LIST OF APPENDICES

RESPONSE BY RYDON HOMES LTD (516047)

MATTERS 3, 8 AND 9

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RYDON 2	-	Future Housing Requirement - Population, Household and Dwelling Requirements
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C: RYDON S.6386 WEALDEN LDF: core strategy matters 3 & 9 list of appendices 161211

RYDON 1

THE SOUTH-EAST PLAN (SEP) - KEY FACTS AND FIGURES

1. - The draft SEP was prepared by the South East England Regional Assembly (SEERA) between 2003-2006 and published on 31 March 2006.

- The draft SEP was considered by a Panel of Inspectors at an Examination in Public between November 2006 and March 2007.

- The Panel Report was published on 29 August 2007.

- The Secretary of State published Proposed Changes to the Draft Plan in July 2008.

- The SEP was adopted in May 2009.

Housing Provision

2. The housing provision figures in the SEP for Wealden District are split into:-

Sussex Coast (SC) - Policy SCT 5 - South of District
Rest of East Sussex (ROES) - Policy AOSR 5 - North of District

The plan period is 2006 - 2026

The housing provision figures for Wealden increased through the SEP process as follows:-

	SC	ROES	Total	Annual Average Completions
Draft SEP	4600	3400	8000	400 p.a.
Panel Recommendation	5600	4000	9600	480 p.a.
Adopted Plan	7000	4000	11000	550 p.a.

Reasoned Justification

3. The increased ROES provision figure was due to the potential for sustainable growth at Uckfield. (Panel Report 26.41, 26.42). The increased SC provision figure was partly a recommendation of the Panel and the Secretary of State agreed with the thrust of this change but considered that further uplift was needed for economic reasons and to meet the need for housing.

"The Secretary of State is of the view that the evidence presented during the consultation on the draft RSS and those presented for the EiP did not provide a robust justification for reducing the housing provision for the district to a level

below the RPG9/development plan based requirement. The Secretary of State;s view is informed by the following:

1. *The Panel's own reasoning against the arguments aimed at taking past under delivery as a justification for setting future requirements at a lower level (paragraphs 17.58 to 17.61).*

2. *The existing development Plan requirement (Structure Plan) is substantially higher at 880dpa for the 2006-2011 period.*

3. *The demand for future housing as indicated by the 2004 household projections are significantly high at a projected growth rate of 600 households per year.*

4. *The level of housing need is also high.*

5. *The Dec 2006 housing trajectory indicated that the projected housing completions for the first five years of the RSS (2006/06 to 2011/12) are as high as 930dpa. (The latest housing trajectory revises this upwards with a projection of 982dpa for the next five years).*

6. *Initial evidence on Hailsham/Polegate triangle area indicates significant potential for the longer term in this broad location (Panel Report 17.59)."*

Biodiversity

4. Ashdown Forest is identified on Diagram NRM2 in the SEP as a Nationally and Internationally Important Wildlife Site.

   Policy NRM5 Conservation and Improvement of Biodiversity sets out the ways that Local Planning Authorities and other bodies should avoid a net loss of biodiversity and seek a net gain.

   Ashdown Forest is identified within the broad habitat of Acid Grasslands, Dwarf Shrub Heath as an Area of Strategic Opportunity.

   Pevensey Levels are identified within the broad habitat of Coastal and Floodplain Grazing Marsh as an Area of Strategic Opportunity.

   The Thames Basin Heaths SPA is the subject of a separate Policy - NRM6.

RYDON 2

FUTURE HOUSING REQUIREMENT – POPULATION, HOUSEHOLD AND DWELLING REQUIREMENTS.

1. DCLG Household Projections 2008 - 2033

Households Wealden District

2008 - 62000
2033 - 78000

Increase 16000 households

This increase is generated by the increase in the number of household representatives aged over 65. Household representatives aged under 65 are projected to remain constant over the period.

If household requirement is crudely converted to dwelling requirement by applying a factor of 103.9% (relationship from ESCC figures – see 2 below) this would produce a Housing Requirement of 16,624 or 665 dwellings per annum in the period 2008-2033.

2. East Sussex County Council – Population, Households and Dwelling Projections (from LDF evidence base Workforce Population Projections - 5 October 2010).

	Population Change		Household Change		Dwelling Change	
	-2026	2026-2031	2006-2026	2006-2031	2006-2026	2006-2031
Policy Based	11,466	9,728	9,282	9197	9647	9559
Migration led variant	16,934	20,323	11,459	13,447	11,910	13,976
Zero net. Migration variant	- 5419	- 8115	2,607	2055	2,709	2,136

Dwelling change expressed as average annual completion rate

	2006 – 2026	2006 - 2031
Policy based	482 p.a.	382 p.a.
Migration led Variant	596 p.a.	559 p.a.
Zero net Migration Variant	135 p.a.	85 p.a.

