How to Contact Us

Planning Policy
Wealden District Council
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Office hours Monday, Tuesday, Thursday, Friday 8.30am to 5.00pm and Wednesday 9.00am to 5.00pm

You may also visit the offices Monday to Friday, to view other Local Plan documents.

A copy of the Wealden Local Plan and associated documents can be downloaded from the Planning Policy pages of the Wealden website, www.wealden.gov.uk/planningpolicy or scan the QR code below with your smart phone.

If you, or somebody you know, would like the information contained in this document in large print, Braille, audio tape/CD or in another language please contact Wealden District Council on 01323 443322 or info@wealden.gov.uk
RE: East Sussex Growth Strategy - Growth Indicators Rationale

Sent: 19 December 2014 15:36
From: RDS
To: ESCC, WDC, ESCC
CC:

Thanks for your help on this.

It’s my last day before my hols, so best wishes to you – and of course and for a very happy Christmas,

Regards,

RDC

Planning Policy Manager
Rother District Council
Town Hall
Bexhill on Sea
East Sussex
TN39 3JX

www.rother.gov.uk

From: ESCC
Sent: 19 December 2014 15:09
To: WDC, RDC, ESCC
CC:
Subject: RE: East Sussex Growth Strategy - Growth Indicators Rationale

Hi and

Just to let you know I passed on your comments and as a result the document has been changed and now does not include job numbers. For more detail on this and the Growth Strategy please contact ESCC

Kind regards,

ESCC

http://archivemanager.wealden.gov.uk/app.html#/message/0908209e-e5b6-fd8e-4e5d-be0c031d8da5/20/12/2018:6:43:57
Hi ESCC and RDC,

Thank you for responding. I am currently up to my eyes in SSLP submission and would want to respond fully tomorrow, however I am conscious of deadlines. There are issues here for Wealden (and I have not yet looked into the job number element for floorspace). My primary concern is that as Wealden is dealing with now an emerging plan (which will cover the timeframe of the Growth Strategy) and a SHMA that relates closely to job growth we are not in a position to simply agree these numbers. Our SHMA is not yet published and we are currently in discussions with our consultants as to the most appropriate job growth figures to use and their implications. This SHMA requires to be discussed with other authorities under the DTC, and as a result I feel that by agreeing these projections (as I said I haven’t looked at floorspace) I would be putting Wealden at a disadvantage for the emerging evidence bases. This is also in the context that I have not been able to provide an opportunity for my Members to discuss different forecasts for job growth and the resulting impact on the emerging plan.

I am happy to go into floorspace figures tomorrow, and I understand that other authorities may not be in the same position as Wealden but it is necessary for me to protect emerging evidence bases for the Wealden Local Plan.

Regards

[Redacted]
lower unemployment and net out-commuting in getting to where we are. On the plus side, these figures only relate to projects, so should exclude jobs created without interventions.

As Marina said, there is a risk of the Strategy figures for jobs on certain sites (notably NE Rother) being used to undermine employment allocations elsewhere on the grounds that they are not needed to secure the necessary jobs. I accept this would take a determined agent/developer to get to the bottom of things, but it is a risk.

Rother District Council
Town Hall
Bexhill on Sea
East Sussex
TN39 3JX

www.rother.gov.uk

From: *********** ESCC
Sent: 09 December 2014 10:46
To: *********** RDC, WDC
Subject: FW: East Sussex Growth Strategy - Growth Indicators Rationale

Hi *********** RDC, WDC

Following your concerns about figures in the Growth Strategy see email below which has the additional jobs figure in. *********** made the additional point that this is a growth measure and not a target. It is not sub divided and would be achieved through a range of measures not just additional homes e.g. reducing the level of unemployment

The housing figure in some places is still 1,370 but this has been changed to 1504.

Hope this puts your minds at ease.

Regards,

*********** ESCC

From: *********** ESCC
Sent: 09 December 2014 10:27
To: *********** ESCC
Subject: FW: East Sussex Growth Strategy - Growth Indicators Rationale

*********** ESCC
He is right that they are but they are predicated on the LGF project job objectives checked back to the forecast jobs – the actual job number is as below:

**Growth Measures**

1. To achieve our vision by 2020 we have identified the following indicators that encapsulate our aspirations for the East Sussex economy. If we achieve the growth measures that we have set ourselves below, we can be confident that our economy is moving in the right direction in terms of closing the GVA gap and creating jobs at a faster rate.

- **Support the creation of 12,000 additional jobs in East Sussex by 2020**
- Contribute to unlocking key employment floor space allocated in local plans
- Achieve average annual housing completions of 1,370 in East Sussex to 2020, in accordance with our Local Plans
- Increase GVA per capita increase by 20% by 2020
- Maintain the employment rate for East Sussex at a higher level than the England rate to 2020
- Maintain the JSA claimant rate for East Sussex at below the England rate to 2020
- Increase the percentage of working age residents in East Sussex with a level 4 (degree) qualification to at least 35% by 2020

I also attach the rationale behind the Growth measures which you can share with the ESCC. The actual amount of 12,000 is less than forecast to be facilitated via LGF (see rationale).

---

**From:** sharedintelligence

**Sent:** 08 December 2014 10:58

**To:** ESCC, ESCC, ESCC

**Subject:** East Sussex Growth Strategy - Growth Indicators Rationale

Hi ESCC

Please see attached our report setting out the rationale for the growth indicator 'targets' that we have in the Growth Strategy. As you will see, further checking of the housing numbers from the local plans has unfortunately revealed errors in the number (1370) we have in the latest draft - this should be 1504 houses per annum. (We will change this in the final version of the report which will also have in the foreword and images.) In the meantime, however, we would appreciate if you could check with the districts that the number we have used are the most up-to-date (we got the plans off their websites) and that they are comfortable with the averages we have used to come up with the East Sussex figure. I have pasted the relevant section from the rationale report for ease below.

[http://archivemanager.wealden.gov.uk/app.html#/message/d908209e-eed5-ff3b-e45d-be0c031d8da5/[20/12/2018 16:43:57]]
We will look at the foreword that he sent through over the weekend and get back to you on this today.

Regards

sharedintelligence

- Achieve average annual housing completions of 1,370 in East Sussex to 2020, in accordance with our Local Plans

Source: District and borough Local Plans and Core Strategies

<table>
<thead>
<tr>
<th>Local Plan/Core Strategy</th>
<th>Plan Period</th>
<th>Housing target</th>
<th>Average annual completions</th>
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<tr>
<td>Eastbourne Core Strategy</td>
<td>2006-2027 21</td>
<td>5022</td>
<td>239</td>
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<tr>
<td>Hastings Local Plan: The Hasting Planning Strategy</td>
<td>2011-2028 17</td>
<td>3400</td>
<td>200</td>
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<tr>
<td>Rother Core Strategy adopted 2014</td>
<td>2011-2028 17</td>
<td>5700</td>
<td>335</td>
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<td>Wealden Core Strategy Local Plan adopted Feb 2013</td>
<td>2006-2027 21</td>
<td>9440</td>
<td>450</td>
</tr>
<tr>
<td>Lewes District Local Plan - Joint Core Strategy - submission document</td>
<td>2010-2030 20</td>
<td>5600</td>
<td>280</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td></td>
<td><strong>1504 per annum</strong></td>
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</tbody>
</table>

**Rationale**

Ensuring that there is a good supply of quality homes across a range of different types and tenure is important for the future growth of the East Sussex economy. This was recognised in the LGA Peer Review which advocated 'a joined-up approach to housing and economic growth' and recognised that housing is an essential component of economic growth.

Across all the East Sussex district local plans in the 2014-2020 period of the Growth Strategy, the aggregated average number of houses to be delivered annually is 1504.

http://archivemanager.wealden.gov.uk/app.htm/#/message/d908209e-cod6-4ffeb-e45d-be0c031d8da5/[20/12/2018 16:43:57]
Hi ESCC

Please see the revised final draft of the East Sussex Growth Strategy in which I have tried to take on board all the comments received and maintained consistency throughout.

I did not receive any feedback about any additional graphics to add in section 2 so I have put in some more as a thought fit. I haven't added a foreword yet as I noted to not receive anything, nor any images yet, as this would make the document very large in terms of mb.

As you will see I have also attached a draft action plan which formalises the indicative actions at the end of each section and puts into a relevant template. I will now work on the note justifying the targets and send this later on today. I know that you wanted to circulate this to TES so have sent this first.

I hope this covers everything off.

Kind regards

sharedintelligence

Shared Intelligence Limited is a company registered in England and Wales no. 3943980
Registered Office: 1 Naoroji Street, London WC1X 0GB

This message is intended for the use of the addressee only and may
RE: East Sussex and SDNP GTAA - revised transit need

Sent: 15 December 2014 17:08

From: WDC

To: HBC, RDC, Salford University

CC: ESCC, LDC, SDNP, EBC

Note: Attachments may contain viruses that are harmful to your computer. Attachments may not display correctly.

4 Attachments

Less

Salford University

I would concur with the comments from [redacted] and [redacted] including comments in relation to the nature of the data which is currently available and in relation to taking into account the capacity at Bridies Tan. I also think that [redacted] comments on conclusions are very helpful. I would also be happy to consider/discuss others views as this is a very complex area – I tried phoning earlier but I don’t think that you were in the office today.

Kind regards,

WDC

My regular working days are Monday, Tuesday and Wednesday

From: HBC

Sent: 15 December 2014 16:38

To: RDC, Salford University

CC: WDC, ESCC, LDC, SDNP, EBC

http://archivemanager.wealden.gov.uk/app.html#message/d8ef1e3b-25f6-80a2-497c-84e9d61e2d2a[20/12/2018 16:47:25]
RE: East Sussex and SDNP GTAA - Final report for signing off

Sent: 12 January 2015 10:54
From: WDC
To: RDC, Salford University
CC: SDNP, HBC, LDC, EBC

Note: Attachments may contain viruses that are harmful to your computer. Attachments may not display correctly.

4 Attachments
image001.jpg (2 KB); image002.jpg (3 KB); image003.jpg (5 KB); Image004.png (11 KB);

Salford University
TDC

Just to confirm that I concur with [redacted] view.

Kind regards,
WDC

My regular working days are Monday, Tuesday and Wednesday

From: RDC
Sent: 12 January 2015 10:33
To: Salford University
Cc: SDNP, HBC, WDC, ESCC, LDC, LDC, EBC

Subject: RE: East Sussex and SDNP GTAA - Final report for signing off

Salford University
Thanks for reviewing the report and I’m happy that it reflects the comments we made.

Regards,

RDC

Hi all

I have had responses from the majority of authorities signing off the version of the report that I circulated on Thursday last week.

For those authorities who haven’t yet responded, I would be really grateful if you could review the minor changes that were made and let me know that you are happy to be issued the final report. Please can you respond by the end of today as some authorities need the report ASAP.

Best wishes

SDNP, HBC, RDC, WDC, ESCC, LDC, EBC

Hi all,

Thank you for responding so promptly and for agreeing a way forward for the report. As promised, have amended the report in line with discussions and have attached the final version for approval/sign off. For ease of reference, the new/amended text is highlighted in yellow and can be found on pages 63, 110, 113, 114 and 117. I have also added an executive summary at page 7.

I would be grateful if you could all review these final minor amendments and email your approval by the end of tomorrow (Friday 5th).

We are arranging for it to be proof read and formatted by our qualified external proof reader/editor. This should enable us to issue a final version (in Word and PDF) towards the end of next week. I recognise that some authorities may require the findings at the beginning of next week; however, given the level of discussion we have had in relation to this report, but also the number of amendments that have been made, we are not comfortable issuing the final version without it being proofed. The findings will not change in any way, so authorities will be able to use the data in the report as it stands. This is just a QA process to check for any typos, etc. However, I will need all authorities to sign off by the end of tomorrow for our proof reader to be able to provide a final version next week.

Kind regards

Salford University

From: [redacted]  SDNP
Sent: 07 January 2015 12:47
To: [redacted]  HBC, Salford University, RDC, WDC, ESCC, LDC, EBC

Subject: RE: East Sussex and SDNP GTAA - revised transit need

Hi Salford University

Yes, happy with this approach.

Kind regards

SDNP

From: [redacted]  HBC
Sent: 07 January 2015 12:01
To: [redacted]  Salford University, RDC, WDC, ESCC, LDC, SDNP, EBC

Subject: RE: East Sussex and SDNP GTAA - revised transit need

Salford University

I'm pleased to confirm that we are happy to proceed on this basis.

Kind regards

HBC

From: [redacted]  Salford University
Sent: 06 January 2015 15:14
To: [redacted]  RDC, WDC, HBC, ESCC, LDC, SDNP, EBC

Subject: RE: East Sussex and SDNP GTAA - revised transit need

RE: URGENT FW: Bin storage, etc.

Sent: 1 May 2015 16:27
From: [Redacted]
To: [Redacted] RDC
CC: [Redacted]

Note: Attachments may contain viruses that are harmful to your computer. Attachments may not display correctly.

2 Attachments

image001.jpg (12 KB); RT: Bin storage, etc. (103 KB);

Hello I've had the attached back from the waste manager at WDC.

Eastbourne have confirmed they don't have any documentation and I haven't had a response from Hastings yet.

If it's ok with you, I'll collate the RDC, WDC and HBC advice/info into one document on behalf of all four councils in the joint waste contract and provide it for you next week. OR if this is something you'd rather do yourselves just let me know but please include Hastings too.

Thanks,
[Redacted]
Fyi – (WDC policy) has forwarded the attached – see email thread. This seems good timing (especially for ).

I would suggest we give urgent feedback and also talk to WDC about jointly issuing if agreeable and cross-referencing in any policy.

Thanks,

RDC

For your information.

WDC

Hi WDC

We have had a few minor issues with some of the new bin stores but they are mostly construction problems rather than design e.g. doors not opening enough to allow bins to be moved easily. The most common problem is poorly parked cars, particularly on bends, which prevent access for our collection vehicles.

from my team has been responding on planning consultations and this has been very helpful to avoid issues that may have arisen. I would also say the Planning officers have been great in resolving any issues we raise.
Dear All,

Please see the agenda for the meeting on 1st April. I’ve gone through the areas which I think are useful points for discussion at the meeting.

The second page of the agenda includes pdf’s of recently adopted/published drafts of affordable housing SPDs which I thought might be relevant/good discussion points for the meeting. I appreciate there are a lot, so I’ve included the page references relating to the approaches to financial contributions so you don’t have to read the entire SPD, but it would be good if you could familiarise yourself with some of the differing approaches that are being used.

If you wish to add anything else to the agenda please let me know and I can add it.

See everyone next Wednesday.

Kind regards

RDC

Planning Strategy
Rother District Council
Town Hall
Bexhill-on-Sea

Affordable Housing – Financial Contributions

10.00am Wednesday 1st April 2015
Wealden District Council, Vicarage Lane, Hallsham, BN27 2AX
Room – Mt Rm 6

 Attendees: RDC (RDC – Planning), RDC (RDC – Planning), RDC (RDC – Housing), WDC (WDC – Planning), WDC (WDC – Planning), WDC (WDC – Housing), WDC (WDC – Housing).

AGENDA

1. Overview of policy:
   a) Existing local Affordable Housing policies:
      i. RDC (Policy LHN2);
      ii. WDC (Policy WCS8 Affordable Housing)
   b) Planning Practice Guidance (PPG)
      i. RDC response to the PPG (Cabinet Report)

2. Existing approaches to implementation/collecting financial contributions:
   a) RDC
      i. In lieu of affordable housing
      ii. Financial contributions policy
   b) WDC

3. Working towards implementation of local policy:
   a) RDC – Review of LHN2 through the Development and Site Allocations Plan & updated SPD
   b) WDC – Review of WCS8 through the Affordable Housing Delivery Local Plan
   c) Respective timetables for implementation

4. Approaches to calculating financial contributions/methodology’s
   i. Affordable housing assumptions in the respective CIL evidence bases
   ii. Recently adopted/consulted upon SPD examples (see table below)

5. Scoping of evidence base requirements inc. parameters of a consultants brief for viability work

6. Summary of action points

7. AOB

8. Date and time of next meeting

P.T.C

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-----Original Message-----
From: WDC
Sent: 15 March 2016 17:28
To: RDC
Subject: RE: Catch-up

Hi RDC

I don’t have any meetings after the meeting so I am free to catch up.

WDC

From: RDC
Sent: 15 March 2016 17:15
To: WDC
Subject: Catch-up

Hi WDC

Hi. I am hoping to have some time to catch up with you about several things – perhaps we can do this tomorrow after the T Wells event if time allows?

I want to mention:
- The High Weald fields study
- Dark skies
- AONB policy
- Devolution asks
- Self-build register questions

RDC

Strategy & Planning Service
Rother District Council
FW: Unauthorised Encampment Report

Sent: 29 May 2015 13:43
From: RDC
To: WDC, WDC, ESCC
CC:

In light of [REDACTED] comments, I thought I should forward them to you in case you had any comments, as I am inclined to raise it at Local Plan Managers' meeting next week.

Thanks,

RDC

Rother District Council
Town Hall
Bexhill on Sea
East Sussex
TN39 3JX

________________________________________________________

From: RDC
Sent: 29 May 2015 11:53
To: RDC
Cc: ESCCC
Subject: RE: Unauthorised Encampment Report

I have spoken to [REDACTED] about this unauthorised encampment report but I'm unclear about validity of the data and how the data is reported to you.

I was under the impression that the data to be recorded as part of this report would be agreed across the County with sign up from the respective Environmental Health, Housing and Planning departments at

http://archivemanager.westden.gov.uk/app/html/#message/76f77a6-9211-1e170-3a2d-251c47164f70/2012/18/16:12:31

RDC17
each Council. As far as I'm aware this has not been done. I'm keen to ensure that the data recorded correctly reflects what is recommended through the joint countywide work on future need for transit provision, particularly as one of the criticisms was consistency of data recording for unauthorised encampment data. Therefore I think there needs to be a discussion with the respective departments at each of the Council's as to whether this report satisfies their requirements as well as meeting the recommendations of the countywide work.

