



# FELBRIDGE PARISH COUNCIL

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## **MSDC SITE ALLOCATIONS DEVELOPMENT PLAN DOCUMENT SA19 (Land South of Crawley Down Road, Felbridge)**

**Felbridge Parish Council object to the inclusion of SA19 (Land South of Crawley Down Road) in the MSDC Site Allocation Document.**

We believe that this site:

- 1) Has no suitable access.
- 2) Has a proposed housing density inappropriate to the locality.
- 3) Is inappropriate as it is upon land outside of the East Grinstead built up area that is designated as an 'area of development restraint'.
- 4) Is attaching to the village of Felbridge which has inadequate services to deem it a sustainable location,
- 5) Would add additional traffic into a local road network which is already severely congested and has significant limitations that prevent highway mitigation.

### **Access**

There are two potential proposed accesses to the site shown on the plan. The first is a strip of land within Tandridge District towards the east end of the site through to Crawley Down Road. The second is a short extension of the existing access of Oak Farm Place near the centre of the eastern field of SA19. To consider each of these in turn;

#### **1) Eastern access through to Crawley Down Road**

There is no access at this location. The strip of land indicated as the access was subject to planning application 04/00088/FUL. The area plan and annotated planning application plan is attached in Appendix 1. We have highlighted the proposed access routes in red. It is clear that this route is obstructed by the Plot 7 garage and severely constrained by the house of Plot 7. The area highlighted yellow is the garden of 7 Oak Farm Place, whilst the area highlighted green is the garden of 71 Crawley Down Road.

The proposed access has a field gate set back from Crawley Down Road, but this is only 3.4m between the adjoining property boundaries and is unsuitable as an access for the proposed 200 houses. This compares with the access road width for the approved 200 dwellings at Hill Place Farm which is 7m plus a 2m footway.

It can also be seen that the adjoining property boundaries constrain the proposed access right up to Crawley Down Road preventing the formation of adequate visibility splays. Whilst it may be possible for a developer to purchase a section of frontage from the freehold property east of the entrance point, the land abutting to the west is within Felbridge Playing Fields which was designated a Queen Elizabeth II Playing field in October 2002 and is protected in perpetuity by 'Fields in Trust'. This protected land cannot be utilised to provide a visibility splay to the west, nor can a new access road be created utilising the Playing Field land.

The DPD indicates the investigation of the creation of a ghost right turn into the entrance. The land abutting the north of Crawley Down Road is Registered Common Land (part of Felbridge Village Green) and therefore widening the highway at this location to provide for a ghost right turn is not possible.

Thus, the eastern access proposed for site SA19 is inadequate to support the proposed site.

## **2) Access utilising the existing Oak Farm Place roadway**

There is restricted access at this location. The approach north from the site to the southern boundary of Oak Farm Place is wide but narrows significantly as it meets the 4m wide shared use access road within Oak Farm Place. It can be seen from the photograph in Appendix 2 that the dwellings of plots 1-3 Oak Farm Place are immediately abutting the access road. Therefore, increasing the road use to access an additional 200 houses would have a serious negative impact upon the amenity of these properties.

The existing shared use access road is 4m wide. In front of plots 1-3 Oak Farm Place it could be possible to widen the roadway to the west increasing its carriageway width, but this would require the removal of a number of trees that have Tree Preservation Orders. Even with the tree removal, there is inadequate land between the existing dwellings and the football pitch to provide the necessary carriageway and separate footway. The existing road also deviates to the west in front of plots 1 and 4, this is to avoid the root protection areas of more protected trees on the east side of the access road, further preventing its widening to the necessary width to provide a minimum carriageway and single footpath.

The land abutting to the west is within Felbridge Playing Fields which was designated a Queen Elizabeth II Playing field in October 2002 and is protected in perpetuity by 'Fields in Trust'. This protected land cannot be utilised to provide additional land for a wider access road.

The DPD indicates the investigation of the creation of a ghost right turn into the entrance. The land abutting the north of Crawley Down Road is Registered Common Land (part of Felbridge Village Green) and thus widening the highway at this location to provide for a ghost right turn is not possible.

Thus, the second access proposed for site SA19 is inappropriate as it is impossible for it to provide a suitable access width for 200 houses.

## **Housing Density**

The gross site area is 8.5 hectares, but this is reduced to 6.5 hectares when the flood zone area has been excluded. Therefore, the proposed 200 dwellings on the developable part of the site therefore equates to a net 31 dwellings per hectare (dph). The site abuts the southern edge of the village of Felbridge where the average housing density south of Crawley Down Road varies between 14-24 dph. Therefore, the proposed density is inappropriate for this location, particularly as this will extend the bounds of the village further into the open countryside.

