

MID SUSSEX CORE STRATEGY

THREE TIERS GROUP SUBMISSION FOR EAST GRINSTEAD CHAPTER

1.0 Introduction

1.1 The Core Strategy for East Grinstead has the challenge of reconciling the needs of housing and employment growth with the preservation of the Town's character and identity and preservation of its prosperity. At the same time it must address the Town's acknowledged infrastructure deficit. This deficit is most apparent in the Town's road network and is evidenced by the Town's chronic traffic congestion.

1.2 The Core Strategy can meet those challenges by offering a sustainable way forward that provides both housing and employment growth and outlines the necessary infrastructure enhancements. It needs to draw on a considerable evidence base and be rooted in significant community engagement. It needs to reflect the range of thinking on the Town's development in the years leading up to its conclusion. This latter point is stressed in the succeeding paragraphs of this section.

1.3 In September 2002 East Grinstead Town Council formed a steering group to undertake a town health check. The process involved engagement with the East Grinstead community, and resulted in the "East Grinstead Action Plan" (2003), which is reviewed and monitored annually by the Town Council. The "East Grinstead Action Plan" sets out how the community wish to see East Grinstead develop over the coming years. The action plan covers a wide range of topics and it is not possible to list all the issues covered. However, the following high priority recurring themes from the "Vision" and "Action Plan Projects" sections need to be, and are, reflected in the Core Strategy:

- * Revitalisation of the town centre in terms of shops and services as well as appearance
- * Improve access to affordable and key worker housing
- * Meet the needs and improve facilities for the old and young generations
- * Support for protection and promotion of the town's heritage
- * Transport improvements (to relieve congestion, improve public transport, parking)

1.4 In July 2006 the District Council adopted the East Grinstead Town Centre Masterplan as a Supplementary Planning Document. The overall vision of the Masterplan is:

"Living Life Well – A reinvigorated town centre that is proud of its heritage and builds sensitively upon its special character by integrating the best contemporary development to create a vibrant and successful place for the 21st century and beyond".

1.4.1 This vision will be delivered through seven strategic objectives that cover issues such as

- the integration of new development with the town's unique character;
- improvements to the accessibility of the town centre;
- the provision of safer and more attractive pedestrian and cycle routes;
- enhancements to town centre shopping and car parking provision;
- a wider mix of uses;
- improvements to the public realm; and
- development that builds on the town's special character and identity.

1.4.2 The creation of a sustainable environment is also a key objective. The Masterplan provides guidance on

- the provision of new housing and business development within the town centre;
- improving the quality of the environment, retaining the attractiveness of the town centre for shopping, leisure and recreation and as a place to live and work;
- reducing the impact of traffic in the main shopping areas; and
- safeguarding the character of the town and enhance car parking, open space and community facilities.

1.4.3 It identifies key areas that, if brought forward for development, would support the regeneration of the town centre, improve the public realm and upgrade the townscape. In particular it identifies the need to improve the link between the railway station and the town centre and provide enhanced food store provision in the town centre, enhancement that will be fully addressed by the opening of the planned new developments for Aldi and Marks and Spencers. The proposed approach is:

Core Policy 19 – East Grinstead Town Centre - to have a policy that supports the revitalisation of East Grinstead Town Centre in accordance with the vision, objectives and guidance contained within the adopted East Grinstead Town Centre Masterplan, and commits to the review of the Masterplan to adapt to changing circumstances and the planned growth of the town.

1.5 The Core Strategy should also draw upon the Vision for East Grinstead adopted by East Grinstead Town Council in 2008. This Vision make clear that a community based Core Strategy needs to reflect East Grinstead's unique sense of place, and further develop its economy and infrastructure.

'East Grinstead is a market town, which is unique because of its location, its heritage and because of its community spirit. People aspire to live and work in East Grinstead because of the opportunities that exist and because it is an attractive, inclusive and economically vibrant town. It is meeting the challenges of social, environmental and economic change and is able to provide for itself in terms of housing, jobs, shops, services and facilities. It is also attractive to visitors and continues to provide a range of services for the surrounding rural areas.'

