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Yr Ref:- JH/SB/3/1/6
Our Ref:-jeab111128c

28 November 2011

Mrs J Holden
Town Clerk
East Grinstead Town Council
East Court
College Lane
East Grinstead
West Sussex. RH19 3LT

Dear Mrs Holden,

Neighbourhood Plan

Thank you for your letter of 11 November inviting me to contribute as Chairman of The Old Convent Estate Residents Limited (TOCERL).

Originally, I had submitted my personal views. I had not had an opportunity to consult with my fellow directors at that time. Now, I have consulted, and indeed have their support.

Additionally, you will have received a note from Mr A McPherson who you had written to in the expectation that he would make response from the Post Referendum Campaign (PRC). Unfortunately, for family health reasons, he has been unable to continue his current work with the PRC. He asked that I should make response on their behalf.

Thank you for the additional time that you have given us to formulate our views, and I can now confirm that the PRC have given me some additional help in compiling the attached document. It is therefore amended from that which I originally tendered.

Since TOCERL are members of the PRC, it seems unnecessary to submit the document twice.

Therefore, I hope that you accept the attached "Issues in East Grinstead affecting the District Plan" as the contribution from both organisations.

We continue to say that a principal concern is that anything that goes forward to MSDC should be evidence-based, and that MSDC themselves take note of existing plans and commitments before coming forward with proposals that have been equally rigorously researched and the evidence provided along with proposals made.

Yours sincerely

John E.A. Benstead

Chairman of TOCERL and on behalf of the PRC

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Issues in East Grinstead affecting the District Plan

27 November 2011

There is currently an existing Mid Sussex Local Plan, adopted in 2004. The following are extracts and considerations that I believe remain relevant to development of the new draft District Plan that the Town Council may wish to put forward to MSDC for retention.

Context

There follow extracts from Chapter 12 of the Local Plan. *In Italics*

12.1

East Grinstead is one of the three main towns in Mid Sussex and with a population of around 25,000 is the largest settlement in the northern part of the District. It is also one of the oldest towns in the County, and its importance as a market, industrial and commercial centre dates back to medieval times. In common with other towns its character and role has evolved gradually over many centuries as economic and social circumstances have changed. Nevertheless, it retains its historic core, centred on the High Street, where many buildings date back as far as the 14th and 15th centuries.

12.2

The town is set in very attractive countryside, which extends to the edges of the built up area and which includes, to the south and east, part of the High Weald Area of Outstanding Natural Beauty. The town has been developed on a flat topped ridge which extends from Ashurst Wood in the south east to Imberhorne Lane in the west. A ridge also extends along Holtye Road to the north east, and southwards towards Saint Hill Green. These ridges are dissected by steep-sided wooded river valleys to the south of the town. This physical form has given the town a distinctive character and setting in relation to the surrounding area. It has been a major factor in shaping the nature of the past development of the town and also acts as a constraint for the future.

Unusually, the Mid Sussex Small Scale Housing Allocation (SSHA) Development Plan Document (DPD) was adopted in 2008 ahead of a Core Strategy, because the District Council's revised Local Plan was adopted in 2004 alongside the revised West Sussex County Structure Plan following Examinations in Public. In the absence of a Core Strategy most of the Local Plan policies were saved by the Secretary of State in 2007.

The Local Plan set a policy of development constraint for East Grinstead in recognition of principal constraining factors. We consider these constraining factors to be as great as or greater than was the case in 2008.

12.4

Two important constraints have affected the amount of new housing and commercial development which the town has been able to accommodate in recent years. The first constraint is environmental, reflecting the character and high visual quality of the area, and in particular the surrounding countryside.....

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12.5

The second major constraint relates to infrastructure and, in particular, roads. New highway provision at East Grinstead has not kept pace with the rate of earlier development and general traffic growth and the existing highway network is no longer adequate to cope with the traffic demands now being placed upon it. Unless significant improvements are made further large scale development would only exacerbate this situation and would not be appropriate.the existing infrastructure will continue to be a firm constraint on the amount of future development at East Grinstead in the short term, and certainly for the period covered by the new District Plan."

Highways

The Examination in Public into the SSHA took place in the expectation that the West Sussex Local Transport Plan (LTP) would be implemented. The LTP was based on the expectation that the East Grinstead Area Action Plan would deliver a Strategic Development to the west or southwest of the town (identified in the Structure Plan Policy LOC1) that was made contingent on the provision of a comprehensive transport package that would address the traffic constraints identified in the Local and Structure Plans to provide traffic relief below 2004 levels¹. However, in 2009 the District Council formally withdrew the Strategic Development scheme with its integral transport package. The Council announced that there was no prospect of delivering an East Grinstead Relief Road as envisaged in the Structure Plan.

