Examination of Wealden Local Plan

Dandara Ltd Hearing Statement for Matter 2: Vision and Objectives and Local Plan Growth

1.1 This Hearing Statement has been prepared by Dandara Ltd in response to the MIQs raised by the Inspector for Matters to be discussed in weeks one and two during 21st to 30th May 2019. This Hearing Statement should be read alongside Dandara Ltd’s representations to the 2018 Submission Version Wealden Local Plan (Regulation 19).

1.2 This Statement will only address MIQs that relate to Dandara Ltd’s representations to the Regulation 19 Plan with specific focus on Matter 2, Issue 1 - Whether the Spatial Vision for Wealden is justified, effective, consistent with national policy and positively prepared.

1.3 It should be noted that Dandara Ltd is a member of the Ashdown Forest Stakeholder Forum (AFSF). Separate Hearing Statements have been prepared and submitted by Savills on behalf of the AFSF. This Hearing Statement does not therefore seek to replicate the representations made on Dandara’s behalf in the AFSF’s Statements but provides supplementary responses to the MIQs in relation to Dandara Ltd’s specific concerns.

Issue 1: Whether the Spatial Vision for Wealden is justified, effective, consistent with national policy and positively prepared?

Question 32 and 33

1.4 The key local plan objectives set out within the WDP are considered to have an over-arching relevance, however they are not considered to be justified, effective or consistent within national policy nor demonstrate that the Plan has been positively prepared.

1.5 Our Regulation 19 representations detailed that the proposed housing distribution strategy was not justified as being the most appropriate strategy, being contrary to the promotion of sustainable development and the settlement hierarchy identified within the WDP. References are made throughout the WDP which highlight that residents rely on Tunbridge Wells for a range of activities including employment, health facilities, recreation and leisure resulting in strong migration flows between Wealden district and Tunbridge Wells. As detailed within our Regulation 19 representations, despite this strong inter-dependant relationship only 0.7% of the total housing/windfall allowance lies within the output areas adjacent to Tunbridge Wells and only 25% of the total new homes within the north of District, despite this area being the location of the main towns of Tunbridge Wells, Crowborough, Uckfield and Heathfield.

1.6 The Vision for the District within Section 4 of the WDP refers to meeting housing in the right locations and continues that development will take place across the district, and in particular south Wealden. Whilst development will take place across the district, as currently proposed by the WLP, it is not distributed either fairly or consistently with the strong inter-dependant relationships and migration flows identified with other settlements, specifically Tunbridge
Wells as the regional centre The WDP does not therefore promote sustainable development and cannot be concluded to be justified, effective or consistent with national policy.

1.7 It has been detailed within our Matter 1 Statement that the Sustainability Appraisal (SA) has failed to consider all reasonable alternatives in respect of locating development in a variety of locations. Despite the acknowledgement of the strong dependency of the district to Tunbridge Wells for a number of functions, the WDP and accompanying SA has failed to give any consideration to a spatial strategy which is not heavily weighted to the south of the district, when limiting housing growth within the north of the district will clearly reinforce unsustainable commuting patterns. Rather than consider a more balanced distribution of housing development or even test this as a reasonable alternative, the WDP instead seeks to support the reinstatement and upgrading of railway lines which include the main settlements of Lewes, Uckbridge, Crowborough and Tunbridge Wells as part of the air quality mitigation strategy set out in Policy AF2. Given such infrastructure delivery cannot be guaranteed or relied upon, it clearly demonstrates an unjustified and ineffective approach to the delivery of sustainable development nor would it effectively address the identified strong migration flows.

1.8 It cannot therefore be concluded that that the Vision for the District is justified or effective as the evidence base to which it relates has not properly considered what are the ‘right the locations’ nor addressed how development could be effectively delivered in the right location. Instead the WDP is based on the predetermination that the south of the District is the ‘right’ location for development.

1.9 The WDP plan period is not consistent with national policy given that the Framework sets out a 15 year period a Para. 157 yet the Plan period is only to 2028. The WDP states a shorter plan period is necessary as development beyond 2028 would exceed the critical load of nitrogen for the Ashdown Forest. Given it will be necessary to plan for development requirements beyond 2028, this clearly demonstrates that the Plan period is not effective or justified.