

Representations to Mid Sussex District Plan 2021 - 2039 SHELAA Site Selection Review

Brook House Farm, East Grinstead

Prepared for
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1. INTRODUCTION

- 1.1. This document comprises Representations submitted for, and on behalf of, L.C. Hobbs & Son Ltd, in respect of the ongoing Examination of the Submission Draft (Regulation 19) Mid Sussex District Plan 2021 - 2039 (the 'Submission Draft Plan'). It is submitted in response to the Local Planning Authority's (LPA) decision, as advocated by the Local Plan Inspector, to 'test' a higher housing requirement than that set out in the Submission Draft Plan, and the potential to allocate additional sites for housing-led development.
- 1.2. The LPA have published a Post Hearings - Site Selection Methodology Review¹ that details the process that will be followed by the LPA in undertaking the re-appraisal of candidate development sites. It states that this will include those sites that were previously promoted and assessed in the 2024 Strategic Housing and Economic Land Availability Assessment (SHELAA) but were not proposed for allocation in the Submission Draft Plan, together with any new sites submitted to the LPA as part of the review.
- 1.3. These Representations relate to a land parcel that was assessed as part of the 2024 SHELAA, under the site address 'Land at Brook House Farm, Turners Hill Road, East Grinstead' and was assessed under Site Reference ID 1024.
- 1.4. It is submitted that the site is developable and deliverable² for residential-led development and having regard to the Submission Draft Plan's Spatial Strategy, it should be allocated for development to help meet the higher housing target identified by the Local Plan Inspector.
- 1.5. It is considered that the site would be suitable to deliver circa 45 dwellings within the Plan period.
- 1.6. These representations comprise a brief description of the site and its setting, a summary of the previous consideration and conclusions of its suitability for housing development as contained in the 2024 SHELAA, an overview of a prospective layout and quantum of development, and an assessment of the suitability of the site for allocation for residential development having regard to both the Spatial Strategy of the Submission Draft Plan, and the constraints and opportunities of the site.

2. SITE AND SURROUNDINGS

- 2.1. Brook House Farm is located on the south-west edge of East Grinstead.
- 2.2. It is accessed from the south-east side of Turners Hill Road (B2110), approximately 60m from the junction of this road at a roundabout with West Hill, Brooklands Way and Hurst Farm Road.
- 2.3. These roads provide access to the East Grinstead railway station and the town centre.
- 2.4. The parcel of land that is the subject of this Representation extends to some 2.24 hectares.

¹ Document Reference MS-12

² as defined in the Glossary at Annex 2 of the NPPF

- 2.5. It is bordered to the north by Turners Hill Road; to the east by properties that front Hurst Farm Road; to the south by agricultural land; and to the west and northwest by the curtilage of properties that front Turners Hill Road,.
- 2.6. The site is accessed via a hard-surfaced track that leads south-east, from Turners Hill Road and then turns south, to serve the residential dwelling of Brook House Farm and the adjacent farm buildings and surrounding land.
- 2.7. Brook House Farm, comprises a detached 2-storey dwelling. The farm buildings a shortway to the south are of mixed age and form, but predominantly comprise modern buildings that are externally faced in profile sheeting.
- 2.8. These buildings are surrounded to all sides by agricultural grassland.
- 2.9. The topography of the site generally falls in a south-west to north-easterly direction, with the low point delineated by a watercourse that runs along the rear gardens of properties on the south-west side of Hurst Farm Road.
- 2.10. The site boundaries are predominantly delineated by indigenous hedgelines, which include a number of semi-mature and mature trees. There are also a number of mature trees toward the western part of the site, where this adjoin residential properties.
- 2.11. There is a Public Right of Way (PRoW) a short way to the northeast of the site which runs from Turners Hill Road in a broadly south-easterly direction along the rear curtilage of properties fronting Hurst Farm Road.