In 2009 further transport work by Atkins considered the impact of development on the traffic network and what measures might need to be implemented to alleviate congestion to facilitate development at East Grinstead. These include improvements to the junctions along the A22, an enhanced public transport/sustainability package.²

We believe EGTC should resist any further development in East Grinstead until such time as WSCC fulfil the requirement to make these junction improvements as a minimum contribution to improving traffic flows in and around the town. It is disappointing that significant levels of new development have been given consent by MSDC in the absence of any meaningful improvement to local transport infrastructure. This affects local quality of life for most residents every day and reflects poorly on our local elected representatives.

Environmental Constraints

Initial work for the Core Strategy has established that development at East Grinstead might risk damage to the Ashdown Forest Special Protection Area (SPA) and Special Area of Conservation (SAC), which are protected under the Habitats Regulations. This preliminary work advises that the environmental impact of any development within a 7.5km "zone of influence" around the Ashdown Forest must be considered, both on its own and in combination with all other development within

¹ Policy LOC1 Development Principles for infrastructure, West Sussex County Structure Plan adopted 2004

² Atkins East Grinstead Transport Report 'Phase 2' August 2009 & MTRU Report to East Grinstead Town Council Sept 2009

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the zone on a cumulative basis. The Habitats Regulations require the Council to take a precautionary approach to development with this regard, and this could have a significant impact on the suitability of land on the edges of East Grinstead for development.

Bearing in mind the potential risk to the Ashdown Forest SPA/SAC, the Local Development Framework must be subject to an "Appropriate Assessment". It would be expected that this would be carried out for the District Plan which should then provide the spatial strategy for the Local Development Framework. To our knowledge, MSDC has not previously undertaken any Appropriate Assessment, but has now published a draft assessment as a supporting document to the draft District Plan. We urge EGTC to pay close attention to this document, to ensure that it is robust, based on sound evidence, and affords sufficient protection to the SPA and SAC.

The SSHA was not subject to an Appropriate Assessment and the Examination in Public did not consider the impact of development on the Ashdown Forest SPA/SAC, a failure in public duty that we have highlighted previously. It will be necessary to show that the cumulative effect of development within the 7.5km zone of influence since 2004, **and** that approved and awaiting application is taken into account in any assessment. At first glance, it appears that MSDC's draft assessment does not do this, instead only looking at the impacts of future development foreseen under the draft District Plan. Given the extended hiatus in the Local Development Framework in the District, and the significant development that has taken place over that time, we intend to ask MSDC why they have adopted this approach.

The Local Plan

Housing

12.6

As a result of these environmental and highway constraints, and the current uncertainties relating to future highway and transport provision the overall strategy for the future development of East Grinstead is one of restraint. It is proposed that there are only very modest amounts of new housing or business development at East Grinstead over the Plan period, with only a small number of allocated sites, mostly within or adjacent to the existing built up area. In the case of housing, five sites are allocated which together are estimated to have a capacity of up to 179 dwellings. The amount and location of this new development are considered in the following sections of this Chapter.

Since 2004, and in spite of the District Plan, substantially more development has taken place than the 179 capacity identified as result of the Local Plan Examination in Public to take account of the two principal constraints. Detail of the number of housing completions in East Grinstead available to us at the beginning of 2011, and indeed supplied by EGTC were as below. We would be pleased to have these updated by EGTC

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Development in East Grinstead	Number of units
Completions (net) 2004-2008	379
Planning Permissions Outstanding	514
Total	893

Year	Built Tributary to A264	Planning Permissions <6 units	Planning permissions 6+ units	TOTAL
2004/05	64			64
2005/06	18			18
2006/07	6			6
2007/08	35			35
2008/09	44	49	9	102
TOTAL	167	49	9	225

During the period 2008/09 to 2010/11 a number of further sites gained planning permission which will need to be taken into account when considering the cumulative impact on both the transport network and the Ashdown Forest SAC/SPA.

In particular developments at Blackwell School and the Old Gas Works have had considerable impact on the A22/A264 (eastbound) interchange. Additionally the planning applications coming forward for the Ashplats development, and the sites adjacent to Moatfield Surgery and The Old Convent will add to existing gridlock at peak periods.

These latter two sites are 147 and 70 dwellings respectively. However conditions have materially changed since this decision. At the time of approval, the adopted West Sussex Local Transport Plan estimated delivery of a Relief Road as part of a comprehensive transport package that would deliver traffic relief to below 2004 levels, as well as mitigating further traffic congestion from proposed development. Since the Inspector's report the proposed comprehensive transport package has been abandoned by the District Council because it has not been possible to deliver it.

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The PRC recently asked via a FOI to be informed of the number of affordable houses and flats that have been built each year from 2000 in the East Grinstead and the surrounding villages. In East Grinstead, the number given was 149 between 2004 and 2010. With a further 36 expected between 2011 and 2012. Additional information was that there were 738 families in East Grinstead on the Common Housing Register. These are all families that have a local connection to East Grinstead. As we understand it, these families could equally be registered in other areas where they have a local connection. Therefore, not truly a demand in East Grinstead. However, it does raise the issue of all other services and transport issues that would follow from any provision of affordable housing.

