Matter 9 /WDC

Wealden District (Incorporating part of the South Downs National Park)

Core Strategy Hearing

Matter 9: Crowborough Area Strategy
- Statement by WDC/ SDNPA

December 2011

Wealden District Council and South Downs National Park Authority
Response to the Inspector's Matters, Issues and Questions
(Issued 3 November 2011)

Matter 9: Crowborough Area Strategy (WCS2,WCS3,WCS4)

A) Have reasonable alternatives to the strategy been considered?

1.1 Within the Council's issues and Options consultation of 2007 we set out and consulted upon a number of possible spatial objectives for Crowborough , and these were shown in map and tabular form. Part 5 of the document set out our approach and para 5.4 explained why certain broad search areas had been included or excluded at this stage. In looking at the potential priorities and options for each town we set down a brief description of the town together with a series of possible spatial objectives for Crowborough by Figure 14 and Table 2 of that document and in pages 56-59 the main options and alternatives for development in and around Crowborough were identified. Questions 11a -11h sought views. The town is located within the nationally significant landscape of the High Weald Area of Outstanding Natural Beauty - as shown on figure 14 referred to above. The European designated site of the Ashdown Forest abuts the western boundary of the town and these designations have influenced what we have considered as reasonable alternatives to Crowboroughs area strategy.'

1.2 For each of the five broad areas of possible growth which we looked at we set down the approximate scale of development together with identified impacts and issues to be considered in respect of e.g. landscape and biodiversity, transport and accessibility and infrastructure and services. Consultation questions were asked in respect of these possible areas for growth, as identified in the 2007 consultation, together with a further set of questions which also asked whether there was agreement with the broad objectives for the town and if there were any other areas for growth that people felt the Council should consider.

1.3 The evidence base and the development of the six housing options subject of consultation in the Spatial Development Options are documented in the background papers to the 2009 Spatial Development Options Consultation (document references C1-C12). These Options were also subject to Sustainability Appraisal which was published for consultation at the same time as the Spatial Development Options Consultation. The consultation responses to the Spatial Development Options lead to the LDF Sub Committee agreement on 16th December 2009 to a way forward to reduce the amount of alternatives for the purposes of testing, including the need to follow the broad distribution of growth as set out in the South East Plan.

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1.4 Working with the Local Strategic Partnership and other partners we further developed this work through to the 2009 consultation on six possible spatial options for housing growth in Wealden and assessed these against key elements of our emerging vision for growth (paragraphs 2.13-2-19 of 2009) and Part 3 - Strategic spatial housing options. BP8 sets out a summary of consultation and participation in developing our strategy and from which it can be seen that engagement both with the Town Councils and the LSP was an integral part of this process.

1.5 Our SHLAA has further enabled us to test and progress alternatives where we are aware that landowners are willing to work with us to deliver our strategy. However a number of the broad locations considered in 2007 are still being tested in terms of identifying workable solutions to localised traffic issues in the south of the town (Western Road area). We understand that there is no objection in principle from ESCC to development in this areas.

1.6 Background Paper 1 Development of the Core Strategy sets out at pages 51-66 how we have considered the development potential of each of our towns including taking into account emerging or published town masterplans for the area. For each Town we set out matters relating to housing land availability, a sustainability appraisal summary and a strategy for that Town. The sustainability summary is accompanied by a plan showing the broad alternative locations considered for growth in each town. Paragraphs 8.46 - 8.53 of BP1 deal specifically with Crowborough and figure 5 on page 62 shows the broad locations considered and consulted upon. We consider 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 ?

2.1 There is some overlap with the audit trail set out in response to the previous question regarding consideration of broad alternatives for growth in Crowborough and of proposed strategy for the town which details how that strategy for Crowborough and the selected choices of strategic development areas SDA8,SDA9, and SDA10 were arrived at.

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2.2 The matter of ***how*** the strategy was arrived at is partly covered above in the answer to the previous question but is further supported by the consultation work carried out in 2007 and also in respect of the emerging town masterplans. Crowborough has produced its own town masterplan "Top of the Weald" and production of this has been supported by the District Council both financially and through officer advice and support. BP7 (Summary of town masterplans) identifies the work that has been carried out locally and details how this has helped shape the development of the Core Strategy Background Paper 7 (BP7) section 3, paragraphs 3.1 - 3.27 details some of the main elements of the masterplan for the town.

2.3 This work has helped to identify Town Objectives which have then informed the strategies for the towns themselves and as set out in the Core Strategy. Paragraph 5.7 of BP10 Sustainability Appraisal of the Core Strategy refers specifically to Crowborough and the 8 identified objectives for the town.

