MM2

Respondent: Jenny Whiteside

Organisation:

On Behalf Of:

From: Jenny Whiteside [REDACTED]
Sent: 11 January 2022 16:39
To: Policy Consultation
Subject: Housing concerns

Categories: SITES DPD MM, Laura to move

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Dear Sirs

We have lived in East Grinstead for 10 years now, and in all that time all we have seen is lots of flats and developments going on. The one near us on West Hill is badly thought out(if there were any) the Turners Hill Road is a B road which is now a bypass. There is no thought for the views of us who live here.

More and more land sucked up by greedy developers who don't build for peoples needs. No more facilities, supermarkets, schools or decent roads or doctors and dentists etc. What sort of Country are we going to be left with? Where's the democracy? It's more lucrative to build bigger houses than say 2 bed ones.... Which are in short supply. Then lend people huge sums of money to buy them as inflation gets higher, rether than increase interest rates.

We are told that the government is trying to improve environmental concerns and animal welfare.... Really? This is not the way to do that. More concrete everywhere. Of course many MP's are property developers and landlords, so how do you contest that in a Country that has no regard for its citizens. This is outrageous.

Very fed up.

Yours sincerely

J Whiteside

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2509

Site Allocations DPD: Main Modifications Response

Main Modification: MM2

ID: 25090

Response Ref: 2509/1/MM2

Respondent: Mo Peters

Organisation:

On Behalf Of:

From: Mo Peters [REDACTED]
Sent: 20 January 2022 10:07
To: Policy Consultation
Subject: Fwd: Imberhorne Farm & Copthorne Road development

You don't often get email from [REDACTED] [Learn why this is important](#)

Sent from Mo's iPad

Begin forwarded message:

From: Mo Peters [REDACTED]
Date: 18 January 2022 at 12:28:38 GMT
To: [REDACTED]
Subject: Imberhorne Farm & Copthorne Road development

Dear Sirs/Madams,

You probably won't even read this, but I am going to try anyway.

I am writing to you for clarification as to why you are allowing the development of these sites. I notice that you all live within the vicinity of the two developments and as such have been privy to the mounting congestion along the Copthorne Road and the A22 making the area gridlocked especially when any road disturbances or panic buying occurs. The council seem to have totally ignored this and quote 2018 for its denial of congestion, which even then was not true. There have been many suggestions to improve traffic conditions but all these have proved undeliverable.

The relocation of Imberhorne lower school will also add more traffic congestion. This doesn't seem to have been taken into account at all.

Do you collectively really believe that the housing developments on Manor View, those on Fen Place farm Crawley down, Copthorne Road and Imberhorne farm are not going to add to the already congested roads in the area. If so you are hiding your heads in the sand. This will also add more deterioration of the already abysmal road surfaces that West Sussex County Council don't seem able to repair with any lasting effect.

Even with the relocation of Imberhorne lower school (which will allow for more building) there will still be a shortage of school places, so where are the children from these developments going to go. Further a field I suspect leading to more congestion and pollution.

Not sure if you have NHS doctors or private if NHS have you tried to get an appointment - fairly long wait in most circumstances?

Where are the people buying these houses going to sign on for NHS? A new doctors surgery won't help as they can't get the doctors.

The same applies for Dentists, the NHS ones are all full.

Public transport is not a great deal better. The buses do run but with long intervals.

Please tell me how you can justify these developments with total disregard for infrastructure?

I have no objections to the building of houses, but why build on land that is used widely used by the public. (Walkers, cyclists, & equestrian etc)? Why not other sites that can sustain the development? Have you looked at the field to the South East of Imberhorne lane by the bridge? This field is not used by the public. We are constantly being told to exercise more but the building on Imberhorne Farm will take away the pleasure of walking in the countryside during and after the completion of the site.

As an aside, the area of land put aside on Imberhorne farm is far bigger than the initial request needs, does this leave room for even more development on the land?

Can you please tell me how the contractors are going to access the farm?

I have heard of a possible road opposite Heathcote drive, this might be ok for the fields to the east of the Public footpath, but how are they going to access the bottom field to the west of the footpath, directly in front of Gulledge? They will have to use the public footpath or cross it, as there is no other way to access the field unless you use the Worth Way. Is this legal?

Why does West Sussex want to merge East Grinstead, Crawley Down, Copthorne, Crawley & Horsham (Kilnwood Vale). It will be like a mini London with no infrastructure.

Maybe you could bring these points to the council and relay their findings to me.

It would be nice to think the council might reverse its decision but I have a feeling my comments will fall on deaf ears, as it seems the only thing the council is interested in is money to the detriment of health and well-being of its constituents.

Yours faithfully

M. Peters

Sent from Mo's iPad

2510

Site Allocations DPD: Main Modifications Response

Main Modification: MM2

ID: 25100
Response Ref: 2510/1/MM2
Respondent: David Peters
Organisation:
On Behalf Of:

[REDACTED]

From: Euan Peters [REDACTED]
Sent: 20 January 2022 12:41
To: Policy Consultation
Subject: Housing development Crawley Down Road/Imberhorne Farm

[You don't often get email from [REDACTED]. Learn why this is important at <http://aka.ms/LearnAboutSenderIdentification>.]

Dear Sir/Madam,

As a concerned resident of the Imberhorne Estate since 2004, I feel compelled to express my concerns over the above, specifically the traffic congestion that will occur in and around the area.

Anyone who lives in and around East Grinstead knows the traffic chaos at peak times and when there is even the slightest obstruction to traffic flow (e.g. temporary traffic lights at the junction between the Copthorne Road/A22 recently where new houses are, ironically, being built).

Even roadworks in Lingfield or Turners Hill affects the traffic in East Grinstead - this is a fact. The converse is true that if/when these houses are built there will be a knock-on effect on the traffic through Turners Hill and Lingfield. My main question is: previous studies have shown that traffic congestion is the main reason for refusing further housing development in East Grinstead, the latest bring in 2018 and the situation has deteriorated further since then.

It would appear that all the evidence is being ignored - after all, taking the traffic out of the equation leaves the way clear to build more houses (let alone the lack of infrastructure which is another matter entirely which I will not go into here).

There is a farcical idea apparently that public transport will magically improve and people will stop using their cars. How can this be when buses themselves are caught up in and adding to the traffic chaos?

East Grinstead is already congested. Adding more housing will increase this. This in turn will lead to more road damage (temporary patching seems to be all the council can manage). Even if public transport is increased it will exacerbate the current situation. This increase in traffic will undoubtedly increase pollution which surely is contrary to the Clean Air Act 1993?

Sporadic temporary roadworks add to the fun - in the past we have had the situation where the A22, A264, Lingfield Road and Turners Hill Road have all had road works at the same time. As I write this there are four sets of long-term roadworks within a two mile radius which are adding to congestion, proving the point.

None of this takes into account the houses already being built on the Crawley Down Road, plus the new development at the junction of Turners Hill Road and Gardenwood. Are these included in the figures for house building in the area? I think not.

It is a crying shame when you walk through Imberhorne Farm and onto the track to think that this will become a housing estate. Especially after the walking saved our sanity during lockdown.

Please could you forward this to the Inspector.

Yours Faithfully,

David Peters

2512

Site Allocations DPD: Main Modifications Response

Main Modification: MM2

ID: 25120
Response Ref: 2512/1/MM2
Respondent: Michele Edwards
Organisation:
On Behalf Of:

[REDACTED]

From: Michele Edwards [REDACTED]
Sent: 20 January 2022 15:39
To: Policy Consultation
Subject: MM2 land south and west of Imberhorne Lane East Grinstead

You don't often get email from [REDACTED] [Learn why this is important](#)

I am very concerned about this proposal. There is not the infrastructure and the roads are at capacity already. There appear to be no plans to improve any of the junctions and indeed I cannot see there is the spare to improve. To use any facilities in East Grinstead residents would be using cars and adding to the congestion greatly. It would be naive to assume that public transport would be used. There is not a primary school near so parents would drop children off at school by car. As we know most parents both work and cannot walk children to school even if walkable. Previous planners promised road improvements but built the houses and nothing happened.

Michele Edwards

2514

Site Allocations DPD: Main Modifications Response

Main Modification: MM2

ID: 25140
Response Ref: 2514/1/MM2
Respondent: Tim Weller
Organisation:
On Behalf Of:

[REDACTED]

From: [REDACTED]
Sent: 21 January 2022 10:16
To: Policy Consultation; planninginfo; planninghighways@westsussex.gov.uk
Cc: [REDACTED]
Subject: Modifications, Objections for extra housing In Felbridge area

You don't often get email from [REDACTED] [Learn why this is important](#)

I am writing to make my objections to the proposed housing particularly on the land south of Crawley down road and the land south and west of Imberhorne upper school Imberhorne lane East Grinstead.

I have concerns about the Development crossing an actively used bridle way, there are many horse riders around Felbridge that use this as one of vary few options to hack out and exercise their horses putting a road crossing is not helping the safety of this bridal way. **Choosing to put that many houses the other side of the crossing seems a senseless idea driven by profit and not the safety of the bridal way users.**

As a resident on the east end of Crawley down road I see first hand the volumes of traffic that the Felbridge and Crawley down road junction deal with. I believe nobody in our area believes that the traffic survey carried out is an accurate representation of what we experience every day.

I have big concerns about the high levels of traffic in our area – **I believe more independent traffic surveys on all surrounding routes (not funded by developers) need to be done once covid restrictions have been eased and road usage is returned to normal and Also including the effects of the current developments yet to finish.** The information given to us about the current surveys does not line up with a previous study “undertaken in 2018 and although only the executive summary has been public, it clearly shows that the junction was operating at 106% capacity with an average of 48 cars queuing at peak times” and also some comments from a inspector on a previous planning application: “From the local perspective the traffic queuing eastbound on Copthorne Road towards the traffic lights builds up at peak times and frequently reaches as far back as Rowplatt Lane, about 1 km from the junction, and sometimes even further. This was observed during the site visit about 5.30 pm on 15 May and is corroborated by a video camera survey undertaken by the Council over the three-day period 17-19 July 2018” It is also clear the most recent information collected to support this planning application does not line up with the views of the residents of Felbridge.

I believe that the road network is not fit for more housing and needs to be a Major road improvement scheme before any more housing developments are built in and around East Grinstead.

Speaking for my self, the effect the already overloaded roads has on my day to day life:

- I tend to avoid going into East Grinstead Town as this often results in a very slow journey back and fourth
- I see how 'Fragile' the road road network/junctions in Felbridge is – it only takes for one example: a broken down car or lorry (yes I've seen plenty) to trigger huge traffic jams going back to the furnace wood lay and in other areas after the 'Rat runs' reach capacity.
- Traffic using Rowplatt lane to Crawley down road to cut ahead of the slow moving east bound traffic on Copthorne Road, at school drop of times when people are using the cut through this results in drivers driving aggressively, mounting pavements, accelerating hard, honking horns, shouting and swearing at other drivers while trying to get past a primary school with children and parents trying to drop off – its only a matter of time before a terrible accident happens I'm sure.
- Another point on the 'fragile' road network in Felbridge. When there are road works on anywhere in the surrounding area (it seems) which is often, the stress from traffic can increase a lot, during these periods

when visiting local businesses in Felbridge many of them have had very poor days of business as people avoid the area – just like I do. I often my self just ordering things on say amazon rather than nipping out to a local store as it takes far to long to get there and back.

I Also have concerns about the impact on the environment, the are has just lost a lot of open land to a development south of Crawley Down road and the fields to the left and right of the gulledge bridal way are full of wild life. **I support the need for a full environmental impact assessment for the adverse impacts of the proposed 200 home development on crawley down road and other surrounding developments.**

I feel so frustrated with having to write this, to me and everybody I speak to its clear that our areas infrastructure is struggling to keep up with schooling places, doctors appointments, road improvements I could To hear that these houses are meant to be for Crawley I can only help but feel that they are insistent on building in this area to boost profits due to the prices the houses sell for in this area – they are even further from affordable in this area. So why do these developments keep coming?

Local Residents Raised over £25,000 donating their own money to fight this planning application and so far it seems that this has had zero impact on proceedings – it's a total injustice to the people that councils are meant to be serving.

Thanks for reading! I've heard you have received a lot of objections.

Tim Weller

[REDACTED]

2515

Site Allocations DPD: Main Modifications Response

Main Modification: MM2

ID: 25150
Response Ref: 2515/1/MM2
Respondent: Chris hayden
Organisation:
On Behalf Of:

[REDACTED]

From: chris hayden [REDACTED]
Sent: 24 January 2022 09:44
To: Policy Consultation
Subject: DPD Main Modifications Consultation".

[You don't often get email from [REDACTED] Learn why this is important at <http://aka.ms/LearnAboutSenderIdentification.>]

Dear Sirs

I am a resident of Felbridge and would like to express my dismay that you are considering increasing the local population by building more houses but have no plans to ease the current horrendous traffic conditions.

This in my opinion shows a lack of understanding of the traffic situation and congestion at peak traffic hours.

The congestion from the traffic lights is backing up in cophthorne rd adding 10 minutes to any journey on a normal day and even longer on the very busy days.

I strongly object to any further increase of the local car numbers without any thought to the current situation.

You simply can not grant permission for developers to build houses for profit and leave us with more pollution and congestion.

As I live here and will be affected by your decision I ask you to take my families health and travel conditions seriously.

Regards

Chris hayden

[REDACTED]

Sent from my iPhone

2520

Site Allocations DPD: Main Modifications Response

Main Modification: MM2

ID: 25200
Response Ref: 2520/1/MM2
Respondent: Julie Nottingham
Organisation:
On Behalf Of:

[REDACTED]

From: Julie Nottingham [REDACTED]
Sent: 21 January 2022 18:51
To: Policy Consultation
Subject: Objection to proposed development at Imberhorne Farm and Felbridge

[You don't often get email from [REDACTED] Learn why this is important at <http://aka.ms/LearnAboutSenderIdentification.>]

Dear Sirs

As a Felbridge resident, I strongly object to the proposed massive development at Felbridge and Imberhorne Farm, due to the traffic misery this will cause to the already gridlocked Felbridge and Imberhorne junctions, and the negative impact this will have on our lives.

