

# THE EAST GRINSTEAD SOCIETY

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Head of Department  
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Dear Head of Department

## **Comments on Mid Sussex submission District Plan May 2013**

We would like to make the following comments on the submission Plan.

### **Road infrastructure**

On the 11th January 2012 we wrote regarding the October 2011 draft District Plan expressing concerns on the overall strategy, housing policy and the effects of the Habitats Regulations. These concerns remain. In addition we think that East Grinstead's road infrastructure deficiencies have a direct bearing on house-building and should be explained and quantified in the Plan. We think that a sustainable District Plan should start from an agreed understanding of local infrastructure constraints. This information is necessary to provide a planning framework in which Neighbourhood Plan housing needs can be specified realistically from a firm baseline.

### **A development strategy**

Apart from a brief acknowledgement of congestion problems along the A22/A264 the submission Plan has no strategy for addressing them. There is no mention of the Atkins Report that gave professional analysis of the options available to ameliorate traffic congestion; no mention either of the Atkins Report in Appendix A which lists the Plan's evidence base. We feel strongly that the District's plans for the next two decades cannot effectively be dealt with unless the 'elephant in the room', namely East Grinstead's traffic problem, is treated as a priority and a starting point for considering future housing development. On the matter of road improvement an Infrastructure Development Plan strategy that depends for funding on East Grinstead's acknowledged limited capacity for further house-building would not be credible. As planning authority surely the District retains responsibility, within the rules of the NPPF, to make clear infrastructure constraints that affect housing development and to have an alternative Plan B available. There are several options that could be considered. One of these, a development at Crabbet Park, was considered in the draft District Plan of October 2011 but not pursued. This option should, we suggest, be re-appraised if adequate road infrastructure is not achievable.

## **Detailed comments on the Plan arising from the above paragraphs**

### The Challenge Facing the District

2.8 states "Transport infrastructure is under particular strain ..... congested towns and major junctions. East Grinstead in particular has acknowledged congestion problems along the A22/A264."

This statement does not do justice to the seriousness of traffic congestion in East Grinstead. Residents place it high on their list of concerns. Its relationship to development is not made clear. Information from consultants' studies show that no further housing should be contemplated until traffic congestion has been reduced. Such information should we think be in the District Plan to provide an appropriate framework within which NP housing proposals can sensibly be based. Road congestion information is available from WSCC Highways and their consultants Atkins and MTRU specifically on junction improvements.

### Overall Strategy

3.22 states "The Plan also acknowledges that the level of housing and other developments will need to be spread over the Plan period ..... and will depend on the timely delivery of infrastructure."

This does not give due weight to the existing infrastructure deficit. We believe that this fundamental issue should be highlighted and the following added to 3.22: *Housing development will depend upon A22/A264 congestion at East Grinstead being reduced to an acceptable level as a pre-condition before further planning applications can be considered.*

### DP1 Sustainable Development

Since the NPPF emphasises sustainable development as a condition for housing development we think the second bullet point should be extended to include a statement on the following lines: *As an example, housing applications at East Grinstead will not be approved unless traffic congestion measures on the A22/A264 have been implemented and their effectiveness assessed.*

### DP3 Town Centre development

We applaud the emphasis on town centre development. This is particularly important at East Grinstead where sensitive re-development to encourage visitors and new business is high on the Town Council's agenda. We suggest this should be emphasised by adding a new paragraph: *Resources for town centre housing and business development in East Grinstead should have priority over housing development and infill proposals.*

### DP5 Housing

DP5 sets a housing requirement of 10,600 units for the District. Locations have been identified except for 2000 which the Plan says are expected to be provided 'elsewhere in the District'. In the spirit of setting a secure baseline for the Plan referred to earlier we ask that site details of the Completions in 2011/12 (522) and Housing Commitments (4213) be provided in the DP5 Table or elsewhere in the Plan. These figures at the outset would prevent arguments in the future about what site was and what site was not in the District Plan when future applications are considered. As mentioned earlier there should also be an alternative Plan B to deal with the target housing shortfall should this arise because, for example, A22/A264 junction costs could not be sourced as a pre-condition for future housing applications in East Grinstead. Therefore we suggest adding the following to

DP5: *If a housing target shortfall proves likely the possibility of siting homes elsewhere will be re-considered.*

DP9 - Protection of the countryside

The last sentence regarding built-up area boundaries should be extended to confirm that developments encroaching into AONBs beyond such boundaries will not be contemplated.

DP10 Preventing coalescence

The DP9 comment also applies in respect of intrusion into strategic gaps to prevent coalescence.

DP18 - Securing Infrastructure

We support strategic objective DP18 to ensure that developments are accompanied by the necessary infrastructure but, at risk of repeating ourselves, we must emphasise that historic infrastructure deficits should be dealt with before the infrastructure requirements of new developments are considered.

DP27 - Pollution

There is the possibility of further expansion of Gatwick Airport being considered in the Plan period. Should some reference be made to this in DP27 in relation to the possibility of increased pollution affecting the District?

DP29 Affordable housing

We support DP29 and agree that developments should provide at least 30% of affordable housing or, in the case of very small developments, a monetary contribution. What we are unhappy about is the possibility that the requirement might be watered down if the site viability assessment cannot justify this. The most likely reason for this request from a developer would be because he has paid, or proposes to pay, too much for the land. There is no reason why the residents of the District should subsidise developer imprudence.

Yours sincerely

Nic Beale  
Chairman

John Bridle  
Committee member

Copy: Town Clerk,  
East Grinstead Town Council