

MID-SUSSEX DISTRICT PLAN (2021-2039 INQUIRY)

Submission to Planning Inspector, Ms Louise Nurser BA(Hons) DipUP MRTPI

Dear Ms Nurser,

Strategic Objections

As a former strategic planner with the Department of the Environment, particularly on the *'Strategy for the South East'* (Fig.1), may I draw your attention to that Strategic Plan? It set out a long term strategy which established two Growth Areas in this District; Crawley-Gatwick and Burgess Hill. These were based on;

- a) a general agreement amongst London & South East Councils that **rural areas should be free from development** and act as buffers between large urban areas like East Grinstead and Crawley;
- b) a survey of **spare capacity** showing maximum value in investment in land, roads, water, gas, electricity and other infrastructure (Fig.2);
- c) a study showing the **optimum size** of towns to minimize *per capita* costs of infrastructure. (50-100,000 people – (Fig.3));
- d) a need to **preserve agricultural land for food self-sufficiency**.

These goals have not changed since the 1970's. They have grown more important as pressure for growth in population and resistance to it in rural areas both continue to rise in the over-heated South East. The Plan does not meet the needs to save the rural character of the District; it allows minor developments which, in the absence of a spare capacity survey add disproportionate costs to infrastructure and it allows valuable agricultural land to be built on which makes it unsustainable in food supplies.

A principal purpose of planning is to provide surety to long-term investment in business and major infrastructure to secure economies of scale and commercial viability. It is also to avoid exploitation of cheap public assets like rural farm-land and green spaces. leaving public and private providers of infrastructure to meet their demands.

Traditional Labour Party aims: The previous Government's aim to 'level-up' the nation is consistent with traditional Labour Party aims, requiring diversion of growth from the South East to more needy Regions in the North. Such broad national and economic goals tend to be over-looked by local planners driven by short-sighted Councils and political Parties pre-occupied by immediate, short-term issues.

The District Plan suffers from those pressures and thus fails the 'positively prepared' criterion. The above goals are being further threatened by the new Government and so must be rigorously defended by the planning profession.

Spare capacity: A vital pre-planning exercise is to establish where there is spare capacity for development. It does not appear that such a survey has been carried out by MSDC.

New Towns: Government policy is to build New Towns where economies of scale minimize public and private expenditure, which are between 50, 000 to 100,000 population (Fig.2) and where services can be provided in advance, economic ventures set up and redundant land used. It would therefore only be 'consistent with National policy' if growth were accommodated in a New Town, in a Region in need of growth.

Local Objections

Huntsland Farm: A gross example of the erosion of the above principles is the disproportionately large housing proposal of c.400 homes west of Crawley Down, a village of only 2,000 homes. This will a) destroy the rural character of the village; b) erode the 'strategic gap' between large urban areas; c) require new investment in infrastructure; d) ignore spare capacity in the planned Growth Area; and e) concrete over vital agricultural land. This project should be struck out. The housing requirement set by Government, apart from local need, should be diverted to areas or Regions which need new investment and want to regenerate 'brown-field' sites.

Part of this scheme is on a steep slope likely to flood the land downhill to the west and overwhelm the stream, unless a costly pumping station is installed to raise water and sewage up 30m to the sewerage and surface water mains on Turners Hill Road which are failing and already require extensive refurbishment.

Great Crested Newts have been found in the pool at the foot of the hill, as confirmed by an eDNA Technical Report by Cellmark (3). The stream beyond already floods after heavy rain from Wallage Lane and the culvert beside Worth Way. Floods will be exacerbated by impervious surfaces in the development. This will make many existing houses uninsurable, causing structural damage including to the grand old Rowfant House. The developer has outlined the extent of the flooding area.

Precedents: Allowing this scale of development paves the way for other non-rural activities such as Rowfant Business Centre which includes metal recycling, a sawmill and other industries generating heavy vehicular traffic which is unsuitable for Wallage Lane which is fragile, narrow, unpaved, unlit, twisting and labelled as 'single track'. The latest example is a proposed Olympic-scale Climbing Centre which will generate unacceptable volumes of extra traffic from all over the south of the country. No traffic survey or prediction has been revealed.

