THE NEVILL ESTATE COMPANY LIMITED

Matter 11 / The Nevill Estate Company Ltd.

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Representations to the Proposed Submission Core Strategy Document dated February 2011 and the Errata to the February 2011 Proposed Submission Core Strategy dated 24 February 2011

On behalf of the owners of the Eridge Estate, we are pleased to have the opportunity to make representations on the proposed Submission Core Strategy and Errata dated February 2011.

Having read the documents we commend and support its general principles set out therein which provide a well considered update to the existing adopted local plan.

Whilst we are broadly in support of the Core Strategy we should like to make comments under the following main headings:-

Historic Environment

1. We feel that he wording of SP02 should be amended to replace the words 'the historic environment is protected' with 'the historic environment is conserved'.

Housing

1. The development of residential infill at Jarvis Brook (SD9) to commence around 2015, to include both open market and affordable housing.

2. Modest sized open market and affordable housing to include key worker accommodation in villages such as Frant and Eridge Green.

3. We would like to propose that the brown field site at Hargate Forest, site of a WWII underground bunker, be allocated for housing as a readily available alternative to the 'urban extension' adjacent to Tunbridge Wells referred to in WCS6.

Business

1. Opportunities for rural employment through economic development to include tourism and leisure.

2. Farm diversification supporting the redevelopment of redundant farm buildings.

3. The provision of modern business premises particularly freehold B1 & B8 and food processors who suit redeveloped farm buildings.

4. Support towards modest increases to existing business areas particularly Crowborough and where farm diversification has taken place.

5. Support towards the provision of flexible accommodation for small and medium enterprises, encouraging start up businesses.

6. Addressing the problem of current broadband provision in rural areas.

Tourism

1. Provision of camp sites with good quality amenities to encourage visitors on a budget to visit the area.

2. Encourage the opportunities for tourism that will follow the reopening of the railway line between Tunbridge Wells West Station and Eridge Station and show this on Fig 3 "Location of Business, Retail and Tourism within Wealden District".

Renewable Energy

1. The use of renewable energy particularly heat produced from woodchip, the raw material for which is readily available from sustainably managed woodlands (currently under or un-managed) with resultant benefit to woodland biodiversity together with the establishment of suitable sites to process and store the fuel.

11 April 2011

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Wealden Proposed Submission Core Strategy

Consultation Response Relating to Land at Jarvis Brook, Crowborough.

1.0 The Number of Dwellings Proposed to be Delivered.

(paras 3.8-3.17 , Policy WCS1)

1.1 The Council states that the Core Strategy intends that a total of around 9,600 dwellings will be created in the period 2006 to 2030. This is made up as follows:

Houses already built (to April 2010)	1331
Existing commitments	3558
Proposed Additional Housing	4685
TOTAL	9579

1.2 Paragraph 3.10 of the Proposed Submission Core Strategy states that the Council expects the population of the district to increase between 2006 and 2030 by approximately 19,000, which represents 16,800 households. It is clear therefore that the number of new households likely to be needed in the district over the plan period will be far in excess of the number of new dwellings planned. Even if all of the new dwellings proposed are delivered this will only meet the needs of 57% of the expected new households. Well over 7,000 households will remain in housing need.

1.3 On this basis the Core Strategy is unsound because the numbers of dwellings proposed to be delivered does not properly reflect the expected housing need. A larger number of dwellings should therefore be planned for in PolicyWCS1 to redress the shortfall in District-wide housing allocations.

2.0 The Delivery of Housing.

(paras 5.13-5.16 and Figure 4)

2.1 Paragraph 5.13 states that over the last 21 years on average 400 dwellings have been built per annum across the district, and the Council hopes that this level of delivery can be sustained throughout the plan period. It is considered that there must be significant doubt as to whether this level of delivery is reasonable and achievable.