I have lived in Felbridge since July 1986 and over the subsequent 35 years have seen the traffic in the area get worse and worse. I have to get through the junction by The Star to get to my home, and some days this is just utter misery. Felbridge is a renowned traffic black spot. The slightest hold-up or repair being carried out on the A22 causes the traffic approaching the junction to queue back along the A264 as far as the Doves Barn nursery.

Crawley Down road backs up terribly as drivers use it to try and get ahead of the A264 queue, and at school times the road is impassable. With the primary school there, this is not safe for the children and village residents alike. A child was knocked down outside the school when my children were there in the early 1990's, when the traffic was so much lighter. There's another accident just waiting to happen.

To avoid all this many drivers go round Turners Hill, causing extra congestion there, and Imberhorne lane gets used as a cut through. The traffic into East Grinstead is always very heavy and often queuing back to Felbridge, so again Imberhorne Lane is used as a rat-run through the Imberhorne Estate to get to town. The volume of traffic, plus commercial vehicles (2 industrial estates on Imberhorne Lane plus the council waste and recycling tip further up) along with the speed limit often being exceeded, is not safe for residents or drivers alike.

This traffic congestion is already having a negative impact on all local residents' lives. Personally speaking, the traffic congestion here affects me physically (aggravates my back problem sitting in traffic queues) and mentally due to the stress and misery. And financially....I run a business teaching fitness classes from the Felbridge Village hall, and the bad traffic has often impacted on my business in the past when clients have had to turn around because they couldn't get through the traffic to get to the hall, or didn't attempt the journey in the first place. This proposed development will only make matters worse. And I am not alone, everyone else I speak to here feels the same. One close friend in an adjoining road was so fed up with the traffic congestion here that she moved out of the area completely last month.

All this congestion is only going to get considerably worse once the 1,420 houses already in the pipeline are built, without taking into consideration the above proposal!

Surely the Council should commission urgent safety reviews of traffic congestion at both the Felbridge and Imberhorne junctions, which would be further impacted by this proposed massive development. And for these reviews to be true and accurate, they need to be carried out at peak times and school times.

The Council should make unacceptable traffic congestion and road safety top priorities, and are the main constrain to large scale housing in Felbridge and East Grinstead.

Regards,
Julie Nottingham
[REDACTED]

Sent from my iPad

2521

Site Allocations DPD: Main Modifications Response

Main Modification: MM2

ID: 25210

Response Ref: 2521/1/MM2

Respondent: Judy and Norman Woodward

Organisation:

On Behalf Of:

[REDACTED]

From: norman woodward [REDACTED]
Sent: 22 January 2022 12:42
To: Policy Consultation
Subject: Housing proposals in East Grinstead and Felbridge

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From: [REDACTED]

Dear Sir,

Having just read the Infrastructure First report. I am appalled that neither Highways or the Inspector, whoever he is, have not objected profusely to the volume of houses going to be erected on the Imberhorne Farm area, leading consequently to yet more traffic on the already overcrowded roads in and around Felbridge. Fifty years ago when I worked in Crawley the time spent queuing from Mill Lane to the A22 was around twenty minutes and although traffic has increased considerably, nothing has been done to ease the situation on this road and now the locals are expected to cope with yet more traffic pouring out onto this already congested area. Traffic congestion is now so bad in Felbridge that commuters coming from Crawley divert along Rowplatt Lane and onto the Crawley Down road in the hopes of saving a few minutes. Likewise when you do reach the A22 at London Road frustration mounts on seeing the volume of traffic into East Grinstead the temptation is to turn right at the Imberhorne Lane traffic lights and cut through Heathcote Drive to avoid another queue up to East Grinstead Town centre. How can a development of this size not impact on an already overcrowded road system. I wonder if the people making the decisions live in or even know the area in question, I fear not because if they did they would most certainly be objecting to the road chaos that the proposed huge development will create. Please give very considerable thought to the above because the consequences will make life intolerable for local people if the plans go ahead.

Yours faithfully,
Judy and Norman Woodward

2522

Site Allocations DPD: Main Modifications Response

Main Modification: MM2

ID: 25220

Response Ref: 2522/1/MM2

Respondent: James McClusky

Organisation:

On Behalf Of:

[REDACTED]

From: James McClusky [REDACTED]
Sent: 23 January 2022 13:34
To: Policy Consultation
Subject: proposed housing developement at imberhorne farm

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I am writing to register my complaint about the proposed housing development at imberhorne farm. I am particularly concerned about the impact to the already frankly less than fit for purpose local roads, never mind the destruction of yet another green area, though I doubt that is of much concern to you.

I simply ask that you take the wishes of a great many local residents into account and take some time to reconsider

All the best.

James Richard McClusky

2523

Site Allocations DPD: Main Modifications Response

Main Modification: MM2

ID: 25230

Response Ref: 2523/1/MM2

Respondent: Gill Hancock

Organisation:

On Behalf Of:

[REDACTED]

From: Gill Hancock [REDACTED]
Sent: 23 January 2022 16:08
To: Policy Consultation
Subject: Development West of East Grinstead

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Dear Sir

It is with great dismay that I heard of the proposed 550 houses to be built on farm land west of East Grinstead

There are many concerns;

1. Road congestion. The A22 is overloaded and already inadequate for current traffic.
2. We need farms... the life blood of the country. And we need green spaces for the health of the environment.
3. Schools are under pressure as are medical facilities.

Quality of life for all those in the vicinity of the houses and the roads etc will be severely compromised, not only during the building operations, but for life.

Yours sincerely

Gill Hancock

[REDACTED]

2527

Site Allocations DPD: Main Modifications Response

Main Modification: MM2

ID: 25270
Response Ref: 2527/1/MM2
Respondent: Will Lightburn
Organisation:
On Behalf Of:

From: Will Datsun [REDACTED]
Sent: 24 January 2022 21:44
To: Policy Consultation
Subject: Main Modifications to DPD site Allocation. SA20
Attachments: CNF23.jpg; CNF32.jpg; CNF13bw.jpg; gulleger.jpg; 25-1898.png

Follow Up Flag: Follow up
Flag Status: Completed

[You don't often get email from [REDACTED] Learn why this is important at <http://aka.ms/LearnAboutSenderIdentification.>]

MM22

Dear Mr Fox

We met briefly when you looked at Imberhorne Farm a few months ago but we did not get a chance to chat or for me to show you around Gullege, something I would love to do should you find yourself down this way soon. Photos of Gullege enclosed. There is a lot of local interest in Gullege, the Felbridge Historical Society have done extensive research and writing about it over the years and I often show people around the house and garden.

<https://eur02.safelinks.protection.outlook.com/?url=http%3A%2F%2Fwww.felbridge.org.uk%2Findex.php%2Fpublications%2Fhistory-gullege%2F&data=04%7C01%7Cpolicyconsultation%40midsussex.gov.uk%7Cfc06bbe8cdd94ca63e6a08d9df82aba9%7C248de4f9d13548cca4c8babd7e9e8703%7C0%7C0%7C637786574608940064%7CUnknown%7CTWFpbGZsb3d8eyJWljojMC4wLjAwMDAiLCJQIjoiV2luMzliLCJBTiI6Ikk1haWwiLCJXVCi6Mn0%3D%7C3000&data=pf70gwZW34TOzFEOyrCwsgm68wtThZRP%2FL6ZUPCNq4%3D&reserved=0>

Many famous people from musicians to actors have visited Gullege. Gullege has been used for scenes in films for example a period film 'To Kill a King'

Mum and I live at Gullege, Mum and Dad bought it in 1975 so we have been here 47 years. We lost Dad last year.

There has been no development nearby since the house was built circa 1550. We have not moved from here as we love the place so much, the history, the peace and quiet, surrounded by farmland and nature. The only people who want this development seem to be people with a financial interest in it (Wellbeck Land) and live nowhere near.

The thought of having a huge housing estate right next door horrifies us, I am not exaggerating when I say it keeps us up at night, the thought of there being an army of machines, lorries, bricks, Tarmac descending in the adjacent field haunts us. I am sure the late Mr Emmett would never have wanted such a thing to happen. Nobody wants it, this area is enjoyed by so many just the way it is. I just can't get me head around some billionaire property developer turning up saying I want to build a mega estate on this greenbelt working farm, and Mid Sussex Council (none of whom live up here) seem to be about to grant their every wish and desire. Is it all down to pound signs in the eyes?

As if having thousands of people, cars, motorbikes, with associated mobile phone masts and other urban furniture next door to us suddenly isn't bad enough, its the years and years of it being a building site, the tranquil countryside broken by revving diesel engines, reversing beepers, hammering, vibration, fumes, cranes, dust. Apart from being a filming location we have a recording studio here, trying to record piano and voices or anything acoustic with all that next door would be very difficult not to mention just trying to enjoy peace and quiet in the garden.

I was hoping that when you were presented with this plan of a housing estate going on top of Imberhorne Farm you would have shot it down, countered it with if not a recommendation to reject the whole plan (there are many better places to build houses even if they are needed which according to my research they are not) then a recommendation to scale it down to a more proportionate size of perhaps 20 - 50 dwellings, for the time being at least. A precautionary approach, see how the population goes in the next 10 years, also aren't there over 200,000 empty properties in the UK, 20,000 in London alone?

I am not sure how much power you have in these matters, my cynical self feels like a lot of these consultations and are just window dressing, or akin to a kangaroo court and people with a lot of money can do what they like.. But if you are able to do anything to keep this housing away from Gullege we would naturally very much appreciate it. Even some kind of buffer zone around this unique historic landmark. So far recommendations for amendments to the plan have been astonishingly minimal. We feel you have not taken the true traffic situation, other current construction projects, nature and the general local feeling or other matters into consideration and also that the area marked for housing is within a few feet of Gullege.

I have attached an old map, you can see a quadrangle of barns at Gullege. The North East corner features an OS bench mark carved into the brick in the 1800s. (Shown by symbol on map). The Westmost part of the barns fell down we think in the 1960s. I have been renovating the rest of the barns and have reroofed most of them over the last 10 years. I am now ready to rebuild the missing West side, however the land on which that stood is currently owned my Marilyn Emmett, owner of Imberhorne Farm, and earmarked to be part of the development. If that happens, the chance will be lost for ever for this part of this historic structure to be put back, and the quadrangle to be complete once again. You can literally see bricks sticking out from the North barn where the rest was connected. Is there anything you can do with regards to stipulating that this small piece of land should be offered to us first rather than straight to the developer? Until recently we had no idea it was earmarked as part of the development, I think it was not originally hence I was not able to raise this concern sooner.

I am sure Mrs Emmett would be on board with the idea of that land being reunited but I suspect might be getting railroaded by the developer into allocating it as part of the total land area. If the number of permitted houses were to be reduced (even by a small percentage!) this would also help with being able to reunite this piece of land with Gullege. Reducing the houses at the western end of the estate would also make the nearest house further away. I would imagine anyone, (apart from the developer) would be happy with this modification.

I am hoping at the very least if the Imberhorne development is allowed to go ahead, and even if you are not able to scale it back significantly, that you are able to conserve this space for us, at least we would have something to look forward to in all this mess and destruction even if Dad is no longer here to see the barns rebuild finished. The barns are used partly for agricultural (storage of hay etc) but also as workshops.

I really hope you can help and I Would appreciate any advice you can give me on or off the record.

Kind regards.

Will Lightburn





Gulledge Farm



B.M. 360.7

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2528

Site Allocations DPD: Main Modifications Response

Main Modification: MM2

ID: 25280
Response Ref: 2528/1/MM2
Respondent: Stephen Grant
Organisation:
On Behalf Of:

[REDACTED]

From: stephenjgrant [REDACTED]
Sent: 23 January 2022 20:35
To: Policy Consultation
Subject: DPD Main Modifications Consultations - Objection to new development East Grinstead

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Sir,

I wish to raise an objection to the proposed large scale developments in East Grinstead.

The proposals make no improvement to the awful road congestion that as a resident of East Grinstead we have to battle every day. Congestion and journey times are a nightmare. Even the councils own research proves this

The proposals will make an already intolerable situation much worse and there is clearly no concern from the council or developers with regards to the current residents lives and the additional problems they will cause.

Schools are almost impossible to get in. NHS services are practically non existent. I moved my elderly mother to East Grinstead and couldn't get her in to a GP surgery.

East Grinstead simply can't cope with the proposed development and i wish to object in the strongest possible terms.

Sincerely

Stephen Grant



2529

Site Allocations DPD: Main Modifications Response

Main Modification: MM2

ID: 25290
Response Ref: 2529/1/MM2
Respondent: Ina Milne
Organisation:
On Behalf Of:

[REDACTED]

From: Ina milne [REDACTED]
Sent: 23 January 2022 20:44
To: Policy Consultation
Cc: Rex Whittaker
Subject: "DPD MAIN Modification Consultation"

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Dear Inspector

Re: My concerns regarding the planned over development in and around East Grinstead.

I am greatly disappointed in your reported unwillingness to seriously evaluate and respond to the concerns of many residents.

I do not know whether you are a fully independent assessor or there were a range of restrictions directly or indirectly put on you.

We are now in 2022 and many things have changed particularly with respect to the environment, air quality and re-wilding and keeping fertile agricultural land in operation. Over development does not contribute to these aims in a positive way.

I live close to the A 22 and over the years my breathing has badly deteriorated and I have been told to suffer from severe Chronic Obstructive Pulmonary Disease.

