MATTER 9/A DEKLANDS LTD

WEALDEN DISTRICT CORE STRATEGY

EXAMINATION

FURTHER EVIDENCE RELATING TO MATTERS ISSUES AND QUESTIONS

Consultee ID: 344781
Agent ID: 102571

MATTER 9/A DEKLANDS LTD

a) Have reasonable alternatives to the strategy been considered?

A reasonable alternative to the strategy is clearly the provision of SEP housing land targets and how that should be articulated for each of the Local Spatial areas such as Crowborough. In the case of Crowborough, provision of the SEP housing targets can be partly attained by elevating the contingency urban extension north of the A26 to a full allocation. This area has already been assessed in the Council's landscape assessment as being suitable and in fact is said by the Council to be better than sites to the south which lie outwith the AONB. I have reviewed these points in my submissions on Matter 3/E. I also include as Appendix 3 a bespoke landscape assessment of this area to demonstrate its suitability. Consideration should be given to the northeast area of Crowborough for around 130 dwellings.

MATTER 9/B DEKLANDS LTD

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

It is not clear why the decision to reserve the site north of A26 as a contingency site has been taken – there is no paper trail explaining this. It has been identified as being suitable for development in spite of its AONB designation. In fact the site is considered less harmful in landscape impact terms than sites to the south (see landscape assessment). It is also acknowledged as having good transport links. Page 79 onwards of the Sustainability Appraisal (SA) outlines the way in which the growth areas around Crowborough have been considered. The northern location is considered better located to the Town Centre and sports facilities (more so than southern locations), would meet social objectives, there are no significant environmental issues. There is confirmation on page 81 of the SA that none of the locations adversely affect the landscape. Having reviewed all the locations assessed, it is clear that the location north of A26 has not attracted any reasons which would justify it being a contingency reserve only despite the comments at paragraph 6.36 of the SCS. It is equal to if not better than the other growth areas assessed and it is only on the re-use of PDL that it falls down. That said, this is a criticism of all the growth areas around Crowborough. Consequently, I see no paper trail that justifies this site as being a contingency only. Its elevation to full allocation on a par with the other growth areas around Crowborough would be appropriate and would move the SCS towards providing SEP housing targets. The paper trail to do this already exists. (NB: comments I make at matter 3/A explain why there are sound planning reasons to allow this increase in housing despite proximity to Ashdown Forest).

MATTER 9/C DEKLANDS LTD

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 when?

The supporting evidence has not explained what improvements to traffic infrastructure are required in order to deliver the proposed housing towards the south of Crowborough. There is no explanation in the Core Strategy as to how the sites will be delivered, whether contributions will be required and whether funding will be available from other sources. As a minimum there should be a policy acknowledgement that there is land available to meet the necessary improvements to the highway and confirmation that the 160 dwellings for this area is able to fund, on its own, such highway infrastructure needs. I note that the Crowborough Area Strategy does not set out what infrastructure constraints exists and how they can be dealt with to deliver the strategy.

MATTER 9/D DEKLANDS LTD

d) Is the strategy sufficiently flexible to respond to an unexpected change in circumstance?

The Crowborough Area Strategy sets specific delivery dates for SD10 and SD9. The strategy also sets out specific capacities for housing delivery, with 300 new homes being the target. Setting aside my evidence that more housing should be targeted towards this area in any event, I find that the definitive delivery dates do not support the concept of a flexible plan. If sites can be delivered earlier then they should be. The policies should not prevent early delivery from happening. In some respects early delivery is the objective of NPPF where it seeks 20% of the housing land supply to be front loaded.

I could foresee a situation where water treatment infrastructure is provided earlier than expected or that highway proposals come forward which bring forward delivery. If this happens then sites should not have to wait. I also find it negative that the plan seeks to delay commencement of its largest site until around 2024. This is only 6 years before the end of the Plan period. Utility infrastructure improvements will be completed by 2018 and perhaps earlier.

I also find that the 400 m exclusion zone (paragraph 6.38, No 11) for new development around Ashdown Forest as inflexible where it overlaps Crowborough. Such a zone is a straightline distance and does not consider the real distance that the additional population created by new development would need to drive or walk to access the Forest. Once private land is excluded it may be that the travel distances are too great for pedestrians and drivers. This would then reduce likely additional population pressure. The policy must provide the opportunity for such a case to be demonstrated. Alternatively, the cumulative effect of a small net gain on a PDL site within the 400m may have negligible impacts on the Forest. Again the flexibility must be there for an applicant to test this. If small redevelopment schemes within the built up area and within the 400m zone come forward and are able to

financially contribute toward SANG's then there should be the ability for the applicant to put this case forward and justify their scheme.

MATTER 9/E DEKLANDS LTD

e) Is SD8 justified and deliverable?

This is the site containing the Council's current offices. It is a relatively modern office building and importantly it provides the only large office accommodation in the Town Centre. For the continued vitality and viability of the Town Centre a large business premises should be maintained at this location. It is not justifiable to allow the loss of this employment floorspace as a result. The main concern is that the strategy seeks to emphasise the role of the Pine Grove site for housing as opposed to its retention for employment uses. This is considered contrary to PPS4, PPG13 and results in an ineffective strategy. The solution is to identify more housing on the periphery of the town and reinforce the Pine Grove site as being suitable for predominantly employment type uses.

