



Report to East Grinstead Town Council  
on aspects of the pre-consultation  
Draft Area Action Plan  
produced by  
Mid-Sussex District Council

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## 1.0 INTRODUCTION

1.1 Dialogue (Local Dialogue LLP) was commissioned by East Grinstead Town Council to facilitate two local stakeholder seminars in the town with the aim of assisting the Town Council to develop an alternative approach to Mid Sussex District Council's (MSDC) pre-submission draft Area Action Plan (AAP).

1.2 The seminars took place on 13 September and 28 September 2006.

1.3 The first of the seminars examined the planning context of the AAP and its relationship with the Structure Plan and the Local Development Framework (LDF). It looked at the following issues:

- whether the current AAP demonstrated that any of the relief road options offered the relief envisaged by the West Sussex County Council Structure Plan;
- the amount of brownfield land available;
- the feasibility of including a number of large alternative sites in the vicinity in any alternative AAP approach;
- affordable housing need and whether this was a driver for increased housing, and,
- the balance between new housing and planned employment capacity.

1.4 The second workshop expanded on the planning context of the AAP in the light of recent Independent Examinations (IE) conducted by Planning Inspectors into Development Plan Documents. Through a series of focused table-top exercises the workshop

- established an agreed vision and shared priorities for the East Grinstead of 2016 and beyond;
- looked at how housing numbers and housing locations could be established in a way which better reflected the vision and shared priorities;

- considered the type and level of employment required to develop the vision and the infrastructure required to support it;
- examined the funding options for the infrastructure.

1.5 The workshops were drawn from all three tiers of local government and from local interest groups. There was a high degree of consensus on the key issues which are outlined below in section 3.

## 2.0 PLANNING AND LEGAL ISSUES

- 2.1 Considerable uncertainties – many of a legal nature – continue to shroud the AAP and the new planning system. Some of this is inevitable; the process of preparing LDF documents is part of the new planning system introduced as recently as 2004. Few Development Plan Documents have been tested by IEs conducted by the Planning Inspectorate. Precedent and practical experience are still emerging.
- 2.2 It would, therefore, be worth the Town Council highlighting to MSDC and district councillors some of the implications for the AAP and the production of the LDF which these uncertainties produce.

### Conformity with the Structure Plan

- 2.3 The issue of whether the AAP is in conformity with the Structure Plan is crucial. Given that the PRC (Post Referendum Campaign) obtained very clear and unambiguous advice on this issue from a leading planning QC – Richard Phillips – it is surprising that MSDC has not sought to obtain independent legal advice but has relied on its own internal legal team and the Government Office for the South East (GOSE).
- 2.4 There are two main implications which need to be considered.
- 2.5 First, if the AAP is not in conformity with the Structure Plan it is likely that the AAP as a whole is *ultra vires* and will be rejected as a Development Plan Document at an IE.
- 2.6 Normally, AAPs such as this would not be prepared in advance of the LDF's Core Strategy. Precedent established by Inspectors at the IE into the South Cambridgeshire District Council LDF has confirmed that in normal circumstances the Core Strategy is the first document to be produced and tested and that all subsequent Development Plan Documents, such as AAPs, need to be in conformity with it.

- 2.7 Exceptions exist where AAPs are brought forward to deliver recent existing policies in saved planning documents from the old planning system such as Local Plans and Structure Plans. Such AAPs need to be in conformity with those policies and will subsequently need to be amended when the Core Strategy is finally produced.
- 2.8 If the AAP is not in conformity with the saved Structure Plan policies, it is doubtful whether it can be brought forward at this stage. In addition, given that the bulk of the evidence-base underpinning the Structure Plan was compiled in the 2-3 years prior to its adoption in 2004, there must at least be doubt that any policy (or its evidence-base) in the Structure Plan would be considered sufficiently up-to-date.
- 2.9 Second, for current purposes, for the AAP to be in conformity with the Structure Plan it must satisfy one of two conditions relating to the proposed Strategic Development at East Grinstead. It must either demonstrate that the relief road and the necessary relief as envisaged by the Structure Plan will be delivered. Or, if this is not possible, it must undertake a re-examination of the development strategy contained in the Structure Plan with the aim of producing alternative housing locations to the East Grinstead strategic development.
- 2.10 It is our contention, and that of those attending the workshops, that the necessary relief cannot be demonstrated for any of the proposed routes set out in the AAP and that considerable doubt exists over whether any relief road would be financially viable and, therefore, deliverable, or, would be permitted especially where it has impact on the High Weald AONB.
- 2.11 The attempt by MSDC to force through the current AAP, therefore, has a high chance of coming severely unstuck at its IE on fundamental grounds – grounds which MSDC has so far chosen not to bottom-out in advance. The delay which a rejection of the AAP at IE could cause to the timely production of MSDC's LDF could be severe and could precipitate a planning vacuum in the area. In addition, it would have serious implications for the reputation of the council.

