

Neighbourhood Planning- The East Grinstead Experience

East Grinstead Town Council has been one of the first Councils to embrace the opportunity afforded by localism in the shape of neighbourhood planning.

We are appreciative of the open ear and support that has been shown from Parliament to the frontrunners.

The process started in East Grinstead in June 2011. We have worked hard to ensure that we are complying with the rules and have come to realise that to do this task correctly takes a lot of time and expertise and that the newness of the process means that answers are not always readily available.

Initial Comments

A new council, many new to being councillors, in May 2011 meant that a fresh view of the requirements for the plan have been broached. The enormity of the plan content when dealing with a medium sized town, often called a dormitory town for London or Gatwick commuting (50 and 15 minutes respectively), to realise aspiration, retain heritage and modernise cannot be underestimated. The Town Council are not planning experts, we have found difficulty in effectively liaising with the Planning Authority District Council as they have been busy drafting a new District Plan (LDF), and there are 8 front runners out of the 24 parishes in Mid Sussex, all asking for advice and assistance. It may have been useful to restrict the numbers for future waves so as not to overwhelm the Planning authority. They have a duty to assist in the process, yet can find this very stretching on resources.

East Grinstead hopes that it's experience can be used for the benefit of those Councils coming after and that the highly documented trail will help others to follow a simple process to achieve a plan.

Examination

Because we are at such an early stage of the process and none has successfully gone through the examination process at this time, we really would like clearer detail and advice on examination. What we need to achieve, what might cause us to fail and if we should fail, the process that would be available to move forward without the need to start from scratch. There is a lack of information on examination. Ideally there should be a document giving tick box criteria, evidence and standards of documentation needed.

Referendum

There is no guidance on the Referendum; we believe it will be a yes or no question, and that the plan must go forward on totality not different sections. We would like further guidance as to the handling of the referendum:

When must it be held once the examination is complete?

Can it be amalgamated with existing elections etc.?

Who will pay the cost of a second referendum if the first one fails?

There is also a lack of guidance to District Councils on who will pay for the examination or the referendum – leading to suggestion of withholding frontrunner

funds. We understand that funds may be made available to principal authorities to cover these costs and we would urge that this be confirmed as soon as possible.

Funding

The lack of guidance has led to uncertainty over what can be spent on the plan. We have allocated a budget this year in addition to the front runner funds, we have just appointed a consultant to help draw the plan and complete the consultation. The cost of this is nearly the full £20,000. Had we not had a budget we would be in a difficult position and should we not have all the monies available to us (the planning authority withhold) we could still be. Our planning consultant is keen to do a good job, they are bringing the plan elements together, however we are a medium sized town (26,000 population). We could not have undertaken the work alone. Our specification was drawn up with reference to other front runners. We had bids ranging between £15,000 (without drawing up the actual plan nor sustainability appraisal) to £19,500(complete).

Clearly the process (once complete will be easier to repeat, however if we need to go through the same process in 20 years this will be an expensive repeating operation. Guidance as to the need to repeat this exercise has also been silent, we assume NP (or something to replace it) will be necessary. But will this be full consultation, examination and referendum again?

Synergy with the Local Plan

There has been very little guidance on what to do if there is no Local Plan in place, as with our own District who have prepared a Draft Plan along similar time lines to our own.

What happens to the NP's if the District Plan should fail? We are advised that the NP's will then have precedence, but if they are not in conformity with a new district plan that comes in later where we would stand?

Also if there is no 5 year land supply agreed at the District Level, even once the NP is adopted would we be able to resist pressure from developers if greater than the development identified in our own plan?

Finally we are to be tested in conformity with the existing plan. If the new draft district plan has differences from the existing and is on the same timescale as NP, surely the conformity should be against the draft plan as this is the assumed master document once agreed. We do not necessarily envisage a problem with this – but it could be an issue and should be considered where the change at this level is coming in, either the NP should be delayed(not welcomed) or the draft plan having reached certain milestones (adopted by the Planning Authority and progressing to examination) should then be the lead document.

