

1. Is the scope of the Plan in line with the strategy of the District Plan and in particular the 4 aims set out in the submitted DPD?

1.1 The Council has failed to fully meet the stated aims of the submitted plan

1.1.1 The second aim of the plan advises that the Council will maintain a sustainable housing/employment balance:

“To allocate sufficient employment land to meet the residual need and in line with policy requirements set out in District Plan Policy DP1 : Sustainable Economic Development”

1.2 DP1 Strategic objectives

1.2.1 Policy DP1 is underpinned by two strategic sustainability objectives, both of which are in conflict with the SA19 and SA20 allocations:

- *“To promote a place which is attractive to a full range of businesses, and where local enterprise thrives”*; and
- *“To provide opportunities for people to live and work within their communities, reducing the need for commuting”*.

1.3 Evidence of conflict with sustainability objectives

1.3.1 The ‘made’ East Grinstead Neighbourhood Plan highlights the problem of traffic congestion along the A22 corridor into the town centre, as a constraint to future growth and investment:

7.1 The constrained nature of East Grinstead’s current infrastructure is by far the greatest challenge facing the town in the immediate future, with existing roads and junctions already over capacity. In addition it has to absorb further traffic coming onto the road network from the 560 dwellings already approved and committed. This is well documented in recent studies including the Atkins Report 2012 and the Jubb Reports (published in 2014 and March and July 2015). That the key junctions along the A22 within the town and the A264 between Crawley and East Grinstead are operating at or very close to capacity. In many cases junctions are operating over capacity. The strategy being adopted by the Town Council therefore, is to provide policy guidance on sites and development proposals with the caveat that highway mitigation has to be provided in order to allow new development to proceed.

1.3.2 The DPD allocates a further 772 homes to East Grinstead without allocating any local employment space. Neither did the Local Plan allocate any employment space. The plan detracts from a deteriorating employment position.

1.3.3 In June 2020, against the advice of the Town Council and the East Grinstead Business Association, the last remaining large office building (East Grinstead House) was approved for residential conversion to 253 apartments¹. The East Grinstead Business Association

¹ Council Planning References DM/20/1361, DM/20/1366, DM/20/1369 and DM/20/1370

confirmed the displacement of 1,000 existing workers, so continuing the trend against a sustainable housing\employment balance (Appendix A).

- 1.3.4 The Mid Sussex Economic Profile Study (2018) – excluded from the DPD evidence base – states in its key findings, that *“There has been a significant loss of office floor space to residential conversions particularly in East Grinstead.”*
- 1.3.5 When asked how much office floor space has been lost to residential conversions since permitted development (change of use) relaxations since 2013, the Council responded that it did not know. When asked how much office floor space currently exists within East Grinstead, again, the Council responded that it did not know (Appendix B).
- 1.3.6 The loss of office floor space is also evidenced by 2020 Northern West Sussex Economic Growth Assessment Update Study [E2]:

6.48	Information about the scale of office floorspace associated with these prior approvals and the current status is unavailable, so it is not possible to quantify the total amount of office floorspace that has been, or could be lost from the District’s office supply portfolio as a result of PDR.
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- 1.3.7 The severe congestion of the strategic highway network, at peak times of the day, and in particular the A264 trunk road between East Grinstead and Crawley, reflects the very significant levels of commuting-out. This situation will (significantly) deteriorate further with allocations SA19 and SA20.
- 1.3.8 The allocation of significant levels of housing in East Grinstead without allocating further employment space and against the background of declining employment opportunities, is contrary to DP1 and plan aims.

APPENDICES

- Appendix A - East Grinstead Business Association objection to East Grinstead House residential conversion

- Appendix B - Email correspondence with Council re. Extent of residential conversions

APPENDIX A

From: Lee Farren [REDACTED]
Sent: 02 June 2020 11:40
To: [REDACTED]
Subject: East Grinstead House Planning Application

Hi [REDACTED]

Hope you are keeping well during these difficult times?

After recent discussions with the committee of East Grinstead Business Association.
We would like to put forward our thoughts on the below to the district planning committee please.

As the largest independent Business Association within East Grinstead we are very alarmed to see the recent set of four concurrent planning applications made by Galliard Homes at the East Grinstead House very large office complex in Wood Street.

We realise that all four applications have been made under the Town & Country Planning (General Permitted Development) Order 2015 that only requires a prior approval process from the planning authority.

These applications seek to change the use class from B1(a) Office to residential.

The scale of the applications taken together at 12,000 square metres or 128,000 square feet are a totally unacceptable loss of existing good quality office accommodation situated in the centre of our town.

There are seven existing long standing large and well known successful local businesses that have live leases running - and in combination employ around 1,000 people.

East Grinstead has lost nearly all of its existing office floor area during the past ten years due to similar applications to convert into small residential apartments.

We would urge Mid Sussex District Council to apply for an Article 4 Direction in order to protect this last remaining essential town centre office business hub - and to resist yet further destruction of the office portfolio capacity.

We therefore wish to object to all four applications on the basis of an unacceptable loss of business accommodation stock - and without any future plans to in part or whole to replace such essential capacity.

Kind regards

LEE FARREN
CEO

East Grinstead Business Association
East Court
College Lane
East Grinstead
West Sussex RH19 3LT

www.egba.co.uk



APPENDIX B

From: Roger and Tess <[REDACTED]>
Sent: 01 September 2020 14:49
To: planningpolicy <planningpolicy@midsussex.gov.uk>
Subject: Permitted Development Rights conversions

I note from the Key findings of the 2018 Mid Sussex Economic Profile Report that "there has been a significant loss of office floor space to residential conversions particularly in East Grinstead"

Could you let me know how much office space has actually been lost in East Grinstead since the permitted development legislation was passed in 2013 please?

Thank you

Roger Tullett

On Thursday, 10 September 2020, 16:27:28 BST, planningpolicy <planningpolicy@midsussex.gov.uk> wrote:

Dear Mr Tullett,

Thank you for your e-mail. We do not have monitoring records for the amount of floorspace lost through office to residential conversions. However, please find attached a list of approved prior approvals for office to residential since 2013 in Mid Sussex District.

The online Planning Register provides details of the applications so you may be able to obtain the floorspace information from the documents submitted for each application: <https://pa.midsussex.gov.uk/online-applications/>

I hope this is helpful, but if you have any further questions please do not hesitate to contact us.

Kind regards,

From: Roger and Tess <[REDACTED]>
Sent: 17 September 2020 17:48
To: planningpolicy <planningpolicy@midsussex.gov.uk>
Subject: Re: Permitted Development Rights conversions

[REDACTED]

Thank you for your response supplying me with a list of planning references for permitted development applications.

Whilst I note your point about the Council not monitoring the amount of floorspace lost through office to residential conversions, could you please let me know ...

1. How much commercial office space was available in East Grinstead at the start of the plan period in 2014, and
2. How much commercial office space is available in East Grinstead now

Thank you for your help with this matter.

Roger Tullett

From: [REDACTED]
To: fenlet@yahoo.co.uk <fenlet@yahoo.co.uk>
Cc: [REDACTED]planningpolicy <planningpolicy@midsussex.gov.uk>
Sent: Thursday, 1 October 2020, 12:59:16 BST
Subject: FW: Permitted Development Rights conversions

Dear Mr Tullett,

Thank you for your email below and apologies for the delay in replying to you.

Unfortunately we are unable to provide you with the information you requested as Mid Sussex do not hold this information, as we don't hold a register of land uses or occupancy rates.

You may be able to gain more information from the County Council who currently take responsibility for monitoring employment gains/losses.

I hope this information is helpful to you.

Kind regards

[REDACTED]