WSCC as the Highways Authority is on record as describing the A22 and A264 as 'at capacity'.

We are aware of the Traffic Assessment and update on behalf of Barratt Southern Counties in October 2011 and submitted to WSCC. Its subject is Ashplatts, but, it seems to take no account of previous transport assessments where the A264 was "at capacity", adjudged in 2004, and WSLTP.

MSDC must have regard to the saved policies, and the consequences of not delivering the comprehensive package in the Structure Plan and the planned development principles in the Local Transport Plan and EGTC need to ensure this is the case

In summary to Housing Issues, there is a need to resurrect the policy aims in Chapter 12 of the Local Plan that provided a context for policy EG1 (a saved policy in the draft District Plan). The development constraints prevailing when the Local Plan was adopted in 2004 are far worse now than they were then, with site allocations or planning permissions granted for more than ten times the scale of development thought prudent at that time (179 dwellings).

We would urge against MSDC pre-determining the outcome of the District Plan as it did with the Core Strategy. It needs to ensure genuine public consultation such that it has been inclusive with local proposals, and incorporates them, and if not doing so gives good valid reasons based on evidence.

By ensuring participation through consultation with all interested parties, MSDC will be minimising future objections to a District Plan. MSDC have now passed the Draft Statement of Community Involvement for publication, and MSDC need to be monitored by the Town Council to see that issues relating to consultation and involvement are indeed observed. We invite the Town Council to ensure that issues of public interest are circulated to all local interested parties and stakeholders, ourselves included.

Business Development and Employment

Whenever additional housing is envisaged within the Town Plan, we argue that it needs to be related to the demand for employment within the town. If the A264 reached capacity in 2004, it certainly has a traffic density greater now than then. East Grinstead would ideally not simply be a dormitory town for commuters. To be vibrant, any new housing should as a minimum keep a ratio of

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employment within the town at no lesser amount of employment than current. There has recently been an increase in change of use from empty offices to housing, and this is likely to intensify as the Government makes change of use easier to obtain. We would encourage the Town Council to engage with landlords of the remaining large offices in East Grinstead, to discuss how the accommodation can be updated to meet the needs of modern occupiers, and void/derelict office space can be reduced.

Traffic flows out from the town for employment purposes should ideally decline and additional employment opportunities be developed. This contention is not helped by the assumptions as Appendix 8 in Traffic Assessment update on behalf of Barratt Southern Counties in October 2011 and submitted to WSCC. Here the assumption is a majority of traffic movements to Crawley (69%). This will challenge any EGTC proposals for **sustainability** which could be achieved by increasing employment within EG. To obtain or maintain such ratios there needs to be evidence of additional employment coming into the town. The Town Plan needs to be evidence based. No evidence of additional employment should in itself issue a constraint to further housing development.

Town Centre Regeneration

I have recently visited Witney Oxfordshire. The town is thriving. It has a population of 23,000 similar to East Grinstead. It is similarly rural, drawing in consumers from a wide area. I feel sure people use Witney rather than Oxford since parking in Witney is free. Its shops are busy and there is a real liveliness about the town. The fact that East Grinstead charges for its parking, or indeed MSDC deem it necessary, I believe is a true restraint of trade within the town. Increasing charges effect the law of diminishing returns. Maybe the revenue does not go down, but I feel sure that the number of parking spaces used and the consequent loss of trade is truly affecting the business community in the town. No parking charges would significantly increase the footfall in East Grinstead.

May we ask the Council to make contact with Witney Town Council who could provide more information.

It seems counter-intuitive to penalise people for shopping in EG with parking charges, and incentivise out-of-town shopping where parking is free. West Sussex CC chose to charge for on-street parking in EG, when other similar towns across the county have no charges. Why this anomaly? Haywards Heath and Burgess Hill offer up to 1 hour free on-street parking. Although outwith the county, local consistency with Tunbridge Wells would also help. Parking is free on Tunbridge Wells High Street: one can pop into M&S, while you have to pay in EG. Uckfield is also, like Witney, - free parking and lots and lots of shoppers.

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Summary

The Town Plan should be evidence based.

The District Plan should validate existing, or offer alternative new evidence, not speculate.

Full account should be taken of housing development in and around the town since 2004, and unimplemented planning consents given between 2004 and today, when assessing its ability to take further development.

Additional housing should be part of the plan only if plans are also in place and to be provided contiguous with:-

- A road improvement scheme needed to address both the current traffic base load and the marginal changes from additional development. Also taking account of all the additional development since 2004.
- The associated infrastructure.
- Protection of value open spaces and environmentally sensitive sites.
- Additional employment opportunities.
- Town Centre Regeneration justified by increasing footfall and free parking options.

The Town Council asks that we respond, stating "The most important issue". The successful plan will be a matrix of all those on the questionnaire and these need to be prioritised. Perhaps in the order summarised above.

John E A Benstead (Chairman TOCERL and on behalf of PRC?)
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