Summary of Individual Representations made in accordance with Regulation 28(2) in order of the Proposed Submission Core Strategy.
Details of Reasons for Soundness/ Legal Compliance:
The current proposed submission of the Core Strategy does not clarify the amount of convenience and comparison floorspace to be delivered in Uckfield through future retail and town centre development.

Details of Changes to be Made:
Suggested revised wording for Para. 6.11 to clarify future convenience and comparison floorspace provision in Uckfield. Supporting the sensitive redevelopment and expansion of the town centre, including additional retail floorspace of around 10,707 sqm net retail floorspace (convenience and comparison) as part of a comprehensive masterplan scheme of future retail developments and improvements which will increase the attractiveness of Uckfield and help create a vibrant and inclusive town centre.
Representation ID
6
Person ID Miss Bust
Agent ID
170873
The Coal Authority
Proposed Submission
Core Strategy
Sound ☐ Yes ☐ No ☐ Justified ☐ Effective ☐ Consistent with national policy
Legally Compliant ☐ Yes ☐ No
Details of Reasons for Soundess/ Legal Complaince:

Details of Changes to be Made:

Representation ID
8
Person ID ms Hutchison
Agent ID
504595
Proposed Submission
Core Strategy
Sound ☑ Yes ☐ No ☐ Justified ☐ Effective ☐ Consistent with national policy
Legally Compliant ☑ Yes ☐ No
Details of Reasons for Soundess/ Legal Complaince:

Details of Changes to be Made:

Representation ID
12
Person ID Dr Ince
Agent ID
507857
Proposed Submission
Core Strategy
Sound ☑ Yes ☐ No ☐ Justified ☐ Effective ☐ Consistent with national policy
Legally Compliant ☑ Yes ☐ No
Details of Reasons for Soundess/ Legal Complaince:
I am not qualified to state the strategy us either Legally compliant or Sound. thus there should be a don't know option.
Details of Changes to be Made:
There is a reference to a possibility of housing North West of Crowborough but it is not clear what area is considered. If this is the area next to the swimming pool I am not sure this is North West. Perhaps this should be made clear. The document makes claims for 400 houses per year but indicates that there would not be any increase in the population without immigration. The document makes claims for sustainability, carbon footprint and biodiversity but fails to mention that the major influence on these is population. While accepting politicians only deal with easy issues is nobody of the view that perhaps we need to encourage a lower regional, national and world population before man is the only animal left on the planet.
### Representation ID 14

**Person ID** Mr Dove  
**Agent ID**

509079

Proposed Submission  
Core Strategy

- **Sound**: Yes  
- **Legally Compliant**: Yes

**Details of Reasons for Soundess/ Legal Complaince:**

There needs to be another box to indicate "unfinished". Having set out the proposal to build 1000 dwellings in Uckfield, there is an ideal site for a sustainable urban extension. The site is assessed in WDC’s recent Strategic Housing Land Availability Assessment (SHLAA) as suitable, available and economically viable (achievable) with a total net dwelling capacity of 35 and I would suggest that it is brought within the development boundary for the council’s reasons given in the SHLAA Site Reference: 290/1990 Settlement: Five Ash Down Address: Land adjacent to Pine Cottage, Coopers Green Submitted site area (ha): 1.47 Indicative developable area (ha): 1.00

**Details of Changes to be Made:**

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### Representation ID 21

**Person ID** Llinkaia  
**Agent ID**

104861  
Transport for London

Proposed Submission  
Core Strategy

- **Sound**: Yes
- **Legally Compliant**: Yes

**Details of Reasons for Soundess/ Legal Complaince:**

**Details of Changes to be Made:**

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### Representation ID 22

**Person ID** Doherty  
**Agent ID**

104888  
Civil Aviation Authority

Proposed Submission  
Core Strategy

- **Sound**: Yes
- **Legally Compliant**: Yes

**Details of Reasons for Soundess/ Legal Complaince:**

**Details of Changes to be Made:**
Representation ID
23

Person ID  
Mr Wade  
512005

Agent ID  
MR WADE  
511988

SUSSEX COUNTY PLAYING FIELDS ASSOCIATION

Proposed Submission
Core Strategy

Sound  
☐ Yes  
☒ No  
☐ Justified  
☐ Effective  
☑ Consistent with national policy

Legally Compliant  
☑ Yes  
☐ No

Details of Reasons for Soundness/ Legal Complaince:
FAILS TO MEET GUIDANCE IN PPG 17 - "PLANNING FOR OPEN SPACE, SPORT AND RECREATION". PROPOSED HOUSING SITE SD4 (POLEGATE/WILLINGDON) WOULD LEAD TO A LOSS OF PLAYING FIELDS. UNLESS AND UNTIL THE COUNCIL HAS UNDERTAKEN THE THE ROBUST ASSESSMENT OF THE EXISTING AND FUTURE NEEDS OF THEIR COMMUNITIES FOR OPEN SPACE, SPORTS AND RECREATIONAL FACILITIES AS REQUIRED UNDER PARA. 1 OF PPG17, THEN IT IS PREMATURE TO CONSIDER ALLOCATING SITE SD4 FOR HOUSING. PARA. 15 OF PPG17 ALSO STATES THAT IN ADVANCE OF AN ASSESSMENT OF NEED, PLANNING PERMISSION SHOULD NOT BE GRANTED FOR DEVELOPMENT ON PLAYING FIELDS AND THAT, EVEN IF SUCH PLAYING FIELDS ARE TO BE LOST, THEY NEED TO BE REPLACED BY PLAYING FIELDS OF EQUIVALENT OR BETTER QUALITY AND IN A SUITABLE LOCATION. THE COUNCIL HAVE NOT UNDERTAKEN THIS ASSESSMENT, NOR IDENTIFIED ALTERNATIVE PROVISION, THUS THEY ARE "PUTTING THE CART BEFORE THE HORSE" IN PREMATURELY ALOCATING SITE SD4 FOR ANOTHER USE, CONTRARY TO PPG 17 OBJECTIVES AND GOVERNMENT GUIDANCE. THE NEED FOR THE RETENTION/REPLACEMENT OF EXISTING PLAYING FIELDS SHOULD BE ASSESSED AS PART OF DEVELOPMENT PLAN POLICY AND AS PART OF THE LDF BEFORE ANY ALTERNATIVE USE ALLOCATION CAN BE CONSIDERED. THERE IS ALSO NO EVIDENCE THAT THE COUNCIL HAS CONSULTED SPORT ENGLAND ABOUT DEVELOPMENT THAT AFFECTS LAND USED AS PLAYING FIELDS, AS REQUIRED UNDER STATUTORY INSTRUMENT 1996 NO. 1817.

Details of Changes to be Made:
DELETION OF SITE SD4 FROM CORE STRATEGY

Representation ID
30

Person ID  
Dr Dove  
509187

Proposed Submission
Core Strategy

Sound  
☑ Yes  
☐ No  
☐ Justified  
☐ Effective  
☐ Consistent with national policy

Legally Compliant  
☑ Yes  
☐ No

Details of Reasons for Soundess/ Legal Complaince:

Details of Changes to be Made:
Site Reference: 290/1990 Settlement: Five Ash Down Address: Land adjacent to Pine Cottage, Coopers Green Submitted site area (ha): 1.47 Indicative developable area (ha): 1.00 The site is assessed in WDC's recent Strategic Housing Land Availability Assessment (SHLAA) as suitable, available and economically viable (achievable) with a total net dwelling capacity of 35 and I would suggest that it is brought within the development boundary for the council's reasons given in the SHLAA
Details of Reasons for Soundness/ Legal Complaince:
The Decentralisation and Localisation Bill sweeps away the need to comply with the top down housing targets imposed by New Labour and its unloved and undemocratic love-child SEERA. In short, the South East Plan is dead!. Wealden District Council's 'consultation process', started in 2007, only presented respondents with a 'choice' of where to place the blocks of housing demanded by the South East Plan. I trust that the Planning Inspector will therefore take the view that Wealden District Council's consultation process now has no validity.

Details of Changes to be Made:
I hope that a Public Inquiry will insist that WDC seek a valid public mandate for both the number of houses that insists are required and where they are to be placed. It should at least address the need for WDC to undertake a genuine analysis of local housing needs. By way of explanation take, for example, Hailsham which expanded from 8000 souls to around 20,000 in the years between 1960 and 2000, It has an adequate supply of family housing in a good state of repair. I know that there has been no genuine demographic analysis of housing use in Hailsham or indeed the rest of the towns of the Low Weald. It seems to me to be reasonable to suggest that many of these family homes will be recycled as families go through the normal cycle of 'hatching, despatching, retirement and death'. Is there, therefore, any need or any justification for more housing in Hailsham that cannot be matched with new job opportunities? A cornerstone of any housing strategy is sustainability, indeed , the reams of paper produced by WDC proclaim it's importance. How can building further houses in Hailsham be a sustainable option? Any economically active newcomers will have to commute to work in other places in the district or even beyond. Any planning process should give some consideration to present conditions and a reasonably predicatable future. Is it unreasonable to suggest that the many workers in the UK will find it increasingly difficult to afford to commute using 'the car'? Future home buyers in Hailsham may, in quite short order, find themselves trapped in Hailsham and unable to travel any distance to the workplace. The Decentralisation and Localisation Bill invisages active collaboration with 'adjacent' planning authorities. WDC have no demonstrable history of collaboration with Eastbourne Borough in regard to housing targets, This is somewhat strange as both recognise the connectivity issues of Eastbourne, Polegate and Hailsham. This is particularly unfortunate as Wealden insists that greenfield sites will play a significant part in housing provision from 2016 and will by 2022 be the only choice of housing sites. I believe that the Planning Inspector will need to be convinced that there are no brownfield sites available in the older and well established towns such as Eastbourne before rubber-stamping greenfield sites. I trust that the allocation of greenfield sites for housing will continue to be, as a national policy, a last resort that requires a justification of significant and demonstrable merit. I believe that the Planning Inspector will find that the increasing allocation, in the WDC plans, of greenfield sites has neither justification or merit.
Details of Reasons for Soundess/ Legal Complaince:
The Core Strategy basically states continuation and catchment. I assume the best for Wealden and that means 21c measures to face the Truth of Human Dilemmas we all face therefore any builds should depend on self producing sustainabilities for heat, waste, garbage disposal and off road parking. This may send the right message to all now well off the beaten tracks of any reality. Incineration in all material which simultaneously produces heat for water etc cannot go amiss for a species destroying its lease on life and all creation which took much longer to develope. The prospects of being swept away by delicately balanced planetary platforms running amock - or nuclear wars must be faces as on the planets own defence mechanisms. Wind farms would end up at the bottom of the sea to land on shores drifted in a past we cannot relate to as future! Nuke stations must have fail safe 'sprinklers' etc etc etc only solar power and incineration can balance its creation.

Details of Changes to be Made:

Details of Reasons for Soundess/ Legal Complaince:
Additional Policy: Sustainable Travel Eastbourne Borough Council supports the inclusion of an additional policy in the Core Strategy relating to sustainable travel and specifically the inclusion of a new railway station at Stone Cross on the border of Eastbourne and Wealden. Paragraphs 6.17 of Background Paper BP1: Development of the Proposed Submission Core Strategy acknowledges that the “South Wealden and Eastbourne Transport Study shows that future development in the south Wealden area will require investment into transport infrastructure, in order to mitigate the potential impact of additional vehicle movements created by additional development”. Background Paper BP11: Infrastructure Delivery Plan, provides further clarification on the type of transport infrastructure required but does not refer to the provision of the new railway station at Stone Cross (on the border or South Wealden/Eastbourne), which is included in the Eastbourne Plan: Proposed Core Strategy 2006-2027) and is strongly supported by Eastbourne Borough Council. Given that part of the proposed new railway station would be within Wealden, and considering its potential to provide sustainable travel for Stone Cross’ existing residents and new residents of the proposed urban extensions, it should be referred to in the Infrastructure Delivery Plan (IDP). In addition to the inclusion of Stone Cross railway station in the IDP, a policy on transport infrastructure should be included within the Core Strategy identifying sustainable travel improvements to support the new developments. This policy should make specific reference to the provision of a new railway station at Stone Cross. Finally, the Council welcomes Wealden District Council’s decision to exclude “the reinstatement of the Willingdon Chord” from its Infrastructure Delivery Plan on the basis that it is “unlikely to be delivered within the Core Strategy timeframe (2006 - 2030) and [is] not critical to growth proposed within the Proposed Submission Core Strategy” (BP11: paragraph 4.12). East Sussex County Council’s inclusion of the Willingdon Chord within its Third Local Transport Plan would enable rail services along to Coastway Line to bypass Eastbourne leading to a potential degradation in the frequency of rail services to Hampden Park and Eastbourne railway stations.

Details of Changes to be Made:
Dear Sir,

We are writing in support of Strategic Development Area SD4 which we believe represents an appropriate area in planning and community terms for a sustainable urban extension to the Polegate / Willingdon area. We are first and foremost a local family whose history is rooted in this area and we have worked and owned agricultural land here at Mornings Mill Farm for many generations. We believe that this ownership carries with it some real responsibility. We are committed to improving this area in any way that we can and would take great pride in being part of a development that we can influence and participate in. We will continue to live on the farm and to conduct a business on the remaining acreage. So for us, this is not just about doing something acceptable for the area but rather doing something worthwhile and valuable, remarkable even. We feel a strong responsibility to make sure that this happens and in particular we would like to create more housing for local people and have an influence on the commercial growth and overall enjoyment of the area by the people that live here, including ourselves. We are not experts in large housing developments but we do have some sense of the scope of the task that may lie ahead and we are local business people with a passion for the area. We very much hope that this means we can have a useful role in this project. We understand the importance of working with the local community, Local Councils and adjoining landowners to establish the objectives for building up proposals for the development of the area and ensuring the right mix of land uses. In overall terms, we firmly believe that Polegate is a suitable and very sustainable location for growth; indeed it is one of the areas recognised and put forward in the South East Regional Plan. Turning to the broad Strategic Development Area SD4, we believe development here could be well integrated into the Polegate / Willingdon area. Development would have a limited visual impact being seen against the backdrop of the surrounding built up areas. Being to the east of the town, it would have a minimal visual impact on the South Downs National Park compared with land to the west or north of Polegate. In terms of sustainability, the urban extension in SD4 would provide very good accessibility for residents to Polegate town centre and to the railway station by walking, cycling or taking the bus. Residents could also gain the wider range of services and facilities at Eastbourne by taking the bus. This is recognised by Wealden Council which is promoting the Eastbourne / Hailsham Quality Bus Corridor. We are aware the local community would wish to retain the character of an open frontage to the old Eastbourne Road (A 2270); this is an objective we share and is supported by Polegate Town Council and Willingdon and Jevington Parish Council. The Council also state the need to retain playing fields or relocate them to a well drained location. Again this is supported by the Local Councils and we agree with this objective for the benefit of the community, subject to an assessment of need with all the parties involved. New informal open spaces would also provide opportunities for nature conservation. Strategic Development Area SD4 includes 700 dwellings, 8600 sq. metres of employment floorspace, the probable need for a new primary School site, community uses and the open spaces referred to above. It seems to us that this urban extension will require a considerable amount of land in order to properly accommodate all the proposed uses put forward by Wealden Council and the local community. Whilst we appreciate the area shown in Figure 8 of the Submission Document is only a broad indication at this time, we would like to say that further land to the east of that area within Mornings Mill Farm could be made available if necessary. We are aware that housebuilders and landowners have previously put forward other areas for development to the west and north of Polegate. While the urban expansion proposed in SD4 is contained by surrounding existing development, we consider that building on the land to west of Polegate would create significant visual intrusion into an open landscape and have a detrimental affect on the South Downs National Park. A similar view is expressed by Wealden Council in paragraph 6.27 of the Submission Document. Development on land to the north would also be exposed to the north and hard against the Pevensey By Pass. Consequently we find these other locations in the Polegate / Willingdon area objectionable from a planning perspective and should they be submitted as alternatives to SD4, we would wish for the opportunity to make representations on them at the Examination in order to help the Inspector come to his or her conclusions.

Yours sincerely,

David and Eileen Vine
Details of Reasons for Soundness/ Legal Compliance:

Thank you for consulting Lewes District Council on the above document. Lewes District Council supports the distribution of development set out in the Proposed Submission Core Strategy and does not consider it necessary to submit a formal representation in respect of soundness or legal compliance. The District Council particularly welcomes the recognition of the need for appropriate mitigation and avoidance measures to ensure that future housing and employment development in Uckfield is not subject to flood risk and will not exacerbate flood risk elsewhere, and also the precautionary approach taken in respect of the potential impact on the Lewes Downs Special Area of Conservation from the proposed housing growth at Uckfield and Crowborough. Lewes District Council does have some concerns about the impact of this growth on the capacity and safety of the A26 and A272 and their associated junctions. Lewes District Council is aware that further transport evidence is being prepared with regards to the proposed strategic development area to the west of Uckfield. Through its discussions with ESCC, the District Council is under the impression that through this transport work it will be possible to establish the potential impact upon the A26 and A272 in Lewes District. If ESCC establish that the proposed strategic development would create an unacceptable impact on either road, including its junctions in both Wealden and Lewes District Council areas, Lewes District Council wish to seek assurances that appropriate mitigation measures are identified and agreed with ESCC, in consultation with both District Councils. This will include identifying how these mitigation measures will be secured. It may be that development proposed through the emerging Lewes District Core Strategy will also need to mitigate potential impact on the highway network. If the mitigation measures are the same as that required for the Uckfield development, a way of apportioning the cost of implementing the measure(s) will need to be agreed by both ESCC and the two District Councils. For all other proposed strategic development areas, the District Council assumes that ESCC, as the local highway authority, is confident that a sufficient level of analysis has been undertaken to understand the potential transport impact of the proposed spatial strategy on the highway network beyond the Wealden boundary, and does not consider that mitigation measures on these roads are critical to the delivery if the proposed housing and employment growth. If any mitigation measures are required to be delivered in Lewes District, then the Council wishes to re-iterate the points highlighted in the previous paragraph. The District Council looks forward to continuing its strong working relationship with Wealden District Council in order to further strengthen links between the two areas and address cross-boundary issues in partnership.

Details of Changes to be Made:

Yes  Sound  No  Justified  Effective  Consistent with national policy

Legally Compliant  Yes  No
Details of Reasons for Soundness/ Legal Compliance:

1. The Core Strategy is not legally compliant and is unsound because of its proposals for an urban extension to the north west of Heathfield (Strategic Development Area SD11). 2. Whilst the principle of accommodating housing growth in the broad location of north west Heathfield is supported, the Core Strategy’s proposals are deficient because they: (a) fail to take a comprehensive approach to the development of this area and so are not founded on a robust and credible evidence base and are not the most appropriate strategy when considered against the reasonable alternatives in this location, thus failing the soundness test in paragraph 4.36 of PPS12 that they are “justifiable”. (b) constitute an unjustified encroachment into the High Weald AONB and so are not the most appropriate strategy when considered against the reasonable alternatives in this location, thus failing the same “justifiable” test in PPS12 and also the soundness test in paragraph 4.52 of PPS12 that they are “consistent with national policy”. Paragraph 16(v) of PPS7 requires the Council in preparing the Core Strategy to “conserve…sites of landscape…value, in accordance with statutory designations”. Paragraph 22(ii) of PPS7 requires that “major developments” should only take place within the AONB after “the most rigorous examination” and an assessment of “the scope for developing elsewhere outside the designated area or meeting the need for it in some other way”. The Council has failed to properly assess the scope for meeting the need for development on previously developed land at north west Heathfield that is not in the AONB. (c) utilise less accessible and less sustainable land and so are not the most appropriate strategy when considered against reasonable alternatives in this location, thus failing the same “justifiable” test in PPS12. (d) fail to provide adequate safeguarding of amenities of existing dwellings (if those dwellings are to be excluded from the urban extension as currently proposed) and fail to integrate into the existing urban form, thus failing the soundness test in paragraph 4.52 of PPS12 that the proposals are consistent with national policy. Paragraph 34 of PPS1 and paragraph 13 of PPS3 require the Council to reject design which is “inappropriate in its context” and paragraph 35 of PPS1 requires development to be designed so that it will be “integrated into the existing urban form and the natural and built environments”. THE PROPOSED SUBMISSION CORE STRATEGY 3. We object to the following parts of the Core Strategy. Because the objections are interconnected, we have set out all the relevant matters in this response, although this particular objection only relates to the specific part of the Core Strategy identified in our response to Q1 above. Our objections are as follows: (i) The omission from Spatial Planning Objective SPO1 of any reference to minimising the loss of nationally designated landscapes, including the High Weald AONB. Paragraph 16(v) of PPS7 requires the Council to conserve the AONB and since it is clear that the Council is proposing to meet part of the District’s development needs by using land within the AONB, the Council should establish a clear objective that only the minimum AONB land should be used for this purpose and wherever possible non-AONB land should be used in preference. (ii) The reference in Policy WCS2 to the broad locations for housing development being shown as insets on the Key Diagram. We object to the inset for Heathfield in relation to the way it shows the proposal SD11 and consequently object to this reference to that inset plan in Policy WCS2. (iii) The reference in Policy WCS4 to SD11: Land at North West of Heathfield. We object to the way that SD11 is described in Chapter 6 of the Core Strategy and shown on the Key Diagram and as a result object to the reference to SD11 in Policy WCS4. (iv) The omission from paragraph 5.8 of any aim to maximise the use of previously developed land in meeting existing and future housing needs. Notwithstanding the recent changes to PPS3 it remains a national objective to prioritise the use of previously developed land, in accordance with paragraph 21 of PPS1 and paragraph 40 of PPS3. (v) The reference in paragraph 6.40 to the identification of potential sites for housing “through the SHLAA”. We object to the inclusion of Site 155/1210 in its current form as shown in the SHLAA and consequently object to this reference to that site in paragraph 6.40. (vi) The reference in paragraph 6.41 to the “most suitable location” being “within the AONB” and that this land could be developed “without strategic adverse impact on the landscape”. The Council’s evidence base does not demonstrate that the land within the AONB is more suitable for development than the non-AONB previously developed land on High Street. There is no assessment by the Council of the suitability of this non-AONB land (which includes the objector’s land at Lavender Cottage, High Street, Heathfield, TN21 0UP) and yet it is more suitable than the AONB land, being (i) not subject to a national landscape designation, (ii) previously developed land, (iii) within the existing settlement boundary, and (iv) well related and integrated into the urban area and existing transport connections. In addition, the Council’s evidence base does not show that 160 dwellings can be provided in the AONB without strategic adverse impact on the landscape. The capacity of 160 dwellings for SD11 would appear to derive from the assumed capacity of 2 adjacent SHLAA sites at north west Heathfield (Site 155/1210 with a capacity of 123 dwellings at 40 dh and Site 307/1210 with a capacity of 35 dwellings at 35
The Council's Landscape Character Assessment (February 2009) shows at Figure 5 that large parts of these SHLAA sites are required to be retained as open space to provide a "landscape buffer" to Tilsmore Wood. If those buffers are to be provided as recommended in the Landscape Character Assessment, the SHLAA sites will not be able to deliver the required capacity, without radical changes to the assumed density, and there has been no assessment of the impact of higher density development on the AONB and on the landscape setting and character of Tilsmore Wood. The claim therefore that SD11 can be achieved without strategic adverse impact on the AONB is not supported by the evidence base. (vii) The reference in paragraph 6.41 to the release of AONB land being justified "as no suitable alternative non-AONB location exists". The Council's evidence base does not substantiate this assertion. The Council has not assessed the suitability of the non-AONB land in this location which fronts High Street (including the objectors' land at Lavender Cottage). This non-AONB land is within the settlement limits of Heathfield as identified on the Proposals Map of the saved Local Plan and paragraph 6.48 of the Core Strategy confirms that within development boundaries "the principle of development is acceptable". The principle of redeveloping this land to provide more intensive residential development has already been accepted by the Council, with the grant of planning permissions at Brackenside (WD/08/0329) for 3 dwellings in place of 1 dwelling, and at Oaksdown/Lowlands (WD/2011/0400) for 9 apartments in the place of 2 dwellings. The more intensive development of the non-AONB land on the High Street frontage would minimise (or may even remove) the need for the use of AONB land. This option would plainly be a more suitable alternative than the use only of land "within the AONB" as proposed in the Core Strategy. (viii) The reference in paragraph 6.41 to "no suitable alternative contingency land is available". The land at Oaksdown/Lowlands is available for development (as confirmed by the recent renewal of planning permission). The objectors' land at Lavender Cottage is available for development (and this has been made known to the Council since at least August 2010). The land at Woodhatch is relied on as being available for development in order to provide the access for SHLAA site 155/1210. The objectors understand that the land at Holmhurst could be made available for development. Thus, there is a continuous frontage of 5 plots of non-AONB land available (all with generous areas of garden land, most of which is excluded from the AONB) just on this part of the High Street. Were the Council to actively promote a comprehensive redevelopment of the area it is likely that other land in the vicinity would be made available. However, the Council has simply failed in its evidence base to assess this option. If it is necessary to identify contingency land then the hinterland of AONB land should be identified as contingency land, with priority being given to the development of the non-AONB land on the High Street frontage. Prioritising that land would be consistent with the policy objectives of minimising the loss of AONB land and maximising the use of previously developed land. (ix) The reference in paragraph 6.42 item 3 to SD11 being "on land adjacent to the urban area". The proposal for SD11 should not be defined in a way which excludes the urban area and which focuses only on land within the AONB. The proposal should embrace the urban area and the development should maximise the use of previously developed land in the urban area to achieve the provision of 160 dwellings before any consideration is given to the use of land in the AONB. (x) Figure 10 Heathfield Area Strategy. This diagram shows SD11 as located within the AONB and beyond the existing settlement. The diagram should not exclude the inclusion of the existing built up area in this location within the scope of SD11. The built up area has the potential and the capacity to be redeveloped and this aim should be the first priority at north west Heathfield. (xi) Key Diagram: the inset for Heathfield. The inset shows Heathfield and Proposal SD11 in the same way that they are shown on Figure 10 and they are not acceptable for the same reason set out at (x) above. 4. We now propose to elaborate on these objections. Piecemeal not comprehensive 5. SD11 takes an opportunistic approach. It utilises substantial areas of greenfield land as the main development areas (and by implication from the SHLAA one existing property simply as a means of access). Although the SHLAA indicates that Site 155/1210 is in multiple ownerships and Site 307/1210 is owned by a company with 7 shareholders, the choice of this location seems to be influenced simply by the fact that these 2 sites were promoted in the SHLAA and so it is assumed they are available. Site 155/1210 is said to be under the control of a housing developer. We are not aware whether the Council has seen the terms of any option or other legal agreement giving such control but, given that the Proposed Submission Core Strategy is a long term strategy to 2030 and its trajectory does not anticipate the site coming forward before 2015/16, little weight can be given to the status of any current contractual arrangements. 6. Any sensible spatial planning approach to the development of this area would not look at the sites promoted in the SHLAA in isolation but would look to see how that development would relate to its local context and how it would relate to the settlement it is intended to form a part of. 7. The site of SD11 is on sloping ground set back behind existing development which separates the site from the rest of Heathfield. Development as proposed will not integrate the development with its local context as required by paragraph 35 of PPS1. Nor will it maximise the opportunities for the site to benefit from clear and easy links to the facilities in the local service centre by non-car modes. 8. A comprehensive approach would look at the whole of the area in this north western part of Heathfield and then seek to identify the land which is most suited to development. It is common sense that this would start by looking at the land with the best links by foot, cycle, and public transport to the rest of the settlement. That is of course the frontage land along Heathfield Road/High Street itself. The frontage land also contains the previously developed land comprising the existing dwellings and their various outbuildings. Whilst the recent revisions to PPS3 have removed garden land from the definition of previously developed land, the footprint of the buildings and their associated driveways and hardstandings clearly have a higher priority for development than a greenfield meadow. 9. The present objectors, as the owners of Lavender Cottage, are willing to make their land available as part of a wider development. The objectors have made this known to the Council since at least August 2010. The principle of redevelopment for more intensive
residential development has already been established on land to the wets (WD/08/0329) and on the adjoining site to the east of Lavender Cottage (WD/2011/0400). Although planning permission was granted for a block of flats (WD/2008/0276), that development has not come forward and the permission has recently had to be renewed. Clearly, the land is available for development, even if the form of development is not at present attractive to the market. We understand that the owner of the adjoining plot at Holmhurst would be prepared to make that site available. Woodhatch is relied on as available in the SHLAA (Site 155/1210 refers). Thus there is already a substantial amount of the frontage land which is available for development. A spatial approach to the planning of this area would look to utilise this developed frontage land, which plainly has development potential, before turning to the undeveloped hinterland to the rear. Unjustified Encroachment into the AONB 10. The Proposed Submission Core Strategy recognises that SD11 lies within the AONB, where there is strict control over new development. Paragraph 22 of PPS7 is clear that major development in the AONB requires “the most rigorous examination” and that such development should only be accepted after assessment of the scope for meeting the need elsewhere. Under the GDMO 2010 “major development” is a development of 10 or more dwellings. Under the Secretary of State’s arrangements for the recovery of appeals on the basis that they are large/controversial, the threshold is 150 residential units. On either basis, a development of 160 dwellings is major development. In any event, the Council has accepted in the SHLAA that “there is a requirement to demonstrate development is essential to meet local needs and that other more suitable sites do not exist elsewhere” (Site 155/1210). The claimed rationale for the use of AONB land in this case is that “no suitable alternative non-AONB location exists”. This is patently incorrect. As already noted, the frontage land is not within the AONB and if the desire is to achieve a development of some 160 dwellings there can be no justification for taking more AONB land than is absolutely necessary when there is non-AONB land in the same location which is available. 11. Whilst it may be doubtful that the frontage land which is known to be available could alone accommodate the full scale of the development sought, the need to encroach into the AONB would be very much reduced if the frontage land was used first. Such an approach would also enable the lower (and least accessible) parts of the meadow to be retained as open land, potentially providing a better buffer with the important woodland at Tilsmore Wood that makes up such a key component of the Wealden character. The need for such a buffer is recognised in the Landscape Character Assessment (Figure 5). In addition, if the Council made it clear that it was promoting the comprehensive development of the area, it is likely that other owners would also wish to make their land available, and the Council may therefore be able to avoid encroaching into the AONB to any material degree. 12. The Council’s claim that 160 dwellings can be provided in the AONB without strategic adverse impact on the landscape is not supported by the evidence base. The capacity of 160 dwellings for SD11 would appear to derive from the assumed capacity of the 2 adjacent SHLAA sites: Site 155/1210 and Site 307/1210. As already noted, the Council’s Landscape Character Assessment shows (Figure 5) that large parts of these SHLAA sites are required to be retained as open space to provide a “landscape buffer” to Tilsmore Wood. If those buffers are to be provided as recommended in the Landscape Character Assessment, the SHLAA sites will not be able to deliver the required capacity, without radical changes to the assumed density, and there has been no assessment of the impact of higher density development on the AONB and on the landscape setting and character of Tilsmore Wood. The claim therefore that SD11 can be achieved without strategic adverse impact on the AONB is not supported by the evidence base. Using Less Accessible and Less Sustainable Land 13. Similar considerations in terms of minimising the amount of AONB land apply in relation to accessibility issues. The lower parts of the sloping meadow land are not only more remote by simple distance from the footways and bus route along Heathfield Road/High Street, there is also the fact that journeys from home will inevitably be uphill for residents of that area. There will therefore be a disinclination to use non-car modes for accessing local services, even if the form of development is not at present attractive to the market. We understand that the owner of the adjoining plot at Holmhurst would be prepared to make that site available. Woodhatch is relied on as available in the SHLAA (Site 155/1210 refers). Thus there is already a substantial amount of the frontage land which is available for development. A spatial approach to the planning of this area would look to utilise this developed frontage land, which plainly has development potential, before turning to the undeveloped hinterland to the rear. Unjustified Encroachment into the AONB 10. The Proposed Submission Core Strategy recognises that SD11 lies within the AONB, where there is strict control over new development. 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There will therefore be a disinclination to use non-car modes for accessing local services, even if they might appear to be within walking distance. It must also be doubted whether much of the hinterland is within the preferred 400m distance for access to a bus route. 14. In contrast, the frontage development is already connected to existing pedestrian routes by the adjacent footways and there is only a shallow fall in the land closest to the roadside. Accessibility to the bus route is also much improved. 15. Again, on any sensible measure of accessibility and sustainability, it cannot make sense to use the more remote hinterland in preference to the frontage land. PPS1 is clear at paragraph 35 that new development needs to be integrated into the urban area and address connectivity issues. The choice of a backland location for SD11 when the more accessible frontage land is available is directly contrary to this guidance Inadequate safeguarding of amenities 16. We have already explained why a comprehensive approach needs to be taken to this area. However, if the Council persists in its piecemeal approach then it is apparent that inadequate consideration has been given to the relationship between the retained frontage properties and the new development to the rear. The existing development is at a very low density and has the established character of a mature residential area, with individual dwellings in spacious plots. 17. The SHLAA indicates a proposed density for the new development of some 40 dwellings per hectare for Site 155/120. This will be substantially different in character and could only be achieved by ensuring a substantial buffer between the 2 very different forms of development. However, this would push the new development further into the AONB and would further separate the new development from the settlement of which it is intended to form a part. Again, there would be a conflict with the advice in PPS1 on integrating the development with the urban area. Soundness Tests 18. It is clear from the objections set out above that the proposals for SD11 are not founded on a robust and credible evidence base, cannot be shown to be the most appropriate strategy when considered against the reasonable alternatives, and are not consistent with national policy in PPS1, PPS3, and PPS7 in several important respects. They therefore fail 2 of the key tests of soundness as set out at paragraph 4.52 of PPS12. Legal Tests 19. These objections also
have the consequence that the Council’s failure to properly consider reasonable alternatives to its proposals at north west Heathfield, and in particular to consider the alternative of an area of growth in this location planned on a comprehensive basis and focused on maximising the use of previously developed land and minimising the use of land within the AONB, has the consequence that the Sustainability Appraisal/Strategic Environmental Assessment that accompanies the Core Strategy is legally deficient and the Core Strategy is consequently not legally compliant with the requirements of either Regulation 5(1) of the Environmental Assessment of Plans and Programmes Regulations 2004 or with the requirements of s.19(5) and s.20(2) Planning & Compulsory Purchase Act 2004. In addition, the same failings, together with the lack of a credible and robust evidence base to support those proposals and the conflicts with national policy mean that the Core Strategy is not “sound” as required by s.20(5)(b) PCPA 2004. 20. The SA/SEA considers, in broad terms, alternative locations for growth at Heathfield as between the north east, north west, and west of the town. However, what it fails to do is to look at reasonable alternatives within the selected north west location. It is no answer for the Council to suggest that this level of detail is a matter for a later DPD because the Core Strategy is already spatially specific that the location of north west Heathfield is an “urban extension” (i.e. an addition) and that it is “within the AONB” (i.e. outside the settlement boundary. The same spatial approach is shown on Figure 10 and on the Inset for the Key Diagram. The Council is not, therefore, able to avoid grappling with the spatial implications of this choice as part of the Core Strategy and testing it against reasonable alternatives. However, it is clear that this is not an exercise that has been attempted in the SA/SEA. 21. The Council will be well aware from the recent decision in Save Historic Newmarket Ltd v Forest Heath District Council [2011] EWHC 606 (Admin) that a failure in the SA/SEA to give proper consideration to identification and assessment of reasonable alternatives is likely to result in a quashing of the relevant parts of the Core Strategy. Conclusion 22. For all of these reasons the objectors strongly suggest that neither the Council nor the Inspector should endorse the present proposals for SD11. What is required is a fundamental rethink to achieve an integrated, sustainable and accessible development which minimises the impact on the AONB and provides a comprehensive spatial approach to the development of this area. Essentially this requires the focus to shift from the “easy target” of greenfield meadows to a more considered approach, giving priority to the previously developed frontage land, and only considering the AONB hinterland to the minimum extent necessary to achieve the required dwelling numbers.

Details of Changes to be Made:

As advised, this electronic comment section is for comments to be read against the entire document; having made specific comments throughout the document, but being unable to submit a comment electronically against “10 Key Diagram”. This comment relates to the Key Diagram and is linked to 8 other comments made throughout the document. The specific comment is to replace the Heathfield Inset with a version of Figure 10 revised as per point (viii) below. Owing to the general nature of this section for comment, the suite of 9 objections/comments are set out below: (i) Add to SPO1 the words “We will minimise the loss of, or impact on, nationally designated landscapes, including the High Weald AONB, to the fullest extent possible in meeting the needs of the plan area”. (ii) Add to paragraph 5.8 the words “We will, nonetheless, maximise the use of brownfield land and will minimise the use of greenfield land, with brownfield opportunities having priority in meeting needs.” (iii) WCS2: If the Heathfield Inset to the Key Diagram is changed as per point (ix) below, no change is necessary. Otherwise, delete the sentence “Broad locations...Key Diagram”. (iv) WCS4: If the location and description of SD11 is changed on Figure 10 as per point (viii) below and on the Heathfield Inset of the Key Diagram as per point (ix) below, no change is necessary. (v) Delete from the first sentence of paragraph 6.40, all words from “although potential sites...” onwards. (vi) Change paragraph 6.41 to read: “The most suitable location for housing lies at the north west of the town where access to the town centre is good and bus routes exist. The location includes the existing developed frontage along Heathfield Road/High Street and there is some potential for the use of some of the AONB land to the rear, provided that the use of previously developed land is maximised and the use of AONB land is minimised. A comprehensive approach to development is required to achieve an accessible and sustainable development that is well integrated into the existing settlement and avoids significant adverse impact on the AONB. The release of some AONB land to meet local needs may be justified if the necessary scale of provision cannot be achieved from the previously developed land alone. The AONB land may be identified as a contingency if not all of the previously developed land comes forward.” (vii) Change para 6.42 item 3 to read: “meeting the housing and community needs of Heathfield by allocating deliverable housing sites for around 160 homes on land within and potentially adjoining the urban area at north west Heathfield (SD11). Sites for housing development within this broad location will be identified and phased on a comprehensive basis as part of the Site Allocations DPD.” (viii) Change Figure 10 to remove the red/pink notation and replace it by a red dwellinghouse symbol located within the urban area to the immediate north of the A265, and replace the text annotation by the words “Comprehensive development area at north west Heathfield (SD11) (residential provision).” (ix) Key Diagram: replace the Heathfield Inset with a version of Figure 10 revised as per point (viii) above. The reasons for these changes are set out in the responses provided to Q4 above.
Details of Reasons for Soundess/ Legal Complaince:

Details of Changes to be Made:

It is noted that the Core Strategy plan proposes 700 additional homes north of Hailsham in Hellingly together with
8650 M2 of employment floorspace. We feel the Danecroft Nursery site is ideal for inclusion as an employment
site for the following reasons:- 1. The site until recently employed up to 50 persons. it is ready and available for
employment creation. 2. It is well located being close to the new Hellingly Hospital development site and Hellingly
Village with the Cuckoo Trail adjacent. Road re-development and traffic calming measures associated with the
Hellingly Hospital site (currently in progress) will bring the road network up to a good safe standard. There is a
strong possibility of alternative primary access from our Client's land onto Park Road, which would direct traffic
away from Station Road and Hellingly village. 3. Part of the Danecroft Nurseries site is already in use for B1/B8
(non-depot) use. It is ideally situated away from most residential properties and shielded from view. If accepted in
principle, our Client will be prepared to negotiate the scale and pace of re-development of the site. 4.
Environmentally the site is highly suitable for re-development as it would make better use of land already fully built
upon, and reduce vehicular journeys for those living in the area. There are two existing boreholes which can
supply water to the site, and a sewage treatment plant can assist in reducing effluent discharging to the
Pevensey Levels. Surface water will discharge to soakaways as the sub-soil is suitably porous. The site is not on a
flood plain. The Danecroft Nurseries site, if included as an employment site within the North Hailsham Strategic
Development Area (SDA 3) would make a valuable contribution to achieving the new employment space required
to support the new housing development in the area, in accordance with the strategy of Hailsham and Hellingly
outlined in paragraph 6.19, Point 3.

Details of Reasons for Soundess/ Legal Complaince:

Details of Changes to be Made:

This response is on behalf of the Old Heathfield and Cade Street Society. 'Our Society welcomes the Framework's
approach of locating the bulk of new development in areas that are close to recognised centres of employment
and that offer the infrastructure capable of supporting the growth of their local population. In the case of Heathfield,
locating the proposed development of 160 new dwellings over the Strategy period close to existing bus routes on
the A267 (and within one mile of the town centre) seems extremely sensible. Significantly, this location also avoids
making an unnecessary impact on the Area of Outstanding Natural Beauty (which would have been the case with
the sites to the east of the town centre, as suggested in the SHLAA recommendations). Our Society does regard
the development of as many as 100 new dwellings in Horam with some suspicion. Whilst the old Merrydown site
represents a logical location for new development, the absence of any real infrastructure creates unnecessary
pressures on the locality, in particular in terms of increased traffic movements (whether to educational or
employment centres).

Details of Changes to be Made:
Representation ID
144
Person ID  Mrs  Fillery  Agent ID
521046

Proposed Submission
Core Strategy

Sound  ☐ Yes  ☑ No  ☑ Justified  ☑ Effective  ☑ Consistent with national policy
Legally Compliant  ☑ Yes  ☐ No

Details of Reasons for Soundess/ Legal Complaince:
Not suitable for houses. We lose another green space which could be used. To many Housing in Polegate as it is only a small Town (Village) with limited facilities. Enclosed letter I sent to paper.

Details of Changes to be Made:

Representation ID
176
Person ID  Mrs  Larkin  Agent ID
521203  East Dean & Friston Parish Council

Proposed Submission
Core Strategy

Sound  ☐ Yes  ☑ No  ☑ Justified  ☐ Effective  ☐ Consistent with national policy
Legally Compliant  ☑ Yes  ☐ No

Details of Reasons for Soundess/ Legal Complaince:
East Dean, unlike the twelve other service centres, local service centres and neighbourhood centres within rural areas is the only one which lies within the South Downs National Park. The SDNP is the planning authority for this area and is in the process of producing its own LDF. WDC has agreed to provide a planning service for the SDNP where minor developments are involved but SDNP has made it clear that three or more dwellings on the edge of a small village would be considered to be ‘major’ and would be called in and dealt with by SDNP’s in-house planning department. In any case WDC is required to observe the SDNP’s role which is to enhance the natural beauty, wildlife and cultural heritage of the area and to promote opportunities for the understanding and enjoyment of the Park’s special qualities by the public.

Details of Changes to be Made:
East Dean should be omitted from the Table 11 allocating housing numbers to the rural villages.

Representation ID
195
Person ID  Ms  Jenkins  Agent ID
510602  Maresfield Conservation Group

Proposed Submission
Core Strategy

Sound  ☐ Yes  ☐ No  ☐ Justified  ☐ Effective  ☐ Consistent with national policy
Legally Compliant  ☐ Yes  ☐ No

Details of Reasons for Soundess/ Legal Complaince:
Many villages in rural areas, including Maresfield, suffer severe environmental damage from high levels of speeding traffic. We wish to see specific policies introduced to provide for better management and traffic diversion where appropriate to protect village centres and particular mention should be made to the already prepared Transport Plan for Maresfield.

Details of Changes to be Made:
Details of Reasons for Soundness/ Legal Compliance:

We note that the proposed submission makes little or no reference to Conservation Areas even though earlier consultation documents did. We wish to see specific policies introduced to provide for better protection and enhancement of Conservation Areas, such as Maresfield.

Details of Changes to be Made:
CPRE Sussex does not wish to take an overall view at this stage on whether or not the draft Core Strategy is legally compliant. However, there is no third box to tick. CPRE does wish to submit the comments and suggested changes below on draft Core Strategies WCS1-WCS13. Some draft strategies are supported, some are not supported and some need additional clarification. WCS1 Provision of homes & jobs 2006-2030 CPRE Sussex has no objection to the plans to deliver 9,600 new dwellings in the District over the period 2006-2030 at an average rate of 400/year or to the plans to provide an additional 40,000 square metres of new employment space over the same period. However, the delivery of the two policies should be more explicitly linked and they should be monitored together. If the new housing planned were to be delivered or exceeded without the planned increase in District economic activity, the consequence would be additional long-distance out-commuting, contrary to objectives SPO6, SPO7, SPO9 & SPO13, and/or decreased local economic wellbeing due to under-employment or low local wage rates, contrary to objectives SPO3, SPO4 & SPO6. WCS2 Distribution of local housing growth 2006-2030 CPRE Sussex supports the intention to provide most new housing in the main towns in the District, with only about 10% of new housing being built in rural communities. This is consistent with objective SPO1. However, we note that about 20% of new housing already built or approved is in rural areas. Building houses in rural areas unconnected to local needs is inherently unsustainable and contrary to objectives SPO1, SPO6, SPO7, SPO9 & SPO13. It is essential for monitoring to ensure that the 10% proportion of new housing in rural communities is not exceeded during the remainder of the planning period and to make provision in the Core Strategy for remedial action should this become necessary. WCS3 Distribution of Employment CPRE Sussex questions whether a zero allocation of new employment land to rural areas is appropriate. This appears to conflict with objective SPO8. Some rural areas are currently characterised by high levels of out-commuting, and would benefit from additional local employment opportunities, which may require provision of new employment sites. Conversion of redundant farm buildings into new employment sites will often be more appropriate than their conversion to additional commuter residences. Additional rural employment would help achieve objectives SPO6 & SPO13. While identification of specific new rural employment sites should be left to Neighbourhood Development Plans, and not attempted centrally, an allocation for the overall provision of such sites should be made within the employment total, with appropriate monitoring to ensure that it is achieved. WCS4 & WCS5 Strategic development areas & Managing the release of housing land Formal allocation in the Core Strategy of all the strategic development areas proposed in WCS4 is very likely to lead to a far greater rate of housebuilding than that proposed in policy WCS1. This is because no allowance is made within the 9,600 total for continued redevelopment of brownfield land after 2015, or for continued windfall developments. Both of these can be expected to make a substantial and sustainable continuing contribution to total housebuilding in the District. There is also no allowance for development on rural exception sites. The proposal that new residential development should be almost exclusively on greenfield sites from 2015 onwards (Fig.4, p.30) is directly contrary to objective SPO14. It is essential that the Core Strategy should include policies to promote this objective. The predictable consequence of housebuilding above the target level would be additional long-distance out-commuting, contrary to objectives SPO6, SPO7, SPO9 & SPO13, and/or decreased local economic wellbeing due to under-employment or low local wage rates, contrary to objectives SPO3, SPO4 & SPO6. The sites included in WCS4 should thus be prioritised not only on the basis of the times at which they might come forward, but also on their desirability. Some sites, over half the total, should be allocated only provisionally at this time, with the explicit recognition that they may not actually be brought forward for development within the period to 2030, if monitoring demonstrates that more sustainable brownfield or windfall sites have become available to meet the total provision planned. CPRE Sussex strongly objects to the proposal SD11, for the development of land at North West Heathfield, because this AONB land has exceptional landscape value and must be protected. Housebuilding here on the scale envisaged is directly contrary to policy SPO1. CPRE Sussex also objects, for the same reason, to housebuilding on the reserve area to the north of Crowborough. WCS6 Rural areas strategy CPRE Sussex does not object to the overall allocation of new housing to the rural areas. CPRE Sussex supports rural site allocations being determined by DPD, with the proviso that the rural communities concerned must have the opportunity to develop Neighbourhood Development Plans for this purpose should they so wish. The rationale for the distribution proposed between settlements is unexplained. Is the allocation of 50-100 new houses each to Horam, Herstmonceux, Wadhurst, Maresfield and Ninfield, smaller allocations to several other settlements, but zero allocations to many more including fairly large rural settlements such as Forest Row, Mayfield, Alfriston, Buxted, East Hoathly, Framfield, Fletching and Laughton based on local
choice or centrally imposed? There is a recognised shortage of affordable housing in many rural communities. The Core Strategy should include stronger policies to recognise and meet this need for rural affordable housing for local needs, with details delegated to DPD or NDP, but total provision included within the planning totals. Even quite small settlements will surely need some new housing, especially affordable housing, to meet local needs over the 15-20 year planning period. Zero allocations are surely impossible to justify except in the most exceptional circumstances. High allocations should not be imposed on rural settlements without their consent, and should only be considered if there is evidence of local employment need. Otherwise they will cause increased unsustainable out-commuting, contrary to objectives SPO6, SPO7, SPO9 & SPO13. There should be an explicit policy to recognise that large monolithic developments will almost certainly have substantial negative impacts on the character and economy of a rural settlement, contrary to objective SPO13. The Core Strategy should include a policy for a maximum size for such rural developments, no more than 20-25 houses at a time. If a larger rural site is identified for development, it should be split into smaller sites to be developed at different times and in different styles. Such small sites are also likely to prove attractive to local housebuilders and thus be of more benefit to the local economy than large sites constructed by national developers. CPRE Sussex supports the proposal that overall rural housebuilding, including affordable housebuilding, should be carefully monitored, with effective policies to ensure that it does not in total exceed the planned level. WCS7 Effective provision of infrastructure CPRE Sussex supports this strategy. WCS8 Affordable housing CPRE Sussex broadly supports this policy. The policy that affordable housing should be integrated, and indistinguishable in design terms from associated market housing, is particularly welcomed. In estimating housing need, the needs for affordable and market housing should be estimated and monitored separately. Constructing market housing will not meet the need for affordable housing (or vice versa) and building additional market housing risks exacerbating the already unsustainable levels of out-commuting from the District, contrary to objectives SPO6, SPO7, SPO9 & SPO13. It is accepted that in certain cases the otherwise desirable development of brownfield sites may incur higher costs that make the provision of affordable housing at the level specified in policy WCS8 uneconomic. However, the profitability of greenfield development is such that affordable housing to at least the level specified should always be a precondition of development. If a developer finds that residential development of an allocated greenfield site has costs such that the specified level of affordable housing is uneconomic, then there should be a policy for that site to be removed from the list of allocated sites, and replaced by an alternative site that can provide the necessary affordable housing. There should be provision in the Core Strategy for DPDs and NDPs for rural areas to specify higher levels of affordable housing, up to 100%, to meet local needs. WCS9 Rural Exception Affordable Housing This policy states that “in exceptional circumstances” planning permission may be granted for small scale affordable housing development in rural areas outside development boundaries, to meet an identified local housing need for people unable to compete in the normal housing market. CPRE Sussex believes that there is nothing exceptional about such needs in prosperous rural areas such as Wealden. They are present in virtually every rural settlement. Thus policy WCS9 should assume that such needs will be present in rural communities throughout the District, and that suitable exception sites will be identified in every settlement, at some stage during the 20 year planning period. Sites should be identified by the parish or settlement concerned through a Neighbourhood Development Plan or other DPD. The numbers of such exception sites needed in each settlement should be determined by the community concerned, but the overall total estimated and included within the new rural housing allocation (455) in the Core Strategy. This will reduce the need for new market housing allocations for rural communities. This is appropriate, as it is affordable housing for local needs that is in particularly short supply in rural areas. This policy should apply equally to all rural areas in Wealden District, including those in the High Weald AONB and the SDNP. The wording of WCS9 should be amended to make it clear that exception site housing is exclusively intended for people with a strong connection to that particular rural community. Secure local employment should be considered a particularly strong connection, as this will reduce commuting. WCS12 Biodiversity CPRE Sussex strongly supports this policy. Wealden District is particularly characterised by a high proportion of ancient woodland, which makes a strong contribution to the District’s biodiversity, and CPRE Sussex would wish to see this particular local importance of ancient woodland identified in the Core Strategy. WCS13 Green infrastructure CPRE Sussex broadly supports this policy. However, it is noted that some greenfield land proposed for strategic allocation for housing or employment contribute to the existing green infrastructure, so there appears to be some inherent tension between this strategy and strategy WCS4.

Details of Changes to be Made:
The amendments CPRE Sussex believes to be required to draft Core Strategies WCS1-WCS13 are indicated below. WCS1 Provision of homes & jobs 2006-2030 CPRE Sussex has no objection to the plans to deliver 9,600 new dwellings in the District over the period 2006-2030 at an average rate of 400/year or to the plans to provide an additional 40,000 square metres of new employment space over the same period. However, the delivery of the two policies should be more explicitly linked and they should be monitored together. If the new housing planned were to be delivered or exceeded without the planned increase in District economic activity, the consequence would be additional long-distance out-commuting, contrary to objectives SPO6, SPO7, SPO9 & SPO13, and/or decreased local economic wellbeing due to under-employment or low local wage rates, contrary to objectives SPO3, SPO4 & SPO6. WCS2 Distribution of local housing growth 2006-2030 CPRE Sussex supports the intention to provide most new housing in the main towns in the District, with only about 10% of new housing being built in rural communities. This is consistent with objective SPO1. However, we note that about 20% of new housing already built or approved
is in rural areas. Building houses in rural areas unconnected to local needs is inherently unsustainable and contrary to objectives SPO1, SPO6, SPO7, SPO9 & SPO13. It is essential for monitoring to ensure that the 10% proportion of new housing in rural communities is not exceeded during the remainder of the planning period and to make provision in the Core Strategy for remedial action should this become necessary. WCS3 Distribution of Employment CPRE Sussex questions whether a zero allocation of new employment land to rural areas is appropriate. This applies to conflict with objective SPO8. Some rural areas are currently characterised by high levels of out-commuting, and would benefit from additional local employment opportunities, which may require provision of new employment sites. Conversion of redundant farm buildings into new employment sites will often be more appropriate than their conversion to additional commuter residences. Additional rural employment would help achieve objectives SPO6 & SPO13. While identification of specific new rural employment sites should be left to Neighbourhood Development Plans, and not attempted centrally, an allocation for the overall provision of such sites should be made within the employment total, with appropriate monitoring to ensure that it is achieved. WCS4 & WCS5 Strategic development areas & Managing the release of housing land Formal allocation in the Core Strategy of all the strategic development areas proposed in WCS4 is very likely to lead to a far greater rate of housebuilding than that proposed in policy WCS1. This is because no allowance is made within the 9,600 total for continued redevelopment of brownfield land after 2015, or for continued windfall developments. Both of these can be expected to make a substantial and sustainable continuing contribution to total housebuilding in the District. There is also no allowance for development on rural exception sites. The proposal that new residential development should be almost exclusively on greenfield sites from 2015 onwards (Fig.4, p.30) is directly contrary to objective SPO14. It is essential that the Core Strategy should include policies to promote this objective. The predictable consequence of housebuilding above the target level would be additional long-distance out-commuting, contrary to objectives SPO6, SPO7, SPO9 & SPO13, and/or decreased local economic wellbeing due to under-employment or low local wage rates, contrary to objectives SPO3, SPO4 & SPO6. The sites included in WCS4 should thus be prioritised not only on the basis of the times at which they might come forward, but also on their desirability. Some sites, over half the total, should be allocated only provisionally at this time, with the explicit recognition that they may not actually be brought forward for development within the period to 2030, if monitoring demonstrates that more sustainable brownfield or windfall sites have become available to meet the total provision planned. CPRE Sussex strongly objects to the proposal SD11, for the development of land at North West Heathfield, because this AONB land has exceptional landscape value and must be protected. Housebuilding here on the scale envisaged is directly contrary to policy SPO1. CPRE Sussex also objects, for the same reason, to housebuilding on the reserve area to the north of Crowborough. WCS6 Rural areas strategy CPRE Sussex does not object to the overall allocation of new housing to the rural areas. CPRE Sussex supports rural site allocations being determined by DPD, with the proviso that the rural communities concerned must have the opportunity to develop Neighbourhood Development Plans for this purpose should they so wish. The rationale for the distribution proposed between settlements is unexplained. Is the allocation of 50-100 new houses each to Horam, Herstmonceux, Wadhurst, Maresfield and Ninfield, smaller allocations to several other settlements, but zero allocations to many more including fairly large rural settlements such as Forest Row, Mayfield, Alfriston, Buxted, East Hoathly, Framfield, Fletching and Laughton based on local choice or centrally imposed? There is a recognised shortage of affordable housing in many rural communities. The Core Strategy should include stronger policies to recognise and meet this need for rural affordable housing for local needs, with details delegated to DPD or NDP, but total provision included within the planning totals. Even quite small settlements will surely need some new housing, especially affordable housing, to meet local needs over the 15-20 year planning period. Zero allocations are surely impossible to justify except in the most exceptional circumstances. High allocations should not be imposed on rural settlements without their consent, and should only be considered if there is evidence of local employment need. Otherwise they will cause increased unsustainable out-commuting, contrary to objectives SPO6, SPO7, SPO9 & SPO13. There should be an explicit policy to recognise that large monolithic developments will almost certainly have substantial negative impacts on the character and economy of a rural settlement, contrary to objective SPO13. The Core Strategy should include a policy for a maximum size for such rural developments, no more than 20-25 houses at a time. If a larger rural site is identified for development, it should be split into smaller sites to be developed at different times and in different styles. Such small sites are also likely to prove attractive to local housebuilders and thus be of more benefit to the local economy than large sites constructed by national developers. CPRE Sussex supports the proposal that overall rural housebuilding, including affordable housebuilding, should be carefully monitored, with effective policies to ensure that it does not in total exceed the planned level. WCS7 Effective provision of infrastructure CPRE Sussex supports this strategy. WCS8 Affordable housing CPRE Sussex broadly supports this policy. The policy that affordable housing should be integrated, and indistinguishable in design terms from associated market housing, is particularly welcomed. In estimating housing need, the needs for affordable and market housing should be estimated and monitored separately. Constraining market housing will not meet the need for affordable housing (or vice versa) and building additional market housing risks exacerbating the already unsustainable levels of out-commuting from the District, contrary to objectives SPO6, SPO7, SPO9 & SPO13. It is accepted that in certain cases the otherwise desirable development of brownfield sites may incur higher costs that make the provision of affordable housing at the level specified in policy WCS8 uneconomic. However, the profitability of greenfield development is such that affordable housing to at least the level specified should always be a precondition of development. If a developer finds that residential development of an allocated greenfield site has costs such that the specified level of affordable housing
is uneconomic, then there should be a policy for that site to be removed from the list of allocated sites, and replaced by an alternative site that can provide the necessary affordable housing. There should be provision in the Core Strategy for DPDs and NDPs for rural areas to specify higher levels of affordable housing, up to 100%, to meet local needs. WCS9 Rural Exception Affordable Housing This policy states that “in exceptional circumstances” planning permission may be granted for small scale affordable housing development in rural areas outside development boundaries, to meet an identified local housing need for people unable to compete in the normal housing market. CPRE Sussex believes that there is nothing exceptional about such needs in prosperous rural areas such as Wealden. They are present in virtually every rural settlement. Thus policy WCS9 should assume that such needs will be present in rural communities throughout the District, and that suitable exception sites will be identified in every settlement, at some stage during the 20 year planning period. Sites should be identified by the parish or settlement concerned through a Neighbourhood Development Plan or other DPD. The numbers of such exception sites needed in each settlement should be determined by the community concerned, but the overall total estimated and included within the new rural housing allocation (455) in the Core Strategy. This will reduce the need for new market housing allocations for rural communities. This is appropriate, as it is affordable housing for local needs that is in particularly short supply in rural areas. This policy should apply equally to all rural areas in Wealden District, including those in the High Weald AONB and the SDNP. The wording of WCS9 should be amended to make it clear that exception site housing is exclusively intended for people with a strong connection to that particular rural community. Secure local employment should be considered a particularly strong connection, as this will reduce commuting. WCS12 Biodiversity CPRE Sussex strongly supports this policy. Wealden District is particularly characterised by a high proportion of ancient woodland, which makes a strong contribution to the District’s biodiversity, and CPRE Sussex would wish to see this particular local importance of ancient woodland identified in the Core Strategy. WCS13 Green infrastructure CPRE Sussex broadly supports this policy. However, it is noted that some greenfield land proposed for strategic allocation for housing or employment contribute to the existing green infrastructure, so there appears to be some inherent tension between this strategy and strategy WCS4.

Representation ID
261
Person ID Ms Dobell
Agent ID 518052

Proposed Submission
Core Strategy

Sound ☐ Yes ☐ No ☐ Justified ☐ Effective ☐ Consistent with national policy
Legally Compliant ☐ Yes ☐ No

Details of Reasons for Soundess/ Legal Complaince:

Details of Changes to be Made:
"The Strategy promotes sustainable growth to meet our needs by balancing the ability of our environment and infrastructure to accommodate that growth" It is important to note that the differing needs of growth and the environment cannot be balanced. What is planned might include mitigation schemes, but will lead to the degrading of the environment in Wealden. There will be a loss of brownfield sites which are often wildlife rich, and of greenfield sites which reduce the capacity of the county to produce food.
The Core Strategy fails to provide for an adequate and appropriate level housing development within the Plan Period to 2030. This is essentially as the anticipated completion rate of 400 dwellings per year falls below that set within the South East Plan (Regional Strategy) at 550 dwellings per year and will create a significant shortfall in housing provision. The Core Strategy acknowledges that the an overall target for housing provision has been set in the "context" of the South East Plan and that the South East Plan established a sound evidence base against which to prepare the plan. The Core Strategy however significantly departs from the South East Plan which remains part of the development figures for the Plan. Whilst the Secretary of State's intention to revoke the South East Plan (together with all other Regional Strategies) is a "material consideration", it remains in place during the course of preparation and consideration of the Core Strategy, for the purposes of the Planning Acts and related legislation, national planning statements (PPSs) and planning guidance (PPGs). The Core Strategy is premature in relying upon the revocation of the South East Plan. The Strategy represents "opportunism" to abandon previously fully debated and considered levels of development which emerged following extensive public consultation and participation, the considered advice of the constituent local planning authorities, infrastructure providers (including waste water treatment and transportation), Government Departments, NGOs, land owners, developers, etc all of which constitutes (within the finally published South East Plan) a substantial and evidenced based strategic planning document. The total production cost of the South East Plan to the public purse alone warrants extreme care and substantial justification should Wealden District Council ("the Council") be permitted to depart from the policies and proposals of that Plan. From an assessment of the justification for departing from the South East Plan's housing provision figures for the District, the Core Strategy's background papers and other related documents reveal a relatively superficial level of systematic analysis (despite the extent of the suite of background documents) in terms of infrastructure capacity and improvement through developer funding options, together with, in Hailsham's case, an unpreparedness to identify and include other growth options which could provide for an increased new housing yield within the Plan Period. The Core Strategy does not contain any infrastructure co-ordination and delivery policy which could establish a Community Infrastructure Levy (or CIL). Policy WCS7 does not enable such an approach towards cumulative funding from developer contributions to be established. Given the concerns expressed throughout the Core Strategy and supporting documentation regarding the infrastructure constraints which have been applied, this seems an omission of an essential tool which could be used to overcome such constraints enabling the level of growth to be increased in line with that envisaged within the South East Plan. The basis for rejecting additional but otherwise suitable growth locations around Hailsham for instance relies, upon a predetermined "cap" set essentially by sewage treatment works and local road network capacity despite the fact that this was all well understood and considered by the South East Plan Examination-In-Public Panel, but who nevertheless recommended an increase in housing provision for the District. The Panel report clearly addressed these matters and the text of the Report indicates that the Panel was also made aware of proposed studies into these matters but identified no obviously fundamental obstacle to higher levels of housing development than are now being proposed within the Core Strategy. These matters have been further investigated by PFA (consulting engineers) and their report is attached to these representations. The conclusion is that, in the case of Hailsham, there was no completed transport modelling of the various site options identified during the formulation of the Core Strategy and that the sewage treatment works studies identified by the Panel are nearing completion. The decision to restrict development around Hailsham without having completed the traffic modelling options and awaiting the outcome of the sewage treatment works study implies an unwillingness to fully explore the potential for growth around Hailsham and related funding / phasing options for infrastructure improvements or increased capacity. Curiously elsewhere, the Core Strategy is sanguine about the potentially serious odour constraint applicable to the intended urban extension east of Hailsham, and whilst acknowledging the need for a study is, nevertheless, content to include that area within the Key Diagram for growth. This represents an inconsistent approach to plan making. The incomplete factual analysis which surrounds the various growth options for Hailsham for instance, demonstrates that this Core Strategy is unsound. The decision to underprovide based upon incomplete analysis and in so doing depart from the "tried and tested" level of housing provision identified within the South East Plan remains a significant flaw within the Core Strategy.

**Details of Changes to be Made:**
The Core Strategy should be reformulated following the completion of various infrastructure capacity studies and...
the re-assessment of further development options which could deliver increased levels of housing consistent with
the South East Plan i.e. 550 dpa or 13,200 new dwellings within the period 2006-2030 taking into account the
extended plan period. These studies should provide detailed information regarding the likely level of cost
associated with the increased infrastructure capacity necessary to support the additional growth and would then
provide a basis for establishing a developer funding regime through the application of a Community Infrastructure
Levy or CIL. The absence of an effective Core Strategy Policy to address the provision and collective funding of
infrastructure, co-ordination and delivery of sites in tandem with or through phased implementation represents a
serious omission which needs to be addressed.

Representation ID
517
Person ID  Ashdown
Agent ID  Natural England
Proposed Submission
Core Strategy
Sound  ☐ Yes  ☐ No  ☐ Justified  ☐ Effective  ☐ Consistent with national policy
Legally Compliant  ☐ Yes  ☐ No
Details of Reasons for Soundess/ Legal Complaince:
Habitats Regulations Assessment (HRA) Natural England is satisfied with the HRA and supports the avoidance
and mitigation package proposed. We agree with the conclusion that provided the avoidance and mitigation
package is implemented then there will be no likely significant effect on any of the designated sites.

Details of Changes to be Made:

Representation ID
518
Person ID  Ashdown
Agent ID  Natural England
Proposed Submission
Core Strategy
Sound  ☐ Yes  ☐ No  ☐ Justified  ☐ Effective  ☐ Consistent with national policy
Legally Compliant  ☐ Yes  ☐ No
Details of Reasons for Soundess/ Legal Complaince:
Sustainability Appraisal (SA) Natural England commends the Council on the presentation of the report and the use
of maps and diagrams Page 38 Heathfield We recommend that the following is added "Help protect the High
Weald tourism interests of the town whilst protecting the qualities of the High Weald AONB" Page 38 –
Crowborough We recommend that Point 8 includes "...and the High Weald AONB” Page 39 – Polegate We
welcome the inclusion of item 4 “Protect the character and landscape value of the National Park and its
surroundings while promoting access” Page 46 We welcome the section on landscape and biodiversity under 6.10
Page 80 and Page 96 The South Down National Park has not been mentioned or the potential for developments to
affect the setting of the National Park. This is particularly important as there has recently been a public inquiry into
an existing site (although the Inspector has not yet made a decision on this). Page 117 We welcome the suite of
mitigation measures that have been proposed. Page 121 We welcome the recognition between health and the
environment by the inclusion of ANGS1 standards Page 123/124 The amount of land under environmental
stewardship schemes could be used as an indicator. The data can be obtained from MAGIC: Multi Agency
Geographic Information for the Countryside.

Details of Changes to be Made:
Representation ID
596
Person ID  Mr Pursglove  Agent ID
104412

Proposed Submission
Core Strategy

Sound  ☐ Yes  ☐ No  ☐ Justified  ☐ Effective  ☐ Consistent with national policy
Legally Compliant  ☐ Yes  ☐ No

Details of Reasons for Soundess/ Legal Compliance:
The conversion of water mills could generate electricity

Details of Changes to be Made:

Representation ID
666
Person ID  Mr Place  Agent ID
520783

Proposed Submission
Core Strategy

Sound  ☐ Yes  ☐ No  ☐ Justified  ☐ Effective  ☐ Consistent with national policy
Legally Compliant  ☐ Yes  ☐ No

Details of Reasons for Soundess/ Legal Compliance:
It is alright on paper building dwellings to house people but when the approved site only has parking spaces for one car per dwelling, it is obvious in the day and age that a social disaster is in the planning for the future. One only has to look at the side roads to find cars parked on the kerb, double yellow lines and across junctions. We all like our own space but when one can't park their car on their own property, friction between families results and the roads heal up.

Details of Changes to be Made:

Representation ID
670
Person ID  Lord Lloyd  Agent ID
121962

Proposed Submission
Core Strategy

Sound  ☐ Yes  ☐ No  ☐ Justified  ☐ Effective  ☑ Consistent with national policy
Legally Compliant  ☑ Yes  ☐ No

Details of Reasons for Soundess/ Legal Compliance:
I refer to BR5 (Biodiversity) Appendix 1 Tables 4 and 5. Table 4 includes Arlington Reservoir as and LNR Table 5 includes Ludlay Coppice as an SNCI The woodland is an important habitat for wildlife and plant species as appears from the enclosed statements by Michael Hawkins and the Rev. Peter Blee. The reason is, of course, that is has not been disturbed for over fifty years. There cannot be many such sites in East Sussex, certainly none on such a large scale. It is essential that it remains undisturbed if we care at all about biodiversity, as we should. This is all the more important because of the woodland's proximity to Arlington Reservoir and Ludlay Coppice. As Mr Hawkins explains in his statement the development of the woodland for housing would inevitably have an adverse impact on the other sites. This would be a tragedy. It should therefore be included in Table 4 or 5. At the very least it should be designated a Biodiversity Opportunity Area, and included in Table 7.

Details of Changes to be Made:
<table>
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<tr>
<th>Representation ID</th>
<th>Person ID</th>
<th>Person Name</th>
<th>Agent ID</th>
<th>Proposed Submission</th>
<th>Core Strategy</th>
<th>Details of Reasons for Soundness/ Legal Compliance:</th>
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<td>673</td>
<td>106740</td>
<td>Mrs Roberts</td>
<td>Chiddingly Parish Council</td>
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<td>675</td>
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<td>Mrs Roberts</td>
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<td>Yes</td>
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<td></td>
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<td>700</td>
<td>514904</td>
<td>Ms Harrison</td>
<td>Surrey County Council</td>
<td>Yes</td>
<td>Yes</td>
<td>Details Paper 1</td>
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Details of Reasons for Soundness/ Legal Compliance:

The Core strategy is therefore unsound because: 1. It is not justified as the DPD does not show how the policies and proposals help to ensure that the objectives of sustainable waste management will be achieved; 2. It is not effective as it is not coherent with the approach to sustainable waste management contained in the Regional Spatial Strategy and the emerging ESCC Minerals and Waste Core Strategy; It is not consistent with national policy contained in PPS10 as it fails to either reflect or seek to implement the key planning objectives for sustainable waste management.
Summary of all Representations - Proposed Submission Core Strategy Regulation 27 - Report 11th July 2011

Representation ID 714
Person ID 520852 Mr Bee
Agent ID The Nevill Estate Company Limited

Proposed Submission
Core Strategy

Sound □ Yes □ No □ Justified □ Effective □ Consistent with national policy
Legally Compliant □ Yes □ No

Details of Reasons for Soundess/ Legal Complaince:
Omission of issues in relation to business, tourism and renewable energy

Details of Changes to be Made:

Representation ID 715
Person ID 520852 Mr Bee
Agent ID The Nevill Estate Company Limited

Proposed Submission
Core Strategy

Sound □ Yes □ No □ Justified □ Effective □ Consistent with national policy
Legally Compliant □ Yes □ No

Details of Reasons for Soundess/ Legal Complaince:
Support general principles which provide a well considered update to the existing adopted Local Plan

Details of Changes to be Made:

Representation ID 718
Person ID 521073 Mr Maunders
Agent ID 521070 Mr Maunders
Agent ID Mr Maunders J Barnett
Agent ID Charles Maunders Consultancy Ltd

Proposed Submission
Core Strategy

Sound □ Yes ✔ No □ Justified ✔ Effective □ Consistent with national policy
Legally Compliant ✔ Yes □ No

Details of Reasons for Soundess/ Legal Complaince:
All proposed housing allocations shouldbe tested through the publication/consultation of the Site Allocations DPD before such areas are proposed/allocated in the Core Strategy

Details of Changes to be Made:
All proposed housing allocations should be tested through the publication/ consultation of the Site Allocations DPD before such areas are proposed/Allocated in the Core Strategy
Details of Reasons for Soundness/ Legal Complaince:
There seems to be a lack of a holistic view of what our communities should look like in the future. Unless there is the funding available for new schools and local facilities like libraries and places where people can meet in the evenings and at weekends, we will just create dormitory settlements where people come home at night, shut their door, and disappear after breakfast in the morning. That is neither sustainable environmentally not desirable from a social point of view.

Details of Changes to be Made:
Details of Reasons for Soundess/ Legal Complaince:

I am writing in response to the consultation on the Local Development Framework and following discussions during our Transport and Environment Lead Member’s meeting at County Hall yesterday. You may be interested to know that the revised conclusion and recommendation, stressing that the Core Strategy is sound, was accepted without question. During the meeting I raised several points about the Sustainability Appraisal. Let me start by saying that I fully appreciate the pressures on planning authorities and have been clear throughout my discussions with colleagues and the public that Wealden District Council have the difficult task of balancing genuine housing need with a host of influences which include developers who are concerned with making money and the priorities of planning inspectors which may be far away from those of local people. The appraisal document includes the spatial vision which states its purposes as ‘protecting and enhancing its essential rural character and high quality environment and promoting the countryside as a resource for recreation and tourism.’ Whilst I have no difficulty with these aims I suggest that the most important function of the countryside particularly in East Sussex is food production. I am sure you are aware that Article 5 of The European Directive 42 of 2001 sets out requirements for a Strategic Environmental Assessment (SEA) to address a range of subjects including environmental evolution if the LDF were not implemented; current environmental aspects; problems in respect of a range of environmental conditions which include water supply and waste, soil and habitat; social, environmental and economic effects and monitoring measures. Turning to the sustainability issues under the environment heading, the appraisal cites two documents as evidence in its support of sustainable use of land: East Sussex in Figures (ESiF) and the Annual Monitoring Report (AMR). ESiF is a data set which I do not believe could be taken as evidence in itself. The existence of one document can not be construed as evidence for sustainability in another. The AMR does offer some analysis and evidence and significantly points out DefRA’s assessment of the Weald as a water stress area. I believe that the only way to achieve best evidence of sustainability in respect of land use would be to evaluate the extent to which the environmental objectives set out in the assessment (pp29 and 30) have been met so far. Since agriculture in all its forms is a major economic, social and environmental feature of our county I suggest that the requirements of Directive 42 cannot be met without a thorough evaluation of the consequences of building on greenfield sites which are being or could be farmed. Such an evaluation should, I suggest, include an assessment of the yield per acre for different crops according to the grade of the land. In this way the true worth of farmland can be determined in terms of its potential productivity. This ‘true worth’ can then be weighed against the need for other uses, such as housing, where, if built, its true worth as farmland would be lost forever. The EU Directive is not optional; it has legal status and must be fully addressed. An SEA is mandatory for plans which are prepared for agriculture, forestry, fisheries, energy, industry, transport, waste and water management, telecommunications, tourism, town and country planning or land use and which set the framework for future development consent.

Details of Changes to be Made:

There are solutions to the building pressures on the South East and these must include regeneration of those parts of the country which are currently unpopular and I will continue to ask our MPs to work towards this within the scope of the localism agenda. More immediately, the production of food and provision of water are essential to our well-being and I ask you to ensure the issues I raise concerning sustainable land use within the context of the sustainability appraisal are addressed in full.
Summary of all Representations - Proposed Submission Core Strategy Regulation 27 - Report 11th July 2011

Representation ID
1543
Person ID 105986
Mrs Rudin
Agent ID
Forest Row Parish Council
Proposed Submission
Core Strategy
Sound ☐ Yes ☐ No ☐ Justified ☐ Effective ☐ Consistent with national policy
Legally Compliant ☐ Yes ☐ No
Details of Reasons for Soundess/ Legal Complaince:
We feel that within the logistical constraints of the exercise, the consultation process has been good. However, it has to be recognised that on the whole, the wealth of information contained in the many volumes of documents is not conducive to easy participation in the process. It is requested that the Parish Council be advised as to why both their and the Community's well-considered views have been seemingly ignored as this may discourage participation in future consultations and would not bode well for the new Localism Bill.

Details of Changes to be Made:

Representation ID
1544
Person ID 104179
Mr Harper
Agent ID 339545
Mr Wilford
Proposed Submission
Core Strategy
Sound ☑ Yes ☐ No ☐ Justified ☐ Effective ☐ Consistent with national policy
Legally Compliant ☐ Yes ☐ No
Details of Reasons for Soundess/ Legal Complaince:
3.0 CONCLUSION 3.1 In conclusion, these representations demonstrate the majority of the Evidence Base supports the Proposed Submission Core Strategy which we therefore find to be largely ‘sound’, but also identifies where amendments could be made to strengthen its ‘soundness’. 3.2 We have suggested specific proposed amendments to the following policies: · WCS 5: Managing the Release of Housing Land; and, · WCS 8: Affordable Housing. 3.3 We have commented, but not proposes specific amendments, on the following issues: · Vision and Spatial Planning Objectives; · Policy WCS1: Provisions of Homes and Jobs 2006-2030; · Policy WCS2: Distribution of Housing growth; · Policy WCS3: Distribution of Employment (B Class) and Retail (Convenience and Comparison); · Policy WCS4: Strategic Development Areas; · Heathfield Area Strategy; and · Key Diagram and Errata dated 24 February 2011 3.4 In relation to Heathfield, the Proposed Submission Core Strategy is considered to be ‘sound’. The direction of growth has been suitably tested and considered ‘justified’, ‘effective’ and ‘consistent with National Policy’ (including emerging) as well as adhering to PINS Guidance. However, the overall requirement for new allocations should be reviewed in the light of a lack of evidence relating to ‘committed sites’. 3.5 The direction of growth in Heathfield is considered ‘deliverable’ within the phasing timescales as set out within the CS. Furthermore, site specific technical reports/surveys have been undertaken by Summertree Estates Ltd., to confirm the ‘deliverability’ of ‘the Site’. We therefore consider the Core Strategy is ‘effective’ in this respect. 3.6 Consultation has been undertaken with Heathfield and Waldron Parish Council who recognise the benefits development in this location could bring to the wider community. It is envisaged ‘the Site’ would deliver much needed Affordable Housing and would have good linkages to the Town Centre. 3.7 The Infrastructure Delivery Plan identifies no ‘critical’ infrastructure provision is require to deliver the Strategy in Heathfield. The Evidence Base provides for a clear audit trail which identifies the alternative options tested for Heathfield. This is considered a sound approach as it meets the ‘justified’ tests of PPS12. 3.8 In reviewing the CS and the Evidence Base relating to growth in Heathfield, we consider the CS is ‘sound’ in its approach. However, as set out in these representations, we consider specific amendments could be made to improve the overall ‘soundness’ of the CS. With this in mind we, therefore, request to attend and participate (where necessary) at the subsequent Examination Hearing Sessions.

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<td>Person ID</td>
<td>Mrs Rudin</td>
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<tr>
<td>105986</td>
<td>Forest Row Parish Council</td>
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<tr>
<td>Core Strategy</td>
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<td>☐ Yes ☑ No ☐ Justified ☐ Effective ☐ Consistent with national policy</td>
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<td>Legally Compliant</td>
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<tr>
<td>Details of Reasons for Soundess/ Legal Complaince:</td>
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<td>In the context of the Masterplan Survey carried out within tight timescales and at great effort, we are extremely disappointed to note that not only has our &quot;vision&quot; not been included in the Summary of Town Masterplanning Documents Background Paper, but that the spirit of the conclusions reached in the report on the Forest Row Matersplan have plainly been ignored.</td>
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<tr>
<td>Person ID</td>
<td>Ognjanovic</td>
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<tr>
<td>522137</td>
<td>Polegate Town Council</td>
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<td>Figure 3 page 53 of the Development of the proposed submission core strategy background paper (broad locations Polegate and Willingdon) shows development north of the bypass which Polegate Town Council Opposes.</td>
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<td>Details of Changes to be Made:</td>
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<td>Please note Polegate Masterplan was adopted on 27 September 2010 not on 5 August 2010 as stated in the summary of Town Masterplanning Documents Background Paper.</td>
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</table>
Summary of all Representations - Proposed Submission Core Strategy Regulation 27 - Report 11th July 2011

Representation ID
284
Person ID Mr Tutt
Agent ID 521554

Proposed Submission
Core Strategy

Sound ☐ Yes ☑ No ☑ Justified ☐ Effective ☐ Consistent with national policy
Legally Compliant ☑ Yes ☐ No

Details of Reasons for Soundess/ Legal Complaince:
As an Eastbourne resident I have no desire to interfere with an adjoining Council's plan other than where it impacts upon Eastbourne. In that context I wish to object to two elements of the plan. 1. Plans to provide dwellings to the South of the Stone Cross railway line. The reason for this is that I believe that it is important for both authorities to ensure that there is a clear "green belt" between the two areas which clearly demonstrates where one Council ends and the next begins. The plans for this area would remove this "green belt" and take away an important rural area between the two authorities. 2. Plans to develop on Hindslands Playing fields. I oppose this as I believe that there is clear evidence that this area is required as a recreational/leisure facility and whilst I accept the importance of housing, to provide this without the correct community infrastructure this causes more problems. In this locations such problems will impact upon both Wealden and Eastbourne as many residents in this area will look to Eastbourne (as the nearest large town) for these facilities which will put pressure upon existing provision. David Tutt

Details of Changes to be Made:
The removal of development plans both south of Stone Cross and at Hindslands

Representation ID
282
Person ID Dr Evershed
Agent ID 106106

Proposed Submission
Core Strategy

Sound ☐ Yes ☑ No ☑ Justified ☑ Effective ☑ Consistent with national policy
Legally Compliant ☐ Yes ☑ No

Details of Reasons for Soundess/ Legal Complaince:
Following the Cala Homes (South) legal case on 10 November 2010 the judge found that the Government did not have discretionary powers to revoke the Regional Strategies. Therefore, the South East Region Spatial Strategies apply and the Wealden District Council must comply with the requirement for the number of houses to be built as set out by the South East Region Plan. The current proposals fall short of these and are thus illegal and not consistent with national policy. The Government has estimated a population growth for the Wealden District of 19,000 over the plan period - which could equal to demand for 16,800 houses according to Cllr Roy Galley. The proposed Core Strategy falls well short of this expected demand. The reason given by Cllr Galley (in an interview with Rushlake Green parishoners) for the proposals falling short of demand is that the Council does not have adequate plans to improve the infrastructure. Any effective Core Strategy would include proposals to improve the infrastructure. These proposals do not and are therefore ineffective.

Details of Changes to be Made:
To make the Core Strategy sound requires the Core Strategy to increase the planned increase in the number of houses to 16,800 to meet demand. The Core strategy should also include proposals to improve the infrastructure in line with the increase in the number of houses. To meet the increase in the number of houses to be built, a revised Core Strategy should increase the number of houses planned to be built in several towns, in particular there is scope to do this in Heathfield, around the Tilsmore area close to the town centre.
Summary of all Representations - Proposed Submission Core Strategy Regulation 27 - Report 11th July 2011

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<th>Details of Reasons for Soundess/ Legal Complaince:</th>
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<tr>
<td>305</td>
<td>Mr Hatfield</td>
<td>J J Hatfield &amp; Co Ltd</td>
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I have examined the Proposed Submission Core Strategy (PSCS) against the Soundness Tool and found it wanting in terms of justification and effectiveness. The PSCS is a carefully prepared document, well thought out to offer a plan for the future but it does not take full account of the background research and documentation upon which it is based. In particular the proposals to expand Hailsham to the north do not comply with the sustainability or infrastructure objectives for Wealden and the proposals for development to the east and north of Hailsham are contrary to previous WDC research and to current Background Papers. Participation The consultation process has permitted all interested parties to engage but the options for answering have been strictly limited on a Yes or No basis when, in fact, more discursive answers are needed. Research/Fact Finding The content of the PSCS is not justified by the evidence, particularly in respect of infrastructure and especially highways and sewerage. Document No 7 Infrastructure Position Statement dated July 2009 refers under (A) Transport to the need to reduce traffic distances. The PSCS shows strategic development to North and East Hailsham and towards Hellingly at distances from the town centre of up to 2.2 km. The South Wealden & Eastbourne Transport Study (SWETS) in paragraph 3.29 makes it clear that development for major housing allocations in north and east Hailsham would cause significant traffic pressure. Fewer pinch points and reduced traffic pressure are shown for development south of Hailsham. BP No 11 Infrastructure Delivery Plan defines the highways issue for development to the north and east as ‘CRITICAL’ and states ‘Development is contingent on delivery of this infrastructure’. Regarding sewerage/waste water capacity, as outlined in BP No 11, Hailsham North wastewater works had a consented discharge capacity at 1st Jan 2007 at 2900 dwellings. Hailsham South wastewater works had a capacity of 2400 dwellings at same date. This same document shows infrastructure developments in the Appendix for the North water treatment works is deemed CRITICAL to deliver 1500 dwellings. In the south of Hailsham ‘A scheme is not necessary to deliver the proposed Submission Core Strategy. However a scheme may be required for windfalls of housing and employment development.’ The same Background Paper states under ‘Further Supporting Evidence’: ‘Infrastructure is not necessary to achieve the full allocation of development in Hailsham, Polegate and Stone Cross as shown in the proposed Submission Core Strategy.’ This reliance on ‘massing’ in the north of Hailsham therefore has infrastructure issues which could be avoided by reducing the size of the Strategic Development Areas and spreading the housing to the south of the town. According to the Housing Needs Assessment the greatest number of low income families are located to the south and such development would help to balance with Affordable and mixed housing. The Table at the end of BP 11 sets out water treatment for extant Planning Permissions and completions from April 2006-April 2010 and states that there are capacity issues arising in the north from the Spatial Strategy but not in the south. The Conclusions to BP 11 state that wastewater funding has been secured from Offwat for works in 2012 to increase capacity in the Hailsham area and to undertake a study to investigate other technical solutions. The financial solution would be via appropriate developer contributions. In summary, therefore, according to BP11 there are no capacity issues in South Hailsham providing development is not beyond 2400 houses, less 885 already approved – namely 1515 dwellings in Polegate, Stonecross and South Hailsham. The Oaklands/Brickfield SHLAA site 100/1310 (224 dwellings) includes an East Sussex County Council approved road scheme to allow capacity for up to 300 dwellings. Landscape In January 2001 WDC prepared the ‘Low Weald Towns Sector Appraisal Landscape’ as part of the Background Papers for the then Local Plan Review. This document is partly incorporated in Background Paper No 6 Green Infrastructure. BP 6 does not include the following relevant paragraph about the landscape around Hailsham: ‘South of Hailsham: ….Urban Influence: On the western side of the sector the urban edge of Hailsham is generally well concealed by woodland often in deep ghylls or valleys. Scattered farms and houses are linked by a network of roads and lanes, the latter often sunk between high overgrown hedges. Horse grazing is common, a reflection of urban pressures, and as a result many of the pastures have the unkempt rather untidy appearance of paddocks. Rough sheds, water troughs and other paraphernalia are common place. ..’ Under the heading ‘Sensitivity to Development’ the Landscape Appraisal states: ‘The relatively open aspect of the landscape east of the Cuckmere flood plain makes it sensitive to change by new development and any large scale expansion of the built form beyond the existing urban edge of Hailsham in this location would tend to damage the rural setting of the town. .. ‘ However there is very little scope for additional development on the western edge of the sector without threatening the intrinsic qualities of the landscape and more particularly the rural settings of Hellingly and Horselunges Manor. Importantly the urban influence of Hailsham is hardly noticeable in this reach of the Cuckmere valley apart from some ribbon development along the A271 on the immediate fringes of the town. Any significant expansion of the built form in
this location (Hellingly/North Hailsham) would be likely to erode the historic landscape, structure and rural character of this valuable landscape and irreparably damage the vulnerable gap of countryside between Hailsham and Hellingly.' The Sustainability Appraisal sets out on p 42 the Sustainability Objectives for Wealden. The environmental objectives include: 7. 'To make the most efficient use of land by prioritising brownfield sites for development, the re-use of existing buildings and promoting higher development densities.' 11. 'To conserve, enhance and make accessible for enjoyment the District’s countryside (in particular protecting the best and most versatile agricultural land) landscape, historic and built environment.' 12. 'Reduce the need to travel by car and promote alternative methods of transport.' Development north and east of Hailsham is contrary to all or most of these objectives because it would increase travel distance, increase reliance on motor cars and damage the landscape and countryside, being on greenfield sites. SHLAA site 100/1310 Oaklands & The Brickfield are on a previously developed site, the Brickfield being defined as 'Brownfield'. Oaklands, being used for business ‘horsey culture’ and not agriculture is also classified as ‘brownfield/previously developed’ under PPS3. Development of these sites south of Hailsham therefore complies with the environmental objectives set out in the Sustainability Appraisal. Alternatives The Council’s chosen approach in the PSCS is therefore not the most appropriate given the reasonable alternatives and it goes against the Background Papers and existing evidence base. It would appear from the PSCS that sustainability considerations have not informed its content from the start. In particular, it is stated at Para 6.30 of the PSCS that the Polegate, Willingdon, Stonecross development of 700 dwellings can only take place when formal road infrastructure is in position. Therefore SD4 is not programmed to start until 2019/20. Similarly, Para 5.16 states that the proposed northern urban extension of Hailsham (SD2 & SD3) cannot occur without infrastructure improvements namely sewerage and roads. Hence SD2 cannot start until 2017 and SD3 until 2021. I would submit that this issue of roads indicates that, by definition, the Strategic Development Areas forming the northern extension of Hailsham towards Hellingly and those in Polegate, Willingdon and Stone cross are unsustainable. The PSCS was initially prepared in its Draft and Consultation forms on the basis of the requirements of the South East Plan. This is now being abandoned and will no longer be valid. Because the Draft Core Strategies and most of the evidence gathering and Background Papers were prepared in accordance with the South East Regional Plan, the current PSCS is probably invalid and I would submit that the Inspector should examine this. Delivery The Council has correctly identified the main issues that the PSCS is seeking to address but does not present a clear vision for Wealden District into the future, only the equivalent of a ‘wish list’ of construction of 400 houses a year and sufficient commercial development for employment. It does not clarify how to achieve this, particularly in respect of infrastructure. The major strategic development north and east of Hailsham introduce an unacceptable risk in the ability to provide the infrastructure. Cross boundary issues have not been adequately addressed. In particular with Mid Sussex District Council and associated County Council Highways liaison for a relief road around East Grinstead. Nor does it address the problems of coalescence between Polegate, Willingdon and Stonecross and Eastbourne Councils, nor does it address the cross boundary issues which will arise with Lewes District Council, particularly in connection with development around Uckfield. The PSCS sets out objectives in terms of construction and development but does not connect these in sufficient detail with the necessary infrastructure. The most obvious gap in the policies is related to transport, in that the entire PSCS is predicated on continued and developing use of motor vehicles, there being no positive action proposed in relation to the Uckfield-Lewes Railway line and only passing mention of the possibility of public transport or reinstated railway from Hailsham southwards to Polegate and Eastbourne. The timescales given in the Plan are governed by the moribund South East Plan and are not realistic, particularly in respect of infrastructure provision and especially given the proposals in the PSCS for development north of Hailsham which will rely on the motor car. This is contrary to Spatial Planning Objective 7. Currently the Strategic Development Areas SD2, SD3, SD4, SD6 & SD7 are all undeliverable as set out in Paras 3.16, 6.19 & 6.31 due to lack of existing highways infrastructure. This amounts to 2650 dwellings which cannot be delivered. Flexibility It is not clear whether the PSCS will be flexible enough to respond to a variety of, or unexpected changes in, circumstances, whether environmental, political or economic. Currently there is no clear plan for updating it. It cannot be very flexible because of the infrastructure constraints in Wealden District. Summary The PSCS does not explain how its key policy objectives will be achieved because it is based on the South East Plan which is being abolished. Most of the supporting documents are also based around the South East Plan and pre-date its abolition. The proposals for Strategic Development having north and east of Hailsham and in Polegate, Willingdon & Stonecross are all undeliverable because of lack of highways infrastructure and, in the north, due to lack of sewerage capacity. These proposals therefore contradict Wealden’s own sustainability and environmental objectives. The PSCS does not take proper account of some sites in the SHLAA which are recognised as suitable and which meet sustainability objectives better than those selected for ‘Strategic Development’. The Oaklands and Brickfield site south of Hailsham (SHLAA 100/1300: 224 dwellings) is largely on previously-developed (brownfield) land and has a highways scheme for the Ersham Road/South Road/ Diplocks Way junction agreed with East Sussex County Council and should be included in the SDAs to the exclusion of less suitable development. It meets the Hailsham Sustainability Objectives, being a local Urban Extension within walking distance of Hailsham town centre and offering proximity to open space, woodland and biodiversity – at a scale capable of delivering up to 224 dwellings with minimum impact on infrastructure and environmental amenity. This PSCS has given careful consideration to the issues within the Wealden area but falls short of achieving deliverability because of a decision to favour massing over locality, with all the consequent risks involved in reliance on a minimum number of SDAs and with an intention to release more greenfield sites than is compliant with government recommendations. I welcome the
Review and monitoring procedures inherent in the PSCS but this document is currently unsound.

Details of Changes to be Made:
Strategic Developments SD2, SD3, SD4, SD6 & SD7 should be abandoned or reduced in order to meet sustainability objectives and urban extensions should be added around the south side of Hailsham including SHLAA site 100/1310.

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<tr>
<td>310</td>
<td>Mr Hayward</td>
<td>521800</td>
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Proposed Submission
Core Strategy

Sound ☑ Yes ☐ No ☐ Justified ☐ Effective ☐ Consistent with national policy
Legally Compliant ☑ Yes ☐ No

Details of Reasons for Soundess/ Legal Complaince:
Not applicable

Details of Changes to be Made:

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<tr>
<td>315</td>
<td>Lovatt Smith</td>
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Proposed Submission
Core Strategy

Sound ☐ Yes ☑ No ☐ Justified ☑ Effective ☐ Consistent with national policy
Legally Compliant ☐ Yes ☑ No

Details of Reasons for Soundess/ Legal Complaince:
There has been a lack of publicity to Wealden District residents to the degree where many that I know are unaware of the existence of and/or implications of this proposal. The title "Core Strategy" itself is confusing since it does not describe what the document really is (a plan for development of the District for the next 18 years).

Details of Changes to be Made:
There should have been a leaflet sent out to every household in the District summarising the main points of the document, with summary maps showing where new housing is proposed (not done). There should have been full-page articles in the local papers to similar effect during (not done). The name of the document should have been more accurate eg "Proposed Wealden District Development Plan to 2030".
Details of Reasons for Soundess/ Legal Complaince:

I reserve my position as to whether the core strategy is legally compliant. That may well be determined by other factors rather than this specific representation. It is argued that it is unsound in so far as WCS6 - Rural Areas Strategy - is concerned for the reasons stated below.

Details of Changes to be Made:

In WCS6 - Rural Areas Strategy - ten dwellings are allocated to Selmeston which is classed as a neighbourhood Centre. The Parish Meeting's view is that this is an incorrect classification based on a wrong understanding of the facilities currently offered by the local shop on the A27 and that the village should have been classed as an unclassified rural settlement. I support that view. I also have concerns whether ten new dwellings in this village - some 20% increase in dwellings in the centre - is justified and sustainable particularly given the poor access to the wider road network via The Street and the very difficult junction at the A27. A lesser number would have been preferable.
The very late change in favour solely of allocation SD4 did not allow local communities and their representatives proper time to make representations on the proposal and the evidence which is said to support the allocation nor District Councillors to consider it. On that basis it may not be legally compliant. The proposal is not justified on the evidence base, the local community does not support it, and it is unlikely to be found to be sustainable.

These comments relate to allocations in areas SD4 and SD5 Polegate, Willingdon and Stone Cross have been put together in one strategy. All three places are very different as was recognised in the Non Statutory Wealden Local Plan when the District Council accepted that the town of Polegate and the village of Willingdon are distinctly different communities. Stone Cross was not then even thought about as being linked with the other two separated as it is by Willingdon levels from Willingdon. The confusion over the differences between Polegate and Willingdon is demonstrated in the Paragraphs from 6.21 onwards which seem to be on a “mix and match” basis which results in a confusing, incomplete and an inaccurate summary of the communities. The proposed policies clearly state that Polegate is earmarked for additional growth, not Willingdon. In Paragraph 6.30 reference is made to “land south of Polegate and east of Willingdon” which seems to have been an attempt to disguise what is actually proposed. The land at SD4 is almost entirely in the Parish of Willingdon which is inconsistent with the stated strategy for growth in Polegate. It is stated that the strategy is not seeking to change the character of Wealden but proposal SD4 seeks to change the character of Willingdon with a likely remote and separate settlement from the rest of Willingdon of 700 dwellings created on Mornings Mill Farm and Hindsland Playing Fields and 8,600 square metres allocated for business use. Very little business use currently exists in Willingdon which has a high retired population. That is inconsistent. Even with this large allocation the wish to provide leisure, recreation and community facilities which are certainly needed from “planning gain” would seem to be unsustainable. Despite the lack of capacity on the A2270 to take any more traffic, all vehicular access to this site is proposed from the A2270 at Lower Willingdon. It is said that promoting a quality bus corridor and better road/rail transport integration and small alterations to some junctions is all that is necessary to increase the capacity of the A2270 to provide the extra capacity needed. This is not a sustainable argument. The SWETS document was not fully examined by District Councillors at their meetings when they supported this allocation nor even available until virtually the last moment. There are no proposals for a green gap to remain between Polegate and Willingdon, and the frontage along the A2270 and there is no support for the long stated wish of Willingdon residents for Hindsland Playing Fields to be used by the community. There can be no confidence that proposals for educational facilities, improvements to the current inadequate medical provision and sewerage disposal will be brought forward to support this allocation. With regard to proposal SD5, if implemented this will block any possibility of any development at or near Mornings Mill Farm being linked by road to the Dittons area of Polegate to access the main road network. To fill this gap at present is premature until the future road network in this area becomes clearer. If the Honey Farm appeal is successful the numbers allocated to Polegate will need to be reviewed so this allocation and others in this area should not be set until the appeal is determined. If the allocation SD4 is found to be unsustainable in the future that will leave a shortfall in the overall numbers allocated. SD4 should be deleted and the allocation made in line with the primary strategy for growth in Polegate. If SD4 is not deleted, SD5 should not be confirmed to leave open the possibility of road links to Dittons.
Proposed Submission
Core Strategy

Sound ☐ Yes  ☑ No  ☑ Justified  ☑ Effective  ☐ Consistent with national policy
Legally Compliant ☐ Yes  ☑ No

Details of Reasons for Soundess/ Legal Complaince:
I reserve my position as far as whether or not the Core Strategy is legally compliant. The change to solely advocating SD4 was very much a last minute change which resulted in no proper scrutiny at District Council, by local representatives nor the communities over the proposal and the supporting documents. The proposal is not justified on the evidence base and is not likely to be sustainable.

Details of Changes to be Made:
These representations relate to the Core Strategy in so far as they affect Polegate and Willingdon specifically allocations SD4 and SD5 and Stone Cross SD6. There are many references to Polegate and Willingdon as one settlement, as for example Paras 3.3 Table 1, 3.11, SPO6, WCS2, WCS3, 5.13, 6.21, 6.31 (2), Figure 8 and Figure 12. In particular, Figure 2 - settlement hierarchy, shows Polegate and Willingdon as one settlement, yet details other settlements individually. The summary document states the ‘strategy proposes significant growth within Hailsham and Uckfield with additional growth at Stone Cross and Polegate.’ and declares ‘the best options focused growth on Uckfield, Polegate and Hailsham.’ The area identified in SD4 is site specific rather than a more general area and refers to Hindsland Playing Fields and Mornings Mill Farm, where only a very small part of the overall allocation is in Polegate. Area SD4 is not directly linked by road to Polegate and it is said it is intended vehicular access will be via the Eastbourne Road at Lower Willingdon. This, therefore, is inconsistent with the declared aim for growth at Polegate. Para 2.2 states that ‘each settlement has its own unique characteristics and functions, depending on its location and historical influences.’ The wording in Chapter 17 of the Non Statutory Wealden Local Plan refers to "distinctively different communities". Development of the SD4 area could either force two settlements (Willingdon and Polegate) to merge for the first time east of the A2270, thus destroying the unique characteristics referred to or more likely result in a remote settlement in Willingdon. There is no indication that the important green gap on that side of the A2270 between the built up areas of Willingdon and Polegate is to be preserved. Para 7.23 states ‘in order to maximize the benefits, policy places the emphasis on the creation and maintenance of linkages between green spaces.’ Para 2.21 states ‘the strategy is not seeking to change the character of Wealden but this is exactly what this proposal will do to Willingdon - change its character - particularly with encouragement of extensive business use where none currently exists. Community facilities are proposed in an area sufficiently remote from most of the village to need transport to access them. The area proposed for development is viewed from the South Downs National Park and there are clear views over it from the Butts Lane area of the South Downs. The proposed new development will fill much of the currently open land beyond the build up area of Willingdon which will clearly be seen from the National Park. Planning Policy Guidance 17: Planning for open space, sport and recreation para 17.10 states ‘existing open space, sports and recreational buildings and land should not be built on unless an assessment has been undertaken which has clearly shown the open space or the buildings and land to be surplus to requirements.’ The Core Strategy refers frequently to the lack of suitable recreational facilities so even if an assessment had been carried out the land is not surplus, so the proposal to develop an existing one (Hindslands) (SD4) is inconsistent. Para 6.22 refers to the ‘limited range of facilities available locally’, and states ‘a new GP surgery and medical centre has recently been granted planning consent in Willingdon.’ This is a change from the original draft wording that stated the centre would be built. There is now considerable doubt whether it will ever be built at this location. Given that uncertainty the adequate provision of, what even the doctors say is currently unsatisfactory, medical infrastructure cannot be sound. Para 6.23 states ‘the A2270 running through the urban area is still heavily congested and traffic flows on the strategic road network are very high.’ Numerous references are throughout the strategy to the need for infrastructure, and 5.16 states ‘development at SD4 will be phased to commence from 2019 to enable integration of development in relation to transport infrastructure requirements and interventions in South Wealden.’ The impact of the number of additional vehicles from this proposed development will have a very bad effect on the already heavily congested road network of the A2270 and surrounding roads in Lower Willingdon. With the very limited changes proposed to junctions the policy is unsound and needs further examination. It is not understood how a quality bus service would improve matters. These proposals were not properly examined by the District Council because it was only at the very last moment that a decision was made to promote solely SD4 and the very late arrival of the SWETS document. Local residents and their representatives did not have the opportunity to comment. If the A2270 is found not to be suitable for the large numbers of vehicular movements arising from this proposal the alternative access is from the Dittons area of Polegate. The employment provision SD5 will effectively remove any possibility
of accessing the Mornings Mill Farm area from the east. Concern is expressed about whether adequate provision has been made for additional places at the primary and secondary schools in the local vicinity of SD4. Extensions to the existing schools which are in heavily built up areas with heavy congestion on the roads is not the answer. The strategy appears to be unsound. Para 6.28 states ‘development will only be allowed if it can be accommodated by the existing works, unless an alternative location for the treatment and discharge of waste water is implemented.’ There appears to be undue reliance on this infrastructure being provided and if it and other infrastructure is not provided the whole allocation at SD4 fails. There appears no fall back position should this be the case and that will make the whole core strategy unsound in terms of numbers of dwellings to be built. Para 7.2 states ‘the fundamental principle is that development that generates a need for infrastructure or enhancements to existing infrastructure will only be permitted if the necessary infrastructure to support it is either already in place, or there is a reliable mechanism to ensure that it will be provided at the right time, when it is needed.’ Given the history of difficulties in providing the necessary infrastructure to support development there is little confidence that development will not be allowed in the future without the infrastructure being in place first. There have to be questions whether the policies relating to infrastructure are sound. With regard to the overall housing numbers proposed, if the Honey Farm planning appeal (APP/C1435/A/10/2130580) is successful, this will increase your numbers of dwellings in the Polegate and Willingdon area to above that proposed. There is no fall back position and in housing numbers terms the Core Strategy is unsound. On the basis of the evidence and supporting information the allocation SD4 should be deleted and replaced with a policy for growth in Polegate in line with the overall policy. If SD4 is not deleted, SD5 should be put on hold and until the final layout of the road network to adequately support development of SD4 is determined. With regard to SD6 the proposal does not appear to have taken account of the effect on the residents in the adjoining area within the Borough of Eastbourne. Any development south of the railway line will need to be accessed through the congested narrow estate roads in Langney. That part of the allocation needs to be reconsidered for housing development.

Representation ID
336

Person ID  Miss Moralee
521896   Hailsham Town Council

Agent ID

Proposed Submission Core Strategy

Sound ☑ No ☐ Justified ☑ Effective ☐ Consistent with national policy

Legally Compliant ☑ Yes ☐ No

Details of Reasons for Soundess/ Legal Complaince:
The Proposed Submission Core Strategy Development Plan is consistent with the Hailsham and Hellingly Masterplan however it is unsound as the 700 homes and employment provision to be built in North Hailsham can only be built if the highways infrastructure capacity is improved to support the development which is very questionable according to the Infrastructure Delivery Plan. There is no detailed contingency plan available to show where the development would be placed if the highways infrastructure cannot be improved. The Town Council believes that a co-ordinated development of the 1300 homes and employment provision on the site to the East of Battle Road will result in a better opportunity to deliver the infrastructure for the development area, and the Town Council would request that a sixth form college is included in the infrastructure of the development to meet the identified needs of the expanding town.

Details of Changes to be Made:
The Town Council believes that a co-ordinated development of the 1300 homes and employment provision on the site to the East of Battle Road will result in a better opportunity to deliver the infrastructure for the development area, and the Town Council would request that a sixth form college is included in the infrastructure of the development to meet the identified needs of the expanding town.
Representation ID
338

Person ID  Miss Moralee
521896  Hailsham Town Council

Agent ID

Proposed Submission
Core Strategy

Details of Reasons for Soundness/ Legal Compliance:
The Proposed Submission Core Strategy Development Plan is unsound and not effective as the sewerage
treatment works are already operating at full capacity and will not support the proposed 1300 dwellings and
employment provision. In section 4 of the Core Strategy Infrastructure Delivery Plan, table 3, it is stated that it is
critical that there is additional capacity at the existing water treatment works to enable the delivery of the 1300
dwellings. There is no contingency plan submitted showing where the shortfall of any homes will be placed if not
achieved in this location.

Details of Changes to be Made:
A contingency plan must be drawn up to identify alternative development sites for Hailsham if it is found that there
is no additional capacity at the water treatment works.
The degree of uncertainty at this point would suggest the need for further work to be undertaken in order to delivery by the HA. Even as developer funded schemes there are risks – the need for third party land for example. are not certain to be delivered. The improvements required consist of; the signalisation of the Cophall roundabout, improvements to the A27/A22 and improvements to the A27/A2270 none of which are not currently scheduled for in Polegate and Willingdon are identified as critically dependent on SRN junction improvements which, at present, Delivery Policies Core Strategy Infrastructure Delivery Plan (IDP) We are concerned that a number of allocations development in Uckfield instead stating that a scheme will be considered within the Site Allocations DPD. 7. Core are concerned that at this stage, relevant supporting evidence is not included to demonstrate deliverability in transport terms. 5. Spatial Strategy Policies We note that with respect to housing land supply the council has should be provided throughout the Core Strategy to demonstrate deliverability particularly in transport terms. We are particularly SP07 and SP14 which aim to reduce the reliance on private car journeys by closely relating development to sustainable transport infrastructure and making best use of previously developed land. This accords with the principles of PPG13 and could help reduce the impact of development on the SRN. It is important that the spatial planning objectives are shown to be deliverable in accordance with PPS12. Relevant evidence should be provided throughout the Core Strategy to demonstrate deliverability particularly in transport terms. We are concerned that at this stage, relevant supporting evidence is not included to demonstrate deliverability in transport terms. 5. Spatial Strategy Policies We note that with respect to housing land supply the council has decided not to continue with the SE Plan target of 11,000 dwellings but to reduce the target to 9,600. The plan period has also been amended from 2026 to 2030 with further details of specific allocations being included in the Site Allocations DPD. Although we acknowledge that it is acceptable practice to defer detail of non-strategic housing allocations to the Site Allocations DPD we will expect sufficient detail to be included in the Core Strategy to allow an assessment to be made of the likely impact of development. Paragraph 5.7 states that the use of brownfield land for housing development is likely to reduce from 80% to 35% over the plan period. This implies that there will be an increased reliance on greenfield land for future development. PPG 13 Paragraph 6(3) identifies the importance of locating development 'principally within urban areas' to promote accessibility. Greenfield land sites may not have existing sustainable transport infrastructure to support development. To ensure that the development at such sites is deliverable in transport terms we would expect sustainable transport infrastructure to come forward alongside development in locations where a need is identified. Paragraph 5.19 states that contingency arrangements have been identified in the event of infrastructure constraints preventing housing development on identified sites. Whilst this demonstrates flexibility in accordance with PPS12, it would be helpful to know those arrangements so we can advise whether they too have implications for the SRN that could affect deliverability. 6. Local Spatial Implications of the Strategy We are generally supportive of plans to promote sustainable transport connections within the development areas particularly the A2270 and A259 quality bus corridors between Eastbourne and Hailsham / Polegate which could help reduce the congestion on the A27 by improving connectivity and providing a viable alternative to car based travel. We are concerned however that in some development areas transport appears to be being considered as an afterthought. For example, the Core Strategy does not appear to provide any details regarding the transport measures needed to mitigate the impact of development in Uckfield instead stating that a scheme will be considered within the Site Allocations DPD. 7. Core Delivery Policies Core Strategy Infrastructure Delivery Plan (IDP) We are concerned that a number of allocations in Polegate and Willingdon are identified as critically dependent on SRN junction improvements which, at present, are not certain to be delivered. The improvements required consist of; the signalisation of the Cophall roundabout, improvements to the A27/A22 and improvements to the A27/A2270 none of which are not currently scheduled for delivery by the HA. Even as developer funded schemes there are risks – the need for third party land for example. The degree of uncertainty at this point would suggest the need for further work to be undertaken in order to
develop the schemes beyond the ‘concept’ stage as detailed in the IDP (Appendix A) and demonstrate deliverability. In accordance with PPS12 Paragraph 4.52, in order for the Core Strategy to be sound it must demonstrate that the plan is deliverable. To be deliverable the infrastructure needs, costs and funding sources should be identified. At present, the Core Strategy does not demonstrate sufficiently that the transport infrastructure required to deliver the Core Strategy allocations is deliverable and as such the plan is at risk of not being found sound in its current form. Transport It is noted that the Core Strategy does not contain a separate transport policy. Spatial Planning objective SP07 aims to reduce the need to travel by car. It is therefore recommended that a policy is developed to detail the overarching transport strategy for Wealden and how the objective will be achieved. It is also advised that the policy covers road safety together with Transport Assessment and Travel Plan requirements for new development.

Details of Changes to be Made:

<table>
<thead>
<tr>
<th>Representation ID</th>
<th>Person ID</th>
<th>Agent ID</th>
<th>Proposed Submission</th>
<th>Core Strategy</th>
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</thead>
<tbody>
<tr>
<td>351</td>
<td>Mr Richards</td>
<td>521905</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Sound: No
Legally Compliant: No

Details of Reasons for Soundess/ Legal Complaince:
It is unjustifiable to classify Stone Cross as a "service centre" (3.3 Table 1). It has only six shops, a medical centre, a pub, a church and two halls. The facilities (garage, post office?) are otherwise non-existent, jobs are very limited and would generally mean travel to Eastbourne or Hailsham. There are bus services and Polegate station is relatively close - but again travel is involved. Effectiveness requires "sound infrastructure delivery planning" but detail is absent. Residential developments in Stone Cross are often with only a single entry point which makes them almost inaccessible for bus operation.

Details of Changes to be Made:

<table>
<thead>
<tr>
<th>Representation ID</th>
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<th>Agent ID</th>
<th>Proposed Submission</th>
<th>Core Strategy</th>
</tr>
</thead>
<tbody>
<tr>
<td>433</td>
<td>Wealden Councillors for Crowborough</td>
<td>521960</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Sound: No
Legally Compliant: No

Details of Reasons for Soundess/ Legal Complaince:
Cross reference of facilities and services There is a lack of cross-referencing or joined-up thinking in the Core Strategy between topics such as transport, education and employment. Nowhere do there seem to be any imaginative proposals for public transport which might enable people to access higher education or wider employment possibilities, particularly to the south of Crowborough. Currently, people access these facilities by private car or not at all and a visionary Core Strategy should be the opportunity to improve this situation.

Details of Changes to be Made:
**Representation ID**
438

**Person ID**  Mr  Barr  
**Agent ID**  522020

**Proposed Submission**  
Core Strategy

**Sound**  ☑️ Yes  ☑️ No  ☑️ Justified  ☐ Effective  ☐ Consistent with national policy

**Legally Compliant**  ☑️ Yes  ☐ No

**Details of Reasons for Soundness/ Legal Complaince:**

My site is on flat ground with woodland to the south and east and access to the west with no risk of flooding. Coopers Green Road, with all services in the road, runs alongside the site. In addition, one hectare would be available for amenity use.

**Details of Changes to be Made:**
The parish of Buxted has good transport links with mainline railway and the A272 through the village with plenty of amenity use for walking, rambling etc.

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**Representation ID**
478

**Person ID**  Gunner  
**Agent ID**  334978

**Proposed Submission**  
Core Strategy

**Sound**  ☐ Yes  ☑️ No  ☐ Justified  ☑️ Effective  ☐ Consistent with national policy

**Legally Compliant**  ☐ Yes  ☐ No

**Details of Reasons for Soundess/ Legal Complaince:**
The basic premise that development should not (generally) be allowed in neighbourhood centres and other unclassified settlements mitigates against the sustainability for which we aim. These are the very places which are most appropriate for the establishment and nurture of sustainable communities, able to provide for themselves or locally of food, energy and appropriate employment without having to import so much from further afield. Expanding larger centres increases their need for a greater transport and logistical infrastructure to bring in all those most vital things which they are unable to provide for themselves and renders the whole structure more fragile and more susceptible to disruption.

**Details of Changes to be Made:**
Allow or even encourage rural (and indeed urban) communities which are substantially self sufficient or exporting in energy, food, care, employment etc.
Summary of all Representations - Proposed Submission Core Strategy Regulation 27 - Report 11th July 2011

Representation ID
483

Person ID  Mr Elphick
514654

Agent ID

Proposed Submission
Core Strategy

Sound  ☑ Yes  ☐ No  ☐ Justified  ☑ Effective  ☑ Consistent with national policy

Legally Compliant  ☑ Yes  ☐ No

Details of Reasons for Soundess/ Legal Complaince:
Q.4 & Q.5 - covered by the following representation from Ringmer PC This Development Plan Document (DPD) is of interest to Ringmer Parish Council (RPC) because the parish adjoins the Wealden District Council area. The most significant consequence of this is that most traffic passing through Ringmer Parish, form whatever direction, will either have been generated in, or will be going to Wealden. This will also be true for Earwig Corner and Malling Hill, where traffic jams are common place, despite the Beddingham Bridge. A summary of the DPD shows 1) Housing development is to be concentrated in Uckfield (1000 new houses + employment opportunities); Hailsham (1200 new houses partly dependent on road works + employment opportunities); Polegate / Stonecross (1350 new houses partly dependent on road works + employment opportunities) 2) There will also be limited housing opportunities elsewhere, principally in Heathfield (160) and Crowborough (300) 3) Housing is focussed on ‘providing houses with good access to work in London, Brighton and Eastbourne as well as local employers’. 4) ‘It may be possible to limit any adverse impact on congestion, particularly on the A27, with an even distribution.’ (Are you thinking of the B2122 and B2192, we wonder?). Also ‘significant funds would be needed to deliver necessary improvements to the A27’. 5) ‘The combined allocations in Uckfield, Forest Row and Crowborough may help support the long term case for establishing a rail link to Lewes’. (the rail route remains protected) 6) On Gypsies the policies include: not in AONBs (therefore not in SDNP either); not near refuse sites; not in areas of high flooding risk; but near a bus route. (The last three appear to disqualify Laughton – the application there has been withdrawn). For Ringmer therefore there will be some increase in traffic through the village unless the A27 is improved, which is unlikely. However the bigger problem remains – even more congestion at Earwig Corner. The lack of significant development at Heathfield is good news. In conclusion, we are concerned at a lack of a joined-up approach, not least at County level, to prevent pushing traffic problems into adjoining Councils’ areas. Building more houses for out – commuters cannot be deemed to be sustainable by any measure, but building them so that commuters sit in traffic jams polluting the neighbourhood is so much worse. Ideally the extra houses should be built in Eastbourne, Brighton and London, but at the very lease, the A27 needs to be upgraded so there is a strong incentive to actually use the main arterial road.

Details of Changes to be Made:

Representation ID
484

Person ID  Mrs Blaber
521969

Agent ID

Proposed Submission
Core Strategy

Sound  ☑ Yes  ☐ No  ☐ Justified  ☑ Effective  ☑ Consistent with national policy

Legally Compliant  ☑ Yes  ☐ No

Details of Reasons for Soundess/ Legal Complaince:
National Policy (i) Government policy to give priority to re-use of previously used land – little consideration given to this and no consideration given to the adjoining area of Eastbourne which in the current economic climate has the potential for providing housing by re-use of shops, offices and other commercial premises. (ii) Not effective because General Dev. Principles (Wealden Local Plan 2005) (f) “protecting recreational area and other public and private open spaces” violated in proposed land development at Hindsland (Willingdon). (iii) Not effective because does not adhere to Wealden Local Plan 2005 (Part d) “Protecting development which would lead to the coalescence of settlements and to the loss of individual identities”. Not taken into account in proposed extension to Polegate / Willingdon leading to loss of identity between Eastbourne / Willingdon and Polegate. (iv) Little consideration given to the fact that the areas bordering the National Park will come under pressure from the demand for second homes in the area. No Council strategy to deal with protection of housing.

Details of Changes to be Made:
Polegate Town Council (PCT) draws attention to the following inconsistencies in the Proposed Submission Core Strategy. 1. PTC is concerned at the numerous references to Polegate and Willingdon as one settlement as highlighted in 3.3 Table 1, 3.11, SP06, WCS2, WCS3, 5.13, 6.21, 6.32(2) Figure 8 and Figure 12. In particular Figure 2 showing settlement hierarchy, places Polegate and Willingdon as one settlement, yet details other settlements individually. 2. The Summary of Town Master planning Documents Background Paper 6.4 states that the Masterplan was adopted on minute number 9410 on 27 September 2010. 3. 2.2 acknowledges that 'each settlement has its own unique characteristics and functions, depending on its location and historical influences'. PCT believes development of the SD4 area will force two settlements (Willingdon and Polegate) into one, thus destroying the unique characteristics referred to. 4. 2.21 declares ‘the strategy is not seeking to change the character of Wealden’. PTC believes development of the SD4 area will force two settlements (Willingdon and Polegate) into one thus changing the character of the area. 5. Figure 3 page 53 of the Development of the proposed submission core strategy Background Paper (broad locations Polegate and Willingdon) shows development north of the bypass, which Polegate Town Council opposes. 6. Planning Policy Guidance17: Planning for open space, sport and recreation 17.10 states 'existing open space, sports and recreational buildings and land should not be built on unless an assessment has been undertaken which has clearly shown the open space or the buildings and land to be surplus to requirements.' the Core Strategy refers frequently to the lack of suitable recreational facilities, so the plan to build on an existing one (SD4) is inconsistent. 7. Chapter 17 Paragraph 17.1 of the Wealden non statutory plan states that 'Polegate and Willingdon are adjacent but distinctively different communities located at the foot of the South Downs to the north of Eastbourne. 'However the proposed Core Strategy is likely to merge the two settlements for the first time on the east side of the A2270. PTC makes the following observations in regard to the Polegate and Willingdon and Stone Cross Area Strategy: 1. The urban extension designated SD4 extends across land within both PTC and Willingdon and Jevington Parish Council boundaries. PTC is concerned as to exactly where the development is planned, and how it will impact on the separate Councils in Polegate and Willingdon. 2. 6.22 refers to the 'limited range of facilities available locally' and states 'a new GP surgery and medical centre has recently been granted planning consent in Willingdon'. As this scheme’s progression is in question PCT question whether the medical infrastructure proposed is sound, being in mind the uncertainty of the location of current and future surgeries. 3. 6.23 states 'the A2270 running through the urban area is still heavily congested and traffic flows on the strategic road network are very high'. Numerous references are made throughout the strategy to the need for infrastructure, and 5.16 states 'development at SD4 will be phased to commence from 2019 to enable integration of development in relation to transport infrastructure requirements and interventions in South Wealden'. PTC has serious concerns over the impact of any additional vehicles on the heavily congested road network, and feel that the proposed transport strategy in unsound because of the numbers of extra vehicles any development would bring onto the A2270. 4. 6.29 states that the provision of housing in Polegate would allow for opportunities to maximize the potential for shopping provision within the town centre of Polegate. Polegate Town Council feel this statement is flawed in that it is more likely that residents would use the road system to access Eastbourne retail facilities. What is the potential for shopping provision within Polegate town centre, when elsewhere the document states there is a physical constraint on the High Street. 5. 6.31.4 does not make it clear how this development of services and improvement of the High Street will be achieved. 6. 7.2 states 'the fundamental principle is that development that generates a need for infrastructure or enhancements to existing infrastructure will only be permitted, if the necessary infrastructure to support it is either already in place, or there is a reliable mechanism to ensure that it will be provided at the right time, when it is needed.' PTC is concerned whether this fundamental principle will be applied prior to the commencement of any development. PTC has no confidence that necessary infrastructure will be provided in the future, as this has not been the case with the Wealden Local Plan and the Wealden non statutory plan, development has been allowed without the infrastructure being in place. 7. WCS7 states ‘the release of land for development will be conditional upon there being sufficient capacity in the existing local infrastructure to meet the requirements generated by the proposed development.’ PTC seeks assurances that this condition will be enforced prior to the commencement of any development. PTC raises the following questions in regard to the Proposed Submission Core Strategy: 1. 5.16 states ‘development at south Polegate and east Willingdon will be phased to commence from 2019 to enable integration of development in relation to transport infrastructure requirements and interventions in South Wealden. If these infrastructure requirements are not completed by 2019, how will this impact on any development within
Polegate. 2. 6.28 states 'development will only be allowed if it can be accommodated by the existing works, unless an alternative location for the treatment and discharge of waste water is implemented'. What assurances can be provided to PTC that the existing works are suitable? What options have been explored for alternative locations? 

