



East Grinstead Town Council

Response to the Mid Sussex District Plan Consultation Draft

11/01/2012

Mid Sussex District Plan Consultation

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

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

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

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

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

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

General Observations

The consultation Draft District Plan document sets out briefly;

- the background to the consultation to the draft District Plan
- the Vision and Objectives
- the Overall Strategy
- the various Policies of the District Plan which will need to be reflected in Neighbourhood Plans

The document is itself attractive, laid out well and easy to read. Many of the policies are in general terms, some lacking detail and others in need of clarification. It would be expected that the final document will address these points.

The District Plan Incorporates all of the Topics/Issues included in Greg Clark’s Media Summary of the National Planning Policy Framework.

It supports the main thrust of the Localism Bill which gives local people more ownership and control of Planning in their Area

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

It supports the presumption in favour of Sustainable Development and reaffirms that “Nimbyism” is not an Option.

It states that the role of the District Plan is to provide overall direction on what, where, when and how development will take place over the next 20 years.

It affirms that Neighbourhood Plans must be evidenced based and conform to the District Plan which provides its framework.

The Neighbourhood Plan is a “stand-alone” document, empowered by the Localism Act 2011 and will not form part of the District Plan

Strategic Objectives

These appear to be in line with the Draft National Planning Policy Framework objectives and are as such acceptable. The view is that some of the policies do not sit comfortably with the strategic objectives they are linked to.

For example DP29 Listed Buildings, this policy is being underpinned by Strategic Objectives 2 & 3 does not fit well. Mid Sussex has a wealth of history which is reflected in the large number of listed buildings across the district, especially within East Grinstead. Consideration should be given re-word one of the Strategic Objectives under '*Protecting and Enhancing the Environment*' or add one dealing specifically with Listed buildings, reflecting their importance to our communities.

Policies

P1- Economic Development

Supportive of the Strategic objectives of the MSDC Draft Plan for promoting economic vitality. DP1 highlights two of the strategic objectives (6 & 7) below which are of particular interest to East Grinstead.

- To promote a place which is attractive to business, and where local enterprise thrives (SO6)
- To provide opportunities for people to live and work within their communities, reducing the need for commuting. (SO7)

It identifies the need for towns such as ours to support, encourage & increase employment opportunities for our residents to work within their own communities. This is something we will be looking to develop through our Neighbourhood Plan along with the appropriate infrastructure to support business growth.

The importance of High Speed Broadband in developing business within the town and into the 21st Century and across Mid Sussex cannot be underestimated, this has identified within

DP1 and it is something we would support and drive. East Grinstead is fortunate to be one of the first towns in Mid Sussex to have just been linked to BT Infinity high speed broadband which should now be available to most residents and businesses. It will be 12 months before other broadband providers will be able to offer this service in the town.

Supporting existing businesses and allowing them room to grow, is also something that is important and the need to identify high quality development land to meet our current and future needs. In East Grinstead this may also mean making better use of existing business sites, either through redevelopment, refurbishment or even change of use.

It is recognised that much of the town's workforce commutes each day to London, Gatwick, Crawley or other such large scale employment areas. Part of the need to do this is reflected by the high cost of housing within towns such as ours, where workers travel to receive higher remuneration than would be attained locally to meet these costs. Consideration need to be given to the provision of affordable homes within the Towns to allow workers to live and work within their own communities.

DP 2 – Retail Development

Agree in principle to the direction of the MSDC strategy within the Draft District Plan and how it is linked in with Neighbourhood Plans and the relevant Town Centre Master Plans. A recent survey has indicated that regenerating the Town Centre is greatly important to the residents. This must be a significant input in to retail development policies.

DP3- Location and Delivery of Housing Development

Mid Sussex District has determined an overall requirement of 10,600 houses over the next 20 years of which:-

- 4,300 are already committed in the planning process
- Which approximately 750 are within East Grinstead
- Burgess Hill has indicated it would be willing to take a further 3,500 – 4,000
- Leaving a balance of 2,300- 2,800 to be sited elsewhere in the District including East Grinstead.

East Grinstead is in the process of determining it's own 'Housing Needs Assessment' as part of it's Neighbourhood Plan process and may take some weeks in formulating this. MSDC in it's District Plan has not allocated additional housing targets but are awaiting proposals from the towns and villages.