1.6 As well as these key documents, the Core Strategy should draw upon the evidence base compiled for the East Grinstead Area Action Plan, West Sussex Structure Plan and related traffic studies and reflect the work done by the Three Tiers Group set up by East Grinstead Town Council.

1.7 This Core Strategy submission for East Grinstead first defines a context in terms of the principles that should underpin the Core Strategy and goes on to make specific proposals for transport planning, housing growth, employment and infrastructure.

2.0 **Core Strategy Context**

2.1 Mid Sussex District Council's draft Core Strategy originally proposed a total of 4,550 new units of accommodation for East Grinstead between the planned period of 2006 and 2026. This comprised a strategic development of 2,500 homes and, a further 2,050 homes to be provided on small scale housing allocation sites and by infill developments. In 2004 housing growth in East Grinstead and its constraint was established by Examination in Public (EiP) and was inextricably linked by the Town's traffic conditions and chronic congestion. Accordingly, any proposed strategic development was linked with the upfront provision of a relief road and could not proceed without such a relief road.

- 2.2 Subsequently the original thinking behind the Core Strategy was derailed by the global recession/credit crunch, the crash of the housing market and emerging European Habitats Directive for nearby Ashdown Forest. This resulted in the decision by the developers' consortium to conclude that the planned strategic development of 2,500 homes with a relief road in East Grinstead was no longer viable.
- 2.3 In the planned preparation for submission of Mid Sussex's Core Strategy the document must be justified, effective, sustainable and consistent with National policy. This requires that the chapters relating to East Grinstead must provide plans that are deliverable, flexible, affordable and meet the necessary tests of soundness on a robust and credible evidence base. Plans must also have been considered against reasonable alternatives.
- 2.4 It this regard the Core Strategy and any housing growth at East Grinstead needs to provide the resolution of local infrastructure problems, in particular providing relief to the Town's chronic traffic congestion. It needs to have broad community support, and to reflect the Local Development Scheme. It needs to comply with the Statement of Community Involvement, be subject to Sustainability Appraisal and be a spatial plan that has properly had regard to any other relevant plans, policies and strategies relating to the area. These will, include the South East Plan, and must have regard to the District Council's Community Strategy.
- 2.5 It is clear that development in East Grinstead needs to consume its own smoke in terms of infrastructure. There should be a clear and direct linkage between future developments and what is required in terms of infrastructure provision to meet the needs of the specific part of the town in which the development is based. There also needs to be consideration of the overall impact of development on the Town's current infrastructure deficit: development should not take place without the infrastructure.

3.0 **Development Principles .**

- 3.1 The previous section stressed the key relevance of traffic conditions to the consideration of East Grinstead's future development. Thus it is of fundamental importance that West Sussex County Council concluded several years ago that the A22 was already 'at capacity'. Since then there has been significant infill development in the town which has put further pressures on the road network, pressures that have not been alleviated by any significant enhancements. This means a new comprehensive traffic management scheme needs to be drawn up for East Grinstead to address its traffic and congestion issues.
- 3.2 Housing growth for East Grinstead needs to be evidence-based growth that is proportionate and sustainable, including a significant level of affordable housing. Linked to this is the need to create further employment land and clearly defined policies that provide a methodology to establish and maximise internalised employment growth, so that those persons living in the town do have jobs on their doorstep. This would accord with emerging Government guidelines.
- 3.3 The key principles underlying the proposed housing growth should ensure that development is of a scale and type that:
- respects the existing built environment and the historic nature of the town at its hub, but that does not impact adversely on strategic gaps,
 - does not adversely encroach into the areas of outstanding natural beauty and development restraint that surround the town on all sides,
 - would not damage the natural habitat of Ashdown Forest, and
 - would not result in gridlock on the Town's roads.

4.0 **Traffic Congestion Issues**

4.1 The linkage of development with East Grinstead's traffic congestion has already been stressed. Thus it is of fundamental importance that it is now recognised that no full relief road around East Grinstead is either affordable or achievable. Furthermore, such a road would adversely impact upon Ashdown Forest on grounds of increased traffic numbers and pollution thereby being unacceptable under European Legislation as set out by the Habitats Directive. Thus new thinking is necessary on ways to ease East Grinstead's traffic congestion.