3. 7.23 states 'in order to maximize the benefits, policy places the emphasis on the creation and maintenance of linkages between green spaces.' What assurances can be provided to PTC that this policy will be applied to protect and maintain the existing green space at Hindsland playing fields which separates the town of Polegate from the parish of Willingdon and Jevington? 4. WSC13 states 'development proposals will not be permitted which would result in the loss of existing open space or harm to Wealden's network of green spaces unless measures are incorporated within the development that will either mitigate the effects of development or alternative and suitable provision is made that is accessible, of good quality and value to its users, in an appropriate location, at an appropriate scale and nature and would positively contribute to the overall network of green space.' If SD4 is developed for housing, what alternative and suitable provision is the District making available to the residents of Polegate? This area has always been seen as an important green gap between Polegate and Willingdon. 5. PTC is seriously concerned about the lack of provision is being made to relieve the pressure on the oversubscribed primary and secondary schools in the local vicinity of SD4 and is opposed to the continuing extensions to the existing schools. PTC believes that the strategy is unsound in that it does not provide the appropriate school infrastructure for an increased population and is unlikely to provide sufficient places for that increase within the Polegate area. 6. If the planning appeal APP/C1435/A/10/2130580 Honey Farm is successful, the whole allocation would no longer be relevant or necessary and the policy in housing numbers terms would be unsound.

Details of Changes to be Made:

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<tr>
<th>Representation ID</th>
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<th>Agent ID</th>
<th>Details of Reasons for Soundess/ Legal Complaince:</th>
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<tbody>
<tr>
<td>1622</td>
<td>107745</td>
<td>102625</td>
<td>Supplementary documents have been submitted but not attached, and may be viewed at the Council offices on request. It has been identified above that there is insufficient housing allocated in the Core Strategy and that the distribution of that housing is not appropriate. In respect of soundness the Core Strategy fails because it has been shown in this report that the chosen approach is not the most appropriate as there is an alternative which is more sustainable. The Sustainability Appraisal has failed to properly consider alternatives, in particular in respect of properly testing total housing numbers and deliverability. This is the result of improper analysis of the infrastructure constraints. Also the Core Strategy is unsound in respect of Government targets on greenhouse gases and the provision of affordable homes. The proposed amendments will make the Core Strategy sound although it should be noted that an early review is recommended in respect of housing numbers.</td>
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Details of Changes to be Made:
Details of Reasons for Soundess/ Legal Complaince:
Sustainability Appraisal. the Sustainability Appraisal sets out 22 Outcomes which the CS is seeking to achieve. Using the number system on pages 9 to 15 of the SA set out below is an analysis of how the CS has failed to meet the outcomes. 1. Insufficient housing to meet the affordability outcome. 2. Likely to result in reduced health and well being of the population due to lack of affordable and market homes at affordable prices. 3. Social inclusion will be inhibited as house prices rise and those on lower incomes are forced out of Wealden. 8. Air pollution will be worse under the Core Strategy because the distribution of housing is car based. 9. Reduction in green house gases will not be possible because the housing distribution is not based on the public transport network. 12. Reducing the need to travel by car will not be achieved see 8 and 9 above. 20. Failure to provide sufficient new family housing will reduce the number of skilled workers available. 22. No provision in the plan to support the development of a dynamic, diverse and knowledge based economy. Overall the SA includes many detailed statements which are not supported by facts. The key points which lead to errors making the Core Strategy unsound have been dealt with below

Details of Changes to be Made:
Details of Reasons for Soundess/ Legal Complaince:

"Supplementary documents have been submitted but not attached, and may be viewed at the Council offices on request". Infrastructure Delivery. The Infrastructure Delivery Plan is not a coherent document. As it has been produced changes have been made which have not been carried through to the supporting text. This is particularly the case in respect of wastewater treatment in South Wealden. The Council in the IDP identified Nature Conservation, transport, wastewater treatment and secondary education in particular at Uckfield as critical to ensuring housing delivery. These topics are dealt with below followed by other infrastructure delivery in relation to the proposed increase in housing numbers. 1.6.1 Nature Conservation. In respect of the Ashdown Forest mitigation is proposed which the Council and Natural England are satisfied will allow the amount of housing proposed by the Council to be built without detriment to the protected area. Whilst further housing in the north of the district is proposed as a revision. The increase in the number for North Wealden is 640 dwellings over the 20 year period. These dwellings whilst being concentrated at the key settlements can be located so as to minimise any effect on Ashdown Forest. Furthermore if necessary mitigation can be increased. 1.6.2 Transport. Appended to this document is a statement which demonstrates that transport issues in South Wealden where it is proposed that the majority of the increased housing will be located are not critical to delivery. In fact by redistributing the housing closer to the Hailsham/Polegate/Eastbourne bus corridor and the mainline railway station increased headroom on the highway network will be created to accommodate the proposed increase in development in South Wealden. 1.6.3 Wastewater treatment. Appended to this document is a note which demonstrates that with appropriate controls on development in South Wealden a total of 7,618 dwellings can be built without any improvement to waste water treatment. This means that on the basis of building 350 dwellings per annum in South Wealden 22 years out of the total 24 years of the plan period can be accomplished. It is there, quite feasible that the full quantum of 8,400 homes for South Wealden can be achieved with very little risk. 1.6.4 Secondary education provision at Uckfield. The provision of all education requirements in respect of new development is well established. Nothing in the IDP suggests that either at Uckfield or at any of the towns the well tested methodology for education provision will not delivery sufficient funds to provide for the education requirements of the occupants of the new development. The SHLAA has identified enough land for 22,000 new homes and therefore land will be available where needed for new buildings. 1.6.5 Other infrastructure. Affordable housing. The shortfall in affordable housing provision has been noted above and can only be rectified by increasing the amount of housing to be built. It is recommended that at least 13,200 homes are provided over the plan period and that the Council should commit to an early review to establish whether more housing can be built. Education. See above. Social Infrastructure. Identified needs can be met. Green Infrastructure. Identified needs can be met. Public Services. Identified needs can be met. Health. identified needs can be met. Utilities. Identified needs can be met.

Details of Changes to be Made:
Details of Reasons for Soundness/ Legal Complaince:
Southern Water owns and manages Bewl Reservoir – a strategic water resource. The reservoir lies partially within Wealden District and serves large parts of Kent and East Sussex in addition to Wealden District. This water resource is used by both Southern Water and South East Water which supplies water to Wealden District. As foreshadowed in Wealden’s Core Strategy Spatial Development Options document, enlarging Bewl reservoir is one of the strategic options which may need to be implemented within the planning horizon of Wealden’s Core Strategy; therefore it is vital that this option is recognised in said strategy. Due to the planned revocation of the South East Plan there is an increased need in Southern Water’s opinion, for a policy statement that supports the planning and delivery of strategic infrastructure within Wealden that is required to meet demand arising outside the district. The omission of a policy or text recognising the potential need for this expansion renders the core strategy unsound. Wealden's Core Strategy is not effective due to the lack of recognition of the potential need and mechanism for supporting the enlargement of Bewl Reservoir.

Details of Changes to be Made:
The following sentence should be added to policy WCS7 to facilitate delivery of utility infrastructure, and to phase development with provision of necessary infrastructure.: “The provision and delivery of additional utility infrastructure (water, wastewater, energy, communications) will be encouraged and permitted in order to meet the identified needs of the district. We believe this policy will make the Core Strategy sound because it will support delivery of utility infrastructure required to serve the planned development i.e. it will be effective.

Details of Reasons for Soundness/ Legal Complaince:
New and improved wastewater infrastructure will be necessary to serve the development proposed in the Core Strategy to 203. the need for this infrastructure is not recognised in the Core Strategy, despite previously highlighting this issue. There is therefore a lack of policy to facilitate delivery of utility infrastructure. We are therefore unable to support the Core Strategy as sound on the grounds that it is not effective because it does not support delivery of utility infrastructure required to serve the proposed new development.

Details of Changes to be Made:
The following sentence should be added to policy WCS7 to facilitate delivery of utility infrastructure, and to phase development with provision of necessary infrastructure.: “The provision and delivery of additional utility infrastructure (water, wastewater, energy, communications) will be encouraged and permitted in order to meet the identified needs of the district. We believe this policy will make the Core Strategy sound because it will support delivery of utility infrastructure required to serve the planned development i.e. it will be effective.
Representation ID
1721
Person ID  Ms  Harrison
Agent ID  Southern Water
Proposed Submission
Core Strategy
Sound  ☑ Yes  ☑ No  ☑ Justified  ☑ Effective  ☐ Consistent with national policy
Legally Compliant  ☐ Yes  ☐ No

Details of Reasons for Soundness/ Legal Complaince:
Infrastructure delivery plan. Southern Water is unable to support the Core Strategy as sound because the infrastructure delivery plan, in particular the schedule at Appendix A is incomplete. This is contrary to PPS12, which says that the core strategy should identify the infrastructure required to support it. The omissions relate to odour mitigation and sewerage infrastructure. We are therefore unable to support the Core Strategy as sound, on the basis that it is: Not justified as it does not take into account the evidence provided. Not effective as it does not consider all of the requirements to successfully deliver the planned development.

Details of Changes to be Made:
We propose the addition of three rows to the infrastructure delivery schedule and suitable amendments to the relevant site specific chapters of the infrastructure delivery plan to ensure internal consistency.

Representation ID
1738
Person ID  Mr  Wheeler
Agent ID  Maresfield Conservation Group
Proposed Submission
Core Strategy
Sound  ☐ Yes  ☐ No  ☐ Justified  ☐ Effective  ☐ Consistent with national policy
Legally Compliant  ☐ Yes  ☐ No

Details of Reasons for Soundness/ Legal Complaince:
Transport Infrastructure Many villages in rural areas, including Maresfield, suffer severe environmental damage from high levels of speeding traffic. We wish to see specific policies introduced to provide for better management and traffic diversion where appropriate to protect village centres and particular mention should be made to the already prepared Transport Plan for Maresfield which has been adopted by the Parish Council and is to be incorporated in the Parish Plan.

Details of Changes to be Made:

Representation ID
1739
Person ID  Mr  Wheeler
Agent ID  Maresfield Conservation Group
Proposed Submission
Core Strategy
Sound  ☐ Yes  ☐ No  ☐ Justified  ☐ Effective  ☐ Consistent with national policy
Legally Compliant  ☐ Yes  ☐ No

Details of Reasons for Soundness/ Legal Complaince:
Conservation Areas We note that the proposed submission makes little or no reference to Conservation Areas even though earlier consultation documents did. We wish to see specific policies introduced to provide for better protection and enhancement of Conservation Areas, such as Maresfield.

Details of Changes to be Made:
Details of Reasons for Soundess/ Legal Complaince:

Herstmonceux C of E Primary School would not be able to accommodate any significant increase in pupil numbers; the present Year 1 class already has 39 children and who started in the school in September 2009, exceeding the ESCC guidelines of 30 pupils. The problems associated with these high numbers both in teaching and of physical space will continue through the subsequent school life of these children. This point was also raised in the Parish Council’s response to the Spatial Options Consultation in August 2009, which noted that the ESCC Report on Primary Schools 1 May 2009 stated that the current site of the school is too small for the pupil numbers and it has insufficient outside space for the children. There are no current plans to build or expand the school to proved extra school spaces for new families.

Details of Changes to be Made:

Yes
Sound
No
Justified
Effective
Consistent with national policy
Legally Compliant
Yes
No

Details of Reasons for Soundess/ Legal Complaince:

Hailsham Community College, the nearest secondary school to Herstmonceux Parish has already been identified in an ESCC report as being too small for the current size of the college intake. Current building programmes in Hailsham will increase the pressure on space at the college, and so the issue of school capacity should be addressed with some urgency. Herstmonceux Parish Council is concerned that contributions under S106 Agreements for the acquisition of land and contributions for building costs for both a new secondary and a primary school in Hailsham have been returned to developers. Based on 2009 figures East Sussex County Council had stated that sufficient capacity for the expected rise in school numbers could be met by an increase in class sizes or the provision of some temporary classrooms. this decision appears to contradict ESCC guidelines on class sizes and could have a negative effect on children's education. The increase in housing detailed in the Core Strategy for the period up to 2030 will generate a need for several hundred more school places, and so it is important that issue of identifying sites for new schools is undertaken urgently. The Parish Council hopes that as approximately 1700 of the proposed dwellings for Hailsham are already approved, sufficient contributions will be available for the remaining 1300 to ensure an improvement in this vital infrastructure requirement for the future growth of this area. 6. Herstmonceux Parish Council supports the need for a mix of housing in the parish with a particular need for supported housing for older residents.

Details of Changes to be Made:
Details of Reasons for Soundess/ Legal Complaince:

Hailsham Community College, the nearest secondary school to Herstmonceux Parish has already been identified in an ESCC report as being too small for the current size of the college intake. Current building programmes in Hailsham will increase the pressure on space at the college, and so the issue of school capacity should be addressed with some urgency. Herstmonceux Parish Council is concerned that contributions under S106 Agreements for the acquisition of land and contributions for building costs for both a new secondary and a primary school in Hailsham have been returned to developers. Based on 2009 figures East Sussex County Council had stated that sufficient capacity for the expected rise in school numbers could be met by an increase in class sizes or the provision of some temporary classrooms. This decision appears to contradict ESCC guidelines on class sizes and could have a negative effect on children's education. The increase in housing detailed in the Core Strategy for the period up to 2030 will generate a need for several hundred more school places, and so it is important that issue of identifying sites for new schools is undertaken urgently. The Parish Council hopes that as approximately 1700 of the proposed dwellings for Hailsham are already approved, sufficient contributions will be available for the remaining 1300 to ensure an improvement in this vital infrastructure requirement for the future growth of this area. 6. Herstmonceux Parish Council supports the need for a mix of housing in the parish with a particular need for supported housing for older residents.

Details of Changes to be Made:

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Details of Reasons for Soundess/ Legal Complaince:

Water - the Parish Council repeats its concerns about the provision of water for the district which has previously suffered problems with water shortages as was shown by the need to implement hosepipe restrictions in 2006/7. The increased demand from extra housing completed since that date and by the current building schemes will add to the problems. Any measures taken to expand the capacity will take many years to implement.

Details of Changes to be Made:
For Herstmonceux I don’t believe we should build along the road from the village hall to Collins garage, we should not allow the road side to become a new row of houses. Wealden may say that they don’t like the idea of houses being built on the land towards Lime park going down the lane besides the new houses and building opposite the recreation ground, the view is not seen by the people but would be great for those in houses there, but I suggest a tiered development as enclosed. The Windmill hill plan at the monkey puzzle has enough houses; this site where the garage still stands should be a social centre for the people in the area. That’s to say accommodation for a couple of families that can be on site to have a coffee shop, library, youth club open every evening, a place for young and older people that can be for a number of events. I don’t believe this plan is deliverable, I believe that there is no evidence of neighbouring authorities coherence if they have to consider developing in a similar way to Wealden with the lack of infrastructure, the lack of water and sewage disposal, school placements and hospitals the entire county will be unbearable to live in. Whilst there has been previous consultation with this document, the final Wealden recommendation has not had enough consultation time, in order to give a detailed response. Introduction I feel that there hasn’t been enough time for proper consultation to discuss all the facts in this final document and each village should of have had its own area document, plus more than one document that could cover the whole Wealden area for example in Herstmonceux we have had one document that went round the parish councillors and the public could not see it. I went in to Hailsham Town Council to see their strategy document to find one huge document which would have taken several days to read and understand. In the introduced project the view is not seen by the people but would be great for those in houses there, but I suggest a tiered development as enclosed. The Windmill hill plan at the monkey puzzle has enough houses; this site where the garage still stands should be a social centre for the people in the area. That’s to say accommodation for a couple of families that can be on site to have a coffee shop, library, youth club open every evening, a place for young and older people that can be for a number of events. I don’t believe this plan is deliverable, I believe that there is no evidence of neighbouring authorities coherence if they have to consider developing in a similar way to Wealden with the lack of infrastructure, the lack of water and sewage disposal, school placements and hospitals the entire county will be unbearable to live in. Whilst there has been previous consultation with this document, the final Wealden recommendation has not had enough consultation time, in order to give a detailed response.

Details of Reasons for Soundess/ Legal Complaince:
For Herstmonceux I don’t believe we should build along the road from the village hall to Collins garage, we should not allow the road side to become a new row of houses. Wealden may say that they don’t like the idea of houses being built on the land towards Lime park going down the lane besides the new houses and building opposite the recreation ground, the view is not seen by the people but would be great for those in houses there, but I suggest a tiered development as enclosed. The Windmill hill plan at the monkey puzzle has enough houses; this site where the garage still stands should be a social centre for the people in the area. That’s to say accommodation for a couple of families that can be on site to have a coffee shop, library, youth club open every evening, a place for young and older people that can be for a number of events. I don’t believe this plan is deliverable, I believe that there is no evidence of neighbouring authorities coherence if they have to consider developing in a similar way to Wealden with the lack of infrastructure, the lack of water and sewage disposal, school placements and hospitals the entire county will be unbearable to live in. Whilst there has been previous consultation with this document, the final Wealden recommendation has not had enough consultation time, in order to give a detailed response.
who don’t know known the area and councillors who appear to be controlled by developers. We have the South Downs National park south of Wealden and a large area of outstanding national beauty which well mean the area Polegate, Hailsham which will be taking the majority of proposed housing. Traffic becomes grid locked twice a day; strategy plan has to be short sighted document. Schools / Education I understand that there are 700 children in Eastbourne that are unable to attend a school in Eastbourne with lack of places, with more development proposed in Wealden the case for more educational centres are needed. I understand some developers are not willing to pay the contribution to schools infrastructure; they should be told if you don’t pay, go away! Travellers It would appear again that the councillors are burying their head in the sand regarding this issue, the travelling community aren’t all bade people and with proper sites they could fit into the community, which may wish to do. If you were to see the 10 biggest crooks in Britain, you would find 9 of them living in large houses. Burial grounds There is one thing that everyone will do and that is die and there appears there is no provision to extend existing burial grounds or to build new ones. Conclusion Whilst the strategy plan will appear to have a lot of effort put into it, as it stands it would be a disaster if implemented and I would like to see the secretary of state to call in a public inquiry.

Details of Changes to be Made:
I feel that there hasn't been enough time for proper consultation to discuss all the facts in this final document and each village should of have had its own area document, plus more than one document that could cover the whole Wealden area for example in Herstmonceux we have had one document that went round the parish councillors and the public could not see it. I went in to Hailsham Town Council to see their strategy document to find one huge document which would have taken several days to read and understand. In the proposed development areas there appeared no more than a blob; the whole document needed more defined detail.

Representation ID
1760
Person ID  Mr Keeley
Agent ID
104437
Proposed Submission
Core Strategy
Sound    ☐ Yes    ☑ No    ☐ Justified    ☐ Effective    ☐ Consistent with national policy
Legally Compliant ☐ Yes    ☐ No
Details of Reasons for Soundess/ Legal Complaince:
The major defects The lack of clean water is a problem that already exists and we are already building more houses and that is without the additional that are being proposed over the next 20 years, surface water is also a problem that hasn’t been addressed and covering more land with houses and roads will increase this problem, we already have over flowing sewage problems and further development would cause an even bigger issue.

Details of Changes to be Made:
Conclusion Whilst the strategy plan will appear to have a lot of effort put into it, as it stands it would be a disaster if implemented and I would like to see the secretary of state to call in a public inquiry
Representation ID
1767
Person ID  Mr Keeley Agent ID
104437
Proposed Submission
Core Strategy
Sound  □ Yes  ☑ No  □ Justified  □ Effective  □ Consistent with national policy
Legally Compliant  □ Yes  □ No
Details of Reasons for Soundess/ Legal Complaince:
Community centre / churches On all new large developments there needs to be a place where a couple of couples could live full time that could run a coffee shop, library, youth club that can be available every evening, used for worshipping purposes.

Details of Changes to be Made:
Conclusion Whilst the strategy plan will appear to have a lot of effort put into it, as it stands it would be a disaster if implemented and I would like to see the secretary of state to call in a public inquiry

Sound  □ Yes  □ No  □ Justified  □ Effective  □ Consistent with national policy
Legally Compliant  □ Yes  □ No
Details of Reasons for Soundess/ Legal Complaince:
Roads The infrastructure for present development, let alone future development is inadequate, this making the strategy document unworkable. One hopes that the localism bill will allow the local people to have more say in the future development in Wealden and we should not be ruled by parliamentary MPs who don’t know known the area and councillors who appear to be controlled by developers. We have the South Downs National park south of Wealden and a large area of outstanding national beauty which well mean the area Polegate, Hailsham which will be taking the majority of proposed housing. Traffic becomes grid locked twice a day now on this; strategy plan has to be short sighted document.

Details of Changes to be Made:
Conclusion Whilst the strategy plan will appear to have a lot of effort put into it, as it stands it would be a disaster if implemented and I would like to see the secretary of state to call in a public inquiry
Details of Reasons for Soundness/ Legal Compliance:
Schools / Education I understand that there are 700 children in Eastbourne that are unable to attend a school in Eastbourne with lack of places, with more development proposed in Wealden the case for more educational centres are needed. I understand some developers are not willing to pay the contribution to schools infrastructure; they should be told if you don’t pay, go away!

Details of Changes to be Made:
Conclusion Whilst the strategy plan will appear to have a lot of effort put into it, as it stands it would be a disaster if implemented and I would like to see the secretary of state to call in a public inquiry

Details of Reasons for Soundness/ Legal Compliance:
Care homes Whilst this may be a county council area, Wealden should be consulting with the social services being that we have a large number of older people in the district; there is a need for care homes under my land community trust plan. There is also a need for new houses to have 2 kitchens or an annex so older people can be looked after by younger people of the family. The extra accommodation can be used to take in lodgers that are seeking accommodation or young people that need their own space.

Details of Changes to be Made:
Conclusion Whilst the strategy plan will appear to have a lot of effort put into it, as it stands it would be a disaster if implemented and I would like to see the secretary of state to call in a public inquiry

Details of Reasons for Soundness/ Legal Compliance:
Burial grounds There is one thing that everyone will do and that is die and there appears there is no provision to extend existing burial grounds or to build new ones.

Details of Changes to be Made:
Conclusion Whilst the strategy plan will appear to have a lot of effort put into it, as it stands it would be a disaster if implemented and I would like to see the secretary of state to call in a public inquiry
Details of Reasons for Soundess/ Legal Complaince:
I don’t believe this plan is deliverable, I believe that there is no evidence of neighbouring authorities coherence if they have to consider developing in a similar way to Wealden with the lack of infrastructure, the lack of water and sewage disposal, school placements and hospitals the entire county will be unbearable to live in. Whilst there has been previous consultation with this document, the final Wealden recommendation has not had enough consultation time, in order to give a detailed response

Details of Changes to be Made:
Conclusion Whilst the strategy plan will appear to have a lot of effort put into it, as it stands it would be a disaster if implemented and I would like to see the secretary of state to call in a public inquiry

Details of Reasons for Soundess/ Legal Complaince:
The plan period 2006 - 2030 is too long. PPS12 suggests at least 15 years from the date of adoption which in this case is proposed to be 2011 taking us to 2026. This coincides with the SEPlan period. The CS evidence base is too uncertain beyond this date and insufficiently robust to justify policies or to be considered effective beyond 2026

Details of Changes to be Made:
Change the plan period to 2006 - 2026. To address the deficiencies identified inQ4 above.

Details of Reasons for Soundess/ Legal Complaince:
Due to recent reductions in the range of services available it would appear that Table 1- Settlement Hierachy should be amended by changing Polgate to Local Service Centre and Pevensey Bay to Neighbourhood Center. Pevensey and Pevensey Bay should be added to the Rural Area Strategy list since both can provide some increase in housing.
Details of Reasons for Soundess/ Legal Complaince:
This paragraph should refer to the South East Plan as it forms part of the development plan, is relevant to the matters being addressed within the Core Strategy and was published following extensive formulation, consultation, participation and thorough examination by the Panel prior to the (then) Secretary of State's consideration of the Panel's Report and final publication of the modified Plan. It is a well informed, evidence based and significant part of the development plan which should be fully acknowledged and addressed within the Core Strategy.

Details of Changes to be Made:
The Core Strategy should be redrafted to refer to those directly relevant and important aspects of the South East Plan which apply to the District.
### Details of Reasons for Soundness/ Legal Complaince:

6 Sustainability Appraisal 6.1 Introduction 6.1.1 This section of our representations addresses soundness issues raised by a review of the Sustainability Appraisal (SA) of the Wealden Proposed Submission Core Strategy. In considering soundness issues relating to the SA due consideration has been given to the following: § The Town and Country Planning (Local Development) (England) Regulations 2004 (as amended in 2008 and 2009) (SI 2004 No.2204/ SI 2008 No. 1371/ SI 2009 No. 401) § EU Directive 2001/42/EC on the assessment of the effects of certain plans and programmes on the environment (the ‘SEA Directive’) § Environmental Assessment of Plans and Programmes Regulations 2004 (SI 2004 No. 1633) (the ‘SEA Regulations’) § EU Directive 92/43/EEC on the conservation of natural habitats and of wild fauna and flora (The Habitats Directive) § The Conservation (Natural Habitats, &c) Regulations 1994 (as amended 1997, 2000, 2007, 2008, 2009, 2010) § The Conservation of Habitats and Species Regulations 2010 (as amended 2011) 6.1.2 Our representations are summarised below: Section of Core Strategy: Paragraphs 1.5 to 1.7, particularly paragraph 1.6, and bullet point BP10: Sustainability Appraisal of the Proposed Submission Core StrategyLegally Compliant: -Sound: NoJustified: NoEffective: -Consistent with national policy: - 6.1.3 There a number of separate but related issues in relation to the SA which highlight that the Proposed Submission Core Strategy is not sufficiently justified. These are summarised as follows: § The justification for the preferred option for housing growth within the SA, which we consider to be inadequate. § The weight afforded to the landscape character assessment within the SA, which is considered inadequate and flawed. § SA scores for Maresfield within the SA of the Rural Settlement Hierarchy, which we consider to be inadequately justified. § The South East Plan considered that the lower growth options for the sub-region had beneficial effects in terms of lower environmental impacts, but would not address existing housing supply problems or support higher levels of economic growth. We consider therefore that the SA for the Proposed Submission Core Strategy underplays the potential economic benefits of maintaining higher levels of housing growth for Wealden. 6.2 Justification for the preferred option for housing growth using within the SA 6.2.1 The Proposed Submission Core Strategy for Wealden identifies, at para 1.6, that it contributes to “the achievement of sustainable development through Sustainability Appraisal where alternative options have been assessed against the Council’s agreed sustainability criteria, meeting the requirements of the Strategic Environmental Assessment Directive”. A key consideration in terms of soundness is that the Core Strategy needs to be ‘justified’ in that it is founded on a robust and credible evidence base and it is the most appropriate strategy when considered against reasonable alternatives. In this respect, the Sustainability Appraisal has a key role to play in showing how different options perform and demonstrating how sustainability considerations have informed the content of the Wealden Core Strategy. 6.2.2 Following the Secretary of State’s announcement of the Government’s intention to revoke Regional Strategies (27th May 2010) and a letter dated 6th July 2010 from DCLG Chief Planning Office advising on this decision, Wealden District Council has taken the decision to reduce the required number of homes in the District from 11,000 to 9,600 new dwellings. However, it is not clear how the sustainability appraisal informed this decision in light of testing against the Council’s agreed sustainability objectives. 6.2.3 Para 2.9, Figure 2.1 and Section 8 of the Sustainability Appraisal describes the approach taken in considering ‘reasonable alternatives’ for the Wealden Core Strategy. Para 8.4 of the Sustainability Appraisal identifies that an initial two scenarios, Scenarios A and B, were tested based on an allocated quantum of housing development as identified by the South East Plan (ie. 11,000 new dwellings). Reference to the Sustainability Appraisal of Spatial Development Options (July 2009) shows that a considerable amount of testing was undertaken of potential spatial distributions of the housing based on South East Plan growth levels. 6.2.4 However, a new scenario, Scenario C, developed after the Secretary of State’s announcement of the intention to revoke Regional Strategies, emerges as the preferred option for growth based on a quantum of housing development of 9,600 new dwellings. The SA includes only a brief justification for adopting Scenario C as the preferred option, describing it as having emerged later as a result of more detailed infrastructure testing and risk assessment, as well as the results of the SA of Scenarios A and B and ongoing work on the Appropriate Assessment. 6.2.5 Para 8.13 provides the only justification for Scenario C when compared to Scenarios A and B. In para 8.13 Scenarios A and B are described as “not supported by infrastructure capacity or environmental constraints”, whilst Scenario C “seeks to maximise housing delivery within acknowledged capacity constraints and directs growth to areas of need and with local aspirations”. Scenario C is deemed more beneficial overall in sustainability terms “as it places less pressure on environmental resources on infrastructure and on communities and is evidence-based at a local level using the most up to date evidence”. However, whilst the SA does include this brief justification for the reasons for selecting and rejecting these Scenarios, it does not include any analysis of these three options tested against the Council’s agreed sustainability objectives. Indeed, no further
not take sufficient consideration of the sustainability benefits of opportunities to improve social infrastructure within poor public transport links to the local secondary school in Uckfield. The SA acknowledges Maresfield will provide facilities with its centre. The population is noted as having a large component of retired and elderly people and are identified. In terms of economic factors, the SA scores Maresfield poorly in relation to workforce and limited that bus services are not suitable for working people. Some minor issues are noted in relation to crime, including the village for almost all significant services (GP, dentist, optician, hospital, banking and shopping). It also notes SA notes no GP, dispensary or dentist services available locally and that much of the population must travel out of Maresfield within the SA of the Rural Settlement Hierarchy 6.4.1 It is noted that the SA scores Maresfield poorly in comparison to the proposed Wealden Core Strategy rural settlement hierarchy. Maresfield is listed 8th in the rural settlement hierarchy for the north of the District. Notably, Maresfield scores poorly in the social sustainability hierarchy (24th out of 24) and economic sustainability hierarchy (18th out of 24). In terms of social factors the SA scores Maresfield poorly due to social exclusion and poor access to health and other services and facilities. The SA notes no GP, dispensary or dentist services available locally and that much of the population must travel out of the village for almost all significant services (GP, dentist, optician, hospital, banking and shopping). It also notes that bus services are not suitable for working people. Some minor issues are noted in relation to crime, including occasional incidents of minor vandalism and illegal driving offences. However, no major environmental constraints are identified. In terms of economic factors, the SA scores Maresfield poorly in relation to workforce and limited facilities with its centre. The population is noted as having a large component of retired and elderly people and poor public transport links to the local secondary school in Uckfield. The SA acknowledges Maresfield will provide significant employment opportunities with Ashdown Business Park soon to provide local jobs, although this does not appear to be borne out in the economic scoring for the settlement. 6.4.2 We contend that these scorings do not take sufficient consideration of the sustainability benefits of opportunities to improve social infrastructure within Maresfield or take advantage of its close proximity to a key employment site in the district. 6.5 How the SA for the South East Plan viewed the lower growth options for the sub-region 6.5.1 The option 1 South East Plan housing figures proposed 8,000 houses (equivalent to 400 per annum) to be provided within Wealden between 2006 and 2026 in the published draft Spatial Strategy. At Examination, the Inspector’s Panel revised that to 9,600 and the Secretary of State subsequently increased the figure to 11,000 new homes. 6.5.2 The SA for the South East Plan assessed three scales of regional growth, expressed in terms of annual rates of housing development for the period 2006-2026: 1. 25,500 pa (This equates to either 300 or 400 new homes for ‘Rest of East Sussex’) 2. 32,000 pa (This equates to 500 new homes for ‘Rest of East Sussex’) 3. 32,000 pa (This equates to 500 new homes for ‘Rest of East Sussex’) 6.5.3 In assessing the sustainability implication of these growth options, the SA summarises the assessment as follows: § The higher growth options (i.e. those which propose a housing growth rate of 32,000/year) were more likely to meet housing demands (and therefore ease problems of affordability) and provide for higher rates of economic growth, but would place more pressure on environmental resources, in particular transport infrastructure, water resources, land use, waste arisings, climate change etc. § The lower growth options (i.e. based on a housing growth rate of 25,500/year), conversely would have lower environmental impacts, but would not address existing housing supply problems or support as much economic growth. 6.5.4 The above comments from the SA of the South East Plan highlights the key issue with the SA of the Wealden Proposed Submission Core Strategy, namely that it underplays the potential economic benefits of maintaining the higher growth rates for the District.

**Details of Changes to be Made:**

**SUMMARY 6.2.7** In summary, we contend that the plan is unsound as it is not justified: the SA has not adequately justified the decision for selecting Scenario C over Scenarios A and B as the preferred option for housing growth. **SUMMARY 6.3.3** We therefore contend that the plan is unsound as it is not justified: justifications for the assessment of the landscape element of SA are based on a Landscape Character Assessment methodology and appraisal which is inadequate and flawed. **SUMMARY 6.4.3** In summary, we contend that the plan is unsound as it is not justified: the justifications for the scoring within the SA of the Rural Settlement Hierarchy give insufficient weight to the development opportunities in Maresfield to support improvements to local community, social, transport and educational facilities. In addition, insufficient weight has been afforded in the SA to opportunities to support business strength and economic growth in Maresfield, particularly through the adjacent Ashdown Business Park. **SUMMARY 6.5.5** In summary, we contend that the plan is unsound as the SA is not justified in that it does not take sufficient account of the economic benefits of maintaining the higher growth rates for the District.
6 Sustainability Appraisal 6.1 Introduction 6.1.1 This section of our representations addresses soundness issues raised by a review of the Sustainability Appraisal (SA) of the Wealden Proposed Submission Core Strategy. In considering soundness issues relating to the SA due consideration has been given to the following: § The Town and Country Planning (Local Development) (England) Regulations 2004 (as amended in 2008 and 2009) (SI 2004 No.2204/ SI 2008 No. 1371/ SI 2009 No. 401) § EU Directive 2001/42/EC on the assessment of the effects of certain plans and programmes on the environment (the ‘SEA Directive’) § Environmental Assessment of Plans and Programmes Regulations 2004 (SI 2004 No. 1633) (the ‘SEA Regulations’) § EU Directive 92/43/EEC on the conservation of natural habitats and of wild fauna and flora (The Habitats Directive) § The Conservation (Natural Habitats, &c) Regulations 1994 (as amended 1997, 2000, 2007, 2008, 2009, 2010) § The Conservation of Habitats and Species Regulations 2010 (as amended 2011) 6.1.2 Our representations are summarised below: Section of Core Strategy: Paragraphs 1.5 to 1.7, particularly paragraph 1.6, and bullet point BP10: Sustainability Appraisal of the Proposed Submission Core StrategyLegally Compliant: -Sound: No -Justified: No -Effective: No -Consistent with national policy: - 6.1.3 There a number of separate but related issues in relation to the SA which highlight that the Proposed Submission Core Strategy is not sufficiently justified. These are summarised as follows: § The justification for the preferred option for housing growth within the SA, which we consider to be inadequate. § The weight afforded to the landscape character assessment within the SA, which is considered inadequate and flawed. § SA scores for Maresfield within the SA of the Rural Settlement Hierarchy, which we consider to be inadequately justified. § The South East Plan considered that the lower growth options for the sub-region had beneficial effects in terms of lower environmental impacts, but would not address existing housing supply problems or support higher levels of economic growth. We consider therefore that the SA for the Proposed Submission Core Strategy underplays the potential economic benefits of maintaining higher levels of housing growth for Wealden. 6.2 Justification for the preferred option for housing growth using within the SA 6.2.1 The Proposed Submission Core Strategy for Wealden identifies, at para 1.6, that it contributes to “the achievement of sustainable development through Sustainability Appraisal where alternative options have been assessed against the Council’s agreed sustainability criteria, meeting the requirements of the Strategic Environmental Assessment Directive”. A key consideration in terms of soundness is that the Core Strategy needs to be ‘justified’ in that it is founded on a robust and credible evidence base and it is the most appropriate strategy when considered against reasonable alternatives. In this respect, the Sustainability Appraisal has a key role to play in showing how different options perform and demonstrating how sustainability considerations have informed the content of the Wealden Core Strategy. 6.2.2 Following the Secretary of State’s announcement of the Government’s intention to revoke Regional Strategies (27th May 2010) and a letter dated 6th July 2010 from DCLG Chief Planning Office advising on this decision, Wealden District Council has taken the decision to reduce the required number of homes in the District from 11,000 to 9,600 new dwellings. However, it is not clear how the sustainability appraisal informed this decision in light of testing against the Council’s agreed sustainability objectives. 6.2.3 Para 2.9, Figure 2.1 and Section 8 of the Sustainability Appraisal describes the approach taken in considering ‘reasonable alternatives’ for the Wealden Core Strategy. Para 8.4 of the Sustainability Appraisal identifies that an initial two scenarios, Scenarios A and B, were tested based on an allocated quantum of housing development as identified by the South East Plan (ie. 11,000 new dwellings). Reference to the Sustainability Appraisal of Spatial Development Options (July 2009) shows that a considerable amount of testing was undertaken of potential spatial distributions of the housing based on South East Plan growth levels. 6.2.4 However, a new scenario, Scenario C, developed after the Secretary of State’s announcement of the intention to revoke Regional Strategies, emerges as the preferred option for growth based on a quantum of housing development of 9,600 new dwellings. The SA includes only a brief justification for adopting Scenario C as the preferred option, describing it as having emerged later as a result of more detailed infrastructure testing and risk assessment, as well as the results of the SA of Scenarios A and B and ongoing work on the Appropriate Assessment. 6.2.5 Para 8.13 provides the only justification for Scenario C when compared to Scenarios A and B. In para 8.13 Scenarios A and B are described as “not supported by infrastructure capacity or environmental constraints”, whilst Scenario C “seeks to maximise housing delivery within acknowledged capacity constraints and directs growth to areas of need and with local aspirations”. Scenario C is deemed more beneficial overall in sustainability terms “as it places less pressure on environmental resources on infrastructure and on communities and is evidence-based at a local level using the most up to date evidence”. However, whilst the SA does include this brief justification for the reasons for selecting and rejecting these Scenarios, it does not include any analysis of these three options tested against the Council’s agreed sustainability objectives. Indeed, no further
justification is provided for selecting Scenario C over Scenarios A and B, apart from this brief discussion in para 8.13. 6.2.6 From the evidence provided, it is not possible to determine how Scenario C performs overall against the full range of SA criteria in comparison the higher levels of housing growth proposed in Scenarios A and B. This we suggest is a well established and sound, common sense approach to the evaluation of reasonable alternatives. The failure to evaluate and compare these three options using the SA framework of objectives demonstrates that SA does not adequately justify the selection of Scenario C against other reasonable alternatives. We therefore dispute the statement in para 1.6 of the Proposed Submission Core Strategy for Wealden that the plan contributes to "the achievement of sustainable development the Sustainability Appraisal where alternative options have been assessed against the Council's agreed sustainability criteria". 6.3 Weight afforded to the landscape character assessment within the SA 6.3.1 Consideration of landscape issues is a requirement of the SEA Directive. This is addressed in the SA of Wealden Core Strategy through the Sustainability Appraisal framework of objectives. SA Objective 11 address landscape issues alongside a range of other topic areas, including access to the countryside, and historic and built environment. Whilst this could be argued to 'water down' the landscape component, much of the SA information on landscape is drawn from a separate Landscape Study, undertaken as part of the evidence base for the Core Strategy. 6.3.2 As highlighted elsewhere in this representation (see section 7) we consider the Landscape Character Assessment and the resulting appraisal to be inadequate and flawed. Our comments on the inadequacy of the Landscape Study are relevant here as they form the direct basis for the assessment of landscape issues with the SA of the Proposed Submission Core Strategy. 6.4 SA scores for Maresfield within the SA of the Rural Settlement Hierarchy 6.4.1 It is noted that the SA scores Maresfield poorly in comparison to the proposed Wealden Core Strategy rural settlement hierarchy. Maresfield is listed 8th in the rural settlement hierarchy for the north of the District. Notably, Maresfield scores poorly in the social sustainability hierarchy (24th out of 24) and economic sustainability hierarchy (18th out of 24). In terms of social factors the SA notes no GP, dispensary or dentist services available locally and that much of the population must travel out of the village for almost all significant services (GP, dentist, optician, hospital, banking and shopping). It also notes that bus services are not suitable for working people. Some minor issues are noted in relation to crime, including occasional incidents of minor vandalism and illegal driving offences. However, no major environmental constraints are identified. In terms of economic factors, the SA scores Maresfield poorly in relation to workforce and limited facilities with its centre. The population is noted as having a large component of retired and elderly people and poor public transport links to the local secondary school in Uckfield. The SA acknowledges Maresfield will provide significant employment opportunities with Ashdown Business Park soon to provide local jobs, although this does not appear to be borne out in the economic scoring for the settlement. 6.4.2 We contend that these scorings do not take sufficient consideration of the sustainability benefits of opportunities to improve social infrastructure within Maresfield or take advantage of its close proximity to a key employment site in the district. 6.5 How the SA for the South East Plan assessed three scales of regional growth, expressed in terms of annual rates of housing development for the period 2006-2026: 1. 25,500 pa (This equates to either 300 or 400 new homes for ‘Rest of East Sussex’) 2. 28,000 pa (This equates to 400 new homes for ‘Rest of East Sussex’) 3. 32,000 pa (This equates to 500 new homes for ‘Rest of East Sussex’) 6.5.3 In assessing the sustainability implication of these growth options, the SA summarises the assessment as follows: § The higher growth options (i.e. those which propose a housing growth rate of 32,000/year) were more likely to meet housing demands (and therefore ease problems of affordability) and provide for higher rates of economic growth, but would place more pressure on environmental resources, in particular transport infrastructure, water resources, land use, waste arisings, climate change etc. § The lower growth options (i.e. based on a housing growth rate of 25,500/year), conversely would have lower environmental impacts, but would not address existing housing supply problems or support as much economic growth. 6.5.4 The above comments from the SA of the South East Plan highlights the key issue with the SA of the Wealden Proposed Submission Core Strategy, namely that it underplays the potential economic benefits of maintaining the higher growth rates for the District.

Details of Changes to be Made:
SUMMARY 6.2.7 In summary, we contend that the plan is unsound as it is not justified: the SA has not adequately justified the decision for selecting Scenario C over Scenarios A and B as the preferred option for housing growth. SUMMARY 6.3.3 We therefore contend that the plan is unsound as it is not justified: justifications for the assessment of the landscape element of SA are based on a Landscape Character Assessment methodology and appraisal which is inadequate and flawed. SUMMARY 6.4.3 In summary, we contend that the plan is unsound as it is not justified: the justifications for the scoring within the SA of the Rural Settlement Hierarchy give insufficient weight to the development opportunities in Maresfield to support improvements to local community, social, transport and educational facilities. In addition, insufficient weight has been afforded in the SA to opportunities to support business strength and economic growth in Maresfield, particularly through the adjacent Ashdown Business Park. SUMMARY 6.5.5 In summary, we contend that the plan is unsound as the SA is not justified in that it does not take sufficient account of the economic benefits of maintaining the higher growth rates for the District.
Paragraph 1.7

Sound [ ] Yes [x] No [x] Justified [x] Effective [ ] Consistent with national policy

Legally Compliant [x] Yes [ ] No

Details of Reasons for Soundness/ Legal Complaince:

6 Sustainability Appraisal 6.1 Introduction 6.1.1 This section of our representations addresses soundness issues raised by a review of the Sustainability Appraisal (SA) of the Wealden Proposed Submission Core Strategy. In considering soundness issues relating to the SA due consideration has been given to the following: § The Town and Country Planning (Local Development) (England) Regulations 2004 (as amended in 2008 and 2009) (SI 2004 No.2204/ SI 2008 No. 1371/ SI 2009 No. 401) § EU Directive 2001/42/EC on the assessment of the effects of certain plans and programmes on the environment (the ‘SEA Directive’) § Environmental Assessment of Plans and Programmes Regulations 2004 (SI 2004 No. 1633) (the ‘SEA Regulations’) § EU Directive 92/43/EEC on the conservation of natural habitats and of wild fauna and flora (The Habitats Directive) § The Conservation (Natural Habitats, &c) Regulations 1994 (as amended 1997, 2000, 2007, 2008, 2009, 2010) § The Conservation of Habitats and Species Regulations 2010 (as amended 2011) 6.1.2 Our representations are summarised below: Section of Core Strategy: Paragraphs 1.5 to 1.7, particularly paragraph 1.6, and bullet point BP10: Sustainability Appraisal of the Proposed Submission Core StrategyLegally Compliant: -Sound: NoJustified: NoEffective: -Consistent with national policy: - 6.1.3 There a number of separate but related issues in relation to the SA which highlight that the Proposed Submission Core Strategy is not sufficiently justified. These are summarised as follows: § The justification for the preferred option for housing growth within the SA, which we consider to be inadequate. § The weight afforded to the landscape character assessment within the SA, which is considered inadequate and flawed. § SA scores for Maresfield within the SA of the Rural Settlement Hierarchy, which we consider to be inadequately justified. § The South East Plan considered that the lower growth options for the sub-region had beneficial effects in terms of lower environmental impacts, but would not address existing housing supply problems or support higher levels of economic growth. We consider therefore that the SA for the Proposed Submission Core Strategy underplays the potential economic benefits of maintaining higher levels of housing growth for Wealden. 6.2 Justification for the preferred option for housing growth using within the SA 6.2.1 The Proposed Submission Core Strategy for Wealden identifies, at para 1.6, that it contributes to “the achievement of sustainable development through Sustainability Appraisal where alternative options have been assessed against the Council’s agreed sustainability criteria, meeting the requirements of the Strategic Environmental Assessment Directive”. A key consideration in terms of soundness is that the Core Strategy needs to be ‘justified’ in that it is founded on a robust and credible evidence base and it is the most appropriate strategy when considered against reasonable alternatives. In this respect, the Sustainability Appraisal has a key role to play in showing how different options perform and demonstrating how sustainability considerations have informed the content of the Wealden Core Strategy. 6.2.2 Following the Secretary of State’s announcement of the Government’s intention to revoke Regional Strategies (27th May 2010) and a letter dated 6th July 2010 from DCLG Chief Planning Office advising on this decision, Wealden District Council has taken the decision to reduce the required number of homes in the District from 11,000 to 9,600 new dwellings. However, it is not clear how the sustainability appraisal informed this decision in light of testing against the Council’s agreed sustainability objectives. 6.2.3 Para 2.9, Figure 2.1 and Section 8 of the Sustainability Appraisal describes the approach taken in considering ‘reasonable alternatives’ for the Wealden Core Strategy. Para 8.4 of the Sustainability Appraisal identifies that an initial two scenarios, Scenarios A and B, were tested based on an allocated quantum of housing development as identified by the South East Plan (ie. 11,000 new dwellings). Reference to the Sustainability Appraisal shows that a considerable amount of testing was undertaken of potential spatial distributions of the housing based on South East Plan growth levels. 6.2.4 However, a new scenario, Scenario C, developed after the Secretary of State’s announcement of the intention to revoke Regional Strategies, emerges as the preferred option for growth based on a quantum of housing development of 9,600 new dwellings. The SA includes only a brief justification for adopting Scenario C as the preferred option, describing it as having emerged later as a result of more detailed infrastructure testing and risk assessment, as well as the results of the SA of Scenarios A and B and ongoing work on the Appropriate Assessment. 6.2.5 Para 8.13 provides the only justification for Scenario C when compared to Scenarios A and B. In para 8.13 Scenarios A and B are described as “not supported by infrastructure capacity or environmental constraints”, whilst Scenario C “seeks to maximise housing delivery within acknowledged capacity constraints and directs growth to areas of need and with local aspirations”. Scenario C is deemed more beneficial overall in sustainability terms “as it places less pressure on environmental resources on infrastructure and on communities and is evidence-based at a local level using the most up to date evidence”. However, whilst the SA does include this brief justification for the reasons for selecting and rejecting these Scenarios, it does not include any analysis of these three options tested against the Council’s agreed sustainability objectives. Indeed, no further
justification is provided for selecting Scenario C over Scenarios A and B, apart from this brief discussion in para 8.13. 6.2.6 From the evidence provided, it is not possible to determine how Scenario C performs overall against the full range of SA criteria in comparison the higher levels of housing growth proposed in Scenarios A and B. This we suggest is a well established and sound, common sense approach to the evaluation of reasonable alternatives. The failure to evaluate and compare these three options using the SA framework of objectives demonstrates that SA does not adequately justify the selection of Scenario C against other reasonable alternatives. We therefore dispute the statement in para 1.6 of the Proposed Submission Core Strategy for Wealden that the plan contributes to "the achievement of sustainable development the Sustainability Appraisal where alternative options have been assessed against the Council’s agreed sustainability criteria". 6.3 Weight afforded to the landscape character assessment within the SA 6.3.1 Consideration of landscape issues is a requirement of the SEA Directive. This is addressed in the SA of Wealden Core Strategy through the Sustainability Appraisal framework of objectives. SA Objective 11 address landscape issues alongside a range of other topic areas, including access to the countryside, and historic and built environment. Whilst this could be argued to 'water down' the landscape component, much of the SA information on landscape is drawn from a separate Landscape Study, undertaken as part of the evidence base for the Core Strategy. 6.3.2 As highlighted elsewhere in this representation (see section 7) we consider the Landscape Character Assessment and the resulting appraisal to be inadequate and flawed. Our comments on the inadequacy of the Landscape Study are relevant here as they form the direct basis for the assessment of landscape issues with the SA of the Proposed Submission Core Strategy. 6.4 SA scores for Maresfield within the SA of the Rural Settlement Hierarchy 6.4.1 It is noted that the SA scores Maresfield poorly in relation to workforce and limited occasional incidents of minor vandalism and illegal driving offences. However, no major environmental constraints are identified. In terms of social factors the SA scores Maresfield poorly due to social exclusion and poor access to health and other services and facilities. The SA notes no GP, dispensary or dentist services available locally and that much of the population must travel out of the village for almost all significant services (GP, dentist, optician, hospital, banking and shopping). It also notes that bus services are not suitable for working people. Some minor issues are noted in relation to crime, including occasional incidents of minor vandalism and illegal driving offences. However, no major environmental constraints are identified. In terms of economic factors, the SA scores Maresfield poorly in relation to workforce and limited facilities with its centre. The population is noted as having a large component of retired and elderly people and poor public transport links to the local secondary school in Uckfield. The SA acknowledges Maresfield will provide significant employment opportunities with Ashdown Business Park soon to provide local jobs, although this does not appear to be borne out in the economic scoring for the settlement. 6.4.2 We contend that these scorings do not take sufficient consideration of the sustainability benefits of opportunities to improve social infrastructure within Maresfield or take advantage of its close proximity to a key employment site in the district. 6.5 How the SA for the South East Plan viewed the lower growth options for the sub-region 6.5.1 The option 1 South East Plan housing figures proposed 8,000 houses (equivalent to 400 per annum) to be provided within Wealden between 2006 and 2026 in the published draft Spatial Strategy. At Examination, the Inspector’s Panel revised that to 9,600 and the Secretary of State subsequently increased the figure to 11,000 new homes. 6.5.2 The SA for the South East Plan assessed three scales of regional growth, expressed in terms of annual rates of housing development for the period 2006-2026: 1. 25,500 pa (This equates to either 300 or 400 new homes for ‘Rest of East Sussex’) 2. 28,000 pa (This equates to 400 new homes for ‘Rest of East Sussex’) 3. 32,000 pa (This equates to 500 new homes for ‘Rest of East Sussex’). 6.5.3 In assessing the sustainability implication of these growth options, the SA summarises the assessment as follows: § The higher growth options (i.e. those which propose a housing growth rate of 32,000/year) were more likely to meet housing demands (and therefore ease problems of affordability) and provide for higher rates of economic growth, but would place more pressure on environmental resources, in particular transport infrastructure, water resources, land use, waste arisings, climate change etc. § The lower growth options (i.e. based on a housing growth rate of 25,500/year), conversely would have lower environmental impacts, but would not address existing housing supply problems or support as much economic growth. 6.5.4 The above comments from the SA of the South East Plan highlights the key issue with the SA of the Wealden Proposed Submission Core Strategy, namely that it underplays the potential economic benefits of maintaining the higher growth rates for the District. Details of Changes to be Made: SUMMARY 6.2.7 In summary, we contend that the plan is unsound as it is not justified: the SA has not adequately justified the decision for selecting Scenario C over Scenarios A and B as the preferred option for housing growth. SUMMARY 6.3.3 We therefore contend that the plan is unsound as it is not justified: justifications for the assessment of the landscape element of SA are based on a Landscape Character Assessment methodology and appraisal which is inadequate and flawed. SUMMARY 6.4.3 In summary, we contend that the plan is unsound as it is not justified: the justifications for the scoring within the SA of the Rural Settlement Hierarchy give insufficient weight to the development opportunities in Maresfield to support improvements to local community, social, transport and educational facilities. In addition, insufficient weight has been afforded in the SA to opportunities to support business strength and economic growth in Maresfield, particularly through the adjacent Ashdown Business Park. SUMMARY 6.5.5 In summary, we contend that the plan is unsound as the SA is not justified in that it does not take sufficient account of the economic benefits of maintaining the higher growth rates for the District.
Details of Reasons for Soundness/ Legal Compliance:
There is no sound justification as to why it is considered that trend-based household projections are in excess of that which could be accommodated or delivered within Wealden. To be effective the Plan should aim to provide for household needs in the District and also to have regard to wider Regional Housing need. The figures in paragraph 3.10 and Note 1 appear to be inconsistent.

Details of Changes to be Made:
Revise the text to encompass the objective referred to in Q4 above.

Details of Reasons for Soundness/ Legal Compliance:
"Supplementary documents have been submitted but not attached, and may be viewed at the Council offices on request".

Details of Changes to be Made:
REVISION SOUGHT. Delete this paragraph as it is inconsistent with the overall aims of the CS in respect of reducing the need to travel by car, climate change and several other aims. It is also unclear as to the spatial nature of the statement in respect of providing greater choice.

Details of Reasons for Soundness/ Legal Compliance:
Again support is given to the strategy that: overall the Core Strategy is not seeking to change the character of Wealden.

Details of Changes to be Made:
Paragraph 2.4 notes: Any significant change to this settlement pattern has the potential to change the way in which the settlements co-exist, and the vibrancy of our main towns. This approach is strongly supported in the context of maintaining the hierarchical dominance of the 5 main towns in particular Hailsham.

Details of Changes to be Made:

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Paragraph 2.6

The references to ‘dispersed settlement pattern’ in Wealden, with 93 per cent of the district containing half of its population are misleading, so affecting the policies derived from that thinking. It ignores the significance of nucleated villages as well as the main towns.

Details of Changes to be Made:

The settlement pattern seen as ‘dispersed’ for half of the population needs refining in the document. The proportions of those living in places larger than 500 and 1,000 should be identified. There is great scope for serving these by public transport evolving from the present network, with limited strict dependence on cars.

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Paragraph 2.7

Again support is given to the strategy of focussing growth where it is most accessible and sustainable. It is also recognised that in less sustainable locations, additional growth will simply encourage more travel and out commuting and the potential for increasing social inequality.

Details of Changes to be Made:
Representation ID
408
Person ID  Elisa Serpell
521964
Agent ID 2.7
Paragraph
Sound  ☐ Yes  ☑ No  ☐ Justified  ☑ Effective  ☐ Consistent with national policy
Legally Compliant  ☐ Yes  ☐ No
Details of Reasons for Soundess/ Legal Complaince:
The proposed distribution of new development largely to Urban extensions fails to recognise the present urban/
rural split that already exists in the District and fails to allow sufficient growth in a number of the rural settlements
Details of Changes to be Made:

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Representation ID
322
Person ID  South East Water Ltd
330894
Agent ID  Mrs Pidgeon
330880
Agent ID  Adams Hendry
Paragraph 2.11
Sound  ☐ Yes  ☑ No  ☐ Justified  ☑ Effective  ☐ Consistent with national policy
Legally Compliant  ☐ Yes  ☐ No
Details of Reasons for Soundess/ Legal Complaince:
The Core Strategy fails to acknowledge that climate change will have a ‘double impact’ on the provision of water infrastructure. On the demand side it could result in higher summer peaks and higher than average usage. On the supply side, longer drier summers could significantly reduce the deployable output of surface water resources and impact on groundwater resources. To be effective in managing the affects of climate change and therefore be sound, the Core Strategy must support South East Water in its efforts to manage water efficiency and develop new resources.
Details of Changes to be Made:
Paragraph 2.11 should include a statement that the Core Strategy will adapt and mitigate climate change by supporting water efficiency measures and the development of new water resources, where necessary. In addition, South East Water considers it imperative that the Core Strategy provides explicit policy support for necessary new water supply infrastructure, and is sufficiently flexible to deliver planned water demand and infrastructure improvements identified within the company’s statutory Water Resource Management Plan. These are improvements identified as being required to maintain the fine balance between what water is naturally available and the demand for water from customers, while supporting new development and meeting the challenges of climate change and changing environmental standards. A policy that supports the provision of additional water supply infrastructure that maintains, improves and, where necessary, expands the water supply network is considered essential by South East Water. See also comments on policy SP09 in respect of water efficiency measures and section 8.1 in respect of infrastructure planning.
Representation ID
1625
Person ID  Pelham Homes  Agent ID  Mrs Owen
107745  102625  Jennifer Owen & Associates Ltd.
Paragraph 2.8
Sound ☐ Yes ☑ No ☐ Justified ☐ Effective ☐ Consistent with national policy
Legally Compliant ☐ Yes ☐ No

Details of Reasons for Soundness/ Legal Compliance:
"Supplementary documents have been submitted but not attached, and may be viewed at the Council offices on request".

Details of Changes to be Made:
REVISION SOUGHT. Add "The district has less designated areas than its immediate neighbours." In order to make clear the background against which the total quantum of development is being made.

Representation ID
1304
Person ID  Mr Ankers  Agent ID
106660  South Downs Society
Paragraph 2.15
Sound ☑ Yes ☐ No ☐ Justified ☐ Effective ☐ Consistent with national policy
Legally Compliant ☐ Yes ☐ No

Details of Reasons for Soundness/ Legal Compliance:
The environment of Wealden we welcome the references to the high quality environment within the District, including the national park and its role in affording prospects for recreation and enjoyment.

Details of Changes to be Made:
Details of Reasons for Soundess/ Legal Complaince:
The Council state that the District has a much smaller proportion of the population in the 15-39 age range than the national average, with a significantly above average number of people of pensionable age. They note that without intervention, this age structure is set to continue with predicted increases in the proportion of the population over 75 years, and a continuing net loss of the population within the 15-24 year age range. The changing nature of household formation, means that the average numbers of persons per household is declining. On this basis, a nil increase in the net number of dwellings units would result in a decline in the resident population. The Council acknowledge that without in-migration, there will be a reduction in the District’s population with an associated detrimental impact on the economy, town centres and services. They conclude that the District requires in-migration and that this requires additional housing. Paragraph 2.20 therefore notes that there is ‘an overall increased need and demand for housing and accompanying growth’. In response, the PSCS seeks to enable the phased delivery of 400 dwellings per annum over the 24 year period of the DPD (ie 2006 – 2030). However, paragraph 5.13 notes that in the District, over the last 21 years, an average of 400 dwellings per annum have been built. Therefore the planned growth seeks to mirror exactly the level of growth that has occurred in recent years. Given the Council’s acknowledgement that housing growth is required, it is considered that a housing trajectory that merely reflects past recent completion rates is insufficient. This will compound the existing demographic structure, which the PSCS acknowledges will continue without intervention. Such a demographic profile will have a detrimental impact on the local economy and vitality of town centres and services.

Details of Changes to be Made:
Given the overall reduction in household size, and the age structure of the District it is considered that an annual growth rate of 400dpa will not result in the requisite level of in-migration and an associated demographic profile that is required to facilitate growth of the local economy, regenerate town centres and preserve local services. The proposed level of housing growth is therefore ineffective and renders the PSCS unsound. The PSCS should plan for an annual net additional housing growth rate that delivers a step change increase over the last 21 years.
Paragraph 2.19

Details of Reasons for Soundness/ Legal Compliance:
The environment of Wealden we welcome the references to the high quality environment within the District, including the national park and its role in affording prospects for recreation and enjoyment.

Details of Changes to be Made:

Yes ☐ Sound ☑ No ☐ Justified ☑ Effective ☐ Consistent with national policy
Legally Compliant ☑ Yes ☐ No

Paragraph 2.21

Details of Reasons for Soundness/ Legal Compliance:
Whilst this paragraph reveals socio-economic issues which face the District it does not refer to the severe shortage of affordable housing and likely scale of residential development necessary to support increased delivery. The Core Strategy's text should refer to this issue and cross refer to the way in which the District will tackle the need to increase delivery.

Details of Changes to be Made:
The Core Strategy needs to fully reflect the national planning policy set out within PPS 3 - Housing and this section requires further development.

Paragraph 2.21

Details of Reasons for Soundness/ Legal Compliance:
2.21 Declares "the strategy is not seeking to change the character of Wealden" PTC believes development of the SD4 area will force two settlements (Willingdon and Polegate) into one thus changing the character of the area.

Details of Changes to be Made:
Details of Reasons for Soundess/ Legal Complaince:
Object to the inclusion of Maresfield as a neighbourhood centre when it is clearly much more than this, and should be a Local Service Centre. Maresfield is much larger than the other villages in the neighbourhood centre group and contrary to the council's assessment has similar or greater facilities than most of those in the Local Service Centre group. In particular it is immediately adjacent to the Ashdown Business Park which is planned to provide 1000 jobs. It also has as many if not more shops, garages, pubs than most of the LSC Group and certainly has much more than those in the NC group. In particular if Buxted is considered a LSA where there is minimal local employment, no more shops than Maresfield, no garage, and the local shop appears to have closed, is considered an LSC then clearly Maresfield should also be in this group. Maresfield should retain a development boundary. given that the council state that one of the aims of the strategy is to limit car travel and enable people to live where they work, clearly the uniqueness of Maresfield having the large employment site next to it means much more new housing should be allowed there as well. As otherwise as things stand at the moment, with the small older retired current population in Maresfield, the vast majority of workers at the Ashdown Business Park will have to drive in from other parts of the area.

Details of Changes to be Made:
Change Maresfield to where it should be a Local Service Centre. Retain a development boundary. Allocate 300 to 400 houses to Maresfield to allow workers at the Ashdown Business Park to live where they work, and not have to travel in by car from other parts of the area.

Details of Reasons for Soundess/ Legal Complaince:
WJPC is concerned at the numerous references to Polegate and Willingdon as one settlement, as highlighted in 3.3 Table 1, 3.11, SPO6, WCS2, WCS3, 5.13, 6.31(2), Figure 8 and Figure 12. In particular, Figure 2 showing settlement hierarchy, places Polegate and Willingdon as one settlement, yet details other settlements individually.

Details of Changes to be Made:
Details of Reasons for Soundess/ Legal Complaince:
The Wealden settlement hierarchy does not adequately reflect the settlement structure in the district and, as such, it is unsound. Westham should be identified as a Service Centre due to the facilities and employment areas it contains. The hierarchy constrains positive development in lower order settlements, that may contribute to sustainable growth of the area. paragraph 3.4 should clarity that some local service centres are capable of accommodating sustainable growth.

Details of Changes to be Made:
The Wealden settlement hierarchy should be redrafted to reflect the settlement structure in the district and allow for growth to meet future economic and social needs. We consider that Westham should be allocated as a service centre due to the facilities and employment areas it contains. Paragraph 3.4 should clarify that some local service centres are capable of accommodating sustainable growth. Please see Indigo Planning letter dated 15 April 2011
4.1 Introduction

4.1.1 This section of our representations refers to the settlement hierarchy set out in the proposed submission Core Strategy. Our representation is summarised below: Section of Core Strategy: Table 1, Settlement Hierarchy Figure 2, Settlement Hierarchy, and Paras 3.2 – 3.7

Legally Compliant - Sound: No Justified: No Effective: No Consistent with national policy

Details of Reasons for Soundess/ Legal Complaince:

4.2 Issues

4.2.1 In the Core Strategy, the Settlement hierarchy is a key determinant in distributing housing growth across settlements. It has been used at all stages in the plan process. However, the terminology to describe settlements at different levels of the hierarchy has changed and the criteria have been incorrectly applied. The results of this are that Maresfield has been classified incorrectly and the potential to accommodate growth here has thus been underplayed. The issues here are thus: § The assessment of Maresfield against the criteria used to classify villages in the hierarchy has changed over time § The assessment has been inappropriately applied. It does not, in Maresfield, acknowledge the employment offer that will be forthcoming at the Ashdown Business Park, even though this has planning permissions § The assessment is static and does not allow for change or reclassification over time § Why has the classification and thus the associated potential for development changed between different iterations of the Core Strategy?

4.2.2 We present this section in chronological order, starting with the 2007 Core Strategy Issues and Options, through the 2009 Spatial Options to the 2011 Proposed Submission Core Strategy. 2007 Core Strategy Issues and Options: 4.2.3 The 2007 Draft Settlement Strategy for the Villages (Core Strategy Issues and Options Background Paper) identifies Maresfield as a local service centre and a village with growth potential. It states (para 6.49): ‘Maresfield is identified as a ‘business area’ and ‘other locally significant employment opportunities’. Maresfield receives a cross against both of these. This ignores the fact that the Ashdown Business Park, which received planning permission in 2010, is located in Maresfield. The submission Core Strategy acknowledges this at para 3.21, so why does the settlement hierarchy not take this into consideration? 4.2.4 At this time, the Council identified the potential level of growth in Maresfield as being between 350 – 500 new homes. 2009 Core Strategy Spatial Options 4.2.5 In the 2009 Rural Settlement Classification (Core Strategy Spatial Options Background Paper 6), the status of Maresfield had changed to an ‘Accessible Settlement with Limited Facilities’. The Rural Settlement Classification allocated the following amount of homes to each settlement type: § Accessible Local Service Centre: 250 dwellings § Local Service Centre: 150 dwellings § Accessible Settlement with Limited Facilities: 100 dwellings § Accessible Settlement: 40 dwellings 4.2.6 Under these criteria, Maresfield would be a location for 100 new homes. The potential level of housing development increases to 250 dwellings for ‘accessible local service centres’. There are only two criteria which differentiate an ‘accessible local service centre’ from an ‘accessible settlement with limited facilities’; the former benefitting from a GP service and a business area or ‘other locally significant employment opportunities’. Maresfield meets the second of these given the recent planning permission for the Ashdown Business Park. 4.2.7 Furthermore in Barratt’s consultation response submitted to the 2009 Core Strategy Spatial Options we stated that the inclusion of the existence of a GP surgery within the criteria is considered inappropriate as it does not recognise the functional relationships between settlements whereby villages in close proximity will share facilities which none in their own right would have the scale of population to support. PPS 3 paragraph 38 makes this point. The nearest GP surgeries to Maresfield are in Buxted and Uckfield, both of which are within 5 km of Maresfield. We would also contend that the future pattern of provision of rural GP surgeries is uncertain and not a robust basis on which to allocate development to individual settlements. Given the above, we recommended that the criteria be changed to ‘access to health care facilities by sustainable modes of travel’ rather than provision of a GP service within the settlement itself. 2011 Core Strategy Submission Draft 4.2.8 Policy WSC6 establishes that provision will be made for at least 455 new dwellings across the following categories of settlement: service centre, local service centre, neighbourhood centre and unclassified settlements. Table 1 and associated Figure 2 of the Submission Core Strategy classify Maresfield as a Neighbourhood Centre. The rationale for this is set out in Appendix 3 to the Core Strategy Background Paper 1: Development of the Proposed Submission Core Strategy (February 2011). Appendix 4 establishes how each settlement was classified. 4.2.9 We contend that the settlement classification significantly underplays the role and potential of Maresfield. Criteria for classifying settlements include presence of a ‘business area’ and ‘other locally significant employment opportunities’. Maresfield receives a cross against both of these. This ignores the fact that the Ashdown Business Park, which received planning permission in 2010, is located in Maresfield. The submission Core Strategy acknowledges this at para 3.21, so why does the settlement hierarchy not take this into consideration? 4.2.10 We have compared the assessment undertaken in the Background Paper with the draft Settlement Strategy for the Villages (July 2007, Core Strategy Issues and Options).
Options) and the Rural Settlement Classification (July 2009, Core Strategy Spatial Development Options Background Paper). In both the 2007 and 2009 classifications, Maresfield receives a tick against both ‘business area’ and ‘other locally significant employment opportunities’. There is no reason why the assessment set out in the February 2011 background paper should change this, particularly given that the Ashdown Business Park now has planning permission. 4.2.11 The Councils Employment Land review identifies the Ashdown Business Park as the most strategically significant employment site in North Wealden. It will provide in the region of 600 – 700 jobs in a mix of office and B1 light industrial space. The planning application submitted for the Business Park makes the link between housing and employment growth and contribution to sustainable patterns of development and local employment opportunities. Para 3.18 of the submission Core Strategy states ‘The strategy is aimed at increasing the opportunity for people to work close to where they live’. 4.2.12 The criteria for assessing Maresfield also include a cross against ‘provision of changing facilities’ (for sports). Again, this is incorrect. Changing facilities exist at the recreation ground – for football and cricket – and at the Bowls Club. 4.2.13 So, the question here is why has the classification of Maresfield has changed from a local centre with growth potential (in 2007) to a Neighbourhood Centre with limited potential (in 2011), bearing in mind that the criteria have effectively remained the same and that, as we point out above, the assessment actually underplays the potential of Maresfield? The justification and rationale for changing the classification of Maresfield is not clear. 4.2.14 The Core Strategy aspires to retaining the rural character and high quality environment of the district, whilst also providing sufficient growth to improve the performance of the economy, regenerate market towns and provide a more vital future for villages. 4.2.15 However, the settlement classification is static and does not allow for any reclassification of settlements during the period covered by the LDF. It does not acknowledge that villages may become more sustainable through additional population arising from new development increasing the viability of local shops and services. PPS 3 is clear here that the need for housing provision in rural areas, not only in market towns and local service centres but also in villages in order to enhance or maintain their sustainability.

Details of Changes to be Made:
SUMMARY 4.2.16 In summary, we contend that the assessment is incorrect, previous consultation responses have not been addressed and the potential for growth and change in Maresfield is being suppressed. The assessment should be reconsidered in light of the planning permission granted for the Ashdown Business Park and the potential for balancing homes and jobs in this part of the district recognised. 4.2.17 We thus contend that, on this matter, the Core Strategy is unsound, because: 1. It is not justified, as the evidence used is incorrect; and 2. It is not effective, as the boundaries are ‘static’ and thus not flexible.

Representation ID 1629
Person ID 107745
Agent ID 102625
Pelham Homes Jennifer Owen & Associates Ltd.
Settlement Hierarchy Figure 2
Sound Yes No Justified Effective Consistent with national policy
Legally Compliant Yes No
Details of Reasons for Soundess/ Legal Complaince:
"Supplementary documents have been submitted but not attached, and may be viewed at the Council offices on request".

Details of Changes to be Made:
REVISION SOUGHT .Amend to place Polegate/Willingdon as a District Centre to take into account the Secondary School at Willingdon which is spatially as close as secondary schools at Crowborough, Uckfield and Hailsham to the majority of residents in the town. also to reflect the importance of the mainline railway station at Polegate. The lack of public transport opportunities at hailsham should also be noted.
Details of Reasons for Soundess/ Legal Complaince:
Object to the inclusion of Maresfield as a neighbourhood centre when it is clearly much more than this, and should be a Local Service Centre. Maresfield is much larger than the other villages in the neighbourhood centre group and contrary to the council’s assessment has similar or greater facilities than most of those in the Local Service Centre group. In particular it is immediately adjacent to the Ashdown Business Park which is planned to provide 1000 jobs. It also has as many if not more shops, garages, pubs than most of the LSC Group and certainly has much more than those in the NC group. In particular if Buxted is considered a LSA where there is minimal local employment, no more shops than Maresfield, no garage, and the local shop appears to have closed, is considered an LSC then clearly Maresfield should also be in this group. Maresfield should retain a development boundary. given that the council state that one of the aims of the strategy is to limit car travel and enable people to live where they work, clearly the uniqueness of Maresfield having the large employment site next to it means much more new housing should be allowed there as well. As otherwise as things stand at the moment, with the small older retired current population in Maresfield, the vast majority of workers at the Ashdown Business Park will have to drive in from other parts of the area.

Details of Changes to be Made:
Change Maresfield to where it should be a Local Service Centre. Retain a development boundary. Allocate 300 to 400 houses to Maresfield to allow workers at the Ashdown Business Park to live where they work, and not have to travel in by car from other parts of the area.

Details of Reasons for Soundess/ Legal Complaince:
The Wealden settlement hierarchy does not adequately reflect the settlement structure in the district and, as such, it is unsound. Westham should be identified as a Service Centre due to the facilities and employment areas it contains. The hierarchy constrains positive development in lower order settlements, that may contribute to sustainable growth of the area. paragraph 3.4 should clarify that some local service centres are capable of accommodating sustainable growth.

Details of Changes to be Made:
The Wealden settlement hierarchy should be redrafted to reflect the settlement structure in the district and allow for growth to meet future economic and social needs. We consider that Westham should be allocated as a service centre due to the facilities and employment areas it contains. Paragraph 3.4 should clarify that some local service centres are capable of accommodating sustainable growth. Please see Indigo Planning letter dated 15 April 2011
Details of Reasons for Soundess/ Legal Complaince:

The Core Strategy is unsound because it has defined Heathfield incorrectly within the settlement hierarchy. This is unjustified. It should be viewed as a ‘District Centre’ and not as a ‘Service Centre’. The town fulfils the functions and characteristics of a District Centre as defined on Table 1. It is a far more important settlement within the district than the Council has suggested. Indeed the Council itself identifies Heathfield as one of the five main towns in the District in paragraph 2.3 of the Proposed Core Strategy and Policy SP04 which refers to “our five principle towns”. The character of the town is very different to the other Service Centres identified. It is a largely self-contained settlement, with a wide range of services and facilities, that serves a distinct part of the district. Due to the size of additional appendices they have not been uploaded but are available to view at the Council's offices.

Details of Changes to be Made:

Heathfield should be re-defined in the Settlement Hierarchy as a District Centre

Details of Reasons for Soundess/ Legal Complaince:

1. The Core Strategy is unsound because it has defined Heathfield incorrectly within the settlement hierarchy. This is unjustified. It should be viewed as a ‘District Centre’ and not as a ‘Service Centre’. The town fulfils the functions and characteristics of a District Centre as defined on Table 1. It is a far more important settlement within the district than the Council has suggested, evidenced in the Core Strategy paragraph 2.3 which identifies Heathfield as one of the five main towns in the district and in Policy SP04 which refers to “our five principal towns”. The character of the town is very different to the other Service Centres identified. It is a largely self-contained settlement, with a wide range of services and facilities that serves a distinct part of the district. Due to the size of additional appendices they have not been uploaded but are available to view at the Council's offices.

Details of Changes to be Made:

2. Paragraph 3.4 states that, “the large majority of future planned growth in Wealden needs to be focused on the towns and larger villages in the hierarchy, where facilities services and site opportunities exist. It is considered that the Council has under-estimated the current and future roles that Heathfield can play in this respect by failing to properly recognise the character and function of the town. In order to make the Core Strategy sound, Heathfield should be redefined within the Settlement hierarchy as a District Centre.
4.1 Introduction 4.1.1 This section of our representations refers to the settlement hierarchy set out in the proposed submission Core Strategy. Our representation is summarised below: Section of Core Strategy: Table 1, Settlement Hierarchy Figure 2, Settlement Hierarchy, and Paras 3.2 – 3.7Legally Compliant: NoSound: NoConsistent with national policy: YesEffective: YesJustified: Yes

Details of Reasons for Soundness/ Legal Compliance:

4.2 Issues 4.2.1 In the Core Strategy, the Settlement hierarchy is a key determinant in distributing housing growth across settlements. It has been used at all stages in the plan process. However, the terminology to describe settlements at different levels of the hierarchy has changed and the criteria have been incorrectly applied. The results of this are that Maresfield has been classified incorrectly and the potential to accommodate growth here has thus been underplayed. The issues here are thus: § The assessment of Maresfield against the criteria used to classify villages in the hierarchy has changed over time § The assessment has been inappropriately applied. It does not, in Maresfield, acknowledge the employment offer that will be forthcoming at the Ashdown Business Park, even though this has planning permissions § The assessment is static and does not allow for change or reclassification over time § Why has the classification and thus the associated potential for development changed between different iterations of the Core Strategy? 4.2.2 We present this section in chronological order, starting with the 2007 Core Strategy Issues and Options, through the 2009 Spatial Options to the 2011 Proposed Submission Core Strategy. 2007 Core Strategy Issues and Options: 4.2.3 The 2007 Draft Settlement Strategy for the Villages (Core Strategy Issues and Options Background Paper) identifies Maresfield as a local service centre and a village with growth potential. It states (para 6.49): ‘Maresfield is a Smaller Local Service Centre and is within 5km of Uckfield (2.1miles/3.4km). It is also 2.3 miles/3.7km from the mainline station at Buxted. The village has a development boundary and is not subject to significant planning constraints. Part of the village however, is designated as a Conservation Area, which extends beyond the development boundary. There are flood zones to the east and west of the village, and the settlement is surrounded by parcels of ancient woodland’. 4.2.4 At this time, the Council identified the potential level of growth in Maresfield as being between 350 – 500 new homes. 2009 Core Strategy Spatial Options 4.2.5 In the 2009 Rural Settlement Classification (Core Strategy Spatial Options Background Paper 6), the status of Maresfield had changed to an ‘Accessible Settlement with Limited Facilities’. The Rural Settlement Classification allocated the following amount of homes to each settlement type: § Accessible Local Service Centre: 250 dwellings § Local Service Centre: 150 dwellings § Accessible Settlement with Limited Facilities: 100 dwellings § Accessible Settlement: 40 dwellings 4.2.6 Under these criteria, Maresfield would be a location for 100 new homes. The potential level of housing development increases to 250 dwellings for ‘accessible local service centres’. There are only two criteria which differentiate an ‘accessible local service centre’ from an ‘accessible settlement with limited facilities’; the former benefiting from a GP service and a business area or ‘other locally significant employment opportunities’. Maresfield meets the second of these given the recent planning permission for the Ashdown Business Park. 4.2.7 Furthermore in Barratt’s consultation response submitted to the 2009 Core Strategy Spatial Options we stated that the inclusion of the existence of a GP surgery within the criteria is considered inappropriate as it does not recognise the functional relationships between settlements whereby villages in close proximity will share facilities which none in their own right would have the scale of population to support. PPS 3 paragraph 38 makes this point. The nearest GP surgeries to Maresfield are in Buxted and Uckfield, both of which are within 5 km of Maresfield. We would also contend that the future pattern of provision of rural GP surgeries is uncertain and not a robust basis on which to allocate development to individual settlements. Given the above, we recommended that the criteria be changed to ‘access to health care facilities by sustainable modes of travel’ rather than provision of a GP service within the settlement itself. 2011 Core Strategy Submission Draft 4.2.8 Policy WSC6 establishes that provision will be made for at least 455 new dwellings across the following categories of settlement: service centre, local service centre, neighbourhood centre and unclassified settlements. Table 1 and associated Figure 2 of the Submission Core Strategy classify Maresfield as a Neighbourhood Centre. The rationale for this is set out in Appendix 3 to the Core Strategy Background Paper 1: Development of the Proposed Submission Core Strategy (February 2011). Appendix 4 establishes how each settlement was classified. 4.2.9 We contend that the settlement classification significantly underplays the role and potential of Maresfield. Criteria for classifying settlements include presence of a ‘business area’ and ‘other locally significant employment opportunities’. Maresfield receives a cross against both of these. This ignores the fact that the Ashdown Business Park, which received planning permission in 2010, is located in Maresfield. The submission Core Strategy acknowledges this at para 3.21, so why does the settlement hierarchy not take this into consideration? 4.2.10 We have compared the assessment undertaken in the Background Paper with the draft Settlement Strategy for the Villages (July 2007, Core Strategy Issues and...
Options) and the Rural Settlement Classification (July 2009, Core Strategy Spatial Development Options Background Paper). In both the 2007 and 2009 classifications, Maresfield receives a tick against both ‘business area’ and ‘other locally significant employment opportunities’. There is no reason why the assessment set out in the February 2011 background paper should change this, particularly given that the Ashdown Business Park now has planning permission. 4.2.11 The Councils Employment Land review identifies the Ashdown Business Park as the most strategically significant employment site in North Wealden. It will provide in the region of 600 – 700 jobs in a mix of office and B1 light industrial space. The planning application submitted for the Business Park makes the link between housing and employment growth and contribution to sustainable patterns of development and local employment opportunities. Para 3.18 of the submission Core Strategy states ‘The strategy is aimed at increasing the opportunity for people to work close to where they live’. 4.2.12 The criteria for assessing Maresfield also include a cross against ‘provision of changing facilities’ (for sports). Again, this is incorrect. Changing facilities exist at the recreation ground – for football and cricket – and at the Bowls Club. 4.2.13 So, the question here is why has the classification of Maresfield has changed from a local centre with growth potential (in 2007) to a Neighbourhood Centre with limited potential (in 2011), bearing in mind that the criteria have effectively remained the same and that, as we point out above, the assessment actually underplays the potential of Maresfield? The justification and rationale for changing the classification of Maresfield is not clear. 4.2.14 The Core Strategy aspires to retaining the rural character and high quality environment of the district, whilst also providing sufficient growth to improve the performance of the economy, regenerate market towns and provide a more vital future for villages. 4.2.15 However, the settlement classification is static and does not allow for any reclassification of settlements during the period covered by the LDF. It does not acknowledge that villages may become more sustainable through additional population arising from new development increasing the viability of local shops and services. PPS 3 is clear here that the need for housing provision in rural areas, not only in market towns and local service centres but also in villages in order to enhance or maintain their sustainability.

Details of Changes to be Made:
SUMMARY 4.2.16 In summary, we contend that the assessment is incorrect, previous consultation responses have not been addressed and the potential for growth and change in Maresfield is being suppressed. The assessment should be reconsidered in light of the planning permission granted for the Ashdown Business Park and the potential for balancing homes and jobs in this part of the district recognised. 4.2.17 We thus contend that, on this matter, the Core Strategy is unsound, because: 1. It is not justified, as the evidence used is incorrect; and 2. It is not effective, as the boundaries are ‘static’ and thus not flexible.
Object to the inclusion of Maresfield as a neighbourhood centre when it is clearly much more than this, and should be a Local Service Centre. Maresfield is much larger than the other villages in the neighbourhood centre group and contrary to the council’s assessment has similar or greater facilities than most of those in the Local Service Centre group. In particular it is immediately adjacent to the Ashdown Business Park which is planned to provide 1000 jobs. It also has as many if not more shops, garages, pubs than most of the LSC Group and certainly has much more than those in the NC group. In particular if Buxted is considered a LSA where there is minimal local employment, no more shops than Maresfield, no garage, and the local shop appears to have closed, is considered an LSC then clearly Maresfield should also be in this group. Maresfield should retain a development boundary. given that the council state that one of the aims of the strategy is to limit car travel and enable people to live where they work, clearly the uniqueness of Maresfield having the large employment site next to it means much more new housing should be allowed there as well. As otherwise as things stand at the moment, with the small older retired current population in Maresfield, the vast majority of workers at the Ashdown Business Park will have to drive in from other parts of the area.

Details of Changes to be Made:
Change Maresfield to where it should be a Local Service Centre. Retain a development boundary. Allocate 300 to 400 houses to Maresfield to allow workers at the Ashdown Business Park to live where they work, and not have to travel in by car from other parts of the area.

The Wealden settlement hierarchy does not adequately reflect the settlement structure in the district and, as such, it is unsound. Westham should be identified as a Service Centre due to the facilities and employment areas it contains. The hierarchy constrains positive development in lower order settlements, that may contribute to sustainable growth of the area. paragraph 3.4 should clarify that some local service centres are capable of accommodating sustainable growth.

Details of Changes to be Made:
The Wealden settlement hierarchy should be redrafted to reflect the settlement structure in the district and allow for growth to meet future economic and social needs. We consider that Westham should be allocated as a service centre due to the facilities and employment areas it contains. Paragraph 3.4 should clarify that some local service centres are capable of accommodating sustainable growth. Please see Indigo Planning letter dated 15 April 2011.

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Details of Changes to be Made:
The Wealden settlement hierarchy should be redrafted to reflect the settlement structure in the district and allow for growth to meet future economic and social needs. We consider that Westham should be allocated as a service centre due to the facilities and employment areas it contains. Paragraph 3.4 should clarify that some local service centres are capable of accommodating sustainable growth. Please see Indigo Planning letter dated 15 April 2011.
Details of Reasons for Soundness/ Legal Compliance:

1. The Core Strategy is unsound because it has defined Heathfield incorrectly within the settlement hierarchy. This is unjustified. It should be viewed as a ‘District Centre’ and not as a ‘Service Centre’. The town fulfils the functions and characteristics of a District Centre as defined on Table 1. It is a far more important settlement within the district than the Council has suggested, evidenced in the Core Strategy paragraph 2.3 which identifies Heathfield as one of the five main towns in the district and in Policy SP04 which refers to “our five principal towns”. The character of the town is very different to the other Service Centres identified. It is a largely self-contained settlement, with a wide range of services and facilities that serves a distinct part of the district. Due to the size of additional appendices they have not been uploaded but are available to view at the Council's offices.

Details of Changes to be Made:
2. Paragraph 3.4 states that, “the large majority of future planned growth in Wealden needs to be focused on the towns and larger villages in the hierarchy, where facilities services and site opportunities exist. It is considered that the Council has under-estimated the current and future roles that Heathfield can play in this respect by failing to properly recognise the character and function of the town.

Details of Reasons for Soundness/ Legal Compliance:

The Core Strategy is unsound because it has defined Heathfield incorrectly within the settlement hierarchy. This is unjustified. It should be viewed as a ‘District Centre’ and not as a ‘Service Centre’. The town fulfils the functions and characteristics of a District Centre as defined on table 1. It is a far more important settlement within the district than the Council has suggested. Indeed the Council itself identifies Heathfield as one of the five main towns in the District in paragraph 2.3 of the Proposed Core Strategy and Policy SP04 which refers to “our five principle towns”. The character of the town is very different to the other Service Centres identified. It is a largely self-contained settlement, with a wide range of services and facilities, that serves a distinct part of the district. 2 Paragraph 3.4 states that, “the large majority of future planned growth in Wealden needs to be focused on the towns and larger villages in the hierarchy, where facilities services and site opportunities exist. It is considered that the Council has under-estimated the current and future roles that Heathfield can play in this respect by failing to properly recognise the character and function of the town. 3 In order to make the Core Strategy sound, Heathfield should be redefined within the Settlement hierarchy as a District Centre.

Details of Changes to be Made:
Heathfield should be re-defined in the Settlement Hierarchy as a District Centre.
Paragraph 3.3

Details of Reasons for Soundness/ Legal Compliance:
Policies to restrain traffic, obtain modal shift in travel, reducing need to travel and improve the experience of non-car travel need to be sharpened and focused. Aspirations for these to happen must have necessary circumstances incorporated into the policies.

Details of Changes to be Made:
Demand management techniques for traffic in Hailsham (6.15) should be included in all the related and equivalent policies. There should be a definite commitment to traffic reduction measures and targets throughout the Strategy Plan document.

Details of Reasons for Soundness/ Legal Compliance:
This seems to be an attempt to unload responsibility for a section of Wealdens population on to a town outside its area. TW already carries a considerable burden with regard to population services and jobs. Extra strain would not be fair on the existing residents, especially in the present economic conditions, and shoukd be bourne by Wealden urban centres.

Details of Changes to be Made:
4.2 Issues

4.2.1 In the Core Strategy, the settlement hierarchy is a key determinant in distributing housing growth across settlements. It has been used at all stages in the plan process. However, the terminology to describe settlements at different levels of the hierarchy has changed and the criteria have been incorrectly applied. The results of this are that Maresfield has been classified incorrectly and the potential to accommodate growth has thus been underplayed. The issues here are thus: § The assessment of Maresfield against the criteria used to classify villages in the hierarchy has changed over time § The assessment has been inappropriately applied. It does not, in Maresfield, acknowledge the employment offer that will be forthcoming at the Ashdown Business Park, even though this has planning permissions § The assessment is static and does not allow for change or reclassification over time § Why has the classification and thus the associated potential for development changed between different iterations of the Core Strategy? 4.2.2 We present this section in chronological order, starting with the 2007 Core Strategy Issues and Options, through the 2009 Spatial Options to the 2011 Proposed Submission Core Strategy. 2007 Core Strategy Issues and Options: 4.2.3 The 2007 Draft Settlement Strategy for the Villages (Core Strategy Issues and Options Background Paper) identifies Maresfield as a local service centre and a village with growth potential. It states (para 6.49): ‘Maresfield is identified as a ‘business area’ and ‘other locally significant employment opportunities’. 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The potential level of housing development increases to 250 dwellings for ‘accessible local service centres’. There are only two criteria which differentiate an ‘accessible local service centre’ from an ‘accessible settlement with limited facilities’; the former benefiting from a GP service and a business area or ‘other locally significant employment opportunities’. Maresfield meets the second of these given the recent planning permission for the Ashdown Business Park. 4.2.7 Furthermore in Barratt’s consultation response submitted to the 2009 Core Strategy Spatial Options we stated that the inclusion of the existence of a GP surgery within the criteria is considered inappropriate as it does not recognise the functional relationships between settlements whereby villages in close proximity will share facilities which none in their own right would have the scale of population to support. PPS 3 paragraph 38 makes this point. The nearest GP surgeries to Maresfield are in Buxted and Uckfield, both of which are within 5 km of Maresfield. We would also contend that the future pattern of provision of rural GP surgeries is uncertain and not a robust basis on which to allocate development to individual settlements. Given the above, we recommend that the criteria be changed to ‘access to health care facilities by sustainable modes of travel’ rather than provision of a GP service within the settlement itself. 2011 Core Strategy Submission Draft 4.2.8 Policy WSC6 establishes that provision will be made for at least 455 new dwellings across the following categories of settlement: service centre, local service centre, neighbourhood centre and unclassified settlements. Table 1 and associated Figure 2 of the Submission Core Strategy classify Maresfield as a Neighbourhood Centre. The rationale for this is set out in Appendix 3 to the Core Strategy Background Paper 1: Development of the Proposed Submission Core Strategy (February 2011). Appendix 4 establishes how each settlement was classified. 4.2.9 We contend that the settlement classification significantly underplays the role and potential of Maresfield. Criteria for classifying settlements include presence of a ‘business area’ and ‘other locally significant employment opportunities’. Maresfield receives a cross against both of these. This ignores the fact that the Ashdown Business Park, which received planning permission in 2010, is located in Maresfield. The submission Core Strategy acknowledges this at para 3.21, so why does the settlement hierarchy not take this into consideration? 4.2.10 We have compared the assessment undertaken in the Background Paper with the draft Settlement Strategy for the Villages (July 2007, Core Strategy Issues and
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Details of Changes to be Made:

SUMMARY 4.2.16 In summary, we contend that the assessment is incorrect, previous consultation responses have not been addressed and the potential for growth and change in Maresfield is being suppressed. The assessment should be reconsidered in light of the planning permission granted for the Ashdown Business Park and the potential for balancing homes and jobs in this part of the district recognised. 4.2.17 We thus contend that, on this matter, the Core Strategy is unsound, because: 1. It is not justified, as the evidence used is incorrect; and 2. It is not effective, as the boundaries are ‘static’ and thus not flexible.

Representation ID
1588

Person ID Ognjanovic
522137 Polegate Town Council

Paragraph 3.3

Sound ☐ Yes ☑ No ☐ Justified ☐ Effective ☐ Consistent with national policy

Legally Compliant ☐ Yes ☐ No

Details of Reasons for Soundess/ Legal Complaince:
Concern raised at the reference to Polegate and Willingdon as one settlement

Details of Changes to be Made:
Details of Reasons for Soundess/ Legal Complaince:
Object to the inclusion of Maresfield as a neighbourhood centre when it is clearly much more than this, and should be a Local Service Centre. Maresfield is much larger than the other villages in the neighbourhood centre group and contrary to the council's assessment has similar or greater facilities than most of those in the Local Service Centre group. In particular it is immediately adjacent to the Ashdown Business Park which is planned to provide 1000 jobs. It also has as many if not more shops, garages, pubs than most of the LSC Group and certainly has much more than those in the NC group. In particular if Buxted is considered a LSA where there is minimal local employment, no more shops than Maresfield, no garage, and the local shop appears to have closed, is considered an LSC then clearly Maresfield should also be in this group. Maresfield should retain a development boundary. given that the council state that one of the aims of the strategy is to limit car travel and enable people to live where they work, clearly the uniqueness of Maresfield having the large employment site next to it means much more new housing should be allowed there as well. As otherwise as things stand at the moment, with the small older retired current population in Maresfield, the vast majority of workers at the Ashdown Business Park will have to drive in from other parts of the area.

Details of Changes to be Made:
Change Maresfield to where it should be a Local Service Centre. Retain a development boundary. Allocate 300 to 400 houses to Maresfield to allow workers at the Ashdown Business Park to live where they work, and not have to travel in by car from other parts of the area.

Details of Reasons for Soundess/ Legal Complaince:
Heathfield is identified as one of the five main towns in the District. Wealden clearly acknowledges the town's sustainability in its Settlement Hierarchy as its assessment ranks Heathfield as a 'Service Centre' alongside Polegate and Willingdon, Stone Cross, Wadhurst and Forest Row. It concludes that the town has a range of jobs, services and facilities that serves not only its nearby communities but also the wider hinterland. Paragraph 3.4 states that the spatial strategy seeks to reinforce the Settlement Hierarchy. Yet the proportion of numbers allocated to Heathfield does not reflect the level of facilities and services available in the settlement and therefore its ability to accommodate greater growth.

Details of Changes to be Made:
It is necessary to re-assess the potential for Heathfield to accommodate growth.
AGain support is given to the strategy of reinforce the existing settlement pattern and focussing growth where it is most accessible and sustainable Strong support is also given to the strategy in terms of the large majority of future planned growth in Wealden needs to be focused on the towns and larger villages in the hierarchy, where facilities, services and site opportunities exist.

**Details of Changes to be Made:**

The Wealden settlement hierarchy should be redrafted to reflect the settlement structure in the district and allow for growth to meet future economic and social needs. We consider that Westham should be allocated as a service centre due to the facilities and employment areas it contains. Paragraph 3.4 should clarify that some local service centres are capable of accommodating sustainable growth. Please see Indigo Planning letter dated 15 April 2011
The Core Strategy is unsound because it has defined Heathfield incorrectly within the settlement hierarchy. This is unjustified. It should be viewed as a ‘District Centre’ and not as a ‘Service Centre’. The town fulfils the functions and characteristics of a District Centre as defined on table 1. It is a far more important settlement within the district than the Council has suggested. Indeed, the Council itself identifies Heathfield as one of the five main towns in the District in paragraph 2.3 of the Proposed Core Strategy and Policy SP04 which refers to “our five principle towns”. The character of the town is very different to the other Service Centres identified. It is a largely self-contained settlement, with a wide range of services and facilities, that serves a distinct part of the district. Due to the size of additional appendices they have not been uploaded but are available to view at the Council’s offices.

Details of Changes to be Made:
Healthfield should be re-defined in the Settlement Hierarchy as a District Centre.
Representation ID 410

Person ID  Elisa Serpell
Agent ID
521964

Paragraph 3.4

Sound ☐ Yes ☑ No ☑ Justified ☐ Effective ☐ Consistent with national policy
Legally Compliant ☐ Yes ☐ No

Details of Reasons for Soundness/ Legal Complaince:
East Hoathly is clearly wrongly classified and should be included as a local service centre capable of taking more growth

Details of Changes to be Made:
To include East Hoathly as a local service centre

Representation ID 1630

Person ID  Pelham Homes
Agent ID  Mrs Owen
107745  102625 Jennifer Owen & Associates Ltd.

Paragraph 3.4

Sound ☐ Yes ☑ No ☐ Justified ☐ Effective ☐ Consistent with national policy
Legally Compliant ☐ Yes ☐ No

Details of Reasons for Soundness/ Legal Complaince:
"Supplementary documents have been submitted but not attached, and may be viewed at the Council offices on request". Paragraph 3.4. There is no explanation as to why the existing settlement hierarchy is to be reinforced rather than changed. there is a conflict between reinforcing the pattern in the second sentence and promoting more sustainable patterns of development in the third sentence.

Details of Changes to be Made:
REVISION SOUGHT. "Our spatial strategy is to broadly follow this pattern whilst clearly acknowledging that future development in some of these settlements is more sustainable than in others."
4.1 Introduction 4.1.1 This section of our representations refers to the settlement hierarchy set out in the proposed submission Core Strategy. Our representation is summarised below: Section of Core Strategy: Table 1, Settlement Hierarchy Figure 2, Settlement Hierarchy, and Paras 3.2 – 3.7Legally Compliant: -Sound: NoJustified: NoEffective: NoConsistent with national policy: - 4.2 Issues 4.2.1 In the Core Strategy, the Settlement hierarchy is a key determinant in distributing housing growth across settlements. It has been used at all stages in the plan process. However, the terminology to describe settlements at different levels of the hierarchy has changed and the criteria have been incorrectly applied. The results of this are that Maresfield has been classified incorrectly and the potential to accommodate growth here has thus been underplayed. The issues here are thus: § The assessment of Maresfield against the criteria used to classify villages in the hierarchy has changed over time § The assessment has been inappropriately applied. It does not, in Maresfield, acknowledge the employment offer that will be forthcoming at the Ashdown Business Park, even though this has planning permissions § The assessment is static and does not allow for change or reclassification over time § Why has the classification and thus the associated potential for development changed between different iterations of the Core Strategy? 4.2.2 We present this section in chronological order, starting with the 2007 Core Strategy Issues and Options, through the 2009 Spatial Options to the 2011 Proposed Submission Core Strategy. 2007 Core Strategy Issues and Options: 4.2.3 The 2007 Draft Settlement Strategy for the Villages (Core Strategy Issues and Options Background Paper) identifies Maresfield as a local service centre and a village with growth potential. It states (para 6.49): ‘Maresfield is a ‘business area’ and ‘other locally significant employment opportunities’. Maresfield receives a cross against both development increases to 250 dwellings for ‘accessible local service centres’. There are only two criteria which differentiate an ‘accessible local service centre’ from an ‘accessible settlement with limited facilities’; the former benefiting from a GP service and a business area or ‘other locally significant employment opportunities’. Maresfield meets the second of these given the recent planning permission for the Ashdown Business Park. 4.2.7 Furthermore in Barratt’s consultation response submitted to the 2009 Core Strategy Spatial Options we stated that the inclusion of the existence of a GP surgery within the criteria is considered inappropriate as it does not recognise the functional relationships between settlements whereby villages in close proximity will share facilities which none in their own right would have the scale of population to support. PPS 3 paragraph 38 makes this point. The nearest GP surgeries to Maresfield are in Buxted and Uckfield, both of which are within 5 km of Maresfield. We would also contend that the future pattern of provision of rural GP surgeries is uncertain and not a robust basis on which to allocate development to individual settlements. Given the above, we recommended that the criteria be changed to ‘access to health care facilities by sustainable modes of travel’ rather than provision of a GP service within the settlement itself. 2011 Core Strategy Submission Draft 4.2.8 Policy WSC6 establishes that provision will be made for at least 455 new dwellings across the following categories of settlement: service centre, local service centre, neighbourhood centre and unclassified settlements. Table 1 and associated Figure 2 of the Submission Core Strategy classify Maresfield as a Neighbourhood Centre. The rationale for this is set out in Appendix 3 to the Core Strategy Background Paper 1: Development of the Proposed Submission Core Strategy (February 2011). Appendix 4 establishes how each settlement was classified. 4.2.9 We contend that the settlement classification significantly underplays the role and potential of Maresfield. Criteria for classifying settlements include presence of a ‘business area’ and ‘other locally significant employment opportunities’. Maresfield receives a cross against both of these. This ignores the fact that the Ashdown Business Park, which received planning permission in 2010, is located in Maresfield. The submission Core Strategy acknowledges this at para 3.21, so why does the settlement hierarchy not take this into consideration? 4.2.10 We have compared the assessment undertaken in the Background Paper with the draft Settlement Strategy for the Villages (July 2007, Core Strategy Issues and
Options) and the Rural Settlement Classification (July 2009, Core Strategy Spatial Development Options Background Paper). In both the 2007 and 2009 classifications, Maresfield receives a tick against both ‘business area’ and ‘other locally significant employment opportunities’. There is no reason why the assessment set out in the February 2011 background paper should change this, particularly given that the Ashdown Business Park now has planning permission.

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Details of Changes to be Made:
SUMMARY 4.2.16 In summary, we contend that the assessment is incorrect, previous consultation responses have not been addressed and the potential for growth and change in Maresfield is being suppressed. The assessment should be reconsidered in light of the planning permission granted for the Ashdown Business Park and the potential for balancing homes and jobs in this part of the district recognised. 4.2.17 We thus contend that, on this matter, the Core Strategy is unsound, because: 1. It is not justified, as the evidence used is incorrect; and 2. It is not effective, as the boundaries are ‘static’ and thus not flexible.

Representation ID
822
Person ID  Mr & Flittner
Agent ID  106034
Paragraph  3.5
Sound ☑ Yes ☐ No ☑ Justified ☑ Effective ☑ Consistent with national policy
Legally Compliant ☐ Yes ☐ No
Details of Reasons for Soundess/ Legal Complaince:
Object to the inclusion of Maresfield as a neighbourhood centre when it is clearly much more than this, and should be a Local Service Centre. Maresfield is much larger than the other villages in the neighbourhood centre group and contrary to the council's assessment has similar or greater facilities than most of those in the Local Service Centre group. In particular it is immediately adjacent to the Ashdown Business Park which is planned to provide 1000 jobs. It also has as many if not more shops, garages, pubs than most of the LSC Group and certainly has much more than those in the NC group. In particular if Buxted is considered a LSA where there is minimal local employment, no more shops than Maresfield, no garage, and the local shop appears to have closed, is considered an LSC then clearly Maresfield should also be in this group. Maresfield should retain a development boundary, given that the council state that one of the aims of the strategy is to limit car travel and enable people to live where they work, clearly the uniqueness of Maresfield having the large employment site next to it means much more new housing should be allowed there as well. As otherwise as things stand at the moment, with the small older retired current population in Maresfield, the vast majority of workers at the Ashdown Business Park will have to travel in from other parts of the area.

Details of Changes to be Made:
Change Maresfield to where it should be a Local Service Centre. Retain a development boundary. Allocate 300 to 400 houses to Maresfield to allow workers at the Ashdown Business Park to live where they work, and not have to travel in by car from other parts of the area.
Details of Reasons for Soundness/Legal Compliance:
The Wealden settlement hierarchy does not adequately reflect the settlement structure in the district and, as such, it is unsound. Westham should be identified as a Service Centre due to the facilities and employment areas it contains. The hierarchy constrains positive development in lower order settlements, that may contribute to sustainable growth of the area. Paragraph 3.4 should clarify that some local service centres are capable of accommodating sustainable growth.

Details of Changes to be Made:
The Wealden settlement hierarchy should be redrafted to reflect the settlement structure in the district and allow for growth to meet future economic and social needs. We consider that Westham should be allocated as a service centre due to the facilities and employment areas it contains. Paragraph 3.4 should clarify that some local service centres are capable of accommodating sustainable growth. Please see Indigo Planning letter dated 15 April 2011.
Details of Reasons for Soundness/ Legal Complaince:
The Core Strategy is unsound because it has defined Heathfield incorrectly within the settlement hierarchy. This is unjustified. It should be viewed as a ‘District Centre’ and not as a ‘Service Centre’. The town fulfils the functions and characteristics of a District Centre as defined on table 1. It is a far more important settlement within the district than the Council has suggested. Indeed the Council itself identifies Heathfield as one of the five main towns in the District in paragraph 2.3 of the Proposed Core Strategy and Policy SP04 which refers to “our five principle towns”. The character of the town is very different to the other Service Centres identified. It is a largely self-contained settlement, with a wide range of services and facilities, that serves a distinct part of the district. 2 Paragraph 3.4 states that, “the large majority of future planned growth in Wealden needs to be focused on the towns and larger villages in the hierarchy, where facilities services and site opportunities exist. It is considered that the Council has under-estimated the current and future roles that Heathfield can play in this respect by failing to properly recognise the character and function of the town. 3 In order to make the Core Strategy sound, Heathfield should be redefined within the Settlement hierarchy as a District Centre.

Details of Changes to be Made:
Heathfield should be re-defined in the Settlement Hierarchy as a District Centre
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It states (para 6.49): ‘Maresfield is an ‘accessible local service centre’ from an ‘accessible settlement with limited facilities’; the former benefiting from a GP service and a business area or ‘other locally significant employment opportunities’. Maresfield meets the second of these given the recent planning permission for the Ashdown Business Park. 4.2.4 At this time, the Council identified the potential level of growth in Maresfield as being between 350 – 500 new homes. 2009 Core Strategy Spatial Options 4.2.5 In the 2009 Rural Settlement Classification (Core Strategy Spatial Options Background Paper 6), the status of Maresfield had changed to an ‘Accessible Settlement with Limited Facilities’. The Rural Settlement Classification allocated the following amount of homes to each settlement type: § Accessible Local Service Centre: 250 dwellings § Local Service Centre: 150 dwellings § Accessible Settlement with Limited Facilities: 100 dwellings § Accessible Settlement: 40 dwellings 4.2.6 Under these criteria, Maresfield would be a location for 100 new homes. The potential level of housing development increases to 250 dwellings for ‘accessible local service centres’. There are only two criteria which differentiate an ‘accessible local service centre’ from an ‘accessible settlement with limited facilities’; the former benefiting from a GP service and a business area or ‘other locally significant employment opportunities’. 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Details of Changes to be Made:
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Representation ID
823

Person ID Mr & Flittner
106034

Agent ID

Paragraph 3.6

Sound ☐ Yes ☑ No ☑ Justified ☑ Effective ☑ Consistent with national policy

Legally Compliant ☐ Yes ☑ No

Details of Reasons for Soundess/ Legal Complainse:
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Details of Changes to be Made:
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Details of Reasons for Soundness/ Legal Complaince:

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Details of Changes to be Made:

2. Paragraph 3.4 states that, "the large majority of future planned growth in Wealden needs to be focused on the towns and larger villages in the hierarchy, where facilities services and site opportunities exist. It is considered that the Council has under-estimated the current and future roles that Heathfield can play in this respect by failing to properly recognise the character and function of the town.

Representation ID

358

Person ID Mr Burrough Agent ID Mr Ide
521930 Batcheller Monkhouse 335759 Batcheller Monkhouse
Paragraph 3.6
Sound ☐ Yes ☑ No ☑ Justified ☑ Effective ☐ Consistent with national policy
Legally Compliant ☑ Yes ☐ No

Details of Reasons for Soundness/ Legal Complaince:

It is important to understand the relationship between the Council’s settlement hierarchy, proposed Rural Growth Areas (Figure 11) and proposed amendments to settlement boundaries (WCS6). If the relationship is unclear, the Core Strategy is unclear. The SHLAA is predominantly 'site centred'; Rural Growth Areas need to consider the impact individual sites, most often identified in the SHLAA, will have upon a village / rural settlement. Designation of a village / rural settlement as a Growth Area indicates that there will be development for new housing with infrastructure to support it over a substantial time frame (up to 2030). The Core Strategy proposes to continue to apply countryside constraints to neighbourhood centres. To achieve this, some Growth Areas identified in Figure 11 in the Plan will have their development boundaries removed; other Growth Areas will not have development boundaries defined. There is a risk these policies could work against each other. In combination, these policies send out a mixed message to residents in the villages concerned – on the one hand, it is indicated that rural character will be preserved and yet on the other, with Growth Area designation, that there will be change with some degree of urbanisation. Proposed Change

Details of Changes to be Made:

That Growth Areas indentified in Figure 11 have development boundaries retained and Growth Areas presently without development boundaries have boundaries defined in later DPDs, with consequential amendments made to Paras 3.6 and 3.7.
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We would also contend that the future pattern of provision of rural GP surgeries is uncertain and not a robust basis on which to allocate development to individual settlements. Given the above, we recommended that the criteria be changed to ‘access to health care facilities by sustainable modes of travel’ rather than provision of a GP service within the settlement itself. 2011 Core Strategy Submission Draft 4.2.8 Policy WSC6 establishes that provision will be made for at least 455 new dwellings across the following categories of settlement: service centre, local service centre, neighbourhood centre and unclassified settlements. Table 1 and associated Figure 2 of the Submission Core Strategy classify Maresfield as a Neighbourhood Centre. The rationale for this is set out in Appendix 3 to the Core Strategy Background Paper 1: Development of the Proposed Submission Core Strategy (February 2011). 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Details of Changes to be Made:

SUMMARY 4.2.16 In summary, we contend that the assessment is incorrect, previous consultation responses have not been addressed and the potential for growth and change in Maresfield is being suppressed. The assessment should be reconsidered in light of the planning permission granted for the Ashdown Business Park and the potential for balancing homes and jobs in this part of the district recognised. 4.2.17 We thus contend that, on this matter, the Core Strategy is unsound, because: 1. It is not justified, as the evidence used is incorrect; and 2. It is not effective, as the boundaries are ‘static’ and thus not flexible.
5 Removal of Settlement Boundaries 5.1 Introduction

5.1.1 This section of our representations refers to the removal of settlement boundaries as set out in policy WCS6 and supporting paragraphs 3.6 and 3.7. Our representation is summarised below: Section of Core Strategy: Policy WCS6 Rural Areas Strategy, paras 3.6 & 3.7 Legally Compliant: -Sound: No-Justified: No-Effective: No-Consistent with national policy: No

5.2 Issues

5.2.1 The draft Submission Core Strategy addresses, at para 3.6, the rationale for development boundaries. At para 3.7, it is stated that in neighbourhood centres and other unclassified settlements, countryside constraints will be applied. Policy WCS6 then lists thirteen villages where development boundaries will be removed. 5.2.2 Issues here for consideration are: § The option for removing boundaries was not asked in either the 2007 or 2009 consultation and no responses were made to suggest that they should be removed § Initial officer comments, based on consultation responses to the 2007 consultation, suggest that boundaries should be retained as a positive planning tool. § Why has the concept of removing development boundaries been introduced? § Where is the evidence for introducing this concept?

5.2.3 The removal of development boundaries was discussed at the WDC Committee meetings towards the end of 2010. The minutes of the meetings expressly state that consultation had taken place on this issue in both 2007 and 2009 (see, for example, minutes of meeting dated 19 October 2010). 5.2.4 Despite this, the minutes of the 10 November 2010 Committee record ‘Members expressed concerns regarding the proposal to remove a number of development boundaries from some settlements’. The minutes of the 19 October 2010 Committee record ‘The Chairman… felt that the parishes had been consulted and that ward councillors also have a responsibility to liaise with their parishes and feedback through the process’. 5.2.5 At the Maresfield Parish Council meeting of 16 November 2010 the removal of the development boundaries was raised. The minutes record that Cllr Galley stated: ‘Parishes had been asked for their views on development boundaries in 2007, and some 300 responses had been received which were equally divided for and against keeping the boundaries. Possibly not all respondents had comprehended the question. Many parishes could not recall being asked.’ 5.2.6 So, were the Parishes asked? The 2007 Core Strategy Issues and Options did not expressly ask a question about removing the boundaries. Rather, the questions posed were: Do you agree with the following options: 5a: Settlement boundaries should be maintained, but should be expanded where needed to allow for necessary growth 5b: There should be a policy which allows for some small scale development to take place outside settlement boundaries subject to strict criteria 5c: If you have any further brief comments (including any changes to boundaries you would like to make) please tell us 5.2.7 None of the options ask whether the boundaries should be removed. 5.2.8 The responses to these questions are summarised in page 54 of Agenda Item 8, Appendix C, Technical Summary of Issues Raised through the Issues and Options Consultation Process, Cabinet Local Development Framework Sub Committee Date: 15th October 2007. All comments can also be viewed via the Councils LDF consultation portal. There is no suggestion from any of the responses that the boundaries should be removed. Indeed, responses highlight the importance of maintaining the boundaries, and, in some instances, extended these. 5.2.9 In relation to question 5c, the agenda paper reports that a number of settlements were suggested where the boundary could be changed. These include Maresfield (see page 58). This is closely related to responses to option 21a asking whether people agreed or disagreed with the possible level of growth potential for Maresfield, which at this point was between 350 – 500 homes. Page 163 summarises responses in regard to the option. Support was made for growth in Maresfield and for a change to the boundary to the south of the village to accommodate this growth. No reference is made here to the removal of the development boundary. 5.2.10 The statement made by Cllr Galley at the Maresfield Parish Council (16 November 2010 – see above) meeting raises another issue. Did the options being consulted upon actually reflect the question the Council was trying to ask, i.e.: should development boundaries be removed from some settlements? If this is the case, and consultees have submitted responses unaware of this, then the consultation undertaken must be flawed. Question 5a is perhaps the closest to asking the question about removal, but it is clearly couched in the context of growth and development, i.e.: should they be maintained, reflecting the status quo, or expanded to allow for growth. The question does not ask whether the boundaries should be removed. 5.2.11 Either way, it is clear from the officer recommendation based on the responses to the 2007 consultation (see page 60) that settlement boundaries are a positive planning tool and should be retained. There is no mention of removal: ‘It would appear that, from the comments received, settlement boundaries are a positive planning policy tool and as an initial recommendation that they should be retained. It is preferable, taking into account the comments raised, that any review of development boundaries should be comprehensive in nature with transparent criteria and consultation. In addition to the use of settlement boundaries, there appears to be some agreement to allowing development in the
countryside to meet local need and this will also need to be considered’. 5.2.12 This recommendation also refers to the use of transparent criteria and consultation when reviewing development boundaries. We can not see (a) any evidence of what transparent criteria have been employed to suggest that the development boundaries should be removed, nor (b) what consultation was undertaken that expressly asked whether the boundaries should be removed. 5.2.13 Para 4.40 of the paper prepared under Agenda Item 8 of the LDF sub Committee on 15th October 2007 states: (i) There is a need for a comprehensive review of boundaries to reflect the current situation on the ground, with appropriate community involvement; (ii) A balance needs to be found between preventing urban sprawl, preventing town cramming and not stifling the development needs of individual communities, particularly where no specific allocations are envisaged. The High Weald AONB Unit was amongst those considering boundaries to have been applied too rigidly and that they have not necessarily taken into account the historic pattern of village development. (iii) That any redefinition of settlement boundaries should have regard to the need to retain the distinct and separate identity of nearby settlements; (iv) Not to limit appropriate design and force high densities in locations where new development is proposed; (v) There could be a need for settlement boundaries to be drawn for villages not identified for growth in any event; (vi) There could be a need to redraw more tightly the boundaries for certain villages, a view shared (cautiously) by the South Downs Joint Committee. (vii) The need for well-defined and systematic criteria for defining settlement boundaries and for the selection of settlements where settlement boundaries should be applied. 5.2.14 This response: (a) acknowledges support for the retention of settlement boundaries; (b) that, even in those settlements where there would be no growth, settlement boundaries are required; and (c) there is a need for a well-defined and systematic criteria for defining settlement boundaries and where they should be applied. It is quite clear that there is no intention to remove development boundaries and, in fact, the consultation strengthened the rationale for retention and, where appropriate, modification and expansion. 5.2.15 The 2009 Spatial Options consultation presents options in regard to the quantum and distribution of growth across the District, but does not present options about settlement boundaries nor ask whether they should be removed. 5.2.16 Although responses were made to the 2009 consultation in terms of the level of growth that might be appropriate and which spatial growth option should be progressed, there is no specific response which states that the Maresfield development boundary should be removed.

Details of Changes to be Made:
SUMMARY 5.2.17 In conclusion, we contend that the Core Strategy is unsound because: 1. it is not justified because (i) it is not based on evidence as no question was asked and (ii) it has not been considered against alternatives; 2. it is not effective, because it is not flexible; and 3. it is not consistent with national policy, specifically that set out in the Local Growth White Paper . 5.2.18 Representations made in previous sections indicate that the level of housing growth set out in the submission Core Strategy is too low, that the housing distribution and trajectory should be reconsidered, and that Maresfield is a suitable and sustainable location to accommodate additional housing growth. We thus suggest that Maresfield should (a) have a settlement boundary, and (b) that this should be drawn to allow for additional housing growth.

Representation ID

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<td>Mr Carter Lewis &amp; Co Planning</td>
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<td>Details of Reasons for Soundess/ Legal Complaince:</td>
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We believe that to remove all small settlements (neighbourhood centres and smaller) from the development boundaries, and to make them subject to countryside policies only, is too general an assumption to make at Core Strategy level. The decision as to whether a settlement should have a development boundary or not should be when the Proposals Map DPD is considered - such consideration should not be prejudiced by generalisations contained within the Core Strategy. The Core Strategy should only be for large strategic allocations, not the smaller allocations that may be found in smaller centres.

Details of Changes to be Made:
The Core Strategy should restrict itself to categorisation of settlements only. Development boundaries should be considered at the Site Allocations DPD stage. The Core Strategy should only be for large strategic allocations, not the smaller allocations that may be found in smaller centres.
### Representation ID 504

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**Details of Reasons for Soundness/ Legal Complaint:**

Object to the inclusion of Maresfield as a neighbourhood centre when it is clearly much more than this, and should be a Local Service Centre. Maresfield is much larger than the other villages in the neighbourhood centre group and contrary to the council's assessment has similar or greater facilities than most of those in the Local Service Centre group. In particular it is immediately adjacent to the Ashdown Business Park which is planned to provide 1000 jobs. It also has as many if not more shops, garages, pubs than most of the LSC Group and certainly has much more than those in the NC group. In particular if Buxted is considered a LSA where there is minimal local employment, no more shops than Maresfield, no garage, and the local shop appears to have closed, is considered an LSC then clearly Maresfield should also be in this group. Maresfield should retain a development boundary. given that the council state that one of the aims of the strategy is to limit car travel and enable people to live where they work, clearly the uniqueness of Maresfield having the large employment site next to it means much more new housing should be allowed there as well. As otherwise as things stand at the moment, with the small older retired current population in Maresfield, the vast majority of workers at the Ashdown Business Park will have to drive in from other parts of the area.

