



Campaign to Protect
Rural England
SUSSEX

CPRE Mid Sussex
Response to Mid Sussex District
Council
Consultation Document on East
Grinstead Area Action Plan

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Introduction

1. The CPRE are the champions of England's countryside, a registered charity with over 60,000 members and supporters living in our cities, towns, villages and the countryside. We operate as a network with over 200 district groups, a branch in every county, a group in every region and a National Office. Over 2000 parish councils and 800 amenity societies belong to CPRE. We strive to ensure that change and development respect the character of Britain's natural and built landscapes, enhancing the environment for benefit of all.¹
2. Housebuilding is responsible for the loss of more green-field land than any other form of built development. The CPRE campaigns to prevent housebuilding development from sprawling into the countryside.²
3. The Mid Sussex District Council has published a consultative document on its East Grinstead Area Action Plan, and a 6-week period of public consultation is now in progress. This paper is the response of CPRE Mid Sussex to this proposal. Our response evaluates the draft Area Action Plan in the light of the CPRE's policies and values.

Priority for Small-Scale Sites & Previously-Developed Land

4. The CPRE supports the Government's "sequential approach" to development, that brown-land (ie previously-developed) sites should be developed before green-field land is released. The CPRE holds that the national target for new homes built on brown-field land should be raised. It believes greenfield sites should only be the option of last resort, where there is a proven local need, and where no alternatives

¹ CPRE web-site - home page

² CPRE Sprawl Patrol Campaign, December 2003.

can be found.³ It is also the policy of the CPRE that housebuilding should be discouraged from sprawling into the countryside, and that all new housebuilding should be built at a minimum density of 50 dwellings per acre.⁴

5. Nevertheless, and in spite of claims to the contrary, the evidence suggests that the East Grinstead development has not followed the "sequential approach" to development. It now seems clear that large scale strategic development on green-field land has been embraced before priority sites had been fully or sufficiently investigated.
6. Originally, when the Structure Plan Deposit Draft was published at the beginning of 2002, the Planning Authorities claimed that there was not enough previously-developed land or small scale sites in Mid Sussex District to accommodate the volume of housebuilding needed. They said large greenfield Strategic Locations, such as at East Grinstead, were therefore unavoidable.
7. Since 2004 however, MSDC officials have provided a succession of reports, including a detailed Urban Potential Study, identifying many more previously-developed and small scale sites than previously. Their recent report on the Small Scale Housing consultation identifies sites that are apparently capable of accommodating some 9,000+ dwellings in the northern part of Mid Sussex District. It remains unclear why these sites were not taken into account when the "sequential approach" was being applied at the Structure Plan stage. But if the opportunity was lost then, it should not be lost now.
8. CPRE Mid Sussex believes the Area Action Plan should be revised to take account of these new facts, re-visiting the options for previously-developed land and small scale development, and making more rigorous application of the "sequential approach". The aim should be to make more use of previously-developed land and small scale sites, at an acceptable density, and to limit the use of greenfield-land in the countryside.

A diminishing range of infrastructure provision

9. The CPRE believes housebuilding and infrastructure should be planned together. When commenting on development proposals, it is the CPRE's policy to highlight infrastructure requirements such as roads, public transport, water, schooling and other community facilities.
10. In the case of the East Grinstead development, the declared aim of the Planning Authorities has been that the developers should be required to fund road-building and other infrastructure. Now however the developers appear to be casting doubt on their willingness or ability to do so: there has long been an expectation that they would provide a wide range of infrastructure projects: but the range of projects they are willing to fund now appears to be shrinking.⁵ The anxiety must now be that as costs escalate, this shrinkage will become a continuing process, leading eventually to the housebuilding being provided without the necessary infrastructure. Water must be a special concern in the light of the recent House of Lords report.
11. CPRE Mid Sussex therefore believes the Area Action Plan should be revised to provide greater confidence that the full infrastructure requirements are met. This can be done, for example, by relocating the housebuilding so that less external road-building is necessary. This will reduce the financial burdens on the project, and reduce the risk that funds for infrastructure will be squeezed.