3. 2008 ONS Population Projections ('000s)

2008 - 143.4
2015 - 147.5
2021 - 153.0
2026 - 158.4
2031 - 163.4
2033 - 165.4

4. 2010 ONS Population Projections

The projected total population of the United Kingdom at 2020 is 0.7 million (1.0 per cent) higher than in the 2008-based projections.

RYDON 3

NEIGHBOURING AUTHORITIES - PROPOSED HOUSING PROVISION COMPARED WITH SEP HOUSING REQUIREMENT

Local Planning Authority	SE Plan Housing Provision	Currently Proposed Provision	Surplus/Shortfall against SEP Provision
Brighton & Hove	11,400	9800-15800	-1600 to +4400
Eastbourne	4,800	4,782	-
Hastings	4,200	4,200	-
Lewes	4,400	4,400	-
Mid Sussex	17,100	9,800	-7300
Rother	5,600	4,536-4928	-1064 to -672
Sevenoaks	3,300	3,300	-
Tandridge	2,500	2,500	-
Tunbridge Wells	6,000	6,000	-
Wealden	11,000	8,000	-3,000
TOTAL SHORTFALL			-6572 to -12964

RYDON 4

(i) **Housing Completions in Crowborough**

2006 / 7	=	60
2007 / 8	=	58
2008 / 9	=	81
2009 / 10	=	76
2010 / 11	=	133
2006-11		**408**

(ii) Total dwellings proposed in Submission Core Strategy Policy WCS2 - 932

(iii) Balance remaining 932 - 408 = 524

(iv) Annual completion rate projected 2011 - 2030

$$\frac{524}{19} = 27.6 \textbf{ dwellings per annum}$$

Land at Walshes Road, Crowborough.

Review of the Wealden District Council Proposed Submission Core Strategy Habitats Assessment Regulations
The assessment of the increase in traffic resulting from the Wealden District Proposed Submission Core Strategy on The Ashdown Forest Special Area of Conservation and The Lewes Downs Special Area of Conservation.

Introduction.

This document has been prepared by WSP on behalf of Rydon Ltd to provide a review of the core strategy document as described above. That document has assessed the effect of new development within Crowborough and the effect of additional traffic traveling along the A26.

This review has considered the basis of assessment which has been applied and the likely effect of additional traffic associated with development to the south east of Crowborough.

The following section highlights the key issues that arise from the document.

Key Issues.

Basis of assessment.

The Core Strategy document identifies at paragraph 2.7 that the DMRB has been used as a basis for the assessment and specifically Advice note HA207/07. This Department of Transport advice note provides a scoping assessment for local air quality and identifies that such roads will not require further assessment if the scoping criteria are not exceeded. This criteria includes a limit on traffic flow increases of 1000 vehicles AADT.

This criteria has then been adopted in the Core Strategy assessment on the basis of ensuring roads affected do not experience an increase of 1000 vehicles AADT. However the assessment does not consider the impact of traffic above this level and only seeks to use the criteria for scoping as a limit to development. Accordingly there is no assessment of traffic levels above 1000 vehicles AADT.

Assessment of Allocations in Crowborough and Uckfield.

Having adopted the criteria of 1000 vehicles AADT as the maximum increase, the assessment then considers the likely flows from the allocations and commitments in Crowborough and Uckfield, but without recourse to any other areas within Wealden which may also add to traffic travelling on the key routes around the Ashdown Forest. Para 3.4 does recognise that some minor additional traffic may originate from Polegate and Hailsham, but consider this difficult to quantify.

The assessment includes trips to and from Crowborough together with Eastbourne, Lewes, Brighton, Adur, Worthing and the whole of Surrey as quantifiable and attributable to the

A26. This appears somewhat inconsistent with a view that no other settlements within Wealden will impact on the Ashdown Forest which is the premise that has been adopted for the purpose of assessment.

The assessment of housing numbers is based on the additional dwellings which have been consented or allocated but not built from 2010, and excludes those consented which have subsequently been constructed between 2006 and 2010. Accordingly the assessment does not consider the impact of the whole allocation for the period 2006 to 2030.The numbers assessed are 657 for Crowborough and 1609 for Uckfield and Maresfield. Whereas the whole allocations for Crowborough and Uckfield for the period 2006 to 2030 are 932 and 1742 respectively.

Trip rates and distribution.

At para 3.6 the assessment seeks to establish the likely daily trips per household from Crowborough and Uckfield based in part on TRICS data and then applying various factors to convert average weekdays to average daily trips, subdividing the work trips from the non-work trips. The overall figure is identified as 8.52 trips per household, these being all trips types. This figure appears to be high and no doubt is derived from historic data which does not reflect changing travel planning with greater home working etc. Accordingly it is considered that this figure over states the likely trips any new development will have on the local highway network.

These total trip types are then factored to assess those trips that leave the settlements of Crowborough and Uckfield. The census data is identified as showing that 58% of workplace trips leave the settlement with 42% retained in the settlement. Whilst this may well be appropriate to apply to the work place trips there is no relevance in these percentages to the non-work place trips. However, these percentages have then been reversed and applied to the non-work placed trips which therefore make the assumption that 42% of the non-work place trips leave the settlements. This must be a significant over estimate of the likelihood of such trips and would be against the general aims of sustainable development where trips are encouraged to travel by sustainable modes and within the local community, rather than leaving the settlement.