**Details of Changes to be Made:**

Change Maresfield to where it should be a Local Service Centre. Retain a development boundary. Allocate 300 to 400 houses to Maresfield to allow workers at the Ashdown Business Park to live where they work, and not have to travel in by car from other parts of the area.

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### Representation ID 824

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**Details of Reasons for Soundness/ Legal Complaint:**

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**Details of Changes to be Made:**

Change Maresfield to where it should be a Local Service Centre. Retain a development boundary. Allocate 300 to 400 houses to Maresfield to allow workers at the Ashdown Business Park to live where they work, and not have to travel in by car from other parts of the area.
Paragraph 3.7

Details of Reasons for Soundness/ Legal Compliance:

The Wealden settlement hierarchy does not adequately reflect the settlement structure in the district and, as such, it is unsound. Westham should be identified as a Service Centre due to the facilities and employment areas it contains. The hierarchy constrains positive development in lower order settlements, that may contribute to sustainable growth of the area. Paragraph 3.4 should clarify that some local service centres are capable of accommodating sustainable growth.

Details of Changes to be Made:

The Wealden settlement hierarchy should be redrafted to reflect the settlement structure in the district and allow for growth to meet future economic and social needs. We consider that Westham should be allocated as a service centre due to the facilities and employment areas it contains. Paragraph 3.4 should clarify that some local service centres are capable of accommodating sustainable growth. Please see Indigo Planning letter dated 15 April 2011.

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Paragraph 3.7

Details of Reasons for Soundness/ Legal Compliance:

1. The Core Strategy is unsound because it has defined Heathfield incorrectly within the settlement hierarchy. This is unjustified. It should be viewed as a 'District Centre' and not as a 'Service Centre'. The town fulfils the functions and characteristics of a District Centre as defined on Table 1. It is a far more important settlement within the district than the Council has suggested, evidenced in the Core Strategy paragraph 2.3 which identifies Heathfield as one of the five main towns in the district and in Policy SP04 which refers to "our five principal towns". The character of the town is very different to the other Service Centres identified. It is a largely self-contained settlement, with a wide range of services and facilities that serves a distinct part of the district. Due to the size of additional appendices they have not been uploaded but are available to view at the Council's offices.

Details of Changes to be Made:

2. Paragraph 3.4 states that, "the large majority of future planned growth in Wealden needs to be focused on the towns and larger villages in the hierarchy, where facilities services and site opportunities exist. It is considered that the Council has under-estimated the current and future roles that Heathfield can play in this respect by failing to properly recognise the character and function of the town."
Summary of all Representations - Proposed Submission Core Strategy Regulation 27 - Report 11th July 2011

Representation ID
1491
Person ID  Mr Nightingale
332748
Agent ID  Mr Nightingale
102571

Paragraph  3.7
Sound  ☐ Yes  ☑ No  ☑ Justified  ☐ Effective  ☐ Consistent with national policy
Legally Compliant  ☐ Yes  ☐ No

Details of Reasons for Soundess/ Legal Complaince:
The Core Strategy is unsound because it has defined Heathfield incorrectly within the settlement hierarchy. This is unjustified. It should be viewed as a 'District Centre' and not as a 'Service Centre'. The town fulfils the functions and characteristics of a District Centre as defined on table 1. It is a far more important settlement within the district than the Council has suggested. Indeed the Council itself identifies Heathfield as one of the five main towns in the District in paragraph 2.3 of the Proposed Core Strategy and Policy SP04 which refers to "our five principle towns". The character of the town is very different to the other Service Centres identified. It is a largely self-contained settlement, with a wide range of services and facilities, that serves a distinct part of the district. 2 Paragraph 3.4 states that, "the large majority of future planned growth in Wealden needs to be focused on the towns and larger villages in the hierarchy, where facilities services and site opportunities exist. It is considered that the Council has under-estimated the current and future roles that Heathfield can play in this respect by failing to properly recognise the character and function of the town. 3 In order to make the Core Strategy sound, Heathfield should be redefined within the Settlement hierarchy as a District Centre.

Details of Changes to be Made:
Heathfield should be re-defined in the Settlement Hierarchy as a District Centre

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Representation ID
360
Person ID  Mr Burrough
521930
Agent ID  Mr Ide
335759

Paragraph  3.7
Sound  ☐ Yes  ☑ No  ☑ Justified  ☑ Effective  ☐ Consistent with national policy
Legally Compliant  ☑ Yes  ☐ No

Details of Reasons for Soundess/ Legal Complaince:
It is important to understand the relationship between the Council’s settlement hierarchy, proposed Rural Growth Areas (Figure 11) and proposed amendments to settlement boundaries (WCS6). If the relationship is unclear, the Core Strategy is unclear. The SHLAA is predominantly 'site centred'; Rural Growth Areas need to consider the impact individual sites, most often identified in the SHLAA, will have upon a village / rural settlement. Designation of a village / rural settlement as a Growth Area indicates that there will be development for new housing with infrastructure to support it over a substantial time frame (up to 2030). The Core Strategy proposes to continue to apply countryside constraints to neighbourhood centres. To achieve this, some Growth Areas identified in Figure 11 in the Plan will have their development boundaries removed; other Growth Areas will not have development boundaries defined. There is a risk these policies could work against each other. In combination, these policies send out a mixed message to residents in the villages concerned – on the one hand, it is indicated that rural character will be preserved and yet on the other, with Growth Area designation, that there will be change with some degree of urbanisation. Proposed Change

Details of Changes to be Made:
That Growth Areas indentified in Figure 11 have development boundaries retained and Growth Areas presently without development boundaries have boundaries defined in later DPDs, with consequential amendments made to Paras 3.6 and 3.7.
Council meeting of 16 November 2010 the removal of the development boundaries was raised. The minutes record that Cllr Galley stated: ‘Parishes had been asked for their views on development boundaries in 2007, and some 300 responses had been received which were equally divided for and against keeping the boundaries.

Settlement boundaries should be maintained, but should be expanded where needed to allow for necessary growth. No reference is made here to the removal of the development boundary.

The minutes of the meetings expressly state that consultation had taken place on this issue in both 2007 and 2009 (see, for example, minutes of meeting dated 19 October 2010). 5.2.4 Despite this, the minutes of the 10 November 2010 Committee record ‘Members expressed concerns regarding the proposal to remove a number of development boundaries from some settlements’. The minutes of the 19 October 2010 Committee record ‘The Chairman… felt that the parishes had been consulted and that ward councillors also have a responsibility to liaise with their parishes and feedback through the process’. 5.2.5 At the Maresfield Parish Council meeting of 16 November 2010 the removal of the development boundaries was raised. The minutes record that Cllr Galley stated: ‘Parishes had been asked for their views on development boundaries in 2007, and some 300 responses had been received which were equally divided for and against keeping the boundaries. Possibly not all respondents had comprehended the question. Many parishes could not recall being asked.’ 5.2.6 So, were the Parishes asked? The 2007 Core Strategy Issues and Options did not expressly ask a question about removal. Instead, question 5c asks whether respondents should support the removal of settlement boundaries as set out in policy WSC6 and supporting paragraphs 3.6 and 3.7. Our representation is summarised below: Section of Core Strategy: Policy WCS6 Rural Areas Strategy, paras 3.6 & 3.7Legally Compliant: -Sound: No-Justified: NoEffective: NoConsistent with national policy: No 5.2 Issues 5.2.1 The option for removing boundaries was not asked in either the 2007 or 2009 consultation and no responses were made to suggest that they should be removed § Initial officer comments, based on consultation responses to the 2007 consultation, suggest that boundaries should be retained as a positive planning tool. § Why has the concept of removing development boundaries been introduced? § Where is the evidence for introducing this concept? 5.2.3 The removal of development boundaries was discussed at the WDC Committee meetings towards the end of 2010. 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Indeed, responses highlight the importance of maintaining the boundaries, and, in some instances, extended these. 5.2.9 In relation to question 5c, the agenda paper reports that a number of settlements were suggested where the boundary could be changed. These include Maresfield (see page 58). This is closely related to responses to option 21a asking whether people agreed or disagreed with the possible level of growth potential for Maresfield, which at this point was between 350 – 500 homes. Page 163 summarises responses in regard to the option. Support was made for growth in Maresfield and for a change to the boundary to the south of the village to accommodate this growth. No reference is made here to the removal of the development boundary. 5.2.10 The statement made by Cllr Galley at the Maresfield Parish Council (16 November 2010 – see above) meeting raises another issue. Did the options being consulted upon actually reflect the question the Council was trying to ask, i.e.: should development boundaries be removed from some settlements? If this is the case, and consultees have submitted responses unaware of this, then the consultation undertaken must be flawed. Question 5a is perhaps the closest to asking the question about removal, but it is clearly couched in the context of growth and development, i.e.: should they be maintained, reflecting the status quo, or expanded to allow for growth. The question does not ask whether the boundaries should be removed. 5.2.11 Either way, it is clear from the officer recommendation based on the responses to the 2007 consultation (see page 60) that settlement boundaries are a positive planning tool and should be retained. There is no mention of removal: ‘It would appear that, from the comments received, settlement boundaries are a positive planning policy tool and as an initial recommendation that they should be retained. It is preferable, taking into account the comments raised, that any review of development boundaries should be comprehensive in nature with transparent criteria and consultation. In addition to the use of settlement boundaries, there appears to be some agreement to allowing development in the
countryside to meet local need and this will also need to be considered’. 5.2.12 This recommendation also refers to the use of transparent criteria and consultation when reviewing development boundaries. We can not see (a) any evidence of what transparent criteria have been employed to suggest that the development boundaries should be removed, nor (b) what consultation was undertaken that expressly asked whether the boundaries should be removed. 5.2.13 Para 4.40 of the paper prepared under Agenda Item 8 of the LDF sub Committee on 15th October 2007 states: (i) There is a need for a comprehensive review of boundaries to reflect the current situation on the ground, with appropriate community involvement; (ii) A balance needs to be found between preventing urban sprawl, preventing town cramming and not stifling the development needs of individual communities, particularly where no specific allocations are envisaged. The High Weald AONB Unit was amongst those considering boundaries to have been applied too rigidly and that they have not necessarily taken into account the historic pattern of village development. (iii) That any redefinition of settlement boundaries should have regard to the need to retain the distinct and separate identify of nearby settlements; (iv) Not to limit appropriate design and force high densities in locations where new development is proposed; (v) There could be a need for settlement boundaries to be drawn for villages not identified for growth in any event; (vi) There could be a need to redraw more tightly the boundaries for certain villages, a view shared (cautiously) by the South Downs Joint Committee. (vii) The need for well-defined and systematic criteria for defining settlement boundaries and for the selection of settlements where settlement boundaries should be applied. 5.2.14 This response: (a) acknowledges support for the retention of settlement boundaries; (b) that, even in those settlements where there would be no growth, settlement boundaries are required; and (c) there is a need for a well-defined and systematic criteria for defining settlement boundaries and where they should be applied. It is quite clear that there is no intention to remove development boundaries and, in fact, the consultation strengthened the rationale for retention and, where appropriate, modification and expansion. 5.2.15 The 2009 Spatial Options consultation presents options in regard to the quantum and distribution of growth across the District, but does not present options about settlement boundaries nor ask whether they should be removed. 5.2.16 Although responses were made to the 2009 consultation in terms of the level of growth that might be appropriate and which spatial growth option should be progressed, there is no specific response which states that the Maresfield development boundary should be removed.

**Details of Changes to be Made:**

**SUMMARY** 5.2.17 In conclusion, we contend that the Core Strategy is unsound because: 1. it is not justified because (i) it is not based on evidence as no question was asked and (ii) it has not been considered against alternatives; 2. it is not effective, because it is not flexible; and 3. it is not consistent with national policy, specifically that set out in the Local Growth White Paper. 5.2.18 Representations made in previous sections indicate that the level of housing growth set out in the submission Core Strategy is too low, that the housing distribution and trajectory should be reconsidered, and that Maresfield is a suitable and sustainable location to accommodate additional housing growth. We thus suggest that Maresfield should (a) have a settlement boundary, and (b) that this should be drawn to allow for additional housing growth.
4.1 Introduction 4.1.1 This section of our representations refers to the settlement hierarchy set out in the proposed submission Core Strategy. Our representation is summarised below: Section of Core Strategy: Table 1, Settlement Hierarchy Figure 2, Settlement Hierarchy, and Paras 3.2 – 3.7.Legally Compliant: -Sound: No-Justified: No-Effective: No-Consistent with national policy: - 4.2 Issues 4.2.1 In the Core Strategy, the Settlement hierarchy is a key determinant in distributing housing growth across settlements. It has been used at all stages in the plan process. However, the terminology to describe settlements at different levels of the hierarchy has changed and the criteria have been incorrectly applied. The results of this are that Maresfield has been classified incorrectly and the potential to accommodate growth here has thus been underplayed. The issues here are thus: § The assessment of Maresfield against the criteria used to classify villages in the hierarchy has changed over time § The assessment has been inappropriately applied. It does not, in Maresfield, acknowledge the employment offer that will be forthcoming at the Ashdown Business Park, even though this has planning permissions § The assessment is static and does not allow for change or reclassification over time § Why has the classification and thus the associated potential for development changed between different iterations of the Core Strategy? 4.2.2 We present this section in chronological order, starting with the 2007 Core Strategy Issues and Options, through the 2009 Spatial Options to the 2011 Proposed Submission Core Strategy. 2007 Core Strategy Issues and Options: 4.2.3 The 2007 Draft Settlement Strategy for the Villages (Core Strategy Issues and Options Background Paper) identifies Maresfield as a local service centre and a village with growth potential. It states (para 6.49): 'Maresfield is a Smaller Local Service Centre and is within 5km of Uckfield (2.1miles/3.4km). It is also 2.3 miles/3.7km from the mainline station at Buxted. The village has a development boundary and is not subject to significant planning constraints. Part of the village however, is designated as a Conservation Area, which extends beyond the development boundary. There are flood zones to the east and west of the village, and the settlement is surrounded by parcels of ancient woodland'. 4.2.4 At this time, the Council identified the potential level of growth in Maresfield as being between 350 – 500 new homes. 2009 Core Strategy Spatial Options 4.2.5 In the 2009 Rural Settlement Classification (Core Strategy Spatial Options Background Paper 6), the status of Maresfield had changed to an ‘Accessible Settlement with Limited Facilities’. The Rural Settlement Classification allocated the following amount of homes to each settlement type: § Accessible Local Service Centre: 250 dwellings § Local Service Centre: 150 dwellings § Accessible Settlement with Limited Facilities: 100 dwellings § Accessible Settlement: 40 dwellings. 4.2.6 Under these criteria, Maresfield would be a location for 100 new homes. The potential level of housing development increases to 250 dwellings for ‘accessible local service centres’. There are only two criteria which differentiate an ‘accessible local service centre’ from an ‘accessible settlement with limited facilities’; the former benefiting from a GP service and a business area or ‘other locally significant employment opportunities’. Maresfield meets the second of these given the recent planning permission for the Ashdown Business Park. 4.2.7 Furthermore in Barratt’s consultation response submitted to the 2009 Core Strategy Spatial Options we stated that the inclusion of the existence of a GP surgery within the criteria is considered inappropriate as it does not recognise the functional relationships between settlements whereby villages in close proximity will share facilities which none in their own right would have the scale of population to support. PPS 3 paragraph 38 makes this point. The nearest GP surgeries to Maresfield are in Buxted and Uckfield, both of which are within 5 km of Maresfield. We would also contend that the future pattern of provision of rural GP surgeries is uncertain and not a robust basis on which to allocate development to individual settlements. Given the above, we recommended that the criteria be changed to ‘access to health care facilities by sustainable modes of travel’ rather than provision of a GP service within the settlement itself. 2011 Core Strategy Submission Draft 4.2.8 Policy WSC6 establishes that provision will be made for at least 455 new dwellings across the following categories of settlement: service centre, local service centre, neighbourhood centre and unclassified settlements. Table 1 and associated Figure 2 of the Submission Core Strategy classify Maresfield as a Neighbourhood Centre. The rationale for this is set out in Appendix 3 to the Core Strategy Background Paper 1: Development of the Proposed Submission Core Strategy (February 2011). Appendix 4 establishes how each settlement was classified. 4.2.9 We contend that the settlement classification significantly underplays the role and potential of Maresfield. Criteria for classifying settlements include presence of a ‘business area’ and ‘other locally significant employment opportunities’. Maresfield receives a cross against both of these. This ignores the fact that the Ashdown Business Park, which received planning permission in 2010, is located in Maresfield. The submission Core Strategy acknowledges this at para 3.21, so why does the settlement hierarchy not take this into consideration? 4.2.10 We have compared the assessment undertaken in the Background Paper with the draft Settlement Strategy for the Villages (July 2007, Core Strategy Issues and
Options) and the Rural Settlement Classification (July 2009, Core Strategy Spatial Development Options Background Paper). In both the 2007 and 2009 classifications, Maresfield receives a tick against both ‘business area’ and ‘other locally significant employment opportunities’. There is no reason why the assessment set out in the February 2011 background paper should change this, particularly given that the Ashdown Business Park now has planning permission. 4.2.11 The Councils Employment Land review identifies the Ashdown Business Park as the most strategically significant employment site in North Wealden. It will provide in the region of 600 – 700 jobs in a mix of office and B1 light industrial space. The planning application submitted for the Business Park makes the link between housing and employment growth and contribution to sustainable patterns of development and local employment opportunities. Para 3.18 of the submission Core Strategy states ‘The strategy is aimed at increasing the opportunity for people to work close to where they live’. 4.2.12 The criteria for assessing Maresfield also include a cross against ‘provision of changing facilities’ (for sports). Again, this is incorrect. Changing facilities exist at the recreation ground – for football and cricket – and at the Bowls Club. 4.2.13 So, the question here is why has the classification of Maresfield has changed from a local centre with growth potential (in 2007) to a Neighbourhood Centre with limited potential (in 2011), bearing in mind that the criteria have effectively remained the same and that, as we point out above, the assessment actually underplays the potential of Maresfield? The justification and rationale for changing the classification of Maresfield is not clear. 4.2.14 The Core Strategy aspires to retaining the rural character and high quality environment of the district, whilst also providing sufficient growth to improve the performance of the economy, regenerate market towns and provide a more vital future for villages. 4.2.15 However, the settlement classification is static and does not allow for any reclassification of settlements during the period covered by the LDF. It does not acknowledge that villages may become more sustainable through additional population arising from new development increasing the viability of local shops and services. PPS 3 is clear here that the need for housing provision in rural areas, not only in market towns and local service centres but also in villages in order to enhance or maintain their sustainability.

Details of Changes to be Made:

SUMMARY 4.2.16 In summary, we contend that the assessment is incorrect, previous consultation responses have not been addressed and the potential for growth and change in Maresfield is being suppressed. The assessment should be reconsidered in light of the planning permission granted for the Ashdown Business Park and the potential for balancing homes and jobs in this part of the district recognised. 4.2.17 We thus contend that, on this matter, the Core Strategy is unsound, because: 1. It is not justified, as the evidence used is incorrect; and 2. It is not effective, as the boundaries are ‘static’ and thus not flexible.

Representation ID
37

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Details of Reasons for Soundess/ Legal Complaince:

Table 1 Settlement Hierarchy : Polegate and Stone Cross should be included in the District Centre category not Service Centre as this would raise its status comparable with settlements identified for growth within the Wealden District.

Details of Changes to be Made:

Table 1 District Centre Polegate and Stone Cross
Details of Reasons for Soundess/ Legal Complaince:
We support the identification of the hierarchy of settlements indentified in Table 1 which outlines the role and function of individual towns and villages to inform the future allocation of development and growth. Furthermore we support the settlement classification of Primary Centres, Secondary Centres, District Centres, Service Centres, Local Service Centres, Neighbourhood Centres and Other Unclassified Settlements. This hierarchy and classification is important in identifying those places that "have the greatest amount and range of employment, community facilities and support services, and which are best served by public transport" (Para3.3) and thus guiding future development. In the context of the above we further support the identification of Horam as a Local Service Centre, defined as "Settlements that have a more limited supply of social and economic infrastructure including employment and where local residents depend upon other centres to meet a broad range of needs with some form of accessibility to those centres" (Table 1: Settlement Hierarchy) Given this role we support the contribution the settlement can make in providing a focus for future development as outlined in paragraph 3.4 which states "Evidence confirms that if more sustainable patters of living are to be promoted, the large majority of future planned growth in Wealden needs to be focused on the towns and larger villages in the hierarchy, where facilities, services and site opportunities exist." The acceptability of Horam as an appropriate location for future development is further confirmed within Policy WCS6- Rural Areas Policy, which is subject to separate representation.

Details of Changes to be Made:

Representation ID
75
Person ID 337596 Redrow Homes (Eastern) Agent ID 518363 Boyer Planning Ltd

Settlement Hierarchy Table 1

Sound ☑ Yes ☐ No ☐ Justified ☐ Effective ☐ Consistent with national policy
Legally Compliant ☑ Yes ☐ No

Details of Reasons for Soundess/ Legal Complaince:
In a District such as Wealden where "the rural areas outside of the main urban areas cover almost 93% of Wealden District. And contain around 50% of its population" (para 6.43 of the Core Strategy) it is important that the principles as outlined in para 3 of PPS7: Sustainable Development in Rural Areas are adhered to, in that, within rural areas "most new development [should be focused] in or near to local service centres where employment, housing (including affordable housing), services and other facilities can be provided close together". The paragraph continues that "These centres (which might be a country town, a single large village or a group of villages) should be identified in the development plan as the preferred location for such development". The acceptability of Horam as a Local Service Centre and this its role in accommodating new development is further highlighted in para 7.19 of the supporting Sustainability Appraisal which states that "Rotherfield, Horam and East Hoathly perform well in sustainability terms and feature higher in the SA hierarchy, due to strong social and economic assessments". In the context of above we support the inclusion of Horam within the settlement categorisation of Local Service Centre as per Table 1: Settlement Hierarchy and the proposed allocation at Horam of 100 additional dwellings as contained in Policy WCS6 - Rural Area Strategy.

Details of Changes to be Made:
Representation ID 503
Person ID 522134  Agent ID 503
Ashdown  Natural England
Settlement Hierarchy Table 1
Sound ☑ Yes ☐ No ☐ Justified ☐ Effective ☐ Consistent with national policy
Legally Compliant ☐ Yes ☐ No
Details of Reasons for Soundness/ Legal Compliance:

Details of Changes to be Made:

Representation ID 674
Person ID 106740  Agent ID 674
Mrs Roberts  Chiddingly Parish Council
Settlement Hierarchy Table 1
Sound ☐ Yes ☐ No ☐ Justified ☐ Effective ☐ Consistent with national policy
Legally Compliant ☐ Yes ☐ No
Details of Reasons for Soundness/ Legal Compliance:
Chiddingly/Muddles Green should not be considered as an unclassified settlement. The services provided in the area should be equal to those of other settlements that are classified as neighbourhood centres e.g. Upper Dicker and Ripe.

Details of Changes to be Made:

Representation ID 720
Person ID 103740  Agent ID 720
Mr Wheeler
Settlement Hierarchy Table 1
Sound ☐ Yes ☐ No ☐ Justified ☐ Effective ☐ Consistent with national policy
Legally Compliant ☐ Yes ☐ No
Details of Reasons for Soundness/ Legal Compliance:
The designation of some villages is not well thought out. Maresfield is designated a Neighbourhood centre whilst Buxted a Local Service Centre. Maresfield has a good road network, a bus service and accessible employment. Buxted on the other hand does not. Maresfield should be reclassified.

Details of Changes to be Made:
Details of Reasons for Soundess/ Legal Complaince:

WJPC is concerned at the numerous references to Polegate and Willingdon as one settlement, as highlighted in 3.3 Table 1, 3.11, SPO6, WCS2, WCS3, 5.13, 6.31(2), Figure 8 and Figure 12. In particular, Figure 2 showing settlement hierarchy, places Polegate and Willingdon as one settlement, yet details other settlements individually.

Details of Changes to be Made:

Change Maresfield to where it should be a Local Service Centre. Retain a development boundary. Allocate 300 to 400 houses to Maresfield to allow workers at the Ashdown Business Park to live where they work, and not have to travel in by car from other parts of the area.

Details of Reasons for Soundess/ Legal Complaince:

Object to the inclusion of Maresfield as a neighbourhood centre when it is clearly much more than this, and should be a Local Service Centre. Maresfield is much larger than the other villages in the neighbourhood centre group and contrary to the council’s assessment has similar or greater facilities than most of those in the Local Service Centre group. In particular it is immediately adjacent to the Ashdown Business Park which is planned to provide 1000 jobs. It also has as many if not more shops, garages, pubs than most of the LSC Group and certainly has much more than those in the NC group. In particular if Buxted is considered a LSA where there is minimal local employment, no more shops than Maresfield, no garage, and the local shop appears to have closed, is considered an LSC then clearly Maresfield should also be in this group. Maresfield should retain a development boundary. given that the council state that one of the aims of the strategy is to limit car travel and enable people to live where they work, clearly the uniqueness of Maresfield having the large employment site next to it means much more new housing should be allowed there as well. As otherwise as things stand at the moment, with the small older retired current population in Maresfield, the vast majority of workers at the Ashdown Business Park will have to drive in from other parts of the area.

Details of Changes to be Made:

Change Maresfield to where it should be a Local Service Centre. Retain a development boundary. Allocate 300 to 400 houses to Maresfield to allow workers at the Ashdown Business Park to live where they work, and not have to travel in by car from other parts of the area.

Details of Reasons for Soundess/ Legal Complaince:

Rydon supports the identification of Stone Cross as a ‘Service Centre’ and the role it plays in serving the wider community and rural issues.

Details of Changes to be Made:
Representation ID 1305
Person ID Mr Ankers Agent ID
106660 South Downs Society

Settlement Hierarchy Table 1

Sound ☑ Yes ☐ No ☐ Justified ☐ Effective ☐ Consistent with national policy
Legally Compliant ☐ Yes ☐ No

Details of Reasons for Soundess/ Legal Complaince:
The settlement hierarchy: we welcome the recognition of Alfriston as a local service centre and of East Dean as a neighbourhood centre.

Details of Changes to be Made:

Representation ID 1359
Person ID Mr Richardson Agent ID
220620 Gleeson Developments Ltd

Settlement Hierarchy Table 1

Sound ☑ Yes ☐ No ☐ Justified ☐ Effective ☐ Consistent with national policy
Legally Compliant ☐ Yes ☐ No

Details of Reasons for Soundess/ Legal Complaince:
We support the Councils identification of Hailsham as a District Centre, with its range of facilities that are capable of supporting growth. The representations are submitted by Gleeson Developments and relate to the proposed submission draft Core Strategy and specifically to land east of Battle Road, Hailsham. We are promoting the land jointly with the landowner. The land is located to the east of the settlement of Hailsham and within SD2. The Council have in identifying land at SD2 & SD3 via policy WCS4 recognised that Hailsham is capable of supporting development. Hailsham is a sustainable settlement with a number of services and amenities that serve the settlement and wider community. The land to which these representations relate has been recognised as being adjacent to the settlement boundary with access to the existing road network and is well related to the existing residential area of Hailsham. The site could accommodate a wide range of dwelling numbers and types, as well as other community services and facilities. The land is under the control of a single family, with Gleeson Developments having an interest in the land. The site can achieve the delivery of residential development in accordance with the tests within PPS3.

Details of Changes to be Made:
Representation ID
1355
Person ID  Mr  Richardson
Gleeson Homes
Agent ID
Settlement Hierarchy  Table 1
Sound  ☑ Yes  ☐ No  ☐ Justified  ☐ Effective  ☐ Consistent with national policy
Legally Compliant  ☐ Yes  ☐ No

Details of Reasons for Soundness/ Legal Compliance:
We support the Council's identification of Uckfield as a District Centre, as this confirms that the settlement is capable of supporting growth. The representations are submitted by Gleeson Developments and relate to the proposed submission draft Core Strategy and specifically to land east of Battle Road, Hailsham. We are promoting the land jointly with the landowner. The land is located to the east of the settlement of Hailsham and within SD2. The Council have in identifying land at SD2 & SD3 via policy WCS4 recognised that Hailsham is capable of supporting development. Hailsham is a sustainable settlement with a number of services and amenities that serve the settlement and wider community. The land to which these representations relate has been recognised as being adjacent to the settlement boundary with access to the existing road network and is well related to the existing residential area of Hailsham. The site could accommodate a wide range of dwelling numbers and types, as well as other community services and facilities. The land is under the control of a single family, with Gleeson Developments having an interest in the land. The site can achieve the delivery of residential development in accordance with the tests within PPS3.

Details of Changes to be Made:
Yes  Sound  ☑ Yes  ☐ No  ☐ Justified  ☐ Effective  ☐ Consistent with national policy
Legally Compliant  ☐ Yes  ☐ No

Representation ID
1487
Person ID  Mr  Nightingale
Millwood Designer Homes
Agent ID  Mr  Nightingale
Kember Loudon Williams
Settlement Hierarchy  Table 1
Sound  ☐ Yes  ☑ No  ☑ Justified  ☐ Effective  ☐ Consistent with national policy
Legally Compliant  ☐ Yes  ☐ No

Details of Reasons for Soundness/ Legal Compliance:
The Core Strategy is unsound because it has defined Heathfield incorrectly within the settlement hierarchy. This is unjustified. It should be viewed as a ‘District Centre’ and not as a ‘Service Centre’. The town fulfils the functions and characteristics of a District Centre as defined on table 1. It is a far more important settlement within the district than the Council has suggested. Indeed the Council itself identifies Heathfield as one of the five main towns in the District in paragraph 2.3 of the Proposed Core Strategy and Policy SP04 which refers to “our five principle towns”. The character of the town is very different to the other Service Centres identified. It is a largely self-contained settlement, with a wide range of services and facilities, that serves a distinct part of the district. 2 Paragraph 3.4 states that, “the large majority of future planned growth in Wealden needs to be focused on the towns and larger villages in the hierarchy, where facilities services and site opportunities exist. It is considered that the Council has under-estimated the current and future roles that Heathfield can play in this respect by failing to properly recognise the character and function of the town. 3 In order to make the Core Strategy sound, Heathfield should be redefined within the Settlement hierarchy as a District Centre.

Details of Changes to be Made:
Heathfield should be re-defined in the Settlement Hierarchy as a District Centre
Details of Reasons for Soundess/ Legal Complaince:
The Wealden settlement hierarchy does not adequately reflect the settlement structure in the district and, as such, it is unsound. Westham should be identified as a Service Centre due to the facilities and employment areas it contains. The hierarchy constrains positive development in lower order settlements, that may contribute to sustainable growth of the area. paragraph 3.4 should clarity that some local service centres are capable of accommodating sustainable growth.

Details of Changes to be Made:
The Wealden settlement hierarchy should be redrafted to reflect the settlement structure in the district and allow for growth to meet future economic and social needs. We consider that Westham should be allocated as a service centre due to the facilities and employment areas it contains. Paragraph 3.4 should clarify that some local service centres are capable of accommodating sustainable growth. Please see Indigo Planning letter dated 15 April 2011

Details of Reasons for Soundess/ Legal Complaince:
1. The Core Strategy is unsound because it has defined Heathfield incorrectly within the settlement hierarchy. This is unjustified. It should be viewed as a ‘District Centre’ and not as a ‘Service Centre’. The town fulfils the functions and characteristics of a District Centre as defined on Table 1. It is a far more important settlement within the district than the Council has suggested, evidenced in the Core Strategy paragraph 2.3 which identifies Heathfield as one of the five main towns in the district and in Policy SP04 which refers to "our five principal towns". The character of the town is very different to the other Service Centres identified. It is a largely self-contained settlement, with a wide range of services and facilities that serves a distinct part of the district. Due to the size of additional appendices they have not been uploaded but are available to view at the Council's offices.

Details of Changes to be Made:
2. Paragraph 3.4 states that, “the large majority of future planned growth in Wealden needs to be focused on the towns and larger villages in the hierarchy, where facilities services and site opportunities exist. It is considered that the Council has under-estimated the current and future roles that Heathfield can play in this respect by failing to properly recognise the character and function of the town.
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### Soundness/ Legal Compliance

<table>
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<tr>
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### Details of Reasons for Soundness/ Legal Complaince:
St Richards Church supports to identification of Crowborough as a district centre and considers that this is a key matter in determining the potential and the need for growth in the town. The status of district centre acknowledges that the town has potential to accommodate growth without reliance on outside areas and that any growth occurring in this location is sustainable. It believes that Crowborough has an importance within the northern part of Wealden District which supports a strategy of growth for the town and that the growth should be of a size to support the adequate provision of local services for the town and the surrounding rural areas reliant on Crowborough. We consider that this should be reflected in the housing and employment allocations set out in the core strategy.

### Details of Changes to be Made:

- Yes
- Sound
- Justified
- Effective
- Consistent with national policy

- Yes
- Legally Compliant
- No
The following representations are made by Smiths Gore on behalf of the Trustees of the Firle Estate. The Estate are significant local landowners in the southern part of the District as well as in the adjoining part of Lewes District. As such, the Trustees take a great deal of interest in the emerging planning policy framework in Wealden, and are particularly keen that the southern part of the District is developed and allowed to grow in a way that is sustainable and proportionate to the capacity for that part of the District to support additional development. The representations outlined below focus on the Estate’s landholdings in and around the settlement of Berwick Station. As the Council will know, this area has been under consideration for a possible new settlement of 1500-2000 dwellings, indeed being included within the shortlist of three possible locations. It is clear that the presence of the excellent transport links in the form of the location of a well served train station in the Village combined with easy access to the trunk road network via the A27 meant that Berwick is considered a particularly sustainable location for housing growth. Around this time, Atkins was commissioned to assess the capacity of the Village and put forward suggested development options. The Atkins report, Land at Berwick Station: Proposed Rural Housing Development provides a good deal of background which Smiths Gore do not intend to repeat, including the Gage family’s discomfort at the level of growth then being discussed for Berwick. As responsible local landowners and community members, the family feel quite strongly that development of Villages such as Berwick Station should be allowed to happen in an organic, incremental way so as not to overwhelm existing communities or outpace the provision of social and physical infrastructure. That is not to say however, that growth should not be properly planned and the existing Atkins study should perhaps be seen as a much longer term vision of where Berwick Station may wish to head towards. With that in mind, Smiths Gore have been asked to prepare and submit the following representations to the Core Strategy which we hope will be taken into account during the examination of the Development Plan Document. We and the Estate look forward to a continued positive and effective relationship with the Local Development Framework process.

Core Strategy Representations

This paragraph, and the settlement strategy set out in Table 1, is considered to be inconsistent with national policy insofar as it relates to the need to promote sustainable patterns of development, particularly in relation to public transport accessibility and/or means other than the private car (PPS1, PPS3 and PPS7). This is particularly important for Wealden District since, as stated in Para.5.21 of Background Document 1, The Development of Proposed Submission Core Strategy, the many areas of poor public transport accessibility has led to a heavy reliance on the use of the private motor vehicle. It is therefore vitally important that the distribution of development moving forward does not exacerbate this issue. Whilst it is not suggested that public transport accessibility should be the only consideration, it is suggested that the definition of Accessible Settlements set out in the 2009 Spatial Development Options Background Paper Rural Settlement Classification, is perhaps more consistent with national planning policy than the current strategy and should be re-included. In addition, PPS3 requires LPAs to give consideration to the functional relationship between settlements in rural areas, and it is considered that the relative sustainability of smaller settlements that may in themselves have limited facilities, may in fact be greatly enhanced through a close functional relationship with larger dwellings. Arguably therefore, housing growth in such settlements would be as sustainable as development adjoining the urban area of those larger settlements. To use the example of Berwick Station, the extremely close functional relationship with the Primary Centres of Lewes and Eastbourne, make this Village, as well as all villages that are within easy walking of cycling distance such as Alciston, Berwick and Selmeston much more sustainable that they are if viewed in isolation. Unfortunately the fact that these Primary Centres are located outside of the plan area has meant that this relationship has not been explored more fully. It is also suggested that the Settlement Hierarchy is not justified since it is also not clear how the decisions that led up to the identification of various categories of settlement are supported by evidence. In particular, it would appear that weighting has been afforded to some facilities, for example primary school provision but not to others such as public transport provision that may be more significant indicators of the sustainability of a settlement. However, since no evidence is provided or indeed does there appear to have been any meaningful consultation around this point during earlier rounds of community involvement, it is impossible to counter this assumption. At the same time, the contribution of certain facilities that have been listed in the matrix that was attached to the 2009 Rural Settlement Classification appears to be arbitrary and not necessarily, it is suggested, good indicators of the vitality or indeed capacity for growth of a settlement. Turning to two examples within the south of the District, Horam and Herstmonceaux are both identified within the Rural Strategy for relatively significant levels of growth, 100 and 70 dwellings respectively. However, neither settlement are served by train stations and whilst bus based public transport is available, it is suggested relying on this mode of transport will not lead to greater uptake of public transport.
transport as would be the case if settlements that are served by rail services were identified for a similar level of growth. This is recognised in the Sustainability Assessment that accompanies the Core Strategy where Herstmonceaux in particular scores particularly low on environmental sustainability.

Details of Changes to be Made:
Whilst it is not suggested that public transport accessibility should be the only consideration, it is suggested that the definition of Accessible Settlements set out in the 2009 Spatial Development Options Background Paper Rural Settlement Classification, is perhaps more consistent with national planning policy than the current strategy and should be re-included. In addition, the Settlement Strategy should be amended to give consideration to the functional relationship between settlements in rural areas. This should include the close functional relationship exhibited by the villages of Alciston, Berwick, Berwick Station and Selmeston as well as the relationship that these villages have – though the station at Berwick Station – with the Primary Centres of Lewes and Eastbourne. The Core Strategy should also provide evidence in support of the weighting that has been applied to the provision of certain facilities in rural settlements, backed up by empirical evidence about what facilities serve to make such communities – and the wider rural area – sustainable. Lastly, the settlement strategy should differentiate between rail based and bus based public transport provision – in order to take account of the relative attractiveness and therefore use of the former over the latter.

Representation ID
1628
Person ID Pelham Homes 107745
Agent ID Mrs Owen 102625
Jennifer Owen & Associates Ltd.
Settlement Hierarchy Table 1
Sound ☑ Yes ☐ No ☐ Justified ☐ Effective ☐ Consistent with national policy
Legally Compliant ☐ Yes ☐ No

Details of Reasons for Soundess/ Legal Complaince:
"Supplementary documents have been submitted but not attached, and may be viewed at the Council offices on request".

Details of Changes to be Made:
REVISION SOUGHT . Amend to place Polegate/Willingdon as a District Centre to take into account the Secondary School at Willingdon which is spatially as close as secondary schools at Crowborough, Uckfield and Hailsham to the majority of residents in the town. also to reflect the importance of the mainline railway station at Polegate. The lack of public transport opportunities at Hailsham should also be noted.
4.1 Introduction

This section of our representations refers to the settlement hierarchy set out in the proposed submission Core Strategy. Our representation is summarised below: Section of Core Strategy: Table 1, Settlement Hierarchy Figure 2, Settlement Hierarchy, and Paras 3.2 – 3.7

Legally Compliant: -Sound: No -Justified: No -Effective: No -Consistent with national policy: Yes

4.1.1 This section of our representations refers to the settlement hierarchy set out in the proposed submission Core Strategy. Our representation is summarised below: Section of Core Strategy: Table 1, Settlement Hierarchy Figure 2, Settlement Hierarchy, and Paras 3.2 – 3.7

Legally Compliant: -Sound: No -Justified: No -Effective: No -Consistent with national policy: Yes

4.2 Issues

4.2.1 In the Core Strategy, the Settlement hierarchy is a key determinant in distributing housing growth across settlements. It has been used at all stages in the plan process. However, the terminology to describe settlements at different levels of the hierarchy has changed and the criteria have been incorrectly applied. The results of this are that Maresfield has been classified incorrectly and the potential to accommodate growth here has thus been underplayed. The issues here are thus: § The assessment of Maresfield against the criteria used to classify villages in the hierarchy has changed over time § The assessment has been inappropriately applied. It does not, in Maresfield, acknowledge the employment offer that will be forthcoming at the Ashdown Business Park, even though this has planning permissions § The assessment is static and does not allow for change or reclassification over time § Why has the classification and thus the associated potential for development changed between different iterations of the Core Strategy?

4.2.2 We present this section in chronological order, starting with the 2007 Core Strategy Issues and Options, through the 2009 Spatial Options to the 2011 Proposed Submission Core Strategy. 2007 Core Strategy Issues and Options: 4.2.3 The 2007 Draft Settlement Strategy for the Villages (Core Strategy Issues and Options Background Paper) identifies Maresfield as a local service centre and a village with growth potential. It states (para 6.49): ‘Maresfield is a Smaller Local Service Centre and is within 5km of Uckfield (2.1miles/3.4km). It is also 2.3 miles/3.7km from the mainline station at Buxted. The village has a development boundary and is not subject to significant planning constraints. Part of the village however, is designated as a Conservation Area, which extends beyond the development boundary. There are flood zones to the east and west of the village, and the settlement is surrounded by parcels of ancient woodland’. 4.2.4 At this time, the Council identified the potential level of growth in Maresfield as being between 350 – 500 new homes. 2009 Core Strategy Spatial Options 4.2.5 In the 2009 Rural Settlement Classification (Core Strategy Spatial Options Background Paper 6), the status of Maresfield had changed to an ‘Accessible Settlement with Limited Facilities’. The Rural Settlement Classification allocated the following amount of homes to each settlement type: § Accessible Local Service Centre: 250 dwellings § Local Service Centre: 150 dwellings § Accessible Settlement with Limited Facilities: 100 dwellings § Accessible Settlement: 40 dwellings

Under these criteria, Maresfield would be a location for 100 new homes. The potential level of housing development increases to 250 dwellings for ‘accessible local service centres’. There are only two criteria which differentiate an ‘accessible local service centre’ from an ‘accessible settlement with limited facilities’; the former benefiting from a GP service and a business area or ‘other locally significant employment opportunities’.

Maresfield meets the second of these given the recent planning permission for the Ashdown Business Park. 4.2.7 Furthermore in Barratt’s consultation response submitted to the 2009 Core Strategy Spatial Options we stated that the inclusion of the existence of a GP surgery within the criteria is considered inappropriate as it does not recognise the functional relationships between settlements whereby villages in close proximity will share facilities which none in their own right would have the scale of population to support. PPS 3 paragraph 38 makes this point. The nearest GP surgeries to Maresfield are in Buxted and Uckfield, both of which are within 5 km of Maresfield.

We would also contend that the future pattern of provision of rural GP surgeries is uncertain and not a robust basis on which to allocate development to individual settlements. Given the above, we recommended that the criteria be changed to ‘access to health care facilities by sustainable modes of travel’ rather than provision of a GP service within the settlement itself. 2011 Core Strategy Submission Draft 4.2.8 Policy WSC6 establishes that provision will be made for at least 455 new dwellings across the following categories of settlement: service centre, local service centre, neighbourhood centre and unclassified settlements. Table 1 and associated Figure 2 of the Submission Core Strategy classify Maresfield as a Neighbourhood Centre. The rationale for this is set out in Appendix 3 to the Core Strategy Background Paper 1: Development of the Proposed Submission Core Strategy (February 2011).

Appendix 4 establishes how each settlement was classified. 4.2.9 We contend that the settlement classification significantly underplays the role and potential of Maresfield. Criteria for classifying settlements include presence of a ‘business area’ and ‘other locally significant employment opportunities’. Maresfield receives a cross against both of these. This ignores the fact that the Ashdown Business Park, which received planning permission in 2010, is located in Maresfield. The submission Core Strategy acknowledges this at para 3.21, so why does the settlement hierarchy not take this into consideration? 4.2.10 We have compared the assessment undertaken in the Background Paper with the draft Settlement Strategy for the Villages (July 2007, Core Strategy Issues and
Options) and the Rural Settlement Classification (July 2009, Core Strategy Spatial Development Options Background Paper). In both the 2007 and 2009 classifications, Maresfield receives a tick against both ‘business area’ and ‘other locally significant employment opportunities’. There is no reason why the assessment set out in the February 2011 background paper should change this, particularly given that the Ashdown Business Park now has planning permission. 4.2.11 The Councils Employment Land review identifies the Ashdown Business Park as the most strategically significant employment site in North Wealden. It will provide in the region of 600 – 700 jobs in a mix of office and B1 light industrial space. The planning application submitted for the Business Park makes the link between housing and employment growth and contribution to sustainable patterns of development and local employment opportunities. Para 3.18 of the submission Core Strategy states ‘The strategy is aimed at increasing the opportunity for people to work close to where they live’. 4.2.12 The criteria for assessing Maresfield also include a cross against ‘provision of changing facilities’ (for sports). Again, this is incorrect. Changing facilities exist at the recreation ground – for football and cricket – and at the Bowls Club. 4.2.13 So, the question here is why has the classification of Maresfield has changed from a local centre with growth potential (in 2007) to a Neighbourhood Centre with limited potential (in 2011), bearing in mind that the criteria have effectively remained the same and that, as we point out above, the assessment actually underplays the potential of Maresfield? The justification and rationale for changing the classification of Maresfield is not clear. 4.2.14 The Core Strategy aspires to retaining the rural character and high quality environment of the district, whilst also providing sufficient growth to improve the performance of the economy, regenerate market towns and provide a more vital future for villages. 4.2.15 However, the settlement classification is static and does not allow for any reclassification of settlements during the period covered by the LDF. It does not acknowledge that villages may become more sustainable through additional population arising from new development increasing the viability of local shops and services. PPS 3 is clear here that the need for housing provision in rural areas, not only in market towns and local service centres but also in villages in order to enhance or maintain their sustainability.

Details of Changes to be Made:
SUMMARY 4.2.16 In summary, we contend that the assessment is incorrect, previous consultation responses have not been addressed and the potential for growth and change in Maresfield is being suppressed. The assessment should be reconsidered in light of the planning permission granted for the Ashdown Business Park and the potential for balancing homes and jobs in this part of the district recognised. 4.2.17 We thus contend that, on this matter, the Core Strategy is unsound, because: 1. It is not justified, as the evidence used is incorrect; and 2. It is not effective, as the boundaries are ‘static’ and thus not flexible.

Representation ID
1717
Person ID 107752
Agent ID 102592
Gall Heron Land Developments Ltd. Mr Groves
Boyer Planning Limited
Settlement Hierarchy Table 1
Sound ☑ Yes ☐ No ☐ Justified ☐ Effective ☐ Consistent with national policy
Legally Compliant ☑ Yes ☐ No

Details of Reasons for Soundess/ Legal Complaince:
3.2 Table Settlement Hierarchy 3.2.1. It is considered that the identification of Uckfield as a District Centre is an appropriate classification for the settlement which is both legally compliant and sound. The settlement meets the requirements of the classification being an accessible settlement by road and public transport containing a range of shops, employment opportunities and facilities including secondary school. 3.2.2 As such it is considered that the settlement is an appropriate location for development in the District due to its sustainability credentials. Although District Centre is not the highest classification of settlement overall, it is the highest type found within Wealden District. Consequently Uckfield is identified as forming one of the main three settlements located within the District

Details of Changes to be Made:
Representation ID
1589
Person ID  Ognjanovic  Agent ID  Polegate Town Council
522137
Settlement Hierarchy  Table 1
Sound  ☑ Yes  ☑ No  ☐ Justified  ☐ Effective  ☐ Consistent with national policy
Legally Compliant  ☐ Yes  ☐ No

Details of Reasons for Soundness/ Legal Complaince:
Concern raised at the reference to Polegate and Willingdon as one settlement

Details of Changes to be Made:
classification of rural settlements is based on flawed and incomplete assessment of relevant considerations. 3.2 Introduction 3.2.1 Section 3 of the Consultation document sets out key elements of the Wealden Spatial Strategy and in particular the Council's approach to settlement classification. Decisions taken on this matter are extremely significant in so far as the hierarchy provides the basis for the distribution of development. In respect of rural settlements in particular, it results in the distinction being drawn between those settlements where new development will be allowed and others where it will not. 3.2.2 In our submission the approach to the categorisation of rural settlements is based on a flawed assessment of settlement characteristics and the role that new development can play in sustaining and enhancing vitality in rural areas, consistent with national policy as set out above. 3.2.3. Our objections to the settlement hierarchy focus on the village of Framfield which falls within the designation "other unclassified settlement" in Table 1 on page 10 of the Core Strategy. By virtue of this classification, the Core Strategy describes the function of Framfield in the following terms - a settlement "with few or no facilities and services, and where further development would be unsustainable". 3.2.4. As such no development provisions are made for Framfield and it is proposed that the designated settlement boundary is removed in a subsequent DPD. Our clients contest this proposal and consider it to be unsound. 3.2.5 It is instructive to note that when the Draft document was presented to Committee in October 2010, Framfield was proposed to have an allocation of 25 dwellings and a classification of Neighbourhood Centre. As such the Council considered its function to be: "A settlement with limited basic or no facilities but with access to another centre or a settlement with facilities but poor accessibility or access only to a service or local centre." 3.2.6 Our Representations therefore focus on the rationale for the Council's approach overall, and the validity of the change in status which occurred between October 2010 and February 2011. 3.3. Framfield 3.3.1 BP1 (Development of the Proposed Submission CoreStrategy Background paper) includes in its Appendices various information about individual settlements. The Council draws on that material in its assessment of growth potential in each settlement in Section 8 of BP1. 3.3.2. Appendix 4 (Settlement Facilities Matrix) includes information on all minor settlements in the District and concludes with an accessibility rating. Appendix 3 takes this material but adds what appears to be a subjective measure of "settlement self sufficiency" to determine the relative status of individual settlements. Decisions about how new development should be distributed are based on that assessment. 3.3.3. In our submission this is an incomplete and flawed approach. Indeed it omits to take into account other relevant considerations contained in BP1 itself. For example: a. Appendix 1 identifies the comments made by Parish Councils in response to the 2009 Spatial Development Options Consultation. Those views must carry some weight. In the case of Framfield for example there was a preference for 26 - 50 dwellings with 51 - 100 as "worst case". b. Appendix 2 identifies settlements with potentially available housing land, including Framfield. c. Section 8 of BP1 provides information on affordable housing needs but omits to consider those settlements which have not already been pre-selected as suitable for rural growth. 3.3.4 These are all material considerations to be taken into account in determining the appropriateness of a settlement to accommodate additional development. 3.3.5 The Council's approach to settlement classification as regards Framfield results in flawed conclusions in the following respects. a. Facilities - The Council's decision to down-grade Framfield at the end of 2010 was apparently based on the closure of an existing shop in Blackboys and a re-assessment of local bus services. The fact that Framfield has lost some of its facilities in recent times demonstrates the vulnerability of its future vitality. It may be difficult in the short-term to secure the re-opening of local shops etc., but additional population should at least arrest any further decline and may, in the longer-term, pave the way for additional services. That is the intention of Government policy (PPS3 para 38 and PPS7 para 4. b. Accessibility: the key distinction in the Council's settlement hierarchy between "other unclassified settlements" and "neighbourhood centres" is access to another settlement which does have facilities. Framfield is located approximately 2.25 kms to the east of Uckfield. The village therefore fulfils not only the role of a defined rural settlement but it also acts as a satellite to Uckfield, benefiting from its services, facilities and wider public transport options. In the main these are less than 3 kms. Away from the village. In the Draft version of the Core Strategy submitted to Committee in October 2010 Framfield was identified as a Neighbourhood Centre, consistent with these characteristics. The Council's decision to reclassify it in the published Pre-Submission Core Strategy ignores this consideration. c. Housing Need: the need for additional housing has consistently been recognised in Framfield District. The Council's Housing Needs Study of 2009 estimated a gross annual housing need in Framfield of 21 units. It noted furthermore that over the past five years members of some 47 households had had to move out of the Parish to find a suitable home. The percentage of households in need is broadly consistent with the District average, as is the ability to afford market
accommodation. A further indication of local housing need was contained in a survey carried out by Framfield Parish Council in 2006. This identified 69 households requiring alternative housing within the next five-year period. The effect of the Council's classification of Framfield is that there will be no opportunity to meet any of this housing need, contrary to the intention of the national policy set out in PPS3. Capacity: Appendix 2 of BP1 indicates that Framfield has the capacity for additional development. The Wealden SHLAA identifies a number of "potentially suitable sites". Excluding sites within Framfield Parish but on the edge of Uckfield, the SHLAA identified a total of 7 "potentially suitable" sites with a capacity for 717 dwellings. 3.2.6 An illustration of the potential benefits which a modest housing allocation could generate at Framfield is provided in the Appendix. 3.4 Conclusion 3.4.1 Our criticisms of the Council's settlement hierarchy focus specifically on Framfield. However the flaws identified in the assessment process may well be applicable in other cases. 3.4.2 National policy stresses the importance of making provision for housing in rural settlements to meet housing needs and to protect and enhance their vitality. In the context of Wealden District there is a well established precedent that this should take through a "balanced dispersal" strategy. 3.4.3. A modest amount of development in Framfield can make a valuable contribution to the vitality of the village as well as responding to meeting market and affordable housing needs. The village should be reinstated in the settlement hierarchy as a Neighbourhood Centre.

**Details of Changes to be Made:**
Framfield should be classified as a neighbourhood centre.

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**Details of Reasons for Soundness/ Legal Compliance:**
The Council states that the Core Strategy intends that a total of around 9,600 dwellings will be created in the period 2006 - 2040. This is made up as follows. Houses already built (to April 2010) 1331 Existing commitments 3558 Proposed Additional Housing 4685 Total 9579 2. paragraph 3.10 of the Ppoused Submission Core Strategy states that the Council expects the population of the district to increase between 2006 and 2030 by approximately 19,000 which represents 16,800 households. It is clear therefore that the number of new households likely to be created in the district over the plan period will be far in excess of the number of new dwellings planned. Even if all the new dwellings proposed are delivered this will only meet the needs of 57% of the expected new households. Well over 7,000 households will remain in housing need. 3. On this basis the Core Strategy is unsound because the numbers of dwellings proposed to be delivered does not properly reflect the expected housing need. A larger number of dwellings should be planned for in Policy WCS1 to address the shortfall in District-wide housing allocations. the total should be closer to the number of new households expected to be created over the plan period.

**Details of Changes to Be Made:**
The total number of dwellings to be provided should be increased, with significantly more housing development being identified in the north of the district where the market is stronger and a known need for housing exists.
We are intrigued by the Councils intended adoption of an unsound housing position. The Council’s proposals for the provision of housing development during the period 2006 – 2030 demonstrate that the Council’s Local Development Framework Document is not in conformity with the Regional Spatial Strategy, which forms part of the Development Plan. Paragraph 3.3 of the Council’s Background Paper no. 1 (BP1) states “Current legislation requires that the Core Strategy is in general conformity with the Regional Spatial Strategy, the South East Plan” (SEP), which was adopted in May 2009. In paragraph 3.3 of BP1, the Council also acknowledge that “The South East Plan requires that at least 11,000 dwellings is provided in Wealden District between 2006 and 2026”. The SEP (Policy H1) requires 11,000 new dwellings to be provided in Wealden District between 2006 and 2026, equal to an overall annual requirement of 550 per year. Paragraph 3.3 of the Council’s BP1 states “Because of existing planning permission and houses that have already been built since 2006, overall we need to find locations for a total of approximately 7,000 new houses between now and 2026”. Assuming 550 dwellings per year based on the SEP housing requirement, extending the PSCS DPD end date to 2030 (i.e. 4 more years) would require an additional 2,200 dwellings, bringing this total to the equivalent of 9,200 dwellings between 2006 and 2030. Policy WCS2 indicates that 4,889 dwellings are already committed (through planning permissions, commencements etc.) as at 1st April 2010. Set against the SEP requirement, this would leave a residual requirement for 6,111 dwellings up to 2026 (i.e. 11,000 minus 4,889) and if the SEP requirement were to be extended by 4 years up to 2030 (at 550 dwellings per year i.e. a total of 2,200 dwellings), this would create a total residual requirement of 8,311 additional dwellings by 2030. This residual requirement is the equivalent of 415 dwellings per annum during the remaining 20 year period between April 2010 and April 2030. By contrast, draft Policy WCS1 provides for a total provision of 9,600 dwellings between 2006 and 2030. Taking account of 4,889 dwelling commitments, this leaves only 4,685 new dwellings during the remaining 20 year period. This is the equivalent of only 230 dwellings per year (i.e. just over half that implied by extending the annual housing requirement set out in Policy H1 of the SEP to 2030). In draft Policy WCS2, the 9,600 dwelling figure referred to in draft Policy WCS1 has a total of 9,574 dwellings during the same 2006 – 2030 time period. The Council has not provided any justification for failing to comply with the housing requirements set out in SEP and no justification has been provided as to how the seemingly speculative figure of 9,600 dwellings or 9,574 dwellings has been arrived at for the housing requirement during the period 2006 – 2030 in draft Policies WSC1 and WSC2. As the council are aware there have been a number of recent announcements regarding the emerging Localism Bill and the changes being sought by the Government and we have looked to deal with these within our comments. As the Council is aware, Section 19 of the Planning and Compulsory Purchase Act 2004 (as amended) deals with the Preparation of local development documents. Section 19(2) specifically states that: “In preparing a Development Plan Document or any other local development document the local planning authority must have regard to (a) national policies and advice contained in guidance issued by the Secretary of State; (b) the RSS for the region in which the area of the authority is situated, if the area is outside Greater London”; (h) any other local development document which has been adopted by the authority”. The adopted South East Plan therefore remains part of the development plan and whatever the Council believes cannot be used as a reason for not complying with 19(2)(b) as this is a statutory requirement. This is particularly true bearing in mind recent appeal decisions, which confirm the status of the RSS’s and the limited weight that can be attributed at this time to the emerging Localism Bill. Accordingly any DPD that appears prior to enactment of the Localism Bill which materially departs from the RSS must be found unsound given that it would not comply with statute, particularly given the Governments recent announcement that an Environmental Assessment will now be carried out to consider the removal of the RSS’s. By any reasonable standard, this is likely to take a long period of time and it is therefore fair to assume the RSS’s will remain as part of the development plan for a good period to come. Nonetheless, even ignoring the above the Government remains committed to the delivery of more housing and it therefore seems perverse for the council to be attempting to adopt a strategy which seeks to reduce what should be recognised at the very least, as a minimum housing requirement. It is clear from all the above therefore that the RSS remains in law as part of the development plan and cannot be ignored, as the council appears to be seeking to do. We also refer the council back to the founding principles of the emerging local development framework. For example PPS 12 confirms that the Core Strategies; “4.36 Core strategies must be justifiable: they must be: • founded on a robust and credible evidence base; and • the most appropriate strategy when considered against the reasonable alternatives”. We question whether the council’s unjustified Housing Growth figures meet this simple test as presently emerging and we maintain therefore that the Councils emerging Core Strategy is not only deficient because it ignores the
adopted RSS, but it also not founded on the most up to date evidence base. Perhaps, however most importantly we draw the council’s attention to the evidence base it has at its disposal and indeed comments it makes in supporting documents for this Core Strategy. Paragraph 5.3 of the “Managing the Delivery of Housing Background Paper” – Background Paper 2 notes that “the Councils Housing Needs Assessment highlights the acute level of affordable housing need within the District and it is noted that the main means of achieving affordable housing delivery is by the means of the construction of market housing…” Paragraph 6.11 of the same document goes onto confirm that “on this basis, the assessment has identified an annual affordable housing need of 812 in Wealden”. On the basis that the delivery of affordable housing, as accepted by the Council is predicated on the delivery of market accommodation, the evidence supports a much higher level of growth than that envisaged by paragraphs 3.8 – 3.17 and more importantly policies WCS1 and WCS2 of the consultation document. Indeed, it is obvious from the above that a target of 4,685 new homes over the period 2006 – 2026 is neither robust or indeed accurate and would continue to exacerbate the ongoing chronic housing deficiencies in the district. Furthermore, paragraph 3.22 of BP1 is of course, wholly misleading as it compares housing target figures that relate to two different time periods. The 11,000 dwellings target relates to the housing requirement set out in SEP between the period 2006 and 2026 (i.e. equal to 550 dwellings per annum), whereas the Council’s reduced figure of 9,600 dwellings relates to an extended 4 year period between 2006 – 2030 which would be the equivalent of 400 dwellings per annum (i.e. a reduction of 150 dwellings per annum over the entire Plan period compared to the SEP). Thus, not only is the PSCS DPD not legally compliant in failing to be in accordance with the Development Plan (or its time period), but also it is not sound, as no satisfactory justification has been provided for the substantial reduction in the housing period and over an extended plan period. Moreover, no justification has been made as to why the council fails to take on board the evidence which clearly supports a higher housing provision than that proposed within the adopted RSS, particularly taking on board the Governments growth agenda.

Details of Changes to be Made:

We therefore suggest that the submitted Core strategy needs to be amended to take into the account the extant development plan, including the South East Plan’s housing target at the very least, but with a recognition for a higher level of growth should be planned for. At the very least therefore, there needs to be a larger degree of flexibility built into the document. Whilst the Council has within paragraphs 5.18 – 5.20, as well as policy WCS5 sought to provide a contingency within the document, this does not go far enough and needs to be far more robust to take account, as identified above of the chronic affordable housing issues that exist within the District.
We are intrigued by the Council’s intended adoption of an unsound housing position. The Council’s proposals for the provision of housing development during the period 2006 – 2030 demonstrate that the Council’s Local Development Framework Document is not in conformity with the Regional Spatial Strategy, which forms part of the Development Plan. Paragraph 3.3 of the Council’s Background Paper no. 1 (BP1) states “Current legislation requires that the Core Strategy is in general conformity with the Regional Spatial Strategy, the South East Plan” (SEP), which was adopted in May 2009. In paragraph 3.3 of BP1, the Council also acknowledge that “The South East Plan requires that at least 11,000 dwellings is provided in Wealden District between 2006 and 2026”. The SEP (Policy H1) requires 11,000 new dwellings to be provided in Wealden District between 2006 and 2026, equal to an overall annual requirement of 550 per year. 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Section 19(2) specifically states that: “In preparing a Development Plan Document or any other local development document the local planning authority must have regard to (a) national policies and advice contained in guidance issued by the Secretary of State; (b) the RSS for the region in which the area of the authority is situated, if the area is outside Greater London”; (h) any other local development document which has been adopted by the authority”. The adopted South East Plan therefore remains part of the development plan and whatever the Council believes cannot be used as a reason for not complying with 19(2)(b) as this is a statutory requirement. This is particularly true bearing in mind recent appeal decisions, which confirm the status of the RSS’s and the limited weight that can be attributed at this time to the emerging Localism Bill. Accordingly any DPD that appears prior to enactment of the Localism Bill which materially departs from the RSS must be found unsound given that it would not comply with statute, particularly given the Governments recent announcement that an Environmental Assessment will now be carried out to consider the removal of the RSS’s. By any reasonable standard, this is likely to take a long period of time and it is therefore fair to assume the RSS’s will remain as part of the development plan for a good period to come. Nonetheless, even ignoring the above the Government remains committed to the delivery of more housing and it therefore seems perverse for the council to be attempting to adopt a strategy which seeks to reduce what should be recognised at the very least, as a minimum housing requirement. It is clear from all the above therefore that the RSS remains in law as part of the development plan and cannot be ignored, as the council appears to be seeking to do. We also refer the council back to the founding principles of the emerging local development framework. For example PPS 12 confirms that the Core Strategies; “4.36 Core strategies must be justifiable: they must be: • founded on a robust and credible evidence base; and • the most appropriate strategy when considered against the reasonable alternatives”. We question whether the council’s unjustified Housing Growth figures meet this simple test as presently emerging and we maintain therefore that the Council’s emerging Core Strategy is not only deficient because it ignores the
adopted RSS, but it also not founded on the most up to date evidence base. Perhaps, however most importantly we draw the council’s attention to the evidence base it has at its disposal and indeed comments it makes in supporting documents for this Core Strategy. Paragraph 5.3 of the “Managing the Delivery of Housing Background Paper” – Background Paper 2 notes that “the Councils Housing Needs Assessment highlights the acute level of affordable housing need within the District and it is noted that the main means of achieving affordable housing delivery is by the means of the construction of market housing...” Paragraph 6.11 of the same document goes onto confirm that “on this basis, the assessment has identified an annual affordable housing need of 812 in Wealden”. On the basis that the delivery of affordable housing, as accepted by the Council is predicated on the delivery of market accommodation, the evidence supports a much higher level of growth than that envisaged by paragraphs 3.8 – 3.17 and more importantly policies WCS1 and WCS2 of the consultation document. Indeed, it is obvious from the above that a target of 4,685 new homes over the period 2006 – 2026 is neither robust or indeed accurate and would continue to exacerbate the ongoing chronic housing deficiencies in the district. Furthermore, paragraph 3.22 of BP1 is of course, wholly misleading as it compares housing target figures that relate to two different time periods. The 11,000 dwellings target relates to the housing requirement set out in SEP between the period 2006 and 2026 (i.e. equal to 550 dwellings per annum), whereas the Council’s reduced figure of 9,600 dwellings relates to an extended 4 year period between 2006 – 2030 which would be the equivalent of 400 dwellings per annum (i.e. a reduction of 150 dwellings per annum over the entire Plan period compared to the SEP). Thus, not only is the PSCS DPD not legally compliant in failing to be in accordance with the Development Plan (or its time period), but also it is not sound, as no satisfactory justification has been provided for the substantial reduction in the housing period and over an extended plan period. Moreover, no justification has been made as to why the council fails to take on board the evidence which clearly supports a higher level of growth than that proposed within the adopted RSS, particularly taking on board the Governments growth agenda.

Details of Changes to be Made:
We therefore suggest that the submitted Core strategy needs to be amended to take into the account the extant development plan, including the South East Plan’s housing target at the very least, but with a recognition for a higher level of growth should be planned for. At the very least therefore, there needs to be a larger degree of flexibility built into the document. Whilst the Council has within paragraphs 5.18 – 5.20, as well as policy WCS5 sought to provide a contingency within the document, this does not go far enough and needs to be far more robust to take account, as identified above of the chronic affordable housing issues that exist within the District.

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**Sound**
- Yes
- No
- ✅ Justified
- ✅ Effective
- ✅ Consistent with national policy

**Legally Compliant**
- ✅ Yes
- No

**Details of Reasons for Soundness/ Legal Compliance:**
1.1 The Council states that the Core Strategy intends that a total of around 9,600 dwellings will be created in the period 2006 - 2040. This is made up as follows. Houses already built (to April 2010) 1331 Existing commitments 3558 Proposed Additional Housing 4685 Total 9579 1.2 paragraph 3.10 of the Proposed Submission Core Strategy states that the Council expects the population of the district to increase between 2006 and 2030 by approximately 19,000 which represents 16,800 households. It is clear therefore that the number of new households likely to be created in the district over the plan period will be far in excess of the number of new dwellings planned. Even if all the new dwellings proposed are delivered this will only meet the needs of 57% of the expected new households. Well over 7,000 households will remain in housing need.

**Details of Changes to be Made:**
On this basis the Core Strategy is unsound because the numbers of dwellings proposed to be deliverd does not properly reflect the expected housing need. A larger number of dwellings should be planned for in Policy WCS1 to redress the shortfall in District-wide housing allocations. the total should be closer to the number of new households expected to be created over the plan period.
Details of Reasons for Soundess/ Legal Complaince:

1. The Council states that the Core Strategy intends that a total of around 9,600 dwellings will be created in the period 2006 - 2030. This is made up as follows: Houses already built (to April 2010) 1331 Existing commitments 3558 Proposed additional housing 4685 TOTAL 9579 2. Paragraph 3.10 of the Proposed Submission Core Strategy states that the Council expects the population of the District to increase between 2006 and 2030 by approximately 19,600, which represents 16,800 households. It is clear therefore that the number of new households likely to be created in the district over the plan period will be far in excess of the number of dwellings planned. Even if all of the new dwellings proposed are delivered this will only meet the needs of 57% of the expected new households. Well over 7,000 households will remain in housing need. Due to the size of additional appendices they have not been uploaded but are available to view at the Council's offices.

Details of Changes to be Made:

3. On this basis the Core Strategy is unsound because the numbers of dwellings that are proposed to be delivered are deficient and do not properly reflect the expected housing need. A larger number of dwellings should therefore be planned for in Policy WCS1 to redress the shortfall in District-wide housing allocations.

Details of Reasons for Soundess/ Legal Complaince:

1. The Council states that the Core Strategy intends that a total of around 9,600 dwellings will be created in the period 2006 to 2030. This is made up as follows: Houses already built (to April 2010) 1331 Existing commitments 3558 Proposed additional housing 4685 TOTAL 9579 2. Paragraph 3.10 of the Proposed Submission Core Strategy states that the Council expects the population of the District to increase between 2006 and 2030 by approximately 19,000, which represents 16,800 households. It is clear therefore that the number of new households likely to be created in the district over the plan period will be far in excess of the number of new dwellings planned. Even if all of the new dwellings proposed are delivered this will only meet the needs of 57% of the expected new households. Well over 7,000 households will remain in housing need. Due to the size of additional appendices they have not been uploaded but are available to view at the Council's offices.

Details of Changes to be Made:

3. On this basis the Core Strategy is unsound because the numbers of dwellings that are proposed to be delivered are deficient and do not properly reflect the expected housing need. A larger number of dwellings should therefore be planned for in Policy WCS1 to redress the shortfall in District-wide housing allocations.

Details of Reasons for Soundess/ Legal Complaince:

1. The Council states that the Core Strategy intends that a total of around 9,600 dwellings will be created in the period 2006 to 2030. This is made up as follows: Houses already built (to April 2010) 1331 Existing commitments 3558 Proposed additional housing 4685 TOTAL 9579 2. Paragraph 3.10 of the Proposed Submission Core Strategy states that the Council expects the population of the District to increase between 2006 and 2030 by approximately 19,000, which represents 16,800 households. It is clear therefore that the number of new households likely to be created in the district over the plan period will be far in excess of the number of new dwellings planned. Even if all of the new dwellings proposed are delivered this will only meet the needs of 57% of the expected new households. Well over 7,000 households will remain in housing need. Due to the size of additional appendices they have not been uploaded but are available to view at the Council's offices.

Details of Changes to be Made:

3. On this basis the Core Strategy is unsound because the numbers of dwellings that are proposed to be delivered are deficient and do not properly reflect the expected housing need. A larger number of dwellings should therefore be planned for in Policy WCS1 to redress the shortfall in District-wide housing allocations. The total should be closer to the number of new households expected to be created over the plan period.

Details of Changes to be Made:

The total number of dwellings to be provided should be increased, with significantly more housing development being identified in the north of the District where the market is stronger and a known need for housing exists.
Details of Reasons for Soundness/ Legal Compliance:
The Number of Dwelling Proposed to be delivered. (Paragraphs 3.8 – 3.17, Policy WCS1) 1 The Council states that the Core Strategy intends that a total of around 9,600 dwellings will be created in the period 2006 to 2030. This is made up as follows: Houses already build (to April 2010) 1331 Existing commitments 3558 Proposed Additional Housing 4685 Total 9579

Details of Changes to be Made:
2 Paragraph 3.10 of the Proposed Submission Core Strategy states that the Council expects the population of the District to increase between 2006 and 2030 by approximately 19,000, which represents 16,800 households. It is clear therefore that the number of new households likely to be created in the district over the plan period will be far in excess of the number of new dwellings planned. Even if all of the new dwellings proposed are delivered this will only meet the needs of 57% of the expected new households. Well over 7,000 households will remain in housing need.

Details of Reasons for Soundness/ Legal Compliance:
We are concerned that under present proposals the essential housing needs for market and affordable housing will not be met. 3.10 Trend based projections show demand for market and affordable housing is high “and in excess of what Wealden could accommodate or deliver” 3.11 Confusingly it goes on to meet this need in urban extensions at Heathfield, Uckfield, Hailsham, Polegate, Willingdon, Stone Cross and Frant.

Details of Changes to be Made:
Paragraph 3.1
Details of Reasons for Soundess/ Legal Complaince:
"Supplementary documents have been submitted but not attached, and may be viewed at the Council offices on request". Paragraph 3.10 Fails to acknowledge the true need for new housing during the plan period and in particular affordable housing which is not as a result of migration and which can only be delivered by the building of market housing. The Council has no delivery mechanism for affordable housing other than through the requirement of a % of the housing allocations being delivered by developers as affordable housing. there is no evidence that the trend based requirement cannot be delivered in Walden with any insurmountable environmental impacts or infrastructure delivery failure. the SHLAA has identified that 22,000 dwellings can be delivered in the plan period.

Details of Changes to be Made:
REVISION SOUGHT. Delete second sentence and revise third sentence as follows; "To meet this need the Strategic Housing Land Available Assessment has identified a number of individual sites where housing amounting to some 22,000 dwellings would be suitable, available and achievable.

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Paragraph 3.11
Details of Reasons for Soundess/ Legal Complaince:
The Councils figure of 9600 over the period 2006 -2030 acquates to 400 dwellings per annum inconsistant with RSS evidence based figures of 550 between 2006-2026 ie 11000 dwellings over 20 years. Under this analysis over the 24 year period based on the RSS thefigure would be 13200. Therefore cuurently the Council is proposing a reduction on the RSS figure of 3600 or 37.5% of the Council housing farget of 9600.

Details of Changes to be Made:
The Council need to relate its figures to a regional figure to make sense of the population matrix and must reionstate the RSS figure for Wealden as the starting calculation for housing requirement for its district. It must refer to the Councils Strategic Housing Marketing Assessment, SHLAA capacity Housing Needs and Census.
Details of Reasons for Soundness/ Legal Complaince:
The Council fig of 9600 over the 2006 -2030 amounts to 400 dwellings per annum in consistant with the RSS evidence based figs of 550 between the period of 2006 -2026 ie 11000 dwellings over 20 yrs. Under this analysis over the 24 yr period based on RSS figures would amount to 13200 dwellings. Therefore currently the Council is proposing a reduction on the RSS figs of 3600 or 37.5% of the Councils current target figure.

Details of Changes to be Made:
The Council need to relate its fig to Regional figures to make sense of the strategic importance of the district meeting its regional targets. Consideration must be given to the population matrix and must re instate the RSS figure for Wealden as the starting point for its housing requirements. It must refer to the Councils Strategic Housing Marketing Assessment, SHLAA capacity housing needs and Census predictions.

Details of Reasons for Soundness/ Legal Complaince:
WJPC is concerned at the numerous references to Polegate and Willingdon as one settlement, as highlighted in 3.3 Table 1, 3.11, SPO6, WCS2, WCS3, 5.13, 6.31(2), Figure 8 and Figure 12. In particular, Figure 2 showing settlement hierarchy, places Polegate and Willingdon as one settlement, yet details other settlements individually.

Details of Changes to be Made:
Paragraph 3.11

Details of Reasons for Soundness/ Legal Complaince:

The Council states that the Core Strategy intends that a total of around 9,600 dwellings will be created in the period 2006 - 2040. This is made up as follows. Houses already built (to April 2010) 1331 Existing commitments 3558 Proposed Additional Housing 4685 Total 9579 2. paragraph 3.10 of the Porposed Submission Core Strategy states that the Council expects the population of the district to increase between 2006 and 2030 by approximately 19,000 which represents 16,800 households. It is clear therefore that the number of new households likely to be created in the district over the plan period will be far in excess of the number of new dwellings planned. Even if all the new dwellings proposed are delivered this will only meet the needs of 57% of the expected new households. Well over 7,000 households will remain in housing need. 3. On this basis the Core Strategy is unsound because the numbers of dwellings proposed to be deliverd does not properly reflect the expected housing need. A larger number of dwellings should be planned for in Policy WCS1 to reddress the shortfall in District-wide housing allocations. the total should be closer to the number of new households expected to be created over the plan period.

Details of Changes to be Made:

The total number of dwellings to be provided should be increased, with significantly more housing development being identified in the north of the district where the market is stronger and a known need for housing exists.
1.1 The Amount of New Housing – Policy WCS1 and WCS2 and paragraphs 5.3 etc 1.1.1 We note that the proposed Submission Core Strategy looks to accommodate 9574 new dwellings in the district across the plan period (2006 – 2030) i.e. 399 a year. This is circa 27.5% less than the 11,000 dwellings proposed across the district in the South East Plan (SEP) (May 2009) for the period 2006 and 2026. 1.1.2 PPS12 requires Core Strategies to conform generally to the regional policy. We do not consider the amount of new housing proposed in the district to be legally compliant as it is not consistent with regional policy as set out in the SEP. 1.1.3 Whilst the LPA appears to be progressing with a lower level of growth on the assumption that the SEP will be revoked by the time the Core Strategy gets to examination, the fact is the SEP remains part of the development plan at present and the CS should have regard to the aims and objectives of the SEP/ justify why it is necessary and appropriate to depart from it. The proposed Submission Core Strategy contains no such justification. 1.1.4 A detailed understanding of the background to the amount of new housing proposed in the district in the SEP is important in considering the soundness of the housing land supply strategy now being advocated in the proposed Submission Core Strategy document. 1.1.15 The Chief Planning Officer (CPO) in his letter of the 6th July made it clear that in the context of the revocation of the RSS LPAs would be responsible for determining the housing numbers in the absence of a regional target, and that the housing numbers promoted by LPAs would need to be justified, as LPAs would need to defend them through the LDF examination process. 1.1.19 The District Council has an obligation to assess and provide for the housing needs and demands of the District. Paragraph 33 of PPS3 makes it very clear that in determining local levels of housing provision local planning authorities should, in preparing their Core Strategies take into account evidence of current and future levels of housing need and demand, e.g. as set out in Housing Market Assessment and the Housing Needs Assessment. 1.1.22 Having regard to the above we feel the DC should give consideration to the accommodation of at least 13,200 (i.e. the 11,000 set out in the SEP plus 4 x 550) to cover the additional years to 2030). Given the 4,889 units are already committed this would leave a residual requirement of 8,311 i.e. a residual requirement equivalent to 415 dwellings pa. If, 75% of the 13,200 units were on sites that generated an affordable housing need under the new policy WCS8, this level of provision could provide for circa 3,465 affordable dwellings i.e. 18% of the affordable need identified in the HNA. Which demonstrates how sever the need is relative to the supply 1.1.23 WDC’s aversion to higher housing numbers appears to be related to the effect these could have on infrastructure and services, especially in the southern part of the district. However, it is often the case that the strategic housing allocations help to address this issue, providing new transport links/highway improvements, contributing to new sustainable drainage facilities, new schools, medical facilities etc. Higher levels of growth need not prejudice existing infrastructure and services; they could in fact help address existing problems. 1.2 Housing Distribution 1.2.1 We do not consider the housing distribution strategy to be legally compliant. It is not consistent with regional policy as set out in the SEP. PPS12 requires Core Strategies to conform generally to the regional policy. Paragraph 4.33 states that choices to be made on where growth should take place should follow national and regional policy. 1.2.2 The southern part of Wealden district is located within the Sussex Coast Sub Region, one of the nine sub regions identified in the SEP. These sub regions were to be ‘the focus for growth and regeneration’. Policy SP1 of the SEP refers 1.2.3 Policy H1 of the SEP deals with regional housing provision. It stipulates that in the Sussex Coast Sub Region, 69,300 net additional dwellings should be provided between 2006 and 2026. 1.2.4 Policy SCT5 of the SEP sets out the scale and distribution of housing across the Sussex Coast sub region. It indicates that that part of Wealden District which falls within the Sussex Coast Sub Region should seek to accommodate 7000 dwellings during the plan period (2006 – 2026) i.e. 350 dwellings per annum. 1.2.5 Given the above, and having regard to the requirements of policy H1b of the SEP (wherein WDC are required to provide some 11,000 units across the district during the plan period (2006-2026)), it is clear that the SEP looks to focus growth within that part of the district that falls within the Sussex Coast Sub Region, with only a small proportion of development (4000 homes) to be accommodated within what was called the Rest of the District. 1.2.6 The SEP also makes it clear that the Sussex Coast Sub Region was identified as an area where the government was looking to proactively pursue and promote economic growth and regeneration. As a result over 60% of WDC’s housing requirement was located within the Sussex Coast Sub Region. The spatial strategy being promoted in the proposed Submission Core Strategy document is, according to paragraph 5.5. of the proposed Submission Core 493/A3/JA April 2011 Strategy document, predicated upon the strategy objectives and the settlement hierarchy. Thus only circa 51% of the proposed level of housing growth is to be located within what was referred to as the Sussex Coast Sub Region in the SEP. 1.2.7 Not only is the spatial strategy inconsistent with the SEP, but it fails to take on board the reason for
the spatial strategy proposed in the SEP i.e. the economic regeneration of the Sussex coastal area. WDC have, in their sustainability appraisal of the proposed Submission Core Strategy Document failed to assess the implications of the spatial strategy advocated in the proposed Submission Core Strategy Document on the economic regeneration of the Sussex coastal area. The council’s failure to undertake this work means that the proposed Submission Core Strategy Document is not soundly based. 1.2.9 In promoting an annual housing requirement of just 400 units WDC, in their proposed Submission Core Strategy document, are in our opinion actively stifling economic growth. Furthermore, the council’s decision to treat the whole district as a single entity, with no emphasis placed on the regeneration of the Sussex Coast Sub Region, is in our opinion, despite the aspirations of policies SP03, 04 and 06, actively prejudicing the economic regeneration of the coastal area, to the detriment of the wider area. 1.2.11 As currently drafted the housing distribution strategy advocated by WDC in their Proposed Submission Core Strategy is not in ‘general conformity’ with the RSS as required by Paragraph 4.2 and 4.33 of PPS12 and is not therefore sound.

Details of Changes to be Made:

3.1 The Amount of New Housing:- 3.1.1 We feel the housing targets set out in policy WCS1 should having regard to our position on the scale of housing growth be amended from 9600 to 13,200 dwellings. 3.1.2 Similarly we feel the housing targets set out in policy WCS2 of the CS should, having regard to our position on the scale of housing growth, the spatial strategy, and the level of housing proposed in Stone Cross specifically, be amended thus:- WCS2 Distribution of Housing Growth 2006 – 2030 Town/ settlement Stone Cross and Westham 42 Built or already committed - 980 New allocations; total dwellings 2006 - 2030 1,022. Total Wealden 4,889 Built or already committed; 8,311 new allocations; 13,200 Total Dwellings 2006 - 2030. 3.1.3 We would also suggest that the number of new allocations is revised to ensure that 60% of the proposed growth is located in the Sussex Coast Sub Region, as per the SEP, which should be identified on a plan. 3.1.4 Having regard to the above there would also be a need to amend policy SPO3 to address the increase in housing supply we advocate, and the reinstatement of the Sussex Coast Sub Region. Similarly paragraphs 3.11 and 3.16 would need to be revised to reflect our position, with the economic policies (SPO6 and WSC3 reviewed accordingly). 3.1.5 If the scale of housing proposed during the plan period is not revised as recommended, we would suggest that policy WCS2 is revised thus:- WCS2 Distribution of Housing Growth 2006 – 2030 Town/ settlement Stone Cross and Westham 42 Built or already committed - 850 New allocations; total dwellings 2006 - 2030 892. Total Wealden 4,889 Built or already committed; 4,835 new allocations; 9,724 Total Dwellings 2006 - 2030. 3.1.6 Given our recommended changes to the scale of growth proposed at Stone Cross and Westham we would also recommend that paragraph 6.31 (3) and paragraph 6.31 (3 bullet points 3, and 4 be amended thus:- ‘allocating a range of deliverable housing sites for up to 700 dwellings, and leisure, recreation and community facilities in Polegate and Willingdon, around 850 dwellings in Stone Cross, with some 16,890 sq. metres employment floorspace in the Polegate and Willingdon area. Sites for development will be identified and phased through the Site Allocation DPDs including: · provision of around 550 homes within an extension to the urban area of Stone Cross to the east and south east (SD6), with flexibility between SD6 and SD7, subject to highway improvements; · provision of around 300 homes within an extension to the urban area of Stone Cross to the north (SD7), with flexibility between SD6 and SD7, subject to highway improvements’
Paragraph 3.11

Details of Reasons for Soundess/ Legal Complaince:
Generally support the strategy with the exception of including Stone Cross as a location for sustainable new development. Stone Cross as a matter of fact finding cannot be considered to be a service centre or a sustainable location for new development given the paucity of local facilities and its reliance on surrounding towns to provide for its needs. In no rational and reasonable analysis can Stone Cross be considered to provide a range of jobs, services and facilities.... This is a matter wherein I have found the Background Papers and supporting documentation to be misleading and rather than rely on the Sustainability Appraisal I would urge the Inspector to visit the settlements and assess whether Stone Cross falls within the classification of a Service Centre and contrast it with say Polegate

Details of Changes to be Made:
Amend 3.11 to read: To ensure maximum sustainability, east of access to services and to reduce the carbon footprint of development most of our growth is proposed in the form of sustainable urban extensions. In order to improve the performance of our economy, regenerate our market towns and meet housing needs 4230 additional dwellings have been identified as urban extensions or infill in Heathfield, Uckfield, Hailsham, Polegate and Willingdon and adjacent to the boundary with Tunbridge Wells in the Parish or Frant.
Details of Reasons for Soundness/ Legal Compliance:

The justification for changing the target number of dwellings for the 2006-2030 is not robust. The dismissal of the Office of National Statistics projected population and household on the basis that the trend is attributed to inward migration and therefore not a Wealden problem is unreasonable. Wealden is not an island with border controls. The Core Strategy must take due account of the clear trend projection of 16,800 additional households between 2006 - 2030. The arbitrary reduction of this trend to a figure of 9,600 based on consultation with Parish Councils and other parties who are seeking to reduce housing provisions is not the correct methodology to prepare the Core Strategy. A reduction of 42.8% on the trend projections must be fully justified. The adopted South East Plan, May 2009 examined the constraints on Wealden and the projected housing requirements and come to the conclusion that the District should accommodate an additional 11,000 dwellings within the shorter period of 2006-2027 (14,800 - 11,000) = 3,800 households, this reflecting the constrains on the district. This being a 25.7% reduction on the trend. On this basis the figure for the district for the period 2006 - 2030 should be 16,800 - 25% (16,800 - 4,318) = 12,482 (say 12,500). Not the 9,600 proposed in the Core Strategy. A figure of 12,500 households over the 24 years of the plan represents an average annual provision of 520 dwellings per year. An additional 120 dwellings pa over the 400 proposed in the proposed submission Core Strategy is not such an unreasonable figure in view of the scale of the alterations proposed and the time scale of the plan allowance in the market to recover from its current low level. A high figure for housing provision also has the advantage of creating more revenue in the form of S106 Planning Agreement funds or by way of the Community Infrastructure Levy to fund the related infrastructure. This relates particularly to the big cost items such as bypasses and improvements to water treatment works.

Details of Changes to be Made:

In the light of this submission we would like to see SP03 re written as follows: To meet the needs of the population of Wealden and for Wealden to meet its role in providing housing in the South East of England, which protection the environment, the Core Strategy will seek to provide 2,500 between 2006 and 2030. The delivery of these homes will be dependent on the delivery of developable sites and market conditions. Over the whole of the 24 plans the average provision of 520 dwellings per year will be sort and monitored. The provision of social and physical infrastructure will be as far as possible provided in conjunction with the development proposed. Funding for such provision will be sent from all sources including the housing development itself. The of the development shall be in accord with the Spatial Strategy of the...
Details of Reasons for Soundness/Legal Compliance:

1.1 The Council states that the Core Strategy intends that a total of around 9,600 dwellings will be created in the period 2006 - 2040. This is made up as follows. Houses already built (to April 2010) 1331 Existing commitments 3558 Proposed Additional Housing 4685 Total 9579 1.2 paragraph 3.10 of the Proposed Submission Core Strategy states that the Council expects the population of the district to increase between 2006 and 2030 by approximately 19,000 which represents 16,800 households. It is clear therefore that the number of new households likely to be created in the district over the plan period will be far in excess of the number of new dwellings planned. Even if all the new dwellings proposed are delivered this will only meet the needs of 57% of the expected new households. Well over 7,000 households will remain in housing need.

Details of Changes to be Made:
On this basis the Core Strategy is unsound because the numbers of dwellings proposed to be delivered does not properly reflect the expected housing need. A larger number of dwellings should be planned for in Policy WCS1 to redress the shortfall in District-wide housing allocations. the total should be closer to the number of new households expected to be created over the plan period.
We are intrigued by the Council’s intended adoption of an unsound housing position. The Council’s proposals for the provision of housing development during the period 2006 – 2030 demonstrate that the Council’s Local Development Framework Document is not in conformity with the Regional Spatial Strategy, which forms part of the Development Plan. Paragraph 3.3 of the Council’s Background Paper no.1 (BP1) states “Current legislation requires that the Core Strategy is in general conformity with the Regional Spatial Strategy, the South East Plan” (SEP), which was adopted in May 2009. In paragraph 3.3 of BP1, the Council also acknowledge that “The South East Plan requires that at least 11,000 dwellings is provided in Wealden District between 2006 and 2026”. The SEP (Policy H1) requires 11,000 new dwellings to be provided in Wealden District between 2006 and 2026, equal to an overall annual requirement of 550 per year. Paragraph 3.3 of the Council’s BP1 states “Because of existing planning permissions and houses that have already been built since 2006, overall we need to find locations for a total of approximately 7,000 new houses between now and 2026”. Assuming 550 dwellings per year based on the SEP housing requirement, extending the PSCS DPD end date to 2030 (i.e. 4 more years) would require an additional 2,200 dwellings, bringing this total to the equivalent of 9,200 dwellings between 2006 and 2030. Policy WCS2 indicates that 4,889 dwellings are already committed (through planning permissions, commencements etc.) as at 1st April 2010. Set against the SEP requirement, this would leave a residual requirement for 6,111 dwellings up to 2026 (i.e. 11,000 minus 4,889) and if the SEP requirement were to be extended by 4 years up to 2030 (at 550 dwellings per year i.e. a total of 2,200 dwellings), this would create a total residual requirement of 8,311 additional dwellings by 2030. This residual requirement is the equivalent of 415 dwellings per annum during the remaining 20 year period between April 2010 and April 2030. By contrast, draft Policy WCS1 provides for a total provision of 9,600 dwellings between 2006 and 2030. Taking account of 4,889 dwelling commitments, this leaves only 4,711 new dwellings during the remaining 20 year period. This is the equivalent of only 230 dwellings per year (i.e. just over half that implied by extending the annual housing requirement set out in Policy H1 of the SEP to 2030). In draft Policy WCS2, the 9,600 dwelling figure referred to in draft Policy WCS1 has a total of 9,574 dwellings during the same 2006 – 2030 time period. The Council has not provided any justification for failing to comply with the housing requirements set out in SEP and no justification has been provided as to how the seemingly speculative figure of 9,600 dwellings or 9,574 dwellings has been arrived at for the housing requirement during the period 2006 – 2030 in draft Policies WSC1 and WSC2. As the council are aware there have been a number of recent announcements regarding the emerging Localism Bill and the changes being sought by the Government and we have looked to deal with these within our comments. As the Council is aware, Section 19 of the Planning and Compulsory Purchase Act 2004 (as amended) deals with the Preparation of local development documents. Section 19(2) specifically states that: “In preparing a Development Plan Document or any other local development document the local planning authority must have regard to (a) national policies and advice contained in guidance issued by the Secretary of State; (b) the RSS for the region in which the area of the authority is situated, if the area is outside Greater London”; (h) any other local development document which has been adopted by the authority”. The adopted South East Plan therefore remains part of the development plan and whatever the Council believes cannot be used as a reason for not complying with 19(2)(b) as this is a statutory requirement. This is particularly true bearing in mind recent appeal decisions, which confirm the status of the RSS’s and the limited weight that can be attributed at this time to the emerging Localism Bill. Accordingly any DPD that appears prior to enactment of the Localism Bill which materially departs from the RSS must be found unsound given that it would not comply with statute, particularly given the Governments recent announcement that an Environmental Assessment will now be carried out to consider the removal of the RSS’s. By any reasonable standard, this is likely to take a long period of time and it is therefore fair to assume the RSS’s will remain as part of the development plan for a good period to come. Nonetheless, even ignoring the above the Government remains committed to the delivery of more housing and it therefore seems perverse for the council to be attempting to adopt a strategy which seeks to reduce what should be recognised at the very least, as a minimum housing requirement. It is clear from all the above therefore that the RSS remains in law as part of the development plan and cannot be ignored, as the council appears to be seeking to do. We also refer the council back to the founding principles of the emerging local development framework. For example PPS 12 confirms that the Core Strategies; “4.36 Core strategies must be justifiable: they must be: • founded on a robust and credible evidence base; and • the most appropriate strategy when considered against the reasonable alternatives”. We question whether the council’s unjustified Housing Growth figures meet this simple test as presently emerging and we maintain therefore that the Councils emerging Core Strategy is not only deficient because it ignores the
adopted RSS, but it also not founded on the most up to date evidence base. Perhaps, however most importantly we draw the council’s attention to the evidence base it has at its disposal and indeed comments it makes in supporting documents for this Core Strategy. Paragraph 5.3 of the “Managing the Delivery of Housing Background Paper” – Background Paper 2 notes that “the Councils Housing Needs Assessment highlights the acute level of affordable housing need within the District and it is noted that the main means of achieving affordable housing delivery is by the means of the construction of market housing...” Paragraph 6.11 of the same document goes onto confirm that “on this basis, the assessment has identified an annual affordable housing need of 812 in Wealden”. On the basis that the delivery of affordable housing, as accepted by the Council is predicated on the delivery of market accommodation, the evidence supports a much higher level of growth than that envisaged by paragraphs 3.8 – 3.17 and more importantly policies WCS1 and WCS2 of the consultation document. Indeed, it is obvious from the above that a target of 4,685 new homes over the period 2006 – 2026 is neither robust or indeed accurate and would continue to exacerbate the ongoing chronic housing deficiencies in the district. Furthermore, paragraph 3.22 of BP1 is of course, wholly misleading as it compares housing target figures that relate to two different time periods. The 11,000 dwellings target relates to the housing requirement set out in SEP between the period 2006 and 2026 (i.e. equal to 550 dwellings per annum), whereas the Council’s reduced figure of 9,600 dwellings relates to an extended 4 year period between 2006 – 2030 which would be the equivalent of 400 dwellings per annum (i.e. a reduction of 150 dwellings per annum over the entire Plan period compared to the SEP). Thus, not only is the PSCS DPD not legally compliant in failing to be in accordance with the Development Plan (or its time period), but also it is not sound, as no satisfactory justification has been provided for the substantial reduction in the housing period and over an extended plan period. Moreover, no justification has been made as to why the council fails to take on board the evidence which clearly supports a higher housing provision than that proposed within the adopted RSS, particularly taking on board the Governments growth agenda.

**Details of Changes to be Made:**

We therefore suggest that the submitted Core strategy needs to be amended to take into the account the extant development plan, including the South East Plan’s housing target at the very least, but with a recognition for a higher level of growth should be planned for. At the very least therefore, there needs to be a larger degree of flexibility built into the document. Whilst the Council has within paragraphs 5.18 – 5.20, as well as policy WCS5 sought to provide a contingency within the document, this does not go far enough and needs to be far more robust to take account, as indentified above of the chronic affordable housing issues that exist within the District.
We are intrigued by the Council's intended adoption of an unsound housing position. The Council's proposals for the provision of housing development during the period 2006 – 2030 demonstrate that the Council's Local Development Framework Document is not in conformity with the Regional Spatial Strategy, which forms part of the Development Plan. Paragraph 3.3 of the Council's Background Paper no. 1 (BP1) states “Current legislation requires that the Core Strategy is in general conformity with the Regional Spatial Strategy, the South East Plan” (SEP), which was adopted in May 2009. In paragraph 3.3 of BP1, the Council also acknowledge that “The South East Plan requires that at least 11,000 dwellings is provided in Wealden District between 2006 and 2026”. The SEP (Policy H1) requires 11,000 new dwellings to be provided in Wealden District between 2006 and 2026, equal to an overall annual requirement of 550 per year. Paragraph 3.3 of the Council's BP1 states “Because of existing planning permissions and houses that have already been built since 2006, overall we need to find locations for a total of approximately 7,000 new houses between now and 2026”. Assuming 550 dwellings per year based on the SEP housing requirement, extending the PSCS DPD end date to 2030 (i.e. 4 more years) would require an additional 2,200 dwellings, bringing this total to the equivalent of 9,200 dwellings between 2006 and 2030. Policy WCS2 indicates that 4,889 dwellings are already committed (through planning permissions, commencements etc.) as at 1st April 2010. Set against the SEP requirement, this would leave a residual requirement for 6,111 dwellings up to 2026 (i.e. 11,000 minus 4,889) and if the SEP requirement were to be extended by 4 years up to 2030 (at 550 dwellings per year i.e. a total of 2,200 dwellings), this would create a total residual requirement of 8,311 additional dwellings by 2030. This residual requirement is the equivalent of 415 dwellings per annum during the remaining 20 year period between April 2010 and April 2030. By contrast, draft Policy WCS1 provides for a total provision of 9,600 dwellings between 2006 and 2030. Taking account of 4,889 dwelling commitments, this leaves only 4,685 new dwellings during the remaining 20 year period. This is the equivalent of only 230 dwellings per year (i.e. just over half that implied by extending the annual housing requirement set out in Policy H1 of the SEP to 2030). In draft Policy WCS2, the 9,600 dwelling figure referred to in draft Policy WCS1 has a total of 9,574 dwellings during the same 2006 – 2030 time period. The Council has not provided any justification for failing to comply with the housing requirements set out in SEP and no justification has been provided as to how the seemingly speculative figure of 9,600 dwellings or 9,574 dwellings has been arrived at for the housing requirement during the period 2006 – 2030 in draft Policies WSC1 and WSC2. As the council are aware there have been a number of recent announcements regarding the emerging Localism Bill and the changes being sought by the Government and we have looked to deal with these within our comments. As the Council is aware, Section 19 of the Planning and Compulsory Purchase Act 2004 (as amended) deals with the Preparation of local development documents. Section 19(2) specifically states that: “In preparing a Development Plan Document or any other local development document the local planning authority must have regard to (a) national policies and advice contained in guidance issued by the Secretary of State; (b) the RSS for the region in which the area of the authority is situated, if the area is outside Greater London”; (h) any other local development document which has been adopted by the authority”. The adopted South East Plan therefore remains part of the development plan and whatever the Council believes cannot be used as a reason for not complying with 19(2)(b) as this is a statutory requirement. This is particularly true bearing in mind recent appeal decisions, which confirm the status of the RSS’s and the limited weight that can be attributed at this time to the emerging Localism Bill. Accordingly any DPD that appears prior to enactment of the Localism Bill which materially departs from the RSS must be found unsound given that it would not comply with statute, particularly given the Governments recent announcement that an Environmental Assessment will now be carried out to consider the removal of the RSS’s. By any reasonable standard, this is likely to take a long period of time and it is therefore fair to assume the RSS’s will remain as part of the development plan for a good period to come. Nonetheless, even ignoring the above the Government remains committed to the delivery of more housing and it therefore seems perverse for the council to be attempting to adopt a strategy which seeks to reduce what should be recognised at the very least, as a minimum housing requirement. It is clear from all the above therefore that the RSS remains in law as part of the development plan and cannot be ignored, as the council appears to be seeking to do. We also refer the council back to the founding principles of the emerging local development framework. For example PPS 12 confirms that the Core Strategies; “4.36 Core strategies must be justifiable: they must be: • founded on a robust and credible evidence base; and • the most appropriate strategy when considered against the reasonable alternatives”. We question whether the council’s unjustified Housing Growth figures meet this simple test as presently emerging and we maintain therefore that the Councils emerging Core Strategy is not only deficient because it ignores the
adopted RSS, but it also not founded on the most up to date evidence base. Perhaps, however most importantly we draw the council’s attention to the evidence base it has at its disposal and indeed comments it makes in supporting documents for this Core Strategy. Paragraph 5.3 of the “Managing the Delivery of Housing Background Paper” – Background Paper 2 notes that “the Councils Housing Needs Assessment highlights the acute level of affordable housing need within the District and it is noted that the main means of achieving affordable housing delivery is by the means of the construction of market housing...” Paragraph 6.11 of the same document goes onto confirm that “on this basis, the assessment has identified an annual affordable housing need of 812 in Wealden”. On the basis that the delivery of affordable housing, as accepted by the Council is predicated on the delivery of market accommodation, the evidence supports a much higher level of growth than that envisaged by paragraphs 3.8 – 3.17 and more importantly policies WCS1 and WCS2 of the consultation document. Indeed, it is obvious from the above that a target of 4,685 new homes over the period 2006 – 2026 is neither robust or indeed accurate and would continue to exacerbate the ongoing chronic housing deficiencies in the district. Furthermore, paragraph 3.22 of BP1 is of course, wholly misleading as it compares housing target figures that relate to two different time periods. The 11,000 dwellings target relates to the housing requirement set out in SEP between the period 2006 and 2026 (i.e. equal to 550 dwellings per annum), whereas the Council’s reduced figure of 9,600 dwellings relates to an extended 4 year period between 2006 – 2030 which would be the equivalent of 400 dwellings per annum (i.e. a reduction of 150 dwellings per annum over the entire Plan period compared to the SEP). Thus, not only is the PSCS DPD not legally compliant in failing to be in accordance with the Development Plan (or its time period), but also it is not sound, as no satisfactory justification has been provided for the substantial reduction in the housing period and over an extended plan period. Moreover, no justification has been made as to why the council fails to take on board the evidence which clearly supports a higher housing provision than that proposed within the adopted RSS, particularly taking on board the Governments growth agenda.

Details of Changes to be Made:
We therefore suggest that the submitted Core strategy needs to be amended to take into the account the extant development plan, including the South East Plan’s housing target at the very least, but with a recognition for a higher level of growth should be planned for. At the very least therefore, there needs to be a larger degree of flexibility built into the document. Whilst the Council has within paragraphs 5.18 – 5.20, as well as policy WCS5 sought to provide a contingency within the document, this does not go far enough and needs to be far more robust to take account, as identified above of the chronic affordable housing issues that exist within the District.

### Representation ID

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<thead>
<tr>
<th>Representation ID</th>
<th>1554</th>
</tr>
</thead>
<tbody>
<tr>
<td>Person ID</td>
<td>Mr Williams</td>
</tr>
<tr>
<td>Agent ID</td>
<td>Kember Loudon Williams</td>
</tr>
</tbody>
</table>

Paragraph 3.11

**Sound**

- Yes ■ No □
- Justified □ Effective ■
- Consistent with national policy □

**Legally Compliant**

- Yes ■ No □

**Details of Reasons for Soundess/ Legal Complaince:**

The Number of Dwelling Proposed to be delivered. (Paragraphs 3.8 – 3.17, Policy WCS1) 1 The Council states that the Core Strategy intends that a total of around 9,600 dwellings will be created in the period 2006 to 2030. This is made up as follows: Houses already build (to April 2010) 1331 Existing commitments 3558 Proposed Additional Housing 4685 Total 9579

**Details of Changes to be Made:**

2 Paragraph 3.10 of the Proposed Submission Core Strategy states that the Council expects the population of the District to increase between 2006 and 2030 by approximately 19,000, which represents 16,800 households. It is clear therefore that the number of new households likely to be created in the district over the plan period will be far in excess of the number of new dwellings planned. Even if all of the new dwellings proposed are delivered this will only meet the needs of 57% of the expected new households. Well over 7,000 households will remain in housing need.
Paragraph 3.11

Details of Reasons for Soundess/ Legal Complaince:
1. The Council states that the Core Strategy intends that a total of around 9,600 dwellings will be created in the period 2006 to 2030. This is made up as follows: Houses already built (to April 2010) 1331 Existing commitments 3558 Proposed additional housing 4685 TOTAL 9579 2. Paragraph 3.10 of the Proposed Submission Core Strategy states that the Council expects the population of the district to increase between 2006 and 2030 by approximately 19,000, which represents 16,800 households. It is clear therefore that the number of new households likely to be created in the district over the plan period will be far in excess of the number of new dwellings planned. Even if all of the new dwellings proposed are delivered this will only meet the needs of 57% of the expected new households. Well over 7,000 households will remain in housing need. 3 On this basis the Core Strategy is unsound because the numbers of dwellings proposed to be delivered does not properly reflect the expected housing need. A larger number of dwellings should therefore be planned for in Policy WCS1 to redress the shortfall in District-wide housing allocations. The total should be closer to the number of new households expected to be created over the plan period.

Details of Changes to be Made:
The total number of dwellings to be provided should be increased, with significantly more housing development being identified in the north of the District where the market is stronger and a known need for housing exists.

Representation ID
1510

Person ID Mr Williams
103948

Agent ID Mr Nightingale
Kember Loudon Williams

Paragraph 3.11

Sound ☐ Yes ☑ No ☑ Justified ☑ Effective ☐ Consistent with national policy

Legally Compliant ☐ Yes ☐ No

Details of Reasons for Soundess/ Legal Complaince:
1. The Council states that the Core Strategy intends that a total of around 9,600 dwellings will be created in the period 2006 - 2030. This is made up as follows: Houses already built to April 2010 1331 Existing commitments 3558 Proposed additional housing 4685 TOTAL 9579 2. Paragraph 3.10 of the Proposed Submission Core Strategy states that the Council expects the population of the District to increase between 2006 and 2030 by approximately 19,000 which represents 16,800 households. It is clear therefore that the number of new households likely to be created in the district over the plan period will be far in excess of the number of dwellings planned. Even if all of the new dwellings proposed are delivered this will only meet the needs of 57% of the expected new households. Well over 7,000 households will remain in housing need. Due to the size of additional appendices they have not been uploaded but are available to view at the Council's offices.

Details of Changes to be Made:
3. On this basis the Core Strategy is unsound because the numbers of dwellings that are proposed to be delivered are deficient and do not properly reflect the expected housing need. A larger number of dwellings should therefore be planned for in Policy WCS1 to redress the shortfall in District-wide housing allocations.
Details of Reasons for Soundess/ Legal Complaince:

No mention is made in the text to the proposed allocation of land at Crowborough for housing development. We consider that the need for an urban extension to the town is necessary in order to deliver for those in housing need and those services that are urgently required to support the area of deprivation in the town.

Details of Changes to be Made:
The text should be amended to include Crowborough within the list of towns to be extended.

Details of Reasons for Soundess/ Legal Complaince:
The inability of the Wealden District to accommodate all of the housing needs and demands associated with this part of the South East is acknowledged however it is considered that an artificial level of self-imposed constraint has resulted in a Core Strategy which fails to meet the identified annual completion rate established within the South East Plan. The self-imposed constraint results from, in Hailsham’s case, the incomplete studies relating to development options and related traffic modelling and additionally the decision to restrict growth on the basis of waste water treatment works capacity. The latter is currently the subject of a study which will become available shortly. These studies may well identify sufficient scope to accommodate further growth linked to the funding of key infrastructure. At present the Core Strategy simply assumes that there will be no flexibility or potential for additional growth. In the case of Hailsham the "community aspiration" is clearly a reference to the Hailsham & Hellingly Masterplan (Jan 2009). This was jointly produced by the Hailsham Town and Hellingly Parish Councils. Significantly it did not attempt to accommodate growth in response to the provisions of the South East Plan but instead drew upon the former East Sussex Structure Plan (for the Period to 2011) as the numerical basis for housing provision. To that extent therefore the community aspiration as translated into the Masterplan failed to set the most appropriate level of strategic planning policy as the context within which to inform and develop the community's Masterplan. Again this appears as a self-imposed constraint based upon a predetermined view as to preferred sites as opposed to an informed choice based upon the requirements of the South East Plan.

Details of Changes to be Made:
The "...other environmental, economic, social, infrastructure and community aspirations..," which have have been applied in setting the level of residential development require re evaluation in the light of for instance, the completion of studies into infrastructure provision, the assessment of development led funding and phasing options and the potential application of a Community Infrastructure Levey (or CIL).
Paragraph 3.11

Details of Reasons for Soundess/ Legal Complaince:

"Supplementary documents have been submitted but not attached, and may be viewed at the Council offices on request". Paragraph 3.22 The Council have relied on environmental and infrastructure provision constraints in order to argue that it is not possible to meet the trend based household projections for the district. This report has demonstrated that there are not either environment or infrastructure constraints which prevent the trend based household forecasts for the district being met. In fact there are pressing needs relating to the provision of affordable housing, workforce requirements and service support why the trend based rather than some lower figure should be met and as demonstrated in this report.

Details of Changes to be Made:

REVISION SOUGHT. !In order to improve the performance of our economy, regenerate our market towns and meet housing needs at least 7,211 dwellings have been identified as urban extensions or infill in Heathfield, Uckfield, Hailsham Polegate and Willingdon, Stone Cross and adjacent to the boundary with Tunbridge Wells in the parish of Frant. In total, with commitments, this provides for around 12,100 dwellings between 2006 and 2030

Sound  No  No  No  No  No
Legally Compliant  No  No

Details of Reasons for Soundess/ Legal Complaince:

Concern raised at the reference to Polegate and Willingdon as one settlement

Details of Changes to be Made:

Representation ID
1590

Paragraph 3.11

Sound  No  No  No  No  No
Legally Compliant  No  No

Details of Reasons for Soundess/ Legal Complaince:

Concern raised at the reference to Polegate and Willingdon as one settlement

Details of Changes to be Made:

Representation ID
1736

Paragraph 3.11

Sound  No  No  No  No  No
Legally Compliant  No  No

Details of Reasons for Soundess/ Legal Complaince:

We are concerned that under present proposals the essential housing needs for market and affordable housing will not be met. 3.10 Trend based projections show demand for market and affordable housing is high “and in excess of what Wealden could accommodate or deliver” 3.11 Confusingly it goes on to meet this need in urban extensions at Heathfield, Uckfield, Hailsham, Polegate, Willingdon, Stone Cross and Frant.

Details of Changes to be Made:
Details of Reasons for Soundness/ Legal Complaince:

We are intrigued by the Councils intended adoption of an unsound housing position. The Council’s proposals for the provision of housing development during the period 2006 – 2030 demonstrate that the Council’s Local Development Framework Document is not in conformity with the Regional Spatial Strategy, which forms part of the Development Plan. Paragraph 3.3 of the Council’s Background Paper no. 1 (BP1) states “Current legislation requires that the Core Strategy is in general conformity with the Regional Spatial Strategy, the South East Plan” (SEP), which was adopted in May 2009. In paragraph 3.3 of BP1, the Council also acknowledge that “The South East Plan requires that at least 11,000 dwellings is provided in Wealden District between 2006 and 2026”. The SEP (Policy H1) requires 11,000 new dwellings to be provided in Wealden District between 2006 and 2026, equal to an overall annual requirement of 550 per year. Paragraph 3.3 of the Council’s BP1 states “Because of existing planning permissions and houses that have already been built since 2006, overall we need to find locations for a total of approximately 7,000 new houses between now and 2026”. Assuming 550 dwellings per year based on the SEP housing requirement, extending the PSCS DPD end date to 2030 (i.e. 4 more years) would require an additional 2,200 dwellings, bringing this total to the equivalent of 9,200 dwellings between 2006 and 2030. Policy WCS2 indicates that 4,889 dwellings are already committed (through planning permissions, commencements etc.) as at 1st April 2010. Set against the SEP requirement, this would leave a residual requirement for 6,111 dwellings up to 2026 (i.e. 11,000 minus 4,889) and if the SEP requirement were to be extended by 4 years up to 2030 (at 550 dwellings per year i.e. a total of 2,200 dwellings), this would create a total residual requirement of 8,311 additional dwellings by 2030. This residual requirement is the equivalent of 415 dwellings per annum during the remaining 20 year period between April 2010 and April 2030. By contrast, draft Policy WCS1 provides for a total provision of 9,600 dwellings between 2006 and 2030. Taking account of 4,889 dwelling commitments, this leaves only 4,685 new dwellings during the remaining 20 year period. This is the equivalent of only 230 dwellings per year (i.e. just over half that implied by extending the annual housing requirement set out in Policy H1 of the SEP to 2030). In draft Policy WCS2, the 9,600 dwelling figure referred to in draft Policy WCS1 has a total of 9,574 dwellings during the same 2006 – 2030 time period. The Council has not provided any justification for failing to comply with the housing requirements set out in SEP and no justification has been provided as to how the seemingly speculative figure of 9,600 dwellings or 9,574 dwellings has been arrived at for the housing requirement during the period 2006 – 2030 in draft Policies WCS1 and WCS2. As the council are aware there have been a number of recent announcements regarding the emerging Localism Bill and the changes being sought by the Government and we have looked to deal with these within our comments. As the Council is aware, Section 19 of the Planning and Compulsory Purchase Act 2004 (as amended) deals with the Preparation of local development documents. Section 19(2) specifically states that: “In preparing a Development Plan Document or any other local development document the local planning authority must have regard to (a) national policies and advice contained in guidance issued by the Secretary of State; (b) the RSS for the region in which the area of the authority is situated, if the area is outside Greater London”; (h) any other local development document which has been adopted by the authority”. The adopted South East Plan therefore remains part of the development plan and whatever the Council believes cannot be used as a reason for not complying with 19(2)(b) as this is a statutory requirement. This is particularly true bearing in mind recent appeal decisions, which confirm the status of the RSS’s and the limited weight that can be attributed at this time to the emerging Localism Bill. Accordingly any DPD that appears prior to enactment of the Localism Bill which materially departs from the RSS must be found unsound given that it would not comply with statute, particularly given the Governments recent announcement that an Environmental Assessment will now be carried out to consider the removal of the RSS’s. By any reasonable standard, this is likely to take a long period of time and it is therefore fair to assume the RSS’s will remain as part of the development plan for a good period to come. Nonetheless, even ignoring the above the Government remains committed to the delivery of more housing and it therefore seems perverse for the council to be attempting to adopt a strategy which seeks to reduce what should be recognised at the very least, as a minimum housing requirement. It is clear from all the above therefore that the RSS remains in law as part of the development plan and cannot be ignored, as the council appears to be seeking to do. We also refer the council back to the founding principles of the emerging local development framework. For example PPS 12 confirms that the Core Strategies; “4.36 Core strategies must be justifiable: they must be: • founded on a robust and credible evidence base; and • the most appropriate strategy when considered against the reasonable alternatives”. We question whether the council’s unjustified Housing Growth figures meet this simple test as presently emerging and we maintain therefore that the Councils emerging Core Strategy is not only deficient because it ignores the
adopted RSS, but it also not founded on the most up to date evidence base. Perhaps, however most importantly we draw the council's attention to the evidence base it has at its disposal and indeed comments it makes in supporting documents for this Core Strategy. Paragraph 5.3 of the “Managing the Delivery of Housing Background Paper” – Background Paper 2 notes that “the Council’s Housing Needs Assessment highlights the acute level of affordable housing need within the District and it is noted that the main means of achieving affordable housing delivery is by the means of the construction of market housing…” Paragraph 6.11 of the same document goes onto confirm that “on this basis, the assessment has identified an annual affordable housing need of 812 in Wealden”. On the basis that the delivery of affordable housing, as accepted by the Council is predicated on the delivery of market accommodation, the evidence supports a much higher level of growth than that envisaged by paragraphs 3.8 – 3.17 and more importantly policies WCS1 and WCS2 of the consultation document. Indeed, it is obvious from the above that a target of 4,685 new homes over the period 2006 – 2026 is neither robust or indeed accurate and would continue to exacerbate the ongoing chronic housing deficiencies in the district. Furthermore, paragraph 3.22 of BP1 is of course, wholly misleading as it compares housing target figures that relate to two different time periods. The 11,000 dwellings target relates to the housing requirement set out in SEP between the period 2006 and 2026 (i.e. equal to 550 dwellings per annum), whereas the Council’s reduced figure of 9,600 dwellings relates to an extended 4 year period between 2006 – 2030 which would be the equivalent of 400 dwellings per annum (i.e. a reduction of 150 dwellings per annum over the entire Plan period compared to the SEP). Thus, not only is the PSCS DPD not legally compliant in failing to be in accordance with the Development Plan (or its time period), but also it is not sound, as no satisfactory justification has been provided for the substantial reduction in the housing period and over an extended plan period. Moreover, no justification has been made as to why the council fails to take on board the evidence which clearly supports a higher housing provision than that proposed within the adopted RSS, particularly taking on board the Governments growth agenda.

Details of Changes to be Made:
We therefore suggest that the submitted Core strategy needs to be amended to take into the account the extant development plan, including the South East Plan’s housing target at the very least, but with a recognition for a higher level of growth should be planned for. At the very least therefore, there needs to be a larger degree of flexibility built into the document. Whilst the Council has within paragraphs 5.18 – 5.20, as well as policy WCS5 sought to provide a contingency within the document, this does not go far enough and needs to be far more robust to take account, as identified above of the chronic affordable housing issues that exist within the District.
We are intrigued by the Council's intended adoption of an unsound housing position. The Council's proposals for the provision of housing development during the period 2006 – 2030 demonstrate that the Council's Local Development Framework Document is not in conformity with the Regional Spatial Strategy, which forms part of the Development Plan. Paragraph 3.3 of the Council's Background Paper no. 1 (BP1) states “Current legislation requires that the Core Strategy is in general conformity with the Regional Spatial Strategy, the South East Plan” (SEP), which was adopted in May 2009. In paragraph 3.3 of BP1, the Council also acknowledge that “The South East Plan requires that at least 11,000 dwellings is provided in Wealden District between 2006 and 2026”. The SEP (Policy H1) requires 11,000 new dwellings to be provided in Wealden District between 2006 and 2026, equal to an overall annual requirement of 550 per year. Paragraph 3.3 of the Council's BP1 states “Because of existing planning permissions and houses that have already been built since 2006, overall we need to find locations for a total of approximately 7,000 new houses between now and 2026”. Assuming 550 dwellings per year based on the SEP housing requirement, extending the PSCS DPD end date to 2030 (i.e. 4 more years) would require an additional 2,200 dwellings, bringing this total to the equivalent of 9,200 dwellings between 2006 and 2030. Policy WCS2 indicates that 4,889 dwellings are already committed (through planning permissions, commencements etc.) as at 1st April 2010. Set against the SEP requirement, this would leave a residual requirement for 6,111 dwellings up to 2026 (i.e. 11,000 minus 4,889) and if the SEP requirement were to be extended by 4 years up to 2030 (at 550 dwellings per year i.e. a total of 2,200 dwellings), this would create a total residual requirement of 8,311 additional dwellings by 2030. This residual requirement is the equivalent of 415 dwellings per annum during the remaining 20 year period between April 2010 and April 2030. By contrast, draft Policy WCS1 provides for a total provision of 9,600 dwellings between 2006 and 2030. Taking account of 4,889 dwelling commitments, this leaves only 4,711 new dwellings during the remaining 20 year period. This is the equivalent of only 235 dwellings per year (i.e. just over half that implied by extending the annual housing requirement set out in Policy H1 of the SEP to 2030). In draft Policy WCS2, the 9,600 dwelling figure referred to in draft Policy WCS1 has a total of 9,574 dwellings during the same 2006 – 2030 time period. The Council has not provided any justification for failing to comply with the housing requirements set out in SEP and no justification has been provided as to how the seemingly speculative figure of 9,600 dwellings or 9,574 dwellings has been arrived at for the housing requirement during the period 2006 – 2030 in draft PoliciesWSC1 and WSC2. As the council are aware there have been a number of recent announcements regarding the emerging Localism Bill and the changes being sought by the Government and we have looked to deal with these within our comments. As the Council is aware, Section 19 of the Planning and Compulsory Purchase Act 2004 (as amended) deals with the Preparation of local development documents. Section 19(2) specifically states that: “In preparing a Development Plan Document or any other local development document the local planning authority must have regard to (a) national policies and advice contained in guidance issued by the Secretary of State; (b) the RSS for the region in which the area of the authority is situated, if the area is outside Greater London”; (h) any other local development document which has been adopted by the authority”. The adopted South East Plan therefore remains part of the development plan and whatever the Council believes cannot be used as a reason for not complying with 19(2)(b) as this is a statutory requirement. This is particularly true bearing in mind recent appeal decisions, which confirm the status of the RSS’s and the limited weight that can be attributed at this time to the emerging Localism Bill. Accordingly any DPD that appears prior to enactment of the Localism Bill which materially departs from the RSS must be found unsound given that it would not comply with statute, particularly given the Governments recent announcement that an Environmental Assessment will now be carried out to consider the removal of the RSS’s. By any reasonable standard, this is likely to take a long period of time and it is therefore fair to assume the RSS’s will remain as part of the development plan for a good period to come. Nonetheless, even ignoring the above the Government remains committed to the delivery of more housing and it therefore seems perverse for the council to be attempting to adopt a strategy which seeks to reduce what should be recognised at the very least, as a minimum housing requirement. It is clear from all the above therefore that the RSS remains in law as part of the development plan and cannot be ignored, as the council appears to be seeking to do. We also refer the council back to the founding principles of the emerging local development framework. For example PPS 12 confirms that the Core Strategies; “4.36 Core strategies must be justifiable: they must be: • founded on a robust and credible evidence base; and • the most appropriate strategy when considered against the reasonable alternatives”. We question whether the council’s unjustified Housing Growth figures meet this simple test as presently emerging and we maintain therefore that the Councils emerging Core Strategy is not only deficient because it ignores the
adopted RSS, but it also not founded on the most up to date evidence base. Perhaps, however most importantly
we draw the council’s attention to the evidence base it has at its disposal and indeed comments it makes in
supporting documents for this Core Strategy. Paragraph 5.3 of the “Managing the Delivery of Housing Background
Paper” – Background Paper 2 notes that “the Councils Housing Needs Assessment highlights the acute level of
affordable housing need within the District and it is noted that the main means of achieving affordable housing
delivery is by the means of the construction of market housing…” Paragraph 6.11 of the same document goes
onto confirm that “on this basis, the assessment has identified an annual affordable housing need of 812 in
Wealden”. On the basis that the delivery of affordable housing, as accepted by the Council is predicated on the
delivery of market accommodation, the evidence supports a much higher level of growth than that envisaged by
paragraphs 3.8 – 3.17 and more importantly policies WCS1 and WCS2 of the consultation document. Indeed, it is
obvious from the above that a target of 4,685 new homes over the period 2006 – 2026 is neither robust or indeed
accurate and would continue to exacerbate the ongoing chronic housing deficiencies in the district. Furthermore,
paragraph 3.22 of BP1 is of course, wholly misleading as it compares housing target figures that relate to two
different time periods. The 11,000 dwellings target relates to the housing requirement set out in SEP between the
period 2006 and 2026 (i.e. equal to 550 dwellings per annum), whereas the Council’s reduced figure of 9,600
dwellings relates to an extended 4 year period between 2006 – 2030 which would be the equivalent of 400
dwellings per annum (i.e. a reduction of 150 dwellings per annum over the entire Plan period compared to the
SEP). Thus, not only is the PSCS DPD not legally compliant in failing to be in accordance with the Development
Plan (or its time period), but also it is not sound, as no satisfactory justification has been provided for the
substantial reduction in the housing period and over an extended plan period. Moreover, no justification has been
made as to why the council fails to take on board the evidence which clearly supports a higher housing provision
than that proposed within the adopted RSS, particularly taking on board the Governments growth agenda.

