Wealden Core Strategy Examination – Matter 8 Statement

Statement by Long Man Parish Council

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)

Long Man Parish covers three settlements immediately west of Polegate along the A27 – Folkington, Wilmington and Milton Street (three electoral wards). This is an important area which needs to be kept free of development, both within and immediately north of the National Park boundary. While the current Core Strategy shows a Strategic Development Area (SD4) southeast of Polegate, developer interests (Pelham Holdings) continue to advocate development west of Polegate extending into our area.

We represent the residents of the rural villages immediately west of Polegate. Most of our Parish is within the South Downs National Park, the boundary of which is the A27.

In the 2005 Wealden Non-Statutory Local Plan, land west of Polegate was proposed for development (Location PW1). While Wealden District Council has now withdrawn its support for that location and specifically excludes it from the SHLAA and the Core Strategy, its previous appearance in a plan remains of serious concern to us. We would stress that this proposed site was put into the Non-statutory Plan by a decision of Members against officer advice, and was not subject to public participation or a Local Plan Inquiry. We were in fact informed that the opportunity to advocate other locations for the housing than the PW1 site would come at the LDF.

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

We support the current proposal for housing to be located SE of Polegate at Hindslands and Mornings Mill.

Siting housing outside the A27 Trunk Road, which forms a western and northern boundary to urban development at present, would not be a reasonable alternative; such locations would be large-scale greenfield development, in full view from the top of the Downs, and would be unsustainable. See Fig 8 of the Core Strategy (p46); this shows how the A27 is an effective way to contain development and prevent sprawl.

Development west or north of the route of the A27 would not be ‘sustainable urban extensions’ as planning policy requires. It would be without effective linkage to the existing urban area, dependent on car access, and intruding into open countryside.

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

We believe that the Wealden District Council SHLAA (March 2010) shows how sites were assessed and why some were found ‘suitable’ and others ‘unsuitable’. The justification in the SHLAA for finding the site west of A27 (‘Honey Farm’ or Pelham Homes site in local parlance) ‘unsuitable’ is generally clear. SHLAA entries are not long for any site.

(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 (IDP) lists improvements of four junctions on the A22/A27 routes (p37-38 of IDP) – A22/Dottons Road, A22/A27 Bypass/Pevensey Bypass; Cophall roundabout; and the A27/A2270 Lewes Road signals (known locally as 'The Dome' because of the Salt Dome at the East Sussex CC maintenance depot adjacent).

These works have been listed for some time but none have been committed. The Highways Agency's letters to Wealden in response to the consultation in 2011 say that any such improvements would need to be funded by developments, so the HA will not fund any infrastructure on the A27 trunk road; it will only carry it out at cost to others.

(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 le traffic generated by this development could be accommodated, but Long Man PC is concerned that new housing at Polegate would add to traffic on A27 through the Parish.

The housing site advocated by Pelham Homes, west of Polegate, would add even more traffic to Cophall roundabout and to the A27 west to Lewes, as it would be such a car-dependent site with little or no public transport and no safe pedestrian or cycle access (Bridges over A27 were found unacceptable as a means of foot access, by the recent Inquiry.)

The A27 forms the boundary of the South Downs National Park. Here planning policies prevent significant road widening and junction upgrading which would harm the purpose of the National Park.

The four junctions listed at (c) above may be able to be upgraded.

Long Man PC is concerned at the inclusion in the IDP at Appendix A of a scheme titled '*Folkington Link / Cophall Roundabout Junction Improvements (or equivalent)*'. We strongly oppose this scheme, past versions of which have been formally withdrawn. It would bring a new road into our Parish and considerably increase pressure on the A27 at the junctions at Wilmington and Milton Street.

Our understanding is 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

The inclusion of this scheme in Appendix A should be deleted. An alternative to the Folkington Link, indicated at p55, of signalising Cophall roundabout is included in any case as the next entry in Appendix A.

(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. The Hindslands / Mornings Mill location (SD4) could be started earlier than 2019.

(f) Is SD4 justified and deliverable ?

The South-East of Polegate location SD4 Hindslands / Mornings Mill location is accepted by Long Man PC as the most suitable location for housing.

(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 ?

Long Man PC has no comment on these locations to the east of Polegate.

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

We would imagine that the area next to the existing urban area of Polegate – the Brighton University land at Hindslands - could be developed earlier than 2019.

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

We would like to stress that 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. There are strong reasons for rejecting it as an alternative or 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' in the Plan Period.

(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 even dangerous.

(3) There would not be suitable pedestrian or cycle routes between the 'Honey Farm' site advocated by Pelham Homes, 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; this would require intrusive bridges which would themselves be unsafe and unattractive for many users, forcing the greater use of cars.

(4) Housing at this location would have to be fenced securely to avoid any pedestrian crossing of the trunk road by residents, and secure fencing would also be required to avoid the 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.

(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 setting of the historic house Wootton Manor (Grade II*) and its Registered Park and Garden (Grade II), the most important historic landscape in the Low Weald part of Long Man Parish, would be severely damaged.

(8) The setting of the South Downs National Park would be damaged by the extension of the built-up area of Polegate westwards. At present it stops firmly at the trunk road (the tree-lined north-south length of the A27). Even if this loss of open countryside is 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 currently undeveloped from Polegate to Lewes. It would be urban sprawl, with no outer limit, harmful to the setting of the Downs.

Long Man Parish Council would be opposed to any revival of the PW1 location for housing west of Polegate. We consider the Core Strategy sound in proposing the current location SE of Polegate (Strategic Development Area SD4). We believe that the reference to a possible Folkington Link as future infrastructure should be deleted from the Infrastructure Delivery Plan as unsound.

Long Man Parish Council 15 December 2011