From:

Councillor Mrs. Sylvia Tidy & Councillor Richard Stogdon
County Councillors for the Crowborough Division of East Sussex County Council

Councillor Major Antony Quin RM & Councillor Mrs Diane Phillips
District Councillors for the Crowborough West Ward of Wealden District Council

Councillor Neil Waller & Councillor Mark Weaver *
District Councillors for the Crowborough North Ward of Wealden District Council

Councillor Jim Hollins
District Councillor for the Crowborough St John's Ward of Wealden District Council

Councillor David Larkin & Councillor Carol Reynolds
District Councillors for the Crowborough East Ward of Wealden District Council

Councillor Stephen Isted
District Councillor for the Crowborough Jarvis Brook Ward of
Wealden District Council

Councillor George Moss
Chair of Planning of Crowborough Town Council
and
Town Councillor for Crowborough North Ward.

To the Chief Executive Officer
Wealden District Council
Council Offices
Pine Grove
Crowborough
East Sussex
TN6 1DH

10th May 2012

Dear Sir,

Crowborough – Modifications to the Core Stategy Development Plan Document

In our capacity as elected members of the three tiers of Local Government representing Crowborough, we write in response

(1) to the Wealden District Council Local Development Framework - Strategic Sites Development Plan Document, Issues & Options Consultation Paper,

(2) to the letter dated 5th March 2012 from the Inspector Michael Moore BA (Hons) MRTPI CMILT MCIHT to Mr David Phillips of Wealden District Council in the relation to the Wealden District Core Strategy and

(3) to the District Council's Local Development Framework Proposed Modifications to the Core Strategy Development Plan dated April 2012.

Firstly, we welcome the new draft Local Development Framework for Wealden and recognise the detailed and extensive work performed by officers in its preparation. While we have significant concerns relating to the paucity of land provision in the document for increased commercial premises and centres of employment in Crowborough, we welcome the increased housing provision for the town, as being both necessary and desirable.

SDA8 & SDA9 – Land at Pine Grove & Jarvis Brook

Secondly, in regard to Crowborough, we welcome the Inspector's endorsement of the guiding principles as set out in the District Council's Local Development Framework Issues & Options Consultation Paper at SDA8 in relation to Pine Grove and at SDA9 in relation to the land comprised at the Jarvis Brook Depot. It seems to us that these sites offer a welcome opportunity for suitable residential development.

However, we have substantive reservations in regard to the designations of the land (1) at Palesgate Lane and (2) at the Millbrook Garden Centre as detailed at SDA9.

Palesgate Lane - our view is that the designation of this land for residential development is misdirected. The surrounding land at this location has been developed and is now occupied by industrial or quasi-industrial units. Both on grounds of (1) felicitous planning and (2) a poor road and transport infrastructure obtaining in this location, we think the Palesgate Lane land (as detailed at SDA9) should not be designated for residential development and detracts from the quality of the Core Strategy.

Millbrook Garden Centre – we think the topography of the land at this location makes it generally unsuitable for the kind of housing development proposed. We are equally concerned about the indicative access arrangements at this site, having regard

(a) to the proximity of the bend and junctions with Mottins Mill and Western Road on the B2100 to the east and

(b) the junction with Sybron Way with the B2100 to the west. Access arrangements to this site via Mottins Hill and Tubwell Lane would be (and indeed are) even less satisfactory.

SDA10 – South-east Crowborough Sub Areas

Of greatest concern, however, is the proposed designation set out at SDA10. The parcels of land, variously coloured and labelled A-I at SDA10 comprise approximately 118½ acres, bounded on the south by Walshes Road, on the west by Luxford Road, only at certain points on the east by Tollwood Road and, finally, intersected towards the north, again at certain points, by Blackness Road. The issues and options paper indicates a provision of the order of 160 houses on the land detailed at SDA10. In relation to these particular sites:

1. While, on one view, these sites appears to link in well with the land previously developed on the south side of Crowborough, on both the eastern and western aspects of the various parcels, the inconsistent and

limited quality of the road and transport infrastructure and the connecting junctions in this vicinity of Crowborough renders substantive development here most unsuitable both in the short and longer terms. On a conservative view, by reference to the TRICS Database calculations, this is likely to generate and release onto the existing Crowborough transport network something between 1,000 and 1,400 additional journeys per day.

2. Even were very substantive improvements to be made to the roads in the immediate vicinity of the land designated in SDA10, account needs to be taken of the restricted nature of the connecting road infrastructure, particularly (1) at the south-western end of Western Road and along Western Road itself, (2) along Fermor Road, Hurtis Hill and Sheep Plain and (3) along the linking routes between any development on the land designated at SDA10 with Crowborough Town Centre, particularly Whitehill Road.