Details of Changes to be Made:
We therefore suggest that the submitted Core strategy needs to be amended to take into the account the extant
development plan, including the South East Plan’s housing target at the very least, but with a recognition for a
higher level of growth should be planned for. At the very least therefore, there needs to be a larger degree of
flexibility built into the document. Whilst the Council has within paragraphs 5.18 – 5.20, as well as policy WCS5
sought to provide a contingency within the document, this does not go far enough and needs to be far more robust
to take account, as indentified above of the chronic affordable housing issues that exist within the District.

Representation ID
1263
Person ID Mr Webster Agent ID
534840
Paragraph 3.12
Sound Yes No Justified Effective Consistent with national policy
Legally Compliant Yes No
Details of Reasons for Soundess/ Legal Complaince:
1.1 The Council states that the Core Strategy intends that a total of around 9,600 dwellings will be created in the
period 2006 - 2040. This is made up as follows. Houses already built (to April 2010) 1331 Existing commitments
3558 Proposed Additional Housing 4685 Total 9579
1.2 paragraph 3.10 of the Proposed Submission Core
Strategy states that the Council expects the population of the district to increase between 2006 and 2030 by
approximately 19,000 which represents 16,800 households. It is clear therefore that the number of new
households likely to be created in the district over the plan period will be far in excess of the number of new
dwellings planned. Even if all the new dwellings proposed are delivered this will only meet the needs of 57% of the
expected new households. Well over 7,000 households will remain in housing need.

Details of Changes to be Made:
On this basis the Core Strategy is unsound because the numbers of dwellings proposed to be deliverd does not
properly reflect the expected housing need. A larger number of dwellings should be planned for in Policy WCS1 to
redress the shortfall in District-wide housing allocations. the total should be closer to the number of new
households expected to be created over the plan period.
Paragraph 3.12
Details of Reasons for Soundness/ Legal Complaince:
The Council states that the Core Strategy intends that a total of around 9,600 dwellings will be created in the period 2006 - 2040. This is made up as follows. Houses already built (to April 2010) 1331 Existing commitments 3558 Proposed additional housing 4685 Total 9579
2. Paragraph 3.10 of the Proposed Submission Core Strategy states that the Council expects the population of the district to increase between 2006 and 2030 by approximately 19,000 which represents 16,800 households. It is clear therefore that the number of new households likely to be created in the district over the plan period will be far in excess of the number of new dwellings planned. Even if all the new dwellings proposed are delivered this will only meet the needs of 57% of the expected new households. Well over 7,000 households will remain in housing need. Due to the size of additional appendices they have not been uploaded but are available to view at the Council's offices.

Details of Changes to be Made:
3. On this basis the Core Strategy is unsound because the numbers of dwellings that are proposed to be delivered do not properly reflect the expected housing need. A larger number of dwellings should therefore be planned for in Policy WCS1 to redress the shortfall in District-wide housing allocations.

Representation ID
1245
Person ID Dekl 344781
Agent ID Mr Nightingale 102571
Kember Loudon Williams

Paragraph 3.12
Sound ☑ No ☑ Justified ☑ Effective ☐ Consistent with national policy
Legally Compliant ☐ Yes ☐ No

Details of Reasons for Soundness/ Legal Complaince:
The total number of dwellings to be provided should be increased, with significantly more housing development being identified in the north of the district where the market is stronger and a known need for housing exists.

Representation ID
1511
Person ID Mr Williams 103948
Agent ID Kember Loudon Williams

Paragraph 3.12
Sound ☐ Yes ☐ No ☐ Justified ☑ Effective ☐ Consistent with national policy
Legally Compliant ☐ Yes ☐ No

Details of Reasons for Soundness/ Legal Complaince:
1. The Council states that the Core Strategy intends that a total of around 9,600 dwellings will be created in the period 2006 - 2030. This is made up as follows: Houses already built to April 2010 1331 Existing commitments 3558 Proposed additional housing 4685 Total 9579
2. Paragraph 3.10 of the Proposed Submission Core Strategy states that the Council expects the population of the District to increase between 2006 and 2030 by approximately 19,000 which represents 16,800 households. It is clear therefore that the number of new households likely to be created in the district over the plan period will be far in excess of the number of dwellings planned. Even if all of the new dwellings proposed are delivered this will only meet the needs of 57% of the expected new households. Well over 7,000 households will remain in housing need. Due to the size of additional appendices they have not been uploaded but are available to view at the Council's offices.

Details of Changes to be Made:
3. On this basis the Core Strategy is unsound because the numbers of dwellings that are proposed to be delivered are deficient and do not properly reflect the expected housing need. A larger number of dwellings should therefore be planned for in Policy WCS1 to redress the shortfall in District-wide housing allocations.
1 The Council states that the Core Strategy intends that a total of around 9,600 dwellings will be created in the period 2006 to 2030. This is made up as follows: Houses already built (to April 2010) 1331 Existing commitments 3558 Proposed Additional Housing 4685 TOTAL 9579 2 Paragraph 3.10 of the Proposed Submission Core Strategy states that the Council expects the population of the district to increase between 2006 and 2030 by approximately 19,000, which represents 16,800 households. It is clear therefore that the number of new households likely to be created in the district over the plan period will be far in excess of the number of new dwellings planned. Even if all of the new dwellings proposed are delivered this will only meet the needs of 57% of the expected new households. Well over 7,000 households will remain in housing need. 3 On this basis the Core Strategy is unsound because the numbers of dwellings proposed to be delivered does not properly reflect the expected housing need. A larger number of dwellings should be planned for in Policy WCS1 to redress the shortfall in District-wide housing allocations. The total should be closer to the number of new households expected to be created over the plan period.

Details of Changes to be Made:
The total number of dwellings to be provided should be increased, with significantly more housing development being identified in the north of the District where the market is stronger and a known need for housing exists.

1 The Council states that the Core Strategy intends that a total of around 9,600 dwellings will be created in the period 2006 to 2030. This is made up as follows: Houses already built (to April 2010) 1331 Existing commitments 3558 Proposed Additional Housing 4685 TOTAL 9579 2 Paragraph 3.10 of the Proposed Submission Core Strategy states that the Council expects the population of the district to increase between 2006 and 2030 by approximately 19,000, which represents 16,800 households. It is clear therefore that the number of new households likely to be created in the district over the plan period will be far in excess of the number of new dwellings planned. Even if all of the new dwellings proposed are delivered this will only meet the needs of 57% of the expected new households. Well over 7,000 households will remain in housing need.

Details of Changes to be Made:
The total number of dwellings to be provided should be increased, with significantly more housing development being identified in the north of the District where the market is stronger and a known need for housing exists.
Representation ID
1633
Person ID  Pelham Homes
107745  Agent ID  Mrs. Owen
102625  Jennifer Owen & Associates Ltd.
Paragraph  3.12
Sound  □ Yes  ☑ No  □ Justified  □ Effective  □ Consistent with national policy
Legally Compliant  □ Yes  ☑ No
Details of Reasons for Soundness/ Legal Complaince:
"Supplementary documents have been submitted but not attached, and may be viewed at the Council offices on request". Paragraph 3.12. It is important to note that those in need of affordable housing in the district cannot have been taken into account in the amount of housing proposed by the Council in the CS because this would mean that some of those currently on the housing waiting list will not be allocated a home in the plan period. This fact is evidence in the Council’s paragraph 8.10 of the BP2 Managing the Delivery of Housing where it is recognised that households currently on the Council’s waiting list for homes in Polegate will wait 34/235 years to be housed.

Details of Changes to be Made:

Representation ID
1645
Person ID  Rydon Homes Ltd
516047  Agent ID  Mr. Hough
516026  Sigma Planning Services
Paragraph  3.12
Sound  □ Yes  ☑ No  ☑ Justified  ☑ Effective  □ Consistent with national policy
Legally Compliant  □ Yes  ☑ No
Details of Reasons for Soundness/ Legal Complaince:
The CS is not supportive of the aims and aspirations set out in the Town Council document entitled "Crowborough Vision". Considerably more certainty about the relevant location and a greater scale of economic and housing growth are required to achieve local aspirations.

Details of Changes to be Made:
Re-visit the scale and location of economic and housing growth in Crowborough to make the plan compatible with the delivery of the Town Council vision
Paragraph 3.13 does not accurately reflect Heathfield’s ability to accommodate greater growth. The factors identified do not justify limiting growth to only 160 dwellings in the town and therefore the spatial strategy applied to Heathfield is misconceived. Planning Policy Statement 7: Sustainable Development Rural Areas, states (para21): National designated areas comprising National Parks, the Broads the New Forest Heritage Area and Areas of Outstanding Natural Beauty (AONB) have been confirmed by the Government as having the highest status of protection in relation to landscape and scenic beauty. The conservation of the natural beauty and countryside should therefore be given great weight in planning policy and development control decisions.... as well as reflecting these priorities planning policies in LDDs and where appropriate, RSS, should also support suitably located and designed development necessary to facilitate the economic and social well-being of these designated areas and their communities, including the provision of adequate housing to meet indemnified local need* PPS7 therefore states that development in the AONB should be subject of rigorous examination. However it also recognises that planning policies should support suitably located and designed development that contributes to the economic and social wellbeing of these designated areas and their communities, including the provision of adequate housing to meet identified local needs. Restricting development in a sustainable location such as Heathfield due to its landscape characteristics and AONB is therefore unjustifiable. Delivery of only 160 dwellings over the next 19 years is not sufficient to contribute towards meeting the local need for general market housing and affordable housing, nor will it support the retention of local services and the local economy. Consequently the aspiration to ‘retain and enhance the role of the centres providing services not only to local residents but also to surround villages’ will not be achieved.

Details of Changes to be Made:
It is necessary to re-assess the potential for Heathfield to accommodate growth.
Summary of all Representations - Proposed Submission Core Strategy Regulation 27 - Report 11th July 2011

 Representation ID 1176
 Person ID 522185
 Agent ID 261712
 Paragraph 3.13
 Representation Details of Reasons for Soundess/ Legal Complaince:
 This paragraph is not supported by the evidence collected during the preparation of the Core Strategy. In particular the statement that the growth potential of Crowborough is constrained by the AONB is not justified since there are sites located to the south of the town - outside of the AONB - which the SHLAA identifies as having capacity for 764 dwellings. In addition, the lack of employment facilities in Crowborough is put forward as a constraint to growth. It is recognised that the town currently underperforms in employment provision but that it is clear that this does not serve to make Crowborough an unattractive place to live - far from it since the town exhibits significant housing need - as justified by affordable housing 'first choice' figures. It is also instructive that the town Council's own visioning document Top of the Weald has 'Supporting Business and Enterprise' as a key aim (5) of the document. In this context, the town council clearly aspires to make Crowborough a more attractive place to start and do business. It is suggested that the attractiveness of Crowborough to London bound commuters and also those travelling relatively short distances to the Primary Centres at Tunbridge Wells and Tonbridge - would assist the Council in meeting its objectives set out in Paragraph 6.14 of the Managing the Delivery of Housing Backgroud paper (Feb 2011) which reads as follows: "There is therefore a need for housing provision which would enable some in-migration and halt the natural change towards a declining and more elderly population". Indeed it is suggested that growth at Crowborough - which benefits from better transport links to Primary Centres and London than the settlements which have been identified for growth - Hailsham and Uckfield, which would tend to encourage longer travel distances to workplaces. Although the creation of more self sufficient settlements is a laudable aspiration, there is no evidence that co-location of residential and employment development actually helps to reduce travel demand.

 Details of Changes to be Made:
 Provide adequate development land for sustainable growth and continued vitality of Crowborough

 Representation ID 1246
 Person ID 344781
 Agent ID 102571
 Paragraph 3.13
 Representation Details of Reasons for Soundess/ Legal Complaince:
 The Council states that the Core Strategy intends that a total of around 9,600 dwellings will be created in the period 2006 - 2040. This is made up as follows. Houses already built (to April 2010) 1331 Existing commitments 3558 Proposed Additional Housing 4685 Total 9579 2. paragraph 3.10 of the Porposed Submission Core Strategy states that the Council expects the population of the district to increase between 2006 and 2030 by approximately 19,000 which represents 16,800 households. It is clear therefore that the number of new households likely to be created in the district over the plan period will be far in excess of the number of new dwellings planned. Even if all the new dwellings proposed are delivered this will only meet the needs of 57% of the expected new households. Well over 7,000 households will remain in housing need. 3. On this basis the Core Strategy is unsound because the numbers of dwellings proposed to be delivered does not properly reflect the expected housing need. A larger number of dwellings should be planned for in Policy WCS1 to redress the shortfall in District-wide housing allocations. the total should be closer to the number of new households expected to be created over the plan period.

 Details of Changes to be Made:
 The total number of dwellings to be provided should be increased, with significantly more housing development being identified in the north of the district where the market is stronger and a known need for housing exists.

 Page 147 of 1511
1.1 The Council states that the Core Strategy intends that a total of around 9,600 dwellings will be created in the period 2006 - 2040. This is made up as follows. Houses already built (to April 2010) 1331 Existing commitments 3558 Proposed Additional Housing 4685 Total 9579 1.2 paragraph 3.10 of the Proposed Submission Core Strategy states that the Council expects the population of the district to increase between 2006 and 2030 by approximately 19,000 which represents 16,800 households. It is clear therefore that the number of new households likely to be created in the district over the plan period will be far in excess of the number of new dwellings planned. Even if all the new dwellings proposed are delivered this will only meet the needs of 57% of the expected new households. Well over 7,000 households will remain in housing need.

Details of Changes to be Made:
On this basis the Core Strategy is unsound because the numbers of dwellings proposed to be delivered does not properly reflect the expected housing need. A larger number of dwellings should be planned for in Policy WCS1 to redress the shortfall in District-wide housing allocations. the total should be closer to the number of new households expected to be created over the plan period.
We are intrigued by the Councils intended adoption of an unsound housing position. The Council’s proposals for the provision of housing development during the period 2006 – 2030 demonstrate that the Council’s Local Development Framework Document is not in conformity with the Regional Spatial Strategy, which forms part of the Development Plan. Paragraph 3.3 of the Council’s Background Paper no. 1 (BP1) states “Current legislation requires that the Core Strategy is in general conformity with the Regional Spatial Strategy, the South East Plan” (SEP), which was adopted in May 2009. In paragraph 3.3 of BP1, the Council also acknowledge that “The South East Plan requires that at least 11,000 dwellings is provided in Wealden District between 2006 and 2026”. The SEP (Policy H1) requires 11,000 new dwellings to be provided in Wealden District between 2006 and 2026, equal to an overall annual requirement of 550 per year. Paragraph 3.3 of the Council’s BP1 states “Because of existing planning permissions and houses that have already been built since 2006, overall we need to find locations for a total of approximately 7,000 new houses between now and 2026”. Assuming 550 dwellings per year based on the SEP housing requirement, extending the PSCS DPD end date to 2030 (i.e. 4 more years) would require an additional 2,200 dwellings, bringing this total to the equivalent of 9,200 dwellings between 2006 and 2030. Policy WCS2 indicates that 4,889 dwellings are already committed (through planning permissions, commencements etc.) as at 1st April 2010. Set against the SEP requirement, this would leave a residual requirement for 6,111 dwellings up to 2026 (i.e. 11,000 minus 4,889) and if the SEP requirement were to be extended by 4 years up to 2030 (at 550 dwellings per year i.e. a total of 2,200 dwellings), this would create a total residual requirement of 8,311 additional dwellings by 2030. This residual requirement is the equivalent of 415 dwellings per annum during the remaining 20 year period between April 2010 and April 2030. By contrast, draft Policy WCS1 provides for a total provision of 9,600 dwellings between 2006 and 2030. Taking account of 4,889 dwelling commitments, this leaves only 4,685 new dwellings during the remaining 20 year period. This is the equivalent of only 230 dwellings per year (i.e. just over half that implied by extending the annual housing requirement set out in Policy H1 of the SEP to 2030). In draft Policy WCS2, the 9,600 dwelling figure referred to in draft Policy WCS1 has a total of 9,574 dwellings during the same 2006 – 2030 time period. The Council has not provided any justification for failing to comply with the housing requirements set out in SEP and no justification has been provided as to how the seemingly speculative figure of 9,600 dwellings or 9,574 dwellings has been arrived at for the housing requirement during the period 2006 – 2030 in draft Policies WCS1 and WCS2. As the council are aware there have been a number of recent announcements regarding the emerging Localism Bill and the changes being sought by the Government and we have looked to deal with these within our comments. As the Council is aware, Section 19 of the Planning and Compulsory Purchase Act 2004 (as amended) deals with the Preparation of local development documents. Section 19(2) specifically states that: “In preparing a Development Plan Document or any other local development document the local planning authority must have regard to (a) national policies and advice contained in guidance issued by the Secretary of State; (b) the RSS for the region in which the area of the authority is situated, if the area is outside Greater London”; (h) any other local development document which has been adopted by the authority”. The adopted South East Plan therefore remains part of the development plan and whatever the Council believes cannot be used as a reason for not complying with 19(2)(b) as this is a statutory requirement. This is particularly true bearing in mind recent appeal decisions, which confirm the status of the RSS’s and the limited weight that can be attributed at this time to the emerging Localism Bill. Accordingly any DPD that appears prior to enactment of the Localism Bill which materially departs from the RSS must be found unsound given that it would not comply with statute, particularly given the Governments recent announcement that an Environmental Assessment will now be carried out to consider the removal of the RSS’s. By any reasonable standard, this is likely to take a long period of time and it is therefore fair to assume the RSS’s will remain as part of the development plan for a good period to come. Nonetheless, even ignoring the above the Government remains committed to the delivery of more housing and it therefore seems perverse for the council to be attempting to adopt a strategy which seeks to reduce what should be recognised at the very least, as a minimum housing requirement. It is clear from all the above therefore that the RSS remains in law as part of the development plan and cannot be ignored, as the council appears to be seeking to do. We also refer the council back to the founding principles of the emerging local development framework. For example PPS 12 confirms that the Core Strategies; “4.36 Core strategies must be justifiable: they must be: • founded on a robust and credible evidence base; and • the most appropriate strategy when considered against the reasonable alternatives”. We question whether the council’s unjustified Housing Growth figures meet this simple test as presently emerging and we maintain therefore that the Councils emerging Core Strategy is not only deficient because it ignores the
adopted RSS, but it also not founded on the most up to date evidence base. Perhaps, however most importantly we draw the council’s attention to the evidence base it has at its disposal and indeed comments it makes in supporting documents for this Core Strategy. Paragraph 5.3 of the “Managing the Delivery of Housing Background Paper” – Background Paper 2 notes that “the Councils Housing Needs Assessment highlights the acute level of affordable housing need within the District and it is noted that the main means of achieving affordable housing delivery is by the means of the construction of market housing...” Paragraph 6.11 of the same document goes onto confirm that “on this basis, the assessment has identified an annual affordable housing need of 812 in Wealden”. On the basis that the delivery of affordable housing, as accepted by the Council is predicated on the delivery of market accommodation, the evidence supports a much higher level of growth than that envisaged by paragraphs 3.8 – 3.17 and more importantly policies WCS1 and WCS2 of the consultation document. Indeed, it is obvious from the above that a target of 4,685 new homes over the period 2006 – 2026 is neither robust or indeed accurate and would continue to exacerbate the ongoing chronic housing deficiencies in the district. Furthermore, paragraph 3.22 of BP1 is of course, wholly misleading as it compares housing target figures that relate to two different time periods. The 11,000 dwellings target relates to the housing requirement set out in SEP between the period 2006 and 2026 (i.e. equal to 550 dwellings per annum), whereas the Council’s reduced figure of 9,600 dwellings relates to an extended 4 year period between 2006 – 2030 which would be the equivalent of 400 dwellings per annum (i.e. a reduction of 150 dwellings per annum over the entire Plan period compared to the SEP). Thus, not only is the PSCS DPD not legally compliant in failing to be in accordance with the Development Plan (or its time period), but also it is not sound, as no satisfactory justification has been provided for the substantial reduction in the housing period and over an extended plan period. Moreover, no justification has been made as to why the council fails to take on board the evidence which clearly supports a higher housing provision than that proposed within the adopted RSS, particularly taking on board the Governments growth agenda.

Details of Changes to be Made:
We therefore suggest that the submitted Core strategy needs to be amended to take into the account the extant development plan, including the South East Plan’s housing target at the very least, but with a recognition for a higher level of growth should be planned for. At the very least therefore, there needs to be a larger degree of flexibility built into the document. Whilst the Council has within paragraphs 5.18 – 5.20, as well as policy WCS5 sought to provide a contingency within the document, this does not go far enough and needs to be far more robust to take account, as indentified above of the chronic affordable housing issues that exist within the District.
We are intrigued by the Councils intended adoption of an unsound housing position. The Council’s proposals for the provision of housing development during the period 2006 – 2030 demonstrate that the Council’s Local Development Framework Document is not in conformity with the Regional Spatial Strategy, which forms part of the Development Plan. Paragraph 3.3 of the Council’s Background Paper no. 1 (BP1) states “Current legislation requires that the Core Strategy is in general conformity with the Regional Spatial Strategy, the South East Plan” (SEP), which was adopted in May 2009. In paragraph 3.3 of BP1, the Council also acknowledge that “The South East Plan requires that at least 11,000 dwellings is provided in Wealden District between 2006 and 2026”. The SEP (Policy H1) requires 11,000 new dwellings to be provided in Wealden District between 2006 and 2026, equal to an overall annual requirement of 550 per year. Paragraph 3.3 of the Council’s BP1 states “Because of existing planning permissions and houses that have already been built since 2006, overall we need to find locations for a total of approximately 7,000 new houses between now and 2026”. Assuming 550 dwellings per year based on the SEP housing requirement, extending the PSCS DPD end date to 2030 (i.e. 4 more years) would require an additional 2,200 dwellings, bringing this total to the equivalent of 9,200 dwellings between 2006 and 2030. Policy WCS2 indicates that 4,889 dwellings are already committed (through planning permissions, commencements etc.) as at 1st April 2010. Set against the SEP requirement, this would leave a residual requirement for 6,111 dwellings up to 2026 (i.e. 11,000 minus 4,889) and if the SEP requirement were to be extended by 4 years up to 2030 (at 550 dwellings per year i.e. a total of 2,200 dwellings), this would create a total residual requirement of 8,311 additional dwellings by 2030. This residual requirement is the equivalent of 415 dwellings per annum during the remaining 20 year period between April 2010 and April 2030. By contrast, draft Policy WCS1 provides for a total provision of 9,600 dwellings between 2006 and 2030. Taking account of 4,889 dwelling commitments, this leaves only 4,711 new dwellings during the remaining 20 year period. This is the equivalent of only 230 dwellings per year (i.e. just over half that implied by extending the annual housing requirement set out in Policy H1 of the SEP to 2030). In draft Policy WCS2, the 9,600 dwelling figure referred to in draft Policy WCS1 has a total of 9,574 dwellings during the same 2006 – 2030 time period. The Council has not provided any justification for failing to comply with the housing requirements set out in SEP and no justification has been provided as to how the seemingly speculative figure of 9,600 dwellings or 9,574 dwellings has been arrived at for the housing requirement during the period 2006 – 2030 in draft Policies WSC1 and WSC2. As the council are aware there have been a number of recent announcements regarding the emerging Localism Bill and the changes being sought by the Government and we have looked to deal with these within our comments. As the Council is aware, Section 19 of the Planning and Compulsory Purchase Act 2004 (as amended) deals with the Preparation of local development documents. Section 19(2) specifically states that: “In preparing a Development Plan Document or any other local development document the local planning authority must have regard to (a) national policies and advice contained in guidance issued by the Secretary of State; (b) the RSS for the region in which the area of the authority is situated, if the area is outside Greater London”; (h) any other local development document which has been adopted by the authority”. The adopted South East Plan therefore remains part of the development plan and whatever the Council believes cannot be used as a reason for not complying with 19(2)(b) as this is a statutory requirement. This is particularly true bearing in mind recent appeal decisions, which confirm the status of the RSS’s and the limited weight that can be attributed at this time to the emerging Localism Bill. Accordingly any DPD that appears prior to enactment of the Localism Bill which materially departs from the RSS must be found unsound given that it would not comply with statute, particularly given the Governments recent announcement that an Environmental Assessment will now be carried out to consider the removal of the RSS’s. By any reasonable standard, this is likely to take a long period of time and it is therefore fair to assume the RSS’s will remain as part of the development plan for a good period to come. Nonetheless, even ignoring the above the Government remains committed to the delivery of more housing and it therefore seems perverse for the council to be attempting to adopt a strategy which seeks to reduce what should be recognised at the very least, as a minimum housing requirement. It is clear from all the above therefore that the RSS remains in law as part of the development plan and cannot be ignored, as the council appears to be seeking to do. We also refer the council back to the founding principles of the emerging local development framework. For example PPS 12 confirms that the Core Strategies; “4.36 Core strategies must be justifiable: they must be: • founded on a robust and credible evidence base; and • the most appropriate strategy when considered against the reasonable alternatives”. We question whether the council’s unjustified Housing Growth figures meet this simple test as presently emerging and we maintain therefore that the Councils emerging Core Strategy is not only deficient because it ignores the
adopted RSS, but it also not founded on the most up to date evidence base. Perhaps, however most importantly we draw the council’s attention to the evidence base it has at its disposal and indeed comments it makes in supporting documents for this Core Strategy. Paragraph 5.3 of the “Managing the Delivery of Housing Background Paper” – Background Paper 2 notes that “the Councils Housing Needs Assessment highlights the acute level of affordable housing need within the District and it is noted that the main means of achieving affordable housing delivery is by the means of the construction of market housing…” Paragraph 6.11 of the same document goes onto confirm that “on this basis, the assessment has identified an annual affordable housing need of 812 in Wealden”. On the basis that the delivery of affordable housing, as accepted by the Council is predicated on the delivery of market accommodation, the evidence supports a much higher level of growth than that envisaged by paragraphs 3.8 – 3.17 and more importantly policies WCS1 and WCS2 of the consultation document. Indeed, it is obvious from the above that a target of 4,685 new homes over the period 2006 – 2026 is neither robust or indeed accurate and would continue to exacerbate the ongoing chronic housing deficiencies in the district. Furthermore, paragraph 3.22 of BP1 is of course, wholly misleading as it compares housing target figures that relate to two different time periods. The 11,000 dwellings target relates to the housing requirement set out in SEP between the period 2006 and 2026 (i.e. equal to 550 dwellings per annum), whereas the Council’s reduced figure of 9,600 dwellings relates to an extended 4 year period between 2006 – 2030 which would be the equivalent of 400 dwellings per annum (i.e. a reduction of 150 dwellings per annum over the entire Plan period compared to the SEP). Thus, not only is the PSCS DPD not legally compliant in failing to be in accordance with the Development Plan (or its time period), but also it is not sound, as no satisfactory justification has been provided for the substantial reduction in the housing period and over an extended plan period. Moreover, no justification has been made as to why the council fails to take on board the evidence which clearly supports a higher housing provision than that proposed within the adopted RSS, particularly taking on board the Governments growth agenda.

Details of Changes to be Made:
We therefore suggest that the submitted Core strategy needs to be amended to take into the account the extant development plan, including the South East Plan’s housing target at the very least, but with a recognition for a higher level of growth should be planned for. At the very least therefore, there needs to be a larger degree of flexibility built into the document. Whilst the Council has within paragraphs 5.18 – 5.20, as well as policy WCS5 sought to provide a contingency within the document, this does not go far enough and needs to be far more robust to take account, as identified above of the chronic affordable housing issues that exist within the District.

Details of Reasons for Soundess/ Legal Complaince:
The Number of Dwelling Proposed to be delivered. (Paragraphs 3.8 – 3.17, Policy WCS1) 1 The Council states that the Core Strategy intends that a total of around 9,600 dwellings will be created in the period 2006 to 2030. This is made up as follows: Houses already build (to April 2010) 1331 Existing commitments 3558 Proposed Additional Housing 4685 Total 9579

Details of Changes to be Made:
2 Paragraph 3.10 of the Proposed Submission Core Strategy states that the Council expects the population of the District to increase between 2006 and 2030 by approximately 19,000, which represents 16,800 households. It is clear therefore that the number of new households likely to be created in the district over the plan period will be far in excess of the number of new dwellings planned. Even if all of the new dwellings proposed are delivered this will only meet the needs of 57% of the expected new households. Well over 7,000 households will remain in housing need.
Summary of all Representations - Proposed Submission Core Strategy Regulation 27 - Report 11th July 2011

Representation ID
1461

Person ID  Mr Nightingale
332748

Agent ID  Mr Nightingale
102571

Paragraph 3.13

Sound  No
Legally Compliant  No

Details of Reasons for Soundness/ Legal Complaince:
1 The Council states that the Core Strategy intends that a total of around 9,600 dwellings will be created in the period 2006 to 2030. This is made up as follows: Houses already built (to April 2010) 1331 Existing commitments 3558 Proposed Additional Housing 4685 TOTAL 9579 2 Paragraph 3.10 of the Proposed Submission Core Strategy states that the Council expects the population of the district to increase between 2006 and 2030 by approximately 19,000, which represents 16,800 households. It is clear therefore that the number of new households likely to be created in the district over the plan period will be far in excess of the number of new dwellings planned. Even if all of the new dwellings proposed are delivered this will only meet the needs of 57% of the expected new households. Well over 7,000 households will remain in housing need. 3 On this basis the Core Strategy is unsound because the numbers of dwellings proposed to be delivered does not properly reflect the expected housing need. A larger number of dwellings should be planned for in Policy WCS1 to redress the shortfall in District-wide housing allocations. The total should be closer to the number of new households expected to be created over the plan period.

Details of Changes to be Made:
The total number of dwellings to be provided should be increased, with significantly more housing development being identified in the north of the District where the market is stronger and a known need for housing exists.

Representation ID
1512

Person ID  Mr Williams
103948

Agent ID  Kember Loudon Williams

Paragraph 3.13

Sound  No
Legally Compliant  No

Details of Reasons for Soundness/ Legal Complaince:
1 The Council states that the Core Strategy intends that a total of around 9,600 dwellings will be created in the period 2006 - 2030. This is made up as follows: Houses already built (to April 2010) 1331 Existing commitments 3558 Proposed Additional Housing 4685 TOTAL 9579 2 Paragraph 3.10 of the Proposed Submission Core Strategy states that the Council expects the population of the District to increase between 2006 and 2030 by approximately 19,000, which represents 16,800 households. It is clear therefore that the number of new households likely to be created in the district over the plan period will be far in excess of the number of dwellings planned. Even if all of the new dwellings proposed are delivered this will only meet the needs of 57% of the expected new households. Well over 7,000 households will remain in housing need. Due to the size of additional appendices they have not been uploaded but are available to view at the Council's offices.

Details of Changes to be Made:
3 On this basis the Core Strategy is unsound because the numbers of dwellings that are proposed to be delivered are deficient and do not properly reflect the expected housing need. A larger number of dwellings should therefore be planned for in Policy WCS1 to redress the shortfall in District-wide housing allocations.
Paragraph 3.13

Details of Reasons for Soundness/ Legal Compliance:
The church is concerned that the limiting of growth at Crowborough in view of the perceived landscape constraints fails to take account of the following issues. The need to deliver housing for those in need. At present there are 302 on the Housing Register and 120 households in need. Housing growth in the order of 400-450 homes will be required for the private sector to deliver 120 units. Other facilities and services are also required to satisfy need and these again can only be provided by the private sector. The church believes that the landscape issue has not been adequately assessed and unnecessarily constrains the development potential of the area.

Details of Changes to be Made:
Growth at Crowborough should be set at a level which will deliver local services and housing to meet the predicted needs of the population provided that it can be demonstrated that there will be no adverse impact on the AONB.

Representation ID
1646

Person ID
Agent ID
Agent ID
Agent ID
Mr.
Mr.
516047
516026
Rydon Homes Ltd
Sigma Planning Services

Paragraph
3.13

Sound □ Yes ✔ No □ Justified ✔ Effective □ Consistent with national policy

Legally Compliant ✔ Yes □ No

Details of Reasons for Soundness/ Legal Compliance:
This paragraph does not accurately reflect the potential for Crowborough to accommodate growth. The factors identified do not justify limiting growth to an additional 300 dwellings in Crowborough and the policy approach to Crowborough is therefore misconceived.

Details of Changes to be Made:
It is necessary to re-assess the potential for Crowborough to accommodate growth. The SHLAA exercise and other parts of the evidence base demonstrate that it is able to accommodate more housing and employment growth. In particular it should meet housing need and play the role of a principal town meeting wider needs and providing employment opportunities.
Paragraph 3.14

Sound  ☑ Yes   ☐ No    ☑ Justified   ☐ Effective    ☑ Consistent with national policy

Legally Compliant  ☐ Yes   ☐ No

Details of Reasons for Soundness/ Legal Complaince:

We are intrigued by the Council’s intended adoption of an unsound housing position. The Council’s proposals for the provision of housing development during the period 2006 – 2030 demonstrate that the Council’s Local Development Framework Document is not in conformity with the Regional Spatial Strategy, which forms part of the Development Plan. Paragraph 3.3 of the Council’s Background Paper no. 1 (BP1) states “Current legislation requires that the Core Strategy is in general conformity with the Regional Spatial Strategy, the South East Plan” (SEP), which was adopted in May 2009. In paragraph 3.3 of BP1, the Council also acknowledge that “The South East Plan requires that at least 11,000 dwellings is provided in Wealden District between 2006 and 2026”. The SEP (Policy H1) requires 11,000 new dwellings to be provided in Wealden District between 2006 and 2026, equal to an overall annual requirement of 550 per year. Paragraph 3.3 of the Council’s BP1 states “Because of existing planning permissions and houses that have already been built since 2006, overall we need to find locations for a total of approximately 7,000 new houses between now and 2026”. Assuming 550 dwellings per year based on the SEP housing requirement, extending the PSCS DPD end date to 2030 (i.e. 4 more years) would require an additional 2,200 dwellings, bringing this total to the equivalent of 9,200 dwellings between 2006 and 2030. Policy WCS2 indicates that 4,889 dwellings are already committed (through planning permissions, commencements etc.) as at 1st April 2010. Set against the SEP requirement, this would leave a residual requirement for 6,111 dwellings up to 2026 (i.e. 11,000 minus 4,889) and if the SEP requirement were to be extended by 4 years up to 2030 (at 550 dwellings per year i.e. a total of 2,200 dwellings), this would create a total residual requirement of 8,311 additional dwellings by 2030. This residual requirement is the equivalent of 415 dwellings per annum during the remaining 20 year period between April 2010 and April 2030. By contrast, draft Policy WCS1 provides for a total provision of 9,600 dwellings between 2006 and 2030. Taking account of 4,889 dwelling commitments, this leaves only 4,685 new dwellings during the remaining 20 year period. This is the equivalent of only 230 dwellings per year (i.e. just over half that implied by extending the annual housing requirement set out in Policy H1 of the SEP to 2030). In draft Policy WCS2, the 9,600 dwelling figure referred to in draft Policy WCS1 has a total of 9,574 dwellings during the same 2006 – 2030 time period. The Council has not provided any justification for failing to comply with the housing requirements set out in SEP and no justification has been provided as to how the seemingly speculative figure of 9,600 dwellings or 9,574 dwellings has been arrived at for the housing requirement during the period 2006 – 2030 in draft Policies WSC1 and WSC2. As the council are aware there have been a number of recent announcements regarding the emerging Localism Bill and the changes being sought by the Government and we have looked to deal with these within our comments. As the Council is aware, Section 19 of the Planning and Compulsory Purchase Act 2004 (as amended) deals with the Preparation of local development documents. Section 19(2) specifically states that: “In preparing a Development Plan Document or any other local development document the local planning authority must have regard to (a) national policies and advice contained in guidance issued by the Secretary of State; (b) the RSS for the region in which the area of the authority is situated, if the area is outside Greater London”; (h) any other local development document which has been adopted by the authority”. The adopted South East Plan therefore remains part of the development plan and whatever the Council believes cannot be used as a reason for not complying with 19(2)(b) as this is a statutory requirement. This is particularly true bearing in mind recent appeal decisions, which confirm the status of the RSS’s and the limited weight that can be attributed at this time to the emerging Localism Bill. Accordingly any DPD that appears prior to enactment of the Localism Bill which materially departs from the RSS must be found unsound given that it would not comply with statute, particularly given the Governments recent announcement that an Environmental Assessment will now be carried out to consider the removal of the RSS’s. By any reasonable standard, this is likely to take a long period of time and it is therefore fair to assume the RSS’s will remain as part of the development plan for a good period to come. Nonetheless, even ignoring the above the Government remains committed to the delivery of more housing and it therefore seems perverse for the council to be attempting to adopt a strategy which seeks to reduce what should be recognised at the very least, as a minimum housing requirement. It is clear from all the above therefore that the RSS remains in law as part of the development plan and cannot be ignored, as the council appears to be seeking to do. We also refer the council back to the founding principles of the emerging local development framework. For example PPS 12 confirms that the Core Strategies; “4.36 Core strategies must be justifiable: they must be: • founded on a robust and credible evidence base; and • the most appropriate strategy when considered against the reasonable alternatives”. We question whether the council’s unjustified Housing Growth figures meet this simple test as presently emerging and we maintain therefore that the Councils emerging Core Strategy is not only deficient because it ignores the
adopted RSS, but it also not founded on the most up to date evidence base. Perhaps, however most importantly we draw the council’s attention to the evidence base it has at its disposal and indeed comments it makes in supporting documents for this Core Strategy. Paragraph 5.3 of the “Managing the Delivery of Housing Background Paper” – Background Paper 2 notes that “the Council’s Housing Needs Assessment highlights the acute level of affordable housing need within the District and it is noted that the main means of achieving affordable housing delivery is by the means of the construction of market housing...” Paragraph 6.11 of the same document goes onto confirm that “on this basis, the assessment has identified an annual affordable housing need of 812 in Wealden”. On the basis that the delivery of affordable housing, as accepted by the Council is predicated on the delivery of market accommodation, the evidence supports a much higher level of growth than that envisaged by paragraphs 3.8 – 3.17 and more importantly policies WCS1 and WCS2 of the consultation document. Indeed, it is obvious from the above that a target of 4,685 new homes over the period 2006 – 2026 is neither robust or indeed accurate and would continue to exacerbate the ongoing chronic housing deficiencies in the district. Furthermore, paragraph 3.22 of BP1 is of course, wholly misleading as it compares housing target figures that relate to two different time periods. The 11,000 dwellings target relates to the housing requirement set out in SEP between the period 2006 and 2026 (i.e. equal to 550 dwellings per annum), whereas the Council’s reduced figure of 9,600 dwellings relates to an extended 4 year period between 2006 – 2030 which would be the equivalent of 400 dwellings per annum (i.e. a reduction of 150 dwellings per annum over the entire Plan period compared to the SEP). Thus, not only is the PSCS DPD not legally compliant in failing to be in accordance with the Development Plan (or its time period), but also it is not sound, as no satisfactory justification has been provided for the substantial reduction in the housing period and over an extended plan period. Moreover, no justification has been made as to why the council fails to take on board the evidence which clearly supports a higher housing provision than that proposed within the adopted RSS, particularly taking on board the Governments growth agenda.

**Details of Changes to be Made:**

We therefore suggest that the submitted Core strategy needs to be amended to take into the account the extant development plan, including the South East Plan’s housing target at the very least, but with a recognition for a higher level of growth should be planned for. At the very least therefore, there needs to be a larger degree of flexibility built into the document. Whilst the Council has within paragraphs 5.18 – 5.20, as well as policy WCS5 sought to provide a contingency within the document, this does not go far enough and needs to be far more robust to take account, as indentified above of the chronic affordable housing issues that exist within the District.
### Representation ID
1347

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<th>Mr Richardson</th>
<th>Agent ID</th>
<th>3.14</th>
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<th>Legally Compliant</th>
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#### Details of Reasons for Soundness/ Legal Complaince:

We are intrigued by the Council’s intended adoption of an unsound housing position. The Council’s proposals for the provision of housing development during the period 2006 – 2030 demonstrate that the Council’s Local Development Framework Document is not in conformity with the Regional Spatial Strategy, which forms part of the Development Plan. Paragraph 3.3 of the Council’s Background Paper no. 1 (BP1) states “Current legislation requires that the Core Strategy is in general conformity with the Regional Spatial Strategy, the South East Plan” (SEP), which was adopted in May 2009. In paragraph 3.3 of BP1, the Council also acknowledge that “The South East Plan requires that at least 11,000 dwellings is provided in Wealden District between 2006 and 2026”. The SEP (Policy H1) requires 11,000 new dwellings to be provided in Wealden District between 2006 and 2026, equal to an overall annual requirement of 550 per year. Paragraph 3.3 of the Council’s BP1 states “Because of existing planning permissions and houses that have already been built since 2006, overall we need to find locations for a total of approximately 7,000 new houses between now and 2026”. Assuming 550 dwellings per year based on the SEP housing requirement, extending the PSCS DPD end date to 2030 (i.e. 4 more years) would require an additional 2,200 dwellings, bringing this total to the equivalent of 9,200 dwellings between 2006 and 2030. Policy WCS2 indicates that 4,889 dwellings are already committed (through planning permissions, commencements etc.) as at 1st April 2010. Set against the SEP requirement, this would leave a residual requirement for 6,111 dwellings up to 2026 (i.e. 11,000 minus 4,889) and if the SEP requirement were to be extended by 4 years up to 2030 (at 550 dwellings per year i.e. a total of 2,200 dwellings), this would create a total residual requirement of 8,311 additional dwellings by 2030. This residual requirement is the equivalent of 415 dwellings per annum during the remaining 20 year period between April 2010 and April 2030. By contrast, draft Policy WCS1 provides for a total provision of 9,600 dwellings between 2006 and 2030. Taking account of 4,889 dwelling commitments, this leaves only 4,711 new dwellings during the remaining 20 year period. This is the equivalent of only 230 dwellings per year (i.e. just over half that implied by extending the annual housing requirement set out in Policy H1 of the SEP to 2030). In draft Policy WCS2, the 9,600 dwelling figure referred to in draft Policy WCS1 has a total of 9,574 dwellings during the same 2006 – 2030 time period. The Council has not provided any justification for failing to comply with the housing requirements set out in SEP and no justification has been provided as to how the seemingly speculative figure of 9,600 dwellings or 9,574 dwellings has been arrived at for the housing requirement during the period 2006 – 2030 in draft Policies WSC1 and WSC2. As the council are aware there have been a number of recent announcements regarding the emerging Localism Bill and the changes being sought by the Government and we have looked to deal with these within our comments. As the Council is aware, Section 19 of the Planning and Compulsory Purchase Act 2004 (as amended) deals with the Preparation of local development documents. Section 19(2) specifically states that: “In preparing a Development Plan Document or any other local development document the local planning authority must have regard to (a) national policies and advice contained in guidance issued by the Secretary of State; (b) the RSS for the region in which the area of the authority is situated, if the area is outside Greater London”; (h) any other local development document which has been adopted by the authority”. The adopted South East Plan therefore remains part of the development plan and whatever the Council believes cannot be used as a reason for not complying with 19(2)(b) as this is a statutory requirement. This is particularly true bearing in mind recent appeal decisions, which confirm the status of the RSS’s and the limited weight that can be attributed at this time to the emerging Localism Bill. Accordingly any DPD that appears prior to enactment of the Localism Bill which materially departs from the RSS must be found unsound given that it would not comply with statute, particularly given the Governments recent announcement that an Environmental Assessment will now be carried out to consider the removal of the RSS’s. By any reasonable standard, this is likely to take a long period of time and it is therefore fair to assume the RSS’s will remain as part of the development plan for a good period to come. Nonetheless, even ignoring the above the Government remains committed to the delivery of more housing and it therefore seems perverse for the council to be attempting to adopt a strategy which seeks to reduce what should be recognised at the very least, as a minimum housing requirement. It is clear from all the above therefore that the RSS remains in law as part of the development plan and cannot be ignored, as the council appears to be seeking to do. We also refer the council back to the founding principles of the emerging local development framework. For example PPS 12 confirms that the Core Strategies; “4.36 Core strategies must be justifiable: they must be: • founded on a robust and credible evidence base; and • the most appropriate strategy when considered against the reasonable alternatives”. We question whether the council’s unjustified Housing Growth figures meet this simple test as presently emerging and we maintain therefore that the Councils emerging Core Strategy is not only deficient because it ignores the
adopted RSS, but it also not founded on the most up to date evidence base. Perhaps, however most importantly we draw the council’s attention to the evidence base it has at its disposal and indeed comments it makes in supporting documents for this Core Strategy. Paragraph 5.3 of the “Managing the Delivery of Housing Background Paper” – Background Paper 2 notes that “the Councils Housing Needs Assessment highlights the acute level of affordable housing need within the District and it is noted that the main means of achieving affordable housing delivery is by the means of the construction of market housing…” Paragraph 6.11 of the same document goes onto confirm that “on this basis, the assessment has identified an annual affordable housing need of 812 in Wealden”. On the basis that the delivery of affordable housing, as accepted by the Council is predicated on the delivery of market accommodation, the evidence supports a much higher level of growth than that envisaged by paragraphs 3.8 – 3.17 and more importantly policies WCS1 and WCS2 of the consultation document. Indeed, it is obvious from the above that a target of 4,685 new homes over the period 2006 – 2026 is neither robust or indeed accurate and would continue to exacerbate the ongoing chronic housing deficiencies in the district. Furthermore, paragraph 3.22 of BP1 is of course, wholly misleading as it compares housing target figures that relate to two different time periods. The 11,000 dwellings target relates to the housing requirement set out in SEP between the period 2006 and 2026 (i.e. equal to 550 dwellings per annum), whereas the Council’s reduced figure of 9,600 dwellings relates to an extended 4 year period between 2006 – 2030 which would be the equivalent of 400 dwellings per annum (i.e. a reduction of 150 dwellings per annum over the entire Plan period compared to the SEP). Thus, not only is the PSCS DPD not legally compliant in failing to be in accordance with the Development Plan (or its time period), but also it is not sound, as no satisfactory justification has been provided for the substantial reduction in the housing period and over an extended plan period. Moreover, no justification has been made as to why the council fails to take on board the evidence which clearly supports a higher housing provision than that proposed within the adopted RSS, particularly taking on board the Governments growth agenda.

Details of Changes to be Made:
We therefore suggest that the submitted Core strategy needs to be amended to take into the account the extant development plan, including the South East Plan’s housing target at the very least, but with a recognition for a higher level of growth should be planned for. At the very least therefore, there needs to be a larger degree of flexibility built into the document. Whilst the Council has within paragraphs 5.18 – 5.20, as well as policy WCS5 sought to provide a contingency within the document, this does not go far enough and needs to be far more robust to take account, as indentified above of the chronic affordable housing issues that exist within the District.

Representation ID
1265
Person ID Mr Webster
Agent ID 534840
Paragraph 3.14

Sound ☑ Yes ☑ No ☑ Justified ☑ Effective ☑ Consistent with national policy
Legally Compliant ☑ Yes ☑ No

Details of Reasons for Soundess/ Legal Complaince:
1.1 The Council states that the Core Strategy intends that a total of around 9,600 dwellings will be created in the period 2006 - 2040. This is made up as follows. Houses already built (to April 2010) 1331 Existing commitments 3558 Proposed Additional Housing 4685 Total 9579 1.2 paragraph 3.10 of the Porposed Submission Core Strategy states that the Council expects the population of the district to increase between 2006 and 2030 by approximately 19,000 which represents 16,800 households. It is clear therefore that the number of new households likely to be created in the district over the plan period will be far in excess of the number of new dwellings planned. Even if all the new dwellings proposed are delivered this will only meet the needs of 57% of the expected new households. Well over 7,000 households will remain in housing need.

Details of Changes to be Made:
On this basis the Core Strategy is unsound because the numbers of dwellings proposed to be deliverd does not properly reflect the expected housing need. A larger number of dwellings should be planned for in Policy WCS1 to redress the shortfall in District-wide housing allocations. the total should be closer to the number of new households expected to be created over the plan period.
Paragraph 3.14

Details of Reasons for Soundness/ Legal Compliance:
The Council states that the Core Strategy intends that a total of around 9,600 dwellings will be created in the period 2006 - 2040. This is made up as follows: Houses already built (to April 2010) 1331 Existing commitments 3558 Proposed additional housing 4685 Total 9579. Paragraph 3.10 of the Proposed Submission Core Strategy states that the Council expects the population of the District to increase between 2006 and 2030 by approximately 19,000 which represents 16,800 households. It is clear therefore that the number of new households likely to be created in the district over the plan period will be far in excess of the number of new dwellings planned. Even if all the new dwellings proposed are delivered this will only meet the needs of 57% of the expected new households. Well over 7,000 households will remain in housing need. Due to the size of additional appendices they have not been uploaded but are available to view at the Council's offices.

Details of Changes to be Made:
3. On this basis the Core Strategy is unsound because the numbers of dwellings that are proposed to be delivered does not properly reflect the expected housing need. A larger number of dwellings should therefore be planned for in Policy WCS1 to redress the shortfall in District-wide housing allocations. The total should be closer to the number of new households expected to be created over the plan period.

Details of Reasons for Soundness/ Legal Compliance:
The Council states that the Core Strategy intends that a total of around 9,600 dwellings will be created in the period 2006 - 2040. This is made up as follows: Houses already built (to April 2010) 1331 Existing commitments 3558 Proposed additional housing 4685 Total 9579. Paragraph 3.10 of the Proposed Submission Core Strategy states that the Council expects the population of the District to increase between 2006 and 2030 by approximately 19,000 which represents 16,800 households. It is clear therefore that the number of new households likely to be created in the district over the plan period will be far in excess of the number of new dwellings planned. Even if all the new dwellings proposed are delivered this will only meet the needs of 57% of the expected new households. Well over 7,000 households will remain in housing need. Due to the size of additional appendices they have not been uploaded but are available to view at the Council's offices.

Details of Changes to be Made:
3. On this basis the Core Strategy is unsound because the numbers of dwellings that are proposed to be delivered are deficient and do not properly reflect the expected housing need. A larger number of dwellings should therefore be planned for in Policy WCS1 to redress the shortfall in District-wide housing allocations.
Paragraph 3.14
Details of Reasons for Soundess/ Legal Complaince:
1 The Council states that the Core Strategy intends that a total of around 9,600 dwellings will be created in the period 2006 to 2030. This is made up as follows: Houses already built (to April 2010) 1331 Existing commitments 3558 Proposed Additional Housing 4685 TOTAL 9579 2 Paragraph 3.10 of the Proposed Submission Core Strategy states that the Council expects the population of the district to increase between 2006 and 2030 by approximately 19,000, which represents 16,800 households. It is clear therefore that the number of new households likely to be created in the district over the plan period will be far in excess of the number of new dwellings planned. Even if all of the new dwellings proposed are delivered this will only meet the needs of 57% of the expected new households. Well over 7,000 households will remain in housing need. 3 On this basis the Core Strategy is unsound because the numbers of dwellings proposed to be delivered does not properly reflect the expected housing need. A larger number of dwellings should be planned for in Policy WCS1 to redress the shortfall in District-wide housing allocations. The total should be closer to the number of new households expected to be created over the plan period.

Details of Changes to be Made:
The total number of dwellings to be provided should be increased, with significantly more housing development being identified in the north of the District where the market is stronger and a known need for housing exists.

Paragraph 3.14
Details of Reasons for Soundess/ Legal Complaince:
The Number of Dwelling Proposed to be delivered. (Paragraphs 3.8 – 3.17, Policy WCS1) 1 The Council states that the Core Strategy intends that a total of around 9,600 dwellings will be created in the period 2006 to 2030. This is made up as follows: Houses already build (to April 2010) 1331 Existing commitments 3558 Proposed Additional Housing 4685 TOTAL 9579 2 Paragraph 3.10 of the Proposed Submission Core Strategy states that the Council expects the population of the District to increase between 2006 and 2030 by approximately 19,000, which represents 16,800 households. It is clear therefore that the number of new households likely to be created in the district over the plan period will be far in excess of the number of new dwellings planned. Even if all of the new dwellings proposed are delivered this will only meet the needs of 57% of the expected new households. Well over 7,000 households will remain in housing need.

Details of Changes to be Made:
2 Paragraph 3.10 of the Proposed Submission Core Strategy states that the Council expects the population of the District to increase between 2006 and 2030 by approximately 19,000, which represents 16,800 households. It is clear therefore that the number of new households likely to be created in the district over the plan period will be far in excess of the number of new dwellings planned. Even if all of the new dwellings proposed are delivered this will only meet the needs of 57% of the expected new households. Well over 7,000 households will remain in housing need.
### Representation ID 450

**Person ID** 104870  
**Agent ID** Campaign for Better Transport

**Paragraph** 3.14

**Sound** Yes  
**Legally Compliant** Yes

**Details of Reasons for Soundess/ Legal Complaince:**

Policies to restrain traffic, obtain modal shift in travel, reducing need to travel and improve the experience of non-car travel need to be sharpened and focused. Aspirations for these to happen must have necessary circumstances incorporated into the policies.

**Details of Changes to be Made:**

Demand management techniques for traffic in Hailsham (6.15) should be included in all the related and equivalent policies. There should be a definite commitment to traffic reduction measures and targets throughout the Strategy Plan document.

### Representation ID 1634

**Person ID** 107745  
**Agent ID** Mrs Jennifer Owen & Associates Ltd.

**Paragraph** 3.14

**Sound** Yes  
**Legally Compliant** Yes

**Details of Reasons for Soundess/ Legal Complaince:**

"Supplementary documents have been submitted but not attached, and may be viewed at the Council offices on request".

**Details of Changes to be Made:**

REVISION SOUGHT Amend to reflect increased number of dwellings at uckfield to 1,450.
Details of Reasons for Soundess/ Legal Complaince:
The Benhall Mill Road Land Association, local residents and TWBC have objected since 2004 to Wealden during previous consultations, all the points raised in those previous consultations still apply. The areas under consideration in the Wealden district in the border area between Tunbridge Wells and Wealden referred to as the rural Frant Parish and outlined in the Wealden SHLAA, site ref 126/1610 and 059/1610 and the 063/1610 are not suitable for possible housing development. Housing development in these areas do not serve the Wealden community but firmly place the housing burden upon the neighbouring borough Tunbridge Wells. The nearest Wealden settlements, Bells Yew Green and Frant are too far away to offer any infrastructure, support or any community provision. Urban extension of these areas are not urban extensions of Wealden settlements but extensions to Tunbridge Wells with no contributions, provisions or discussions with the neighbouring authority. Section 106 agreements would have to be in place and agreements with TWBC would have to be made to contribute to the infrastructure in Tunbridge Wells to serve any possible residents in the Frant rural fringe area. Development proposals by Wealden in these areas are opposed by TWBC. The possible housing numbers as indicated in the Wealden SHLAA of 140 could significantly effect the housing strategies of TWBC. The wider housing needs of Wealden should be firmly located to Wealden's established settlements. The nearest Wealden Settlements are small and provide very little infrastructure and as a result any residents would look to Tunbridge Wells for their needs and services. The site 063/1610 has been deemed unsuitable by Wealden, the area was not adopted into any Wealden development plan or strategy and that has not stopped a developer attempting to bring the area forward for development. Recent comments, we assume by an interested party has questioned the continued SNCI status of the 063/1610 site, so they are still intent on the site being available for adoption and still have development ideas. This area if it were to be pushed by a developer would present housing in addition to the 140 stated in the Wealden SHLAA. The other two proposed areas may be open to earlier development pressure if adopted into the Wealden LDF. The Wealden SHLAA suggests the areas mentioned above, would not be developed until 2028. The owner/developer could move forward at any time without having the obstacle off justifying a development on land which is not allocated for possible development. To afford the area protection against development the areas in the Tunbridge Wells/ Frant rural fringe area should remain outside of any adopted plan. Wealden's should ensure that all possible housing development sites that are better located in their district are developed before the Frant Parish rural area is even considered for development. Traffic impact on the already congested and busy Tunbridge Wells roads would be significant with 140 houses. The Kent Highways Authority and Sussex Highways would have to make a full assessment ahead of any development also taking into account possible housing developments in the adjacent borough that will also impact on the area. Any proposed development site adjacent to Tunbridge Wells should be subject to stringent checks and assessment to determine if development is sustainable.

Details of Changes to be Made:
The rural area in the Parish of Frant adjacent to Tunbridge Wells is unsuitable for development because it impacts on the neighbouring borough Tunbridge Wells, and housing development in this area does not serve the Wealden community.
Summary of all Representations - Proposed Submission Core Strategy Regulation 27 - Report 11th July 2011

Representation ID
1248
Person ID Dekl 344781
Agent ID Mr Nightingale 102571
Kember Loudon Williams

Paragraph 3.15
Sound ☐ No ☑ Yes ☑ Justified ☑ Effective ☐ Consistent with national policy
Legally Compliant ☐ Yes ☐ No

Details of Reasons for Soundess/ Legal Complaince:
The Council states that the Core Strategy intends that a total of around 9,600 dwellings will be created in the period 2006 - 2040. This is made up as follows. Houses already built (to April 2010) 1331 Existing commitments 3558 Proposed Additional Housing 4685 Total 9579 2. paragraph 3.10 of the Porposed Submission Core Strategy states that the Council expects the population of the district to increase between 2006 and 2030 by approximately 19,000 which represents 16,800 households. It is clear therefore that the number of new households likely to be created in the district over the plan period will be far in excess of the number of new dwellings planned. Even if all the new dwellings proposed are delivered this will only meet the needs of 57% of the expected new households. Well over 7,000 households will remain in housing need. 3. On this basis the Core Strategy is unsound because the numbers of dwellings proposed to be deliverd does not properly reflect the expected housing need. A larger number of dwellings should be planned for in Policy WCS1 to reddress the shortfall in District-wide housing allocations. the total should be closer to the number of new households expected to be created over the plan period.

Details of Changes to be Made:
The total number of dwellings to be provided should be increased, with significantly more housing development being identified in the north of the district where the market is stronger and a known need for housing exists.

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Representation ID
1266
Person ID Mr Webster 534840
Agent ID

Paragraph 3.15
Sound ☑ Yes ☑ Justified ☑ Effective ☑ Consistent with national policy
Legally Compliant ☑ Yes ☐ No

Details of Reasons for Soundess/ Legal Complaince:
1.1 The Council states that the Core Strategy intends that a total of around 9,600 dwellings will be created in the period 2006 - 2040. This is made up as follows. Houses already built (to April 2010) 1331 Existing commitments 3558 Proposed Additional Housing 4685 Total 9579 1.2 paragraph 3.10 of the Porposed Submission Core Strategy states that the Council expects the population of the district to increase between 2006 and 2030 by approximately 19,000 which represents 16,800 households. It is clear therefore that the number of new households likely to be created in the district over the plan period will be far in excess of the number of new dwellings planned. Even if all the new dwellings proposed are delivered this will only meet the needs of 57% of the expected new households. Well over 7,000 households will remain in housing need. 3. On this basis the Core Strategy is unsound because the numbers of dwellings proposed to be deliverd does not properly reflect the expected housing need. A larger number of dwellings should be planned for in Policy WCS1 to reddress the shortfall in District-wide housing allocations. the total should be closer to the number of new households expected to be created over the plan period.

Details of Changes to be Made:
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We are intrigued by the Councils intended adoption of an unsound housing position. The Council’s proposals for the provision of housing development during the period 2006 – 2030 demonstrate that the Council’s Local Development Framework Document is not in conformity with the Regional Spatial Strategy, which forms part of the Development Plan. Paragraph 3.3 of the Council’s Background Paper no. 1 (BP1) states “Current legislation requires that the Core Strategy is in general conformity with the Regional Spatial Strategy, the South East Plan” (SEP), which was adopted in May 2009. In paragraph 3.3 of BP1, the Council also acknowledge that “The South East Plan requires that at least 11,000 dwellings is provided in Wealden District between 2006 and 2026”. The SEP (Policy H1) requires 11,000 new dwellings to be provided in Wealden District between 2006 and 2026, equal to an overall annual requirement of 550 per year. Paragraph 3.3 of the Council’s BP1 states “Because of existing planning permissions and houses that have already been built since 2006, overall we need to find locations for a total of approximately 7,000 new houses between now and 2026”. Assuming 550 dwellings per year based on the SEP housing requirement, extending the PSCS DPD end date to 2030 (i.e. 4 more years) would require an additional 2,200 dwellings, bringing this total to the equivalent of 9,200 dwellings between 2006 and 2030. Policy WCS2 indicates that 4,889 dwellings are already committed (through planning permissions, commencements etc.) as at 1st April 2010. Set against the SEP requirement, this would leave a residual requirement for 6,111 dwellings up to 2026 (i.e. 11,000 minus 4,889) and if the SEP requirement were to be extended by 4 years up to 2030 (at 550 dwellings per year i.e. a total of 2,200 dwellings), this would create a total residual requirement of 8,311 additional dwellings by 2030. This residual requirement is the equivalent of 415 dwellings per annum during the remaining 20 year period between April 2010 and April 2030. By contrast, draft Policy WCS1 provides for a total provision of 9,600 dwellings between 2006 and 2030. Taking account of 4,889 dwelling commitments, this leaves only 4,889 new dwellings during the remaining 20 year period. This is the equivalent of only 230 dwellings per year (i.e. just over half that implied by extending the annual housing requirement set out in Policy H1 of the SEP to 2030). In draft Policy WCS2, the 9,600 dwelling figure referred to in draft Policy WCS1 has a total of 9,574 dwellings during the same 2006 – 2030 time period. The Council has not provided any justification for failing to comply with the housing requirements set out in SEP and no justification has been provided as to how the seemingly speculative figure of 9,600 dwellings or 9,574 dwellings has been arrived at for the housing requirement during the period 2006 – 2030 in draft Policies WSC1 and WSC2. As the council are aware there have been a number of recent announcements regarding the emerging Localism Bill and the changes being sought by the Government and we have looked to deal with these within our comments. As the Council is aware, Section 19 of the Planning and Compulsory Purchase Act 2004 (as amended) deals with the Preparation of local development documents. Section 19(2) specifically states that: “In preparing a Development Plan Document or any other local development document the local planning authority must have regard to (a) national policies and advice contained in guidance issued by the Secretary of State; (b) the RSS for the region in which the area of the authority is situated, if the area is outside Greater London”; (h) any other local development document which has been adopted by the authority”. The adopted South East Plan therefore remains part of the development plan and whatever the Council believes cannot be used as a reason for not complying with 19(2)(b) as this is a statutory requirement. This is particularly true bearing in mind recent appeal decisions, which confirm the status of the RSS’s and the limited weight that can be attributed at this time to the emerging Localism Bill. Accordingly any DPD that appears prior to enactment of the Localism Bill which materially departs from the RSS must be found unsound given that it would not comply with statute, particularly given the Governments recent announcement that an Environmental Assessment will now be carried out to consider the removal of the RSS’s. By any reasonable standard, this is likely to take a long period of time and it is therefore fair to assume the RSS’s will remain as part of the development plan for a good period to come. Nonetheless, even ignoring the above the Government remains committed to the delivery of more housing and it therefore seems perverse for the council to be attempting to adopt a strategy which seeks to reduce what should be recognised at the very least, as a minimum housing requirement. It is clear from all the above therefore that the RSS remains in law as part of the development plan and cannot be ignored, as the council appears to be seeking to do. We also refer the council back to the founding principles of the emerging local development framework. For example PPS 12 confirms that the Core Strategies; “4.36 Core strategies must be justifiable: they must be: • founded on a robust and credible evidence base; and • the most appropriate strategy when considered against the reasonable alternatives”. We question whether the council’s unjustified Housing Growth figures meet this simple test as presently emerging and we maintain therefore that the Councils emerging Core Strategy is not only deficient because it ignores the
adopted RSS, but it also not founded on the most up to date evidence base. Perhaps, however most importantly we draw the council’s attention to the evidence base it has at its disposal and indeed comments it makes in supporting documents for this Core Strategy. Paragraph 5.3 of the “Managing the Delivery of Housing Background Paper” – Background Paper 2 notes that “the Council’s Housing Needs Assessment highlights the acute level of affordable housing need within the District and it is noted that the main means of achieving affordable housing delivery is by the means of the construction of market housing…” Paragraph 6.11 of the same document goes onto confirm that “on this basis, the assessment has identified an annual affordable housing need of 812 in Wealden”. On the basis that the delivery of affordable housing, as accepted by the Council is predicated on the delivery of market accommodation, the evidence supports a much higher level of growth than that envisaged by paragraphs 3.8 – 3.17 and more importantly policies WCS1 and WCS2 of the consultation document. Indeed, it is obvious from the above that a target of 4,685 new homes over the period 2006 – 2026 is neither robust or indeed accurate and would continue to exacerbate the ongoing chronic housing deficiencies in the district. Furthermore, paragraph 3.22 of BP1 is of course, wholly misleading as it compares housing target figures that relate to two different time periods. The 11,000 dwellings target relates to the housing requirement set out in SEP between the period 2006 and 2026 (i.e. equal to 550 dwellings per annum), whereas the Council’s reduced figure of 9,600 dwellings relates to an extended 4 year period between 2006 – 2030 which would be the equivalent of 400 dwellings per annum (i.e. a reduction of 150 dwellings per annum over the entire Plan period compared to the SEP). Thus, not only is the PSCS DPD not legally compliant in failing to be in accordance with the Development Plan (or its time period), but also it is not sound, as no satisfactory justification has been provided for the substantial reduction in the housing period and over an extended plan period. Moreover, no justification has been made as to why the council fails to take on board the evidence which clearly supports a higher housing provision than that proposed within the adopted RSS, particularly taking on board the Governments growth agenda.

**Details of Changes to be Made:**

We therefore suggest that the submitted Core strategy needs to be amended to take into the account the extant development plan, including the South East Plan’s housing target at the very least, but with a recognition for a higher level of growth should be planned for. At the very least therefore, there needs to be a larger degree of flexibility built into the document. Whilst the Council has within paragraphs 5.18 – 5.20, as well as policy WCS5 sought to provide a contingency within the document, this does not go far enough and needs to be far more robust to take account, as identified above of the chronic affordable housing issues that exist within the District.
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We are intrigued by the Councils intended adoption of an unsound housing position. The Council’s proposals for the provision of housing development during the period 2006 – 2030 demonstrate that the Council’s Local Development Framework Document is not in conformity with the Regional Spatial Strategy, which forms part of the Development Plan. Paragraph 3.3 of the Council’s Background Paper no. 1 (BP1) states “Current legislation requires that the Core Strategy is in general conformity with the Regional Spatial Strategy, the South East Plan” (SEP), which was adopted in May 2009. In paragraph 3.3 of BP1, the Council also acknowledge that “The South East Plan requires that at least 11,000 dwellings is provided in Wealden District between 2006 and 2026”. The SEP (Policy H1) requires 11,000 new dwellings to be provided in Wealden District between 2006 and 2026, equal to an overall annual requirement of 550 per year. Paragraph 3.3 of the Council’s BP1 states “Because of existing planning permissions and houses that have already been built since 2006, overall we need to find locations for a total of approximately 7,000 new houses between now and 2026”. Assuming 550 dwellings per year based on the SEP housing requirement, extending the PSCS DPD end date to 2030 (i.e. 4 more years) would require an additional 2,200 dwellings, bringing this total to the equivalent of 9,200 dwellings between 2006 and 2030. Policy WCS2 indicates that 4,889 dwellings are already committed (through planning permissions, commencements etc.) as at 1st April 2010. Set against the SEP requirement, this would leave a residual requirement for 6,111 dwellings up to 2026 (i.e. 11,000 minus 4,889) and if the SEP requirement were to be extended by 4 years up to 2030 (at 550 dwellings per year i.e. a total of 2,200 dwellings), this would create a total residual requirement of 8,311 additional dwellings by 2030. This residual requirement is the equivalent of 415 dwellings per annum during the remaining 20 year period between April 2010 and April 2030. By contrast, draft Policy WCS1 provides for a total provision of 9,600 dwellings between 2006 and 2030. Taking account of 4,889 dwelling commitments, this leaves only 4,685 new dwellings during the remaining 20 year period. This is the equivalent of only 230 dwellings per year (i.e. just over half that implied by extending the annual housing requirement set out in Policy H1 of the SEP to 2030). In draft Policy WCS2, the 9,600 dwelling figure referred to in draft Policy WCS1 has a total of 9,574 dwellings during the same 2006 – 2030 time period. The Council has not provided any justification for failing to comply with the housing requirements set out in SEP and no justification has been provided as to how the seemingly speculative figure of 9,600 dwellings or 9,574 dwellings has been arrived at for the housing requirement during the period 2006 – 2030 in draft Policies WSC1 and WSC2. As the council are aware there have been a number of recent announcements regarding the emerging Localism Bill and the changes being sought by the Government and we have looked to deal with these within our comments. As the Council is aware, Section 19 of the Planning and Compulsory Purchase Act 2004 (as amended) deals with the Preparation of local development documents. Section 19(2) specifically states that: "In preparing a Development Plan Document or any other local development document the local planning authority must have regard to (a) national policies and advice contained in guidance issued by the Secretary of State; (b) the RSS for the region in which the area of the authority is situated, if the area is outside Greater London”; (h) any other local development document which has been adopted by the authority”. The adopted South East Plan therefore remains part of the development plan and whatever the Council believes cannot be used as a reason for not complying with 19(2)(b) as this is a statutory requirement. This is particularly true bearing in mind recent appeal decisions, which confirm the status of the RSS’s and the limited weight that can be attributed at this time to the emerging Localism Bill. Accordingly any DPD that appears prior to enactment of the Localism Bill which materially departs from the RSS must be found unsound given that it would not comply with statute, particularly given the Governments recent announcement that an Environmental Assessment will now be carried out to consider the removal of the RSS’s. By any reasonable standard, this is likely to take a long period of time and it is therefore fair to assume the RSS’s will remain as part of the development plan for a good period to come. Nonetheless, even ignoring the above the Government remains committed to the delivery of more housing and it therefore seems perverse for the council to be attempting to adopt a strategy which seeks to reduce what should be recognised at the very least, as a minimum housing requirement. It is clear from all the above therefore that the RSS remains in law as part of the development plan and cannot be ignored, as the council appears to be seeking to do. We also refer the council back to the founding principles of the emerging local development framework. For example PPS 12 confirms that the Core Strategies; “4.36 Core strategies must be justifiable: they must be: • founded on a robust and credible evidence base; and • the most appropriate strategy when considered against the reasonable alternatives”. We question whether the council’s unjustified Housing Growth figures meet this simple test as presently emerging and we maintain therefore that the Councils emerging Core Strategy is not only deficient because it ignores the
adopted RSS, but it also not founded on the most up to date evidence base. Perhaps, however most importantly
we draw the council's attention to the evidence base it has at its disposal and indeed comments it makes in
supporting documents for this Core Strategy. Paragraph 5.3 of the “Managing the Delivery of Housing Background
Paper” – Background Paper 2 notes that “the Councils Housing Needs Assessment highlights the acute level of
affordable housing need within the District and it is noted that the main means of achieving affordable housing
delivery is by the means of the construction of market housing...” Paragraph 6.11 of the same document goes
onto confirm that “on this basis, the assessment has identified an annual affordable housing need of 812 in
Wealden”. On the basis that the delivery of affordable housing, as accepted by the Council is predicated on the
delivery of market accommodation, the evidence supports a much higher level of growth than that envisaged by
paragraphs 3.8 – 3.17 and more importantly policies WCS1 and WCS2 of the consultation document. Indeed, it is
obvious from the above that a target of 4,685 new homes over the period 2006 – 2026 is neither robust or indeed
accurate and would continue to exacerbate the ongoing chronic housing deficiencies in the district. Furthermore,
paragraph 3.22 of BP1 is of course, wholly misleading as it compares housing target figures that relate to two
different time periods. The 11,000 dwellings target relates to the housing requirement set out in SEP between the
period 2006 and 2026 (i.e. equal to 550 dwellings per annum), whereas the Council’s reduced figure of 9,600
dwellings relates to an extended 4 year period between 2006 – 2030 which would be the equivalent of 400
dwellings per annum (i.e. a reduction of 150 dwellings per annum over the entire Plan period compared to the
SEP). Thus, not only is the PSCS DPD not legally compliant in failing to be in accordance with the Development
Plan (or its time period), but also it is not sound, as no satisfactory justification has been provided for the
substantial reduction in the housing period and over an extended plan period. Moreover, no justification has been
made as to why the council fails to take on board the evidence which clearly supports a higher housing provision
than that proposed within the adopted RSS, particularly taking on board the Governments growth agenda.

Details of Changes to be Made:
We therefore suggest that the submitted Core strategy needs to be amended to take into the account the extant
development plan, including the South East Plan's housing target at the very least, but with a recognition for a
higher level of growth should be planned for. At the very least therefore, there needs to be a larger degree of
flexibility built into the document. Whilst the Council has within paragraphs 5.18 – 5.20, as well as policy WCS5
sought to provide a contingency within the document, this does not go far enough and needs to be far more robust
to take account, as identified above of the chronic affordable housing issues that exist within the District.

Details of Reasons for Soundess/ Legal Complaince:
The Number of Dwelling Proposed to be delivered. (Paragraphs 3.8 – 3.17, Policy WCS1) 1 The Council states
that the Core Strategy intends that a total of around 9,600 dwellings will be created in the period 2006 to 2030.
This is made up as follows: Houses already build (to April 2010) 1331 Existing commitments 3558 Proposed
Additional Housing 4685 Total 9579

Details of Changes to be Made:
2 Paragraph 3.10 of the Proposed Submission Core Strategy states that the Council expects the population of the
District to increase between 2006 and 2030 by approximately 19,000, which represents 16,800 households. It is
clear therefore that the number of new households likely to be created in the district over the plan period will be far
in excess of the number of new dwellings planned. Even if all of the new dwellings proposed are delivered this will
only meet the needs of 57% of the expected new households. Well over 7,000 households will remain in housing
need.
Paragraph 3.15

Details of Reasons for Soundness/Legal Compliance:

1. The Council states that the Core Strategy intends that a total of around 9,600 dwellings will be created in the period 2006 to 2030. This is made up as follows: Houses already built (to April 2010) 1331 Existing commitments 3558 Proposed additional housing 4685 Total 9579 2. Paragraph 3.10 of the Proposed Submission Core Strategy states that the Council expects the population of the district to increase between 2006 and 2030 by approximately 19,000, which represents 16,800 households. It is clear therefore that the number of new households likely to be created in the district over the plan period will be far in excess of the number of new dwellings planned. Even if all of the new dwellings proposed are delivered this will only meet the needs of 57% of the expected new households. Well over 7,000 households will remain in housing need. 3. On this basis the Core Strategy is unsound because the numbers of dwellings proposed to be delivered does not properly reflect the expected housing need. A larger number of dwellings should therefore be planned for in Policy WCS1 to redress the shortfall in District-wide housing allocations. The total should be closer to the number of new households expected to be created over the plan period.

Details of Changes to be Made:

The total number of dwellings to be provided should be increased, with significantly more housing development being identified in the north of the District where the market is stronger and a known need for housing exists.

Sound □ Yes ✔ No ✔ Justified ✔ Effective □ Consistent with national policy
Legally Compliant □ Yes □ No
Details of Reasons for Soundess/ Legal Complaince:
The sites under consideration are situated off a country lane which would not be able to cope with anything like the construction traffic or subsequent residents' traffic that would result from anything other than a small scale development of a few houses. Similarly, the local infrastructure (e.g. schools, emergency services, drainage etc) are inadequate to support any material development in this area. The nearest school, Claremont, is currently greatly oversubscribed and would be unable to accommodate an influx of any pupils of any scale. The land is right on the edge of the Wealden boundary with Tunbridge Wells and would result in a totally unwarranted (and unwanted) expansion of Tunbridge Wells – you would in effect be creating a problem for a neighbouring town / council that does not want to see its urban fringe creeping further outwards. I understand that Tunbridge Wells Borough Council are also making known their views to this end. There are also substantial environmental concerns, with one of the possible sites having previously used as a rubbish tip which would require substantial contamination remediation works to make it suitable for any housing. The rest of the area is primarily rural / agricultural, supporting many species of plant and animal life which would be lost if any substantial development were to be permitted.

Details of Changes to be Made:
Remove any references in the Core Strategy to potential development on the Tunbridge Wells fringe

Details of Reasons for Soundess/ Legal Complaince:
Tunbridge Wells is already overloaded with regard to access to schools, especially primary, and medical services. Traffic is also a problem in the town and adding additional traffic load on an area not in Wealden to support Wealden population would seem rather cynical. Any developments should be closer to Wealden centres of population, where urban support services can be provided and suffer the traffic consequences.

Details of Reasons for Soundess/ Legal Complaince:
We are pleased that the constraints of the Hailsham waste water treatment works and potential impacts on Pevensey Levels have been recognised and taken into consideration within the document.

Details of Changes to be Made:
Paragraph 3.16

Details of Reasons for Soundness/Legal Compliance:
Generally support the strategy with the exception of including Stone Cross as a location for sustainable new development. Stone Cross is not a sustainable location or solution it comprises essentially a dormitory settlement providing a workforce to Eastbourne, Hailsham and surrounding areas that relies on the facilities in surrounding settlements such as Hailsham and Eastbourne

Details of Changes to be Made:
delete reference to Stone Cross
1. The Amount of New Housing – Policy WCS1 and WCS2 and paragraphs 5.3 etc 1.1.1 We note that the proposed Submission Core Strategy looks to accommodate 9574 new dwellings in the district across the plan period (2006 – 2030) i.e. 399 a year. This is circa 27.5% less than the 11,000 dwellings proposed across the district in the South East Plan (SEP) (May 2009) for the period 2006 and 2026. 1.1.2 PPS12 requires Core Strategies to conform generally to the regional policy. We do not consider the amount of new housing proposed in the district to be legally compliant as it is not consistent with regional policy as set out in the SEP. 1.1.3 Whilst the LPA appear to be progressing with a lower level of growth on the assumption that the SEP will be revoked by the time the Core Strategy gets to examination, the fact is the SEP remains part of the development plan at present and the CS should have regard to the aims and objectives of the SEP/ justify why it is necessary and appropriate to depart from it. The proposed Submission Core Strategy contains no such justification. 1.1.4 A detailed understanding of the background to the amount of new housing proposed in the district in the SEP is in our opinion important in considering the soundness of the housing land supply strategy now being advocated in the proposed Submission Core Strategy document. 1.1.15 The Chief Planning Officer (CPO) in his letter of the 6th July made it clear that in the context of the revocation of the RSS LPAs would be responsible for determining the housing numbers in the absence of a regional target, and that the housing numbers promoted by LPAs would need to be justified, as LPAs would need to defend them through the LDF examination process. 1.1.19 The District Council has an obligation to assess and provide for the housing needs and demands of the District. Paragraph 33 of PPS3 makes it very clear that in determining local levels of housing provision local planning authorities should, in preparing their Core Strategies take into account evidence of current and future levels of housing need and demand, e.g. as set out in Housing Market Assessment and the Housing Needs Assessment. 1.1.22 Having regard to the above we feel the DC should give consideration to the accommodation of at least 13,200 (i.e. the 11,000 set out in the SEP plus 4 x 550) to cover the additional years to 2030). Given the 4,889 units are already committed this would leave a residual requirement of 8,311 i.e. a residual requirement equivalent to 415 dwellings pa. If, 75% of the 13,200 units were on sites that generated an affordable housing need under the new policy WCS8, this level of provision could provide for circa 3,465 affordable dwellings i.e. 18% of the affordable need identified in the HNA. Which demonstrates how severe the need is relative to the supply 1.1.23 WDC’s aversion to higher housing numbers appears to be related to the effect these could have on infrastructure and services, especially in the southern part of the district. However, it is often the case that the strategic housing allocations help to address this issue, providing new transport links/highway improvements, contributing to new sustainable drainage facilities, new schools, medical facilities etc. Higher levels of growth need not prejudice existing infrastructure and services; they could in fact help address existing problems. 1.2 Housing Distribution 1.2.1 We do not consider the housing distribution strategy to be legally compliant. It is not consistent with regional policy as set out in the SEP. PPS12 requires Core Strategies to conform generally to the regional policy. Paragraph 4.33 states that choices to be made on where growth should take place should follow national and regional policy. 1.2.2 The southern part of Wealden district is located within the Sussex Coast Sub Region, one of the nine sub regions identified in the SEP. These sub regions were to be ‘the focus for growth and regeneration’. Policy SP1 of the SEP refers 1.2.3 Policy H1 of the SEP deals with regional housing provision. It stipulates that in the Sussex Coast Sub Region, 69,300 net additional dwellings should be provided between 2006 and 2026. 1.2.4 Policy SCT5 of the SEP sets out the scale and distribution of housing across the Sussex Coast sub region. It indicates that that part of Wealden District which falls within the Sussex Coast Sub Region should seek to accommodate 7000 dwellings during the plan period (2006 – 2026) i.e. 350 dwellings per annum. 1.2.5 Given the above, and having regard to the requirements of policy H1b of the SEP (wherein WDC are required to provide some 11,000 units across the district during the plan period (2006-2026)), it is clear that the SEP looks to focus growth within that part of the district that falls within the Sussex Coast Sub Region, with only a small proportion of development (4000 homes) to be accommodated within what was called the Rest of the District. 1.2.6 The SEP also makes it clear that the Sussex Coast Sub Region was identified as an area where the government was looking to proactively pursue and promote economic growth and regeneration. As a result over 60% of WDC’s housing requirement was located within the Sussex Coast Sub Region. The spatial strategy being promoted in the proposed Submission Core Strategy document is, according to paragraph 5.5 of the proposed Submission Core 493/A3/JA April 2011 Strategy document, predicated upon the strategy objectives and the settlement hierarchy. Thus only circa 51% of the proposed level of housing growth is to be located within what was referred to as the Sussex Coast Sub Region in the SEP. 1.2.7 Not only is the spatial strategy inconsistent with the SEP, but it fails to take on board the reason for
the spatial strategy proposed in the SEP i.e. the economic regeneration of the Sussex coastal area. WDC have, in their sustainability appraisal of the proposed Submission Core Strategy Document failed to assess the implications of the spatial strategy advocated in the proposed Submission Core Strategy Document on the economic regeneration of the Sussex coastal area. The council’s failure to undertake this work means that the proposed Submission Core Strategy Document is not soundly based. 1.2.9 In promoting an annual housing requirement of just 400 units WDC, in their proposed Submission Core Strategy document, are in our opinion actively stifling economic growth. Furthermore, the council’s decision to treat the whole district as a single entity, with no emphasis placed on the regeneration of the Sussex Coast Sub Region, is in our opinion, despite the aspirations of policies SP03, 04 and 06, actively prejudicing the economic regeneration of the coastal area, to the detriment of the wider area. 1.2.11 As currently drafted the housing distribution strategy advocated by WDC in their Proposed Submission Core Strategy is not in ‘general conformity’ with the RSS as required by Paragraph 4.2 and 4.33 of PPS12 and is not therefore sound.

Details of Changes to be Made:

3.1 The Amount of New Housing:- 3.1.1 We feel the housing targets set out in policy WCS1 should having regard to our position on the scale of housing growth be amended from 9600 to 13,200 dwellings. 3.1.2 Similarly we feel the housing targets set out in policy WCS2 of the CS should, having regard to our position on the scale of housing growth, the spatial strategy, and the level of housing proposed in Stone Cross specifically, be amended thus:-

WCS2 Distribution of Housing Growth 2006 – 2030 Town/ settlement Stone Cross and Westham 42 Built or already committed - 980 New allocations; total dwellings 2006 - 2030 1,022. Total Wealden 4,889 Built or already committed; 8,311 new allocations; 13,200 Total Dwellings 2006 - 2030. 3.1.3 We would also suggest that the number of new allocations is revised to ensure that 60% of the proposed growth is located in the Sussex Coast Sub Region, as per the SEP, which should be identified on a plan. 3.1.4 Having regard to the above there would also be a need to amend policy SPO3 to address the increase in housing supply we advocate, and the reinstatement of the Sussex Coast Sub Region. Similarly paragraphs 3.11 and 3.16 would need to be revised to reflect our position, with the economic policies (SPO6 and WSC3 reviewed accordingly).

3.1.5 If the scale of housing proposed during the plan period is not revised as recommended, we would suggest that policy WCS2 is revised thus:-

WCS2 Distribution of Housing Growth 2006 – 2030 Town/ settlement Stone Cross and Westham 42 Built or already committed - 850 New allocations; total dwellings 2006 - 2030 892. Total Wealden 4,889 Built or already committed; 4,835 new allocations; 9,724 Total Dwellings 2006 - 2030. 3.1.6 Given our recommended changes to the scale of growth proposed at Stone Cross and Westham we would also recommend that paragraph 6.31 (3) and paragraph 6.31 (3 bullet points 3, and 4 be amended thus:- ‘allocating a range of deliverable housing sites for up to 700 dwellings, and leisure, recreation and community facilities in Polegate and Willingdon, around 850 dwellings in Stone Cross, with some 16,890 sq. metres employment floorspace in the Polegate and Willingdon area. Sites for development will be identified and phased through the Site Allocation DPDs including: · provision of around 550 homes within an extension to the urban area of Stone Cross to the east and south east (SD6), with flexibility between SD6 and SD7, subject to highway improvements; · provision of around 300 homes within an extension to the urban area of Stone Cross to the north (SD7), with flexibility between SD6 and SD7, subject to highway improvements’
We are intrigued by the Council’s intended adoption of an unsound housing position. The Council’s proposals for the provision of housing development during the period 2006 – 2030 demonstrate that the Council’s Local Development Framework Document is not in conformity with the Regional Spatial Strategy, which forms part of the Development Plan. Paragraph 3.3 of the Council’s Background Paper no. 1 (BP1) states “Current legislation requires that the Core Strategy is in general conformity with the Regional Spatial Strategy, the South East Plan” (SEP), which was adopted in May 2009. In paragraph 3.3 of BP1, the Council also acknowledge that “The South East Plan requires that at least 11,000 dwellings is provided in Wealden District between 2006 and 2026”. The SEP (Policy H1) requires 11,000 new dwellings to be provided in Wealden District between 2006 and 2026, equal to an overall annual requirement of 550 per year. Paragraph 3.3 of the Council’s BP1 states “Because of existing planning permissions and houses that have already been built since 2006, overall we need to find locations for a total of approximately 7,000 new houses between now and 2026”. Assuming 550 dwellings per year based on the SEP housing requirement, extending the PSCS DPD end date to 2030 (i.e. 4 more years) would require an additional 2,200 dwellings, bringing this total to the equivalent of 9,200 dwellings between 2006 and 2030. Policy WCS2 indicates that 4,889 dwellings are already committed (through planning permissions, commencements etc.) as at 1st April 2010. Set against the SEP requirement, this would leave a residual requirement for 6,111 dwellings up to 2026 (i.e. 11,000 minus 4,889) and if the SEP requirement were to be extended by 4 years up to 2030 (at 550 dwellings per year i.e. a total of 2,200 dwellings), this would create a total residual requirement of 8,311 additional dwellings by 2030. This residual requirement is the equivalent of 415 dwellings per annum during the remaining 20 year period between April 2010 and April 2030. By contrast, draft Policy WCS1 provides for a total provision of 9,600 dwellings between 2006 and 2030. Taking account of 4,889 dwelling commitments, this leaves only 4,711 new dwellings during the remaining 20 year period. This is the equivalent of only 230 dwellings per year (i.e. just over half that implied by extending the annual housing requirement set out in Policy H1 of the SEP to 2030). In draft Policy WCS2, the 9,600 dwelling figure referred to in draft Policy WCS1 has a total of 9,574 dwellings during the same 2006 – 2030 time period. The Council has not provided any justification for failing to comply with the housing requirements set out in SEP and no justification has been provided as to how the seemingly speculative figure of 9,600 dwellings or 9,574 dwellings has been arrived at for the housing requirement during the period 2006 – 2030 in draft Policies WCS1 and WCS2. As the council are aware there have been a number of recent announcements regarding the emerging Localism Bill and the changes being sought by the Government and we have looked to deal with these within our comments. As the Council is aware, Section 19 of the Planning and Compulsory Purchase Act 2004 (as amended) deals with the Preparation of local development documents. Section 19(2) specifically states that: “In preparing a Development Plan Document or any other local development document the local planning authority must have regard to (a) national policies and advice contained in guidance issued by the Secretary of State; (b) the RSS for the region in which the area of the authority is situated, if the area is outside Greater London”; (h) any other local development document which has been adopted by the authority”. The adopted South East Plan therefore remains part of the development plan and whatever the Council believes cannot be used as a reason for not complying with 19(2)(b) as this is a statutory requirement. This is particularly true bearing in mind recent appeal decisions, which confirm the status of the RSS’s and the limited weight that can be attributed at this time to the emerging Localism Bill. Accordingly any DPD that appears prior to enactment of the Localism Bill which materially departs from the RSS must be found unsound given that it would not comply with statute, particularly given the Governments recent announcement that an Environmental Assessment will now be carried out to consider the removal of the RSS’s. By any reasonable standard, this is likely to take a long period of time and it is therefore fair to assume the RSS’s will remain as part of the development plan for a good period to come. Nonetheless, even ignoring the above the Government remains committed to the delivery of more housing and it therefore seems perverse for the council to be attempting to adopt a strategy which seeks to reduce what should be recognised at the very least, as a minimum housing requirement. It is clear from all the above therefore that the RSS remains in law as part of the development plan and cannot be ignored, as the council appears to be seeking to do. We also refer the council back to the founding principles of the emerging local development framework. For example PPS 12 confirms that the Core Strategies; “4.36 Core strategies must be justifiable: they must be: • founded on a robust and credible evidence base; and • the most appropriate strategy when considered against the reasonable alternatives”. We question whether the council’s unjustified Housing Growth figures meet this simple test as presently emerging and we maintain therefore that the Councils emerging Core Strategy is not only deficient because it ignores the
adopted RSS, but it also not founded on the most up to date evidence base. Perhaps, however most importantly we draw the council’s attention to the evidence base it has at its disposal and indeed comments it makes in supporting documents for this Core Strategy. Paragraph 5.3 of the “Managing the Delivery of Housing Background Paper” – Background Paper 2 notes that “the Councils Housing Needs Assessment highlights the acute level of affordable housing need within the District and it is noted that the main means of achieving affordable housing delivery is by the means of the construction of market housing…” Paragraph 6.11 of the same document goes onto confirm that “on this basis, the assessment has identified an annual affordable housing need of 812 in Wealden”. On the basis that the delivery of affordable housing, as accepted by the Council is predicated on the delivery of market accommodation, the evidence supports a much higher level of growth than that envisaged by paragraphs 3.8 – 3.17 and more importantly policies WCS1 and WCS2 of the consultation document. Indeed, it is obvious from the above that a target of 4,685 new homes over the period 2006 – 2026 is neither robust or indeed accurate and would continue to exacerbate the ongoing chronic housing deficiencies in the district. Furthermore, paragraph 3.22 of BP1 is of course, wholly misleading as it compares housing target figures that relate to two different time periods. The 11,000 dwellings target relates to the housing requirement set out in SEP between the period 2006 and 2026 (i.e. equal to 550 dwellings per annum), whereas the Council’s reduced figure of 9,600 dwellings relates to an extended 4 year period between 2006 – 2030 which would be the equivalent of 400 dwellings per annum (i.e. a reduction of 150 dwellings per annum over the entire Plan period compared to the SEP). Thus, not only is the PSCS DPD not legally compliant in failing to be in accordance with the Development Plan (or its time period), but also it is not sound, as no satisfactory justification has been provided for the substantial reduction in the housing period and over an extended plan period. Moreover, no justification has been made as to why the council fails to take on board the evidence which clearly supports a higher housing provision than that proposed within the adopted RSS, particularly taking on board the Governments growth agenda.

Details of Changes to be Made:

We therefore suggest that the submitted Core strategy needs to be amended to take into the account the extant development plan, including the South East Plan’s housing target at the very least, but with a recognition for a higher level of growth should be planned for. At the very least therefore, there needs to be a larger degree of flexibility built into the document. Whilst the Council has within paragraphs 5.18 – 5.20, as well as policy WCS5 sought to provide a contingency within the document, this does not go far enough and needs to be far more robust to take account, as identified above of the chronic affordable housing issues that exist within the District.
we maintain therefore that the Council’s emerging Core Strategy is not only deficient because it ignores the question whether the council’s unjustified Housing Growth figures meet this simple test as presently emerging and evidence base; and • the most appropriate strategy when considered against the reasonable alternatives”. We
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given that it would not comply with statute, particularly given the Governments recent announcement that an
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requirement. This is particularly true bearing in mind recent appeal decisions, which confirm the status of the
adopted by the authority”. The adopted South East Plan therefore remains part of the development plan and
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whatever the Council believes cannot be used as a reason for not complying with 19(2)(b) as this is a statutory
planning permissions and houses that have already been built since 2006, overall we need to find locations for a
total of approximately 7,000 new houses between now and 2026”. Assuming 550 dwellings per year based on the
SEP housing requirement, extending the PSCS DPD end date to 2030 (i.e. 4 more years) would require an
additional 2,200 dwellings, bringing this total to the equivalent of 9,200 dwellings between 2006 and 2030. Policy WCS2 indicates that 4,889 dwellings are already committed (through planning permissions, commencements etc.) as at 1st April 2010. Set against the SEP requirement, this would leave a residual requirement for 6,111 dwellings up to 2026 (i.e. 11,000 minus 4,889) and if the SEP requirement were to be extended by 4 years up to 2030 (at 550 dwellings per year i.e. a total of 2,200 dwellings), this would create a total residual requirement of 8,311 additional dwellings by 2030. This residual requirement is the equivalent of 415 dwellings per annum during the remaining 20 year period between April 2010 and April 2030. By contrast, draft Policy WCS1 provides for a total provision of 9,600 dwellings between 2006 and 2030. Taking account of 4,889 dwelling commitments, this leaves only 4,685 new dwellings during the remaining 20 year period. This is the equivalent of only 230 dwellings per year (i.e. just over half that implied by extending the annual housing requirement set out in Policy H1 of the SEP to 2030). In draft Policy WCS2, the 9,600 dwelling figure referred to in draft Policy WCS1 has a total of 9,574 dwellings during the same 2006 – 2030 time period. The Council has not provided any justification for failing to comply with the housing requirements set out in SEP and no justification has been provided as to how the seemingly speculative figure of 9,600 dwellings or 9,574 dwellings has been arrived at for the housing requirement during the period 2006 – 2030 in draft Policies WSC1 and WSC2. As the council are aware there have been a number of recent announcements regarding the emerging Localism Bill and the changes being sought by the Government and we have looked to deal with these within our comments. As the Council is aware, Section 19 of the Planning and Compulsory Purchase Act 2004 (as amended) deals with the Preparation of local development documents. Section 19(2) specifically states that: “In preparing a Development Plan Document or any other local development document the local planning authority must have regard to (a) national policies and advice contained in guidance issued by the Secretary of State; (b) the RSS for the region in which the area of the authority is situated, if the area is outside Greater London”; (h) any other local development document which has been adopted by the authority”. The adopted South East Plan therefore remains part of the development plan and whatever the Council believes cannot be used as a reason for not complying with 19(2)(b) as this is a statutory requirement. This is particularly true bearing in mind recent appeal decisions, which confirm the status of the RSS’s and the limited weight that can be attributed at this time to the emerging Localism Bill. Accordingly any DPD that appears prior to enactment of the Localism Bill which materially departs from the RSS must be found unsound given that it would not comply with statute, particularly given the Governments recent announcement that an Environmental Assessment will now be carried out to consider the removal of the RSS’s. By any reasonable standard, this is likely to take a long period of time and it is therefore fair to assume the RSS’s will remain as part of the development plan for a good period to come. Nonetheless, even ignoring the above the Government remains committed to the delivery of more housing and it therefore seems perverse for the council to be attempting to adopt a strategy which seeks to reduce what should be recognised at the very least, as a minimum housing requirement. It is clear from all the above therefore that the RSS remains in law as part of the development plan and cannot be ignored, as the council appears to be seeking to do. We also refer the council back to the founding principles of the emerging local development framework. For example PPS 12 confirms that the Core Strategies; “4.36 Core strategies must be justifiable: they must be: • founded on a robust and credible evidence base; and • the most appropriate strategy when considered against the reasonable alternatives”. We question whether the council’s unjustified Housing Growth figures meet this simple test as presently emerging and we maintain therefore that the Councils emerging Core Strategy is not only deficient because it ignores the

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**Details of Reasons for Soundess/ Legal Complaince:**

We are intrigued by the Councils intended adoption of an unsound housing position. The Council’s proposals for the provision of housing development during the period 2006 – 2030 demonstrate that the Council’s Local Development Framework Document is not in conformity with the Regional Spatial Strategy, which forms part of the Development Plan. Paragraph 3.3 of the Council’s Background Paper no. 1 (BP1) states “Current legislation requires that the Core Strategy is in general conformity with the Regional Spatial Strategy, the South East Plan” (SEP), which was adopted in May 2009. In paragraph 3.3 of BP1, the Council also acknowledge that “The South East Plan requires that at least 11,000 dwellings is provided in Wealden District between 2006 and 2026”. The SEP (Policy H1) requires 11,000 new dwellings to be provided in Wealden District between 2006 and 2026, equal to an overall annual requirement of 550 per year. Paragraph 3.3 of the Council’s BP1 states “Because of existing planning permissions and houses that have already been built since 2006, overall we need to find locations for a total of approximately 7,000 new houses between now and 2026”. Assuming 550 dwellings per year based on the SEP housing requirement, extending the PSCS DPD end date to 2030 (i.e. 4 more years) would require an additional 2,200 dwellings, bringing this total to the equivalent of 9,200 dwellings between 2006 and 2030. Policy WCS2 indicates that 4,889 dwellings are already committed (through planning permissions, commencements etc.) as at 1st April 2010. Set against the SEP requirement, this would leave a residual requirement for 6,111 dwellings up to 2026 (i.e. 11,000 minus 4,889) and if the SEP requirement were to be extended by 4 years up to 2030 (at 550 dwellings per year i.e. a total of 2,200 dwellings), this would create a total residual requirement of 8,311 additional dwellings by 2030. This residual requirement is the equivalent of 415 dwellings per annum during the remaining 20 year period between April 2010 and April 2030. By contrast, draft Policy WCS1 provides for a total provision of 9,600 dwellings between 2006 and 2030. Taking account of 4,889 dwelling commitments, this leaves only 4,685 new dwellings during the remaining 20 year period. This is the equivalent of only 230 dwellings per year (i.e. just over half that implied by extending the annual housing requirement set out in Policy H1 of the SEP to 2030). In draft Policy WCS2, the 9,600 dwelling figure referred to in draft Policy WCS1 has a total of 9,574 dwellings during the same 2006 – 2030 time period. 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**Details of Changes to be Made:**

We therefore suggest that the submitted Core strategy needs to be amended to take into the account the extant development plan, including the South East Plan’s housing target at the very least, but with a recognition for a higher level of growth should be planned for. At the very least therefore, there needs to be a larger degree of flexibility built into the document. Whilst the Council has within paragraphs 5.18 – 5.20, as well as policy WCS5 sought to provide a contingency within the document, this does not go far enough and needs to be far more robust to take account, as indentified above of the chronic affordable housing issues that exist within the District.

**Representation ID**

1267

**Person ID** Mr Webster 534840

**Agent ID**

**Paragraph** 3.16

**Sound** Yes No Justified Effective Consistent with national policy

**Legally Compliant** Yes No

**Details of Reasons for Soundess/ Legal Complaince:**

1.1 The Council states that the Core Strategy intends that a total of around 9,600 dwellings will be created in the period 2006 - 2040. This is made up as follows. Houses already built (to April 2010) 1331 Existing commitments 3558 Proposed Additional Housing 4685 Total 9579 1.2 paragraph 3.10 of the Proposed Submission Core Strategy states that the Council expects the population of the district to increase between 2006 and 2030 by approximately 19,000 which represents 16,800 households. It is clear therefore that the number of new households likely to be created in the district over the plan period will be far in excess of the number of new dwellings planned. Even if all the new dwellings proposed are delivered this will only meet the needs of 57% of the expected new households. Well over 7,000 households will remain in housing need.

**Details of Changes to be Made:**

On this basis the Core Strategy is unsound because the numbers of dwellings proposed to be deliverd does not properly reflect the expected housing need. A larger number of dwellings should be planned for in Policy WCS1 to redress the shortfall in District-wide housing allocations. the total should be closer to the number of new households expected to be created over the plan period.
Paragraph 3.16

Details of Reasons for Soundess/ Legal Complaince:
The Council states that the Core Strategy intends that a total of around 9,600 dwellings will be created in the period 2006 - 2040. This is made up as follows: Houses already built (to April 2010) 1331 Existing commitments 3558 Proposed additional housing 4685 Total 9579 2. Paragraph 3.10 of the Proposed Submission Core Strategy states that the Council expects the population of the district to increase between 2006 and 2030 by approximately 19,000 which represents 16,800 households. It is clear therefore that the number of new households likely to be created in the district over the plan period will be far in excess of the number of new dwellings planned. Even if all the new dwellings proposed are delivered this will only meet the needs of 57% of the expected new households. Well over 7,000 households will remain in housing need. Due to the size of additional appendices they have not been uploaded but are available to view at the Council's offices.

Details of Changes to be Made:
3. On this basis the Core Strategy is unsound because the numbers of dwellings that are proposed to be delivered are deficient and do not properly reflect the expected housing need. A larger number of dwellings should therefore be planned for in Policy WCS1 to redress the shortfall in District-wide housing allocations.

 Representation ID
1249

Person ID  Dekl
344781

Agent ID  Mr Nightingale
102571

Kember Loudon Williams

Paragraph 3.16

Sound  □ Yes  ☑ No  ☑ Justified  ☑ Effective  □ Consistent with national policy

Legally Compliant  □ Yes  □ No

Details of Reasons for Soundess/ Legal Complaince:
The Council states that the Core Strategy intends that a total of around 9,600 dwellings will be created in the period 2006 - 2040. This is made up as follows: Houses already built (to April 2010) 1331 Existing commitments 3558 Proposed additional housing 4685 Total 9579 2. Paragraph 3.10 of the Proposed Submission Core Strategy states that the Council expects the population of the district to increase between 2006 and 2030 by approximately 19,000 which represents 16,800 households. It is clear therefore that the number of new households likely to be created in the district over the plan period will be far in excess of the number of new dwellings planned. Even if all the new dwellings proposed are delivered this will only meet the needs of 57% of the expected new households. Well over 7,000 households will remain in housing need.

Details of Changes to be Made:
The total number of dwellings to be provided should be increased, with significantly more housing development being identified in the north of the district where the market is stronger and a known need for housing exists.

 Representation ID
1515

Person ID  Mr Williams
103948

Agent ID  Kember Loudon Williams

Paragraph 3.16

Sound  □ Yes  ☑ No  ☑ Justified  ☑ Effective  □ Consistent with national policy

Legally Compliant  □ Yes  □ No

Details of Reasons for Soundess/ Legal Complaince:
1. The Council states that the Core Strategy intends that a total of around 9,600 dwellings will be created in the period 2006 - 2030. This is made up as follows: Houses already built to April 2010 1331 Existing commitments 3558 Proposed additional housing 4685 Total 9579 2. Paragraph 3.10 of the Proposed Submission Core Strategy states that the Council expects the population of the District to increase between 2006 and 2030 by approximately 19,600 which represents 16,800 households. It is clear therefore that the number of new households likely to be created in the district over the plan period will be far in excess of the number of dwellings planned. Even if all of the new dwellings proposed are delivered this will only meet the needs of 57% of the expected new households. Well over 7,000 households will remain in housing need. Due to the size of additional appendices they have not been uploaded but are available to view at the Council's offices.

Details of Changes to be Made:
3. On this basis the Core Strategy is unsound because the numbers of dwellings that are proposed to be delivered are deficient and do not properly reflect the expected housing need. A larger number of dwellings should therefore be planned for in Policy WCS1 to redress the shortfall in District-wide housing allocations.
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The total number of dwellings to be provided should be increased, with significantly more housing development being identified in the north of the District where the market is stronger and a known need for housing exists.
Details of Reasons for Soundness/ Legal Compliance:
See earlier comments and objection to paragraph 3.11. The constraints applicable to Hailsham have not been fully evaluated and tested. There remain outstanding studies into these matters i.e. traffic modelling of development location options, waster water treatment works capacity and odour issues relating to land to the east of Hailsham town centre.

Details of Changes to be Made:
The Core Strategy should be further informed by current and further research into infrastructure constraints, funding and phasing of development options in association with increased capacity and the introduction of a Community Infrastructure Levy (or CIL).

Details of Reasons for Soundess/ Legal Complaince:
"Supplementary documents have been submitted but not attached, and may be viewed at the Council offices on request".

Details of Changes to be Made:
REVISION SOUGHT Increase number of additional dwellings at Hailsham to 2,500 and Polegate to 2,500. Reduce the number of dwellings at Stone Cross to 300 and delete sentence on Stone Cross in relation to it's sustainability.

Details of Reasons for Soundess/ Legal Complaince:
The area around Willingdon is already short of Doctors, school places and leisure facilities. To add extra housing at Hindsland playing fields is going to put extreme pressure on our already very congested road systems. These are sometimes at a complete standstill now, traffic is backed up into Eastbourne and through Polegate. It seems that local views are being sidelined ( The Big Society??) and the already over used area being targetted without any thought for the residents here now.

Details of Changes to be Made:
More local consultation with the people it affects.
Details of Reasons for Soundess/ Legal Complaince:
There are no environmental considerations or infrastructure capacity reasons why development at Stone Cross should be preferred over more development in or around Hailsham. Development around Hailsham would assist in reinforcing the pattern of existing settlements within the district as opposed to working against such Core Strategy objectives in the way development at stone cross would.

Details of Changes to be Made:
Delete reference to Stone Cross

Details of Reasons for Soundess/ Legal Complaince:
The Council states that the Core Strategy intends that a total of around 9,600 dwellings will be created in the period 2006 - 2040. This is made up as follows. Houses already built (to April 2010) 1331 Existing commitments 3558 Proposed Additional Housing 4685 Total 9579 2. paragraph 3.10 of the Porposed Submission Core Strategy states that the Council expects the population of the district to increase between 2006 and 2030 by approximately 19,000 which represents 16,800 households. It is clear therefore that the number of new households likely to be created in the district over the plan period will be far in excess of the number of new dwellings planned. Even if all the new dwellings proposed are delivered this will only meet the needs of 57% of the expected new households. Well over 7,000 households will remain in housing need. 3. On this basis the Core Strategy is unsound because the numbers of dwellings proposed to be deliverd does not properly reflect the expected housing need. A larger number of dwellings should be planned for in Policy WCS1 to reddress the shortfall in District-wide housing allocations. the total should be closer to the number of new households expected to be created over the plan period.

Details of Changes to be Made:
The total number of dwellings to be provided should be increased, with significantly more housing development being identified in the north of the district where the market is stronger and a known need for housing exists.
Details of Reasons for Soundness/ Legal Complaince:

1.1 The Council states that the Core Strategy intends that a total of around 9,600 dwellings will be created in the period 2006 - 2040. This is made up as follows. Houses already built (to April 2010) 1331 Existing commitments 3558 Proposed Additional Housing 4685 Total 9579 1.2 paragraph 3.10 of the Porposed Submission Core Strategy states that the Council expects the population of the district to increase between 2006 and 2030 by approximately 19,000 which represents 16,800 households. It is clear therefore that the number of new households likely to be created in the district over the plan period will be far in excess of the number of new dwellings planned. Even if all the new dwellings proposed are delivered this will only meet the needs of 57% of the expected new households. Well over 7,000 households will remain in housing need.

Details of Changes to be Made:

On this basis the Core Strategy is unsound because the numbers of dwellings proposed to be deliverd does not properly reflect the expected housing need. A larger number of dwellings should be planned for in Policy WCS1 to redress the shortfall in District-wide housing allocations. the total should be closer to the number of new households expected to be created over the plan period.

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Details of Reasons for Soundness/ Legal Complaince:

Housing: We support the strategy for supporting some growth within sustainable villages

Details of Changes to be Made:
We are intrigued by the Council’s intended adoption of an unsound housing position. The Council’s proposals for the provision of housing development during the period 2006 – 2030 demonstrate that the Council’s Local Development Framework Document is not in conformity with the Regional Spatial Strategy, which forms part of the Development Plan. Paragraph 3.3 of the Council’s Background Paper no. 1 (BP1) states “Current legislation requires that the Core Strategy is in general conformity with the Regional Spatial Strategy, the South East Plan” (SEP), which was adopted in May 2009. In paragraph 3.3 of BP1, the Council also acknowledge that “The South East Plan requires that at least 11,000 dwellings is provided in Wealden District between 2006 and 2026”. The SEP (Policy H1) requires 11,000 new dwellings to be provided in Wealden District between 2006 and 2026, equal to an overall annual requirement of 550 per year. Paragraph 3.3 of the Council’s BP1 states “Because of existing planning permissions and houses that have already been built since 2006, overall we need to find locations for a total of approximately 7,000 new houses between now and 2026”. Assuming 550 dwellings per year based on the SEP housing requirement, extending the PSCS DPD end date to 2030 (i.e. 4 more years) would require an additional 2,200 dwellings, bringing this total to the equivalent of 9,200 dwellings between 2006 and 2030. Policy WCS2 indicates that 4,889 dwellings are already committed (through planning permissions, commencements etc.) as at 1st April 2010. Set against the SEP requirement, this would leave a residual requirement for 6,111 dwellings up to 2026 (i.e. 11,000 minus 4,889) and if the SEP requirement were to be extended by 4 years up to 2030 (at 550 dwellings per year i.e. a total of 2,200 dwellings), this would create a total residual requirement of 8,311 additional dwellings by 2030. This residual requirement is the equivalent of 415 dwellings per annum during the remaining 20 year period between April 2010 and April 2030. By contrast, draft Policy WCS1 provides for a total provision of 9,600 dwellings between 2006 and 2030. Taking account of 4,889 dwelling commitments, this leaves only 4,685 new dwellings during the remaining 20 year period. This is the equivalent of only 230 dwellings per year (i.e. just over half that implied by extending the annual housing requirement set out in Policy H1 of the SEP to 2030). In draft Policy WCS2, the 9,600 dwelling figure referred to in draft Policy WCS1 has a total of 9,574 dwellings during the same 2006 – 2030 time period. 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Section 19(2) specifically states that: “In preparing a Development Plan Document or any other local development document the local planning authority must have regard to (a) national policies and advice contained in guidance issued by the Secretary of State; (b) the RSS for the region in which the area of the authority is situated, if the area is outside Greater London”; (h) any other local development document which has been adopted by the authority”. The adopted South East Plan therefore remains part of the development plan and whatever the Council believes cannot be used as a reason for not complying with 19(2)(b) as this is a statutory requirement. This is particularly true bearing in mind recent appeal decisions, which confirm the status of the RSS’s and the limited weight that can be attributed at this time to the emerging Localism Bill. Accordingly any DPD that appears prior to enactment of the Localism Bill which materially departs from the RSS must be found unsound given that it would not comply with statute, particularly given the Governments recent announcement that an Environmental Assessment will now be carried out to consider the removal of the RSS’s. By any reasonable standard, this is likely to take a long period of time and it is therefore fair to assume the RSS’s will remain as part of the development plan for a good period to come. Nonetheless, even ignoring the above the Government remains committed to the delivery of more housing and it therefore seems perverse for the council to be attempting to adopt a strategy which seeks to reduce what should be recognised at the very least, as a minimum housing requirement. It is clear from all the above therefore that the RSS remains in law as part of the development plan and cannot be ignored, as the council appears to be seeking to do. 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**Details of Changes to be Made:**

We therefore suggest that the submitted Core strategy needs to be amended to take into the account the extant development plan, including the South East Plan’s housing target at the very least, but with a recognition for a higher level of growth should be planned for. At the very least therefore, there needs to be a larger degree of flexibility built into the document. Whilst the Council has within paragraphs 5.18 – 5.20, as well as policy WCS5 sought to provide a contingency within the document, this does not go far enough and needs to be far more robust to take account, as identified above of the chronic affordable housing issues that exist within the District.
We are intrigued by the Council's intended adoption of an unsound housing position. The Council's proposals for the provision of housing development during the period 2006 – 2030 demonstrate that the Council’s Local Development Framework Document is not in conformity with the Regional Spatial Strategy, which forms part of the Development Plan. Paragraph 3.3 of the Council’s Background Paper no. 1 (BP1) states “Current legislation requires that the Core Strategy is in general conformity with the Regional Spatial Strategy, the South East Plan” (SEP), which was adopted in May 2009. In paragraph 3.3 of BP1, the Council also acknowledge that “The South East Plan requires that at least 11,000 dwellings is provided in Wealden District between 2006 and 2026”. The SEP (Policy H1) requires 11,000 new dwellings to be provided in Wealden District between 2006 and 2026, equal to an overall annual requirement of 550 per year. Paragraph 3.3 of the Council’s BP1 states “Because of existing planning permissions and houses that have already been built since 2006, overall we need to find locations for a total of approximately 7,000 new houses between now and 2026”. Assuming 550 dwellings per year based on the SEP housing requirement, extending the PSCS DPD end date to 2030 (i.e. 4 more years) would require an additional 2,200 dwellings, bringing this total to the equivalent of 9,200 dwellings between 2006 and 2030. Policy WCS2 indicates that 4,889 dwellings are already committed (through planning permissions, commencements etc.) as at 1st April 2010. Set against the SEP requirement, this would leave a residual requirement for 6,111 dwellings up to 2026 (i.e. 11,000 minus 4,889) and if the SEP requirement were to be extended by 4 years up to 2030 (at 550 dwellings per year i.e. a total of 2,200 dwellings), this would create a total residual requirement of 8,311 additional dwellings by 2030. This residual requirement is the equivalent of 415 dwellings per annum during the remaining 20 year period between April 2010 and April 2030. By contrast, draft Policy WCS1 provides for a total provision of 9,600 dwellings between 2006 and 2030. Taking account of 4,889 dwelling commitments, this leaves only 4,711 new dwellings during the remaining 20 year period. This is the equivalent of only 230 dwellings per year (i.e. just over half that implied by extending the annual housing requirement set out in Policy H1 of the SEP to 2030). In draft Policy WCS2, the 9,600 dwelling figure referred to in draft Policy WCS1 has a total of 9,574 dwellings during the same 2006 – 2030 time period. The Council has not provided any justification for failing to comply with the housing requirements set out in SEP and no justification has been provided as to how the seemingly speculative figure of 9,600 dwellings or 9,574 dwellings has been arrived at for the housing requirement during the period 2006 – 2030 in draft Policies WSC1 and WSC2. As the council are aware there have been a number of recent announcements regarding the emerging Localism Bill and the changes being sought by the Government and we have looked to deal with these within our comments. As the Council is aware, Section 19 of the Planning and Compulsory Purchase Act 2004 (as amended) deals with the Preparation of local development documents. Section 19(2) specifically states that: “In preparing a Development Plan Document or any other local development document the local planning authority must have regard to (a) national policies and advice contained in guidance issued by the Secretary of State; (b) the RSS for the region in which the area of the authority is situated, if the area is outside Greater London”; (h) any other local development document which has been adopted by the authority”. The adopted South East Plan therefore remains part of the development plan and whatever the Council believes cannot be used as a reason for not complying with 19(2)(b) as this is a statutory requirement. This is particularly true bearing in mind recent appeal decisions, which confirm the status of the RSS’s and the limited weight that can be attributed at this time to the emerging Localism Bill. Accordingly any DPD that appears prior to enactment of the Localism Bill which materially departs from the RSS must be found unsound given that it would not comply with statute, particularly given the Governments recent announcement that an Environmental Assessment will now be carried out to consider the removal of the RSS’s. By any reasonable standard, this is likely to take a long period of time and it is therefore fair to assume the RSS’s will remain as part of the development plan for a good period to come. Nonetheless, even ignoring the above the Government remains committed to the delivery of more housing and it therefore seems perverse for the council to be attempting to adopt a strategy which seeks to reduce what should be recognised at the very least, as a minimum housing requirement. It is clear from all the above therefore that the RSS remains in law as part of the development plan and cannot be ignored, as the council appears to be seeking to do. 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Details of Changes to be Made:
We therefore suggest that the submitted Core strategy needs to be amended to take into the account the extant development plan, including the South East Plan’s housing target at the very least, but with a recognition for a higher level of growth should be planned for. At the very least therefore, there needs to be a larger degree of flexibility built into the document. Whilst the Council has within paragraphs 5.18 – 5.20, as well as policy WCS5 sought to provide a contingency within the document, this does not go far enough and needs to be far more robust to take account, as indentified above of the chronic affordable housing issues that exist within the District.