It has been identified that East Grinstead in particular has several issues that will impact and indeed may constrain development (Structure Plan 2006)

- **Ashdown Forest** - Ashdown Forest Special Protection Area and Special Area of Conservation (European designations). Its proximity means that a 'Habitats Regulations Assessment' is required by legislation, and must determine whether or not the Mid Sussex District Plan will adversely affect the integrity of Ashdown Forest. East Grinstead is within the Ashdown Forest 7km buffer zone and any new development will have to take this into account, as recreational disturbance and atmospheric pollution could have an impact on the Ashdown Forest and mitigation may be required. By its own admission MSDC has made clear additional work is required urgently to inform the mitigation within the area of influence (buffer zone) . At this point it is not clear what, if any, new development in East Grinstead would trigger the need for Suitable Alternative Natural Green Space (SANGs) to be provided. Clarity and direction is required on this matter as it is an important requirement of our and others emerging Neighbourhood Plan. *(Also dealt with under DP12 and DP33)*

- **Protection of Areas of Outstanding Natural Beauty (ANOB).** East Grinstead is fortunate enough to set in some of the County's most attractive countryside, much of which has been designated as ANOB. The MSDC Draft plan highlights in its Strategic Objective 3 under Protecting and Enhancing the Environment the need to protect valued landscapes for their visual, historical and biodiversity qualities, which we agree with. This will restrict the land that would be available for development within East Grinstead.
- **Need to avoid Coalescence** between East Grinstead and outlying towns and villages, to retain individual identity of settlements.(Also dealt with within DP8) This again has been highlighted in *MSDC Strategic Objective 2 (SP2). To promote well located and designed development that reflects our distinctive towns and villages, retains their separate identity and character and prevents coalescence.* East Grinstead has several villages that surround it, each with their own individual characters such as Crawley Down, Ashurst Wood, West Hoathley, Sharpthorne and Forest Row . We also have the large and expanding town of Crawley just to our West. Any developments outside East Grinstead's urban boundary would have a direct impact on these and could see them gradually being merged (coalescence) into our urban scene and go against SP 2. This again restricts land that would be available for development.
- **Borders with East Sussex and Surrey.** East Grinstead's location at the North East corner of West and Mid Sussex with direct borders with East Sussex and Surrey again restricts land that would be available to us as a town for new development.
- **Highway and Public Transport infrastructure deficits.** East Grinstead rail services only allows travel North to Croydon and London, so the only link we have with the rest of Mid Sussex and West Sussex as a whole is an infrequent bus service. This means that a large proportion of residents have to use their cars to get work, shop or leisure activities, which has caused the A22 and A264 to become congested. A study is currently underway as to design junction improvements to five key junctions along the A22 London Road, if it is indeed possible. The results of this will no doubt impact on any future proposed developments within East Grinstead. Any improvements are likely to be very expensive to undertake and an understanding of how these would be paid for is necessary, and need to be taken into consideration by MSDC. These results will not be out before the middle of February 2012 at the earliest. West Sussex County Council is currently in the process of reviewing and reducing the subsidies it pays for non commercial bus routes across the whole of the county. Several such bus routes feed East Grinstead and any reductions to subsidies on these routes could impact on our infrastructure deficits.

DP4 - General Principles for Strategic Development at Burgess Hill

This appears to follow the plans contained within the Burgess Hill Town Wide Strategy and does not affect East Grinstead at this moment. That would change if the large strategic development that is proposed here is not adopted/taken forward for any reason. It would raise serious concerns on how it would impact on the District Plan housing delivery, and the requirements of the National Planning Policy Framework growth agenda..

DP5 - Strategic allocation to the east of Burgess Hill at Kings Way

Again this appears to follow the plans contained within the Burgess Hill Town wide Strategy and does not directly affect East Grinstead at this moment. We would again like to reiterate the concerns raised previously with DP4.

DP6 - Strategic allocation to the north and northwest of Burgess Hill

Again this appears to follow the plans contained within the Burgess Hill Town wide Strategy and does not directly affect East Grinstead at this moment. We would again like to reiterate the concerns raised previously with DP4.

DP7 - Protection and enhancement of countryside

MSDC Plan highlights the need to protect valued landscapes for their visual, historical and biodiversity qualities under Strategic Objective 3, which is something we would support. The plan also recognises that certain types of development can only occur where it is necessary to positively contribute to the rural economy, along with having to conform with certain criteria listed in DP7 that would apply before allowing any development. It defines the countryside as areas outside the built up area boundaries (urban boundaries) which is useful. The plan does recognise the need to balance protection along with the need to ensure the vitality of the rural economy and again this is something we would support. In East Grinstead we also have to give due account to DP12 and the Ashdown Forest Special Area of Conservation and Special Protection Area.

There is no reference within the DP that deals directly with our open green spaces within our urban boundaries, their importance and the need to retain them where possible.