4.2 Furthermore, the evidence shows that there would be a major deterioration in traffic conditions in East Grinstead by 2021 if no improvements are made to the highways network and that some internal solutions including improving key junctions can help to ease congestion delays in the Town.

4.3 The issue of housing numbers and the ability of the road network infrastructure to cope given existing congestion and the adverse impact that additional housing will have on this is clearly of critical importance. The evidence produced by MTRU (East Grinstead Town Council's transport consultant) indicates that a programme of coordinated road junction improvements along the A22 could accommodate approximately 30% of the estimated increase in traffic movements generated by the proposed 'infill' development of approximately 2000 homes. MTRU suggests that further mitigation of the increased traffic flows from this 'infill' development could be achieved by other demand management measures. However, this would be challenging. MTRU conclude that a further 'Greenfield' development, beyond the proposed 'infill' level of 2000 homes, could not proceed without 'creating additional stress on the road network' (MTRU Sept 2009 report p6 point 3 Para 1).

4.4 Thus the Core Strategy must outline the necessary road enhancements to deal with the proposed growth in East Grinstead's housing. Immediate priority must be to complete the junction improvements that were initially planned in the 1990s but, which were not undertaken on grounds of cost and as, at that time, the County Council did not consider that they would give sufficient capacity benefit. The County Council no longer takes that view and accordingly work to relieve congestion at the following key junctions on the A22 must commence as a priority. This work should be synchronised as part of a wider traffic management plan through an urban traffic control system to ease traffic flows through the Town.

- A264 (Moat Road)/A22 (London Road)/A22 (Station Road)
- Lingfield Road with London Road, including widening over the redundant railway bridge and the installation of a pedestrian walkway on the outside of the bridge parapet;
- Imberhome Lane/London Road;
- A22/A264 at Felbridge;

4.5 In addition there are two key locations where it is felt that a one-way road network would help ease congestion relief. These are as follows:

- Maypole Road and Garland Road;
- Windmill Lane/Highfield Road/onto Lingfield Road.

- 4.6 The junction improvements and one-way proposals identified above will give some congestion relief for north/south traffic on the A22 but would do little to ease the congestion for east/west traffic across East Grinstead that already exists. Proposals are required to dramatically improve the existing road network to help achieve this. Clearly the costs of any enhanced road network, including some new build sections would require some housing to provide the necessary infrastructure levy to meet the costs associated therewith and the new housing identified in paragraphs 5.1 and 5.2 will need to contribute towards these costs.
- 4.7 Coupled with work on improvements to the road network in and around East Grinstead there needs to be enhancement in public transport provision. Services are not currently providing a viable alternative to private car use. Greater investment in public transport investment is needed to ensure a more frequent and efficient service and here particular focus should be directed at incorporating East Grinstead as an extension to the Fastway scheme. It is recognised however that any modal shift arising from such investment is unlikely to be significant. However focus on public transport, walking and cycling, street scene/public realm design, smarter choices, and parking are all likely achievable either through developer contributions or as an alternative to these in respect of the transport element.

5.0 **East Grinstead Housing Proposals**

- 5.1 Existing Core policy 20 identifies the following locations for housing development in East Grinstead:

Existing commitments. *Mid Sussex District Council is asked to provide this figure although it is noted that at Core Strategy pre-submission document stage it was then stated as being 270 homes.*

The sites approved by the Inspector as small-scale housing allocations – providing for a total of 162 homes, details as follows:

- Land at the junction of Windmill Lane and London Road (35);
- Dunnings Mill Squash Club (40)
- Land south of the Old Convent, Moat Road (70);
- Land adjacent Moatfield Surgery, St Michael's Road (17).

Redevelopment opportunities in the town centre - a currently uncertain number of homes per the Thornfields/MSDC development agreement approved by MSDC Cabinet on 5 November 2008.

