

DM/23/0810 Land South of Crawley Down Road, Felbridge

Felbridge Parish Council (FPC) strongly objects to this application. Whilst it is accepted that development of this site has been agreed in principle by the adoption of DPD Policy SA19 following the examination in public, Felbridge Parish Council does not believe that the development proposal as submitted meets the criteria necessary for the application to be considered viable.

HIGHWAYS AND TRANSPORT

Felbridge Parish Council does not recognise the latest modelling of the Star Junction presented in that it has only provided revised traffic counts. There are no published turning counts or observed queue length studies. As such, it is impossible to validate if the model correctly predicts the queues and average delay times experienced by residents. Only once the model has been shown to be capable of replicating the current observed conditions at this junction is it reasonable to use the model to predict the future state. This is fundamental as Surrey Highways have already declared this junction "severe".

FPC believe a thorough current state traffic study is necessary to support this development, particularly as the latest Transport Statement from the application shows the junction to be at 101% utilisation. The Tandridge traffic study, used as the basis for their emerging District Plan which showed this junction already operating at 106% in 2018 with a MMQ (mean maximum queue length) of 48 cars, indicates a worse situation.

The junction severity was also evidenced by the Inspector for APP/M3645/W/18/3198090 who included in his decision (Para 34) data that demonstrates that the queue length of eastbound traffic on the A264 increases by 168 vehicles in the 2-hour period 4:15pm to 6:15pm. The throughput of the junction in the PM peak averages 719 vehicles per hour, thus the Inspector is recording that the junction was already operating at 112% of its capacity based upon 2018 traffic data. Since then, 120 additional dwellings have been approved within 500m of this junction.

This latest Transport Assessment also fails to model the Crawley Down Road (CDR)/A264 junction against a current traffic survey, instead it states that it has replicated the '15 Crawley Down Road' [TA/2017/1290] modelling which was based upon 2018 surveys and is therefore five years out of date. Whilst it has reportedly been updated to reflect 2023 observed traffic flows, there is no queue length study and we do not recognise the modelling presented as the baseline for the CDR/A264 junction which states that there is effectively no queue with it 'unloading every cycle'. During the peak hours (and well outside them) the queue on the eastbound A264 reaches back to Crawley Down Road (and regularly back to Rowplatt Lane), as such the opportunity to turn east out of CDR is about having a gap in the westbound lane at exactly the same time as the queue is not moving in the eastbound lane as the hatched box at this junction only clears when the eastbound traffic stops moving and the next queuing vehicle has complied with the hatching. Contrary to the Transport Assessment, there is always a queue at the end of CDR and the current delays at this junction are the only thing that prevents Rowplatt Lane & CDR being a rat run to avoid the queue on the A264. The model is therefore inappropriate.

Felbridge Parish Council is still concerned about the poor Eastern sightline at 123 Crawley Down Road. The requirement for speed calming put forward by Surrey Highways would have to demonstrate significant compliance with the 30mph limit for the sightline to be satisfactory.

Felbridge Parish Council fully supports the East Grinstead Town Council amendment to the East Grinstead Neighbourhood plan that requires Mid Sussex District Council to issue a Grampian precedent condition for SA19 & 20. Should any future planning consent be granted for either or both of these allocated sites, then Mid Sussex District Council guarantee that Section 106/278 legal agreements will be executed prior to consent. This includes an upgrading of the A22/A264 'Star' road junction to provide full mitigation for the existing over capacity of this junction; mitigation to negate the increased capacity caused by the proposed extra 775 dwellings; plus the additional accommodation for 120+ residents of the Retirement Community on the SA20 site. The relocation of Imberhorne Lower School from Windmill Lane in East Grinstead to the site, along with the addition of a two-form entry primary school will also increase vehicle movements for the site. This work is to be completed prior to the first housing occupations of either site mentioned above.

