



EAST GRINSTEAD TOWN COUNCIL

A PLAN FOR THE TOWN:
A COMMUNITY REVIEW -
AN ALTERNATIVE APPROACH
TO
MSDC's DRAFT AREA ACTION PLAN

October 2006

1. Introduction

- 1.1 The aim of this Community Review is to provide additional input to the 3rd July 2006 Town Council submission to the District Council on their draft Area Action Plan (AAP). The document is focused on outlining areas of community, legal and planning concern in the draft and on proposing alternative approaches addressing those concerns. This approach is designed to meet Structure Plan requirements and also be capable of attracting a significant measure of local consensus. Above all it is intended to be constructive, coherent and credible contributions to the work being undertaken by MSDC, work of fundamental importance to the future of East Grinstead.
- 1.2 The Review derives from four main sources.
- (i) Town Council policy resolutions relating to the Structure Plan and Area Action Plan since 2002.
 - (ii) Specific research commissioned by the Town Council from its Planning Consultant.
 - (iii) Two Seminars with a wide range of stakeholders – local elected Members, business and community representatives.
 - (iv) Public Meetings, convened by the Town Council, on 1 November 2005 and 30 May 2006.
- 1.3 The Review is divided into a number of sections. Overall conclusions are summarised in Section Two. Section Three discusses the policy perspectives underpinning the Town Council's response to the draft AAP. Section Four describes the major concerns of the Town Council with the draft AAP. Both Sections provide context to Sections Five, Six and Seven, which, respectively, describe the alternative approach to the AAP the Town Council, with its community partners, wishes to see, pursued covering traffic relief, housing numbers and other considerations. Section Eight lists recommendations to MSDC we consider necessary to ensuring the development of a viable AAP that can earn local consensus.
- 1.4 The Review has been produced by the Town Council immediately following the second Seminar to accommodate the timetable set in its Resolution on the AAP of July 3rd 2006 and allow MSDC to consider its conclusions as urgently as possible. However, the Town Council and its community partners may submit supplementary material from the Seminars following further consideration and analysis of the Seminar output.

2. Summary Conclusions

- 2.1 We have concluded that no case is made for the current draft AAP. It is unsupported by the available legal, environmental or economic data. Nor does it consider realistic alternative options. As the recent rejections of Core Strategies at Stafford, Lichfield and South Cambridgeshire indicate the lack of this evidence base and proper consideration of realistic alternative options and clear linkage with other relevant plans cannot but fatally damage this AAP at the EIP stage.
- 2.2 We believe a new way forward is necessary for the development of the Town. This must meet the clearly expressed concerns of the Town and surrounding villages and present a soundly based case to the 2008 EIP. This alternative approach must be rooted in meeting the Town's needs, balancing the protection of its identity and character with achieving the benefits of growth and regeneration whilst still meeting the Structure Plan. Our alternative approach has six key components:
- (i) Clarification of the legal position regarding the conformity of the current transport package/relief road options with the Structure Plan and the impact of other recent EIP decisions on the MSDC AAP approach.
 - (ii) Provision of fuller traffic data, to include evaluation of south of Forest Row relief road options and all traffic relief options, such as junction improvements. Both relief road route options raise significant concerns on environmental impact, and, on the basis of information provided to date, the case for traffic and congestion relief is unproven. Assumptions behind the traffic report must be entirely transparent and open to challenge and testing.
 - (iii) Examination of alternative sites closer to Crawley to take a significant share of the proposed 4,550 houses proposed for East Grinstead, with developer contributions from those sites channelled towards addressing the Town's infrastructure needs.
 - (iv) Significantly enhanced information on the extent of infrastructure provision required to meet the population increase from housing growth.
 - (v) Linking housing growth with realistic projections of employment growth to avoid damaging increases in commuting from East Grinstead.

- (vi) Linking the Plan holistically with the Town Masterplan to ensure growth is appropriate, reflects the values underpinning the Masterplan and acts to bolster, not threaten, the Town character and identity. This is to make sure that the AAP forms part of a coherent plan for East Grinstead and surrounding villages.