The Pine Grove site referred to in this paragraph is considered an important employment area in a highly sustainable location. The reference in the paragraph to 'no decision being taken on the future use of this site' means that the strategy is ineffective – it is surely the purpose of the Core Strategy to help direct development to suitable locations. This aside, identifying the site under paragraph 6.36 for high density housing would not be the most effective/appropriate strategy and would be contrary to PPS4, PPG13 and employment protection policies. Whilst some housing may be appropriate, the site should principally be retained for employment type uses. Its retention for mainly employment purposes would help maintain a balanced town centre economy. Its loss to housing would mean that the vitality of the town centre is wholly dependent on retail. This would not maintain a sustainable town centre. A more appropriate and effective strategy will be to identify Pine Grove for mainly employment uses and to reinforce housing to the south and south east of the town.

Recommended Change

6.35 The Council currently locates one of its offices at a central strategically located site at Pine Grove, shared with the County Library Service. A decision has been made to transfer staff to its Hailsham campus. This is likely to take place within the first five years of the plan. The Pine Grove site should principally be used for employment type uses in the B1 category with only a small proportion for residential uses. Such a strategy would ensure that the centre maintains vitality and viability but also would be compliant with National Policies. No other suitable employment land has been identified within the Crowborough area and so its use for principally employment type uses is very important.

6.36 The SHLAA revealed a range of potential housing sites around the town but many of these are within the AONB, or are at locations which did not perform well at Sustainability Appraisal. That said, the Council has identified

an area to the south and east of the town suitable for Greenfield housing development. In addition, areas south of Western Road along Tubwell Lane which, although in the AONB are characterized by existing housing development, should be considered as part of the urban extension area identified under SD10.

Amend Key diagram on page 49 to annotate the contingency site as a allocation.

Amend pink annotation of SD10 to also include areas around Tubwell Lane.

Amend paragraph 6.38 to reduce the anticipated housing in the town centre.

MATTER 9/E DEKLANDS LTD

f) Is the loss of some employment land at SD8 without specific provision for employment uses elsewhere in the Crowborough area soundly based?

Paragraph 6.33 of the SCS accepts that there are pockets of unemployment in Crowborough. In addition, any new housing needs to be balanced with an appropriate level of employment provision. A strategy which seeks to reduce employment provision in one of the most accessible locations (the Town Centre) is not a sound strategy either in relation to the existing local economy or in planning for new growth generally.

g) Is SD9 justified and deliverable?

No further comments

MATTER 9/H DEKLANDS LTD

h) Is SD10 justified and deliverable?

PPS3 explains that to be deliverable sites must be suitable, achievable and available. Whilst it is probably the case that the suitability and availability criteria are met, achievability is not proven. Appendix 2 includes a highway statement of the road network in the vicinity of this SD10 area and it is considered that in the absence of any evidence from the local authority that this area can be adequately served by road infrastructure or that there is secure funding for that infrastructure, the achievability of this housing area cannot be sufficiently guaranteed to warrant inclusion in the Core Strategy.

MATTER 9/I DEKLANDS LTD

i) Is there appropriate justification for the phasing of housing at SD10 from 2024?

Setting aside my query regarding the delivery of the site, a delay in housing delivery to 2024 is significant and not warranted given the limited amount of brownfield land that is identified in the Annual Monitoring Report and SHLAA. It does not allow sufficient time, if the site fails to come forward, for

alternatives to be considered. In my review of the environmental and infrastructure evidence I find no core reason why planning for growth could not begin sooner. Such an approach would encourage infrastructure providers to plan sooner.

MATTER 9/J DEKLANDS LTD

j) has the contingency urban extension north of the A26 been justified? What are the circumstances that support the identification of a contingency site here but not elsewhere in the District?

This particular site is included on the basis that it should be brought forward if the other SD9 and SD10 sites fail to come forward. Notwithstanding my evidence on the need to elevate this site to a full allocation to increase the housing land supply towards RSS rates, there is clearly a justification for the site. The evidence in the Council's Landscape Capacity Study, SHLAA and the Sustainability Appraisal, has assessed the site against reasonable alternatives and it has been found to be appropriate in regard to its location, affect on landscape, highways and sustainability credentials. Attached as Appendix 3 is a specific landscape statement considering the merits of the site. This seeks to reinforce the evidence base and demonstrate that the site could be identified as a full allocation rather than as a contingency.

By identifying the site as a contingency the Council are effectively saying that their strategy for the SD10 site could fail to deliver housing or deliver far fewer than they anticipate. This is an unfortunate set of circumstances since Core Strategies are meant to identify the most appropriate strategy. In fact, if delivery of the areas to the south are so uncertain then the SD10 site should not be included in the SCS. Since the contingency site has no delivery issues at all, it should be identified as an allocation.

I am not aware of any other similar circumstances at Wealden settlements which would justify a contingency approach and in that context (if the Council's case is accepted) then this should remain as a contingency site.

MATTER 9/K DEKLANDS LTD

k) Have reasonable alternatives to SD8, SD9 and SD10 been considered – omission sites?

It is the case that we represent the owner of the land north of the A26 which is identified as a reserve or contingency site. In effect this is an omission site as regards formal allocation. The basis of our representations are that this site is needed in addition to SD8, SD9 and SD10. It is also our case that the highway constraints for SD10 place greater weight of argument behind the contingency site being elevated to a formal allocation.

APPENDIX 2 – HIGHWAYS STATEMENT

APPENDIX 3 LANDSCAPE ASSESSMENT