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**Representation ID**
1560

**Person ID**  Mr Williams

**Agent ID**  Kember Loudon Williams

**Paragraph**  3.17

**Sound**  □ Yes  ☑ No  □ Justified  ☑ Effective  □ Consistent with national policy

**Legally Compliant**  □ Yes  □ No

**Details of Reasons for Soundess/ Legal Complaince:**
The Number of Dwelling Proposed to be delivered. (Paragraphs 3.8 – 3.17, Policy WCS1) 1 The Council states that the Core Strategy intends that a total of around 9,600 dwellings will be created in the period 2006 to 2030. This is made up as follows: Houses already build (to April 2010) 1331 Existing commitments 3558 Proposed Additional Housing 4685 Total 9579

**Details of Changes to be Made:**
2 Paragraph 3.10 of the Proposed Submission Core Strategy states that the Council expects the population of the District to increase between 2006 and 2030 by approximately 19,000, which represents 16,800 households. It is clear therefore that the number of new households likely to be created in the district over the plan period will be far in excess of the number of new dwellings planned. Even if all of the new dwellings proposed are delivered this will only meet the needs of 57% of the expected new households. Well over 7,000 households will remain in housing need.
### Summary of all Representations - Proposed Submission Core Strategy Regulation 27 - Report 11th July 2011

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<tr>
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<tr>
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<td>332748</td>
<td>Mr Nightingale</td>
<td>102571</td>
<td>Kember Loudon Williams</td>
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<td>Mr Williams</td>
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<td>Kember Loudon Williams</td>
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#### Paragraph 3.17

**Details of Reasons for Soundness/ Legal Complaince:**

1. The Council states that the Core Strategy intends that a total of around 9,600 dwellings will be created in the period 2006 to 2030. This is made up as follows: Houses already built (to April 2010) 1331, Existing commitments 3558, Proposed Additional Housing 4685, TOTAL 9579.

2. Paragraph 3.10 of the Proposed Submission Core Strategy states that the Council expects the population of the District to increase between 2006 and 2030 by approximately 19,000, which represents 16,800 households. It is clear therefore that the number of new households likely to be created in the district over the plan period will be far in excess of the number of new dwellings planned. Even if all of the new dwellings proposed are delivered this will only meet the needs of 57% of the expected new households. Well over 7,000 households will remain in housing need.

3. On this basis the Core Strategy is unsound because the numbers of dwellings proposed to be delivered does not properly reflect the expected housing need. A larger number of dwellings should therefore be planned for in Policy WCS1 to redress the shortfall in District-wide housing allocations.

**Details of Changes to be Made:**

The total number of dwellings to be provided should be increased, with significantly more housing development being identified in the north of the District where the market is stronger and a known need for housing exists.

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</tbody>
</table>
Details of Reasons for Soundess/ Legal Complaince:
The figure of 4,889 has been omitted from the allocation north of Dittons Road, Polegate which accommodate 60 dwellings.

Details of Changes to be Made:
Paragraph 3.8, change 4,889 to 4,949

Details of Reasons for Soundess/ Legal Complaince:
The Council states that the Core Strategy intends that a total of around 9,600 dwellings will be created in the period 2006 - 2040. This is made up as follows. Houses already built (to April 2010) 1331 Existing commitments 3558 Proposed Additional Housing 4685 Total 9579 2. paragraph 3.10 of the Porposed Submission Core Strategy states that the Council expects the population of the district to increase between 2006 and 2030 by approximately 19,000 which represents 16,800 households. It is clear therefore that the number of new households likely to be created in the district over the plan period will be far in excess of the number of new dwellings planned. Even if all the new dwellings proposed are delivered this will only meet the needs of 57% of the expected new households. Well over 7,000 households will remain in housing need. 3. On this basis the Core Strategy is unsound because the numbers of dwellings proposed to be deliverd does not properly reflect the expected housing need. A larger number of dwellings should be planned for in Policy WCS1 to reddress the shortfall in District-wide housing allocations. the total should be closer to the number of new households expected to be created over the plan period.

Details of Changes to be Made:
The total number of dwellings to be provided should be increased, with significantly more housing development being identified in the north of the district where the market is stronger and a known need for housing exists.
Consistent with national policy

We maintain therefore that the Councils emerging Core Strategy is not only deficient because it ignores the question whether the council's unjustified Housing Growth figures meet this simple test as presently emerging and the Core Strategies; ”4.36 Core strategies must be justifiable: they must be: • founded on a robust and credible back to the founding principles of the emerging local development framework. For example PPS 12 confirms that development plan and cannot be ignored, as the council appears to be seeking to do. We also refer the council remains committed to the delivery of more housing and it therefore seems perverse for the council to be of the development plan for a good period to come. Nonetheless, even ignoring the above the Government Environmental Assessment will now be carried out to consider the removal of the RSS's. By any reasonable given that it would not comply with statute, particularly given the Governments recent announcement that an RSS's and the limited weight that can be attributed at this time to the emerging Localism Bill. Accordingly any DPD that appears prior to enactment of the Localism Bill which materially departs from the RSS must be found unsound attempts to adopt a strategy which seeks to reduce what should be recognised at the very least, as a minimum housing requirement. This is particularly true bearing in mind recent appeal decisions, which confirm the status of the seemingly speculative figure of 9,600 dwellings or 9,574 dwellings has been arrived at for the housing requirement during the period 2006 – 2030 in draft PoliciesWSC1 and WSC2. As the council are aware there have been a number of recent announcements regarding the emerging Localism Bill and the changes being sought by the Government and we have looked to deal with these within our comments. As the Council is aware, Section 19 of the Planning and Compulsory Purchase Act 2004 (as amended) deals with the Preparation of local development documents. Section 19(2) specifically states that: ”In preparing a Development Plan Document or any other local development document the local planning authority must have regard to (a) national policies and advice contained in guidance issued by the Secretary of State; (b) the RSS for the region in which the area of the authority is situated, if the area is outside Greater London”; (h) any other local development document which has been adopted by the authority”. The adopted South East Plan therefore remains part of the development plan and whatever the Council believes cannot be used as a reason for not complying with 19(2)(b) as this is a statutory requirement. This is particularly true bearing in mind recent appeal decisions, which confirm the status of the RSS’s and the limited weight that can be attributed at this time to the emerging Localism Bill. Accordingly any DPD that appears prior to enactment of the Localism Bill which materially departs from the RSS must be found unsound given that it would not comply with statute, particularly given the Governments recent announcement that an Environmental Assessment will now be carried out to consider the removal of the RSS’s. By any reasonable standard, this is likely to take a long period of time and it is therefore fair to assume the RSS’s will remain as part of the development plan for a good period to come. Nonetheless, even ignoring the above the Government remains committed to the delivery of more housing and it therefore seems perverse for the council to be attempting to adopt a strategy which seeks to reduce what should be recognised at the very least, as a minimum housing requirement. It is clear from all the above therefore that the RSS remains in law as part of the development plan and cannot be ignored, as the council appears to be seeking to do. We also refer the council back to the founding principles of the emerging local development framework. For example PPS 12 confirms that the Core Strategies; ”4.36 Core strategies must be justifiable: they must be: • founded on a robust and credible evidence base; and • the most appropriate strategy when considered against the reasonable alternatives”. We question whether the council’s unjustified Housing Growth figures meet this simple test as presently emerging and we maintain therefore that the Councils emerging Core Strategy is not only deficient because it ignores the
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**Details of Changes to be Made:**

We therefore suggest that the submitted Core strategy needs to be amended to take into the account the extant development plan, including the South East Plan’s housing target at the very least, but with a recognition for a higher level of growth should be planned for. At the very least therefore, there needs to be a larger degree of flexibility built into the document. Whilst the Council has within paragraphs 5.18 – 5.20, as well as policy WCS5 sought to provide a contingency within the document, this does not go far enough and needs to be far more robust to take account, as indentified above of the chronic affordable housing issues that exist within the District.
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Details of Changes to be Made:
We therefore suggest that the submitted Core strategy needs to be amended to take into the account the extant development plan, including the South East Plan’s housing target at the very least, but with a recognition for a higher level of growth should be planned for. At the very least therefore, there needs to be a larger degree of flexibility built into the document. Whilst the Council has within paragraphs 5.18 – 5.20, as well as policy WCS5 sought to provide a contingency within the document, this does not go far enough and needs to be far more robust to take account, as indentified above of the chronic affordable housing issues that exist within the District.

Representation ID
1259

Person ID Mr Webster
Agent ID 534840

Paragraph 3.8

Sound ☑ Yes ☐ No ☑ Justified ☑ Effective ☑ Consistent with national policy

Legally Compliant ☑ Yes ☐ No

Details of Reasons for Soundess/ Legal Complaince:
1.1 The Council states that the Core Strategy intends that a total of around 9,600 dwellings will be created in the period 2006 - 2040. This is made up as follows. Houses already built (to April 2010) 1331 Existing commitments 3558 Proposed Additional Housing 4685 Total 9579 1.2 paragraph 3.10 of the Porposed Submission Core Strategy states that the Council expects the population of the district to increase between 2006 and 2030 by approximately 19,000 which represents 16,800 households. It is clear therefore that the number of new households likely to be created in the district over the plan period will be far in excess of the number of new dwellings planned. Even if all the new dwellings proposed are delivered this will only meet the needs of 57% of the expected new households. Well over 7,000 households will remain in housing need.

Details of Changes to be Made:
On this basis the Core Strategy is unsound because the numbers of dwellings proposed to be deliverd does not properly reflect the expected housing need. A larger number of dwellings should be planned for in Policy WCS1 to redress the shortfall in District-wide housing allocations. the total should be closer to the number of new households expected to be created over the plan period.

Yes

Sound ☐ No ☑ Justified ☑ Effective ☑ Consistent with national policy

Legally Compliant ☑ Yes ☐ No

Details of Changes to be Made:
On this basis the Core Strategy is unsound because the numbers of dwellings proposed to be deliverd does not properly reflect the expected housing need. A larger number of dwellings should be planned for in Policy WCS1 to redress the shortfall in District-wide housing allocations. the total should be closer to the number of new households expected to be created over the plan period.
Details of Reasons for Soundness/Legal Compliance:

1. The Council states that the Core Strategy intends that a total of around 9,600 dwellings will be created in the period 2006 - 2030. This is made up as follows: Houses already built (to April 2010) 1,331. Existing commitments 3,558. Proposed Additional Housing 4,685. Total 9,579.

2. Paragraph 3.10 of the Proposed Submission Core Strategy states that the Council expects the population of the District to increase between 2006 and 2030 by approximately 19,600, which represents 16,800 households. It is clear therefore that the number of new households likely to be created in the district over the plan period will be far in excess of the number of dwellings planned. Even if all of the new dwellings proposed are delivered this will only meet the needs of 57% of the expected new households. Well over 7,000 households will remain in housing need. Due to the size of additional appendices they have not been uploaded but are available to view at the Council's offices.

Details of Changes to be Made:

3. On this basis the Core Strategy is unsound because the numbers of dwellings that are proposed to be delivered are deficient and do not properly reflect the expected housing need. A larger number of dwellings should therefore be planned for in Policy WCS1 to redress the shortfall in District-wide housing allocations.
The Number of Dwelling Proposed to be delivered. (Paragraphs 3.8 – 3.17, Policy WCS1) The Council states that the Core Strategy intends that a total of around 9,600 dwellings will be created in the period 2006 to 2030. This is made up as follows: Houses already build (to April 2010) 1331 Existing commitments 3558 Proposed Additional Housing 4685 Total 9579

Details of Changes to be Made:

2 Paragraph 3.10 of the Proposed Submission Core Strategy states that the Council expects the population of the District to increase between 2006 and 2030 by approximately 19,000, which represents 16,800 households. It is clear therefore that the number of new households likely to be created in the district over the plan period will be far in excess of the number of new dwellings planned. Even if all of the new dwellings proposed are delivered this will only meet the needs of 57% of the expected new households. Well over 7,000 households will remain in housing need.

Details of Reasons for Soundess/ Legal Complaince:
The Council acknowledge that that over the past 6 years 600 persons per year have moved into the District. This figure and those from regional statistics suggest the Council will not meet its housing needs over the plan period.

Details of Changes to be Made:
The regional Spacial Strategy is the most robust assessment of Population change, migration, immigration, and household formation but this is ignored.

The Council acknowledge that that over the past 6 years 600 person per year have moved into the District. This figure and those from regional statistics suggest the Council will not meet its housing needs over the plan period.

Details of Changes to be Made:
The Regional Spacial Strategy is the most robust assessment of Population change, migration, immigration and household formation but is ignored.
Paragraph 3.9
Details of Reasons for Soundess/ Legal Complaince:
The Council states that the Core Strategy intends that a total of around 9,600 dwellings will be created in the period 2006 - 2040. This is made up as follows. Houses already built (to April 2010) 1,331 Existing commitments 3,558 Proposed Additional Housing 4,685 Total 9,579
2. paragraph 3.10 of the Proposed Submission Core Strategy states that the Council expects the population of the district to increase between 2006 and 2030 by approximately 19,000 which represents 16,800 households. It is clear therefore that the number of new households likely to be created in the district over the plan period will be far in excess of the number of new dwellings planned. Even if all the new dwellings proposed are delivered this will only meet the needs of 57% of the expected new households. Well over 7,000 households will remain in housing need.
3. On this basis the Core Strategy is unsound because the numbers of dwellings proposed to be delivered does not properly reflect the expected housing need. A larger number of dwellings should be planned for in Policy WCS1 to redress the shortfall in District-wide housing allocations. The total should be closer to the number of new households expected to be created over the plan period.

Details of Changes to be Made:
The total number of dwellings to be provided should be increased, with significantly more housing development being identified in the north of the district where the market is stronger and a known need for housing exists.

Paragraph 3.9
Details of Reasons for Soundess/ Legal Complaince:
1.1 The Council states that the Core Strategy intends that a total of around 9,600 dwellings will be created in the period 2006 - 2040. This is made up as follows. Houses already built (to April 2010) 1,331 Existing commitments 3,558 Proposed Additional Housing 4,685 Total 9,579
1.2 paragraph 3.10 of the Proposed Submission Core Strategy states that the Council expects the population of the district to increase between 2006 and 2030 by approximately 19,000 which represents 16,800 households. It is clear therefore that the number of new households likely to be created in the district over the plan period will be far in excess of the number of new dwellings planned. Even if all the new dwellings proposed are delivered this will only meet the needs of 57% of the expected new households. Well over 7,000 households will remain in housing need.

Details of Changes to be Made:
On this basis the Core Strategy is unsound because the numbers of dwellings proposed to be delivered does not properly reflect the expected housing need. A larger number of dwellings should be planned for in Policy WCS1 to redress the shortfall in District-wide housing allocations. The total should be closer to the number of new households expected to be created over the plan period.
We are intrigued by the Council's intended adoption of an unsound housing position. The Council's proposals for the provision of housing development during the period 2006 – 2030 demonstrate that the Council's Local Development Framework Document is not in conformity with the Regional Spatial Strategy, which forms part of the Development Plan. Paragraph 3.3 of the Council's Background Paper no. 1 (BP1) states “Current legislation requires that the Core Strategy is in general conformity with the Regional Spatial Strategy, the South East Plan” (SEP), which was adopted in May 2009. In paragraph 3.3 of BP1, the Council also acknowledge that “The South East Plan requires that at least 11,000 dwellings is provided in Wealden District between 2006 and 2026”. The SEP (Policy H1) requires 11,000 new dwellings to be provided in Wealden District between 2006 and 2026, equal to an overall annual requirement of 550 per year. Paragraph 3.3 of the Council’s BP1 states “Because of existing planning permissions and houses that have already been built since 2006, overall we need to find locations for a total of approximately 7,000 new houses between now and 2026”. Assuming 550 dwellings per year based on the SEP housing requirement, extending the PSCS DPD end date to 2030 (i.e. 4 more years) would require an additional 2,200 dwellings, bringing this total to the equivalent of 9,200 dwellings between 2006 and 2030. Policy WCS2 indicates that 4,889 dwellings are already committed (through planning permissions, commencements etc.) as at 1st April 2010. Set against the SEP requirement, this would leave a residual requirement for 6,111 dwellings up to 2026 (i.e. 11,000 minus 4,889) and if the SEP requirement were to be extended by 4 years up to 2030 (at 550 dwellings per year i.e. a total of 2,200 dwellings), this would create a total residual requirement of 8,311 additional dwellings by 2030. This residual requirement is the equivalent of 415 dwellings per annum during the remaining 20 year period between April 2010 and April 2030. By contrast, draft Policy WCS1 provides for a total provision of 9,600 dwellings between 2006 and 2030. Taking account of 4,889 dwelling commitments, this leaves only 4,711 new dwellings during the remaining 20 year period. This is the equivalent of only 230 dwellings per year (i.e. just over half that implied by extending the annual housing requirement set out in Policy H1 of the SEP to 2030). In draft Policy WCS2, the 9,600 dwelling figure referred to in draft Policy WCS1 has a total of 9,574 dwellings during the same 2006 – 2030 time period. The Council has not provided any justification for failing to comply with the housing requirements set out in SEP and no justification has been provided as to how the seemingly speculative figure of 9,600 dwellings or 9,574 dwellings has been arrived at for the housing requirement during the period 2006 – 2030 in draft Policies WCS1 and WCS2. As the council are aware there have been a number of recent announcements regarding the emerging Localism Bill and the changes being sought by the Government and we have looked to deal with these within our comments. As the Council is aware, Section 19 of the Planning and Compulsory Purchase Act 2004 (as amended) deals with the Preparation of local development documents. Section 19(2) specifically states that: “In preparing a Development Plan Document or any other local development document the local planning authority must have regard to (a) national policies and advice contained in guidance issued by the Secretary of State; (b) the RSS for the region in which the area of the authority is situated, if the area is outside Greater London”; (h) any other local development document which has been adopted by the authority”. The adopted South East Plan therefore remains part of the development plan and whatever the Council believes cannot be used as a reason for not complying with 19(2)(b) as this is a statutory requirement. This is particularly true bearing in mind recent appeal decisions, which confirm the status of the RSS’s and the limited weight that can be attributed at this time to the emerging Localism Bill. Accordingly any DPD that appears prior to enactment of the Localism Bill which materially departs from the RSS must be found unsound given that it would not comply with statute, particularly given the Governments recent announcement that an Environmental Assessment will now be carried out to consider the removal of the RSS’s. By any reasonable standard, this is likely to take a long period of time and it is therefore fair to assume the RSS’s will remain as part of the development plan for a good period to come. Nonetheless, even ignoring the above the Government remains committed to the delivery of more housing and it therefore seems perverse for the council to be attempting to adopt a strategy which seeks to reduce what should be recognised at the very least, as a minimum housing requirement. It is clear from all the above therefore that the RSS remains in law as part of the development plan and cannot be ignored, as the council appears to be seeking to do. We also refer the council back to the founding principles of the emerging local development framework. For example PPS 12 confirms that the Core Strategies; “4.36 Core strategies must be justifiable: they must be: • founded on a robust and credible evidence base; and • the most appropriate strategy when considered against the reasonable alternatives”. We question whether the council’s unjustified Housing Growth figures meet this simple test as presently emerging and we maintain therefore that the Councils emerging Core Strategy is not only deficient because it ignores the
We therefore suggest that the submitted Core strategy needs to be amended to take into the account the extant development plan, including the South East Plan’s housing target at the very least, but with a recognition for a higher level of growth should be planned for. At the very least therefore, there needs to be a larger degree of flexibility built into the document. Whilst the Council has within paragraphs 5.18 – 5.20, as well as policy WCS5 sought to provide a contingency within the document, this does not go far enough and needs to be far more robust to take account, as identified above of the chronic affordable housing issues that exist within the District.
Summary of all Representations - Proposed Submission Core Strategy Regulation 27 - Report 11th July 2011

We are intrigued by the Council’s intended adoption of an unsound housing position. The Council’s proposals for the provision of housing development during the period 2006 – 2030 demonstrate that the Council’s Local Development Framework Document is not in conformity with the Regional Spatial Strategy, which forms part of the Development Plan. Paragraph 3.3 of the Council’s Background Paper no. 1 (BP1) states “Current legislation requires that the Core Strategy is in general conformity with the Regional Spatial Strategy, the South East Plan” (SEP), which was adopted in May 2009. In paragraph 3.3 of BP1, the Council also acknowledge that “The South East Plan requires that at least 11,000 dwellings is provided in Wealden District between 2006 and 2026”. The SEP (Policy H1) requires 11,000 new dwellings to be provided in Wealden District between 2006 and 2026, equal to an overall annual requirement of 550 per year. Paragraph 3.3 of the Council’s BP1 states “Because of existing planning permissions and houses that have already been built since 2006, overall we need to find locations for a total of approximately 7,000 new houses between now and 2026”. Assuming 550 dwellings per year based on the SEP housing requirement, extending the PSCS DPD end date to 2030 (i.e. 4 more years) would require an additional 2,200 dwellings, bringing this total to the equivalent of 9,200 dwellings between 2006 and 2030. Policy WCS2 indicates that 4,889 dwellings are already committed (through planning permissions, commencements etc.) as at 1st April 2010. Set against the SEP requirement, this would leave a residual requirement for 6,111 dwellings up to 2026 (i.e. 11,000 minus 4,889) and if the SEP requirement were to be extended by 4 years up to 2030 (at 550 dwellings per year i.e. a total of 2,200 dwellings), this would create a total residual requirement of 8,311 additional dwellings by 2030. This residual requirement is the equivalent of 415 dwellings per annum during the remaining 20 year period between April 2010 and April 2030. By contrast, draft Policy WCS1 provides for a total provision of 9,600 dwellings between 2006 and 2030. Taking account of 4,889 dwelling commitments, this leaves only 4,685 new dwellings during the remaining 20 year period. This is the equivalent of only 230 dwellings per year (i.e. just over half that implied by extending the annual housing requirement set out in Policy H1 of the SEP to 2030). In draft Policy WCS2, the 9,600 dwelling figure referred to in draft Policy WCS1 has a total of 9,574 dwellings during the same 2006 – 2030 time period. The Council has not provided any justification for failing to comply with the housing requirements set out in SEP and no justification has been provided as to how the seemingly speculative figure of 9,600 dwellings or 9,574 dwellings has been arrived at for the housing requirement during the period 2006 – 2030 in draft Policies WSC1 and WSC2. As the council are aware there have been a number of recent announcements regarding the emerging Localism Bill and the changes being sought by the Government and we have looked to deal with these within our comments. As the Council is aware, Section 19 of the Planning and Compulsory Purchase Act 2004 (as amended) deals with the Preparation of local development documents. Section 19(2) specifically states that: “In preparing a Development Plan Document or any other local development document the local planning authority must have regard to (a) national policies and advice contained in guidance issued by the Secretary of State; (b) the RSS for the region in which the area of the authority is situated, if the area is outside Greater London”; (h) any other local development document which has been adopted by the authority”. The adopted South East Plan therefore remains part of the development plan and whatever the Council believes cannot be used as a reason for not complying with 19(2)(b) as this is a statutory requirement. This is particularly true bearing in mind recent appeal decisions, which confirm the status of the RSS’s and the limited weight that can be attributed at this time to the emerging Localism Bill. Accordingly any DPD that appears prior to enactment of the Localism Bill which materially departs from the RSS must be found unsound given that it would not comply with statute, particularly given the Governments recent announcement that an Environmental Assessment will now be carried out to consider the removal of the RSS’s. By any reasonable standard, this is likely to take a long period of time and it is therefore fair to assume the RSS’s will remain as part of the development plan for a good period to come. Nonetheless, even ignoring the above the Government remains committed to the delivery of more housing and it therefore seems perverse for the council to be attempting to adopt a strategy which seeks to reduce what should be recognised at the very least, as a minimum housing requirement. It is clear from all the above therefore that the RSS remains in law as part of the development plan and cannot be ignored, as the council appears to be seeking to do. We also refer the council back to the founding principles of the emerging local development framework. For example PPS 12 confirms that the Core Strategies; “4.36 Core strategies must be justifiable: they must be: • founded on a robust and credible evidence base; and • the most appropriate strategy when considered against the reasonable alternatives”. We question whether the council’s unjustified Housing Growth figures meet this simple test as presently emerging and we maintain therefore that the Councils emerging Core Strategy is not only deficient because it ignores the
adopted RSS, but it also not founded on the most up to date evidence base. Perhaps, however most importantly we draw the council’s attention to the evidence base it has at its disposal and indeed comments it makes in supporting documents for this Core Strategy. Paragraph 5.3 of the “Managing the Delivery of Housing Background Paper” – Background Paper 2 notes that “the Councils Housing Needs Assessment highlights the acute level of affordable housing need within the District and it is noted that the main means of achieving affordable housing delivery is by the means of the construction of market housing...” Paragraph 6.11 of the same document goes onto confirm that “on this basis, the assessment has identified an annual affordable housing need of 812 in Wealden”. On the basis that the delivery of affordable housing, as accepted by the Council is predicated on the delivery of market accommodation, the evidence supports a much higher level of growth than that envisaged by paragraphs 3.8 – 3.17 and more importantly policies WCS1 and WCS2 of the consultation document. Indeed, it is obvious from the above that a target of 4,685 new homes over the period 2006 – 2026 is neither robust or indeed accurate and would continue to exacerbate the ongoing chronic housing deficiencies in the district. Furthermore, paragraph 3.22 of BP1 is of course, wholly misleading as it compares housing target figures that relate to two different time periods. The 11,000 dwellings target relates to the housing requirement set out in SEP between the period 2006 and 2026 (i.e. equal to 550 dwellings per annum), whereas the Council’s reduced figure of 9,600 dwellings relates to an extended 4 year period between 2006 – 2030 which would be the equivalent of 400 dwellings per annum (i.e. a reduction of 150 dwellings per annum over the entire Plan period compared to the SEP). Thus, not only is the PSCS DPD not legally compliant in failing to be in accordance with the Development Plan (or its time period), but also it is not sound, as no satisfactory justification has been provided for the substantial reduction in the housing period and over an extended plan period. Moreover, no justification has been made as to why the council fails to take on board the evidence which clearly supports a higher housing provision than that proposed within the adopted RSS, particularly taking on board the Governments growth agenda.

**Details of Changes to be Made:**

We therefore suggest that the submitted Core strategy needs to be amended to take into the account the extant development plan, including the South East Plan’s housing target at the very least, but with a recognition for a higher level of growth should be planned for. At the very least therefore, there needs to be a larger degree of flexibility built into the document. Whilst the Council has within paragraphs 5.18 – 5.20, as well as policy WCS5 sought to provide a contingency within the document, this does not go far enough and needs to be far more robust to take account, as indentified above of the chronic affordable housing issues that exist within the District.
Details of Reasons for Soundess/ Legal Complaince:

1. The Council states that the Core Strategy intends that a total of around 9,600 dwellings will be created in the period 2006 - 2030. This is made up as follows: Houses already built (to April 2010) 1331, Existing commitments 3558, Proposed additional housing 4685. TOTAL 9579.

2. Paragraph 3.10 of the Proposed Submission Core Strategy states that the Council expects the population of the district to increase between 2006 and 2030 by approximately 19,000, which represents 16,800 households. It is clear therefore that the number of new households likely to be created in the district over the plan period will be far in excess of the number of new dwellings planned. Even if all of the new dwellings proposed are delivered this will only meet the needs of 57% of the expected new households. Well over 7,000 households will remain in housing need.

3. On this basis the Core Strategy is unsound because the numbers of dwellings proposed to be delivered does not properly reflect the expected housing need. A larger number of dwellings should be planned for in Policy WCS1 to redress the shortfall in District-wide housing allocations. The total should be closer to the number of new households expected to be created over the plan period.

Details of Changes to be Made:

The total number of dwellings to be provided should be increased, with significantly more housing development being identified in the north of the District where the market is stronger and a known need for housing exists.
Paragraph 3.19
Details of Reasons for Soundess/ Legal Compliance:
Policy WCS3 makes no provision for additional employment provision in the rural area (which includes Westham) even though the ELR2008 indicated that our client's site (Mountney Bridge Industrial Estate) could accommodate growth/development. Policy WCS3 does not therefore correspond with paragraphs 3.19 or 3.22 which support intensification of employment areas. Policy SPO6 is unclear and unsound, it is implied that any new jobs created will only make a positive contribution to the towns of Uckfield, Hailsham, Polegate and Willingdon.

Details of Changes to be Made:
Policy SP06 should be amended to make it clear that new economic development will be encouraged across all settlements in the district, particularly those in South Wealden, such as Westham. We also consider that the Mountney Bridge Industrial Estate should be identified for intensification and expansion. WCS3 should refer to the other locations which can accommodate intensification and expansion and there should be recognition that some lower order settlements such as Westham can contribute to economic growth.

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Paragraph 3.22
Details of Reasons for Soundess/ Legal Compliance:
Employment and Business: we endorse the Council's recognition of the importance of leisure and tourism and the support expressed for rural diversification - including the conversion of redundant agricultural buildings - to the benefit of the landscape. We welcome the recognition of the implications of poor broadband infrastructure in the rural areas, and the importance of maintaining services in rural settlements that support local jobs.

Details of Changes to be Made:
Details of Reasons for Soundness/ Legal Compliance:
Policy WCS3 makes no provision for additional employment provision in the rural area (which includes Westham) even though the ELR2008 indicated that our client's site (Mountney Bridge Industrial Estate) could accommodate growth/development. Policy WCS3 does not therefore correspond with paragraphs 3.19 or 3.22 which support intensification of employment areas. Policy SPO6 is unclear and unsound, it is implied that any new jobs created will only make a positive contribution to the towns of Uckfield, Hailsham, Polegate and Willingdon

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Policy SP06 should be amended to make it clear that new economic development will be encouraged across all settlements in the district, particularly those in South Wealden, such as Westham. We also consider that the Mountney Bridge Industrial Estate should be identified for intensification and expansion. WCS3 should refer to the other locations which can accommodate intensification and expansion and there should be recognition that some lower order settlements such as Westham can contribute to economic growth.

Details of Reasons for Soundness/ Legal Compliance:
‘Suitable parking provision’ to support retailing and other business is ambiguous. There is clear concern of traffic impact on Ashdown Forest (3.32), parking issues at Polegate station (6.25) and limited supply of brownfield development opportunity (5.8). Policies rightly aspire to cut traffic, combat climate change, avoid flood risk areas, improve safety and maximise use of previously developed land. Parking is a key element in making these effective

Details of Changes to be Made:
‘Suitable parking provision’ should clearly avoid being ‘excessive’, in pursuit of these policies. A significant quantity of current parking space should be available for brownfield redevelopment. Car free developments should be encouraged and supported.
‘Suitable parking provision’ to support retailing and other business is ambiguous. There is clear concern of traffic impact on Ashdown Forest (3.32), parking issues at Polegate station (6.25) and limited supply of brownfield development opportunity (5.8). Policies rightly aspire to cut traffic, combat climate change, avoid flood risk areas, improve safety and maximise use of previously developed land. Parking is a key element in making these effective.

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Details of Reasons for Soundness/ Legal Compliance:

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Details of Changes to be Made:

‘Suitable parking provision’ should clearly avoid being ‘excessive’, in pursuit of these policies. A significant quantity of current parking space should be available for brownfield redevelopment. Car free developments should be encouraged and supported.

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Details of Reasons for Soundness/ Legal Compliance:

Tesco supports vision and spatial planning objective SP04 of the proposed submission of the Core Strategy, to allow the five towns long term vitality commercial centres, serving their respective local areas and maintaining the role of the market town with more substantial investment in Uckfield, Crowborough and Hailsham. However, no information is provided on future retail and town centre development, to ensure the five town centres achieve the Core Strategy aim of becoming ‘thriving commercial centres’. Tesco considers that the Core Strategy should provide options for the future development of retail uses within the five town centres. A number of strategic retail policy options were set out in the Wealden District Council Interim Shopping Study (WDC ISS, 2008) which was prepared as part of the evidence based to support the Core Strategy. However, the Core Strategy does not appear to have taken into consideration the findings of the Shopping Study. We consider that it is necessary to consider the findings of the study and examine policy options for the future provision of retail floorspace in the district. In this respect, we consider that the shopping study's findings on need for more retail floorspace are unduly cautious, and thus the Core Strategy should treat these findings as the District's minimum requirements. Furthermore, the shopping study found that there is a high level of convenience outflow from the district (WDD ISS Para 4.12). This is acknowledge in the Spatial Development options background Paper 4 ‘Summary Guide to Evidence Studies’ (Para 5.6) but there has been no reference in the Core Strategy to the scope for future retail development which might address this convenience outflow and ensure the district is more self sufficient. Tesco therefore considers the Core Strategy should address future retail and town centre development.

Details of Changes to be Made:
### Representation ID
1177

<table>
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<th>Person ID</th>
<th>Trus</th>
<th>Agent ID</th>
<th>Mr Scott</th>
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<tr>
<td>522185</td>
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Paragraph 3.25

**Sound**

- Yes
- No [☑]  Justified [☑]  Effective [☐]  Consistent with national policy

**Legally Compliant**

- Yes [☑]  No [☐]

**Details of Reasons for Soundess/ Legal Complaince:**

Together with Uckfield and Hailsham, Crowborough is one of the largest settlements within the District and a major provider of retail space, although this is affected to a degree by the proximity to Primary Centres. However it is clear from the evidence - notably the Summary of Town Planning Documents Background Paper and the related Town Council vision document Top of the Weald that there is significant local demand for an enhancement of the local retail offer - both to improve the vitality and liveability of the town and to achieve tourism objectives. It is therefore suggested that not to include any provision for upgrading and improving the retail offer is a major omission.

**Details of Changes to be Made:**

To recognise that there is local demand for the enhancement of the retail offer at Crowborough.

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### Representation ID
475

<table>
<thead>
<tr>
<th>Person ID</th>
<th>Mr Phillips</th>
<th>Agent ID</th>
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<tr>
<td>104870</td>
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Paragraph 3.25

**Sound**

- Yes [☐]  No [☑]  Justified [☑]  Effective [☐]  Consistent with national policy

**Legally Compliant**

- Yes [☑]  No [☐]

**Details of Reasons for Soundess/ Legal Complaince:**

‘Suitable parking provision’ to support retailing and other business is ambiguous. There is clear concern of traffic impact on Ashdown Forest (3.32), parking issues at Polegate station (6.25) and limited supply of brownfield development opportunity (5.8). Policies rightly aspire to cut traffic, combat climate change, avoid flood risk areas, improve safety and maximise use of previously developed land. Parking is a key element in making these effective.

**Details of Changes to be Made:**

‘Suitable parking provision’ should clearly avoid being ‘excessive’, in pursuit of these policies. A significant quantity of current parking space should be available for brownfield redevelopment. Car free developments should be encouraged and supported.
Details of Reasons for Soundess/ Legal Complaince:
As with many other, wholly laudable, aspirations expressed in this document WDC has no actual ability to deliver. We can however review one of the recent developments that have occurred as a direct result of it's planning decisions. The combined muscle power of East Sussex County Council and Tesco ensured that an additional mainstream supermarket opened in Hailsham. In spite of the fact that we already had a mainstream outlet, The Co-op, as well as the slightly up-market Waitrose. I understand that the Co-op will not now be renewing it's lease in the Quintins shopping centre. As a direct result of this the Post Office will now have to move from it's current reasonably spacious outlet. to, I understand, a newsagent in the High Street. The current square footage of this outlet is less than the PO currently uses. Moving it to this location would be a joke! I am sure that in due course we will have no Post Office - this in a town of more than 20,000. Thanks a bunch Wealden!

Details of Changes to be Made:
Wealden has no power to deliver. Hailsham has sufficient available retail outlet space, Polegate (and Eastbourne) have sufficient available retail outlet space. The only planning issue is what to do with the empty shops! Is it within the Planning Inspector's remit to question why the document does not address the issue of what to do with empty retail outlets? Considering a practical and radical review of classification would be a relevant activity for a planning authority. I feel that this 'strategy' as with others in this submission is presented to justify the existence of an increasingly expensive yet increasingly ineffective and irrelevant organisation.
Representation ID
1448
Person ID Ms Greenhaigh  Agent ID Ms Greenhaigh
522281 Valad Property Group  522279 Indigo Planning Limited

Location of Business, Retail and Tourism within Wealden District

Sound  ☑ No  ☑ Justified  ☑ Effective  ☑ Consistent with national policy
Legally Compliant  ☑ Yes  ☑ No

Details of Reasons for Soundness/ Legal Compliance:
The Wealden settlement hierarchy does not adequately reflect the settlement structure in the district and, as such, it is unsound. Westham should be identified as a Service Centre due to the facilities and employment areas it contains. The hierarchy constrains positive development in lower order settlements, that may contribute to sustainable growth of the area. paragraph 3.4 should clarity that some local service centres are capable of accommodating sustainable growth.

Details of Changes to be Made:
The Wealden settlement hierarch should be redrafted to reflect the settlement structure in the district and allow for growth to meet future economic and social needs. We consider that Westham should be allocated as a service centre due to the facilities and employment areas it contains. Paragraph 3.4 should clarify that some local service centres are capable of accommodating sustainable growth. Please see Indigo Planning letter dated 15 April 2011

Legally Compliant  ☑ Yes  ☑ No

Details of Reasons for Soundness/ Legal Compliance:
Policy WCS3 makes no provision for additional employment provision in the rural area (which includes Westham) even though the ELR2008 indicated that our client’s site (Mountney Bridge Industrial Estate) could accommodate growth/development. Policy WCS3 does not therefore correspond with paragraphs 3.19 or 3.22 which support intensification of employment areas. Policy SPO6 is unclear and unsound, it is implied that any new jobs created will only make a positive contribution to the towns of Uckfield, Hailsham, Polegate and Willingdon

Details of Changes to be Made:
Policy SP06 should be amended to make it clear that new economic development will be encouraged across all settlements in the district, particularly those in South Wealden, such as Westham. We also consider that the Mountney Bridge Industrial Estate should be identified for intensification and expansion. WCS3 should refer to the other locations which can accommodate intensification and expansion and there should be recognition that some lower order settlements such as Westham can contribute to economic growth.
Tourism: We welcome the reference to the national park attracting visitors to the district, and the need to increase visitor spend through appropriate means, while also seeking to relieve pressures on vulnerable areas.

Details of Changes to be Made:

Yes
Sound
Justified
Effective
Consistent with national policy
Legally Compliant

Details of Reasons for Soundness/ Legal Complaince:

It is recommended that the Council may, therefore, wish to add its explicit support for the safeguarding of the Sheffield Park to Lewes railway route, with associated junction reinstatement to the Uckfield railway route north of Lewes, on the basis that the future reinstatement and extension of the Bluebell Railway operations southwards would bring additional economic benefit to Wealden District Council area.

Details of Changes to be Made:

Yes
Sound
Justified
Effective
Consistent with national policy
Legally Compliant

Details of Reasons for Soundness/ Legal Complaince:

We feel that the proposed avoidance and mitigation measures of SANGS and contributions for onsite access management will ensure that housing within 7km will not have a likely significant impact on Ashdown Forest.

Details of Changes to be Made:
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Environment: this section surprisingly omits any specific mention of the downs - other than within Lewes District! This should be rectified.

Details of Changes to be Made:
7.1.1 In this section of the report we present our representations in regard to landscape matters in and informing the Core Strategy. Our representation is made in regard to paragraphs 3.30 – 3.33 of the submission Core Strategy, Policies WC4 and WC13 and supporting background papers. 7.1.2 For the purposes of this representation we have reviewed the ‘Landscape Character Assessment and Development Option Evaluation Study’ undertaken for the district (referred hereinafter as the ‘Landscape Study’), which is included as a background paper to the Core Strategy on the Councils website. However, it is not clear how the Landscape Study has been used to inform the spatial strategy as it is not specifically referred to in the text of Core Strategy nor is the Landscape Study listed as a background paper at paragraph 1.7 of the Core Strategy (although it is included as a background paper on the Councils website). 7.1.3 We have reviewed the methodology set out in the document and we have also reviewed whether the methodology has been consistently applied resulting in a final report that is robust, thorough and transparent and one that would form a credible evidence base suitable to inform the spatial strategy contained in the Core Strategy. 7.1.4 We contend that the Landscape Study is flawed and therefore the assessment of housing sites in the district, the spatial strategy and the Councils Sustainability Appraisal, and thus the Core Strategy, is unsound. 7.1.5 Our representation is summarised below: Section of Core Strategy: Spatial Planning Objectives 1, 3 and 11, Paras 3.30 - 3.33, Policy WCS4 Strategic Development Areas, Framework. The Landscape Study is not listed as a background paper at paragraph 1.7 of the Core Strategy Core Strategy. The paragraph goes on to state: “However, our strategy has been guided by high levels of protection on local and national levels, and more detailed policies are contained within the Core Strategy and further ones in subsequent DPDs.” 7.1.9 Paragraph 1.7 in the Introduction to the Core Strategy refers to a number of specialist studies that have been produced to provide a robust evidence base to inform the Local Development Framework. The Landscape Study is not listed as a background paper at paragraph 1.7 of the Core Strategy (although it is included as a background paper on the Councils website). Policy WCS4 Strategic Development Areas and Paragraphs 6.9 and 6.11 The Core Strategy proposes that the land to the west of Uckfield be identified as a ‘strategic development area’ suitable for accommodating 1,000 homes and some 12,650 sq metres net of employment floor space and education provision as an extension to the urban area to the west of New Town. Paragraph 6.9 refers to the SHLAA and assessment of the potential sites at the fringes of the urban area. 7.1.11 In the light of the comments that follow in this section of our representations on the Landscape Study, it is considered that this proposal be reassessed and, taking into account other representations made on other parts and policies contained in the Core Strategy, greater emphasis should be given to the suitability of land at Maresfield to accommodate increased housing numbers and a larger proportion of the housing requirements for the district. Policy WSC13 Green Infrastructure, Paragraphs 7.23 - 7.28 and Background Paper BP6 7.1.12 Policy WSC13 and paragraph 7.23 to 7.28 relating to Green Infrastructure is supported although it is considered that the anomalies and errors in the Landscape Study be addressed before this document is used to inform and guide the implementation of Green Infrastructure Strategy and also formulation of the specific measures for the protection and enhancement of the landscape which are to set out in the Delivery and Site Allocations DPD referred to at paragraph 7.28 of the Core Strategy. 7.1.13 It is not clear from reading the Core Strategy, how the Landscape Study has been used to inform the above policies. 7.2 Consideration of the Methodology employed in the Landscape Study 7.2.1 Wealden Council commissioned the Landscape Study from the Landscape Group at East Sussex County Council, in September 2007. It was published in February 2009. The purpose of the Study is to: 1. Inform the preparation of WDC Local Development Framework Core Strategy and; 2. Inform the development policies on landscape management and protection. 7.2.2 The Landscape Study states that it will: 1. Assess the existing landscape character of key search areas 2. Assess the quality and value of the existing landscape in these key search areas 3. Assess the sensitivity if the existing landscape and its capacity to accept change or having regard to the scope for mitigation 4. Make recommendations on preferred locations from a landscape perspective. 7.2.3 The Landscape Study purports to use a number of methodologies for the assessment and
identifies these as being: 1. For Landscape Character/ Quality and Value - Design Manual for Roads and Bridges Vol 11, section 3, Part 5 (DT) which has been further refined by the Landscape Character Assessment Guidance for England and Scotland (CA/SNH 2002) and; 2. For landscape sensitivity – Landscape Character Assessment Guidance for England and Scotland, Topic Paper No.6: Techniques and criteria for Judging Capacity and Sensitivity (CA 2002). 7.2.4 The Landscape Study sets out, in section 2.0, the methodology and criteria used for each aspect of the landscape being assessed, including the following: 1. Landscape Quality (this should be ‘condition’ if following latest LCA guidance as the term quality is now a discredited approach to assessing landscapes) 2. Landscape Value 3. Landscape Sensitivity 4. Visual Sensitivity 5. Landscape Capacity 7.2.5 In relation to the assessment of landscape capacity, capacity is defined in Topic Paper No.6: ‘Techniques and Criteria for Judging Capacity and Sensitivity’ as: ‘The degree to which a particular landscape type or area is able to accommodate change without significant effect on its character, or overall change of landscape character type. Capacity is likely to vary according to the type and nature of change being proposed’. 7.2.6 We have reviewed the Landscape Study, in particular, the methodology set out in the document and whether this has been consistently applied to form a credible evidence base suitable to inform the spatial strategy contained in the Core Strategy. 7.2.7 The review of the Core Strategy background paper indicates that the Landscape Study has not followed the guidance in Topic Paper No.6. Topic Paper No.6 suggests that there are two approaches to assessing landscape sensitivity. These are: 1. Judging Overall Landscape Sensitivity and; 2. Judging Landscape Sensitivity to a specific type of change. 7.2.8 However, in order to assess landscape capacity, the assessment of the sensitivity of different types or areas of landscape to the type of change in question must be combined with an assessment of the more subjective or perceptual aspects of the landscape and of the value attached to the landscape. 7.2.9 The stages for assessing landscape capacity of a landscape are set out in Section 3.0 of Topic Paper No.6 and reproduced in Figure 7.1 below. Figure 7.1: Stages for assessing landscape capacity Source: Landscape Character Assessment Guidance for England and Scotland, Topic Paper No.6: Techniques and criteria for Judging Capacity and Sensitivity (CA 2002) 7.2.10 Sections 5.0 and 6.0 of Topic Paper No.6 provide the more detailed considerations that need to be taken into account. 7.2.11 The boxed text, at paragraph 2.11.2 of the Landscape Study, follows the same assessment stages used to assess the landscape capacity to accommodate a specific type of change and given the local scale of the assessment work it is considered that this is the appropriate method to use. 7.2.12 However, Topic Paper No.6, at paragraph 6.5, also goes on to state that: ‘Capacity is all a question of the interaction between the sensitivity of the landscape, the type and amount of change and the way that the landscape is valued’. 7.2.13 Sections 2.11 and 2.12 of the Landscape Study set out the approach used by East Sussex County Council landscape group in undertaking the landscape study. However, the assessment does not define the quantum of housing development used to assess the capacity of each character area, nor is the LDF Core Issues and Options Consultation Paper July 2007 referred to as a guide to the quantum of housing development used to assess each of the different character areas. The Landscape Study does however state at paragraph 2.12.3 that: ‘an overall assessment can be made for each character area on the capacity to accept the type of change being considered. This judgement is made according to the combination of characteristics that contribute to a particular area of landscape. The capacity of an area to accept change is related to the potential of the area to accommodate development in a particular location without detracting from the overall character of that landscape. The capacity evaluation of each character area does not assume that this is the capacity across the entire character area’ 7.2.14 There are a number interrelated issues raised in the above paragraph which we now turn to. 7.2.15 In relation to the type of change, the Landscape Study defines, at paragraph 2.12.6, the assumptions used for the assessment business uses, i.e. the assessment of sensitivity / capacity is based on light industrial type uses which would be consistent with a residential environment and these would be single storey units. However the Landscape Study does not define the full details of the housing use, such as type (housing - single storey / two storey / three storey etc) or amount (large / medium / small scale development) and we contend that the details of the change being considered is not transparent from the Landscape Study, as although the type of change (i.e. housing) is known, the form and amount of housing is unknown. These are important factors when considering the landscape capacity of an area to accommodate development, especially if using the stages set in the Landscape Study. 7.2.16 A similar assumption to the business use (or range of assumptions) could have been used for assessing the impact on landscape sensitivity / capacity of each character area. For example two to three storey houses at the following ranges: 1. small scale housing between five to 50 dwellings 2. medium scale housing development between 50 to 200 dwellings, and 3. large scale housing development between 200 to 500 dwellings. 7.2.17 In relation to the combination of the characteristics that contribute to a particular area, comments on these are made in later sections (See paragraphs 7.4.1 to 7.4.14 below). 7.2.18 The Landscape Study also refers to mitigation and management of the landscape (Section 2.13) and, in paragraph 2.13.1, it highlights that mitigation has been used to determine the visual and character sensitivity of the landscape. This approach does not accord with Topic Paper No.6 as mitigation should only be used to inform the visual sensitivity of the area assessed, (See Figure 7.1 above), and not directly the character sensitivity of an area (although visual aspects are one of the aspects that inform the character of an area). Mitigation in itself can have a significant effect on character and the landscapes capacity to accommodate development. In some cases mitigation would make an area less suitable to accommodate development not more suitable. Again this, we would contend, is a flaw in the assessment. The existing management of the landscape is relevant to determining the condition (or quality) of an area of landscape but the identification of management opportunities is not relevant to determining the capacity of the landscape to
accommodate development. Management of the land could in itself bring about a change to the landscape which is discordant with its character, for instance managing the land to encourage woodland growth or planting extensive woodlands in a very open exposed landscape would lead to a significant change. 7.2.19 The methodology section of the Landscape Study also includes a part dealing with the Areas of Outstanding Natural Beauty (AONB) within the district. Section 2.14 refers to ‘AONBs and AONB Buffer Zones’ as a way of identifying higher value landscapes within Wealden. At paragraph 2.14.2 the Landscape Study states: ‘There is, in some areas adjacent to the AONB boundary a buffer zone to the AONB landscape. This is usually an area of similar character but not of the same quality as the AONB landscape and not covered by the same planning policy. Where relevant these areas are indicated in the figures’. 7.2.20 Paragraph 2.14.4, the Landscape Study goes on the state the following: ‘These buffer zones have been identified through the character area analysis. The relative sensitivity of these areas has been considered according to the landscape character to achieve a balanced comparison with AONB and AONB landscapes’. 7.2.21 The Landscape Study considers that there is support for this ‘buffer zone’ approach due to Policy EN2 (f) of the East Sussex and Brighton and Hove Structure Plan. We contend that this approach is flawed and unsound. Firstly, the Structure Plan has been superseded by the South East Plan and at the time of preparing the Landscape Study during the period August 2007 to February 2009, both East Sussex County Council and Wealden District Council would have been aware of the emerging South East Plan policies through the draft regional plan. Secondly, Policy EN2 (f) does not prohibit development but seeks to protect the Sussex Downs and High Weald AONBs and minimise the impact of development within them by requiring measures to integrate the development in to the landscape. Thirdly, there is no Government policy support for the concept of ‘AONB buffers’ in Planning Policy Statement No.7. Like Policy EN2 of the Structure Plan, PPS 7 does not prohibit development within the boundaries or adjoining an AONB but merely seeks to ensure that the landscapes within AONBs are considered carefully and appropriate measures taken to mitigate the harm that potential development may cause. 7.2.22 The fourth point is that, whilst the Council would seek support from Policy EN2 (f) as a way of ‘balancing the comparison between AONB and non AONB areas’ especially the areas of landscape close to the AONB boundary, the East Sussex and Brighton and Hove Structure Plan does not define the extent of the buffer zone on the Key Diagram nor is the extent of the buffer area set out in its explanatory text. We contend that the justification for this approach must be given very little weight. 7.2.23 Lastly, it is acknowledged that some areas of landscape within an AONB may be of poorer condition (quality) score and / or lower visual and character sensitivity than areas outside of the AONB but the adjustment in the landscape sensitivity / capacity scoring by introducing what appears to be an arbitrary AONB buffer zone seems to undermine the purposes and status of the AONB designation,(and its planning policy protection), by attaching increased value to a character area that adjoins the AONB which although it may be of a similar character, does not meet the quality criteria for inclusion within the AONB. In addition, it is noted that the Landscape Study has not been subject to peer review and there is no evidence that it has had stakeholder input / consultation with statutory consultees, such Natural England / High Weald AONB Joint Advisory Committee and other interested bodies to agree this approach to the AONBs. 7.2.24 The Study goes on to set out the method used to undertake a comparative evaluation of a potential development area within a character area which has capacity to accommodate development. This gives an early indication of sites which would be worthy of further consideration for development in landscape terms. We contend that the comparative assessment of character areas within the District is flawed as the starting point for the assessment the landscape sensitivity / capacity analysis is unsound for the reason given above. 7.2.25 Notwithstanding the above point, Section 2.15.4 of the Landscape Study states that: ‘Prior to coming to a firm view on the full potential and scope in these areas further investigation would be required’. 7.2.26 However, the Study does not present evidence of this further investigation or how preferred development areas have been chosen; for example there is no detailed assessment of the west of Uckfield area although this has been identified as a major urban extension area under Policy WCS4 - SD1. 7.3 Critical Review of the findings of the Landscape Study 7.3.1 The Landscape Study methodology sets out how each landscape character is to be assessed and the information recorded using landscape character assessment sheets (section 2.5) whilst section 2.17 of the Landscape Study refers to mapping which is split into two stages. Stage 1 relates to recording baseline information on each character area such as planning designation, Public Right of Way and key viewpoint, focal point, landscape features and detractors (which should be read with the assessment record sheets). Stage 2 relates to the identification of potential development areas with indicative boundaries and also identifies key woods, shaws, hedges, tree belts etc and also the potential for mitigation planting. 7.3.2 In order to assess the robustness of the landscape capacity study for the purpose of this representation, the area around Uckfield, Maresfield and Five Ash Down were visited and the baseline information recorded on the landscape assessment sheets checked and the judgements reached reviewed. This check revealed that that were a number of elements / features not recorded or identified for some areas and therefore these factors were not able to inform the judgement reached. 7.3.3 For example, ‘Maresfield Area A’, is described as; ‘An open, undulating landscape used for pasture to the west and pleasure to the east. It is ungrazed showing some scrub. Wide long views to the south. Surrounded on other sides by mature trees and exotic Eucalyptus and Cedars from nearby Park. Fine houses on outskirts and within site. Fine clumps of Pines. Some road noise adjoins picturesque recreation ground’. 7.3.4 The assessment sheet omits a number of important features such as areas of woodlands and plantations, (some of which are ancient woodlands and provide screening, containment and form visual barriers). Hedges, fences, footpaths and reference to the bypass were not recorded. The assessment sheet also refers to parkland and that the majority of the land is amenity land lacking management. A wide long view(s) out to
the south is highlighted as a key feature which is correct when looking south from a small part of the area but elsewhere views are contained and obscured by landform and vegetation. The record sheet includes a photograph of the view south but this is not taken from the recreation ground as recorded on the map Figure 52. The photograph was taken from private land on the footpath. 7.3.5 In the visual appraisal section of the assessment sheet it records the local receptors as amenity land and houses, types of view as long views from top of ridge to the south and visual barriers as landform / trees and hedges. It concludes that the sensitivity is high (see table 7.1 below). It is acknowledged that there are views within the area but these tend to be short partial or glimpsed views with long views out towards the south from high ground in the north eastern parts of character area. Views into the area are very limited and development within the area would have a minimal impact on views. However, in views from the ridge to the south the recreation occupying the north eastern parts of the character area is seen whilst the remaining areas are hidden from view and therefore the visual sensitivity of the majority of the area is low. 7.3.6 The resultant evaluation of this area was considered as follows: Table 7.1: Landscape Study Assessment, Maresfield Area A Character Area Maresfield A Quality Good Value Medium Sensitivity to Change Moderate Visual Sensitivity High Management Opportunities Mange hedges and grazing. Mange recreational spaces and access to countryside. Need to retain gap between Maresfield and Uckfield. Potential for Mitigation Low Planting would change open character and obscure long views out from recreation ground Capacity to Accept Change: Housing Low Close to village edge only Capacity to Accept Change: Business Low 7.3.7 We contend that the record sheets are incorrect and the judgement on quality / condition is erroneous and should be ‘ordinary’ as most of the land is unmanaged comprising rank grassland of little intrinsic landscape value and the visual sensitivity of the area is ‘moderate or low’ due to the strong enclosure afforded to the area. It is interesting to note that one of the management opportunities is to retain a gap between Maresfield and Uckfield although there is no planning policy support for the retention of gaps in the Core Strategy or previous Non Statutory Wealden Local Plan. 7.3.8 By comparison, another example is Character Area L – land to the west of Uckfield, which is described as: ‘Land sloping away from urban edge to Uck valley and A26 Uckfield by pass. Strong field structure with arable and pasture. Some large fields. Sewage works detractors. Few focuses of character. Development would need a well defined edge to prevent creep’. 7.3.9 The assessment sheet for this character area has recorded the land cover and landscape elements correctly but has not recorded any landform features and relatively few aesthetic factors, although it describes the land as sloping away from the urban edge with a strong field structure with arable and pasture. The landscape condition is considered to be fair which is not defined in the methodology although this changes to ordinary in the comparison table. 7.3.10 In the visual appraisal section of the assessment sheet it records the local receptors as countryside on the other side of Uck Valley, isolated properties, footpaths and A26 and houses on the urban edge, types of view as views across to woods at West Park / Butchers Wood, wooded ridge of Shortbridge across Uckfield Valley and visual barriers as few. It concludes that the sensitivity is ‘moderate’ (see table 7.2). Table 7.2: Landscape Study Assessment, Uckfield Area L Character Area Uckfield L Quality Ordinary Value Medium Snaw Accessible for recreation Sensitivity to Change Moderate Visual Sensitivity Moderate High on ridge Management Opportunities Mange urban fringe. Farm diversification pressure. Manage wood and existing trees and hedges. Potential for Mitigation Moderate Low on ridge as need to retain open fields Soften urban edge. Create green network. Relocate recreation ground Capacity to Accept Change: Housing Moderate Need well defined boundaries close to urban edge avoid high ground Capacity to Accept Change: Business No capacity 7.3.11 We contend that the record sheets are incorrect and the judgement on quality / condition is under estimated and should be ‘good’ as most of the land is attractive farmed landscape with some distinctiveness features with a recognisable landscape structure. The assessment sheet ignores the open exposed nature of this character area, with long views south and west and numerous views in to the area from the surrounding countryside (roads and footpaths), and therefore the visual sensitivity of the area should be ‘high’ due the number of viewpoints where views can be obtained. This can be compared to the Maresfield A area which is considered to have ‘high’ sensitivity rating but with a few vantage points available where development impacts will be perceived. 7.3.12 We also note that under management opportunities it is considered that the area could contribute to managing the urban fringe, which could equally apply to the land at Maresfield, and that under the potential for mitigation heading is considered that the area has a ‘moderate’ ability, although the introduction of mitigate planting as shown Figure 11 of the landscape Study would dramatically and significantly change the landscape character of the area. 7.3.13 These examples illustrate the inconsistency of the landscape assessment record sheet and the arbitrary nature of the judgements made. It does not give any confidence to the manner in which the Landscape Study has been undertaken or to the transparent way that the judgements have been reached. 7.4 Implications for the soundness of the Core Strategy 7.4.1 We have reviewed the ‘Landscape Character Assessment and Development Option Evaluation Study’ of the district. It is not clear how this Landscape Study has been used to inform the spatial strategy as it is not specifically referred to in the Core Strategy, nor is the Landscape Study listed as a background paper at paragraph 1.7 of the Core Strategy (although it is included as a background paper on the Councils website). 7.4.2 We have reviewed the methodology set out in the document and we have also reviewed whether the methodology has been consistently applied resulting in a final report that is robust, thorough, and transparent and that it would form a credible evidence base suitable to inform the spatial strategy contained in the Core Strategy. The Study also includes a methodology employed to undertake a comparative evaluation of a potential development area within a character area which has capacity to accommodate development. 7.4.3 The examples referred to in our analysis above illustrate the inconsistency of the landscape assessment record sheets and arbitrary nature of the judgements made and it does not give any confidence to the manner in which the
Landscape Study has been undertaken or to the transparent way that the judgements have been reached. 7.4.4 We contend that the Landscape Study is flawed and therefore the assessment of housing sites in the district, the spatial strategy and the Councils Sustainability Appraisal is unsound. In addition, in relation to the comparison assessment of sites within the district surrounding the towns and villages; we contend that this comparative assessment of character areas is flawed as the starting point for the assessment the landscape sensitivity / capacity analysis is unsound for the reason given above. 7.4.5 The Core Strategy proposes that the land to the west of Uckfield be identified as a ‘strategic development area’ suitable for accommodating 1,000 homes and some 12,650 sq metres net of employment floor space and education provision as an extension to the urban area to the west of New Town. In the light of the comments made on the Landscape Study, it is considered that this proposal be reassessed and, (taking into account the other representations made on other parts and policies contained in the Core Strategy), greater emphasis be given to the suitability of land at Maresfield to accommodate increased housing numbers and a larger proportion of the housing requirements for the district. 7.4.6 Policy WSC13 relating to Green Infrastructure is supported although it is considered that the anomalies and errors in the Landscape Study be addressed before this document is used to inform and guide the implementation of Green Infrastructure Strategy and also formulation of the specific measures for the protection and enhancement of the landscape which are to set out in the Delivery and Site Allocations DPD referred to at paragraph 7.28 of the Core Strategy.

Details of Changes to be Made:

SUMMARY 7.4.7 In conclusion, we contend that the Core Strategy is unsound because: 1. It is not justified as it is not based on a sound evidence base as the Landscape Study (Landscape Character Assessment and Development Options Evaluation Study of the District) is flawed and therefore the assessment of housing sites in the district, the spatial strategy and the Councils Sustainability Appraisal is unsound. It is not clear how the Landscape Study has been used to inform the spatial strategy as it is not specifically referred to in the Core Strategy nor is the Landscape Study listed as a background paper at paragraph 1.7 of the Core Strategy; 2. It is not justified because the Landscape Study as it is not robust, thorough, and transparent and that it does not form a credible evidence base suitable to inform the spatial strategy contained in the Core Strategy. The Landscape Study contains a number inconsistencies set out in the landscape assessment record sheets and contains a number of arbitrary judgements and so it does not give any confidence to the manner in which the Landscape Study has been undertaken or to the transparent way that the judgements have been reached. 3. It is not consistent with national policy as the methodology for undertaking the Landscape Study (which has been used to inform the spatial strategy) refers to ‘AONB and AONB Buffer Zones’ as a way of identifying higher value landscapes. There are a number of reasons why this approach is unsound but there is no Government policy support for the concept of ‘AONB buffers’ in Planning Policy Statement No.7 or any other policy guidance.

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Details of Changes to be Made:

Representation ID
1311
Person ID  Mr  Ankers  Agent ID
106660  South Downs Society
Paragraph  3.31
Sound  Yes  No  Justified  Effective  Consistent with national policy
Legally Compliant  Yes  No

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Inform the preparation of WDC Local Development Framework Core Strategy and; 2. Inform the development policies on landscape management and protection. 7.2.2 The Landscape Study states that it will: 1. Assess the existing landscape character of key search areas 2. Assess the quality and value of the existing landscape in these key search areas 3. Assess the sensitivity if the existing landscape and its capacity to accept change or having regard to the scope for mitigation 4. Make recommendations on preferred locations from a landscape perspective. 7.2.3 The Landscape Study purports to use a number of methodologies for the assessment and
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Vol 11, section 3, Part 5 (DT) which has been further refined by the Landscape Character Assessment Guidance for England and Scotland (CA/SNH 2002) and; 2. For landscape sensitivity – Landscape Character Assessment Guidance for England and Scotland, Topic Paper No.6: Techniques and criteria for Judging Capacity and Sensitivity (CA 2002). 7.2.4 The Landscape Study sets out, in section 2.0, the methodology and criteria used for each aspect of the landscape being assessed, including the following: 1. Landscape Quality (this should be ‘condition’ if following latest LCA guidance as the term quality is now a discredited approach to assessing landscapes) 2. Landscape Value 3. Landscape Sensitivity 4. Visual Sensitivity 5. Landscape Capacity 7.2.5 In relation to the assessment of landscape capacity, capacity is defined in Topic Paper No.6: ‘Techniques and Criteria for Judging Capacity and Sensitivity’ as: ‘The degree to which a particular landscape type or area is able to accommodate change without significant effect on its character, or overall change of landscape character type. Capacity is likely to vary according to the type and nature of change being proposed’. 7.2.6 We have reviewed the Landscape Study, in particular, the methodology set out in the document and whether this has been consistently applied to form a credible evidence base suitable to inform the spatial strategy contained in the Core Strategy. 7.2.7 The review of the Core Strategy background paper indicates that the Landscape Study has not followed the guidance in Topic Paper No.6. Topic Paper No.6 suggests that there are two approaches to assessing landscape sensitivity. These are: 1. Judging Overall Landscape Sensitivity and; 2. Judging Landscape Sensitivity to a specific type of change. 7.2.8 However, in order to assess landscape capacity, the assessment of the sensitivity of different types or areas of landscape to the type of change in question must be combined with an assessment of the more subjective or perceptual aspects of the landscape and of the value attached to the landscape. 7.2.9 The stages for assessing landscape capacity of a landscape are set out in Section 3.0 of Topic Paper No.6 and reproduced in Figure 7.1 below. Figure 7.1: Stages for assessing landscape capacity Source: Landscape Character Assessment Guidance for England and Scotland, Topic Paper No.6: Techniques and criteria for Judging Capacity and Sensitivity (CA 2002) 7.2.10 Sections 5.0 and 6.0 of Topic Paper No.6 provide the more detailed considerations that need to be taken into account. 7.2.11 The boxed text, at paragraph 2.11.2 of the Landscape Study, follows the same assessment stages used to assess the landscape capacity to accommodate a specific type of change and given the local scale of the assessment work it is considered that this is the appropriate method to use. 7.2.12 However, Topic Paper No.6, at paragraph 6.5, also goes on to state that: ‘Capacity is all a question of the interaction between the sensitivity of the landscape, the type and amount of change and the way that the landscape is valued’. 7.2.13 Sections 2.11 and 2.12 of the Landscape Study set out the approach used by East Sussex County Council landscape group in undertaking the landscape study. However, the assessment does not define the quantum of housing development used to assess the capacity of each character area, nor is the LDF Core Issues and Options Consultation Paper July 2007 referred to as a guide to the quantum of housing development used to assess each of the different character areas. The Landscape Study does however state at paragraph 2.12.3 that: ‘an overall assessment can be made for each character area on the capacity to accept the type of change being considered. This judgement is made according to the combination of characteristics that contribute to a particular area of landscape. The capacity of an area to accept change is related to the potential of the area to accommodate development in a particular location without detracting from the overall character of that landscape. The capacity evaluation of each character area does not assume that this is the capacity across the entire character area’ 7.2.14 There are a number interrelated issues raised in the above paragraph which we now turn to. 7.2.15 In relation to the type of change, the Landscape Study defines, at paragraph 2.12.6, the assumptions used for the assessment business uses, i.e. the assessment of sensitivity / capacity is based on light industrial type uses which would be consistent with a residential environment and these would be single storey units. However the Landscape Study does not define the full details of the housing use, such as type (housing - single storey / two storey / three storey etc) or amount (large / medium / small scale development) and we contend that the details of the change being considered is not transparent from the Landscape Study, as although the type of change (i.e. housing) is known, the form and amount of housing is unknown. These are important factors when considering the landscape capacity of an area to accommodate development, especially if using the stages set in the Landscape Study. 7.2.16 A similar assumption to the business use (or range of assumptions) could have been used for assessing the impact of housing on landscape sensitivity / capacity of each character area. For example two to three storey houses at the following ranges: 1. small scale housing between five to 50 dwellings 2. medium scale housing development between 50 to 200 dwellings, and 3. large scale housing development between 200 to 500 dwellings. 7.2.17 In relation to the combination of the characteristics that contribute to a particular area, comments on these are made in later sections (See paragraphs 7.4.1 to 7.4.14 below). 7.2.18 The Landscape Study also refers to mitigation and management of the landscape (Section 2.13) and, in paragraph 2.13.1, it highlights that mitigation has been used to determine the visual and character sensitivity of the landscape. This approach does not accord with Topic Paper No.6 as mitigation should only be used to inform the visual sensitivity of the area assessed, (See Figure 7.1 above), and not directly the character sensitivity of an area (although visual aspects are one of the aspects that inform the character of an area). Mitigation in itself can have a significant effect on character and the landscapes capacity to accommodate development. In some cases mitigation would make an area less suitable to accommodate development not more suitable. Again this, we would contend, is a flaw in the assessment. The existing management of the landscape is relevant to determining the condition (or quality) of an area of landscape but the identification of management opportunities is not relevant to determining the capacity of the landscape to
accommodate development. Management of the land could in itself bring about a change to the landscape which is discordant with its character, for instance managing the land to encourage woodland growth or planting extensive woodlands in a very open exposed landscape would lead to a significant change. 7.2.19 The methodology section of the Landscape Study also includes a part dealing with the Areas of Outstanding Natural Beauty (AONB) within the district. Section 2.14 refers to ‘AONBs and AONB Buffer Zones’ as a way of identifying higher value landscapes within Wealden. At paragraph 2.14.2 the Landscape Study states: ‘There is, in some areas adjacent to the AONB boundary a buffer zone to the AONB landscape. This is usually an area of similar character but not of the same quality as the AONB landscape and not covered by the same planning policy. Where relevant these areas are indicated in the figures’. 7.2.20 Paragraph 2.14.4, the Landscape Study goes on the state the following: ‘These buffer zones have been identified through the character area analysis. The relative sensitivity of these areas has been considered according to the landscape character to achieve a balanced comparison with AONB and AONB landscapes’. 7.2.21 The Landscape Study considers that there is support for this ‘buffer zone’ approach due to Policy EN2 (f) of the East Sussex and Brighton and Hove Structure Plan. We contend that this approach is flawed and unsound. Firstly, the Structure Plan has been superseded by the South East Plan and at the time of preparing the Landscape Study during the period August 2007 to February 2009, both East Sussex County Council and Wealden District Council would have been aware of the emerging South East Plan policies through the draft regional plan. Secondly, Policy EN2 (f) does not prohibit development but seeks to protect the Sussex Downs and High Weald AONBs and minimise the impact of development within them by requiring measures to integrate the development in to the landscape. Thirdly, there is no Government policy support for the concept of ‘AONB buffers’ in Planning Policy Statement No.7. Like Policy EN2 of the Structure Plan, PPS 7 does not prohibit development within the boundaries or adjoining an AONB but merely seeks to ensure that the landscapes within AONBs are considered carefully and appropriate measures taken to mitigate the harm that potential development may cause. 7.2.22 The fourth point is that, whilst the Council would seek support from Policy EN2 (f) as a way of ‘balancing the comparison between AONB and non AONB areas’ especially the areas of landscape close to the AONB boundary, the East Sussex and Brighton and Hove Structure Plan does not define the extent of the buffer zone on the Key Diagram nor is the extent of the buffer area set out in its explanatory text. We contend that the justification for this approach must be given very little weight. 7.2.23 Lastly, it is acknowledged that some areas of landscape within an AONB may be of poorer condition (quality) score and/or lower visual and character sensitivity than areas outside of the AONB but the adjustment in the landscape sensitivity / capacity scoring by introducing what appears to be an arbitrary AONB buffer zone seems to undermine the purposes and status of the AONB designation,(and its planning policy protection), by attaching increased value to a character area that adjoins the AONB which although it may be of a similar character, does not meet the quality criteria for inclusion within the AONB. In addition, it is noted that the Landscape Study has not been subject to peer review and there is no evidence that it has had stakeholder input / consultation with statutory consultees, such Natural England / High Weald AONB Joint Advisory Committee and other interested bodies to agree this approach to the AONBs. 7.2.24 The Study goes on to set out the method used to undertake a comparative evaluation of a potential development area within a character area which has capacity to accommodate development. This gives an early indication of sites which would be worthy of further consideration for development in landscape terms. We contend that the comparative assessment of character areas within the District is flawed as the starting point for the assessment the landscape sensitivity / capacity analysis is unsound for the reason given above. 7.2.25 Notwithstanding the above point, Section 2.15.4 of the Landscape Study states that: ‘Prior to coming to a firm view on the full potential and scope in these areas further investigation would be required’. 7.2.26 However, the Study does not present evidence of this further investigation or how preferred development areas have been chosen; for example there is no detailed assessment of the west of Uckfield area although this has been identified as a major urban extension area under Policy WCS4 - SD1. 7.3 Critical Review of the findings of the Landscape Study 7.3.1 The Landscape Study methodology sets out how each landscape character is to be assessed and the information recorded using landscape character assessment sheets (section 2.5) whilst section 2.17 of the Landscape Study refers to mapping which is split into two stages. Stage 1 relates to recording baseline information on each character area such as planning designation, Public Right of Way and key viewpoint, focal point, landscape features and detractors (which should be read with the assessment record sheets). Stage 2 relates to the identification of potential development areas with indicative boundaries and also identifies key woods, shaws, hedges, tree belts etc and also the potential for mitigation planting. 7.3.2 In order to assess the robustness of the landscape capacity study for the purpose of this representation, the area around Uckfield, Maresfield and Five Ash Down were visited and the baseline information recorded on the landscape assessment sheets checked and the judgements reached reviewed. This check revealed that that were a number of elements / features not recorded or identified for some areas and therefore these factors were not able to inform the judgement reached. 7.3.3 For example, ‘Maresfield Area A’, is described as: ‘An open, undulating landscape used for pasture to the west and pleasure to the east. It is ungrazed showing some scrub. Wide long views to the south. Surrounded on other sides by mature trees and exotic Eucalyptus and Cedars from nearby Park. Fine houses on outskirts and within site. Fine clumps of Pines. Some road noise adjoins picturesque recreation ground’. 7.3.4 The assessment sheet omits a number of important features such as areas of woodlands and plantations, (some of which are ancient woodlands and provide screening, containment and form visual barriers). Hedges, fences, footpaths and reference to the bypass were not recorded. The assessment sheet also refers to parkland and that the majority of the land is amenity land lacking management. A wide long view(s) out to
the south is highlighted as a key feature which is correct when looking south from a small part of the area but elsewhere views are contained and obscured by landform and vegetation. The record sheet includes a photograph of the view south but this is not taken from the recreation ground as recorded on the map Figure 52. The photograph was taken from private land on the footpath. 7.3.5 In the visual appraisal section of the assessment sheet it records the local receptors as amenity land and houses, types of view as long views from top of ridge to the south and visual barriers as landform / trees and hedges. It concludes that the sensitivity is high (see table 7.1 below). It is acknowledged that there are views within the area but these tend to be short partial or glimpsed views with long views out towards the south from high ground in the north eastern parts of character area. Views into the area are very limited and development within the area would have a minimal impact on views. However, in views from the ridge to the south the recreation occupying the north eastern parts of the character area is seen whilst the remaining areas are hidden from view and therefore the visual sensitivity of the majority of the area is low. 7.3.6 The resultant evaluation of this area was considered as follows: Table 7.1: Landscape Study Assessment, Maresfield Area A Character Area Maresfield A Quality Good Value Medium Sensitivity to Change Moderate Visual Sensitivity High Management Opportunities Mange hedges and grazing. Mange recreational spaces and access to countryside. Need to retain gap between Maresfield and Uckfield. Potential for Mitigation Low Planting

By comparison, another example is Character Area L – land to the west of Uckfield, which is described as: 'Land sloping away from urban edge to Uck valley and A26 Uckfield by pass. Strong field structure with arable and pasture. Some large fields. Sewage works detractors. Few focuses of character. Development would need a well defined edge to prevent creep'. 7.3.9 The assessment sheet for this character area has recorded the land cover and landscape elements correctly but has not recorded any landform features and relatively few aesthetic factors, although it describes the land as sloping away from the urban edge with a strong field structure with arable and pasture. The landscape condition is considered to be fair which is not defined in the methodology although this changes to ordinary in the comparison table. 7.3.10 In the visual appraisal section of the assessment sheet it records the local receptors as countryside on the other side of Uck Valley, isolated properties, footpaths and A26 and houses on the urban edge, types of view as views across to woods at West Park / Butchers Wood, wooded ridge of Shortbridge across Uckfield Valley and visual barriers as few. It concludes that the sensitivity is 'moderate' (see table 7.2). Table 7.2: Landscape Study Assessment, Uckfield Area L Character Area Uckfield L Quality Ordinary Value Medium Snaw Accessible for recreation Sensitivity to Change Moderate Visual Sensitivity Moderate High on ridge Management Opportunities Mange urban fringe. Farm diversification pressure. Manage wood and existing trees and hedges. Potential for Mitigation Moderate Low on ridge as need to retain open fields. Soften urban edge. Create green network. Relocate recreation ground Capacity to Accept Change: Housing Moderate Need well defined boundaries close to urban edge avoid high ground Capacity to Accept Change: Business No capacity 7.3.11 We contend that the record sheets are incorrect and the judgement on quality / condition is erroneous and should be ‘ordinary’ as most of the land is unmanaged comprising rank grassland of little intrinsic landscape value and the visual sensitivity of the area is ‘moderate or low’ due to the strong enclosure afforded to the area. It is interesting to note that one of the management opportunities is to retain a gap between Maresfield and Uckfield although there is no planning policy support for the retention of gaps in the Core Strategy or previous Non Statutory Wealden Local Plan. 7.3.8 By comparison, another example is Character Area L – land to the west of Uckfield, which is described as: 'Land sloping away from urban edge to Uck valley and A26 Uckfield by pass. Strong field structure with arable and pasture. Some large fields. Sewage works detractors. Few focuses of character. Development would need a well defined edge to prevent creep'. 7.3.9 The assessment sheet for this character area has recorded the land cover and landscape elements correctly but has not recorded any landform features and relatively few aesthetic factors, although it describes the land as sloping away from the urban edge with a strong field structure with arable and pasture. 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Soften urban edge. Create green network. Relocate recreation ground Capacity to Accept Change: Housing Moderate Need well defined boundaries close to urban edge avoid high ground Capacity to Accept Change: Business No capacity 7.3.11 We contend that the record sheets are incorrect and the judgement on quality / condition is under estimated and should be ‘good’ as most of the land is attractive farmed landscape with some distinctiveness features with a recognisable landscape structure. The assessment sheet ignores the open exposed nature of this character area, with long views south and west and numerous views in to the area from the surrounding countryside (roads and footpaths), and therefore the visual sensitivity of the area should be ‘high’ due the number of viewpoints where views can be obtained. This can be compared to the Maresfield A area which is considered to have ‘high’ sensitivity rating but with a few vantage points available where development impacts will be perceived. 7.3.12 We also note that under management opportunities it is considered that the area could contribute to managing the urban fringe, which could equally apply to the land at Maresfield, and that under the potential for mitigation heading is considered that the area has a ‘moderate’ ability, although the introduction of mitigate planting as shown Figure 11 of the landscape Study would dramatically and significantly change the landscape character of the area. 7.3.13 These examples illustrate the inconsistency of the landscape assessment record sheet and the arbitrary nature of the judgements made. It does not give any confidence to the manner in which the Landscape Study has been undertaken or to the transparent way that the judgements have been reached. 7.4 Implications for the soundness of the Core Strategy 7.4.1 We have reviewed the ‘Landscape Character Assessment and Development Option Evaluation Study’ of the district. It is not clear how this Landscape Study has been used to inform the spatial strategy as it is not specifically referred to in the Core Strategy, nor is the Landscape Study listed as a background paper at paragraph 1.7 of the Core Strategy (although it is included as a background paper on the Councils website). 7.4.2 We have reviewed the methodology set out in the document and we have also reviewed whether the methodology has been consistently applied resulting in a final report that is robust, thorough, and transparent and that it would form a credible evidence base suitable to inform the spatial strategy contained in the Core Strategy. The Study also includes a methodology employed to undertake a comparative evaluation of a potential development area within a character area which has capacity to accommodate development. 7.4.3 The examples referred to in our analysis above illustrate the inconsistency of the landscape assessment record sheets and arbitrary nature of the judgements made and it does not give any confidence to the manner in which the
Landscape Study has been undertaken or to the transparent way that the judgements have been reached. 7.4.4 We contend that the Landscape Study is flawed and therefore the assessment of housing sites in the district, the spatial strategy and the Councils Sustainability Appraisal is unsound. In addition, in relation to the comparison assessment of sites within the district surrounding the towns and villages; we contend that this comparative assessment of character areas is flawed as the starting point for the assessment the landscape sensitivity / capacity analysis is unsound for the reason given above. 7.4.5 The Core Strategy proposes that the land to the west of Uckfield be identified as a ‘strategic development area’ suitable for accommodating 1,000 homes and some 12,650 sq metres net of employment floor space and education provision as an extension to the urban area to the west of New Town. In the light of the comments made on the Landscape Study, it is considered that this proposal be reassessed and, (taking into account the other representations made on other parts and policies contained in the Core Strategy), greater emphasis be given to the suitability of land at Maresfield to accommodate increased housing numbers and a larger proportion of the housing requirements for the district. 7.4.6 Policy WSC13 relating to Green Infrastructure is supported although it is considered that the anomalies and errors in the Landscape Study be addressed before this document is used to inform and guide the implementation of Green Infrastructure Strategy and also formulation of the specific measures for the protection and enhancement of the landscape which are to set out in the Delivery and Site Allocations DPD referred to at paragraph 7.28 of the Core Strategy.

Details of Changes to be Made:

SUMMARY 7.4.7 In conclusion, we contend that the Core Strategy is unsound because: 1. It is not justified as it is not based on a sound evidence base as the Landscape Study (Landscape Character Assessment and Development Options Evaluation Study of the District) is flawed and therefore the assessment of housing sites in the district, the spatial strategy and the Councils Sustainability Appraisal is unsound. It is not clear how the Landscape Study has been used to inform the spatial strategy as it is not specifically referred to in the Core Strategy nor is the Landscape Study listed as a background paper at paragraph 1.7 of the Core Strategy; 2. It is not justified because the Landscape Study as it is not robust, thorough, and transparent and that it does not form a credible evidence base suitable to inform the spatial strategy contained in the Core Strategy. The Landscape Study contains a number inconsistencies set out in the landscape assessment record sheets and contains a number of arbitrary judgements and so it does not give any confidence to the manner in which the Landscape Study has been undertaken or to the transparent way that the judgements have been reached 3. It is not consistent with national policy as the methodology for undertaking the Landscape Study (which has been used to inform the spatial strategy) refers to ‘AONB and AONB Buffer Zones’ as a way of identifying higher value landscapes. There are a number of reasons why this approach is unsound but there is no Government policy support for the concept of ‘AONB buffers’ in Planning Policy Statement No.7 or any other policy guidance.
Details of Reasons for Soundness/ Legal Compliance:

We feel that the proposed avoidance and mitigation measures of SANGS and contributions for onsite access management will ensure that housing within 7km will not have a likely significant impact on Ashdown Forest.

Details of Changes to be Made:

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Details of Reasons for Soundness/ Legal Compliance:

It should be recognised in these sections that Ashdown Forest is also a Special Area of Conservation (SAC) for its habitat of Northern Atlantic wet heaths and European dry heaths. The SAC interest is also relevant for the proposed 400 metre exclusion zone for net increases in dwellings as the potential impacts from this area also include SAC damaging activities such as garden encroachment and bonfires etc and not just recreational pressure. The wording of Section 3.32 should be amended to take this into account.

Details of Changes to be Made:

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Details of Reasons for Soundness/ Legal Compliance:

Environment: this section surprisingly omits any specific mention of the downs - other than within Lewes District! This should be rectified.

Details of Changes to be Made:
### Summary of all Representations - Proposed Submission Core Strategy Regulation 27 - Report 11th July 2011

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<td>Officers at Mid Sussex District Council are continuing to work jointly with Wealden in developing and implementing a strategic and co-ordinated approach to protecting the Ashdown Forest SAC/SPA. Work already undertaken between the two Councils has identified a series of measures to limit the impact of new development on the conservation interests of the Ashdown Forest. These measures include new development contributing to an appropriate level of mitigation in the form of providing Suitable Alternative Natural Green Space (SANGS) and support via developer contributions towards the Ashdown Forest Access Management Strategy. This strategy will need to specify measures for the management of visitors to Ashdown Forest in such a way that reduces their impact on the interest features of the designated site and will need be prepared and implemented in association with the conservators of Ashdown Forest, Natural England and other partners. In addition, further joint working will be required to develop and implement site management measures to reduce nitrogen emissions emanating from the increased number of vehicles using the roads crossing Ashdown Forest. In combination with this, both Councils through their Local Development Frameworks will also need to deliver initiatives to reduce reliance on the motor vehicle, through creating sustainable communities, providing improvements to public transport, cycling and walking facilities. Pollution monitoring on the Forest will be required to assess the effectiveness of these measures. The recognition of this situation in paragraphs 3.22 6.34 and policy SPO1 is welcomed. The recognition within the Core Strategy of the impact on the Ashdown Forest that development within rural villages (such as Forest Road and Danehill) would have is welcomed. The strategy focusing growth at Uckfield, Crowborough, Heathfield and Hailsham and smaller- scale growth at villages within the Wealden District will go some way to minimising the negative impact development would have on the Ashdown Forest, especially in combination with further mitigation measures (such as SANGS).</td>
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<td>Policies to restrain traffic, obtain modal shift in travel, reducing need to travel and improve the experience of non-car travel need to be sharpened and focused. Aspirations for these to happen must have necessary circumstances incorporated into the policies.</td>
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### Details of Changes to be Made:

**Yes**

### Details of Changes to be Made:

**Demand management techniques for traffic in Hailsham (6.15) should be included in all the related and equivalent policies. There should be a definite commitment to traffic reduction measures and targets throughout the Strategy Plan document.**
Details of Reasons for Soundess/ Legal Compliance:
The references to ‘dispersed settlement pattern’ in Wealden, with 93 per cent of the district containing half of its population are misleading, so affecting the policies derived from that thinking. It ignores the significance of nucleated villages as well as the main towns.

Details of Changes to be Made:
The settlement pattern seen as ‘dispersed’ for half of the population needs refining in the document. The proportions of those living in places larger than 500 and 1,000 should be identified. There is great scope for serving these by public transport evolving from the present network, with limited strict dependence on cars.
Section of Core Strategy: Spatial Planning Objectives 1, 3 and 11, Paragraphs 3.30 - 3.33, Policy WCS4 Strategic Development Areas, Framework. The Landscape Study is not listed as a background paper at paragraph 1.7 of the Core Strategy (although it is included as a background paper on the Councils website). Policy WCS4 Strategic Development Areas and Paragraphs 6.9 and 6.11, Policy WSC13 Green Infrastructure, Paragraphs 7.23 - 7.28Legally Compliant: -Sound: NoJustified: NoEffective: -Consistent with national policy No Proposed Submission Core Strategy Paragraphs 3.30 – 3.33 7.1.6 Paragraph 3.30 of the Proposed Submission Core Strategy refers to Wealden’s environmental attributes and that they have an important part to play in the development of the spatial strategy and ‘had a significant impact upon the assessment of the suitability of housing land in relation to the SHLAA’. 7.1.7 Paragraph 3.30 goes on to state that: “...and sites have been carefully scrutinised with regards to landscape impact.” 7.1.8 Paragraph 3.33 refers to Government guidance and the level of protection this provides for the environment, particularly nationally and internationally designated sites, which are not duplicated in the Core Strategy. The paragraph goes on to state: “However, our strategy has been guided by high levels of protection on local and national levels, and more detailed policies are contained within the Core Strategy and further ones in subsequent DPDs.” 7.1.9 Paragraph 1.7 in the Introduction to the Core Strategy refers to a number of specialist studies that have been produced to provide a robust evidence base to inform the Local Development Framework. The Landscape Study is not listed as a background paper at paragraph 1.7 of the Core Strategy (although it is included as a background paper on the Councils website). Policy WCS4 Strategic Development Areas and Paragraphs 6.9 and 6.11 7.1.10 The Core Strategy proposes that the land to the west of Uckfield be identified as a ‘strategic development area’ suitable for accommodating 1,000 homes and some 12,650 sq metres net of employment floor space and education provision as an extension to the urban area to the west of New Town. Paragraph 6.9 refers to the SHLAA and assessment of the potential sites at the fringes of the urban area. 7.1.11 In the light of the comments that follow in this section of our representations on the Landscape Study, it considered that this proposal be reassessed and, taking into account other representations made on other parts and policies contained in the Core Strategy, greater emphasis should be given to the suitability of land at Maresfield to accommodate increased housing numbers and a larger proportion of the housing requirements for the district. Policy WSC13 Green Infrastructure, Paragraphs 7.23 - 7.28 and Background Paper BP6 7.1.12 Policy WSC13 and paragraph 7.23 to 7.28 relating to Green Infrastructure is supported although it is considered that the anomalies and errors in the Landscape Study be addressed before this document is used to inform and guide the implementation of Green Infrastructure Strategy and also formulation of the specific measures for the protection and enhancement of the landscape which are to be set out in the Delivery and Site Allocations DPD referred to at paragraph 7.28 of the Core Strategy. 7.1.13 It is not clear from reading the Core Strategy, how the Landscape Study has been used to inform the above policies. 7.2 Consideration of the Methodology employed in the Landscape Study 7.2.1 Wealden Council commissioned the Landscape Study from the Landscape Group at East Sussex County Council, in September 2007. It was published in February 2009. The purpose of the Study is to: 1. Inform the preparation of WDC Local Development Framework Core Strategy and; 2. Inform the development policies on landscape management and protection. 7.2.2 The Landscape Study states that it will: 1. Assess the existing landscape character of key search areas 2. Assess the quality and value of the existing landscape in these key search areas 3. Assess the sensitivity if the existing landscape and its capacity to accept change or having regard to the scope for mitigation 4. Make recommendations on preferred locations from a landscape perspective. 7.2.3 The Landscape Study purports to use a number of methodologies for the assessment and
identifies these as being: 1. For Landscape Character/ Quality and Value - Design Manual for Roads and Bridges Vol 11, section 3, Part 5 (DT) which has been further refined by the Landscape Character Assessment Guidance for England and Scotland (CA/SNH 2002) and; 2. For landscape sensitivity – Landscape Character Assessment Guidance for England and Scotland, Topic Paper No.6: Techniques and criteria for Judging Capacity and Sensitivity (CA 2002). 7.2.4 The Landscape Study sets out, in section 2.0, the methodology and criteria used for each aspect of the landscape being assessed, including the following: 1. Landscape Quality (this should be ‘condition’ if following latest LCA guidance as the term quality is now a discredited approach to assessing landscapes) 2. Landscape Value 3. Landscape Sensitivity 4. Visual Sensitivity 5. Landscape Capacity 7.2.5 In relation to the assessment of landscape capacity, capacity is defined in Topic Paper No.6: ‘Techniques and Criteria for Judging Capacity and Sensitivity’ as: ‘The degree to which a particular landscape type or area is able to accommodate change without significant effect on its character, or overall change of landscape character type. Capacity is likely to vary according to the type and nature of change being proposed’. 7.2.6 We have reviewed the Landscape Study, in particular, the methodology set out in the document and whether this has been consistently applied to form a credible evidence base suitable to inform the spatial strategy contained in the Core Strategy. 7.2.7 The review of the Core Strategy background paper indicates that the Landscape Study has not followed the guidance in Topic Paper No.6. Topic Paper No.6 suggests that there are two approaches to assessing landscape sensitivity. These are: 1. Judging Overall Landscape Sensitivity and; 2. Judging Landscape Sensitivity to a specific type of change. 7.2.8 However, in order to assess landscape capacity, the assessment of the sensitivity of different types or areas of landscape to the type of change in question must be combined with an assessment of the more subjective or perceptual aspects of the landscape and of the value attached to the landscape. 7.2.9 The stages for assessing landscape capacity of a landscape are set out in Section 3.0 of Topic Paper No.6 and reproduced in Figure 7.1 below. Figure 7.1: Stages for assessing landscape capacity Source: Landscape Character Assessment Guidance for England and Scotland, Topic Paper No.6: Techniques and criteria for Judging Capacity and Sensitivity (CA 2002) 7.2.10 Sections 5.0 and 6.0 of Topic Paper No.6 provide the more detailed considerations that need to be taken into account. 7.2.11 The boxed text, at paragraph 2.11.2 of the Landscape Study, follows the same assessment stages used to assess the landscape capacity to accommodate a specific type of change and given the local scale of the assessment work it is considered that this is the appropriate method to use. 7.2.12 However, Topic Paper No.6, at paragraph 6.5, also goes on to state that: ‘Capacity is all a question of the interaction between the sensitivity of the landscape, the type and amount of change and the way that the landscape is valued’. 7.2.13 Sections 2.11 and 2.12 of the Landscape Study set out the approach used by East Sussex County Council landscape group in undertaking the landscape study. However, the assessment does not define the quantum of housing development used to assess the capacity of each character area, nor is the LDF Core Issues and Options Consultation Paper July 2007 referred to as a guide to the quantum of housing development used to assess each of the different character areas. The Landscape Study does however state at paragraph 2.12.3 that: ‘an overall assessment can be made for each character area on the capacity to accept the type of change being considered. This judgement is made according to the combination of characteristics that contribute to a particular area of landscape. The capacity of an area to accept change is related to the potential of the area to accommodate development in a particular location without detracting from the overall character of that landscape. The capacity evaluation of each character area does not assume that this is the capacity across the entire character area’ 7.2.14 There are a number interrelated issues raised in the above paragraph which we now turn to. 7.2.15 In relation to the type of change, the Landscape Study defines, at paragraph 2.12.6, the assumptions used for the assessment business uses, i.e. the assessment of sensitivity / capacity is based on light industrial type uses which would be consistent with a residential environment and these would be single storey units. However the Landscape Study does not define the full details of the housing use, such as type (housing - single storey / two storey / three storey etc) or amount (large / medium / small scale development) and we contend that the details of the change being considered is not transparent from the Landscape Study, although the type of change (i.e. housing) is known, the form and amount of housing is unknown. These are important factors when considering the landscape capacity of an area to accommodate development, especially if using the stages set in the Landscape Study. 7.2.16 A similar assumption to the business use (or range of assumptions) could have been used for assessing the impact of housing on landscape sensitivity / capacity of each character area. For example two to three storey houses at the following ranges: 1. small scale housing between five to 50 dwellings 2. medium scale housing development between 50 to 200 dwellings, and 3. large scale housing development between 200 to 500 dwellings. 7.2.17 In relation to the combination of the characteristics that contribute to a particular area, comments on these are made in later sections (See paragraphs 7.4.1 to 7.4.14 below). 7.2.18 The Landscape Study also refers to mitigation and management of the landscape (Section 2.13) and, in paragraph 2.13.1, it highlights that mitigation has been used to determine the visual and character sensitivity of the landscape. This approach does not accord with Topic Paper No.6 as mitigation should only be used to inform the visual sensitivity of the area assessed, (See Figure 7.1 above), and not directly the character sensitivity of an area (although visual aspects are one of the aspects that inform the character of an area). Mitigation in itself can have a significant effect on character and the landscapes capacity to accommodate development. In some cases mitigation would make an area less suitable to accommodate development not more suitable. Again this, we would contend, is a flaw in the assessment. The existing management of the landscape is relevant to determining the condition (or quality) of an area of landscape but the identification of management opportunities is not relevant to determining the capacity of the landscape to
accommodate development. Management of the land could in itself bring about a change to the landscape which is discordant with its character, for instance managing the land to encourage woodland growth or planting extensive woodlands in a very open exposed landscape would lead to a significant change. 7.2.19 The methodology section of the Landscape Study also includes a part dealing with the Areas of Outstanding Natural Beauty (AONB) within the district. Section 2.14 refers to ‘AONBs and AONB Buffer Zones’ as a way of identifying higher value landscapes within Wealden. At paragraph 2.14.2 the Landscape Study states: ‘There is, in some areas adjacent to the AONB boundary a buffer zone to the AONB landscape. This is usually an area of similar character but not of the same quality as the AONB landscape and not covered by the same planning policy. Where relevant these areas are indicated in the figures’. 7.2.20 Paragraph 2.14.4, the Landscape Study goes on the state the following: ‘These buffer zones have been identified through the character area analysis. The relative sensitivity of these areas has been considered according to the landscape character to achieve a balanced comparison with AONB and AONB landscapes’. 7.2.21 The Landscape Study considers that there is support for this ‘buffer zone’ approach due to Policy EN2 (f) of the East Sussex and Brighton and Hove Structure Plan. We contend that this approach is flawed and unsound. Firstly, the Structure Plan has been superseded by the South East Plan and at the time of preparing the Landscape Study during the period August 2007 to February 2009, both East Sussex County Council and Wealden District Council would have been aware of the emerging South East Plan policies through the draft regional plan. Secondly, Policy EN2 (f) does not prohibit development but seeks to protect the Sussex Downs and High Weald AONBs and minimise the impact of development within them by requiring measures to integrate the development into the landscape. Thirdly, there is no Government policy support for the concept of ‘AONB buffers’ in Planning Policy Statement No.7. Like Policy EN2 of the Structure Plan, PPS 7 does not prohibit development within the boundaries or adjoining an AONB but merely seeks to ensure that the landscapes within AONBs are considered carefully and appropriate measures taken to mitigate the harm that potential development may cause. 7.2.22 The fourth point is that, whilst the Council would seek support from Policy EN2 (f) as a way of ‘balancing the comparison between AONB and non AONB areas’ especially the areas of landscape close to the AONB boundary, the East Sussex and Brighton and Hove Structure Plan does not define the extent of the buffer zone on the Key Diagram nor is the extent of the buffer area set out in its explanatory text. We contend that the justification for this approach must be given very little weight. 7.2.23 Lastly, it is acknowledged that some areas of landscape within an AONB may be of poorer condition (quality) score and / or lower visual and character sensitivity than areas outside of the AONB but the adjustment in the landscape sensitivity / capacity scoring by introducing what appears to be an arbitrary AONB buffer zone seems to undermine the purposes and status of the AONB designation, (and its planning policy protection), by attaching increased value to a character area that adjoins the AONB which although it may be of a similar character, does not meet the quality criteria for inclusion within the AONB. In addition, it is noted that the Landscape Study has not been subject to peer review and there is no evidence that it has had stakeholder input / consultation with statutory consultees, such Natural England / High Weald AONB Joint Advisory Committee and other interested bodies to agree this approach to the AONBs. 7.2.24 The Study goes on to set out the method used to undertake a comparative evaluation of a potential development area within a character area which has capacity to accommodate development. This gives an early indication of sites which would be worthy of further consideration for development in landscape terms. We contend that the comparative assessment of character areas within the District is flawed as the starting point for the assessment the landscape sensitivity / capacity analysis is unsound for the reason given above. 7.2.25 Notwithstanding the above point, Section 2.15.4 of the Landscape Study states that: ‘Prior to coming to a firm view on the full potential and scope in these areas further investigation would be required’. 7.2.26 However, the Study does not present evidence of this further investigation or how preferred development areas have been chosen; for example there is no detailed assessment of the west of Uckfield area although this has been identified as a major urban extension area under Policy WCS4 - SD1. 7.3 Critical Review of the findings of the Landscape Study 7.3.1 The Landscape Study methodology sets out how each landscape character is to be assessed and the information recorded using landscape character assessment sheets (section 2.5) whilst section 2.17 of the Landscape Study refers to mapping which is split into two stages. Stage 1 relates to recording baseline information on each character area such as planning designation, Public Right of Way and key viewpoint, focal point, landscape features and detractors (which should be read with the assessment record sheets). Stage 2 relates to the identification of potential development areas with indicative boundaries and also identifies key woods, shaws, hedges, tree belts etc and also the potential for mitigation planting. 7.3.2 In order to assess the robustness of the landscape capacity study for the purpose of this representation, the area around Uckfield, Maresfield and Five Ash Down were visited and the baseline information recorded on the landscape assessment sheets checked and the judgements reached reviewed. This check revealed that that were a number of elements / features not recorded or identified for some areas and therefore these factors were not able to inform the judgement reached. 7.3.3 For example, ‘Maresfield Area A’, is described as: ‘An open, undulating landscape used for pasture to the west and pleasure to the east. It is ungrazed showing some scrub. Wide long views to the south. Surrounded on other sides by mature trees and exotic Eucalyptus and Cedars from nearby Park. Fine houses on outskirts and within site. Fine clumps of Pines. Some road noise adjoins picturesque recreation ground’. 7.3.4 The assessment sheet omits a number of important features such as areas of woodlands and plantations, (some of which are ancient woodlands and provide screening, containment and form visual barriers). Hedges, fences, footpaths and reference to the bypass were not recorded. The assessment sheet also refers to parkland and that the majority of the land is amenity land lacking management. A wide long view(s) out to
the south is highlighted as a key feature which is correct when looking south from a small part of the area but elsewhere views are contained and obscured by landform and vegetation. The record sheet includes a photograph of the view south but this is not taken from the recreation ground as recorded on the map Figure 52. The photograph was taken from private land on the footpath. 7.3.5 In the visual appraisal section of the assessment sheet it records the local receptors as amenity land and houses, types of view as long views from top of ridge to the south and visual barriers as landform / trees and hedges. It concludes that the sensitivity is high (see table 7.1 below). It is acknowledged that there are views within the area but these tend to be short partial or glimpsed views with long views out towards the south from high ground in the north eastern parts of character area. Views into the area are very limited and development within the area would have a minimal impact on views. However, in views from the ridge to the south the recreation occupying the north eastern parts of the character area is seen whilst the remaining areas are hidden from view and therefore the visual sensitivity of the majority of the area is low. 7.3.6 The resultant evaluation of this area was considered as follows: Table 7.1: Landscape Study Assessment, Maresfield Area A Character Area Maresfield A Quality Good Value Medium Sensitivity to Change Moderate Visual Sensitivity High Management Opportunities Mange hedges and grazing. Mange recreational spaces and access to countryside. Need to retain gap between Maresfield and Uckfield. Potential for Mitigation LowPlanting would change open character and obscure long views out from recreation ground Capacity to Accept Change: Housing LowClose to village edge only Capacity to Accept Change: Business Low 7.3.7 We contend that the record sheets are incorrect and the judgement on quality / condition is erroneous and should be ‘ordinary’ as most of the land is unmanaged comprising rank grassland of little intrinsic landscape value and the visual sensitivity of the area is ‘moderate or low’ due to the strong enclosure afforded to the area. It is interesting to note that one of the management opportunities is to retain a gap between Maresfield and Uckfield although there is no planning policy support for the retention of gaps in the Core Strategy or previous Non Statutory Wealden Local Plan. 7.3.8 By comparison, another example is Character Area L – land to the west of Uckfield, which is described as: ‘Land sloping away from urban edge to Uck valley and A26 Uckfield by pass. Strong field structure with arable and pasture. Some large fields. Sewage works detractors. Few focuses of character. Development would need a well defined edge to prevent creep’. 7.3.9 The assessment sheet for this character area has recorded the land cover and landscape elements correctly but has not recorded any landform features and relatively few aesthetic factors, although it describes the land as sloping away from the urban edge with a strong field structure with arable and pasture. The landscape condition is considered to be fair which is not defined in the methodology although this changes to ordinary in the comparison table. 7.3.10 In the visual appraisal section of the assessment sheet it records the local receptors as countryside on the other side of Uck Valley, isolated properties, footpaths and A26 and houses on the urban edge, types of view as views across to woods at West Park / Butchers Wood, wooded ridge of Shortbridge across Uckfield Valley and visual barriers as few. It concludes that the sensitivity is ‘moderate’ (see table 7.2). Table 7.2: Landscape Study Assessment, Uckfield Area L Character Area Uckfield L Quality Ordinary Value MediumSnawAccessible for recreation Sensitivity to Change Moderate Visual Sensitivity Moderate High on ridge Management Opportunities Mange urban fringe.Farm diversification pressure.Manage wood and existing trees and hedges Potential for Mitigation ModerateLow on ridge as need to retain open fieldsSof ten urban edge. Create green network.Relocate recreation ground Capacity to Accept Change: Housing ModerateNeed well defined boundaries close to urban edge avoid high ground Capacity to Accept Change: Business No capacity 7.3.11 We contend that the record sheets are incorrect and the judgement on quality / condition is under estimated and should be ‘good’ as most of the land is attractive farmed landscape with some distinctiveness features with a recognisable landscape structure. The assessment sheet ignores the open exposed nature of this character area, with long views south and west and numerous views in to the area from the surrounding countryside (roads and footpaths), and therefore the visual sensitivity of the area should be ‘high’ due the number of viewpoints where views can be obtained. This can be compared to the Maresfield A area which is considered to have ‘high’ sensitivity rating but with a few vantage points available where development impacts will be perceived. 7.3.12 We also note that under management opportunities it is considered that the area could contribute to managing the urban fringe, which could equally apply to the land at Maresfield, and that under the potential for mitigation heading is considered that the area has a ‘moderate’ ability, although the introduction of mitigate planting as shown Figure 11 of the landscape Study would dramatically and significantly change the landscape character of the area. 7.3.13 These examples illustrate the inconsistency of the landscape assessment record sheet and the arbitrary nature of the judgements made. It does not give any confidence to the manner in which the Landscape Study has been undertaken or to the transparent way that the judgements have been reached. 7.4 Implications for the soundness of the Core Strategy 7.4.1 We have reviewed the ‘Landscape Character Assessment and Development Option Evaluation Study’ of the district. It is not clear how this Landscape Study has been used to inform the spatial strategy as it is not specifically referred to in the Core Strategy, nor is the Landscape Study listed as a background paper at paragraph 1.7 of the Core Strategy (although it is included as a background paper on the Councils website). 7.4.2 We have reviewed the methodology set out in the document and we have also reviewed whether the methodology has been consistently applied resulting in a final report that is robust, thorough, and transparent and that it would form a credible evidence base suitable to inform the spatial strategy contained in the Core Strategy. The Study also includes a methodology employed to undertake a comparative evaluation of a potential development area within a character area which has capacity to accommodate development. 7.4.3 The examples referred to in our analysis above illustrate the inconsistency of the landscape assessment record sheets and arbitrary nature of the judgements made and it does not give any confidence to the manner in which the
Landscape Study has been undertaken or to the transparent way that the judgements have been reached. 7.4.4 We contend that the Landscape Study is flawed and therefore the assessment of housing sites in the district, the spatial strategy and the Councils Sustainability Appraisal is unsound. In addition, in relation to the comparison assessment of sites within the district surrounding the towns and villages; we contend that this comparative assessment of character areas is flawed as the starting point for the assessment the landscape sensitivity / capacity analysis is unsound for the reason given above. 7.4.5 The Core Strategy proposes that the land to the west of Uckfield be identified as a ‘strategic development area’ suitable for accommodating 1,000 homes and some 12,650 sq metres net of employment floor space and education provision as an extension to the urban area to the west of New Town. In the light of the comments made on the Landscape Study, it is considered that this proposal be reassessed and, (taking into account the other representations made on other parts and policies contained in the Core Strategy), greater emphasis be given to the suitability of land at Maresfield to accommodate increased housing numbers and a larger proportion of the housing requirements for the district. 7.4.6 Policy WSC13 relating to Green Infrastructure is supported although it is considered that the anomalies and errors in the Landscape Study be addressed before this document is used to inform and guide the implementation of Green Infrastructure Strategy and also formulation of the specific measures for the protection and enhancement of the landscape which are to set out in the Delivery and Site Allocations DPD referred to at paragraph 7.28 of the Core Strategy. ’

Details of Changes to be Made:
SUMMARY 7.4.7 In conclusion, we contend that the Core Strategy is unsound because: 1. It is not justified as it is not based on a sound evidence base as the Landscape Study (Landscape Character Assessment and Development Options Evaluation Study of the District) is flawed and therefore the assessment of housing sites in the district, the spatial strategy and the Councils Sustainability Appraisal is unsound. It is not clear how the Landscape Study has been used to inform the spatial strategy as it is not specifically referred to in the Core Strategy nor is the Landscape Study listed as a background paper at paragraph 1.7 of the Core Strategy; 2. It is not justified because the Landscape Study as it is not robust, thorough, and transparent and that it does not form a credible evidence base suitable to inform the spatial strategy contained in the Core Strategy. The Landscape Study contains a number inconsistencies set out in the landscape assessment record sheets and contains a number of arbitrary judgements and so it does not give any confidence to the manner in which the Landscape Study has been undertaken or to the transparent way that the judgements have been reached. It is not consistent with national policy as the methodology for undertaking the Landscape Study (which has been used to inform the spatial strategy) refers to ‘AONB and AONB Buffer Zones’ as a way of identifying higher value landscapes. There are a number of reasons why this approach is unsound but there is no Government policy support for the concept of ‘AONB buffers’ in Planning Policy Statement No.7 or any other policy guidance.
Details of Reasons for Soundess/ Legal Complaince:

3.2 Suitable Alternative Natural Green Space 3.2.1 This section of our representations refers to policy WCS7 and supporting paragraph 3.32. It is summarised below: Section of Core Strategy: Policy WCS7 Effective Provision of Infrastructure and para 3.32Legally Compliant: -Sound: NoJustified: -Effective: NoConsistent with national policy: -

3.2.2 We contend that the Council has not demonstrated that there is a reasonable prospect of delivery of Suitable Alternative Natural Green Space (SANGS) on time to mitigate impacts from development on the Ashdown Forest Special Protection Area (SPA) which means that the quantum of housing identified in the Core Strategy can not be delivered. 3.2.3 Para 3.32 of the submission Core Strategy states that for developments within seven km of the Ashdown Forest, there will be a requirement for SANGS to be provided. This has a particular impact on the deliverability of homes in Uckfield and Crowborough. 3.2.4 The housing trajectory set out in Figure 5 of the submission Core Strategy shows homes being delivered in Uckfield from 2016/17 onwards, and in Crowborough from 2015/16 onwards. 3.2.5 In respect of Crowborough, this is just five years away (from the time of submitting these responses). Para 6.34 of the submission Core Strategy notes that for land to come forward for development in Crowborough SANGS will be required. However, no land for SANGS has been identified. 3.2.6 According to the Wealden Local Development Scheme (LDS) 2009-2013 (March 2010), the Councils Strategic Sites DPD is not due to be adopted until the end of 2012, with a Delivery and Site Allocations DPD following for adoption at the end of 2013. The LDS notes that public consultation on the Site Allocations document will be undertaken in January / February 2011. This did not take place. There is no publically available timeframe to establish when this consultation will now take place. The programme for delivery has slipped and it is unclear when these documents will be adopted. The end of 2014 may be a more realistic date now for the Delivery and Site Allocations DPD. 3.2.7 We would expect one of the DPDs to identify development sites and land for SANGS. The timing here is critical: if land for SANGS is not identified until 2014 this does not allow sufficient time for this to be incorporated within planning applications and proposals for new homes in Crowborough, and for these to be determined in enough time to allow for the first units to be delivered in the phasing period 2015/16. 3.2.8 The Core Strategy Infrastructure Delivery Plan (Background Paper 11) explicitly identifies the issue of SANGS as critical to supporting growth. It states (see Table 1): ‘Development within and around Crowborough is constrained by proximity to the Ashdown Forest and Special Protection Area / Special Area of Conservation’. ‘A number of avoidance and mitigation measures required, including visitor management and the provision of a local SANG in Crowborough’.

Details of Changes to be Made:
SUMMARY 3.2.9 We thus contend that the housing trajectory is unsound because it is not effective as the Council has not demonstrated that quantum of growth identified in Crowborough can be delivered.
Representation ID

11

Person ID  Mr  Childs  Agent ID
507073

Paragraph  3.33

Sound  ☑ Yes  ☐ No  ☐ Justified  ☑ Effective  ☐ Consistent with national policy

Legally Compliant  ☑ Yes  ☐ No

Details of Reasons for Soundness/ Legal Complaince:

There is no mention in this section about the environmental impact of the traffic levels along the A259 through the South Downs National Park. The section of the A259 passes through the south Wealden area. For example: noise pollution; exhaust emissions; increasing amounts of litter and debris; increased congestion and accidents.

Details of Changes to be Made:

The general wording of the document, and the way the information was given to me, makes me unsure of how I should comment about an issue that could be relevant but is not mentioned. The only evidence that I can provide is empirical. My home is in the South Down National Park next to the A259 and I travel daily along the road by motorcar, bicycle or on foot. Moreover, for a number of years, I have collected information written by the local authority and newspapers about traffic issues related to the A259 through the National Park.

Representation ID

508

Person ID  Ashdown  Agent ID
522134  Natural England

Paragraph  3.33

Sound  ☑ Yes  ☐ No  ☐ Justified  ☑ Effective  ☐ Consistent with national policy

Legally Compliant  ☐ Yes  ☐ No

Details of Reasons for Soundess/ Legal Complaince:

We feel that the proposed avoidance and mitigation measures of SANGS and contributions for onsite access management will ensure that housing within 7km will not have a likely significant impact on Ashdown Forest.

Details of Changes to be Made:
7 Landscape 7.1 Introduction 7.1.1 In this section of the report we present our representations in regard to landscape matters in and informing the Core Strategy. Our representation is made in regard to paragraphs 3.30 – 3.33 of the submission Core Strategy, Policies WC4 and WC13 and supporting background papers. 7.1.2 For the purposes of this representation we have reviewed the ‘Landscape Character Assessment and Development Option Evaluation Study’ undertaken for the district (referred hereinafter as the ‘Landscape Study’), which is included as a background paper to the Core Strategy on the Councils website. However, it is not clear how the Landscape Study has been used to inform the spatial strategy as it is not specifically referred to in the text of Core Strategy nor is the Landscape Study listed as a background paper at paragraph 1.7 of the Core Strategy (although it is included as a background paper on the Councils website). 7.1.3 We have reviewed the methodology set out in the document and we have also reviewed whether the methodology has been consistently applied resulting in a final report that is robust, thorough and transparent and one that would form a credible evidence base suitable to inform the spatial strategy contained in the Core Strategy. 7.1.4 We contend that the Landscape Study is flawed and therefore the assessment of housing sites in the district, the spatial strategy and the Councils Sustainability Appraisal, and thus the Core Strategy, is unsound. 7.1.5 Our representation is summarised below: Section of Core Strategy: Spatial Planning Objectives 1, 3 and 11, Paras 3.30 - 3.33, Policy WCS4 Strategic Development Areas, Figure 6 Uckfield Area Strategy, Paras 6.9 and 6.11, Policy WSC13 Green Infrastructure, Paras 7.23 - 7.28Legally Compliant: -Sound: NoJustified: NoEffective: -Consistent with national policy: No Proposed Submission Core Strategy Paragraphs 3.30 – 3.33 7.1.6 Paragraph 3.30 of the Proposed Submission Core Strategy refers to Wealden’s environmental attributes and that they have an important part to play in the development of the spatial strategy and ‘had a significant impact upon the assessment of the suitability of housing land in relation to the SLHAA’. 7.1.7 Paragraph 3.30 goes on to state that: “...and sites have been carefully scrutinised with regards to landscape impact.” 7.1.8 Paragraph 3.33 refers to Government guidance and the level of protection this provides for the environment, particularly nationally and internationally designated sites, which are not duplicated in the Core Strategy. The paragraph goes on to state: “However, our strategy has been guided by high levels of protection on local and national levels, and more detailed policies are contained within the Core Strategy and further ones in subsequent DPDs.” 7.1.9 Paragraph 1.7 in the Introduction to the Core Strategy refers to a number of specialist studies that have been produced to provide a robust evidence base to inform the Local Development Framework. The Landscape Study is not listed as a background paper at paragraph 1.7 of the Core Strategy (although it is included as a background paper on the Councils website). Policy WCS4 Strategic Development Areas and Paragraphs 6.9 and 6.11 7.1.10 The Core Strategy proposes that the land to the west of Uckfield be identified as a ‘strategic development area’ suitable for accommodating 1,000 homes and some 12,650 sq metres net of employment floor space and education provision as an extension to the urban area to the west of New Town. Paragraph 6.9 refers to the SLHAA and assessment of the potential sites at the fringes of the urban area. 7.1.11 In the light of the comments that follow in this section of our representations on the Landscape Study, it considered that this proposal be reassessed and, taking into account other representations made on other parts and policies contained in the Core Strategy, greater emphasis should be given to the suitability of land at Maresfield to accommodate increased housing numbers and a larger proportion of the housing requirements for the district. Policy WSC13 Green Infrastructure, Paragraphs 7.23 - 7.28 and Background Paper BP6 7.1.12 Policy WSC13 and paragraph 7.23 to 7.28 relating to Green Infrastructure is supported although it is considered that the anomalies and errors in the Landscape Study be addressed before this document is used to inform and guide the implementation of Green Infrastructure Strategy and also formulation of the specific measures for the protection and enhancement of the landscape which are to set out in the Delivery and Site Allocations DPD referred to at paragraph 7.28 of the Core Strategy. 7.1.13 It is not clear from reading the Core Strategy, how the Landscape Study has been used to inform the above policies. 7.2 Consideration of the Methodology employed in the Landscape Study 7.2.1 Wealden Council commissioned the Landscape Study from the Landscape Group at East Sussex County Council, in September 2007. It was published in February 2009. The purpose of the Study is to: 1. Inform the preparation of WDC Local Development Framework Core Strategy and; 2. Inform the development policies on landscape management and protection. 7.2.2 The Landscape Study states that it will: 1. Assess the existing landscape character of key search areas 2. Assess the quality and value of the existing landscape in these key search areas 3. Assess the sensitivity if the existing landscape and its capacity to accept change or having regard to the scope for mitigation 4. Make recommendations on preferred locations from a landscape perspective. 7.2.3 The Landscape Study purports to use a number of methodologies for the assessment and
identifies these as being: 1. For Landscape Character/ Quality and Value - Design Manual for Roads and Bridges Vol 11, section 3, Part 5 (DT) which has been further refined by the Landscape Character Assessment Guidance for England and Scotland (CA/SNH 2002) and: 2. For landscape sensitivity – Landscape Character Assessment Guidance for England and Scotland, Topic Paper No.6: Techniques and criteria for Judging Capacity and Sensitivity (CA 2002). 7.2.4 The Landscape Study sets out, in section 2.0, the methodology and criteria used for each aspect of the landscape being assessed, including the following: 1. Landscape Quality (this should be ‘condition’ if following latest LCA guidance as the term quality is now a discredited approach to assessing landscapes) 2. Landscape Value 3. Landscape Sensitivity 4. Visual Sensitivity 5. Landscape Capacity 7.2.5 In relation to the assessment of landscape capacity, capacity is defined in Topic Paper No.6: ‘Techniques and Criteria for Judging Capacity and Sensitivity’ as: ‘The degree to which a particular landscape type or area is able to accommodate change without significant effect on its character, or overall change of landscape character type. Capacity is likely to vary according to the type and nature of change being proposed’. 7.2.6 We have reviewed the Landscape Study, in particular, the methodology set out in the document and whether this has been consistently applied to form a credible evidence base suitable to inform the spatial strategy contained in the Core Strategy.