Conclusion

Residents of Rowfant appeal to you to uphold our concerns in your judgment on the Plan, on planning processes or lack of them, and on the local imposition of disproportionate development.

We suggest the optimum solution for the Government's policies to promote growth and allow freer rein to developers, as well as reducing pressure on the country-side and minimizing public expenditure, is their policy to plan New Towns. These should preferably be sited on post-industrial land in Regions starved of investment and employment.

Dr James B Thring, *BArch, MCD, PhD*
Chair, The Rowfant Society 07483 219729

[Rowfant comprises about 100 hereditaments between the M23 and Crawley Down]
September 2024

References:

- (1) South East Joint Planning Team '*Strategy for the South East: 1976 Review*' HMSO.
- (2) Graph showing minimum per capita costs of land and infrastructure (Thring, J (1980) '*Costs of New Town Development*' Dept. Environment (Fig.3)
- (3) Kales, M (2024) '*Cellmark eDNA Technical Report*' showing evidence of Great Crested Newts in the site (P2) at Crawley Down.

Fig.1 '*Strategy for the South East*'

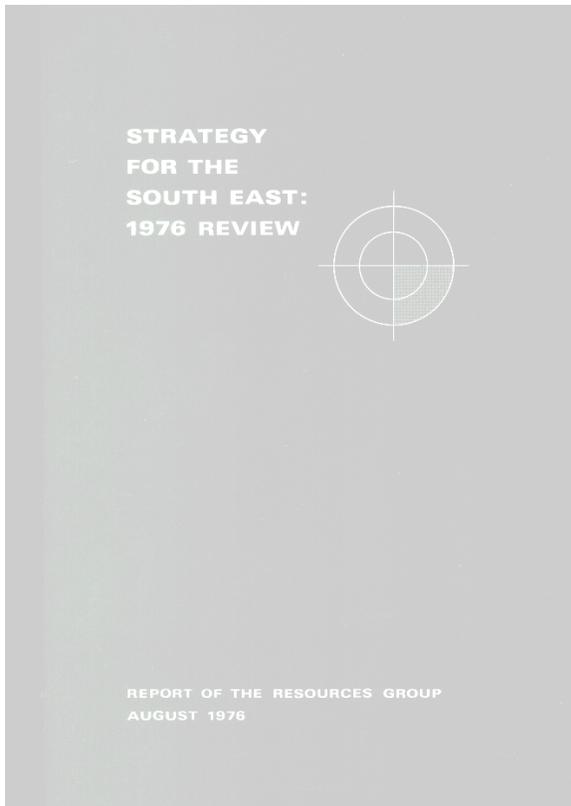


Fig.2 'Spare Capacity' Annex of S.E. Strategy

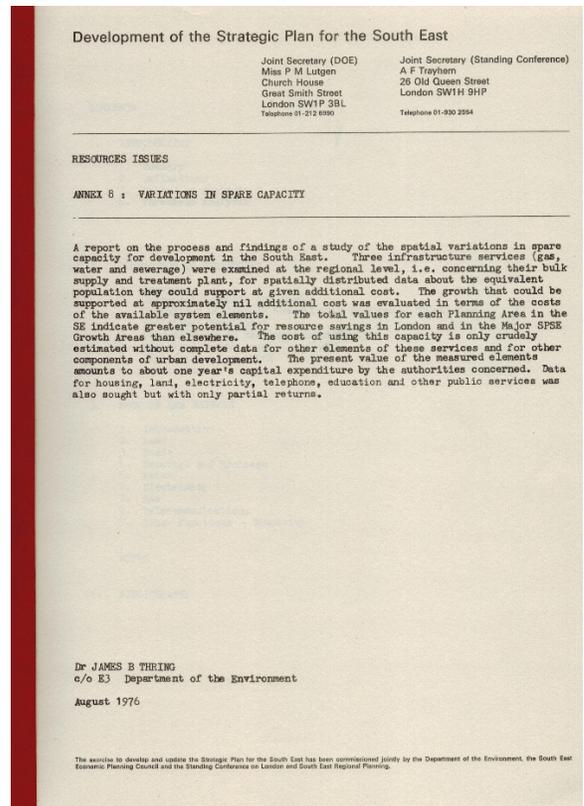
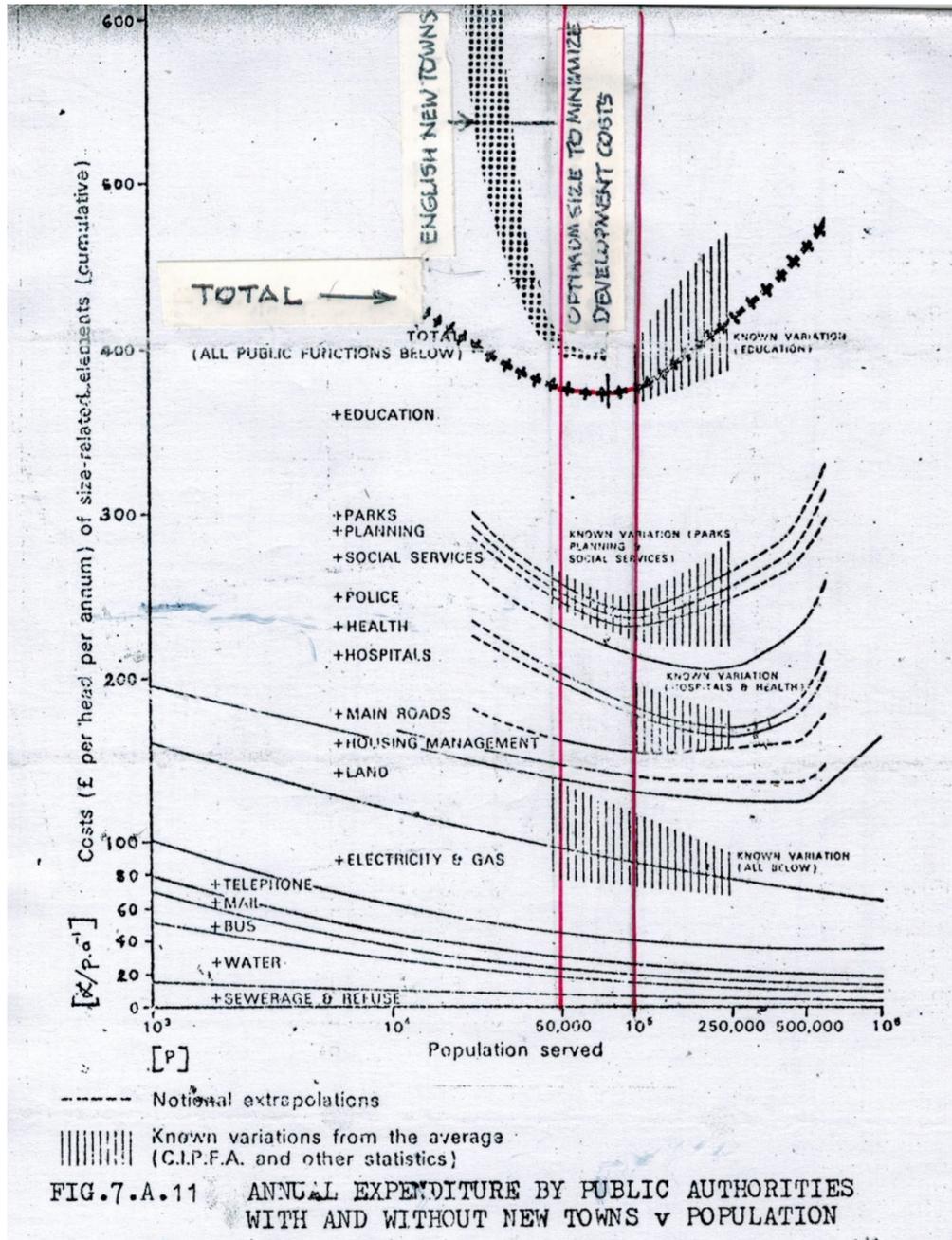


Fig.3 Optimum size of development for minimum *per capita* costs of land & infrastructure



Source; Thring, J. (1980) 'Costs of New Town Development' Dept. Environment.