The Transport Assessment for this proposal has incorporated the Atkins proposal of 2-lanes turning south at the Felbridge junction within their baseline model 'as this is a committed improvement project'. Surrey Highways has now determined that this improvement 'will not and cannot be implemented'. This failed improvement scheme had been cited as the mitigation for the Hill Place Farm (200 units) and was relied upon for the future state transport modelling for 17 Cophorne Rd (26 units), 11a Crawley Down Rd (32 units), 15-39 Crawley Down Rd (63 units), 61 Crawley Down Rd (20 units) - a total of 339 units. Thus, these committed and mainly completed developments now have no highways mitigation to counter their impact upon this severe junction. Until mitigation of the impact of these 339 units upon an already severe junction has been delivered, it is impossible to see how an additional 200 units can be considered and the cumulative impact of the resulting 539 units without any mitigation would be 'severe' contrary to the NPPF.

The baseline used for the Transport Assessment does not use the same approach that SCC required for the initial 63 unit scheme at 15 Crawley Down Road (TA/2017/1290). For that scheme, the Transport Assessment was based on a June 2019 traffic survey. The 2019 baseline measured traffic level was then revised to include all subsequent local approved developments and completed developments to properly reflect baseline traffic levels. The revised baseline must then be adjusted using TEMPRO to uplift the revised baseline at the development completion date and the current development traffic added to properly assess the cumulative impact of all relevant developments. This data should then be used to model the future state scenarios with and without development. The latest TA has identified the large local schemes but has failed to include the cumulative smaller local commitments or the very significant SA20 site of 550 dwellings plus the Retirement Community that is part of that proposal.

Inspector's Minor Amendment to SA19 & SA20 Felbridge Parish Council draws attention to Surrey County Council's agreement to undertake a study with West Sussex County Council to determine what junction mitigation can be implemented to alleviate the A22/A264 corridor issues both now (in light of cumulative development locally), and in the future state with the additional DPD sites and normal traffic growth. The agreement quotes "Working collaboratively with and to the satisfaction of both Surrey and West Sussex County Council Highway Authorities, mitigate development impacts by maximising sustainable transport enhancements; where additional impacts remain, highway mitigation measures will be considered". The new study (which SCC and WSCC commissioned) has not started yet, let alone been concluded and as such SCC will not be able to say whether (or how) the Star junction could be mitigated to below its current 'severe' state. Felbridge Parish Council contends that until the joint WSCC and SCC transport study has been concluded and suitable and deliverable mitigation of the current severe junctions has been agreed, it is inappropriate to approve this application as the Highways elements of the adopted DPD policy SA19 cannot be delivered.

DESIGN

We find a number of failings in relation to compliance with the MSDC Design Guide regarding the following principles.

Principle DG9 (Page 51): Reduce Reliance on the Private Car: There is an inadequate bus service in Felbridge with few services at evenings and weekends. There is a lack of local facilities, for example no doctor or dentist; supermarket; leisure centre; restaurants; rail service or safe footpath option. The village is served by one single intake primary school that is already oversubscribed before all the 121 dwellings already approved on MSDC land off or near Crawley Down Road have been constructed or occupied. There is reference in the application to a safe cycle route using the Gullege Bridleway and Worth Way to reach East Grinstead. However, the bridleway surface is unsuitable for cycles (or wheelchairs/pushchairs), it regularly floods and has no lighting.

Principle DG11 (Page 52): Respond to the Existing Townscape. "New development should generally reflect the scale of adjacent areas and the settlement context within which it is located to deliver a coherent and consistent urban fabric".

Felbridge Parish Council strongly object to the Planning Statement

4.2 The proposed development seeks to deliver a sympathetic extension to Felbridge.

This proposal does not provide a sympathetic extension to Felbridge. The housing density of the west parcel at 40dph greatly exceeds the existing density immediately north of the site, which is 16dph. It is also greater than the 30dph of the eastern parcel despite being nearer the development edge and the rural edge. This does not conform to the MSDC design guide principles DG11, DG16 & DG34.