3. 2024 STRATEGIC HOUSING AND ECONOMIC LAND AVAILABILITY ASSESSMENT

- 3.1. The Submission Draft Plan was supported by a range of background and evidence papers. This included the District Plan Review Site Selection Methodology, dated October 2023.
- 3.2. This set out the methodology followed by the LPA in developing a short list of potential housing sites that was subsequently used in the determination of which sites to allocate for development within the Plan.
- 3.3. The Paper set out that Stage 1 of the process was the identification of potential sites for development, predominantly comprising those put forward by promoters in response to a 'Call for Sites'.
- 3.4. It noted that a total of 260 sites were then appraised by the LPA as part of the SHELAA. This, Stage 2, comprised individual site assessments via a 3-step process.
- 3.5. Step 2A comprised an assessment of the relationship of the proposed sites to the existing settlement boundaries. Sites that were disconnected from existing settlements and/ or were of a size which meant they could not provide significant on-site facilities/ services (and so not likely to represent sustainable development), were rejected from further assessment.

- 3.6. This assessment was based on proximity of the sites to the defined built-up area boundary; physical separation of the site from the built-up area boundary by features such as ancient woodland or watercourses; and the ability to safely access the site on foot via existing footpaths to the nearest settlement.
- 3.7. Step 2B comprised an assessment of 'showstoppers'. This considered environmental constraints and deliverability issues. Sites with the greatest constraints (or where a significant proportion of the site was affected) were excluded from further assessment.
- 3.8. Step 2C comprised an 'overall assessment'. The sites not rejected at stage 2A and 2B were subject to assessment against 14 criteria that considered environmental constraints, deliverability, and accessibility.
- 3.9. Each criterion was graded using a traffic light system ranging from 'very positive' impact (green), to 'very negative' impact (red).
- 3.10. Following this approach, land located south of the PRoW of the site (Site Reference ID 1067) was rejected at stage 2A on the basis that it was not connected to the built-up area boundary of East Grinstead and would represent unsustainable development.
- 3.11. Land to the north of the PRoW (Site Reference 1060) progressed through stage 2A.
- 3.12. At Stage 2B, it was concluded that development of the site (estimated to be 45 dwellings on the 2.24 hectare site) would represent 'Major Development' in the High Weald National Landscape.
- 3.13. It was considered that this represented a 'showstopper' and thus was not progressed for further assessment.
- 3.14. The Stage 2C, assessment comprised a 14 point assessment criteria was comprised of Part 1- Planning Constraints (Criterion 1 - 7); Part 2 - Deliverability Considerations (Criterion 8 and 9); and Part 3 - Sustainability/ Access to Services (Criterion 10 - 14).
- 3.15. Notwithstanding the decision not to progress the site at Stage 2B the 2024 SHELAA provides an assessment of the site against each of these criterion. This concluded as follows:
 - (1) Landscape - Very Negative- Major development in the AONB with no identified exceptional circumstances.
 - (2) Flood Risk - Very Positive - The site lies entirely within Flood Zone 1, the area of lowest fluvial flood risk.
 - (3) Trees - Neutral - The site is adjacent to an area of ancient woodland or within a 15m buffer from an area of ancient woodland. Development of the site may result in some harm, but mitigation can be achieved.
 - (4) Biodiversity - Very Positive - Site not within or adjacent to designated site.
 - (5) Listed Buildings - Very Positive - No listed buildings on/ near the site - no impact.

- (6) Conservation Areas - Very Positive - There are no Conservation Areas within/ close to the site. No impact.
- (7) Archaeology - Very positive - No impact on archaeological assets.
- (8) Availability - Positive - The site is available for development within five years. No house builder on board.
- (9) Access - Positive - Site access exists and minor improvements are required to provide a suitable and safe site approach.
- (10) Public Transport - Positive - Bus service - Excellent. Train Service - Good. Access to public transport and/or frequency of public transport in this location is good.
- (11) Main Service Centre - Positive - Within 15 minutes walk/ 20 minutes public transport.
- (12) Primary school - Positive - Within 15 minutes walk.
- (13) Health - Positive - Within minutes walk.
- (14) Retail - Very Positive - Within 10 minutes walk.