3. East Grinstead Town Council 's Policy Perspective

3.1 The Town Council has followed a consistent set of Principles on the issues dealt with in the draft Area Action Plan (AAP) since the original proposal of a strategic development combined with a relief road was made in 2002. These Principles are based on the belief that any significant housing growth must : -

- bring with it all necessary infrastructure; funding for community infrastructure must not be squeezed out by the cost of a relief road;
- any "relief road" must be effective and sustainable relief road and address existing levels of congestion in the Town as a whole; no "relief road" can be acceptable if traffic in the town as a whole ends up above current levels;
- move in step with growth in local jobs and the Town's prosperity, provide affordable housing for local people and not threaten the Town's identity;
- win local consensus (in contrast to the unprecedented opposition fomented by the pre-submission consultation).

3.2 The Town Council remains committed to working for policies to promote Town Centre regeneration, address traffic congestion, provide local housing and employment and protect the Town's historic identity and quality of life.

3.3 The basis for the Town Council's conditional support in 2002 to the concept of a strategic housing development was that it would provide funding for traffic relief. Obtaining traffic relief remains a key priority. Accordingly, the Town Council supports fully the key provision in the Structure Plan that the AAP's traffic relief measures should reduce traffic in the town as a whole below 2004 levels. Relief must not be at the expense of existing residents (in terms of both proximity to housing or the aggravation of rat running), must avoid strategic gaps and minimise environmental intrusion. Traffic relief on one road in the town at the expense of others is not traffic relief.

3.4 Existing Town Council policy supports the evaluation of A22 relief road options north of Felbridge and south of Forest Row, utilising the existing road network wherever possible, including the Forest Row Parish council

proposals and the Wych Cross option via Goat crossroads. However we are increasingly concerned that despite years of opportunity, West Sussex County Council has been unable to persuade either Surrey County Council or East Sussex County Council of the benefits of such a road. Additionally, we note the widespread view that such a proposal, impacting as it would on the Forest and AONB, may not ultimately pass environmental scrutiny at EIP. This view needs to be addressed by MSDC and comprehensively resolved. If a "relief road" cannot be provided that meets the requirements of relief that are required by the Structure Plan then the answer must be not an unacceptable "relief road", but a smaller scale of development.

4. The MSDC Draft

- 4.1 The Town Council considers the draft prepared for consultation fails to meet the key policy criteria it seeks from the AAP. In specific terms, the Town Council considers that the draft AAP is unacceptable for the following reasons:
- 4.2 The AAP fails to put forward a genuine range of alternatives and fails to explain why the 2, 500 houses strategic development militates against other options raised by the public. It fails to deal holistically with the total 4,550 houses proposed, and is inadequately linked to the Town Centre Masterplan process.
- 4.3 The AAP proposals for housing growth, the Strategic Development and the estimated 2,000 other homes over 20 years - are out of scale with the Town and its needs. This proposed number is excessive and unsustainable in the view of the Town Council and the community it serves.
- 4.4 The information on infrastructure costing is totally inadequate in the face of widespread and general concern about this issue. The Town Council requires assurance from appropriate detailed and costed evidence that the provision of significant additional housing will not worsen the current acknowledged infrastructure deficit in the area. The scale of development must be adapted to the infrastructure provision available.
- 4.5 The relief road data does not allow for easy analysis of congestion relief against 2004 levels as sought by the Structure Plan. In this regard, there are major concerns in Law that none of the routes proposed meet the objectives for such relief as required by the Structure Plan. Additionally there are concerns at the marked reluctance shown by both Mid Sussex District Council and West Sussex County Council to provide necessary data to allow full independent assessment.

- 4.6 The Worth Way option significantly compromises the Thornfield Town Centre Regeneration planning, is not fully thought out, is not a true relief road, brings a road far too close to existing housing damaging the living conditions of hundreds of existing households and will worsen town centre traffic conditions. Route 3b will seriously affect the AONB without resolving all the traffic congestion issues. In particular it will worsen traffic congestion in Forest Row and cause new rat-running in East Grinstead.
- 4.7 There is no consensus for the AAP. It is opposed by the local MP and all local elected Council Members at all tiers of Local Government. It has met over 6,000 objections from the public. We understand that this is the greatest level of objection the District Council has ever received.
- 4.8 We also believe that the draft is an inadequate basis for the eventual EIP submission. This view draws on the rejection of the Lichfield, South Cambridgeshire and Stafford Core Strategies at examination.