Many of the non-work place trips will relate to school trips, shopping or leisure trips and such trips are generally contained within the settlements such as Crowborough. Furthermore the pattern of trip movements for non-work placed trips will be very different from work placed trips. It is highly unlikely that shopping trips from Crowborough would be headed south on the A26 and much more likely to be directed toward Tunbridge Wells.

The total strategic trips, i.e. those leaving the settlement are identified as 3.88 trips per household. Base on the comments above this is a considerable over estimation of the likely trips and at most it is considered that this figure would be less than 3 trips per household. The assessment then quantifies the car based trips as 0.57 of these trips namely 2.21 trips per household. If this were correct then currently Crowborough would be experiencing 30,620 external trips per day of which 17,440 would be car based trips, leaving 13,180 trips per day by train or bus, from within Crowborough. This is based on a total household figure for Crowborough of 7892, as stated in the document. Again it is considered that the method of assessment is in error and substantively overstating the level of trips leaving Crowborough and specifically to the south.

The car trips that follow from this are identified as 1452 for Crowborough but no assumptions are made for car sharing or for some of the car trips relating to a passenger trip which will occur in practice. This in itself over states the number of car trips to the network but in practice as more sustainable travel measures are introduced especially in the context of new developments then the level of new car trips to the network will diminish.

The journey to work statistics have then been applied to establish the likely distribution of trips to the network. Appendix 2 of the document details these but again it must be emphasised that the application of work placed statistics to non-work placed trips misrepresents the likely distribution of traffic to the network.

This misguided approach to the application of trips and the subsequent distribution, suggests that of the trips to Surrey, 75%, 48 in total would travel by the A26 south of Crowborough to and from Surrey. Likewise trips to East Grinstead, Horsham, and Crawley are also shown as travelling via the A26 south of Crowbough which amount to 93 trips in total. A similar exercise can be undertaken for the trips from Uckfield which are focused toward the A26. Such a distribution is illogical and does not reflect the likely routes traffic will take, and only serves to load traffic to the A26.

As has been identified above the methodology and application of the assessment is considered to be flawed in many ways which only add to the likely increase in traffic onto the A26, and hence restrict the level of development within Crowborough.

Alternative assessment of the distribution.

Whilst it is considered that there are significant flaws in the method of assessment, if the assignment were corrected in respect to the distribution of the trips from Crowborough to locations in Surrey, east Grinstead, Horsham, and Crawley, this would reduce the flow on the A26 by 141 trips, to 307 in total. Accepting that the A26 can accommodate up to 448 trips from Crowborough this would allow broadly an additional 300 dwellings in Crowborough without exceeding the 1000 AADT flow increase on the A26. This figure would further increase if adjustments were made to the non-work place trip distribution and it was recognised that more non work place trips would be retained within Crowborough as will be the case in practise.

Summary.

In summary therefore it is considered that the criterion for assessment is misguided and merely seeks to restrict development to a limit below the 1000 vehicle AADT threshold.

In considering this assessment, there has not been any assessment undertaken beyond that of the limitation of additional traffic on the A26 to 1000 vehicles AADT. No assessments have been undertaken of the effect of higher numbers of development and hence traffic flows.

Having adopted this criteria of 1000 vehicles AADT, there are significant assumptions in the assessment which are considered to be flawed and which undermine the assessment process. This includes the wholly incorrect judgement that the distribution of non-work placed trips will mirror that of work placed trips. Furthermore it is considered that the derivation of trip numbers is incorrect and overstates the likely traffic flows, given the emphasis toward travel planning and encouraging alternative modes of transport.

However, it has been shown that if only the distribution of the trips were corrected in respect to those trips to Surrey, East Grinstead, Crawley and Horsham, this in itself would allow an additional 300 units to be allocated to Crowborough without undermining the 1000 ADDT flow increase.

In conclusion therefore the review of the assessment has demonstrated that:-

- The methodology of assessment is flawed.
- The assessment does not test the impact of higher levels of housing provision.
- Within the methodology, with the appropriate adjustment to the data, 300 additional dwellings to the south east of Crowborough can still be accommodated.

PROPOSED RESIDENTIAL DEVELOPMENT ON LAND SOUTH OF WALSHES ROAD, CROWBROGOUGH

INTRODUCTION

WSP are instructed by Rydon Homes Ltd to consider and assess the transport issues associated with the development of land south of Walshes Road, Crowborough. The assessment of this proposals over the recent years has included discussions with the County Council Highways Department together with various appraisals of the local highway network including traffic counts and parking surveys.