3.16. As detailed above, the site was not selected for allocation within the Submission Draft Local Plan.

4. PROSPECTIVE LAYOUT AND QUANTUM OF DEVELOPMENT

- 4.1. The site proposed for development under these Representations extends to some 2.24 hectares.
- 4.2. All existing built form on the site (ie the dwelling and agricultural buildings) would be demolished.
- 4.3. It is proposed that the existing access onto Turners Hill Road be retained in its existing location. It would be upgraded to comprise a 5.5m wide carriageway with a 2.0m footway on both sides of the carriageway to connect to the existing footway that runs along the southern edge of Turners Hill Road. Visibility splays would be provided in accordance with DMRB CD123 parameters for both the vehicle access and the footway.
- 4.4. It is envisaged that residential development would be comprised of a mix of dwelling units form and size. They would be predominantly 2-storey, and comply with the requirements of Policy DPH7 (Housing Mix) of the Submission Draft Plan.
- 4.5. The scheme would include affordable housing to accord with the requirements of Policy DPH8 of the Submission Draft Plan, comprising 30% on-site affordable housing. The tenure mix would be 25% First Homes and 75% social or affordable rented.
- 4.6. All hedgerows and trees around the periphery of the site would be retained, and enhanced. In particular the removal of the buildings would enable the strengthening of the boundary planting along the southern edge of the site, to create a continuous, hedge and tree line to the boundary with undeveloped land to the south.

- 4.7. Built form would be sited and orientated to protect the residential amenity of existing residential properties that adjoin the site, together with the 4 residential properties recently approved to be constructed on land adjoining the site to the north east (Land Rear of 43 Hurst Road, East Grinstead; Local Planning Authority Reference DM/23/3244).
- 4.8. Land for requisite Biodiversity Net Gain would be located to the south of the development that also falls within the ownership of L.C. Hobbs & Son Ltd.

5. SUITABILITY FOR ALLOCATION FOR RESIDENTIAL DEVELOPMENT

- 5.1. The Submission Draft Plan sets out that the 2018 District Plan Spatial Strategy focussed development towards the 3 main towns of the district (Burgess Hill, East Grinstead and Haywards Heath) and encouraged proportionate growth at other settlements to meet local needs and support the provision of local services. It noted this Spatial Strategy informed the location of allocations within the 2018 District Plan and subsequent Site Allocations DPD.
- 5.2. It sets out that the District Plan Review process has sought to determine whether the existing strategy is still relevant, given any changes to evidence or local circumstance, and whether the strategy can be maintained given the extended Plan period, future predicted needs, and availability of sites. It states that the findings of the Evidence Base has indicated that beyond existing commitments, there is limited growth potential at East Grinstead, Haywards Heath and AONB settlements.
- 5.3. In light of this, it states that further growth identified within the Submission Draft Plan is in accordance with a revised District Plan Spatial Strategy based on four key principles. These are:
 - Protection of the High Weald Area of Outstanding Natural Beauty (now High Weald National Landscape);
 - Making effective use of land (meaning the maximising of opportunities to re-use brownfield sites);
 - Growth at existing sustainable settlements where it continues to be sustainable to do so;
 - Opportunities for extensions to improve sustainability of existing settlements.
- 5.4. These principles are expressed and applied in a 'cascade' approach.
- 5.5. In respect of the third limb, the Submission Draft Plan states that promoting growth at existing sustainable settlements meets the Plan's Strategic Objectives by ensuring development can be directed away from protected landscapes within the District towards locations which can benefit from existing infrastructure and services. It notes that growth at these locations can contribute towards improved and/ or new facilities to the benefit of all the community.
- 5.6. The Plan notes that increased population can also provide additional support for local businesses and town village centres through increased patronage and staffing. The sustainable expansion of an existing settlement can help provide the critical mass to support viable sustainable travel solutions

and improved active travel connectivity for all the community, reducing the need to travel by car and reducing the district's carbon footprint.