It is becoming clear from evolving practice that a viable AAP requires

- Up to date and robust evidence base
- Proper consideration of realistic alternative options
- Clear linkage with the Community Strategy and relevant plans
- Flexibility to respond to changing circumstances

It is self evident to us, and our community partners, that these requirements are missing from the current MSDC approach. Our alternative approach seeks to ensure these requirements are delivered to ensure a viable AAP.

- 4.9 We are also concerned that the process is wrong. The new planning system envisages a Core Strategy, with other planning documents deriving from it. In this case however the preparation of the AAP in advance of the Core Strategy inherently pre-judges this course of action re East Grinstead. This concern is increased by the South Cambridgeshire outcome; we believe this suggests that an EIP would find MSDC's current approach to the AAP as both premature and unsound.
- 4.10 We note that in all the cases listed in paragraph 4.8 the Inspector rejected the Development Planning Documents even though the authorities had been working closely with their regional Government Offices. This underlines that the Inspectorate is independent and forms its views based on planning law and does not take instruction from the Government Offices.

5. The Basis of an Alternative Approach: Traffic Relief

- 5.1 It is clear that consideration of the effectiveness of the relief road necessarily underpins the acceptability, or otherwise, of any approach to the AAP. The Town Council's July 3rd 2006 Submission proposed that MSDC sought its own independent legal opinion on the issues raised by leading planning lawyer, Richard Phillips QC. We regret that the District Council has not done this. *This issue needs resolution as this is, the Town Council believes, a key prerequisite to further consideration of the Area Action Plan: the question of the legality of some aspects of the current draft must be resolved now*
- 5.2 Thus the Town Council again urges Mid Sussex District Council to take independent Legal Opinion on the provisions in the Structure Plan regarding the review of the proposed Strategic Development required by the Structure Plan, if relief to congestion significantly below current levels cannot be proved.
- 5.3 As part of this process, the Town Council also believes that it is necessary for a conclusive view to be taken on whether a relief road through the AONB is legally sustainable.
- 5.4 We still consider that A22 relief road options north of Felbridge and south of Forest Row, utilising the existing road network wherever possible, including the Forest Row Parish council proposals and the Wych Cross option via Goat crossroads, must be fully evaluated. Failure to consider adequately a route south of Forest Row results in worsening the problem of A22 congestion into the village and thereby rendering the relief road concept invalid.
- 5.5 The Town Council continues to advocate full evaluation of south of Forest Row options. This is in full knowledge of the legal issues referred to in 5.2 and 5.3 and continuing opposition of East Sussex County Council to any East Grinstead relief road that increases traffic in Forest Row over 5% or impinges on Ashdown Forest. We consider that the issue needs to be resolved comprehensively with proper public consultation on the south of Forest Row options. We consider that this is essential if the AAP is to comply with all legislation and avoid failure at EiP.
- 5.6 The Town Council fully understands the challenges facing any relief road option – legal, funding, environmental and the need to prove clearly effectiveness. In the light of these challenges, it considers that it is essential that all traffic relief options, such as junction improvements at known congestion hotspots, are fully explored, tested and costed.

5.7 The Town Council is concerned that any major housing development in East Grinstead, if it is not matched by commensurate employment creation in the Town will generate heavy commuting in the direction of Crawley and Gatwick bringing gridlock to the A264, congestion to the village communities of Crawley Down, Turners Hill, Felbridge, Copthorne and Furnace Wood, all of which will face an avalanche of rat-running.

6. The Basis of an Alternative Approach: Housing

6.1 The Town Council wishes to see the Area Action Plan be dictated explicitly by East Grinstead's own needs, character and separate identity as a historic town. This requires housing numbers to be set against fully researched internal criteria and not imposed as part of some wider, external agenda.

6.2 The Town Council believes the Town's circumstances and character necessitate a much lower scale of house-building in East Grinstead with any strategic house building related to the extent of employment opportunities locally. Where housing is to be built in East Grinstead it should either be within the existing built area or immediately abutting the urban fringe. This is to ensure such housing is fully integrated with the Town and that there is no adverse environmental impact on the strategic gaps or on the Area of Outstanding Natural Beauty.

6.3 The Town Council, believes that in general house building should be sited close to relevant employment opportunities: it is not East Grinstead's role to be a dormitory suburb of Crawley/Gatwick but a prosperous community in its own right. This view is underpinned by Government and Regional policies.