As part of the process of considering the impact of the development generated traffic, meetings have taken place with members of the Town Council to understand the local concerns over traffic related issues. Previous to these meetings, issues had been raised in relation to on street parking along Western Road, Whitehill Road, Fermor Road and Hurtis Hill. Accordingly, it was identified that further assessment would be undertaken of the area to assess the impact of on street parking. Subsequently further information and proposals have been submitted to ESCC for consideration including measures to Western Road and Whitehill Road. As a consequence of the information submitted to ESCC, more detail analysis has been undertaken of the use of and manoeuvring of traffic along, Western Road.

BACKGROUND DATA

Comprehensive traffic counts of the roads within the vicinity of the site in 2008, 2009 and most recently in 2011 have been undertaken.

In 2009, parking studies were undertaken along both Western Road and Farningham Road to consider the level of parking required. From this, it was identified that in the order of 71 cars were parked during the weekdays with up to 74 cars on a Saturday along Western Road. Furthermore, these studies indicated that the majority of this traffic was associated with local residents.

Base on the above survey data scheme proposals were prepared for a formalised parking scheme along Western Road which also provided regular opportunity for vehicles to pass one another. Such proposals maintained the current parking provision and sought to remove the parking on pavements which otherwise restricts pedestrian movements.

This information was shared with ESCC and their views sought. Whilst the County Highways Department have identified that they cannot object in principle to the development as stated in their email of the 13th April 2011, they required further work to enable them to support the proposals. Accordingly, it was agreed that a microsimulation model would be prepared to analyse the existing and proposed traffic. Furthermore detailed autotrack data will analyse the movement of vehicles at the identified passing locations.

LATEST TRAFFIC SURVEYS

Updated traffic surveys have been undertaken along Western Road including video data to assess the interactions of vehicles together with parking throughout the day. These surveys were undertaken over the period between the 9th and 15th July 2011 and are summarised below.

5-day Average Flows

	Eastbound	Westbound	Total
AM Peak	249	178	427
PM Peak	213	236	449
Daily Flow	2583	2315	4898

7-day Average Speed

Eastbound	Westbound
22.4mph	23.8mph

When comparing these with the 2008 data it is clear that there has not been any material change in traffic volume along Western Road.

PROPOSED ASSESSMENT

In terms of the proposed assessment, a microsimulation model has been prepared to consider the existing traffic and effect of parking along Western Road. This base model has been calibrated and verified against the video surveys undertaken at the time of the traffic surveys.

Following on from this, the proposed model has also been prepared for the proposed parking strategy for Western Road and formalised passing locations. The base traffic flows have been assessed in this model and compared with the base situation. Beyond this additional traffic has been added to the model to reflect development to the southeast of Crowborough at varying levels and based on the likely distribution from the development onto the local highway network. The trip rates reflect those previously submitted to the County Council and generally reflect in the order of 60 two-way trips in the peak hour for every 100 dwellings. These trips have then been assigned to the network based on traffic flow data and local census information which identifies the likely movements toward the A26, Crowborough Town Centre and areas to the east including the railway station.

The modelling has been sent to the County Council to agree the technical basis of assessment and ongoing discussions are taking place on this assessment..

SUMMARY

In summary therefore, there have been a number of surveys of the traffic along Western Road and consideration as to how best to accommodate the parking requirements. ESCC raise no objection in principle to an additional 300 dwellings at SE Crowborough. To analyse the proposals and the base situation, a paramics microsimulation model has been prepared to assess the effects of the parking proposals. This approach is agreed with ESCC as Highway Authority.

Attached Message

From: Alex Jack <Alex.Jack@eastsussex.gov.uk>
To: A'lee, Melanie R <m.alee@w aterman-group.co.uk>
Subject: RE: Walshes Manor Farm - Western Road
Date: Wed, 13 Apr 2011 17:26:40 -0000

Melanie,

Apologies for the delay in responding. There have been lots of internal deliberations about how to respond to this.

At this stage I cannot object in principle to the proposed development. If this site were to come forward for development, a significant amount of work would be required to enable me to support a planning application.

Below are some comments in response to your letter of 1st February 2011, and general comments regarding this proposal.

- The junction assessment is generally acceptable but further work will obviously be required to accompany a planning application
- All assesment work will have to include establishing the operating capacity (reduced because of the parked cars), but will need to take into account the effect of the increase in traffic on the environment of the road and the residents.
- With regards to the rearranged parking, it is my opinion that shorter stretches of parking will be preferable to reduce waiting times for motorists.
- Your statement regarding the off peak parking provided across accesses is incorrect. It is an offence to block somebody in their property by parking across an access, but not to block somebody out of their property. This could result in additional parking needs in Western Road if people return to their property in the evening but are unable to access their off street parking. Double yellow lines should be provided across all accesses. This may result in the need to provide additional parking elsewhere.
- Assessment will be required of the number of queuing vehicles at the time of any application that may be submitted. The same goes for junction assessment.
- The accident data does not show up any major issues in the vicinity of the site.
- I would imagine that it will be likely that mitigation will be required. This could be in the form of hard measures such as highway improvements, or improvements to bus services to increase the sustainability of the development.