## **The ability to review the Structure Plan**

- 2.12 MSDC and West Sussex County Council (WSCC) have consistently rejected the idea that a review of the Structure Plan's development strategy can take place. They argue that Structure Plans belong to the old planning system i.e. pre-2004, and that there is no provision to revise or produce a Structure Plan under the new legislation (Planning & Compulsory Purchase Act 2004). The latter part of this assertion is true but is the wrong point.
- 2.13 The Structure Plan has been saved i.e. it continues to be the highest level development control document for the county and the district. Eventually it will be succeeded in this role by a combination of the South East Plan and the MSDC Local Development Framework.
- 2.14 Whilst the Structure Plan is still the highest level development control document, all other development control documents such as the AAP need to be in conformity with it. This much is also admitted by MSDC and WSCC.
- 2.15 Unusually and exceptionally, this Structure Plan allows for more than one outcome from a particular policy i.e. that relating to the building of 2,500 houses at East Grinstead. First, it allows for the development to be built contingent on a number of tests including the provision of a relief road and of relief. If those contingencies cannot be delivered, the Structure Plan itself demands that the situation is remedied by a review of the development strategy contained within the Structure Plan.
- 2.16 In the absence of this specific outcome, it is true that the Structure Plan would not now be capable of revision. However, in order to be fully in conformity with the Structure Plan, MSDC cannot pick and choose which bits with which it will conform. It has to conform to it all. Therefore, if it has to conform to the construction of the 2,500 houses at East Grinstead it also logically has to conform to the option of a review of the development strategy if the houses cannot be delivered.

- 2.17 There is no contradiction between the old and new planning systems here. It is a question of following the wishes of the Structure Plan in its entirety.

### **Relationship with the Core Strategy**

- 2.18 A further uncertainty exists in relation to the impact of the AAP on the Core Strategy itself. Work on the preparation of the Core Strategy has determined four likely locational strategies for housing growth in the district. One of these consists of major extensions to Burgess Hill and East Grinstead/Haywards Heath. By producing an AAP at this stage which extends the construction of the East Grinstead Strategic Development beyond 2016 there must at the very least be a strong argument that the AAP has prejudiced the outcome of the Core Strategy prior to any public consultation.

- 2.19 It would, therefore, be prudent for legal clarification to be sought on this issue too before proceeding further with the production of the submission draft of the AAP.

### **The influence of GOSE**

- 2.20 We have already commented elsewhere on the undue pressure MSDC has exerted on elected members to proceed with the AAP or risk direct intervention in the production of its planning documents by GOSE itself, the Planning Inspectorate or the Department for Communities and Local Government.

- 2.21 Councillors should now be seeking independent advice on the level of pressure to which they have been subjected. We have reviewed the appropriate legislation and government guidance and do not consider that any of the exceptional circumstances under which government might intervene are applicable in this case.

- 2.22 In particular, we do not consider that a delay to the production of any documents at this stage would crystallise a challenge from government. Indeed, given the rejection by Inspectors of

Development Plan Documents in Lichfield, Stafford and South Cambridgeshire (which had been produced on the advice of their own local Government Offices) it is unlikely that GOSE would wish to proceed with the production of Development Plan Documents at a rush when considerable legal uncertainties existed *ab initio*.

### **The impact of recent IEs**

2.23 We have mentioned above that recent IEs into Development Plan Documents have rejected the documents. At the very least, councillors should be seeking reassurance from MSDC that the impact of these IEs has been taken into account in taking forward the AAP and other documents.

2.24 Seeking advice from Government Offices alone is now no longer adequate. As indicated above, Lichfield, Stafford and South Cambridgeshire and more recently Shrewsbury and Atcham prepared documents which were all approved by their local Government Offices before being submitted and before being proved inadequate or withdrawn.

2.25 The key points which arose from these IEs were:

- The Core Strategy should normally be the first Development Plan Document produced and other documents should follow sequentially and logically;
- An up-to-date and robust evidence base is essential;
- Realistic alternative options must be properly considered at an early stage;
- The plan must be spatial – with clear links with the community strategy and other plans;
- Plans should be sufficiently flexible to respond to changing circumstances.

2.26 The first of these bullet points has already been dealt with above. The second is extremely pertinent in relation to the inadequacy of the underlying traffic data used in the AAP and the timing of its collection.

The third also presents problems in that MSDC has interpreted it as referring only to alternatives to the relief road and not to the strategic development itself.

- 2.27 On the basis of current evidence there is a high likelihood that the current AAP draft would be rejected at IE.

### 3.0 SUMMARY OF THE WORKSHOPS

3.1 We have set out below a summary of the conclusions of the workshops. These were accepted as providing a viable framework on which the Town Council can build an alternative approach to development in and around the town.

#### **Vision and shared priorities**

3.2 There is a clear, shared vision for the town. This is based around the idea of quality – for example, quality of life, quality of the built environment, quality of the service and retail offering available in the town. This was summed up by the participants in this vision statement:

3.3 *“We want East Grinstead to be a place with opportunity for all, which values a safe and friendly environment and recognises its market town heritage and its links to the surrounding countryside. We want East Grinstead to be a town with a reputation for quality in its built environment, its services and the quality of life it offers. A core element of this is the quality of our retail environment, which we wish to be vibrant and distinctive. It needs to dovetail with the conservation of the historic town centre. There needs to be a clear focus on the scale and areas of development.”*

3.4 This was supported by a large degree of consensus on what were the shared priorities for the town. These revolved around maintaining a sense of place and of community. In particular, they included

- new housing should be integrated with the town, not separate from it;
- affordable housing should be directed towards providing opportunities for younger people to stay in the town;
- employment needed to create a balance between local jobs and commuting and move towards reducing commuting;
- traffic relief needed to be delivered – but there was an open-mindedness as to what specific measures that might include;

- clear development area plans for the town should be produced;
- increased leisure facilities were required;
- the retention of strategic gaps and the town's setting within the countryside;
- improved transport links needed to be developed.

