

THE EAST GRINSTEAD SOCIETY

Charity No 257870

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Mrs Julie Holden ✓
Town Clerk
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28th November 2011

Dear Julie

NEIGHBOURHOOD PLAN

1. Thank you for inviting the East Grinstead Society to contribute to the town's Neighbourhood Plan. Earlier this year we started thinking about the town's future and the attached "TOWARDS A LONG TERM NEIGHBOURHOOD PLAN FOR EAST GRINSTEAD" is the result, prepared by Society members and others.

Vision

2. Put simply the Society's vision for the town is to improve its attraction as a base for tourists, through its unique position in the north of the county, through its High Street buildings and its interesting history, keeping its market town 'feel' as a place where people like to live and visit. At the same time it is essential that existing businesses are encouraged to remain here and new businesses to come. Town centre regeneration, reduced traffic congestion and sufficient parking are necessary objectives to achieve and maintain this vision. We believe our town has no need to expand its housing stock significantly. The future lies in maintaining and improving the quality of what we have based on the town's ambience and unique character. What distinguishes EG from the rest of the area needs emphasis if we are to keep ahead of other places in the district.

Planning background

3. It may be helpful to remind ourselves of the major planning events in recent years. In 2002 MSDC were required to implement central government housing targets by way of the WSCC Structure Plan for a strategic location of 2500 houses in the Imberhorne area based upon a relief road. In 2004 a

District Plan was adopted with a Local Plan for EG which said there are constraints on future development largely because of road congestion. From 2006 an EG Area Action Plan based on the 2500/relief road concept, a similar Core Strategy for the district and a South East Plan reflecting similar thinking were produced and eventually abandoned. Local Plan policies designed to protect the town from inappropriate development were 'saved' in September 2007 following a District application under the Planning and Compulsory Purchase Act 2004. Planning officers have abandoned important 'saved' policies from the 2004 District Plan which we think should reappear in a 2012 version in order to reflect the government's approach to local planning. The saved policies in the draft District Plan are not sufficient to protect EG from inappropriate development.

4. Constraints on housing development thought important in 2004 are just as relevant today because no road improvements have been made since. We suggest that Local Plan key paragraphs 12.1 to 12.7, or new ones expressing the same sentiments, are put into the Neighbourhood Plan, and thence the District Plan, to achieve local control of when and where developments are placed, and how big and for what purpose. As things stand the town is vulnerable to unsustainable development including development the town sees no merit or benefit from.

Housing in East Grinstead

5. The draft NPPF expresses a presumption in favour of sustainable development but 'sustainable' is not defined. In the meantime the District Council has proposed an overall housing requirement of 10,600 new homes in the 20 years to 2031: comprising 4300 already committed, 3500-4000 at a Burgess Hill strategic location, and 2300-2800 from elsewhere. The 'already committed' total from small-scale housing allocations and existing permissions came about under previous planning arrangements that did not take into account East Grinstead's significant infrastructure deficit. The Neighbourhood Plan provides an opportunity to put this right.

6. The draft District Plan Chapter 6, Appraisal, page 41, rules out major housing at East Grinstead and Crabbet Park but concerns remain that more houses than the town could take may in the future be proposed to contribute towards the 'from elsewhere' total. A strategic location at Crabbet Park should at least be considered as a possibility since surely there would be time for water supply planning in the latter part of the 20 year plan.

7. The attached PLAN FOR EAST GRINSTEAD indicates that protection from unsatisfactory development should be achieved by saying in the Neighbourhood

Plan just what building would be acceptable and what would not. We think the former should include affordable homes on brownfield sites for people with jobs here; building not acceptable would be those the District Plan excludes in line with the Neighbourhood Plan, including a list of the town's green spaces, for example the King George V playing field, Brooklands Park the open space off Turners Hill Road and others.

Habitats Regulations

8. In our comments to MSDC it is likely we will refer to the effects EU Habitats Regulations can have on housing in the vicinity of Ashdown Forest. A substantive document titled "**Comments on UE Associates October 2011 Habitats Regulations Assessment for Mid Sussex District Plan.**" was prepared by colleagues here. It refutes MSDC's opinion that housing around Ashdown Forest does not affect air and other pollution levels. East Grinstead is within the 7km area of concern and in our view its findings should be registered in the Neighbourhood Plan.

Traffic congestion.

9. The Neighbourhood Plan should also address traffic congestion and its affect on the capacity of the town for housing. A specification and costs study into possible improvements at 5 junctions in the town is expected to report in 2012. **A PRC summary of advice given by Atkins and MTRU in September 2009** at a meeting held at East Court indicated, inter alia, that unless and until the current road junction improvements are effected the roads cannot take any more houses.