Overall, this development could potentially be acceptable but will be subject to significant further work to demonstrate this. Obviously the final yes or no will be dependant on the planning application that is submitted. I cannot give anymore of a positive response than that at this time.

Regards,

Alex Jack MCIHT

Principal Transport Development Control Officer
Transport Development Control | Economy, Transport & Environment | East Sussex County Council
County Hall | St Anne's Crescent | Lewes | BN7 1UE
☎ 01273 482284 | 07879 117397

From: A'lee, Melanie R [mailto:m.alee@waterman-group.co.uk]
Sent: 01 February 2011 17:02
To: Alex Jack
Cc: Claire Warwick; Mike Jones (mjones@rydon.co.uk); Christopher Hough (sigmaplan@AOL.com); Plumb, Brian R H
Subject: Walshes Manor Farm - Western Road

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Alex, further to your email dated 8th December, please find attached my response and accompanying drawings/ capacity analysis etc. It would be appreciated If you could review the attached and provide me with a response as soon as possible as publication of the Wealden draft core strategy is imminent. A hard copy of this letter and drawings will follow in the post.

RYDON 7

WEALDEN DISTRICT COUNCIL LDF

CORE STRATEGY DPD

INFORMATION STATEMENT

LAND AT WALSH MANOR FARM AND ORCHID RIDING CENTRE, SOUTH OF WALSHES ROAD, CROWBOROUGH

1.0 **Background** - this statement provides an overview of the case for land at Walshes Farm, Crowborough, to come forward as a housing land allocation in the emerging LDF.

1.1 A preliminary promotional statement was submitted on behalf of Rydon Homes Ltd to your Planning Policy Team in August 2008. This included an initial Transport Assessment, Landscape and Visual Appraisal Assessment, Sustainability Assessment and Comparative Site Assessment by way of contributions to your Core Strategy evidence base.

1.2 As Officers have determined not to engage in discussions with the promoters of land, it has, regrettably, not been possible to discuss these report findings in greater depth with you.

1.3 Accordingly this submission now seeks to re-focus Officers' and Members' attention on the merits of this site and development location and to present an update ahead of the presentation of the draft Core Strategy to LDF Sub-Committee on 7th July. It is hoped that this appraisal will prove helpful and will lead to the identification of South Crowborough as a broad location for new strategic housing development in the draft Core Strategy document. The area can support a range of housing numbers and flexibility is one of the key attributes of this potential development location.

2.0 **Scale of Development** - the Core Strategy is being produced at a time of uncertainty about the total housing numbers that will have to be accommodated in the District. The current baseline is the South East Plan provision figure of 11,000 dwellings. However, the Conservative Party has proposed to abolish regional spatial strategies and housing targets if it forms a Government after the General Election.. Alternatively the review of the South East Plan is anticipating higher population growth levels and future housing provision may increase in line with current NHPAU predictions. Against this background the need for a clear spatial strategy or distribution framework with flexibility of numbers in each location seems to be of paramount importance if the CS is to be meaningful and long-lasting.

3.0 **Spatial Strategy** - there are a number of considerations including:-

3.1 **South v North of the District** - the south arguably has fewer landscape constraints, but there are key infrastructure issues, particularly highways and drainage, the market demand is less robust and Pevensey levels SAC requires consideration. There also tends to be a greater focus upon the coastal towns for employment and higher order facilities. The northern part of the District is constrained by the AONB and, most recently, the Ashdown Forest SPA. The focus is on the main towns of Uckfield and Crowborough and, further afield, Gatwick/Crawley, East Grinstead, Tunbridge Wells and commuting to London. A rough balance North and South seems to be an appropriate strategy in these circumstances.

3.2 **Urban v Rural** - the achievement of sustainability principles clearly requires a focus on urban areas where public transport and key facilities are more readily available. Some limited expansion of larger villages can be justified to meet local needs and to assist with maintaining the rural economy and village vitality. However, sustainability and consistency with the Regional Spatial Strategy inevitably require an urban focus to be selected.

3.3 **Uckfield v Crowborough** - Uckfield is heavily constrained by flooding, traffic congestion in the town centre and proximity to the Ashdown Forest SPA which is particularly affected by traffic along the A22 road corridor. This issue, led by the concerns of Natural England, precipitated the abandonment of the East Grinstead Western Relief road and associated strategic housing development at East Grinstead. Similar considerations must apply at the other end of the corridor in Uckfield where the propensity of traffic to travel up the A22 to East Grinstead and the Gatwick growth point is a major consideration that reduces the growth potential of Uckfield. Both Crowborough and Uckfield fall within an area where SANG provision will be required to accompany new housing development in the future.