- 5.7. The Plan states that it is becoming more challenging to deliver future growth in accordance with this strategy, and that this limits capacity for further sustainable development at some settlements.
- 5.8. It notes there are a number of significant constraints which need to be taken into account when assessing whether future growth is compliant with this element of the strategy. It notes that the availability of sites which continue to be capable of accommodating sustainable growth has become much more limited, particularly at East Grinstead and Haywards Heath and larger villages.
- 5.9. The Spatial Strategy is supported by a Settlement Hierarchy, which the Submission Draft Plan notes has been developed to identify 5 categories of settlement within Mid Sussex District. It notes that this is based on an assessment of the facilities, characteristics, and functional relationships of settlements with their surrounding areas.
- 5.10. Category 1 settlements are 'Towns'. These are noted as settlements with a comprehensive range of employment, retail, health, education, leisure services, and facilities. These settlements also benefit from relatively good public transport provision and are intended to act as a main service centre for the smaller settlements.
- 5.11. The Submission Draft Plan notes that within the District of Mid Sussex, there are three settlements which fall within Category 1 of the Settlement Hierarchy. These are Burgess Hill, East Grinstead, and Haywards Heath.
- 5.12. The Submission Draft Plan contains allocations that envisage the development of a further 1708 dwellings within Burgess Hill; a further 45 dwellings in East Grinstead, and a further 226 in Haywards Heath.
- 5.13. The allocation of additional residential development at East Grinstead is contained to a single site allocation (Policy DPA4). This is located within the High Weald National Landscape.
- 5.14. In undertaking the Examination of the Submission Draft Plan, the Inspector has identified the requirement for the LPA to test a higher housing requirement than is set out in the Plan.
- 5.15. The requirement for this predominantly arises as a result of the requirement for Mid Sussex District to seek to make a more significant contribution to meeting the unmet housing needs of the adjoining authority of Crawley Borough.
- 5.16. In undertaking this testing of the higher housing requirement, the Inspector has identified the importance of assessing the merit of sites having regard to the Spatial Strategy and in particular, the potential for delivery of additional development in the form of sustainable extensions to existing settlements.
- 5.17. The Inspector noted that the Plan envisaged a relatively modest quantum of development over the remaining plan period in East Grinstead and Haywards Heath, even though these are 2 of the 3 most sustainable settlements within the district, and where the Spatial Strategy emphasises growth should be directed where possible.

- 5.18. In undertaking the test of higher housing growth, and re-appraisal of candidate sites, the Inspector has emphasised the need for regard to 'positive planning', and for the LPA to have regard to prospective mitigation measures that may address concerns raised with sites that led to their omission from allocation in the Submission Draft Plan.
- 5.19. In this respect, and as an example of the application of such an approach, the Inspector noted that there may be sites immediately adjoining the settlement edge of Tier 1 settlements, that have been discounted on the basis of landscape impact, as they lie within the National Landscape, but which are not unduly prominent and could be mitigated by high quality design and associated landscaping.
- 5.20. The need and reasons for undertaking a reappraisal of housing sites, and the observations of the Local Plan Inspector all indicate that the re-appraisal by the LPA should give particular consideration to the potential for allocating additional land for residential development in and around East Grinstead.
- 5.21. The original assessment of, land at Brook House Farm (Site Reference ID 1024), scored the site as either 'neutral', 'positive' or 'very positive' in 13 of the 14 criterion. The 1 criterion, comprising impact to landscape, the site assessment scored this as 'very negative'.
- 5.22. An appraisal of the proposed development of the site as now submitted for development under these Representations, against the 14 criteria is detailed below.