3.5 In delivering the visions and the shared priorities there was consensus that there was already a deficit in necessary infrastructure. This deficit clustered around eight main categories:

- traffic relief (but open-minded as to solutions);
- public transport;
- water/sewerage;
- education and schools;
- leisure and tourism;
- health and community services;
- links to employment;
- IT/wireless/communications.

3.6 There was consensus that future employment growth in the town should focus on sectors that are sustainable. Particular emphasis was given to leisure and tourism, high-tech and to efficient energy management within the business sector. Employment growth needed not to adversely affect the current commuting patterns.

3.7 There was consensus that housing growth must be based on the needs of the town. There was, therefore, a logical process which could be used to identify how much housing growth was in the best interests of the town. This started from the acknowledgement that there was already a substantial amount of growth occurring in small-scale developments (although there was concern about cramming and the inappropriateness of location for some of this). To this could be added the growth required to support the development of the town and the achievement of the objectives and shared priorities. This would, for example, need to reflect the requirement for affordable housing and employment. Beyond this, there was a category of additional housing which the town might be prepared to take if it was the only

way of funding and delivering some of the infrastructure on which the vision for the town depended. In this case, it would recognise that there was some infrastructure which neither local nor central government were now going to fund and where the only source of funding was going to be developer contributions.

3.8 Housing, though, as a whole needed to be integrated with the town utilising the town edges to provide a sustainable pattern of growth.

3.9 A plan for the town should, therefore, be focused, first and foremost, on what the town required for its own development needs and be logical and evidence-based.

### **The current AAP**

3.10 There was also considerable consensus around the current AAP. The main areas were:

- the process adopted by MSDC and WSCC had significantly undermined confidence in the AAP as a whole and in the traffic and relief data in particular;
- the current data showed that none of the relief road options offered sufficient relief;
- there was no belief that a relief road would be delivered or be financially viable;
- there was consensus on how some of the different interpretations of 'relief' could be reconciled;
- there was consensus in the need to explore in detail an option which did not involve a relief road at all;
- there was consensus in the need to produce an alternative development strategy than one based on a strategic development;
- sites to the east of Crawley did offer real alternatives to the strategic development notwithstanding the various levels of constraint which applied to them;
- the current AAP has got the balance seriously wrong between housing and employment provision;

- the AAP needs to be more holistic – the town is more than just housing;
- the AAP needs to be focused on the needs of East Grinstead;
- the AAP was poorly integrated with other local plans;
- there needs to be local engagement with the traffic modelling;
- the legal issues outstanding were real and needed to be answered;
- the AAP was not fit for purpose and would not be likely to survive an EI.

3.11 The areas of consensus around the definition of what constituted relief and how it should be measured were as follows:

Objector view	Consensus view	MSDC view
<b>How relief should be measured</b>		
<ul style="list-style-type: none"> <li>• Measure impact of strategic development and congestion relief on the whole town.</li> </ul>	<b>MEASURED BY IMPACT ON TOWN AS A WHOLE</b>	<ul style="list-style-type: none"> <li>• Measured by impact on selected points in town centre.</li> </ul>
<ul style="list-style-type: none"> <li>• Both congestion and net traffic relief have to be measured by comparing 2004 with 2016</li> </ul>	<b>2004 FIGURES FOR BOTH</b>	<ul style="list-style-type: none"> <li>• Congestion by comparing 2004 with 2016. Traffic relief by 2016 with and 2016 without strategic development</li> </ul>
<ul style="list-style-type: none"> <li>• Relief must be demonstrated for East Grinstead as a whole</li> </ul>	<b>RELIEF FOR EAST GRINSTEAD AS A WHOLE</b>	<ul style="list-style-type: none"> <li>• Relief can be measured against specific congestion hot-spots</li> </ul>
<ul style="list-style-type: none"> <li>• Structure Plan tests stand alone. Pre-conditions for the strategic development are unambiguous</li> </ul>	<b>PRE-CONDITIONS UNAMBIGUOUS</b>	<ul style="list-style-type: none"> <li>• Broader WSCC transport policies are relevant. Traffic could be offset by other mitigation measures</li> </ul>
<b>Addressing errors and omissions</b>		
<ul style="list-style-type: none"> <li>• Errors and omissions in underlying reports cast doubt on ability to achieve Structure Plan requirements</li> </ul>	<b>NO CONFIDENCE IN PROCESS DRAFT AAP NOT FIT FOR PURPOSE</b>	<ul style="list-style-type: none"> <li>• Iterative process of tightening model.</li> </ul>
<ul style="list-style-type: none"> <li>• Draft AAP needed to establish that the Structure Plan pre-conditions will be met.</li> </ul>	<b>AAP NEEDS TO SHOW MORE THAN POTENTIAL %s CAN BE MISLEADING AND IS SCOPE FOR PRAGMATIC VIEW ON QUANTUM OF RELIEF HUGE AMOUNT OF WORK REQUIRED TO BE DONE</b>	<ul style="list-style-type: none"> <li>• Draft AAP needed to show that there is the potential to meet the Structure Plan pre-conditions</li> </ul>

3.12 Finally, there was consensus in calling on MSDC to avoid the continuing ill-feeling and sense of isolation caused by the AAP and the way it had been

produced and for advantage to be taken of the ability to look again at the development strategy for the district.

