Wealden Core Strategy Examination – Matter 8 Statement

Folkington Estate

Polegate, Willingdon and Stone Cross Area Strategy

Whether the Strategy for the Polegate, Willingdon and Stone Cross Area, including the Strategic Development Areas, is soundly based and deliverable

Policies in Core Strategy: WCS2, WCS3, WCS4 (SD4)

(a) Have reasonable alternatives to the Strategy been considered?

The Strategy for the Polegate area distributes housing between SE of Polegate and two locations at Stone Cross. The draft Core Strategy presented to Councillors in November 2010 showed two potential locations for housing at Polegate – Southeast and North. These two alternatives have not been compared in detail, nor has the alternative of dividing the strategic development area SD4 locating some development to SE of Polegate and some to the North been evaluated.

The location of housing outside the boundary effectively created by the east-west A27 trunk road (CS Fig 8 p46) would not be sustainable development. Locations to the west or north of Polegate outside the A27 are advocated by a developer (SHLAA sites 255/1510, 256/1510 and 257/1510).

These are not reasonable alternatives for new housing development because they conflict with a range of local, regional and national policies. They would create separate isolated residential areas without effective linkage to the existing urban area, dependent on car access, and intruding into open countryside. They would not be sustainable urban extensions.

(b) Is there a clear audit trail showing how and why the preferred strategy was arrived at?

The audit trail is not clear. The SHLAA (2010) examined a range of potential housing sites submitted by interested parties, and which were 'suitable' and which were 'unsuitable'. The justification in the SHLAA for finding sites 'unsuitable' is generally clear, if brief (the SHLAA entries are not long for any site).

In view of the planning history of attempts to promote a greenfield housing site W of Polegate, the Folkington Estate considers that some elaboration of the wholly justifiable rejection of the location west of Polegate in the SHLAA and in the CS is needed beyond CS para 6.27. (PW1 in the 2005 Non-statutory Plan, Honey Farm in the 2011 Appeal). This is addressed in answer to Question (k) below.

The principle of some development at Stone Cross is explained, but not the scale of this development (650 dwellings, SD6, SD7). The principle of locating all the proposed housing for Polegate to the SE of the town (SD4) is also not justified by the audit trail. The location between

the A27 Northern Bypass of Polegate and the urban area was also found to be a 'suitable' location in the SHLAA (Sites 150/1510, 193/1510, 241/1510, 457/1510) and is the preferred location for housing in Polegate Town Council's Masterplan (*Summary of Masterplanning Documents*, P16, para 6.10). The justification for choosing the SE of Polegate location as the sole Strategic Development Area over the North of Polegate location is not made at CS para 6.30; this states only that 'The Sustainability Appraisal of broad locations favoured land south of Polegate and east of Willingdon'. There is no analysis of the following options which would be sustainable and would meet the principles of the strategy:

- Dividing strategic location of housing at Polegate between the two broad locations, SE and N of Polegate
- Reducing the housing located north of Stone Cross (SD7) and locating some of that housing on at the 'suitable' North of Polegate
- Including the North of Polegate location and spreading development between SE of Polegate, N of Polegate and one of the Stone Cross locations.

An analysis of the Sustainability Appraisal was submitted by RH & RW Clutton for the Folkington Estate as part of Regulation 27 Representation in April 2011. This is found attached to the comments 1104, 1105 and 1106.

(c) Have the infrastructure implications of the strategy clearly been identified and supported by the evidence base? Is it clear who is going to deliver the required infrastructure and by when?

The Infrastructure Delivery Plan lists improvements of four junctions on the A22/A27 routes (p37-38 of IDP). These works have been listed for some time but none have been committed. The Highways Agency response to the Wealden Core Strategy (letters April and Sept 2011) states that any such improvements would need to be funded by developments. It is thus clear that the HA will not fund any infrastructure on the A27 trunk road; it will only carry it out at cost to others.

The limitation on car parking at Polegate Station and the road congestion around the station at peak hours, is not addressed in the IDP. This limit on use of rail and on accessibility to public transport has been identified for some time in local responses to the LDF. There is in the CS and IDP no requirement on developers or other party to fund this.

There is no proposal in the CS or the IDP for a new railway station at Stone Cross / Langley to serve the proposed 700 more houses at Stone Cross. This station has been proposed in the past and ould be desirable. It would enable new and existing development at Stone Cross to access public transport as a viable alternative to use of the private car. (The site discussed would be on the boundary with Eastbourne BC.)

(d) Has the impact of the strategy on the Strategic Road Network been adequately assessed and is there a reasonable prospect that the transport infrastructure required is deliverable?

