



## East Grinstead Town Council

# Response to the Mid Sussex District Plan Proposed Submission

17/06/2013

## **Mid Sussex District Plan Consultation**

The following is the response of East Grinstead Town Council to the Mid Sussex District Plan Proposed Submission. East Grinstead is a Town in the northernmost geographical reaches of the District Council area. It has 26,000 residents. East Grinstead is not altogether typical of the other towns and settlements of the District, in that it has poor road and rail connections but remains the historical and cultural heart; including a Tudor high street, museum, the Queen Victoria Hospital and Blond McIndoe Research Centre, Sackville College Almshouse, Greenwich Meridian line and the Bluebell Preserved Steam Railway. Lying outside of the town historic houses of interest include Standen, St Hill Manor and Hammerwood Park. East Grinstead is also affected by the Ashdown Forest and applicable governing legislation as the whole of the Town is covered within the 7km zone of influence. This makes planning and development even more difficult and constrained than elsewhere in the District and requires specific measures. The Town Centre is in need of a plan for regeneration to address the needs of the 21<sup>st</sup> century. It is vital that the District Plan supports and does not frustrate this objective in its policies, addressing the constraints with solutions to ensure that East Grinstead remains a sustainable town for residents and business to flourish.

The Draft National Planning Policy Framework (NPPF) and the Localism Bill are driving major changes to the whole planning process. The following is a quote extracted from Rt Hon Greg Clarke MP in his Ministerial Forward in the NPPF.

*“The Purpose of planning is to help achieve sustainable development. Sustainable means ensuring that better lives for ourselves, don’t mean worse lives for future generations. Development means growth”*

This sets the contexts for the whole planning process, which is to deliver Sustainable Development to meet our current and future needs. This is basically a growth agenda with the presumption in favour of sustainable development to support sustainable economic growth. *(The NPPF does make numerous references to what they interpret as sustainable)*

The District Plan has been designed to set out a vision for how Mid Sussex wants to evolve and a delivery strategy for how that will be achieved.

In formulating the response the strategic objectives along with the proposed policies were looked at in detail as well as the background documents including the Draft NPPF, before making individual comments on the policies.

## **General Observations and Background Comment**

The document is itself attractive, laid out well and easy to read. Despite our comment at the draft plan stage in 2012 some of the policies remain in general terms, some lacking detail and others still in need of clarification, as interpretation could be different to each reader. The Town Council urges the District to strengthen these areas to remove any doubt as to the intention of the District Plan and reduce the potential of challenge through interpretation.

It supports the main thrust of the Localism Bill which gives local people more ownership and control of Planning in their Area and supports the process of the Neighbourhood Plans in this respect.

It is based on a Vision of; Protecting and Advancing the Environment, Promoting Economic Vitality, Ensuring Cohesive and safe Communities and Supporting healthy Lifestyles.

The Town Council welcomes the statement that further housing development must be accompanied by suitable and timely infrastructure investment.

### **Vision and Objectives**

**Paragraph 2.4** – The Town Council would like to see reference to the Bluebell Preserved Steam Railway in this section to cross reference with DP17, running within the District to three stations within the district and the hopes of extending a link to Haywards Heath at some point in the future. The physical links needed to make the connection should be referenced as an aspiration during this plan to avoid accidental loss of the possibility.

**Paragraph 2.5** – A point of expansion in that the University of Sussex has campus and building across Sussex not just in Brighton. Should Plumpton Agricultural College due to its proximity to Mid Sussex also have a mention. Academic Education is delivered through the Universities while traditional skills for Britain's vital sustainable industries of agriculture are learned at Plumpton. Skills that should the farming lands of Mid Sussex be neglected would have significant implications.

**Paragraph 2.7** - The Town Council acknowledges the reference to Gatwick Airport and would see reference to the Gatwick Diamond initiative, however the economic benefits of this proximity must be balanced in the plan by reference to the increased problems of pollution (noise and air) that would be inevitable to part of the District through expansion at the airport regardless as to whether this expansion included a mooted second runway. Mitigation and strategy as to how the tranquillity of many living in rural areas within the district would be preserved or protected is needed.