Evidence Base

We have / are consulting widely as is required, but it is an expensive process. Online Surveys and workshops are a cheaper option but do not necessarily get to all residents. We must ensure that best practice on these methods are shared to reduce

the costs and use most effective models. Town and Parish Councils have pretty much each invented the wheel. Some Parishes have done minimal consultation, others a great deal. This is all to satisfy the evidence base and therefore the guidance and criteria for satisfying the Examination is vital and has to be thorough yet cost effective in this matter.

Sustainability Appraisal

Again, guidance on this is unclear. Central Government appears to not want this to be onerous, it is not clear whether the Local Plan Sustainability Assessment could be used as the Strategic overview with additional focus areas.

Specialist help and advice

The parish of East Grinstead has found itself inbetween a rock and a hard place and obtaining good advice that is authoritative or assistance with overcoming the problems has not been plain sailing. East Grinstead has two development constraint issues (poor road infrastructure in the A22, subject to a 2012 study which says that 5 junctions are at, or over, capacity and only if expensive infrastructure improvements are carried out can we take more housing development) and the EU habitats directive concerning Ashdown Forest (EG is in total within the 7km buffer zone). Our planning authority initially felt this was not a problem for development and were pushing the Town to significantly contribute to the overall housing allocation. Having received further information to expand, this is now agreed to be a matter to be resolved and SANGS(suitable alternative green space) is being identified and put in place, there is of course no knowledge as to whether the Planning Authority have received advice that will stand up to challenge or if enough mitigation has been planned. Therefore this leaves us unsure as to the position of the NP in this matter.

Additionally the District Council will determine the CIL (Community infrastructure levy). Clearly it is not in their interest to set this level beyond commercial development interest, yet large proportions of the money must go to set up SANGS and road improvements, therefore demanding large numbers of dwellings or raise enough to pay for the required works. Not being Planning experts we have been in no position to query the approach from the District or potentially establish the situation should their approach be incorrect. In attempting to engage with the firms in receipt of the government funding to assist the front runners, none were interested in assisting us with advice or help as to overcome the road restrictions or habitats mitigation. Parish Councils need help to get their NP right, this has not been forthcoming for us on the two biggest stumbling blocks.

Public Perception

In attempts to engage with the public we have stressed the importance of their views to help shape the town. However more and more housing developments are coming through each week (not all on the SHLAA), but as the District has no 5 year identified land supply it has lost appeals partly on this basis. This does, to a degree, undermine the efforts we are making. To do a good job we must take our time, the longer the NP and District Plan are not in place the more speculative planning

applications (some in contravention to the wishes we would want for the town) are received. This window of opportunity once closed must never be allowed to open again and the Government are urged to ensure that this cannot repeat. Communities will pay for the lack of a District Plan (for whatever reason) and this is simply unacceptable.

Training

As the vast majority of Councillors have no planning experience and Neighbourhood Planning is a new responsibility, a joined up programme of training would be helpful. It ought to address all issues before they come to the fore. The process, timetabling, consultations, sustainability appraisals, SHLAA evaluations, referendum requirements, Habitats Directive and other relevant issues proactively presented would be most helpful.

The District Council has provided some training but as Neighbourhood Planning is a nation issue it could be addressed on a wider scale. The implications of making the wrong decisions through lack of knowledge or misinformation are huge.

Could the training process also include suggested formats for Neighbourhood Plan documents as a degree of conformity between plans would surely make examination easier and therefore more cost effective?

In conclusion

As with all new processes there will be a learning curve, This has been an experience of foot finding, often in the dark. Support and advice is the most required asset and the need to produce a set of helpful documents and checklists for following councils and the future. We are grateful that the Government has remained open and keen to hear experiences to date and we hope that this report is helpful in continuing to provide guidance and formulate the process. The opportunity to speak directly with MP's in the house was much appreciated.

Julie Holden
Town Clerk
East Grinstead Town Council

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