In terms of the validity of the data recorded, if we don't know the ethnicity of those recorded on the report, then we can't be certain that these people are actually Gypsies or Travellers under the NPPF definition. Whilst I appreciate that you would need to record them in the report, it may be that these records need to be treated with caution, particularly as it forms part of the new dataset for recording of unauthorised encampments as recommended by the countywide transit report.

I'm also not clear how the data is reported to the Traveller Team, would it be possible to clarify? Is it a particular persons responsibility or do you rely on reporting from the public? The reporting methods need to be clearly set out and transparent as we will be relying on this dataset to underpin the need for any new transit sites within the County.

Given that it was a recommendation of the countywide work, I suggest that this issue is discussed at Local Plan Managers to give a steer to the content of the report and to order to achieve countywide sign up.

Many thanks

RDC

Planning Strategy
Rother District Council
Town Hall
Bexhill-on-Sea
East Sussex
TN39 3JX

From: ESCC
Sent: 20 May 2015 09:03
To: RDC
Cc: RDC
Subject: RE: Unauthorised Encampment Report

Hi RDC
Archive Manager

this OK with you?

Best wishes,

[Redacted] WDC

[Redacted] Environment and Community Services
Wealden District Council | Council Offices | Vicarage Lane | Hailsham | East Sussex | BN27 2AX

From: [Redacted] RDC
Sent: 21 April 2015 12:57
To: [Redacted]
Cc: [Redacted] WDC, WDC, HBC, WDC
Subject: RE: Wealden Local Plan

[Redacted] WDC

Of course, happy to meet up and discuss a practical way forward for us.

I should perhaps reiterate the point that I made at the one meeting we had with your consultants (and T Wells representative also made), namely that they showed an "area of influence" on Wealden, but not a HMA as such. I think that the work done for T Wells/Sevenoaks confirms what I regard as a more robust approach to defining HMAs (Duncan attended). If the SHMA is being concluded on the original basis, then I must, at best, reserve our position on it.

In tune with the T Wells approach (if not their detailed boundary), our view is that the approach taken in the Hastings and Rother SHMA is appropriate. Hence, on the assumption that you will be meeting each LPA in the County, it may be best to meet RDC and HBC together (hence cc’ing [Redacted] HBC

I have my main holiday in June this year, so off w/b 15/6 and 22/6, otherwise fairly uncommitted.

Regards,

[Redacted] RDC

[Redacted] Rother District Council
Town Hall
Bexhill on Sea
East Sussex
TN39 3JX

[Redacted] [Redacted] [Redacted]
From: WDC
Sent: 21 April 2015 08:42
To: RDC
Cc: WDC
Subject: Wealden Local Plan

Dear RDC,

As you are aware that Wealden is preparing a new local plan to review the adopted Core Strategy and combine this with the Delivery and Site Allocation Plan. It is our intention to consult on an Issues and Options paper in October this year in line with our Local Development Scheme. We are currently finalising our Strategic Housing Market Assessment with our consultants and would like the opportunity of discussing the outcomes of this report and the direction of the Issues and Options Paper before we finalise the document for consultation. It is our intention to put together a paper to inform the discussion to provide you with the background to the document and the issues that Wealden face, especially in relation to housing numbers and the Duty to Co Operate.

If possible and I would like to meet with you in June to help inform the preparation of the document at an early stage therefore if you could suggest some convenient dates and times I would be grateful. It is our intention to provide you with the background paper towards the end of May once the work has concluded on the SHMA.

Thank you in advance.

WDC

Environment and Community Services
Wealden District Council | Council Offices | Vicarage Lane | Hailsham | East Sussex | BN27 2AX
Web: www.wealden.gov.uk/planningpolicy

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Wealden District Council

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http://archivemanager.wealden.gov.uk/app.html?/message/e4fdd198-b351-829b-76cb-c4171a40ce59[20/12/2018 16:17:38]
Following our meeting on 3rd June please find attached the notes from the meeting for your comments and approval.

RDC – if you could forward on your comments/ evidence relating to Rother’s inclusion in our housing market area we would be grateful.
WEALDEN DISTRICT COUNCIL

Wealden Local Plan Duty to Operate

Wednesday 3rd June 2015 - 2.00 p.m. to 4.30 p.m.

Rother District Council offices, Bexhill

Notes from meeting

Present:
- [Name] (WDC) - [Signature]
- [Name] (WDC) - [Signature]
- [Name] (RDC) - [Signature]
- [Name] (HBC) - [Signature]

WDC opened the meeting and outlined WDC current Local Plan status and the timetable for the preparation of the Wealden Local Plan. The first stage being consultation on an Issues, Options and Recommendations document in October and November this year. The anticipated date for adoption is winter 2018. This document will be an all encompassing Local Plan, including the Core Strategy Review.

WDC confirmed that this meeting was confidential.

**Strategic Housing Market Assessment (SHMA)**

WDC confirmed that WDC had received this week a final draft of the SHMA. One of the purposes of the meeting is to discuss the SHMA. It is the intention of the Council to incorporate discussions and views of other Local Authorities to be included in the SHMA papers to show the interactions of Local Authorities and the SHMA process in order to comply with the duty to cooperate. One new amendment was the inclusion of HBC within the Housing Market Area (HMA) and this will be questioned when commenting on the draft with the consultants. WDC would welcome HBC comments on this. WDC acknowledged that the report sets out there was a marginal relationship with HBC but this was less than for Brighton and Hove and therefore HBC should be removed from the HMA.

WDC confirmed that initial estimations indicated that the current housing shortfall of other adjoining authorities (Lewes, Rother, Eastbourne, Hastings and Tunbridge Wells) is approximately 20,000 dwellings. It was acknowledged that this estimate is based on plans with different timescales anticipated for the Wealden Local Plan. As part of the duty to cooperate meetings this figure
will be investigated, as it is based on assumptions made by WDC. WDC confirmed that Eastbourne and Tunbridge Wells need to clarify their need. WDC needs to show that it has looked at accommodating this level of growth in addition to the identified need for WDC. RDC confirmed that RDC unmet need was 480 dwellings up to 2028 and RDC confirmed that HBC need was 3,463 dwellings over the period 2011 to 20281. HBC

WDC confirmed that it is anticipated that waste water treatment works issue in the south of the district will be resolved in the medium to long term of the plan period therefore it does not currently appear that development in the south of the district will be not constrained in the future. However this will be subject to further detailed information from Southern Water.

The draft report indicates WDC has a need, in addition to the adopted Core Strategy housing numbers, of approx. 10,000 dwellings over the period from 2013-2037 and approx. 7,500 dwellings for the period 2013-2033. These figures are a high prediction based on the economic growth forecast in the report. WDC queried the use of a high economic growth forecast given that East Sussex generally has a slower rate of growth than the rest of the region. WDC acknowledged that there may be further discussions with adjoining authorities on whether the high economic forecast is appropriate in the area.

RDC confirmed that most of RDC’s unmet need can be seen as relating to areas from where the district has high net in-migration. This is predominantly from London and adjoining areas. Therefore, he was not sure whether more housing in Wealden would impact on this need.

RDC disagreed with current version of the SHMA that shows that RDC is within the HMA. RDC believes that WDC has strongest links with Tunbridge Wells and Eastbourne, referring to the recent work on the Tunbridge Wells and Sevenoaks SHMA and with the earlier Eastbourne and South Wealden HMA.

WDC confirmed that WDC would query why HBC is now within the HMA and that we can report that RDC does not believe that they are in the HMA as well. RDC was provided with the draft chapter of the SHMA regarding the housing market are and confirmed RDC would make comments and provide evidence to support RDC view.

Spatial development options

WDC produced three maps showing options for development locations. These maps were based on the 2013 to 2037 data. The maps showed a distribution of housing based on a range of housing including:

1. A proportional split between settlements;

---

1 i.e. these are the differences between the respective objectively assessed needs and local plan minimum targets; in the case of Hastings the OAN is 6,863 or a net annual average of 404 up to 2028, whereas the now adopted Planning Strategy target is for at least 3,400 or an annual average of 200 net new units up to 2028; for Rother, the OAN is 6,180 dwellings with a Core Strategy target of at least 5,700 dwellings over the same time period.
2. New towns or significant urban extensions (approx. 5000 dwellings) and a proportional split between settlements;
3. Development in locations not affected by the Ashdown Forest.

WDC confirmed that the first two options did not take into account known constraints and that based on experience WDC needs to show that we have looked at new settlements and large urban extensions.

WDC confirmed that option three is the most reasonable option at this stage given the need to keep development away from the Ashdown Forest, however it is likely that any significant development concentrated in the south of the District would require improvements to the A27.

HBC asked whether we have translated the employment projections into floorspace requirements. confirmed that this work is currently ongoing and will continue throughout the year. In general terms, the district is becoming more prosperous in this area and that we have been contacted by potential investors about development in the district.

RDC asked why WDC are not looking at Uckfield or Crowborough and confirmed that this is due to the Ashdown Forest.

WDC asked how RDC and HBC feel about putting the majority of development in the south of the district.

RDC understood this from an Ashdown Forest and High Weald AONB perspective. He understood that, while there are travel to work flows between Rother and south Wealden, this relationship is not strong. The impact on the Pevensey Levels needs to be considered in terms of waste water treatment and run off. The flow of traffic through Polegate to the A27 is a concern due to Rother’s links to Brighton & Hove and Lewes.

RDC confirmed that significant development is expected to be taking place on the northern edge of Bexhill and that a new road to access this and connect to the new Link Road is at the design stage (this is confidential). Having additional development in the Ninfield area would not be an issue for Rother, in principle.

RDC confirmed that there are traffic capacity issues coming into Bexhill from the west and this is likely to become worse given the additional development taking place in this area in RDC. This is subject to ongoing assessment, but would be a greater issue if further substantial further growth were planned in south Wealden.

RDC wanted to ensure that development was sympathetic to the AONB designation.

Non residential development
RDC confirmed that RDC is meeting all its employment needs. RDC are currently undertaking an employment sites review. They have received LEP money for new employment development in Bexhill around the Link Road. In Battle, there are no real opportunities for retail development so there is unmet need. There are also limited opportunities for further employment sites. In Bexhill, there is no scope for town centre retail growth and an edge of centre development has currently stalled. They do expect to meet local need. RDC retail review indicates there is 80% trade retention and they are looking to increase this to 90%.

RDC confirmed that the main infrastructure issue for Bexhill is road capacity. The HS1 proposal will impact RDC but they are unsure of the timescale or the implications on growth in the region.

Other

WDC confirmed that WDC would send through the notes of the meeting to RDC and for approval and a full scoping report would follow outlining the issues for comment.

WDC confirmed that the information provided from this meeting would input into the Wealden Local Plan preparation.

WDC confirmed that WDC would feedback comments on the SHMA to the consultants and that we would take into account any comments received.
RE: Commuted Sums Methodology

Sent: 24 July 2015 10:28
From: [redacted]
To: [redacted]
CC: [redacted]

This is really helpful thanks very much for taking the time to make these enquiries.

Very interesting to hear that Horsham's commuted sums have become negotiations site by site, that varies so much - regardless of their robust looking methodology. This does seem to suggest that the expectations over what contributions could be realistically achieved were set to high to begin with.

From: [redacted]
Sent: 23 July 2015 15:00
To: [redacted]
Cc: [redacted]
Subject: RE: Commuted Sums Methodology

Hi [redacted]

I spoke to [redacted] at Horsham DC on the phone on 4th June, and detail below an outline of the conversation –

I have spoken to [redacted] at Horsham DC on the phone on 4th June, and detail below an outline of the conversation – Unfortunately it seems they are no further advanced than us – they currently negotiate on a site by site basis (based on the 40% of OMV) but he admitted it is far from scientific and a bit on the “back of a fag packet” as to what is finally agreed. Therefore the amounts agreed vary quite a lot.

Where there is difficulty agreeing an amount, they refer it to their consultant – Dixon Searle Partnership – who will then take up the negotiations on their behalf. This is because it is difficult to establish OMV sometimes, and viability gets thrown in, and [redacted] has found the DV do not understand valuations of affordable housing so don’t use them.

[redacted] said that Dixon Searle are currently looking at the commuted sums methodology on their behalf, which should be in the new Development Framework due to be adopted at the end of this year.

[redacted] said that they use the sums district wide as they don't want to be tied to the impracticalities of having to use the money within that parish.

http://archivemanager.wealden.gov.uk/app.html#/message/6d023e2d-37b3-521e-1945-86b0b7c4ff1c/[20/12/2018 16:11:07]
I then rang [REDACTED] who seemed to think the work for Horsham was "on pause" so not sure what that means...

He did say they could do consultancy work on our behalf, natch, and that they have done a similar thing for Chiltern DC so I will have a look at theirs...that is based on being more of an evidence document £1 per m2 to tie in with CIL. He added it was probably best to publish assumptions to guide expectations.

I have asked for a meeting with [REDACTED] so that I can get more info re how they assessed the 40% of OMV etc, and will keep you posted.

[REDACTED]

Wealden District Council
[REDACTED]
www.wealden.gov.uk

---

From: [REDACTED]
Sent: 15 July 2015 15:19
To: [REDACTED]
Subject: RE: Commuted Sums Methodology

Hi All,

I'm just following up on the action points from our last meeting on 26th May and wondered if those noted below could update progress against the actions.

RDC — share draft model S106 with [REDACTED] at Wealden – shared by [REDACTED] Comments to be collated for next meeting.

RDC — to chase up Richmond regarding their viability work to underpin their commuted sums methodology (they require higher affordable housing %ages on employment sites that move to housing) – Richmond confirmed that they didn’t rely on additional viability work but used previous work they had commissioned to support their Core Strategy and Development Management Plan.

WDC — arrange meeting with Horsham to discuss their commuted sum collection rate and feedback to working group

WDC — to send round draft SPD headings/structure to the group.

It would be useful the points above are actioned so that we can seek to set up a follow-up meeting to discuss the above and agree a potential way forward with this work and any subsequent viability work that may/will need to be commissioned.

Many thanks

http://archivemanager.wealden.gov.uk/app.html#/message/6d023c2d-37b3-521e-1945-86b0b704f10c/[20/12/2018 16:11:07]
RE: East Sussex Local Plan Manager Group - 30.7.15

Sent: 29 July 2015 11:58
From: RDC
To: EBC, ESCC, LDC, RDC, WDC, BHCC, EBC, HBC, SDNP
CC: ESCC, LDC

Note: Attachments may contain viruses that are harmful to your computer. Attachments may not display correctly.

Dear All,

In respect of item 7 – Duty to Cooperate – Gypsy and Traveller Monitoring – Draft MoU, I attach the Draft Memorandum of Understanding following on from the meeting in June 2015 to discuss the scope and consistency of monitoring of unauthorised encampments across the County.

You may recall that in the last LP Managers Group, the issue of evidence relating to the need for transit sites as a result of the recent GTAA had highlighted issues relating to the consistency of Unauthorised Encampment monitoring across the County. As a result a meeting was arranged in June to discuss how such information should be consistently recorded taking on board the issues highlighted in the GTAA. As an outcome of this meeting it was suggested that for the purposes of Duty to Cooperate a MoU would be drafted detailing the scope of the performance monitoring to demonstrate how the Authorities have cooperated to improve the data collection. The Draft MoU details the background to the MoU, the data to be collected on the report and that ESCC Traveller Team will administer its data collection. It also details each Council’s main contact regarding unauthorised encampments and that a six-month review will be undertaken in January 2016 to check that the report is working appropriately. I

Unfortunately I cannot attend the meeting tomorrow, but [Redacted] will be able to discuss the Draft MoU with the group, but am happy to discuss the document with anyone as necessary. What I hope can happen is that the MoU can be taken away for discussion at each of the Authorities with a view to feeding back to me before the September meeting so that the MoU for the purposes of DTC can be signed off on the
30th September LP Manager meeting.

Many thanks

RDC

EBC

ESCC, LDC, RDC, WDC, BHCC, EBC, HBC, RDC, SDNP

Town Hall
Bexhill-on-Sea
East Sussex
TN39 3JX

EBC

From: [Redacted]
Sent: 24 July 2015 12:17
To: [Redacted]
Cc: [Redacted]
Subject: RE: East Sussex Local Plan Manager Group - 30.7.15

Hi,

Please note that the meeting on 24th November in Eastbourne will now take place in Meeting Room 1 at the Town Hall.

Kind regards,

EBC

From: [Redacted]
Sent: 24 July 2015 09:16
To: [Redacted]
Cc: [Redacted]
Subject: RE: East Sussex Local Plan Manager Group - 30.7.15

Dear All,

http://archivemanager.wealden.gov.uk/app/html/#/message/1144c2b5-1890-0a45-f564-595f14a3deb8/[20/12/2018 16:09:25]
RE: Unauthorised Encampment Report - September 2015

Sent: 6 October 2015 15:20
From: RDC
To: ESCC
CC: RDC, WDC, HBC, WDC, LDC, SDNP, HBC, ESCC, ESCC, LDC, EBC

Thank you for your prompt response.

Much appreciated.

Kind regards

RDC

Sent: 06 October 2015 15:20
From: ESCC
To: RDC
CC: RDC, WDC, HBC, WDC, LDC, SDNP, HBC, ESCC, ESCC, LDC, EBC
Subject: Re: Unauthorised Encampment Report - September 2015

Hi all. All changed from now on. This is the last report in the old style. Fields now added. Thank you.

