



FELBRIDGE PARISH COUNCIL

Felbridge Parish Council strongly support the Regulation 19 response from Tandridge District Council that SA19 is not a sustainable location as it abuts Felbridge and has its vehicular access into the rural settlement of Felbridge which is a '*Tier 3 Rural Settlement which demonstrates a basic level of provision*'. The Tandridge District Council Sustainability Appraisal concluded that this site '*would be unsustainable, with limited gains when compared to the impact on the environment and the settlements themselves*'.

Felbridge Parish Council believe the Inspector should await the results of the Ashdown Forest and Ashplats Wood visitor studies (that were undertaken in late summer 2021) to demonstrate that the local SANGs approach is actually mitigating the impact of local development upon Ashdown Forest before confirming further site allocations within the 7km zone. To date there has been no study to show that this is actually delivering mitigation in the East Grinstead area despite prior MSDC commitments to carry out monitoring of its effectiveness.

FPC are very concerned that the West Sussex County Council's regulation 19 response regarding the Highways issues at the location of SA19 and SA20 has not been adopted in the latest version, the specific part of their response was;

"There is currently no scheme identified to improve the Felbridge junction that achieves all objectives and that all parties consider to be deliverable. Therefore, in the absence of evidence to the contrary, the County Council consider that the Site Allocations DPD should also acknowledge the possibility that improvements may not be deliverable at the Felbridge junction. If improvements are not deliverable, the Mid Sussex Transport Study indicates that the likely impacts of development are increasing delays and/or traffic re-routing via less suitable routes which may require mitigation measures such as traffic calming. Therefore, the County Council request that para 3.16 is amended to acknowledge that if highway improvements are not deliverable, then alternative transport strategy approaches, such as demand management or a major scheme, may need to be introduced to address pre-existing congestion and mitigate the cumulative impacts of development on the highway network."

FPC contend that the Highways Authority are clearly stating that improvements at the Felbridge junction may not be deliverable, leading to non-mitigation of the

severe pre-existing congestion at this location and further development will only add to this unsustainable situation.

FPC wish to respond specifically to MM16, which recognises the better than expected delivery of housing in Mid Sussex. A main (stated) objective of the DPD is to meet the residual housing need left over from the District Plan examination. The submission version of the DPD determined that the residual need was 1,280 homes and the plan allocated 1,764 dwellings. The DPD's residual need has now been updated (effective from April 2021) and has been reduced from 1,280 to 797 homes. So the Plan is required to provide 797 homes but is allocating 1,729. It would appear from the MSDC Planning Portal that during the last 9 months since April 2021, permission has already been granted by MSDC for more than 300 windfall dwellings for large sites (6 or more) and nearly 100 windfall dwellings for small sites (ie. those not recorded in the April 2021 commitments). Without even these windfalls in the last 9 months, the plan is currently allocating more than 4 times the number of houses required by the residual need!

FPC strongly contend that the combination of the significant risk that highways improvements at the Felbridge junction could not be delivered to mitigate the pre-existing severe congestion and the over-delivery of housing in the DPD as a result of MM16, should result in the removal of SA19 and SA20 from the DPD as they are not required to meet the revised housing need and they would bring additional burden onto the highways where severe congestion already exists and the Highways Authority does not have a deliverable solution.