The housing proposals for SE of Polegate (SD4) would add traffic to the A27 at the A2270/A27 junction and increase congestion on the A2270 into Eastbourne. The SWETS study showed that while traffic generated by this development could be accommodated, a location on the north and

northeast side of Polegate would be likely to have less impact on the A27 and A2270. That is partly because housing north and northeast of Polegate primarily add traffic to the A22 New Route southwards to Eastbourne, which has spare capacity, rather than onto the A27, and not onto the A2270 into Eastbourne. By contrast development at location SD4, SE of Polegate, could not access the A22 New Route and all traffic generated by it would use the A2270.

The alternative advocated by developers of housing west of Polegate would add traffic to Cophall roundabout and to the A27 west to Lewes, along the boundary of the South Downs National Park where policies prevent significant road widening and junction upgrading which would harm the purpose of the National Park. It would have the worst effect on the A27 trunk road.

The IDP lists at Table 4, p37-38 'critical and key infrastructure' for the Polegate, Willingdon and Stone Cross area, and states that development proposed is contingent on delivery of the infrastructure identified in SWETS. They are further described at p55-56 where they are stated under 'risk and contingency measures' to be 'essential to ensure the delivery of development in south Wealden'. [See response to Question (c) above regarding deliverability.]

The IDP lists at Appendix A, it should be noted, are of all possible schemes rather than those that are 'critical and key'.

On p55 a scheme titled '*Folkington Link / Cophall Roundabout Junction Improvements (or equivalent*' is listed as being a Highways Agency responsibility and funding to be 'potentially DfT funding'. This is not a proposal in the Core Strategy and the strategy for Polegate area does not require it. The entry for this scheme states that growth could be accommodated without it and that it is not critical to growth in south Wealden.

It should be emphasised that the Highways Agency has no plans to pursue a Folkington Link. There is no funding and it is in no trunk road programme. There is no route alignment and no feasibility study has been commenced. The scheme would have severe landscape and heritage impacts because it would affect the setting of the National Park, would require land within it, and would pass through a Registered Park & Garden (Wootton Manor). Promotion of such a scheme would require:

- A Department for Transport funding commitment
- Extensive consultation on a range of options, including improvement to the existing road or its junctions, as well as a range of new alignments
- An application to the Infrastructure Planning Commission
- IPC investigation and hearings
- Decision by the Secretaries of State for Transport and for Communities & Local Government, and construction by the Highways Agency

The prospect of such a scheme being promoted or implemented during the period covered by the Core Strategy is low. The inclusion of this scheme in Appendix A as a possible project is unsound and the entry should be deleted. The alternative to the Folkington Link, indicated at p55, of signalising Cophall roundabout is included in any case as the next entry in Appendix A on the same page, so can be retained.

(e) Is the strategy sufficiently flexible to respond to an unexpected change of circumstances?

There is flexibility to change the order in which the Strategic Development Areas are brought forward. is not sufficient. This flexibility is however limited, and would be improved by amending the CS to provide for two smaller Strategic Development Areas at Polegate rather than one large location – the Hindslands part of the site SE of Polegate (ie part of SD4), and a location N of Polegate (SHLAA suitable sites 150/1510, 193/1510, 241/1510 and 457/1510). Both the SE and the Northern sites would be sustainable locations within the perimeter set by the A27 east-west trunk road and would have access to town centre and railway station by foot. If one site proved difficult to develop or could not start, with two locations there would be the flexibility of bringing forward the other.

There would also be scope to bring forward land north of if one of the Stone Cross locations did not commence at the time stated in the Core Strategy.

(f) Is SD4 justified and deliverable ?

The SE of Polegate location SD4 is a single large site which extends too far to the E and removes too much of the gap between Polegate and Willingdon. If reduced to the Hindslands section (about half the proposed strategic development area) (300-400 dwellings) it would be more justified and more deliverable.

Mornings Mill Farm is the remaining agricultural land farmed between Polegate and Willingdon. It is visible from the South Downs (Coombe Hill). Development of this location needs to be compared with locating new housing to the north of the built-up area and south of the A27 Bypass.

(g) Is SD5 justified and deliverable ?

There appear to be no problems with this employment proposal.

(h) Is SD6 justified and deliverable ?
(i) Is SD7 justified and deliverable ?

The scale of development at Stone Cross is significant and without a new railway station the proposed level of development at SD6 and SD7 would seem too dependent on access by car. Development at the broad location north of Polegate, south of the A27 bypass (SHLAA sites 150/1510, 193/1510, 241/1510 and 457/1510) would enable the Stone Cross locations SD6 and SD7 to be limited to 300 dwellings.

(j) Is there appropriate justification for the phasing of housing at SD4 from 2019?