From: RDC
Sent: Tuesday, October 06, 2015 02:34 PM
To: ESCC
CC: RDC, WDC, HBC, WDC, LDC, SDNP, HBC, ESCC, ESCC, LDC, EBC
Subject: RE: Unauthorised Encampment Report - September 2015

In light of circulation with regards to the Unauthorised Encampments (UEs) report for September

http://archivemanager.wealden.gov.uk/app.html#message/5d62ba?d-c508-2b48-8b4b-bb5235ad4c49/20/12/2018 16:06:03

RDC30
and our discussion at the Local Plan Managers meeting about the recently agreed Memorandum of Understanding regarding UEs (attached), I'm concerned that not all the agreed fields in the table in the MoU are contained in the UE report and that the agreed data is therefore unlikely to be captured when reporting UE's. I notice that the following fields are missing from the report:

<table>
<thead>
<tr>
<th>Breakdown of number of Adults &amp; number of children (under 18)</th>
<th>Reason for travelling i.e. seasonal work, seeing family</th>
</tr>
</thead>
<tbody>
<tr>
<td>Who reported the UE</td>
<td>Who verified the data onsite</td>
</tr>
</tbody>
</table>

Whilst I understand your concerns relating to being able to obtain all this data when attending the sites, I am concerned that if those fields are not contained in the report and/or the data capture sheets used onsite, we will never be able to try and get capture that data. Therefore not giving a proper chance in trying to rectify the criticisms contained within the recently updated GTAA about how the data on UE's is recorded across the study area. Could you please amend the report structure to include those fields, so we are able to obtain this data?

Kind regards

RDC

Planning Strategy
Rother District Council
Town Hall
Bexhill-on-Sea
East Sussex
TN39 3JX

From: ESCC
Sent: 06 October 2015 09:14
To: RDC
Cc: HBC, WDC, LDC, EBC, NHS, BHCC, RDC, WDC

Subject: Unauthorised Encampment Report - September 2015

http://archivemanager.wealden.gov.uk/app.html#message/5d62ba7d-c508-2b4b-8b4b-bb5235ad4c49/20/12/2018 16:06:03
Dear All

Please find attached the Unauthorised Encampment Report for September 2015

Kind regards

ESCC
Traveller Team
Communities, Economy and Transport Department
East Sussex County Council

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RDC32
Unauthorised Encampments - Memorandum of Understanding

Contributing Authorities: Eastbourne Borough Council, East Sussex County Council, Hastings Borough Council, Lewes District Council, Rother District Council, Wealden District Council

Purpose of this Memorandum of Understanding (MoU)
To establish the approach to the data recording of Unauthorised Encampments across East Sussex to provide a consistent and robust methodology across each of the local authorities. This revised approach also allows for consideration of the existing data recording for the use of the existing countywide transit provision at Bridie's Tan.

This MoU documents this approach for the purposes of the Duty to Cooperate, under the Localism Act 2011, which places a legal duty on local planning authorities, county councils in England and public bodies to engage constructively, actively and on an ongoing basis to maximise the effectiveness of Local Plan preparation in the context of strategic cross-boundary matters.

Background
In 2013, Brighton and Hove City Council, Eastbourne Borough Council, East Sussex County Council, Hastings Borough Council, Lewes District Council, Rother District Council, South Downs National Park Authority and Wealden District Council commissioned Salford Housing and Urban Studies Unit (SHUSU) at the University of Salford to produce a Gypsy and Traveller Accommodation Needs Assessment. The primary purpose was to provide an evidence base to inform future development of planning policies through Local Plans. The Assessment considered the need for both permanent and transit pitches, with the need for permanent pitches being addressed on a District and Borough basis, whilst looking at transit need on a county/unitary authority basis. The Assessment published in January 2015.

In considering the transit need across the County, the Assessment looked at the use of the existing formal transit provision at Bridie’s Tan (in Lewes District, in the South Downs National Park) and the level of Unauthorised Encampments (UEs) within each of the local authority areas.

The Assessment looked at UE data from each of the local authorities as part of the evidence base. Whilst each local authority was able to provide data in relation to UEs in their area over the last three years, it was concluded that, at present, the monitoring of encampments was not particularly robust and there was no consistent means of recording data across each authority. As such, the report recommended that the authorities should work together to undertake a more robust and consistent approach to the monitoring of households stopping on unauthorised encampments and also existing transit provision, in order to be able to more accurately assess future transit requirements.

Agreed data to be recorded within the UE report
As a result of the recommendations in the Gypsy and Traveller Accommodation Needs Assessment, it was considered appropriate to develop a countywide, consistent approach to the monitoring of unauthorised encampments.

RDC33
In June 2015, following initial consideration by a small working group, the local authorities met to discuss what should be included within the UE report. East Sussex County Council agreed to administer the data collection report with assistance from the respective local authority providing they had details of a key contact at each one to in order to ascertain certain information about a UE when reported.

The table below\(^1\) contains the headings agreed by the local authorities to be included within the UE report to provide consistency of recording and ensure robust information is collated.

<table>
<thead>
<tr>
<th>Location</th>
<th>Family Name/s (for Traveller liaison purposes only)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Land owner</td>
<td>Ethnicity</td>
</tr>
<tr>
<td>Local Authority Area</td>
<td>Meets PPTS definition of Gypsy/Traveller (August 2015)</td>
</tr>
<tr>
<td>Date of Arrival</td>
<td>Reason for travelling i.e. seasonal work, seeing family</td>
</tr>
<tr>
<td>Date of Departure</td>
<td>Method of Eviction</td>
</tr>
<tr>
<td>Number of individuals</td>
<td>Who reported the UE</td>
</tr>
<tr>
<td>Number of Adults &amp; number of children (under 18)</td>
<td>Who verified the data onsite</td>
</tr>
<tr>
<td>Number of caravans</td>
<td>Comments/Additional information (including where the group/individuals were staying previously)</td>
</tr>
</tbody>
</table>

When a UE is reported to the Borough Council, District Council or East Sussex County Council, the information above will be used as a basis for the data recording. East Sussex County Council Traveller Liaison will record the information within the database working in conjunction with the local authority.

The report will be sent round monthly to the distribution list during the summer months and every two months during the winter months.

### Main contacts

<table>
<thead>
<tr>
<th>Council</th>
<th>Key contact (as at 1 July 2015)</th>
<th>Department</th>
</tr>
</thead>
<tbody>
<tr>
<td>Eastbourne</td>
<td>E</td>
<td>Environmental Health</td>
</tr>
<tr>
<td>East Sussex</td>
<td>E</td>
<td>Traveller Liaison</td>
</tr>
<tr>
<td>Hastings</td>
<td>H</td>
<td>Environmental Health</td>
</tr>
<tr>
<td>Lewes</td>
<td>L</td>
<td>Environmental Health</td>
</tr>
<tr>
<td>Rother</td>
<td>R</td>
<td>Environmental Health</td>
</tr>
<tr>
<td>Wealden</td>
<td>W</td>
<td>Housing</td>
</tr>
</tbody>
</table>

### 6-month review

The data collection processes and reporting method will be reviewed in 6-months (i.e. March 2016) to assess whether the report is working well and if any further modifications need to be made.

\(^1\) A copy of the data recording sheet is appended to this MoU.
As you appreciate, we have a policy - SRM2(iv) – which provides for ‘safeguarding land for the possible raising of Bewl reservoir’ to be defined through a site allocations plan.

However, subsequent to this policy (which was drawn up when Southern Water had identified raising Bewl as an option), SW has finalised its Water Resources Management Plan 2015-40, which does not include this as a scheme for the Eastern Area.

On this basis, our view is that there is no need to liaise further on such a scheme for our forthcoming ‘Development and Site Allocations (DaSA) Local Plan’. Of course, Southern Water (and South East Water) will be consultees on future plans.

As an aside, we are looking at introducing the water efficiency component of the ‘Optional Technical Housing Standards’ as a policy in our new plan.

Regards,

RDC

Rother District Council
Town Hall
Bexhill on Sea

http://archivemanager.wealden.gov.uk/app.html#message/3c1f38ed-86b7-66c5-2596-452fa36752b/20/12/2018 16:04:21

RDC35
East Sussex
TN39 3JX

From: WDC
Sent: 18 November 2015 10:02
To: TWBC, RDC, TWBC
Cc: WDC, RDC
Subject: RE: Inspector's Request - Bewl Water Raising

Dear TWBC

In response to your request, Wealden District Council does not have policies concerning safeguarding Bewl Water. We have not yet had recent detailed discussions with Southern Water/South East Water regarding issues of water supply, however these discussions are shortly to commence.

The Wealden Local Plan – Issues, Options and Recommendations identifies a preferred option for testing that safeguards water resources. Although Bewl Water is not specifically mentioned we will work with both Southern Water and South East Water to identify resources that need to be safeguarded. Any safeguarded site will require a change to the proposals map.

If you require any further information, please do not hesitate to contact me.

Kind regards

WDC

From: TWBC
Sent: 13 November 2015 10:55
To: WDC, RDC, TWBC
Cc: WDC, RDC
Subject: Inspector's Request - Bewl Water Raising
Importance: High

Dear WDC, RDC

The Inspector leading our Site Allocations DPD examination is seeking further clarification on the issue of the raising of Bewl Water. We recently received a statement from Southern Water saying that “at the current time we no longer wish to pursue the proposed safeguarding of land for the expansion of Bewl Water”. The Inspector is seeking to clarify what “at the current time” means and has written separately to Southern Water, who did not attend the hearings.

In addition, given the cross-boundary nature of this, the Inspector has also asked me to contact you to find out:

1. Do you have planning policies which safeguard land for Bewl Water expansion?

http://archivemanager.wealden.gov.uk/app.html#/message/3c1f38ae-86b7-66c5-2596-452fa3fd752b[20/12/2018 16:04:21]
2. Have you had recent discussions with Southern Water and, if so, what did they indicate to you regarding their plans for expansion?

In relation to the Inspector's first point, my understanding is that:

- Rother District Council has Core Strategy Policy SRM2 which is a general safeguarding policy and that the intention is for Rother to identify areas of land in a future Site Allocations document
- Regarding Wealden District Council, I couldn't find any mention of Bewl Water in your recent Issues, Options and Recommendations Local Plan consultation and assume that Wealden is not pursuing a safeguarding policy

I'd be very grateful if you could answer the questions above so that I can report back to the Inspector. If you could give me an answer by Friday 20 November that would be much appreciated.

Many thanks

Town Hall, Royal Tunbridge Wells, Kent, TN1 1RS

www.tunbridgewells.gov.uk

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RE: WLP

Sent: 3 December 2015 13:41
From: RDC
To: WDC

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2 Attachments
- image001.jpg (575 B);
- image002.jpg (1 KB);

Thanks. Got it.

RDC
Rother District Council
Town Hall
Bexhill on Sea
East Sussex
TN39 3JX

Tel. 01424-787635
www.rother.gov.uk

From: WDC
Sent: 03 December 2015 09:15
To: RDC
Subject: RE: WLP

Hi RDC

Para 8.48 relates to if we were to deliver the housing growth over the 20 years = 998 dpa. As we are actually delivering over 24 yrs it is 832 dpa. So if we take the total 19963 dwellings and take away 17640 dwellings (735*24= 17640) we are left with 2323 dwellings.

WDC
From: [REDACTED]  RDC
Sent: 03 December 2015 08:59
To: [REDACTED]  WDC
Subject: RE: WLP

Thank you.

I've found the reference to the under-supply element being from Eastbourne in the 'POforT 3' box on p55

Also, noted that para 8.48 refers to 263pa over OAHN, which presumed meant from other districts = 263x20 (2033-2013) = 5,260, but this obviously isn't right, as you refer to 2,300 below?

From: [REDACTED]  RDC

Rother District Council
Town Hall
Bexhill on Sea
East Sussex
TN39 3JX

From: [REDACTED]  WDC
Sent: 03 December 2015 08:32
To: [REDACTED]  RDC
Subject: WLP

Thank you.

Here is an extract from my presentation on numbers. It is the simplified version.

Proposal = 19,950 dwellings from 2013 to 2037
which is 832 dwellings per annum (including 7,200 approved and allocated under the current plan)

Results in some 12,750 dwellings in addition to what is already expected. This equals to 580 dwellings per annum.

On this basis we are accommodating 2,300 dwellings on behalf of our neighbours.

WDC

Environment and Community Services
Wealden District Council | Council Offices | Vicarage Lane | Hailsham | East Sussex | BN27 2AX

Web. [www.wealden.gov.uk/planningpolicy](http://www.wealden.gov.uk/planningpolicy)

Communities

Environment

Economy

[www.wealden.gov.uk](http://www.wealden.gov.uk)

Facebook

@wealdenDC
RE: East Sussex Local Plan Manager Group - Health Care Infrastructure - further information and URGENT request

Sent: 9 December 2015 09:13

From: WDC

To: [redacted]

CC: WDC, ESCC

Note: Attachments may contain viruses that are harmful to your computer. Attachments may not display correctly.

2 Attachments

- image001.jpg (575 B)
- image002.jpg (1 KB)

Many thanks RDC

I have passed on your details to CCG

Kind regards

WDC

Environment and Community Services
Wealden District Council | Council Offices | Vicarage Lane | Hailsham | East Sussex | BN27 2AX

Web: www.wealden.gov.uk/planningpolicy

From: RDC

Sent: 04 December 2015 16:49

To: [redacted]

Cc: WDC, ESCC

Subject: RE: East Sussex Local Plan Manager Group - Health Care Infrastructure - further information and URGENT request

WDC

Here is our information. I hope this is what is needed.

Thanks for pulling this together.
I confirm that we would welcome speaking to the Hastings and Rother CCG in relation to the preparation of our sites plan.

Regards,

[Redacted] RDC

[Redacted]

Rother District Council
Town Hall
Bexhill on Sea
East Sussex
TN39 3JX

Tel. 01424-787635
www.rother.gov.uk

From: [Redacted] WDC
Sent: 04 December 2015 11:55
To: [Redacted] LDC, RDC, EBC, EBC, HBC, EBC
Cc: [Redacted] WDC, ESCC
Subject: RE: East Sussex Local Plan Manager Group - Health Care Infrastructure - further information and URGENT request
Importance: High

Dear colleagues,

I understand that the paper I compiled on Health Care Infrastructure was circulated at the last Local Plan Managers Group.

[Redacted] and I had a meeting yesterday with [Redacted] of the High Weald, Lewes and Havens CCG and [Redacted] of the Eastbourne, Hailsham and Seaford CCG. [Redacted] also has responsibilities in relation to the Hastings and Rother CCG.

We have provided them with information regarding our Core Strategy housing growth and the recommended strategy re growth in the Wealden Local Plan Review, currently out to consultation. They found the information that we have given them very useful and asked if we could help them to get similar information and provide contacts for our neighbouring authorities.

They are very keen to speak to all of you – particularly as they are now developing an estates strategy and undertaking audits of premises. They are preparing an initial scoping report in relation to the estates strategy for discussion with the Department of Health before Christmas – information you can provide by return would be very helpful.
Archive Manager

I have prepared a rough template of the kind of information that they are looking for, which if you could complete, I will collate and send to them. In addition, what is most useful to them is to have an indication of phasing of development over 5 year periods. If you can provide this detail, it would be helpful. Please feel free to add rows etc.

I would suggest, that if – like us, you are in the process of a local plan review, that you include details of what is in your current plan and what is being proposed through the plan review.

Kind regards

[Redacted] WDC

[Redacted] Environment and Community Services
Wealden District Council | Council Offices | Vicarage Lane | Hailsham | East Sussex | BN27 2AX
[Redacted] Web: www.wealden.gov.uk/planningpolicy

Communities
Environment
Subject: RE: East Sussex and SDNP GTAA - revised transit need

Salford University

RDC

I think thoughts are very helpful here. As I think you've made clear it does seem that the heart of the problem is the very limited data available and the high degree of unknowns. But I would support in his concluding thoughts that more monitoring is needed before we can be robust about future need and therefore I do think his suggested revisions could help us move forward.

Obviously clearly happy to hear more from you on this.

Kind regards

HBC

From: [Redacted]
To: Salford University

Subject: RE: East Sussex and SDNP GTAA - revised transit need

Salford University

Thank you for putting extra work into the consideration of transit need.

My main observation/issue is that you are relying on a number of assumptions in making recommendations on numbers of pitches which, given the fact that we are only working with small numbers, are very sensitive to alternatives.

Length of stay has the greatest bearing on our respective conclusions, not least as I suggested 2 weeks average based on UEs, while you have used 12 weeks based on the maximum stay at Bridies Tan (BT). Having thought about this, I think the main points are:

1. There is some validity in saying, as you do, that the length of stay on UE's (which seems to be up to a week in most cases) cannot be relied upon as the basis for the desired, as opposed to actual, length of stay, as households will be moved on.
2. That said, we don't have any information that provides a basis for assuming those households want to stay for a full 3 months.
3. We should be collecting information on how long households on UEs want to stay in an area.
4. Having spoken with it is notable that when UEs have been required to move on, this has always been on the basis that there is space at BT.
5. Also, advises that while ESCC record occupancy levels at BT, they do not record length of stay. Aside from the households there who have lived in the area for 5-10 years, from the figures I saw, the changes in the occupancy of individual pitches each month suggested a much shorter average stay period than 3 months. Looking at these, I have based my suggested revisions on 4 weeks. Is this reasonable? I note that SU use this for 2 scenarios.
6. As a postscript, we should bear in mind that the evidence is that UEs are happening even though there is space on a designated site now not because of an absence of such space. This suggests that there will always be a residual level of UEs however many sites/pitches are provided. This is

http://archivemanager.wealden.gov.uk/app.html#/message/d8ef1e3b-25f6-80a2-497c-84c9d61e2d2a/20/12/2018 16:47:25
not to argue against meeting identified needs, but rather that there will not be clear mathematical relationship between numbers of UEs and spaces on designated transit sites.

I am pleased to see occupancy of BT taken into account, which makes it more robust, but there needs to be consistency between the residential calculation and the transit calculation. The residential need includes 2 pitches for households currently at BT. Hence, the transit need should be reduced by 2 pitches, as these are effectively freed up, relative to past occupancy levels. This can be seen in my suggested revisions.

In conclusion, I am not at all convinced that we can be robust in the conclusions on transit pitch numbers. The evidence suggests to me that any residual need is marginal if at all. In these circumstances, the logical conclusion to me is to recommend that the monitoring be stepped up, via DtC, (as suggested in my last email) and that further provision be made, possibly for a tolerated site, if shown that there is still insufficient space at BT to meet need arising from UEs.

Incidentally, I don’t think that the focus on individual districts is perhaps necessary but, in any event, should be clearly recommended against, simply because the numbers of pitches in each District is too small to accommodate the average encampment sizes mentioned at 13.6.