## SPECIFIC SUPPORTING QUESTIONS ASKED BY EAST GRINSTEAD TOWN COUNCIL

### 4.0 THE RELIEF ROAD

#### The Issue

*Do any of the relief road options offer the relief envisaged in the Structure Plan?*

4.1 The question is not easy to answer given that, for the reasons set out in paragraph 3.11 above, there are fundamental differences in measuring how the relief should be calculated and to what it should apply. The question has, therefore, been answered in the context of the consensus definitions achieved at the workshops as set out in 3.11.

#### The Relief Road Options

4.2 Six options have been put forward by MSDC for the relief road for East Grinstead. An analysis of these options indicate that in each case wholesale 'relief' of traffic will not happen. The following six tables indicate the impact on the morning, evening and during the day traffic peak flows for each of the options. A + indicates increases in traffic. A – indicates a decrease in traffic.

*Table 4.a:*

Route 1a 2c 3a	Centre	Beeching Way	Turners Hill Rd
Am	-	-	+
Interpeak	no effect	-	+
pm	+	+	+

Table 4.b:

Route 1a 2c 3b	Centre	Beeching Way	Turners Hill Rd
Am	-	-	+
Interpeak	no effect	-	+
pm	+	-	-

Table 4.c:

Route 1a 2d 3a	Centre	Beeching Way	Turners Hill
Am	-	-	+
Interpeak	-	-	+
pm	+	+	+

Table 4.d:

Route 1b 2c 3a	Centre	Beeching Way	Turners Hill Rd
Am	-	-	+
Interpeak	-	-	+
pm	+	+	+

Table 4.e:

Route 1a 2c 3c	Centre	Beeching Way	Turners Hill Rd
Am	-	-	+
Interpeak	-	-	+
pm	+	No effect	+

Table 4.f:

Route 1a 2e	Centre	Beeching Way	Turners Hill Rd
Am	-	-	-
Interpeak	-	-	+
pm	+	-	-

Table 4.g:

Route 1b 2e	Centre	Beeching Way	Turners Hill Rd
Am	-	-	-
Interpeak	-	-	+
pm	+	-	-

### Comments

- 4.3 Our overall answer to the question must, therefore, be that none of the relief road routes set out in the AAP offers the relief envisaged in the Structure Plan.
- 4.4 There is a considerable amount of additional work required by WSCC to validate and support the data on which the AAP is based. There are inaccuracies in the data and contradictions in statements made. There are, therefore, large gaps in the data provided.
- 4.5 It is clear that the implications of the Town Centre Master Plan have not been considered by MSDC/WSCC in compiling these figures.
- 4.6 The figures used for projected commuting numbers are inadequate and do not sufficiently take into account the imbalance which exists between the proposed development and the provision of local employment opportunities.

- 4.7 There is, therefore, need for considerable additional modelling and for more accurate and up-to-date data collection. In particular, there needs to be modelling of at least one option which does not involve a relief road.
- 4.8 The current process is opaque and the data is not easily accessible or well-presented. As a result, there is no confidence that the process undertaken by WSCC in reaching its conclusions is robust or accurate.
- 4.9 A more consultative, open process should be adopted going forward.

## 5.0 PREVIOUSLY DEVELOPED LAND

### The Issue

*Was the amount of available brownfield land underestimated at the time of the Structure Plan? Has it changed? What is the impact?*

### The Policy Situation

#### *West Sussex Structure Plan*

5.1 The West Sussex Structure Plan (adopted October 2004) planned for an annual average of 3,100 homes per annum equalling a total of 46,500 homes in the county over the period 2001-2016. The proportion of this requirement allocated to Mid Sussex is 10,175 additional homes or an annual rate of 680.

5.2 The Structure Plan set out how the 46,500 homes would be provided over the plan period. The housing requirement would be achieved as follows:

*Table 5.a West Sussex and Mid Sussex Housing Allocation 2001-2016*

	Dwellings		Mid Sussex
	No.	%	No.
<b>Commitments</b>			
<i>Completions on identified sites to 2001</i>	11,568	25%	1,272
<i>Commitments added in 2000-01</i>	2,100	5%	1,138
<b>Adjusted total (to nearest 5 units)</b>	<b>13,670</b>	<b>30%</b>	<b>2,410</b>
<b>Unidentified Previously Developed Land 2001-2016</b>	<b>22,050</b>	<b>47%</b>	<b>4,415</b>
<b>Greenfield Development</b>			
<i>Small-Scale</i>	1,750	4%	350
<i>Large-Scale</i>	9,030	19%	3,000
<b>Greenfield Total</b>	<b>10,780</b>	<b>23%</b>	<b>3,350</b>
<b>Total</b>	<b>46,500</b>	<b>100%</b>	<b>10,175</b>

5.3 As part of the Structure Plan, and to identify locations for the large scale greenfield allocations, a Development Strategy was prepared by the County. This indicated that new Strategic Locations would be required to provide about 6,500 homes in the north east of the county and a further 2,500 would be required in the coastal areas. The strategy indicated locations that were considered to offer the best balance of advantages over disadvantages. The locations and housing allocation is as follows:

*Table 5.b: Strategic Allocations in the North East of West Sussex*

	<b>No. of Dwellings</b>	<b>Timescale</b>
<b>South-west of Chichester City</b>	750	After 2006
<b>East of Chichester District/west of Arun District</b>	1,750	After 2011
<b>West of Burgess Hill</b>	500	After 2011
<b>West of Crawley</b>	2,500	After 2006
<b>West of East Grinstead</b>	2,500	After 2006
<b>West and/or south west of Horsham</b>	1,000	After 2011
<b>Total</b>	<b>9,000</b>	

*Draft East Grinstead Area Action Plan*

5.4 The Draft EGAAP sets out the position for Mid Sussex as a whole and East Grinstead in the context of the housing requirements from RPG 9 and the West Sussex Structure Plan.