6.4 The Town Council is fully aware of the pressures from central Government on the County and District Councils to deliver significant new housing in Mid Sussex. It recognises that this new housing will have to be provided and any shortfall in East Grinstead will have to be met elsewhere as part of any alternative AAP approach.

6.5 The Town Council also notes that Government policy requires that development should be located so as to minimise the need to travel, and that housebuilding should be located close to centres of employment growth, such as Crawley/Gatwick in this instance. Based on the research of our Planning Consultancy we believe there are sites nearer Crawley/Gatwick but in Mid Sussex that could accommodate significant housing, allowing for a lower number in East Grinstead, as appropriate.

6.6 We are not seeking to pass the difficult housing issue on to another community. We are saying that there should be a more intellectually

coherent and evidence based approach to where the houses allocated by the Structure Plan should go. Such an approach has to have regard to a range of issues, including for example, jobs, the environment and sustainability criteria.

- 6.7 Inherent to our approach is the belief that developers of alternative sites should be asked to provide infrastructure, for example for traffic relief, for East Grinstead. This should be a key part of the MSDC negotiating strategy.

7. The Basis of an Alternative Approach: Other Considerations

- 7.1 Research on local employment from our Planning Consultant indicates that it is important to achieve an effective balance between new houses and jobs. The research the Town Council's consultant has undertaken to date confirms that there will be increased out-commuting from East Grinstead. The extent of new out-commuting to Crawley/Gatwick, generated by 4,550 new houses for East Grinstead, has been much debated, and views differ widely. The Town Council has asked its consultants to research the likely growth in jobs in East Grinstead to 2026 and the commensurate number of houses that this will require. This information will be shared with Mid Sussex District Council when available.
- 7.2 In terms of housing, we are particularly concerned to meet the requirements for more affordable housing in East Grinstead. Our research indicates however that whilst records are kept of housing want there is no credible analysis of need despite the generic use of the word in Mid Sussex Housing analyses.
- 7.3 We accept that whatever description is applied there is a clear shortfall of affordable housing in East Grinstead that needs to be addressed. There must also be assurances that East Grinstead residents will benefit from affordable homes built in East Grinstead.
- 7.4 We consider that the level of information, and assurance, so far provided on the provision of infrastructure to meet the population increase proposed in the draft AAP is totally inadequate. Infrastructure provision must be directly linked to housing growth.
- 7.5 The Town Council has sought to play a full part in consultation over Thornfield's work on Town Centre regeneration. We regard this work as key to the necessary process of ensuring the Town meets the retail challenge of Crawley and Tunbridge Wells. Therefore, we find the lack of holistic emphasis within the AAP as unhelpful: the AAP must live up to

its title and describe a Plan that takes account of all aspects of the Town's development.

8. Conclusions: Delivering the Town's Alternative Approach

8.1 The essence of the Town Council's case for an alternative approach to the AAP is that the existing draft is fatally flawed in terms of actual or potential legal, practical and environmental considerations. The Town Council is aware that its view is held by all local Members on the Town's other tiers of local government, the Town's MP and by the many representative residents associations and campaign groups that have been established as legitimate community stakeholders to fight the AAP proposals as presently constituted. These views have been endorsed by resolutions carried at public meetings held by the Town Council in November 2005 and May 2006. Therefore the Town Council is confident that the views expressed herein do have a broad support from within the wider Town community. The District Council's own consultation has confirmed that to be the case.

8.2 There are too many questions left open by the draft AAP. These questions cover the Opinion of Richard Phillip QC on the non-conformity of the AAP with the Structure Plan and the feasibility of constructing a relief road through the AONB. The Town Council believes these questions must be resolved conclusively. Consultation cannot be legitimate if Councillors and the public are left uninformed on these essential locations.

MSDC should take independent legal opinion to resolve these questions.

8.3 We raise in Section 4.8 major concerns regarding EIP decisions at Lichfield, Stafford and South Cambridgeshire. These concerns need to be addressed urgently.

MSDC should review the circumstances of these cases and publish a report analysing their relevance, or otherwise, to the circumstances pertaining in Mid Sussex on the AAP.