2.4 The submitted Sustainability Appraisal for the Core Strategy, Background Paper 10 also helps in showing both how and why the given strategy is arrived at. It details from paragraph 5.7 of the document the objectives for each of the Towns, objectives arrived at following widespread consultation and building upon the 2007 work. We then list each of the principal Objectives for each of the Towns and explain that these have helped shape and inform the strategies for each of the Towns which appear in the Core Strategy itself. Paragraph 5.7 sets out those eight objectives for Crowborough. At Figure 8.3 we set out the broad locations for development being considered and a detailed commentary on these when assessed against the Councils approved sustainability objectives. These are set out for Crowborough, and indeed for all of the towns, as assessed against social, environmental and economic objectives. Pages 79-82 of BP10 refer to the assessment of broad locations for Crowborough.

2.5 In arriving at **why** the strategy has been selected the SA also identifies for each Town the broad and reasonable alternatives considered and sets down a summary of the reasons why any particular area was selected or not taken forward. In respect of the broad locations for Crowborough this is set out at page-103 of BP10.The SA process, which has been integral to the development of the Core strategy also sets out in Table 9.1 of BP10 how each of the Policies within the CS (including WCS2,3and 4) fare when assessed against each of the Councils 22 adopted sustainability objectives. We conclude that this work demonstrates both how and why we have arrived at the preferred strategy and the selection of the various SDAs (SDA8-10) identified for growth of Crowborough.

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2.6 The background papers supporting the SA of the Core Strategy set out in specific detail (Document reference A3, SA background paper 5 - page 193) the sustainability appraisal of the broad locations for the development of each of the towns. Appendix 1 of this paper, at pages 207-212 shows the broad locations for growth considered whilst Appendix 2 Matrix tables shows the full assessment of broad locations at pages 213-237. This detailed work further supports why the preferred strategy and choice of strategic development areas has been 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 ?

3.1 Our strategy is supported by our Infrastructure Delivery Plan, which is a living document and has been compiled with inputs from all relevant infrastructure providers. As this is a "living" document and one that will be being updated by partners in respect of their various interests and responsibilities there are two submitted background papers BP11 and BP11 "proposed changes".

3.2 Within BP11 at page 29,Table 1, we set out in tabular form any key or critical infrastructure requirements to support the growth identified for Crowborough at Strategic Development Area SDAs 8, 9 and 10. Whilst each of the various possible infrastructure matters associated with development are set down in the table there are identified critical capacity issues predicted for nature conservation & biodiversity, transport and education (all phases).

3.3 For waste, or waste water, and health no particular issues are identified. We identify that ESCC Children's services has indicated that they would maybe need to consider the implications further and that provision as outlined in the table may require adjustment.

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3.4 The District Council has recently resolved to publish its draft Strategic Sites DPD for public consultation under Regulation 25 and where this further work on necessary infrastructure will be developed. In Appendix A of our IDP (pages 57 -77) we set out the responsible agency for each type of infrastructure funding arrangements, costs (where known) status of schemes, risks and lead agency for delivery. The IDP itself and the tables within it have been compiled and updated on the basis of close consultation with each of the infrastructure providers in respect of the proposed growth in the core strategy and based upon their information as provided to us . This has included the sharing of the information from an extensive LDF evidence base with partners and providers of infrastructure.

3.5 In respect of Crowborough there are currently no changes needed in respect of the IDP Table 1 (BP 11 Infrastructure Delivery Plan - proposed changes). In conclusion we therefore consider that the infrastructure implications for SDA8-10 Crowborough have been clearly identified, are supported by the evidence base , and the responsibility for any provision of infrastructure made clear.

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

4.1 Yes. Firstly the amount of SHLAA suitable land within the combined SDAs exceeds the amount of growth identified in the CS (300 units) that can be accommodated without breaching Habitats Regulations. We are also aware from discussions with landowners and agents affected that sufficient land is available to allow for the provision of any necessary SANG provision. The further work which we have already commenced on publication for consultation of our strategic sites development document (SSDPD), including through SA work, shows that there is considerable flexibility in delivering this level of growth.

4.2 In view of locally expressed concerns regarding the ability of the local road network to accommodate this level of growth, especially within the area of Western Road, the CS identifies a possible contingency site for development alongside the A26 to the north of the town. This area is not favoured over the broad areas identified as SDA8-10 owing to its AONB location (indeed the High Weald AONB Unit did lodge concerns) however it was felt prudent to do so.