5.5 The Structure Plan had indicated that development at East Grinstead would occur after 2006; this timetable has now been revised and development is expected to commence in 2012/13. This has implications for meeting the housing requirement from the Structure Plan. It is expected that only 1,300 of the 2,500 homes will be delivered by 2016 and that the remaining 1,200 will be delivered in the first part of the period 2016-2026. The table below sets out the revised housing requirement for Mid Sussex taking into account dwelling completions to 2006 and the change to the timescale of the East Grinstead strategic development.

Table 5.c: Housing Requirement for Mid Sussex 2006-2016 (Net figures)

<b>No. of dwellings (net)</b>	
Outstanding Structure Plan requirement 2006-2016	7,255
<i>Identified sites (sites with permission and/or allocated in the Local Plan)</i>	2,410
<i>Unidentified previously developed land sites target</i>	2,730
<i>Estimated proportion of East Grinstead strategic development</i>	1,300
<i>Small scale greenfield sites</i>	815

### Requirements for Dwellings on Previously Developed Land

5.6 Dwellings on previously developed land (PDL) make up a large proportion of the housing requirement. The table below indicates how the housing requirement for Mid Sussex has changed over time through the progress of the West Sussex Structure Plan and latterly the publication of the Small Scale Housing Allocations DPD and the draft East Grinstead AAP.

Table 5.d: West Sussex Structure Plan 2001-2016: Evolution of Housing Requirement Figures showing the change in requirement from unidentified PDL

	Deposit Draft Structure Plan 2001	Mid Sussex EiP Statement of Case	EiP Inspectors Report	Adopted Structure Plan 2004	Mid Sussex Position 2006 *
Completions	1,272	Statement of Case agreed with the housing figures set out in the deposit draft of the structure plan.	1,272	2,810	2,920
Commitments (Permissions & allocations)	1,138		1,538		2,410
Unidentified PDL	4,415		4,415	4,415	2,730
Small Scale Greenfield	350		450	450	815
Strategic Allocation	3,000		2,500	2,500	1,300
<b>Total</b>	<b>10,175</b>		<b>10,175</b>	<b>10,175</b>	<b>10,175</b>

\* - Figures from the Small Scale Housing Allocations DPD and the draft East Grinstead AAP.

5.7 This table shows that the level of provision of dwellings on PDL making up the total housing requirement has, broadly, remained the same. However, this figure has reduced with the publication of the DPD and AAP by Mid Sussex. This is largely due to the increase in completions and commitments which have occurred with the adoption of the Mid Sussex Local Plan in 2004.

### **The East Grinstead Strategic Allocation**

5.8 Since the adoption of the Mid Sussex Local Plan, the West Sussex Structure Plan has been adopted (also in 2004) carrying with it the requirement for the East Grinstead strategic allocation and the housing requirement of 10,175. It was envisaged that this allocation would be complete by 2016 but the timetable for development has now been pushed back. The East Grinstead AAP states that the development is expected to be complete by 2020.

5.9 This change in the timetable means that there will be a shortfall in the housing requirement, as set out in Structure Plan, for Mid Sussex due to the reduction in the contribution from the strategic allocation (2,500 to 1,300). This has subsequently been addressed through the publication of the Small Scale Housing Allocations DPD and the draft East Grinstead AAP.

5.10 The last column of Table 5 above indicates how the housing requirement is now envisaged to be fulfilled and shows the following changes:

- an increase in completions;
- an increase in commitments;
- a reduction in the requirement from PDL ;
- an increase in small scale greenfield allocation.

5.11 The increase in completions occurs simply through the passage of time and reflects the number of dwellings constructed since 2001 and the adoption of the structure plan.

- 5.12 The increase in commitments is reflects the passage of time through the granting of planning permissions but also with the adoption of the Local Plan and the number of housing allocations included within the plan. In addition the Small Scale Housing Allocation DPD also includes allocations for 448 dwellings on previously developed land. It is likely that these sites may have otherwise come forward as windfall sites and therefore been included as part of the PDL total. The inclusion of the sites within the Small Scale Housing Allocation DPD indicates that the Council wishes to promote the development of these sites and in effect set the timescale for the development of these sites.
- 5.13 The PDL total is quantified through the Urban Potential Study. The study has indicated that there is brownfield capacity for this level of development. The amount has fallen as the Council have allocated more sites as part of both the adopted Local Plan (commitments) and within the Small Scale Housing Allocation DPD.
- 5.14 The increase in the small scale greenfield allocations is as a result of the Small Scale Housing Allocations DPD (2006) which identifies additional small scale greenfield sites for development.

## **Conclusions**

- 5.15 The contribution of PDL to the housing requirement for MSDC has largely remained constant in the process of the adoption of the Local Plan and West Sussex Structure Plan.
- 5.16 The newly published Small Scale Housing Allocations DPD and the draft East Grinstead AAP allow for a greater provision of the housing allocation to be accounted for by small scale greenfield allocations and larger brownfield allocations. The ability of Mid Sussex to adjust the housing requirement to take account of the change in the timetable of the East Grinstead AAP is a reflection of a change in timescales for the delivery of large brownfield and small greenfield allocations across the district.