3.4 Crowborough is constrained by the AONB around its northern perimeter and the Ashdown Forest to the west. However, there are areas of attractive but lower order landscape to the south of the town that have considerable development potential. Crowborough has a strong housing market and has no generic problems of flooding or severe highway congestion. It has a strong social and economic structure and has few infrastructure problems. There are three major supermarkets together with a wide range of convenience and comparison shops in the town centre and the local centre of Jarvis Brook, where there is also local employment. There is a railway station at Jarvis Brook with hourly connections to London and Uckfield. Crowborough is therefore a strong candidate for strategic housing growth in the north of the District – in our view it is a clearly preferable location to Uckfield.

3.5 The recent housing need survey estimates that there is an affordable housing need for 120 households per annum in Crowborough. This equates to 2400 dwellings over the SEP plan period. Significant strategic housing provision is required to even go some way to meeting this need.

3.5 As has been identified Uckfield does suffer with traffic congestion within the Town Centre and along Bell Lane which restrict access to the centre and also to the employment areas to the west of Uckfield. The issues of traffic congestion

within Crowborugh are not to the same level as that in Uckfield with a variety of routes serving the Town Centre within Crowborough. A comparison of travel statistics for work place trips as taken from the Census data shows that bus and train travel within Crowborough is almost three times that of Uckfield, (Crowborough: Bus 7% , Train 3%. Uckfield: Bus 2.5%, Train 1%). Clearly therefore Crowborough offers a better base to develop and improve sustainable transport initiatives.

4.0 **Where in Crowborough?** - the recent SHLAA exercise has identified the potential for a total of 2,366 dwellings on sites in and adjoining Crowborough in the period 2014 - 2026. This provides scope for a range of housing numbers to be directed to the town. The availability of developable sites is therefore not a constraint upon the spatial strategy selecting Crowborough as the main strategic housing location in the north of the District.

4.1 Surprisingly some sites within the SHLAA are identified on the northern side of the town within the AONB. This is not inappropriate for the SHLAA exercise, which is policy neutral, but to direct strategic development to areas within or sensitively adjoining the AONB and in close proximity to the Ashdown Forest would be contrary to National Policy guidance when other sites are available outside the AONB. Selection of sites on the northern side of the town would put the CS at risk of failing the test of soundness that requires compliance with National Policy and Regional Policy.

4.2 **South Crowborough** - the main advantages of South Crowborough as a development location include:-

- it is not within the AONB and there is therefore no conflict with national policy;
- it is not in close proximity to the Ashdown Forest SPA. Local residents would not walk to the Forest with their dogs.
- the railway station at Jarvis Brook is easily accessible by bus, walking or bicycle;
- Jarvis Brook provides employment, significant local retailing - including most recently a major supermarket - and other key local facilities;
- it is a sustainable location and new development could make it even more sustainable by the enhancement of public transport, pedestrian and cycle links and other measures that would benefit new and existing residents alike.

4.3 There is clearly a local concern in Crowborough about the adequacy of the local road network in terms of:-

- parking and movement of traffic in Western Road and Whitehills Road
- access to the town centre
- access to Tunbridge Wells.

4.4 These concerns are assessed in the attached Statement from Waterman Boreham Ltd which demonstrates that they are not primarily safety or capacity issues. They can be addressed by traffic management quite effectively and the resulting improvements will benefit the wider area compared with the existing situation. Highway issues are therefore not a constraint on the suitability or capacity of South Crowborough as a strategic housing location and in fact new housing development would fund management measures to resolve local concerns

5.0 **Land at Walsh Manor Farm and Orchid Riding Centre** - this is one of a number of developable sites shown in the SHLAA in the area south of the town. The main advantages of the site over other potential sites are:-

- the SHLAA appraisal identified no major constraints - particularly no landscape constraint;

- it is controlled and is being actively promoted by a local developer with a track record of delivering housing in the District and adjoining Districts;

- it is capable of providing a range of housing numbers

600	-	as identified in the SHLAA (site reference 151/1110)
100-150	-	by developing the eastern side focused on the existing riding school
150 - 200	-	by developing the western side only and flanking existing development at Alderbrook
250-350	-	by developing both these areas.

These options are shown on the attached plan.

- A strategic allocation in this allocation could deliver a SANG with the capacity and characteristics to address the Natural England requirements for the development numbers proposed and also some additional development capacity as well. A plan showing the area concerned, some photographs and a list of SANG compliant features is attached.

- In addition to its role as a SANG to protect the Ashdown Forest SPA the area could function as Accessible Natural Greenspace (ANGSt), available to the whole of Crowborough and in line with emerging Natural England policy on open space provision.

5.1 For these reasons land at Walshes Farm is uniquely able to meet the requirements of any new strategic housing allocation. It is submitted that no other site can match the site's potential in this respect.

6.0 **Conclusion** - Land south of Crowborough should be identified as a broad location for strategic housing growth in the Core Strategy. The location is capable of delivering a range of housing numbers, depending upon the District-wide housing requirement and therefore provides flexibility of numbers but should be identified now as a suitable location in terms of the spatial strategy for the District over the Plan period.

