

DM/22/3214 No. 71 and Land South of Crawley Down Road

Felbridge Parish Council 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. It is unclear why the applicant is looking to bring this allocation forward in two phases. This does nothing to aid integration across the site and creates a greater risk of creating two separate developments. This is likely to have a further detrimental effect on the village and the adjacent neighbours. If the applicant is not minded to make a commitment on the site in one application we suggest that a design code that will apply to the full allocation is included as a condition, or ideally requested from the developer for consideration in advance of this application to secure a consistent approach to design across the site.

HIGHWAYS AND TRANSPORT

Felbridge Parish Council does not recognise the modelling of the Star junction presented in that it is more than 3 years old and shows a junction operating within capacity, when more recent studies show that it is exceeding capacity and is declared as a severe junction by Surrey Highways. We believe a current traffic study is necessary to support this site and the future site to the west cited in the application. 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 max queue length) of 48 cars, draws a very different conclusion. 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.

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 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'.

This future improvement scheme has now been cited as the mitigation for the Hill Place Farm (200 units), 17 Copthorne Rd (26 units), 11a Crawley Down Rd (32 units), 15-39 Crawley Down Rd (63 units), 61 Crawley Down Rd (20 units) as well as SA19 (200 units) - a total of 539 units. All of these schemes have quantified the additional impact they will have individually upon the junction. The 2-lanes turning south was previously implemented and withdrawn when it had a significant detrimental impact upon junction performance and we believe there are significant doubts as to whether this proposal would actually deliver any junction capacity. There is also the Surrey County Council agreed need to improve pedestrian crossing facilities at this junction.

In the light of all of this, we ask that if Surrey Highways believe **either** a) That it is unlikely that the improvement scheme as shown in Appendix H of the SA19 Transport Assessment A will be implemented by 2026 **or**; b) That it is unlikely that the 2-lanes turning south, in conjunction with improved pedestrian crossing facilities, will actually deliver a junction capacity increase sufficient to meet the already quantified impact of the 539 units listed above, **then** the current Transport Assessment supporting the SA19 proposal is fundamentally flawed as it is solely based upon that scheme being in place and delivering a quantified benefit by 2026.

The baseline used for the transport assessment is not using the same approach that SCC required for the initial 63 unit scheme at 15 Crawley Down Road (TA/2017/1290). For the previous scheme, the approach was that if the Transport Assessment is based upon a June 2019 traffic survey for the baseline. To this measured traffic level it is necessary to add all the local completions, as well as all the approvals not yet completed, as this is all traffic that is guaranteed to exist before this development is completed. Then, use TEMPRO to uplift the combined 'baseline' traffic to the proposed completion date and add the development traffic to get the cumulative impact of development including this proposal, then model for the +10 year scenarios with and without development. If Surrey County Council insisted that the Transport Assessment was revised like that for 63 units why would they not want the same basis for a 200 unit proposal?

The severity of the Star junction will be challenged by the Examination Inspector for the Tandridge District Plan as the junction is impacted by the proposed South Godstone Garden Community of 4,000 dwellings. The emerging Tandridge District Plan included mitigation of the impact by the proposal to create two lanes turning south from the A264 into the A22. This proposal has already been identified for implementation as mitigation for the 200 houses approved at Hill Place Farm [APP/D3830/W/16/3142487] and the 121 dwellings approved along Crawley Down Road and Copthorne Road [APP/M3645/W/18/3205537, APP/M3645/W/18/3198090 & TA2019/1453]. Thus the proposed mitigation approach has already been put forward as the mitigation for numerous other sites that have been approved, and in some cases completed, despite the agreed mitigation not being implemented.

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". We do not believe that the Atkins study (which SCC and WSCC commissioned) has 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 the Worth Way 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". This principle requires this site to have a comparable density and style of housing to the neighbouring areas whereas the application is for a considerably higher density with properties that are totally different in scale or design.

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.

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." It is noted that this application is referred to as Phase 1 therefore, it is expected that to meet this principle, the density of any further applications for the remaining site would be lower in density than those nearest the access road.

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, the proposed installation of gas boilers and appliances will place an immediate burden on new residents. 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. Equally there is no confirmation of the scale of electric vehicle charging to be provided. 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 Assessment (P8):

The EA flood map shows Zone 2 extending into the site and the RPS model shows virtually no flood risk zone within the site. If the RPS flood model is shown to be overly optimistic this creates a concern relating to the SUDS infiltration basin. This is proposed within the EA Flood Zone 2 area of the site, thus when there is heavy rainfall the SUDS basin [which is intended to retain surface water from the site and release it slowly to reduce the risk of flooding] will already be inundated with Felbridge Water and thus serve no practical purpose.

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 as shown in the photographs below taken over the past three years. The first image is the most recent and was posted as a warning to walkers on the Felbridge Facebook group on 6th November 2022.





Felbridge Parish Council 27 November 2022