Matter 9/Servomex Limited

Wealden District Council & The South Downs National Park Authority

Core Strategy Examination

Matter 9: Crowborough Area Strategy

Statement on behalf of

Servomex Limited

Prepared by

DPDS Consulting Group

Old Bank House

5 Devizes Road

Old Town

Swindon

Wiltshire

SN1 4BJ

December 2011

WEALDEN DISTRICT COUNCIL & THE SOUTH DOWNS NATIONAL PARK AUTHORITY

CORE STRATEGY EXAMINATION

MATTER 9: CROWBOROUGH AREA STRATEGY

Main issue: Whether the strategy for the Crowborough Area, including the Strategic Development Areas, is soundly based and deliverable

a) Have reasonable alternatives to the strategy been considered?

1. The Core Strategy Spatial Options Consultation in July 2009 set out six strategic spatial housing options and four strategic employment options. These included higher levels of housing and employment land than proposed in the Core Strategy. The Summary of Core Strategy Consultation and Participation Background Paper (BP8) explains at paragraph 7.9 how the Spatial Development Options Consultation has been taken into account.

2. The provision of only 300 new homes in the strategy is lower than any of the options included in the Spatial Options Consultation. Similarly whilst the four strategic employment options appeared to vary the amount of new employment land at Crowborough, the strategy itself does not provide for any new employment land. The constraints of the High Weald Area of Outstanding Natural Beauty and Ashdown Forest are cited as the main reasons for the restrictions on significant growth (Core Strategy paragraph 6.34 and Background Paper BP8 paragraph 7.9). Paragraph 6.35 specifically, states that no other suitable land employment land has been identified within the Crowborough area.

3. However, this overlooks the availability of land at Jarvis Brook, to the west of Palesgate Lane, which is not included in any of the Strategic Development Areas yet is outside the Area of Outstanding Natural Beauty and is well away from Ashdown Forest. The suitability of the land for housing and employment development is discussed further below in response the issue (k).

4. A higher level of housing would help meet the relatively high market demand and also help meet the need for affordable housing as there were 305 households on the housing register in June 2010 (Core Strategy paragraph 6.33). The Core Strategy provision of 300 new

homes would potentially yield only 105 affordable units leaving some 200 households without the accommodation needed. Further employment land would help meet demand and would follow the recommendation in the Wealden and Eastbourne Employment Land Review that Uckfield and Crowborough will need to be the focus for new allocations and that opportunities should also be investigated for expansion of existing business areas at Uckfield (paragraph 10.38 bullet 3).

5. The strategy focuses new employment provision in the north of the District at Uckfield and makes no provision to balance new jobs with new housing at Crowborough. This will increase pressure for out-commuting, contrary to principles of sustainability, and is contrary to the Core Strategy's Spatial Planning Objective SPO6 which states that there will be an increased opportunity for people to work close to where they live, to improve access to jobs, help reduce current levels of net out commuting from Wealden and decrease the net out migration of 15 to 24 year olds.

6. For these reasons, it is not considered that reasonable alternatives to the strategy have been considered.

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

7. The Development of the Proposed Submission Core Strategy Background Paper (BP1) explains how the evidence base from consultations and technical studies has been used to develop the spatial strategy. All the earlier consultation documents, background papers and technical studies are available on the Council's web-site and appear to provide a clear audit trail showing how and why the preferred strategy was arrived at.

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?

8. The Infrastructure Delivery Plan Background Paper (BP11) at Table 1 sets out a number of critical and key infrastructure requirements for growth in the Crowborough area. In regard to SD10, the traffic constraints of Western Road are identified as critical and a potential limiting factor with further work required to identify constraints relevant to specific sites. No

further explanation is included in Appendix A about who is going to deliver the required infrastructure and by when. No infrastructure requirements have been identified in either Table 1 or Appendix A in relation to SD8 or SD9 nor in relation to the reserve site north of the A26 within the AONB. Table 1 and Appendix A explain the requirement for additional waste water capacity and the funding arrangements that are in place to complete a scheme by 2014. Table 1 and Appendix A identify a critical requirement for nursery provision although no timescale is known and there is no contingency if future funding is reduced or cut completely.

9. For these reasons it does not appear that the infrastructure implications of the strategy have clearly been identified and supported by the evidence base in every case nor is it clear who is going to deliver the required infrastructure and by when.

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

10. The contingency site north of A26 within the AONB is identified should housing not be delivered at the preferred locations with the principle risk to the strategy being the traffic capacity constraints along Western Road. As the Core Strategy and the Infrastructure Delivery Plan are relatively silent on the infrastructure requirements of other locations some uncertainty must remain as to whether the strategy is sufficiently flexible to respond to an unexpected change in circumstances. In view of this uncertainty there would be benefit is providing greater flexibility by providing additional development locations that can be readily delivered.

e) Is SD8 justified and deliverable?

