Wealden Economy Study

Duty to Co-Operate Note

1.1 As part of the Wealden Economy Study we have been asked to share a summary of our research with neighbouring local authority areas at two stages of the study, which were:

- initial views on the Wealden District’s functional economic area (FEA)
- following submission of final draft Economy Study to Wealden District Council.

1.2 As part of the duty to co-operate exercise the following individuals within Wealden’s neighbouring authorities have been contacted, and invited to comment / share their views on the emerging findings.

<table>
<thead>
<tr>
<th>Name</th>
<th>Local Authority</th>
</tr>
</thead>
<tbody>
<tr>
<td>David Marlow</td>
<td>Rother District Council</td>
</tr>
<tr>
<td>Robert King</td>
<td>Lewes District Council</td>
</tr>
<tr>
<td>Lisa Rawlinson</td>
<td>Eastbourne Borough Council</td>
</tr>
<tr>
<td>John Cheston / Alice Henstock</td>
<td>Mid Sussex District Council</td>
</tr>
<tr>
<td>Sharon Evans</td>
<td>Tunbridge Wells Borough Council</td>
</tr>
<tr>
<td>Kerry Culbert</td>
<td>Hastings Borough Council</td>
</tr>
</tbody>
</table>

1.3 Individuals were contacted on the following dates and were asked to comment / share any views. Additional reminders were sent two weeks after initial contact:

- FEA stage: 15th September 2016
- Final draft: 21st February 2017

Functional Economic Area Stage

1.4 Following completion of our assessment of the Wealden District’s functional economic area (FEA) a summary of the FEA note was sent to all contacts. The table below lists the comments received about our definition of the FEA and any actions undertaken to address these. Copies of the original responses (in email form) are attached at the back to this note.

<table>
<thead>
<tr>
<th>Name</th>
<th>Comment</th>
<th>Action</th>
</tr>
</thead>
<tbody>
<tr>
<td>Kerry Culbert (Hastings BC)</td>
<td>• No comments at this stage</td>
<td>• n/a</td>
</tr>
<tr>
<td>Sharon Evans (Tunbridge Wells BC)</td>
<td>• Wealden’s relationship with Tunbridge Wells aligns with TWBC’s analysis highlighting commuting flows.</td>
<td>• n/a</td>
</tr>
<tr>
<td></td>
<td>• Interested to read more about assessing employment growth and resultant need to ensure no potential conflicts</td>
<td>• Agreed to share final copy of the Employment Study once completed</td>
</tr>
<tr>
<td>David Marlow (Rother DC)</td>
<td>• RDC does not agree with Rother’s inclusion in Wealden’s HMA</td>
<td>• n/a</td>
</tr>
</tbody>
</table>
RDC’s position is that Wealden is split economically, with the north closely linked with Tunbridge Wells, and the south with Eastbourne.

Suggested that starting with Wealden District Council as one spatial area creates a non-functional area.

Agreed with the client that no changes required to FEA as our research points to a strong link with Rother.

Final Draft Stage

1.5 Following completion of the Wealden District economy study we were asked to send the final version to the neighbouring local authority areas who were asked to provide their views and/or comments about the study. Once again, the table below lists the comments received following completion of the Economy Study and the actions we took to address these. Copies of the original responses (in email form) are attached at the back to this note.