7.2.7 The review of the Core Strategy background paper indicates that the Landscape Study has not followed the guidance in Topic Paper No.6. Topic Paper No.6 suggests that there are two approaches to assessing landscape sensitivity. These are: 1. Judging Overall Landscape Sensitivity and; 2. Judging Landscape Sensitivity to a specific type of change. 7.2.8 However, in order to assess landscape capacity, the assessment of the sensitivity of different types or areas of landscape to the type of change in question must be combined with an assessment of the more subjective or perceptual aspects of the landscape and of the value attached to the landscape. 7.2.9 The stages for assessing landscape capacity of a landscape are set out in Section 3.0 of Topic Paper No.6 and reproduced in Figure 7.1 below. Figure 7.1: Stages for assessing landscape capacity Source: Landscape Character Assessment Guidance for England and Scotland, Topic Paper No.6: Techniques and criteria for Judging Capacity and Sensitivity (CA 2002) 7.2.10 Sections 5.0 and 6.0 of Topic Paper No.6 provide the more detailed considerations that need to be taken into account. 7.2.11 The boxed text, at paragraph 2.11.2 of the Landscape Study, follows the same assessment stages used to assess the landscape capacity to accommodate a specific type of change and given the local scale of the assessment work it is considered that this is the appropriate method to use. 7.2.12 However, Topic Paper No.6, at paragraph 6.5, also goes on to state that: ‘Capacity is all a question of the interaction between the sensitivity of the landscape, the type and amount of change and the way that the landscape is valued’. 7.2.13 Sections 2.11 and 2.12 of the Landscape Study set out the approach used by East Sussex County Council landscape group in undertaking the landscape study. However, the assessment does not define the quantum of housing development used to assess the capacity of each character area, nor is the LDF Core Issues and Options Consultation Paper July 2007 referred to as a guide to the quantum of housing development used to assess each of the different character areas. The Landscape Study does however state at paragraph 2.12.3 that: ‘an overall assessment can be made for each character area on the capacity to accept the type of change being considered. This judgement is made according to the combination of characteristics that contribute to a particular area of landscape. The capacity of an area to accept change is related to the potential of the area to accommodate development in a particular location without detracting from the overall character of that landscape. The capacity evaluation of each character area does not assume that this is the capacity across the entire character area’. 7.2.14 There are a number interrelated issues raised in the above paragraph which we now turn to. 7.2.15 In relation to the type of change, the Landscape Study defines, at paragraph 2.12.6, the assumptions used for the assessment business uses, i.e. the assessment of sensitivity / capacity is based on light industrial type uses which would be consistent with a residential environment and these would be single storey units. However the Landscape Study does not define the full details of the housing use, such as type (housing - single storey / two storey / three storey etc) or amount (large / medium / small scale development) and we contend that the details of the change being considered is not transparent from the Landscape Study, as although the type of change (i.e. housing) is known, the form and amount of housing is unknown. These are important factors when considering the landscape capacity of an area to accommodate development, especially if using the stages set in the Landscape Study. 7.2.16 A similar assumption to the business use (or range of assumptions) could have been used for assessing the impact on landscape sensitivity / capacity of each character area. For example two to three storey houses at the following ranges: 1. small scale housing between five to 50 dwellings, 2. medium scale housing development between 50 to 200 dwellings, and 3. large scale housing development between 200 to 500 dwellings. 7.2.17 In relation to the combination of the characteristics that contribute to a particular area, comments on these are made in later sections (See paragraphs 7.4.1 to 7.4.14 below). 7.2.18 The Landscape Study also refers to mitigation and management of the landscape (Section 2.13) and, in paragraph 2.13.1, it highlights that mitigation has been used to determine the visual and character sensitivity of the landscape. This approach does not accord with Topic Paper No.6 as mitigation should only be used to inform the visual sensitivity of the area assessed, (See Figure 7.1 above), and not directly the character sensitivity of an area (although visual aspects are one of the aspects that inform the character of an area). Mitigation in itself can have a significant effect on character and the landscapes capacity to accommodate development. In some cases mitigation would make an area less suitable to accommodate development not more suitable. Again this, we would contend, is a flaw in the assessment. The existing management of the landscape is relevant to determining the condition (or quality) of an area of landscape but the identification of management opportunities is not relevant to determining the capacity of the landscape to
accommodate development. Management of the land could in itself bring about a change to the landscape which is discordant with its character, for instance managing the land to encourage woodland growth or planting extensive woodlands in a very open exposed landscape would lead to a significant change. 7.2.19 The methodology section of the Landscape Study also includes a part dealing with the Areas of Outstanding Natural Beauty (AONB) within the district. Section 2.14 refers to ‘AONBs and AONB Buffer Zones’ as a way of identifying higher value landscapes within Wealden. At paragraph 2.14.2 the Landscape Study states: ‘There is, in some areas adjacent to the AONB boundary a buffer zone to the AONB landscape. This is usually an area of similar character but not of the same quality as the AONB landscape and not covered by the same planning policy. Where relevant these areas are indicated in the figures’. 7.2.20 Paragraph 2.14.4, the Landscape Study goes on the state the following: ‘These buffer zones have been identified through the character area analysis. The relative sensitivity of these areas has been considered according to the landscape character to achieve a balanced comparison with AONB and AONB landscapes’. 7.2.21 The Landscape Study considers that there is support for this ‘buffer zone’ approach due to Policy EN2 (f) of the East Sussex and Brighton and Hove Structure Plan. We contend that this approach is flawed and unsound. Firstly, the Structure Plan has been superseded by the South East Plan and at the time of preparing the Landscape Study during the period August 2007 to February 2009, both East Sussex County Council and Wealden District Council would have been aware of the emerging South East Plan policies through the draft regional plan. Secondly, Policy EN2 (f) does not prohibit development but seeks to protect the Sussex Downs and High Weald AONBs and minimise the impact of development within them by requiring measures to integrate the development in to the landscape. Thirdly, there is no Government policy support for the concept of ‘AONB buffers’ in Planning Policy Statement No.7. Like Policy EN2 of the Structure Plan, PPS 7 does not prohibit development within the boundaries or adjoining an AONB but merely seeks to ensure that the landscapes within AONBs are considered carefully and appropriate measures taken to mitigate the harm that potential development may cause. 7.2.22 The fourth point is that, whilst the Council would seek support from Policy EN2 (f) as a way of ‘balancing the comparison between AONB and non AONB areas’ especially the areas of landscape close to the AONB boundary, the East Sussex and Brighton and Hove Structure Plan does not define the extent of the buffer zone on the Key Diagram nor is the extent of the buffer area set out in its explanatory text. We contend that the justification for this approach must be given very little weight. 7.2.23 Lastly, it is acknowledged that some areas of landscape within an AONB may be of poorer condition (quality) score and / or lower visual and character sensitivity than areas outside of the AONB but the adjustment in the landscape sensitivity / capacity scoring by introducing what appears to be an arbitrary AONB buffer zone seems to undermine the purposes and status of the AONB designation,(and its planning policy protection), by attaching increased value to a character area that adjoins the AONB which although it may be of a similar character, does not meet the quality criteria for inclusion within the AONB. In addition, it is noted that the Landscape Study has not been subject to peer review and there is no evidence that it has had stakeholder input / consultation with statutory consultees, such Natural England / High Weald AONB Joint Advisory Committee and other interested bodies to agree this approach to the AONBs. 7.2.24 The Study goes on to set out the method used to undertake a comparative evaluation of a potential development area within a character area which has capacity to accommodate development. This gives an early indication of sites which would be worthy of further consideration for development in landscape terms. We contend that the comparative assessment of character areas within the District is flawed as the starting point for the assessment the landscape sensitivity / capacity analysis is unsound for the reason given above. 7.2.25 Notwithstanding the above point, Section 2.15.4 of the Landscape Study states that: ‘Prior to coming to a firm view on the full potential and scope in these areas further investigation would be required’. 7.2.26 However, the Study does not present evidence of this further investigation or how preferred development areas have been chosen; for example there is no detailed assessment of the west of Uckfield area although this has been identified as a major urban extension area under Policy WCS4 - SD1. 7.3 Critical Review of the findings of the Landscape Study 7.3.1 The Landscape Study methodology sets out how each landscape character is to be assessed and the information recorded using landscape character assessment sheets (section 2.5) whilst section 2.17 of the Landscape Study refers to mapping which is split into two stages. Stage 1 relates to recording baseline information on each character area such as planning designation, Public Right of Way and key viewpoint, focal point, landscape features and detractors (which should be read with the assessment record sheets). Stage 2 relates to the identification of potential development areas with indicative boundaries and also identifies key woods, shaws, hedges, tree belts etc and also the potential for mitigation planting. 7.3.2 In order to assess the robustness of the landscape capacity study for the purpose of this representation, the area around Uckfield, Maresfield and Five Ash Down were visited and the baseline information recorded on the landscape assessment sheets checked and the judgements reached reviewed. This check revealed that that were a number of elements / features not recorded or identified for some areas and therefore these factors were not able to inform the judgement reached. 7.3.3 For example, ‘Maresfield Area A’, is described as: ‘An open, undulating landscape used for pasture to the west and pleasure to the east. It is ungrazed showing some scrub. Wide long views to the south. Surrounded on other sides by mature trees and exotic Eucalyptus and Cedars from nearby Park. Fine houses on outskirts and within site. Fine clumps of Pines. Some road noise adjoins picturesque recreation ground’. 7.3.4 The assessment sheet omits a number of important features such as areas of woodlands and plantations, (some of which are ancient woodlands and provide screening, containment and form visual barriers). Hedges, fences, footpaths and reference to the bypass were not recorded. The assessment sheet also refers to parkland and that the majority of the land is amenity land lacking management. A wide long view(s) out to
the south is highlighted as a key feature which is correct when looking south from a small part of the area but elsewhere views are contained and obscured by landform and vegetation. The record sheet includes a photograph of the view south but this is not taken from the recreation ground as recorded on the map Figure 52. The photograph was taken from private land on the footpath. 7.3.5 In the visual appraisal section of the assessment sheet it records the local receptors as amenity land and houses, types of view as long views from top of ridge to the south and visual barriers as landform / trees and hedges. It concludes that the sensitivity is high (see table 7.1 below). It is acknowledged that there are views within the area but these tend to be short partial or glimpsed views with long views out towards the south from high ground in the north eastern parts of character area. Views into the area are very limited and development within the area would have a minimal impact on views. However, in views from the ridge to the south the recreation occupying the north eastern parts of the character area is seen whilst the remaining areas are hidden from view and therefore the visual sensitivity of the majority of the area is low. 7.3.6 The resultant evaluation of this area was considered as follows: Table 7.1: Landscape Study Assessment, Maresfield Area A Character Area Maresfield A Quality Good Value Medium Sensitivity to Change Moderate Visual Sensitivity High Management Opportunities Mange hedges and grazing. Mange recreational spaces and access to countryside. Need to retain gap between Maresfield and Uckfield. Potential for Mitigation LowPlanting would change open character and obscure long views out from recreation ground Capacity to Accept Change: Housing LowClose to village edge only Capacity to Accept Change: Business Low 7.3.7 We contend that the record sheets are incorrect and the judgement on quality / condition is erroneous and should be ‘ordinary’ as most of the land is unmanaged comprising rank grassland of little intrinsic landscape value and the visual sensitivity of the area is ‘moderate or low’ due to the strong enclosure afforded to the area. It is interesting to note that one of the management opportunities is to retain a gap between Maresfield and Uckfield although there is no planning policy support for the retention of gaps in the Core Strategy or previous Non Statutory Wealden Local Plan. 7.3.8 By comparison, another example is Character Area L – land to the west of Uckfield, which is described as: ‘Land sloping away from urban edge to Uck valley and A26 Uckfield by pass. Strong field structure with arable and pasture. Some large fields. Sewage works detractors. Few focuses of character. Development would need a well defined edge to prevent creep’. 7.3.9 The assessment sheet for this character area has recorded the land cover and landscape elements correctly but has not recorded any landform features and relatively few aesthetic factors, although it describes the land as sloping away from the urban edge with a strong field structure with arable and pasture. The landscape condition is considered to be fair which is not defined in the methodology although this changes to ordinary in the comparison table. 7.3.10 In the visual appraisal section of the assessment sheet it records the local receptors as countryside on the other side of Uck Valley, isolated properties, footpaths and A26 and houses on the urban edge, types of view as views across to woods at West Park / Butchers Wood, wooded ridge of Shortbridge across Uckfield Valley and visual barriers as few. It concludes that the sensitivity is ‘moderate’ (see table 7.2). Table 7.2: Landscape Study Assessment, Uckfield Area L Character Area Uckfield L Quality Ordinary Value MediumSnawAccessible for recreation Sensitivity to Change Moderate Visual Sensitivity Moderate High on ridge Management Opportunities Mange hedges and grazing. Farm diversification pressure. Manage wood and existing trees and hedges Potential for Mitigation ModerateLow on ridge as need to retain open fieldsSoftens urban edge. Create green network. Relocate recreation ground Capacity to Accept Change: Housing ModerateNeed well defined boundaries close to urban edge avoid high ground Capacity to Accept Change: Business No capacity 7.3.11 We contend that the record sheets are incorrect and the judgement on quality / condition is under estimated and should be ‘good’ as most of the land is attractive farmed landscape with some distinctiveness features with a recognisable landscape structure. The assessment sheet ignores the open exposed nature of this character area, with long views south and west and numerous views in to the area from the surrounding countryside (roads and footpaths), and therefore the visual sensitivity of the area should be ‘high’ due the number of viewpoints where views can be obtained. This can be compared to the Maresfield A area which is considered to have ‘high’ sensitivity rating but with a few vantage points available where development impacts will be perceived. 7.3.12 We also note that under management opportunities it is considered that the area could contribute to managing the urban fringe, which could equally apply to the land to Maresfield, and that under the potential for mitigation heading is considered that the area has a ‘moderate’ ability, although the introduction of mitigate planting as shown Figure 11 of the landscape Study would dramatically and significantly change the landscape character of the area. 7.3.13 These examples illustrate the inconsistency of the landscape assessment record sheet and the arbitrary nature of the judgements made. It does not give any confidence to the manner in which the Landscape Study has been undertaken or to the transparent way that the judgements have been reached. 7.4 Implications for the soundness of the Core Strategy 7.4.1 We have reviewed the ‘Landscape Character Assessment and Development Option Evaluation Study’ of the district. It is not clear how this Landscape Study has been used to inform the spatial strategy as it is not specifically referred to in the Core Strategy, nor is the Landscape Study listed as a background paper at paragraph 1.7 of the Core Strategy (although it is included as a background paper on the Councils website). 7.4.2 We have reviewed the methodology set out in the document and we have also reviewed whether the methodology has been consistently applied resulting in a final report that is robust, thorough, and transparent and that it would form a credible evidence base suitable to inform the spatial strategy contained in the Core Strategy. The Study also includes a methodology employed to undertake a comparative evaluation of a potential development area within a character area which has capacity to accommodate development. 7.4.3 The examples referred to in our analysis above illustrate the inconsistency of the landscape assessment record sheets and arbitrary nature of the judgements made and it does not give any confidence to the manner in which the
Landscape Study has been undertaken or to the transparent way that the judgements have been reached. 7.4.4 We contend that the Landscape Study is flawed and therefore the assessment of housing sites in the district, the spatial strategy and the Councils Sustainability Appraisal is unsound. In addition, in relation to the comparison assessment of sites within the district surrounding the towns and villages; we contend that this comparative assessment of character areas is flawed as the starting point for the assessment the landscape sensitivity/capacity analysis is unsound for the reason given above. 7.4.5 The Core Strategy proposes that the land to the west of Uckfield be identified as a ‘strategic development area’ suitable for accommodating 1,000 homes and some 12,650 sq metres net of employment floor space and education provision as an extension to the urban area to the west of New Town. In the light of the comments made on the Landscape Study, it is considered that this proposal be reassessed and, (taking into account the other representations made on other parts and policies contained in the Core Strategy), greater emphasis be given to the suitability of land at Maresfield to accommodate increased housing numbers and a larger proportion of the housing requirements for the district. 7.4.6 Policy WSC13 relating to Green Infrastructure is supported although it is considered that the anomalies and errors in the Landscape Study be addressed before this document is used to inform and guide the implementation of Green Infrastructure Strategy and also formulation of the specific measures for the protection and enhancement of the landscape which are to set out in the Delivery and Site Allocations DPD referred to at paragraph 7.28 of the Core Strategy.

Details of Changes to be Made:

SUMMARY 7.4.7 In conclusion, we contend that the Core Strategy is unsound because: 1. It is not justified as it is not based on a sound evidence base as the Landscape Study (Landscape Character Assessment and Development Options Evaluation Study of the District) is flawed and therefore the assessment of housing sites in the district, the spatial strategy and the Councils Sustainability Appraisal is unsound. It is not clear how the Landscape Study has been used to inform the spatial strategy as it is not specifically referred to in the Core Strategy nor is the Landscape Study listed as a background paper at paragraph 1.7 of the Core Strategy; 2. It is not justified because the Landscape Study as it is not robust, thorough, and transparent and that it does not form a credible evidence base suitable to inform the spatial strategy contained in the Core Strategy. The Landscape Study contains a number inconsistencies set out in the landscape assessment record sheets and contains a number of arbitrary judgements and so it does not give any confidence to the manner in which the Landscape Study has been undertaken or to the transparent way that the judgements have been reached 3. It is not consistent with national policy as the methodology for undertaking the Landscape Study (which has been used to inform the spatial strategy) refers to ‘AONB and AONB Buffer Zones’ as a way of identifying higher value landscapes. There are a number of reasons why this approach is unsound but there is no Government policy support for the concept of ‘AONB buffers’ in Planning Policy Statement No.7 or any other policy guidance.
Details of Reasons for Soundess/ Legal Complaince:
I am entirely unsure as to whether a council invested with planning authority is required to have a 'VISION' and therefore whether a Planning Inspector is required to tick a box or comment on this particular vision.

Details of Changes to be Made:
Is WDC's vision the same as the Mission Statements that businesses use to find it necessary to produce? The general view held at the time was that any business needing to produce such a mission statement was in serious trouble! What is my vision:-. I see my new Unitary Council decoupling the provision of council housing, sorry - of course I mean affordable housing, from the planning process for new builds. I see my new council offering it's electorate the choice of how or if Affordable Housing is to be provided and who pays. I see my council administering the Low Weald and the enclosed major towns such as Hailsham, Polegate Eastbourne, Bexhill and Hastings. I see it honest and brave enough to offer it's electorate the choice of continued expansion via huge green field sites or containment within the quite well defined existing boundaries of it's settlements and towns.. I see my council honest enough to recognise the limits of it's influence in the anarchic new world order initiated by New Labour and further fractured by the CONdems. It follows therefore that my Planning Authority will be a light weight and low cost operation without the need for external consultants for this and that.. Without the prospect of major financial gains from huge building sites, after an initial battle or two ( handled by class actions at a national level), it will be free to make decisions undeterred by legal threats from Outline Planning Permission traders. My vision for my local planning authority is that it will be free to concentrate on the basics: ensuring that building work conforms to legal and professional standards and ensuring a balance is struck between individual aspiration and local acceptability.
Representation ID
1136
Person ID  Ms Harrison
Agent ID  Southern Water
Agent ID  Box 1
Sound  ☑ Yes  ☑ No  ☑ Justified  ☑ Effective  ☑ Consistent with national policy
Legally Compliant  ☑ Yes  ☑ No

Details of Reasons for Soundess/ Legal Complaince:
Southern Water owns and manages Bewl Reservoir – a strategic water resource. The reservoir lies partially within Wealden District and serves large parts of Kent and East Sussex in addition to Wealden District. This water resource is used by both Southern Water and South East Water which supplies water to Wealden District. As foreshadowed in Wealden’s Core Strategy Spatial Development Options document, enlarging Bewl Reservoir is one of the strategic options which may need to be implemented within the planning horizon of Wealden’s Core Strategy; therefore it is vital that this option is recognised in said strategy. The need for this resource is evidenced by: o Southern Water’s Water Resources Management Plan o South East Water’s Water Resources Management Plan o Modelling work carried out by the Water Resources for the South East Group o Policy NRM3 of the South East Plan Wealden’s Core Strategy is: o Not justified as it does not rely on the evidence base available. Instead, it appears to disregard evidence provided concerning the potential need to enlarge Bewl reservoir. o Not effective due to the lack of recognition of the potential need and mechanism for supporting the enlargement of Bewl reservoir. o Not consistent with national policy as it does not look beyond its own boundaries as required in PPS 12

Details of Changes to be Made:
Please set out what change(s) you consider necessary to make the Core Strategy legally compliant or sound. Southern Water has previously submitted representations seeking the inclusion of a reference to safeguarding land for the raising of Bewl water in the Core Strategy. Furthermore, Wealden foreshadowed its inclusion in its Core Strategy Spatial Development Options document which was published and put out to consultation in the summer of 2009 Southern Water considers that the Wealden District’s Core Strategy should clearly state the planning authority’s intention to safeguard appropriate land for the enlargement of Bewl reservoir. A subsequent Site Allocations DPD could then identify the site specific requirements associated with any future enlargement of the reservoir, including the land to which the policy relates. We propose the addition of the following paragraph to the core strategy: In accordance with the evidence set out in: o Southern Water’s Water Resources Management Plan o South East Water’s Water Resources Management Plan o Modelling work carried out by the Water Resources for the South East Group o Policy NRM3 of the South East Plan Wealden District Council will safeguard the land necessary for the potential need to expand Bewl reservoir in the future in the site allocations DPD.

Representation ID
1642
Person ID  Rydon Homes Ltd
Agent ID  Mr. Hough
Agent ID  Box 1
Sound  ☑ Yes  ☑ No  ☑ Justified  ☑ Effective  ☑ Consistent with national policy
Legally Compliant  ☑ Yes  ☑ No

Details of Reasons for Soundess/ Legal Complaince:
The CS policies are evidently not aiming to meet future housing needs based on Government projections and the local needs evidence. Similarly it is evidently not proposed to secure regeneration and economic growth at Crowborough. Policy SP03 only aims to “help address the need for houses”. If the vision is not intended to meet all of Wealden’s housing needs, then it should say so.

Details of Changes to be Made:
Revise the wording of the vision to confirm the intention that housing need should not be met in full or revise the policies to ensure that there is a prospect of the vision being achieved. In either case fundamental re-consultation is required.
Details of Reasons for Soundess/ Legal Complaince:
The vision should aspire to see all villages and rural settlements have their sustainability enhanced. In this Section we comment on the Vision and Spatial Planning objectives which the Council has set out in Section 4 of the Consultation document. The final part of the stated Vision is that by 2030 in Wealden "a number of its villages and rural settlements will have enhanced their sustainability through successful growth including provision of affordable housing." Whilst that may be a realistic view of the outcome, the Vision should be aspirational. Consistent with national policy, the Council should be seeking to ensure that all of its villages and rural settlements will have enhanced their sustainability. Accordingly we propose that "a number of" is deleted from line 6 of the Vision.

Details of Changes to be Made:
Specifically, we object to SP03 and the proposed level of housing provision for the reasons stated in Section Five Delete "a number of" in line 6.

Details of Reasons for Soundess/ Legal Complaince:
Natural England commends the Council on its recognition of the importance of the environment and green infrastructure and the need to provide resilience for climate change. We particularly support spatial planning objectives SP01, SP07 SP09 and SP011

Details of Changes to be Made:
We generally support all 15 of the Spatial objectives but SPO1 (countryside and rural areas) should make specific mention of the downs.
Vision and Spatial Planning Objectives - Support 2.1 We support the WDC’s Spatial Planning Objectives (SPO1 – SP15). We consider the Objectives promote sustainable growth and strike an appropriate balance to accommodate that growth given the environmental and infrastructure requirements of the District. The Objectives will support Wealden’s aspiration to retain its rural character and high quality environment whilst achieving sufficient growth to support its economy, regenerate market towns and tackle deprivation. 2.2 To meet the ‘justified’ test of soundness, “the most appropriate strategy when considered against reasonable alternatives” needs to be explored. PPS12 expands on this further: ‘the ability to demonstrate that the plan is the most appropriate when considered against reasonable alternatives delivers confidence in the strategy. It requires the local planning authority to seek out and evaluate reasonable alternatives promoted by themselves and others to ensure that they bring forward those alternatives which they consider the LPA should evaluate as part of the plan making process. There is no point in inventing alternatives if they are not realistic. Being able to demonstrate that the plan is the most appropriate having gone through an objective process of assessing alternatives will pay dividends in terms of easier passage for the plan through the examination process. It will assist in evaluating the claims of those who wish to oppose the strategy.’ (PPS12, para 4.38 – PPS12’s own emphasis shown in italics)

2.3 In order to provide for a suitable strategy that strikes the right balance, WDC has prepared an extensive Evidence Base which identifies and assesses the various options available to WDC. These options are reviewed within the Background Papers (BP), in particular, BP1: Development of the Proposed Submission Core Strategy (section 5) and BP10: Sustainability Appraisal of Proposed Submission Core Strategy (Table 1.2). The Background Papers demonstrate the ‘appropriateness’ of the current proposed strategy, that ‘reasonable alternatives’ have been tested and that the Spatial Planning Objectives are found on ‘robust evidence’ i.e. the visions are ‘justified’ as required by PPS12. 2.4 The previous Spatial Development Options (June 2009) Consultation tested up to six different housing scenarios to accommodate the South East Plan (May 2009) housing target. In the light of the revocation of the RSS paragraphs 5.9 and 5.10 of BP1: Development of the Proposed Submission Core Strategy set out the steps which were addressed in determining the overall revised quantum of growth and the suitability of the proposed locations to accommodate this growth: ‘The Local Strategic Partnership focused upon meeting housing needs across the District, whilst Parish and Town Council’s within Wealden provided information on local growth issues and preferences’. This is further explored in paragraphs 5.11 – 5.37 and Section 7 of BP1: Development of the Proposed Submission Core Strategy including an assessment of the settlement hierarchy. 2.5 Section 8 of BP1: Development of the Proposed Submission Core Strategy is supported by section 8 of BP10: Sustainability Appraisal of Proposed Submission Core Strategy which in turn supports the Spatial Planning Objectives within the Core Strategy. The Options tested are considered realistic and are not ‘artificial’ as set out in paragraph 38 of PINS ‘Learning From Experience’ (Sept 2009) document, which states, ‘in some instances it appears that options are identified for the sake of having options rather than because they are realistic….if the options are limited there is no point in trying to artificially create them’. 2.6 The Spatial Planning Objectives therefore provide a clear vision and are specific to the challenges of the District. They are supported by the Evidence Base which has a clear audit trail, has tested all the reasonable alternatives and is therefore ‘justified’. Furthermore, the Objectives are consistent with National Policy including ‘emerging’ National Guidance contained in the Localism Bill (i.e. the level of housing has been determined by a locally derived need).

Details of Changes to be Made:
Vision and Spatial Planning Objectives - Support 2.1 We support the WDC’s Spatial Planning Objectives (SPO1 – SP15). We consider the Objectives promote sustainable growth and strike an appropriate balance to accommodate that growth given the environmental and infrastructure requirements of the District. The Objectives will support Wealden’s aspiration to retain its rural character and high quality environment whilst achieving sufficient growth to support its economy, regenerate market towns and tackle deprivation. 2.2 To meet the ‘justified’ test of soundness, “the most appropriate strategy when considered against reasonable alternatives” needs to be explored. PPS12 expands on this further: ‘the ability to demonstrate that the plan is the most appropriate when considered against reasonable alternatives delivers confidence in the strategy. It requires the local planning authority to seek out and evaluate reasonable alternatives promoted by themselves and others to ensure that they bring forward those alternatives which they consider the LPA should evaluate as part of the plan making process. There is no point in inventing alternatives if they are not realistic. Being able to demonstrate that the plan is the most appropriate having gone through an objective process of assessing alternatives will pay
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dividends in terms of easier passage for the plan through the examination process. It will assist in evaluating the claims of those who wish to oppose the strategy.’ (PPS12, para 4.38 – PPS12’s own emphasis shown in italics)

2.3 In order to provide for a suitable strategy that strikes the right balance, WDC has prepared an extensive Evidence Base which identifies and assesses the various options available to WDC. These options are reviewed within the Background Papers (BP), in particular, BP1: Development of the Proposed Submission Core Strategy (section 5) and BP10: Sustainability Appraisal of Proposed Submission Core Strategy (Table 1.2). The Background Papers demonstrate the ‘appropriateness’ of the current proposed strategy, that ‘reasonable alternatives’ have been tested and that the Spatial Planning Objectives are found on ‘robust evidence’ i.e. the visions are ‘justified’ as required by PPS12. 2.4 The previous Spatial Development Options (June 2009) Consultation tested up to six different housing scenarios to accommodate the South East Plan (May 2009) housing target. In the light of the revocation of the RSS paragraphs 5.9 and 5.10 of BP1: Development of the Proposed Submission Core Strategy set out the steps which were addressed in determining the overall revised quantum of growth and the suitability of the proposed locations to accommodate this growth: ‘The Local Strategic Partnership focused upon meeting housing needs across the District, whilst Parish and Town Council’s within Wealden provided information on local growth issues and preferences’. This is further explored in paragraphs 5.11 – 5.37 and Section 7 of BP1: Development of the Proposed Submission Core Strategy including an assessment of the settlement hierarchy. 2.5 Section 8 of BP1: Development of the Proposed Submission Core Strategy is supported by section 8 of BP10: Sustainability Appraisal of Proposed Submission Core Strategy which in turn supports the Spatial Planning Objectives within the Core Strategy. The Options tested are considered realistic and are not ‘artificial’ as set out in paragraph 38 of PINS ‘Learning From Experience’ (Sept 2009) document, which states, ‘in some instances it appears that options are identified for the sake of having options rather than because they are realistic….if the options are limited there is no point in trying to artificially create them’. 2.6 The Spatial Planning Objectives therefore provide a clear vision and are specific to the challenges of the District. They are supported by the Evidence Base which has a clear audit trail, has tested all the reasonable alternatives and is therefore ‘justified’. Furthermore, the Objectives are consistent with National Policy including ‘emerging’ National Guidance contained in the Localism Bill (i.e. the level of housing has been determined by a locally derived need).

Representation ID 1531
Person ID Mrs Rudin  Agent ID Box 10
105986 Forest Row Parish Council
Sound ☑ Yes ☐ No ☐ Justified ☐ Effective ☐ Consistent with national policy
Legally Compliant ☐ Yes ☐ No
Details of Reasons for Soundess/ Legal Complaince:
Support for the overarching objectives that contribute to the Vision. They are laudable and, we believe, achievable in broad terms across the district.

Details of Changes to be Made:

Representation ID 447
Person ID Mr Phillips  Agent ID Box 10
104870 Campaign for Better Transport
Sound ☐ Yes ☑ No ☐ Justified ☑ Effective ☐ Consistent with national policy
Legally Compliant ☑ Yes ☐ No
Details of Reasons for Soundess/ Legal Complaince:
Policies to restrain traffic, obtain modal shift in travel, reducing need to travel and improve the experience of non-car travel need to be sharpened and focused. Aspirations for these to happen must have necessary circumstances incorporated into the policies.

Details of Changes to be Made:
Demand management techniques for traffic in Hailsham (6.15) should be included in all the related and equivalent policies. There should be a definite commitment to traffic reduction measures and targets throughout the Strategy Plan document.
**Representation ID** 468

**Person ID** 104870  
Mr Phillips  
Campaign for Better Transport

**Agent ID** Box 10

- Sound: No  
- Legally Compliant: Yes

**Details of Reasons for Soundness/ Legal Compliance:**

'Suitable parking provision' to support retailing and other business is ambiguous. There is clear concern of traffic impact on Ashdown Forest (3.32), parking issues at Polegate station (6.25) and limited supply of brownfield development opportunity (5.8). Policies rightly aspire to cut traffic, combat climate change, avoid flood risk areas, improve safety and maximise use of previously developed land. Parking is a key element in making these effective.

**Details of Changes to be Made:**

'Suitable parking provision' should clearly avoid being 'excessive', in pursuit of these policies. A significant quantity of current parking space should be available for brownfield redevelopment. Car free developments should be encouraged and supported.

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**Representation ID** 324

**Person ID** 330894  
Mrs Pidgeon  
South East Water Ltd

**Agent ID** Box 10

- Sound: No

**Details of Reasons for Soundness/ Legal Compliance:**

See comments in respect of paragraph 2.11. It is essential that development, in taking full account (by mitigation or adaptation) of the likely forecast impacts of climate change, includes measures to minimise water use. Without this, the policy and therefore the Core Strategy will not be effective in mitigation or adapting to climate change.

**Details of Changes to be Made:**

Amend policy SP09 as follows: We will ensure development takes full account (by mitigation or adaptation) of the likely forecast impacts of climate change including: minimising the emissions of greenhouse gases; the use of non-renewable energy, natural resources and water; and by encouragement of construction using sustainable techniques.

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**Representation ID** 265

**Person ID** 134707  
Mr Hurwood  
CPRE Sussex, Wealden South Group

**Agent ID** Box 11

- Sound: No

**Details of Reasons for Soundness/ Legal Compliance:**

SPO10 should include restrictions on development in areas where it could increase the risk of flooding elsewhere.
Details of Reasons for Soundness/ Legal Complaince:
Sites which include access road over medium and high risk flooding areas should not be subject to this policy. Such sites should be confirmed as developable subject to specific Flood Risk Assessment demonstrating that this site is suitable for development.

Details of Changes to be Made:

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Details of Reasons for Soundness/ Legal Complaince:
The Core Strategy is sound and sets out a justified and effective land use strategy for the Polegate area which is consistent with national planning policy. Policy WCS4, Strategic Development Areas, lists as Location SD4 'Land at South Polegate and East Willingdon'. Chapter 6, paragraphs 6.21 to 6.32 and Figure 8 (pages 43-46) show a clear and suitable set of proposals. There is to be no development west of Polegate; housing is proposed to be located in an urban extension south of Polegate and east of Willingdon (Hindslands and Mornings Mill). Paragraph 6.27 of the Core Strategy states: A site was allocated in the 2005 Non Statutory Wealden Local Plan for an urban extension to the north west of Polegate in the vicinity of Honey Farm. However, this proposal was dependent upon the provision of the Folkington Link and other community infrastructure to enable the integration of development into the town. No such infrastructure has been provided or is known to be planned. Since this allocation for South Downs has achieved National Park status and the adjacent Wootton Manor has formally been included in the English Heritage Register of Historic Parks and Gardens. This site has been re-assessed as part of SHLAA and is no longer considered suitable for housing. Paragraph 6.27 of the Core Strategy is strongly supported. The overwhelming arguments against the Honey Farm Location have now been accepted by the District Council. These arguments are: 1. The Honey Farm location would be an isolated development cut off by the A27 trunk road - the 'Folkington Link' no longer being in the trunk road programme. 2. Foot and cycle access to the Honey Farm site would be permanently by footbridges and alleyways directly affecting residents in the Brookside Avenue area of Polegate. 3. The Honey Farm location could not be integrated into the community of Polegate and would be a separate settlement. 4. The setting of the South Downs National Park would be harmed. 5. The setting of the adjacent historic property Wootton Manor, its park and garden would be damaged. The Core Strategy is justified in rejecting the Honey Farm location. The proposed housing location at Hindslands and Mornings Mill is sound and justified.

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Details of Changes to be Made:

Yes
Sound

Yes
Legally Compliant

No

Justified
Effective
Consistent with national policy

No

Yes
Details of Reasons for Soundness/ Legal Compliance:
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Details of Reasons for Soundess/ Legal Complaince:
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Details of Changes to be Made:
Representation ID
1131
Person ID  Mr  Hayward  Agent ID
107124
Paragraph  6.29
Sound  Yes  No  Justified  Effective  Consistent with national policy  Legally Compliant Yes  No

Details of Reasons for Soundess/ Legal Complaince:
The Core Strategy is sound and sets out a justified and effective land use strategy for the Polegate area which is consistent with national planning policy. Policy WCS4, Strategic Development Areas, lists as Location SD4 ‘Land at South Polegate and East Willingdon’. Chapter 6, paragraphs 6.21 to 6.32 and Figure 8 (pages 43-46) show a clear and suitable set of proposals. There is to be no development west of Polegate; housing is proposed to be located in an urban extension south of Polegate and east of Willingdon (Hindslands and Mornings Mill). Paragraph 6.27 of the Core Strategy states: A site was allocated in the 2005 Non Statutory Wealden Local Plan for an urban extension to the north west of Polegate in the vicinity of Honey Farm. However, this proposal was dependent upon the provision of the Folkington Link and other community infrastructure to enable the integration of development into the town. No such infrastructure has been provided or is known to be planned. Since this allocation for South Downs has achieved National Park status and the adjacent Wootton Manor has formally been included in the English Heritage Register of Historic Parks and Gardens. This site has been re-assessed as part of SHLAA and is no longer considered suitable for housing. Figure 8 Shows that the land west of Polegate north of the railway line will stay as open countryside adjacent to the National Park. Paragraph 6.27 of the Core Strategy is strongly supported. The Honey Farm or West of Polegate (Pelham Homes) site was included in the Non-Statutory Local Plan in 2004 but that Plan was never subject to a public inquiry. those affected by the Honey Farm site were not permitted in 2004-2005 to oppose it by advancing a different location for the housing, as the opportunity to propose a different location was stated then to be given by the Local Development Framework process in 2005-2007. That was delayed and this stage has only now been reached with this Core Strategy. The overwhelming arguments against the Honey Farm Location have now been accepted by the District Council. these arguments are: 1. The Honey Farm location would be an isolated development cut off by the A27 trunk road - the 'Folkington Link' no longer being in the trunk road programme. 2. Foot and cycle access to the Honey Farm site would be permanently by footbridges and alleyways directly affecting residents in the Brookside Avenue area of Polegate. 3. The Honey Farm location could not be integrated into the community of Polegate and would be a separate settlement. 4. The setting of the South Downs National Park would be harmed. 5. The setting of the adjacent historic property Wootton Manor, ist park and garden would be damaged.

Details of Changes to be Made:
Paragraph 6.29

Details of Reasons for Soundess/ Legal Complaince:

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Details of Changes to be Made:
Summary of all Representations - Proposed Submission Core Strategy Regulation 27 - Report 11th July 2011

Representation ID
979

Person ID  
522477  
Stevens

Agent ID
6.29

Details of Reasons for Soundess/ Legal Complaince:
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Details of Changes to be Made:

- Sound: Yes
- Legally Compliant: Yes

Yes
No
Justified
Effective
Consistent with national policy

Sound
Legally Compliant
Yes
No

Page 250 of 1511
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Details of Changes to be Made:
Details of Reasons for Soundess/ Legal Complaince:
The Core Strategy is sound and sets out a justified and effective land use strategy for the Polegate area which is consistent with national planning policy. Policy WCS4, Strategic Development Areas, lists as Location SD4 'Land at South Polegate and East Willingdon' Chapter 6, paragraphs 6.21 to 6.32 and Figure 8 (pages 43-46) show a clear and suitable set of proposals. There is to be no development west of Polegate; housing is proposed to be located in an urban extension south of Polegate and east of Willingdon (Hindslands and Mornings Mill). Paragraph 6.27 of the Core Strategy states: A site was allocated in the 2005 Non Statutory Wealden Local Plan for an urban extension to the north west of Polegate in the vicinity of Honey Farm. However, this proposal was dependent upon the provision of the Folkington Link and other community infrastructure to enable the integration of development into the town. No such infrastructure has been provided or is known to be planned. Since this allocation for South Downs has achieved National Park status and the adjacent Wootton Manor has formally been included in the English Heritage Register of Historic Parks and Gardens. This site has been re-assessed as part of SHLAA and is no longer considered suitable for housing. Figure 8 shows that the land west of Polegate north of the railway line will stay as open countryside adjacent to the National Park. Paragraph 6.27 of the Core Strategy is strongly supported. The Honey Farm of West of Polegate (Pelham Homes) site was included in the Non-Statutory Local Plan in 2004 but that Plan was never subject to a Public Inquiry. Those affected by the Honey Farm Site were not permitted in 2004-05 to oppose it by advancing a different location for the housing, as the opportunity to propose a different location was stated then to be given by the Local Development Framework process in 2005 - 07. That was delayed and this stage has only now been reached with this Core Strategy. The overwhelming arguments against the Honey Farm location have now been accepted by the District Council. These arguments are: 1. The Honey Farm location would be an isolated development cut off by the A27 trunk road - the 'Folkington Link' no longer being in the trunk road programme. 2. Foot and cycle access to the Honey Farm site would be permanently by footbridges and alleyways directly affecting residents in the Brookside Avenue area of Polegate. 3. The Honey Farm location could not be integrated into the community of Polegate and would be a separate settlement. 4. The setting of the South Downs National Park would be harmed. 5. The setting of the adjacent historic property Wootton Manor, its park and garden would be damaged. The Core Strategy is justified in rejecting the Honey Farm location. The proposed housing location at Hindsland and Mornings Mill is sound and justified. If that housing location does not prove to be the best site on further study, the preferred location for housing in the Polegate Town Council Masterplan should be chosen. This is the area north of Polegate and south of the A27 bypass which is also considered suitable in the 2010 Strategic Housing Lane Availability Assessment.

Details of Changes to be Made:

Yes

Sound  Yes  No  Justified  Effective  Consistent with national policy

Legally Compliant  Yes  No
Details of Reasons for Soundess/ Legal Complaince:
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Details of Changes to be Made:
Representation ID  
930  
Person ID Ms Bright  
533648  
Agent ID  
6.29  

Paragraph 6.29  
Details of Reasons for Soundess/ Legal Complaince:  
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Details of Changes to be Made:
Details of Reasons for Soundess/ Legal Complaince:

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Details of Reasons for Soundess/ Legal Complaince:
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Details of Changes to be Made:

Yes
Sound
☑ Yes
☐ No
☐ Justified
☐ Effective
☐ Consistent with national policy
☑ Legally Compliant
☐ Yes
☐ No
Details of Reasons for Soundess/ Legal Complaince:
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Details of Changes to be Made:

Representation ID
806
Person ID Mr & Flittner
Agent ID
106034
Paragraph 6.29
Sound ☑ Yes ☐ No ☑ Justified ☑ Effective ☑ Consistent with national policy
Legally Compliant ☐ Yes ☐ No

Details of Reasons for Soundess/ Legal Complaince:
The council’s comments make it clear that these allocations are undeliverable as things stand at the moment, and they seem to have no idea how and if it will be possible to overcome the identified constraints regarding the roads and waste water infrastructure. There these allocations are unsound and contrary to national policy and SHLAA criteria.

Details of Changes to be Made:
These allocations should be deleted and reallocated to deliverable and sustainable sites.
Details of Reasons for Soundess/ Legal Complaince:

6.29 states that the provision of housing in Polegate would allow for opportunities to maximize the potential for shopping provision within the town centre of Polegate. Polegate Town Council feel this statement is flawed in that it is more likely that residents would use the road system to access Eastbourne retails facilities. What is the potential for shopping provision within Polegate town centre, when elsewhere the document states there is a physical constraint on the High Street.

Details of Changes to be Made:

Sound  No  Justified  Effective  Consistent with national policy
Legally Complainant  No

Details of Reasons for Soundess/ Legal Complaince:

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Details of Changes to be Made:
Paragraph 6.3
Details of Reasons for Soundess/ Legal Complaince:
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Details of Changes to be Made:
Details of Reasons for Soundess/ Legal Complaince:

I understand that although a proposal to develop the Hindsland/ Mornings Mill area was rejected only a few years ago, another such plan is under consideration. Whilst the original deadline (28 March 2011) has passed, my local parish council officer advises me that the period for representations has now been extended. Would you therefore please register my disapproval to the plans to create a large development, which will add to the already rapid increase in the size of Eastbourne over the past thirty years. The rate of development in and around Eastbourne in that period seems to far exceed that of other neighbouring seaside towns (e.g. Hastings and Brighton). In my view one of the problems of planning in the local area is that Eastbourne and its surrounding villages are governed by separate authorities, when dual, all- encompassing approach is needed. Development inside or just outside the town can have great ramifications for those living either side of the town boundary. My reasons for opposing this proposal can be summarised as follows: Environmental The area provides a rare green lowland corridor in the otherwise unbroken development which threatens to swallow Polegate (in the same way as has happened to Stone Cross) into the Eastbourne conurbation. The area at risk includes old woodland which provides a home to much wildlife. Traffic Problems Secondly, the traffic on Eastbourne Road, Willingdon is already too heavy due to the peculiar geographical location of Eastbourne (hemmed in by the Downs) and the lack of approach roads. In high season the number of people in the town doubles, exacerbating the problem. Furthermore the lack of good roads linking Brighton, Crawley/ Gatwick and Greater London with Eastbourne and Hastings already causes unacceptable levels of traffic congestion and has hindered local economic growth. Encouraging more people to live in the Eastbourne conurbation which hosts a dwindling number of jobs will only cause more traffic problems. Local industrial development needs modern road networks to the east of the A23/ M23 road. Any attempt at boosting the local economies without providing a dual carriageway road from Lewes to Hastings, and on the A22 from Hailsham to Uckfield and beyond along the A272, will, I believe, be doomed to failure. Impact on local Services Lastly, whilst I believe good roads are the main pre-requisite for commercial or residential development, sufficient infrastructure provided by local services needs to be in place. Currently local health services are overstretched. Units at the Eastbourne District General hospital are under threat and Eastbourne charities are struggling to cope. Cuts in local Social Services are likely. If such housing developments are necessary, in my view they should be small scale and in areas nearer to good transport links and jobs. The East/ West Sussex border areas near Burgess Hill, Haywards Heath, Uckfield and East Grinstead at present offer more suitable locations for such developments. Only if there is a serious upgrading of the road network as mentioned above and considerable long term investment in the local social infrastructure, would a slight increase in housing and commercial property development in the Willingdon/ Polegate/ Stone Cross area possibly be justified.

Details of Changes to be Made:

Undertake the above proposals.
Vision and Spatial Planning Objectives - Support 2.1 We support the WDC’s Spatial Planning Objectives (SPO1 – SP15). We consider the Objectives promote sustainable growth and strike an appropriate balance to accommodate that growth given the environmental and infrastructure requirements of the District. The Objectives will support Wealden’s aspiration to retain its rural character and high quality environment whilst achieving sufficient growth to support its economy, regenerate market towns and tackle deprivation. 2.2 To meet the ‘justified’ test of soundness, “the most appropriate strategy when considered against reasonable alternatives” needs to be explored. PPS12 expands on this further: ‘the ability to demonstrate that the plan is the most appropriate when considered against reasonable alternatives delivers confidence in the strategy. It requires the local planning authority to seek out and evaluate reasonable alternatives promoted by themselves and others to ensure that they bring forward those alternatives which they consider the LPA should evaluate as part of the plan making process. There is no point in inventing alternatives if they are not realistic. Being able to demonstrate that the plan is the most appropriate having gone through an objective process of assessing alternatives will pay dividends in terms of easier passage for the plan through the examination process. It will assist in evaluating the claims of those who wish to oppose the strategy.’ (PPS12, para 4.38 – PPS12’s own emphasis shown in italics) 2.3 In order to provide for a suitable strategy that strikes the right balance, WDC has prepared an extensive Evidence Base which identifies and assesses the various options available to WDC. These options are reviewed within the Background Papers (BP), in particular, BP1: Development of the Proposed Submission Core Strategy (section 5) and BP10: Sustainability Appraisal of Proposed Submission Core Strategy (Table 1.2). The Background Papers demonstrate the ‘appropriateness’ of the current proposed strategy, that ‘reasonable alternatives’ have been tested and that the Spatial Planning Objectives are found on ‘robust evidence’ i.e. the visions are ‘justified’ as required by PPS12. 2.4 The previous Spatial Development Options (June 2009) Consultation tested up to six different housing scenarios to accommodate the South East Plan (May 2009) housing target. In the light of the revocation of the RSS paragraphs 5.9 and 5.10 of BP1: Development of the Proposed Submission Core Strategy set out the steps which were addressed in determining the overall revised quantum of growth and the suitability of the proposed locations to accommodate this growth: ‘The Local Strategic Partnership focused upon meeting housing needs across the District, whilst Parish and Town Council’s within Wealden provided information on local growth issues and preferences’. This is further explored in paragraphs 5.11 – 5.37 and Section 7 of BP1: Development of the Proposed Submission Core Strategy including an assessment of the settlement hierarchy. 2.5 Section 8 of BP1: Development of the Proposed Submission Core Strategy is supported by section 8 of BP10: Sustainability Appraisal of Proposed Submission Core Strategy which in turn supports the Spatial Planning Objectives within the Core Strategy. The Options tested are considered realistic and are not ‘artificial’ as set out in paragraph 38 of PINS ‘Learning From Experience’ (Sept 2009) document, which states, ‘in some instances it appears that options are identified for the sake of having options rather than because they are realistic….if the options are limited there is no point in trying to artificially create them’. 2.6 The Spatial Planning Objectives therefore provide a clear vision and are specific to the challenges of the District. They are supported by the Evidence Base which has a clear audit trail, has tested all the reasonable alternatives and is therefore ‘justified’. Furthermore, the Objectives are consistent with National Policy including ‘emerging’ National Guidance contained in the Localism Bill (i.e. the level of housing has been determined by a locally derived need).

Details of Changes to be Made:
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<table>
<thead>
<tr>
<th>Representation ID</th>
<th>Person ID</th>
<th>Agent ID</th>
<th>Details of Reasons for Soundess/Legal Complaince:</th>
<th>Details of Changes to be Made:</th>
</tr>
</thead>
<tbody>
<tr>
<td>1321</td>
<td>Mr Ankers</td>
<td>South Downs Society</td>
<td>We generally support all 15 of the Spatial objectives but SPO1 (countryside and rural areas) should make specific mention of the downs.</td>
<td></td>
</tr>
<tr>
<td>1435</td>
<td>Ms Mears</td>
<td>Environment Agency</td>
<td>We are pleased that you have avoided all areas at risk of flooding for strategic allocations in your Core Strategy. You have identified Uckfield Town Centre as a broad location for development which, as you know, is at risk of flooding from the River Uck which runs through the town centre. The preferred approach recommended by the River Ouse Catchment Flood Management Plan (CFMP) is a reinstatement of functional floodplain through Uckfield by implementing sustainable land management. This approach is also supported by the Government’s Strategy for flood and coastal erosion management, ‘Making Space for Water’ (Defra 2005). This would also be consistent with your Strategy Objective to reduce the risk of flooding and the consequential damage to property and public well being. You will need to take this into account in your Site Allocations DPD.</td>
<td></td>
</tr>
</tbody>
</table>

Page 263 of 1511
Details of Reasons for Soundness/ Legal Compliance:
Policy SPO10 is unsound as it is ambiguous and does not reflect national planning policy. Planning Policy Statement 25, Development and Flood Risk (PPS25) clearly states the acceptability of development in the various flood zones for example, PPS25 advises that areas with a high probability of flooding (3A) are suitable for 'less vulnerable' development such as industry, storage and distribution, offices, shops etc. As drafted policy SP010 is misleading as it implies that all economic development in areas of medium and high flood risk will be treated unfavourably. Please see the Indigo Planning letter dated 15 April 2011.

Details of Changes to be Made:
Policy SPO10 is unnecessary as there is sufficient national planning policy on the subject. PPS25 provides clear and effective planning guidance on development in areas of flood risk. Therefore, SPO10 should be deleted.

Details of Reasons for Soundness/ Legal Complaince:
Support for the overarching objectives that contribute to the Vision. They are laudable and, we believe, achievable in broad terms across the district.

Details of Changes to be Made:
'Suitable parking provision' to support retailing and other business is ambiguous. There is clear concern of traffic impact on Ashdown Forest (3.32), parking issues at Polegate station (6.25) and limited supply of brownfield development opportunity (5.8). Policies rightly aspire to cut traffic, combat climate change, avoid flood risk areas, improve safety and maximise use of previously developed land. Parking is a key element in making these effective.
Summary of all Representations - Proposed Submission Core Strategy Regulation 27 - Report 11th July 2011

Representation ID
266
Person ID  Mr Hurwood
134707  CPRE Sussex, Wealden South Group
Agent ID
Box 12
Sound  ☑ Yes  ☐ No  ☐ Justified  ☐ Effective  ☐ Consistent with national policy
Legally Compliant  ☐ Yes  ☐ No

Details of Reasons for Soundess/ Legal Complaince:
Details of Changes to be Made:
SPO11 We would like to see specific areas proposed as green corridors, wildlife/environmentally protected areas to link important sites, such as areas of ancient woodland.

Representation ID
502
Person ID  Ashdown
522134  Natural England
Agent ID
Box 12
Sound  ☑ Yes  ☐ No  ☐ Justified  ☐ Effective  ☐ Consistent with national policy
Legally Compliant  ☐ Yes  ☐ No

Details of Reasons for Soundess/ Legal Complaince:
Details of Changes to be Made:
Natural England commends the Council on its recognition of the importance of the environment and green infrastructure and the need to provide resilience for climate change. We particularly support spatial planning objectives SP01, SP07 SP09 and SP011

Representation ID
690
Person ID  Mr Beams
519685  Willingdon and Jevington Parish Council
Agent ID
Box 12
Sound  ☐ Yes  ☐ No  ☐ Justified  ☐ Effective  ☐ Consistent with national policy
Legally Compliant  ☐ Yes  ☐ No

Details of Reasons for Soundess/ Legal Complaince:
The Core Strategy refers frequently to the lack of suitable recreational facilities, so the plan to build on an existing one SD4 is inconsistent.
Details of Changes to be Made:
### Representation ID 1141

<table>
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<tr>
<th>Person ID</th>
<th>Mr Watkins</th>
<th>Agent ID</th>
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<tbody>
<tr>
<td>328932</td>
<td>Kitewood estates</td>
<td>Box 12</td>
</tr>
</tbody>
</table>

**Sound**
- ☑ Yes
- ☑ No
- ☑ Justified
- ☐ Effective
- ☐ Consistent with national policy

**Legally Compliant**
- ☐ Yes
- ☐ No

**Details of Reasons for Soundess/ Legal Complaince:**
The policy should therefore support planning application which provides significant open space, leisure or recreational facilities.

**Details of Changes to be Made:**

### Representation ID 1322

<table>
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<tr>
<th>Person ID</th>
<th>Mr Ankers</th>
<th>Agent ID</th>
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</thead>
<tbody>
<tr>
<td>106660</td>
<td>South Downs Society</td>
<td>Box 12</td>
</tr>
</tbody>
</table>

**Sound**
- ☑ Yes
- ☐ No
- ☐ Justified
- ☐ Effective
- ☐ Consistent with national policy

**Legally Compliant**
- ☐ Yes
- ☐ No

**Details of Reasons for Soundess/ Legal Complaince:**
We generally support all 15 of the Spatial objectives but SPO1 (countryside and rural areas) should make specific mention of the downs.

**Details of Changes to be Made:**
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<tr>
<td>Person ID</td>
<td>Mrs Rudin</td>
</tr>
<tr>
<td>Agent ID</td>
<td>Forest Row Parish Council</td>
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<tr>
<td>Sound</td>
<td>Yes</td>
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<tr>
<td>Legally Compliant</td>
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**Details of Reasons for Soundess/ Legal Complaince:**

Support for the overarching objectives that contribute to the Vision. They are laudable and, we believe, achievable in broad terms across the district.

**Details of Changes to be Made:**
Summary of all Representations - Proposed Submission Core Strategy Regulation 27 - Report 11th July 2011

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<td>107737</td>
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Details of Reasons for Soundness/ Legal Complaince:

7 Landscape 7.1 Introduction 7.1.1 In this section of the report we present our representations in regard to landscape matters in and informing the Core Strategy. Our representation is made in regard to paragraphs 3.30 – 3.33 of the submission Core Strategy, Policies WC4 and WC13 and supporting background papers. 7.1.2 For the purposes of this representation we have reviewed the ‘Landscape Character Assessment and Development Option Evaluation Study’ undertaken for the district (referred hereinafter as the ‘Landscape Study’), which is included as a background paper to the Core Strategy on the Councils website. However, it is not clear how the Landscape Study has been used to inform the spatial strategy as it is not specifically referred to in the text of Core Strategy nor is the Landscape Study listed as a background paper at paragraph 1.7 of the Core Strategy (although it is included as a background paper on the Councils website). 7.1.3 We have reviewed the methodology set out in the document and we have also reviewed whether the methodology has been consistently applied resulting in a final report that is robust, thorough and transparent and one that would form a credible evidence base suitable to inform the spatial strategy contained in the Core Strategy. 7.1.4 We contend that the Landscape Study is flawed and therefore the assessment of housing sites in the district, the spatial strategy and the Councils Sustainability Appraisal, and thus the Core Strategy, is unsound. 7.1.5 Our representation is summarised below: Section of Core Strategy: Spatial Planning Objectives 1, 3 and 11, Paras 3.30 - 3.33, Policy WCS4 Strategic Development Areas, Framework. The Landscape Study is not listed as a background paper at paragraph 1.7 of the Core Strategy (although it is included as a background paper on the Councils website). 7.1.6 Paragraph 3.30 goes on to state that: “...and sites have been carefully scrutinised with regards to landscape impact.” 7.1.7 Paragraph 3.30 goes on to state that: “...and sites have been carefully scrutinised with regards to landscape impact.” 7.1.8 Paragraph 3.33 refers to Government guidance and the level of protection this provides for the environment, particularly nationally and internationally designated sites, which are not duplicated in the Core Strategy. The paragraph goes on to state: “However, our strategy has been guided by high levels of protection on local and national levels, and more detailed policies are contained within the Core Strategy and further ones in subsequent DPDs.” 7.1.9 Paragraph 1.7 in the Introduction to the Core Strategy refers to a number of specialist studies that have been produced to provide a robust evidence base to inform the Local Development Framework. The Landscape Study is not listed as a background paper at paragraph 1.7 of the Core Strategy (although it is included as a background paper on the Councils website). 7.1.10 The Core Strategy proposes that the land to the west of Uckfield be identified as a ‘strategic development area’ suitable for accommodating 1,000 homes and some 12,650 sq metres net of employment floor space and education provision as an extension to the urban area to the west of New Town. 7.1.11 In the light of the comments that follow in this section of our representations on the Landscape Study, it considered that this proposal be reassessed and, taking into account other representations made on other parts and policies contained in the Core Strategy, greater emphasis should be given to the suitability of land at Maresfield to accommodate increased housing numbers and a larger proportion of the housing requirements for the district. Policy WSC13 Green Infrastructure, Paragraphs 7.23 - 7.28 and Background Paper BP6 7.1.12 Policy WSC13 and paragraph 7.23 to 7.28 relating to Green Infrastructure is supported although it is considered that the anomalies and errors in the Landscape Study be addressed before this document is used to inform and guide the implementation of Green Infrastructure Strategy and also formulation of the specific measures for the protection and enhancement of the landscape which are to set out in the Delivery and Site Allocations DPD referred to at paragraph 7.28 of the Core Strategy. 7.1.13 It is not clear from reading the Core Strategy, how the Landscape Study has been used to inform the above policies. 7.2 Consideration of the Methodology employed in the Landscape Study 7.2.1 Wealden Council commissioned the Landscape Study from the Landscape Group at East Sussex County Council, in September 2007. It was published in February 2009. The purpose of the Study is to: 1. Inform the preparation of WDC Local Development Framework Core Strategy and; 2. Inform the development policies on landscape management and protection. 7.2.2 The Landscape Study states that it will: 1. Assess the existing landscape character of key search areas 2. Assess the quality and value of the existing landscape in these key search areas 3. Assess the sensitivity if the existing landscape and its capacity to accept change or having regard to the scope for mitigation 4. Make recommendations on preferred locations from a landscape perspective. 7.2.3 The Landscape Study purports to use a number of methodologies for the assessment and...
identifies these as being: 1. For Landscape Character/ Quality and Value - Design Manual for Roads and Bridges Vol 11, section 3, Part 5 (DT) which has been further refined by the Landscape Character Assessment Guidance for England and Scotland (CA/SNH 2002) and; 2. For landscape sensitivity – Landscape Character Assessment Guidance for England and Scotland, Topic Paper No.6: Techniques and criteria for Judging Capacity and Sensitivity (CA 2002). 7.2.4 The Landscape Study sets out, in section 2.0, the methodology and criteria used for each aspect of the landscape being assessed, including the following: 1. Landscape Quality (this should be ‘condition’ if following latest LCA guidance as the term quality is now a discredited approach to assessing landscapes) 2. Landscape Value 3. Landscape Sensitivity 4. Visual Sensitivity 5. Landscape Capacity 7.2.5 In relation to the assessment of landscape capacity, capacity is defined in Topic Paper No.6: ‘Techniques and Criteria for Judging Capacity and Sensitivity’ as: ‘The degree to which a particular landscape type or area is able to accommodate change without significant effect on its character, or overall change of landscape character type. Capacity is likely to vary according to the type and nature of change being proposed’. 7.2.6 We have reviewed the Landscape Study, in particular, the methodology set out in the document and whether this has been consistently applied to form a credible evidence base suitable to inform the spatial strategy contained in the Core Strategy. 7.2.7 The review of the Core Strategy background paper indicates that the Landscape Study has not followed the guidance in Topic Paper No.6. Topic Paper No.6 suggests that there are two approaches to assessing landscape sensitivity. These are: 1. Judging Overall Landscape Sensitivity and; 2. Judging Landscape Sensitivity to a specific type of change. 7.2.8 However, in order to assess landscape capacity, the assessment of the sensitivity of different types or areas of landscape to the type of change in question must be combined with an assessment of the more subjective or perceptual aspects of the landscape and of the value attached to the landscape. 7.2.9 The stages for assessing landscape capacity of a landscape are set out in Section 3.0 of Topic Paper No.6 and reproduced in Figure 7.1 below. Figure 7.1: Stages for assessing landscape capacity Source: Landscape Character Assessment Guidance for England and Scotland, Topic Paper No.6: Techniques and criteria for Judging Capacity and Sensitivity (CA 2002) 7.2.10 Sections 5.0 and 6.0 of Topic Paper No.6 provide the more detailed considerations that need to be taken into account. 7.2.11 The boxed text, at paragraph 2.11.2 of the Landscape Study, follows the same assessment stages used to assess the landscape capacity to accommodate a specific type of change and given the local scale of the assessment work it is considered that this is the appropriate method to use. 7.2.12 However, Topic Paper No.6, at paragraph 6.5, also goes on to state that: ‘Capacity is all a question of the interaction between the sensitivity of the landscape, the type and amount of change and the way that the landscape is valued’. 7.2.13 Sections 2.11 and 2.12 of the Landscape Study set out the approach used by East Sussex County Council landscape group in undertaking the landscape study. However, the assessment does not define the quantum of housing development used to assess the capacity of each character area, nor is the LDF Core Issues and Options Consultation Paper July 2007 referred to as a guide to the quantum of housing development used to assess each of the different character areas. The Landscape Study does however state at paragraph 2.12.3 that: ‘an overall assessment can be made for each character area on the capacity to accept the type of change being considered. This judgement is made according to the combination of characteristics that contribute to a particular area of landscape. The capacity of an area to accept change is related to the potential of the area to accommodate development in a particular location without detracting from the overall character of that landscape. The capacity evaluation of each character area does not assume that this is the capacity across the entire character area’. 7.2.14 There are a number interrelated issues raised in the above paragraph which we now turn to. 7.2.15 In relation to the type of change, the Landscape Study defines, at paragraph 2.12.6, the assumptions used for the assessment business uses, i.e. the assessment of sensitivity / capacity is based on light industrial type uses which would be consistent with a residential environment and these would be single storey units. However the Landscape Study does not define the full details of the housing use, such as type (housing - single storey / two storey / three storey etc) or amount (large / medium / small scale development) and we contend that the details of the change being considered is not transparent from the Landscape Study, although the type of change (i.e. housing) is known, the form and amount of housing is unknown. These are important factors when considering the landscape capacity of an area to accommodate development, especially if using the stages set in the Landscape Study. 7.2.16 A similar assumption to the business use (or range of assumptions) could have been used for assessing the impact on housing on landscape sensitivity / capacity of each character area. For example two to three storey houses at the following ranges: 1. small scale housing between five to 50 dwellings 2. medium scale housing development between 50 to 200 dwellings, and 3. large scale housing development between 200 to 500 dwellings. 7.2.17 In relation to the combination of the characteristics that contribute to a particular area, comments on these are made in later sections (See paragraphs 7.4.1 to 7.4.14 below). 7.2.18 The Landscape Study also refers to mitigation and management of the landscape (Section 2.13) and, in paragraph 2.13.1, it highlights that mitigation has been used to determine the visual and character sensitivity of the landscape. This approach does not accord with Topic Paper No.6 as mitigation should only be used to inform the visual sensitivity of the area assessed, (See Figure 7.1 above), and not directly the character sensitivity of an area (although visual aspects are one of the aspects that inform the character of an area). Mitigation in itself can have a significant effect on character and the landscapes capacity to accommodate development. In some cases mitigation would make an area less suitable to accommodate development not more suitable. Again this, we would contend, is a flaw in the assessment. The existing management of the landscape is relevant to determining the condition (or quality) of an area of landscape but the identification of management opportunities is not relevant to determining the capacity of the landscape to
accommodate development. Management of the land could in itself bring about a change to the landscape which is discordant with its character, for instance managing the land to encourage woodland growth or planting extensive woodlands in a very open exposed landscape would lead to a significant change. 7.2.19 The methodology section of the Landscape Study also includes a part dealing with the Areas of Outstanding Natural Beauty (AONB) within the district. Section 2.14 refers to ‘AONBs and AONB Buffer Zones’ as a way of identifying higher value landscapes within Wealden. At paragraph 2.14.2 the Landscape Study states: ‘There is, in some areas adjacent to the AONB boundary a buffer zone to the AONB landscape. This is usually an area of similar character but not of the same quality as the AONB landscape and not covered by the same planning policy. Where relevant these areas are indicated in the figures’. 7.2.20 Paragraph 2.14.4, the Landscape Study goes on the state the following: ‘These buffer zones have been identified through the character area analysis. The relative sensitivity of these areas has been considered according to the landscape character to achieve a balanced comparison with AONB and AONB landscapes’. 7.2.21 The Landscape Study considers that there is support for this ‘buffer zone’ approach due to Policy EN2 (f) of the East Sussex and Brighton and Hove Structure Plan. We contend that this approach is flawed and unsound. Firstly, the Structure Plan has been superseded by the South East Plan and at the time of preparing the Landscape Study during the period August 2007 to February 2009, both East Sussex County Council and Wealden District Council would have been aware of the emerging South East Plan and through the draft regional plan. Secondly, Policy EN2 (f) does not prohibit development but seeks to protect the Sussex Downs and High Weald AONBs and minimise the impact of development within them by requiring measures to integrate the development into the landscape. Thirdly, there is no Government policy support for the concept of ‘AONB buffers’ in Planning Policy Statement No.7. Like Policy EN2 of the Structure Plan, PPS 7 does not prohibit development within the boundaries or adjoining an AONB but merely seeks to ensure that the landscapes within AONBs are considered carefully and appropriate measures taken to mitigate the harm that potential development may cause. 7.2.22 The fourth point is that, whilst the Council would seek support from Policy EN2 (f) as a way of ‘balancing the comparison between AONB and non AONB areas’ especially the areas of landscape close to the AONB boundary, the East Sussex and Brighton and Hove Structure Plan does not define the extent of the buffer zone on the Key Diagram nor is the extent of the buffer area set out in its explanatory text. We contend that the justification for this approach must be given very little weight. 7.2.23 Lastly, it is acknowledged that some areas of landscape within an AONB may be of poorer condition (quality) score and / or lower visual and character sensitivity than areas outside of the AONB but the adjustment in the landscape sensitivity / capacity scoring by introducing what appears to be an arbitrary AONB buffer zone seems to undermine the purposes and status of the AONB designation,(and its planning policy protection), by attaching increased value to a character area that adjoins the AONB which although it may be of a similar character, does not meet the quality criteria for inclusion within the AONB. In addition, it is noted that the Landscape Study has not been subject to peer review and there is no evidence that it has had stakeholder input / consultation with statutory consultees, such Natural England / High Weald AONB Joint Advisory Committee and other interested bodies to agree this approach to the AONBs. 7.2.24 The Study goes on to set out the method used to undertake a comparative evaluation of a potential development area within a character area which has capacity to accommodate development. This gives an early indication of sites which would be worthy of further consideration for development in landscape terms. We contend that the comparative assessment of character areas within the District is flawed as the starting point for the assessment the landscape sensitivity / capacity analysis is unsound for the reason given above. 7.2.25 Notwithstanding the above point, Section 2.15.4 of the Landscape Study states that: ‘Prior to coming to a firm view on the full potential and scope in these areas further investigation would be required’. 7.2.26 However, the Study does not present evidence of this further investigation or how preferred development areas have been chosen; for example there is no detailed assessment of the west of Uckfield area although this has been identified as a major urban extension area under Policy WCS4 - SD1. 7.3 Critical Review of the findings of the Landscape Study 7.3.1 The Landscape Study methodology sets out how each landscape character is to be assessed and the information recorded using landscape character assessment sheets (section 2.5) whilst section 2.17 of the Landscape Study refers to mapping which is split into two stages. Stage 1 relates to recording baseline information on each character area such as planning designation, Public Right of Way and key viewpoint, focal point, landscape features and detractors (which should be read with the assessment record sheets). Stage 2 relates to the identification of potential development areas with indicative boundaries and also identifies key woods, shaws, hedges, tree belts etc and also the potential for mitigation planting. 7.3.2 In order to assess the robustness of the landscape capacity study for the purpose of this representation, the area around Uckfield, Maresfield and Five Ash Down were visited and the baseline information recorded on the landscape assessment sheets checked and the judgements reached reviewed. This check revealed that that were a number of elements / features not recorded or identified for some areas and therefore these factors were not able to inform the judgement reached. 7.3.3 For example, ‘Maresfield Area A’, is described as: ‘An open, undulating landscape used for pasture to the west and pleasure to the east. It is ungrazed showing some scrub. Wide long views to the south. Surrounded on other sides by mature trees and exotic Eucalyptus and Cedars from nearby Park. Fine houses on outskirts and within site. Fine clumps of Pines. Some road noise adjoins picturesque recreation ground’. 7.3.4 The assessment sheet omits a number of important features such as areas of woodlands and plantations, (some of which are ancient woodlands and provide screening, containment and form visual barriers). Hedges, fences, footpaths and reference to the bypass were not recorded. The assessment sheet also refers to parkland and that the majority of the land is amenity land lacking management. A wide long view(s) out to
the south is highlighted as a key feature which is correct when looking south from a small part of the area but elsewhere views are contained and obscured by landform and vegetation. The record sheet includes a photograph of the view south but this is not taken from the recreation ground as recorded on the map Figure 52. The photograph was taken from private land on the footpath. 7.3.5 In the visual appraisal section of the assessment sheet it records the local receptors as amenity land and houses, types of view as long views from top of ridge to the south and visual barriers as landform / trees and hedges. It concludes that the sensitivity is high (see table 7.1 below). It is acknowledged that there are views within the area but these tend to be short partial or glimpsed views with long views out towards the south from high ground in the north eastern parts of character area. Views into the area are very limited and development within the area would have a minimal impact on views. However, in views from the ridge to the south the recreation occupying the north eastern parts of the character area is seen whilst the remaining areas are hidden from view and therefore the visual sensitivity of the majority of the area is low. 7.3.6 The resultant evaluation of this area was considered as follows: Table 7.1: Landscape Study Assessment, Maresfield Area A Character Area Maresfield A Quality Good Value Medium Sensitivity to Change Moderate Visual Sensitivity High Management Opportunities Mange hedges and grazing. Mange recreational spaces and access to countryside. Need to retain gap between Maresfield and Uckfield. Potential for Mitigation LowPlanting would change open character and obscure long views out from recreation ground Capacity to Accept Change: Housing LowClose to village edge only Capacity to Accept Change: Business Low 7.3.7 We contend that the record sheets are incorrect and the judgement on quality / condition is erroneous and should be ‘ordinary’ as most of the land is unmanaged comprising rank grassland of little intrinsic landscape value and the visual sensitivity of the area is ‘moderate or low’ due to the strong enclosure afforded to the area. It is interesting to note that one of the management opportunities is to retain a gap between Maresfield and Uckfield although there is no planning policy support for the retention of gaps in the Core Strategy or previous Non Statutory Wealden Local Plan. 7.3.8 By comparison, another example is Character Area L – land to the west of Uckfield, which is described as: ‘Land sloping away from urban edge to Uck valley and A26 Uckfield by pass. Strong field structure with arable and pasture. Some large fields. Sewage works detractors. Few focuses of character. Development would need a well defined edge to prevent creep’. 7.3.9 The assessment sheet for this character area has recorded the land cover and landscape elements correctly but has not recorded any landform features and relatively few aesthetic factors, although it describes the land as sloping away from the urban edge with a strong field structure with arable and pasture. The landscape condition is considered to be fair which is not defined in the methodology although this changes to ordinary in the comparison table. 7.3.10 In the visual appraisal section of the assessment sheet it records the local receptors as countryside on the other side of Uck Valley, isolated properties, footpaths and A26 and houses on the urban edge, types of view as views across to woods at West Park / Butchers Wood, wooded ridge of Shortbridge across Uckfield Valley and visual barriers as few. It concludes that the sensitivity is ‘moderate’ (see table 7.2). Table 7.2: Landscape Study Assessment, Uckfield Area L Character Area Uckfield L Quality Ordinary Value MediumSnawAccessible for recreational Sensitivity to Change Moderate Visual Sensitivity Moderate High on ridge Management Opportunities Mange urban fringe. Farm diversification pressure. Manage wood and existing trees and hedges Potential for Mitigation ModerateLow on ridge as need to retain open fields Soften urban edge. Create green network. Relocate recreation ground Capacity to Accept Change: Housing ModerateNeed well defined boundaries close to urban edge avoid high ground Capacity to Accept Change: Business No capacity 7.3.11 We contend that the record sheets are incorrect and the judgement on quality / condition is under estimated and should be ‘good’ as most of the land is attractive farmed landscape with some distinctiveness features with a recognisable landscape structure. The assessment sheet ignores the open exposed nature of this character area, with long views south and west and numerous views in to the area from the surrounding countryside (roads and footpaths), and therefore the visual sensitivity of the area should be ‘high’ due the number of viewpoints where views can be obtained. This can be compared to the Maresfield A area which is considered to have ‘high’ sensitivity rating but with a few vantage points available where development impacts will be perceived. 7.3.12 We also note that under management opportunities it is considered that the area could contribute to managing the urban fringe, which could equally apply to the land at Maresfield, and that under the potential for mitigation heading is considered that the area has a ‘moderate’ ability, although the introduction of mitigate planting as shown Figure 11 of the landscape Study would dramatically and significantly change the landscape character of the area. 7.3.13 These examples illustrate the inconsistency of the landscape assessment record sheet and the arbitrary nature of the judgements made. It does not give any confidence to the manner in which the Landscape Study has been undertaken or to the transparent way that the judgements have been reached. 7.4 Implications for the soundness of the Core Strategy 7.4.1 We have reviewed the ‘Landscape Character Assessment and Development Option Evaluation Study’ of the district. It is not clear how this Landscape Study has been used to inform the spatial strategy as it is not specifically referred to in the Core Strategy, nor is the Landscape Study listed as a background paper at paragraph 1.7 of the Core Strategy (although it is included as a background paper on the Councils website). 7.4.2 We have reviewed the methodology set out in the document and we have also reviewed whether the methodology has been consistently applied resulting in a final report that is robust, thorough, and transparent and that it would form a credible evidence base suitable to inform the spatial strategy contained in the Core Strategy. The Study also includes a methodology employed to undertake a comparative evaluation of a potential development area within a character area which has capacity to accommodate development. 7.4.3 The examples referred to in our analysis above illustrate the inconsistency of the landscape assessment record sheets and arbitrary nature of the judgements made and it does not give any confidence to the manner in which the
Landscape Study has been undertaken or to the transparent way that the judgements have been reached. 7.4.4 We contend that the Landscape Study is flawed and therefore the assessment of housing sites in the district, the spatial strategy and the Councils Sustainability Appraisal is unsound. In addition, in relation to the comparison assessment of sites within the district surrounding the towns and villages; we contend that this comparative assessment of character areas is flawed as the starting point for the assessment the landscape sensitivity / capacity analysis is unsound for the reason given above. 7.4.5 The Core Strategy proposes that the land to the west of Uckfield be identified as a ‘strategic development area’ suitable for accommodating 1,000 homes and some 12,650 sq metres net of employment floor space and education provision as an extension to the urban area to the west of New Town. In the light of the comments made on the Landscape Study, it is considered that this proposal be reassessed and, (taking into account the other representations made on other parts and policies contained in the Core Strategy), greater emphasis be given to the suitability of land at Maresfield to accommodate increased housing numbers and a larger proportion of the housing requirements for the district. 7.4.6 Policy WSC13 relating to Green Infrastructure is supported although it is considered that the anomalies and errors in the Landscape Study be addressed before this document is used to inform and guide the implementation of Green Infrastructure Strategy and also formulation of the specific measures for the protection and enhancement of the landscape which are to set out in the Delivery and Site Allocations DPD referred to at paragraph 7.28 of the Core Strategy. 

Details of Changes to be Made:
SUMMARY 7.4.7 In conclusion, we contend that the Core Strategy is unsound because: 1. It is not justified as it is not based on a sound evidence base as the Landscape Study (Landscape Character Assessment and Development Options Evaluation Study of the District) is flawed and therefore the assessment of housing sites in the district, the spatial strategy and the Councils Sustainability Appraisal is unsound. It is not clear how the Landscape Study has been used to inform the spatial strategy as it is not specifically referred to in the Core Strategy nor is the Landscape Study listed as a background paper at paragraph 1.7 of the Core Strategy; 2. It is not justified because the Landscape Study as it is not robust, thorough, and transparent and that it does not form a credible evidence base suitable to inform the spatial strategy contained in the Core Strategy. The Landscape Study contains a number inconsistencies set out in the landscape assessment record sheets and contains a number of arbitrary judgements and so it does not give any confidence to the manner in which the Landscape Study has been undertaken or to the transparent way that the judgements have been reached 3. It is not consistent with national policy as the methodology for undertaking the Landscape Study (which has been used to inform the spatial strategy) refers to ‘AONB and AONB Buffer Zones’ as a way of identifying higher value landscapes. There are a number of reasons why this approach is unsound but there is no Government policy support for the concept of ‘AONB buffers’ in Planning Policy Statement No.7 or any other policy guidance.

Representation ID
728
Person ID  Mr Clarke MSc
Agent ID  Bluebell Railway Plc
Box 13
Sound  Yes  No  Justified  Effective  Consistent with national policy
Legally Compliant  Yes  No
Details of Reasons for Soundess/ Legal Complaint:
Support for safeguarding Uckfield to Lewes Railway route
Details of Changes to be Made:
Consistent with national policy
Effective
Justified

(section 5) and BP10: Sustainability Appraisal of Proposed Submission Core Strategy (Table 1.2). The
within the Background Papers (BP), in particular, BP1: Development of the Proposed Submission Core Strategy
Evidence Base which identifies and assesses the various options available to WDC. These options are reviewed
Background Papers demonstrate the ‘appropriateness’ of the current proposed strategy, that ‘reasonable
accommodate that growth given the environmental and infrastructure requirements of the District. The Objectives
Vision and Spatial Planning Objectives - Support 2.1 We support the WDC’s Spatial Planning Objectives (SPO1 –
Wealden provided information on local growth issues and preferences’. This is further explored in paragraphs 5.11
quantum of growth and the suitability of the proposed locations to accommodate this growth: ‘The Local Strategic
sufficient growth to support its economy, regenerate market towns and tackle deprivation. 2.2 To meet the
appropriate when considered against reasonable alternatives delivers confidence in the strategy. It requires the
local planning authority to seek out and evaluate reasonable alternatives promoted by themselves and others to
sure that they bring forward those alternatives which they consider the LPA should evaluate as part of the plan
making process. There is no point in inventing alternatives if they are not realistic. Being able to demonstrate that the plan is the most appropriate when considered against reasonable alternatives delivers confidence in the strategy. It requires the
Objectives therefore provide a clear vision and are specific to the challenges of the District. They are
the settlement hierarchy. 2.5 Section 8 of BP1: Development of the Proposed Submission Core Strategy is
The Options tested are considered realistic and are not ‘artificial’ as set out in paragraph 38 of PINS ‘Learning From Experience’ (Sept 2009) document, which
states, ‘in some instances it appears that options are identified for the sake of having options rather than because they are realistic….if the options are limited there is no point in trying to artificially create them’. 2.6 The Spatial Planning Objectives therefore provide a clear vision and are specific to the challenges of the District. They are
supplied by the Evidence Base which has a clear audit trail, has tested all the reasonable alternatives and is therefore ‘justified’. Furthermore, the Objectives are consistent with National Policy including ‘emerging’ National Guidance contained in the Localism Bill (i.e. the level of housing has been determined by a locally derived need).
Details of Changes to be Made:
Vision and Spatial Planning Objectives - Support 2.1 We support the WDC’s Spatial Planning Objectives (SPO1 –
Wealden’s aspiration to retain its rural character and high quality environment whilst achieving
sufficient growth to support its economy, regenerate market towns and tackle deprivation. 2.2 To meet the
‘justified’ test of soundness, “the most appropriate strategy when considered against reasonable alternatives”
needs to be explored. PPS12 expands on this further: ‘the ability to demonstrate that the plan is the most appropriate when considered against reasonable alternatives delivers confidence in the strategy. It requires the
local planning authority to seek out and evaluate reasonable alternatives promoted by themselves and others to
ensure that they bring forward those alternatives which they consider the LPA should evaluate as part of the plan
making process. There is no point in inventing alternatives if they are not realistic. Being able to demonstrate that the plan is the most appropriate having gone through an objective process of assessing alternatives will pay
dividends in terms of easier passage for the plan through the examination process. It will assist in evaluating the claims of those who wish to oppose the strategy.’ (PPS12, para 4.38 – PPS12’s own emphasis shown in italics)  

2.3 In order to provide for a suitable strategy that strikes the right balance, WDC has prepared an extensive Evidence Base which identifies and assesses the various options available to WDC. These options are reviewed within the Background Papers (BP), in particular, BP1: Development of the Proposed Submission Core Strategy (section 5) and BP10: Sustainability Appraisal of Proposed Submission Core Strategy (Table 1.2). The Background Papers demonstrate the ‘appropriateness’ of the current proposed strategy, that ‘reasonable alternatives’ have been tested and that the Spatial Planning Objectives are found on ‘robust evidence’ i.e. the visions are ‘justified’ as required by PPS12. 2.4 The previous Spatial Development Options (June 2009) Consultation tested up to six different housing scenarios to accommodate the South East Plan (May 2009) housing target. In the light of the revocation of the RSS paragraphs 5.9 and 5.10 of BP1: Development of the Proposed Submission Core Strategy set out the steps which were addressed in determining the overall revised quantum of growth and the suitability of the proposed locations to accommodate this growth: ‘The Local Strategic Partnership focused upon meeting housing needs across the District, whilst Parish and Town Council’s within Wealden provided information on local growth issues and preferences’. This is further explored in paragraphs 5.11 – 5.37 and Section 7 of BP1: Development of the Proposed Submission Core Strategy including an assessment of the settlement hierarchy. 2.5 Section 8 of BP1: Development of the Proposed Submission Core Strategy is supported by section 8 of BP10: Sustainability Appraisal of Proposed Submission Core Strategy which in turn supports the Spatial Planning Objectives within the Core Strategy. The Options tested are considered realistic and not ‘artificial’ as set out in paragraph 38 of PINS ‘Learning From Experience’ (Sept 2009) document, which states, ‘in some instances it appears that options are identified for the sake of having options rather than because they are realistic….if the options are limited there is no point in trying to artificially create them’. 2.6 The Spatial Planning Objectives therefore provide a clear vision and are specific to the challenges of the District. They are supported by the Evidence Base which has a clear audit trail, has tested all the reasonable alternatives and is therefore ‘justified’. Furthermore, the Objectives are consistent with National Policy including ‘emerging’ National Guidance contained in the Localism Bill (i.e. the level of housing has been determined by a locally derived need).

Representation ID  
1323  
Person ID Mr Ankers  
Agent ID South Downs Society  
Sound ☑ Yes ☐ No ☐ Justified ☐ Effective ☐ Consistent with national policy  
Legally Compliant ☐ Yes ☐ No  
Details of Reasons for Soundess/ Legal Complaince: 
We generally support all 15 of the Spatial objectives but SPO1 (countryside and rural areas) should make specific mention of the downs.  
Details of Changes to be Made:  

Representation ID  
1534  
Person ID Mrs Rudin  
Agent ID Forest Row Parish Council  
Sound ☑ Yes ☐ No ☐ Justified ☐ Effective ☐ Consistent with national policy  
Legally Compliant ☐ Yes ☐ No  
Details of Reasons for Soundess/ Legal Complaince: 
Support for the overarching objectives that contribute to the Vision. They are laudable and, we believe, achievable in broad terms across the district.  
Details of Changes to be Made:
Details of Reasons for Soundness/ Legal Complaince:

‘Suitable parking provision’ to support retailing and other business is ambiguous. There is clear concern of traffic impact on Ashdown Forest (3.32), parking issues at Polegate station (6.25) and limited supply of brownfield development opportunity (5.8). Policies rightly aspire to cut traffic, combat climate change, avoid flood risk areas, improve safety and maximise use of previously developed land. Parking is a key element in making these effective.

Details of Changes to be Made:

‘Suitable parking provision’ should clearly avoid being ‘excessive’, in pursuit of these policies. A significant quantity of current parking space should be available for brownfield redevelopment. Car free developments should be encouraged and supported.

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Details of Reasons for Soundness/ Legal Complaince:

Policies to restrain traffic, obtain modal shift in travel, reducing need to travel and improve the experience of non-car travel need to be sharpened and focused. Aspirations for these to happen must have necessary circumstances incorporated into the policies.

Details of Changes to be Made:

Demand management techniques for traffic in Hailsham (6.15) should be included in all the related and equivalent policies. There should be a definite commitment to traffic reduction measures and targets throughout the Strategy Plan document.

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Details of Reasons for Soundness/ Legal Complaince:

We generally support all 15 of the Spatial objectives but SPO1 (countryside and rural areas) should make specific mention of the downs.

Details of Changes to be Made:
Vision and Spatial Planning Objectives - Support 2.1 We support the WDC’s Spatial Planning Objectives (SPO1 – SP15). We consider the Objectives promote sustainable growth and strike an appropriate balance to accommodate that growth given the environmental and infrastructure requirements of the District. The Objectives will support Wealden’s aspiration to retain its rural character and high quality environment whilst achieving sufficient growth to support its economy, regenerate market towns and tackle deprivation. 2.2 To meet the ‘justified’ test of soundness, “the most appropriate strategy when considered against reasonable alternatives” needs to be explored. PPS12 expands on this further: ‘the ability to demonstrate that the plan is the most appropriate when considered against reasonable alternatives delivers confidence in the strategy. It requires the local planning authority to seek out and evaluate reasonable alternatives promoted by themselves and others to ensure that they bring forward those alternatives which they consider the LPA should evaluate as part of the plan making process. There is no point in inventing alternatives if they are not realistic. Being able to demonstrate that the plan is the most appropriate having gone through an objective process of assessing alternatives will pay dividends in terms of easier passage for the plan through the examination process. It will assist in evaluating the claims of those who wish to oppose the strategy.’ (PPS12, para 4.38 – PPS12’s own emphasis shown in italics)

2.3 In order to provide for a suitable strategy that strikes the right balance, WDC has prepared an extensive Evidence Base which identifies and assesses the various options available to WDC. These options are reviewed within the Background Papers (BP), in particular, BP1: Development of the Proposed Submission Core Strategy (section 5) and BP10: Sustainability Appraisal of Proposed Submission Core Strategy (Table 1.2). The Background Papers demonstrate the ‘appropriateness’ of the current proposed strategy, that ‘reasonable alternatives’ have been tested and that the Spatial Planning Objectives are found on ‘robust evidence’ i.e. the visions are ‘justified’ as required by PPS12. 2.4 The previous Spatial Development Options (June 2009) Consultation tested up to six different housing scenarios to accommodate the South East Plan (May 2009) housing target. In the light of the revocation of the RSS paragraphs 5.9 and 5.10 of BP1: Development of the Proposed Submission Core Strategy (section 5) and BP10: Sustainability Appraisal of Proposed Submission Core Strategy (Table 1.2). The Background Papers demonstrate the ‘appropriateness’ of the current proposed strategy, that ‘reasonable alternatives’ have been tested and that the Spatial Planning Objectives are found on ‘robust evidence’ i.e. the visions are ‘justified’ as required by PPS12. 2.5 Section 8 of BP1: Development of the Proposed Submission Core Strategy is supported by section 8 of BP10: Sustainability Appraisal of Proposed Submission Core Strategy which in turn supports the Spatial Planning Objectives within the Core Strategy. The Options tested are considered realistic and are not ‘artificial’ as set out in paragraph 38 of PINS ‘Learning From Experience’ (Sept 2009) document, which states, ‘in some instances it appears that options are identified for the sake of having options rather than because they are realistic….if the options are limited there is no point in trying to artificially create them’. 2.6 The Spatial Planning Objectives therefore provide a clear vision and are specific to the challenges of the District. They are supported by the Evidence Base which has a clear audit trail, has tested all the reasonable alternatives and is therefore ‘justified’. Furthermore, the Objectives are consistent with National Policy including ‘emerging’ National Guidance contained in the Localism Bill (i.e. the level of housing has been determined by a locally derived need).
dividends in terms of easier passage for the plan through the examination process. It will assist in evaluating the
claims of those who wish to oppose the strategy.’ (PPS12, para 4.38 – PPS12’s own emphasis shown in italics)
2.3 In order to provide for a suitable strategy that strikes the right balance, WDC has prepared an extensive
Evidence Base which identifies and assesses the various options available to WDC. These options are reviewed
within the Background Papers (BP), in particular, BP1: Development of the Proposed Submission Core Strategy
(section 5) and BP10: Sustainability Appraisal of Proposed Submission Core Strategy (Table 1.2). The
Background Papers demonstrate the ‘appropriateness’ of the current proposed strategy, that ‘reasonable
alternatives’ have been tested and that the Spatial Planning Objectives are found on ‘robust evidence’ i.e. the
visions are ‘justified’ as required by PPS12. 2.4 The previous Spatial Development Options (June 2009)
Consultation tested up to six different housing scenarios to accommodate the South East Plan (May 2009)
housing target. In the light of the revocation of the RSS paragraphs 5.9 and 5.10 of BP1: Development of the
Proposed Submission Core Strategy set out the steps which were addressed in determining the overall revised
quantum of growth and the suitability of the proposed locations to accommodate this growth: ‘The Local Strategic
Partnership focused upon meeting housing needs across the District, whilst Parish and Town Council’s within
Wealden provided information on local growth issues and preferences’. This is further explored in paragraphs 5.11
– 5.37 and Section 7 of BP1: Development of the Proposed Submission Core Strategy including an assessment of
the settlement hierarchy. 2.5 Section 8 of BP1: Development of the Proposed Submission Core Strategy is
supported by section 8 of BP10: Sustainability Appraisal of Proposed Submission Core Strategy which in turn
supports the Spatial Planning Objectives within the Core Strategy. The Options tested are considered realistic and
are not ‘artificial’ as set out in paragraph 38 of PINS ‘Learning From Experience’ (Sept 2009) document, which
states, ‘in some instances it appears that options are identified for the sake of having options rather than because
they are realistic….if the options are limited there is no point in trying to artificially create them’. 2.6 The Spatial
Planning Objectives therefore provide a clear vision and are specific to the challenges of the District. They are
supported by the Evidence Base which has a clear audit trail, has tested all the reasonable alternatives and is
therefore ‘justified’. Furthermore, the Objectives are consistent with National Policy including ‘emerging’ National
Guidance contained in the Localism Bill (i.e. the level of housing has been determined by a locally derived need).

Representation ID
1535
Person ID  Mrs Rudin
105986 Forest Row Parish Council
Agent ID
Box 14
Sound ☑ Yes ☐ No ☐ Justified ☐ Effective ☐ Consistent with national policy
Legally Compliant ☐ Yes ☐ No
Details of Reasons for Soundess/ Legal Compliance:
Support for the overarching objectives that contribute to the Vision. They are laudable and, we believe, achievable
in broad terms across the district.
Details of Changes to be Made:

Representation ID
267
Person ID  Mr Hurwood
134707 CPRE Sussex, Wealden South Group
Agent ID
Box 15
Sound ☐ Yes ☐ No ☐ Justified ☐ Effective ☐ Consistent with national policy
Legally Compliant ☐ Yes ☐ No
Details of Reasons for Soundess/ Legal Compliance:
Details of Changes to be Made:
SPO14 The need for parking of "work related" vans near to rural developments needs to be considered, It is
suggested that where high densities are proposed,real practical parking needs are included, particularly in rural
areas.
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<td>518363</td>
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**Details of Reasons for Soundess/ Legal Complaince:**

I leave the planning inspector to decide whether WDC have presented a sound and justifiable case for it's virtual reliance on Greenfield to meet it's housing targets from 2016 to 2030.

**Details of Changes to be Made:**

The recognition that re-use of Bownfield is important is acknowledged by this document. However the devil is in the detail. The supporting background paper, Managing the Delivery of Housing, includes at 10.4, and labelled Figure 2 a housing trajectory. This bar chart shows projected completions for the plan period. What is deeply worrying is that it also shows that: between 2012 and 2015 completion on green field sites exceeds brown field, between 2016 and 2018 brown field site completions are insignificant and that FROM 2020 - ALL COMPLETIONS ARE ON GREEN FIELD SITES.

**Details of Reasons for Soundess/ Legal Complaince:**

We support Spatial Planning Objectives SPO14 in relation to the use and preference for previously developed land in accordance with national policy contained within PPS 3: Housing, in particular paragraphs 10 and 40, both of which encourage Local Planning Authorities to make efficient use of land by re-using previously developed land. The importance of the continued use of previously developed land is outlined in PPS1: Delivering Sustainable Development. Paragraph 21 states that in order to utilise resources in an efficient and sustainable way "The broad aim should be to ensure that outputs are maximised whilst resources used are." Criteria (viii) of paragraph 27 further states that in preparing development plans, planning authorities should seek to "Promote the more efficient use of land through higher density, mixed use development and the use of suitably located previously developed land and buildings. Planning should seek actively to bring vacant and underused previously developed land and buildings back into beneficial use to achieve the targets the Government has set for development on previously developed land." The redevelopment of the Former Merrydown Cider site within the Local Service Centre of Horam as a mixed use scheme will assist the Authority in meeting both the objectives in national planning policy and SPO14 in that it can deliver at least 70% of Horam's housing requirement (100 units), as outlined in representations to Strategic Policy WCS6 - Rural Area Strategy, on Brownfield land.

**Details of Changes to be Made:**
Details of Reasons for Soundess/ Legal Complaince:

New development should not mimic past development. This proposed strategic objective states that housing density should be compatible with a particular location. Whilst this is expressed as an objective, this could be unduly prescriptive when some sites have the capacity to be able to accommodate higher building densities than, for example, indicated within the Council’s SHLAA.

Details of Changes to be Made:

Amend wording so that the objective states that housing densities will be compatible with the need to make efficient use of land and with the particular location.
2.2 To meet the ‘justified’ test of soundness, “the most appropriate strategy when considered against reasonable alternatives” needs to be explored. PPS12 expands on this further: ‘the ability to demonstrate that the plan is the most appropriate when considered against reasonable alternatives delivers confidence in the strategy. It requires the local planning authority to seek out and evaluate reasonable alternatives promoted by themselves and others to ensure that they bring forward those alternatives which they consider the LPA should evaluate as part of the plan making process. There is no point in inventing alternatives if they are not realistic. Being able to demonstrate that the plan is the most appropriate having gone through an objective process of assessing alternatives will pay dividends in terms of easier passage for the plan through the examination process. It will assist in evaluating the claims of those who wish to oppose the strategy.’ (PPS12, para 4.38 – PPS12’s own emphasis shown in italics)

2.3 In order to provide for a suitable strategy that strikes the right balance, WDC has prepared an extensive Evidence Base which identifies and assesses the various options available to WDC. These options are reviewed within the Background Papers (BP), in particular, BP1: Development of the Proposed Submission Core Strategy (section 5) and BP10: Sustainability Appraisal of Proposed Submission Core Strategy (Table 1.2). The Background Papers demonstrate the ‘appropriateness’ of the current proposed strategy, that ‘reasonable alternatives’ have been tested and that the Spatial Planning Objectives are found on ‘robust evidence’ i.e. the visions are ‘justified’ as required by PPS12. 2.4 The previous Spatial Development Options (June 2009) Consultation tested up to six different housing scenarios to accommodate the South East Plan (May 2009) housing target. In the light of the revocation of the RSS paragraphs 5.9 and 5.10 of BP1: Development of the Proposed Submission Core Strategy set out the steps which were addressed in determining the overall revised quantum of growth and the suitability of the proposed locations to accommodate this growth: ‘The Local Strategic Partnership focused upon meeting housing needs across the District, whilst Parish and Town Council’s within Wealden provided information on local growth issues and preferences’. This is further explored in paragraphs 5.11 – 5.37 and Section 7 of BP1: Development of the Proposed Submission Core Strategy including an assessment of the settlement hierarchy. 2.5 Section 8 of BP1: Development of the Proposed Submission Core Strategy is supported by section 8 of BP10: Sustainability Appraisal of Proposed Submission Core Strategy which in turn supports the Spatial Planning Objectives within the Core Strategy. The Options tested are considered realistic and are not ‘artificial’ as set out in paragraph 38 of PINS ‘Learning From Experience’ (Sept 2009) document, which states, ‘in some instances it appears that options are identified for the sake of having options rather than because they are realistic….if the options are limited there is no point in trying to artificially create them’. 2.6 The Spatial Planning Objectives therefore provide a clear vision and are specific to the challenges of the District. They are supported by the Evidence Base which has a clear audit trail, has tested all the reasonable alternatives and is therefore ‘justified’. Furthermore, the Objectives are consistent with National Policy including ‘emerging’ National Guidance contained in the Localism Bill (i.e. the level of housing has been determined by a locally derived need).

Details of Changes to be Made:
Vision and Spatial Planning Objectives - Support 2.1 We support the WDC’s Spatial Planning Objectives (SPO1 – SP15). We consider the Objectives promote sustainable growth and strike an appropriate balance to accommodate that growth given the environmental and infrastructure requirements of the District. The Objectives will support Wealden’s aspiration to retain its rural character and high quality environment whilst achieving sufficient growth to support its economy, regenerate market towns and tackle deprivation. 2.2 To meet the ‘justified’ test of soundness, “the most appropriate strategy when considered against reasonable alternatives” needs to be explored. PPS12 expands on this further: ‘the ability to demonstrate that the plan is the most appropriate when considered against reasonable alternatives delivers confidence in the strategy. It requires the local planning authority to seek out and evaluate reasonable alternatives promoted by themselves and others to ensure that they bring forward those alternatives which they consider the LPA should evaluate as part of the plan making process. There is no point in inventing alternatives if they are not realistic. Being able to demonstrate that the plan is the most appropriate having gone through an objective process of assessing alternatives will pay
Summary of all Representations - Proposed Submission Core Strategy Regulation 27 - Report 11th July 2011

dividends in terms of easier passage for the plan through the examination process. It will assist in evaluating the claims of those who wish to oppose the strategy.’ (PPS12, para 4.38 – PPS12’s own emphasis shown in italics)

2.3 In order to provide for a suitable strategy that strikes the right balance, WDC has prepared an extensive Evidence Base which identifies and assesses the various options available to WDC. These options are reviewed within the Background Papers (BP), in particular, BP1: Development of the Proposed Submission Core Strategy (section 5) and BP10: Sustainability Appraisal of Proposed Submission Core Strategy (Table 1.2). The Background Papers demonstrate the ‘appropriateness’ of the current proposed strategy, that ‘reasonable alternatives’ have been tested and that the Spatial Planning Objectives are found on ‘robust evidence’ i.e. the visions are ‘justified’ as required by PPS12. 2.4 The previous Spatial Development Options (June 2009) Consultation tested up to six different housing scenarios to accommodate the South East Plan (May 2009) housing target. In the light of the revocation of the RSS paragraphs 5.9 and 5.10 of BP1: Development of the Proposed Submission Core Strategy set out the steps which were addressed in determining the overall revised quantum of growth and the suitability of the proposed locations to accommodate this growth: ‘The Local Strategic Partnership focused upon meeting housing needs across the District, whilst Parish and Town Council’s within Wealden provided information on local growth issues and preferences’. This is further explored in paragraphs 5.11 – 5.37 and Section 7 of BP1: Development of the Proposed Submission Core Strategy including an assessment of the settlement hierarchy. 2.5 Section 8 of BP1: Development of the Proposed Submission Core Strategy is supported by section 8 of BP10: Sustainability Appraisal of Proposed Submission Core Strategy which in turn supports the Spatial Planning Objectives within the Core Strategy. The Options tested are considered realistic and are not ‘artificial’ as set out in paragraph 38 of PINS ‘Learning From Experience’ (Sept 2009) document, which states, ‘in some instances it appears that options are identified for the sake of having options rather than because they are realistic…if the options are limited there is no point in trying to artificially create them’. 2.6 The Spatial Planning Objectives therefore provide a clear vision and are specific to the challenges of the District. They are supported by the Evidence Base which has a clear audit trail and specific to the challenges of the District. They are therefore ‘justified’. Furthermore, the Objectives are consistent with National Policy including ‘emerging’ National Guidance contained in the Localism Bill (i.e. the level of housing has been determined by a locally derived need).

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<tr>
<td>1325</td>
<td>Mr Ankers</td>
<td>South Downs Society</td>
</tr>
<tr>
<td>106660</td>
<td></td>
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<tr>
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</tr>
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Details of Reasons for Soundess/ Legal Complaince:
We generally support all 15 of the Spatial objectives but SPO1 (countryside and rural areas) should make specific mention of the downs.

Details of Changes to be Made:

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<tr>
<td>1427</td>
<td>Ms Mears</td>
<td>Environment Agency</td>
</tr>
<tr>
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<tr>
<td>Legally Compliant</td>
<td>☐ Yes</td>
<td>☐ No</td>
</tr>
</tbody>
</table>

Details of Reasons for Soundess/ Legal Complaince:
We are pleased that your Strategy promotes the redevelopment of brownfield land, improvement of groundwater quality and the identification of vulnerable groundwater areas and an assessment of groundwater flood risk. While we would prefer to see the Core Strategy seeking to protect and enhance groundwater resources to achieve Good Status according to WFD, we consider that this issue could be dealt with through your Site Allocations DPD, as you commit to in Paragraph 7.22.

Details of Changes to be Made:
**Representation ID**

1536

**Person ID**  Mrs Rudin  Agent ID

105986  Forest Row Parish Council

**Agent ID**

Box 15

**Sound**  Yes

**Legally Compliant**  Yes  No

**Details of Reasons for Soundness/ Legal Complaince:**

Support for the overarching objectives that contribute to the Vision. They are laudable and, we believe, achievable in broad terms across the district.

**Details of Changes to be Made:**

Yes

Sound

No

Justified

Effective

Consistent with national policy

---

**Representation ID**

471

**Person ID**  Mr Phillips  Agent ID

104870  Campaign for Better Transport

**Agent ID**

Box 15

**Sound**  No

**Legally Compliant**  Yes  No

**Details of Reasons for Soundness/ Legal Complaince:**

‘Suitable parking provision’ to support retailing and other business is ambiguous. There is clear concern of traffic impact on Ashdown Forest (3.32), parking issues at Polegate station (6.25) and limited supply of brownfield development opportunity (5.8). Policies rightly aspire to cut traffic, combat climate change, avoid flood risk areas, improve safety and maximise use of previously developed land. Parking is a key element in making these effective

**Details of Changes to be Made:**

‘Suitable parking provision’ should clearly avoid being ‘excessive’, in pursuit of these policies. A significant quantity of current parking space should be available for brownfield redevelopment. Car free developments should be encouraged and supported.

---

**Representation ID**

399

**Person ID**  Mr Wadman  Agent ID

335824  Mr Ide

**Agent ID**

335759  Batcheller Monkhouse

**Agent ID**

Box 15

**Sound**  Yes  No

**Legally Compliant**  Yes  No

**Details of Reasons for Soundness/ Legal Complaince:**

New development should not mimic past development. This proposed strategic objective states that housing density should be compatible with a particular location. Whilst this is expressed as an objective, this could be unduly prescriptive when some sites have the capacity to be able to accommodate higher building densities than, for example, indicated within the Council’s SHLAA. Proposed Change

**Details of Changes to be Made:**

Amend wording so that the objective states that housing densities will be compatible with the need to make efficient use of land and with the particular location.
Summary of all Representations - Proposed Submission Core Strategy Regulation 27 - Report 11th July 2011

Representation ID
418

Person ID  Mr  Ide  Agent ID  Mr  Ide
521977  Batcheller Monkhouse  335759  Batcheller Monkhouse

Box 15

Sound  ☐ Yes  ☑ No  ☑ Justified  ☐ Effective  ☐ Consistent with national policy

Legally Compliant  ☑ Yes  ☐ No

Details of Reasons for Soundess/ Legal Complaince:
New development should not mimic past development. This proposed strategic objective states that housing density should be compatible with a particular location. Whilst this is expressed as an objective, this could be unduly prescriptive when some sites have the capacity to be able to accommodate higher building densities than, for example, indicated within the Council’s SHLAA. Proposed Change

Details of Changes to be Made:
Amend wording so that the objective states that housing densities will be compatible with the need to make efficient use of land and with the particular location.

Representation ID
390

Person ID  Mr  Eddison  Agent ID  Mr  Ide
521943  Batcheller Monkhouse  335759  Batcheller Monkhouse

Box 15

Sound  ☐ Yes  ☑ No  ☑ Justified  ☐ Effective  ☐ Consistent with national policy

Legally Compliant  ☑ Yes  ☐ No

Details of Reasons for Soundess/ Legal Complaince:
New development should not mimic past development. This proposed strategic objective states that housing density should be compatible with a particular location. Whilst this is expressed as an objective, this could be unduly prescriptive when some sites have the capacity to be able to accommodate higher building densities than, for example, indicated within the Council’s SHLAA. Proposed Change

Details of Changes to be Made:
Amend wording so that the objective states that housing densities will be compatible with the need to make efficient use of land and with the particular location.

Representation ID
363

Person ID  Mr  Burrough  Agent ID  Mr  Ide
521930  Batcheller Monkhouse  335759  Batcheller Monkhouse

Box 15

Sound  ☐ Yes  ☑ No  ☑ Justified  ☐ Effective  ☐ Consistent with national policy

Legally Compliant  ☑ Yes  ☐ No

Details of Reasons for Soundess/ Legal Complaince:
New development should not mimic past development. This proposed strategic objective states that housing density should be compatible with a particular location. Whilst this is expressed as an objective, this could be unduly prescriptive when some sites have the capacity to be able to accommodate higher building densities than, for example, indicated within the Council’s SHLAA. Proposed Change

Details of Changes to be Made:
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<td>677</td>
<td>Mr Allan</td>
<td>103494</td>
<td>Additional medical, shopping and employment will be needed in this area if development goes ahead.</td>
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<td>1326</td>
<td>Mr Ankers</td>
<td>106660</td>
<td>We generally support all 15 of the Spatial objectives but SPO1 (countryside and rural areas) should make specific mention of the downs.</td>
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Vision and Spatial Planning Objectives - Support 2.1 We support the WDC’s Spatial Planning Objectives (SPO1 – SP15). We consider the Objectives promote sustainable growth and strike an appropriate balance to accommodate that growth given the environmental and infrastructure requirements of the District. The Objectives will support Wealden’s aspiration to retain its rural character and high quality environment whilst achieving sufficient growth to support its economy, regenerate market towns and tackle deprivation. 2.2 To meet the ‘justified’ test of soundness, “the most appropriate strategy when considered against reasonable alternatives” needs to be explored. PPS12 expands on this further: ‘the ability to demonstrate that the plan is the most appropriate when considered against reasonable alternatives delivers confidence in the strategy. It requires the local planning authority to seek out and evaluate reasonable alternatives promoted by themselves and others to ensure that they bring forward those alternatives which they consider the LPA should evaluate as part of the plan making process. There is no point in inventing alternatives if they are not realistic. Being able to demonstrate that the plan is the most appropriate having gone through an objective process of assessing alternatives will pay dividends in terms of easier passage for the plan through the examination process. It will assist in evaluating the claims of those who wish to oppose the strategy.’ (PPS12, para 4.38 – PPS12’s own emphasis shown in italics)

2.3 In order to provide for a suitable strategy that strikes the right balance, WDC has prepared an extensive Evidence Base which identifies and assesses the various options available to WDC. These options are reviewed within the Background Papers (BP), in particular, BP1: Development of the Proposed Submission Core Strategy (section 5) and BP10: Sustainability Appraisal of Proposed Submission Core Strategy (Table 1.2). The Background Papers demonstrate the ‘appropriateness’ of the current proposed strategy, that ‘reasonable alternatives’ have been tested and that the Spatial Planning Objectives are found on ‘robust evidence’ i.e. the visions are ‘justified’ as required by PPS12. 2.4 The previous Spatial Development Options (June 2009) Consultation tested up to six different housing scenarios to accommodate the South East Plan (May 2009) housing target. In the light of the revocation of the RSS paragraphs 5.9 and 5.10 of BP1: Development of the Proposed Submission Core Strategy set out the steps which were addressed in determining the overall revised quantum of growth and the suitability of the proposed locations to accommodate this growth: ‘The Local Strategic Partnership focused upon meeting housing needs across the District, whilst Parish and Town Council’s within Wealden provided information on local growth issues and preferences’. This is further explored in paragraphs 5.11 – 5.37 and Section 7 of BP1: Development of the Proposed Submission Core Strategy including an assessment of the settlement hierarchy. 2.5 Section 8 of BP1: Development of the Proposed Submission Core Strategy is supported by section 8 of BP10: Sustainability Appraisal of Proposed Submission Core Strategy which in turn supports the Spatial Planning Objectives within the Core Strategy. The Options tested are considered realistic and are not ‘artificial’ as set out in paragraph 38 of PINS ‘Learning From Experience’ (Sept 2009) document, which states, ‘in some instances it appears that options are identified for the sake of having options rather than because they are realistic.…if the options are limited there is no point in trying to artificially create them’. 2.6 The Spatial Planning Objectives therefore provide a clear vision and are specific to the challenges of the District. They are supported by the Evidence Base which has a clear audit trail, has tested all the reasonable alternatives and is therefore ‘justified’. Furthermore, the Objectives are consistent with National Policy including ‘emerging’ National Guidance contained in the Localism Bill (i.e. the level of housing has been determined by a locally derived need).
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<td>105986</td>
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<td>Forest Row Parish Council</td>
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Details of Reasons for Soundness/ Legal Compliance:
Support for the overarching objectives that contribute to the Vision. They are laudable and, we believe, achievable in broad terms across the district.

Details of Changes to Be Made:

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<td>367</td>
<td>521906</td>
<td>Box 16</td>
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<tr>
<td>Mrs McKeown</td>
<td>Hallam Land Management Limited</td>
<td></td>
</tr>
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<td>Sound</td>
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<td>Legally Compliant</td>
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Details of Reasons for Soundness/ Legal Compliance:
Hallam Land Management (HLM) support SP015 and propose that any requirement for phasing can be adequately addressed through the development control process. HLM maintain that there is no justification to include a phasing policy (WSC5) within this plan.

Details of Changes to Be Made:
Details of Reasons for Soundness/ Legal Compliance:
This policy should refer to the creation of a Community Infrastructure Levy (or CIL) to far more effectively deal with the identified infrastructure constraints within the District. The absence of such a mechanism will make the identification and resolution of common infrastructure constraints less effective, more costly in terms of delays and financial burdens, increased pressure on resources for both the Council and the construction industry and less certainty within the local community.

Details of Changes to be Made:
The Core Strategy should establish a Community Infrastructure (or CIL) mechanism and this policy should refer to it.
1. The Core Strategy is not legally compliant and is unsound because of its proposals for an urban extension to the north west of Heathfield (Strategic Development Area SD11). 2. Whilst the principle of accommodating housing growth in the broad location of north west Heathfield is supported, the Core Strategy's proposals are deficient because they: (a) fail to take a comprehensive approach to the development of this area and so are not founded on a robust and credible evidence base and are not the most appropriate strategy when considered against the reasonable alternatives in this location, thus failing the soundness test in paragraph 4.36 of PPS12 that they are “justifiable”. (b) constitute an unjustified encroachment into the High Weald AONB and so are not the most appropriate strategy when considered against the reasonable alternatives in this location, thus failing the same “justifiable” test in PPS12 and also the soundness test in paragraph 4.52 of PPS12 that they are “consistent with national policy”. Paragraph 16(v) of PPS7 requires the Council in preparing the Core Strategy to “conserve…sites of landscape…value, in accordance with statutory designations”. Paragraph 22(ii) of PPS7 requires that “major developments” should only take place within the AONB after “the most rigorous examination” and an assessment of “the scope for developing elsewhere outside the designated area or meeting the need for it in some other way”. The Council has failed to properly assess the scope for meeting the need for development on previously developed land at north west Heathfield that is not in the AONB. (c) utilise less accessible and less sustainable land and so are not the most appropriate strategy when considered against reasonable alternatives in this location, thus failing the same “justifiable” test in PPS12. (d) fail to provide adequate safeguarding of amenities of existing dwellings (if those dwellings are to be excluded from the urban extension as currently proposed) and fail to integrate into the existing urban form, thus failing the soundness test in paragraph 4.52 of PPS12 that the proposals are consistent with national policy. Paragraph 34 of PPS1 and paragraph 13 of PPS3 require the Council to reject design which is “inappropriate in its context” and paragraph 35 of PPS1 requires development to be designed so that it will be “integrated into the existing urban form and the natural and built environments”. THE PROPOSED SUBMISSION CORE STRATEGY 3. We object to the following parts of the Core Strategy. Because the objections are interconnected, we have set out all the relevant matters in this response, although this particular objection only relates to the specific part of the Core Strategy identified in our response to Q1 above. Our objections are as follows: (i) The omission from Spatial Planning Objective SPO1 of any reference to minimising the loss of nationally designated landscapes, including the High Weald AONB. Paragraph 16(v) of PPS7 requires the Council to conserve the AONB and since it is clear that the Council is proposing to meet part of the District’s development needs by using land within the AONB, the Council should establish a clear objective that only the minimum AONB land should be used for this purpose and wherever possible non-AONB land should be used in preference. (ii) The reference in Policy WCS2 to the broad locations for housing development being shown as insets on the Key Diagram. We object to the inset for Heathfield in relation to the way it shows the proposal SD11 and consequently object to this reference to that inset plan in Policy WCS2. (iii) The reference in Policy WCS4 to SD11: Land at North West of Heathfield. We object to the way that SD11 is described in Chapter 6 of the Core Strategy and shown on the Key Diagram and as a result object to the reference to SD11 in Policy WCS4. (iv) The omission from paragraph 5.8 of any aim to maximise the use of previously developed land in meeting existing and future housing needs. Notwithstanding the recent changes to PPS3 it remains a national objective to prioritise the use of previously developed land, in accordance with paragraph 21 of PPS1 and paragraph 40 of PPS3. (v) The reference in paragraph 6.40 to the identification of potential sites for housing “through the SHLAA”. We object to the inclusion of Site 155/1210 in its current form as shown in the SHLAA and consequently object to this reference to that site in paragraph 6.40. (vi) The reference in paragraph 6.41 to the “most suitable location” being “within the AONB” and that this land could be developed “without strategic adverse impact on the landscape”. The Council’s evidence base does not demonstrate that the land within the AONB is more suitable for development than the non-AONB previously developed land on High Street. There is no assessment by the Council of the suitability of this non-AONB land (which includes the objector’s land at Lavender Cottage, High Street, Heathfield, TN21 0UP) and yet it is more suitable than the AONB land, being (i) not subject to a national landscape designation, (ii) previously developed land, (iii) within the existing settlement boundary, and (iv) well related and integrated into the urban area and existing transport connections. In addition, the Council’s evidence base does not show that 160 dwellings can be provided in the AONB without strategic adverse impact on the landscape. The capacity of 160 dwellings for SD11 would appear to derive from the assumed capacity of 2 adjacent SHLAA sites at north west Heathfield (Site 155/1210 with a capacity of 123 dwellings at 40 dph and Site 307/1210 with a capacity of 35 dwellings at 35 dph). The Council’s Landscape Character Assessment (February 2009) shows at Figure 5 that large parts of these
Summary of all Representations - Proposed Submission Core Strategy Regulation 27 - Report 11th July 2011

SHLAA sites are required to be retained as open space to provide a “landscape buffer” to Tilsmore Wood. If those buffers are to be provided as recommended in the Landscape Character Assessment, the SHLAA sites will not be able to deliver the required capacity, without radical changes to the assumed density, and there has been no assessment of the impact of higher density development on the AONB and on the landscape setting and character of Tilsmore Wood. The claim therefore that SD11 can be achieved without strategic adverse impact on the AONB is not supported by the evidence base. (vii) The reference in paragraph 6.41 to the release of AONB land being justified “as no suitable alternative non-AONB location exists”. The Council’s evidence base does not substantiate this assertion. The Council has not assessed the suitability of the non-AONB land in this location which fronts High Street (including the objectors’ land at Lavender Cottage). This non-AONB land is within the settlement limits of Heathfield as identified on the Proposals Map of the saved Local Plan and paragraph 6.48 of the Core Strategy confirms that within development boundaries “the principle of development is acceptable”. The principle of redeveloping this land to provide more intensive residential development has already been accepted by the Council, with the grant of planning permissions at Brackenside (WD/08/0329) for 3 dwellings in place of 1 dwelling, and at Oaksdown/Lowlands (WD/2011/0400) for 9 apartments in the place of 2 dwellings. The more intensive development of the non-AONB land on the High Street frontage would minimise (or may even remove) the need for the use of AONB land. This option would plainly be a more suitable alternative than the use only of land “within the AONB” as proposed in the Core Strategy. (viii) The reference in paragraph 6.41 to “no suitable alternative contingency land is available”. The land at Oaksdown/Lowlands is available for development (as confirmed by the recent renewal of planning permission). The objectors’ land at Lavender Cottage is available for development (and this has been made known to the Council since at least August 2010). The land at Woodhatch is relied on as being available for development in order to provide the access for SHLAA site 155/1210. The objectors understand that the land at Holmhurst could be made available for development. Thus, there is a continuous frontage of 5 plots of non-AONB land available (all with generous areas of garden land, most of which is excluded from the AONB) just on this part of the High Street. Were the Council to actively promote a comprehensive redevelopment of this area it is likely that other land in the vicinity would be made available. However, the Council has simply failed in its evidence base to assess this option. If it is necessary to identify contingency land then the hinterland of AONB land should be identified as contingency land, with priority being given to the development of the non-AONB land on the High Street frontage. Prioritising that land would be consistent with the policy objectives of minimising the loss of AONB land and maximising the use of previously developed land. (ix) The reference in paragraph 6.42 item 3 to SD11 being “on land adjacent to the urban area”. The proposal for SD11 should not be defined in a way which excludes the urban area and which focuses only on land within the AONB. The proposal should embrace the urban area and the development should maximise the use of previously developed land in the urban area to achieve the provision of 160 dwellings before any consideration is given to the use of land in the AONB. (x) Figure 10 Heathfield Area Strategy. This diagram shows SD11 as located within the AONB and beyond the existing settlement. The diagram should not exclude the inclusion of the existing built up area in this location within the scope of SD11. The built up area has the potential and the capacity to be redeveloped and this aim should be the first priority at north west Heathfield. (xi) Key Diagram: the inset for Heathfield. The inset shows Heathfield and Proposal SD11 in the same way that they are shown on Figure 10 and they are not acceptable for the same reason set out at (x) above. 4. We now propose to elaborate on these objections. Piecemeal not comprehensive 5. SD11 takes an opportunistic approach. It utilises substantial areas of greenfield land as the main development areas (and by implication from the SHLAA one existing property simply as a means of access). Although the SHLAA indicates that Site 155/1210 is in multiple ownerships and Site 307/1210 is owned by a company with 7 shareholders, the choice of this location seems to be influenced simply by the fact that these 2 sites were promoted in the SHLAA and so it is assumed they are available. Site 155/1210 is said to be under the control of a housing developer. We are not aware whether the Council has seen the terms of any option or other legal agreement giving such control but, given that the Proposed Submission Core Strategy is a long term strategy to 2030 and its trajectory does not anticipate the site coming forward before 2015/16, little weight can be given to the status of any current contractual arrangements. 6. Any sensible spatial planning approach to the development of this area would not look at the sites promoted in the SHLAA in isolation but would look to see how that development would relate to its local context and how it would relate to the settlement it is intended to form a part of. 7. The site of SD11 is on sloping ground set back behind existing development which separates the site from the rest of Heathfield. Development as proposed will not integrate the development with its local context as required by paragraph 35 of PPS1. Nor will it maximise the opportunities for the site to benefit from clear and easy links to the facilities in the local service centre by non-car modes. 8. A comprehensive approach would look at the whole of the area in this north western part of Heathfield and then seek to identify the land which is most suited to development. It is common sense that this would start by looking at the land with the best links by foot, cycle, and public transport to the rest of the settlement. That is of course the frontage land along Heathfield Road/High Street itself. The frontage land also contains the previously developed land comprising the existing dwellings and their various outbuildings. Whilst the recent revisions to PPS3 have removed garden land from the definition of previously developed land, the footprint of the buildings and their associated driveways and hardstandings clearly have a higher priority for development than a greenfield meadow. 9. The present objectors, as the owners of Lavender Cottage, are willing to make their land available as part of a wider development. The objectors have made this known to the Council since at least August 2010. The principle of redevelopment for more intensive residential development has already been established on land to the wets (WD/08/0329) and on the adjoining site.
to the east of Lavender Cottage (WD/2011/0400). Although planning permission was granted for a block of flats (WD/2008/0276), that development has not come forward and the permission has recently had to be renewed. Clearly, the land is available for development, even if the form of development is not at present attractive to the market. We understand that the owner of the adjoining plot at Holmhurst would be prepared to make that site available. Woodhatch is relied on as available in the SHLAA (Site 155/1210 refers). Thus there is already a substantial amount of the frontage land which is available for development. A spatial approach to the planning of this area would look to utilise this developed frontage land, which plainly has development potential, before turning to the undeveloped hinterland to the rear. Unjustified Encroachment into the AONB 10. The Proposed Submission Core Strategy recognises that SD11 lies within the AONB, where there is strict control over new development. Paragraph 22 of PPS7 is clear that major development in the AONB requires “the most rigorous examination” and that such development should only be accepted after assessment of the scope for meeting the need elsewhere. Under the GDMO 2010 “major development” is a development of 10 or more dwellings. Under the Secretary of State’s arrangements for the recovery of appeals on the basis that they are large/controversial, the threshold is 150 residential units. On either basis, a development of 160 dwellings is major development. In any event, the Council has accepted in the SHLAA that “there is a requirement to demonstrate development is essential to meet local needs and that other more suitable sites do not exist elsewhere” (Site 155/1210). The claimed rationale for the use of AONB land in this case is that “no suitable alternative non-AONB location exists”. This is patently incorrect. As already noted, the frontage land is not within the AONB and if the desire is to achieve a development of some 160 dwellings there can be no justification for taking more AONB land than is absolutely necessary when there is non-AONB land in the same location which is available. 11. Whilst it may be doubtful that the frontage land which is known to be available could alone accommodate the full scale of the development sought, the need to encroach into the AONB would be very much reduced if the frontage land was used first. Such an approach would also enable the lower (and least accessible) parts of the meadow to be retained as open land, potentially providing a better buffer with the important woodland at Tilsmore Wood that makes up such a key component of the Wealden character. The need for such a buffer is recognised in the Landscape Character Assessment (Figure 5). In addition, if the Council made it clear that it was promoting the comprehensive development of the area, it is likely that other owners would also wish to make their land available, and the Council may therefore be able to avoid encroaching into the AONB to any material degree. 12. The Council’s claim that 160 dwellings can be provided in the AONB without strategic adverse impact on the landscape is not supported by the evidence base. The capacity of 160 dwellings for SD11 would appear to derive from the assumed capacity of the 2 adjacent SHLAA sites:Site 155/1210 and Site 307/1210. As already noted, the Council’s Landscape Character Assessment shows (Figure 5) that large parts of these SHLAA sites are required to be retained as open space to provide a “landscape buffer” to Tilsmore Wood. If those buffers are to be provided as recommended in the Landscape Character Assessment, the SHLAA sites will not be able to deliver the required capacity, without radical changes to the assumed density, and there has been no assessment of the impact of higher density development on the AONB and on the landscape setting and character of Tilsmore Wood. The claim therefore that SD11 can be achieved without strategic adverse impact on the AONB is not supported by the evidence base. Using Less Accessible and Less Sustainable Land 13. Similar considerations in terms of minimising the amount of AONB land apply in relation to accessibility issues. The lower parts of the sloping meadow land are not only more remote by simple distance from the footways and bus route along Heathfield Road/High Street, there is also the fact that journeys from home will inevitably be uphill for residents of that area. There will therefore be a disinclination to use non-car modes for accessing local services, even if they might appear to be within walking distance. It must also be doubted whether much of the hinterland is within the preferred 400m distance for access to a bus route. 14. Again, on any sensible measure of accessibility and sustainability, it cannot make sense to use the more remote hinterland in preference to the frontage land. PPS1 is clear at paragraph 35 that new development needs to be integrated into the urban area and address connectivity issues. The choice of a backland location for SD11 when the more accessible frontage land is available is directly contrary to this guidance Inadequate safeguarding of amenities 16. We have already explained why a comprehensive approach needs to be taken to this area. However, if the Council persists in its piecemeal approach then it is apparent that inadequate consideration has been given to the relationship between the retained frontage properties and the new development to the rear. The existing development is at a very low density and has the established character of a mature residential area, with individual dwellings in spacious plots. 17. The SHLAA indicates a proposed density for the new development of some 40 dwellings per hectare for Site 155/120. This will be substantially different in character and could only be achieved by ensuring a substantial buffer between the 2 very different forms of development. However, this would push the new development further into the AONB and would further separate the new development from the settlement of which it is intended to form a part. Again, there would be a conflict with the advice in PPS1 on integrating the development with the urban area. Soundness Tests 18. It is clear from the objections set out above that the proposals for SD11 are not founded on a robust and credible evidence base, cannot be shown to be the most appropriate strategy when considered against the reasonable alternatives, and are not consistent with national policy in PPS1, PPS3, and PPS7 in several important respects. They therefore fail 2 of the key tests of soundness as set out at paragraph 4.52 of PPS12. Legal Tests 19. These objections also have the consequence that the Council’s failure to properly consider reasonable alternatives to its proposals at
north west Heathfield, and in particular to consider the alternative of an area of growth in this location planned on a comprehensive basis and focused on maximising the use of previously developed land and minimising the use of land within the AONB, has the consequence that the Sustainability Appraisal/Strategic Environmental Assessment that accompanies the Core Strategy is legally deficient and the Core Strategy is consequently not legally compliant with the requirements of either Regulation 5(1) of the Environmental Assessment of Plans and Programmes Regulations 2004 or with the requirements of s.19(5) and s.20(2) Planning & Compulsory Purchase Act 2004. In addition, the same failings, together with the lack of a credible and robust evidence base to support those proposals and the conflicts with national policy mean that the Core Strategy is not “sound” as required by s.20(5)(b) PCPA 2004. 20. The SA/SEA considers, in broad terms, alternative locations for growth at Heathfield as between the north east, north west, and west of the town. However, what it fails to do is to look at reasonable alternatives within the selected north west location. It is no answer for the Council to suggest that this level of detail is a matter for a later DPD because the Core Strategy is already spatially specific that the location of north west Heathfield is an “urban extension” (i.e. an addition) and that it is “within the AONB” (i.e. outside the settlement boundary. The same spatial approach is shown on Figure 10 and on the Inset for the Key Diagram. The Council is not, therefore, able to avoid grappling with the spatial implications of this choice as part of the Core Strategy and testing it against reasonable alternatives. However, it is clear that this is not an exercise that has been attempted in the SA/SEA. 21. The Council will be well aware from the recent decision in Save Historic Newmarket Ltd v Forest Heath District Council [2011] EWHC 606 (Admin) that a failure in the SA/SEA to give proper consideration to identification and assessment of reasonable alternatives is likely to result in a quashing of the relevant parts of the Core Strategy. Conclusion 22. For all of these reasons the objectors strongly suggest that neither the Council nor the Inspector should endorse the present proposals for SD11. What is required is a fundamental rethink to achieve an integrated, sustainable and accessible development which minimises the impact on the AONB and provides a comprehensive spatial approach to the development of this area. Essentially this requires the focus to shift from the “easy target” of greenfield meadows to a more considered approach, giving priority to the previously developed frontage land, and only considering the AONB hinterland to the minimum extent necessary to achieve the required dwelling numbers.