I hope this helps move us to a conclusion, but happy to consider/discuss others’ views.

Regards,

[Redacted]

Rother District Council
Town Hall
Bexhill on Sea
East Sussex
TN39 3JX

Salford University

From: [Redacted]
Sent: 10 December 2014 09:40
To: [Redacted] RDC, WDC, HBC, HBC, LBC, LBC, EBC, ESCC, SDNP, WDC
Subject: East Sussex and SDNP GTAA - revised transit need
Importance: High

Hi all

[Redacted] and I have discussed the recent exchanges in relation to the issue of transit provision at length, and have revised the Chapter in the report relating to transit need (please see Chapter 13). We are still adopting the methodology that we applied previously, as this is consistent with the approach we have taken in other

http://archivemanager.wealden.gov.uk/app.html#message/d8ef1e3b-25f5-80a2-497c-84c9d61e2d2a/[20/12/2118 16:47:25]
assessments. However, we have taken into consideration the data that is available on occupancy levels at Bridies Tan and have applied this to the calculations. We are aware that some authorities had queries around length of stay. As we highlight in the report, and as highlighted in my previous response to [redacted] queries, we cannot take the short length of stay on unauthorised encampments as a proxy for length of stay on transit accommodation. Encampments are insecure and people do not tend to stay long given the lack of facilities and also the threat of enforcement action. As such, we have used the conditions applied to current transit provision i.e. maximum 12 week stay. In reality, there is no way of knowing how long people will stay on transit accommodation. This brings us back to a point I raised in previous comments around trying to quantify something that is difficult to quantify. We feel that the revised chapter provides a much better reflection of the situation. As you will see, taking into account capacity/occupancy at Bridies Tan leads to a suggested additional transit need of 8 pitches across the East Sussex area. In terms of where and how this should be provided, we offer a range of scenarios but feel that this is something that authorities would need to work together to decide and address.

In addition to revisions to Chapter 13, we have also made the other amendments that were highlighted by various authorities, which were primarily points of clarification or typos.

We are conscious that some authorities are keen to have a final version of the report as soon as possible. I would therefore welcome any final comments or queries on the report by Monday 15th December.

Kind regards

[Redacted]

From: [Redacted]  
Sent: 07 November 2014 16:16  
To: [Redacted]  
Cc: [Redacted]  
Subject: RE: East Sussex and SDNP GTAA - revised report

[Redacted]

As mentioned before, I've been at an Inquiry all week and sat down and gone through the report in full today.

My main interest is in the Transit section (which is the part RDC signed up for), but I have to say that this does not ultimately move us on from where we were in terms of pitch requirements.

I understand the difficulties with the subject, but despite going through several times, I have not understood the methodology. I may be alone in this, but perhaps others have simply been happy with the lack of a clear conclusion!

Specifically, can you explain:

1. Why the numbers of caravans on UEs across the County (which total 86) is reduced down by 25% (to 48) because they occupy multiple encampments throughout the year? Surely, the point is that over the course of a year, these are the average numbers locally.

http://archive.salford.ac.uk/app.html#/message/d8ef1e3b-25f6-80a2-497c-84c9d61c2d2a[20/12/2018 16:47:25]
Archive Manager

2. Why paragraph 13.7 and 13.8 relate the transit need arising from UEs to the number of pitches at Bridies Tan (BT)?

3. Notwithstanding comments above, if BT would be sufficient with average stays of 4 weeks and given our own advice re mostly week-long stays, then I'm struggling to see why 13.10 suggests a "network" of sites, suggesting several more (which 14.7 seems to confirm)?

4. Although 13.7 refers to frequency of use, because this is not written in the context of the previous table, I'm not sure how my original point about the of use of transit pitches by multiple household is picked up?

I need to go now, but will give this further thought as to the way forward.

As an aside, I see that the current consultation is referred to in 2.11 and 2.22. I think people agreed that it should be noted, but equally that it hasn't had a bearing on this work. I do wonder if it would affect the assessment of need and not just its delivery?

Regards,

RDC

Rother District Council
Town Hall
Bexhill on Sea
East Sussex
TN39 3JX

From: Salford University
Sent: 16 October 2014 12:52
To: WDC, SDNP, HBC, HBC, LDC, LDC, RDC, EBC, ESCC, SDNP

Subject: East Sussex and SDNP GTAA - revised report
Importance: High

Hi all

I hope you're all OK. Please find attached a fully revised version of the East Sussex and SDNP GTAA. All the changes that have been made have been highlighted in yellow, for ease of reference. However, I would urge you all to read the report in full again given that it was first issued in May. We have endeavoured to respond to the individual comments that we received in relation to the report; however, there may be issues that we have missed given that our main focus has been on the residential and transit need calculations.

The main things to point out in the revised report are as follows:

- We have substantively revised the transit need section
- The new, agreed and disaggregated residential need figures have been incorporated

http://archivemanager.wealden.gov.uk/app.html#message/d8ef1e3b-25f6-80a2-497c-84c9d61e2d2a[20/12/2018 16:47:25]
· We have added reference to the new Government consultation
· We have updated the Caravan Count figures
· We have added a few more lines from stakeholder consultation, where relevant
· We have added some conclusions

The report has not been professionally proof read yet – this will be done once it has been signed off. We will also produce an exec summary and contents page once the contents are agreed.

We have sent a revised version of the Brighton & Hove and SDNP report separately to [redacted] and colleagues. This has been sent separately so as not to confuse matters or clog up people’s email with two large documents.

In terms of reading the revised report and returning any final comments – what sort of timescale suits you all? Can I
RE: Kent County Council: Local Transport Plan 4 Consultation

Sent: 17 August 2016 14:34
From: [REDACTED] RDC ESCC, HBC, HBC, RDC, WDC, WDC
To: [REDACTED] ESCC, ESCC, ESCC, ESCC
CC: [REDACTED] ESCC, ESCC, ESCC, ESCC

No, not seen. I’m sure that you know our (and no doubt others) strategic transport issues, so very happy for you to coordinate. I would appreciate a heads-up on draft comments though.

Thanks,

[REDACTED] RDC

Strategy & Planning Service
Rother District Council

Website www.rother.gov.uk

-----BEGIN PGP SIGNED MESSAGE-----

From: [REDACTED] ESCC
Sent: 15 August 2016 17:24
To: [REDACTED] HBC, RDC, RDC, WDC, WDC, ESCC, ESCC, ESCC, ESCC
Subject: FW: Kent County Council: Local Transport Plan 4 Consultation

Dear All,

Just checking whether you have received Kent’s email on the consultation regarding their Local Transport Plan 4.

I’d welcome any comments from your respective authority’s perspective and happy to co-ordinate a response on common issues if that’s helpful.

-----END PGP SIGNED MESSAGE-----
Hi RDC

Thanks for this - unless I'm mistaken there doesn't appear to be any attachment.

Thanks,
WDC

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From: RDC
Sent: 20 April 2016 09:28
To: WDC, LDC, ESCC, SDNP, EBC, HBC, WDC, RDC
Cc: WDC
Subject: RE: Gypsy and Traveller

Hi All,

I have reviewed the notes of the meeting and have a comment on suggested change – see attached. In essence, we can't go changing the minutes from LPM – we don't have authority to do so.

With regards to point (ii) – suggested wording changes to the additional questions in the UE Report –

- Can you suggest any ideal sites or areas where a new transit site /stopping place could be provided in the future? If this could be achieved? (I'm a bit weary of this question, it could be raising unrealistic expectations)
- What do you think are the most important travelling routes for Gypsy and Traveller's through East Sussex travelling?

Point (iii) – With regards to the GTAA and the change in definition of Gypsies and Travellers for planning purposes, we are satisfied that the target set through our Core Strategy is appropriate and reasonable, therefore we would not wish to undertake a new GTAA for permanent provision.

Happy to discuss as necessary.

I will be working on the draft matrix soon and will send round when drafted.

Thanks

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Hi all

I have the following points:

(i) Please find attached some very small suggested changes to the minutes of our last meeting.

(ii) Below – to get the ball rolling - are two possible questions as regards transit routes/areas of search. I’m certainly not precious about these in any way so bring on the comments/alternatives:

- Can you suggest any ideal sites or areas where a new transit site could be provided if this could be achieved?
- What do you think are the most important routes for Gypsy and Traveller travelling?

(iii) Following the issue which I raised at last week’s meeting, Wealden District Council is undertaking further work in relation to the issue of the change to the definition of Gypsies and Travellers in the new Planning Policy for Traveller Sites 2015. This change to the definition has potential implications for the recommendations in the GTAA in relation to pitch requirements. We will be contacting Salford University to clarify what further work would need to be done to update the results to take on board the new definition, especially as regards what further questions would need to be asked. We would be interested to hear from the other authorities as to any comments they may have on this and whether they would also be interested in this work and maybe working together on this? A response in relation to this...
matter would be appreciated if possible even if its only in the negative – thanks.

Please contact me if you have any questions or wish to discuss,

WDC

Wealden District Council
Planning for Transit Needs

Notes from Meeting 14 March, Lewes District Council offices

Attendees: (Leeds, Wealden), (Rother), (Eastbourne), (Hastings), (Lewes), and (ESCC).

1. Apologies (SDNPA)

2. Notes from previous meeting (8 March at Wealden DC offices)
   - altered a comment made on the previous meeting’s notes regarding the value in waiting until LPAs had UE reports using the enhanced monitoring over a longer period of time before progressing to find sites. Discussions touched upon item 3, below, and the usage of Bridies Tan.

3. Feedback from Local Plan Managers Group meeting
   - ed back from draft minutes of previous meeting that managers agreed there isn’t the evidence to show that there is a need for a further transit site now. Data from UE report should help as data is continued to be collected.

4. Visit to Bridies Tan
   - ed back to group on LDC and SDNPA’s visit to Bridies Tan (BT) confirming that it was very unlikely that additional pitches could be accommodated due to the site being tightly surrounded by the A27, Southerham Lane and the depot. Any additional pitches would also require more service blocks.

5. Feedback from last Transit Needs meeting’s action points
   - ESCC has spoken to at ESCC regarding the potential for additional pitches on site but needed to check why it wasn’t previously pursued, thought it was because of sewage infrastructure.

Comment [OML]: It is agreed that this view was expressed at the meeting but Wealden District Council is not clear that the view was agreed in any way by all Districts/Authorities. A possible alternative way to express this is that “there currently isn’t sufficient evidence to show definitively whether or not there is a need for a further transit site now”.

Comment [NW2]: This is the minute from LPM from ESCC “note the agreement that there isn’t the evidence that shows a need for a further site now, but that this should be kept under review by the working group, which will also look at appropriate site criteria should a need be subsequently identified. It should also be noted that there was comment on the use being made of Bridies Tan for non-Gypsy Traveller households, which should be picked up through the monitoring process”.

"we can’t go changing the text of the minute here – we don’t have authority to do so.

1 Adopted Planning Strategy 2014 has criteria based policy. Development Management adopted September 2015 includes a site for 2 pitches allocated to meet needs to 2028 on council owned land (now have outline pp)
several families challenging change in definition. Gypsy and Traveller community protesting in London on 21st May.

- Issue of funding of BT; services provided to D & Bs and how LAs are charged, has been passed to CP’s Head of Service who is understood to be provided a breakdown of costs. However, believes costs are distributed evenly across D& Bs.
- ESCC would be prepared to operate an additional transit site on behalf of East Sussex LAs, for a fee.
- ESCC HoS has been asked about ESCC owned land.

Salford University


LDC

WDC spoke to who considered that there was very little in the survey work that was undertaken for the GTAA that could help with looking for potential transit location(s).

LDC looked through the South East Plan work done by . There was little in the findings of work that might help. The study confirmed that the A27 was seen by those who participated in the

6. Criteria of areas of search
All East Sussex D&Bs circulated their respective criteria based planning policies.
The group noted that the different policies shared many common criteria and agreed that a matrix identifying each D&Bs criteria would be useful. This could then be taken to the next LPMG meeting to show progress.

7. Action points

ESCC
- To check with reasons for why an additional pitch at Bridies Tan was ruled out.
- To email Leeds Gate Project to everyone
- To look for any examples of how issues have been addressed elsewhere in the Country.
- CP to include information on UE report highlighting if it is the same Gypsy or Traveller family being reported.
- To amend Bridies Tan usage report to distinguish who is using the site

RDC
- To put together matrix of Gypsy and Traveller planning policy criteria
- To brief on what the Transit Needs group are doing to feedback to the next Local Plan Managers Group meeting (25 May)
- To forward email of draft wording for minutes of last LPMG meeting to CP

All Suggest suitable additional question(s) to ask UEs around their movements/ travelling routes.

8. AOB
None

9. Next meeting
Group agreed that it would wait to hear from the LPMG before it arranged the next Transit Needs meeting.

This agenda paper sets out the simple structure we have used for our internal background papers. Officers prefer they not to be circulated externally at present, as still effectively drafts.

The 'initial assessment of topics' referred to was a "call for policies" internally, which this core group of officers reviewed, considered what was/wasn't needed and any overlaps. That was then circulated as a draft list of policy areas and kept updated as a progress sheet.

I have also attached our draft policy/text for equestrian development fyi. Please treat this as confidential as it has yet to go through internal processes.

Hope these help.

Strategy & Planning Service
Rother District Council

Website www.rother.gov.uk
TOPIC-BASED POLICIES

Internal discussion - 6th March 2015

Circulation:

HBC, RDC, TDC

AGENDA

1. Introduction – RDC

2. Review of initial assessment of topics

   Key questions:
   - Are further policies needed for the topics identified? (i.e. would they add real value?)
   - Are there topics that have been missed or wrongly discounted?
   - What should be the scope of policies?
   - Would matters be more appropriately covered by an SPD?

3. Approach to the work

   Consider:
   - Why is a policy needed?
   - National policy position
   - PPG guidance
   - Core Strategy objectives and policies
   - Existing Local Plan policies and effectiveness
   - Current practice
   - Appeal decisions
   - Existing evidence studies
   - Good practice
   - Policy objectives
   - Alternative policy approaches
   - Form of policy
RE: Wealden Retail and Economy Study - duty to co-operate

Sent: 26 September 2016 17:03

From: RDC

To: Regeneris

CC: WDC

Note: Attachments may contain viruses that are harmful to your computer. Attachments may not display correctly.

3 Attachments

- image001.jpg (980 B);
- image002.jpg (928 B);
- image003.jpg (2 KB);

Regeneris

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.

WDC

As RDC 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?

http://archivemanager.wealden.gov.uk/app.html#/message/5bda0648-e3c3-4837-1bc3-9973a51972f1/[20/12/2018 14:44:40]
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,

[Redacted]
Strategy & Planning Service
Rother District Council

Website [www.rother.gov.uk](http://www.rother.gov.uk)

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From: [Redacted] Regeneris
Sent: 15 September 2016 14:23
To: [Redacted] Regeneris, WDC
Cc: [Redacted] WDC
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 [Redacted] 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 [Redacted] Regeneris

Thank you very much and best wishes.
Find out more at www.regeneris.co.uk

Read our latest:
- NEWS: Regeneris Assists DONG Energy with Successful Planning Permission for the World's Biggest Windfarm
- BLOG: Mapping the Greater London Authority's Regeneration Spend between 2008-2016
Dear Colleague

Please find attached an update setting out the latest position on the Wealden Local Plan and the anticipated revised timescales.

Any questions please come back to me.

Best regards

WDC

Wealden District Council
Wealden Local Plan Update

As partners will be aware we have been working hard to move to the next stage of the review of the Wealden Local Plan – the representation stage – as soon as is reasonably possible and have been aiming for Full Council on 23 November.

In working towards this date we always knew that a number of the studies we have commissioned, to produce our evidence bases, would be delivered to tight timescales. A number of the studies are complex and interrelated and together with the high demand nationally for the specialist skills required there was always a risk that delays to the studies would impact on our proposed timetable.

This has proved to be the case. The iterative nature of the studies means that there are areas which are not yet complete and for which we require further work. We need to complete this work to ensure we have the full picture before progressing with the next stage of the plan.

For example, one of the key pieces of evidence which is not yet complete is that relating to the impact of development on Ashdown Forest. We have been monitoring levels of nitrogen deposition on the Forest alongside receiving regular ecology reports. These, combined with traffic modelling work we are undertaking in conjunction with the County Council, will give us a comprehensive picture of what development will be possible across the district whilst continuing to protect the Ashdown Forest. As we have flagged from the start, this modelling will need to reflect highways improvements across the district and beyond, for example improvements to the A27, and is therefore a complex piece of work.

It is critical that the proposed plan is sound. Given this evidence base requires further work before it is complete we consider that the most appropriate action is to delay moving to the representation stage of the WLP process. Our aim is to get the work completed as soon as possible with a view to progressing with the representation stage in the first quarter of 2017. The option of proceeding now with incomplete information would be counter-productive and would only extend the overall timescale.

Whilst disappointing, this delay gives us an opportunity to share elements of the plan more widely as they emerge over the next few months rather than all aspects coming together immediately before publication. We anticipate that our overall timescale for the plan will still be within the 2018 target.

WDC

RDC61
Dear RDC,

Further to the meeting on 8th March 2017, we have recently received the judgement on the high court challenge to the Lewes Joint Core Strategy. The following link will take you to the judgement http://www.bailii.org/ew/cases/EWHC/Admin/2017/351.html. If you wish to meet to discuss any implications of the judgement or the content of the Wealden Local Plan please let me know.

Kind regards

WDC
RE: Ashdown Forest Transport Model

Sent: 26 January 2018 17:37
From: WDC
To: RDC
CC: HBC, WDC

Note: Attachments may contain viruses that are harmful to your computer. Attachments may not display correctly.

2 Attachments

Less

Dear RDC

Thank you for your email and your assistance in ensuring that the transport model has the correct inputs. As you will no doubt appreciate Wealden District Council is seeking to publish its Local Plan as soon as possible and this has resulted in very tight timescales in such matters as air quality modelling. However, I also understand your time constraints and the need to have an agreed figure in the model.

On the matter of the transport model, I am happy to discuss whether we can assist you in this regard.