11. The loss of large scale office floorspace through redevelopment of the Council offices with housing would inevitably be damaging to the economy of Crowborough and would be contrary to Strategic Planning Objective SPO6 to improve economic prosperity. The Wealden and Eastbourne Employment Land Review recommends that should the Council vacate their offices at Pine Grove, which is well located in the middle of Crowborough, there may be opportunities either through re-use or redevelopment of this building for offices.

12. Re-use of the site for the Pine Grove site for offices must be the primary consideration and redevelopment for housing should only be a last resort. Whilst paragraph 6.35 of the Core Strategy refers to the site offering considerable development potential for a mix of sustainable town centre uses, no reference is made to this in relation to SD8 in paragraph 6.38 (4) which only refers to housing.

13. For these reasons the redevelopment of the Pine Grove site for housing under SD8 in preference to employment use is not justified and additional development locations for housing should be identified. In view of the Council's ownership of the Pine Grove site it would appear deliverable subject primarily to access considerations.

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

14. For the reasons given above in relation to issues (a) and (f) the potential loss of some employment land at SD8 without specific provision for employment uses elsewhere in the Crowborough area is not soundly based. It is contrary to the Core Strategy's Spatial Planning Objective SPO6 and to recommendations in the Employment Land Review. Any loss of land at SD8 adds further justification to allocate new employment land in Crowborough.

g) Is SD9 justified and deliverable?

15. There is little information given about SD9 in the Core Strategy other than the broad location identified on Figure 9 and it does not appear among the Strategic Housing Land Availability Assessment Potentially Suitable Sites Summaries for Crowborough. However, it is located on the edge of the urban area at Jarvis Brook relatively close to services and the main employment areas and would therefore appear a sustainable location for new housing. In the absence of any known constraints SD9 would appear justified but there is no information as to whether SD9 is deliverable.

h) Is SD10 justified and deliverable?

16. Although land covered by SD10 has been assessed through the SHLAA as suitable, available and achievable its justification must be seriously questioned due to the inadequacy of the local road network in the southern part of the town and in particular on Western Road. The inadequacy of the local road network has been a long standing and significant constraint

on development in the southern part of the town and no realistic solutions have ever been identified. The Western Road constraint is referred to in Table 1 of the Infrastructure Delivery Plan where the requirement for further work is referred to. Whether a workable solution to the highway constraint can be identified is questionable and the ability to deliver SD10 is seriously doubtful. Alternative locations for housing development should therefore be identified which would enable the scale of housing at SD10 to be reduced with a greater likelihood that the highway constraint might be satisfactorily addressed.

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

17. Paragraph 5.16 of the Core Strategy states that the phasing of development at SD10 from 2024 is to enable highway issues to be addressed at Western Road. Whilst there are serious doubts over whether highway capacity issues at Western Road can be satisfactorily addressed it is not clear whether the precise date of 2024 is justified or whether it is no more than an arbitrary date a long time in the future.

18. In any event the phasing of housing from 2024 is wholly inappropriate given the need to deliver what is a relatively low level of housing proposed for Crowborough. In effect, over half of the proposed housing in the town, an area of relatively high demand, would not be built for some twelve years or more. This would also seriously restrict the delivery of much needed affordable housing in the town.

19. For these reasons, the phasing of such a large amount of housing to the latter part of the plan period is not justified and alternative development locations should be identified.

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?

20. Justification for the contingency urban extension north of the A26 is stated at paragraph 6.38 (4). It would be required if there are problems with deliverability of housing at the preferred locations. However, an urban extension within the High Weald Area of Outstanding Natural Beauty is not justified when alternative development locations are available outside the designated area which could deliver housing without the need for the potential incursion of urban development into the AONB.

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

21. The Strategic Development Area SD9 as shown on Figure 9 of the Core Strategy should be expanded to include land west of Palesgate Lane at Jarvis Brook. The land is in a sustainable location on the edge of the urban area and is outside the High Weald AONB and is a significant distance from Ashdown Forest. A site plan is attached.

22. The land is included in the Strategic Housing Land Availability Assessment Potentially Suitable Sites Summaries for Crowborough (site reference 064/110). The site has been assessed as suitable, available and economically viable for housing development with a net capacity of 32 dwellings. On a matter of detail, the assessment incorrectly states that the land is allocated for employment use in the Non-Statutory Local Plan which is not the case. However, an alternative use of the land could be for employment purposes which would help provide additional employment land as discussed above.

23. In either case, access is available from the new vehicular access that serves the Servomex building to the west which itself connects with main Millbrook estate road and the local highway network beyond, including the B2100 which connects with A26.