10. In conclusion may I thank you again for this opportunity to express our ideas for the future of East Grinstead. If it would help we would be pleased to discuss and elaborate.

Yours sincerely

A handwritten signature in black ink, appearing to read 'John Bridle', written in a cursive style.

John Bridle
Chairman

TOWARDS A NEW LONG TERM NEIGHBOURHOOD PLAN FOR EAST GRINSTEAD

1. Introduction

East Grinstead Town Council has invited local organisations to contribute ideas to the new neighbourhood plan that has started to develop as part of developing Local Plans for Mid Sussex. The neighbourhood plan will ultimately shape and direct the town's future for the next 20 years, and beyond, as a thriving community where people are happy to live, work, bring up their families, and which outsiders are keen to visit and enjoy. Community buy-in to the plan is essential to its success, and extensive public involvement in its development is therefore key to that buy-in.

The Town is, inevitably, in competition with other local towns, not all of them in Mid Sussex, to attract both resources and businesses. Its vision needs to identify what is and will be different about East Grinstead, and what resources it needs to trumpet that distinctiveness.

In forging its own neighbourhood plan there are a number of practical constraints that will necessarily influence its content. Section 2 addresses the main constraints.

2. Practical realities affecting the scope of the vision

It is a widely touted myth that the betterment of a community necessarily depends on a growing local population and more housing. That cannot be the right way forward for East Grinstead given the infrastructure and other constraints listed below. The options for the town's future need to be addressed in that context.

Any plan for the town covering the period to 2031 will have to assume a largely stable population with only low levels of further increase from its current number (c26,000?).

There is no reason why a town of East Grinstead's current size, with a stable population base, cannot thrive and prosper on a sustainable basis. The vision must identify how best that can be achieved.

The reasons why material development is not possible were spelt out in the East Grinstead chapter of the 2004 Local Plan: namely the town's insoluble congestion problems, its proximity to so much high value AONB and greenfield countryside, and the need to avoid eroding the green corridors between East Grinstead and neighbouring conurbations. Those overriding constraints still apply and should be recorded in the neighbourhood plan as such (especially as they are not proposed in the District Plan to be saved parts of the Local Plan). Indeed paras 12.1 – 12.7 of the 2004 Local Plan contain much wisdom that is as pertinent now as when it was written.

Infrastructure constraints

No solution has ever been identified to the town's ever-worsening traffic congestion problem. The extensive (but still incomplete) traffic evidence provided to WSCC, MSDC and the Town Council by a range of experts all supports the conclusion that material further development will only make matters worse: most of the mitigation measures they identify (major modal shift away from private cars; and draconian parking restrictions) are impractical: politically unacceptable, probably ineffective and unaffordable. So, even if there was lots of money to throw at the traffic congestion problem – and there isn't – the problem remains insoluble within the time frame of the neighbourhood plan.

It follows that there is nothing to be gained by encouraging housing development for the purpose of levying contributions to funding a traffic congestion "solution". On the contrary, the evidence clearly shows that material development is unsustainable as it will exacerbate the problem, not resolve it.

The current study on the possible "5 junction" improvements offers hope of no more than modest

alleviation of traffic flows, and does not pretend to offer a long term solution to current congestion, yet alone justify encouraging more housing or cars.

Economic constraints

The town does not control the purse strings for road or any other infrastructure improvements. So it is not the sole master of its own neighbourhood plan. The plan and its effective implementation require negotiation with, and support of a number of external public authorities and bodies. The main ones and their roles could usefully be spelt out in any public consultation document.

Any neighbourhood plan will need to be realistic that funds for infrastructure improvements or other capital projects within the town will be very tight: given the national economic climate and prospects, there will be little public money available, and the Town will have to fight for its fair share of those funds. Moreover, if we take it as given that future local housing development will be restricted, the level of funds from developer levies/contributions will also be limited.

The implications of these economic constraints on any development plan for the Town require local public understanding given their importance to the Vision.

Planning constraints

The Plan will have to reflect national, as well as County and District level planning rules and expectations. For example, it will be necessary to persuade Mid Sussex District Council to reflect the limitation on the Town's housing development prospects within the District Plan on which they are working (there are no such caveats in the current draft), so that District-wide housing allocations respect that limitation. The Town will also need to talk to neighbouring authorities.

This challenge is made all the more difficult by the changes to planning laws currently envisaged by the Coalition Government and the uncertainty as to the outcome of that process which is likely to continue well into 2012, especially given the controversy over the National Planning Policy Framework with which the neighbourhood plan and District Plan will presumably have to conform.

This makes it very important that WSCC, MSDC and neighbouring parishes all buy into the Town's plan.