<table>
<thead>
<tr>
<th>Name</th>
<th>Comment</th>
<th>Action</th>
</tr>
</thead>
<tbody>
<tr>
<td>Sharon Evans (Tunbridge Wells)</td>
<td>• Conclusions seem sensible and uses a similar method and forecasting method as that used by own consultants</td>
<td>• n/a</td>
</tr>
<tr>
<td>Alice Henstock (Mid Sussex)</td>
<td>• No comments</td>
<td>• n/a</td>
</tr>
<tr>
<td>David Marlow (Rother District Council)</td>
<td>• FEA remains unchanged. • RDC does not agree with the District’s inclusion in Wealden’s HMA.</td>
<td>• Agreed with the client that no changes required to FEA as our research points to a strong link with Rother</td>
</tr>
<tr>
<td></td>
<td>• Based on 1% jobs growth, doesn’t consider Wealden’s economy to be buoyant.</td>
<td>• Other indicators assessed in the study suggest that the economy is buoyant</td>
</tr>
<tr>
<td></td>
<td>• Wonders how decision to expand Heathrow Airport (instead of Gatwick) and Brexit will affect projections.</td>
<td>• These issues were outside of the scope of our work.</td>
</tr>
<tr>
<td></td>
<td>• Important to note that employment forecasts and labour forecasts are based on trends (ie. policy off) and to highlight the difference between these and recent completions</td>
<td>• Distinction is already made in full version of the report.</td>
</tr>
</tbody>
</table>
Functional Economic Area Stage – Email Correspondence
Luke Bonnici

From: David Marlow <David.Marlow@rother.gov.uk>
Sent: 26 September 2016 17:04
To: Luke Bonnici
Cc: Margaret Collins; Marina Briggshaw
Subject: RE: Wealden Retail and Economy Study - duty to co-operate

Luke,

Thank you for this. Sorry for delay responding but had to prioritise putting our new Local Plan to bed for cabinet shortly.

Anyway, it is an interesting piece of work.

As Marina may have said, while you draw heavily on the SHMA, RDC was not convinced about Rother’s inclusion in the HMA – which may be an issue for examination depending on the inferences drawn. (No doubt other will have other issues with it as well.)

RDC’s position has consistently been that Wealden is really split economically, with the north of the District closely linked to T Wells and the south with Eastbourne. This argument is actually reinforced by the recent TTWAs. As you can see, Rother is for the far greater part within the Hastings TTWA. Indeed, it seems that this should be a conclusion of your work, looking at the various statistics shown.

I would suggest that by starting with WDC as the spatial unit, it creates a somewhat non-functional area! The evidence actually suggests to me that Tunbridge Wells/Tonbridge is the basis of one functional area, Eastbourne another, Hastings (which includes Rother) another.

We acknowledge that the evidence provided does show some linkages, not surprisingly, between Wealden and Rother, but the report fails to acknowledge the hugely stronger links between Rother and Hastings. This should be referenced.

Is there an expectation of non-overlapping FEMAs in the same way I am pleased to see has now been confirmed for TTWAs?

Also, please can you advise on how your eventual definition of the FEMA will be used and whether your study will be looking at economic land/floorspace needs across the whole FEMA?

I would point out that this is not regarded as necessary or appropriate, both because the economic links are not so strong as to justify it and because we – together with Hastings BC! – have already identified the joint business land/floorspace needs across our economic area, which are carried into our adopted Plans.

I look forward to hearing from you.

Regards,

David Marlow
Planning Policy Manager
Strategy & Planning Service
Rother District Council
From: Luke Bonnici [mailto:l.bonnici@regeneris.co.uk]
Sent: 15 September 2016 14:23
To: Luke Bonnici
Cc: Margaret Collins; Marina Briginshaw
Subject: Wealden Retail and Economy Study - duty to co-operate

Dear all,

Regeneris Consulting and Carter Jonas have recently been commissioned by Wealden District Council to undertake an Economic and Retail Study to inform the new Wealden Plan. Your contacts were provided to us by Marina Briginshaw at Wealden District Council.

As part of the duty to co-operate requirements we have been asked to share our assessment of the Wealden District’s functional economic market area, which forms the basis of the Economy Study.

Please treat the attached document in confidence.

At the stage we are keen to receive any views and/or comments you may have on our definition of the Wealden District’s functional economic area.

Should you have any questions and/or queries about the attached, please do not hesitate to get in touch with either myself or my colleague Margaret Collins (Director at Regeneris).