Landscape

- 5.23. The site is located within the High Weald National Landscape. Within this are, the northern boundary of the National Landscape is contained to the south of, and is delineated by, Turners Hill Road, whilst the eastern boundary is delineated by the eastern edge of the site.
- 5.24. The recent residential development approved adjoining the eastern boundary of the site is located on land that is immediately outside of the National Landscape designation.
- 5.25. The designation of land falling within the High Weald National Landscape includes land up to the edge of the built-up area boundary of much of the southern and eastern edge of, of East Grinstead. The northern edge of the town delineates the edge of the jurisdiction of Mid-Sussex District. As a result of this, there is relatively little land that adjoins the town within Mid-Sussex District that is unfettered by National Landscape designation. This is limited to the western edge of the settlement, immediately to the north of Brook House Farm.
- 5.26. In consideration of the merits of land comprising Site Reference ID 1024, the landscape impact of, of the prospective development was considered to be 'very negative'.
- 5.27. It was stated that, that the scheme would represent 'major development' within the National Landscape with no identified exceptional circumstances.
- 5.28. The Submission Draft Plan notes that the evidence base underpinning decisions on the extent and location of housing growth in the National Landscape includes 2 Background Papers comprising

Assessment of the Impact of the SHELAA sites on the High Weald AONB; and Major Development in the High Weald AONB.

- 5.29. In respect of the former, the assessment of the land at Brook House Farm states that:\
- “There are three ponds adjacent to the site. There are no sandstone outcrops on or adjacent to the site, but there is underlying sandstone geology in the west of the site. The site is separated from the built-up area of East Grinstead, but is opposite a new development on Turners Hill Road, which is a historic lane. Development would represent encroachment into the countryside and would extend the settlement into the AONB. There is no ancient woodland within or in close proximity to the site, but there are mature trees within the site and on its boundaries. The site is not identified as a historic field system. Opportunities to protect tranquility and dark skies should be taken.”*
- 5.30. The associated appraisal notes that for major development sites within the High Weald National Landscape, the assessment applied 3 tiers comprising ‘not likely to be major development’ (Green); ‘may potentially be regarded as major development’ (Yellow);, and ‘likely to be major development’ (Amber).
- 5.31. In relation to land at Brook House Farm, it was considered that development of the site ‘may potentially be regarded as major development’.
- 5.32. Within the Submission Draft Plan, land off West Hoathly Road, East Grinstead, that lies within the High Weald National Landscape, is allocated for development for 45 dwellings (Policy DPA4). The Assessment of the Impact of the SHELAA sites on the High Weald AONB, concludes that such an allocation would not represent major development and would be appropriate.
- 5.33. In reaching this conclusion, the appraisal noted that the site would represent an increase of 0.28% in the built-up area of East Grinstead and an increase of 0.34% in the number of dwellings. It was considered that whilst the scale of the site is relatively small compared to the site of size of East Grinstead, it is located in an area of low-density development, and so the proposed yield of the site may be out of character with its immediate surroundings.
- 5.34. In concluding the assessment, it was determined the site would not represent major development on the basis that:
- “The proposed site allocation is reasonably well located to the settlement of East Grinstead and relatively small in scale. Whilst the site does not appear to directly impact on the AONB character components, there is likely to be loss of the medieval field system and potential impact on the ghyll woodland. Development would represent encroachment into the countryside. However, careful design of its layout and materials along with an appropriate defensible boundary may help to mitigate the impact.”*
- 5.35. Having regard to this analysis, it is considered that development of a comparable number of dwellings of a similar size site at Brook House Farm should also be concluded to not represent major development within the National Landscape.
- 5.36. The site is well related to the settlement edge of East Grinstead, being located directly south of large-scale residential development recently constructed, and immediately adjacent to existing

residential development and that recently approved in December 2025. There is also adjoining residential development to the west.

- 5.37. The site is well contained in relation to the wider National Landscape area. There is an existing hedgeline along the southern boundary of the site, which would be strengthened and enhanced as a result of the development through the removal of existing agricultural buildings along this edge. This would create a clear delineation between the site and the wider National Landscape, with the development site clearly visually connected to the existing built up area. The site would represent a logical infill development being bordered to the north, east and west by existing built form, and separated from undeveloped land to the south.
- 5.38. The LPA's previous assessment of the site noted that the development site contains comparatively modest components that comprise the natural beauty of the High Weald National Landscape. Of those that exist, the majority would be unaffected by the development.
- 5.39. For these reasons, it is considered that the landscape effective of the development, notwithstanding its location within the High Weald National Landscape, would be 'neutral'.