DP8 - Preventing Coalescence

We have already touched on this point when looking at DP3 above and we would like to reiterate the points raised there. We would support the policies in DP8 where it wants to prevent coalescence and maintain *existing* gaps (East Grinstead in particular) that are identified in local Neighbourhood Plans or already part of planning documents to prevent the loss of the separate identity of nearby settlements.

DP9 - Sustainable rural development and the rural economy

Again many of the issues here are touched on in DP7, but it does give greater clarity as to what types of development would be allowed and the conditions that would have to be met. The conditions are quite specific and we would support the approach taken in the plan and the need for not conflicting with policies in DP7 and DP12.

DP10 - New homes in the countryside

When we look at what is proposed in DP10 below it lacks sufficient detail any real clarity.

To have a policy that:

- *Allows new homes in the countryside only where special justification exists.*
- *Defines special justification as:*
- *Where accommodation is required to enable agricultural, forestry and certain other full time workers to live at, or in the immediate vicinity of, their place of work; or*
- *Where the design of the dwelling is of exceptional quality or is innovative in nature.*
- *Defines new 'granny annexes' that are physically separate to the dwelling as a new home, and therefore subject to the same special justification as above.*

If we look at The National Planning Policy Framework (NPPF Draft) 112 & 113 below it takes a slightly different viewpoint but does have increased clarity, the type of which will need to be included in DP10.

112. In rural areas, local planning authorities should be responsive to local circumstances and plan housing development to reflect local requirements, particularly for affordable housing. Local planning authorities should in particular consider whether allowing some market housing would facilitate the provision of significant additional affordable housing to meet local needs. To promote sustainable development, housing in rural areas should not be located in places distant from local services.

113. However, local planning authorities should avoid isolated homes in the countryside unless there are special circumstances such as:

- *the essential need for a rural worker to live permanently at or near their place of work in the countryside; or*
- *where development would ensure the future of buildings of special architectural or historic interest; or*
- *where the development would re-use redundant or disused buildings and lead to an enhancement to the immediate setting; or*
- *the exceptional quality or the innovative nature of the design of the dwelling. Such a design should:*
 - a. *be truly outstanding or innovative, helping to raise standards of design more generally in rural areas*
 - b. *reflect the highest standards in architecture (contd)*
 - c. *significantly enhance its immediate setting; and*
 - d. *be sensitive to the defining characteristics of the local area.*

We recognise the approach that DP10 is taking but suggest a more robust clear approach in line with the NPPF as shown above

DP11 - High Weald Area of Outstanding Natural Beauty

Support the principle the policy outlined in DP11.

DP12 - Ashdown Forest Special Area of Conservation and Special Protection Area

The policy set out by MSDC in their plan is of particular interest to East Grinstead as we fall within the 7km buffer zone and the need to provide Suitable Alternative Natural Green Space (SANGS) and an Access Management Strategy that reduces the impact of visitors on special interest features of the designated site. DP12 is not clear how this will effect new development within the 7km buffer zone and when and how this would come into effect. I/we have touched on this point in our comments on DP3. DP12 needs to be more specific as this will have a strong bearing on the East Grinstead Neighbour Plan and that of other villages, parishes within the 7km buffer zone.

DP13 - South Downs National Park

Support in principle the broad brush policy set out in DP13, supported by Strategic Objective 3 and the need protect valued landscapes for their visual, historical and biodiversity qualities. It is unclear what the fallback position would be of the District Plan if a joint plan was not progressed and how it would effect the rest of the district in respect of delivering the housing growth agenda outlined in the Draft National Planning Policy Framework.

DP14 - Setting of the South Downs National Park

Once again would support in principle the broad brush policy set out in DP13, supported by Strategic Objective 3 and the need protect valued landscapes for their visual, historical and biodiversity qualities

DP15 – Tourism

This is a policy that again has a strong bearing on East Grinstead, with the coming soon of the opening of the Bluebell Railway extension and with many of our farmers look to diversify how they use their land and buildings. With East Grinstead being one of the main visitor/tourist destinations within Mid Sussex, tourism it is an important commercial driver in ensuring the ongoing viability of the town and our rural economy.

Again would support in principle the policies laid out in DP15 which should link in with DP7 and DP9, supported by the Strategic Objectives 9 and 10.

DP16 – Securing Infrastructure

Agree with the Strategic Objectives 5 which underpins DP16 *To ensure that development is accompanied by the necessary infrastructure in the right place at the right time that meets needs, supports development and creates sustainable communities.*

Again DP16 sets out with the intention of having a policy that permits development if the **infrastructure** is already in place or can be provided in a timely manner through developer-funded contributions. The inclusion of the words in DP16 '*including Green Infrastructure*' to emphasis its importance rather than just infrastructure would be helpful as shown below.