As the traffic congestion will increase on my and other roads nearby if the planned development is allowed to go ahead- air quality will deteriorate still further. Please will you find it in your heart to have a change of mind and re-evaluate our pleas,

Thank you

Yours sincerely

Ina Milne

2530

Site Allocations DPD: Main Modifications Response

Main Modification: MM2

ID: 25300

Response Ref: 2530/1/MM2

Respondent: Graeme Stagg

Organisation:

On Behalf Of:

[REDACTED]

From: Graeme Stagg [REDACTED]
Sent: 23 January 2022 20:57
To: Policy Consultation
Subject: Additional Housing Plans in Felbridge

[You don't often get email from [REDACTED] Learn why this is important at <http://aka.ms/LearnAboutSenderIdentification>.]

I am writing to make a personal plea against the MidSussex Plans to build large housing developments in Felbridge.

I have lived in Felbridge since 1990 and during that time, there has always been major traffic congestion around the A22 and the A264.

Unfortunately, it has steadily become worse during the last 30 years, to a point where there is constant traffic delays and hold ups, especially around the A22 and A264 junction and then along the A22 through the Felbridge village traffic lights and onwards into East Grinstead.

Consequently, the proposed additional large residential developments currently proposed by the MidSussex county council will only serve to cause severe gridlock to all the roads in Felbridge.

Additionally, the pressure on the local infrastructure of schools, doctors surgeries and amenities is in danger of collapsing with the substantial rise in the local residential population from the new households .

Therefore, I strongly urge the MidSussex county council to review their plans and reconsider the situation and the impact that these new developments will bring?

As far as I am aware, there are no plans for improving either the Felbridge A22/A264 road network nor the provision of any additional amenities to prevent this matter from causing massive problems to my community.

Yours sincerely
Graeme Stagg
[REDACTED]

Sent from my iPhone

2531

Site Allocations DPD: Main Modifications Response

Main Modification: MM2

ID: 25310

Response Ref: 2531/1/MM2

Respondent: Michal Abbott

Organisation:

On Behalf Of:

[REDACTED]

From: Michal Ann Abbott [REDACTED]
Sent: 23 January 2022 21:06
To: Policy Consultation
Subject: DPD Main Modifications Consultation
Attachments: IFG_Representation_Main_Modifications_DPD_Consultation.pdf
Importance: High

You don't often get email from [REDACTED]. [Learn why this is important](#)

To whom it may concern,

I am emailing with regards the plans to build new houses in East Grinstead and Felbridge.

Please find attached, Infrastructure Firsts response to the new builds, which I fully endorse.

I was at the consultation where the estimated traffic, at peak hour, was going to be 100 cars joining the Crawley Down Road. This is clearly inaccurate and biased in favour of the planned housing. Nevertheless, even an additional 100 cars would cause serious congestion, and increase the risk of accidents and deaths along that road, particularly being so near to the school.

Furthermore, the impact this will have on doctors, ambulance, and emergency services which are already stretched; not to mention waste disposal and utilities. I am equally concerned for wildlife and the environment, as land is taken away from the natural habitat and eroded.

I sincerely request that this planning application is denied.

Yours sincerely,

Michal Ann Abbott

Before turning to specific modifications, Infrastructure First are hugely disappointed that the Examiner has not responded to legitimate concerns regarding the severe traffic situation in East Grinstead.

1. Existing traffic issues deemed not relevant
2. Impact on residential streets not considered
3. Cumulative impact not assessed
4. Up to date traffic evidence ignored
5. Committed highway schemes not implemented

1. Existing traffic issues not deemed to be relevant

The Competent Highway Authorities in West Sussex and Surrey and the District Planning Authorities in Mid Sussex and Tandridge ALL recognise and acknowledge the severe traffic problems in Felbridge and East Grinstead. In particular, that the Felbridge junction is already operating over capacity at peak times of the day.

Drivers using the A22 corridor into East Grinstead face significant delays during much of the day due to congestion at the Felbridge, Imberhorne Lane and Lingfield Road junctions ... and this is BEFORE the traffic from the 1,400+ homes already committed in and around East Grinstead start to have an impact on the network.

Mid Sussex District Council insist that the serious traffic issues are not a reason to resist further large scale housing close to the main bottlenecks; arguing that the severe congestion is an existing situation. They simply say that the DPD allocations SA19/SA20 will have limited practical impact on the already congested network.

The Council's position is untenable for two reasons ...

2. Impact on residential streets has not been considered

Firstly the Council ignore the impact of drivers avoiding long queues at junctions by rerouting along residential streets unsuited to through traffic. These routes were not included within the remit of the Strategic Transport Study and therefore not considered. The Competent Highways Authority describes the inevitable increase in rat-running as the result of SA19/20 as 'undesirable'.

The Inspector presiding over the appeal for a scheme of 100 houses adjacent to SA20 (APP/D3830/A/10/2142385) was more forthright, in saying that ...

"Locally, peak-hour congestion on the A22 leads to the use of Imberhorne Lane as a cut-through to the B2110 and as part of a rat-run through the Imberhorne Estate to the town centre. The amount of traffic on the lane leads in turn to congestion on it and this, along with rat-running and traffic speeds can only be to the detriment of the safety of local residents and road users."

This was not a recent statement. It was made than 10 years ago when there were nearly 1,800 fewer houses and substantially less traffic on the roads in East Grinstead.

Since that time, the National Planning Policy Framework (NPPF) has been updated to require planning authorities to consider whether impacts on highways safety are acceptable or not. There is no evidence to suggest that the Council have given ANY consideration to either capacity or safety impacts on parts of the network not covered by their Strategic Transport Study.

3. Cumulative impact has not been assessed

Secondly the Council cannot legitimately dismiss the traffic problems as an existing situation. The National Planning Practice Guidance (NPPG) most up to date advice on Transport Evidence in Plan Making [Paragraph: 03 Reference ID: 54-003-20141010] makes clear that decision makers should "*consider the cumulative impacts of existing and proposed development on transport networks.*"

There are over 8,500 homes committed in the district, many of which are already approved for development. This includes 1,400 in and around East Grinstead alone. None of these have been considered in combination with the allocations in the DPD when assessing the traffic impact.

This cannot be correct.

A 'cumulative' impact is one that increases by successive additions. It is the combined impact of all things added together.

Mid Sussex District Council only assess the incremental traffic impact of the DPD site allocations and have therefore not followed the process required by the NPPG. This approach is therefore also in conflict with the 2021 NPPF paragraph 111.

It is not sufficient just to assess all the DPD site allocations together ... if 'cumulative' is to mean anything at all, its proper interpretation dictates that the DPD allocations need to be assessed TOGETHER with development schemes already in the pipeline. This is the only way to assess the real impact of traffic joining the road network in the future and it is the method prescribed by the NPPG.

The Council's position has striking similarities with the appellant's case in the Land at Kidnappers Lane Recovered Appeal [APP/B1605/W/14/3001717]. The Appeal Inspector rejected the appellant's case that the existing situation can be disregarded and reaffirmed that it is the cumulative effect of all expected development which must be taken into account.

The Secretary of State agreed with the Appeal Inspector and a legal challenge mounted by the developer was dismissed by the High Court (see Appendix 1 for the salient details).

Despite failing to assess the cumulative impact, Mid Sussex District Council confidently say that there is no evidence to demonstrate there would be serious traffic issues in relation to SA19/20.

The Council's own matter statement (msdc-02f-miq-matter-6) describes how the traffic impact of the DPD allocations was assessed on its own and NOT in combination with other committed development. We were greatly encouraged by the Inspector's question to the Council asking whether "the cumulative impact should be the determining factor in assessing traffic impact?". The Council's response reaffirmed the requirement to test a cumulative impact but then described a process in which it wasn't tested!!

By assigning the very significant quantum of committed development to the Reference Case and comparing the overall traffic impact against the DPD Allocations PLUS the Reference Case; the impact of the committed development was simply factored out of the equation.

We were disappointed that the Inspector failed to pick up on this.

Notwithstanding the failure to correctly assess the 'cumulative' impact, the Council's Reference Case predicts that all the primary junctions in and around East Grinstead will be operating over capacity. The extent of this over capacity is understated ... not only as the result of baseline junction capacities being under recorded but also due to the committed development tested in the Reference Case NOT being updated to reflect the published commitments to April 2021.

There is no obvious justification for this.

4. Up to date traffic evidence has been ignored

The Council also, somewhat cynically, refuse to include the most up to date and reliable traffic data for the Felbridge junction in their evidence base. The results from the detailed traffic survey, which they jointly commissioned, were available prior to the regulation 18 consultation and showed that the junction was already significantly over capacity at that time.

The Council say that the WSP investigation is still in draft form as no workable junction improvement options have been identified. However this cannot reasonably apply to the underlying traffic survey, which was based on observations at the time and therefore neither sensitive nor work in progress. Surrey Highways, who jointly commissioned the survey have recently released the detailed traffic data into the public domain.

In responding to the many calls for the 2018 WSP traffic survey results to be included in the DPD evidence base, the Council simply say in Appendix 9 of the Regulation 22 Summary, that the WSP study is not relevant.

A statement that was not reasoned.

Once again, we were encouraged by another of the Inspector's initial questions which asked the Council to explain "the principal conclusions of the WSP study". In their response (msdc-02f-miq-matter-6), the Council failed to mention the study's material findings on junction capacity. Instead they said that the WSP study is not required to address the impact of the DPD and therefore of no direct relevance and that no conclusions could be drawn from the study.

This is clearly NOT true.

Even the most casual observer could conclude that the WSP study found that the Felbridge junction was operating well over capacity as early as 2018.

When asked to explain why their calibrated transport model was so wide of the mark when predicting the Felbridge junction baseline capacity, the Council simply say that the SATURN modelling used for the district-wide study had a different purpose to the detailed LINSIG modelling designed for individual junctions. While this must be correct, it must also bring into question the reliability of the model validation.

The Council stopped short of addressing this question!

We are therefore left to conclude that the Council simply found the WSP findings inconvenient ... in that they undermined the findings of the Strategic Transport Study relied upon to support the DPD.

As a consequence of the WSP traffic evidence being ignored, the District Council along with their Competent Highways Authority are liable to be challenged over not properly validating the transport model.

We don't know whether the obvious flaws in the Strategic Transport Model disguised an otherwise severe impact on the road network in East Grinstead. But without a 'severe impact' the DPD is not required to deliver any highways mitigation ... which in turn means that any developer funded road improvements are 'nice to have' and not an essential condition of SA19/20 going forward.

The Strategic Transport Study does however acknowledge that significant mitigation of the A264/A22 would be required to significantly reduce the congestion at the Felbridge junction and that to be fully effective would require land outside the highway boundary.

But if, as usually turns out to be the case, there are no practical or cost effective solutions identified or that there is simply insufficient funding to deliver a solution, then the roads will stay as they are and the traffic from SA19/20 will simply add to the unacceptable levels of congestion and rat-running.

For both regulation 18 and 19 consultations, West Sussex Highways acknowledged that local junction improvements may not be deliverable and requested the District Council to update the DPD to reflect this.

However, these requests were ignored without explanation.

5. Committed highway schemes have not been implemented

The following committed highway improvements for the Felbridge and Imberhorne junctions are overdue with little prospect of delivery ...

- Synchronisation of signals at Felbridge and Imberhorne Lane junctions were developer funded and a condition of West Sussex Highways withdrawing their highways objection to the Oaks development in 2011 – Surrey Highways have confirmed that the synchronisation has not occurred due to technical difficulties and is likely to be unworkable as the result of flow interruptions due to bus stops, side roads etc.
- Reconfiguration of the Felbridge junction A264 approach arm for both lanes to turn right towards East Grinstead has been used as mitigation for several large schemes – Surrey Highways do not support this scheme and confirmed that it has been tried before but immediately withdrawn due to an unacceptable increase in collisions.
- In the last 10 years, several large schemes have made substantial contributions towards the cost of the Atkins Stage 3 junction improvements to help offset the impact of additional traffic. These highway interventions have been factored into the Council's strategic transport models since 2013, but West Sussex Highways say that there is still no timetable for their implementation.

To ensure that effective traffic mitigation is actually delivered, we respectfully ask the Inspector to consider making it a condition of approving SA19/20.

Appendix 1 - High Court Ruling re: Residual Cumulative Impact

In August 2014, the planning committee for Cheltenham Borough Council refused a planning application by Bovis Homes in respect of a residential development of 650 homes. This was against the advice of planning officers and the local highways authority didn't raise any objections to the scheme.

The decision notice lists unacceptable traffic congestion as one of the reasons for refusal.

Bovis Homes appealed the decision and a public inquiry took place in September 2015. They argued that detailed transport studies showed that the local roads were already severely congested but that the additional traffic wouldn't make things much worse ...

- *"there would be limited practical difference in terms of traffic impact on the local road network whether or not the appeal scheme proceeds"*
- *"The highways network around the site suffers some congestion but the NPPF test is whether the additional impact of a scheme would be severe"*
- *Shurdington Road is already overloaded. Existing traffic on Shurdington Road would be displaced onto other routes by traffic from the development*

The Council employed consultants to review the transport work supporting the scheme and argued that ...

- *"In limited time, the review identified faults in the transport analysis. More time would have uncovered more faults. A defensive response to criticism and a lack of transparency engenders suspicion that there is something to hide."*
- *"Traffic forecasting and modelling was undertaken using the Council's SATURN based model. It is not inherently unreliable but it is a strategic model, outputs from which need to be adjusted to obtain the detail relevant to consideration of this development. There are concerns about its accuracy for this purpose."*

The appeal inspector rejected the developer's arguments and in January 2016 gave his reasons ...

- *"It is an often-expressed view that development should be expected to do no more than 'wash its own face' and not solve all existing unrelated problems. In relation to transport, that appears to be the view of the appellant, the local authority and the local highway authority."*
- *"The third bullet of NPPF paragraph 32 refers not to the additional impact of a scheme, as the appellant asserts but to residual "cumulative" effects, implying that it is the cumulative effect of all expected development which must be taken into account, rather than the individual contribution of each development in turn, which is likely to be (as in the present case) marginal."*
- *"Whilst I can agree therefore, that the development should not need to solve all existing unrelated transport problems, the existing or future "in any event" situation on the highway network, is not an*

unrelated problem which evaluation of the proposed development should ignore. It is a related problem which is highly pertinent to the evaluation of the current appeal proposal."