Flood Risk

- 5.40. The site lies entirely within Flood Zone 1. This represents land with the lowest probability of flooding, defined as having less than a 1 in 1000 annual probability of river or sea flooding. It is considered the safest category of land for development in flood risk terms.
- 5.41. In consideration of the merits of land comprising Site Reference ID 1024, the flood risk of the prospective development was considered to be 'very positive'.
- 5.42. There are no change in circumstances in relation to this issue, and it is therefore considered that the overall flood risk of the prospective development should continue to be 'very positive'.

Trees

- 5.43. There are a number of trees along the boundaries of the site.
- 5.44. All these existing mature trees would be retained in conjunction with the prospective development.
- 5.45. In conjunction with the development, it is proposed that additional and mitigatory tree planting would be undertaken, in particular along the southern boundary in lieu of the existing buildings which are to be removed
- 5.46. In consideration of the merits of land comprising Site Reference ID 1024, the tree impact of the prospective development was considered to be 'neutral'.
- 5.47. In light of the retention of existing trees and proposed additional planting, it is considered that the overall tree impact of the prospective development would be 'positive'.

Biodiversity

- 5.48. As detailed above, there are a number of trees along the boundaries of the site. The land generally comprises grassland together with the residential dwelling and curtilage of Brook House Farm and the complex of predominantly modern agricultural buildings.
- 5.49. The site is not within or adjacent to any site designated for its biodiversity interest.
- 5.50. In conjunction with the development, it is proposed that additional tree planting be delivered along the southern boundary, and it is proposed that land to the south would be used to deliver requisite Biodiversity Net Gain in conjunction with development of the site.
- 5.51. In consideration of the merits of land comprising Site Reference ID 1024, the biodiversity impact of the prospective development was considered to be 'very positive'.
- 5.52. In light of the above, it is considered that the overall biodiversity impact of the proposed development would continue to be 'very positive'.

Listed Buildings

- 5.53. The site does not contain nor is in close proximity to any listed buildings.
- 5.54. In consideration of the merits of land comprising Site Reference ID 1024, the Conservation Area impact of the prospective development was considered to be 'very positive'.
- 5.55. Given the absence of any material change in this issue, it is considered that the Conservation Area impact of the prospective development would continue to be 'very positive'.

Conservation Areas

- 5.56. There are no Conservation Areas within or close to the site.
- 5.57. In consideration of the merits of land comprising Site Reference ID 1024, the Conservation Area impact of the prospective development was considered to be 'very positive'.
- 5.58. Given the absence of any material change in this issue, it is considered that the Conservation Area impact of the prospective development would continue to be 'very positive'.

Archaeology

- 5.59. The site is not located within an area identified as having any archaeological potential.
- 5.60. In consideration of the merits of land comprising Site Reference ID 1024, the Archaeology impact of the prospective development was considered to be 'very positive'.
- 5.61. Given the absence of any material change in this issue, it is considered that the Conservation Area impact of the prospective development would continue to be 'very positive'.

Availability

- 5.62. These representations are prepared for, and submitted on behalf of, L.C. Hobbs & Son Limited. They are the sole freehold owners of all of the land promoted under this Representation.
- 5.63. In consideration of the merits of land comprising Site Reference ID 1024, the availability of the prospective development was considered to be 'positive'.
- 5.64. Given the absence of any material change in this issue, it is considered that the availability of the prospective development would continue to be 'very positive'.