'Any necessary infrastructure, including green infrastructure, needed to support the proposed development and contribute to sustainable communities exists, or can be provided in a timely manner, through developer-funded contributions.'

In principle this is something we would support. This will be challenging though as many infrastructure improvements may well require more developments to contribute to them due to cost, and therefore having the infrastructure provided in a timely manner will need clarification as to what timely actually means within this policy.

Agree with DP16 in the principle that the Community Infrastructure Levy will normally be spent in the *locality* of the scheme that generated it. This is where the setting of the right level of Community Infrastructure Levy (CIL) is important, especially for a town such as East Grinstead, that needs challenging infrastructure improvements. Clarity is also required as to what exactly *locality* means within DP16. Would expect it to mean within direct neighbourhood/town of such developments.

DP 17 - Transport

Again strategic objective 5 of the plan underpins DP17 which is very important for our towns especially East Grinstead, where we have serious issues with congested roads such as the A22 and A264, poor rail, public transport, cycle and other links to the rest of Mid Sussex. The whole matter of sustainable transport needs to be looked carefully within East Grinstead with new developments and how we would;

- facilitate and promote the use of alternative modes of transport to the private car, such as walking, cycling and public transport as shown in DP17.
- Not to cause an unacceptable impact in terms of road safety and increased traffic congestion.

Reiterate and point you to the comments which made in DP3 under Highway and Public Transport infrastructure deficits. These issues will also be addressed in the East Grinstead Neighbourhood Plan which will link with the MSDC District Plan.

Agree in principle with what the policies in DP17 are looking to achieve and it will be interesting to see how these can be delivered.

DP18 - Rights of Way and other recreational routes

This is an important policy matter especially when we are looking to promote sustainable transport, reduce carbon emissions and encourage a healthier lifestyle. In principle would agree with the outline policy within DP18.

DP19 - Communication Infrastructure

Looking to build for the future everyone would agree the importance of the provision of high speed broadband connections and the expansion of electronic communication networks for jobs, business success and how they can improve our local economies.

Would agree the aim of DP19, but it should not put unnecessary obstacles where new sites are required, the policy should encourage expansion. Agree with having to give the design and appearance of new structures careful consideration.

DP20 - Leisure and Cultural Facilities and Activities

The policies that are being developed here are very important for the enjoyment and well being of our communities and underpinned by Strategic Objective 14.

For example locally;

- East Grinstead currently has a shortage of various sports pitches and leisure facilities which we will strive to improve and will be looked at through the Neighbourhood Plan.

- Also high on our local agenda are Improvements to the Chequer Mead Community and Arts Centre and the East Grinstead Museum that will benefit our community as a whole.

Support the general direction policies under DP20 are being taken.

DP21 - Community Facilities and Local Services

There is not much detail here and we would like to see more information especially on how this policy and the provision of community facilities and local services could be delivered.

DP21 is also shown to be underpinned by Strategic Objective 12; to provide the amount and type of housing that meets the needs of all sectors of the community.

In the draft there is no mention on how the policies within DP21 link in with this strategic objective, if it does then it is not apparent. Needs some clarification on this point.

DP22 - Character and Design

Given the historical significance of East Grinstead, its architectural heritage and the outstanding natural beauty of much of our surrounding countryside, the character and design of developments and extensions are important. The direction the DP22 policy appears to be taking, linking in with Strategic Objectives 2 and 13. Would support in principle.

DP23 – Accessibility

Looking at the need to create environments that are accessible to all members of the community is so important to our communities as a whole, as well as for the elderly and those with disabilities. Again this is something that Neighbourhood plans will also be looking to address. The direction the DP23 policy is taking, linking in with Strategic Objectives 13, would support in principle.

DP24 - Noise, air and light pollution

Would support the formulation of a policy that protects the environment and the quality of people's life from unacceptable levels of noise, light and air pollution.

DP25 - Housing Mix

This is a difficult area to address and the importance of fully understanding the housing needs now and for the future. The Strategic Objectives 11 and 12 that this policy looks to address, i.e. developing sustainable communities which are safe, healthy, inclusive and providing the amount and type of housing that meets the needs of all sectors of the communities are fine.

Each town, village or parish will each have different needs and priorities and this should be reflected when formulating policy DP25.

Agree that it is essential that proper account should be taken by DP25 of the various Neighbourhood plans as one size does not fit all.