3. Detailed conversations with officers of the Economy, Transport & Environment Department of the East Sussex County Council to review the possibility of making substantive improvements to the existing road infrastructure, extending from Rotherfield Road and Western Road at the south-eastern end of Crowborough, along Walshes Road, Fermor Road and more particularly Hurtis Hill leading to Sheep Plain at the south-west of the town, have not pointed in the direction of any particularly positive outcome. While it may be possible to make some minor improvements to some of the various junctions, there is no reasonable prospect of there being any significant new infrastructure in regard to the network of roads leading from the southern part of Crowborough to the centre of the town.

4. The attention of the District Council and the Inspector is drawn to two fairly recent decisions of the Inspector under the application references WD/626/CM, WD/09/2365 and WD/619/CM upholding decisions to refuse applications in relation to development at the Goods Yard at Western Road, Jarvis Brook. The comments of the Inspector, who reviewed the County Council decisions in regard to Western Road, should be particularly noted. Cf paragraphs 18 & 19 of the report of the relevant Inspector under the Appeal Decision Reference APP/G1440/A10/2141518.

5. In correspondence and meetings with many Crowborough residents, our attention, and, for that matter, that of our predecessors, as Councillors, has been consistently drawn to the incapacity of an inherently poor road and transport infrastructure in and around the southern part of the town to deal with steadily increasing traffic volumes.

“Contingency Land” North of the A26 in North-east Crowborough

It is understood that, for all the reasons cited in the five preceding paragraphs, the District Council quite rightly included in the Context Plan for Crowborough at Figure 11.1 of the Issues and Options Consultation Paper (at page 163) an alternative contingency site to the north of the A26.

We fully understand what is said by the Inspector in paragraph 26 of his letter dated 5th March under the heading, "Development in the High Weald AONB" and concur with the view that, "Major developments should not take place in these designated areas except in exceptional circumstances…" and .."should be demonstrated to be in the public interest". However, we are firmly of the view that the severity of the road infrastructure problems obtaining in relation to any proposed substantive residential development to the south of Crowborough, fully justify the inclusion of the contingency land to the north of the A26. Further, in our view, the background circumstances obtaining here are indeed the kind of exceptional circumstances in contemplation in the drafting of PPS7 and now incorporated in the National Planning Policy Framework, to which we shall later refer.

More specifically, we take particular issue with what is said by the Inspector at paragraph 28 of his letter. Here he says, inter alia, "but in any event there is evidence that there is a reasonable prospect that the traffic implications of the scale of development proposed in Crowborough, which were the main reason for the contingency site, can be addressed."

The only evidence before the inquiry in respect of road traffic alleviation or management schemes was in relation the submission on behalf of Rydon Homes for SDA10. This evidence was reviewed by the Transport & Environment Department of East Sussex County Council prior to the enquiry and found lacking. It was also reviewed in some detail by the Planning Committee of Crowborough Town Council. The work was found by both bodies to have, at best, a neutral implication effect and, at worst, to be based on a number of incorrect assumptions re. parked vehicles and traffic volumes. More particularly, the County Council specifically directed the proposed developer that considerably more work would have to be carried out before any weight or approval could be attached to the developers' scheme. Significantly, no such work has been submitted to the County Council for consideration.

Referring more specifically to the "Contingency Urban Extension North A26 (Residential Provision) ("the Contingency Land") identified in the Strategic Sites Development Plan document at page 205, we appreciate that it has not been possible for the District Council to carry out the detailed appraisal of the effect of development of this site in the AONB having regard to the provisions of PPS7 and the National Planning Policy Framework (NPPF). However, we are firmly of the view that such work should be carried out having regard to the inherent unsuitability of development of the land identified at SDA10 for the reasons cited above.

We further think that, against the criteria set out in paragraph 116 of the NPPF, it shall be possible for the District Council to show that it acted correctly in including the Contingency Land at Crowborough in the draft Core Strategy. We say this having regard to the Council's preferred policy of confining development in the High Weald at key settlement locations (as opposed to a dispersed settlement location approach outside the main centres of population) and in the exceptional circumstances obtaining here in regard to lack of alternative suitable locations for residential development in Crowborough.

It is our sincere hope that the District Council and the Inspector shall give close consideration to the representations made here in the interest of achieving appropriate residential development in Crowborough.

Yours faithfully

Councillor Mrs. Sylvia Tidy	Councillor Richard Stogdon
Councillor Major Antony Quin RM	Councillor Mrs Diane Phillips
Councillor Neil Waller	Councillor Mark Weaver *
Councillor Jim Hollins	Councillor David Larkin
Councillor Carol Reynolds	Councillor Stephen Isted

Councillor George Moss

* Councillor Mark Weaver dissenting in regard to the paragraphs on page 2 relating to Policy SDA9 (Land at Palesgate Lane and Millbrook Garden Centre).