Access

- 5.65. AThere is an existing vehicular access into the site off Turners Hill Road. This is located a short way to the south of the roundabout junction of this road with Brooklands Way, West Hill and Hurst Farm Road.
- 5.66. The proposed development would be delivered in conjunction with the retention and upgrade of the existing access.
- 5.67. This would be enhanced to a 5.5m wide carriageway with a 2.0m footway on both sides to connect to the existing footway that runs along the southern edge of Turners Hill Road.
- 5.68. Visibility splays would be provided in accordance with requisite standards.
- 5.69. In consideration of the merits of land comprising Site Reference ID 1024, the access issues of the prospective development were considered to be positive.
- 5.70. It was noted that a site access exists and that minor improvements would be required to ensure it provided a suitable and safe site approach.
- 5.71. Given the absence of any material change in this issue, it is considered that the access issue to the prospective development would continue to be 'positive'.

Access To Public Transport

- 5.72. The nearest bus stops to the site are located on Brooklands Way. This is a short walk. Bus service No.84 runs between Crawley and East Grinstead, while bus service No.81 provides an hourly service between Lingfield and Crawley via East Grinstead.
- 5.73. East Grinstead railway station is located 800m to the north of the site. This represents a 10 minute walk. The station provides regular services into London Bridge and London Victoria.
- 5.74. In consideration of the merits of land comprising Site Reference ID 1024, the public transport accessibility from the site was considered to be 'excellent' for bus service and 'good' for train service. The public transport accessibility to the site was overall considered to be 'positive'.
- 5.75. Given the absence of any material change in this issue, it is considered that the accessibility of the site to public transport remains 'very positive'.

Access To Main Service Centre

- 5.76. The site is located some 800m from East Grinstead town centre via a walking route along Turners Hill Road and then West Hill, (with pedestrian crossings on all roundabout arms), to provide access to local services and facilities as well as the East Grinstead railway station.
- 5.77. The accessibility on foot along footways to East Grinstead town centre would take some 10 minutes.
- 5.78. In consideration of the merits of land comprising Site Reference ID 1024, it was considered that the site was accessible within a 15 minute walk or 20 minutes by public transport to the main service centre of East Grinstead. As a result of this, the accessibility effect of the development was considered to be 'positive'.
- 5.79. Given the absence of any material change in this issue, it is considered that the accessibility of the site to public transport remains 'positive'.

Access To Primary School

- 5.80. The nearest primary school to the site is the Meads Primary School, Mill Way, East Grinstead, RH19 4DD.
- 5.81. This can be accessed via footways along Turners Hill Road, and subsequently along Farm Road and Southlands. The walking route to this primary school is some 1.1km It can therefore be accessed on foot in some 14 minutes.
- 5.82. In consideration of the merits of land comprising Site Reference ID 1024, the accessibility to a primary school was considered to be 'positive'.
- 5.83. Given the absence of any material change in this issue, it is considered that the accessibility of the site to public transport remains 'positive'.

Access To Health Facilities

- 5.84. The nearest health facility to this site is Ship Street Surgery, Ship Street, East Grinstead, RH19 4EE.
- 5.85. This can be accessed via footways along Turners Hill Road, and subsequently along West Hill (with pedestrian crossings on all roundabout arms) and West View Gardens to Ship Street. The walking route to this health facility is some 1.1km. It can therefore be accessed on foot in some 14 minutes.
- 5.86. In consideration of the merits of land comprising Site Reference ID 1024, the accessibility to health facilities was considered to be 'positive.'
- 5.87. Given the absence of any material change in this issue, it is considered that the accessibility of the site to public transport remains 'positive'.

Access To Retail Facilities

- 5.88. There are a range of retail facilities within proximity of the site. These are predominantly in and around the town centre of East Grinstead, and include Sainsbury's, Waitrose and Partners, Iceland, Boots, and the Queen's Walk Shopping Parade. A number of these are accessible within a 10 minute walk.
- 5.89. These facilities can be accessed via footways along Turners Hill Road and then via West Hill (with pedestrian crossings on all roundabout arms).
- 5.90. In consideration of the merits of land comprising Site Reference ID 1024, it was considered that the accessibility to retail facilities would be within a 10 minute walk and the accessibility to retail facilities was therefore considered to be 'very positive'.
- 5.91. Given the absence of any material change in this issue, it is considered that the accessibility of the site to public transport remains 'very positive'.