## 6.0 ALTERNATIVE SITES

### The Issue

*Do sites to the East of Crawley offer real alternatives to the strategic development?*

### Introduction

6.1 Four sites were highlighted by East Grinstead Town Council for consideration from the point of view of planning history and constraints. The sites have appeared in two W S Atkins studies. Information on the sites has been taken from these studies as well as the Local Plan and proposals map and conversations with local landowners. Estimated capacity of the sites has been based on a housing density of 30 dwellings per hectare.

### Land East of Crawley

#### *Designation on Local Plan Proposals Map*

- Whole site identified as a Countryside Area of Development Restraint
- Whole site is within a Strategic Gap
- Parts of the site are within a Floodplain

#### *Description of the Site*

6.2 This is a 55 hectare site as well as an additional 15 hectares owned by Crawley BC which is not part of the current consortium of land owners. The 70 hectare site in total is separated from Copthorne by a strip of land approximately 3 hectares. 24-28 hectares of the land is previously developed. A 4 hectare area to the north of the site was used as a household landfill area – the site is stable and could provide an area of open space or for noise attenuation from the M23.

#### *Development Potential*

6.3 The site is already owned as part of a consortium so there are no land ownership issues. The site has its own access over the motorway as well as under the existing Copthorne Way. There is no secondary

school in Copthorne and at the moment pupils travel to East Grinstead. Development at this site could facilitate the provision of a school in the town.

- 6.4 The site is currently being promoted through the South East plan and with the district council. Based on an area of 70 hectares, the site has the capacity for 2,100 dwellings.

### **Land north of Copthorne Road**

#### *Designation on Local Plan Proposals Map*

- Whole site identified as a Countryside Area of Development Restraint
- Whole site is within a Strategic Gap

#### *Description of the Site*

- 6.5 The site is a triangle of land between Copthorne Road and the A264 on the west side of Copthorne. The site extends to approximately 20 hectares and comprises 27 residential properties and surrounding land. In addition, the site contains a plant hire business and a car repair and maintenance garage.

#### *Development Potential*

- 6.6 The site was promoted through the consultation of the Small Sites Allocation DPD and has subsequently been included in the Alternative Sites document published in September 2006. It is estimated that the site has the capacity for 615 dwellings.

### **Crabbett Park**

#### *Designation on Local Plan Proposals Map*

- Whole site identified as a Countryside Area of Development Restraint
- Whole site is within a Strategic Gap
- Southern part of the site is identified as the High Weald AONB
- Worth Way runs along the southern boundary of the site

### *Description of the Site*

- 6.7 Site access can be achieved from the north via the A2220 and connecting further south to the M23. The site is well contained with existing woodland and tree belts, however the southern and eastern edges of the site will require screen planting to ameliorate views of the development and provide an appropriate edge between the site and Worth Lodge Farm.
- 6.8 The site comprises small-scale fields and some urbanizing elements including a hotel. The northern edge of the site adjoins ribbon development on A2220, between Crawley and Copthorne.

### *Development Potential*

- 6.9 The site is not integrated with the eastern edge of Crawley; there are severance issues associated with the M23. Development should aim to avoid coalescence with Copthorne, immediately to the north.
- 6.10 The site could accommodate sufficient housing and community infrastructure within an attractive landscape setting. However, despite new transport infrastructure it is still likely to suffer potential severance from the rest of Crawley due to its location east of the motorway. Another factor against this site is the cumulative impact of the pending East Grinstead development on the strategic highway network.

## **Pease Pottage**

### *Designation on Local Plan Proposals Map*

- Whole site identified as a Countryside Area of Development Restraint
- Whole site is within a Strategic Gap
- Whole site is identified as the High Weald AONB

### *Description of the Site*

- 6.11 The site can be accessed from J11 of the M23. The area of land is located to the south of the M23 which is rural in character. Urban elements are limited to the influence of the Pease Pottage Services and M23 to the west and overhead pylons which traverse the site

east-west and north-south. Development is limited to farm buildings and steadings, set within the context of high forest.

- 6.12 Part of the site is comprised of deciduous and coniferous high forest and southern portion of the site is bounded by similar forest. The eastern and southern portion of the site is by comparison open with hedgerow vegetation defining field boundaries.
- 6.13 Land is in two ownerships and extends to approximately 180 hectares. The site immediately abuts junction 11 of the M23. The site has good road access although improvements would be required to the existing interchange.

#### *Development Potential*

- 6.14 The site is within an AONB although this is of poor quality and the site is visually constrained. There is access from the site directly to Crawley and Gatwick. The site would be easy to extend or expand and there are no land assembly problems.
- 6.15 Representations have been made to the council through informal pre-application meetings and also representations to the Core Strategy and the Small Site Allocations DPD
- 6.16 Capacity for 2500-3000 houses would require extensive structural landscaping so as not to impact detrimentally on the AONB and also to minimize noise disturbance from the M23.
- 6.17 The site is furthest away from Burgess Hill and Haywards Heath so would develop an alternative part of the District. There is some reluctance from Crawley BC to 'leapfrog' Crawley over the M23 but it will have to happen at some point and this site would be considered the most preferable in terms of landscape, traffic, concentration of development etc.