Due to the strategic nature of the Bovis Homes scheme, the Secretary of State intervened ... upholding the view of the appeal inspector and dismissing the appeal in May 2016.

In his judgement he agreed with the Inspector's analysis of highways issues ...

- *Overall, he agrees with the Inspector that, taking account of the measures which are included in the s106 agreement, the residual cumulative effects of development proposed would increase demand for use of sections of the highway network which are already operating at over-capacity levels, contributing to a severe impact on a wider area of Cheltenham as traffic is displaced, contrary to both adopted and emerging policies. Paragraph 32 of the Framework states that development should only be prevented or refused on transport grounds where the residual cumulative impacts of development are severe.*
- *The Secretary of State concludes that granting permission for the appeal scheme would be contrary to the development plan overall due to the severe residual cumulative transport impacts.*

Bovis Homes challenged the validity of the Secretary of State's decision on a misinterpretation of 'Residual Cumulative Impact' and applied to High Court to overturn it.

In September 2016, Mr Justice Holgate presided over a hearing to consider whether there was a case to answer.

He was not persuaded that the Inspector and Secretary of State erred in law by taking into account of the existing highway situation when resolving the paragraph 32 NPPF questions. In particular, the Judge noted that it would be open to a decision taker to rationally conclude that a given development could wash its own face in highway impact terms, but due to existing over capacity, the residual cumulative impacts of the development could be severe.

- *"The conclusions of the Inspector and the Secretary of State adverse to the Bovis proposal rested on the third bullet point of NPPF paragraph 32, the second half of which is the relevant provision. It reads: "Development should only be prevented or refused on transport grounds where the residual cumulative impacts of development are severe."*
- *"He recorded in paragraph 221 the view of Bovis Homes and also the local authority and the County Council, that the development should be expected to do no more than "wash its own face" and not solve all existing unrelated problems. He contrasted that with the position of third parties pointing out that the existing situation into which the development would be placed is already not suitable in terms of highway capacity and that the future situation would be far worse, and therefore even less acceptable, as a location for the development of 650 dwellings."*
- *"Taking up the third bullet point of NPPF paragraph 32, the Inspector pointed out in paragraph 223 of his report that the Framework refers not simply to the additional impact of the scheme, as had been asserted by the appellants, but to residual "cumulative" effects, implying that it is the cumulative effect of all expected development which must be taken into account in context rather than just the*

individual contribution of each development in turn which is likely to be, as in the present case, marginal."

- *"In view of his earlier reasoning there was no need for the Inspector to rely in addition upon circular 2/2013, but it did serve to emphasise that the existing levels of congestion were relevant, and not irrelevant as some parties had contended, to determining whether there would be severe residual cumulative impacts in breach of paragraph 32 of the NPPF if the proposed development were to go ahead."*
- *"Furthermore, and in any event, it is also plain from paragraphs 14 and 32 of the Secretary of State's decision letter that he correctly applied the "severe residual cumulative impact" test in the NPPF and not any different test. It cannot be said that the decision-maker has misinterpreted paragraph 32 of the NPPF. Nor can it be said that in using his judgment regarding the application of that test, he has misapplied it in such a way as to be open to challenge on public law grounds"*

The High Court rejected the challenge and in doing so made an important ruling on the correct interpretation of the National Planning Policy's meaning of residual cumulative impacts of development.

<https://www.bailii.org/ew/cases/EWHC/Admin/2016/2952.html>

MM16 – Updated Housing Trajectory

The primary objective of the DPD is to meet the residual housing need identified by the District Plan Examination in 2018 and to allocate sufficient housing sites to address the residual need for the district between 2024 and 2031.

The regulation 18 version of the DPD confirms the residual need to be 1,507 homes ...

"2.25 The revised housing supply figures set out in Table 2.3, illustrates that following consideration for updated completion, commitments and windfall figures that the residual currently necessary to fully meet the district housing requirement is 1,507 dwellings as at April 2019."

The regulation 19 version of the DPD shows that the residual need had reduced by 227 ...

2.29 The revised housing supply figures set out in Table 2.3, illustrates that following consideration for updated completion, commitments and windfall figures that the residual currently necessary to fully meet the district housing requirement is 1,280 dwellings as at 1st April 2020.

And the latest main modifications version of the DPD shows the residual need had fallen by a further 483 ...

2.29 The revised housing supply figures set out in Table 2.3, illustrates that following consideration for updated completion, commitments and windfall figures that the residual currently necessary to fully meet the district housing requirement is 797 dwellings as at 1st April 2021.

So in the two years it has taken to progress the DPD to the Main Modification stage, the number of houses it set out to allocate has officially reduced by very nearly half, from 1,507 to 797 homes.

This excludes the new homes approved in the 10 months since April 2021.

Of course there is no justification for ignoring these latest approvals in the latest version of the DPD as the Council will be fully aware of them. Using the information published on the Council's website we have reviewed the planning approvals since April 2021 and excluded those already included in the published list of housing commitments (MSDC-06b).

We have calculated the up to date residual need is now around 400 homes ... which leaves us with the very probable conclusion that the uplifted trajectory will be fully met by 2024/25 without needing to allocate any further schemes in the DPD.

However, the main modification version of the DPD still allocates schemes for a total of 1,704 homes. This represents an official oversupply of 907 as at April 2021 ... and using up to date figures, an oversupply nearer to 1,300.

Despite the Council's position stated during the public hearings that they do not accept the need for a buffer due to the robustness of their housing commitments; some level of oversupply is clearly prudent.

Tests of soundness require the Plan to be proportionate and justified. We don't believe that a fourfold oversupply meets these tests ... especially as there are very legitimate arguments which bring into question the sustainability of the 750 homes allocated at SA19/SA20.

MM22 – SA20 SANG monitoring

First of all it is worth reiterating that the residual housing need identified at the examination of the District Plan was made conditional on there being no further harm to the integrity of European Habitat Sites in Ashdown Forest. This was clearly stated in paragraph 65 of the Inspector's final report dated 12th March 2018.

The Council have not presented any evidence to demonstrate that allocations in the DPD would not result in further harm to the Ashdown Forest SPA.

Main Modification MM22 adds wording relating to SANG provision and mitigation by adding a requirement for regular monitoring of the proposed SANG. However, The District Council are already committed to monitoring the effectiveness of their SANG mitigation under DP17 ... and therefore MM22 is somewhat superfluous.

Of course, committing to regular SANG monitoring doesn't mean that it will happen. Despite a similar commitment to regular monitor the existing Ashplatts Wood SANG, no monitoring had been undertaken since becoming operational in 2015. Although the latest Habitats Regulation Assessment (HRA) says that visitor surveys have now been undertaken following the examination hearings in June.

One of the Council's post-hearing actions was to demonstrate the effectiveness of their existing SANG mitigation; but their response (MSDC13) was far from compelling and presented no evidence to show that the Ashplatts Wood SANG had been successful in reducing visitor pressure on the Ashdown Forest SPA.

The Council clearly believe that SANG effectiveness is a forgone conclusion.

We submitted our own response (REP2383-010) highlighting the lack of evidence in the Council's post-hearing written submission and we are disappointed that our concerns have been apparently dismissed.

A further commitment to regularly monitor the proposed SANG as set out in the MM22 is clearly welcome; but what if monitoring shows that the SANG isn't successful in reducing visitor pressure from new development?

The Habitats legislation is clear that decision makers are required to apply the precautionary principle in evaluating adverse impacts on a protected site. In simple terms this means that it is 'better to be safe than sorry'. This surely mandates that approval of sites SA19/20 should depend upon the results of the visitor surveys carried out in June.

The Council have currently no evidence to demonstrate the success of their Ashdown Forest mitigation strategy and it would be premature to allocate SA19/20 prior to the forthcoming publication of the evidence provided by these visitor studies.

Indeed the approval of large scale housing within the accepted zone of influence with no evidence to support the HRA claim that adverse impacts can be ruled out is potentially open to legal challenge.

2532

Site Allocations DPD: Main Modifications Response

Main Modification: MM2

ID: 25320
Response Ref: 2532/1/MM2
Respondent: Cris Payne
Organisation:
On Behalf Of:

From: Cris Payne [REDACTED]
Sent: 23 January 2022 21:32
To: Policy Consultation
Subject: DPD Main Modifications Consultation

You don't often get email from [REDACTED] [Learn why this is important](#)

Dear sir/madam

I wish to register my views regarding the housing developments and modifications outlined in the above consultation.

I do not feel that concerns regarding the pressures on roads, schools, doctors and other infrastructure have been adequately addressed.

People moving to the area have no choice in either schools or GP's as both are oversubscribed and so they are allocated where authorities see fit. Increased population will create even greater pressure and I see no plans to mitigate this.

My dentist for the last 30 years has recently gone private, and it has proved impossible for my family to sign on with an NHS dentist - all books are currently closed. New residents will likewise be unable to find a dentist.

Roads are congested. When attending County level training as a teacher, I had to allow as much time to get out of East Grinstead as to cross the County and things have got worse in recent years. The effects of roadworks or accidents so easily cause gridlock in the town because the infrastructure does not support the cars of the current population, let alone a bigger population. There are currently few alternatives to driving - provision for cycling is poor and too dangerous to make it a viable alternative.

Until these issues are properly addressed, I can see no way that East Grinstead can support an increase in population such as is suggested in the proposed developments.

Yours faithfully
Cris Payne

2533

Site Allocations DPD: Main Modifications Response

Main Modification: MM2

ID: 25330

Response Ref: 2533/1/MM2

Respondent: H M Lincoln

Organisation:

On Behalf Of:

[REDACTED]

From: H M LINCOLN [REDACTED]
Sent: 23 January 2022 22:29
To: Policy Consultation
Subject: Traffic and infrastructure along the A22

You don't often get email from [REDACTED]. [Learn why this is important](#)

Dear Sir

I am writing in response of the proposal to build yet more homes in East Grinstead and Felbridge.

Since moving to East Grinstead the amount of traffic has increased so much that it can take 20 mins just to travel a couple of miles.

The A22 and the A264 was not built and is not being maintained to be able to accommodate this high volume of traffic, and any further increase in traffic volume.

I work for the essential services and I leave and return from work outside the main traffic times. It often takes me up to 5 minutes to exit my drive, due to the amount of traffic. The traffic is often queued past the traffic lights at imberhorne junction and The Star junction all the way up the road into East Grinstead and into Surrey the other way causing problems for the emergency services, and the local residents.

The road surface is a constant problem and is once again breaking up, with man covers dropping and vehicles trying to avoid the pot holes.

The vehicles are also struggling driving along the road with the uneven surface, as they try to avoid the pot holes and tyres being damaged. The empty lorries and vans also cause so much noise especially at night as they jump in and out of a pot holes, often making us jump, and thinking another accident.

This road has had over five sets of road works, working on it causing traffic queues in the last few months, and once again we have another set that is going to take at least five weeks I have never known a road that has required so many road works, that affect businesses and the locals. It is costing so much money that appears to be going down the drains. All of this is not helped by the volume of traffic.

This high volume of traffic is also contributing to pollution in the area.

East Grinstead needs a bypass before more homes are built and more essential services are also required.

How can this proposal of building more homes on farm land and the country side going to benefit East Grinstead?

During the covid pandemic we were all advised to exercise regularly, either by walking or cycling locally to where we live. There is evidence that exercise is beneficial for our mental health, and well being. The local area that we use for walking or cycling is now being built on to the benefit of the developers and not the local residents. How are we going to benefit from the country side once it is built on?

The other challenge is that the infrastructure is not in place in and around East Grinstead to support more homes and more people.

The Doctor's and the local hospitals cannot cope with any more people, and the local schools are also full to bursting point.

Please think of the residents of East Grinstead.

Kind Regards
Local East Grinstead Resident.

[Sent from the all-new AOL app for Android](#)

From: Susan Paterson [REDACTED]
Sent: 23 January 2022 23:15
To: Policy Consultation
Subject: DPD Main Modifications Consultation

You don't often get email from [REDACTED] [learn why this is important](#)

It would seem that Mid-Sussex District Council are determined to push ahead with their plans for more and more housing in the East Grinstead and Felbridge areas despite the wholly unsustainable pressure on the roads and other essential infrastructure in the area, such as schools, doctors, dentists, etc. All of which are now at breaking point due to the incessant increase in the local population.

We have lived in East Grinstead for ten years and in that time there has been at least three large housing estates built, plus innumerable smaller developments and infill projects and there is already another large development of 200 houses currently being built on the Turner's Hill Road. This in itself will create rat-runs and dangerous levels of traffic on local roads which were never designed to cope with the number of motor vehicles which will inevitably ensue. How are we to promote sustainable means of transport such as cycling or encourage children to walk to school when they are faced with the huge increase in hazardous, polluting vehicles on local roads?

The A22 is not a dual carriageway like the A21 or the A23 and if another 800-900 houses are built in Felbridge, the Star junction (already a known source of major congestion) will just deteriorate into a perpetual state of gridlock at peak traffic times. The resultant residual cumulative impact on the road network in Felbridge and East Grinstead would be beyond severe.

Susan & Bill Hose

East Grinstead

2535

Site Allocations DPD: Main Modifications Response

Main Modification: MM2

ID: 25350

Response Ref: 2535/1/MM2

Respondent: Susan Hose

Organisation:

On Behalf Of:

[REDACTED]

From: Michaela Bordessoule [REDACTED]
Sent: 23 January 2022 23:27
To: Policy Consultation
Subject: DPD Main Modifications Consultation
Attachments: IFG_Representation_Main_Modifications_DPD_Consultation.pdf

You don't often get email from [REDACTED]. [Learn why this is important](#)

Dear Sir/Madam,

Please find the attached document to be taken into consideration. I am an East Grinstead resident and support views in this document that relates to the topic of large scale development around East Grinstead.