³ CPRE Housing Manifesto

⁴ Ditto.

⁵ Letter from the developer consortium to Mrs J Hewitt, MSDC, dated 11 April 2006.

Respecting the character of the built environment

12. The CPRE believes that development should respect the character of England's built (as well as natural) landscapes.⁶ We emphasise the wider environmental 'footprint' of development; historic towns and their surrounding countryside should be perceived as a single whole, each drawing life from the other. It supports the policy in the WSCC Structure Plan to defend "the overall perception of each historic town as an entity".⁷
13. These policies are important in the present case because East Grinstead is the principal historic town in Mid Sussex District. CPRE Mid Sussex therefore looks with concern at the current Area Action Plan, which would bolt onto one edge of East Grinstead a sprawling suburban development of wholly disproportionate scale. The Strategic Location of 2,500 houses would amount to a new satellite town, situated in the Strategic Gap between East Grinstead and Crawley Down. Together with other housebuilding planned, it would expand the town by over 45%, adding about 4,500 houses and about 7,000 cars. We see the risk that dormitory housebuilding on such a huge scale will so dominate the historic town that its distinctive character will be submerged.
14. CPRE Mid Sussex therefore believes the Area Action Plan should be revised to take account of East Grinstead's position as a Historic Town on the edge of the Ashdown Forest; proportionate limits should be set to the scale of green-field development sprawling into the surrounding countryside.

Planning and transport policies should reduce the need to travel

15. The CPRE believes it is necessary to plan for sustainable patterns of development to meet society's housing needs without wrecking the countryside.⁸ It shares the Government's support for planning and transport policies that promote accessibility to jobs, and which reduce the need to travel. It believes a road scheme should only be pursued where it can be demonstrated not to lead to traffic growth or longer journeys.⁹
16. As the East Grinstead strategic development has advanced, however, the Planning Authorities have made clear that the new town on the edge of East Grinstead would function primarily as a commuter satellite of Crawley/Gatwick.¹⁰ They see its role in terms of providing labour to promote economic growth there. This intention is borne out by the scale of the current plan; the residential development planned would apparently generate about 5,000-6,000 people seeking work, while the business/commercial development planned would provide only about 500-1000 new jobs. This shows the scale of the planned exportation of labour from East Grinstead to Crawley.
17. CPRE Mid Sussex believes that a plan to export labour from East Grinstead to Crawley on this scale would have unacceptable consequences. It would necessitate longer travel-to-work journeys. It would aggravate commuting on an unprecedented

⁶ CPRE Statement of Vision & Values.

⁷ Structure Plan policy CH8.

⁸ CPRE's Housing Manifesto.

⁹ CPRE Policy Position Statement on Roads and By-Passes

¹⁰ This intention is made clear in numerous statements made during the planning process: —

- "WSCC sees East Grinstead as well placed to make a contribution to labour needs in the wider Crawley/Gatwick area" — Structure Plan EIP report paragraph 6.63
- "Large mixed-use development ... associated primarily with growth in the Crawley/Gatwick area" — Structure Plan, policy LOC1.
- "East Grinstead is close to Crawley/Gatwick and would support economic growth in the NE of the county" — Structure Plan paragraph 82.
- "A large proportion of the allocation of dwellings to the [East Grinstead] Strategic Location relates to the needs of the Crawley/Gatwick area" — Structure Plan policy NE1a, footnote.

scale, on roads which are already loaded to capacity. At one time it was hoped that the capacity of the local road network could be expanded to the necessary extent, but these hopes have now been disappointed — see below.

18. CPRE Mid Sussex believes the Area Action Plan should be revised to provide a more sustainable balance of homes and jobs, above all with homes and jobs in closer proximity to one another. A significant proportion of the strategic house-building should be located closer to the relevant employment opportunities at Crawley/Gatwick, rather than at East Grinstead.¹¹ CPRE Mid Sussex is aware that several possible locations for strategic residential development are under investigation to the east of Crawley. These investigations should be brought forward and redoubled.