Sustainability and environmental constraints

Reference has been made above to the still valid conclusion in the current 2004 Local Plan that development in and around East Grinstead is inevitably constrained by both insoluble traffic congestion and the extensive AONB and greenfield countryside, as well as the need to avoid eroding the green corridors between East Grinstead and neighbouring conurbations. Much more housing and traffic in the town is simply unsustainable. For reasons on which we can elaborate, we think that it may well also be incompatible with the Habitats Directive given the proximity of EU protected habitats and bird species on Ashdown Forest.

Options to reduce car dependency by modal shift to other forms of transport are limited by the spread-out nature of the town, the narrow width of most of its roads, its topography, and by the probable absence of long term funding sources to subsidise bus services.

Beyond this, debate on the formulation of a neighbourhood plan will need to focus on the extent to which it is sensible and practical within the limitations of the Town Council's own powers to make a green future should be a key part of that plan: we will look forward to getting practical ideas and suggestions from the community.

3. The Town's Future: The main options

This section looks at the main options that could be included within the neighbourhood plan covering economic and business activity in the Town; infrastructure needs; housing and development; environmental enhancement, and attracting visitors to the Town. These issues are of course inter-dependant. Some core questions that need to be answered in the course of developing the Plan are raised.

Economic and business activity

Whilst the local unemployment level has been and remains relatively low, local business is not thriving: we have multiple office buildings that have remained unoccupied for years (many of them probably no longer lettable in practice) and the high street is struggling. Meanwhile a surprisingly high proportion of local residents travel elsewhere to work (mostly by car, at least for part of their journey, thereby exacerbating local traffic congestion).

We advocate that the neighbourhood plan should concentrate on how to get more businesses and jobs into East Grinstead, and how to attract more outside visitors into the Town. This would be consistent with the District Plan's focus (paras 3.4 – 3.5) on making the District, and the communities within it, self sufficient. East Grinstead's future cannot lie in its being a mere dormitory town for London or other parts of the Gatwick Diamond.

Equally, the Gatwick Diamond Strategy, which is being promoted as offering the opportunity for a major economic boost to the communities within it, is offering very little to East Grinstead. The Town needs to be shouting its own corner to secure more substantial and sustained benefit from this initiative, because no-one else is looking after East Grinstead's interest. The development of the neighbourhood plan provides the Town Council with an opportunity to secure commitments to specific benefits.

There is a dearth of locally based current fact and evidence around which a reliable plan can be developed (see questions below).

The consultation and evidence base to be developed needs to identify

- what the main selling points of East Grinstead will be to new/moving businesses, and whether or not it would help for the neighbourhood plan to focus on particular business sectors. The good news is that a number of businesses have moved to East Grinstead recently. What attracted them needs to be understood;
- what type of high street will offer the most attractive proposition to residents and visitors and how other similarly sized towns have achieved successful individuality;
- how to make the best of the opportunity to redevelop the Town Centre so as to suit local businesses and residents, not merely the planners and developers.

The Town is a natural centre in which tourists can base themselves for visits to the area. The opportunities extend beyond the Bluebell Railway. Tourism is already successfully promoted by and within the Town, but the underlying opportunities should be re-examined and focused on. Ditto for other activities that would encourage people to visit and spend money here.

Questions:

- Should the Council seek to influence the types of business and shops that it seeks to attract to/retain in the town. If so, what types and how?
- We need locally based facts and evidence: e.g. what number of economically active people live in East Grinstead, and the surrounding villages ? How many work in East

Grinstead, and what sort of jobs do they do? How many people commute - where to, and by what means? Is there enough information in any of these categories such that one can determine a trend over the past decade? What assumptions have the planners made in the previous Plans, on these points ?

- How much, if any, new business/industrial land is needed and where? What type of building is needed? What are the transport/traffic implications?
- What can we do to market East Grinstead as a tourist centre more effectively, and what additional attractions and facilities does the Town need in order further to improve its tourist-centred credentials.
- What other business-focused activities can the town encourage into the area e.g. a sports administration and/or sports medicine centre? An education/learning centre?
- Does the congestion problem make it sensible to seek to attract businesses that can operate using high speed broadband activity, rather than relying on physical movement of goods and labour, as a marketing edge? What public funding investment is needed to get it?
- Can we identify any material likely changes in demographics or technology that could influence decisions, given the Plan's 20 year timescale?

Infrastructure and facility needs

The Plan's priority should be to develop a realistic, prioritised list of capital projects to needed to improve the Town's needs and leisure facilities. Drawing up this list will require extensive discussion with the County and District Council, and others, to assess project costs, sources of funding, and how our own priorities will fit in with those of other communities in the County and District.