### **The Challenges Facing the District**

**Paragraph 2.8** - The Council welcomes the reference to the infrastructure deficits and particularly in relation to transport. The reference to the A22/A264 congestion is welcomed and further reference to the geographical peculiarity to this particular problem should be included. The A22 runs in to East Grinstead at the Surrey border and exits the town almost immediately at the East Sussex border. As a result the three county councils must be tasked with resolving the congestion of the A22 in partnership and the Town Council would wish to see the District Plan supporting this position.

The Council would further wish to see reference to the challenge of travelling across the District, especially in a southerly direction. Public Transport is limited making sustainable journeys for work, hospital and civic duties difficult at the beginning and end of the day. The expectation of new housing anywhere in the north of the district and especially in the rural villages will bring demand for transport links and more housing is not sustainable without this being addressed. East Grinstead is constrained but could accept reasonable development proposals if the infrastructure was resolved. A commitment to resolving this issue within the life of the plan to remove this constraint would be welcomed.

A further challenge that could be identified is that Mid Sussex would benefit from a sense of belonging, It is a line on a map and not a destination (such as Crawley, Brighton or Eastbourne). A strategy to bring the whole district population in to a position of ownership of the District would help to forge an identity.

**Paragraph 2.11** - The Council endorses the protection of green open spaces and concurs that the wildlife corridors are essential to our habitats. Infill in towns can only go so far as to avoid ecological and landscaping damage.

## Overall Strategy

**Paragraph 3.8** – local housing need being met is paramount to any development to be endorsed. This strategy should reflect the problem that Housing Prices in Mid Sussex are high and many local first time buyers are not able to purchase in the area. Housing Schemes of affordable dwellings are essential to allow communities to remain local. While the high level of travel and ability to commute is recognised, it is not in Mid Sussex's interest to force residents to leave the area in seeking cheaper housing. There are a large number of people who live in the district who are of retirement age, having lived in the properties for a number of years. We understand that Imberhorne ward in East Grinstead has the 2<sup>nd</sup> highest age demographic in the District. This trend has resulted in many family homes being occupied by 1 or 2 residents and the properties not becoming released for new families. Many of the new homes built are being occupied by newcomers from London or elsewhere not local persons as first time buys or families needing more space.

**Paragraph 3.10 and DP5** – The housing number is based on economic growth estimations that have not been achieved over several years. While accepted that this is a top line number the 10,600 target would appear to be over aspiration as the economic development has not kept pace with the projections.

**Paragraph 3.23 and 3.25** – The Council welcomes the identification of the need for mitigation to the Habitats Directive in respect of Ashdown Forest. Noting that any town or village within the 7km zone of influence should not be forced to bear the full burden of this mitigation, as this simply means that investment in infrastructure is then reduced. Clarification that the CIL payments raised across Mid Sussex will contribute to the mitigation and not only the settlements affected is required. Mid Sussex as a whole is affected by the forest and should tackle the problem as a whole.

The mechanism of management of CIL and the decision making process regarding when and where monies will be spent is still unclear in the document. The East Grinstead Town Council wish to see these spelled out as to any ring fencing of at least the 25% monies to be used for communities with a neighbourhood plan, arrangements for any accrued interest to be paid to the town or parish if the monies are held centrally at the District Council. While the intention of normally using money in the community that raised it through development is welcomed the exceptions such as for strategic spend to resolve constraints and other matters should be expanded more fully.

## Policies

### DP1 – Sustainable Development

The Town Council has no comment on this policy

### DP 2 – Sustainable Economic Growth

This policy seems to concentrate on the Burgess Hill development, and while suggesting it could provide employment beyond Burgess Hill fails to appreciate the constraints as mentioned earlier as to travelling around the District. East Grinstead has options to offer concerning Economic Development but due to infrastructure (A22/A264) is constrained from meeting potential. More could be invested in industrial space and a full review of the placement of Charwoods Industrial Estate to explore resiting it to a more accessible location should be undertaken during the life of this plan.