C: RYDON S.6366 South of Walshes Road Crowborough: Wealden dc information statement 280410

Land at Walsh Manor Farm and Orchid Riding Centre – Site quality and suitability for a SANG provision

1. **Scale**
    a. There is land available to meet SANG requirement generated by the proposed development even in its largest form.
    b. In addition there is also potential to provide land to assist other development proposals in the locality in meeting it's SANG requirement.
    c. It is possible to provide a circular walk of 2.3-2.5kam around the SANG
    d. Potential to provide a SANG larger than 12ha to provide a variety of habitats

2. **Car parking**
    a. Proposed residential development is within 400m of the proposed SANG i.e. within walking distance
    b. Sufficient land also available to provide parking to serve the wider community - this would reflect the size and anticipate use of the SANG.

3. **Accessibility**
    a. Proposed SANG easily accessible by vehicles or on foot utilising existing footpath networks, of which there are a number in the vicinity.

4. **Habitats**
    a. Variety of habitats ranging from open grassland to woodland and water features.
    b. Site provides a naturalistic space from stream side woodland to open ridge line landscape with extensive views.

5. **Unpleasant intrusions**
    a. No unpleasant intrusions (e.g. sewage treatment works smells etc).

6. **Security**
    a. Safety and security will from any part of the design

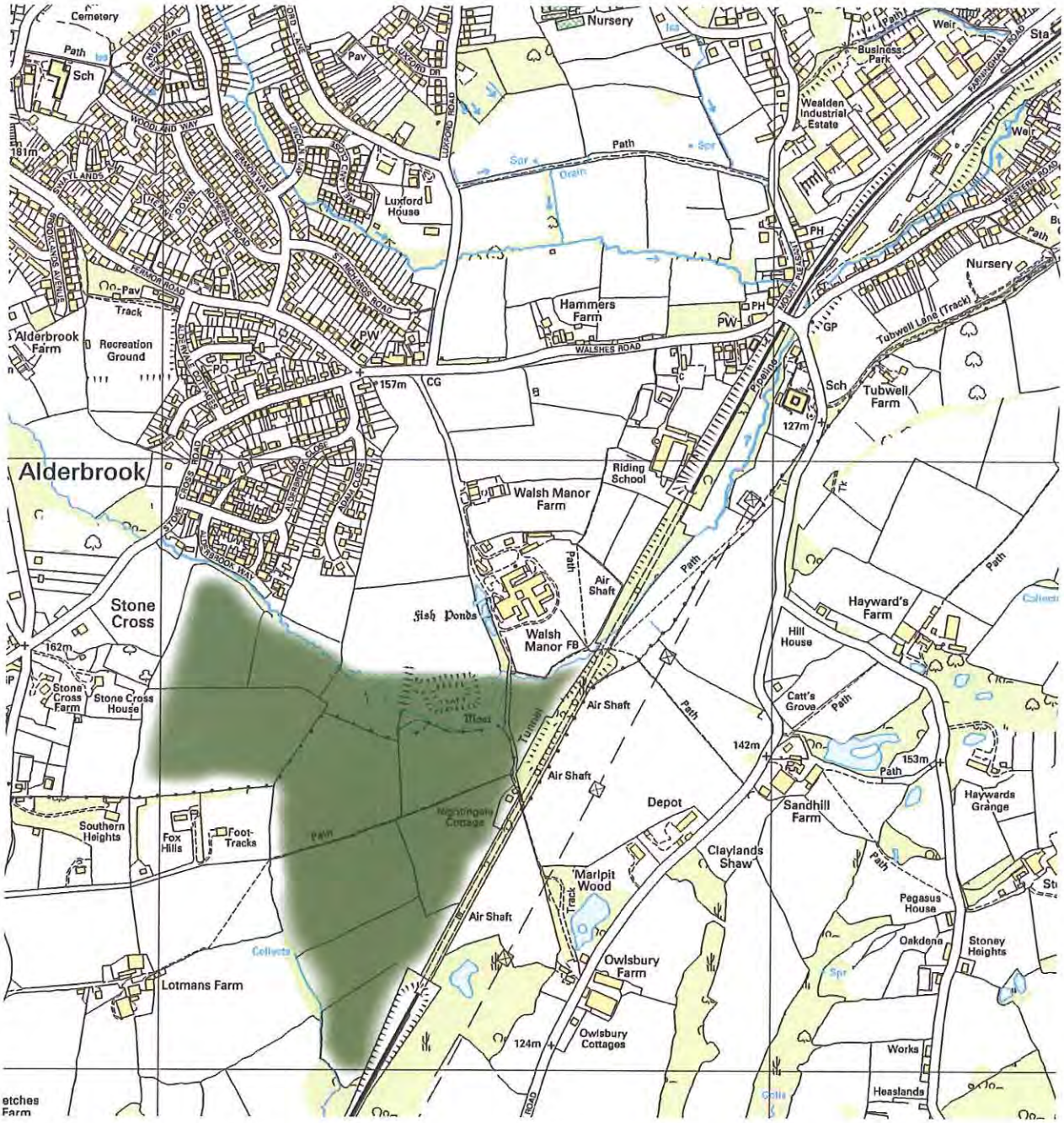
7. **Semi-natural Spaces**
    a. Proposed location rural in character with little intrusion from artificial structures.
    b. Railway line in close proximity, however impact on SANG minimal as positioned under a tunnel in this location

8. **Dogs**
    a. Area largely unrestricted with plenty of space for dogs to exercise freely and safely off the lead.