Details of Changes to be Made:
Add to SPO1 the words “We will minimise the loss of, or impact on, nationally designated landscapes, including the High Weald AONB, to the fullest extent possible in meeting the needs of the plan area”.

<table>
<thead>
<tr>
<th>Representation ID</th>
<th>Person ID</th>
<th>Agent ID</th>
<th>Details of Reasons for Soundess/ Legal Compliance:</th>
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<tbody>
<tr>
<td>262</td>
<td>Mr Hurwood</td>
<td>CPRE Sussex, Wealden South Group</td>
<td>I do not have sufficient knowledge to comment on the legal situation. The strategy appears to be generally sound, but we wish to make a number of comments and suggestions.</td>
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<tr>
<td>134707</td>
<td></td>
<td>Box 2</td>
<td>Details of Changes to be Made:</td>
</tr>
<tr>
<td></td>
<td>Yes</td>
<td>No</td>
<td>SPO1 should be strengthened by including an intention to protect the setting of these designated areas and sites, the local environment should be protected in the areas around their boundaries.</td>
</tr>
</tbody>
</table>
Details of Reasons for Soundess/ Legal Complaince:
Natural England commends the Council on its recognition of the importance of the environment and green infrastructure and the need to provide resilience for climate change. We particularly support spatial planning objectives SP01, SP07, SP09 and SP011.

Details of Changes to be Made:

Details of Reasons for Soundess/ Legal Complaince:
Why bother to say the council "will assist in the development of the rural economy" when there is no mention of this anywhere else in the document, or how it will be achieved.

Details of Changes to be Made:
Amend the objective to say "The council is not bothered about the rural economy but will help manage countryside resources, protecting and enhancing ....."
Details of Reasons for Soundness/ Legal Compliance:

1.1 We object to Spatial Planning Objective 1. Whilst we welcome the support for the rural economy support for this part of the economy must be more positive. Our clients have six rural businesses occupying converted buildings close to Stone Cross. These businesses provide valuable employment in the rural area and importantly sustain the upkeep of the historic buildings in which the businesses are accommodated and provide vital income to maintain the historic Peelings Manor. Rural businesses of this type can therefore be very valuable in rural areas.

1.2 Planning Policy Statement 4: Planning for Sustainable Economic Growth (PPS4) states in paragraph 10 that planning should "raise the quality of life and the environment in rural areas by promoting thriving, inclusive and locally distinctive communities."

1.3 The 2009 report of Matthew Taylor MP into the rural Economy and Affordable Housing. His report included the following recommendations and findings:

   a. The flight from the cities to the countryside has increased the rural population by 800,000 in the last decade twice the rate of increase in urban areas;
   b. Average wages for people in rural communities are below the national average;
   c. The planning system by looking at a narrow range of sustainability criteria is leading to many villages being classed as unsustainable and falling into decline; many villages are becoming exclusive enclaves of the wealthy and elderly;
   d. New planning policy should recognise that all forms of businesses can be appropriate in the countryside, existing businesses in the countryside should be allowed to grow in rural areas rather than being forced to move to towns, new planning policies should be devised to support rural business and employment. This shows the recognition in national planning policy that development should be used to raise the quality of life in rural areas, and that it can be a positive benefit as our clients experience demonstrates. The Taylor Review highlighted the needs of rural areas and how these needs should be addressed.

Details of Changes to be Made:

We consider that the first sentence in Spatial Planning Objective 1 should be changed to state "We will help manage countryside resources and promote the development of the rural economy whilst protecting and enhancing recognised biodiversity and geodiversity attributes, in particular we will protect the internationally important sites of the Pevensey levels and Ashdown Forest and other designated areas of bio and geodiversity."
Vision and Spatial Planning Objectives - Support 2.1 We support the WDC’s Spatial Planning Objectives (SPO1 – SP15). We consider the Objectives promote sustainable growth and strike an appropriate balance to accommodate that growth given the environmental and infrastructure requirements of the District. The Objectives will support Wealden’s aspiration to retain its rural character and high quality environment whilst achieving sufficient growth to support its economy, regenerate market towns and tackle deprivation. 2.2 To meet the ‘justified’ test of soundness, “the most appropriate strategy when considered against reasonable alternatives” needs to be explored. PPS12 expands on this further: ‘the ability to demonstrate that the plan is the most appropriate when considered against reasonable alternatives delivers confidence in the strategy. It requires the local planning authority to seek out and evaluate reasonable alternatives promoted by themselves and others to ensure that they bring forward those alternatives which they consider the LPA should evaluate as part of the plan making process. There is no point in inventing alternatives if they are not realistic. Being able to demonstrate that the plan is the most appropriate having gone through an objective process of assessing alternatives will pay dividends in terms of easier passage for the plan through the examination process. It will assist in evaluating the claims of those who wish to oppose the strategy.’ (PPS12, para 4.38 – PPS12’s own emphasis shown in italics) 2.3 In order to provide for a suitable strategy that strikes the right balance, WDC has prepared an extensive Evidence Base which identifies and assesses the various options available to WDC. These options are reviewed within the Background Papers (BP), in particular, BP1: Development of the Proposed Submission Core Strategy (section 5) and BP10: Sustainability Appraisal of Proposed Submission Core Strategy (Table 1.2). The Background Papers demonstrate the ‘appropriateness’ of the current proposed strategy, that ‘reasonable alternatives’ have been tested and that the Spatial Planning Objectives are found on ‘robust evidence’ i.e. the visions are ‘justified’ as required by PPS12. 2.4 The previous Spatial Development Options (June 2009) Consultation tested up to six different housing scenarios to accommodate the South East Plan (May 2009) housing target. In the light of the revocation of the RSS paragraphs 5.9 and 5.10 of BP1: Development of the Proposed Submission Core Strategy set out the steps which were addressed in determining the overall revised quantum of growth and the suitability of the proposed locations to accommodate this growth: ‘The Local Strategic Partnership focused upon meeting housing needs across the District, whilst Parish and Town Council’s within Wealden provided information on local growth issues and preferences’. This is further explored in paragraphs 5.11 – 5.37 and Section 7 of BP1: Development of the Proposed Submission Core Strategy including an assessment of the settlement hierarchy. 2.5 Section 8 of BP1: Development of the Proposed Submission Core Strategy is supported by section 8 of BP10: Sustainability Appraisal of Proposed Submission Core Strategy which in turn supports the Spatial Planning Objectives within the Core Strategy. The Options tested are considered realistic and are not ‘artificial’ as set out in paragraph 38 of PINS ‘Learning From Experience’ (Sept 2009) document, which states, ‘in some instances it appears that options are identified for the sake of having options rather than because they are realistic….if the options are limited there is no point in trying to artificially create them’. 2.6 The Spatial Planning Objectives therefore provide a clear vision and are specific to the challenges of the District. They are supported by the Evidence Base which has a clear audit trail, has tested all the reasonable alternatives and is therefore ‘justified’. Furthermore, the Objectives are consistent with National Policy including ‘emerging’ National Guidance contained in the Localism Bill (i.e. the level of housing has been determined by a locally derived need).

Details of Changes to be Made:
Vision and Spatial Planning Objectives - Support 2.1 We support the WDC’s Spatial Planning Objectives (SPO1 – SP15). We consider the Objectives promote sustainable growth and strike an appropriate balance to accommodate that growth given the environmental and infrastructure requirements of the District. The Objectives will support Wealden’s aspiration to retain its rural character and high quality environment whilst achieving sufficient growth to support its economy, regenerate market towns and tackle deprivation. 2.2 To meet the ‘justified’ test of soundness, “the most appropriate strategy when considered against reasonable alternatives” needs to be explored. PPS12 expands on this further: ‘the ability to demonstrate that the plan is the most appropriate when considered against reasonable alternatives delivers confidence in the strategy. It requires the local planning authority to seek out and evaluate reasonable alternatives promoted by themselves and others to ensure that they bring forward those alternatives which they consider the LPA should evaluate as part of the plan making process. There is no point in inventing alternatives if they are not realistic. Being able to demonstrate that the plan is the most appropriate having gone through an objective process of assessing alternatives will pay
dividends in terms of easier passage for the plan through the examination process. It will assist in evaluating the claims of those who wish to oppose the strategy.’ (PPS12, para 4.38 – PPS12’s own emphasis shown in italics)

2.3 In order to provide for a suitable strategy that strikes the right balance, WDC has prepared an extensive Evidence Base which identifies and assesses the various options available to WDC. These options are reviewed within the Background Papers (BP), in particular, BP1: Development of the Proposed Submission Core Strategy (section 5) and BP10: Sustainability Appraisal of Proposed Submission Core Strategy (Table 1.2). The Background Papers demonstrate the ‘appropriateness’ of the current proposed strategy, that ‘reasonable alternatives’ have been tested and that the Spatial Planning Objectives are found on ‘robust evidence’ i.e. the visions are ‘justified’ as required by PPS12.

2.4 The previous Spatial Development Options (June 2009) Consultation tested up to six different housing scenarios to accommodate the South East Plan (May 2009) housing target. In the light of the revocation of the RSS paragraphs 5.9 and 5.10 of BP1: Development of the Proposed Submission Core Strategy set out the steps which were addressed in determining the overall revised quantum of growth and the suitability of the proposed locations to accommodate this growth: ‘The Local Strategic Partnership focused upon meeting housing needs across the District, whilst Parish and Town Council’s within Wealden provided information on local growth issues and preferences’. This is further explored in paragraphs 5.11 – 5.37 and Section 7 of BP1: Development of the Proposed Submission Core Strategy including an assessment of the settlement hierarchy. 2.5 Section 8 of BP1: Development of the Proposed Submission Core Strategy is supported by section 8 of BP10: Sustainability Appraisal of Proposed Submission Core Strategy which in turn supports the Spatial Planning Objectives within the Core Strategy. The Options tested are considered realistic and are not ‘artificial’ as set out in paragraph 38 of PINS ‘Learning From Experience’ (Sept 2009) document, which states, ‘in some instances it appears that options are identified for the sake of having options rather than because they are realistic….if the options are limited there is no point in trying to artificially create them’. 2.6 The Spatial Planning Objectives therefore provide a clear vision and are specific to the challenges of the District. They are supported by the Evidence Base which has a clear audit trail, has tested all the reasonable alternatives and is therefore ‘justified’. Furthermore, the Objectives are consistent with National Policy including ‘emerging’ National Guidance contained in the Localism Bill (i.e. the level of housing has been determined by a locally derived need).

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<tr>
<td>Person ID</td>
<td>Mr Ankers</td>
</tr>
<tr>
<td>Agent ID</td>
<td>South Downs Society</td>
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<td>Sound</td>
<td>Yes</td>
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<td>Legally Compliant</td>
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Details of Reasons for Soundess/ Legal Complaince:
We generally support all 15 of these but SPO1 (Countryside and rural areas) should make specific mention of the downs.

Details of Changes to be Made:
### Representation ID
1396

**Person ID**  | Mr Marsh  
--- | ---
329021  | Mid Sussex District Council

**Agent ID**
Box 2

**Sound**  | Yes  
--- | ---
No  | Justified  | Effective  | Consistent with national policy

**Legally Compliant**
Yes  | No

### Details of Reasons for Soundness/ Legal Complaince:

Officers at Mid Sussex District Council are continuing to work jointly with Wealden in developing and implementing a strategic and co-ordinated approach to protecting the Ashdown Forest SAC/SPA. Work already undertaken between the two Councils has identified a series of measures to limit the impact of new development on the conservation interests of the Ashdown Forest. These measures include new development contributing to an appropriate level of mitigation in the form of providing Suitable Alternative Natural Green Space (SANGS) and support via developer contributions towards the Ashdown Forest Access Management Strategy. This strategy will need to specify measures for the management of visitors to Ashdown Forest in such a way that reduces their impact on the interest features of the designated site and will need be prepared and implemented in association with the conservators of Ashdown Forest, Natural England and other partners. In addition, further joint working will be required to develop and implement on site management measures to reduce nitrogen emissions emanating from the increased number of vehicles using the roads crossing Ashdown Forest. In combination with this, both Councils through their Local Development Frameworks will also need to delivery initiatives to reduce reliance on the motor vehicle, through creating sustainable communities, providing improvements to public transport, cycling and walking facilities. Pollution monitoring on the Forest will be required to assess the effectiveness of these measures. The recognition of this situation in paragraphs 3.22 6.34 and policy SPO1 is welcomed. The recognition within the Core Strategy of the impact on the Ashdown Forest that development within rural villages (such as Forest Road and Danehill) would have is welcomed. The strategy focussing growth at Uckfield, Crowborough, Heathfield and Hailsham and smaller- scale growth at villages within the Wealden District will go some way to minimising the negative impact development would have on the Ashdown Forest, especially in combination with further mitigation measures (such as SANGS).

### Details of Changes to be Made:

- **Yes**
- **No**
Details of Reasons for Soundness/ Legal Complaince:
We are pleased to see that your development distribution in policy WCS2 can be accommodated within existing consented capacities at Waste Water Treatment Works (WWTW). This is particularly important at the Hailsham North and South Waste Water Treatment Works that discharge into the Pevensey Levels. The Review of Consents As you are already aware, we are currently undertaking a Review of Consents (RoC) for the Pevensey Levels. The purposes of the RoC is to assess the impact of existing discharge consents into the Pevensey Levels, and make suitable changes where appropriate and fully justified. We have currently reached Stage 3 of the RoC which we are awaiting sign off from our Area Manager. We will make these results available to you at the earliest opportunity at the end of April 2011. The results will identify those consents that will require further assessment under the final Stage 4 of the RoC. We expect the final recommendations to be available by April 2012. This will be in time to inform your Site Allocations Development Plan Document. Through the course of the RoC there is a possibility that the existing consent for Hailsham North and South WWTWs will be reviewed which would have implications for the capacity of the works to accept the waste water flows from new development. We are happy that your Strategy is based on the most up to date information available, and you have addressed potential changes to existing consents through the RoC by considering phasing development with the provision of necessary infrastructure. Southern Water have also commissioned a study into alternative solutions for waste water treatment in the south of Wealden should it be needed. We therefore consider your Core Strategy sound in this regard. No Deterioration Policy We are awaiting the publication of a ‘No Deterioration’ policy from Defra. The policy will seek to achieve the Water Framework Directive (WFD) requirement of achieving good ecological status of all waterbodies and not allowing any deterioration in status. The impact of this Policy is similar to that of the Review of Consents, insofar as there is a potential risk that it will result in existing consents being tightened in line with WFD. Again, without this policy being in place, we are satisfied that your Strategy is based on the best available information and remains sound in this regard. Once the No Deterioration Policy is published we will consider how this will impact on your Site Allocations and the need for waste water infrastructure delivery.

Details of Changes to be Made:

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Details of Reasons for Soundess/ Legal Complaince:
In your Appropriate Assessment you have identified that Sustainable Drainage Systems (SuDS) will be necessary for all new development to mitigate the impact of surface water discharge on the Pevensey Levels. Given that your Core Strategy is very strategic we are satisfied that you can identify the types of SuDS appropriate for individual sites through your Site Allocations and Development Management Policies DPDs.

Details of Changes to be Made:
Summary of all Representations - Proposed Submission Core Strategy Regulation 27 - Report 11th July 2011

Representation ID
1523

Person ID  Mrs. Rudin
105986  Forest Row Parish Council

Agent ID
Box 2

Sound  ☑ Yes  ☐ No  ☐ Justified  ☐ Effective  ☐ Consistent with national policy

Legally Compliant  ☐ Yes  ☐ No

Details of Reasons for Soundess/ Legal Complaince:
Support for the overarching objectives that contribute to the Vision. They are laudable and, we believe, achievable in broad terms across the district.

Details of Changes to be Made:
7.1.1 In this section of the report we present our representations in regard to landscape matters in and informing the Core Strategy. Our representation is made in regard to paragraphs 3.30 – 3.33 of the submission Core Strategy, Policies WC4 and WC13 and supporting background papers. 7.1.2 For the purposes of this representation we have reviewed the ‘Landscape Character Assessment and Development Option Evaluation Study’ undertaken for the district (referred hereinafter as the ‘Landscape Study’), which is included as a background paper to the Core Strategy on the Councils website. However, it is not clear how the Landscape Study has been used to inform the spatial strategy as it is not specifically referred to in the text of Core Strategy nor is the Landscape Study listed as a background paper at paragraph 1.7 of the Core Strategy (although it is included as a background paper on the Councils website). 7.1.3 We have reviewed the methodology set out in the document and we have also reviewed whether the methodology has been consistently applied resulting in a final report that is robust, thorough and transparent and one that would form a credible evidence base suitable to inform the spatial strategy contained in the Core Strategy. 7.1.4 We contend that the Landscape Study is flawed and therefore the assessment of housing sites in the district, the spatial strategy and the Councils Sustainability Appraisal, and thus the Core Strategy, is unsound. 7.1.5 Our representation is summarised below: Section of Core Strategy: Spatial Planning Objectives 1, 3 and 11, Paras 3.30 - 3.33, Policy WCS4 Strategic Development Areas, Figure 6 Uckfield Area Strategy, Paras 6.9 and 6.11, Policy WSC13 Green Infrastructure, Paras 7.23 - 7.28Legally Compliant: -Sound: No -Effective: No -Consistent with national policy: No Proposed Submission Core Strategy Paragraphs 3.30 – 3.33 7.1.6 Paragraph 3.30 of the Proposed Submission Core Strategy refers to Wealden’s environmental attributes and that they have an important part to play in the development of the spatial strategy and ‘had a significant impact upon the assessment of the suitability of housing land in relation to the SHLAA’. 7.1.7 Paragraph 3.30 goes on to state that: ‘...and sites have been carefully scrutinised with regards to landscape impact.” 7.1.8 Paragraph 3.33 refers to Government guidance and the level of protection this provides for the environment, particularly nationally and internationally designated sites, which are not duplicated in the Core Strategy. The paragraph goes on to state: “However, our strategy has been guided by high levels of protection on local and national levels, and more detailed policies are contained within the Core Strategy and further ones in subsequent DPDs.” 7.1.9 Paragraph 1.7 in the Introduction to the Core Strategy refers to a number of specialist studies that have been produced to provide a robust evidence base to inform the Local Development Framework. The Landscape Study is not listed as a background paper at paragraph 1.7 of the Core Strategy (although it is included as a background paper on the Councils website). Policy WCS4 Strategic Development Areas and Paragraphs 6.9 and 6.11 7.1.10 The Core Strategy proposes that the land to the west of Uckfield be identified as a ‘strategic development area’ suitable for accommodating 1,000 homes and some 12,650 sq metres net of employment floor space and education provision as an extension to the urban area to the west of New Town. Paragraph 6.9 refers to the SHLAA and assessment of the potential sites at the fringes of the urban area. 7.1.11 In the light of the comments that follow in this section of our representations on the Landscape Study, it considered that this proposal be reassessed and, taking into account other representations made on other parts and policies contained in the Core Strategy, greater emphasis should be given to the suitability of land at Maresfield to accommodate increased housing numbers and a larger proportion of the housing requirements for the district. Policy WSC13 Green Infrastructure, Paragraphs 7.23 - 7.28 and Background Paper BP6 7.1.12 Policy WSC13 and paragraph 7.23 to 7.28 relating to Green Infrastructure is supported although it is considered that the anomalies and errors in the Landscape Study be addressed before this document is used to inform and guide the implementation of Green Infrastructure Strategy and also formulation of the specific measures for the protection and enhancement of the landscape which are to be set out in the Delivery and Site Allocations DPD referred to at paragraph 7.28 of the Core Strategy. 7.1.13 It is not clear from reading the Core Strategy, how the Landscape Study has been used to inform the above policies. 7.2 Consideration of the Methodology employed in the Landscape Study 7.2.1 Wealden Council commissioned the Landscape Study from the Landscape Group at East Sussex County Council, in September 2007. It was published in February 2009. The purpose of the Study is to: 1. Inform the preparation of WDC Local Development Framework Core Strategy and; 2. Inform the development policies on landscape management and protection. 7.2.2 The Landscape Study states that it will: 1. Assess the existing landscape character of key search areas 2. Assess the quality and value of the existing landscape in these key search areas 3. Assess the sensitivity if the existing landscape and its capacity to accept change or having regard to the scope for mitigation 4. Make recommendations on preferred locations from a landscape perspective. 7.2.3 The Landscape Study purports to use a number of methodologies for the assessment and
identifies these as being: 1. For Landscape Character/ Quality and Value - Design Manual for Roads and Bridges Vol 11, section 3, Part 5 (DT) which has been further refined by the Landscape Character Assessment Guidance for England and Scotland (CA/SNH 2002) and; 2. For landscape sensitivity – Landscape Character Assessment Guidance for England and Scotland, Topic Paper No.6: Techniques and criteria for Judging Capacity and Sensitivity (CA 2002). 7.2.4 The Landscape Study sets out, in section 2.0, the methodology and criteria used for each aspect of the landscape being assessed, including the following: 1. Landscape Quality (this should be ‘condition’ if following latest LCA guidance as the term quality is now a discredited approach to assessing landscapes) 2. Landscape Value 3. Landscape Sensitivity 4. Visual Sensitivity 5. Landscape Capacity 7.2.5 In relation to the assessment of landscape capacity, capacity is defined in Topic Paper No.6: ‘Techniques and Criteria for Judging Capacity and Sensitivity’ as: ‘The degree to which a particular landscape type or area is able to accommodate change without significant effect on its character, or overall change of landscape character type. Capacity is likely to vary according to the type and nature of change being proposed’. 7.2.6 We have reviewed the Landscape Study, in particular, the methodology set out in the document and whether this has been consistently applied to form a credible evidence base suitable to inform the spatial strategy contained in the Core Strategy. 7.2.7 The review of the Core Strategy background paper indicates that the Landscape Study has not followed the guidance in Topic Paper No.6. Topic Paper No.6 suggests that there are two approaches to assessing landscape sensitivity. These are: 1. Judging Overall Landscape Sensitivity and; 2. Judging Landscape Sensitivity to a specific type of change. 7.2.8 However, in order to assess landscape capacity, the assessment of the sensitivity of different types or areas of landscape to the type of change in question must be combined with an assessment of the more subjective or perceptual aspects of the landscape and of the value attached to the landscape. 7.2.9 The stages for assessing landscape capacity of a landscape are set out in Section 3.0 of Topic Paper No.6 and reproduced in Figure 7.1 below. Figure 7.1: Stages for assessing landscape capacity Source: Landscape Character Assessment Guidance for England and Scotland, Topic Paper No.6: Techniques and criteria for Judging Capacity and Sensitivity (CA 2002) 7.2.10 Sections 5.0 and 6.0 of Topic Paper No.6 provide the more detailed considerations that need to be taken into account. 7.2.11 The boxed text, at paragraph 2.11.2 of the Landscape Study, follows the same assessment stages used to assess the landscape capacity to accommodate a specific type of change and given the local scale of the assessment work it is considered that this is the appropriate method to use. 7.2.12 However, Topic Paper No.6, at paragraph 6.5, also goes on to state that: ‘Capacity is all a question of the interaction between the sensitivity of the landscape, the type and amount of change and the way that the landscape is valued’. 7.2.13 Sections 2.11 and 2.12 of the Landscape Study set out the approach used by East Sussex County Council landscape group in undertaking the landscape study. However, the assessment does not define the quantum of housing development used to assess the capacity of each character area, nor is the LDF Core Issues and Options Consultation Paper June 2007 referred to as a guide to the quantum of housing development used to assess each of the different character areas. The Landscape Study does however state at paragraph 2.12.3 that: ‘an overall assessment can be made for each character area on the capacity to accept the type of change being considered. This judgement is made according to the combination of characteristics that contribute to a particular area of landscape. The capacity of an area to accept change is related to the potential of the area to accommodate development in a particular location without detracting from the overall character of that landscape. The capacity evaluation of each character area does not assume that this is the capacity across the entire character area’ 7.2.14 There are a number interrelated issued raised in the above paragraph which we now turn to. 7.2.15 In relation to the type of change, the Landscape Study defines, at paragraph 2.12.6, the assumptions used for the assessment business uses, i.e. the assessment of sensitivity / capacity is based on light industrial type uses which would be consistent with a residential environment and these would be single storey units. However the Landscape Study does not define the full details of the housing use, such as type (housing - single storey / two storey / three storey etc) or amount (large / medium / small scale development) and we contend that the details of the change being considered is not transparent from the Landscape Study, as although the type of change (i.e. housing) is known, the form and amount of housing is unknown. These are important factors when considering the landscape capacity of an area to accommodate development, especially if using the stages set in the Landscape Study. 7.2.16 A similar assumption to the business use (or range of assumptions) could have been used for assessing the impact on landscape sensitivity / capacity of each character area. For example two to three storey houses at the following ranges: 1. small scale housing between five to 50 dwellings 2. medium scale housing development between 50 to 200 dwellings, and 3. large scale housing development between 200 to 500 dwellings. 7.2.17 In relation to the combination of the characteristics that contribute to a particular area, comments on these are made in later sections (See paragraphs 7.4.1 to 7.4.14 below). 7.2.18 The Landscape Study also refers to mitigation and management of the landscape (Section 2.13) and, in paragraph 2.13.1, it highlights that mitigation has been used to determine the visual and character sensitivity of the landscape. This approach does not accord with Topic Paper No.6 as mitigation should only be used to inform the visual sensitivity of the area assessed, (See Figure 7.1 above), and not directly the character sensitivity of an area (although visual aspects are one of the aspects that inform the character of an area). Mitigation in itself can have a significant effect on character and the landscapes capacity to accommodate development. In some cases mitigation would make an area less suitable to accommodate development not more suitable. Again this, we would contend, is a flaw in the assessment. The existing management of the landscape is relevant to determining the condition (or quality) of an area of landscape but the identification of management opportunities is not relevant to determining the capacity of the landscape to
accommodate development. Management of the land could in itself bring about a change to the landscape which is discordant with its character, for instance managing the land to encourage woodland growth or planting extensive woodlands in a very open exposed landscape would lead to a significant change. 7.2.19 The methodology section of the Landscape Study also includes a part dealing with the Areas of Outstanding Natural Beauty (AONB) within the district. Section 2.14 refers to ‘AONBs and AONB Buffer Zones’ as a way of identifying higher value landscapes within Wealden. At paragraph 2.14.2 the Landscape Study states: ‘There is, in some areas adjacent to the AONB boundary a buffer zone to the AONB landscape. This is usually an area of similar character but not of the same quality as the AONB landscape and not covered by the same planning policy. Where relevant these areas are indicated in the figures’. 7.2.20 Paragraph 2.14.4, the Landscape Study goes on the state the following: ‘These buffer zones have been identified through the character area analysis. The relative sensitivity of these areas has been considered according to the landscape character to achieve a balanced comparison with AONB and AONB landscapes’. 7.2.21 The Landscape Study considers that there is support for this ‘buffer zone’ approach due to Policy EN2 (f) of the East Sussex and Brighton and Hove Structure Plan. We contend that this approach is flawed and unsound. Firstly, the Structure Plan has been superseded by the South East Plan and at the time of preparing the Landscape Study during the period August 2007 to February 2009, both East Sussex County Council and Wealden District Council would have been aware of the emerging South East Plan policies through the draft regional plan. Secondly, Policy EN2 (f) does not prohibit development but seeks to protect the Sussex Downs and High Weald AONBs and minimise the impact of development within them by requiring measures to integrate the development in to the landscape. Thirdly, there is no Government policy support for the concept of ‘AONB buffers’ in Planning Policy Statement No.7. Like Policy EN2 of the Structure Plan, PPS 7 does not prohibit development within the boundaries or adjoining an AONB but merely seeks to ensure that the landscapes within AONBs are considered carefully and appropriate measures taken to mitigate the harm that potential development may cause. 7.2.22 The fourth point is that, whilst the Council would seek support from Policy EN2 (f) as a way of ‘balancing the comparison between AONB and non AONB areas’ especially the areas of landscape close to the AONB boundary, the East Sussex and Brighton and Hove Structure Plan does not define the extent of the buffer zone on the Key Diagram nor is the extent of the buffer area set out in its explanatory text. We contend that the justification for this approach must be given very little weight. 7.2.23 Lastly, it is acknowledged that some areas of landscape within an AONB may be of poorer condition (quality) score and / or lower visual and character sensitivity than areas outside of the AONB but the adjustment in the landscape sensitivity / capacity scoring by introducing what appears to be an arbitrary AONB buffer zone seems to undermine the purposes and status of the AONB designation,(and its planning policy protection), by attaching increased value to a character area that adjoins the AONB which although it may be of a similar character, does not meet the quality criteria for inclusion within the AONB. In addition, it is noted that the Landscape Study has not been subject to peer review and there is no evidence that it has had stakeholder input / consultation with statutory consultees, such Natural England / High Weald AONB Joint Advisory Committee and other interested bodies to agree this approach to the AONBs. 7.2.24 The Study goes on to set out the method used to undertake a comparative evaluation of a potential development area within a character area which has capacity to accommodate development. This gives an early indication of sites which would be worthy of further consideration for development in landscape terms. We contend that the comparative assessment of character areas within the District is flawed as the starting point for the assessment the landscape sensitivity / capacity analysis is unsound for the reason given above. 7.2.25 Notwithstanding the above point, Section 2.15.4 of the Landscape Study states that: ‘Prior to coming to a firm view on the full potential and scope in these areas further investigation would be required’. 7.2.26 However, the Study does not present evidence of this further investigation or how preferred development areas have been chosen; for example there is no detailed assessment of the west of Uckfield area although this has been identified as a major urban extension area under Policy WCS4 - SD1. 7.3 Critical Review of the findings of the Landscape Study 7.3.1 The Landscape Study methodology sets out how each landscape character is to be assessed and the information recorded using landscape character assessment sheets (section 2.5) whilst section 2.17 of the Landscape Study refers to mapping which is split into two stages. Stage 1 relates to recording baseline information on each character area such as planning designation, Public Right of Way and key viewpoint, focal point, landscape features and detractors (which should be read with the assessment record sheets). Stage 2 relates to the identification of potential development areas with indicative boundaries and also identifies key woods, shaws, hedges, tree belts etc and also the potential for mitigation planting. 7.3.2 In order to assess the robustness of the landscape capacity study for the purpose of this representation, the area around Uckfield, Maresfield and Five Ash Down were visited and the baseline information recorded on the landscape assessment sheets checked and the judgements reached reviewed. This check revealed that that were a number of elements / features not recorded or identified for some areas and therefore these factors were not able to inform the judgement reached. 7.3.3 For example, ‘Maresfield Area A’, is described as: ‘An open, undulating landscape used for pasture to the west and pleasure to the east. It is ungrazed showing some scrub. Wide long views to the south. Surrounded on other sides by mature trees and exotic Eucalyptus and Cedars from nearby Park. Fine houses on outskirts and within site. Fine clumps of Pines. Some road noise adjoins picturesque recreation ground’. 7.3.4 The assessment sheet omits a number of important features such as areas of woodlands and plantations, (some of which are ancient woodlands and provide screening, containment and form visual barriers). Hedges, fences, footpaths and reference to the bypass were not recorded. The assessment sheet also refers to parkland and that the majority of the land is amenity land lacking management. A wide long view(s) out to
the south is highlighted as a key feature which is correct when looking south from a small part of the area but elsewhere views are contained and obscured by landform and vegetation. The record sheet includes a photograph of the view south but this is not taken from the recreation ground as recorded on the map Figure 52. The photograph was taken from private land on the footpath. 7.3.5 In the visual appraisal section of the assessment sheet it records the local receptors as amenity land and houses, types of view as long views from top of ridge to the south and visual barriers as landform / trees and hedges. It concludes that the sensitivity is high (see table 7.1 below). It is acknowledged that there are views within the area but these tend to be short partial or glimpsed views with long views out towards the south from high ground in the north eastern parts of character area. Views into the area are very limited and development within the area would have a minimal impact on views. However, in views from the ridge to the south the recreation occupying the north eastern parts of the character area is seen whilst the remaining areas are hidden from view and therefore the visual sensitivity of the majority of the area is low. 7.3.6 The resultant evaluation of this area was considered as follows: Table 7.1: Landscape Study Assessment, Maresfield Area A Character Area Maresfield A Quality Good Value Medium Sensitivity to Change Moderate Visual Sensitivity High Management Opportunities Mange hedges and grazing. Mange recreational spaces and access to countryside. Need to retain gap between Maresfield and Uckfield. Potential for Mitigation Low Planting would change open character and obscure long views out from recreation ground Capacity to Accept Change: Housing Low Close to village edge only Capacity to Accept Change: Business Low 7.3.7 We contend that the record sheets are incorrect and the judgement on quality / condition is erroneous and should be ‘ordinary’ as most of the land is unmanaged comprising rank grassland of little intrinsic landscape value and the visual sensitivity of the area is ‘moderate or low’ due to the strong enclosure afforded to the area. It is interesting to note that one of the management opportunities is to retain a gap between Maresfield and Uckfield although there is no planning policy support for the retention of gaps in the Core Strategy or previous Non Statutory Wealden Local Plan. 7.3.8 By comparison, another example is Character Area L – land to the west of Uckfield, which is described as: ‘Land sloping away from urban edge to Uck valley and A26 Uckfield by pass. Strong field structure with arable and pasture. Some large fields. Sewage works detractors. Few focuses of character. Development would need a well defined edge to prevent creep’. 7.3.9 The assessment sheet for this character area has recorded the land cover and landscape elements correctly but has not recorded any landform features and relatively few aesthetic factors, although it describes the land as sloping away from the urban edge with a strong field structure with arable and pasture. The landscape condition is considered to be fair which is not defined in the methodology although this changes to ordinary in the comparison table. 7.3.10 In the visual appraisal section of the assessment sheet it records the local receptors as countryside on the other side of Uck Valley, isolated properties, footpaths and A26 and houses on the urban edge, types of view as views across to woods at West Park / Butcher’s Wood, wooded ridge of Shortbridge across Uckfield Valley and visual barriers as few. It concludes that the sensitivity is ‘moderate’ (see table 7.2). Table 7.2: Landscape Study Assessment, Uckfield Area L Character Area Uckfield L Quality Ordinary Value Medium Snap Accessible for recreation Sensitivity to Change Moderate Visual Sensitivity Moderate High on ridge Management Opportunities Mange urban fringe. Farm diversification pressure. Manage wood and existing trees and hedges Potential for Mitigation Moderate Low on ridge as need to retain open fields Soften urban edge. Create green network. Relocate recreation ground Capacity to Accept Change: Housing Moderate Need well defined boundaries close to urban edge avoid high ground Capacity to Accept Change: Business No capacity 7.3.11 We contend that the record sheets are incorrect and the judgement on quality / condition is under estimated and should be ‘good’ as most of the land is attractive farmed landscape with some distinctiveness features with a recognisable landscape structure. The assessment sheet ignores the open exposed nature of this character area, with long views south and west and numerous views in to the area from the surrounding countryside (roads and footpaths), and therefore the visual sensitivity of the area should be ‘high’ due the number of viewpoints where views can be obtained. This can be compared to the Maresfield A area which is considered to have ‘high’ sensitivity rating but with a few vantage points available where development impacts will be perceived. 7.3.12 We also note that under management opportunities it is considered that the area could contribute to managing the urban fringe, which could equally apply to the land at Maresfield, and that under the potential for mitigation heading is considered that the area has a ‘moderate’ ability, although the introduction of mitigate planting as shown Figure 11 of the landscape Study would dramatically and significantly change the landscape character of the area. 7.3.13 These examples illustrate the inconsistency of the landscape assessment record sheet and the arbitrary nature of the judgements made. It does not give any confidence to the manner in which the Landscape Study has been undertaken or to the transparent way that the judgements have been reached. 7.4 Implications for the soundness of the Core Strategy 7.4.1 We have reviewed the ‘Landscape Character Assessment and Development Option Evaluation Study’ of the district. It is not clear how this Landscape Study has been used to inform the spatial strategy as it is not specifically referred to in the Core Strategy, nor is the Landscape Study listed as a background paper at paragraph 1.7 of the Core Strategy (although it is included as a background paper on the Councils website). 7.4.2 We have reviewed the methodology set out in the document and we have also reviewed whether the methodology has been consistently applied resulting in a final report that is robust, thorough, and transparent and that it would form a credible evidence base suitable to inform the spatial strategy contained in the Core Strategy. The Study also includes a methodology employed to undertake a comparative evaluation of a potential development area within a character area which has capacity to accommodate development. 7.4.3 The examples referred to in our analysis above illustrate the inconsistency of the landscape assessment record sheets and arbitrary nature of the judgements made and it does not give any confidence to the manner in which the
Landscape Study has been undertaken or to the transparent way that the judgements have been reached. 7.4.4 We contend that the Landscape Study is flawed and therefore the assessment of housing sites in the district, the spatial strategy and the Councils Sustainability Appraisal is unsound. In addition, in relation to the comparison assessment of sites within the district surrounding the towns and villages; we contend that this comparative assessment of character areas is flawed as the starting point for the assessment the landscape sensitivity/capacity analysis is unsound for the reason given above. 7.4.5 The Core Strategy proposes that the land to the west of Uckfield be identified as a ‘strategic development area’ suitable for accommodating 1,000 homes and some 12,650 sq metres net of employment floor space and education provision as an extension to the urban area to the west of New Town. In the light of the comments made on the Landscape Study, it is considered that this proposal be reassessed and, (taking into account the other representations made on other parts and policies contained in the Core Strategy), greater emphasis be given to the suitability of land at Maresfield to accommodate increased housing numbers and a larger proportion of the housing requirements for the district. 7.4.6 Policy WSC13 relating to Green Infrastructure is supported although it is considered that the anomalies and errors in the Landscape Study be addressed before this document is used to inform and guide the implementation of Green Infrastructure Strategy and also formulation of the specific measures for the protection and enhancement of the landscape which are to set out in the Delivery and Site Allocations DPD referred to at paragraph 7.28 of the Core Strategy.

Details of Changes to be Made:

SUMMARY 7.4.7 In conclusion, we contend that the Core Strategy is unsound because: 1. It is not justified as it is not based on a sound evidence base as the Landscape Study (Landscape Character Assessment and Development Options Evaluation Study of the District) is flawed and therefore the assessment of housing sites in the district, the spatial strategy and the Councils Sustainability Appraisal is unsound. It is not clear how the Landscape Study has been used to inform the spatial strategy as it is not specifically referred to in the Core Strategy nor is the Landscape Study listed as a background paper at paragraph 1.7 of the Core Strategy; 2. It is not justified because the Landscape Study as it is not robust, thorough, and transparent and that it does not form a credible evidence base suitable to inform the spatial strategy contained in the Core Strategy. The Landscape Study contains a number inconsistencies set out in the landscape assessment record sheets and contains a number of arbitrary judgements and so it does not give any confidence to the manner in which the Landscape Study has been undertaken or to the transparent way that the judgements have been reached 3. It is not consistent with national policy as the methodology for undertaking the Landscape Study (which has been used to inform the spatial strategy) refers to ‘AONB and AONB Buffer Zones’ as a way of identifying higher value landscapes. There are a number of reasons why this approach is unsound but there is no Government policy support for the concept of ‘AONB buffers’ in Planning Policy Statement No.7 or any other policy guidance.
In this section of the report we present our representations in regard to landscape matters in and informing the Core Strategy. Our representation is made in regard to paragraphs 3.30 – 3.33 of the submission Core Strategy, Policies WC4 and WC13 and supporting background papers. For the purposes of this representation we have reviewed the ‘Landscape Character Assessment and Development Option Evaluation Study’ undertaken for the district (referred hereinafter as the ‘Landscape Study’), which is included as a background paper to the Core Strategy on the Councils website. However, it is not clear how the Landscape Study has been used to inform the spatial strategy as it is not specifically referred to in the text of Core Strategy nor is the Landscape Study listed as a background paper at paragraph 1.7 of the Core Strategy (although it is included as a background paper on the Councils website). We have reviewed the methodology set out in the document and we have also reviewed whether the methodology has been consistently applied resulting in a final report that is robust, thorough and transparent and one that would form a credible evidence base suitable to inform the spatial strategy contained in the Core Strategy. We contend that the Landscape Study is flawed and therefore the assessment of housing sites in the district, the spatial strategy and the Councils Sustainability Appraisal, and thus the Core Strategy, is unsound.

Our representation is summarised below: Section of Core Strategy: Spatial Planning Objectives 1, 3 and 11, Paras 3.30 - 3.33, Policy WCS4 Strategic Development Areas, Figure 6 Uckfield Area Strategy, Paras 6.9 and 6.11, Policy WSC13 Green Infrastructure, Paras 7.23 - 7.28Legally Compliant: -Sound: NoJustified: NoEffective: NoConsistent with national policy: No Proposed Submission Core Strategy Paragraphs 3.30 - 3.33 7.1.6 Paragraph 3.30 of the Proposed Submission Core Strategy refers to Wealden’s environmental attributes and that they have an important part to play in the development of the spatial strategy and ‘had a significant impact upon the assessment of the suitability of housing land in relation to the SHLAA’. 7.1.7 Paragraph 3.30 goes on to state that: “...and sites have been carefully scrutinised with regards to landscape impact.” 7.1.8 Paragraph 3.33 refers to Government guidance and the level of protection this provides for the environment, particularly nationally and internationally designated sites, which are not duplicated in the Core Strategy. The paragraph goes on to state: “However, our strategy has been guided by high levels of protection on local and national levels, and more detailed policies are contained within the Core Strategy and further ones in subsequent DPDs.” 7.1.9 Paragraph 1.7 in the Introduction to the Core Strategy refers to a number of specialist studies that have been produced to provide a robust evidence base to inform the Local Development Framework. The Landscape Study is not listed as a background paper at paragraph 1.7 of the Core Strategy (although it is included as a background paper on the Councils website). Policy WCS4 Strategic Development Areas and Paragraphs 6.9 and 6.11 7.1.10 The Core Strategy proposes that the land to the west of Uckfield be identified as a ‘strategic development area’ suitable for accommodating 1,000 homes and some 12,650 sq metres net of employment floor space and education provision as an extension to the urban area to the west of New Town. Paragraph 6.9 refers to the SHLAA and assessment of the potential sites at the fringes of the urban area. 7.1.11 In the light of the comments that follow in this section of our representations on the Landscape Study, it considered that this proposal be reassessed and, taking into account other representations made on other parts and policies contained in the Core Strategy, greater emphasis should be given to the suitability of land at Maresfield to accommodate increased housing numbers and a larger proportion of the housing requirements for the district. Policy WSC13 Green Infrastructure, Paragraphs 7.23 - 7.28 and Background Paper BP6 7.1.12 Policy WSC13 and paragraph 7.23 to 7.28 relating to Green Infrastructure is supported although it is considered that the anomalies and errors in the Landscape Study be addressed before this document is used to inform and guide the implementation of Green Infrastructure Strategy and also formulation of the specific measures for the protection and enhancement of the landscape which are to be set out in the Delivery and Site Allocations DPD referred to at paragraph 7.28 of the Core Strategy. 7.1.13 It is not clear from reading the Core Strategy, how the Landscape Study has been used to inform the above policies. 7.2 Consideration of the Methodology employed in the Landscape Study 7.2.1 Wealden Council commissioned the Landscape Study from the Landscape Group at East Sussex County Council, in September 2007. It was published in February 2009. The purpose of the Study is to: 1. Inform the preparation of WDC Local Development Framework Core Strategy and; 2. Inform the development policies on landscape management and protection. 7.2.2 The Landscape Study states that it will: 1. Assess the existing landscape character of key search areas 2. Assess the quality and value of the existing landscape in these key search areas 3. Assess the sensitivity if the existing landscape and its capacity to accept change or having regard to the scope for mitigation 4. Make recommendations on preferred locations from a landscape perspective. 7.2.3 The Landscape Study purports to use a number of methodologies for the assessment and
identifies these as being: 1. For Landscape Character/ Quality and Value - Design Manual for Roads and Bridges Vol 11, section 3, Part 5 (DT) which has been further refined by the Landscape Character Assessment Guidance for England and Scotland (CA/SNH 2002) and; 2. For landscape sensitivity – Landscape Character Assessment Guidance for England and Scotland, Topic Paper No.6: Techniques and criteria for Judging Capacity and Sensitivity (CA 2002). 7.2.4 The Landscape Study sets out, in section 2.0, the methodology and criteria used for each aspect of the landscape being assessed, including the following: 1. Landscape Quality (this should be ‘condition’ if following latest LCA guidance as the term quality is now a discredited approach to assessing landscapes) 2. Landscape Value 3. Landscape Sensitivity 4. Visual Sensitivity 5. Landscape Capacity 7.2.5 In relation to the assessment of landscape capacity, capacity is defined in Topic Paper No.6: ‘Techniques and Criteria for Judging Capacity and Sensitivity’ as: ‘The degree to which a particular landscape type or area is able to accommodate change without significant effect on its character, or overall change of landscape character type. Capacity is likely to vary according to the type and nature of change being proposed’. 7.2.6 We have reviewed the Landscape Study, in particular, the methodology set out in the document and whether this has been consistently applied to form a credible evidence base suitable to inform the spatial strategy contained in the Core Strategy. 7.2.7 The review of the Core Strategy background paper indicates that the Landscape Study has not followed the guidance in Topic Paper No.6. Topic Paper No.6 suggests that there are two approaches to assessing landscape sensitivity. These are: 1. Judging Overall Landscape Sensitivity and; 2. Judging Landscape Sensitivity to a specific type of change. 7.2.8 However, in order to assess landscape capacity, the assessment of the sensitivity of different types or areas of landscape to the type of change in question must be combined with an assessment of the more subjective or perceptual aspects of the landscape and of the value attached to the landscape. 7.2.9 The stages for assessing landscape capacity of a landscape are set out in Section 3.0 of Topic Paper No.6 and reproduced in Figure 7.1 below. Figure 7.1: Stages for assessing landscape capacity Source: Landscape Character Assessment Guidance for England and Scotland, Topic Paper No.6: Techniques and criteria for Judging Capacity and Sensitivity (CA 2002) 7.2.10 Sections 5.0 and 6.0 of Topic Paper No.6 provide the more detailed considerations that need to be taken into account. 7.2.11 The boxed text, at paragraph 2.11.2 of the Landscape Study, follows the same assessment stages used to assess the landscape capacity to accommodate a specific type of change and given the local scale of the assessment work it is considered that this is the appropriate method to use. 7.2.12 However, Topic Paper No.6, at paragraph 6.5, also goes on to state that: ‘Capacity is all a question of the interaction between the sensitivity of the landscape, the type and amount of change and the way that the landscape is valued’. 7.2.13 Sections 2.11 and 2.12 of the Landscape Study set out the approach used by East Sussex County Council landscape group in undertaking the landscape study. However, the assessment does not define the quantum of housing development used to assess the capacity of each character area, nor is the LDF Core Issues and Options Consultation Paper July 2007 referred to as a guide to the quantum of housing development used to assess each of the different character areas. The Landscape Study does however state at paragraph 2.12.3 that: ‘an overall assessment can be made for each character area on the capacity to accept the type of change being considered. This judgement is made according to the combination of characteristics that contribute to a particular area of landscape. The capacity of an area to accept change is related to the potential of the area to accommodate development in a particular location without detracting from the overall character of that landscape. The capacity evaluation of each character area does not assume that this is the capacity across the entire character area’ 7.2.14 There are a number interrelated issues raised in the above paragraph which we now turn to. 7.2.15 In relation to the type of change, the Landscape Study defines, at paragraph 2.12.6, the assumptions used for the assessment business uses, i.e. the assessment of sensitivity / capacity is based on light industrial type uses which would be consistent with a residential environment and these would be single storey units. However the Landscape Study does not define the full details of the housing use, such as type (housing - single storey / two storey / three storey etc) or amount (large / medium / small scale development) and we contend that the details of the change being considered is not transparent from the Landscape Study, as although the type of change (i.e. housing) is known, the form and amount of housing is unknown. These are important factors when considering the landscape capacity of an area to accommodate development, especially if using the stages set in the Landscape Study. 7.2.16 A similar assumption to the business use (or range of assumptions) could have been used for assessing the impact on housing on landscape sensitivity / capacity of each character area. For example two to three storey houses at the following ranges: 1. small scale housing between five to 50 dwellings 2. medium scale housing development between 50 to 200 dwellings, and 3. large scale housing development between 200 to 500 dwellings. 7.2.17 In relation to the combination of the characteristics that contribute to a particular area, comments on these are made in later sections (See paragraphs 7.4.1 to 7.4.14 below). 7.2.18 The Landscape Study also refers to mitigation and management of the landscape (Section 2.13) and, in paragraph 2.13.1, it highlights that mitigation has been used to determine the visual and character sensitivity of the landscape. This approach does not accord with Topic Paper No.6 as mitigation should only be used to inform the visual sensitivity of the area assessed, (See Figure 7.1 above), and not directly the character sensitivity of an area (although visual aspects are one of the aspects that inform the character of an area). Mitigation in itself can have a significant effect on character and the landscapes capacity to accommodate development. In some cases mitigation would make an area less suitable to accommodate development not more suitable. Again this, we would contend, is a flaw in the assessment. The existing management of the landscape is relevant to determining the condition (or quality) of an area of landscape but the identification of management opportunities is not relevant to determining the capacity of the landscape to
accommodate development. Management of the land could in itself bring about a change to the landscape which is discordant with its character, for instance managing the land to encourage woodland growth or planting extensive woodlands in a very open exposed landscape would lead to a significant change. 7.2.19 The methodology section of the Landscape Study also includes a part dealing with the Areas of Outstanding Natural Beauty (AONB) within the district. Section 2.14 refers to ‘AONBs and AONB Buffer Zones’ as a way of identifying higher value landscapes within Wealden. At paragraph 2.14.2 the Landscape Study states: ‘There is, in some areas adjacent to the AONB boundary a buffer zone to the AONB landscape. This is usually an area of similar character but not of the same quality as the AONB landscape and not covered by the same planning policy. Where relevant these areas are indicated in the figures’. 7.2.20 Paragraph 2.14.4, the Landscape Study goes on the state the following: ‘These buffer zones have been identified through the character area analysis. The relative sensitivity of these areas has been considered according to the landscape character to achieve a balanced comparison with AONB and AONB landscapes’. 7.2.21 The Landscape Study considers that there is support for this ‘buffer zone’ approach due to Policy EN2 (f) of the East Sussex and Brighton and Hove Structure Plan. We contend that this approach is flawed and unsound. Firstly, the Structure Plan has been superseded by the South East Plan and at the time of preparing the Landscape Study during the period August 2007 to February 2009, both East Sussex County Council and Wealden District Council would have been aware of the emerging South East Plan policies through the draft regional plan. Secondly, Policy EN2 (f) does not prohibit development but seeks to protect the Sussex Downs and High Weald AONBs and minimise the impact of development within them by requiring measures to integrate the development into the landscape. Thirdly, there is no Government policy support for the concept of ‘AONB buffers’ in Planning Policy Statement No.7. Like Policy EN2 of the Structure Plan, PPS 7 does not prohibit development within the boundaries or adjoining an AONB but merely seeks to ensure that the landscapes within AONBs are considered carefully and appropriate measures taken to mitigate the harm that potential development may cause. 7.2.22 The fourth point is that, whilst the Council would seek support from Policy EN2 (f) as a way of ‘balancing the comparison between AONB and non AONB areas’ especially the areas of landscape close to the AONB boundary, the East Sussex and Brighton and Hove Structure Plan does not define the extent of the buffer zone on the Key Diagram nor is the extent of the buffer area set out in its explanatory text. We contend that the justification for this approach must be given very little weight. 7.2.23 Lastly, it is acknowledged that some areas of landscape within an AONB may be of poorer condition (quality) score and / or lower visual and character sensitivity than areas outside of the AONB but the adjustment in the landscape sensitivity / capacity scoring by introducing what appears to be an arbitrary AONB buffer zone seems to undermine the purposes and status of the AONB designation, (and its planning policy protection), by attaching increased value to a character area that adjoins the AONB which although it may be of a similar character, does not meet the quality criteria for inclusion within the AONB. In addition, it is noted that the Landscape Study has not been subject to peer review and there is no evidence that it has had stakeholder input / consultation with statutory consultees, such Natural England / High Weald AONB Joint Advisory Committee and other interested bodies to agree this approach to the AONBs. 7.2.24 The Study goes on to set out the method used to undertake a comparative evaluation of a potential development area within a character area which has capacity to accommodate development. This gives an early indication of sites which would be worthy of further consideration for development in landscape terms. We contend that the comparative assessment of character areas within the District is flawed as the starting point for the assessment the landscape sensitivity / capacity analysis is unsound for the reason given above. 7.2.25 Notwithstanding the above point, Section 2.15.4 of the Landscape Study states that: ‘Prior to coming to a firm view on the full potential and scope in these areas further investigation would be required’. 7.2.26 However, the Study does not present evidence of this further investigation or how preferred development areas have been chosen; for example there is no detailed assessment of the west of Uckfield area although this has been identified as a major urban extension area under Policy WCS4 - SD1. 7.3 Critical Review of the findings of the Landscape Study 7.3.1 The Landscape Study methodology sets out how each landscape character is to be assessed and the information recorded using landscape character assessment sheets (section 2.5) whilst section 2.17 of the Landscape Study refers to mapping which is split into two stages. Stage 1 relates to recording baseline information on each character area such as planning designation, Public Right of Way and key viewpoint, focal point, landscape features and detractors (which should be read with the assessment record sheets). Stage 2 relates to the identification of potential development areas with indicative boundaries and also identifies key woods, shaws, hedges, tree belts etc and also the potential for mitigation planting. 7.3.2 In order to assess the robustness of the landscape capacity study for the purpose of this representation, the area around Uckfield, Maresfield and Five Ash Down were visited and the baseline information recorded on the landscape assessment sheets checked and the judgements reached reviewed. This check revealed that that were a number of elements / features not recorded or identified for some areas and therefore these factors were not able to inform the judgement reached. 7.3.3 For example, ‘Maresfield Area A’, is described as: ‘An open, undulating landscape used for pasture to the west and pleasure to the east. It is ungrazed showing some scrub. Wide long views to the south. Surrounded on other sides by mature trees and exotic Eucalyptus and Cedars from nearby Park. Fine houses on outskirts and within site. Fine clumps of Pines. Some road noise adjoins picturesque recreation ground’. 7.3.4 The assessment sheet omits a number of important features such as areas of woodlands and plantations, (some of which are ancient woodlands and provide screening, containment and form visual barriers). Hedges, fences, footpaths and reference to the bypass were not recorded. The assessment sheet also refers to parkland and that the majority of the land is amenity land lacking management. A wide long view(s) out to
the south is highlighted as a key feature which is correct when looking south from a small part of the area but elsewhere views are contained and obscured by landform and vegetation. The record sheet includes a photograph of the view south but this is not taken from the recreation ground as recorded on the map Figure 52. The photograph was taken from private land on the footpath. 7.3.5 In the visual appraisal section of the assessment sheet it records the local receptors as amenity land and houses, types of view as long views from top of ridge to the south and visual barriers as landform / trees and hedges. It concludes that the sensitivity is high (see table 7.1 below). It is acknowledged that there are views within the area but these tend to be short partial or glimpsed views with long views out towards the south from high ground in the north eastern parts of character area. Views into the area are very limited and development within the area would have a minimal impact on views. However, in views from the ridge to the south the recreation occupying the north eastern parts of the character area is seen whilst the remaining areas are hidden from view and therefore the visual sensitivity of the majority of the area is low. 7.3.6 The resultant evaluation of this area was considered as follows: Table 7.1: Landscape Study Assessment, Maresfield Area A Character Area Maresfield A Quality Good Value Medium Sensitivity to Change Moderate Visual Sensitivity High Management Opportunities Mange hedges and grazing. Mange recreational spaces and access to countryside. Need to retain gap between Maresfield and Uckfield. Potential for Mitigation LowPlanting would change open character and obscure long views out from recreation ground Capacity to Accept Change: Housing LowClose to village edge only Capacity to Accept Change: Business Low 7.3.7 We contend that the record sheets are incorrect and the judgement on quality / condition is erroneous and should be ‘ordinary’ as most of the land is unmanaged comprising rank grassland of little intrinsic landscape value and the visual sensitivity of the area is ‘moderate or low’ due to the strong enclosure afforded to the area. It is interesting to note that one of the management opportunities is to retain a gap between Maresfield and Uckfield although there is no planning policy support for the retention of gaps in the Core Strategy or previous Non Statutory Wealden Local Plan. 7.3.8 By comparison, another example is Character Area L – land to the west of Uckfield, which is described as: ‘Land sloping away from urban edge to Uck valley and A26 Uckfield by pass. Strong field structure with arable and pasture. Some large fields. Sewage works detractors. Few focuses of character. Development would need a well defined edge to prevent creep’. 7.3.9 The assessment sheet for this character area has recorded the land cover and landscape elements correctly but has not recorded any landform features and relatively few aesthetic factors, although it describes the land as sloping away from the urban edge with a strong field structure with arable and pasture. The landscape condition is considered to be fair which is not defined in the methodology although this changes to ordinary in the comparison table. 7.3.10 In the visual appraisal section of the assessment sheet it records the local receptors as countryside on the other side of Uck Valley, isolated properties, footpaths and A26 and houses on the urban edge, types of view as views across to woods at West Park / Butchers Wood, wooded ridge of Shortbridge across Uckfield Valley and visual barriers as few. It concludes that the sensitivity is ‘moderate’ (see table 7.2). Table 7.2: Landscape Study Assessment, Uckfield Area L Character Area Uckfield L Quality Ordinary Value MediumSnawAccessible for recreation Sensitivity to Change Moderate Visual Sensitivity Moderate High on ridge Management Opportunities Mange urban fringe. Farm diversification pressure. Manage wood and existing trees and hedges Potential for Mitigation ModerateLow on ridge as need to retain open fields Soften urban edge. Create green network. Relocate recreation ground Capacity to Accept Change: Housing ModerateNeed well defined boundaries close to urban edge avoid high ground Capacity to Accept Change: Business No capacity 7.3.11 We contend that the record sheets are incorrect and the judgement on quality / condition is under estimated and should be ‘good’ as most of the land is attractive farmed landscape with some distinctiveness features with a recognisable landscape structure. The assessment sheet ignores the open exposed nature of this character area, with long views south and west and numerous views in to the area from the surrounding countryside (roads and footpaths), and therefore the visual sensitivity of the area should be ‘high’ due the number of viewpoints where views can be obtained. This can be compared to the Maresfield A area which is considered to have ‘high’ sensitivity rating but with a few vantage points available where development impacts will be perceived. 7.3.12 We also note that under management opportunities it is considered that the area could contribute to managing the urban fringe, which could equally apply to the land at Maresfield, and that under the potential for mitigation heading is considered that the area has a ‘moderate’ ability, although the introduction of mitigate planting as shown Figure 11 of the landscape Study would dramatically and significantly change the landscape character of the area. 7.3.13 These examples illustrate the inconsistency of the landscape assessment record sheet and the arbitrary nature of the judgements made. It does not give any confidence to the manner in which the Landscape Study has been undertaken or to the transparent way that the judgements have been reached. 7.4 Implications for the soundness of the Core Strategy 7.4.1 We have reviewed the ‘Landscape Character Assessment and Development Option Evaluation Study’ of the district. It is not clear how this Landscape Study has been used to inform the spatial strategy as it is not specifically referred to in the Core Strategy, nor is the Landscape Study listed as a background paper at paragraph 1.7 of the Core Strategy (although it is included as a background paper on the Councils website). 7.4.2 We have reviewed the methodology set out in the document and we have also reviewed whether the methodology has been consistently applied resulting in a final report that is robust, thorough, and transparent and that it would form a credible evidence base suitable to inform the spatial strategy contained in the Core Strategy. The Study also includes a methodology employed to undertake a comparative evaluation of a potential development area within a character area which has capacity to accommodate development. 7.4.3 The examples referred to in our analysis above illustrate the inconsistency of the landscape assessment record sheets and arbitrary nature of the judgements made and it does not give any confidence to the manner in which the
Summary of all Representations - Proposed Submission Core Strategy Regulation 27 - Report 11th July 2011

Landscape Study has been undertaken or to the transparent way that the judgements have been reached. 7.4.4 We contend that the Landscape Study is flawed and therefore the assessment of housing sites in the district, the spatial strategy and the Councils Sustainability Appraisal is unsound. In addition, in relation to the comparison assessment of sites within the district surrounding the towns and villages; we contend that this comparative assessment of character areas is flawed as the starting point for the assessment the landscape sensitivity/capacity analysis is unsound for the reason given above. 7.4.5 The Core Strategy proposes that the land to the west of Uckfield be identified as a ‘strategic development area’ suitable for accommodating 1,000 homes and some 12,650 sq metres net of employment floor space and education provision as an extension to the urban area to the west of New Town. In the light of the comments made on the Landscape Study, it is considered that this proposal be reassessed and, (taking into account the other representations made on other parts and policies contained in the Core Strategy), greater emphasis be given to the suitability of land at Maresfield to accommodate increased housing numbers and a larger proportion of the housing requirements for the district. 7.4.6 Policy WSC13 relating to Green Infrastructure is supported although it is considered that the anomalies and errors in the Landscape Study be addressed before this document is used to inform and guide the implementation of Green Infrastructure Strategy and also formulation of the specific measures for the protection and enhancement of the landscape which are to set out in the Delivery and Site Allocations DPD referred to at paragraph 7.28 of the Core Strategy. ’

Details of Changes to be Made:
SUMMARY 7.4.7 In conclusion, we contend that the Core Strategy is unsound because: 1. It is not justified as it is not based on a sound evidence base as the Landscape Study (Landscape Character Assessment and Development Options Evaluation Study of the District) is flawed and therefore the assessment of housing sites in the district, the spatial strategy and the Councils Sustainability Appraisal is unsound. It is not clear how the Landscape Study has been used to inform the spatial strategy as it is not specifically referred to in the Core Strategy nor is the Landscape Study listed as a background paper at paragraph 1.7 of the Core Strategy; 2. It is not justified because the Landscape Study as it is not robust, thorough, and transparent and that it does not form a credible evidence base suitable to inform the spatial strategy contained in the Core Strategy. The Landscape Study contains a number inconsistencies set out in the landscape assessment record sheets and contains a number of arbitrary judgements and so it does not give any confidence to the manner in which the Landscape Study has been undertaken or to the transparent way that the judgements have been reached 3. It is not consistent with national policy as the methodology for undertaking the Landscape Study (which has been used to inform the spatial strategy) refers to ‘AONB and AONB Buffer Zones’ as a way of identifying higher value landscapes. There are a number of reasons why this approach is unsound but there is no Government policy support for the concept of ‘AONB buffers’ in Planning Policy Statement No.7 or any other policy guidance.

Representation ID
263
Person ID Mr Hurwood Agent ID
134707 CPRE Sussex, Wealden South Group Box 3
Sound ☐ Yes ☐ No ☐ Justified ☐ Effective ☐ Consistent with national policy
Legally Compliant ☐ Yes ☐ No
Details of Reasons for Soundness/ Legal Compliance:
Details of Changes to be Made:
As with SPO1, the setting and local environment should be protected.
### Details of Reasons for Soundess/ Legal Complaince:

We feel the wording of SP02 should be amended to replace the words 'the historic environment is protected' with 'the historic environment is conserved'.

### Details of Changes to be Made:

- The wording of SP02 should be amended to replace the words 'the historic environment is protected' with 'the historic environment is conserved'.

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**Representation ID**

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Vision and Spatial Planning Objectives - Support 2.1 We support the WDC’s Spatial Planning Objectives (SPO1 – SP15). We consider the Objectives promote sustainable growth and strike an appropriate balance to accommodate that growth given the environmental and infrastructure requirements of the District. The Objectives will support Wealden’s aspiration to retain its rural character and high quality environment whilst achieving sufficient growth to support its economy, regenerate market towns and tackle deprivation. 2.2 To meet the ‘justified’ test of soundness, “the most appropriate strategy when considered against reasonable alternatives” needs to be explored. PPS12 expands on this further: ‘the ability to demonstrate that the plan is the most appropriate when considered against reasonable alternatives delivers confidence in the strategy. It requires the local planning authority to seek out and evaluate reasonable alternatives promoted by themselves and others to ensure that they bring forward those alternatives which they consider the LPA should evaluate as part of the plan making process. There is no point in inventing alternatives if they are not realistic. Being able to demonstrate that the plan is the most appropriate having gone through an objective process of assessing alternatives will pay dividends in terms of easier passage for the plan through the examination process. It will assist in evaluating the claims of those who wish to oppose the strategy.’ (PPS12, para 4.38 – PPS12’s own emphasis shown in italics)

2.3 In order to provide for a suitable strategy that strikes the right balance, WDC has prepared an extensive Evidence Base which identifies and assesses the various options available to WDC. These options are reviewed within the Background Papers (BP), in particular, BP1: Development of the Proposed Submission Core Strategy (section 5) and BP10: Sustainability Appraisal of Proposed Submission Core Strategy (Table 1.2). The Background Papers demonstrate the ‘appropriateness’ of the current proposed strategy, that ‘reasonable alternatives’ have been tested and that the Spatial Planning Objectives are found on ‘robust evidence’ i.e. the visions are ‘justified’ as required by PPS12. 2.4 The previous Spatial Development Options (June 2009) Consultation tested up to six different housing scenarios to accommodate the South East Plan (May 2009) housing target. In the light of the revocation of the RSS paragraphs 5.9 and 5.10 of BP1: Development of the Proposed Submission Core Strategy set out the steps which were addressed in determining the overall revised quantum of growth and the suitability of the proposed locations to accommodate this growth: ‘The Local Strategic Partnership focused upon meeting housing needs across the District, whilst Parish and Town Council’s within Wealden provided information on local growth issues and preferences’. This is further explored in paragraphs 5.11 – 5.37 and Section 7 of BP1: Development of the Proposed Submission Core Strategy including an assessment of the settlement hierarchy. 2.5 Section 8 of BP1: Development of the Proposed Submission Core Strategy is supported by section 8 of BP10: Sustainability Appraisal of Proposed Submission Core Strategy which in turn supports the Spatial Planning Objectives within the Core Strategy. The Options tested are considered realistic and are not ‘artificial’ as set out in paragraph 38 of PINS ‘Learning From Experience’ (Sept 2009) document, which states, ‘in some instances it appears that options are identified for the sake of having options rather than because they are realistic….if the options are limited there is no point in trying to artificially create them’. 2.6 The Spatial Planning Objectives therefore provide a clear vision and are specific to the challenges of the District. They are supported by the Evidence Base which has a clear audit trail, has tested all the reasonable alternatives and is therefore ‘justified’. Furthermore, the Objectives are consistent with National Policy including ‘emerging’ National Guidance contained in the Localism Bill (i.e. the level of housing has been determined by a locally derived need).

Details of Changes to be Made:
Vision and Spatial Planning Objectives - Support 2.1 We support the WDC’s Spatial Planning Objectives (SPO1 – SP15). We consider the Objectives promote sustainable growth and strike an appropriate balance to accommodate that growth given the environmental and infrastructure requirements of the District. The Objectives will support Wealden’s aspiration to retain its rural character and high quality environment whilst achieving sufficient growth to support its economy, regenerate market towns and tackle deprivation. 2.2 To meet the ‘justified’ test of soundness, “the most appropriate strategy when considered against reasonable alternatives” needs to be explored. PPS12 expands on this further: ‘the ability to demonstrate that the plan is the most appropriate when considered against reasonable alternatives delivers confidence in the strategy. It requires the local planning authority to seek out and evaluate reasonable alternatives promoted by themselves and others to ensure that they bring forward those alternatives which they consider the LPA should evaluate as part of the plan making process. There is no point in inventing alternatives if they are not realistic. Being able to demonstrate that the plan is the most appropriate having gone through an objective process of assessing alternatives will pay...
dividends in terms of easier passage for the plan through the examination process. It will assist in evaluating the claims of those who wish to oppose the strategy.’ (PPS12, para 4.38 – PPS12’s own emphasis shown in italics)

2.3 In order to provide for a suitable strategy that strikes the right balance, WDC has prepared an extensive Evidence Base which identifies and assesses the various options available to WDC. These options are reviewed within the Background Papers (BP), in particular, BP1: Development of the Proposed Submission Core Strategy (section 5) and BP10: Sustainability Appraisal of Proposed Submission Core Strategy (Table 1.2). The Background Papers demonstrate the ‘appropriateness’ of the current proposed strategy, that ‘reasonable alternatives’ have been tested and that the Spatial Planning Objectives are found on ‘robust evidence’ i.e. the visions are ‘justified’ as required by PPS12. 2.4 The previous Spatial Development Options (June 2009) Consultation tested up to six different housing scenarios to accommodate the South East Plan (May 2009) housing target. In the light of the revocation of the RSS paragraphs 5.9 and 5.10 of BP1: Development of the Proposed Submission Core Strategy set out the steps which were addressed in determining the overall revised quantum of growth and the suitability of the proposed locations to accommodate this growth: ‘The Local Strategic Partnership focused upon meeting housing needs across the District, whilst Parish and Town Council’s within Wealden provided information on local growth issues and preferences’. This is further explored in paragraphs 5.11 – 5.37 and Section 7 of BP1: Development of the Proposed Submission Core Strategy including an assessment of the settlement hierarchy. 2.5 Section 8 of BP1: Development of the Proposed Submission Core Strategy is supported by section 8 of BP10: Sustainability Appraisal of Proposed Submission Core Strategy which in turn supports the Spatial Planning Objectives within the Core Strategy. The Options tested are considered realistic and are not ‘artificial’ as set out in paragraph 38 of PINS ‘Learning From Experience’ (Sept 2009) document, which states, ‘in some instances it appears that options are identified for the sake of having options rather than because they are realistic….if the options are limited there is no point in trying to artificially create them’. 2.6 The Spatial Planning Objectives therefore provide a clear vision and are specific to the challenges of the District. They are supported by the Evidence Base which has a clear audit trail, has tested all the reasonable alternatives and is therefore ‘justified’. Furthermore, the Objectives are consistent with National Policy including ‘emerging’ National Guidance contained in the Localism Bill (i.e. the level of housing has been determined by a locally derived need).

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**Representation ID**

1258

**Person ID** Mr Webster

**Agent ID**

534840

**Box 3**

Sound [ ] Yes [x] No [ ] Justified [ ] Effective [x] Consistent with national policy

Legally Compliant [x] Yes [ ] No

**Details of Reasons for Soundess/ Legal Complaince:**

SP02 Currently states that the intrinsic quality of the historic environment is to be "protected". This language, and the resultant policy test, does not conform with that in Planning Policy Statement 5 "Planning for the Historic Environment" (PPS5). PPS5 states in paragraphs 6, 7 and HE3.1 that the historic environment and its heritage assessets are to be "conserved".

**Details of Changes to be Made:**

The reference in SPO2 to the historic environment being "protected" should be replaced with "conserved". This will make the objective compliant with national guidance.

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**Representation ID**

1313

**Person ID** Mr Ankers

**Agent ID**

106660

**South Downs Society**

**Box 3**

Sound [x] Yes [ ] No [ ] Justified [ ] Effective [ ] Consistent with national policy

Legally Compliant [ ] Yes [x] No

**Details of Reasons for Soundess/ Legal Complaince:**

We generally support all 15 of the Spatial objectives but SPO1 (countryside and rural areas) should make specific mention of the downs.

**Details of Changes to be Made:**
Representation ID
1524
Person ID  Mrs  Rudin  Agent ID
105986  Forest Row Parish Council  Box 3
Sound  ☐ Yes  ☑ No  ☐ Justified  ☐ Effective  ☐ Consistent with national policy
Legally Compliant  ☐ Yes  ☐ No
Details of Reasons for Soundess/ Legal Compliance:
Concern in the application of spatial planning objective to Forest Row
Details of Changes to be Made:

Representation ID
130
Person ID  Mes  Gribble  Agent ID  Mr  Courtley
106087  102476  Box 4
Sound  ☐ Yes  ☑ No  ☑ Justified  ☑ Effective  ☑ Consistent with national policy
Legally Compliant  ☐ Yes  ☑ No
Details of Reasons for Soundess/ Legal Compliance:
The Housing Figures should accord with the evidence based housing numbers approved following public examination proposed by the RSS ie 550 dwellings per annum. The figure for 2006-2030 should be nearer the 13200 figure.
Details of Changes to be Made:
Changes to accord with up to date, robust evidence on population info, migration, immigration and household formation not just within its own district but regionally. to ensure the objectives of PPS3 are achieved.
Summary of all Representations - Proposed Submission Core Strategy Regulation 27 - Report 11th July 2011

Representation ID
84

Person ID  Ms  Van-Gils
Agent ID  Mr  Court
336229      519713

Box 4

Sound  ☑ Yes  ☑ No  ☑ Justified  ☑ Effective  ☑ Consistent with national policy
Legally Compliant  ☑ Yes  ☑ No

Details of Reasons for Soundess/ Legal Complaince:
Local authorities are required to produce their Core Strategies in accordance with the Regional Spatial Strategies - which in this instance is the South East Plan. That document required Wealden Council, inter alia, to make provision for an additional 11,000 dwellings over the period 2006 - 2026, at an average rate of 550 dwellings during the years 2006 - 2030 at 400 dpa is therefore completely at odds with the RSS. As it stands, therefore, the policy is unsound. A substantial increase is thus required to rectify this situation. It is surprising that the Core Strategy does not refer to the RSS or government policy in its explanatory text. Whilst it is acknowledges that it is the governments intention to abolish Regional Spatial Strategic, that event has not take place. Furthermore, it is not beyond the bounds of possibility that the government could change its mind on this matter. The starting point for the Council's strategic housing provision is thus the RSS and its policy for the delivery of 11,000 dwellings in the period 2006 - 2026. whilst the proposal to cover the years to 2030 in this Core Strategy is welcomed, it is contended that the housing provision should be at the rate of 550 dpa unless material considerations indicate otherwise. In this context it is interesting to see that in paragraph 3.10 the Council states that trend-based projections show an increase in population in Wealden from 2006 - 2030 of around 19,000 persons, which itself equates to around 16,800 households. If that is the case - and that forecast is not being challenged in this response, - then, with an allowance for vacancies of 3%, some 17,300 additional dwellings will be required. The Council's vision statement in paragraph 4.1 that "by 2030 Wealden will have successfully accommodated growth to meet future needs...." is therefore welcomed. However, this is in sharp contrast with the statement in paragraph 3.10 relating to the trend - based projection of around 16,800 households that this "shows the demand for both market and affordable housing is high, and in excess of that which could be accommodated or delivered in Wealden." The Council's housing policy thus appears to be based upon its unwillingness to meet the requirements in the RSS or those emanating from other projections. Indeed, the statement in paragraph 3.10 that the housing demands cannot be accommodated is not justified in any way at all. As it stands, the policy is unsound. It is also contrary to the very basis of sustainability which required today's needs to be met. This policy does no such thing. In order to put matters right, provision needs to be made for some 17,300 additional dwellings in the plan period. This should largely be in the form of extensions to existing towns and villages, together with infilling where it does not have a detrimental effect upon its surroundings.

Details of Changes to be Made:

Representation ID
40

Person ID  Mr  Courtley
Agent ID  Mr  Courtley
513493      102476

Sound  ☑ Yes  ☑ No  ☑ Justified  ☑ Effective  ☑ Consistent with national policy
Legally Compliant  ☑ Yes  ☑ No

Details of Reasons for Soundess/ Legal Complaince:
The Housing figure should accord the evidenced based housing number proposed by the RSS ie 550 per annum. The housing figure for 2006-2030 should be 13200.

Details of Changes to be Made:
To accord with upto date robust evidence on population information, migration, immigration and household formation.

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Representations

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<tr>
<td>1188</td>
<td>Mrs Kelly</td>
<td>534595</td>
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<tr>
<td>1182</td>
<td>Miss Heron</td>
<td>534582</td>
</tr>
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**Representation ID 1188**

**Person ID** Mrs Kelly  
**Agent ID** 534595  
**Box** 4  
**Sound** ☐ Yes ☐ No ☐ Justified ☑ Effective ☐ Consistent with national policy  
**Legally Compliant** ☐ Yes ☐ No  
**Details of Reasons for Soundess/ Legal Complaince:**

Rydon supports the focus for development at Stone Cross as a suitable location to accommodate growth in the form of sustainable extensions. This will help to provide a mix of new housing and delivery relevant infrastructure improvements.

**Details of Changes to be Made:**

Yes

**Representation ID 1182**

**Person ID** Miss Heron  
**Agent ID** 534582  
**Box** 4  
**Sound** ☐ Yes ☑ No ☑ Justified ☑ Effective ☑ Consistent with national policy  
**Legally Compliant** ☐ Yes ☐ No  
**Details of Reasons for Soundess/ Legal Complaince:**

There is no justification within the evidence base to limit growth in a town that is capable of accommodating sustainable growth despite being surround by AONB. The deliverability of only 160 additional homes to Heathfield over the next 19 years is not sufficient to address the local need for general market housing and the acute need for affordable homes.

**Details of Changes to be Made:**

Direct greater growth to Heathfield. Due to its importance as a local service centre it is essential that sufficient allocations are identified in order to wide local housing choice to meet local needs. It is also imperative for the vitality and viability of the town.
1.1 The Amount of New Housing – Policy WCS1 and WCS2 and paragraphs 5.3 etc. 1.1.1 We note that the proposed Submission Core Strategy looks to accommodate 9574 new dwellings in the district across the plan period (2006 – 2030) i.e. 399 a year. This is circa 27.5% less than the 11,000 dwellings proposed across the district in the South East Plan (SEP) (May 2009) for the period 2006 and 2026. 1.1.2 PPS12 requires Core Strategies to conform generally to the regional policy. We do not consider the amount of new housing proposed in the district to be legally compliant as it is not consistent with regional policy as set out in the SEP. 1.1.3 Whilst the LPA appear to be progressing with a lower level of growth on the assumption that the SEP will be revoked by the time the Core Strategy gets to examination, the fact is the SEP remains part of the development plan at present and the CS should have regard to the aims and objectives of the SEP/ justify why it is necessary and appropriate to depart from it. The proposed Submission Core Strategy contains no such justification. 1.1.4 A detailed understanding of the background to the amount of new housing proposed in the district in the SEP is in our opinion important in considering the soundness of the housing land supply strategy now being advocated in the proposed Submission Core Strategy document. 1.1.15 The Chief Planning Officer (CPO) in his letter of the 6th July made it clear that in the context of the revocation of the RSS LPAs would be responsible for determining the housing numbers in the absence of a regional target, and that the housing numbers promoted by LPAs would need to be justified, as LPAs would need to defend them through the LDF examination process. 1.1.19 The District Council has an obligation to assess and provide for the housing needs and demands of the District. Paragraph 33 of PPS3 makes it very clear that in determining local levels of housing provision local planning authorities should, in preparing their Core Strategies take into account evidence of current and future levels of housing need and demand, e.g. as set out in Housing Market Assessment and the Housing Needs Assessment. 1.1.22 Having regard to the above we feel the DC should give consideration to the accommodation of at least 13,200 (i.e. the 11,000 set out in the SEP plus 4 x 550) to cover the additional years to 2030). Given the 4,889 units are already committed this would leave a residual requirement of 8,311 i.e. a residual requirement equivalent to 415 dwellings pa. If, 75% of the 13,200 units were on sites that generated an affordable housing need under the new policy WCS8, this level of provision could provide for circa 3,465 affordable dwellings i.e. 18% of the affordable need identified in the HNA. Which demonstrates how severe the need is relative to the supply. 1.1.23 WDC’s aversion to higher housing numbers appears to be related to the effect these could have on infrastructure and services, especially in the southern part of the district. However, it is often the case that the strategic housing allocations help to address this issue, providing new transport links/highway improvements, contributing to new sustainable drainage facilities, new schools, medical facilities etc. Higher levels of growth need not prejudice existing infrastructure and services; they could in fact help address existing problems. 1.2 Housing Distribution 1.2.1 We do not consider the housing distribution strategy to be legally compliant. It is not consistent with regional policy as set out in the SE. PPS12 requires Core Strategies to conform generally to the regional policy. Paragraph 4.33 states that choices to be made on where growth should take place should follow national and regional policy. 1.2.2 The southern part of Wealden district is located within the Sussex Coast Sub Region, one of the nine sub regions identified in the SEP. These sub regions were to be ‘the focus for growth and regeneration’. Policy SP1 of the SEP refers 1.2.3 Policy H1 of the SEP deals with regional housing provision. It stipulates that in the Sussex Coast Sub Region, 69,300 net additional dwellings should be provided between 2006 and 2026. 1.2.4 Policy SCT5 of the SEP sets out the scale and distribution of housing across the Sussex Coast sub region. It indicates that that part of Wealden District which falls within the Sussex Coast Sub Region should seek to accommodate 7000 dwellings during the plan period (2006 – 2026) i.e. 350 dwellings per annum. 1.2.5 Given the above, and having regard to the requirements of policy H1b of the SEP (wherein WDC are required to provide some 11,000 units across the district during the plan period (2006-2026)), it is clear that the SEP looks to focus growth within that part of the district that falls within the Sussex Coast Sub Region, with only a small proportion of development (4000 homes) to be accommodated within what was called the Rest of the District. 1.2.6 The SEP also makes it clear that the Sussex Coast Sub Region was identified as an area where the government was looking to proactively pursue and promote economic growth and regeneration. As a result over 60% of WDC’s housing requirement was located within the Sussex Coast Sub Region. The spatial strategy being promoted in the proposed Submission Core Strategy document is, according to paragraph 5.5 of the proposed Submission Core 493/A3/JA April 2011 Strategy document, predicated upon the strategy objectives and the settlement hierarchy. Thus only circa 51% of the proposed level of housing growth is to be located within what was referred to as the Sussex Coast Sub Region in the SEP. 1.2.7 Not only is the spatial strategy inconsistent with the SEP, but it fails to take on board the reason for
the spatial strategy proposed in the SEP i.e. the economic regeneration of the Sussex coastal area. WDC have, in their sustainability appraisal of the proposed Submission Core Strategy Document failed to assess the implications of the spatial strategy advocated in the proposed Submission Core Strategy Document on the economic regeneration of the Sussex coastal area. The council's failure to undertake this work means that the proposed Submission Core Strategy Document is not soundly based. 1.2.9 In promoting an annual housing requirement of just 400 units WDC, in their proposed Submission Core Strategy document, are in our opinion actively stifling economic growth. Furthermore, the council's decision to treat the whole district as a single entity, with no emphasis placed on the regeneration of the Sussex Coast Sub Region, is in our opinion, despite the aspirations of policies SP03, 04 and 06, actively prejudicing the economic regeneration of the coastal area, to the detriment of the wider area. 1.2.11 As currently drafted the housing distribution strategy advocated by WDC in their Proposed Submission Core Strategy is not in ‘general conformity’ with the RSS as required by Paragraph 4.2 and 4.33 of PPS12 and is not therefore sound.

Details of Changes to be Made:

3.1 The Amount of New Housing:- 3.1.1 We feel the housing targets set out in policy WCS1 should have regard to our position on the scale of housing growth be amended from 9600 to 13,200 dwellings. 3.1.2 Similarly we feel the housing targets set out in policy WCS2 of the CS should, having regard to our position on the scale of housing growth, the spatial strategy, and the level of housing proposed in Stone Cross specifically, be amended thus:- WCS2 Distribution of Housing Growth 2006 – 2030 Town/ settlement Stone Cross and Westham 42 Built or already committed - 980 New allocations; total dwellings 2006 - 2030 1,022. Total Wealden 4,889 Built or already committed; 8,311 new allocations; 13,200 Total Dwellings 2006 - 2030. 3.1.3 We would also suggest that the number of new allocations is revised to ensure that 60% of the proposed growth is located in the Sussex Coast Sub Region, as per the SEP, which should be identified on a plan. 3.1.4 Having regard to the above there would also be a need to amend policy SPO3 to address the increase in housing supply we advocate, and the reinstatement of the Sussex Coast Sub Region. Similarly paragraphs 3.11 and 3.16 would need to be revised to reflect our position, with the economic policies (SPO6 and WSC3 reviewed accordingly). 3.1.5 If the scale of housing proposed during the plan period is not revised as recommended, we would suggest that policy WCS2 is revised thus:- WCS2 Distribution of Housing Growth 2006 – 2030 Town/ settlement Stone Cross and Westham 42 Built or already committed - 850 New allocations; total dwellings 2006 - 2030 892. Total Wealden 4,889 Built or already committed; 4,835 new allocations; 9,724 Total Dwellings 2006 - 2030. 3.1.6 Given our recommended changes to the scale of growth proposed at Stone Cross and Westham we would also recommend that paragraph 6.31 (3) and paragraph 6.31 (3 bullet points 3, and 4 be amended thus:- ‘allocating a range of deliverable housing sites for up to 700 dwellings, and leisure, recreation and community facilities in Polegate and Willingdon, around 850 dwellings in Stone Cross, with some 16,890 sq. metres employment floorspace in the Polegate and Willingdon area. Sites for development will be identified and phased through the Site Allocation DPDs including: · provision of around 550 homes within an extension to the urban area of Stone Cross to the east and south east (SD6), with flexibility between SD6 and SD7, subject to highway improvements; · provision of around 300 homes within an extension to the urban area of Stone Cross to the north (SD7), with flexibility between SD6 and SD7, subject to highway improvements’

Representation ID
828

Person ID     Mr & Flittner

Agent ID      106034

Box 4

Sound  ☐ Yes  ☑ No  ☑ Justified  ☑ Effective  ☑ Consistent with national policy

Legally Compliant  ☐ Yes  ☐ No

Details of Reasons for Soundess/ Legal Complaince:
The housing provision is too low as set out in the objectors detailed submissions. As equally most of the sites/area are undeliverable or unsustainable.

Details of Changes to be Made:
Any changes made to the CS due to objections will need to be reflected in the wording of this spatial planning objective
Details of Reasons for Soundess/ Legal Complaince:
It is suggested that the focus for development in the other major centres in the District to the exclusion of Crowborough is not justified by evidence - which tends to favour a more equitable approach. In particular, the statements contained within the Town Council's vision document Top of the Weal would indicate that Crowborough town centre is in particular need of regeneration that would struggle to be delivered by the level of development currently proposed. To constrain development in this location risks not achieving the overaching vision of the Core Strategy (*set out at Para 4.1) or indeed the objectives of Policy SP04

Details of Changes to be Made:
In the light of this submission we would like to see SP03 re written as follows: To meet the needs of the population of Wealden and for Wealden to meet its role in providing housing in the South East of England, which protection the environment, the Core Strategy will seek to provide 2,500 between 2006 and 2030. The delivery of these homes will be dependent on the delivery of developable sites and market conditions. Over the whole of the 24 plans the average provision of 520 dwellings per year will be sort and monitored. The provision of social and physical infrastructure will be as far as possible provided in conjuction with the development proposed. Funding for such provision will be sent from all sources including the housing development itself. The of the development shall be in accord with the Spatial Strategy of the...
Details of Reasons for Soundness/ Legal Compliance:
Stone Cross is not a sustainable location for future housing development of such a scale to be considered a strategic location. Its inclusion as a location for strategic allocations of housing is inconsistent with SP04, SP06 and SP07 and would not as a matter of fact stimulate investment in the centre given Stone Cross does not benefit from any employment land or a designated centre.

Details of Changes to be Made:
Delete reference to Stone Cross

Details of Reasons for Soundness/ Legal Compliance:
We generally support all 15 of the Spatial objectives but SPO1 (countryside and rural areas) should make specific mention of the downs.

Details of Changes to be Made:
Vision and Spatial Planning Objectives - Support 2.1 We support the WDC’s Spatial Planning Objectives (SPO1 – SP15). We consider the Objectives promote sustainable growth and strike an appropriate balance to accommodate that growth given the environmental and infrastructure requirements of the District. The Objectives will support Wealden’s aspiration to retain its rural character and high quality environment whilst achieving sufficient growth to support its economy, regenerate market towns and tackle deprivation. 2.2 To meet the ‘justified’ test of soundness, “the most appropriate strategy when considered against reasonable alternatives” needs to be explored. PPS12 expands on this further: ‘the ability to demonstrate that the plan is the most appropriate when considered against reasonable alternatives delivers confidence in the strategy. It requires the local planning authority to seek out and evaluate reasonable alternatives promoted by themselves and others to ensure that they bring forward those alternatives which they consider the LPA should evaluate as part of the plan making process. There is no point in inventing alternatives if they are not realistic. Being able to demonstrate that the plan is the most appropriate having gone through an objective process of assessing alternatives will pay dividends in terms of easier passage for the plan through the examination process. It will assist in evaluating the claims of those who wish to oppose the strategy.’ (PPS12, para 4.38 – PPS12’s own emphasis shown in italics) 2.3 In order to provide for a suitable strategy that strikes the right balance, WDC has prepared an extensive Evidence Base which identifies and assesses the various options available to WDC. These options are reviewed within the Background Papers (BP), in particular, BP1: Development of the Proposed Submission Core Strategy (section 5) and BP10: Sustainability Appraisal of Proposed Submission Core Strategy (Table 1.2). The Background Papers demonstrate the ‘appropriateness’ of the current proposed strategy, that ‘reasonable alternatives’ have been tested and that the Spatial Planning Objectives are found on ‘robust evidence’ i.e. the visions are ‘justified’ as required by PPS12. 2.4 The previous Spatial Development Options (June 2009) Consultation tested up to six different housing scenarios to accommodate the South East Plan (May 2009) housing target. In the light of the revocation of the RSS paragraphs 5.9 and 5.10 of BP1: Development of the Proposed Submission Core Strategy set out the steps which were addressed in determining the overall revised quantum of growth and the suitability of the proposed locations to accommodate this growth: ‘The Local Strategic Partnership focused upon meeting housing needs across the District, whilst Parish and Town Council’s within Wealden provided information on local growth issues and preferences’. This is further explored in paragraphs 5.11 – 5.37 and Section 7 of BP1: Development of the Proposed Submission Core Strategy including an assessment of the settlement hierarchy. 2.5 Section 8 of BP1: Development of the Proposed Submission Core Strategy is supported by section 8 of BP10: Sustainability Appraisal of Proposed Submission Core Strategy which in turn supports the Spatial Planning Objectives within the Core Strategy. The Options tested are considered realistic and are not ‘artificial’ as set out in paragraph 38 of PINS ‘Learning From Experience’ (Sept 2009) document, which states, ‘in some instances it appears that options are identified for the sake of having options rather than because they are realistic….if the options are limited there is no point in trying to artificially create them’. 2.6 The Spatial Planning Objectives therefore provide a clear vision and are specific to the challenges of the District. They are supported by the Evidence Base which has a clear audit trail, has tested all the reasonable alternatives and is therefore ‘justified’. Furthermore, the Objectives are consistent with National Policy including ‘emerging’ National Guidance contained in the Localism Bill (i.e. the level of housing has been determined by a locally derived need). Details of Changes to be Made:

Vision and Spatial Planning Objectives - Support 2.1 We support the WDC’s Spatial Planning Objectives (SPO1 – SP15). We consider the Objectives promote sustainable growth and strike an appropriate balance to accommodate that growth given the environmental and infrastructure requirements of the District. The Objectives will support Wealden’s aspiration to retain its rural character and high quality environment whilst achieving sufficient growth to support its economy, regenerate market towns and tackle deprivation. 2.2 To meet the ‘justified’ test of soundness, “the most appropriate strategy when considered against reasonable alternatives” needs to be explored. PPS12 expands on this further: ‘the ability to demonstrate that the plan is the most appropriate when considered against reasonable alternatives delivers confidence in the strategy. It requires the local planning authority to seek out and evaluate reasonable alternatives promoted by themselves and others to ensure that they bring forward those alternatives which they consider the LPA should evaluate as part of the plan making process. There is no point in inventing alternatives if they are not realistic. Being able to demonstrate that the plan is the most appropriate having gone through an objective process of assessing alternatives will pay...
dividends in terms of easier passage for the plan through the examination process. It will assist in evaluating the claims of those who wish to oppose the strategy.’ (PPS12, para 4.38 – PPS12’s own emphasis shown in italics)

2.3 In order to provide for a suitable strategy that strikes the right balance, WDC has prepared an extensive Evidence Base which identifies and assesses the various options available to WDC. These options are reviewed within the Background Papers (BP), in particular, BP1: Development of the Proposed Submission Core Strategy (section 5) and BP10: Sustainability Appraisal of Proposed Submission Core Strategy (Table 1.2). The Background Papers demonstrate the ‘appropriateness’ of the current proposed strategy, that ‘reasonable alternatives’ have been tested and that the Spatial Planning Objectives are found on ‘robust evidence’ i.e. the visions are ‘justified’ as required by PPS12.

2.4 The previous Spatial Development Options (June 2009) Consultation tested up to six different housing scenarios to accommodate the South East Plan (May 2009) housing target. In the light of the revocation of the RSS paragraphs 5.9 and 5.10 of BP1: Development of the Proposed Submission Core Strategy set out the steps which were addressed in determining the overall revised quantum of growth and the suitability of the proposed locations to accommodate this growth: ‘The Local Strategic Partnership focused upon meeting housing needs across the District, whilst Parish and Town Council’s within Wealden provided information on local growth issues and preferences’. This is further explored in paragraphs 5.11 – 5.37 and Section 7 of BP1: Development of the Proposed Submission Core Strategy including an assessment of the settlement hierarchy. 2.5 Section 8 of BP1: Development of the Proposed Submission Core Strategy is supported by section 8 of BP10: Sustainability Appraisal of Proposed Submission Core Strategy which in turn supports the Spatial Planning Objectives within the Core Strategy. The Options tested are considered realistic and are not ‘artificial’ as set out in paragraph 38 of PINS ‘Learning From Experience’ (Sept 2009) document, which states, ‘in some instances it appears that options are identified for the sake of having options rather than because they are realistic….if the options are limited there is no point in trying to artificially create them’. 2.6 The Spatial Planning Objectives therefore provide a clear vision and are specific to the challenges of the District. They are supported by the Evidence Base which has a clear audit trail, has tested all the reasonable alternatives and is therefore ‘justified’. Furthermore, the Objectives are consistent with National Policy including ‘emerging’ National Guidance contained in the Localism Bill (i.e. the level of housing has been determined by a locally derived need).
We are intrigued by the Council's intended adoption of an unsound housing position. The Council’s proposals for the provision of housing development during the period 2006 – 2030 demonstrate that the Council’s Local Development Framework Document is not in conformity with the Regional Spatial Strategy, which forms part of the Development Plan. Paragraph 3.3 of the Council’s Background Paper no. 1 (BP1) states “Current legislation requires that the Core Strategy is in general conformity with the Regional Spatial Strategy, the South East Plan” (SEP), which was adopted in May 2009. In paragraph 3.3 of BP1, the Council also acknowledge that “The South East Plan requires that at least 11,000 dwellings is provided in Wealden District between 2006 and 2026”. The SEP (Policy H1) requires 11,000 new dwellings to be provided in Wealden District between 2006 and 2026, equal to an overall annual requirement of 550 per year. Paragraph 3.3 of the Council’s BP1 states “Because of existing planning permissions and houses that have already been built since 2006, overall we need to find locations for a total of approximately 7,000 new houses between now and 2026”. Assuming 550 dwellings per year based on the SEP housing requirement, extending the PSCS DPD end date to 2030 (i.e. 4 more years) would require an additional 2,200 dwellings, bringing this total to the equivalent of 9,200 dwellings between 2006 and 2030. Policy WCS2 indicates that 4,889 dwellings are already committed (through planning permissions, commencements etc.) as at 1st April 2010. Set against the SEP requirement, this would leave a residual requirement for 6,111 dwellings up to 2026 (i.e. 11,000 minus 4,889) and if the SEP requirement were to be extended by 4 years up to 2030 (at 550 dwellings per year i.e. a total of 2,200 dwellings), this would create a total residual requirement of 8,311 additional dwellings by 2030. This residual requirement is the equivalent of 415 dwellings per annum during the remaining 20 year period between April 2010 and April 2030. By contrast, draft Policy WCS1 provides for a total provision of 9,600 dwellings between 2006 and 2030. Taking account of 4,889 dwelling commitments, this leaves only 4,711 new dwellings during the remaining 20 year period. This is the equivalent of only 230 dwellings per year (i.e. just over half that implied by extending the annual housing requirement set out in Policy H1 of the SEP to 2030). In draft Policy WCS2, the 9,600 dwelling figure referred to in draft Policy WCS1 has a total of 9,574 dwellings during the same 2006 – 2030 time period. The Council has not provided any justification for failing to comply with the housing requirements set out in SEP and no justification has been provided as to how the seemingly speculative figure of 9,600 dwellings or 9,574 dwellings has been arrived at for the housing requirement during the period 2006 – 2030 in draft Policies WSC1 and WSC2. As the council are aware there have been a number of recent announcements regarding the emerging Localism Bill and the changes being sought by the Government and we have looked to deal with these within our comments. As the Council is aware, Section 19 of the Planning and Compulsory Purchase Act 2004 (as amended) deals with the Preparation of local development documents. Section 19(2) specifically states that: “In preparing a Development Plan Document or any other local development document the local planning authority must have regard to (a) national policies and advice contained in guidance issued by the Secretary of State; (b) the RSS for the region in which the area of the authority is situated, if the area is outside Greater London”; (h) any other local development document which has been adopted by the authority”. The adopted South East Plan therefore remains part of the development plan and whatever the Council believes cannot be used as a reason for not complying with 19(2)(b) as this is a statutory requirement. This is particularly true bearing in mind recent appeal decisions, which confirm the status of the RSS’s and the limited weight that can be attributed at this time to the emerging Localism Bill. Accordingly any DPD that appears prior to enactment of the Localism Bill which materially departs from the RSS must be found unsound given that it would not comply with statute, particularly given the Governments recent announcement that an Environmental Assessment will now be carried out to consider the removal of the RSS’s. By any reasonable standard, this is likely to take a long period of time and it is therefore fair to assume the RSS’s will remain as part of the development plan for a good period to come. Nonetheless, even ignoring the above the Government remains committed to the delivery of more housing and it therefore seems perverse for the council to be attempting to adopt a strategy which seeks to reduce what should be recognised at the very least, as a minimum housing requirement. It is clear from all the above therefore that the RSS remains in law as part of the development plan and cannot be ignored, as the council appears to be seeking to do. We also refer the council back to the founding principles of the emerging local development framework. For example PPS 12 confirms that the Core Strategies; “4.36 Core strategies must be justifiable: they must be: • founded on a robust and credible evidence base; and • the most appropriate strategy when considered against the reasonable alternatives”. We question whether the council’s unjustified Housing Growth figures meet this simple test as presently emerging and we maintain therefore that the Councils emerging Core Strategy is not only deficient because it ignores the
adopted RSS, but it also not founded on the most up to date evidence base. Perhaps, however most importantly we draw the council’s attention to the evidence base it has at its disposal and indeed comments it makes in supporting documents for this Core Strategy. Paragraph 5.3 of the “Managing the Delivery of Housing Background Paper” – Background Paper 2 notes that “the Council’s Housing Needs Assessment highlights the acute level of affordable housing need within the District and it is noted that the main means of achieving affordable housing delivery is by the means of the construction of market housing…” Paragraph 6.11 of the same document goes onto confirm that “on this basis, the assessment has identified an annual affordable housing need of 812 in Wealden”. On the basis that the delivery of affordable housing, as accepted by the Council is predicated on the delivery of market accommodation, the evidence supports a much higher level of growth than that envisaged by paragraphs 3.8 – 3.17 and more importantly policies WCS1 and WCS2 of the consultation document. Indeed, it is obvious from the above that a target of 4,685 new homes over the period 2006 – 2026 is neither robust or indeed accurate and would continue to exacerbate the ongoing chronic housing deficiencies in the district. Furthermore, paragraph 3.22 of BP1 is of course, wholly misleading as it compares housing target figures that relate to two different time periods. The 11,000 dwellings target relates to the housing requirement set out in SEP between the period 2006 and 2026 (i.e. equal to 550 dwellings per annum), whereas the Council’s reduced figure of 9,600 dwellings relates to an extended 4 year period between 2006 – 2030 which would be the equivalent of 400 dwellings per annum (i.e. a reduction of 150 dwellings per annum over the entire Plan period compared to the SEP). Thus, not only is the PSCS DPD not legally compliant in failing to be in accordance with the Development Plan (or its time period), but also it is not sound, as no satisfactory justification has been provided for the substantial reduction in the housing period and over an extended plan period. Moreover, no justification has been made as to why the council fails to take on board the evidence which clearly supports a higher housing provision than that proposed within the adopted RSS, particularly taking on board the Governments growth agenda.

Details of Changes to be Made:
We therefore suggest that the submitted Core strategy needs to be amended to take into the account the extant development plan, including the South East Plan’s housing target at the very least, but with a recognition for a higher level of growth should be planned for. At the very least therefore, there needs to be a larger degree of flexibility built into the document. Whilst the Council has within paragraphs 5.18 – 5.20, as well as policy WCS5 sought to provide a contingency within the document, this does not go far enough and needs to be far more robust to take account, as indentified above of the chronic affordable housing issues that exist within the District.
We are intrigued by the Councils intended adoption of an unsound housing position. The Council’s proposals for the provision of housing development during the period 2006 – 2030 demonstrate that the Council’s Local Development Framework Document is not in conformity with the Regional Spatial Strategy, which forms part of the Development Plan. Paragraph 3.3 of the Council’s Background Paper no. 1 (BP1) states “Current legislation requires that the Core Strategy is in general conformity with the Regional Spatial Strategy, the South East Plan” (SEP), which was adopted in May 2009. In paragraph 3.3 of BP1, the Council also acknowledge that “The South East Plan requires that at least 11,000 dwellings is provided in Wealden District between 2006 and 2026”. The SEP (Policy H1) requires 11,000 new dwellings to be provided in Wealden District between 2006 and 2026, equal to an overall annual requirement of 550 per year. Paragraph 3.3 of the Council’s BP1 states “Because of existing planning permissions and houses that have already been built since 2006, overall we need to find locations for a total of approximately 7,000 new houses between now and 2026”. Assuming 550 dwellings per year based on the SEP housing requirement, extending the PSCS DPD end date to 2030 (i.e. 4 more years) would require an additional 2,200 dwellings, bringing this total to the equivalent of 9,200 dwellings between 2006 and 2030. Policy WCS2 indicates that 4,889 dwellings are already committed (through planning permissions, commencements etc.) as at 1st April 2010. Set against the SEP requirement, this would leave a residual requirement for 6,111 dwellings up to 2026 (i.e. 11,000 minus 4,889) and if the SEP requirement were to be extended by 4 years up to 2030 (at 550 dwellings per year i.e. a total of 2,200 dwellings), this would create a total residual requirement of 8,311 additional dwellings by 2030. This residual requirement is the equivalent of 415 dwellings per annum during the remaining 20 year period between April 2010 and April 2030. By contrast, draft Policy WCS1 provides for a total provision of 9,600 dwellings between 2006 and 2030. Taking account of 4,889 dwelling commitments, this leaves only 4,685 new dwellings during the remaining 20 year period. This is the equivalent of only 230 dwellings per year (i.e. just over half that implied by extending the annual housing requirement set out in Policy H1 of the SEP to 2030). In draft Policy WCS2, the 9,600 dwelling figure referred to in draft Policy WCS1 has a total of 9,574 dwellings during the same 2006 – 2030 time period. 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Section 19(2) specifically states that: “In preparing a Development Plan Document or any other local development document the local planning authority must have regard to (a) national policies and advice contained in guidance issued by the Secretary of State; (b) the RSS for the region in which the area of the authority is situated, if the area is outside Greater London”; (h) any other local development document which has been adopted by the authority”. The adopted South East Plan therefore remains part of the development plan and whatever the Council believes cannot be used as a reason for not complying with 19(2)(b) as this is a statutory requirement. This is particularly true bearing in mind recent appeal decisions, which confirm the status of the RSS’s and the limited weight that can be attributed at this time to the emerging Localism Bill. Accordingly any DPD that appears prior to enactment of the Localism Bill which materially departs from the RSS must be found unsound given that it would not comply with statute, particularly given the Governments recent announcement that an Environmental Assessment will now be carried out to consider the removal of the RSS’s. By any reasonable standard, this is likely to take a long period of time and it is therefore fair to assume the RSS’s will remain as part of the development plan for a good period to come. Nonetheless, even ignoring the above the Government remains committed to the delivery of more housing and it therefore seems perverse for the council to be attempting to adopt a strategy which seeks to reduce what should be recognised at the very least, as a minimum housing requirement. It is clear from all the above therefore that the RSS remains in law as part of the development plan and cannot be ignored, as the council appears to be seeking to do. We also refer the council back to the founding principles of the emerging local development framework. For example PPS 12 confirms that the Core Strategies; “4.36 Core strategies must be justifiable: they must be: • founded on a robust and credible evidence base; and • the most appropriate strategy when considered against the reasonable alternatives”. We question whether the council’s unjustified Housing Growth figures meet this simple test as presently emerging and we maintain therefore that the Councils emerging Core Strategy is not only deficient because it ignores the
adopted RSS, but it also not founded on the most up to date evidence base. Perhaps, however most importantly we draw the council’s attention to the evidence base it has at its disposal and indeed comments it makes in supporting documents for this Core Strategy. Paragraph 5.3 of the “Managing the Delivery of Housing Background Paper” – Background Paper 2 notes that “the Councils Housing Needs Assessment highlights the acute level of affordable housing need within the District and it is noted that the main means of achieving affordable housing delivery is by the means of the construction of market housing...” Paragraph 6.11 of the same document goes onto confirm that “on this basis, the assessment has identified an annual affordable housing need of 812 in Wealden”. On the basis that the delivery of affordable housing, as accepted by the Council is predicated on the delivery of market accommodation, the evidence supports a much higher level of growth than that envisaged by paragraphs 3.8 – 3.17 and more importantly policies WCS1 and WCS2 of the consultation document. Indeed, it is obvious from the above that a target of 4,685 new homes over the period 2006 – 2026 is neither robust or indeed accurate and would continue to exacerbate the ongoing chronic housing deficiencies in the district. Furthermore, paragraph 3.22 of BP1 is of course, wholly misleading as it compares housing target figures that relate to two different time periods. The 11,000 dwellings target relates to the housing requirement set out in SEP between the period 2006 and 2026 (i.e. equal to 550 dwellings per annum), whereas the Council’s reduced figure of 9,600 dwellings relates to an extended 4 year period between 2006 – 2030 which would be the equivalent of 400 dwellings per annum (i.e. a reduction of 150 dwellings per annum over the entire Plan period compared to the SEP). Thus, not only is the PSCS DPD not legally compliant in failing to be in accordance with the Development Plan (or its time period), but also it is not sound, as no satisfactory justification has been provided for the substantial reduction in the housing period and over an extended plan period. Moreover, no justification has been made as to why the council fails to take on board the evidence which clearly supports a higher housing provision than that proposed within the adopted RSS, particularly taking on board the Governments growth agenda.

Details of Changes to be Made:

We therefore suggest that the submitted Core strategy needs to be amended to take into the account the extant development plan, including the South East Plan’s housing target at the very least, but with a recognition for a higher level of growth should be planned for. At the very least therefore, there needs to be a larger degree of flexibility built into the document. Whilst the Council has within paragraphs 5.18 – 5.20, as well as policy WCS5 sought to provide a contingency within the document, this does not go far enough and needs to be far more robust to take account, as indentified above of the chronic affordable housing issues that exist within the District.
Details of Reasons for Soundess/ Legal Complaince:
As you know, the Wealden Local Strategic Partnership (LSP) sits alongside Wealden District Council (WDC) with a remit to engage in long-term strategic planning. Its members include people from WDC, East Sussex County Council and almost all the major service providers and public bodies (such as Sussex Police, East Sussex Fire & Rescue Service, the Environment Agency, the Primary Care Trust), the community and voluntary sector, and other representative groups. The LSP has been accompanying the Council on its Local Development Framework journey since the beginning of the process. It has been quite a steep learning curve for many of our partner organisations and their representatives. Together we have developed a deeper understanding of how the strategic spatial planning process is a means to delivering the overarching vision for Wealden, as expressed through the eight themes of Wealden's Sustainable Community Strategy. Since 2005, the LSP agenda has had a standing item on the Wealden LDF to ensure close and continuing engagement in the development of the emerging Core Strategy. As the background documentation details, this engagement has involved a range of workshops, activities and events, with expert input from a wide range of professionals in addition to the local authority planners. For example we held specialised events to explore housing need and housing delivery in the district, infrastructure need and provision, and awareness raising events for parish councils and businesses. We recognised the danger that very local priorities identified in community-led parish and village plans were difficult to take into account in the more formal planning process. As a result we created a bridging template based on the eight Community Strategy themes and worked with parishes to formulate up to three local priorities under each heading. LSP partners have also been participants in the LDF engagement workshops which has enabled them to not only to contribute from their own knowledge and expertise, but also to listen to and appreciate the perspectives and concerns of others. Whilst the LSP does not wish to make any representations on compliance or content of the draft Core Strategy, or comment on area-specific detail, we would like to make a formal representation to endorse the overall approach to development as set out in the proposed submission draft. We believe it takes a robust yet sensitive approach to the complex issues and constraints faced in Wealden, and represents a balanced and reasonable approach to meeting our future community needs. The predominant urban extension approach is both pragmatic and practical, but the LSP has also championed the cause of villages and rural communities. We therefore appreciate the attention paid to those settlements in rural areas which are suitable for growth, and particularly the care with which the assessment hierarchy has been created. This demonstrates a balanced commitment both to the quality of the rural environment and quality of life for those living within it.

Details of Changes to be Made:

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Details of Reasons for Soundess/ Legal Complaince:
Support for the overarching objectives that contribute to the Vision. They are laudable and, we believe, achievable in broad terms across the district.

Details of Changes to be Made:
## Representation ID 295

<table>
<thead>
<tr>
<th>Person ID</th>
<th>Ms Smith</th>
<th>Agent ID</th>
<th>Mr Gillespie</th>
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<tbody>
<tr>
<td>521490</td>
<td>WE Vine Trust</td>
<td>521485</td>
<td>Impact Planning Services Ltd</td>
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</table>

**Box 4**

- **Sound**: Yes
- **Legally Compliant**: Yes

### Details of Reasons for Soundess/ Legal Complaince:

The level of housing provision is too low. The Core Strategy should respond to the level of housing considered appropriate for the District as contained within the South East Plan. The South East Plan is the most authoritative strategic planning policy document available against which to plan for future growth. The South East Plan forms part of the development plan and the Core Strategy should be consistent with it. The annual completion rate considered appropriate for Wealden District by the South East Plan is 550 dwellings per year. The Core Strategy should plan for this level of provision. None of the constraints cited in justification for a reduction in provision to a completion rate of 400 dwellings per year are new and were made known to the Panel reporting on the Regional Strategy for the South East and were fully considered. To that extent no new material considerations have emerged which would challenge the findings of the Panel in relation to environmental constraints (including infrastructure) and accordingly the 550 dwellings per year completion rate should be restored and planned for within the Core Strategy.

### Details of Changes to be Made:

The Core Strategy Policy SPO3 should be revised to provide for at least 13,200 dwellings. The phased delivery of 550 dwellings per year should also be referred to within the policy.

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## Representation ID 332

<table>
<thead>
<tr>
<th>Person ID</th>
<th>St Richards Church</th>
<th>Agent ID</th>
<th>Mr Stewart</th>
</tr>
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<tr>
<td>521879</td>
<td></td>
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</table>

**Box 4**

- **Sound**: Yes
- **Legally Compliant**: Yes

### Details of Reasons for Soundess/ Legal Complaince:

Crowborough should be included in the text.

### Details of Changes to be Made:

The Core Strategy Policy SPO3 should be revised to provide for at least 13,200 dwellings. The phased delivery of 550 dwellings per year should also be referred to within the policy.
Details of Reasons for Soundess/ Legal Complaince:
Given the evidence presented within the Strategy and the ‘Managing the Delivery of Housing Background Paper’, South East Water is concerned that the level of housing growth proposed within the Core Strategy has not been sufficiently justified and as a result, may not be realistic. It is for this reason that the plan is not considered to be sound. South East Water has a statutory duty to develop and maintain an efficient and economical system of water supply within their area and to provide water to meet the demand of local residents and businesses. To do this, South East Water needs to understand local planning authorities' proposals for where and when new growth will take place so this can be accounted for in their forecasts. It is through accurate forecasting that South East Water can ensure that they can meet any increased need for water. Section 3.10 of the Proposed Submission Core Strategy states that trend based projections (the Office of National Statistics) show an increase in population in Wealden from 2006 to 2030 of around 19,000 persons, which equates to around 16,800 households. East Sussex County Council’s projections 2006 to 2031 show a population increase of around 20,000 persons equating to 13,500 households and 13,000 additional dwellings. The South East Plan, which has yet to be abolished, had required the provision of 11,000 homes in Wealden District between 2006 and 2026. It therefore brings into question whether the provision of 9600 homes within Wealden from 2006 and 2030 is indeed realistic. The addition of ‘at least’ within the SP03 implies that the Council consider that more housing, probably in addition to windfall sites, is likely to come forward within the plan period. The Secretary of State in December 2010, following a Public Inquiry, approved South East Water’s Water Resource Management Plan (WRMP). The job of the WRMP is to set out the company’s long term strategy (the current plan covers the period to 2035) for investment in water infrastructure and demonstrate that it can serve the level of growth proposed within its area. The Public Inquiry looked in some detail at the forecast growth. At the time the WRMP was devised, the South East Plan was in force and its growth assumptions were incorporated into the forecasting. South East Water did not however rely purely upon policy based projections but utilised a ‘most likely’ projection; this was in effect a policy-based projection for the region constrained to the national trend-based projections. The ‘most likely’ projection used by South East Water was higher than the level of growth set out within the South East Plan. Based on the evidence presented at the WRMP Inquiry, the Inspector accepted that the housing numbers within the South East Plan were not targets and that they may be exceeded. Indeed, the Inspector concluded that, “setting the rates too low could put at risk SEW’s ability to comply with its statutory duty to supply” (Paragraph 7.37, South East Water: Water Resource Management Plan – Inspector’s Report 23 September 2010). It is this risk that is of concern to South East Water. With the introduction of the Localism Bill and the abolition of Regional Spatial Strategies the process of long term forecasting is more uncertain. It is our understanding that it is the Government's intention that the Localism Bill and the abolition of Regional housing targets will stimulate growth. There are also measures such as the New Homes Bonus that are proposed to encourage housing growth that are as yet untested. South East Water appreciates that, as set out in paragraph 3.11 of the Core Strategy, environmental, economic, social, infrastructure and community considerations have tempered the amount of growth being put forward within Wealden but nevertheless a “significant housing need has been identified”. The nature of planning for water is such that new water resource infrastructure often has a long lead in time. If it materialises that housing is needed above and beyond that set out in the Core Strategy and this has not been incorporated into water forecasting then it is feasible that South East Water will have no choice but to put doubt on further growth coming forward.