Thank you very much and best wishes

Luke

Luke Bonnici | Consultant
l.bonnici@regeneris.co.uk
T: 0207 336 6188
M: 0783 353 0372

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<th>Report a missed bin</th>
<th>Planning online</th>
<th>Voting</th>
<th>When is my bin day?</th>
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Dear Luke

I’m sorry for my rather slow response to your email. I can confirm that HBC has no comments on the draft study at this stage.

kind regards
Kerry Culbert
T:01424 783304

Dear all

Regeneris Consulting and Carter Jonas have recently been commissioned by Wealden District Council to undertake an Economic and Retail Study to inform the new Wealden Plan. Your contacts were provided to us by Marina Briginshaw at Wealden District Council.

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Thank you very much and best wishes

Luke

Luke Bonnici | Consultant
l.bonnici@regeneris.co.uk
T: 0207 336 6188
M: 0783 353 0372

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Read our latest:
Dear Luke

Thank you for sending through the attached document in relation to the Wealden Retail and Economy Strategy.

You may be aware, that we are currently in the process of updating our own Economic Needs Study and Retail and Leisure Study in order to inform our new Local Plan. The Economic Needs Study is almost complete and I have therefore spoken to our consultants (Turley Economics) to see what their views are on the document as although in our study it has been recognised that there are linkages between Tunbridge Wells and Wealden in terms of travel to work/commuting patterns etc, Wealden is not considered to form part of our Functional Economic Area. They have provided me with the following comments.

“Firstly, it is notable that Regeneris’ analysis of the FEMA follows a similar methodology to our own in terms of looking at travel to work areas/commuting patterns, housing market areas and existing economic geographies. Their report also considers other factors, such as flows of goods and services and transport infrastructure, but gives less weight to these.

Regeneris conclude that there is a functional link between Wealden District and almost all neighbouring authorities, including Tunbridge Wells Borough. The relationship between Tunbridge Wells Borough and Wealden District aligns with our own analysis which highlights an important inflow of commuters from Wealden into the Borough. However, the fact that we do not identify Wealden within our FEMA is not a cause for concern - there is often overlap between FEMAs and the analysis will be sensitive to the geography of analysis, which in our case included consideration of the FEMA for both Sevenoaks and Tunbridge Wells. Our conclusion is further supported by the fact that West Kent is already a recognised economic geography, which provides assurance that this is an appropriate geography across which to assess economic development needs”.

I think we would be interested though in your approach to assessing and reporting on employment growth and resultant employment needs across the identified FEMA to ensure that there are not any potential conflicts with our own conclusions and approach in our respective Local Plans. Perhaps you can keep us updated with the progress with your work and emerging findings.

In respect of our Retail and leisure Study – we have just commissioned this work and it is still in its early stages of data gathering. Our consultants (Nexus Planning) have reviewed the study catchment area which does include parts of Wealden District (as it has within our previous studies) and therefore residents of Wealden District have been included within our Household Survey that has recently been completed and will inform the later stages of the work.

I hope that helps, but do please get back to me if you wanted to have a further discussion or need any further information about the studies that we are currently carrying out.

Kind regards

Sharon

Sharon Evans
Principal Planning Policy Officer
From: Luke Bonnici [mailto:l.bonnici@regeneris.co.uk]
Sent: 15 September 2016 14:23
To: Luke Bonnici
Cc: Margaret Collins; Marina Brigginshaw
Subject: Wealden Retail and Economy Study - duty to co-operate

Dear all,

Regeneris Consulting and Carter Jonas have recently been commissioned by Wealden District Council to undertake an Economic and Retail Study to inform the new Wealden Plan. Your contacts were provided to us by Marina Brigginshaw at Wealden District Council.

As part of the duty to co-operate requirements we have been asked to share our assessment of the Wealden District’s functional economic market area, which forms the basis of the Economy Study.

Please treat the attached document in confidence.

At the stage we are keen to receive any views and/or comments you may have on our definition of the Wealden District’s functional economic area.

Should you have any questions and/or queries about the attached, please do not hesitate to get in touch with either myself or my colleague Margaret Collins (Director at Regeneris).