Regards,

Mrs. Michaela BORDESSOULE

[REDACTED]

2536

Site Allocations DPD: Main Modifications Response

Main Modification: MM2

ID: 25360

Response Ref: 2536/1/MM2

Respondent: Michaela Bordessoule

Organisation:

On Behalf Of:

Before turning to specific modifications, Infrastructure First are hugely disappointed that the Examiner has not responded to legitimate concerns regarding the severe traffic situation in East Grinstead.

1. Existing traffic issues deemed not relevant
2. Impact on residential streets not considered
3. Cumulative impact not assessed
4. Up to date traffic evidence ignored
5. Committed highway schemes not implemented

1. Existing traffic issues not deemed to be relevant

The Competent Highway Authorities in West Sussex and Surrey and the District Planning Authorities in Mid Sussex and Tandridge ALL recognise and acknowledge the severe traffic problems in Felbridge and East Grinstead. In particular, that the Felbridge junction is already operating over capacity at peak times of the day.

Drivers using the A22 corridor into East Grinstead face significant delays during much of the day due to congestion at the Felbridge, Imberhorne Lane and Lingfield Road junctions ... and this is BEFORE the traffic from the 1,400+ homes already committed in and around East Grinstead start to have an impact on the network.

Mid Sussex District Council insist that the serious traffic issues are not a reason to resist further large scale housing close to the main bottlenecks; arguing that the severe congestion is an existing situation. They simply say that the DPD allocations SA19/SA20 will have limited practical impact on the already congested network.

The Council's position is untenable for two reasons ...

2. Impact on residential streets has not been considered

Firstly the Council ignore the impact of drivers avoiding long queues at junctions by rerouting along residential streets unsuited to through traffic. These routes were not included within the remit of the Strategic Transport Study and therefore not considered. The Competent Highways Authority describes the inevitable increase in rat-running as the result of SA19/20 as 'undesirable'.

The Inspector presiding over the appeal for a scheme of 100 houses adjacent to SA20 (APP/D3830/A/10/2142385) was more forthright, in saying that ...

"Locally, peak-hour congestion on the A22 leads to the use of Imberhorne Lane as a cut-through to the B2110 and as part of a rat-run through the Imberhorne Estate to the town centre. The amount of traffic on the lane leads in turn to congestion on it and this, along with rat-running and traffic speeds can only be to the detriment of the safety of local residents and road users."

This was not a recent statement. It was made than 10 years ago when there were nearly 1,800 fewer houses and substantially less traffic on the roads in East Grinstead.

Since that time, the National Planning Policy Framework (NPPF) has been updated to require planning authorities to consider whether impacts on highways safety are acceptable or not. There is no evidence to suggest that the Council have given ANY consideration to either capacity or safety impacts on parts of the network not covered by their Strategic Transport Study.

3. Cumulative impact has not been assessed

Secondly the Council cannot legitimately dismiss the traffic problems as an existing situation. The National Planning Practice Guidance (NPPG) most up to date advice on Transport Evidence in Plan Making [Paragraph: 03 Reference ID: 54-003-20141010] makes clear that decision makers should "*consider the cumulative impacts of existing and proposed development on transport networks.*"

There are over 8,500 homes committed in the district, many of which are already approved for development. This includes 1,400 in and around East Grinstead alone. None of these have been considered in combination with the allocations in the DPD when assessing the traffic impact.

This cannot be correct.

A 'cumulative' impact is one that increases by successive additions. It is the combined impact of all things added together.

Mid Sussex District Council only assess the incremental traffic impact of the DPD site allocations and have therefore not followed the process required by the NPPG. This approach is therefore also in conflict with the 2021 NPPF paragraph 111.

It is not sufficient just to assess all the DPD site allocations together ... if 'cumulative' is to mean anything at all, its proper interpretation dictates that the DPD allocations need to be assessed TOGETHER with development schemes already in the pipeline. This is the only way to assess the real impact of traffic joining the road network in the future and it is the method prescribed by the NPPG.

The Council's position has striking similarities with the appellant's case in the Land at Kidnappers Lane Recovered Appeal [APP/B1605/W/14/3001717]. The Appeal Inspector rejected the appellant's case that the existing situation can be disregarded and reaffirmed that it is the cumulative effect of all expected development which must be taken into account.

The Secretary of State agreed with the Appeal Inspector and a legal challenge mounted by the developer was dismissed by the High Court (see Appendix 1 for the salient details).

Despite failing to assess the cumulative impact, Mid Sussex District Council confidently say that there is no evidence to demonstrate there would be serious traffic issues in relation to SA19/20.

The Council's own matter statement (msdc-02f-miq-matter-6) describes how the traffic impact of the DPD allocations was assessed on its own and NOT in combination with other committed development. We were greatly encouraged by the Inspector's question to the Council asking whether "the cumulative impact should be the determining factor in assessing traffic impact?". The Council's response reaffirmed the requirement to test a cumulative impact but then described a process in which it wasn't tested!!

By assigning the very significant quantum of committed development to the Reference Case and comparing the overall traffic impact against the DPD Allocations PLUS the Reference Case; the impact of the committed development was simply factored out of the equation.

We were disappointed that the Inspector failed to pick up on this.

Notwithstanding the failure to correctly assess the 'cumulative' impact, the Council's Reference Case predicts that all the primary junctions in and around East Grinstead will be operating over capacity. The extent of this over capacity is understated ... not only as the result of baseline junction capacities being under recorded but also due to the committed development tested in the Reference Case NOT being updated to reflect the published commitments to April 2021.

There is no obvious justification for this.

4. Up to date traffic evidence has been ignored

The Council also, somewhat cynically, refuse to include the most up to date and reliable traffic data for the Felbridge junction in their evidence base. The results from the detailed traffic survey, which they jointly commissioned, were available prior to the regulation 18 consultation and showed that the junction was already significantly over capacity at that time.

The Council say that the WSP investigation is still in draft form as no workable junction improvement options have been identified. However this cannot reasonably apply to the underlying traffic survey, which was based on observations at the time and therefore neither sensitive nor work in progress. Surrey Highways, who jointly commissioned the survey have recently released the detailed traffic data into the public domain.

In responding to the many calls for the 2018 WSP traffic survey results to be included in the DPD evidence base, the Council simply say in Appendix 9 of the Regulation 22 Summary, that the WSP study is not relevant.

A statement that was not reasoned.

Once again, we were encouraged by another of the Inspector's initial questions which asked the Council to explain "the principal conclusions of the WSP study". In their response (msdc-02f-miq-matter-6), the Council failed to mention the study's material findings on junction capacity. Instead they said that the WSP study is not required to address the impact of the DPD and therefore of no direct relevance and that no conclusions could be drawn from the study.

This is clearly NOT true.

Even the most casual observer could conclude that the WSP study found that the Felbridge junction was operating well over capacity as early as 2018.

When asked to explain why their calibrated transport model was so wide of the mark when predicting the Felbridge junction baseline capacity, the Council simply say that the SATURN modelling used for the district-wide study had a different purpose to the detailed LINSIG modelling designed for individual junctions. While this must be correct, it must also bring into question the reliability of the model validation.

The Council stopped short of addressing this question!

We are therefore left to conclude that the Council simply found the WSP findings inconvenient ... in that they undermined the findings of the Strategic Transport Study relied upon to support the DPD.

As a consequence of the WSP traffic evidence being ignored, the District Council along with their Competent Highways Authority are liable to be challenged over not properly validating the transport model.

We don't know whether the obvious flaws in the Strategic Transport Model disguised an otherwise severe impact on the road network in East Grinstead. But without a 'severe impact' the DPD is not required to deliver any highways mitigation ... which in turn means that any developer funded road improvements are 'nice to have' and not an essential condition of SA19/20 going forward.

The Strategic Transport Study does however acknowledge that significant mitigation of the A264/A22 would be required to significantly reduce the congestion at the Felbridge junction and that to be fully effective would require land outside the highway boundary.

But if, as usually turns out to be the case, there are no practical or cost effective solutions identified or that there is simply insufficient funding to deliver a solution, then the roads will stay as they are and the traffic from SA19/20 will simply add to the unacceptable levels of congestion and rat-running.

For both regulation 18 and 19 consultations, West Sussex Highways acknowledged that local junction improvements may not be deliverable and requested the District Council to update the DPD to reflect this.

However, these requests were ignored without explanation.

5. Committed highway schemes have not been implemented

The following committed highway improvements for the Felbridge and Imberhorne junctions are overdue with little prospect of delivery ...

- Synchronisation of signals at Felbridge and Imberhorne Lane junctions were developer funded and a condition of West Sussex Highways withdrawing their highways objection to the Oaks development in 2011 – Surrey Highways have confirmed that the synchronisation has not occurred due to technical difficulties and is likely to be unworkable as the result of flow interruptions due to bus stops, side roads etc.
- Reconfiguration of the Felbridge junction A264 approach arm for both lanes to turn right towards East Grinstead has been used as mitigation for several large schemes – Surrey Highways do not support this scheme and confirmed that it has been tried before but immediately withdrawn due to an unacceptable increase in collisions.
- In the last 10 years, several large schemes have made substantial contributions towards the cost of the Atkins Stage 3 junction improvements to help offset the impact of additional traffic. These highway interventions have been factored into the Council's strategic transport models since 2013, but West Sussex Highways say that there is still no timetable for their implementation.

To ensure that effective traffic mitigation is actually delivered, we respectfully ask the Inspector to consider making it a condition of approving SA19/20.

Appendix 1 - High Court Ruling re: Residual Cumulative Impact

In August 2014, the planning committee for Cheltenham Borough Council refused a planning application by Bovis Homes in respect of a residential development of 650 homes. This was against the advice of planning officers and the local highways authority didn't raise any objections to the scheme.

The decision notice lists unacceptable traffic congestion as one of the reasons for refusal.

Bovis Homes appealed the decision and a public inquiry took place in September 2015. They argued that detailed transport studies showed that the local roads were already severely congested but that the additional traffic wouldn't make things much worse ...

- *"there would be limited practical difference in terms of traffic impact on the local road network whether or not the appeal scheme proceeds"*
- *"The highways network around the site suffers some congestion but the NPPF test is whether the additional impact of a scheme would be severe"*
- *Shurdington Road is already overloaded. Existing traffic on Shurdington Road would be displaced onto other routes by traffic from the development*

The Council employed consultants to review the transport work supporting the scheme and argued that ...

- *"In limited time, the review identified faults in the transport analysis. More time would have uncovered more faults. A defensive response to criticism and a lack of transparency engenders suspicion that there is something to hide."*
- *"Traffic forecasting and modelling was undertaken using the Council's SATURN based model. It is not inherently unreliable but it is a strategic model, outputs from which need to be adjusted to obtain the detail relevant to consideration of this development. There are concerns about its accuracy for this purpose."*

The appeal inspector rejected the developer's arguments and in January 2016 gave his reasons ...

- *"It is an often-expressed view that development should be expected to do no more than 'wash its own face' and not solve all existing unrelated problems. In relation to transport, that appears to be the view of the appellant, the local authority and the local highway authority."*
- *"The third bullet of NPPF paragraph 32 refers not to the additional impact of a scheme, as the appellant asserts but to residual "cumulative" effects, implying that it is the cumulative effect of all expected development which must be taken into account, rather than the individual contribution of each development in turn, which is likely to be (as in the present case) marginal."*
- *"Whilst I can agree therefore, that the development should not need to solve all existing unrelated transport problems, the existing or future "in any event" situation on the highway network, is not an*

unrelated problem which evaluation of the proposed development should ignore. It is a related problem which is highly pertinent to the evaluation of the current appeal proposal."

Due to the strategic nature of the Bovis Homes scheme, the Secretary of State intervened ... upholding the view of the appeal inspector and dismissing the appeal in May 2016.

In his judgement he agreed with the Inspector's analysis of highways issues ...

- *Overall, he agrees with the Inspector that, taking account of the measures which are included in the s106 agreement, the residual cumulative effects of development proposed would increase demand for use of sections of the highway network which are already operating at over-capacity levels, contributing to a severe impact on a wider area of Cheltenham as traffic is displaced, contrary to both adopted and emerging policies. Paragraph 32 of the Framework states that development should only be prevented or refused on transport grounds where the residual cumulative impacts of development are severe.*
- *The Secretary of State concludes that granting permission for the appeal scheme would be contrary to the development plan overall due to the severe residual cumulative transport impacts.*

Bovis Homes challenged the validity of the Secretary of State's decision on a misinterpretation of 'Residual Cumulative Impact' and applied to High Court to overturn it.

In September 2016, Mr Justice Holgate presided over a hearing to consider whether there was a case to answer.

He was not persuaded that the Inspector and Secretary of State erred in law by taking into account of the existing highway situation when resolving the paragraph 32 NPPF questions. In particular, the Judge noted that it would be open to a decision taker to rationally conclude that a given development could wash its own face in highway impact terms, but due to existing over capacity, the residual cumulative impacts of the development could be severe.

- *"The conclusions of the Inspector and the Secretary of State adverse to the Bovis proposal rested on the third bullet point of NPPF paragraph 32, the second half of which is the relevant provision. It reads: "Development should only be prevented or refused on transport grounds where the residual cumulative impacts of development are severe."*
- *"He recorded in paragraph 221 the view of Bovis Homes and also the local authority and the County Council, that the development should be expected to do no more than "wash its own face" and not solve all existing unrelated problems. He contrasted that with the position of third parties pointing out that the existing situation into which the development would be placed is already not suitable in terms of highway capacity and that the future situation would be far worse, and therefore even less acceptable, as a location for the development of 650 dwellings."*
- *"Taking up the third bullet point of NPPF paragraph 32, the Inspector pointed out in paragraph 223 of his report that the Framework refers not simply to the additional impact of the scheme, as had been asserted by the appellants, but to residual "cumulative" effects, implying that it is the cumulative effect of all expected development which must be taken into account in context rather than just the*

individual contribution of each development in turn which is likely to be, as in the present case, marginal."