24. For the reasons given there is a strong justification for development of the land for housing or employment purposes. Further consideration should be given to the development of the land through the emerging work on the Strategic Sites DPD and inclusion of the land within an expanded SD9 area would provide the appropriate context for this.

Conclusion

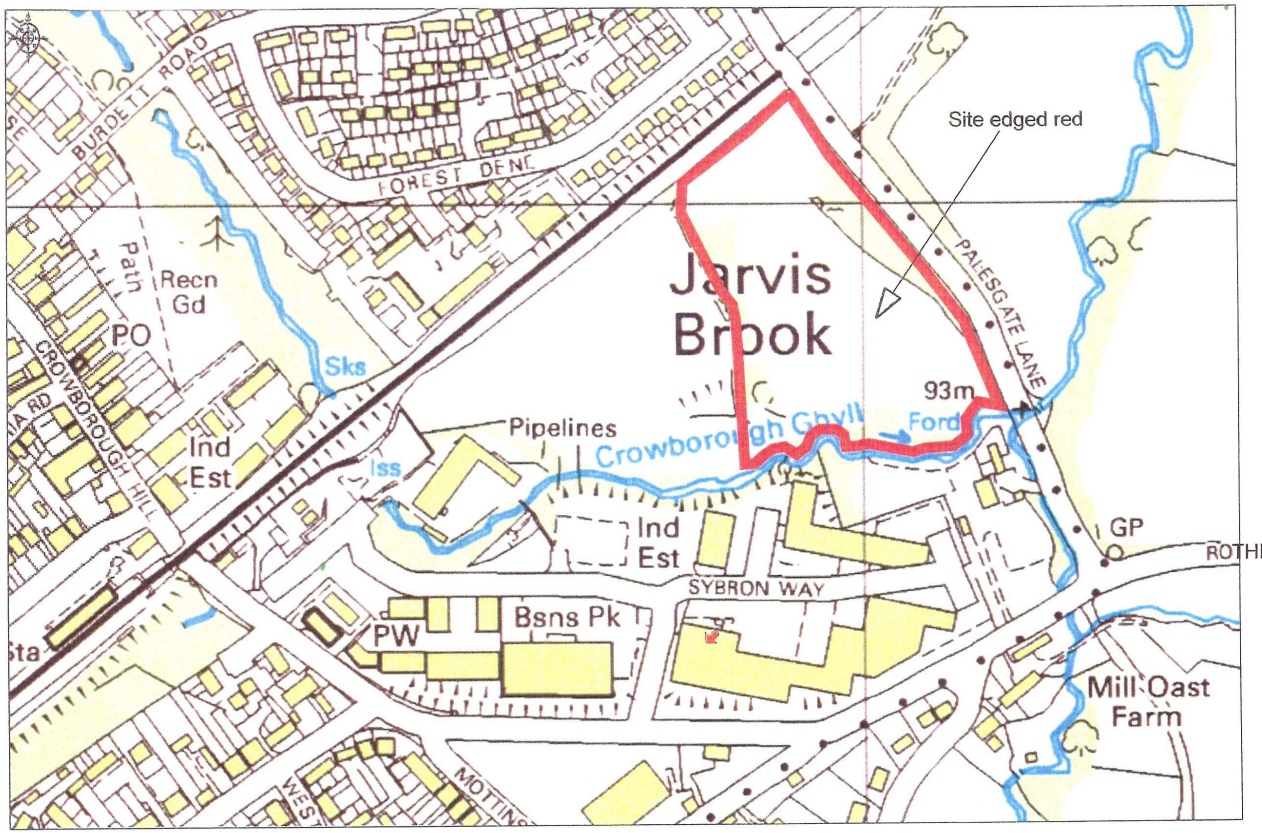
25. For the reasons set out above it is not considered that the strategy for the Crowborough Area, including the Strategic Development Areas, is soundly based and deliverable. Greater flexibility is needed in view of the potential for a higher level of housing development, the uncertainty regarding housing at SD8 and SD10 and the need for further employment land.

26. This should be addressed, in part, by the inclusion of land west of Palesgate Lane within the Strategic Development Area SD9 on Figure 9 and paragraph 6.38 (4) bullet point 1 revised to state:

'Between 140 and 170 dwellings within the urban area, including land in the town centre and at Pine Grove (SD8) and Jarvis Brook (SD9), the precise amount to depend on the provision to be made for the retention of employment in the town centre and the allocation of employment land at SD9.'

27. This revised statement would form the basis for further consideration through work on the Strategic Sites DPD.

Servomex Ltd.
Land West of Palesgate Lane,
Jarvis Brook, Crowborough.



Grid Ref: TQ540299
Not to Scale
September 2008

182 / 00 / 004

Trilogie
corporate real estate
01628 811277