Thank you very much and best wishes

Luke

Luke Bonnici | Consultant
l.bonnici@regeneris.co.uk
T: 0207 336 6188
M: 0783 353 0372

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Final Draft Stage – Email Correspondence
Dear Luke,

We have no comments to make on the Retail and Economic Study.

Regards,

Alice Henstock
Senior Planning Officer
Planning Policy and Economic Development
Economic Promotion and Planning
01444 477394
alice.henstock@midsussex.gov.uk
www.midsussex.gov.uk

Working Together for a better Mid Sussex

Hi Alice

Yes, of course, see the attached.

It would be good if you could send us any comments by the end of this week, however given the short notice, first thing on Monday morning would be fine.

Thank you very much

Luke

Luke Bonnici | Consultant
l.bonnici@regeneris.co.uk
T: 0207 336 6188
M: 0783 353 0372

Read our latest:

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From: Alice Henstock [mailto:Alice.Henstock@midsussex.gov.uk]
Sent: 16 March 2017 13:30
To: Luke Bonnici <l.bonnici@regeneris.co.uk>
Subject: RE: Wealden Retail and Economic Study - Executive Summary - duty to co-operate

Dear Luke,

Please could you resend the documents to us, as I cannot find your original email.

Many thanks,

Alice Henstock
Senior Planning Officer
Planning Policy and Economic Development
Economic Promotion and Planning
01444 477394
alice.henstock@midsussex.gov.uk
www.midsussex.gov.uk

Working Together for a better Mid Sussex

From: Luke Bonnici [mailto:l.bonnici@regeneris.co.uk]
Sent: 10 March 2017 09:23
To: Luke Bonnici
Subject: RE: Wealden Retail and Economic Study - Executive Summary - duty to co-operate

Dear all,

A couple weeks ago we sent you a copy of the executive summary of the Wealden District’s economy study, and asked you for any views / comments you might have.

To date, we have not heard from you. I wanted to make sure that this is because you have no views / comments. If that is not the case, I would really appreciate it if you could send us your views / comments at the earliest convenience as we are keen to progress with the duty to co-operate stage and conclude our study.

Looking forward to receiving any comments you might have.

Best wishes and kind regards

Luke
From: Luke Bonnici
Sent: 21 February 2017 13:27
To: Luke Bonnici <l.bonnici@regeneris.co.uk>
Cc: Margaret Collins <m.collins@regeneris.co.uk>; 'Marina Briggshaw' <Marina.Briggshaw@wealden.gov.uk>
Subject: Wealden Retail and Economic Study - Executive Summary - duty to co-operate

Dear all

Regeneris Consulting and Carter Jonas were commissioned (in June 2016) by Wealden District Council to undertake an Economic and Retail Study to inform the new Wealden Plan. Your contacts were provided to us by Marina Briggshaw at Wealden District Council.

As part of the duty to co-operate requirements we have been asked to share an executive summary of the Economy Study with you. This follows from an email I sent on the 15th of September last year in which we shared our assessment of the Wealden District’s functional economic market area.

Please treat the attached document in confidence.

We are keen to receive any views and/or comments you may have about the study.

Should you have any questions and/or queries about the attached, please do not hesitate to get in touch with either myself or my colleague Margaret Collins (Director at Regeneris Consulting).

Thank you very much and best wishes

Luke
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Luke Bonnici

From: David Marlow <David.Marlow@rother.gov.uk>
Sent: 15 March 2017 09:26
To: Luke Bonnici
Cc: Kerry Culbert (kculbert@hastings.gov.uk)
Subject: RE: Wealden Retail and Economic Study - Executive Summary - duty to co-operate

Luke,

Sorry for slight delay, but urgent matters to attend to.

Anyway, my comments largely follow on from those sent on 26/9/16 and I would refer you to those.

You did say that you would consider what I’d said, although I see that the FEA is unchanged.

Of course, you have only provided the Executive Summary, so I don’t know what discussion there is of the FEA in the main report.

As said previously RDC was not convinced about Rother’s inclusion in the HMA, believing that Wealden is really split economically, with the north of the District closely linked to Tunbridge Wells and the south with Eastbourne. This argument is actually reinforced by the recent TTWAs.