- *"In view of his earlier reasoning there was no need for the Inspector to rely in addition upon circular 2/2013, but it did serve to emphasise that the existing levels of congestion were relevant, and not irrelevant as some parties had contended, to determining whether there would be severe residual cumulative impacts in breach of paragraph 32 of the NPPF if the proposed development were to go ahead."*
- *"Furthermore, and in any event, it is also plain from paragraphs 14 and 32 of the Secretary of State's decision letter that he correctly applied the "severe residual cumulative impact" test in the NPPF and not any different test. It cannot be said that the decision-maker has misinterpreted paragraph 32 of the NPPF. Nor can it be said that in using his judgment regarding the application of that test, he has misapplied it in such a way as to be open to challenge on public law grounds"*

The High Court rejected the challenge and in doing so made an important ruling on the correct interpretation of the National Planning Policy's meaning of residual cumulative impacts of development.

<https://www.bailii.org/ew/cases/EWHC/Admin/2016/2952.html>

MM16 – Updated Housing Trajectory

The primary objective of the DPD is to meet the residual housing need identified by the District Plan Examination in 2018 and to allocate sufficient housing sites to address the residual need for the district between 2024 and 2031.

The regulation 18 version of the DPD confirms the residual need to be 1,507 homes ...

"2.25 The revised housing supply figures set out in Table 2.3, illustrates that following consideration for updated completion, commitments and windfall figures that the residual currently necessary to fully meet the district housing requirement is 1,507 dwellings as at April 2019."

The regulation 19 version of the DPD shows that the residual need had reduced by 227 ...

2.29 The revised housing supply figures set out in Table 2.3, illustrates that following consideration for updated completion, commitments and windfall figures that the residual currently necessary to fully meet the district housing requirement is 1,280 dwellings as at 1st April 2020.

And the latest main modifications version of the DPD shows the residual need had fallen by a further 483 ...

2.29 The revised housing supply figures set out in Table 2.3, illustrates that following consideration for updated completion, commitments and windfall figures that the residual currently necessary to fully meet the district housing requirement is 797 dwellings as at 1st April 2021.

So in the two years it has taken to progress the DPD to the Main Modification stage, the number of houses it set out to allocate has officially reduced by very nearly half, from 1,507 to 797 homes.

This excludes the new homes approved in the 10 months since April 2021.

Of course there is no justification for ignoring these latest approvals in the latest version of the DPD as the Council will be fully aware of them. Using the information published on the Council's website we have reviewed the planning approvals since April 2021 and excluded those already included in the published list of housing commitments (MSDC-06b).

We have calculated the up to date residual need is now around 400 homes ... which leaves us with the very probable conclusion that the uplifted trajectory will be fully met by 2024/25 without needing to allocate any further schemes in the DPD.

However, the main modification version of the DPD still allocates schemes for a total of 1,704 homes. This represents an official oversupply of 907 as at April 2021 ... and using up to date figures, an oversupply nearer to 1,300.

Despite the Council's position stated during the public hearings that they do not accept the need for a buffer due to the robustness of their housing commitments; some level of oversupply is clearly prudent.

Tests of soundness require the Plan to be proportionate and justified. We don't believe that a fourfold oversupply meets these tests ... especially as there are very legitimate arguments which bring into question the sustainability of the 750 homes allocated at SA19/SA20.

MM22 – SA20 SANG monitoring

First of all it is worth reiterating that the residual housing need identified at the examination of the District Plan was made conditional on there being no further harm to the integrity of European Habitat Sites in Ashdown Forest. This was clearly stated in paragraph 65 of the Inspector's final report dated 12th March 2018.

The Council have not presented any evidence to demonstrate that allocations in the DPD would not result in further harm to the Ashdown Forest SPA.

Main Modification MM22 adds wording relating to SANG provision and mitigation by adding a requirement for regular monitoring of the proposed SANG. However, The District Council are already committed to monitoring the effectiveness of their SANG mitigation under DP17 ... and therefore MM22 is somewhat superfluous.

Of course, committing to regular SANG monitoring doesn't mean that it will happen. Despite a similar commitment to regular monitor the existing Ashplatts Wood SANG, no monitoring had been undertaken since becoming operational in 2015. Although the latest Habitats Regulation Assessment (HRA) says that visitor surveys have now been undertaken following the examination hearings in June.

One of the Council's post-hearing actions was to demonstrate the effectiveness of their existing SANG mitigation; but their response (MSDC13) was far from compelling and presented no evidence to show that the Ashplatts Wood SANG had been successful in reducing visitor pressure on the Ashdown Forest SPA.

The Council clearly believe that SANG effectiveness is a forgone conclusion.

We submitted our own response (REP2383-010) highlighting the lack of evidence in the Council's post-hearing written submission and we are disappointed that our concerns have been apparently dismissed.

A further commitment to regularly monitor the proposed SANG as set out in the MM22 is clearly welcome; but what if monitoring shows that the SANG isn't successful in reducing visitor pressure from new development?

The Habitats legislation is clear that decision makers are required to apply the precautionary principle in evaluating adverse impacts on a protected site. In simple terms this means that it is 'better to be safe than sorry'. This surely mandates that approval of sites SA19/20 should depend upon the results of the visitor surveys carried out in June.

The Council have currently no evidence to demonstrate the success of their Ashdown Forest mitigation strategy and it would be premature to allocate SA19/20 prior to the forthcoming publication of the evidence provided by these visitor studies.

Indeed the approval of large scale housing within the accepted zone of influence with no evidence to support the HRA claim that adverse impacts can be ruled out is potentially open to legal challenge.

2537

Site Allocations DPD: Main Modifications Response

Main Modification: MM2

ID: 25370

Response Ref: 2537/1/MM2

Respondent: Andrew Nicol

Organisation:

On Behalf Of:

From: Andrew Nicol [REDACTED]
Sent: 23 January 2022 23:36
To: Policy Consultation
Subject: Objection to SA19 SHELAA 196 - 200 homes Felbridge developer Barratt Homes

You don't often get email from [REDACTED] [Learn why this is important](#)

Dear Sirs/Madam

I am writing in the hope and belief that my concerns are read and acknowledged as I believe that past issues raised regarding local road issues have been ignored and avoided by Barratt Homes and their advisers and have not addressed the two local councils involved.

A lot of focus has already been made off the issues of additional road traffic from 200 new homes, despite the site having parking at most dwellings for more than one vehicle, somehow the transport consultant for Barratt Homes suggests 'only' 100 movements per day. This has to be an under estimate but when challenged was never addressed.

As a resident of Rowplatt Lane/Rowplatt Close I attended the webinar and submitted questions on 7th December and subsequently via separate email, but I like all the neighbours I have spoken to, have never received any response. My concerns are focused on the increase of traffic into Rowplatt Lane which will be the obvious route for residents of the proposed development who are heading west via the A264 towards M23 and Crawley and returning from that direction.

No mention of the issues of this road have been stated or seemingly considered. The focus has instead been on the Star Junction where A264 and A22 meet, at an already over congested junction, evidence of this has been uncovered recently - had you not already seen it live on any day. This calls into question the impartiality of the Barratt's own consultants.

If you look at a map of the area you will see that access to the A264 from Crawley Down Road to head west bound is inhibited by an acute angle to turn left, this causes traffic to often veer into on-coming traffic on the A264 when completing the turn. Instead it is my (our) opinion than the majority will exit the proposed development by turning left onto Crawley Down Road then right into Rowplatt Lane, at the end they would then be turning left onto A264 towards Crawley.

Rowplatt Lane is already deemed unsuitable for HGV vehicles with signage at the A264 junction to support this. This suggests to most the the Council and Highways Dept acknowledge that Rowplatt Lane is restricted in width.

The Lane width is between only 2.5 - 2.75 metres wide within the junction with the A264 and this already causes near misses due to turning vehicles. I estimate the max width to be no more than 3 meters at any point along the Lane but I would suggest this is investigated or substantiated by the planning committees. What is most obvious to those who live here is that there are always a significant number of cars parked on the Lane at all times which means traffic is always having to find a passing place to give way to on-coming cars, this is already restrictive but the additional traffic would make for much worse and no doubt cause incidents and congestion, as well as noise and issues for those residents trying to access Rowplatt Lane from side roads.

I have attached 2 photos caught randomly just this last week take during the middle of the day.

In simple terms - Rowplatt Lane is not wide enough, or suitable, to deal with any additional volume in 2 way traffic given the number of parked cars due to the limited number of drive ways in many of the houses.

There 'should' be no access for HGV vehicles to access or exit from the development - therefore the increased traffic attempting to enter Crawley Down Road directly from A264 will be a massive issue and cause issues ahead of the Star Junction, NOT therefore solved by some promises around developments with the Star Junction, which is further along the A264.

I along with many neighbours are objecting to the development until such times alternative access roads to the A264 are built and improvements made to prevent the creation of 'rat runs' leading to accidents in the surrounding residential roads.

I thank you for your consideration and ask that my views are understood as being specific to the Rowplatt Lane issue and not lost under development of A22 access.

Yours faithfully

Andrew Nicol

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2538

Site Allocations DPD: Main Modifications Response

Main Modification: MM2

ID: 25380

Response Ref: 2538/1/MM2

Respondent: Martyn Piddington

Organisation:

On Behalf Of:

[REDACTED]

From: Martyn Piddington [REDACTED]
Sent: 24 January 2022 01:48
To: Policy Consultation
Cc: [REDACTED]
Subject: Planning site ref SA20

Some people who received this message don't often get email from [REDACTED] [learn why this is important](#)

Dear Sir/Madam

I object to the proposed development at Gullege Farm, East Grinstead (SA20) on the basis that, not only will it cause a catastrophic loss of natural habitat and is counter productive to the needs of East Grinstead, but also the roads servicing East Grinstead are woefully inadequate to handle the present demands let alone the proposed increased loads. The development would impact negatively on the amenity of the grade II listed farmhouse 'Gullege Farmhouse' and Imberhorne Farm Cottages by completely overwhelming them.

This development lies outside of the East Grinstead and Felbridge built up boundaries and is in contravention of both the Neighbourhood and District plan policies. The proposed site allocation SA20 is outside the East Grinstead & Felbridge built-up boundaries and is therefore against Neighbourhood and District Plan policies [EG2, EG2a, DP12 & DP13]. The supporting text to policy EG2 (at paragraph 4.9) explicitly calls for development to be refused in the areas of countryside precisely in the location of the proposed site. Also I believe the council were negligent in their duty to provide a properly advertised consultation schedule, presumably in the hope that it can be approved without proper public scrutiny.

I am regularly inconvenienced whenever commuting through the area despite trying to limit the inconvenience by travelling at varying off peak times.

In support of my objection, I would like to present some relevant historical context.

Back in 2010, a development next to the one now being proposed on Imberhorne Farm for less than a fifth of the houses, was refused on the grounds of highways congestion. Since then, the Council's own housing figures show that a further 1,783 houses have been built in and around East Grinstead ...which has resulted in a big increase in traffic on our local roads. Even if the current proposals to allow a further 750 are disregarded, congestion is already set to become considerably worse once the 1,420 houses already in the pipeline are built.

I am informed that West Sussex Highways now support the Council's plan to build many more houses with no mitigation to road schemes at all. Which is curious as in 2011 an appeal inspector said when approving 'The Oaks' development that "There is a recognised problem of traffic congestion in East Grinstead which has been the subject of studies over the years and is accepted as a major constraint on future growth in and around the town. Locally, peak-hour congestion on the A22 leads to the use of Imberhorne Lane as a cut-through to the B2110 and as part of a rat-run through the Imberhorne Estate to the town centre. The lane has a 30mph speed limit which is regularly exceeded and it is used by commercial vehicles, including in connection with a waste recycling facility, as well as cars. The amount of traffic on the lane leads in turn to congestion on it and this, along with rat-running and traffic speeds can only be to the detriment of the safety of local residents and road users."

In 2017, Mid Sussex assessed potential housing sites as part of the District Plan examination. One of the assessed sites was Imberhorne Farm. At that time the site was REJECTED as unsuitable and the Council recommended that it shouldn't be allocated due to excessive levels of traffic congestion. Their report said ..."Severe traffic constraints within East Grinstead would limit the amount of strategic development within the town unless significant mitigation is proposed. The site's/major negatives relate to the severe transport constraints, which affect all sites in the East Grinstead area."

I believe the Council now say that there are NO severe transport constraints in East Grinstead and that NO traffic mitigation is necessary in order to accommodate further large scale housing in East Grinstead!!!

How the Council can hold such a contrary view whilst conditions have only worsened is inexplicable, unless something untoward is going on. Furthermore the fact that the Council holds a view that 750 additional homes at Imberhorne Farm and Felbridge will NOT have a severe impact on our local roads is patently ridiculous and why did the Council's own 2018 traffic study evidence have material omissions which would have undermined their Strategic Transport Study?

In early 2020 Mid Sussex commissioned a strategic transport model and used it as evidence to support proposed housing in East Grinstead. The model clearly showed that the main junctions at Felbridge, Imberhorne and Turners Hill will ALREADY have exceeded their theoretical capacity. Theoretical capacity is deemed to be 100% but it is widely acknowledged that significant congestion starts above 90%.

Even if NO additional houses are added to the 1,420 already in the pipeline, the 2020 model predicts that in the next 10 years the Turners Hill junction will reach 115% capacity, the Felbridge junction 108% and the Imberhorne junction 102%. These are the Council's own figures. But these figures almost certainly understate the future levels of congestion at these junctions.

The 2020 strategic transport study report acknowledges that it undertook very little traffic surveying and it doesn't say whether any surveying was undertaken at all in East Grinstead, so there was a reliance on general growth assumptions to extrapolate data taken from surveys carried out in 2008. The model based all its future projections on a baseline position assumed for 2017 and calculated that the Felbridge junction was only operating at 73% of its capacity and that an average of 3 cars were queuing at peak times. I regularly use this junction and never ever has there been only 3 vehicles waiting at peak.