It is noted that in the MSDC Consultation Draft Supplementary Planning Document dated 28<sup>th</sup> October, the Garden Wood Estate and the stretch of the East Grinstead built-up area towards Felbridge is characterised as ‘Low Density Suburban’ which it defines as having a housing density of less than 20 dph. There is also a reference to the design criteria of reducing the housing density approaching the boundary with the countryside. With a housing density of circa 31 dph, the proposed development under SA19 considerably exceeds the MSDC target density for boundary dwellings.

## **Contrary to the Development Planning Policies**

The proposed site is outside the East Grinstead Built up Area and is therefore contrary to adopted District Planning Policy DP12. As the site is designated a Countryside Area of Development Restraint this proposal is also contrary to policy EG2 of the adopted East Grinstead Neighbourhood Plan which states;

“Since 2004 Strategic Gaps have been redefined as Countryside Area of Development Restraint. This affects all land to the west, northwest and southwest of East Grinstead outside of the built-up area boundary. It specifically covers Hill Place Farm, the large Imberhorne Lane and Farm sector, Great Wood, Tilkhurst Farm, Crockshed Wood, Furze Field Wood plus the **Crawley Down Road land areas on the border with Tandridge**, around Tandridge (Felbridge) Water and the area towards Ashurst Wood”.

**“The (East Grinstead) Town Council considers it important to protect such areas in order to ensure that development does not result in the merging or coalescence of settlements and the gradual accretion of development at the urban fringe”.**

Felbridge Parish Council believe that the high level of public support for the East Grinstead Neighbourhood Plan affirms the desire of the electorate to protect these open spaces and that full weight should therefore be given to Policies DP12 and EG2.

## **Impact upon Felbridge Village**

The proposal states that its objective is ‘to deliver a sympathetic extension to Felbridge’. Felbridge is a Surrey Village with 532 dwellings within the built-up area of the Village Boundary. There are current 71 dwellings within Mid Sussex on the south side of Copthorne Road and Crawley Down Road abutting the built-up area of Felbridge Village. Recent permissions have been granted for a further net 120 dwellings in this location. The 200 additional dwellings proposed for this site would make the total houses within Mid Sussex nearly 400. Therefore, Felbridge would have approximately 40% of the village within the neighbouring County.

Felbridge is defined as a rural village within Tandridge District; it has no doctor surgeries, pharmacy, dentist, opticians or any other such infrastructure. Due to the County and District Council process for handling infrastructure contributions resulting from development, not a single pound of funding has been contributed to any Surrey facilities or to fund any infrastructure improvements within Felbridge Village from the 120 Mid Sussex houses recently granted consent or any previous approvals.

Felbridge Village is surrounded by Green Belt on the Surrey side of the built-up area. This constrains development to limited in-filling within the village, thus there is no viable site within Felbridge to provide significant CIL funds to progress infrastructure that could support the existing housing growth within the Sussex part of the village.

Thus, whilst proposed site SA19 will provide a significant financial contribution it will not provide any improvement in infrastructure within the village that it states is being extended by the proposal.

### **Local Transport Issues**

The proposed site will give additional vehicular movements on Crawley Down Road which are likely to want to join the A264 (Cophorne Road) to head either east towards Godstone/Lingfield/East Grinstead or west towards Crawley. Traffic modelling for the 63 dwellings at 39 Crawley Down Road identified that the peak hour movements from that site were 52% eastbound and 48% westbound. These desired routes could be achieved by using Rowplatt Lane to the west of the site entrance or the junction of Crawley Down Road and Cophorne Road to the east. Recent transport studies have shown that following completion of the approved MSDC dwellings on the south of Crawley Down Road, the Rowplatt Lane junction with the A264 Cophorne Road will be at capacity. Rowplatt Lane has also been recently reviewed by Surrey Highways and identified as being unsuitable for HGV's due to its narrow width at the northern end where it joins the A264 Cophorne Road. At this point it is constrained by the dwellings on either side and it is not possible to widen the road to improve the junction capacity.