Kind regards

WDC

From: RDC
Sent: 26 January 2018 16:55
To: WDC
Cc: WDC, HBC
Subject: RE: Ashdown Forest Transport Model

WDC

I have had a quick look at your email, but will not be able to reply properly in two days, having been tied up in meetings all day today and on leave Monday! Indeed, I am pretty well tied up all next week.

In fairness, it is an unreasonably tight deadline. Rother need to give it proper consideration, especially given its relevance to what is now a significant issue.


RDC63
We are now having to approach transport consultants on the overall Ashdown Forest issue and your question also raises the principle of combining of our MSOAs, which I should probably comment, having spoken to someone. In this regard, I would note that we have previously asked about the traffic flow justification for representations that WDC has made on applications to date and am awaiting definitive advice.

My immediate observation on your assumptions is that it is patently wrong to distribute the Rural Areas growth as you suggest, equally between what are essentially urban MSOAs and the rural ones, nor to factor in the focus for growth on Rye in the east of the District.

We obviously can look more thoroughly at the areas (which aren't very clear on the map, but we should be able to download) and identify what settlements are in what areas. You will appreciate that it is better to have more refined figures than take a broad-brush, but ultimately wrong, approach even if it takes an extra few days.

We will try and sort this out later next week, so the best we can do is undertake to respond within 10 days.

In the meantime, I have no choice but to advise that, for the above reasons, we do not accept your assumptions and, if you were to not wait for proper, timely advice, would wish this to be put on record.

Thanks.

RDC

Strategy & Planning Service
Rother District Council

Website www.rother.gov.uk

From: [redacted] WDC
Sent: 25 January 2018 16:22
To: [redacted] RDC
Cc: [redacted] WDC
Subject: Ashdown Forest Transport Model

Dear [redacted] RDC

Wealden District Council is currently re-running its transport model to help determine impacts upon Ashdown Forest SAC, Pevensey Levels SAC and Lewes Downs SAC in relation to air quality for the forthcoming publication of the Wealden Local Plan due to be published for committees in April. In the
spirit of the statement of common ground, that has yet to be finalised, I would like to confirm the housing numbers that we are using for your area.

We have taken the information you have provided for the statement of common ground as a starting point and given your adopted Local Plan period is to 2028 this does not need adapting to meet Habitat Regulations Assessment for the Wealden Local Plan because the end date of the Wealden Local Plan is the same.

Our transport model splits your area into four based on middle super output areas. We have used your local plan numbers to allocate housing numbers to these areas. The split for allocations, based on your local plan are shown in the table below:

<table>
<thead>
<tr>
<th>Area</th>
<th>Allocation</th>
<th>MSOA</th>
</tr>
</thead>
<tbody>
<tr>
<td>Bexhill</td>
<td>3100</td>
<td>R7-11</td>
</tr>
<tr>
<td>Battle</td>
<td>500</td>
<td>R6</td>
</tr>
<tr>
<td>Rye</td>
<td>400</td>
<td>R2/4/5</td>
</tr>
</tbody>
</table>

We have made two assumptions based on the allocations; one assumption is in relation to the allocation of 1670 dwellings to villages within your district. We have therefore apportioned this additional growth equally between the four middle super output areas identified in our model. The second assumption is in relation to the allocation of 250 dwellings to Hastings fringes. We have apportioned this equally between middle super output areas R7-11, R6 and R2/3/4.

The table below sets out the figures we are proposing to use in the model. I attach a plan of your area identifying the zones to assist.

<table>
<thead>
<tr>
<th>MSOA</th>
<th>Housing number</th>
</tr>
</thead>
<tbody>
<tr>
<td>Rother 001 &amp; 003 - Robertsbridge</td>
<td>417</td>
</tr>
<tr>
<td>Rother 002 &amp; 004 to 005 - Rye &amp; Winchelsea</td>
<td>900</td>
</tr>
<tr>
<td>Rother 006 - Battle</td>
<td>1001</td>
</tr>
<tr>
<td>Rother 007 to 011 - Bexhill</td>
<td>3602</td>
</tr>
</tbody>
</table>

In order to meet our timescales for the Local Plan we need to run the model the next week. I would be grateful if you could let me know close of play Monday if you have any concerns with regards to the numbers that we are proposing to use.

Kind regards,

[Redacted]

WDC

[Redacted]

Environment and Community Services

Wealden District Council | Council Offices | Vicarage Lane | Hailsham | East Sussex | BN27 2AX

Web: www.wealden.gov.uk/planningpolicy

FW: Ashdown Forest Transport Model

Sent: 29 January 2018 09:57

From: WDC

To: SDNP, TWBC, WDC, WDC, RDC, WDC

CC: 

Note: Attachments may contain viruses that are harmful to your computer. Attachments may not display correctly.

4 Attachments

- image001.jpg (66 KB);  image004.jpg (67 KB); image002.jpg (2 KB); image005.jpg (2 KB);

Dear SDNP

I see that you have been copied in by to our conversation regarding Wealden District Council’s request for confirmation as to what data we should be using to input into our transport model. A few matters have arisen in relation to this matter which appears relevant to the SoCG and may need to be dealt with in the next or subsequent iteration of the document.

Firstly the end dates of plans. As I explained to I expect a lot of plans will have different end dates and that is something we have found in the request we have recently made in relation to the verification of data. For the Wealden Local Plan our end date is 2028. Notwithstanding the Ashdown Forest and other European designated sites, we are unable to have a plan beyond 2028 owing to the fact that we will need an offline A27 post 2028 and there are a number of issues in relation to this matter which needs to be resolved including potential impact upon the SDNP. I do appreciate that other plans will currently go beyond 2028 (although I am not clear if Local Plan timescales will be revised if the 10 year timeframe is subsequently adopted by Government) and in this regard Wealden would like to consider what numbers should be used for those other Local Authorities using a longer timeframe. I expect it will be the same for the other Local Authorities if they have a longer timeframe than 2028. Another good example is Rother District who have an adopted Local Plan within 5 years, however the plan period is up to 2028 which falls short of the plan period used by others. will need correct me if I am wrong but he seemed to be concerned in his email that Wealden has a shorter term Plan date and I am quite happy to address this in the statement of common ground – although this relates to other planning matters namely the offline A27 and the location of development associated with this.

The second matter relates to distribution of dwellings. This is a matter raised through the discussion between myself and Within the Wealden model we use Middle Super Output Areas (MSOAs) for distribution within Wealden District. However in some cases these have been modified to split the areas

http://archivemanager.wealden.gov.uk/app.html#/message/88ac149c-f201-3837-b684-ccaff9dd3e9[/20/12/2018 12:14:56]
to create a more fine grain detail. As you will probably appreciate Wealden is very large and as a result some of our Middle Super Output Areas are large and to ensure a better understanding of traffic flows these have been split (this is particularly of relevance when we have the A21 and other routes to the M25). In some cases Middle Super Output Areas in other Local Authorities have been amalgamated depending on the understanding of flows by the transport modeller. To complicate matters a bit further Wealden District has recently received its new model so the appendix table relating of modelling will now be out of date to a certain extent. Wealden District is more than happy to provide the split of development within our MSOAs so that other Local Authorities can input these into their model, which includes a split in terms of windfall. However, other Local Authorities may struggle to provide reciprocal arrangements for example because some relevant Local Authorities may not know what development will go into each MSOA.

The third matter relates to time scales for the provision of data. Like SDNPA Wealden District has a very tight timescale for plan preparation. I understand that our quick turn-around time in our recent email has caused issues for some Local Authorities where the distribution information has been requested to be verified. I appreciate that this adds a burden onto already over stretched teams. Can we discuss and add to the SoCG to clarify what other LAs consider to be an appropriate timescale to respond. This will help me explain to my members and developers if it impacts upon planned timescales.

The forth matter relates to the fall-back position. If a Local Authority (1) does not provide the relevant data within the agreed timescale (above); or (2) refuses to provide data concerning distribution; or (3) is unable to provide data concerning distribution then it would be good to agree a fall-back position. This fall-back position can either be (1) Tempro (which provides assumptions on MSOA level) or (2) the Local Authority can use a distribution put together by the LA undertaking the modelling based on the agreed overall plan data (for example OAHN for a plan that is considered out of date) or (3) The OAHN is used (or any other relevant number agreed already contained within the SoCG) using the proportional distribution contained within Tempro. I would personally prefer 1 or 3 - both have advantages or disadvantages but at least it is a solution.

I appreciate that this has additional impacts upon your team in terms of preparing the SoCG and I do not wish to make the process any longer for the SDNPA, but it would appear that these issues are emerging and maybe an issue for other Local Authorities moving forward.

I have copied RDC into this email as I have specifically provided Rother District as an example. I appreciate you may also wish to send this email to the other partners so that they are aware.

Kind regards

[Redacted]

WDC

From: [Redacted]
Sent: 26 January 2018 17:33
To: [Redacted]

Subject: RE: Ashdown Forest Transport Model

http://archivemanager.wealden.gov.uk/app.html/#/message/88ac149c-f201-3837-b684-edaaff9dd3e9/[20/12/2018 12:14:56]
RE: Ashdown Forest Transport Model

Sent: 2 February 2018 15:07

From: WDC

To: RDC

CC: HBC, WDC, RDC

Note: Attachments may contain viruses that are harmful to your computer. Attachments may not display correctly.

2 Attachments

Image001.jpg (575 B); image002.jpg (1 KB);

Dear RDC

Further to my earlier email, I can confirm that I have now spoken to at GTA Civils with regards to the WDC transport model. He has explained that he was mindful of the routine grouping of MSOAs when undertaking the grouping exercise and does not consider the grouping of MSOAs to be a limitation to the model. However, we both appreciate that you have not seen the outputs in order to consider implications for each MSOA. has said that he would be able to disaggregate the MSOAs for Rother District if it is of assistance. As this has both time and funding implications for WDC, can you confirm whether you would wish for me to instruct GTA Civils to undertake this work to help overcome your concerns.

Kind regards

WDC

From: WDC

Sent: 02 February 2018 10:11

To: RDC

Subject: RE: Ashdown Forest Transport Model

Dear RDC

Thank you for looking into this. With regards to Plan timescales and how they fit into the model, the new baseline for our model is 2014. We have the traffic flows at 2014 and data inputted into the model then includes anything in addition to the baseline at 2014. The reason for the 2014 baseline is that we use

[Link to document or website]
Tempro which currently has a 2014 baseline and it provides what it estimates will be coming forward from 2014 into the future. We are able to use Tempro as a substitute for your plan figures if you would prefer for us to use this data but as you have an adopted Plan it would be more appropriate to use that information.

The data you have provided which includes completions between 2011 and April 2014 will then provide an overestimate. If you have the ability to remove these completions then it would take away that issue. If you require some resource to help with this I am sure we can assist.

In terms of the MSOAs I am acting on advice from our consultants at GTA Civils. I can speak to them about the implications of merging MSOAs in your area and any limitations this may create. Again I will reiterate that I am more than willing to speak to you with regards to the transport model that we have and any assistance that we can provide.

In terms of your last paragraph, this email is copied to [Name] who is coordinating responses on behalf of the Council with regards to the letters of objection and I will see what we can do about answering your question prior to the meeting.

Kind regards

WDC

Wealden District Council | Council Offices | Vicarage Lane | Hailsham | East Sussex | BN27 2AX
Web. www.wealden.gov.uk

From: [Name] RDC
Sent: 01 February 2018 18:21
To: [Name] WDC
HBC, WDC, RDC
Subject: RE: Ashdown Forest Transport Model

WDC

My Technical Officer, [Name] has been able to work out the Core Strategy housing distribution by MSOAs, as below. As you can see, the assignment differs significantly from that suggested by [Name] If there are any queries on the figures, please contact [Name] in my absence (for the next couple of days).

I would also note that the Core Strategy sets a target of at least 5,700 net additional dwellings over the plan period and this is what we are working to.

Of course, the figures give totals from 2011, which include sites with planning permission at that date, as
well as at the 2013 statistic base date of the CS, and I am not clear how this is taken into account? Similarly, with developments that have been built already?

As regards the use of the figures, I should also say that that, while providing this information as quickly as possible to help you factor in the adopted Core Strategy housing figures into your modelling work, it does not imply any endorsement of combining MSOSs, as indicated by the plan attached to email. Indeed, my initial view is that the suggested combining of MSOAs (which themselves can contain well spread-out settlements) will not accurately account for (and therefore will misrepresent) the actual location of planned development and, hence, the routing of traffic.

As I say, I can appreciate the need to incorporate these figures in your assessment and we have sought to cooperate with you on this expeditiously, but it seems odd that WDC has lodged objections to planning applications across Rother, but is only now looking to ascertain the information needed to be able to accurately determine if those developments would have any impact on relevant traffic flows.

The making of formal representations on planning applications by a LPA carries huge significance. As such, in my view, these should only be made where they are backed up by detailed, technical traffic (as well as air quality and ecological) evidence specific to the development under scrutiny. I can appreciate the need for WDC to respond to its overall ecological evidence and the ‘precautionary principle’ – and agree that this should be taken on board by all relevant new Local Plans, collectively - but I think RDC can legitimately ask what the detailed evidence is objecting to a specific application in terms of traffic generation, even on an ‘in combination’ basis, especially as my initial review of likely flows does not suggest any impact on the SACs. I would welcome a response on this before our meeting, in the hope that it need not be raised there.

Regards,

[Redacted] RDC

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<thead>
<tr>
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<th>CS Housing</th>
<th>Settlements</th>
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<tbody>
<tr>
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<td>129</td>
<td>Ticehurst, Flimwell, Stonegate</td>
</tr>
<tr>
<td>Rother 002</td>
<td>290</td>
<td>Robertsbridge, Hurst Green, Etchingham, Bodiam</td>
</tr>
<tr>
<td>Rother 003</td>
<td>358</td>
<td>Northiam, Beckley, Peasmarsh, Iden, Camber</td>
</tr>
<tr>
<td>Rother 004</td>
<td>109</td>
<td>Burwash, Brightling, Dallington, Netherfield</td>
</tr>
<tr>
<td>Rother 005</td>
<td>118</td>
<td>Sedlescombe, Staplecross, Mountfield, Whatlington, Ewhurst</td>
</tr>
<tr>
<td>Rother 006</td>
<td>367</td>
<td>Rye, Rye Harbour, Icklesham, Winchelsea</td>
</tr>
<tr>
<td>Rother 007</td>
<td>362</td>
<td>Fringes, Westfield, Broad Oak, Fairlight, Udimore, Guestling, Pett, Three Oaks, Brede, Cackle Str</td>
</tr>
<tr>
<td>Rother 008</td>
<td>562</td>
<td>Battle, Catsfield, Crowhurst, Ashburnham</td>
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<td>Rother 009</td>
<td>1400</td>
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<td>Pesham</td>
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<tr>
<td>Rother 011</td>
<td>1000</td>
<td>Little Common, Coorden, NW Sidley</td>
</tr>
<tr>
<td>Rother 012</td>
<td>200</td>
<td>Midwest Bexhill</td>
</tr>
<tr>
<td>Sub-total</td>
<td>5395</td>
<td></td>
</tr>
</tbody>
</table>

http://archivemanager.wealden.gov.uk/app.html#/message/0950a13 9c83 336a 5724 01d372e8224d/[20/12/2018 12:05:05]
NB The unallocated Rural windfall and exceptions site allowance is split between the four rural MSOAs (001, 002, 003 and 005).

If we apply these figures in the same groups of MSOAs, as you (WDC) have asked, we get the following table:

<table>
<thead>
<tr>
<th>MSOA</th>
<th>Housing number</th>
</tr>
</thead>
<tbody>
<tr>
<td>Rother 001 &amp; 003 - Robertsbridge</td>
<td>799</td>
</tr>
<tr>
<td>Rother 002 &amp; 004 to 005 - Rye &amp; Winchelsea</td>
<td>1241</td>
</tr>
<tr>
<td>Rother 006 - Battle</td>
<td>562</td>
</tr>
<tr>
<td>Rother 007 to 011 - Bexhill</td>
<td>3100</td>
</tr>
<tr>
<td></td>
<td>5702</td>
</tr>
</tbody>
</table>

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RDC
Strategy & Planning Service
Rother District Council

Website [www.rother.gov.uk](http://www.rother.gov.uk)

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From: [REDACTED] WDC
Sent: 26 January 2018 17:38
To: [REDACTED] RDC
[REDACTED] HBC, WDC

Subject: RE: Ashdown Forest Transport Model

Dear [REDACTED] RDC

Thank you for your email and your assistance in ensuring that the transport model has the correct inputs. As you will no doubt appreciate Wealden District Council is seeking to publish its Local Plan as soon as possible and this has resulted in very tight timescales in such matters as air quality modelling. However, I also understand your time constraints and the need to have an agreed figure in the model.

On the matter of the transport model, I am happy to discuss whether we can assist you in this regard.

Kind regards

[http://archivemanager.wealden.gov.uk/app.html/#/message/0950ac13-9cd8-336a-5724-01d372c8224d/20/12/2018 12:05:05]
I have had a quick look at your email, but will not be able to reply properly in two days, having been tied up in meetings all day today and on leave Monday! Indeed, I am pretty well tied up all next week.

In fairness, it is an unreasonably tight deadline. Rother need to give it proper consideration, especially given its relevance to what is now a significant issue.

We are now having to approach transport consultants on the overall Ashdown Forest issue and your question also raises the principle of combining of our MSOAs, which I should probably comment, having spoken to someone. In this regard, I would note that we have previously asked about the traffic flow justification for representations that WDC has made on applications to date and am awaiting definitive advice.

My immediate observation on your assumptions is that it is patently wrong to distribute the Rural Areas growth as you suggest, equally between what are essentially urban MSOAs and the rural ones, nor to factor in the focus for growth on Rye in the east of the District.

We obviously can look more thoroughly at the areas (which aren’t very clear on the map, but we should be able to download) and identify what settlements are in what areas. You will appreciate that it is better to have more refined figures than take a broad-brush, but ultimately wrong, approach even if it takes an extra few days.

We will try and sort this out later next week, so the best we can do is undertake to respond within 10 days.

