

EAST GRINSTEAD SOCIETY
Registered Charity No 257870

10 Austen Close
East Grinstead
West Sussex RH19 1RZ

The Town Clerk
East Grinstead Town Council

25th September 2013

Dear Julie

Neighbourhood Plan (NP)

We would like to make the following comments on the draft plan which is currently out for consultation. We have attempted to use the paragraph numbering system as the order in which our points are raised. In consequence, the detailed comments that we make are in document order and not necessarily weighted in order of importance to our Society.

Overall we think the plan contains a number of good ideas which, when implemented over time, will make the town more attractive to residents and visitors and attract more business. However, before dealing with the detailed comments there are some general points we would wish to make.

On one of the key issues, dealing with the demands on the town's road infrastructure whilst facing demands for housing, we are pleased to see this features as one of the reasons for the NP. However, we do not think expressing it as a conundrum in 1.1.3 is the right word. There is a solution and that is to limit new house-building until congestion is reduced! Accordingly, we would like to see the concept of conditionality incorporated in Chapter 1.

The concept is introduced in 4.4.5 where it says that any new housing must be assessed as to whether the impact on junctions will be severe, to be assessed by WSCC associated with the consideration of the cumulative effect of new developments which individually may not present a severe effect. This implies that a new housing application could be refused as a consequence of a WSCC ruling but does not actually say so.

Would consultation with WSCC on junction impact be sought on planning applications arising from the further 585 estimated housing capacity in the built up area? As at March 2013 these sites are only 'possibles' so planning considerations have not been applied.

The second question is how much of this document constitutes 'The Plan'? Are the Appendices A-J considered to be an integral part of the Plan or are they merely afforded a

subsidiary status outside the main document. This is important as there is a lot of detail in these sections which informs and amplifies the points made in the five main chapters and so should be afforded equal weight. Will the Inspector include them in his assessment of soundness and conformity with the National Planning Policy Framework and the District Plan?

A third point, following on from the one above, is that there are a number of instances where it would be helpful if links could be made between paragraphs which relate to similar subjects. As an example, the fundamental importance of the implications of the Atkins 3 Study affects housing policy, transport and other infrastructure matters and the importance of considering details in the plan on a comprehensive basis and not just a series of unrelated increments. Without the road infrastructure deficit brought forward being addressed at an early stage in the plan period, many of our aspirations will fail to see the light of day.

Many of the Policies have Related Actions and Rationale which justify and underpin the policies and give important reasons for them. We trust these will carry the same weight as the policies themselves. Looking to the future, this would be fundamental when considering planning proposals at that time

Now for our detailed comments, some of which reflect the issues above.

1.1.3 An overt linkage to 4.4.5 and to Traffic Management and Road Infrastructure Changes on page 114 would be helpful

TC01 Add an explicit reference to the listed buildings and the Conservation area.

4.3.4 There is no knowledge of the current mode split, will this make it difficult to implement this policy?

AM06 This should make some reference to the likely variations in traffic movements following pedestrianisation of the High Street and London Road as new 'rat runs' may occur. Link with AM11

AM11 We are in favour of a Pedestrian Priority Town Centre but think there should be a clearer vision of the traffic diversions arising as a result of this and a possible redevelopment in Queens Walk.

AM15 We refer back to our comments on Atkins 3. Until the traffic flows on the A22 and A264 are resolved this may result in a brake on future improvements. We also believe that the removal of the gyratory traffic system between the A22 and the railway station would do nothing towards the objective of getting through-traffic round the town as quickly and as smoothly as possible.

NB The Railway Approach area map is Figure 7 not 8 on page 49.

4.4.1 Instead of 'link' new housing development to long term infrastructural improvements, make it 'conditional upon'.

4.4.5 Make the implementation of Atkins 3 a 'firm commitment'.

HC01 The map annotated Figure 8 is too small to read without a microscope. Could it be turned through 90 degrees and presented as an A4 document? The sites apparently available should be numbered and these numbers should be incorporated onto the schedules on pages 108 and 109 to avoid confusion. Sites such as the green space at the junction of Blackwell Farm Road and Holtye road and referred to as a green space in EN03a should be removed from the map as should any other site on the map which is not explicitly mentioned on pages 108 and 109 eg Beckfords on the Lewes Road. We suggest that the policy is amended to include the condition that the effect on the junctions shall not be individually nor cumulatively severe.

HC04 The Housing Mix should depend not on the Planning Authority's criteria but on the needs of East Grinstead. The threshold for affordable/social housing should be of the order of 30% and requests by developers to lower this should be firmly resisted to prevent the general public effectively subsidising developers because they are potentially paying too much for the land to meet their affordable housing obligations.

HC07 New, existing or relocated sports facilities should have safe walking/ cycling routes to them so that they are accessible to all children.

HC10 Does this conflict with the 28 unit site detailed on page 109?

HC11 The Rationale should mention the requirement for A22/A264 improvements to be completed before housing construction could begin.

Appendices

Housing Policies.

The identification of individual sites particularly those in the pipeline which are not yet approved and those identified for the future might be taken as acquiescence to their development and weaken the planning process in relation to them. This should go forward with each one receiving the same degree of scrutiny as heretofore. Should more be made of the 'windfall' opportunities that are coming forward, even now, of changes of use of redundant offices both in blocks and above shops. This could be linked to EC10.

Of the sites identified on the schedules on pages 107,108 and 109 no less than 377 units would use the Holtye Road to come into East Grinstead and most would use the Moat Road/A22 junction, need any more be said?

Traffic management and Road Infrastructure Changes.

See our comments on AM15. The traffic issues should not solely consider traffic movements within the town but should also ensure that through-traffic flows past in an efficient manner.

We hope these comments are constructive and would welcome the opportunity to explain ourselves more fully if that would assist the drafting of the final version of the Plan.

Yours sincerely,

Nic Beale

N J Beale
Chairman

beale546@btinternet.com

Tel: 01342 326767