As far as Rother is concerned, our view is that the District relates, in economic terms, for the greater part to Hastings, confirmed by its inclusion in the Hastings TTWA.

I would ask that this position is noted in your report, as is the anomaly created for Hastings of not including its principal catchment – Rother – in the same FEA as it. Transport links are relevant and it should be noted that Hastings/Rother has the A21 as its north-south transport spine, while Eastbourne/Wealden has the A22/A26.

Turning to the actual substantive content of the report, I note that jobs growth has been 1% over the last 5 years (in ix on page ii). This does not suggest such a buoyant economy? I am struggling to reconcile this percentage with the graph on page iii. I assume that the y axis is jobs in the district, as a basis for projecting future job growth?

I wonder if the decisions about the location of more air traffic capacity at Heathrow rather than Gatwick, or Brexit, likely to affect projections? (I note the final bullet on page viii covers these issues in broad terms, but just wondered how it could affect the quantitative analysis?)

Again, without seeing the full report, it is difficult to comment on the figures on page v, but it seems to suggest that there was some unmet demand that was met by recent completions, while the economic and labour supply forecasts going forward suggest that this will not continue? I suppose that a qualification to this is that this is trend information and does not factor in any significant policy or infrastructure changes. If these justify a higher growth, (maybe major A27 improvements), they should be set out.

I look forward to seeing the full report.

Best wishes,

David

David Marlow
Planning Policy Manager
Strategy & Planning Service
Rother District Council
Dear all

Regeneris Consulting and Carter Jonas were commissioned (in June 2016) by Wealden District Council to undertake an Economic and Retail Study to inform the new Wealden Plan. Your contacts were provided to us by Marina Brigginsaw at Wealden District Council.

As part of the duty to co-operate requirements we have been asked to share an executive summary of the Economy Study with you. This follows from an email I sent on the 15th of September last year in which we shared our assessment of the Wealden District’s functional economic market area.

Please treat the attached document in confidence.

We are keen to receive any views and/or comments you may have about the study.

Should you have any questions and/or queries about the attached, please do not hesitate to get in touch with either myself or my colleague Margaret Collins (Director at Regeneris Consulting).

Thank you very much and best wishes

Luke

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Dear Luke

Apologies for the delay in getting back to you, but I have now had a chance to have a look through the Executive summary of the Wealden Economy Study.

From reading through the report, the assessment and conclusions seem sensible and you have used a similar methodology and forecasting model as our own consultants (Turley Economics) have used for our recently completed Economic Needs Study (2016).

As I think we previously commented on – you have included Tunbridge Wells within your FEMA, and although our study does not specifically include Wealden with our FEMA (but focuses more on the West Kent Area), it does make reference to the fact that there are links between Tunbridge Wells and Wealden with regards to travel to work areas etc.

Will you also be producing an Executive Summary of the Retail study in the same way as you have for the Economic Study? I ask this as we are currently in the process of finalising our Retail and Leisure Study (with consultants Nexus) and it would be interesting to see what your document is saying in relation to any links with Tunbridge Wells Borough on the retail side as obviously Royal Tunbridge Wells Town is quite a draw in retail terms to residents of the north of Wealden District.

Many thanks for providing us with the opportunity to see/comment upon the findings of this study.

Kind regards

Sharon

---

From: Sharon Evans <Sharon.Evans@Tunbridgewells.gov.uk>
Sent: 02 March 2017 11:31
To: Luke Bonnici
Cc: Margaret Collins; Marina Brigginslaw
Subject: RE: Wealden Retail and Economic Study - Executive Summary - duty to co-operate
Regeneris Consulting and Carter Jonas were commissioned (in June 2016) by Wealden District Council to undertake an Economic and Retail Study to inform the new Wealden Plan. Your contacts were provided to us by Marina Brigginnshaw at Wealden District Council.

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Thank you very much and best wishes

Luke

Luke Bonnici | Consultant
l.bonnici@regeneris.co.uk
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