6. SUMMARY AND CONCLUSIONS

- 6.1. These representations are submitted in response to the LPA's re-appraisal of candidate housing sites as, as part of a testing of a higher housing figure to be facilitate for delivery in the emerging District Plan.
- 6.2. This is being undertaken at the direction of the Local Plan Inspector, as part of the ongoing Examination into the Submission Draft Plan.
- 6.3. The LPA have indicated that they will undertake a re-appraisal of known candidate sites, submitted to the 2024 SHELAA, together with any new additional sites.
- 6.4. These representations relate to a site previously assessed under Site Reference ID 1024, which was previously assessed but discounted on the basis of the landscape impact of the scheme, given its siting within the High Weald National Landscape
- 6.5. The site extends to some 2.24 hectares, and it is considered would be suitable for the development of circa 45 dwellings. The site is located adjoining the built-up area boundary of East Grinstead, where the adopted and emerging Spatial Strategy seeks to focus significant development, having regard to the categorisation of the town as a Tier 1 Settlement. It thus provides a comprehensive range of employment, retail, health, education, leisure services and facilities, and which benefits from relatively good public transport provision to other centres.
- 6.6. Whilst the site is located within the High Weald National Landscape, relatively little land adjoining the settlement edge of East Grinstead, that lies within the jurisdiction of Mid-Sussex District Council, is unfettered by such designation.
- 6.7. The Inspector that is Examining the Submission Draft Plan has made clear that it may be necessary in the interests of positive planning, for the LPA to release land in and around the edge of Tier 1 settlements like East Grinstead, even where this is designated as High Weald National Landscape, in order to deliver development where it is locationally highly sustainable and complies with the Spatial Strategy.

- 6.8. The Inspector also noted, that there may be such locationally sustainable sites that whilst within the High Weald National Landscape, are not particularly representative of the wider landscape designation, and by virtue of their setting, could be developed without adversely impacting the wider landscape character of the area.
- 6.9. Given the setting of Brook House Farm, surrounded on 3 sides by existing (and approved) built form, and its relative visual separation from the wider National Landscape designation, it is considered that it could be developed without undue harm to landscape character.
- 6.10. This conclusion is reinforced by the view of the LPA in relation to a comparably sized parcel of land, a short way to the south, that that has been identified as suitable for allocation in the Submission Draft Plan, (Policy DPA4), and been deemed to not represent 'major development' within the National Landscape.
- 6.11. The site is at the lowest risk of flooding, and it is considered development could be delivered without undue impact on trees and biodiversity.
- 6.12. The site can be developed without adverse impact on any listed buildings, Conservation Areas or archaeology.
- 6.13. The site is available for development within the plan period.
- 6.14. The development would be delivered with an upgraded access that would meet requisite highway standard requirements. The site connects to a good footway network that provides ready access to the facilities in East Grinstead.
- 6.15. The site has good access to public transport, including bus service and train service. It is also accessible to East Grinstead town centre (which contains a range of retail facilities), primary school and health facilities via walking routes in 10-15 minutes.
- 6.16. Overall, the site represents an excellent opportunity to deliver requisite additional development in the district in a location that supports the spatial strategy aspiration to focus development within and around Tier 1 Settlements.
- 6.17. As a result of the revised development proposals, it is considered that the impact assessment of the site against the 14 criterion in the 2024 SHELAA should now be all considered to have either a neutral or positive impact.
- 6.18. The site represents a suitable and sustainable opportunity to contribute to the additional housing need that is being tested for delivery by the LPA as part of the ongoing examination of the Submission Draft Plan. The site is available and deliverable. It should therefore be allocated for development for residential development of some 45 dwellings within the emerging Mid Sussex District Plan Review.