DP26 - Affordable housing

In most communities the need for the provision of affordable homes is a considerable factor and is something that will feature strongly in the developing Neighbourhood Plans. Due to ever increasing popularity of Mid Sussex as a place to live, we have seen house prices and rental costs spiral out of the reach of many of our own young people and families driving them away to less expensive areas. To counteract this and keep communities together, emphasis has to be given of providing affordable homes of mixed tenure to address our housing needs. DP26 sets the ratio of 30% for affordable homes as part of new developments. This is a figure that strikes the right balance between the need for to ensure the viability of the development itself. Would support the other proposed guidelines set out in this policy.

DP27- Rural Exception sites

Rural Exception sites have provided many councils with the ability to address acute housing needs within their own communities, working with partners to provide affordable homes and restricted to those with a genuine local identifiable need. These policy proposals help address and support this issue and offer reassurance to other residents within their communities.

Although these are exception sites due consideration still has to be given, certainly in the case of East Grinstead, to DP12 Ashdown Forest Special Area of Conservation and Special Protection Area and DP7.

DP28 - Gypsies and Travellers

Developing a clear policy within the district plan on Gypsies and Travellers accommodation, will help inform and reassure the community as whole.

DP29 - Listed Buildings and other buildings of merit

DP29 lacks any real detail in which to comment on at this stage. We would like to emphasis how important it is to have a clear policy on this subject in order to preserve our architectural heritage. In East Grinstead we are indeed fortunate to have a large number of listed buildings both within the town centre and surrounding countryside.

We recognise that each building will be different both in architectural merit and of historical significance, so the policy needs to be flexible enough to recognise this fact along with the needs of the occupants.

We are unsure if the Strategic Objectives 2 and 3 that are shown as underpinning DP29 do in fact sit comfortably here. It may be worth considering creating another Strategic Objective that deals specifically with this subject, as it is of such significance within Mid Sussex and East Grinstead specifically.

DP30 - Conservation Areas

It is right that special consideration is given to conservation areas and the need for a sensitive approach to the design and nature of any new development. Especially within East Grinstead where a large section of the town centre has been designated a conservation area. Would agree in general terms to the principles the policy will be framed around, but DP30 is lacking any real detail at this stage.

DP31 - Historic Parks and Gardens

No detail here as to what historic parks and gardens are within Mid Sussex to which this policy would apply to. More information required.

DP32 - Archaeological sites

Would support a policy that protects and enhances sites of archaeological interest. When these proposals are formulated and the details emerge we will be able to comment further.

DP33 - Biodiversity/protection of natural habitats

It is right and proper that we should look to protect our own biodiversity and natural habitats where we can. Green Infrastructure or 'green multi-functional networks' as referred to in the DP is an important consideration when dealing with all new developments and we should also be looking to improve existing green infrastructure where possible. Would support the aims and aspirations of this policy.

DP34 - Sustainable Resources

This policy is looking to set a high (BREEAM rating Very Good) standard in sustainable building design for New Homes and non residential buildings from the outset then rising to

BREEAM rating Excellent from 2016. This is a positive way of moving towards a low carbon economy in line with the National Planning Policy Framework (Draft) objectives.

BREEAM sets the standard for best practice in sustainable building design, construction and operation and has become one of the most comprehensive and widely recognised measures of a building's environmental performance. Ratings are as follows;

- Pass 30%
- Good 45%,
- Very good 55%
- Excellent 70%
- Outstanding 85%

DP35 - Renewable Energy in New developments

As part of the strategic objective of promoting sustainable development what is proposed in DP35 is interesting and would support in principle.

DP36 - Renewable Energy Schemes

Again as with DP35, as part of the strategic objective of promoting sustainable development, what is proposed in DP36 to have a policy that supports large and small-scale renewable energy schemes where it is considered these will not have a significant detrimental impact on the environment and is in accordance with other policies. Would again in principle support the development of such a policy.

DP37 - Flood Risk

We have all seen across the country recent examples of flooding and the damage and disruption it causes. The increased risk of such events as a result of climate change is well documented as in the *PITT Flood Report*. We believe it essential that a robust policy is developed on a local level that addresses this issue when considering location and impact of new developments to reduce the risks of flooding. Would support in principle the development of such a policy as outlined in DP37.

DP38 - Water Infrastructure and the Water Environment

This is a sensible proposition and does link in well with DP37. Would support the policy proposals as outlined in DP38

Conclusion

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

The Town Council has not offered any comment on the sustainability appraisal as we have no expertise in this field and do not feel it appropriate to make comment on the conclusions of the professional officers.