Planning authorities in and around Mid Sussex have long been unclear whether more local housing is desirable in itself to assist local economic development with the financial contributions from developers that are supposed to fund local infrastructure improvements being an incidental benefit; or whether new housing development should only be permitted and judged to be sustainable where the resulting contributions are required to fund pre-identified infrastructure projects from which the town will demonstrably derive benefit.

Given the constraints discussed above, we look for the neighbourhood plan to be clear that allowing new housing in the Town will only be permitted by MSDC where it is vital to finance a pre-agreed capital project, where the developer funds are ring-fenced for that project and there is robust evidence that the community will benefit from the project.

That will require MSDC's yet to be developed District Plan to back up the neighbourhood plan in order that there is a coherent, evidence based, planning logic underpinning the District Plan that can sustain attack in Planning Inquiry appeals. The absence from the draft District Plan of a cap on the overall level of permitted house building within the District (or parts of it) is misconceived: it risks making it far harder for MSDC to defend inappropriate future development applications even after the District Plan is adopted, and we urge the Town Council to be precise within the neighbourhood plan as to the maximum level of development that will be allowed.

We hope that the neighbourhood plan will provide for increased accountability to the community as to how levies on developers are actually spent in practice. There is little evidence available as to what benefits the Town has received from the s106 levies on developers of local sites over the last decade (a period during which permission has been granted for the building of over 1,100 new homes in East Grinstead alone). We would be interested to see of a comparison between levies raised on new development here over the last decade and the amounts spent on infrastructure improvement here in that time.

Questions:

- What are the town's own priorities in terms of its infrastructure and facilities improvement ambitions? And what are they individually and collectively expected to cost?
- How to keep facilities like Chequer Mead and Kings Leisure Centre operational and profitable?
- What assurances can the Town obtain from MSDC, WSCC and other public bodies as to the funds they will allow for infrastructure improvements in and around the Town, when, and with what caveats/conditions?
- why is the Town Council intending to argue for its own separate CIL, and why does MSDC not want to agree?

Housing Development

Given the very limited scope for new housing locally and the intense level of house building within the District that has been pushed through over the last decade despite the constraints, the priority for the Neighbourhood plan will be to assemble evidence to determine what sort of housing is most needed, and where it should go; and then to persuade developers to focus their plans to meet prioritised needs here. If one accepts the fact that traffic congestion in the town is going to get worse and there is no real prospect of it improving, this imposes a limit on new housing. A priori this means new housing should only be approved if it either addresses a demonstrable shortfall in affordable housing, or is targeted at people who come to live and work in East Grinstead –housing should not be allowed if it merely supports more people commuting away from East Grinstead to work. We realise that this may put the Town Council at odds with the District Council given that the draft District Plan does not contain a comprehensive housing allocation strategy.

Does the community accept that new housing will be an integral part of any redevelopment of the Town Centre? Should owners of empty office blocks in the town be encouraged, or discouraged, from redevelopment of their sites for housing, as the Government wants them to do - and are those sites suitable for the kinds of housing most needed here?

Please consider listing out suggested development principles for all new business and residential development, and the types of development that should be opposed as unsustainable: e.g. any uncorrelated to local employment needs and opportunities, those on greenfield sites, and any which erode the Town's boundary.

Questions:

- If we are to assume largely stable population numbers, are there any local public services that are underutilized and at risk of closure in the absence of local population growth. (QVH?/schools?) If so, what are the implications?
- Is there any evidence that business growth opportunities within the town are being hampered by housing shortages? If so, what types of housing are most needed to solve that problem?

Towards a greener town

We urge that the neighbourhood plan should insist on prioritising brownfield sites for development, and enforcement of current Town boundary lines from development (including the dropping of any strategic development along Imberhome Lane). We would like to see the neighbourhood plan express very clearly where the boundaries are so as to preclude future argument given what might be viewed as "weasel words" in MSDC's draft policy DP8 on the prevention of coalescence between communities.

We would urge the town council to consider and consult widely on other planning etc measures to ensure protection of surrounding AONB greenfield land though we are sceptical as to the appropriateness or benefits of a so called suitable alternative green space as a solution to mitigating damage to European protected sites on Ashdown Forest caused by further local development.

We hope that the Town Council will want to refer within the neighbourhood plan to building design standards and opportunities via the planning process to influence environmental efficiency of housing as well as aesthetic design standards including via development briefs such as the one for land around the Old Convent at Moat Road.

We would like to see the Town Council engage with organisations that have expertise in encouraging environmentally friendly and sustainable planning initiatives so as to maximise the opportunity for e.g. improved cycleways and public transport options; green corridors; the encouragement of local food networks; and exploring whether there is a meaningful way of linking a green agenda with the promotion of tourism here.

Postscript: There has not yet been sufficient time to consider how the individual draft District Plan objectives and policies should influence the content of East Grinstead's neighbourhood plan.