

# THE EAST GRINSTEAD SOCIETY

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Planning Policy Division  
Mid Sussex District Council  
Oaklands,  
Oaklands Road,  
Haywards Heath,  
RH16 1SS

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Dear Sirs,

## **Comments on the Mid Sussex District Plan 2014-2031**

We would like to make our comments on the Consultation Draft issued in November 2014. Some of these are a repetition of those made in 2012 and 2013 to earlier drafts of this document but they still apply and are worth repeating. In addition there are some new points to raise in respect of the latest draft.

We wholeheartedly agree that Mid Sussex is an attractive place to live, work and visit but this very attractiveness introduces some local development constraints which are peculiar to the area in general and East Grinstead in particular.

The lack of housing numbers and potential sites in this Draft means that we cannot make detailed comments on those aspects of the plan but there is one fundamental point to be made. Future infrastructural improvements are dependent on Community Infrastructure Levies and section 106 contributions

from new developments. This ignores the infrastructure deficit which has arisen, particularly in East Grinstead, from housing developments which have outstripped the local infrastructure improvements which are required to sustain them. This has worsened the situation for existing inhabitants of the town. As the road network is already incapable of dealing with the current traffic flows and there is likely to be an even greater problem as further developments are approved before the District and Neighbourhood Plans are finalised and officially approved.

There is a brief acknowledgement in the draft plan of the problems along the A264/A22 and the reference to the infrastructure deficits in sewerage and water supply and open space and sports/play provision but no indication how this shortfall will be made up. It is unrealistic that provision for this shortfall will be made by future developments.

In view of East Grinstead's particular road congestion problems we suggest the fourth bullet point, second sentence of paragraph 2.9, should be extended to read "East Grinstead in particular has acknowledged congestion problems along the A22/A264 to the extent that future development will be limited to town centre renewal and brown field development unless and until A22/A264 junction improvements have been made". Similarly, when Policy DP5:Housing is being prepared include this housing limitation in East Grinstead's development proposal.

Currently there appears to be an open season on housing developments in East Grinstead yet the planners are not even insisting on proper contributions from developers towards the congestion that will result nor to proper proportions of affordable housing. It is all very well detailing Priority Themes and Strategic Objectives but problems brought forward must be addressed.

We note that the draft plan makes no assumptions about the possible expansion of Gatwick Airport other than assuming the current position of no changes until

2019 is maintained. If there were to be changes after that date then obviously the whole plan would have to be reappraised fundamentally.

With regard to the specific policies in the document we support the principles of DP9 and DP10. There should be a presumption against development outside the existing town built-up boundary, notwithstanding the breaches that have already occurred, to prevent coalescence with neighbouring settlements. There is already a threat of creeping development towards both Turners Hill and Crawley Down. The strategic gaps must be maintained.

Similarly, policies DP13 and DP14 are of importance to East Grinstead provided the SANGS and SAMM are administered robustly and developers are not allowed to water-down their obligations as have occurred with some section 106 agreements in East Grinstead.

Securing Infrastructure, DP17, should be extended to deal with the infrastructure deficit brought forward. The constraints on development in East Grinstead because of the closeness to Ashdown Forest and the High Weald Area of Outstanding Natural Beauty mean that likely CIL payments and section 106 agreements will be insufficient to pay for both future infrastructure needs and the deficit brought forward. The same comment applies to DP18 regarding Transport. Should Gatwick expansion go ahead, of course, the whole transport network would have to be reexamined as there is no way that the vastly increased east/west traffic flows to the enlarged airport and the implications of tens of thousands of incomers moving into the area could be catered for by the existing road system.

DP21 relates to Leisure and Cultural Facilities and Activities including, inter alia, informal leisure space. This seems very sensible and when one turns to Appendix B one of the saved local policies is EG18. This is saved from the 2004 Mid Sussex Local Plan and includes the green space at the junction of Blackwell Farm Road and Holtye Road. This site, owned by MSDC, is currently the subject

of a planning application. We have the ludicrous situation whereby the Solicitor to the Council proposes to appropriate the land, which is acknowledged to be an open space, to planning purposes so that MSDC, the planning authority, can give MSDC, the developer, permission to put houses on the site. Meanwhile MSDC in its draft District Plan proposes to include it as an informal open space as a saved policy. It should remain an informal open space.

We support the Council's inclusion of Local Green Spaces (paragraph 3.18) in the allocation of land in the District Plan. We think this initiative could go further to identify in the District Plan green spaces valued by local communities for protection from development. See Policy DP37 suggestion below.

We welcome policy DP22 and trust this will include protection of the Wallis Centre as there is no duplicate facility in the locality. There is insufficient alternative accommodation within East Grinstead to house all the groups and youth project work currently using the Wallis Centre.

In general we support DP23 to DP29 but regret that on some recent planning applications the 30% minimum for affordable housing provision has not been met. Regarding DP30 we approve the policy but would ask why the proposed scheme at Imberhorne Lane Nurseries is still under discussion when it does not seem to comply with current Government guidelines nor with those which are proposed for the draft plan going forward?

Whilst fully supporting policy DP37 "to create and maintain easily accessible green infrastructure, green corridors and spaces within towns to act as.....recreational routes" we think that green spaces valued by the community should be specified in the District Plan in order to protect them from future development for the future of residents. This Society is currently carrying out a review of green spaces in and around the town which we would be pleased to provide for inclusion in the Plan.

Finally, we emphasise the importance of DP41, Water Infrastructure and Water Environment. Obviously, until housing numbers are known there cannot be any definitive comments but the Council must be certain that sufficient resources are available before proposing any specific housing numbers. The same applies to all the other infrastructure requirements for a 21st century district.

Yours faithfully,

N J Beale

Chairman

Cc: Town Clerk

East Grinstead Town Council