It is not clear why the part of this development which is adjacent to the existing urban area of Polegate – on the Brighton University and ESCC owned land at Hindslands rather on than the larger area of Mornings Mill Farm - could not commence some years earlier. A smaller site would have less effect on traffic levels on the A2270 and its centre would be closer to Polegate's retail area and station than the submitted SD4 proposal

(k) Have reasonable alternatives to SD4, SD5, SD6 and SD7 been considered – omission sites?

Location of some housing for Polegate to the north of the town and south of the A27 Bypass, as proposed in the Polegate Town Masterplan (para 6.10), as a sustainable urban extension, has not been considered sufficiently. The CS states at para 6.30 only that which it was identified as a suitable location, 'The Sustainability Appraisal of broad locations favoured land south of Polegate and east of Willingdon'.Further consideration should be given to including this land, or part of it, in the Strategic Development Areas; see the response to Question 8(b) above.

The alternative of locating housing W of Polegate on the 'Honey Farm' location (SHLAA site 255/1510) has been considered and rejected by the Council. An Appeal against refusal of a planning application for this location was refused by the Secretary of State in May 2011.

A comparison of this site with the North of Polegate and SE of Polegate locations was undertaken by the Council's witness for the Appeal. The Sustainability Appraisal at pp 231-233 sets out the comparison between the North of Polegate and SE of Polegate locations; this was extended to include the Appeal Site. The Appendix to this Statement reproduces this comparison (Appendix RW9 to Proof of Evidence of R W Walker). It shows that the Appeal site ranked considerably lower than either the Core Strategy's location (SD4) or the alternative North of Polegate location.

There are strong reasons for rejecting the West of Polegate (Honey Farm) location as an omission site.

(1) Land west of the A27 trunk road around Polegate would be an unsustainable location and would fail to meet the principles required to act as a sustainable urban extension. It would be isolated from the existing town by the trunk road and linkages to the town would be weak or non-existent. There is no proposal for a 'Folkington Link' which would re-route the trunk road away from its present course during the period of the Core Strategy. It would remain in its present position. (See answer to Question 8(d) above.)

(2) Access by car (or bus if any service ran) would be through Cophall roundabout, and by no other means. All journeys by car and all servicing of such a site would require negotiation of a large gyratory which is at times congested, and uncomfortable to use, and has caused more accidents than predicted since it was brought into use in 2002.

(3) There would not be suitable pedestrian or cycle routes between housing west of the A27 and the town. It would not be possible to build these without harm to living conditions for existing residential properties east of the trunk road.

(4) Housing at this location would require to be fenced securely to avoid any pedestrian crossing of the trunk road by residents, and secure fencing would also be required to avoid crossing of the railway to reach the trunk road to the south. This would make any such development a 'gated community', separated psychologically from the town of Polegate.

(5) Traffic noise would affect the housing to both east and south, whereas the existing housing to the south of the A27 trunk road and to the east of A27 where it turns north receives traffic noise from one direction only.

(6) A plant hire depot and service centre for buses at 'Honey Farm', an established use with unrestricted hours of operation, which has access direct from the A27, would remain, incongruent with residential land use.

(7) The countryside which extends west from the A27 along the foot of the escarpment of the South Downs has significance as 'ancient countryside', of an importance that justifies the protection of the land west of Polegate from urban development. It centres on the historic house Wootton Manor (Grade II*) and its Registered Park and Garden (Grade II), but the significance of the historic landscape is deeper and stronger than the listing of the house and registration of the park & garden by themselves indicate. The Appendix to this Statement, 'The Historic Landscape around Wootton Manor', details this significance and the weight to be attached to it. This demonstrates that any urban development west of Polegate, and any road scheme of the type envisaged as future infrastructure (in the Infrastructure Development Programme attached to the Core Strategy), would be very harmful to the historic landscape as a whole, and conflict with Policies for its protection.

(8) The site advocated by the developer would harm the views from within the South Downs National Park, by extending the built-up area of Polegate westwards beyond the established limit set by the tree-lines north-south length of the A27. Even if this loss of countryside was considered small in terms of the overall panoramic view from the Downs, it would develop the first area of open Low Weald countryside that faces the Downs and which is undeveloped from Polegate to Lewes. It would be an intrusive urban sprawl, with no firm outer limit, harmful to the setting of the Downs. South East Plan policy C2/C3 refer; planning decisions should have regard to the setting of the South Downs, where development lies outside the boundary of the AONB (now National Park).

In the Appendix to this statement is a summary of the findings regarding the west of Polegate location which is taken from the *Landscape Character Assessment and Development Option Evaluation Study*, published in 2009 as part of the evidence base for the Wealden LDF by the Landscape Group of East Sussex County Council. This found that the site is harmonious, well-kept farmland and that conservation was the appropriate mitigation strategy.

For all these reasons any proposal that the CS be changed to include any development of housing or a new road west of Polegate should be rejected.

The Folkington Estate
December 2011