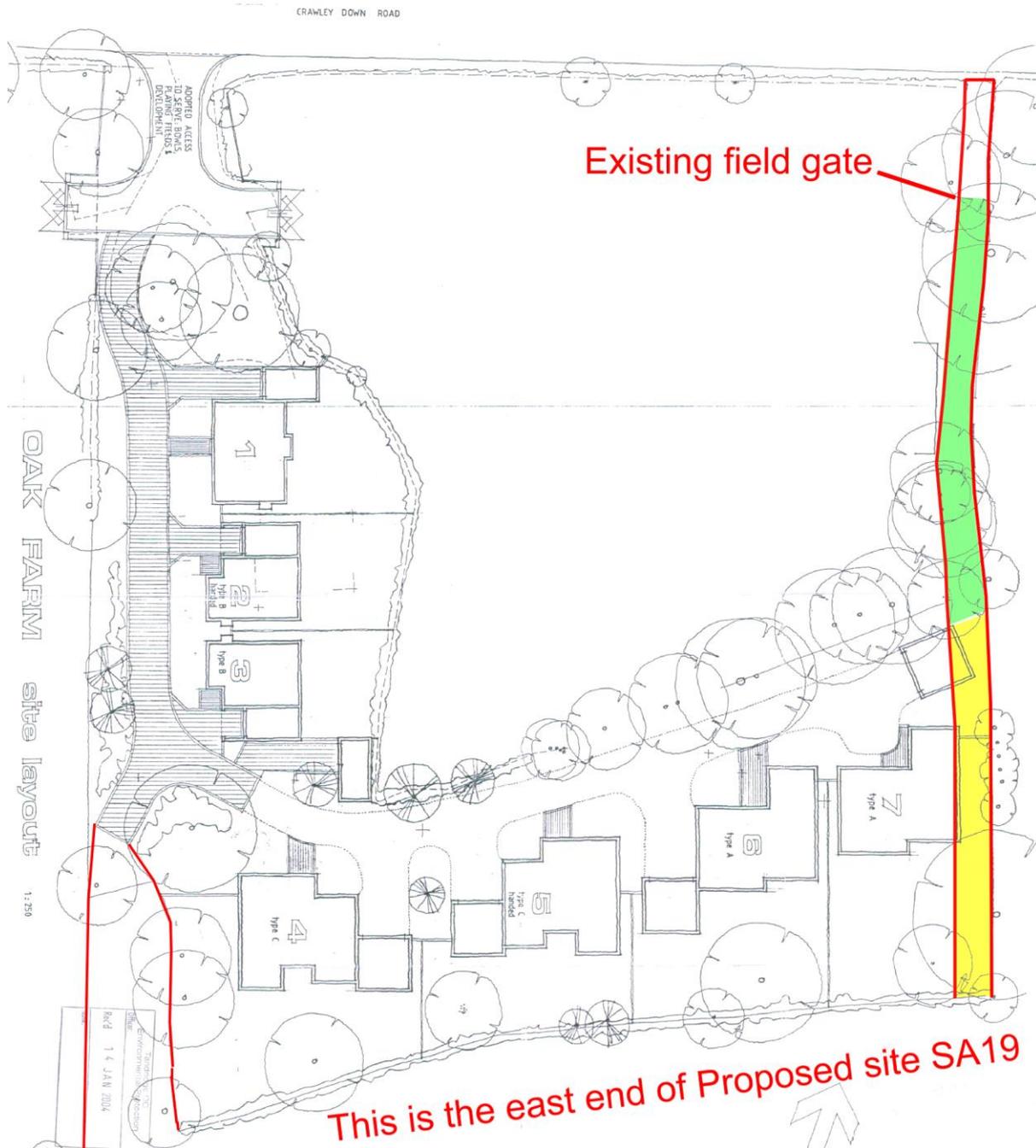
The junction of Crawley Down Road and the A264 Cophorne Road is an acute angle, making the west turn out of Crawley Down Road virtually impossible without encroaching upon the oncoming traffic. The land to the west of the Crawley Down Road/Cophorne Road junction is Felbridge Village Green and is designated Common Land. Surrey Highways have confirmed that they are unable to 'square up' this junction due to the Common Land.

The major A264/A22 junction at The Star is only 820 metres to the east of this site. A July 2018 traffic study showed queues were in excess of 100m for more than 7 hours per day, demonstrating that this is not a 'peak hour' capacity issue. Whilst junction improvements are planned for the Star junction (Hill Place Farm appeal ref: 3142487) these improvements were only intended to provide mitigation for the additional housing at Hill Place Farm. The detailed Transport Assessment for the more recent appeal for land at 39 Crawley Down Road (ref: 3205537) demonstrated that the Star junction would be operating at 95% utilisation, which is its practical capacity even following the planned improvements once all the approved and committed developments (as at 1<sup>st</sup> April 2018) have been occupied. Thus, there is no available junction capacity to accommodate another site in such close proximity.

Appendix 1



Site Location Plan



Annotated plan for application 04/00088/FUL

**Appendix 2**



**Field gate on eastern access route**



**Western access through Oak Farm Place**