Traffic relief - Road-building and housebuilding not the way

19. The CPRE believes too many road-building schemes bring lasting damage to the countryside and fail to solve the underlying problem of traffic growth. It believes a road scheme should only be pursued where it can be demonstrated that it is consistent with traffic reduction targets which have been set locally; and that it is justified in terms of economic benefits claimed.¹² Schemes to fund road-building out of the profits of residential development may be especially damaging. The attempt to achieve traffic relief by this means may prove entirely counter-productive, if the extra traffic generated by the residential development exceeds the capacity of the road-building provided.
20. That now appears to be the inescapable outcome at East Grinstead. The proposed East Grinstead strategic development is contingent on traffic congestion being reduced below current levels.¹³ A Strategic Transport Assessment Report has been produced, containing traffic modelling studies to measure whether this can be achieved.
21. Inspection of these studies suggests that while traffic relief may be achieved on a few roads in East Grinstead, it would only be at the cost of sharp traffic increases on many more. Much of this induced rat-running would be through residential roads, creating dangers that not many Councillors would wish to be responsible for. Overall, if the evidence of the traffic modelling studies is to be believed, there is no foundation for any claim that congestion will be reduced in the town as a whole. This is the entirely foreseeable outcome if, as expected, 4,500 new houses generate 7,000 additional cars.
22. Apart from the absence of the traffic relief needed, the planned "relief" road also appears to raise insoluble environmental difficulties. Currently, the "relief" road route options appear to comprise one route through the High Weald Area of Outstanding Natural Beauty, and another route through a densely populated suburb. Each seem as damaging as the other.
23. The unfolding reality of the East Grinstead "relief" road scheme should be recognised as an eloquent vindication of the CPRE critique mentioned above: that all too many road-building schemes bring lasting damage to the countryside while failing to solve the underlying problem of traffic growth. CPRE Mid Sussex believes the Area Action Plan should be revised, recognising the failure of its "relief" road scheme to meet the traffic reduction targets set for it, or to justify itself in terms of economic benefits claimed. It suggests that traffic relief in East Grinstead can best be achieved by building fewer houses there, by improving existing roads, and by re-thinking the scope for providing priority to public transport.

¹¹ For the avoidance of doubt, CPRE Mid Sussex does not argue that housebuilding allocated to East Grinstead should be removed to Burgess Hill.

¹² CPRE Policy Position Statement on Roads and By-Passes.

¹³ Structure Plan Appendix B — Strategic Development Principles — East Grinstead. "Current levels" are those of 2004, when the Structure Plan was adopted.

Conclusions drawn by CPRE Mid Sussex

24. The East Grinstead strategic development scheme was conceived as a package. On the one hand a need was seen for a location for major housebuilding, in order to meet Government targets. On the other hand traffic congestion was seen as calling for a "relief" road. A developer-funded "road for houses" scheme appeared to be the answer to both needs. Now however the realities of such a scheme have had time to emerge. The salient facts are summarised above, and they need to be faced. The project has failed to meet the needs for which it was designed. To pursue it in the teeth of all this accumulating evidence would be a mistake.
25. Instead, CPRE Mid Sussex believes the Area Action Plan should be revised to take account of : —
- (a) Up-to date evidence on the availability of previously-developed land and small scale sites in Mid Sussex, making more rigorous application of the Government's sequential approach to development priorities;
 - (b) The need for complete confidence that the full infrastructure requirements are met; and the consequent need to avoid locations that impose an impractical burden of road-building requirements;
 - (c) The need for a proportionate scale of development in view of East Grinstead's position as a Historic Town on the edge of the Ashdown Forest;
 - (d) The need for a more sustainable balance of homes and jobs in closer proximity, with a large proportion of the house-building allocated closer to the relevant employment opportunities at Crawley/Gatwick;
 - (e) The failure of the "relief" road scheme to meet the traffic reduction targets set for it, or to justify itself in terms of benefits claimed;
 - (f) The scope for achieving traffic relief in East Grinstead by building fewer houses there, by improving existing roads, and by re-thinking the scope for providing priority to public transport.

3 June 2006