In the meantime, I have no choice but to advise that, for the above reasons, we do not accept your assumptions and, if you were to not wait for proper, timely advice, would wish this to be put on record.

Thanks.

RDC

Strategy & Planning Service
Rother District Council
RE: Ashdown Forest Transport Model

Sent: 12 February 2018 15:22

From: [REDACTED] RDC

WDC, HBC, RDC

Note: Attachments may contain viruses that are harmful to your computer. Attachments may not display correctly.

2 Attachments
- image003.jpg (740 B); image004.jpg (2 KB);

Further to emails below, I am writing to provide further information, and some observations, in relation to the scale and distribution of development in Rother.

Firstly though, I must note that this is being provided without the benefit of either a call back to my telephone message left before last week’s meeting to discuss the transport model, nor a response to the query I posed in the last paragraph of my email of 1/2-1/18 below. While I feel that it would have saved time to discuss the points that I have now set out in writing below, I recognise that both you and [REDACTED] WDC are busy and hope the following helps you move things forward, at least in this particular respect.

Completions
I previously provided the Core Strategy housing requirements from 2011-2028, as requested, but in response to your first email of 2/2, please see the table below with 2011-2014 completions removed:

<table>
<thead>
<tr>
<th>MSOA</th>
<th>CS Housing</th>
<th>Settlements</th>
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</thead>
<tbody>
<tr>
<td>Rother 001</td>
<td>118</td>
<td>Ticehurst, Flimwell, Stonegate</td>
</tr>
<tr>
<td></td>
<td>287</td>
<td>Robertsbridge, Hurst Green, Etchingham, Bodiam</td>
</tr>
<tr>
<td>Rother 002</td>
<td>269</td>
<td>Northiam, Beckley, Peasmarsh, Iden, Camber, East Gulde'ord</td>
</tr>
<tr>
<td>Rother 003</td>
<td>105</td>
<td>Burwash, Brightling, Dallington, Netherfield</td>
</tr>
<tr>
<td></td>
<td>91</td>
<td>Sedlescombe, Staplecross, Mountfield, Whatlington, Ewhurst</td>
</tr>
<tr>
<td>Rother 004</td>
<td>267</td>
<td>Rye, Rye Harbour, Icklesham, Winchelsea</td>
</tr>
<tr>
<td>Rother 005</td>
<td>324</td>
<td>Fringes, Westfield, Broad Oak, Fairlight, Udimore, Guestling, Pett, Thr</td>
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<tr>
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<td>545</td>
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<tr>
<td>Rother 007</td>
<td>1337</td>
<td>Sidley, Worsham, Old Town</td>
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<td>Rother 008</td>
<td>286</td>
<td>Pebsham</td>
</tr>
</tbody>
</table>

http://archivemanager.wealden.gov.uk/app.html#/message/2b5b5a70-13c4-2dec-9382-7083ce41bfa7/[20/12/2018 12:01:07]
Rother 009 955 Little Common, Cooden, NW Sidley
Rother 010 191 Midwest Bexhill
Rother 011 191 Central
Sub-total 4966
Rural windfall 217
Exception Sites 35
Total 5218

(Windfall and exceptions figures adjusted to 2014 Housing Supply doc figs)

**MSOAs**

You mentioned the option of using our actual figures rather than Tempro growth estimates as being more appropriate, which I would not only agree with, but would say was critical. I would be interested to know how the two compare?

Your follow-up email of 2/2 states that your traffic consultant “does not consider the grouping of MSOAs to be a limitation to the model”.

I am not convinced about this or, indeed, the accuracy of relying on MSOAs for determining traffic routing. For example, the growth villages in MSOA1 and 3 are notably Robertsbridge (155) and Ticehurst (85), followed by Hurst Green (81) and Sedlescombe (76). They all have different connections and associated flows (although I would not anticipate traffic from these villages going across or close to the Forest). Similarly, in MSOA6, Battle and Catsfield (the largest village for growth) have some different route preferences.

Therefore, please can you clarify how these differences are accounted for by your transport model? In view of the above, it would clearly be wrong to simply increase the flows on all roads from that MSOA proportionally.

It is, of course, for WDC to refine its transport model as it sees fit, but in fairness, I am raising these concerns now.

If the transport model were to suggest that there are material additional movements generated by the developments in Rother affecting the Ashdown Forest (which I would not anticipate), I would like the opportunity to fully interrogate it, especially as the assumptions suggested to date would appear to overstate relevant flows.

Finally, while providing this information in good faith, I’m not clear how you are intending to use it, but would expect WDC to accept the provisions of the adopted Core Strategy as commitments, effectively ‘background growth’, for the purposes of calculating ‘in combination’ effects.

Regards,

[Redacted]

Strategy & Planning Service

http://archivemanager.wealden.gov.uk/app.html#/message/2b5b5a70-13e4-2dec-9382-7083ce41bfa7/[20/12/2018 12:01:07]

RDC74
Rother District Council

From: WDC
Sent: 02 February 2018 15:07
To: RDC
Cc: HBC, WDC, RDC
Subject: RE: Ashdown Forest Transport Model

Dear RDC

Further to my earlier email, I can confirm that I have now spoken to [redacted] at GTA Civils with regards to the WDC transport model. He has explained that he was mindful of the routeing of individual MSOAs when undertaking the grouping exercise and does not consider the grouping of MSOAs to be a limitation to the model. However, we both appreciate that you have not seen the outputs in order to consider implications for each MSOA. [redacted] has said that he would be able to disaggregate the MSOAs for Rother District if it is of assistance. As this has both time and funding implications for WDC, can you confirm whether you would wish for me to instruct GTA Civils to undertake this work to help overcome your concerns.

Kind regards

[redacted] WDC

From: WDC
Sent: 02 February 2018 10:11
To: RDC
Cc: HBC, WDC, RDC
Subject: RE: Ashdown Forest Transport Model

Dear RDC

Thank you for looking into this. With regards to Plan timescales and how they fit into the model, the new baseline for our model is 2014. We have the traffic flows at 2014 and data inputted into the model then includes anything in addition to the baseline at 2014. The reason for the 2014 baseline is that we use Tempro which currently has a 2014 baseline and it provides what it estimates will be coming forward from 2014 into the future. We are able to use Tempro as a substitute for your plan figures if you would prefer for us to use this data but as you have an adopted Plan it would be more appropriate to use that information.

The data you have provided which includes completions between 2011 and April 2014 will then provide an overestimate. If you have the ability to remove these completions then it would take away that issue.

http://archivemanager.wealden.gov.uk/app.html#/message/2b5b5a70-13e4-2dec-9382-7083ce41bfa7/[20/12/2018 12:01:07]

RDC75
If you require some resource to help with this I am sure we can assist.

In terms of the MSOAs I am acting on advice from our consultants at GTA Civils. I can speak to them about the implications of merging MSOAs in your area and any limitations this may create. Again I will reiterate that I am more than willing to speak to you with regards to the transport model that we have and any assistance that we can provide.

In terms of your last paragraph, this email is copied to [REDACTED] who is coordinating responses on behalf of the Council with regards to the letters of objection and I will see what we can do about answering your question prior to the meeting.

Kind regards

[REDACTED]

Wealden District Council | Council Offices | Vicarage Lane | Hailsham | East Sussex | BN27 2AX
Web. www.wealden.gov.uk

From: [REDACTED] RDC
Sent: 01 February 2018 18:21
To: [REDACTED] WDC
HBC, WDC, RDC
Subject: RE: Ashdown Forest Transport Model

[REDACTED] RDC
[REDACTED] WDC

My Technical Officer, [REDACTED] has been able to work out the Core Strategy housing distribution by MSOAs, as below. As you can see, the assignment differs significantly from that suggested by [REDACTED]. If there are any queries on the figures, please contact [REDACTED] in my absence (for the next couple of days).

I would also note that the Core Strategy sets a target of at least 5,700 net additional dwellings over the plan period and this is what we are working to.

Of course, the figures give totals from 2011, which include sites with planning permission at that date, as well as at the 2013 statistic base date of the CS, and I am not clear how this is taken into account? Similarly, with developments that have been built already?

As regards the use of the figures, I should also say that that, while providing this information as quickly as possible to help you factor in the adopted Core Strategy housing figures into your modelling work, it does not imply any endorsement of combining MSOAs, as indicated by the plan attached to [REDACTED] email. Indeed, my initial view is that the suggested combining of MSOAs (which themselves can contain

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As I say, I can appreciate the need to incorporate these figures in your assessment and we have sought to cooperate with you on this expeditiously, but it seems odd that WDC has lodged objections to planning applications across Rother, but is only now looking to ascertain the information needed to be able to accurately determine if those developments would have any impact on relevant traffic flows.

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Regards,

RDC

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<td>Rother 005</td>
<td>362</td>
<td>Fringes, Westfield, Broad Oak, Fairlight, Udimore, Guestling, Pett, Three Oaks, Brede, Cackle Str</td>
</tr>
<tr>
<td>Rother 006</td>
<td>562</td>
<td>Battle, Catsfield, Crowhurst, Ashburnham</td>
</tr>
<tr>
<td>Rother 007</td>
<td>1400</td>
<td>Sidley, Worsham, Old Town</td>
</tr>
<tr>
<td>Rother 008</td>
<td>300</td>
<td>Pebsham</td>
</tr>
<tr>
<td>Rother 009</td>
<td>1000</td>
<td>Little Common, Cooden, NW Sidley</td>
</tr>
<tr>
<td>Rother 010</td>
<td>200</td>
<td>Midwest Bexhill</td>
</tr>
<tr>
<td>Rother 011</td>
<td>200</td>
<td>Central</td>
</tr>
<tr>
<td>Sub-total</td>
<td>5395</td>
<td></td>
</tr>
<tr>
<td>Rural windfall</td>
<td>242</td>
<td></td>
</tr>
<tr>
<td>Exception Sites</td>
<td>65</td>
<td></td>
</tr>
<tr>
<td>Total</td>
<td>5702</td>
<td></td>
</tr>
</tbody>
</table>

NB The unallocated Rural windfall and exceptions site allowance is split between the four rural MSOAs (001, 002, 003 and 005).

http://archivemanager.wealden.gov.uk/app.html#message/2b5b5a70-13e4-2dec-9382-7083ce41bfa7[20/12/2018 12:01:07]
If we apply these figures in the same groups of MSOAs, as you (WDC) have asked, we get the following table:

<table>
<thead>
<tr>
<th>MSOA</th>
<th>Housing number</th>
</tr>
</thead>
<tbody>
<tr>
<td>Rother 001 &amp; 003 - Robertsbridge</td>
<td>799</td>
</tr>
<tr>
<td>Rother 002 &amp; 004 to 005 - Rye &amp; Winchelsea</td>
<td>1241</td>
</tr>
<tr>
<td>Rother 006 - Battle</td>
<td>562</td>
</tr>
<tr>
<td>Rother 007 to 011 - Bexhill</td>
<td>3100</td>
</tr>
<tr>
<td></td>
<td>5702</td>
</tr>
</tbody>
</table>

RDC
Strategy & Planning Service
Rother District Council

Website www.rother.gov.uk

From: [redacted] WDC
Sent: 26 January 2018 17:38
To: [redacted] RDC
Subject: RE: Ashdown Forest Transport Model

Dear [redacted] RDC

Thank you for your email and your assistance in ensuring that the transport model has the correct inputs. As you will no doubt appreciate Wealden District Council is seeking to publish its Local Plan as soon as possible and this has resulted in very tight timescales in such matters as air quality modelling. However, I also understand your time constraints and the need to have an agreed figure in the model.

On the matter of the transport model, I am happy to discuss whether we can assist you in this regard.

Kind regards

[redacted] WDC

From: [redacted] RDC
Sent: 26 January 2018 16:55
To: [redacted] WDC
Subject: RE: Ashdown Forest Transport Model

http://archivemanager.wealden.gov.uk/app.html#message/2b5b5a70-13e4-42de-9382-7933ce41bfa7/[20/12/2018 12:01:07]

RDC78
I have had a quick look at your email, but will not be able to reply properly in two days, having been tied up in meetings all day today and on leave Monday! Indeed, I am pretty well tied up all next week.

In fairness, it is an unreasonably tight deadline. Rother need to give it proper consideration, especially given its relevance to what is now a significant issue.

We are now having to approach transport consultants on the overall Ashdown Forest issue and your question also raises the principle of combining of our MSOAs, which I should probably comment, having spoken to someone. In this regard, I would note that we have previously asked about the traffic flow justification for representations that WDC has made on applications to date and am awaiting definitive advice.

My immediate observation on your assumptions is that it is patently wrong to distribute the Rural Areas growth as you suggest, equally between what are essentially urban MSOAs and the rural ones, nor to factor in the focus for growth on Rye in the east of the District.

We obviously can look more thoroughly at the areas (which aren’t very clear on the map, but we should be able to download) and identify what settlements are in what areas. You will appreciate that it is better to have more refined figures than take a broad-brush, but ultimately wrong, approach even if it takes an extra few days.

We will try and sort this out later next week, so the best we can do is undertake to respond within 10 days.

In the meantime, I have no choice but to advise that, for the above reasons, we do not accept your assumptions and, if you were to not wait for proper, timely advice, would wish this to be put on record.

Thanks.
Dear RDC

I tried to call, but I expect you are busy. I understand that today is the closing date for comments to Ticehurst NDP.

I wanted to let you know that we are intending to send a response to the NDP. The comment will say that it is noted that the NDP has not been subject to a Habitat Regulations Assessment screening to date and we consider that it is necessary to determine whether the plan is likely to have a significant effect. It will go on further to say that the outcome of a Habitats Regulations screening assessment may also have an impact upon the results of the Strategic Environmental Assessment. For the above reasons, we consider that the plan does not currently meet the necessary legal tests or requirements as relevant to European Directives including The Habitats Directive and the Strategic Environmental Assessment Directive.

What I have not included is that I have now checked our model (before sending this email) and based on this we consider that housing development in general in the MSOA in which Ticehurst is located has the potential to increase traffic on roads adjacent to Ashdown Forest, Lewes Downs and Pevensey Levels. I am happy to explain this to you, but I wanted to let you know that I checked this before sending the response.
RE: Ashdown Forest Transport Model

Sent: 15 February 2018 13:02
From: WDC
To: RDC
CC: WDC, RDC

Note: Attachments may contain viruses that are harmful to your computer. Attachments may not display correctly.

2 Attachments
image001.jpg (740 B); image002.jpg (7 KB);

Dear RDC,

Thank you for getting back to me so quickly on this and note your comments. This information has been fed back to [redacted] for input into the model.

Kind regards,

WDC

Environment and Community Services
Wealden District Council | Council Offices | Vicarage Lane | Hailsham | East Sussex | BN27 2AX
Web. www.wealden.gov.uk/planningpolicy

From: RDC
Sent: 15 February 2018 09:42
To: WDC
Cc: WDC, RDC
Subject: RE: Ashdown Forest Transport Model

WDC

Good point. I should have added the following table, which has an explanation of the windfall and exception sites allocations:

<table>
<thead>
<tr>
<th></th>
<th>CS</th>
</tr>
</thead>
</table>

http://archivemanager.wealden.gov.uk/app.html#/message/4ff36648-0ca3-4def-ef82-3dda41c2db7f/20/12/2018 11:59:05
RE: Meeting re DTC

Sent: 13 August 2018 11:04
From: WDC
To: RDC

Note: Attachments may contain viruses that are harmful to your computer. Attachments may not display correctly.

2 Attachments

Less

Great Thanks [REDACTED] Yes it was nice to be away and I managed not to log onto emails! I hope that you have a good time too (with some relaxation).

WDC

From: RDC
Sent: 13 August 2018 10:36
To: WDC
Subject: RE: Meeting re DTC

WDC

Cheers. Hope you had a relaxing holiday.

I will put some things down on a draft agenda for you to add your items to at the beginning of that week when I'm back from hols.

RDC

Strategy & Planning Service
Rother District Council

Website www.rother.gov.uk
From: WDC
Sent: 13 August 2018 09:43
To: RDC, WDC
Subject: RE: Meeting re DTC

Morning RDC

Just to confirm that the time and location is in my diary.

Kind regards

WDC

From: WDC
Sent: 03 August 2018 20:23
To: RDC, WDC
Subject: RE: Meeting re DTC

Hi RDC
I'm sure that will be ok. See you then.

Kind regards

WDC

From: RDC
Sent: 03 August 2018 16:47
To: WDC
Cc: WDC
Subject: RE: Meeting re DTC

WDC

Please can we make it 2.00pm as I have a morning meeting and expect it to be long?

Thanks,

RDC

Strategy & Planning Service

http://archivemanager.weakden.gov.uk/app.html#/message/37a8e0bc-dbc6-3eb2-438e-fb46063f2a6f[20/12/2018 11:16:13]
Rother District Council

Website www.rother.gov.uk

From: WDC
Sent: 03 August 2018 15:49
To: RDC, WDC
Subject: RE: Meeting re DTC

Hi RDC

WDC is on leave however I can confirm that the date is still ok. What time in Bexhill? Would 13.30 work?

Thanks

WDC

From: RDC
Sent: 03 August 2018 15:44
To: WDC
Cc: WDC
Subject: RE: Meeting re DTC

WDC

The afternoon of 7th September is fine if that is still ok.

It would help if you could come to Bexhill.

Regards,

RDC

Strategy & Planning Service
Rother District Council

Website www.rother.gov.uk

Hi RDC

Further to our discussion the day before yesterday, it would be good to meet to discuss duty to cooperate issues including Housing Market Area, Housing Supply etc. Ultimately we would be looking for a Statement of Common Ground to deal with the cross boundary strategic issues that are not dealt with elsewhere.

I know August is difficult because of leave, but I was looking to see if you are free on 4th September (pm) or 7th September. If it is of help we could come down to Bexhill.

