CROWBOROUGH TOWN COUNCIL

Wealden District (Incorporating part of the South Downs National Park) Representation on the Proposed Modifications to the Core Strategy

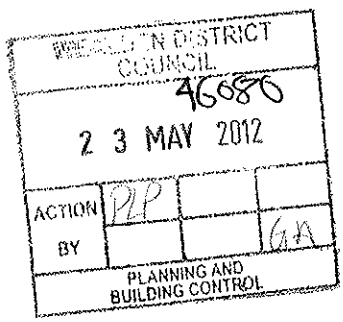
Wealden District Council

Working in Partnership

South Downs National Park Authority

This response relates to the proposed modification	
MM 34	**WS 9 and 40**
(Please add numeric reference e.g. MM22 or Wealden District Council/ South Downs National Park Authority modification WS e.g. WS 23)	

Declaration:	I consider the proposed modification will assist the submitted Core Strategy to be found sound ☐ /unsound ☒ (*place a cross in the box to show which option you have chosen) for the following reasons:



Reasons Given:	Overview 1. This paper sets out the response of Crowborough Town Council (CTC) to the proposed modifications to the Wealden District Core Strategy (WDCS) made by the Inspector, Mr Michael Moore, in his letter to Mr David Phillips of Wealden District Council (WDC), dated 5 March 2012. 2. We welcome the new draft WDCS as the strategic development document of the Local Development Framework (LDF). We do not object to the quantum of development suggested in the CTC area, which we believe balances the constraints around the town with the needs of our community. However, we have significant concerns about the Inspector's comments insofar as they impact on specific locations for future housing provision in Crowborough, as set out in para 28 of the Inspector's letter, and about the remit of the WDCS document as a means of allocating sites for future development (see para. 4 below). 3. CTC's comments can be summarised as follows: • We fully accept the need for further residential development in appropriate locations to allow future growth in the Crowborough area, and for a sound and robust strategy to achieve this. • We are strongly opposed to the Inspector's proposal to delete the Contingency Site north of the A26. This is a far more sustainable site than the inappropriate locations SDA 9 & 10, and, together with developments at the Pine Grove site and the Jarvis Brook secondary centre, would meet the existing growth target. Furthermore, the Inspector's proposed modifications run counter to the principles of the government's commitment to localism in resolving planning matters. CTC is concerned that the Inspector's proposals could lead to significant and irreversible harm to Crowborough, whereas CTC's proposals would provide the basis for a sound and sustainable development plan which would enhance the local environment and economy. • We remain deeply concerned about the detrimental transport impacts of the Inspector's preferred development sites. We have seen no convincing evidence that these transport implications can be addressed, as the Inspector assumes. We are actively considering carrying out further transport studies, which are vital in order to find a solution to the problem. • We are also concerned that there is little consideration in the Core Strategy for increased commercial and business development in Crowborough. 4. The Inspector suggests that his proposed modifications are needed to enable WDC to develop a 'sound' Core Strategy document. However, our understanding is that the Core Strategy is not intended to be a document that allocates specific development sites, and that this will be done through a later Development Plan Document. The purpose of the Core Strategy is to set targets for development and the broad locations for that development. WDC have chosen to do that through Strategic Development Areas (SDAs). It is our view that some of the sites comprised in the SDAs are not appropriate for allocation for the reasons set out below; we have not sought to comment in detail on these sites through the Core Strategy process, as we understood that this was to take place during preparation of the Strategic Sites Development Plan Document (SSDPD). 5. We are concerned that the Inspector's proposed modifications effectively allocate these sites as they remove alternative locations, specifically the contingency site, which we believe are more sustainable and more appropriate for the development of the town. We believe that WDC's approach is sound and should be upheld by the Inspector, allowing allocation of sites through the appropriate document at a later stage. 6. We note that current government policy, including the recent National

WEALDEN DISTRICT COUNCIL
23 MAY 2012
ACTION
BY
PLANNING AND BUILDING CONTROL

Planning Policy Framework (NPPF) seeks to promote localism and encourage local communities to plan positively for sustainable development. Para. 17 of the NPPF sets out the twelve principles of planning, including 'empowering local people to shape their surroundings, with succinct local and neighbourhood plans to set out a positive vision for the future'. As the Planning Minister, Greg Clark MP, stated in the House of Commons on 24 April 2012, 'part of the purpose of our reforms is to move away from the situation in which decisions taken locally are overturned by the Planning Inspectorate.' We are keen to work closely with WDC to ensure that appropriate sites can be found for development that meets the needs of Crowborough, particularly through the SSDPD.

7. Advantages and disadvantages of possible alternative SDAs

7.1. Development area SDA9: Millbrook Garden site

7.1.1. We fail to see how this site could be considered for housing provision for two reasons:

- The site currently supports an active and expanding business which is a valuable part of Crowborough's community and economy
- The site's topography does not lend itself to housing development, and is unlikely to be a viable economic proposition.