- 5.2 Subject to meeting infrastructure contribution criteria and planning brief requirements as set out elsewhere in this submission the following additional locations are proposed as follows:
- Holtye Road (previously identified as a reserve site by the Planning Inspector when considering small scale housing allocation sites - maximum 150 homes) – subject to access/egress not being through existing established residential areas;
 - Windmill Lane (currently Imberhorne Lower School and subject to relocation of the school onto a new single site off Imberhorne Lane – estimated 200 homes).
 - Charwoods Road Industrial Estate (up to 150 homes – refer to paragraph 6.7 below)
 - In addition to the above a number of the identified SHLAA sites will meet the suitability criteria and emerge to progress through the planning process.

- 5.3 The abandonment of the relief road, and the clear evidence analysis of West Sussex County Council, supports a maximum development ceiling in East Grinstead of 2,000 homes for the period culminating 2026, subject to satisfactory mitigation.
- 5.4 All new developments should be required to provide affordable housing in accordance with Mid Sussex District Council policies and the South East Plan. There should also be a requirement for all sites to contribute towards infrastructure costs according to a formula to be agreed as part of the revised strategic planning document governing Section 106 agreements and/or the proposed new Community Infrastructure Levy. Given the existing infrastructure deficit Members would expect the planning authority to be vigilant and robust in ensuring that developer agreements are entered into and do require financial contributions in accordance with approved policies.
- 5.5 To secure integrated and sustainable growth, developers should be required to contribute to improved infrastructure and services, including community needs, to support proposed development and remedy existing deficiencies.
- 5.6 Apart from the central Town Centre area it would be expected that most new developments would comprise family dwellings. Particular emphasis must be given to high standards of design, climate change, reasonable densities, and minimum room sizes that accord with Mid Sussex District Council planning policy requirements and that provide adequate parking to meet West Sussex County Council standards.
- 5.7 In relation to parking it is clear East Grinstead Town Centre on-street provision is now at capacity. There can be no further developments approved on the expectation that West Sussex County Council residents parking permits would be made available to the occupiers of the new units. To do otherwise would be seriously detrimental to existing residents who already experience major problems of finding parking spaces close to where they live. Accordingly it must be understood and recognised in approved planning policy that if developers expect to build new accommodation without providing any dedicated off-street parking they do so on the strict understanding that the new residents will not be eligible for on-street parking permits. The new developments are sustainable or they are not. There must be no pretence of sustainability where it clearly cannot be met.
- 5.8 All allocated sites should be subject to a full planning or development brief. It is considered that
- a proportion of these homes should be specially built to meet the needs of home workers and
 - for, say, 10% of all developments above 100 units having land specifically set aside for “self build” for first time buyers.

Mid Sussex District Council will need to set out specific policy guidance/advice on the operation of such a policy, the definition and nature of the local housing needs and the mechanisms for delivery of the affordable housing and self build elements within a supplementary planning document.

- 5.9 There is a need to ensure that where development occurs it is well planned and enhances the quality, character and amenity value of the town and surrounding countryside as a whole.