8.4 There is a need for significant extra work on traffic relief. Currently neither preferred relief road option provides the traffic relief required by the Structure Plan. There has been no full assessment of south of Forest Row route options, despite the support for this assessment by both the Town Council and Forest Row Parish Council. There has been no assessment of all alternatives to a relief road to provide congestion relief, such as junction improvements.

MSDC should commission further work on both its preferred route options and on south of Forest Row options. It should also commission work on identifying and evaluating all methods to achieve congestion relief. This work should be conducted openly with stakeholders involved.

- 8.5 There is no question of the level of concern in the Town at the prospect of a 45% increase in its population. MSDC needs to show that there is no fully evaluated viable alternative location(s) to East Grinstead for a significant element of the proposed new 4,550 houses that are, under current proposals, due to be built in East Grinstead by 2026.

MSDC should undertake evaluation of other sites including east of Crawley and south east of Crawley as sites potentially able to take an element of the proposed East Grinstead housing.

- 8.6 There is a need for consensus around employment and commuting impacts. The Town Council considers the level of local jobs that can be feasibility created to service housing growth should be a key factor in determining housing expansion to limit outward commuting.

MSDC should ensure consensus around employment data and use the resultant data to help establish housing need for East Grinstead without unacceptable growth of commuting.

- 8.7 MSDC need to supply much fuller costed information on the infrastructure needed and to be provided, both from developers and utilities.

MSDC should ensure information on infrastructure is provided to enable the public to have confidence that their needs will be adequately met.

- 8.8 The Town Council is very supportive of the Thornfield Town Centre Regeneration process as a key component in realizing its long-standing aspirations for significant improvements to the Town Centre.

MSDC should structure the AAP to reflect the needs of the Thornfield proposals, which are directly contradicted by the Worth Way and St Margaret's Loop proposals.

APPENDIX

Attendees at AAP Seminars

First Seminar

Councillor James Baldwin, Leader of East Grinstead Town Council (in the Chair)
Town Councillors: Stephen Barnett, Mrs Margaret Collins DL (also a West Sussex County Councillor), Ian Dixon, Bernard Gillbard, Paul Johnson, Jim Joyce-Nelson, Alan Lord, Mrs Christine Mainstone, Lee Marmara, Mrs Janette Wilson.

District Councillor: Mrs Jean Glynn

Mrs Christine Hardisty representing East Grinstead Community Partnership

Mrs Carol Weighell representing Traders of East Grinstead

Richard Lawrence representing Imberhorne Business Parks Association

Mrs Rosalind White representing Felbridge Parish Council

Don Sinclair representing Ashurstwood Parish Council

James Gardiner representing Forest Row Parish Council

Bernard Conn representing Coombe Hill Society

John Bridle representing East Grinstead Society

David Kirk representing Gardenwood Residents Committee

Bill Glenister representing the Three Counties Group

Tim Bull representing the Association of Imberhorne Residents

Jon Morton-Smith representing Paro

Andy McPherson representing Worth Way Action Group

Richard Barnby representing PRC

Ian Pearce representing Crawley Down Residents Association

Chris Rolley, Town Clerk (minutes).

Second Seminar

Councillor James Baldwin, Leader of East Grinstead Town Council (in the Chair)
Town Councillors: Stephen Barnett, Edward Belsey, Mrs Margaret Collins DL (also a West Sussex County Councillor), Bernard Gillbard, Nick Jarrett, Paul Johnson, Jim Joyce-Nelson, Alan Lord, Lee Marmara, Mrs Janette Wilson.

District Councillor: Mrs Jean Glynn

County Councillor Mrs Margaret Ball

Mrs Christine Hardisty representing East Grinstead Community Partnership

Mrs Carol Weighell representing Traders of East Grinstead

Councillor Jeremy Clarke representing Felbridge Parish Council

Councillor Mrs Jenny Forbes representing Ashurstwood Parish Council

Councillor Nigel Manger representing Forest Row Parish Council

Councillor Michael Watts representing Worth Parish Council

Bernard Conn representing Coombe Hill Society

Jack Hill representing Gardenwood Residents Co Ltd

Bill Glenister representing the Three Counties Group

Tim Bull representing the Association of Imberhorne Residents

Tony Lane representing Paro

Andy McPherson representing Worth Way Action Group

Richard Barnby representing PRC

Ian Pearce representing Crawley Down Residents Association

Chris Rolley, Town Clerk (minutes).