7.2. Development area SDA9: Palesgate Lane site

7.2.1. The land in and around this location has been developed for industrial and light commercial use which currently creates problems for the existing road infrastructure. Further development for housing would therefore be inappropriate, as it would further burden the road infrastructure.

7.2.2. We suggest this site could be kept back for further business and commercial development in the future, rather than developing it for housing, especially given the potential conflicts between these uses.

7.3. Development area SDA10 (A-1): land bordered by Walshes Road (south), Luxford Road (west), Tollwood Road at certain points (east) and Blackness Road, at certain points (north)

7.3.1. It is the CTC's considered view that no development in these locations should be considered for inclusion within any sound development plan. The road infrastructure in and around Western Road, Whitehill Road, Alice Bright Lane, Sheep Plain and Walshes Road cannot manage current traffic requirements; it would be unable to support any further substantial housing development without severe detriment to local residents and to traffic movements in and around the proposed development areas.

7.3.2. We strongly believe that the Inspector is misguided in his belief that there is a viable plan to mitigate the traffic problems in this area.

7.4. Contingency Site (north of A26)

7.4.1. CTC does not wish to prevent further beneficial appropriate housing development within the town. However we are of the firm opinion that development should be in areas that are sustainable and appropriate, and with that in mind we believe the Inspector should reconsider his dismissal of the Contingency Site to the north of the A26, which was originally included in the WDCS specifically in the eventuality that traffic and congestion problems associated with development of SDAs 9 and 10 proved unsustainable, as we contend is the case. CTC is currently considering commissioning further traffic studies to explore the likely implications of such development that can feed into the SSDPD.

7.4.2. Whilst the Contingency Site is within the Area of Outstanding Natural Beauty (AONB) it is a far more sustainable site than the Inspector's preferred options, with significant advantages for the future development of

DISTRICT
CIL
23 MAY 2012

Crowborough as a town. Specific benefits of the Contingency Site include:

- direct access to the A26
- proximity to the town centre shops and facilities
- easy access to current frequent bus services
- the need for little or no alteration to the existing road infrastructure.

8. CTC's proposal for future housing development

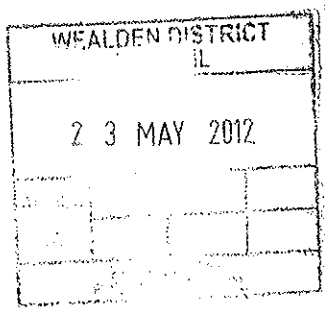
8.1. It is for the reasons set out above that CTC requests that, rather than dismiss it entirely, the Inspector should upgrade the Contingency Site to SDA status and use it to replace the inappropriate locations in SDAs 9 and 10. WDC can then determine which sites are most appropriate for allocation in the forthcoming SSDPD.

8.1.2. This site, coupled with development south of the Pine Grove land allocation, would meet the proposed housing needs for Crowborough identified in the WDCS. Furthermore, development in these areas would be most appropriate in terms of providing for the future development and improvement of the town centre.

9. Commercial and business development in Crowborough

9.1. CTC is concerned that the current WDCS includes little or nothing about provision for the further development of business and commercial facilities in Crowborough, and indeed seeks to satisfy the need for residential development at the expense of such land allocation. In particular, the sites at Palesgate Lane and Millbrook Garden Centre should not be allocated for residential development, given their potential for employment-generating uses.

WEALDEN DISTRICT COUNCIL
23 MAY 2012
ACTION



If this is a new matter that you have raised please complete the following

I wish ☒ / do not wish ☐ (*place a cross in the box to show which option you have chosen) for this matter to be heard in front of the Inspector

Signed:	

Name and Address:	PHILIPPA HEWES (TOWN CLERK) CROWBOROUGH TOWN COUNCIL
E-Mail Address:	
If on behalf of a company, please state:	Crowborough Town Council
Date:	22/5/2012

Please place a cross in the box to show which option you have chosen	
I would wish to be notified of the publication of the recommendations of any person appointed to carry out an independent examination of the Core Strategy	Yes ☒ No ☐
I would wish to be notified of the adoption of the Core Strategy	Yes ☒ No ☐

Note: If completing this in hardcopy form, please use additional sheets if necessary.

Please return this form by **5pm on Wednesday 23rd May 2012**:

By post to: Head of Planning and Environmental Policy, Wealden District Council, Freepost SEA 10959, Crowborough, East Sussex, TN6 1BR

By email to: ldf@wealden.gov.uk

Data Protection Act 1998 and Freedom of Information Act 2000
Representations cannot be treated in confidence. Regulation 30 of the Town and Country Planning (Local Development) (England) Regulations 2004, as amended, requires copies of all representations to be made publicly available. The Council will also provide names and associated representations on its website but will not publish personal information such as telephone numbers, e-mails or private addresses. By submitting a representation on the Proposed Modifications you confirm that you agree to this and accept responsibility for your comments.

Please telephone 01892 602007 or e-mail ldf@wealden.gov.uk if you require assistance in submitting your representation or if further information is required. If you, or somebody you know, would like the information (guidance notes, forms etc) in large print, braille, audio tape/CD or in another language please let us know.