Wealden District (Incorporating part of the South Downs National Park) Representation on the Proposed Modifications to the Core Strategy – National Planning Policy Framework Presumption in Favour of Sustainable Development

Wealden District Council

Working in Partnership

South Downs National Park Authority

This response relates to the proposed modification WS	
Declaration:	I consider the proposed modification will assist the submitted Core Strategy to be found sound ☐ /unsound X (*place a cross in the box to show which option you have chosen) for the following reasons:
Reasons Given:	See attached letter regarding consultation on proposed modifications following publication of the National Planning Policy Framework.

Signed:	

Name and Address:	Cllr Andrew Steen Chairman Crowborough Town Council Planning Committee Town Hall The Broadway Crowborough TN6 1DA
E-Mail Address:	
If on behalf of a company, please state:	Crowborough Town Council Planning Committee
Date:	6 August 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 X No ☐
I would wish to be notified of the adoption of the Core Strategy	Yes X No ☐

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

Please return this form by **5pm on Thursday 16th August 2012**:

By post to: Head of Planning and Environmental Policy, Wealden District Council, PO Box 49, Hailsham, East Sussex, BN27 2AZ

By email to: ldf@wealden.gov.uk

Data Protection Act 1998 and Freedom of Information Act 2000
Representations cannot be treated in confidence. We are required to make copies of all representations publically 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.

CROWBOROUGH TOWN COUNCIL

Town Hall ▪ The Broadway ▪ Crowborough ▪ East Sussex TN6 1DA
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6th August 2012

M Moore BA(Hons) MRTPI CMILT MCIHT
c/o Lynette Benton
Programme Officer
Wealden District Council
Vicarage Lane
Hailsham
BN27 2AX

Via email: lynette.benton@wealden.gov.uk

Dear Mr Moore,

Wealden District Core Strategy

We write with reference to the current consultation on the impact of the recently published National Planning Policy Framework (the Framework) on the draft Wealden District Core Strategy and your letter dated 5 March 2012 addressed to Mr Philips of Wealden District Council.

In terms of the additional policy that we understand that you requested Wealden District Council include in the Core Strategy, we understand that it is government policy to request that such a policy is included. We have no objections to the inclusion of such a policy or the wording suggested, although it seems to only repeat national policy and, therefore, adds little to the Local Plan.

We do, however, have very significant concerns over the implication of parts of your letter on development in and of Crowborough. We are a small town and it is important to us as the Town Council and the local residents we represent to be able to develop and provide for the town's present needs and into the future. We appreciate the potential for harm to the Ashdown Forest by uncontrolled development, but we believe that the way in which the District Council has interpreted your comments will have significant harm on our town and are contrary to the contents of the Framework.

The Framework provides a presumption in favour of sustainable development that comprises three elements, being:

1. Social;
2. Economic;
3. Environment.

Overall, development should meet the needs of the present without harm to future generations.

The District Council has interpreted your comments to mean that any development that might lead to an increase in traffic will increase harmful nitrogen emissions on the Ashdown Forest. As such, no development will be approved which may lead to increased car journeys, identified as the main source of emissions. District Council Officers confirmed at their Planning Committee that if the recently completed Community Centre were submitted as an application today, it would be refused for this reason. Our concern is that this does not balance the social and economic requirements of our town properly with environmental considerations, which now completely outweigh any other considerations. We are extremely concerned that this will cause very significant harm on the social and economic fabric of our town if this policy continues for any significant period of time.

Furthermore, we understand that the housing allocations proposed by the Council can be completed as these are planned for. We believe that this matter is better dealt with in a more considered manner than a complete embargo on new development other than those sites. For example, if an otherwise sustainable development is proposed in the interim, this could be allowed and an equivalent number of houses to the development approved be taken off the total number of allocations required at a later stage.

The current policy of the Council to refuse all planning applications for new development that might result in an increase in traffic has not been subject to any consultation and we do not believe would be supported by most residents and local businesses, bearing in mind its impact on provision of local community facilities such as the Community Centre as well as the sustainable development of the town as a whole and ability to meet current and future economic and social requirements. Indeed, we understand that District Councillors are extremely concerned about this.

It is not clear why this policy has been introduced so suddenly, given that the evidence base for the Core Strategy was prepared some time ago and most of the legal and policy background has been in place for a number of years. We are concerned at the apparent knee-jerk reaction of the District Council and how your comments appeared to require such a sudden change in how they consider applications for development and policy preparation.

We would like to take this opportunity to clarify that the Town Council is supportive of the quantum of development proposed by the District Council in principle.

Our main concern expressed in previous comments is the potential development of sites that we consider are unsustainable given that there is no suitable access demonstrated to date. We are aware of your comments in this regard, but have seen nothing to indicate traffic impacts can be addressed. We believe that these require further assessment prior to allocation of sites and, in the meantime, the reserve site should remain. That assessment has now been commissioned by us in partnership with the District and County Council.

We were hopeful that you would seek to re-open the hearings to consider this matter, which is of vital importance to Crowborough. However, we note that you have chosen not to do so and wanted to express our disappointment. We suggest that it is of vital importance that local residents and their representatives understand the reasons for your recommendations, bearing in mind the above.

It is appreciated that a number of the above comments might be best addressed by the District Council, but we felt that it was right and correct that you should be made aware of the impacts of your letter dated 5 March on our town.

I trust that the above is clear and request that this be taken into account in your further consideration of Wealden District Core Strategy. If you have any comments or queries, please do not hesitate to contact me.

Yours sincerely

Andrew Steen
Chairman
Crowborough Town Council Planning Committee