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4.3 ESCC as Highway Authority has confirmed to us that there is no objection in principle from a highways perspective to development of the quantum of housing proposed from within the identified SDAs but that it is more about finding a workable engineering / transport solution.

E) Is SDA8 justified and deliverable?

5.1 In our response to part A of Matter 9 we set out how the 2007, 2009, SHLAA and other evidence have identified broad areas for growth. This response centres upon the justification of the choice of any particular SDA.

5.2 SDA 8 within the Core Strategy broadly covers land in the ownerships of the East Sussex County Council and Wealden District Council. The broad area is identified as Crowborough Town Centre with Pine Grove re development in the key diagram within the Core Strategy. Much of the broad area is covered by Policy CR8 of the Wealden non statutory plan which identifies the area as suitable for mixed use for leisure, housing, community and office purposes.

5.3 At para 6.35 of the Core Strategy we detail the decision of the District Council to move from their existing offices at the Pine Grove site to a single site in Hailsham and confirm that this town centre location will therefore become available within the first five years of the plan and could provide opportunity for a mix of sustainable town centre uses. This general approach is mirrored within the "Top of the Weal "document masterplan produced by the Town Council.

5.4 Our sustainability appraisal (BP 10) sets out at page 40 the key objectives for the Town and details at bullet point 7 the wish to grasp the opportunity afforded by the proposed move of the District Council offices from Crowborough. Section 6 of the SA shows how the main strategic options were considered and why and section 8 of that document deals with the broad locations for the towns and sets out at table 8.5 9 page 79 of BP10 how these areas perform when assessed against the Councils agreed sustainability objectives. A summary of this process, for each of the possible growth areas, is set out at section 8 of the background paper 1 (BP1) of development of the Core strategy. The assessment of SDA8 is set out at paragraph 8. 47. We conclude that the selection of SDA8 is justified.

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5.5 In terms of deliverability a report was prepared by the Council's Director of Corporate Services from the perspective of the Council as landowner and for consideration by our 31 August 2011 Cabinet meeting setting out the suggested disposal strategy for the Council's landholdings at SDA8 including broad timescales and the need to undertake a variety of consultation with interested parties. The first stage of this is underway and includes consultation with Crowborough Town Council, the Crowborough Community Association, the Crowborough Partnership and the Crowborough Chamber of Commerce as well as an open request for views from other organisations, groups and individuals.

5.6 As a result the Council has received a range of feedback and views which will be taken into account as we move to the next stage of developing the brief for disposal with our consultants. Updates on progress, including the development of the brief for disposal, will take place regularly as will further consultation before any final decisions are taken.

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

6.1 The loss of employment land at SD8 is an assumption which in practice may not occur. There are a number of employment options which are being considered for this area, particularly for the existing Pine Grove office building. These include the proposals made in the report jointly commissioned by WDC's Corporate Assets and Planning Policy from Workbase Plus to look at commercial options for the Pine Grove offices. The conclusions in this report include the potential for the development of an Enterprise hub. The report from Workbase Plus is posted on the Council's website and forms part of the evidence base for the LDF.

6.2 Other options include work/live housing units and a range of suggestions which have come forward from the consultation outlined in the reply above, all of which will be considered before a final decision is made.

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G) Is SD9 justified and deliverable?

7.1 In our response to part A of Matter 9 we set out how the 2007, 2009, SHLAA and other evidence have identified broad areas for growth. This response centres upon the justification of the choice of any particular SDA.

7.2 Our sustainability appraisal (BP 10) sets out at page 40 the key objectives for the Town and details 8 bullet points to assist in meeting the spatial objectives of the core strategy and how these then relate to the town. Section 6 of the SA shows how the main strategic options were considered and why and section 8 of that document deals with the broad locations for the towns and sets out at table 8.5 (page 79 of BP10) how these areas perform when assessed against the Councils agreed sustainability objectives. A summary of this process, for each of the possible growth areas, is set out at section 8 of the background paper 1 (BP1) of development of the Core strategy. The assessment of SDA9 is set out within this BP and at paragraph 8. 48 which relates to the SDA in the Jarvis Brook / South eastern area of the town and where we emphasise that a number of these sites are brownfield land, have good links to the train station and local service centres and lie outside of the AONB. We identify that some mitigation measures will be necessary in respect of the Ashdown Forest SPA. We conclude that the selection of SDA9 is fully justified. Our SHLAA evidence, coupled with initial discussions with landowners and ESCC also lead us to be confident that growth can be delivered here.