### **DP3- Town Centre Development**

The Council welcome the bullet points under this policy. The redevelopment of Queens Walk in East Grinstead has been so many years in discussion that this must now be prioritised to bring a scheme to fruition. MSDC as a major landowner must undertake to prioritise and support a project that is fit for purpose with appropriate retail and supporting infrastructure. This policy links with DP22 which is welcomed, The Kings Leisure Centre is the oldest of the three MSDC centres, in need of rebuild either on the existing site or if another suitable site could be identified as it is no longer attractive in terms of size and range of facilities available.

### **DP5 – Housing**

The Council reiterates that should the constraints be removed from East Grinstead further appropriate development would be considered. However without this the A22/A264 congestion must refer back to the Atkins 3 study that has identified that even with the works carried out the total increase can be no more than 190. The development or growth of the Town during the 20 year plan period, might identify a need to build more than 190 new houses to meet local needs but this cannot be done without first improvements to existing roads, particularly west towards Crawley and Gatwick to cope with the inevitable increase in traffic. As at this time as there is no undertaking for the improvements even this modest number cannot be allocated, East Grinstead Town Council would seek assurance that the constraints will be tackled to allow appropriate growth in the town to meet local need. East Grinstead Town Council feels strongly that the sites for development should be brought forward from the Neighbourhood Plans. Any speculative site identified by the District Council should not be available for development unless it is also referenced as accepted in the Neighbourhood Plan. Any other scenario will undermine the integrity of the NP and the referendum that will have been required to adopt it. If the NP delivers sites to accommodate the numbers that have been submitted to MSDC there should be no mechanism to force additional housing on to a community.

### **DP9 - Protection and enhancement of countryside**

MSDC Plan recognises that certain types of development can only occur where it is necessary to positively contribute to the rural economy, along with having to conform with certain criteria listed in DP9 that would apply before allowing any development. It defines the countryside as areas outside the built up area boundaries (urban boundaries) which is useful. The plan does recognise the need to balance protection along with the need to ensure the vitality of the rural economy and again this is something we would support. In East Grinstead we also have to give due account to the Ashdown Forest Special Area of Conservation and Special Protection Area.

As previously referred to East Grinstead Town Council would wish to see reference within the DP that deals directly with open green spaces within our urban boundaries, their importance and the need to retain them where possible. As stated above infill can only go so far and some green spaces are important to identify as important to the ecological and aesthetic needs of a town.

### **DP10 - Preventing Coalescence**

The Council would support the policies in DP10 where it wants to prevent coalescence and maintain *existing* gaps (East Grinstead in particular) that are identified in local Neighbourhood Plans or already part of planning documents to prevent the loss of the separate identity of nearby settlements.

### **DP12 - New homes in the countryside**

DP12 has been improved but continues to raise concern as not being clear enough to avoid speculative applications. MSDC policies and operational processes will need to be very robust to avoid challenges as to how and when criteria for special justification is met.

#### **DP14 - Ashdown Forest Special Area of Conservation and Special Protection Area**

The policy set out by MSDC in their plan is of particular interest to East Grinstead as we fall within the 7km buffer zone and the need to provide Suitable Alternative Natural Green Space (SANGS) and an Access Management Strategy that reduces the impact of visitors on special interest features of the designated site. DP14 is still not clear how this will effect new development within the 7km buffer zone and when and how this would come into effect. The Council would wish DP12 to be more specific in its references to SANGS and how mitigation will be expected to be demonstrated and measured, as this will have a strong bearing on the East Grinstead Neighbourhood Plan and that of other villages, parishes within the 7km buffer zone.

#### **DP26 – Accessibility**

East Grinstead Town Council welcomes these proposals and recommends that Disability Access (East Grinstead) should be named as the consultee for all proposals within the district to ensure that accessibility is always a high priority in any design stage.

### **Conclusion**

The Town Council is grateful to Mid Sussex District Council for inviting comments on the draft plan. Our own Neighbourhood Plan must follow the principles of the final District Plan and therefore it is important that we are able to influence areas where we may find that we hold differing views. The Town recognises the need to develop to ensure that Mid Sussex remains an attractive place to live and work, however the development must be appropriately and sensibly planned to ensure that communities retain their individuality and are able to meet the needs of existing and new residents.

The Town Council has offered comment only where the plan is felt not to address specific concerns and further amendment would be welcomed.