Kind regards

WDC

Wealden District Council  Council Offices  Vicarage Lane  Hailsham  East Sussex  BN27 9AX

Web. www.wealden.gov.uk

Communities

Environment

Economy

www.wealden.gov.uk
Duty to Cooperate
Rother and Wealden Districts
Draft Agenda
7th September 2018

1. Plan progress
   RDC
   WDC

2. Housing Market Area
   Implications of different approaches

3. Undersupply/ Oversupply and meeting cross boundary needs
   Housing
   Employment
   Other

4. Pevensey Levels and hydrology

5. Air quality and ecology

6. Cross boundary infrastructure matters

7. Consistency of approaches to common issues, eg the AONB, biodiversity, countryside policies

8. Future Plans and SPDs

9. AORB
RE: Meeting Tomorrow

Sent: 6 September 2018 17:03
From: WDC
To: RDC
CC: RDC

Note: Attachments may contain viruses that are harmful to your computer. Attachments may not display correctly.

3 Attachments

Image001.jpg (575 B); Image002.jpg (1 KB); Rother Duty to Cooperate1.docx (18 KB);

Thanks RDC

I have added in your items. See you tomorrow.

WDC

From: RDC
Sent: 06 September 2018 11:55
To: WDC
Cc: WDC, RDC
Subject: RE: Meeting Tomorrow

WDC

Thanks for this.

I think that, as I mentioned on the phone, we are currently putting together our Development and Site Allocations ("DaSA") Local Plan, so this is a good time to also cover the general consistency of approaches to common issues, such as the AONB, biodiversity, countryside policies, etc. We don’t want agents playing us off against each other on such things if avoidable. It probably fits in after item 6.

Regards,

RDC

http://archivemanager.wcalden.gov.uk/app.html#/message/c4aeca6-a321-b843-c9cc-deb44e65594b[20/12/2018 11:02:40]

RDC87
Hello RDC,

I hope you had a good break. I took the liberty of putting together a draft agenda for tomorrow. Happy for you to amend/ add.

Kind regards,

WDC

Wealden District Council | Council Offices | Vicarage Lane | Hailsham | East Sussex | BN27 2AX
Web. www.wealden.gov.uk

Communities
Environment
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www.wealden.gov.uk
Facebook
@wealdenDC

Sign up to MyWealden to access our services online

http://archivemanager.wealden.gov.uk/app.html#/message/c4aeca6-a321-b843-c9cc-de344a65594b/[20/12/2018 11:02:40]

RDC88
Rother District Council and Wealden District Council
Duty to Cooperate Meeting
Draft Minutes

Date: 7th September 2018

Attendees: RDC WDC RDC WDC

1. Plan progress & Timetable

    RDC: and WDC set out their respective local plan programmes.

    **Development and Site Allocations (DaSA) Local Plan**
    - Effectively “part 2”, following on from adoption of the Core Strategy
    - Cabinet – 1st October (agenda published 26th September)
    - Full Council – 15th October
    - Period for Representations – Starting 26th October for six weeks
    - Submit to PINS – by 24th January 2019

    - Immediate review of the Core Strategy – in parallel with Hastings BC (15 years from date of review adoption – 2036)
    - Timetable for Core Strategy review – Regulation 18 consultation – September/October 2019

    **WDC:**

    **Wealden Local Plan**
    - Proposed Submission version – consultation 13 August - 8 October 2018
    - 10 year Plan with caveats (Ashdown Forest – nitrogen deposition, A27 issues and WWTW are trigger points in the Plan)
    - Intends to submit to PINS in December 2018
    - Immediate review – although no timetable at the moment
    - Potential longer term options in Wealden:
      - Berwick Station
      - West of Hailsham
2. Housing Market Area (HMA)

WDC noted that RDC had challenged the inclusion of Rother in the Wealden HMA and explained the view of consultants of the wider area.

RDC explained the background for Rother - RDC part of the Hastings & Rother Housing Market Area. While there was a small shortfall against its need figure, RDC hadn't asked WDC to take any of their unmet need.

WDC

It was agreed that there was little practical effect of the difference of view on the HMA boundaries, as noted that WDC had limited capacity for further growth, only being able to meet its own need. Its Local Plan provides for 950 per annum. (This compares to an extra 1,000 dwellings under the new (draft) methodology.)

3. Other cross boundary development needs/provisions

Employment

RDC

- Strong retention policy
- In-house employment evidence
- NE Bexhill – 33,500sq.m B1 floorspace

WDC

- Strong retention policy
- Regeneris Consultants developed employment evidence
- A22 Corridor proposal

No issues were identified.

Retail

RDC

- GVA developing retail evidence
- Verifying proposed convenience retail allocation of 2,000sq.m

WDC

- Carter Jonas developed retail evidence
- Retail provisions are low
- WDC has purchased retail sites in Hailsham Town Centre – looking to regenerate

No issues were identified.
4. Pevensey Levels and hydrology

**RDC approach**
- Hydrology/water quality – infiltration into the Levels
- Agreed with NE & EA – 2 stages of SuDS treatment

**WDC approach**
- South Wealden Growth Area See policy SWGA7 – Page 138
- Support for SuDS and mitigation of strategic scale

5. Air quality and ecology

RDC will be looking at this in relation to the WLP and commenting on it in their representations, particularly regarding the level of cooperation and due to the Pevensey Levels being partly within Rother District.

WDC are working on the basis that there are no existing issues regarding the Pevensey Levels. MB advised that there had been introduction of nitrogen in the water in the Pevensey Levels. WDC stated that WDC would be in touch to discuss this with RDC indicated that he would need to take advice on this.

WDC highlighted very recent Advocate General’s advice – Netherlands case – nitrogen deposition and mitigation – which supports WDC position.

WDC explained about the need for mitigation for Ashdown Forest, Lewes Downs and Pevensey Levels sites and that WDC needed to have certainty over this mitigation. Mitigation would take the form of a tariff.

RDC asked to what extent this takes into account commitments in other Local Plans. WDC stated that WDC are not mitigating for other Plans and that WDC alone and in-combination has an impact on air quality. WDC are looking to mitigate for deposition from traffic in respect of Wealden only.

WDC – WDC are not expecting other LPAs to include a tariff – although Mid Sussex has indicated that they may introduce one in the future review.

RDC asked how does WDC separate out effects to know what their (the Wealden) impact is?

WDC explained the need to monitor and measure (ancillary monitoring). Mitigation measures included reduction in speed limits, electric charging vehicle points, for example. Also, it is working with ESCC as Highway Authority – Low Emission Zones within the Forest may be a possibility.

There was agreement on the benefits of a Shared Nitrogen Action Plan (SNAP) notwithstanding differences of view on the need for mitigation from new development. This had been mooted through the Ashdown Forest Working Group.
RDC explained that RDC are undertaking their HRA presently and would consider the WDC evidence published to date.

6. Cross boundary infrastructure matters

A27
- WLP - A27 – references in WLP para 7.14 & Policy INF3, dualling of A27 at Polegate, offline A27 are expected post 2028.
- Policies SWGA3 & SWGA4 are relevant. Policy SWGA4 is effectively a cap policy.

WDC highlighted that NE are likely to raise major concerns with offline A27 improvements due to impact on the South Downs.

RDC highlighted that while expecting to support the proposal in principle, there was a need to consider the knock-on impacts that A27 improvements would have on Bexhill. confirmed that she had raised this issue.

High Speed Rail (HSR) extension
- Summit due in October
- HSR through route along the Marshlink, now looking as going to Eastbourne Rother, Hastings and Eastbourne support HSR
- Works are needed to Ashford Station first – technical study ongoing
- Still question marks over what goes into the Franchise as it’s up for renewal

7. Consistency of approaches to common issues, eg the AONB, biodiversity, countryside policies

There was a short discussion on approaches to these similar policies between RDC & WDC policies:
- Net gains in biodiversity
- SAMMS and SANGS
- Green infrastructure
- High Weald AONB
- Employment land policies
- Development in countryside
- Conversion of rural buildings
- Rural economy
- Loss of pubs
- Equestrian
- Affordable housing
- Older People’s housing
- Access and space standards
- Self/custom housebuilding
- Gypsies and Travellers – identified two sites (WDC owned) to meet need
- Water efficiency
- Housing mix
8. Future Plans and SPDs

RDC
- Local Plan Review starting now

WDC
- Reviewing CIL
- SPDs – Green infrastructure, Rural conversions

9. AORB

No matters raised
Re: Draft DtC Minutes - RDC & WDC - September 2018

Sent: 9 October 2018 15:14
From: WDC
To: RDC, WDC
CC: 

Thank you and I will take a look and get back to you by the 19th.

Kind regards

WDC

Sent from my iPhone

On 8 Oct 2018, at 14:29, wrote:

Hi WDC

Please see the attached draft minutes from our DtC meeting in September for your consideration and comment. Apologies for the time taken to draft the meeting note but you’ll appreciate the background preparation we’ve been undertaking in getting the DaSA ready for Cabinet and Full Council.

If you able to look through the minutes and provide any comments to us by 19th October, I would be grateful.

Kind regards

RDC

Rother District Council
Town Hall
Bexhill-on-Sea
East Sussex
TN39 3JX
Hi [Name]

RDC

I hope that you and [Name] have had a rest after pulling the Rother Plan together.

Please find attached our comments (in the form of tracked changes) to the minutes and thank you for writing the minutes in the first instance.

Kind regards

[Name] WDC

---

Hi [Name]

RDC

Please see the attached draft minutes from our DtC meeting in September for your consideration and comment. Apologies for the time taken to draft the meeting note but you'll appreciate the background preparation we've been undertaking in getting the DaSA ready for Cabinet and Full Council.

If you able to look through the minutes and provide any comments to us by 19th October, I would be grateful.

Kind regards

[Name] RDC
Hi RDC

Hi RDC.

WDC

I hope all is well. [REDACTED] has just gone into a meeting and asked me to send you a link to Natural England’s comments in my absence.

If you use the following link you will get to the document in the portal
http://consult.westlondon.gov.uk/portal/planning/wealden_local_plan/pswlp?pointId=4973313

Then click on the view comments on the heading Proposed Submission Wealden Local Plan. You will need to scroll down to Natural England’s comments. At the bottom of the comment by Natural England is a pdf of the submission entitled PSWLP1350 Marian Ashdown Natural England Whole Rep.pdf. Alternatively under “who said what” search for Natural England under consultee and this lists all the comments. The second comment down also has the pdf of the whole rep.

I am also attaching the pdf.

Kind regards
RE: Ashdown Forest Working Group

Sent: 22 October 2018 13:08
From: [redacted] WDC
To: [redacted] RDC

Note: Attachments may contain viruses that are harmful to your computer. Attachments may not display correctly.

2 Attachments

Less

RDC

Sorry I was in meetings this morning.

On another but related matter, [redacted] mentioned that from the recent meeting you had that you may wish to chat about Pevensey Levels? I am happy to discuss this if you would like to let me know a convenient time? I am pretty busy this week but I can make some time in between meetings if that would help?

Best wishes

WDC

Environment and Community Services
Wealden District Council | Council Offices | Vicarage Lane | Hailsham | East Sussex | BN27 2AX
Web. www.wealden.gov.uk/planningpolicy

RDC
Sent: 22 October 2018 09:35
To: [redacted] WDC
Subject: RE: Ashdown Forest Working Group

WDC

http://archivemanager.wealden.gov.uk/app.html#message/e43a682f-d44e-2d5b-e616-9813ee4e409/[20/12/2018 10:50:14]
Hi. Having read the Update and noticing the reference to Natural England and that "Their response is set out within the consultation portal", I went to look for the consultation portal on the WLP webpage but couldn't see a link. Am I looking in the wrong place?

Thanks,

RDC

Strategy & Planning Service
Rother District Council

Website www.rother.gov.uk

From: WDC
Sent: 19 October 2018 17:57
To: RDC, WDC
Subject: RE: Ashdown Forest Working Group

Dear all

WDC

On behalf of RDC please see attached the latest Wealden Local Plan update. This statement will be uploaded onto our website on Monday.

Have a good weekend.

Kind regards

WDC

Environment and Community Services
Wealden District Council | Council Offices | Vicarage Lane | Hailsham | East Sussex | BN27 2AX

Hi RDC

Thanks for your email. I have just had a word with [redacted] and she is going to get back to you with a proposal of how we address the items for the agenda.

I'm glad that [redacted] will be attending so that Rother can have their input.

Regards

[redacted]

WDC

Wealden District Council

-----Original Message-----
From: [redacted] WDC
Sent: 22 October 2018 15:14
To: [redacted] WDC, RDC
Subject: RE: Agenda for East Sussex Strategy Planning Members Group Meeting - 2 November 2018

WDC

Thanks. I had just noted [redacted] email and had a few observations.

As you say, my thinking is indeed to bring the focus back to the opportunity and benefits to the wider area of collaborative working across the board, not limited to the more vexed HRA matters. I saw this as a very much "in principle" heads up, rather than a fully formed paper.

I see that [redacted] is proposing to cover the wider topic, although I'm not sure to what degree, as it's not something Local Plan managers have discussed. I appreciate the offer of prior discussion. We should then share with colleagues so they can brief Members. It may be that the two can be wrapped up together.

RDC

Of course, as mentioned, I am on leave next week, so [redacted] will attend for RDC. [redacted] is on leave today, so will discuss papers with [redacted] tomorrow. It is likely that we won't be able to prepare anything by Wednesday as I'm busy getting ready for publication of our Local Plan on Friday.

Regards,

[redacted]

Strategy & Planning Service
Rother District Council

http://archivemanager.wealden.gov.uk/app.html#/message/1f9fc9d-45a3-ab63-7fdc-04857859d1ae/20/12/2018 10:48:17
-----Original Message-----
From: [Redacted] RDC, WDC
Sent: 22 October 2018 13:19
To: [Redacted] RDC
Subject: FW: Agenda for East Sussex Strategy Planning Members Group Meeting - 2 November 2018
HI [Redacted] RDC

I hope you're well.

Apologies that I didn't see the draft agenda before this email was sent. I am wondering if items 6 and 7 are really the same thing? From your perspective you may want to lead on the problems up to now and then perhaps [Redacted] can lead on a future working protocol? However, I think you said that you couldn't go to the meeting, so will anyone be attending in your place?

I spoke to [Redacted] last Thursday to give her some feedback from our meeting and she agreed to make sure you saw any paper on future working in advance. I will speak to her again later today and see when the paper is likely to be ready to circulate.

Regards

-----Original Message-----
From: [Redacted] WDC
Sent: 22 October 2018 12:53
To: [Redacted] ESCC, RDC, WDC
Subject: Agenda for East Sussex Strategy Planning Members Group Meeting - 2 November 2018

Hello

I'm due to send out the agenda for the East Sussex Strategy Planning Members Group Meeting taking place on 2 November 2018 and would be grateful to receive any papers by 4.30 pm on Wednesday 24th October. Please can you let me know if you are able to send me papers for your item(s) by this time or if they will be 'to follow'. I've attached a previous report that went to the meeting a few years as an example cover report if needed for a template.

The following are the items on the agenda:

1. Apologies for Absence
2. Minutes of Meeting on 8 March 2017
3. Discussion on cross boundary strategic planning matters concerning the Wealden Local Plan - [Redacted] WDC
5. Rother District Council Development and Site Allocations Local Plan - [Redacted] RDC
6. Discussion on Co-operation on HRA matters - Suggested by [Redacted] - but is this just a discussion or paper?

One of my colleagues, [Redacted] will be attending to clerk the meeting - but if you can send any papers to me for now - that would be appreciated.

Kind regards

[Redacted]

http://archivesusanger.welbedx.gov.uk/app.aulink/msgid/196c3d-45a3-86b3-7fde-0485f089ad1ce/20/12/2018 16:48:17
Dear [RDC]

I have sent the presentation off to my Portfolio Holder (who is away but receiving emails) so it will be Tuesday 30th at the latest, but I will try to get it to you and other officers earlier.

In terms of attendees, Brighton and Hove and Tunbridge Wells have been sent invitations as well as East Sussex planning authorities. If I recall rightly (but it was some time ago) Brighton and Hove and Tunbridge Wells previously asked to be involved.

Kind regards

[WDC]

---

From: [RDC]
Sent: 23 October 2018 16:44
To: [WDC, RDC]
Cc: [WDC, RDC]

Subject: RE: Agenda for East Sussex Strategy Planning Members Group Meeting - 2 November 2018

[WDC]

Thanks for copying me into the emails with [RDC]

I just have a couple of questions:

Can you please give me a timeline when we (and I assume all the other authorities) will be given a copy of your presentation? Like you I will need to brief me Cabinet Member. Is Tuesday pm ok?

Whilst I appreciate that this is the East Sussex Strategy MG are other relevant authorities invited?

Kind Regards

[RDC]
-----Original Message-----
From: WDC
Sent: 23 October 2018 16:26
To: RDC
Cc: WDC, RDC
Subject: RE: Agenda for East Sussex Strategy Planning Members Group Meeting - 2 November 2018

Hi RDC

I am sorry not to have responded sooner but I have been in and out of meetings today. I have discussed the agenda further with [REDACTED] I suggest we remove agenda item 7 and this can matter can arise from WDC agenda point 3 as it stems from representations received.

I am anticipating undertaking a presentation for agenda point 3. I am happy, after it is agreed by our portfolio holder, to circulate to officers before circulating wider prior to the meeting on the 2nd.

I hope this does not cause any difficulties.

Kind regards

WDC

-----Original Message-----
From: RDC
Sent: 23 October 2018 12:35
To: [REDACTED]
Cc: WDC, RDC
Subject: RE: Agenda for East Sussex Strategy Planning Members Group Meeting - 2 November 2018

WDC RDC

Having spoken to [REDACTED] we think that the suggested item 6 - "Discussion on Cooperation on HRA matters" will already be covered by Item 3, so can omit.

As regards the now proposed "Future Working - Discussion Paper", we are concerned that only receiving this tomorrow will not give enough time for us to consider it properly before the deadline from [REDACTED] Allied to this, I am concerned about putting a report up to this Group without discussing it with colleagues in other Councils first.
Although I raised the matter of looking at future working myself initially, I was thinking of a "heads up" to be considered by the LPMG for presentation to a subsequent meeting - i.e. something that is essentially an information item, rather than a discussion one. If this is what you also have in mind, then perhaps if you could send a draft to all LPMs today, then it would be more inclusive and everyone can say whether they are comfortable with it going forward, albeit time would still be limited to 2 days at most, it seems.