This projection was shown to be flawed as evidenced by a detailed study of the Felbridge junction undertaken in 2018 by Tandridge Council which clearly showed that the junction was operating at 106% capacity with an average of 48 cars queuing at peak times. A 2019 planning appeal for 63 homes along the Crawley Down Road revealed evidence to the effect that traffic queuing eastbound on Cophorne Road towards the traffic lights built up at peak times and frequently reached as far back as Rowplatt Lane, about 1 km from the junction, and sometimes even further. This was observed during the site visit about 5.30 pm on 15 May and is corroborated by a video camera survey undertaken by the Council over the three-day period 17-19 July 2018.

The fact that Mid Sussex jointly commissioned the 2018 junction study is damning. They knew full well that more reliable traffic data existed that would undermine the traffic evidence they used to support more houses. However, the Council not only refused to publish the full details of the 2018 traffic survey ... but when challenged said that the more reliable study is not relevant! This is non-sensical, irrational and deeply troubling.

The national planning rules refer to road safety and congestion and say that ... "Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe"

Last year the Council commissioned a safety review of selected junctions that they decided were the most impacted by the site allocations. Strangely, the safety review did not include either of the congested junctions at Felbridge or Imberhorne... despite nearly half of the proposed housing being a short distance away and despite the high number of collisions recorded there. Official records show that the Felbridge junction saw a greater number of serious collisions than any of the junctions the Council reviewed!!

The Council haven't committed to any road or junction improvements, yet in this case the traffic impact of multiple housing sites should be required to be assessed together as one. However in its assessment the Council only take into account the relatively small number of houses they are currently proposing ... while ignoring the impact of housing sites that are in the pipeline. In other words the traffic from the many sites already approved but not completed is not assessed at all, even though it will soon be adding to the congestion.

The Council's own figures confirm the impact of JUST the houses in the pipeline will make are local junctions significantly over capacity in the near future. This approach is irrational and flawed ... the impact of new site allocations assessed on their own will be much less and allows the Council to add more and more houses to the pipeline without the impact ever becoming severe.

Perplexingly, the Council have not assessed the traffic impact of the latest housing on any of our local junctions as severe. Probably because West Sussex Highways have said "The A22/A264 Felbridge junction is already congested during peak hours. The Mid Sussex Transport Study indicates that although the DPD site allocations do not result in a severe impact, this is because the junction is already over-capacity in the reference case."

The reference case excludes the proposed houses but includes those in the pipeline up to April 2020. It is also worth noting that a significant number of houses have been added to the pipeline since April 2020 but these are not accounted for in the Council's traffic modelling. The Council are approving new homes all the time and since the examination in June have approved many more. The official record of planning approvals indicates that the residual need could now be reduced by a further 400 or so houses.

Therefore, if the Council revised its plan to reflect the current housing position rather than the situation that existed 9 months ago, the residual need might well fall to below 400! This would only represent the minimum number of houses the Council aims to provide but nevertheless, means that the proposed site in East Grinstead could be withdrawn from the plan while still leaving more than double the number of homes it needs.

There are too many anomalies, omissions and economies of truth in this development proposal to be put down to incompetence alone. I find the lack of transparency and absence of inconvenient data very troubling and suggest that, as the Council has failed to provide full transparency in support of their decision making process, then this development proposal process is fundamentally flawed and unsound and should be rejected as a consequence.

Thank you for your consideration and I look forward to your comments in due course.

Yours faithfully,

Martyn Piddington

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2539

Site Allocations DPD: Main Modifications Response

Main Modification: MM2

ID: 25390
Response Ref: 2539/1/MM2
Respondent: Keith Harding
Organisation:
On Behalf Of:

[REDACTED]

From: Keith Harding [REDACTED]
Sent: 24 January 2022 11:14
To: Policy Consultation; f.osborne@eastgrinstead.gov.uk
Subject: DPD Mainmodification Calculation

[You don't often get email from [REDACTED] Learn why this is important at <http://aka.ms/LearnAboutSenderIdentification>.]

I am writing to object that although 550 houses are being planned for Imberhorne Lane, there does not appear to be any requirement for road improvements regarding the already busy Felbridge junction.

I can also envisage that following the houses now being built by Linden Homes, Gardenwood Road will be increasingly busy as a rat run through to the A22.

I am surprised and disappointed that our local council has approved this, without assessing the road infrastructure of our town which already is congested at peak and even non peak times. I understand there is even a suggestion that a Bus lane would be added to the A22 London Road. How is that going to improve anything??

A beautiful part of our town is being destroyed should this building of houses be allowed.

Keith Harding [REDACTED]

2540

Site Allocations DPD: Main Modifications Response

Main Modification: MM2

ID: 25400
Response Ref: 2540/1/MM2
Respondent: Henry Williams
Organisation:
On Behalf Of:

[REDACTED]

From: Henry Williams [REDACTED]
Sent: 24 January 2022 11:14
To: Policy Consultation
Cc: SHIRLEY WILLIAMS
Subject: DPD Main Modifications Consultation

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Dear Sirs,

As a resident of [REDACTED] in East Grinstead I am very concerned about the huge impact of proposed new homes on the Imberhorne Estate.

Whilst I am sympathetic to the need for new housing, it is clear to all who live within the town that sufficient concern has not been applied to the impact on local services.

The Felbridge Junction is already in dire need of modernisation and upgrade with significant congestion a part of daily life. Local health and education facilities are already over burdened. Obtaining a GP appointment is very difficult indeed and many surgeries/dentists are not accepting new patients.

New homes are inevitable over time, but SIGNIFICANT resources need to be apportioned to upgrading local infrastructure. Why build for the sake of a housing quota, if the lives of the existing and new residents are significantly poorer than they were before?

Please look at these concerns and adequately address the impact to local infrastrucutre and services. At present it appears woefully short of required level of funding to allow for the town to continue to prosper.

Kind regards
Henry Williams

2541

Site Allocations DPD: Main Modifications Response

Main Modification: MM2

ID: 25410
Response Ref: 2541/1/MM2
Respondent: Ruth King
Organisation:
On Behalf Of:

[REDACTED]

From: Ruth King [REDACTED]
Sent: 24 January 2022 11:17
To: Policy Consultation
Subject: DPD Main Modification Consultation

You don't often get email from [REDACTED] [learn why this is important](#)

Dear whomever is in charge!

I am writing about the proposed new building on land adjacent to Imberhorne Lane in East Grinstead.

Does anyone on your planning committee actually live in or near Felbridge or East Grinstead? I can't believe anyone does. Otherwise you would know of the congestion at the junction between the A22 & the A264, and at the junction of the A22 and Imberhorne Lane.

It would be a nightmare for every driver concerned. Not to mention access to schools and Doctors.

Thank you for your attention

Mrs Ruth King

2542

Site Allocations DPD: Main Modifications Response

Main Modification: MM2

ID: 25420

Response Ref: 2542/1/MM2

Respondent: Bryan McClusky

Organisation:

On Behalf Of:

[REDACTED]

From: Bryan McClusky [REDACTED]
Sent: 24 January 2022 12:13
To: Policy Consultation
Subject: Proposed Housing development Imberhorne Farm

You don't often get email from [REDACTED] [Learn why this is important](#)

Dear Sirs ,

I wish to register my opposition to this development . This area is beautiful and enjoyed by lots of people and I am concerned that the concomitant strain on the local roads and services network and the increased hardstanding and associated water surface run off will cause real problems .

Yours faithfully Bryan James

McClusky

2545

Site Allocations DPD: Main Modifications Response

Main Modification: MM2

ID: 25450
Response Ref: 2545/1/MM2
Respondent: Damien Millns
Organisation:
On Behalf Of:

From: Damien Millns [REDACTED]
Sent: 24 January 2022 13:41
To: Policy Consultation
Subject: DPD Main Modifications Consultation

You don't often get email from [REDACTED]. [Learn why this is important](#)

To whom this may concern.

I have been advised that there is a proposal for hundreds of new properties to be built on the land owned by Imberhorne Farm. As a resident of the Imberhorne estate, I wanted to write to express my extreme opposition to such a development. I am sure that I am not the first, and will not be the last, to raise such massive concerns.

It is completely impractical whichever way you look at it. The area cannot cope with the level of traffic that this will produce and it is frankly going to cause chaos to an already busy commuter 'rat run' system. We saw the massive increase in traffic that was caused by the Oaks development all around our local roads and this would make things so much worse. It just seems completely unfeasible and will make a busy local road system so much worse.

But it is not just about the congestion and the road system. I have 2 school aged children at the local schools that have to run the gauntlet and cross these roads every day. What about their safety? Is this being factored in? And this is before we even consider the impact to the environment through more exhaust fumes as well as the beautiful habitat that will be destroyed to develop more expensive houses that don't really need to be built.

Ultimately, this proposed development is a completely unnecessary burden on the families, the existing infrastructure and the environment. I want to raise my vehement opposition to such a potentially calamitous proposal and I hope that you will consider my family, and many other Imberhorne residents, when making your decisions.

Yours sincerely,

Damien Millns

2549

Site Allocations DPD: Main Modifications Response

Main Modification: MM2

ID: 25490
Response Ref: 2549/1/MM2
Respondent: Oli Haydon
Organisation: Barton Willmore
On Behalf Of: Welbeck Strategic Land II LLP

From: Oli Haydon [REDACTED]
Sent: 24 January 2022 09:20
To: Policy Consultation
Subject: Site Allocations DPD - Main Modifications Consultation
Attachments: P9_33580_MM Response Statement_FINAL V2.pdf

Follow Up Flag: Follow up
Flag Status: Flagged

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Good morning,

Please find attached our representation to the above consultation. I'd appreciate if you could confirm receipt by reply.

Kind regards

Oli Haydon
Senior Planner



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WILLMORE**

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Mid Sussex District Council Site Allocations
Development Plan Document – Main
Modifications (Nov 21) Consultation

Land south and west of Imberhorne Upper
School, Imberhorne Lane, East Grinstead

On behalf of Welbeck Strategic Land II LLP

January 2022

Mid Sussex Site Allocations DPD – Main Modifications (Nov 21) Consultation

Land south and west of Imberhorne Upper School, Imberhorne Lane, East Grinstead

On behalf of Welbeck Strategic Land II LLP

Project Ref:	33580/A5/OH	
Status:	Draft	FINAL
Issue/Rev:	01	02
Date:	January 2022	January 2022
Prepared by:	Oli Haydon	Oli Haydon
Checked by:	Gareth Wilson	Gareth Wilson
Authorised by:	Gareth Wilson	Gareth Wilson

Ref: 33580/A5/OH

Date: January 2022

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APPENDICES

Appendix 1: Land at Imberhorne Lane, East Grinstead – Draft Allocation Plan

1.0 INTRODUCTION

- 1.1 These representations have been produced on behalf of the Welbeck Strategic Land II LLP (the 'Promoter') in response to the Mid Sussex Site Allocations DPD – Main Modifications (Nov 21) Consultation which runs from 29 November 2021 to 24 January 2022.
- 1.2 They relate solely to the Promoter's land interests for c. 65ha of Land south and west of Imberhorne Upper School, Imberhorne Lane, East Grinstead (the 'Site') as shown in **Appendix 1**. These representations address the proposed modifications to Policy SA20 (*Land South and West of Imberhorne Upper School, Imberhorne Lane, East Grinstead, for 550 dwellings*).

2.0 COMMENTS ON THE PROPOSED MAIN MODIFICATIONS TO THE MID SUSSEX 'SITE ALLOCATIONS DPD'

- 2.1 Mid Sussex is preparing a 'Site Allocations Development Plan Document' which will identify sufficient housing sites to provide a five-year housing land supply to 2031. The proposed allocation's accompanying wording within the DPD (ref SA20) is highly detailed in its objectives and recommendations for the site and provide a supported basis for the submission.
- 2.2 There are a number of minor modifications proposed to the allocation's description wording, highlighted below:

*Housing allocation with Local Centre and Care Community (C2), early years, ~~and~~ primary school **and facilities for Special Educational Needs (2FE)**, strategic SANG, public open space and children's equipped playspace, provision of land for playing fields associated with Imberhorne School.*

- 2.3 Under the 'Social and Community' section of SA20, it is proposed to include the following wording, '*Provision of a minimum of 142 dwellings (Use Class C2) in a dedicated site within the allocation, fronting onto Imberhorne Lane*'. The Inspector's reasoning for this addition is "in response to the fact that the submitted policy SA20 fails to indicate any quantitative provision for specialist housing for older people. The inclusion of a specific quantitative requirement for such development is justified and in accordance with national policy as expressed in paragraph 61 of the Framework". The proposed area for the older persons' dwellings aligns with the current iteration of the masterplan for the site.