2.2 The Council's Annual Monitoring Report 2009/2010 identifies the annual net increase in dwellings in the district in recent years as follows:

Year	Additional Dwellings
2004/2005	128
2005/2006	173
2006/2007	230

2007/2008	415
2008/2009	349
2009/2010	337

The average number of new dwellings delivered over this 6 year period is 272, which is a very long way short of the 400 average that the Council is hoping for. Furthermore, the first four years of this period cover a time of relative boom in the housing development market, yet the average net increase in dwellings was only 236.

2.3 While there may be reasons why higher numbers of houses were delivered in the past, there is no indication in the above evidence that this is likely to be repeated to enable the identified annual average yield to be achieved.

2.4 To ensure that sufficient provision is made for housing to be delivered throughout the Core Strategy timescale, the Council needs to increase its overall level of housing numbers and, importantly, to increase the level of provision in the northern part of the District. It is considered that there should be increased provision for both Crowborough and Heathfield which is set out in more detail in the following sections. Higher provision at these locations can be accommodated in accordance with Policy SPO3. Furthermore this approach will strengthen the ability of the Council to meet the objectives in Policy SPO4. As drafted, the Core Strategy will fail to protect or secure investment to enhance local and community provision in these towns. Higher levels of housing will provide the opportunity to secure greater levels of investment (including that from developer contributions) particularly where larger sites are allocated and developed in a more comprehensive way.

3.0 <u>The Location of New Housing Allocations.</u>

(Policy WCS2)

3.1 The majority of new housing is proposed to be provided in the southern part of the district. The highest number of additional dwellings (1300) is proposed for Hailsham, which is in addition to the 1645 dwellings already built or committed. Thus Hailsham is intended to receive 2945 dwellings over the 24 years of the plan period. This represents 123 dwellings per year.

3.2 What these figures fail to take into account is the ability of the local housing market in any given part of the District to generate sales of new dwellings. There is a limit to the number of dwellings that can be sold in Hailsham in any given year, which is related to the strength and vitality of the local housing market. Developers will not build more houses than they are reasonably sure they can sell. The Wealden Housing Market Assessment published in 2007 sets out the "Drivers in the Development Industry" (paragraph 1.69) as follows:

- *The type and size of dwelling they (a developer) have succeeded in selling in either the local area or in other similar locations (and therefore for which there is a known market).*

- *The scale of demand or pressure on particular dwellings in the existing stock – through discussion with local agents.*
- *Related to the above, the return on capital invested i.e. the mix of dwellings that will provide a quick sale once completed.*
- *The value of the land once contributions for affordable housing and other obligations have been factored in.*

3.3 It is considered that these factors have not been properly taken into account. The market in Hailsham is not strong enough to ensure that at least 123 dwellings per year over a 24-year period can be delivered. Just because the settlement has been identified as being suitable for this much housing, and is even in need of it, does not mean that it will be provided. The delivery of the housing is wholly dependent on the development industry being able to sell it and it is not considered that any evidence from house builders or agents has been obtained to support the Council's view that this amount of housing can be delivered in Hailsham in the plan period.

3.4 It is also considered that the same issues apply to the proposed allocations in Polegate / Willingdon and Stone Cross / Westham. These are all close together in a relatively small part of the south of the district, and together they account for 4,902 of the dwellings proposed in the Strategy (51%). The Council's strategy for this part of the District will also result in the loss of the individual identity of these Wealden settlements as they will effectively become an urban extension of north Eastbourne.

3.5 The part of the District where the market is known to be strongest is in the north, a fact that is recognised at paragraph 2.17 of the Core Strategy which states that "*Wealden's good quality of life, and its proximity to London and the Gatwick growth area, creates a high demand for housing, especially in the north of the District. Demand has in the past exerted considerable upward pressure on house prices, and has caused a widening gulf between local incomes and market prices, and led to severe shortages of affordable housing*". This is the area where the Council can be far more confident that the amount of new housing needed can be delivered. The total number of proposed units in Crowborough, edge of Tunbridge Wells and Heathfield is only 1,557, which is only 16% of the total. Even if half of the number to be provided in the rural villages is added, this only brings the number to 2,243 (23%). Uckfield is not in the northern part of the District where the market is strongest.