9. **Characteristics**
    a. Site undulating and varied topography
    b. Sense of openness and tranquillity
    c. Long distance views across the High Weald to the South Downs

10. **Biodiversity Enhancement**
    a. Scope for natural interest and enhanced biodiversity

Potential Area for SANG Provision

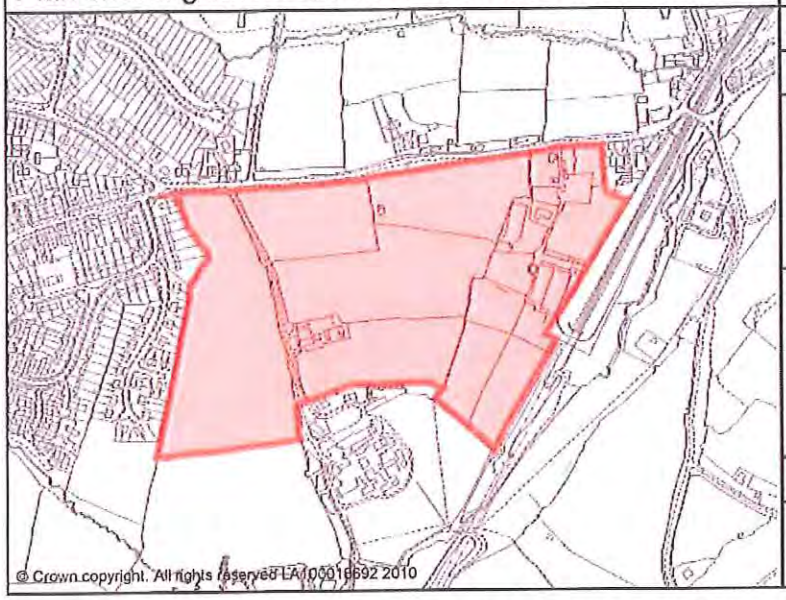


Southerly Views from Public Footpath along Potential SANG Area





Wealden SHLAA - Potentially Suitable Sites Summary

Plan showing whole extent of submitted site	Site Reference: **151/1110**
	Settlement: Crowborough
	Parish: Crowborough
	Address: Land south of Walshes Road, Crowborough
	Current use: Agricultural land/Riding School
	Submitted site area (ha): 15
	Indicative developable area (ha): 15

N.B. The SHLAA has been conducted in advance of decisions on the planning strategy in the LDF

Suitability summary	Development on the site should be capable of being well integrated visually into the existing settlement and should have minimal landscape impact. A development of this size however will require substantial additional landscaping to reinforce boundaries and create green networks through the development. The site is not currently accessible by vehicles. Potential vehicular access exists directly onto Walshes Road, however significant works would be necessary in order to provide appropriate visibility splays, particularly because of the sloping nature of the landform. A full transport assessment would be necessary to measure the impacts of development on the highway network locally and to ensure good connectivity with the town centre, and support the creation of a genuinely sustainable town extension. Although this site may be suitable in its own right, should development be proposed in the Council's LDF, there would be the need to consider this site comprehensively with adjacent land, also submitted through SHLAA, and against an assessment of the overall impact that the scale of development may have on the town.
Availability summary	The site has four owners, with control by a single housing developer. There are no known legal constraints relating to the land and consequently, the site is assessed as being available for the delivery of housing.
Achievability summary	Attractive edge of town location where market demand is high. Site is green field and whilst part of the site is sloping and as such, site preparation costs are assumed to be high, the high yield of housing potential on this site would offset these costs. The site is assessed as suitable, available and economically viable (achievable) with the capacity of a developer to complete and sell the housing in this area considered to be good. Subject to development plan policy, there is a reasonable prospect that in the medium to long term, the housing potential on this site could be delivered. Current wastewater constraints at Redgate Wastewater Treatment Works (which serves this part of Crowborough) would prevent housing delivery in the short term.

Wealden SHLAA - Potentially Suitable Sites Summary

Strategic infrastructure	It is possible that wastewater treatment capacity for a further 1880 new homes (post 2014) may be accommodated at Redgate Wastewater Treatment works, subject to funding by Southern Water to increase treatment capacity to match Environment Agency Consent. Constraints at St. Mary's Primary School may be able to be overcome through developer contributions.

Indicative housing density (dph): 40 dph

Deliverable net dwelling capacity (years 1-5): 0

Developable net dwelling capacity (years 6+): 600

Total net dwelling capacity: 600

Alternative Smaller Development Options