6.0 **Economic Development for East Grinstead**

- 6.1 The office market in East Grinstead is very localised and consultants foresee limited demand for further office development although this should be assessed in detail through the Part 2 review. This recommendation is accepted locally as it is clearly evidence based.
- 6.2 There should be an expansion of the existing Birches Industrial Estate. It is important that future commercial development should provide for a range of suitable sizes and types of business premises, appropriately located, including high tech and knowledge based industries. The importance of providing employment opportunities/provision for local residents to reduce the level of out-commuting is emphasised. Evidence suggests around 4 hectares should be so allocated.
- 6.3 The South East Plan makes clear that the area has a particularly high proportion of natural, environmental and other designations, which add to the quality of life and underpins a successful economy. It is desirable that East Grinstead does not rely for jobs for its new residents on Gatwick Airport or on the service industries that surround it in the greater Crawley area. This is particularly important, as whilst airport workers are encouraged to use public transport this is not currently practical from East Grinstead, and hence there is no prospect of increasing the uptake significantly. Accordingly there is a great need to create jobs within East Grinstead itself and this needs to reflect the specific skill sets of the area, the needs of existing business that may need to relocate and the importance of ensuring that zoned business/industrial areas do comprise a mix of freehold and leasehold. This will require a proactive approach from all local authorities towards the Town's economic development, which is essential to achieving the necessary growth in local jobs. In all of this it is also considered essential to have regard to strategic planning policies planned for the Gatwick Diamond.
- 6.4 It is certainly necessary to allocate new employment land in the Core Strategy, as indicated in paragraph 6.2 above, but it is not sufficient by itself. There must be a realistic strategy to attract businesses to create jobs commensurate with the increase in workers resident in East Grinstead. East Grinstead must not become a commuter satellite for the expanding hub at Gatwick.
- 6.5 The Town Centre revitalisation is viewed as one of the cornerstones of the Town's economic development as it provides the basis for a significantly better retail offer thereby underpinning the important retail sector in the Town. Furthermore, it is clear that this sector benefits from new residents working within the Town.
- 6.6 The retail sector should also be underpinned by an expanding tourism sector. Already of growing importance, tourism to the town should be boosted significantly by the extension of the Bluebell Railway to East Grinstead, expected late 2010 or soon thereafter. It is important that planning policy facilitates this. This will include support for a new station and for an enhanced gateway and approach to the town through Railway Approach to attract Bluebell visitors to use the Town Centre. It will also require careful planning of infrastructure related issues by the local planning authority such as car parking that are not currently available, or easily provided for, in the locality. East Grinstead's historic centre combined with its location close to Gatwick Airport and convenience for Ashdown Forest and the High Weald creates a unique opportunity for becoming the gateway to the surrounding countryside and its heritage.
- 6.7 Land at Charlwoods Road Industrial Estate should be retained as a policy aspiration within the revised Core Strategy for housing development.

7.0 Infrastructure

- 7.1 It is crucial that the infrastructure improvements that the town requires, including those necessary to meet the existing deficit situation is the fundamental factor determining the level of future house building activity. This needs to cover the full gamut of services including the road network, leisure, community, culture and education, as detailed below in section 7.3.
- 7.2 it is also essential that adequate utility infrastructure is provided - in particular to the needs for water and sewage infrastructure to service development for the town and to avoid unacceptable impacts on the environment and the amenity of existing users. It is understood that the present Felbridge STW is at or near capacity and improvements necessary are stated as requiring investment of £4,000 per additional unit. It is essential therefore, that the appropriate assessments are completed and improvements made to to upgrade capacity to meet "all" growth.
- 7.3 At a local community level, infrastructure enhancements required will include:
- New allotment facilities as a short/medium term priority.
 - A new cemetery site towards the end of the Plan period.
 - Better day care facilities for the growing elderly population, confirming the action plan requirement first identified in the 2003 Town Health Check and the subsequent commitment of the Town Council, supported by Mid Sussex District Council, to prioritise a future affordable solution.
 - More strategically, solutions to address traffic congestion, which have been referred to previously in this document, including enhancements to the roads network, public transport, cycling, smarter choices and parking management.
 - Leisure facilities (indoor and outdoor) as identified through the emerging Mid Sussex Leisure Strategy.
 - Community facilities, including further performance/rehearsal space at Chequer Mead Community Arts Centre.
 - Public realm enhancements, including as priority enhancements to Railway Approach to improve the street scene between the Town Centre and East Grinstead Railway Stations for Network Rail and the Bluebell.

Document Ends

IMPORTANT POSTSCRIPT

This is the submission of the Three Tiers Group, which was established by East Grinstead Town Council, working in partnership with the principal authorities. The submission was agreed at a meeting held at East Court on 5 October 2009. The Group comprises representatives of East Grinstead Town Council, Mid Sussex District Council and West Sussex County Council and is all party. This is not the submission of East Grinstead Town Council who are due to determine their official response at a Council meeting on 27 October 2009 following an open public meeting on 20 October 2009.

CJR/Three Tiers Group Core Strategy Response – 5 October 2009