3.6 The Proposed Submission Core Strategy is unsound because the majority of housing has been allocated to settlements in the south of the District where the market is not strong enough to deliver them, and not enough housing has been directed to the northern part of the district where they can be delivered. Notwithstanding the constraints of the AONB and the Ashdown Forest Special Protection area there is scope to provide more land for housing at Crowborough and Heathfield, and in the interests of actually seeking to achieve more housing in the District these should be actively pursued in the Core Strategy. One of the particular recommendations of the Wealden Housing Market Assessment is the encouragement of more smaller dwellings

in the northern part of the district (para 9) in this could be an integral part of achieving more dwellings in the part of the District where there is a more viable housing market.

4.0 Crowborough Area Strategy

(para. 6.33 – 6.38, Policy WCS2, Figure 9)

4.1 The Core Strategy is considered to be unsound on the basis that insufficient new homes are allocated for the town. This is demonstrated by reference to paragraph 6.33 which identifies a current need for 305 new affordable homes. The Core Strategy identifies only 300 new homes in total for Crowborough over its 24-year duration, which is less than the current level of need for affordable homes on their own. This would appear to be a fundamental flaw in the strategy and demonstrable proof that the Core Strategy under-provides new housing allocations for Crowborough. On the basis that new development will need to provide 35% affordable homes, Crowborough will need to have allocated a minimum of 872 new homes to deliver the level of affordable housing that is presently required. Clearly for future affordable provision to be yielded, the allocated figure would need to be significantly higher.

4.2 It is considered that the Core Strategy is unsound in that it cannot meet the future housing needs for market homes and affordable homes through the allocations proposed in Policy WCS2. To make the Core Strategy sound, it is considered that the housing allocation should be increased to a figure in the order of 900 new homes.

4.3 The description of Crowborough set out in paragraph 6.33 includes a number of comments that are either incorrect, or of questionable relevance. It is suggested that the number of people living in the town that also work in the town is low, however there is no indication as to what the Council think it should be. There can be no doubt that compared to Stone Cross and Westham, Willingdon, and Polegate the proportion is much higher, and yet the strategy aims to locate far more housing in these settlements than Crowborough. There is no justification for this inconsistent approach.

4.2 The Council mentions that the railway station is some distance from the town centre. The residents of Crowborough do not all live in the town centre, and a very large proportion of them live within easy walking distance of the railway station. The service is very well used. Hailsham, where the largest housing allocations are proposed, does not have a railway service at all, as well as relatively limited bus links. The location of Crowborough's railway station is no justification for suggesting that the town is less suited to new development.

4.3 The Council refers to out-commuting to Tunbridge Wells, East Grinstead and Uckfield, however there is no mention of the number of Crowborough residents that commute into London. It is not accepted that a significant number of Crowborough residents commute to East Grinstead or Uckfield, however it is known that a very large number commute to London, using the

train service. This is a sustainable form of living and working which the Council has made no reference to.

4.4 The Council states that "the employment centres in the town attract vehicles along unsuitable restricted residential roads". This is a wholly misleading over-generalisation. Not all existing employment sites are as inaccessible as suggested.

4.5 The need for more employment in the town, and the significant housing need that exists are clear and should be given significant weight. What should be taken into account is the stronger housing market in the town compared to much of the rest of the district. The fact that it is close to Tunbridge Wells makes it a desirable place to live, as does the good train service into London, and the attractive landscape around the town. This means that it can deliver housing at a higher and more consistent rate than many other parts of the District.

4.6 Figure 9 identifies land for an urban extension to the south east of the town, and for residential development at Jarvis Brook. None of this land is within the AONB, it is well away from the exclusion zone around the Ashdown Forest Special Protection Area, and is close to the railway station and existing employment areas. In view of all of these factors, and the ability of Crowborough to deliver more houses within the plan period than many of the other settlements it is considered that there is no justification in restricting the number of new dwellings allocated for the town to just 300. The town could easily deliver 90 additional dwellings per year over the remainder of the plan period and the number allocated should be at least 900.