This principle (DG11) requires this site to have a comparable density and style of housing to the neighbouring areas, whereas this application is for a considerably higher density with properties that are totally different in scale or design. The proposed western parcel comprises 2-storey, 2.5-storey and 3-storey dwellings whereas the abutting dwellings in Felbridge on the north boundary of the site are a mixture of single storey and 2-storey houses, with nearly one third being single storey. Therefore the solely 2-storey and higher development immediately south of them is inappropriate. We are also concerned about the visual impact as there is very little drop in height between the existing single storey dwellings on Crawley Down Road and the site of the proposed 3-storey dwellings, thus there are likely to be visible above the existing street scene.

Principle DG16 (Page 63): Create a Positive Development Edge. “Development should nevertheless be sensitively designed so that it avoids imposing upon the rural edge and existing roads that are characterised by their hedgerows and tree belt. This may require additional boundary planting. At the rural edge lower density development will also normally be necessary.” This requirement has not been met in the site plan as presented, which has a significantly higher density at the rural edge, than the surrounding area.

Principle DG34 (Page 87): Managing Increased Density in Urban Extensions. “A range of densities, building types and forms will normally be required with higher density development in the more accessible locations and lower density development in the peripheral areas.” This proposal has its highest density in the parcel furthest from the urban centre of East Grinstead and on the periphery of the built-up area boundary adjacent to the rural area beyond.

BIODIVERSITY/SUSTAINABILITY

The developer has failed to address biodiversity net gain and to effectively plan for the future. The Sustainability statement gives little comfort or commitment on any methods that will be included onsite. Given the phasing out of gas boilers in new homes from 2025 and the stated completion date for this development being 2026, there needs to be an alternative heating approach proposed for these dwellings. An air source heat pump solution (or other sustainable energy solution) for all properties would be preferable and is becoming common on other housing schemes of a similar size. There is no mention of commitment to photo-voltaic or solar hot water and this should be clarified. There is no commitment in terms of a payment or length of the Biodiversity Action Plan and we would ask for a period of a minimum of 10 years to be added as a condition should the Council be minded to approve the application. Given the rural nature of the site, consideration should be given to sustainable green features including green screens and rainwater gardens.

Play Area

Felbridge Parish Council suggests a different consideration for teenagers and urges the developer and the Council to look at initiatives such as ‘Make Space for Girls’ especially given the proximity to Imberhorne School.

Affordable Homes

It is noted that the application shows 30% of dwellings would be affordable homes. However, in the consultation feedback for the pre-application, East Grinstead Town Council suggested that the percentage of affordable homes delivered on greenfield sites in Mid Sussex should be 40%.

Flood Risk

Felbridge Parish Council challenges the suggestion that there is virtually no flood risk zone within the site. Residents who walk these fields, and the adjoining bridleway, know there is regular flooding in this area extending to both sides of the Gullege Bridleway. Photographs of recent flood events on the bridleway and the bridleway being closed as it was swept away during recent flooding have been submitted as part of this consultation. The authors of the Hydraulic Modelling clearly state that their model has not been calibrated as they had no known flood events to use as references. The public photos collated into the flood review submission for the last application would provide calibration points. The MSDC Drainage and Flood Engineer has responded to our concerns stating that the modelling was reviewed by the Environment Agency (EA) who support it.

We continue to see this as a risk, the EA were told by the applicant that there was no local flooding and the repeated flood photographic evidence all post-dates the EA's review of the modelling. Felbridge Parish Council continue to demand that RPS are requested to calibrate their Hydraulic model using the photographic flood evidence to satisfy the public and businesses who are very concerned about the flood risk upstream and downstream from this site. The revised model would be the most accurate prediction of the future flood risk zones, and would ensure that this development does not generate a negative impact upon the flood risks.

Removal of Category B Tree

Felbridge Parish Council agree with the concerns of local residents that there is no sustainable justification for the removal of the mature oak tree T19 which is a category B tree protected by a TPO. The applicant is stating that it needs to be removed to make way for the access road. Surely for such a significant development an alternative highway access can be sought (albeit by purchase of additional highways frontage) such that a mature protected tree can be retained. We do not see compensatory planting as a suitable substitution for such a dominant tree.