What do you think?

Regards,

[Redacted]  RDC

[Redacted]

Strategy & Planning Service
Rother District Council

[Redacted]

Website www.rother.gov.uk

-----Original Message-----
From: [Redacted]  WDC
Sent: 22 October 2018 17:42
To: [Redacted]  RDC
Cc: [Redacted]  WDC, RDC
Subject: RE: Agenda for East Sussex Strategy Planning Members Group Meeting - 2 November 2018

Hello [Redacted]  RDC

I have had a quick word with [Redacted] about your email.

In terms of the wider topic I was thinking about something very high level (and brief) based on some of the matters that have been raised to us and that we have discussed in the past. For example overlapping HMAs, meeting housing need, reviews of local plans, potential for joint working etc. This can lead to more of an in principle for everyone to work together, whilst acknowledging that it may be wider than just East Sussex depending on location. Any protocols etc. can be something separate and agreed through the local managers/members but gives the group the mandate to start the discussion.

I am happy to circulate the document to you before sending our wider to others and their members (as I say I was thinking for it to be brief).

I appreciate that you are busy, so I will try and write something up on the wider picture for you and send on Wednesday and then a paper to follow on prior to the 2nd.

Kind regards

[Redacted]  WDC

http://archivemanager.wesden.gov.uk/app.html#/message/e3d36de7-f74a-275c-d56a-10cd277a6913/[20/12/2018 10:46:03]
----Original Message-----
From: RDC
Sent: 22 October 2018 15:34
To: WDC, RDC
Cc: Subjects
Subject: RE: Agenda for East Sussex Strategy Planning Members Group Meeting - 2 November 2018

Thanks. I had just noted your email and had a few observations.

As you say, my thinking is indeed to bring the focus back to the opportunity and benefits to the wider area of collaborative working across the board, not limited to the more vexed HRA matters. I saw this as a very much "in principle" heads up, rather than a fully formed paper.

I see that WDC is proposing to cover the wider topic, although I'm not sure to what degree, as it's not something local Plan managers have discussed. I appreciate the offer of prior discussion. We should then share with colleagues so they can brief Members. It may be that the two can be wrapped up together.

Of course, as mentioned, I am on leave next week, so will attend for RDC. He is on leave today, so will discuss papers with him tomorrow. It is likely that we won't be able to prepare anything by Wednesday as I'm busy getting ready for publication of our Local Plan on Friday.

Regards,

RDC

Strategy & Planning Service
Rother District Council

Website www.rother.gov.uk

----Original Message-----
From: WDC
Sent: 22 October 2018 13:19
To: RDC, WDC
Subject: FW: Agenda for East Sussex Strategy Planning Members Group Meeting - 2 November 2018

Hi RDC

I hope you're well.

Apologies that I didn't see the draft agenda before this email was sent. I am wondering if items 6 and 7...
WDC

are really the same thing? From your perspective you may want to lead on the problems up to now and then perhaps can lead on a future working protocol? However, I think you said that you couldn't go to the meeting, so will anyone be attending in your place?

I spoke to last Thursday to give some feedback from our meeting and she agreed to make sure you saw any paper on future working in advance. I will speak to again later today and see when the paper is likely to be ready to circulate.

Regards

WDC

-----Original Message-----
From: WDC
Sent: 22 October 2018 12:53
To: ESCC, RDC, WDC
Subject: Agenda for East Sussex Strategy Planning Members Group Meeting - 2 November 2018

Hello

I’m due to send out the agenda for the East Sussex Strategy Planning Members Group Meeting taking place on 2 November 2018 and would be grateful to receive any papers by 4.30 pm on Wednesday 24th October. Please can you let me know if you are able to send me papers for your item(s) by this time or if they will be ‘to follow’. I’ve attached a previous report that went to the meeting a few years as an example cover report if needed for a template.

The following are the items on the agenda:

1. Apologies for Absence
2. Minutes of Meeting on 8 March 2017
3. Discussion on cross boundary strategic planning matters concerning the Wealden Local Plan - Marina Brigginsshaw
4. Waste and Minerals Plan review - East Sussex County Council - ESCC
5. Rother District Council Development and Site Allocations Local Plan - RDC
6. Discussion on Co-operation on HRA matters - Suggested by RDC - but is this just a discussion or paper?
7. Future Working - Discussion Paper - WDC

One of my colleagues, will be attending to clerk the meeting - but if you can send

http://archivemanager.wealden.gov.uk/app/html#message/e3d33dce7-7d4a-275c-5d6a-10c9777a6f13/20/12/2018 10:46:04]
any papers to me for now - that would be appreciated.

Kind regards

[redacted] WDC
Rother District Council and Wealden District Council  
Duty to Cooperate Meeting  
Draft Minutes

Date: 7th September 2018

Attendees:

1. Plan progress & Timetable

RDC  and  set out their respective local plan programmes.

RDC:

*Development and Site Allocations (DaSA) Local Plan*
- Effectively “part 2”, following on from adoption of the Core Strategy
- Cabinet – 1st October (agenda published 26th September)
- Full Council – 15th October
- Period for Representations – Starting 26th October for six weeks
- Submit to PINS – by 24th January 2019

- Immediate review of the Core Strategy – in parallel with Hastings BC (15 years from date of review adoption – 2036)
- Timetable for Core Strategy review – Regulation 18 consultation – September/October 2019

WDC:

*Wealden Local Plan*
- Proposed Submission version – consultation 13 August - 8 October 2018
- 10 year Plan with caveats (Ashdown Forest – nitrogen deposition, A27 issues and WWTW are trigger points in the Plan under Policy WLP 13, page 73)
- Intends to submit to PINS in December 2018
- Immediate review – although no timetable at the moment
- Potential longer term options in Wealden (as shown in Sustainability Appraisal):
  - Berwick Station
  - West of Hailsham
  - South Hailsham

RDC107
2. Housing Market Area (HMA)

WDC noted that RDC had challenged the inclusion of Rother in the Wealden HMA and explained the view of consultants of the wider area.

RDC explained the background for Rother - RDC part of the Hastings & Rother Housing Market Area. While there was a small shortfall against its need figure, RDC hadn’t asked WDC to take any of their unmet need.

WDC It was agreed that there was little practical effect of the difference of view on the HMA boundaries, as noted that WDC had limited capacity for further growth, only being able to meet its own need. Its Local Plan provides for 950 per annum under the NPPF published in 2012 that will be used for the examination process. (This compares to over 1,000 dwellings under the new (draft) methodology.)

3. Other cross boundary development needs/provisions

Employment

RDC
- Strong retention policy
- In-house employment evidence
- NE Bexhill – 33,500sq.m B1 floorspace

WDC
- Strong retention policy
- Regeneris Consultants developed employment evidence
- A22 Corridor proposal – 22,500sq.m B1,B2,B8 floorspace

No issues were identified.

Retail

RDC
- GVA developing retail evidence
- Verifying proposed convenience retail allocation of 2,000sq.m

WDC
- Carter Jonas developed retail evidence
- Retail provisions are low
- WDC has purchased retail sites in Hailsham Town Centre – looking to regenerate
- To meet retail needs identified in the WLP, the Plan expects to deliver 4,350sq.m of retail floorspace within Uckfield and
Hailsham (combined) with 2,900sq.m being comparison floorspace (policy TC 2, page 123)

No issues were identified.

4. Pevensey Levels and hydrology

**RDC approach**
- Hydrology/water quality – infiltration into the Levels
- Agreed with NE & EA – 2 stages of SuDs treatment

**WDC approach**
- South Wealden Growth Area See policy SWGA7 – Page 138
- Support for SuDS and mitigation of strategic scale

5. Air quality and ecology

RDC will be looking at this in relation to the WLP and commenting on it in their representations, particularly regarding the level of cooperation and due to the Pevensey Levels being partly within Rother District.

WDC are working on the basis that there are no existing issues regarding the Pevensey Levels. WDC advised that as a result of development that it considered that there will be an introduction of nitrogen into the ecosystem/water in the Pevensey Levels. WDC stated that WDC would be in touch to discuss this with RDC to explain. WDC indicated that he would need to take advice on this.

WDC highlighted very recent Advocate General’s advice – Netherlands case – nitrogen deposition and mitigation – which supports WDC position.

WDC explained about the need for mitigation for Ashdown Forest, Lewes Downs and Pevensey Levels sites and that WDC needed to have certainty over this mitigation. Mitigation would take the form of a tariff.

RDC asked to what extent this takes into account commitments in other Local Plans. WDC stated that WDC are not mitigating for other Plans and that WDC alone and in-combination has an impact on air quality. WDC are looking to mitigate for deposition from traffic in respect of Wealden only.

WDC – WDC are not expecting other LPAs to include a tariff – although it is unclear whether Mid Sussex will introduce one in the future review.

RDC asked how does WDC separate out effects to know what their (the Wealden) impact is?
WDC explained the need to monitor and measure (ancillary monitoring). Mitigation measures included reduction in speed limits, electric charging vehicle points, for example. Also, it is working with ESCC as Highway Authority – Low Emission Zones within the Forest may be a possibility.

There was agreement on the benefits of a Shared Nitrogen Action Plan (SNAP) notwithstanding differences of view on the need for mitigation from new development. This had been mooted through the Ashdown Forest Working Group.

RDC explained that RDC are undertaking their HRA presently and would consider the WDC evidence published to date.

6. Cross boundary infrastructure matters

**A27**
- WLP - A27 – references in WLP para 7.14 & Policy INF3, dualling of A27 at Polegate, offline A27 are expected post 2028.
- Policies SWGA3 & SWGA4 are relevant. Policy SWGA4 is effectively a cap policy.
- MB highlighted that NE are likely to raise major concerns with offline A27 improvements due to impact on the South Downs.
- DM highlighted that while expecting to support the proposal in principle, there was a need to consider the knock-on impacts that A27 improvements would have on Bexhill. MB confirmed that she had raised this issue.

**High Speed Rail (HSR) extension**
- Summit due in October
- HSR through route along the Marshlink, now looking as going to Eastbourne, Rother, Hastings and Eastbourne support HSR
- Works are needed to Ashford Station first – technical study ongoing
- Still question marks over what goes into the Franchise as it’s up for renewal

7. Consistency of approaches to common issues, eg the AONB, biodiversity, countryside policies

There was a short discussion on approaches to these similar policies between RDC & WDC policies:
- Net gains in biodiversity
- SAMMS and SANGS
- Green infrastructure
- High Weald AONB
- Employment land policies
- Development in countryside
- Conversion of rural buildings
- Rural economy
• Loss of pubs
• Equestrian
• Affordable housing
• Older People's housing
• Access and space standards
• Self/custom housebuilding
• Gypsies and Travellers – identified two sites (the major site for 18 pitches being WDC owned) to meet need
• Water efficiency
• Housing mix

8. Future Plans and SPDs

RDC
- Local Plan Review starting now

WDC
- Reviewing CIL
- 
  SPDs – Green infrastructure, Rural conversions amongst others

9. Statement of Common Ground

RDC

WDC asked whether RDC would enter into a statement of common ground. did not consider that one would add value at this point it would be appropriate owing to the stage of WLP plan preparation and that RDC responses to the Reg 19 stage would cover relevant issues. It was agreed that there were opportunities in the future to work in relation to reviews of Plans, which would need to be covered by statements of common ground.

10. AORB

No matters raised
RE: Agenda for East Sussex Strategy Planning Members Group Meeting - 2 November 2018

Sent: 24 October 2018 08:19
From: RDC
To: WDC, RDC
CC: 

Thanks WDC

Rother District Council
Town Hall
Bexhill-on-Sea
East Sussex
TN39 3UX
Tel 01424-787651
Fax

----Original Message----
Subject: RE: Agenda for East Sussex Strategy Planning Members Group Meeting - 2 November 2018

Hello all

Just to say I agree that we should remove the "future working - discussion paper" since although the intention is there, we don't have time to write one and then get it considered by other Planning Policy managers before the meeting. I think it is enough to raise the principle, which we can do under presentation for item 3, and then move forward with a more detailed proposal in due course.

I know she has sent a separate email about the timeline for you seeing the presentation.

Hope this resolves matters.

Regards

WDC

----Original Message----
Subject: RE: Agenda for East Sussex Strategy Planning Members Group Meeting - 2 November 2018

I am sorry not to have responded sooner but I have been in and out of meetings today. I have discussed the agenda further with WDC. I suggest we remove agenda item 7 and this can matter can arise from WDC agenda point 3 as it stems from representations received.

http://archivemanager.wealden.gov.uk/app.html#/message/cc6a7d55-fbd0-023a-9d88-6d2c8755d7cc/[20/12/2018 10:44:43]
I am anticipating undertaking a presentation for agenda point 3. I am happy, after it is agreed by our portfolio holder, to circulate to officers before circulating wider prior to the meeting on the 2nd.

I hope this does not cause any difficulties.

Kind regards

---- Original Message ----

From: [Redacted]
To: [Redacted]
Cc: [Redacted]
Subject: RE: Agenda for East Sussex Strategy Planning Members Group Meeting - 2 November 2018

Having spoken to [Redacted] we think that the suggested item 6 - "Discussion on Cooperation on HRA matters" will already be covered by Item 3, so can omit.

As regards the now proposed "Future Working - Discussion Paper", we are concerned that only receiving this tomorrow will not give enough time for us to consider it properly before the deadline from [Redacted]. Allied to this, I am concerned about putting a report up to this Group without discussing it with colleagues in other Councils first.

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What do you think?

Regards,

[Redacted]

Strategy & Planning Service
Rother District Council

Website www.rother.gov.uk

---- Original Message ----

From: [Redacted]
Sent: 22 October 2018 17:42
To: [Redacted]
Cc: [Redacted]
Subject: RE: Agenda for East Sussex Strategy Planning Members Group Meeting - 2 November 2018

Hello [Redacted] [Redacted]

I have had a quick word with [Redacted] about your email.

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I appreciate that you are busy, so I will try and write something up on the wider picture for you and send on Wednesday and then a paper to follow on prior to the 2nd.

Kind regards

[Redacted]
Hi WDC

Thank you, that is fine with me.

Kind regards

RDC

From: RDC
Sent: 26 October 2018 11:27
To: WDC
Cc: RDC
Subject: RE: Draft DtC Minutes - RDC & WDC - September 2018

Hi WDC

We’ve gone through the proposed amendments to the minutes and made one small tweak to item 9 – please see attached.

Could you let me know by return that you are content with the minutes please?

Kind regards

RDC

http://archivemanager.wealden.gov.uk/app.html/message/7886091d-1ab1-3850-27f-3e0ec1773bb/[20/12/2018 10:40:54]
Planning Strategy
Rother District Council
Town Hall
Bexhill-on-Sea
East Sussex
TN39 3JX

Web: www.rother.gov.uk

From: WDC
Sent: 18 October 2018 17:40
To: RDC
Cc: RDC
Subject: RE: Draft DtC Minutes - RDC & WDC - September 2018

Hi RDC

I hope that you and RDC have had a rest after pulling the Rother Plan together.

Please find attached our comments (in the form of tracked changes) to the minutes and thank you for writing the minutes in the first instance.

Kind regards

WDC

From: RDC
Sent: 08 October 2018 14:30
To: WDC
Cc: RDC
Subject: Draft DtC Minutes - RDC & WDC - September 2018

Hi WDC

Please see the attached draft minutes from our DtC meeting in September for your consideration and comment. Apologies for the time taken to draft the meeting note but you’ll appreciate the background preparation we’ve been undertaking in getting the DaSA ready for Cabinet and Full Council.

If you able to look through the minutes and provide any comments to us by 19th October, I would be grateful.

Kind regards

RDC

Planning Strategy
Rother District Council
Town Hall
Bexhill-on-Sea
East Sussex
TN39 3JX

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Image removed by sender.
Dear RDC

Update on Wealden’s Duty to Co-operate

Further to your representations on the Proposed Submission Wealden Local Plan, received in October, I am writing to request that you write an update letter which I can pass on to the Inspector at the time of submission which will be on 11 January 2019.

Your representations said that Wealden District Council had failed on the Duty to Co-operate which is required by the NPPF in its preparation of the Local Plan. The Council intends to defend its’ position on this at Examination and is currently compiling the evidence of communication between local authorities in this regard. Notwithstanding this, we take the relationships between local authorities very seriously and have taken several actions to prove our on-going co-operation in recent weeks as follows:

1. Withdrawal of objection to the South Downs National Park Local Plan on 29th October 2018 before the hearing sessions in November.

2. Draft Memorandum of Understanding with Eastbourne Borough Council is being discussed in December 2018.

3. Consideration and draft agreement to accept undersupply of Gypsy and Travellers sites from Lewes District Council in December 2018.

4. Reply to Tunbridge Wells Borough Council’s consultants queries in December 2018.

5. Meeting with Rother District Council to further consider air quality and hydrology on the Pevensey Levels.

7. Meeting of Strategic Planning Group took place on 2nd November involving officers and elected members from East Sussex District and Boroughs, Mid Sussex District Council and Tunbridge Wells Borough Council and East Sussex County Council.

As you will be aware Duty to Cooperate is about engagement and not necessarily a duty to agree. In view of all the above activity and other numerous informal conversations between officers and members over the past few months it would be appreciated if you would inform the Inspector that you are withdrawing your comments and confirm that Wealden District Council is meeting the Duty to Co-operate.

Regards

Yours sincerely

[Redacted]

WDC

[Redacted]

Planning, Policy & Environmental Services

cc: [Redacted], RDC
Hi

Thanks again for sending on the notes. Both Marina and myself have made a couple of suggestions in tracked changes, please see attached.

If you are happy with these changes I would be very grateful if you could let me know and send a final version back to us by tomorrow. We are putting together a pack of papers for our Duty to Co-operate background paper for the submission of the WLP and we would like to include these notes. We intend to submit on Friday 18th.

Many thanks and kind regards

Isabel

Isabel Garden
Director of Planning, Policy and Environmental Services
Wealden District Council