



EAST GRINSTEAD TOWN COUNCIL

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Comments on the Inspectors Main Modifications

MM28 DPH1 Housing Local Housing Need of 19,243 increased to Housing Requirement of 24,071

Spatial Strategy

"The spatial strategy of this Plan is to focus growth at locations that support the sustainability of existing settlements. This will be achieved through sustainable growth at existing settlements and for urban extensions that improve sustainability of existing settlements. Some smaller settlements, that are not currently sustainable, have the potential to accommodate high levels of growth, supported by improvements to infrastructure."

The Council's experience is that urban extensions are not supported by the appropriate infrastructure improvements and result in reduced sustainability of the existing settlement/community. The Plan has failed to achieve an appropriate balance of new housing allocations between strategic developments that will require entirely new infrastructure and extensions to existing communities that rely on existing infrastructure and local services.

Contributing to the unmet need of Brighton and Hove

Mid Sussex is a partner in the Northern West Sussex Housing Market Area (NWSHMA) with Crawley and Horsham and should contribute to unmet need in the Market Area. Mid Sussex does not have an equivalent commitment to contribute to the unmet need of Brighton and Hove. Horsham has not been asked to make a similar contribution through an increase in its Housing Requirement.

Given that the Inspector accepts that a 'strategic response' is needed to address the unmet need of Brighton and Hove, it is not justified to increase the Mid Sussex Housing Requirement by 1,075 (or any number) in advance of the development and agreement of that 'strategic response'.

The Housing Requirement in **MM28** should therefore be reduced to 22,996 (24,071 minus 1,075) and the least sustainable additional sites (according the assessments in the Sustainability Appraisal Main Modifications Report) should be deleted.

Draft Tandridge District Plan

The highways assessment in MS-TP5: In-Combination Testing – Conclusions identifies a number of significant impacts on the A264 corridor between East Grinstead and Crawley and the immediate local road network. The Council is concerned that the In-Combination Testing has not included the proposals in the draft Tandridge District Plan for over 1,700 new homes on the North boundary of Copthorne/Felbridge and along the A264 corridor (see figure).

Comments on the Inspectors Main Modifications



Together, the proposed site allocations by Mid Sussex and Tandridge will see over 5,000 new homes in the green gap between East Grinstead and Crawley. WPC believes that the cumulative effect of this level of development needs significantly more analysis in order to identify the infrastructure needs.

Windfall

An Appeal against the refusal of permission for a 1,500 development between Cuckfield and Ansty has been Called-In by the Secretary of State (SoS). If approved by the SoS, the 1,500 homes would be considered to be a windfall contribution to the housing requirement, even though it is twice the agreed figure for windfall 759. The Plan process should be paused until the SoS's decision is known and, if approved, the site should be added to the draft Plan as a strategic allocation¹, and the least sustainable additional sites (according the assessments in the Sustainability Appraisal Main Modifications Report) should be deleted.

Water Supply and Housing Growth

The District Plan should not make provision for further significant housing growth until a robust and deliverable strategy is in place to address the region's water supply deficit. South East Water has confirmed that Sussex will not have sufficient water to supply existing customers in a dry year from 2030 without intervention, while its current water resources planning assumptions do not reflect the higher housing growth now required through the Government's standard method.

Mid Sussex is particularly exposed, with the latest housing requirement of 1,246 homes per year exceeding the 706 homes per year assumed in the water company's forecasts. It would therefore be irresponsible to continue approving substantial new development on the assumption that water infrastructure will simply catch up. Housing growth should be paused until there is clear evidence that sufficient water resources, infrastructure and funding are secured to meet both existing demand and the additional demand created by new development.

¹ The site was included as a strategic allocation in an earlier draft plan, see <https://midsussex.moderngov.co.uk/documents/s11252/APPENDIX%201%20District%20Plan%202038%20SCH%20P.pdf> page 90.

Highway Capacity – A22/A264 Star Junction, Felbridge

The capacity of the A22/A264 Star junction at Felbridge must be given significantly greater weight in determining the level and location of future development within the District Plan. This junction has been recognised as a serious highway constraint for many years and, despite repeated transport studies and assessments identifying capacity and congestion problems, there has been no meaningful progress towards delivering a long-term solution.

The continued failure over approximately the last 15 years to address this known infrastructure constraint represents a significant concern, particularly given the involvement and responsibilities of multiple authorities, including Mid Sussex District Council, Tandridge District Council, West Sussex County Council and Surrey County Council.

The junction is already a major constraint on movement into and out of East Grinstead and further development within Mid Sussex will place additional pressure upon it. Of particular concern is the cumulative impact of development on both sides of the county boundary, including potential substantial development on the former horse showground land opposite Felbridge Primary School in Surrey, which would generate additional traffic using the same already-constrained network.

The District Plan should therefore not simply acknowledge the capacity problems at the Star junction and assume that future mitigation will address them. Before further significant housing growth is allocated in and around East Grinstead, there must be a clear, funded and deliverable cross-boundary solution, supported by all relevant highway and planning authorities. After many years in which the problem has been repeatedly identified but not resolved, reliance upon further future studies or unidentified mitigation measures would not provide sufficient confidence that the additional development proposed can be accommodated sustainably.