H) Is SD10 justified and deliverable?

8.1 As referred to above in our response to part A of Matter 9 we set out how the 2007, 2009, SHLAA and other evidence have consulted upon and subsequently identified broad areas for growth. This response centres upon the justification of the selection of SDA10.

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8.2 Our sustainability appraisal (BP 10) sets out at page 40 the key objectives for the Town and details 8 bullet points to assist in meeting the spatial objectives of the Core Strategy and how these then relate to the town. Section 6 of the SA shows how the main strategic options were considered and why and section 8 of that document deals with the broad locations for the towns and sets out at table 8.5 (page 79 of BP10) how these areas perform when assessed against the Councils agreed sustainability objectives. A summary of this process, for each of the possible growth areas, is set out at section 8 of the background paper 1 (BP1) of development of the Core Strategy - The assessment of SDA10 is set out within this BP at page 63 and at paragraph 8. 49 which relates to the SDA in the south of Crowborough where we emphasise that a number of these sites have good links to the train station and local service centre and services and lie outside of the AONB. We identify that some mitigation measures will be necessary in respect of Ashdown forest SPA. We conclude that the selection of 10 is fully justified. Our SHLAA evidence, coupled with initial discussions with landowners and ESCC also lead us to be confident that growth can be delivered here. Landowners and their agents have been in touch with ESCC regarding resolution of local traffic issues and are also aware of the necessity for SANGs provision and the likely amount of such.

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

9.1 We are aware that the development within this area will necessitate the implementation of local infrastructure improvements for this development to be sustainable. This is reflected and indeed confirmed in the statement submitted to this Hearing by ESCC in respect of infrastructure and particularly highways matters .It will also be necessary, and prior to the granting of permissions to ensure implementation of any mitigation required in respect of Habitats Regulations. On these two principal grounds and to ensure the timely provision of such we consider that the phasing of growth here is necessary. This accords fully with RS Policy CC7 which requires the scale and pace of growth to be dependent upon the infrastructure capacity to be available to support growth.

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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?

10.1 As with our replies in respect of SD8, 9 and 10 we have consulted upon, gathered evidence from our SHLAA and assessed as part of the sustainability appraisal process all of the broad areas for growth put forward and selected. Figure 5 of BP1 shows this broad area of land to the north of the town, alongside the A26.

10.2 Page 63, paragraph 8.50 of BP1 summarises our assessment of the area and its potential advantages and disadvantages for delivery of growth. Whilst our identified contingency site for growth at Crowborough does lie some distance from the town and thus would do less for regeneration of the town it does have good links to leisure facilities and to Tunbridge Wells. However the land does lie within the High Weald AONB. Whilst its distance from the town and the lesser potential regeneration benefits for the town that growth here would bring are seen as disadvantages the broad location does have good links to leisure facilities and Tunbridge Wells. These attributes potentially outweigh the fact that the land lies within the AONB but would very much only be seen as a contingency choice if required.

10.3 This area is required as contingency whilst we further develop through our Strategic Sites DPD and with landowners, developers and ESCC a solution to the acknowledged local transport issues centred upon the western road area. Whilst we currently understand from ESCC that there is no objection in principle to growth in SD9 and SD10, SD10 in particular has not yet been able to offer up a proposed transport solution that the County Council considers would work. On this basis and with the land north of the A26 being deemed SHLAA suitable we consider it prudent to identify a contingency site if our preferred choices cannot yield the necessary identified levels of growth.

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K) Have reasonable alternatives to SD8,SD9 and SD10 been considered-omission sites ?

11.1 Yes. The 2007 Issues and Options consultation also identified the area to the north/ north east of the town. (Options to the east of the town were discounted early on in view of the designated area of the Ashdown Forest which abuts the eastern boundary of Crowborough). Whilst these broad areas were not expressly discounted from the 2009 spatial options for development consultation in 2009 the results of the consultation favoured areas closer to the town and those lying outside of the AONB. This was reinforced by evidence arising from our SHLAA process which generally found sites and land to the north/ north east of the town unsuitable.

11.2 Our SA process (BP10 pages 79-82 and Figure 8.3 show this) also indicates that the area to the north and north east of the town does not fare as well when assessed against other and better broad locations for growth. This is reinforced by BP1pages 62-64 , paragraphs 8.46 and 8.51 which confirm that although alternative broad locations/sites were considered these did not fare as well as better and subsequently selected SDAs since they were located within the designated AONB and relatively removed from the town centre and other local centres.