## **Conclusions**

- 6.18 Sites West of Copthorne provide perhaps the best location for housing development. However, with all sites there is an element of constraint that would have to be overcome and policy choices made.

## 7.0 AFFORDABLE HOUSING

### The Issue

*Is the affordable housing need being met?*

### Affordable Housing Requirement and Provision

7.1 In 2004, Mid Sussex published a Housing Requirements Study. This report indicated that there was an annual affordable housing shortfall of 551 units. A further Demand and Supply Analysis document was published in 2004. This set out the affordable housing requirement for East Grinstead. The report showed that there was a deficit of all types of affordable housing within East Grinstead.

*Table 7.a: Surplus/Shortfall of Housing in East Grinstead*

Bedroom Size	Private Housing		Affordable Housing	
	Shortfall	Surplus	Shortfall	Surplus
1	123	-	417	-
2	-	133	218	-
3	-	552	65	-
4	-	7	3	-
<b>Total</b>	<b>123</b>	<b>692</b>	<b>703</b>	

7.2 Data from the Council's Annual Monitoring Report (AMR) shows that during the period from the 1st April 2004 through to the 31st March 2005, 68 affordable dwellings were completed. Of this figure, 54 were affordable rented homes and 14 were shared ownership. From the 1st April 2004 through to the 31st March 2005 two Section 106 agreements were signed that contributed a combined £420,000 towards the provision of affordable housing in the district. In addition, three other Section 106 agreements were signed which will provide 31 affordable housing units, once constructed.

7.3 Current housing commitments also provide an expected supply of affordable housing. An assessment of future provision from this source indicates that existing commitments total 273 units with a projected affordable housing provision of 87 up to 2010.

7.4 In addition to commitments are the housing allocations included within the adopted Mid Sussex Local Plan. These allocations and affordable housing provision are included in the table below.

*Table 7.b Housing Allocations and Affordable Housing Provision in East Grinstead*

	<b>Dwellings</b>	<b>Affordable Housing</b>
<b>Former Gas Works, Moat Road</b>	59	17
<b>Land at East Grinstead Lawn Tennis and Squash Club</b>	40	12
<b>Car Park, Railway Approach</b>	28	8
<b>2-4 Orchard Way</b>	12	-
<b>Stonequarry Woods</b>	40	16
<b>Total</b>	<b>179</b>	<b>53</b>

### **Conclusions**

7.5 There is a significant need for affordable housing across Mid Sussex and East Grinstead. The current need of affordable housing will not be met from the existing housing allocation for Mid Sussex.

7.6 The contribution of affordable housing from the strategic allocation would be significant and would go some way to meeting this need. However, to meet the overall need for affordable housing could require either a change in the current affordable housing % required on developments (this would affect profitability and the willingness to bring sites forward) or alternatively there could be an increase in the housing numbers for East Grinstead or Mid Sussex as a whole.

## **8.0 EMPLOYMENT**

### **The Issue**

*What is the balance between new housing and jobs?*

### **Introduction**

- 8.1 In order to assess the adequacy of the employment allocation in the AAP two approaches can be taken. The first estimates the increase in those likely to be seeking work and the second estimates the required increase in terms of workspace.
- 8.2 Two calculations are set out below which show that there is no balance in the AAP between housing and jobs based on current floorspace commitments.
- 8.3 Assessing the link between housing and employment at this stage is by its very nature inexact. It depends on a number of assumptions which have varying degrees of reliability. MSDC has published a paper, subsequent to our workshops, to try to justify that there is balance between housing and employment. In our view, this paper is disingenuous and seeks to draw in evidence from other developments in and around the town which cannot at this stage be justified.
- 8.4 In our view, the starting point for answering the question posed by East Grinstead Town Council is with the proposed strategic development and the agreed number of 4,500 additional houses for the town as a whole.

### **Existing Situation**

- 8.5 The West Sussex Structure Plan states that Mid Sussex needs to provide 210,000 sqm of employment floor space between 2001-2016. The Structure Plan states that this requirement would assist with the need for jobs in the Crawley/Gatwick area.

Table 8.a: Performance against West Sussex Structure Plan

<b>Total Requirement - 210,000 sq metres</b>			
	<b>Small Sites</b>	<b>Large Sites</b>	<b>Total</b>
<b>Completed &amp; Occupied 01 to 04</b>	21,842	13,276	<b>35,118</b>
<b>Completed &amp; Occupied 04 to 05</b>	3,234	1,144	<b>4,378</b>
<b>Total Built</b>	25,076	14,420	<b>39,496</b>
<b>Balance Required</b>			<b>170,504</b>
<b>Large Site Commitment*</b>		102,242	<b>102,242</b>
<b>Small Site Allowance</b>	57,000		<b>57,000</b>
<b>Completed</b>			<b>14,420</b>
<b>Allowance Remainder</b>	<b>42,580</b>		
<b>Total Commitment &amp; Allowance*</b>	<b>144,822</b>		
<b>Total to be provided</b>	<b>25,682</b>		

8.6 In the context of the requirement for additional employment floorspace, the following table sets out the provision of employment floorspace in East Grinstead.