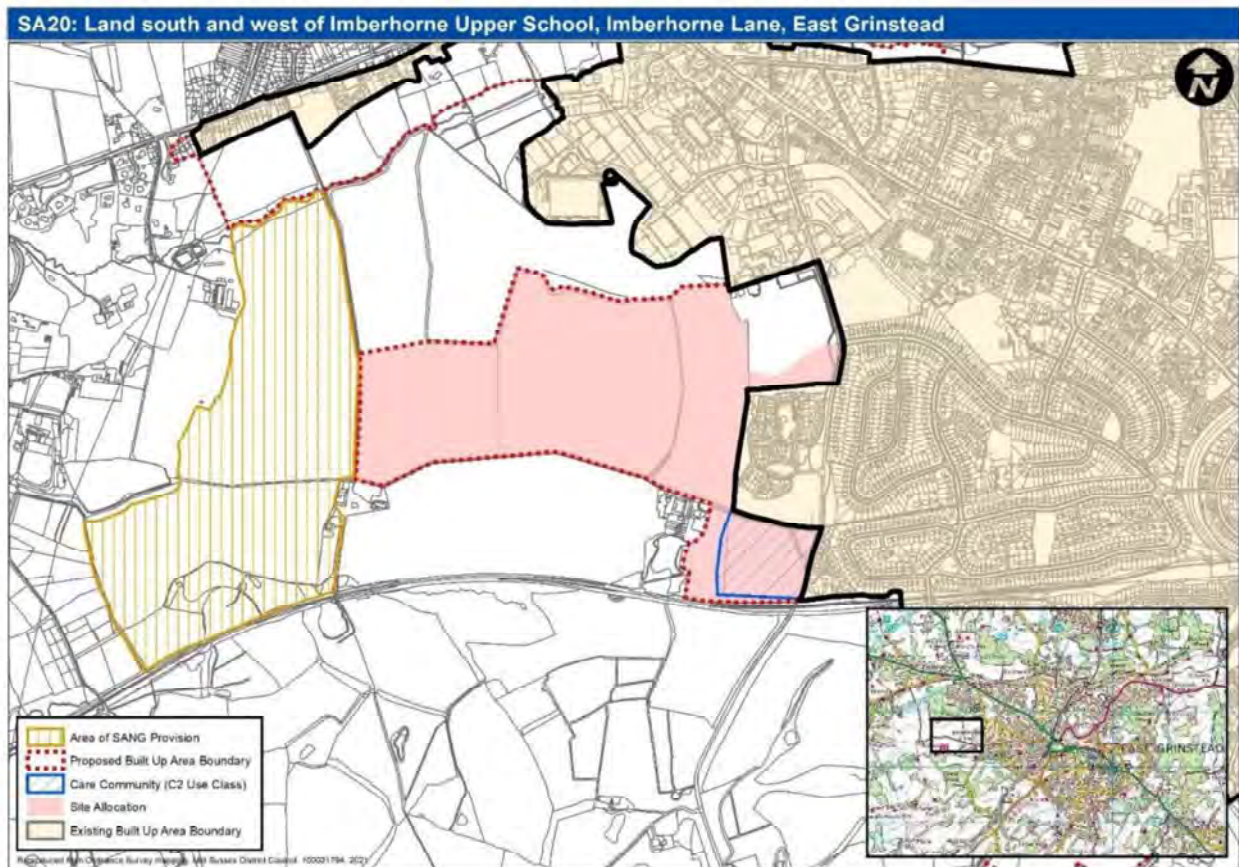
- 2.4 In terms of the 'Biodiversity and Green Infrastructure' element of SA20, it is proposed that *'the management of the SANG should include regular monitoring of visitor numbers, where visitors travel from to visit the SANG, activities at the SANG, and any suggestions for future management'*. A detailed SANG management scheme is to be prepared to accompany the application and we raise no concerns with this proposed modification.
- 2.5 The remaining amendments are minor in nature to which we have no comment.
- 2.6 We agree that there is no requirement for a re-appraisal of the sustainability of the site and that the appraisal at Submission stage (July 202) still holds.
- 2.7 We also agree that the proposed modifications have no implications for the 2020 Habitats Regulations Assessment (HRA) findings as the modification does not result in any changes to the proposed quantum or location of development.

3.0 SUMMARY AND CONCLUSIONS

- 3.1 These representations have been produced on behalf of Welbeck Strategic Land II LLP for Land south and west of Imberhorne Upper School, Imberhorne Lane, East Grinstead as shown in **Appendix 1**.
- 3.1 We have provided feedback on the relevant modifications to the Site Allocations DPD as proposed by the Inspector. We continue to agree with the Local Authority that the scheme will deliver a high quality and sustainable extension to East Grinstead which facilitates the expansion of Imberhorne Upper School.

APPENDIX 1

Land at Imberhorne Lane, East Grinstead – Draft Allocation Plan



2550

Site Allocations DPD: Main Modifications Response

Main Modification: MM2

ID: 25500

Response Ref: 2550/1/MM2

Respondent: Christopher Russell

Organisation:

On Behalf Of:

[Redacted]

From: [Redacted]
Sent: 24 January 2022 15:52
To: Policy Consultation
Subject: DPD Main Modifications Consultation

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Dear Sir,

I am writing to confirm my agreement and support for the comments made by Paul Tucker in his response to the consultation. My wife and I have lived in East Grinstead for forty five years. The traffic problems in this town have increased monumentally in those years and for the Council to state that this development will not increase the problem is deceitful nonsense. With the development at Hill Place Farm and other smaller developments, the existing traffic congestion in this attractive town will cause severe gridlock. I also understand that no proper efforts are to be made with regard to the infrastructure required. This development should not be allowed to take place and the Council are reneging from their responsibilities if permission on this scale is granted.

Yours faithfully,
Christopher Russell.

[Redacted]

2551

Site Allocations DPD: Main Modifications Response

Main Modification: MM2

ID: 25510
Response Ref: 2551/1/MM2
Respondent: Richard Jenkinson
Organisation:
On Behalf Of:

[REDACTED]

From: Richard Jenkinson [REDACTED]
Sent: 24 January 2022 16:00
To: Policy Consultation
Subject: DPD Main Modifications Consultation

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I'm writing to express deep concern over the plans for large-scale housing development at Imberhorne Farm, East Grinstead.

I am particularly concerned that the modifications to the plan do nothing to address the problems of traffic in the area.

Even without the proposed development, the London Road, towards East Grinstead and towards Felbridge, is regularly clogged with stationary or very slow moving traffic. And other local roads, e.g. Heathcote Drive, Halsford Park Road, etc., are already becoming dangerous due to their increased use as "rat runs." This area simply can't cope with any more traffic.

There's also the question of the loss of valuable amenity land and important environmental space; again, the plans and modifications simply fail to address any of the issues raised.

Yours faithfully

RICHARD JENKINSON
[REDACTED]

2552

Site Allocations DPD: Main Modifications Response

Main Modification: MM2

ID: 25520
Response Ref: 2552/1/MM2
Respondent: Sarajane Ferris
Organisation:
On Behalf Of:

[REDACTED]

From: Sara Ferris [REDACTED]
Sent: 24 January 2022 16:07
To: Policy Consultation
Subject: Planning Reference: SA20

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Dear Sir / madam

I am writing to express my objections in reference for the site is SA20 for the following reasons:

Firstly It is in close proximity to a historic building (Gullege) and will negatively impact on the rural area spoiling our much needed countryside and farm land. It is a cherished area of natural beauty and a place for locals to walk and escape the hussle and bussle.

East Grinstead is already far too big in my opinion and the roads are heavily congested, this development will add to the local pollution levels. The local wildlife will be affected by the noise and also light pollution. It will spoil the views of our beloved North Downs. Please leave this area alone or consider other more viable options if essential.

Yours faithfully

Sarajane Ferris

2558

Site Allocations DPD: Main Modifications Response

Main Modification: MM2

ID: 25580

Response Ref: 2558/1/MM2

Respondent: Alice Waddicor

Organisation:

On Behalf Of:

[REDACTED]

From: Alice Waddicor [REDACTED]
Sent: 24 January 2022 23:50
To: Policy Consultation
Subject: DPD Main Modifications Consultation

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Site reference SA20 and SA19

FAO Mike Fox

Dear Mr Fox

I would like to object to the proposal for 750 new homes in East Grinstead on Imberhorne Farm. I am concerned about the loss of farmland, and the impact on local roads and communities where doctors, dentists and schools are already under strain.

Many thanks

Alice

2559

Site Allocations DPD: Main Modifications Response

Main Modification: MM2

ID: 25590

Response Ref: 2559/1/MM2

Respondent: Malcolm Parker

Organisation:

On Behalf Of:

[REDACTED]

From: [REDACTED]
Sent: 24 January 2022 22:37
To: Policy Consultation
Subject: DPD main modification consultation

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Dear Sir

I find it very peculiar how certain issues regarding the current restraints and serious issues of any development within the area of the proposed MSDC site allocations SA20 & SA19 were not more thoroughly scrutinised. The sheer volume of traffic is increasingly affecting quality of life around the proposed development area of SA20 & SA19.

Traffic travelling North on Imberhorne lane is backed up from the A22 London road Junction to the entrance to the Oaks development on Imberhorne lane in peak times, moving between a standstill and walking pace, outside of the current Covid restrictions & advice.

The Mid Sussex District Council Air quality annual status report shows (MSAQ29) London road, East Grinstead continues to have the poorest air quality from vehicle NO2 emissions in Mid Sussex! Although a little further up the road from the London Road/Imberhorne lane Junction, it is the same road experiencing similar levels of vehicle traffic. With the addition of the SA20 development and resulting vehicular traffic this would only drastically increase the NO2 levels and the adverse health affects associated.

The SA20 proposed sangs is quite some distance from the current built up boundary of Imberhorne lane East Grinstead. Most local people walk along the public footpath to take in the peace and tranquility of the rural landscape and the varied flora and fauna along the way, for their health and wellbeing as far as Gullage, before turning back. With the new sangs proposal one would have to walk that same distance through the proposed development before they even got to this new sangs area to truly enjoy the peace and quiet of the rural surroundings as mentioned above. With this in mind it makes sense to the ordinary person that most people might find this too far to walk and so choose to drive in their vehicle and if using their vehicle, they might just as easily decide to drive the short distance to Ashdown forest adversely affecting this already fragile environment from the number of visitors.

Kind regards

Malcolm Parker
[REDACTED]

2560

Site Allocations DPD: Main Modifications Response

Main Modification: MM2

ID: 25600
Response Ref: 2560/1/MM2
Respondent: Lisa Scott-Conte
Organisation:
On Behalf Of:

[REDACTED]

From: Lisa Scott [REDACTED]
Sent: 24 January 2022 21:14
To: Policy Consultation
Subject: Site reference SA20 and SA19

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I object most strongly to this application.

Highways: Introducing safe and adequate walking and cycling infrastructure at this location is unfeasible due to the narrow country lanes. Avvedd on foot and by bike is primary in all planning applications. Way back in 2010, a development next to the one now being proposed on Imberhorne Farm for less than a fifth of the houses, was refused on the grounds of highways congestion. Congestion has increased, therefore I see no reason how this application could be approved.

This application is not per need adn is in the wrong location. There are sufficient brown field sites to meet our housing needs therefore building on green fields is unnecessary.

Kind Regards,
Lisa Scott-Conte
[REDACTED]

2561

Site Allocations DPD: Main Modifications Response

Main Modification: MM2

ID: 25610

Response Ref: 2561/1/MM2

Respondent: Vanessa Vine

Organisation:

On Behalf Of:

From: Vanessa [REDACTED]
Sent: 24 January 2022 20:18
To: Policy Consultation
Subject: FAO Mike Fox, Re: Main Modifications to DPD site Allocation. MM22.

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Dear Mr. Fox,

Re: Main Modifications to DPD site Allocation. MM22.

The proposal to build housing estates on this precious combination of productive agricultural land and open greenfield countryside is utterly indefensible.

We are in a time of food import chaos, dreadful economic uncertainty, critical biodiversity loss, and a mental health crisis.

We must protect and preserve our farmland, our wildlife, and our soul-saving views to the North Downs.

Local Government must surely work to protect and build wildlife corridors, not further to destroy them.

This plan surely contravenes the planning policies in place to protect the Ashdown Forest from excess incoming traffic and footfall.

The necessary road and utility infrastructure is woefully lacking and would become dangerously oversubscribed.

There are already 1000+ houses being built locally, with empty houses all over the country, and reportedly 20,000 in London alone, with the population of the UK predicted to start falling within 3 years.

As a local resident who frequently visits Imberhorne Farm to enjoy the green space and wildlife, I formally request that you refuse this illogical, destructive and very worrying application.

Many thanks.

Yours sincerely,

Vanessa Vine,
[REDACTED]

2562

Site Allocations DPD: Main Modifications Response

Main Modification: MM2

ID: 25620
Response Ref: 2562/1/MM2
Respondent: Mims Davies MP
Organisation: Member of Parliament for Mid Sussex
On Behalf Of: Mims Davies MP

[REDACTED]

From: DAVIES, Sarah B [REDACTED]
Sent: 24 January 2022 20:02
To: Policy Consultation
Cc: [REDACTED]
Subject: Mims Davies MP - submission to Main Modifications for Site Allocations DPD - SA19 & SA20

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Good Evening

Please accept this submission on behalf of Mims Davies MP, Member of Parliament for Mid Sussex:

I write on behalf of numerous constituents who have approached me regarding sites SA19 'Land South of Crawley Down Road' for 200 units & SA20 'Land South and West of Imberhorne Upper School' for 550 units, both in East Grinstead. They have highlighted their significant concerns about the impact of the additional vehicles that will be generated by these developments on the already extremely congested local road network.

I recognise that as part of the planning process there is the need for the developer to mitigate where possible the impact, however my constituents seek reassurance that as part of the approval of these sites that due consideration has been given to fully addressing these concerns and that improvements to the road network will occur based on current levels of usage.

With kind regards

Sarah

Sarah Davies (Mrs)
Chief of Staff & Office Manager for Mims Davies MP



Office of Mims Davies MP
Member of Parliament for Mid Sussex
House of Commons, London, SW1A 0AA | [REDACTED]
[REDACTED]

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For the Government website's COVID-19 page click here: <https://www.gov.uk/coronavirus>

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2564

Site Allocations DPD: Main Modifications Response

Main Modification: MM2

ID: 25640

Response Ref: 2564/1/MM2

Respondent: Denise Letchford

Organisation:

On Behalf Of:

[REDACTED]

From: denise letchford [REDACTED]
Sent: 24 January 2022 17:13
To: Policy Consultation
Subject: DPD Main Modifications Consultation - Extra housing in Felbridge area

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I live in Crawley Down and hate to think of how many hours I've spent in traffic at Felbridge waiting to join the already crowded A22. The thought of another 700 houses adding to this without any planned traffic relief is too depressing to contemplate. Surely East Grinstead is providing more than its fair share of new housing with Manor Farm and various small developments in the vicinity.

Please think again before allowing such huge development.

Denise Letchford