Table 8.b: Existing Employment Provision in East Grinstead

	<b>Premises</b>	<b>Floorspace</b>
<b>Office</b>	195	55,000 sqm
<b>Factory</b>	92	56,000 sqm
<b>Warehouse</b>	74	36,000 sqm
<b>Total</b>	361	147,000 sqm

### **Employment and Workers in East Grinstead**

8.7 Data taken from the 2001 census for the wards in East Grinstead indicate that, of the economically active population, 5,545 (almost 50%) live and work in East Grinstead and 6,722 travel elsewhere to work. The total economically active population living in East Grinstead is, therefore, 12,267 workers. The following table indicates the main destinations for workers.

*Table 8.c Most Popular Destination for workers living in East Grinstead*

	<b>No.</b>	<b>%</b>
East Grinstead	5,455	45%
Crawley	1,422	12%
Inner London	917	8%
Tandridge	881	7%
Rest of Mid Sussex	723	7%
Outer London	714	6%
Reigate and Banstead	406	3%
Wealden	371	3%

8.8 In addition to those workers living in East Grinstead who work in the town, a further 5,737 workers travel to East Grinstead to work. Therefore, overall, there are a total of 11,282 workers in the town of which 49% live in East Grinstead.

### **The Future Situation**

8.9 The future number of workers in East Grinstead and the resulting requirement for employment floorspace is a factor of the amount of housing required to be built in the town. For this purpose we have considered the requirement for employment floorspace up the date that the East Grinstead Strategic allocation is expected to be completed.

8.10 A total of 4,500 houses has, therefore, been included in the calculation. The worker per household ratio is based on the average in the 2001 census which is 1.7 economically active people per household.

8.11 Taking the strategic allocation alone, therefore, it is likely to create 4,250 new workers.

### **Future Employment Floorspace Scenarios**

8.12 A document produced by the ODPM entitled “Employment Land Reviews: Guidance Note” provides employment density ratios which

give an estimate of the floorspace required per person and, therefore, an estimate of the employment floorspace required to support a given number of workers. The report indicates the following ratios:

*Table 8.d: Floorspace per Worker by Property Type, London and South East (Net)*

	<b>Floorspace per Worker (sqm)</b>	
	<b>Roger Tym, 1997</b>	<b>DTZ Piedad, 2004</b>
Offices	17.9	18.3
Industrial	31.8	38.2
Manufacturing	29.7	-
Warehousing (general)	40.1	-
Warehousing (with loading bays e.g. DIY)	-	78.2

8.13 For the purposes of this study, an average requirement of 28.25 sqm employment floorspace per worker has been assumed.

8.14 A balance of 50:50 between those who work in East Grinstead and those who commute out has been assumed.

8.15 The effect of this in terms of required floorspace is set out below.

*Table 8.e: Shortfall calculations*

**Strategic development alone**

Number of houses	Number of workers	Space requirement in sqm	Space requirement in sqm
		All to work in EG	50% to work in EG
2,500	4,250	120,063	60,031
Planned space		<u>-40,000</u>	<u>-40,000</u>
Shortfall		80,063	20,031

**East Grinstead as a whole**

Number of houses	Number of workers	Space requirement in sqm	Space requirement in sqm
		All to work in EG	50% to work in EG
4,500	7,650	216,113	108,056
Planned space		<u>-40,000</u>	<u>-40,000</u>
Shortfall		176,113	68,056

8.16 Looked at from the point of view of number of workers first rather than floorspace, the following picture emerges.

*Table 8.f: Alternative shortfall calculations*

Number of houses	Number of workers
4,500	7,650
Workers live and work in EG now	5,545
Additional workers @50%	<u>3,825</u>
Total live and work in EG in 2020	9,370
Space requirement sqm	264,703
Current space	-147,000
Planned space	<u>-40,000</u>
Shortfall	77,703

8.17 On the basis of these calculations there is likely to be a shortfall of between 70,000 and 80,000 sqm before any allowance is made for East Grinstead's share of any additional floorspace that MSDC is required to provide to meet the Structure Plan requirements.

### **Meeting the shortfall**

8.18 MSDC has argued that the shortfall will be made up of

- 23,000 sqm additional floorspace at Birches Industrial Estate (equating in our model to an additional 815 jobs);
- 2,000 jobs in schools, community facilities shops etc. as a result of the strategic development;
- 300 jobs over the next 20 years as result of the Town Centre Master Plan;
- unspecified temporary jobs in the construction period and as a consequential knock-on.

8.19 The basis for these assumptions is flimsy.

- only part of Birches Industrial Estate has permission. The rest is subject to discussion;

- no figure has been entered for an offset reduction in employment floorspace at Charlwoods Estate;
- no evidence is provided to support any additional increase as a result of jobs in schools, community facilities shops etc. let alone one as high as 2,000. In addition, this is described as only 'possible' by MSDC itself;
- no figure as a result of the Town Centre Master Plan can be justified given that it was admitted by district councillors at the workshop that the AAP has not been integrated with the Town Centre Master Plan;
- temporary construction jobs are irrelevant and, where they do arise, are likely to give rise to daily inward commuting.

8.20 On the basis of the secure provision of only 40,000 sqm new floorspace, the impact of the shortfall on increased out-commuting is likely to be significant. This has not been taken into account in the calculations used to underpin the relief road options.

8.21 The impact of trying to meet or even reduce the current commuting pattern is likely to involve significant additional employment construction which will have an effect on the character of the town.

8.22 In reality, the situation is likely to be made more complex if those seeking employment in East Grinstead who do not live there are taken in to account. The Structure Plan recognised that the MSDC employment requirement would, after all, assist with the need for jobs in the Crawley/Gatwick area.