Details of Changes to be Made:
South East Water is seeking assurance from Wealden District Council that the growth that is proposed within the Core Strategy can be justified, given the likely demand for housing, and is realistic. Without this justification, South East Water is concerned that the Plan is not sound.
Details of Reasons for Soundess/ Legal Complaince:
Hallam Land Management Limited (HLM) raise objection on the grounds that the Council is not planning for sufficient new dwellings having regard to the adopted South East Plan and the Council’s own estimates of housing demand based on population and household projections, and this is explored in more detail in the submission made on behalf of HLM by Turley Associates. Furthermore HLM object to the distribution of new homes, which proposes a reduction by 20% of the total number of new homes proposed being allocated within the Sussex Coast Sub region, as defined in the South East Plan. This in the opinion of HLM will seriously prejudice the regeneration of this area.

Details of Changes to be Made:
The Proposed Submission Core Strategy should provide for at least 11,000 (and arguably up to around 16,000) dwellings over the period 2006-2030, to comply with the requirements of the SEP and the available evidence on household and dwelling formation with some 64% of the total provision being directed to that part of the District which falls within the Sussex Coast Sub Region.
7.1.1 In this section of the report we present our representations in regard to landscape matters in and informing the Core Strategy. Our representation is made in regard to paragraphs 3.30 – 3.33 of the submission Core Strategy, Policies WC4 and WC13 and supporting background papers. 7.1.2 For the purposes of this representation we have reviewed the ‘Landscape Character Assessment and Development Option Evaluation Study’ undertaken for the district (referred hereinafter as the ‘Landscape Study’), which is included as a background paper to the Core Strategy on the Council’s website. However, it is not clear how the Landscape Study has been used to inform the spatial strategy as it is not specifically referred to in the text of Core Strategy nor is the Landscape Study listed as a background paper at paragraph 1.7 of the Core Strategy (although it is included as a background paper on the Council’s website). 7.1.3 We have reviewed the methodology set out in the document and we have also reviewed whether the methodology has been consistently applied resulting in a final report that is robust, thorough and transparent and one that would form a credible evidence base suitable to inform the spatial strategy contained in the Core Strategy. 7.1.4 We contend that the Landscape Study is flawed and therefore the assessment of housing sites in the district, the spatial strategy and the Council’s Sustainability Appraisal, and thus the Core Strategy, is unsound. 7.1.5 Our representation is summarised below: Section of Core Strategy: Spatial Planning Objectives 1, 3 and 11, Paras 3.30 - 3.33, Policy WCS4 Strategic Development Areas, Figure 6 Uckfield Area Strategy, Paras 6.9 and 6.11, Policy WSC13 Green Infrastructure, Paras 7.23 - 7.28Legally Compliant: -Sound: No -Justified: Yes -Effective: No -Consistent with national policy: No Proposed Submission Core Strategy Paragraphs 3.30 – 3.33 7.1.6 Paragraph 3.30 of the Proposed Submission Core Strategy refers to Wealden’s environmental attributes and that they have an important part to play in the development of the spatial strategy and ‘had a significant impact upon the assessment of the suitability of housing land in relation to the SHLAA’. 7.1.7 Paragraph 3.30 goes on to state that: “…and sites have been carefully scrutinised with regards to landscape impact.” 7.1.8 Paragraph 3.33 refers to Government guidance and the level of protection this provides for the environment, particularly nationally and internationally designated sites, which are not duplicated in the Core Strategy. The paragraph goes on to state: “However, our strategy has been guided by high levels of protection on local and national levels, and more detailed policies are contained within the Core Strategy and further ones in subsequent DPDs.” 7.1.9 Paragraph 1.7 in the Introduction to the Core Strategy refers to a number of specialist studies that have been produced to provide a robust evidence base to inform the Local Development Framework. The Landscape Study is not listed as a background paper at paragraph 1.7 of the Core Strategy (although it is included as a background paper on the Council’s website). Policy WCS4 Strategic Development Areas and Paragraphs 6.9 and 6.11 7.1.10 The Core Strategy proposes that the land to the west of Uckfield be identified as a ‘strategic development area’ suitable for accommodating 1,000 homes and some 12,650 sq metres net of employment floor space and education provision as an extension to the urban area to the west of New Town. Paragraph 6.9 refers to the SHLAA and assessment of the potential sites at the fringes of the urban area. 7.1.11 In the light of the comments that follow in this section of our representations on the Landscape Study, it considered that this proposal be reassessed and, taking into account other representations made on other parts and policies contained in the Core Strategy, greater emphasis should be given to the suitability of land at Maresfield to accommodate increased housing numbers and a larger proportion of the housing requirements for the district. Policy WSC13 Green Infrastructure, Paragraphs 7.23 - 7.28 and Background Paper BP6 7.1.12 Policy WSC13 and paragraph 7.23 to 7.28 relating to Green Infrastructure is supported although it is considered that the anomalies and errors in the Landscape Study be addressed before this document is used to inform and guide the implementation of Green Infrastructure Strategy and also formulation of the specific measures for the protection and enhancement of the landscape which are to set out in the Delivery and Site Allocations DPD referred to at paragraph 7.28 of the Core Strategy. 7.1.13 It is not clear from reading the Core Strategy, how the Landscape Study has been used to inform the above policies. 7.2 Consideration of the Methodology employed in the Landscape Study 7.2.1 Wealden Council commissioned the Landscape Study from the Landscape Group at East Sussex County Council, in September 2007. It was published in February 2009. The purpose of the Study is to: 1. Inform the preparation of WDC Local Development Framework Core Strategy and; 2. Inform the development policies on landscape management and protection. 7.2.2 The Landscape Study states that it will: 1. Assess the existing landscape character of key search areas 2. Assess the quality and value of the existing landscape in these key search areas 3. Assess the sensitivity if the existing landscape and its capacity to accept change or having regard to the scope for mitigation 4. Make recommendations on preferred locations from a landscape perspective. 7.2.3 The Landscape Study purports to use a number of methodologies for the assessment and
identifies these as being: 1. For Landscape Character/ Quality and Value - Design Manual for Roads and Bridges Vol 11, section 3, Part 5 (DT) which has been further refined by the Landscape Character Assessment Guidance for England and Scotland (CA/SNH 2002) and; 2. For landscape sensitivity – Landscape Character Assessment Guidance for England and Scotland, Topic Paper No.6: Techniques and criteria for Judging Capacity and Sensitivity (CA 2002). 7.2.4 The Landscape Study sets out, in section 2.0, the methodology and criteria used for each aspect of the landscape being assessed, including the following: 1. Landscape Quality (this should be ‘condition’ if following latest LCA guidance as the term quality is now a discredited approach to assessing landscapes) 2. Landscape Value 3. Landscape Sensitivity 4. Visual Sensitivity 5. Landscape Capacity 7.2.5 In relation to the assessment of landscape capacity, capacity is defined in Topic Paper No.6: ‘Techniques and Criteria for Judging Capacity and Sensitivity’ as: ‘The degree to which a particular landscape type or area is able to accommodate change without significant effect on its character, or overall change of landscape character type. Capacity is likely to vary according to the type and nature of change being proposed’. 7.2.6 We have reviewed the Landscape Study, in particular, the methodology set out in the document and whether this has been consistently applied to form a credible evidence base suitable to inform the spatial strategy contained in the Core Strategy. 7.2.7 The review of the Core Strategy background paper indicates that the Landscape Study has not followed the guidance in Topic Paper No.6. Topic Paper No.6 suggests that there are two approaches to assessing landscape sensitivity. These are: 1. Judging Overall Landscape Sensitivity and; 2. Judging Landscape Sensitivity to a specific type of change. 7.2.8 However, in order to assess landscape capacity, the assessment of the sensitivity of different types or areas of landscape to the type of change in question must be combined with an assessment of the more subjective or perceptual aspects of the landscape and of the value attached to the landscape. 7.2.9 The stages for assessing landscape capacity of a landscape are set out in Section 3.0 of Topic Paper No.6 and reproduced in Figure 7.1 below. Figure 7.1: Stages for assessing landscape capacity Source: Landscape Character Assessment Guidance for England and Scotland, Topic Paper No.6: Techniques and criteria for Judging Capacity and Sensitivity (CA 2002) 7.2.10 Sections 5.0 and 6.0 of Topic Paper No.6 provide the more detailed considerations that need to be taken into account. 7.2.11 The boxed text, at paragraph 2.11.2 of the Landscape Study, follows the same assessment stages used to assess the landscape capacity to accommodate a specific type of change and given the local scale of the assessment work it is considered that this is the appropriate method to use. 7.2.12 However, Topic Paper No.6, at paragraph 6.5, also goes on to state that: ‘Capacity is all a question of the interaction between the sensitivity of the landscape, the type and amount of change and the way that the landscape is valued’. 7.2.13 Sections 2.11 and 2.12 of the Landscape Study set out the approach used by East Sussex County Council landscape group in undertaking the landscape study. However, the assessment does not define the quantum of housing development used to assess the capacity of each character area, nor is the LDF Core Issues and Options Consultation Paper July 2007 referred to as a guide to the quantum of housing development used to assess each of the different character areas. The Landscape Study does however state at paragraph 2.12.3 that: ‘an overall assessment can be made for each character area on the capacity to accept the type of change being considered. This judgement is made according to the combination of characteristics that contribute to a particular area of landscape. The capacity of an area to accept change is related to the potential of the area to accommodate development in a particular location without detracting from the overall character of that landscape. The capacity evaluation of each character area does not assume that this is the capacity across the entire character area’ 7.2.14 There are a number interrelated issues raised in the above paragraph which we now turn to. 7.2.15 In relation to the type of change, the Landscape Study defines, at paragraph 2.12.6, the assumptions used for the assessment business uses, i.e. the assessment of sensitivity / capacity is based on light industrial type uses which would be consistent with a residential environment and these would be single storey units. However the Landscape Study does not define the full details of the housing use, such as type (housing - single storey / two storey / three storey etc) or amount (large / medium / small scale development) and we contend that the details of the change being considered is not transparent from the Landscape Study, as although the type of change (i.e. housing) is known, the form and amount of housing is unknown. These are important factors when considering the landscape capacity of an area to accommodate development, especially if using the stages set in the Landscape Study. 7.2.16 A similar assumption to the business use (or range of assumptions) could have been used for assessing the impact on landscape sensitivity / capacity of each character area. For example two to three storey houses at the following ranges: 1. small scale housing between five to 50 dwellings 2. medium scale housing development between 50 to 200 dwellings, and 3. large scale housing development between 200 to 500 dwellings. 7.2.17 In relation to the combination of the characteristics that contribute to a particular area, comments on these are made in later sections (See paragraphs 7.4.1 to 7.4.14 below). 7.2.18 The Landscape Study also refers to mitigation and management of the landscape (Section 2.13) and, in paragraph 2.13.1, it highlights that mitigation has been used to determine the visual and character sensitivity of the landscape. This approach does not accord with Topic Paper No.6 as mitigation should only be used to inform the visual sensitivity of the area assessed, (See Figure 7.1 above), and not directly the character sensitivity of an area (although visual aspects are one of the aspects that inform the character of an area). Mitigation in itself can have a significant effect on character and the landscapes capacity to accommodate development. In some cases mitigation would make an area less suitable to accommodate development not more suitable. Again this, we would contend, is a flaw in the assessment. The existing management of the landscape is relevant to determining the condition (or quality) of an area of landscape but the identification of management opportunities is not relevant to determining the capacity of the landscape to
accommodate development. Management of the land could in itself bring about a change to the landscape which is discordant with its character, for instance managing the land to encourage woodland growth or planting extensive woodlands in a very open exposed landscape would lead to a significant change. 7.2.19 The methodology section of the Landscape Study also includes a part dealing with the Areas of Outstanding Natural Beauty (AONB) within the district. Section 2.14 refers to ‘AONBs and AONB Buffer Zones’ as a way of identifying higher value landscapes within Wealden. At paragraph 2.14.2 the Landscape Study states: ‘There is, in some areas adjacent to the AONB boundary a buffer zone to the AONB landscape. This is usually an area of similar character but not of the same quality as the AONB landscape and not covered by the same planning policy. Where relevant these areas are indicated in the figures’. 7.2.20 Paragraph 2.14.4, the Landscape Study goes on the state the following: ‘These buffer zones have been identified through the character area analysis. The relative sensitivity of these areas has been considered according to the landscape character to achieve a balanced comparison with AONB and AONB landscapes’. 7.2.21 The Landscape Study considers that there is support for this ‘buffer zone’ approach due to Policy EN2 (f) of the East Sussex and Brighton and Hove Structure Plan. We contend that this approach is flawed and unsound. Firstly, the Structure Plan has been superseded by the South East Plan and at the time of preparing the Landscape Study during the period August 2007 to February 2009, both East Sussex County Council and Wealden District Council would have been aware of the emerging South East Plan policies through the draft regional plan. Secondly, Policy EN2 (f) does not prohibit development but seeks to protect the Sussex Downs and High Weald AONBs and minimise the impact of development within them by requiring measures to integrate the development in to the landscape. Thirdly, there is no Government policy support for the concept of ‘AONB buffers’ in Planning Policy Statement No.7. Like Policy EN2 of the Structure Plan, PPS 7 does not prohibit development within the boundaries or adjoining an AONB but merely seeks to ensure that the landscapes within AONBs are considered carefully and appropriate measures taken to mitigate the harm that potential development may cause. 7.2.22 The fourth point is that, whilst the Council would seek support from Policy EN2 (f) as a way of ‘balancing the comparison between AONB and non AONB areas’ especially the areas of landscape close to the AONB boundary, the East Sussex and Brighton and Hove Structure Plan does not define the extent of the buffer zone on the Key Diagram nor is the extent of the buffer area set out in its explanatory text. We contend that the justification for this approach must be given very little weight. 7.2.23 Lastly, it is acknowledged that some areas of landscape within an AONB may be of poorer condition (quality) score and / or lower visual and character sensitivity than areas outside of the AONB but the adjustment in the landscape sensitivity / capacity scoring by introducing what appears to be an arbitrary AONB buffer zone seems to undermine the purposes and status of the AONB designation,(and its planning policy protection), by attaching increased value to a character area that adjoins the AONB which although it may be of a similar character, does not meet the quality criteria for inclusion within the AONB. In addition, it is noted that the Landscape Study has not been subject to peer review and there is no evidence that it has had stakeholder input / consultation with statutory consultees, such Natural England / High Weald AONB Joint Advisory Committee and other interested bodies to agree this approach to the AONBs. 7.2.24 The Study goes on to set out the method used to undertake a comparative evaluation of a potential development area within a character area which has capacity to accommodate development. This gives an early indication of sites which would be worthy of further consideration for development in landscape terms. We contend that the comparative assessment of character areas within the District is flawed as the starting point for the assessment the landscape sensitivity / capacity analysis is unsound for the reason given above. 7.2.25 Notwithstanding the above point, Section 2.15.4 of the Landscape Study states that: ‘Prior to coming to a firm view on the full potential and scope in these areas further investigation would be required’. 7.2.26 However, the Study does not present evidence of this further investigation or how preferred development areas have been chosen; for example there is no detailed assessment of the west of Uckfield area although this has been identified as a major urban extension area under Policy WCS4 - SD1. 7.3 Critical Review of the findings of the Landscape Study 7.3.1 The Landscape Study methodology sets out how each landscape character is to be assessed and the information recorded using landscape character assessment sheets (section 2.5) whilst section 2.17 of the Landscape Study refers to mapping which is split into two stages. Stage 1 relates to recording baseline information on each character area such as planning designation, Public Right of Way and key viewpoint, focal point, landscape features and detractors (which should be read with the assessment record sheets). Stage 2 relates to the identification of potential development areas with indicative boundaries and also identifies key woods, shaws, hedges, tree belts etc and also the potential for mitigation planting. 7.3.2 In order to assess the robustness of the landscape capacity study for the purpose of this representation, the area around Uckfield, Maresfield and Five Ash Down were visited and the baseline information recorded on the landscape assessment sheets checked and the judgements reached reviewed. This check revealed that that were a number of elements / features not recorded or identified for some areas and therefore these factors were not able to inform the judgement reached. 7.3.3 For example, ‘Maresfield Area A’, is described as: ‘An open, undulating landscape used for pasture to the west and pleasure to the east. It is ungrazed showing some scrub. Wide long views to the south. Surrounded on other sides by mature trees and exotic Eucalyptus and Cedars from nearby Park. Fine houses on outskirts and within site. Fine clumps of Pines. Some road noise adjoins picturesque recreation ground’. 7.3.4 The assessment sheet omits a number of important features such as areas of woodlands and plantations, (some of which are ancient woodlands and provide screening, containment and form visual barriers). Hedges, fences, footpaths and reference to the bypass were not recorded. The assessment sheet also refers to parkland and that the majority of the land is amenity land lacking management. A wide long view(s) out to
the south is highlighted as a key feature which is correct when looking south from a small part of the area but elsewhere views are contained and obscured by landform and vegetation. The record sheet includes a photograph of the view south but this is not taken from the recreation ground as recorded on the map Figure 52. The photograph was taken from private land on the footpath. 7.3.5 In the visual appraisal section of the assessment sheet it records the local receptors as amenity land and houses, types of view as long views from top of ridge to the south and visual barriers as landform / trees and hedges. It concludes that the sensitivity is high (see table 7.1 below). It is acknowledged that there are views within the area but these tend to be short partial or glimpsed views with long views out towards the south from high ground in the north eastern parts of character area. Views into the area are very limited and development within the area would have a minimal impact on views. However, in views from the ridge to the south the recreation occupying the north eastern parts of the character area is seen whilst the remaining areas are hidden from view and therefore the visual sensitivity of the majority of the area is low. 7.3.6 The resultant evaluation of this area was considered as follows: Table 7.1: Landscape Study Assessment, Maresfield Area A Character Area Maresfield A Quality Good Value Medium Sensitivity to Change Moderate Visual Sensitivity High Management Opportunities Mange hedges and grazing. Mange recreational spaces and access to countryside. Need to retain gap between Maresfield and Uckfield. Potential for Mitigation Low Planted would change open character and obscure long views out from recreation ground Capacity to Accept Change: Housing Low Close to village edge only Capacity to Accept Change: Business Low 7.3.7 We contend that the record sheets are incorrect and the judgement on quality / condition is erroneous and should be ‘ordinary’ as most of the land is unmanaged comprising rank grassland of little intrinsic landscape value and the visual sensitivity of the area is ‘moderate or low’ due to the strong enclosure afforded to the area. It is interesting to note that one of the management opportunities is to retain a gap between Maresfield and Uckfield although there is no planning policy support for the retention of gaps in the Core Strategy or previous Non Statutory Wealden Local Plan. 7.3.8 By comparison, another example is Character Area L – land to the west of Uckfield, which is described as: ‘Land sloping away from urban edge to Uck valley and A26 Uckfield by pass. Strong field structure with arable and pasture. Some large fields. Sewage works detractors. Few focuses of character. Development would need a well defined edge to prevent creep’. 7.3.9 The assessment sheet for this character area has recorded the land cover and landscape elements correctly but has not recorded any landform features and relatively few aesthetic factors, although it describes the land as sloping away from the urban edge with a strong field structure with arable and pasture. The landscape condition is considered to be fair which is not defined in the methodology although this changes to ordinary in the comparison table. 7.3.10 In the visual appraisal section of the assessment sheet it records the local receptors as countryside on the other side of Uck Valley, isolated properties, footpaths and A26 and houses on the urban edge, types of view as views across to woods at West Park / Butchers Wood, wooded ridge of Shortbridge across Uckfield Valley and visual barriers as few. It concludes that the sensitivity is ‘moderate’ (see table 7.2). Table 7.2: Landscape Study Assessment, Uckfield Area L Character Area Uckfield L Quality Ordinary Value Medium Snaw Accessible for recreation Sensitivity to Change Moderate Visual Sensitivity Moderate High on ridge Management Opportunities Mange recreational spaces and access to countryside. Create green network. Relocate recreation ground Capacity to Accept Change: Housing Moderate Need well defined boundaries close to urban edge avoid high ground Capacity to Accept Change: Business No capacity 7.3.11 We contend that the record sheets are incorrect and the judgement on quality / condition is under estimated and should be ‘good’ as most of the land is attractive farmed landscape with some distinctiveness features with a recognisable landscape structure. The assessment sheet ignores the open exposed nature of this character area, with long views south and west and numerous views in to the area from the surrounding countryside (roads and footpaths), and therefore the visual sensitivity of the area should be ‘high’ due the number of viewpoints where views can be obtained. This can be compared to the Maresfield A area which is considered to have ‘high’ sensitivity rating but with a few vantage points available where development impacts will be perceived. 7.3.12 We also note that under management opportunities it is considered that the area could contribute to managing the urban fringe, which could equally apply to the land at Maresfield, and that under the potential for mitigation heading is considered that the area has a ‘moderate’ ability, although the introduction of mitigate planting as shown Figure 11 of the landscape Study would dramatically and significantly change the landscape character of the area. 7.3.13 These examples illustrate the inconsistency of the landscape assessment record sheet and the arbitrary nature of the judgements made. It does not give any confidence to the manner in which the Landscape Study has been undertaken or to the transparent way that the judgements have been reached. 7.4 Implications for the soundness of the Core Strategy 7.4.1 We have reviewed the ‘Landscape Character Assessment and Development Option Evaluation Study’ of the district. It is not clear how this Landscape Study has been used to inform the spatial strategy as it is not specifically referred to in the Core Strategy, nor is the Landscape Study listed as a background paper at paragraph 1.7 of the Core Strategy (although it is included as a background paper on the Councils website). 7.4.2 We have reviewed the methodology set out in the document and we have also reviewed whether the methodology has been consistently applied resulting in a final report that is robust, thorough, and transparent and that it would form a credible evidence base suitable to inform the spatial strategy contained in the Core Strategy. The Study also includes a methodology employed to undertake a comparative evaluation of a potential development area within a character area which has capacity to accommodate development. 7.4.3 The examples referred to in our analysis above illustrate the inconsistency of the landscape assessment record sheets and arbitrary nature of the judgements made and it does not give any confidence to the manner in which the
Landscape Study has been undertaken or to the transparent way that the judgements have been reached. 7.4.4 We contend that the Landscape Study is flawed and therefore the assessment of housing sites in the district, the spatial strategy and the Councils Sustainability Appraisal is unsound. In addition, in relation to the comparison assessment of sites within the district surrounding the towns and villages; we contend that this comparative assessment of character areas is flawed as the starting point for the assessment the landscape sensitivity/capacity analysis is unsound for the reason given above. 7.4.5 The Core Strategy proposes that the land to the west of Uckfield be identified as a ‘strategic development area’ suitable for accommodating 1,000 homes and some 12,650 sq metres net of employment floor space and education provision as an extension to the urban area to the west of New Town. In the light of the comments made on the Landscape Study, it is considered that this proposal be reassessed and, (taking into account the other representations made on other parts and policies contained in the Core Strategy), greater emphasis be given to the suitability of land at Maresfield to accommodate increased housing numbers and a larger proportion of the housing requirements for the district. 7.4.6 Policy WSC13 relating to Green Infrastructure is supported although it is considered that the anomalies and errors in the Landscape Study be addressed before this document is used to inform and guide the implementation of Green Infrastructure Strategy and also formulation of the specific measures for the protection and enhancement of the landscape which are to set out in the Delivery and Site Allocations DPD referred to at paragraph 7.28 of the Core Strategy.

Details of Changes to be Made:
SUMMARY 7.4.7 In conclusion, we contend that the Core Strategy is unsound because: 1. It is not justified as it is not based on a sound evidence base as the Landscape Study (Landscape Character Assessment and Development Options Evaluation Study of the District) is flawed and therefore the assessment of housing sites in the district, the spatial strategy and the Councils Sustainability Appraisal is unsound. It is not clear how the Landscape Study has been used to inform the spatial strategy as it is not specifically referred to in the Core Strategy nor is the Landscape Study listed as a background paper at paragraph 1.7 of the Core Strategy; 2. It is not justified because the Landscape Study as it is not robust, thorough, and transparent and that it does not form a credible evidence base suitable to inform the spatial strategy contained in the Core Strategy. The Landscape Study contains a number inconsistencies set out in the landscape assessment record sheets and contains a number of arbitrary judgements and so it does not give any confidence to the manner in which the Landscape Study has been undertaken or to the transparent way that the judgements have been reached. 3. It is not consistent with national policy as the methodology for undertaking the Landscape Study (which has been used to inform the spatial strategy) refers to ‘AONB and AONB Buffer Zones’ as a way of identifying higher value landscapes. There are a number of reasons why this approach is unsound but there is no Government policy support for the concept of ‘AONB buffers’ in Planning Policy Statement No.7 or any other policy guidance.
In this section of the report we present our representations in regard to landscape matters in and informing the Core Strategy. Our representation is made in regard to paragraphs 3.30 – 3.33 of the submission Core Strategy, Policies WC4 and WC13 and supporting background papers. For the purposes of this representation we have reviewed the ‘Landscape Character Assessment and Development Option Evaluation Study’ undertaken for the district (referred hereinafter as the ‘Landscape Study’), which is included as a background paper to the Core Strategy on the Councils website. However, it is not clear how the Landscape Study has been used to inform the spatial strategy as it is not specifically referred to in the text of Core Strategy nor is the Landscape Study Listed as a background paper at paragraph 1.7 of the Core Strategy (although it is included as a background paper on the Councils website). We have reviewed the methodology set out in the document and we have also reviewed whether the methodology has been consistently applied resulting in a final report that is robust, thorough and transparent. It is not clear how the assessment of housing sites in the district, the spatial strategy and the Council’s Sustainability Appraisal, and thus the Core Strategy, is unsound. Our representation is summarised below: Section of Core Strategy: Spatial Planning Objectives 1, 3 and 11, Paras 3.30 - 3.33, Policy WCS4 Strategic Development Areas, Framework. The Landscape Study is not listed as a background paper at paragraph 1.7 of the Core Strategy (although it is included as a background paper on the Councils website). We contend that the Landscape Study is flawed and therefore the assessment of housing sites in the district, the spatial strategy and the Councils Sustainability Appraisal, and the Core Strategy, is unsound.

Details of Reasons for Soundness/ Legal Complaince:

7 Landscape 7.1 Introduction 7.1.1 In this section of the report we present our representations in regard to landscape matters in and informing the Core Strategy. Our representation is made in regard to paragraphs 3.30 – 3.33 of the submission Core Strategy, Policies WC4 and WC13 and supporting background papers. For the purposes of this representation we have reviewed the ‘Landscape Character Assessment and Development Option Evaluation Study’ undertaken for the district (referred hereinafter as the ‘Landscape Study’), which is included as a background paper to the Core Strategy on the Councils website. However, it is not clear how the Landscape Study has been used to inform the spatial strategy as it is not specifically referred to in the text of Core Strategy nor is the Landscape Study Listed as a background paper at paragraph 1.7 of the Core Strategy (although it is included as a background paper on the Councils website). 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We contend that the Landscape Study is flawed and therefore the assessment of housing sites in the district, the spatial strategy and the Councils Sustainability Appraisal, and thus the Core Strategy, is unsound. 7.1.5 Our representation is summarised below: Section of Core Strategy: Spatial Planning Objectives 1, 3 and 11, para 3.30 of the Proposed Submission Core Strategy refers to Wealden’s environmental attributes and that they have an important part to play in the development of the spatial strategy and ‘had a significant impact upon the assessment of the suitability of housing land in relation to the SHLAA’. 7.1.7 Paragraph 3.30 goes on to state that: “...and sites have been carefully scrutinised with regards to landscape impact.” 7.1.8 Paragraph 3.33 refers to Government guidance and the level of protection this provides for the environment, particularly nationally and internationally designated sites, which are not duplicated in the Core Strategy. The paragraph goes on to state: “However, our strategy has been guided by high levels of protection on local and national levels, and more detailed policies are contained within the Core Strategy and further ones in subsequent DPDs.” 7.1.9 Paragraph 1.7 in the Introduction to the Core Strategy refers to a number of specialist studies that have been produced to provide a robust evidence base to inform the Local Development Framework. The Landscape Study is not listed as a background paper at paragraph 1.7 of the Core Strategy (although it is included as a background paper on the Councils website). Policy WCS4 Strategic Development Areas and Paragraphs 6.9 and 6.11 The Core Strategy proposes that the land to the west of Uckfield be identified as a ‘strategic development area’ suitable for accommodating 1,000 homes and some 12,650 sq metres net of employment floor space and education provision as an extension to the urban area to the west of New Town. Paragraph 6.9 refers to the SHLAA and assessment of the potential sites at the fringes of the urban area. 7.1.11 In the light of the comments that follow in this section of our representations on the Landscape Study, it considered that this proposal be reassessed and, taking into account other representations made on other parts and policies contained in the Core Strategy, greater emphasis should be given to the suitability of land at Maresfield to accommodate increased housing numbers and a larger proportion of the housing requirements for the district. Policy WSC13 Green Infrastructure, Paragraphs 7.23 - 7.28 and Background Paper BP6 7.1.12 Policy WSC13 and paragraph 7.23 to 7.28 relating to Green Infrastructure is supported although it is considered that the anomalies and errors in the Landscape Study be addressed before this document is used to inform and guide the implementation of Green Infrastructure Strategy and also formulation of the specific measures for the protection and enhancement of the landscape which are to be set out in the Delivery and Site Allocations DPD referred to at paragraph 7.28 of the Core Strategy. 7.1.13 It is not clear from reading the Core Strategy, how the Landscape Study has been used to inform the above policies. 7.2 Consideration of the Methodology employed in the Landscape Study 7.2.1 Wealden Council commissioned the Landscape Study from the Landscape Group at East Sussex County Council, in September 2007. It was published in February 2009. The purpose of the Study is to: 1. Inform the preparation of WDC Local Development Framework Core Strategy and; 2. Inform the development policies on landscape management and protection. 7.2.2 The Landscape Study states that it will: 1. Assess the existing landscape character of key search areas 2. Assess the quality and value of the existing landscape in these key search areas 3. Assess the sensitivity if the existing landscape and its capacity to accept change or having regard to the scope for mitigation 4. Make recommendations on preferred locations from a landscape perspective. 7.2.3 The Landscape Study purports to use a number of methodologies for the assessment and
identifies these as being: 1. For Landscape Character/ Quality and Value - Design Manual for Roads and Bridges Vol 11, section 3, Part 5 (DT) which has been further refined by the Landscape Character Assessment Guidance for England and Scotland (CA/SNH 2002) and; 2. For landscape sensitivity – Landscape Character Assessment Guidance for England and Scotland, Topic Paper No.6: Techniques and criteria for Judging Capacity and Sensitivity (CA 2002). 7.2.4 The Landscape Study sets out, in section 2.0, the methodology and criteria used for each aspect of the landscape being assessed, including the following: 1. Landscape Quality (this should be ‘condition’ if following latest LCA guidance as the term quality is now a discredited approach to assessing landscapes) 2. Landscape Value 3. Landscape Sensitivity 4. Visual Sensitivity 5. Landscape Capacity 7.2.5 In relation to the assessment of landscape capacity, capacity is defined in Topic Paper No.6: ‘Techniques and Criteria for Judging Capacity and Sensitivity’ as: ‘The degree to which a particular landscape type or area is able to accommodate change without significant effect on its character, or overall change of landscape character type. Capacity is likely to vary according to the type and nature of change being proposed’. 7.2.6 We have reviewed the Landscape Study, in particular, the methodology set out in the document and whether this has been consistently applied to form a credible evidence base suitable to inform the spatial strategy contained in the Core Strategy. 7.2.7 The review of the Core Strategy background paper indicates that the Landscape Study has not followed the guidance in Topic Paper No.6. Topic Paper No.6 suggests that there are two approaches to assessing landscape sensitivity. These are: 1. Judging Overall Landscape Sensitivity and; 2. Judging Landscape Sensitivity to a specific type of change. 7.2.8 However, in order to assess landscape capacity, the assessment of the sensitivity of different types or areas of landscape to the type of change in question must be combined with an assessment of the more subjective or perceptual aspects of the landscape and of the value attached to the landscape. 7.2.9 The stages for assessing landscape capacity of a landscape are set out in Section 3.0 of Topic Paper No.6 and reproduced in Figure 7.1 below. Figure 7.1: Stages for assessing landscape capacity Source: Landscape Character Assessment Guidance for England and Scotland, Topic Paper No.6: Techniques and criteria for Judging Capacity and Sensitivity (CA 2002) 7.2.10 Sections 5.0 and 6.0 of Topic Paper No.6 provide the more detailed considerations that need to be taken into account. 7.2.11 The boxed text, at paragraph 2.11.2 of the Landscape Study, follows the same assessment stages used to assess the landscape capacity to accommodate a specific type of change and given the local scale of the assessment work it is considered that this is the appropriate method to use. 7.2.12 However, Topic Paper No.6, at paragraph 6.5, also goes on to state that: ‘Capacity is all a question of the interaction between the sensitivity of the landscape, the type and amount of change and the way that the landscape is valued’. 7.2.13 Sections 2.11 and 2.12 of the Landscape Study set out the approach used by East Sussex County Council landscape group in undertaking the landscape study. However, the assessment does not define the quantum of housing development used to assess the capacity of each character area, nor is the LDF Core Issues and Options Consultation Paper July 2007 referred to as a guide to the quantum of housing development used to assess each of the different character areas. The Landscape Study does however state at paragraph 2.12.3 that: ‘an overall assessment can be made for each character area on the capacity to accept the type of change being considered. This judgement is made according to the combination of characteristics that contribute to a particular area of landscape. The capacity of an area to accept change is related to the potential of the area to accommodate development in a particular location without detracting from the overall character of that landscape. The capacity evaluation of each character area does not assume that this is the capacity across the entire character area’ 7.2.14 There are a number interrelated issues raised in the above paragraph which we now turn to. 7.2.15 In relation to the type of change, the Landscape Study defines, at paragraph 2.12.6, the assumptions used for the assessment business uses, i.e. the assessment of sensitivity / capacity is based on light industrial type uses which would be consistent with a residential environment and these would be single storey units. However the Landscape Study does not define the full details of the housing use, such as type (housing - single storey / two storey / three storey etc) or amount (large / medium / small scale development) and we contend that the details of the change being considered is not transparent from the Landscape Study, as although the type of change (i.e. housing) is known, the form and amount of housing is unknown. 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For example two to three storey houses at the following ranges: 1. small scale housing between five to 50 dwellings 2. medium scale housing development between 50 to 200 dwellings, and 3. large scale housing development between 200 to 500 dwellings. 7.2.17 In relation to the combination of the characteristics that contribute to a particular area, comments on these are made in later sections (See paragraphs 7.4.1 to 7.4.14 below). 7.2.18 The Landscape Study also refers to mitigation and management of the landscape (Section 2.13) and, in paragraph 2.13.1, it highlights that mitigation has been used to determine the visual and character sensitivity of the landscape. This approach does not accord with Topic Paper No.6 as mitigation should only be used to inform the visual sensitivity of the area assessed, (See Figure 7.1 above), and not directly the character sensitivity of an area (although visual aspects are one of the aspects that inform the character of an area). Mitigation in itself can have a significant effect on character and the landscapes capacity to accommodate development. In some cases mitigation would make an area less suitable to accommodate development not more suitable. Again this, we would contend, is a flaw in the assessment. The existing management of the landscape is relevant to determining the condition (or quality) of an area of landscape but the identification of management opportunities is not relevant to determining the capacity of the landscape to
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approach due to Policy EN2 (f) of the East Sussex and Brighton and Hove Structure Plan. We contend that this
approach is flawed and unsound. Firstly, the Study has not been superseded by the emerging South East Plan and at
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County Council and Wealden District Council would have been aware of the emerging South East Plan policies
through the draft regional plan. Secondly, Policy EN2 (f) does not prohibit development but seeks to protect the
Sussex Downs and High Weald AONBs and minimise the impact of development within them by requiring
measures to integrate the development into the landscape. Thirdly, there is no Government policy support for the
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landscapes within AONBs are considered carefully and appropriate measures taken to mitigate the harm that
potential development may cause. 7.2.22 The fourth point is that, whilst the Council would seek support from
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the extent of the buffer zone on the Key Diagram nor is the extent of the buffer area set out in its explanatory text.
We contend that the justification for this approach must be given very little weight. 7.2.23 Lastly, it is
acknowledged that some areas of landscape within an AONB may be of poorer condition (quality) score and / or
lower visual and character sensitivity than areas outside of the AONB but the adjustment in the landscape
sensitivity / capacity scoring by introducing what appears to be an arbitrary AONB buffer zone seems to undermine
the purposes and status of the AONB designation, (and its planning policy protection), by attaching increased value
to a character area that adjoins the AONB which although it may be of a similar character, does not meet the
quality criteria for inclusion within the AONB. In addition, it is noted that the Landscape Study has not been subject
to peer review and there is no evidence that it has had stakeholder input / consultation with statutory consultees,
such Natural England / High Weald AONB Joint Advisory Committee and other interested bodies to agree this
approach to the AONBs. 7.2.24 The Study goes on to set out the method used to undertake a comparative
evaluation of a potential development area within a character area which has capacity to accommodate
development. This gives an early indication of sites which would be worthy of further consideration for
development in landscape terms. We contend that the comparative assessment of character areas within the
District is flawed as the starting point for the assessment the landscape sensitivity / capacity analysis is unsound
for the reason given above. 7.2.25 However, the Study does not present evidence of this further investigation or how preferred
development areas have been chosen; for example there is no detailed assessment of the west of Uckfield area
although this has been identified as a major urban extension area under Policy WCS4 - SD1. 7.3 Critical Review of
the findings of the Landscape Study 7.3.1 The Landscape Study methodology sets out how each landscape
classification is to be assessed and the information recorded using landscape character assessment sheets (section
2.5) whilst section 2.17 of the Landscape Study refers to mapping which is split into two stages. Stage 1 relates to
recording baseline information on each character area such as planning designation, Public Right of Way and key
viewpoint, focal point, landscape features and detractors (which should be read with the assessment record
sheets). Stage 2 relates to the identification of potential development areas with indicative boundaries and also
identifies key woods, shaws, hedges, tree belts etc and also the potential for mitigation planting. 7.3.2 In order to
assess the robustness of the landscape capacity study for the purpose of this representation, the area around
Uckfield, Maresfield and Five Ash Down were visited and the baseline information recorded on the landscape
assessment sheets checked and the judgements reached reviewed. This check revealed that that were a number of
elements / features not recorded or identified for some areas and therefore these factors were not able to
inform the judgement reached. 7.3.3 For example, ‘Maresfield Area A’, is described as: ‘An open, undulating
landscape used for pasture to the west and pleasure to the east. It is ungrazed showing some scrub. Wide long
views to the south. Surrounded on other sides by mature trees and exotic Eucalyptus and Cedars from nearby
Park. Fine houses on outskirts and within site. Fine clumps of Pines. Some road noise adjoins picturesque
recreation ground’. 7.3.4 The assessment sheet omits a number of important features such as areas of woodlands
and plantations, (some of which are ancient woodlands and provide screening, containment and form visual
boundaries). Hedges, fences, footpaths and reference to the bypass were not recorded. The assessment sheet also
refers to parkland and that the majority of the land is amenity land lacking management. A wide long view(s) out to
the south is highlighted as a key feature which is correct when looking south from a small part of the area but elsewhere views are contained and obscured by landform and vegetation. The record sheet includes a photograph of the view south but this is not taken from the recreation ground as recorded on the map Figure 52. The photograph was taken from private land on the footpath. 7.3.5 In the visual appraisal section of the assessment sheet it records the local receptors as amenity land and houses, types of view as long views from top of ridge to the south and visual barriers as landform / trees and hedges. It concludes that the sensitivity is high (see table 7.1 below). It is acknowledged that there are views within the area but these tend to be short partial or glimpsed views with long views out towards the south from high ground in the north eastern parts of character area. Views into the area are very limited and development within the area would have a minimal impact on views. However, in views from the ridge to the south the recreation occupying the north eastern parts of the character area is seen whilst the remaining areas are hidden from view and therefore the visual sensitivity of the majority of the area is low. 7.3.6 The resultant evaluation of this area was considered as follows: Table 7.1: Landscape Study Assessment, Maresfield Area A Character Area Maresfield A Quality Good Value Medium Sensitivity to Change Moderate Visual Sensitivity High Management Opportunities Mange hedges and grazing. Mange recreational spaces and access to countryside. Need to retain gap between Maresfield and Uckfield. Potential for Mitigation Low Planting would change open character and obscure long views out from recreation ground Capacity to Accept Change: Housing Low Close to village edge only Capacity to Accept Change: Business Low 7.3.7 We contend that the record sheets are incorrect and the judgement on quality / condition is erroneous and should be ‘ordinary’ as most of the land is unmanaged comprising rank grassland of little intrinsic landscape value and the visual sensitivity of the area is ‘moderate or low’ due to the strong enclosure afforded to the area. It is interesting to note that one of the management opportunities is to retain a gap between Maresfield and Uckfield although there is no planning policy support for the retention of gaps in the Core Strategy or previous Non Statutory Wealden Local Plan. 7.3.8 By comparison, another example is Character Area L – land to the west of Uckfield, which is described as: ‘Land sloping away from urban edge to Uck valley and A26 Uckfield by pass. Strong field structure with arable and pasture. Some large fields. Sewage works detractors. Few focuses of character. Development would need a well defined edge to prevent creep’. 7.3.9 The assessment sheet for this character area has recorded the land cover and landscape elements correctly but has not recorded any landform features and relatively few aesthetic factors, although it describes the land as sloping away from the urban edge with a strong field structure with arable and pasture. The landscape condition is considered to be fair which is not defined in the methodology although this changes to ordinary in the comparison table. 7.3.10 In the visual appraisal section of the assessment sheet it records the local receptors as countryside on the other side of Uck Valley, isolated properties, footpaths and A26 and houses on the urban edge, types of view as views across to woods at West Park / Butchers Wood, wooded ridge of Shortbridge across Uckfield Valley and visual barriers as few. It concludes that the sensitivity is ‘moderate’ (see table 7.2). Table 7.2: Landscape Study Assessment, Uckfield Area L Character Area Uckfield L Quality Ordinary Value Medium Snaw Accessible for recreation Sensitivity to Change Moderate Visual Sensitivity Moderate High on ridge Management Opportunities Mange urban fringe. Farm diversification pressure. Manage wood and existing trees and hedges Potential for Mitigation Moderate Low on ridge as need to retain open fields Soften urban edge. Create green network. Relocate recreation ground Capacity to Accept Change: Housing Moderate Need well defined boundaries close to urban edge avoid high ground Capacity to Accept Change: Business No capacity 7.3.11 We contend that the record sheets are incorrect and the judgement on quality / condition is underestimated and should be ‘good’ as most of the land is attractive farmland landscape with some distinctiveness features with a recognisable landscape structure. The assessment sheet ignores the open exposed nature of this character area, with long views south and west and numerous views in to the area from the surrounding countryside (roads and footpaths), and therefore the visual sensitivity of the area should be ‘high’ due the number of viewpoints where views can be obtained. This can be compared to the Maresfield A area which is considered to have ‘high’ sensitivity rating but with a few vantage points available where development impacts will be perceived. 7.3.12 We also note that under management opportunities it is considered that the area could contribute to managing the urban fringe, which could equally apply to the land at Maresfield, and that under the potential for mitigation heading is considered that the area has a ‘moderate’ ability, although the introduction of mitigate planting as shown Figure 11 of the landscape Study would dramatically and significantly change the landscape character of the area. 7.3.13 These examples illustrate the inconsistency of the landscape assessment record sheet and the arbitrary nature of the judgements made. It does not give any confidence to the manner in which the Landscape Study has been undertaken or to the transparent way that the judgements have been reached. 7.4 Implications for the soundness of the Core Strategy 7.4.1 We have reviewed the ‘Landscape Character Assessment and Development Option Evaluation Study’ of the district. It is not clear how this Landscape Study has been used to inform the spatial strategy as it is not specifically referred to in the Core Strategy, nor is the Landscape Study listed as a background paper at paragraph 1.7 of the Core Strategy (although it is included as a background paper on the Councils website). 7.4.2 We have reviewed the methodology set out in the document and we have also reviewed whether the methodology has been consistently applied resulting in a final report that is robust, thorough, and transparent and that it would form a credible evidence base suitable to inform the spatial strategy contained in the Core Strategy. The Study also includes a methodology employed to undertake a comparative evaluation of a potential development area within a character area which has capacity to accommodate development. 7.4.3 The examples referred to in our analysis above illustrate the inconsistency of the landscape assessment record sheets and arbitrary nature of the judgements made and it does not give any confidence to the manner in which the
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Landscape Study has been undertaken or to the transparent way that the judgements have been reached. 7.4.4 We contend that the Landscape Study is flawed and therefore the assessment of housing sites in the district, the spatial strategy and the Councils Sustainability Appraisal is unsound. In addition, in relation to the comparison assessment of sites within the district surrounding the towns and villages; we contend that this comparative assessment of character areas is flawed as the starting point for the assessment the landscape sensitivity / capacity analysis is unsound for the reason given above. 7.4.5 The Core Strategy proposes that the land to the west of Uckfield be identified as a ‘strategic development area’ suitable for accommodating 1,000 homes and some 12,650 sq metres net of employment floor space and education provision as an extension to the urban area to the west of New Town. In the light of the comments made on the Landscape Study, it is considered that this proposal be reassessed and, (taking into account the other representations made on other parts and policies contained in the Core Strategy), greater emphasis be given to the suitability of land at Maresfield to accommodate increased housing numbers and a larger proportion of the housing requirements for the district. 7.4.6 Policy WSC13 relating to Green Infrastructure is supported although it is considered that the anomalies and errors in the Landscape Study be addressed before this document is used to inform and guide the implementation of Green Infrastructure Strategy and also formulation of the specific measures for the protection and enhancement of the landscape which are to set out in the Delivery and Site Allocations DPD referred to at paragraph 7.28 of the Core Strategy.

Details of Changes to be Made:
SUMMARY 7.4.7 In conclusion, we contend that the Core Strategy is unsound because: 1. It is not justified as it is not based on a sound evidence base as the Landscape Study (Landscape Character Assessment and Development Options Evaluation Study of the District) is flawed and therefore the assessment of housing sites in the district, the spatial strategy and the Councils Sustainability Appraisal is unsound. It is not clear how the Landscape Study has been used to inform the spatial strategy as it is not specifically referred to in the Core Strategy nor is the Landscape Study listed as a background paper at paragraph 1.7 of the Core Strategy; 2. It is not justified because the Landscape Study as it is not robust, thorough, and transparent and that it does not form a credible evidence base suitable to inform the spatial strategy contained in the Core Strategy. The Landscape Study contains a number inconsistencies set out in the landscape assessment record sheets and contains a number of arbitrary judgements and so it does not give any confidence to the manner in which the Landscape Study has been undertaken or to the transparent way that the judgements have been reached 3. It is not consistent with national policy as the methodology for undertaking the Landscape Study (which has been used to inform the spatial strategy) refers to ‘AONB and AONB Buffer Zones’ as a way of identifying higher value landscapes. There are a number of reasons why this approach is unsound but there is no Government policy support for the concept of ‘AONB buffers’ in Planning Policy Statement No.7 or any other policy guidance.
2.1 Introduction 2.1.1 This section of our representations relates to the housing growth figures set out within the draft Submission Core Strategy. Our representation is summarised below: Section of Core Strategy: Spatial Planning Objective 3 (SPO3) and Policy WCS1 Provision of Homes and Jobs 2006-2030Legally Compliant: - Sound: NoJustified: NoEffective: NoConsistent with national policy: - 2.1.2 In making this representation there are a number of separate but inter-related issues to raise: § The Council have taken the opportunity presented by the ‘Dear Chief Planner’ letter of July 2010 regarding the revocation of the South East Plan to reduce the scale back the required quantum of new housing in the district over the Plan period to the Option 1 RSS figures. However, evidence used to inform the South East Plan is still valid and suggests that a higher growth figure is required. Indeed, the South East Plan itself acknowledged that the level of growth within it was below forecast growth. § Published data regarding housing growth, need and demand shows that this outstrips the quantum of development allocated in the submission Core Strategy. The submission Core Strategy does not acknowledge how this has been reconciled and why a lower figure has been set in the Core Strategy. § The Core Strategy establishes a minimum housing growth figure of 400 units per annum, based on historic delivery. § Whether the 400 units per annum is a maximum or minimum § Why the scale of growth allocated to the villages, and Maresfield in particular, has reduced so significantly between 2007 and 2011. 2.1.3 These issues are discussed in the following sections. 2.2 Reverting back to the RSS Tier 1 Figure 2.2.1 The ‘Dear Chief Planner’ letter from CLG to all authorities dated July 2010 states that ‘evidence that informed the preparation of the revoked Regional Strategies may also be a material consideration, depending on the facts of the case’, and ‘authorities may base revised housing targets on demographic information, that the Council should not simply roll back to the option 1 figures. Taking each in turn: (i) South East Plan Panel Report 2.2.3 The recommendations of the Panel were made based on the availability of technical evidence and material submitted to them. Importantly, they were not an expression of political will or influence. 2.2.4 The Panel noted that draft South East Plan housing level for the Rest of East Sussex area – including the north of Wealden - was at the lower end of the 300-500 dpa range included in the consultation draft RSS, January 2005, and that the district-wide rate proposed for Wealden was significantly below provision levels in the last structure plan. 2.2.5 The panel also noted that the proposed distribution of housing for the Rest of East Sussex area, following consultation in September 2005, was termed “balanced dispersal”, and takes account of the role and accessibility of each rural settlement moderated by environmental designations. The Panel noted that this appeared to be a sound approach. 2.2.6 However, the Panel considered that a modest increase (600 dwellings equating to 30 dpa) could be justified in the rest of Wealden focused on Uckfield. Recommendation 26.6 stated that, ‘In the rest of East Sussex, add 600 dwellings (30 dpa) to the rest of Wealden based on the potential for sustainable growth at Uckfield’. 2.2.7 So, the Panel recognise the importance of Uckfield as a focus for growth and that this should be in accordance with the balanced dispersed growth strategy which they considered to be sound. 2.2.8 The Core Strategy should not ignore these recommendations. 2.2.9 The Panel report makes specific reference to the technical evidence submitted by Wolf Bond Planning LLP (respondent no. 7095) in regard to Matter 9D of the South East Plan EIP (session date 9 March 2007). Their evidence made the point that the ‘option 1’ figures: § failed to result in a step change in housing supply, rather they resulted in an overall reduction against previous Structure Plan targets; § result in the provision of even fewer affordable homes; § failed to sully explore the potential to provide additional housing growth in sustainable locations previously approved; § artificially constrained housing supply – particularly around Uckfield – and prevented otherwise suitable land coming forward for development; and § did not recognise that Uckfield is unconstrained by environmental designations – unlike most of Wealden – and thus represents the principal and most suitable location to accommodate additional housing in the rest of the East Sussex area during the plan period. 2.2.10 In our response to the Council’s Core Strategy consultation (July 2009), we noted that Maresfield has a major role to play in contributing to the future growth and development of the District, particularly in relation to the housing requirements for the Low Weald area and identification of Uckfield as a growth location. We noted: § Uckfield is an area that was identified for housing growth in both the South East Plan and the East Sussex Structure Plan, but Uckfield itself has environmental and physical constraints to growth. § A strategy of balanced dispersal (as advocated in the South East Plan and the Panel Report) would point to Maresfield as a sustainable location for some growth that cannot be accommodated
sustainably within Uckfield town. Maresfield could make a sustainable contribution to delivering the housing needs of the Uckfield area. § The shortage of previously developed land due to the rural character of the District, necessitates greenfield release, and Maresfield represents a relatively unconstrained location for development (compared to the majority of the district). § Maresfield has a range of facilities that meet the day to day needs of residents and benefits from a close proximity to Uckfield with the potential for significantly enhanced accessibility by sustainable modes. § Community representatives support a comprehensive, holistic approach to development at Maresfield rather than a piecemeal development that offers little community benefit. 2.2.11 Maresfield benefits from a sustainable location close to Uckfield; a town identified for significant housing growth within the South East Plan. We contend that Maresfield can play a positive role in delivering the aspirations for the Uckfield area, and in doing so the settlement will benefit from a clear long term framework for its long term future. Further, if the strategic role of the village is not recognised in the Core Strategy there is a real threat of small scale, piecemeal development will occur in the village which would fail to bring the benefits associated with a sustainable long term strategy. 2.2.12 In summary, we contend that, in reconsidering the growth figures for the District following the ‘Dear Chief Planner’ letter of July 2010, it is not appropriate for the council to ignore the recommendations of the South East Plan Panel, whose decisions were based on technical evidence. Their recommendations should be reflected in the Core Strategy. 2.2.14 The South East Plan still comprises part of the development plan and the policies within this need to be considered. The South East Plan sets a housing requirement of 11,000 homes to be provided in Wealden over the period 2006-2026 at an average of 550 homes per annum. However, the South East Plan states that in relation to housing requirements: ‘the level that is set here [i.e.: in the plan] is still significantly below the forecast growth of households and even more so by the more recent 2006-based population projections’ (paragraph 7.6). 2.2.15 It goes on to say that: ‘the review of this RSS will examine the current levels of housing and a rate of provision higher than 32,700 dwellings per annum is likely to be necessary to meet the strategic needs in the region’. 2.2.16 So, the RSS itself acknowledges that the housing figures for the area were being suppressed and that higher targets should in fact have been set. This point is made in Wealden’s own Housing Market Assessment. At paragraph 1.23 it states that: ‘trend based projections predict growth of 700 households per annum in Wealden district over the next 20 years. This is around 20% more than the target dwelling provision set for the district in the draft South East Plan (550 dwellings pa).… The data therefore suggests that in an unconstrained market, demand for new housing in North Wealden would exceed current dwelling targets’. 2.2.17 The Housing Market Assessment recognises the importance of regional policy interventions rather than purely using trend forecasting, but it also acknowledges the linkages between housing growth, job creation and economic activity. The report notes (at para 1.32) that Wealden, and the north of the district in particular, is an area where ‘job and workforce growth has been buoyant in recent years’. In this context, the report notes that ‘the lower rates of housing development proposed for North Wealden are likely to mean that the area will continue to experience pressure within the housing market in the future’. SUMMARY 2.2.18 We contend that the Core Strategy is unsound, because it is not justified, as it is not consistent with the policy and evidence set out in the South East Plan and the Council’s own Housing Market Assessment. (iii) Availability of new Information and Data / Household Growth 2.2.19 In November 2010 CLG published its most recent household projections, for the period 2008 – 2033. This data shows that by 2026, the number of households in Wealden is expected to grow to 73,000: a 12,000 increase from 2006. 2.2.20 The CLG Housing Statistics release states that: ‘The projections are an important part of the evidence base for assessing future housing demand and informing national and local policies on housing and planning’. 2.2.21 And: ‘Planning Policy Statement 3 requires that assessment of future housing requirements in local strategies should have regard to, amongst other factors, current and future demographic trends and profiles and take into account evidence including the Government’s latest published household projections’. 2.2.22 Although published in advance of the proposed submission Core Strategy, no reference to this information is made in the proposed submission draft. 2.2.23 The figures are lower than previous data sets – including that produced by the DCLG and used to inform the Councils Housing Market Assessment, 2007 – but are reflective of recent economic circumstances and thus take a more cautious approach to future housing growth and demand. However, the figures are substantial, and are in excess of the level of housing planned for in the Core Strategy. It is entirely unclear how these have informed the level of growth. 2.2.24 Technical Note 5 to the South East Plan explains how household projections are converted into dwelling numbers. The Chelmer Model of long-term migration projections derives a household to dwelling ratio of 1.03. Using this ratio, the most recent CLG household projections (12,000 additional households 2006-2026) would result in a need for 12,360 new dwellings over the same period. This equates to an annual average of 618 new homes across Wealden: 218 per year more than the proposed submission Core Strategy plans for. 2.2.25 In addition to overall housing numbers is the important issue of affordable housing. The proposed submission Core Strategy acknowledges that provision of affordable housing is a priority. However, across the district, the number of affordable units required on a per annum basis far exceeds the level of growth set out in the housing trajectory. 2.2.26 The Council’s Housing Needs Assessment (January 2010) estimates that there are currently 1,215 households in need of affordable housing across the District but that there is only an estimated 325 properties available to offset this current need. In addition to current need, the Housing Needs Assessment also addresses future need. This states (at para 6.42): ‘The data suggests that on an annual basis there will be 152 newly forming households requiring affordable housing and a further 831 existing households. The total future need for affordable housing is therefore estimated to be 983 units per annum’. 2.2.27 So, not only is the Core Strategy planning for the provision of fewer homes than is needed, it will not deliver on its priorities for affordable housing. 2.2.29 The Core Strategy should thus be
reviewed and amended to reflect the housing demand indicated by the household projections and need, and the implication for their spatial distribution considered. 2.3 Housing Trajectory – 400 units per annum 2.3.1 There are two issues to address here, (i) whether the targets are minima or maxima, and (b) justification for the 400 unit per annum target: (i) Minima or Maxima 2.3.2 We note that policy SPO3 states that ‘we will provide for at least 9,600 homes within Wealden….. on average 400 dwellings per annum’. Policies and supporting text elsewhere in the plan also make reference to the level of housing being ‘at least’ (see, for example, para 5.3). 2.3.3 Through the use of the term ‘at least’ we welcome the recognition that housing figures should be treated as floors rather than ceilings. They are in effect minima. This is in line with advice from PINS (Advice Note 1062, May 2008): that housing targets are to be regarded as floors and not ceilings and if suitable sites for housing come forward which are not allocated in plans, that to be seen as a bonus and not detrimental. The South East Plan also recognised this. It stated, at para 7.8: ‘the fact that an annual provision or local trajectory number has been met should not in itself be a reason for rejecting a planning application. Decisions should be taken on their merit and local circumstances – including longer term housing needs and affordability in an area’. 2.3.4 We support the fact that housing targets in the Core Strategy are minima, but are concerned as to how this will be interpreted, particularly given experience elsewhere in the district where the Council are using completions and housing land supply as a means to refuse planning applications. 2.3.5 In respect of establishing minimum housing targets, we consider the Core Strategy sound, albeit that the minimum figure of 400 units per annum should be greater. However, if the housing figure established in the submission Core Strategy is truly a minima, then planning applications that provide housing over and above this level must be determined on their merits: they can not be refused simply because the annual housing target has already been met in the district. We request that this is clarified within the Core Strategy. (ii) Rationale for 400 units per annum 2.3.6 Para 5.13 of the submission Core Strategy states ‘over the last 21 years on average 400 dwellings have been built per annum across the District… It is considered that a similar rate in the future is achievable’. 2.3.7 We do not agree that this is an appropriate rationale for the housing trajectory. Over the last 21 years the rate of delivery has fluctuated dramatically. Over the last ten years there has been a history of underperformance when compared to structure plan, the South East Plan and local plan targets. Indeed, there is a ‘backlog’ of housing delivery against these plan targets. Over the period 1991 – 2009 there have been 7,320 completions across the district. This is set against a requirement for 1.9,240 homes based on Structure Plan (and thus Local Plan) figures for the same period, 2.8,250 homes based on the Structure Plan targets up to 2006 and the adopted South East Plan targets for the remaining period (2006 - 2009), or 3.7,800 if the adopted South East Plan figures are replaced with the South East Plan tier 1 figures. 2.3.8 At the recent inquiry relating to the Honey Farm site in Polegate in the south of the district, the Council and the appellant agreed the base for completions across the district for the four and a half year period running from April 2006 – September 2010. There were 1,642 completions over the period. This is a shortfall against both the Core Strategy (of 158 units) for that period, and the South East Plan (833 units). Perhaps more significantly, it represents a significant shortfall against the projections contained within the Councils own Housing Market Assessment. As noted previously, this predicted growth of 700 households per annum in the district. Against this, the appellants demonstrated a shortfall of 1,508 units for the period April 2006 – September 2010. 2.3.9 Underperformance against targets has not been helped by the lack of an up-to-date local plan and associated identified and allocated development sites (The 1998 Local Plan and its saved policies are still being used for development control purposes) and the focus on reusing brownfield land, which restricted housing development in places characterised by their countryside setting, such as Wealden. Recent Ministerial Statements now make it clear there will be a presumption in favour of sustainable development and the intention is to increase housing delivery. There is also no brownfield target that may constrain development in places such as Wealden. 2.3.10 Interestingly, delivery rates in Wealden in the last few years have been their highest for some time, despite the economic climate. The Core Strategy now provides the opportunity not only to address previous underperformance but to proactively plan for the future. So why does the housing trajectory seek to constrain the market in Wealden at the very time when it is showing it can actually delivery increased levels of new homes? Establishing a figure of 400 units per annum, based on historic delivery, is an artificial constraint. The fact that there has been historic underperformance in housing delivery in the district should not be a determinant of what the future level of growth should be. 2.3.11 The annual housing requirement must also be assessed in light of housing need and demand, to which we have referred in section 2.2 above. This demonstrates that housing growth should be in excess of that identified in the Core Strategy. This also needs to be set in the context of historic undersupply against previous Structure Plan targets, resulting in a backlog of housing. So, the 400 per unit target is artificially low and should be increased. 2.4 No justification / rationale provided for changes to growth figures allocated to Maresfield between 2007 Issues and Options and 2011 Proposed Submission Draft 2.4.1 The 2007 Issues and Options Core Strategy identified that the potential scale of growth in Maresfield was between 350 - 500 new homes. Consultation responses to this (option 21a of the Issues and Options draft) received both support and objection. 109 responses were received. 2.4.2 The Maresfield Conservation Group agreed with the level of growth, though stating that ‘any development should be carefully planned in terms of traffic management, sensitive integration with the village and energy saving’. 2.4.3 Other respondents (for example, respondent ID: 107127) noted: ‘Agree as this site has well defined and defensible boundaries, is next to an employment site, near to 2 stations and traffic is easily dispersed by the village roundabouts, there is little landscape quality to the site’. 2.4.4 The chart copied below has been extracted from the paper prepared for Agenda Item 8, WDC Cabinet Local Development Framework Sub Committee, 15th October 2007. As expected, both support and objection was made in regard to the quantum of growth identified for
Maresfield. However, what is important is that the majority of responses - almost 60% - were in support (see column titled option 21a). What is perhaps even more significant here is that of the Villages around Uckfield where a question about growth was posed in the 2007 Issues and Options, the only one that received a majority in agreement with the specified level of growth was Maresfield. So why was this ignored? Figure 2.1: Summary of Consultation Responses: 2007 Core Strategy Issues and Options, Option 21 Source: page 82, Agenda Item 8, WDC Cabinet Local Development Framework Sub Committee, 15th October 2007 2.4.5 The 2009 Spatial Options Core Strategy presented six options for growth across the district. This dramatically reduced the potential for growth in Maresfield to between 11 and 150 new homes. None of these are for the same level of growth as in 2007. Given that the majority of responses to the 2007 consultation indicated support for the level of growth identified (between 350 – 500 homes) it is not clear why the decision was made to reduce the potential growth figure by more than half. There should have at least been some acknowledgement of the previous figures and this should have been presented as an option. 2.4.6 The only rationale we can see for reducing the potential level of growth in Maresfield is in regard to the settlement hierarchy, which, between 2007 and 2009, changed the status of Maresfield from a ‘local centre with growth potential’ to an ‘accessible settlement with limited facilities’. As we point out in section 3.1 of this response, the settlement classification significantly underplays the potential of Maresfield, ignoring, for example, the fact that a very real opportunity exists to balance homes and jobs in the area given the planning permission granted for the Ashdown Business Park, which will generate between 600 – 700 jobs in what has been termed ‘the most strategically significant employment site in North Wealden’. 2.4.7 Based on consultation responses to the 2009 spatial options, the submission Core Strategy now sets the housing figure for Maresfield at just 50 units. This represents just 10 percent of the originally identified potential for Maresfield. It is not clear what the rationale and justification for such a significant reduction is. We note that responses made by Maresfield Parish Council to the 2009 spatial options Core Strategy note that the Parish would accept up to 50 units in Maresfield, but that greater than 50 would be considered acceptable if substantial local benefit can be demonstrated / delivered. 2.4.8 The biggest change to the level of growth was made between 2007 and 2009. Conversely, this is when housing figures in the South East Plan were in the process of being increased. There does not appear to be any evidence to suggest why the housing figure in Maresfield should be reduced so dramatically: indeed, submissions made to the 2007 consultation expressly state that a limited number of 300 units should be accommodated in Maresfield (see page 163 of Agenda Item 8, Appendix C, Technical Summary of Issues Raised through the Issues and Options Consultation Process, Cabinet Local Development Framework Sub Committee Date: 15th October 2007).

Details of Changes to be Made:
SUMMARY 2.2.13 Having ignored these recommendations, we contend that the Core Strategy is unsound, because it is not justified, as it is not founded on the evidence available and considered robust by the independent Panel conducting the examination in public of the South East Plan. (ii) Adopted South East Plan SUMMARY 2.2.28 We contend that the Core Strategy is unsound because (i) it is not justified as it is not based on the available evidence which points to a need for substantially more homes to be provided across the district and, furthermore, does not explain how this has been taken into consideration; and (ii) it is not effective, because the level of housing growth set out will mean the plan can not deliver on its priorities to deliver affordable housing. SUMMARY 2.3.12 We thus contend that the Core Strategy is unsound because (i) it is not justified as does not accord with the evidence base, which indicates higher rates of housing delivery is required and (ii) it is not effective because it is not deliverable: simply achieving 400 units per annum will not deliver the quantum of growth required to meet the requirements in the district. SUMMARY 2.4.9 In summary, we contend that the plan is unsound as the housing growth is not justified as it does not appropriately reflect the evidence base.

Details of Reasons for Soundess/ Legal Complaince:
"Supplementary documents have been submitted but not attached, and may be viewed at the Council offices on request". SPO3. Increase the total number of dwellings to be built as set out in in section 1.2.

Details of Changes to be Made:
REVISION SOUGHT Amend number of dwellings to be delivered from 2006 to 2030 to 13,200 at an average of 550 dwellings per annum
### Details of Reasons for Soundess/ Legal Complaince:
The proposed total of 9,600 houses is not justified by the evidence base. The proposed phasing figure is arbitrary and unsubstantiated. Crowborough is in need of stimulation of investment as much as the other higher order settlements and should not be downgraded. Housing need will not be met by the Plan as it currently stands. There is no reference to wider needs outside the District.

### Details of Changes to be Made:
The housing numbers should reflect the SE Plan housing provision figures and provide 11,000 dwellings in the period 2006 - 2026. This accords with a more robust evidence base. Links between the evidence base and conclusions on phasing need to be re-visited and strengthened. The role of Crowborough needs to be elevated. It is difficult to see how this can be achieved simply by amendments to the submitted plan.
Herstmonceux Parish Council SP03 Herstmonceux Parish Council supports the statements relating to the delivery of infrastructure particularly in respect of development in Herstmonceux and Hailsham. However, although the document notes the intent, Wealden District Council is not capable of the delivery of the schemes as these are the functions of other bodies. If there are procedures in place for Wealden District Council to materially influence the delivery of infrastructure, explicit details of how it will be achieved should be listed. 1. The problems of the A271 are clearly detailed on Page 39 point 6.15 and in the Hailsham and Hellingly Masterplan and in ESCC reports. However, any changes/improvements will be the responsibility of ESCC Highways and outside the remit of Wealden District Council. As funding from S106 agreements is unlikely to be sufficient to fund any major changes, this issue should be addressed before extra housing is built. 2. Sewage capacity is insufficient to cope with any increased demand as noted on Page 39 point 6.16 and Page 41 Point 11 and also raised in Herstmonceux Parish Council's response to the Spatial Options Consultation in August 2009. 3. Water - the Parish Council repeats its concerns about the provision of water for the district which has previously suffered problems with water shortages as was shown by the need to implement hosepipe restrictions in 2006/7. The increased demand from extra housing completed since that date and by the current building schemes will add to the problems. Any measures taken to expand the capacity will take many years to implement. 4. Herstmonceux C of E Primary School would not be able to accommodate any significant increase in pupil numbers; the present Year 1 class already has 39 children and who started in the school in September 2009, exceeding the ESCC guidelines of 30 pupils. The problems associated with these high numbers both in teaching and of physical space will continue through the subsequent school life of these children. This point was also raised in the Parish Council's response to the Spatial Options Consultation in August 2009, which noted that the ESCC Report on Primary Schools 1 May 2009 stated that the current site of the school is too small for the pupil numbers and it has insufficient outside space for the children. There are no current plans to build or expand the school to proved extra school spaces for new families. 5. Hailsham Community College, the nearest secondary school to Herstmonceux Parish has already been identified in an ESCC report as being too small for the current size of the college intake. Current building programmes in Hailsham will increase the pressure on space at the college, and so the issue of school capacity should be addressed with some urgency. Herstmonceux Parish Council is concerned that contributions under S106 Agreements for the acquisition of land and contributions for building costs for both a new secondary and a primary school in Hailsham have been returned to developers. Based on 2009 figures East Sussex County Council had stated that sufficient capacity for the expected rise in school numbers could be met by an increase in class sizes or the provision of some temporary classrooms. this decision appears to contradict ESCC guidelines on class sizes and could have a negative effect on children's education. The increase in housing detailed in the Core Strategy for the period up to 2030 will generate a need for several hundred more school places, and so it is important that issue of identifying sites for new schools is undertaken urgently. The Parish Council hopes that as approximately 1700 of the proposed dwellings for Hailsham are already approved, sufficient contributions will be available for the remaining 1300 to ensure an improvement in this vital infrastructure requirement for the future growth of this area. 6. Herstmonceux Parish Council supports the need for a mix of housing in the parish with a particular need for supported housing for older residents. SP07 Herstmonceux Parish Council expresses concern that the current public transport service to Herstmonceux is inadequate for residents as it only provides a limited hourly service. There are no buses in the evenings or on Sundays, and so it is not possible to reduce the need to travel by car. Page 41 6.19 (8) and (9)

Details of Changes to be Made:
Summary of all Representations - Proposed Submission Core Strategy Regulation 27 - Report 11th July 2011

Representation ID
1729

Person ID
522397

Agent ID
344515

Box 4

Sound
☑ Yes ☐ No ☑ Justified ☑ Effective ☑ Consistent with national policy

Legally Compliant
☐ Yes ☐ No

Details of Reasons for Soundness/ Legal Complaince:

Housing target is not justified by robust evidence. SECTION FIVE - HOUSING PROVISION 5.1 In this Section we set out our comments in response to Policy WCS1 and specifically regarding the provision of homes. 5.2 Policy WCS1 proposes a provision of 9,600 dwellings in Wealden District over the period 2006 - 2030, equivalent to 400 dwellings per annum (dpa). This represents a locally-derived target which is explained in para. 3.11 of the Consultation document to be based on estimates of capacity and community aspirations. This proposed level of provision must be compared with the intention of the South East Plan whereby housing provision of 550 dpa was proposed. 5.3 National policy emphasises the need to increase the provision of housing overall and in particular so as to achieve a wider choice and improve affordability. Thus, whilst it is the intention of Government policy that Local Authorities should decide their own housing targets, these must continue to be justified by robust evidence. This point was emphasised in the CLG Guidance dated 6th July 2010 (pursuant to the purported abolition of RS). National policy (PPS12 para. 4.52) continues to require Core Strategies to be "justified, effective and consistent with national policy". 5.4 PPS3 identifies the range of considerations that need to be taken into account in determining the appropriate level of housing at Local Authority level. Para. 33 states: "Regard should be had to evidence including Strategic Housing Market Assessments, the latest Household Projections, Strategic Housing Land Availability Assessments, affordability and the impact on infrastructure." 5.5 In light of the Council's proposal to reduce significantly housing provision in the District, it is therefore instructive to compare the results of recent Household Projections published by the Government. Sub National Household Projections Wealden Household Growth 2006 - 2026 Wealden Household Growth 2006 – 2030** 2004 Base + 14,000 N/A 2006 Base + 14,000 N/A

5.6 Thus it can be seen that whilst the latest projections imply a slightly lower level of household generation than at the time the South East Plan was issued, the projection is still substantially above the housing provision included in the South East Plan, and therefore even higher than that proposed in Policy WCS1. Other indicators (national and local) similarly point to a need for housing provision at a higher level. 5.7 Using the 2008-based data and adding a 3% allowance for vacancies indicates a locally-generated demand within Wealden District of 15,450 over the Plan period. 5.8 At para. 3.10 of the Core Strategy, the Council identifies a trend-based projection of 16,800 households, slightly higher than this. Based on the lower of the two figures, the Council proposes to make provision for only 62% of the requirement. 5.9 Furthermore, the Council has not provided any robust evidence as to why a higher figure should not be proposed. Moreover para 3.10 of the Core Strategy confirms that suitable, available and achievable sites to meet this need have been identified in the SHLAA.

Details of Changes to be Made:

5.10 Accordingly we submit that Policy WCS1 is unsound and that a housing provision of at least 550 dpa (13,200 over the period 2006 - 2030) should be proposed. Housing target is not justified by robust evidence.
### Representation ID

1763

<table>
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<tr>
<th>Person ID</th>
<th>Mr Keeley</th>
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<tr>
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### Sound

- Yes ☐
- No ☑
- Justified ☑
- Effective ☑
- Consistent with national policy ☑

### Legally Compliant

- Yes ☑
- No ☐

#### Details of Reasons for Soundess/ Legal Complaince:

Housing We develop as proposed as in the core strategy we will continue to build some awful estates which I believe are the Cause of family breakdown, depression, mental health issues, vandalism as these estates are lacking in open space and open marketing housing makes most people have a mortgage that is beyond their means, again may I refer you to look at my campaign for change document under land community trust we should not allow developers to build what they want buy they should be instructed to build what is needed, we cannot have open market housing with part time jobs. In the document it states that there is a need for 812 affordable dwellings annually, it then goes on to say that Wealden will deliver 400 homes per year, whilst some of these may be called affordable but in reality they are not and the vast majority of those on the market can bring more people in to the area putting more pressure on social services and school placements. We should stop building open market housing for the life time of this planet.

#### Details of Changes to be Made:

Conclusion Whilst the strategy plan will appear to have a lot of effort put into it, as it stands it would be a disaster if implemented and I would like to see the secretary of state to call in a public inquiry.

### Representation ID

41

<table>
<thead>
<tr>
<th>Person ID</th>
<th>Mr Courtley</th>
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<td>513493</td>
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<td>Agent ID</td>
<td>Mr Courtley</td>
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### Sound

- Yes ☐
- No ☑
- Justified ☑
- Effective ☑
- Consistent with national policy ☑

### Legally Compliant

- Yes ☑
- No ☐

#### Details of Reasons for Soundess/ Legal Complaince:

The Council should extend its ambition for the 5 growth settlements such that it includes improvements to Stone Cross & Polegate so that local retail and service functions will provide District level services.

#### Details of Changes to be Made:

### Representation ID

132

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</table>

### Sound

- Yes ☐
- No ☑
- Justified ☑
- Effective ☑
- Consistent with national policy ☑

### Legally Compliant

- Yes ☑
- No ☐

#### Details of Reasons for Soundess/ Legal Complaince:

The Council should recognise the the settlement of Hailsham/Hellingly requires significant investment only likely to be achieved through contribution from major development. 1300 dwelling is well below the commercial threshold capable of delivering the improvements needed. The settlement of north Hailshem/Hellingly is capable of providing greater connectivety to Hailsham if land at Park farm is allocated for possible housing, employment and parkland boundary preserving the setting of the Hospital site.

#### Details of Changes to be Made:

Increase the housing allocation at Hailsham/Hellingly to accord with the RSS and to improve sustainability and delivery of an area of strategic importance to meeting the needs of the Hailsham/Hellingly community.
Summary of all Representations - Proposed Submission Core Strategy Regulation 27 - Report 11th July 2011

Representation ID
829

Person ID  Mr & Flittner
106034

Agent ID
Box 5

Sound  ☑ No  ☑ Justified  ☑ Effective  ☑ Consistent with national policy

Legally Compliant
☐ Yes  ☐ No

Details of Reasons for Soundess/ Legal Complaince:
Objections have been made to the appropriate policy as set out in detailed submissions.

Details of Changes to be Made:
Any changes made to the CS due to objections will need to be reflected in the wording of this spatial planning objective.

Representation ID
1183

Person ID  Miss Heron
534582

Agent ID
Box 5

Sound  ☑ No  ☐ Justified  ☐ Effective  ☐ Consistent with national policy

Legally Compliant  ☐ Yes  ☐ No

Details of Reasons for Soundess/ Legal Complaince:
There is no justification within the evidence base for directing more substantial investment to Uckfield and Hailsham than to Heathfield. The town plays an important role as a Service Centre and provides vital everyday facilities and services to its local community and its hinterland. Future investment for the long term vitality of Heathfield is therefore crucial to avoid decline of the town.

Details of Changes to be Made:
Direct greater investment in Heathfield
Vision and Spatial Planning Objectives - Support 2.1 We support the WDC’s Spatial Planning Objectives (SPO1 – SP15). We consider the Objectives promote sustainable growth and strike an appropriate balance to accommodate that growth given the environmental and infrastructure requirements of the District. The Objectives will support Wealden’s aspiration to retain its rural character and high quality environment whilst achieving sufficient growth to support its economy, regenerate market towns and tackle deprivation. 2.2 To meet the ‘justified’ test of soundness, “the most appropriate strategy when considered against reasonable alternatives” needs to be explored. PPS12 expands on this further: ‘the ability to demonstrate that the plan is the most appropriate when considered against reasonable alternatives delivers confidence in the strategy. It requires the local planning authority to seek out and evaluate reasonable alternatives promoted by themselves and others to ensure that they bring forward those alternatives which they consider the LPA should evaluate as part of the plan making process. There is no point in inventing alternatives if they are not realistic. Being able to demonstrate that the plan is the most appropriate having gone through an objective process of assessing alternatives will pay dividends in terms of easier passage for the plan through the examination process. It will assist in evaluating the claims of those who wish to oppose the strategy.’ (PPS12, para 4.38 – PPS12’s own emphasis shown in italics) 2.3 In order to provide for a suitable strategy that strikes the right balance, WDC has prepared an extensive Evidence Base which identifies and assesses the various options available to WDC. These options are reviewed within the Background Papers (BP), in particular, BP1: Development of the Proposed Submission Core Strategy (section 5) and BP10: Sustainability Appraisal of Proposed Submission Core Strategy (Table 1.2). The Background Papers demonstrate the ‘appropriateness’ of the current proposed strategy, that ‘reasonable alternatives’ have been tested and that the Spatial Planning Objectives are found on ‘robust evidence’ i.e. the visions are ‘justified’ as required by PPS12. 2.4 The previous Spatial Development Options (June 2009) Consultation tested up to six different housing scenarios to accommodate the South East Plan (May 2009) housing target. In the light of the revocation of the RSS paragraphs 5.9 and 5.10 of BP1: Development of the Proposed Submission Core Strategy set out the steps which were addressed in determining the overall revised quantum of growth and the suitability of the proposed locations to accommodate this growth: ‘The Local Strategic Partnership focused upon meeting housing needs across the District, whilst Parish and Town Council’s within Wealden provided information on local growth issues and preferences’. This is further explored in paragraphs 5.11 – 5.37 and Section 7 of BP1: Development of the Proposed Submission Core Strategy including an assessment of the settlement hierarchy. 2.5 Section 8 of BP1: Development of the Proposed Submission Core Strategy is supported by section 8 of BP10: Sustainability Appraisal of Proposed Submission Core Strategy which in turn supports the Spatial Planning Objectives within the Core Strategy. The Options tested are considered realistic and are not ‘artificial’ as set out in paragraph 38 of PINS ‘Learning From Experience’ (Sept 2009) document, which states, ‘in some instances it appears that options are identified for the sake of having options rather than because they are realistic….if the options are limited there is no point in trying to artificially create them’. 2.6 The Spatial Planning Objectives therefore provide a clear vision and are specific to the challenges of the District. They are supported by the Evidence Base which has a clear audit trail, has tested all the reasonable alternatives and is therefore ‘justified’. Furthermore, the Objectives are consistent with National Policy including ‘emerging’ National Guidance contained in the Localism Bill (i.e. the level of housing has been determined by a locally derived need).
Summary of all Representations - Proposed Submission Core Strategy Regulation 27 - Report 11th July 2011

dividends in terms of easier passage for the plan through the examination process. It will assist in evaluating the claims of those who wish to oppose the strategy.’ (PPS12, para 4.38 – PPS12’s own emphasis shown in italics)

In order to provide for a suitable strategy that strikes the right balance, WDC has prepared an extensive Evidence Base which identifies and assesses the various options available to WDC. These options are reviewed within the Background Papers (BP), in particular, BP1: Development of the Proposed Submission Core Strategy (section 5) and BP10: Sustainability Appraisal of Proposed Submission Core Strategy (Table 1.2). The Background Papers demonstrate the ‘appropriateness’ of the current proposed strategy, that ‘reasonable alternatives’ have been tested and that the Spatial Planning Objectives are found on ‘robust evidence’ i.e. the visions are ‘justified’ as required by PPS12. 2.4 The previous Spatial Development Options (June 2009) consultation tested up to six different housing scenarios to accommodate the South East Plan (May 2009) housing target. In the light of the revocation of the RSS paragraphs 5.9 and 5.10 of BP1: Development of the Proposed Submission Core Strategy set out the steps which were addressed in determining the overall revised quantum of growth and the suitability of the proposed locations to accommodate this growth: ‘The Local Strategic Partnership focused upon meeting housing needs across the District, whilst Parish and Town Council’s within Wealden provided information on local growth issues and preferences’. This is further explored in paragraphs 5.11 – 5.37 and Section 7 of BP1: Development of the Proposed Submission Core Strategy including an assessment of the settlement hierarchy. 2.5 Section 8 of BP1: Development of the Proposed Submission Core Strategy is supported by section 8 of BP10: Sustainability Appraisal of Proposed Submission Core Strategy which in turn supports the Spatial Planning Objectives within the Core Strategy. The Options tested are considered realistic and are not ‘artificial’ as set out in paragraph 38 of PINS ‘Learning From Experience’ (Sept 2009) document, which states, ‘in some instances it appears that options are identified for the sake of having options rather than because they are realistic….if the options are limited there is no point in trying to artificially create them’. 2.6 The Spatial Planning Objectives therefore provide a clear vision and are specific to the challenges of the District. They are supported by the Evidence Base which has a clear audit trail and are therefore ‘justified’. Furthermore, the Objectives are consistent with National Policy including ‘emerging’ National Guidance contained in the Localism Bill (i.e. the level of housing has been determined by a locally derived need).

Representation ID
1315
Person ID  Mr Ankers
106660 South Downs Society
Agent ID Box 5
Sound ✔ Yes ☐ No ☐ Justified ☐ Effective ☐ Consistent with national policy
Legally Compliant ☐ Yes ☐ No

Details of Reasons for Soundess/ Legal Complaince:
We generally support all 15 of the Spatial objectives but SPO1 (countryside and rural areas) should make specific mention of the downs.

Details of Changes to be Made:

Representation ID
1526
Person ID  Mrs Rudin
105986 Forest Row Parish Council
Agent ID Box 5
Sound ✔ Yes ☐ No ☐ Justified ☐ Effective ☐ Consistent with national policy
Legally Compliant ☐ Yes ☐ No

Details of Reasons for Soundess/ Legal Complaince:
Support for the overarching objectives that contribute to the Vision. They are laudable and, we believe, achievable in broad terms across the district.

Details of Changes to be Made:
Summary of all Representations - Proposed Submission Core Strategy Regulation 27 - Report 11th July 2011

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**Representative ID**
1648

**Person ID**
516047

**Agent ID**
516026

**Representative Name**
Rydon Homes Ltd

**Agent Name**
Sigma Planning Services

**Box**
5

**Sound**
- Yes
- ☑️ No
- ☑️ Justified
- ☐ Effective
- ☐ Consistent with national policy

**Legally Compliant**
- ☐ Yes
- ☐ No

**Details of Reasons for Soundness/ Legal Compliance:**
There is no justification within the evidence base for directing more substantial investment to Uckfield and Hailsham than to Crowborough. The loss of employment from Pine Grove and lack of investment in recent years mean that Crowborough needs greater investment in order to avoid decline.

**Details of Changes to be Made:**
Direct greater investment to Crowborough

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**Representative ID**
1638

**Person ID**
107745

**Agent ID**
102625

**Representative Name**
Pelham Homes

**Agent Name**
Jennifer Owen & Associates Ltd.

**Box**
5

**Sound**
- ☐ Yes
- ☑️ No
- ☑️ Justified
- ☐ Effective
- ☐ Consistent with national policy

**Legally Compliant**
- ☐ Yes
- ☐ No

**Details of Reasons for Soundness/ Legal Compliance:**
"Supplementary documents have been submitted but not attached, and may be viewed at the Council offices on request". SP04. Revise to include Polegate as a town to receive more substantial investment in recognition of its ability to provide the most sustainable urban extensions as a result of the facilities and services already in the town, the ability to provide further facilities and services through the redevelopment of the town centre, the best public transport links of any of the Wealden Towns, land within walking distance of the town centre and the main line railway station together with its proximity to Eastbourne and the higher tier of facilities and services available there.

**Details of Changes to be Made:**
REVISION SOUGHT Second sentence to include Polegate with Hailsham and Uckfield.

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**Representative ID**
264

**Person ID**
134707

**Agent ID**

**Representative Name**
Mr Hurwood

**Agent Name**
CPRE Sussex, Wealden South Group

**Box**
6

**Sound**
- ☐ Yes
- ☐ No
- ☐ Justified
- ☐ Effective
- ☐ Consistent with national policy

**Legally Compliant**
- ☑️ Yes
- ☐ No

**Details of Reasons for Soundness/ Legal Compliance:**
Details of Changes to be Made:
SPO5 should include support for higher education provision where appropriate.
Representation ID
682
Person ID  Mr Beams  Agent ID
519685 Willingdon and Jevington Parish Council

Sound ☐ Yes ☐ No ☐ Justified ☐ Effective ☐ Consistent with national policy
Legally Compliant ☐ Yes ☐ No

Details of Reasons for Soundness/ Legal Complaince:
WJPC is concerned at the numerous references to Polegate and Willingdon as one settlement, as highlighted in 3.3 Table 1, 3.11, SPO6, WCS2, WCS3, 5.13, 6.31(2), Figure 8 and Figure 12. In particular, Figure 2 showing settlement hierarchy, places Polegate and Willingdon as one settlement, yet details other settlements individually.

Details of Changes to be Made:

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Representation ID
830
Person ID  Mr & Flittner  Agent ID
106034

Sound ☐ Yes ☑ No ☑ Justified ☑ Effective ☑ Consistent with national policy
Legally Compliant ☐ Yes ☐ No

Details of Reasons for Soundness/ Legal Complaince:
The wording of this objective and its aims are not something that can be achieved by planning policy or control. WDC can provide sites and buildings via planning where people can learn or gain skills. However it cannot "meet the learning needs of local people" or "ensure that the local workforce has the necessary skills" by planning control, this is entirely a function of the teachers or trainers who utilise those facilities.

Details of Changes to be Made: The objective should be amended to apply only to providing sites, and buildings for learning and training.

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Representation ID
1316
Person ID  Mr Ankers  Agent ID
106660 South Downs Society

Sound ☑ Yes ☐ No ☐ Justified ☐ Effective ☐ Consistent with national policy
Legally Compliant ☐ Yes ☐ No

Details of Reasons for Soundness/ Legal Complaince:
We generally support all 15 of the Spatial objectives but SPO1 (countryside and rural areas) should make specific mention of the downs.

Details of Changes to be Made:
Vision and Spatial Planning Objectives - Support 2.1 We support the WDC’s Spatial Planning Objectives (SPO1 – SP15). We consider the Objectives promote sustainable growth and strike an appropriate balance to accommodate that growth given the environmental and infrastructure requirements of the District. The Objectives will support Wealden’s aspiration to retain its rural character and high quality environment whilst achieving sufficient growth to support its economy, regenerate market towns and tackle deprivation. 2.2 To meet the ‘justified’ test of soundness, “the most appropriate strategy when considered against reasonable alternatives” needs to be explored. PPS12 expands on this further: ‘the ability to demonstrate that the plan is the most appropriate when considered against reasonable alternatives delivers confidence in the strategy. It requires the local planning authority to seek out and evaluate reasonable alternatives promoted by themselves and others to ensure that they bring forward those alternatives which they consider the LPA should evaluate as part of the plan making process. There is no point in inventing alternatives if they are not realistic. Being able to demonstrate that the plan is the most appropriate having gone through an objective process of assessing alternatives will pay dividends in terms of easier passage for the plan through the examination process. It will assist in evaluating the claims of those who wish to oppose the strategy.’ (PPS12, para 4.38 – PPS12’s own emphasis shown in italics) 2.3 In order to provide for a suitable strategy that strikes the right balance, WDC has prepared an extensive Evidence Base which identifies and assesses the various options available to WDC. These options are reviewed within the Background Papers (BP), in particular, BP1: Development of the Proposed Submission Core Strategy (section 5) and BP10: Sustainability Appraisal of Proposed Submission Core Strategy (Table 1.2). The Background Papers demonstrate the ‘appropriateness’ of the current proposed strategy, that ‘reasonable alternatives’ have been tested and that the Spatial Planning Objectives are found on ‘robust evidence’ i.e. the visions are ‘justified’ as required by PPS12. 2.4 The previous Spatial Development Options (June 2009) Consultation tested up to six different housing scenarios to accommodate the South East Plan (May 2009) housing target. In the light of the revocation of the RSS paragraphs 5.9 and 5.10 of BP1: Development of the Proposed Submission Core Strategy set out the steps which were addressed in determining the overall revised quantum of growth and the suitability of the proposed locations to accommodate this growth: ‘The Local Strategic Partnership focused upon meeting housing needs across the District, whilst Parish and Town Council’s within Wealden provided information on local growth issues and preferences’. This is further explored in paragraphs 5.11 – 5.37 and Section 7 of BP1: Development of the Proposed Submission Core Strategy including an assessment of the settlement hierarchy. 2.5 Section 8 of BP1: Development of the Proposed Submission Core Strategy is supported by section 8 of BP10: Sustainability Appraisal of Proposed Submission Core Strategy which in turn supports the Spatial Planning Objectives within the Core Strategy. The Options tested are considered realistic and are not ‘artificial’ as set out in paragraph 38 of PINS ‘Learning From Experience’ (Sept 2009) document, which states, ‘in some instances it appears that options are identified for the sake of having options rather than because they are realistic….if the options are limited there is no point in trying to artificially create them’. 2.6 The Spatial Planning Objectives therefore provide a clear vision and are specific to the challenges of the District. They are supported by the Evidence Base which has a clear audit trail, has tested all the reasonable alternatives and is therefore ‘justified’. Furthermore, the Objectives are consistent with National Policy including ‘emerging’ National Guidance contained in the Localism Bill (i.e. the level of housing has been determined by a locally derived need).
dividends in terms of easier passage for the plan through the examination process. It will assist in evaluating the claims of those who wish to oppose the strategy.’ (PPS12, para 4.38 – PPS12’s own emphasis shown in italics)

2.3 In order to provide for a suitable strategy that strikes the right balance, WDC has prepared an extensive Evidence Base which identifies and assesses the various options available to WDC. These options are reviewed within the Background Papers (BP), in particular, BP1: Development of the Proposed Submission Core Strategy (section 5) and BP10: Sustainability Appraisal of Proposed Submission Core Strategy (Table 1.2). The Background Papers demonstrate the ‘appropriateness’ of the current proposed strategy, that ‘reasonable alternatives’ have been tested and that the Spatial Planning Objectives are found on ‘robust evidence’ i.e. the visions are ‘justified’ as required by PPS12. 2.4 The previous Spatial Development Options (June 2009) Consultation tested up to six different housing scenarios to accommodate the South East Plan (May 2009) housing target. In the light of the revocation of the RSS paragraphs 5.9 and 5.10 of BP1: Development of the Proposed Submission Core Strategy set out the steps which were addressed in determining the overall revised quantum of growth and the suitability of the proposed locations to accommodate this growth: ‘The Local Strategic Partnership focused upon meeting housing needs across the District, whilst Parish and Town Council’s within Wealden provided information on local growth issues and preferences’. This is further explored in paragraphs 5.11 – 5.37 and Section 7 of BP1: Development of the Proposed Submission Core Strategy including an assessment of the settlement hierarchy. 2.5 Section 8 of BP1: Development of the Proposed Submission Core Strategy is supported by section 8 of BP10: Sustainability Appraisal of Proposed Submission Core Strategy which in turn supports the Spatial Planning Objectives within the Core Strategy. The Options tested are considered realistic and are not ‘artificial’ as set out in paragraph 38 of PINS ‘Learning From Experience’ (Sept 2009) document, which states, ‘in some instances it appears that options are identified for the sake of having options rather than because they are realistic….if the options are limited there is no point in trying to artificially create them’. 2.6 The Spatial Planning Objectives therefore provide a clear vision and are specific to the challenges of the District. They are supported by the Evidence Base which has a clear audit trail, has tested all the reasonable alternatives and is therefore ‘justified’. Furthermore, the Objectives are consistent with National Policy including ‘emerging’ National Guidance contained in the Localism Bill (i.e. the level of housing has been determined by a locally derived need).
Vision and Spatial Planning Objectives - Support 2.1 We support the WDC’s Spatial Planning Objectives (SPO1-SPO15). We consider the Objectives promote sustainable growth and strike an appropriate balance to accommodate that growth given the environmental and infrastructure requirements of the District. The Objectives will support Wealden’s aspiration to retain its rural character and high quality environment whilst achieving sufficient growth to support its economy, regenerate market towns and tackle deprivation. 2.2 To meet the ‘justified’ test of soundness, “the most appropriate strategy when considered against reasonable alternatives” needs to be explored. PPS12 expands on this further: ‘the ability to demonstrate that the plan is the most appropriate when considered against reasonable alternatives delivers confidence in the strategy. It requires the local planning authority to seek out and evaluate reasonable alternatives promoted by themselves and others to ensure that they bring forward those alternatives which they consider the LPA should evaluate as part of the plan making process. There is no point in inventing alternatives if they are not realistic. Being able to demonstrate that the plan is the most appropriate having gone through an objective process of assessing alternatives will pay dividends in terms of easier passage for the plan through the examination process. It will assist in evaluating the claims of those who wish to oppose the strategy.’ (PPS12, para 4.38 – PPS12’s own emphasis shown in italics) 2.3 In order to provide for a suitable strategy that strikes the right balance, WDC has prepared an extensive Evidence Base which identifies and assesses the various options available to WDC. These options are reviewed within the Background Papers (BP), in particular, BP1: Development of the Proposed Submission Core Strategy (section 5) and BP10: Sustainability Appraisal of Proposed Submission Core Strategy (Table 1.2). The Background Papers demonstrate the ‘appropriateness’ of the current proposed strategy, that ‘reasonable alternatives’ have been tested and that the Spatial Planning Objectives are found on ‘robust evidence’ i.e. the visions are ‘justified’ as required by PPS12. 2.4 The previous Spatial Development Options (June 2009) Consultation tested up to six different housing scenarios to accommodate the South East Plan (May 2009) housing target. In the light of the revocation of the RSS paragraphs 5.9 and 5.10 of BP1: Development of the Proposed Submission Core Strategy set out the steps which were addressed in determining the overall revised quantum of growth and the suitability of the proposed locations to accommodate this growth: ‘The Local Strategic Partnership focused upon meeting housing needs across the District, whilst Parish and Town Council’s within Wealden provided information on local growth issues and preferences’. This is further explored in paragraphs 5.11 – 5.37 and Section 7 of BP1: Development of the Proposed Submission Core Strategy including an assessment of the settlement hierarchy. 2.5 Section 8 of BP1: Development of the Proposed Submission Core Strategy is supported by section 8 of BP10: Sustainability Appraisal of Proposed Submission Core Strategy which in turn supports the Spatial Planning Objectives within the Core Strategy. The Options tested are considered realistic and are not ‘artificial’ as set out in paragraph 38 of PINS ‘Learning From Experience’ (Sept 2009) document, which states, ‘in some instances it appears that options are identified for the sake of having options rather than because they are realistic….if the options are limited there is no point in trying to artificially create them’. 2.6 The Spatial Planning Objectives therefore provide a clear vision and are specific to the challenges of the District. They are supported by the Evidence Base which has a clear audit trail, has tested all the reasonable alternatives and is therefore ‘justified’. Furthermore, the Objectives are consistent with National Policy including ‘emerging’ National Guidance contained in the Localism Bill (i.e. the level of housing has been determined by a locally derived need).

Details of Changes to be Made:
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Representation ID
1527
Person ID Mrs Rudin
Agent ID Box 6
Details of Reasons for Soundess/ Legal Complaince:

Concern in the application of spatial planning objective to Forest Row

Details of Changes to be Made:

Sound ☐ Yes ☑ No ☐ Justified ☐ Effective ☐ Consistent with national policy
Legally Compliant ☐ Yes ☐ No

Representation ID
85
Person ID Ms Van-Gils
Agent ID Mr Court
Details of Reasons for Soundess/ Legal Complaince:

In order to improve economic prosperity and support growth of the Wealden economy, provision needs to be made to meet forecast requirements. There is a need for around 17,300 dwellings in the plan period, as stated in the objections to policy SPO3 above. The construction of these dwellings will not only stimulate the local economy, but will help ensure that the workforce is properly housed. Without an adequate supply of housing employers will not be attracted to, or continue to invest in Wealden. Employees, furthermore, will find it difficult to acquire housing. The policy should therefore be reworded so as to recognise and accept this.

Details of Changes to be Made:
Representation ID
831
Person ID  Mr & Flittner
106034
Agent ID
Box 7

Sound  ☑ No  ☑ Justified  ☑ Effective  ☑ Consistent with national policy
Legally Compliant  ☑ Yes  ☐ No

Details of Reasons for Soundess/ Legal Complaince:
Objections have been made to the appropriate policy as set out in detailed submissions.

Details of Changes to be Made:
Any changes made to the CS due to objections will need to be reflected in the wording of this spatial planning objective.

Representation ID
1138
Person ID  Mr Watkins
328932
Kitewood estates
Agent ID
Box 7

Sound  ☑ Yes  ☐ No  ☐ Justified  ☐ Effective  ☐ Consistent with national policy
Legally Compliant  ☑ Yes  ☐ No

Details of Reasons for Soundess/ Legal Complaince:
The economic policy is fully supported

Details of Changes to be Made:

Representation ID
1184
Person ID  Miss Heron
534582
Agent ID
Box 7

Sound  ☐ Yes  ☑ No  ☑ Justified  ☑ Effective  ☑ Consistent with national policy
Legally Compliant  ☐ Yes  ☐ No

Details of Reasons for Soundess/ Legal Complaince:
there is no justification for failing to include Heathfield in the objective of improving economic prosperity. There is no reason why Hethfield as one of the five main towns should not be included in the objective of creating new jobs and increasing economic prospects.

Details of Changes to be Made:
Include Heathfield in the strategic objective of improving economic performance and providing new jobs.
Details of Reasons for Soundness/ Legal Compliance:

1.1 We object to Spatial Planning Objective 6 because for it to be sound reference should be made to the importance of tourism in the District. Paragraphs 3.27 to 3.29 set out the importance of tourism in the District. They describe the importance of the natural environment in the District and the Council's strategy to increase visitor spending. 1.2 Published in May 2006 the Good Practice Guide on Planning for Tourism stresses in chapter 2 that "tourism is of crucial importance to this country". It states that tourism revenue can aid the diversification of the rural economy. The guide goes on to state in paragraph 2.7 that the planning system must facilitate and promote the implementation of good quality development, to ensure that the industry can thrive and develop. 1.3 The Guide requires in paragraph 3.18 that local planning authorities should develop tourism policies to maximise the benefits of tourism. In paragraph 3.19 the guide states that while it is a principle of the planning system to seek to promote more sustainable transport choices, improve accessibility and reduce the need to travel this may be particularly difficult for some types of tourism projects or for areas that are poorly served by public transport. In paragraph 3.24 the Guide recognises that tourism can be a key element in rural and farm diversification. The Guide goes on to state that in rural areas wherever possible tourist and visitor facilities should be housed in existing or replacement buildings.

Details of Changes to be Made:

We therefore consider that to be sound the importance of tourism to the District should be recognised in the Spatial objectives which set the aims for the policies in the Core Strategy and later DPDs. A further sentence should be added stating that "tourist development can bring economic benefits and will be encouraged through planning policies."
Vision and Spatial Planning Objectives - Support 2.1 We support the WDC’s Spatial Planning Objectives (SPO1 – SP15). We consider the Objectives promote sustainable growth and strike an appropriate balance to accommodate that growth given the environmental and infrastructure requirements of the District. The Objectives will support Wealden’s aspiration to retain its rural character and high quality environment whilst achieving sufficient growth to support its economy, regenerate market towns and tackle deprivation. 2.2 To meet the ‘justified’ test of soundness, “the most appropriate strategy when considered against reasonable alternatives” needs to be explored. PPS12 expands on this further: ‘the ability to demonstrate that the plan is the most appropriate when considered against reasonable alternatives delivers confidence in the strategy. It requires the local planning authority to seek out and evaluate reasonable alternatives promoted by themselves and others to ensure that they bring forward those alternatives which they consider the LPA should evaluate as part of the plan making process. There is no point in inventing alternatives if they are not realistic. Being able to demonstrate that the plan is the most appropriate having gone through an objective process of assessing alternatives will pay dividends in terms of easier passage for the plan through the examination process. It will assist in evaluating the claims of those who wish to oppose the strategy.’ (PPS12, para 4.38 – PPS12’s own emphasis shown in italics)

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Summary of all Representations - Proposed Submission Core Strategy Regulation 27 - Report 11th July 2011

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Representation ID
1317
Person ID Mr Ankers
106660 South Downs Society

Sound ☑ Yes ☐ No ☐ Justified ☐ Effective ☐ Consistent with national policy
Legally Compliant ☐ Yes ☐ No

Details of Reasons for Soundess/ Legal Complaince:
We generally support all 15 of the Spatial objectives but SPO1 (countryside and rural areas) should make specific mention of the downs.

Details of Changes to be Made:

Representation ID
1528
Person ID Mrs Rudin
105986 Forest Row Parish Council

Sound ☑ Yes ☐ No ☐ Justified ☐ Effective ☐ Consistent with national policy
Legally Compliant ☐ Yes ☐ No

Details of Reasons for Soundess/ Legal Complaince:
Support for the overarching objectives that contribute to the Vision. They are laudable and, we believe, achievable in broad terms across the district.

Details of Changes to be Made:
Details of Reasons for Soundness/ Legal Complaince:

Policy WCS3 makes no provision for additional employment provision in the rural area (which includes Westham) even though the ELR2008 indicated that our client's site (Mountney Bridge Industrial Estate) could accommodate growth/development. Policy WCS3 does not therefore correspond with paragraphs 3.19 or 3.22 which support intensification of employment areas. Policy SPO6 is unclear and unsound, it is implied that any new jobs created will only make a positive contribution to the towns of Uckfield, Hailsham, Polegate and Willingdon.

Details of Changes to be Made:

Policy SP06 should be amended to make it clear that new economic development will be encouraged across all settlements in the district, particularly those in South Wealden, such as Westham. We also consider that the Mountney Bridge Industrial Estate should be identified for intensification and expansion. WCS3 should refer to the other locations which can accommodate intensification and expansion and there should be recognition that some lower order settlements such as Westham can contribute to economic growth.

Details of Reasons for Soundness/ Legal Complaince:

Hallam Land Management Limited (HLM) support the commitment to improve economic prosperity, although HLM believe there should be a stronger link between SP03 and SP06 and that the focus should more specifically be concentrated on the Eastbourne - Hailsham Triangle.

Details of Changes to be Made:

That the focus of SP06 be more specifically concentrated on the Eastbourne - Hailsham Triangle.

Details of Reasons for Soundness/ Legal Complaince:

There is no justification for failing to include Crowborough in the objective of improving economic prosperity. The Plan needs to compensate for the loss of jobs from the relocation of the Council Offices and to address out-commuting to Tunbridge Wells and elsewhere. There is no reason why Crowborough, as one of the main towns should not be included in the objective of creating new jobs and increasing economic prospects.

Details of Changes to be Made:

Include Crowborough in the strategic objective of improving economic performance and providing new jobs.
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Representation ID
1591
Person ID  Ognjanovic Agent ID
522137 Polegate Town Council

Details of Reasons for Soundness/ Legal Compliance:
Concern raised at the reference to Polegate and Willingdon as one settlement

Details of Changes to be Made:

Representation ID
1761
Person ID  Mr Keeley Agent ID
104437

Details of Reasons for Soundness/ Legal Compliance:
Employment This is a primary problem whereby people will need an income to pay the mortgages and rents affordable. Start up work units is something that is lacking in the area; I invite you to look at my campaign for change documents especially under new homes and land use. Affordable units could be created on rented land as on the document, we should also be creating business units in villages to spread employment over this area. Work from home should be considered when building new houses.

Details of Changes to be Made:
Conclusion Whilst the strategy plan will appear to have a lot of effort put into it, as it stands it would be a disaster if implemented and I would like to see the secretary of state to call in a public inquiry

Representation ID
42
Person ID  Mr Courtley Agent ID  Mr Courtley
513493 102476

Details of Reasons for Soundness/ Legal Compliance:
Reference should be made to other forms of sustainable travel ie cycle and walking. Connectivity to settlements through these means should be stated in the CS.

Details of Changes to be Made:
Include Cycle and walking in accordance with points raised above.
Details of Reasons for Soundess/ Legal Complaince:
Reference should be made to other forms of sustainable travel ie cycle and walking. Connectivity to settlements through these means should be stated in the CS. This is particularly relevant to the north Hailsham area surrounding the Hospital site and its connectivity to the rest of Hailsham. This would be significantly improved if Park Farm was included in the strategy master planning of the area.

Details of Changes to be Made:
Amend the Box% policy and consider broadening the strategy area of the north Hailsham area to include the Park Farm area north of New Rd? south of Hellingly Hospital

Details of Reasons for Soundess/ Legal Complaince:
Natural England commends the Council on its recognition of the importance of the environment and green infrastructure and the need to provide resilience for climate change. We particularly support spatial planning objectives SP01, SP07 SP09 and SP011

Details of Changes to be Made:
The policy should support mixed use developments as part of the objective of improving sustainable modes of transport

Details of Changes to be Made:
Policy SPO7 Add Development which includes a mix of housing and employment will be supported
Details of Reasons for Soundness/ Legal Compliance:
Since the council are not adhering to this objective in their detailed policies it should be amended or removed. This particularly applies to the first part where they claim they want to reduce the need to travel by car, yet as set out in details in objections to the relevant policies or paragraphs the council has mostly done the opposite. The greatest of these being the housing provision for the Hailsham area. This is a third of the whole districts provision, yet there is no rail service here, where as there is elsewhere. This will only lead to greater car use not less. Equally 2 of the 3 proposed main employment areas at the Ashdown Business Park and the Hackhurst Lane Estate are both some miles from the towns where most workers will come from, mostly by car

Details of Changes to be Made:
This objective so poorly adhered to in the detailed policies that it should be deleted.

Details of Reasons for Soundness/ Legal Compliance:
We generally support all 15 of the Spatial objectives but SPO1 (countryside and rural areas) should make specific mention of the downs.

Details of Changes to be Made:
Vision and Spatial Planning Objectives - Support 2.1 We support the WDC’s Spatial Planning Objectives (SPO1 – SP15). We consider the Objectives promote sustainable growth and strike an appropriate balance to accommodate that growth given the environmental and infrastructure requirements of the District. The Objectives will support Wealden’s aspiration to retain its rural character and high quality environment whilst achieving sufficient growth to support its economy, regenerate market towns and tackle deprivation. 2.2 To meet the ‘justified’ test of soundness, “the most appropriate strategy when considered against reasonable alternatives” needs to be explored. PPS12 expands on this further: ‘the ability to demonstrate that the plan is the most appropriate when considered against reasonable alternatives delivers confidence in the strategy. It requires the local planning authority to seek out and evaluate reasonable alternatives promoted by themselves and others to ensure that they bring forward those alternatives which they consider the LPA should evaluate as part of the plan making process. There is no point in inventing alternatives if they are not realistic. Being able to demonstrate that the plan is the most appropriate having gone through an objective process of assessing alternatives will pay dividends in terms of easier passage for the plan through the examination process. It will assist in evaluating the claims of those who wish to oppose the strategy.’ (PPS12, para 4.38 – PPS12’s own emphasis shown in italics) 2.3 In order to provide for a suitable strategy that strikes the right balance, WDC has prepared an extensive Evidence Base which identifies and assesses the various options available to WDC. These options are reviewed within the Background Papers (BP), in particular, BP1: Development of the Proposed Submission Core Strategy (section 5) and BP10: Sustainability Appraisal of Proposed Submission Core Strategy (Table 1.2). The Background Papers demonstrate the ‘appropriateness’ of the current proposed strategy, that ‘reasonable alternatives’ have been tested and that the Spatial Planning Objectives are found on ‘robust evidence’ i.e. the visions are ‘justified’ as required by PPS12. 2.4 The previous Spatial Development Options (June 2009) Consultation tested up to six different housing scenarios to accommodate the South East Plan (May 2009) housing target. In the light of the revocation of the RSS paragraphs 5.9 and 5.10 of BP1: Development of the Proposed Submission Core Strategy set out the steps which were addressed in determining the overall revised quantum of growth and the suitability of the proposed locations to accommodate this growth: ‘The Local Strategic Partnership focused upon meeting housing needs across the District, whilst Parish and Town Council’s within Wealden provided information on local growth issues and preferences’. This is further explored in paragraphs 5.11 – 5.37 and Section 7 of BP1: Development of the Proposed Submission Core Strategy including an assessment of the settlement hierarchy. 2.5 Section 8 of BP1: Development of the Proposed Submission Core Strategy is supported by section 8 of BP10: Sustainability Appraisal of Proposed Submission Core Strategy which in turn supports the Spatial Planning Objectives within the Core Strategy. The Options tested are considered realistic and are not ‘artificial’ as set out in paragraph 38 of PINS ‘Learning From Experience’ (Sept 2009) document, which states, ‘in some instances it appears that options are identified for the sake of having options rather than because they are realistic….if the options are limited there is no point in trying to artificially create them’. 2.6 The Spatial Planning Objectives therefore provide a clear vision and are specific to the challenges of the District. They are supported by the Evidence Base which has a clear audit trail, has tested all the reasonable alternatives and is therefore ‘justified’. Furthermore, the Objectives are consistent with National Policy including ‘emerging’ National Guidance contained in the Localism Bill (i.e. the level of housing has been determined by a locally derived need).

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dividends in terms of easier passage for the plan through the examination process. It will assist in evaluating the claims of those who wish to oppose the strategy.’ (PPS12, para 4.38 – PPS12’s own emphasis shown in italics)

2.3 In order to provide for a suitable strategy that strikes the right balance, WDC has prepared an extensive Evidence Base which identifies and assesses the various options available to WDC. These options are reviewed within the Background Papers (BP), in particular, BP1: Development of the Proposed Submission Core Strategy (section 5) and BP10: Sustainability Appraisal of Proposed Submission Core Strategy (Table 1.2). The Background Papers demonstrate the ‘appropriateness’ of the current proposed strategy, that ‘reasonable alternatives’ have been tested and that the Spatial Planning Objectives are found on ‘robust evidence’ i.e. the visions are ‘justified’ as required by PPS12.

2.4 The previous Spatial Development Options (June 2009) Consultation tested up to six different housing scenarios to accommodate the South East Plan (May 2009) housing target. In the light of the revocation of the RSS paragraphs 5.9 and 5.10 of BP1: Development of the Proposed Submission Core Strategy set out the steps which were addressed in determining the overall revised quantum of growth and the suitability of the proposed locations to accommodate this growth: ‘The Local Strategic Partnership focused upon meeting housing needs across the District, whilst Parish and Town Council’s within Wealden provided information on local growth issues and preferences’. This is further explored in paragraphs 5.11 – 5.37 and Section 7 of BP1: Development of the Proposed Submission Core Strategy including an assessment of the settlement hierarchy. 2.5 Section 8 of BP1: Development of the Proposed Submission Core Strategy is supported by section 8 of BP10: Sustainability Appraisal of Proposed Submission Core Strategy which in turn supports the Spatial Planning Objectives within the Core Strategy. The Options tested are considered realistic and are not ‘artificial’ as set out in paragraph 38 of PINS ‘Learning From Experience’ (Sept 2009) document, which states, ‘in some instances it appears that options are identified for the sake of having options rather than because they are realistic….if the options are limited there is no point in trying to artificially create them’. 2.6 The Spatial Planning Objectives therefore provide a clear vision and are specific to the challenges of the District. They are supported by the Evidence Base which has a clear audit trail, has tested all the reasonable alternatives and is therefore ‘justified’. Furthermore, the Objectives are consistent with National Policy including ‘emerging’ National Guidance contained in the Localism Bill (i.e. the level of housing has been determined by a locally derived need).

Representation ID
1529

Person ID  Mrs Rudin
105986 Forest Row Parish Council

Agent ID
Box 8

Sound  Yes  No  Justified  Effective  Consistent with national policy
Legally Compliant  Yes  No

Details of Reasons for Soundess/ Legal Complaince:
Support for the overarching objectives that contribute to the Vision. They are laudable and, we believe, achievable in broad terms across the district.

Details of Changes to be Made:

Representation ID
477

Person ID  The Firle Estate
522077 Smiths Gore

Agent ID  Mr Scott
261712

Box 8

Sound  No  Justified  Effective  Consistent with national policy
Legally Compliant  Yes  No

Details of Reasons for Soundess/ Legal Complaince:
The statement of Strategic Policy concerning the wish to ‘encourage a reduction in the need to travel by car’ is not supported by sufficient evidence or indeed exhibited through the locaitonal policy established by the Core Strategy - which provides too little opportunity for sustainable - particularly rail based - modes of transport.

Details of Changes to be Made:
The wording of this policy should be changed to reflect the differential in uptake and user preference between rail based and other forms of public transport provision.
Details of Reasons for Soundess/ Legal Complaince:

‘Suitable parking provision’ to support retailing and other business is ambiguous. There is clear concern of traffic impact on Ashdown Forest (3.32), parking issues at Polegate station (6.25) and limited supply of brownfield development opportunity (5.8). Policies rightly aspire to cut traffic, combat climate change, avoid flood risk areas, improve safety and maximise use of previously developed land. Parking is a key element in making these effective.

Details of Changes to be Made:

‘Suitable parking provision’ should clearly avoid being ‘excessive’, in pursuit of these policies. A significant quantity of current parking space should be available for brownfield redevelopment. Car free developments should be encouraged and supported.

Details of Reasons for Soundess/ Legal Complaince:

Policies to restrain traffic, obtain modal shift in travel, reducing need to travel and improve the experience of non-car travel need to be sharpened and focused. Aspirations for these to happen must have necessary circumstances incorporated into the policies.

Details of Changes to be Made:

Demand management techniques for traffic in Hailsham (6.15) should be included in all the related and equivalent policies. There should be a definite commitment to traffic reduction measures and targets throughout the Strategy Plan document.

Details of Reasons for Soundess/ Legal Complaince:

SP07 Herstmonceux Parish Council expresses concern that the current public transport service to Herstmonceux is inadequate for residents as it only provides a limited hourly service. There are no buses in the evenings or on Sundays, and so it is not possible to reduce the need to travel by car. Page 41 6.19 (8) and (9)

Details of Changes to be Made:
Details of Reasons for Soundness/ Legal Compliance:
As Wealden is a predominantly rural district we support the enhancement and encouragement of growth for villages, as outlined in Policy SPO8 and in accordance with para 3 of PPS7: Sustainable Development in Rural Areas which states that "Planning authorities should focus most new development in or near to local service centres where employment, housing (including affordable housing), services and other facilities can be provided close together". In particular we support the enhancement and encouragement of growth in Horam which is able to accommodate the largest proportion of additional growth as per Strategic Policy WCS6 - Rural Area Strategy. In fact the redevelopment of the Former Merrydown Cider site within the Local Service Centre of Horam as a mixed use scheme will assist the Authority in meeting the objectives in national planning policy and can deliver at least 70% of Horam's housing requirement (100 units), on Brownfield land.

Details of Changes to be Made:

Details of Reasons for Soundness/ Legal Compliance:
The aim of this policy is supported. However, given the restrictive approach to the provision of housing throughout the plan period, this policy is bound to fail. Villages will slowly decline if they are not allowed to grow in order to meet the housing and economic needs of the District.

Details of Changes to be Made:
Vision and Spatial Planning Objectives - Support 2.1 We support the WDC’s Spatial Planning Objectives (SPO1 – SP15). We consider the Objectives promote sustainable growth and strike an appropriate balance to accommodate that growth given the environmental and infrastructure requirements of the District. The Objectives will support Wealden’s aspiration to retain its rural character and high quality environment whilst achieving sufficient growth to support its economy, regenerate market towns and tackle deprivation. 2.2 To meet the ‘justified’ test of soundness, “the most appropriate strategy when considered against reasonable alternatives” needs to be explored. PPS12 expands on this further: ‘the ability to demonstrate that the plan is the most appropriate when considered against reasonable alternatives delivers confidence in the strategy. It requires the local planning authority to seek out and evaluate reasonable alternatives promoted by themselves and others to ensure that they bring forward those alternatives which they consider the LPA should evaluate as part of the plan making process. There is no point in inventing alternatives if they are not realistic. Being able to demonstrate that the plan is the most appropriate having gone through an objective process of assessing alternatives will pay dividends in terms of easier passage for the plan through the examination process. It will assist in evaluating the claims of those who wish to oppose the strategy.’ (PPS12, para 4.38 – PPS12’s own emphasis shown in italics) 2.3 In order to provide for a suitable strategy that strikes the right balance, WDC has prepared an extensive Evidence Base which identifies and assesses the various options available to WDC. These options are reviewed within the Background Papers (BP), in particular, BP1: Development of the Proposed Submission Core Strategy (section 5) and BP10: Sustainability Appraisal of Proposed Submission Core Strategy (Table 1.2). The Background Papers demonstrate the ‘appropriateness’ of the current proposed strategy, that ‘reasonable alternatives’ have been tested and that the Spatial Planning Objectives are found on ‘robust evidence’ i.e. the visions are ‘justified’ as required by PPS12. 2.4 The previous Spatial Development Options (June 2009) Consultation tested up to six different housing scenarios to accommodate the South East Plan (May 2009) housing target. In the light of the revocation of the RSS paragraphs 5.9 and 5.10 of BP1: Development of the Proposed Submission Core Strategy set out the steps which were addressed in determining the overall revised quantum of growth and the suitability of the proposed locations to accommodate this growth: ‘The Local Strategic Partnership focused upon meeting housing needs across the District, whilst Parish and Town Council’s within Wealden provided information on local growth issues and preferences’. This is further explored in paragraphs 5.11 – 5.37 and Section 7 of BP1: Development of the Proposed Submission Core Strategy including an assessment of the settlement hierarchy. 2.5 Section 8 of BP1: Development of the Proposed Submission Core Strategy is supported by section 8 of BP10: Sustainability Appraisal of Proposed Submission Core Strategy which in turn supports the Spatial Planning Objectives within the Core Strategy. The Options tested are considered realistic and are not ‘artificial’ as set out in paragraph 38 of PINS ‘Learning From Experience’ (Sept 2009) document, which states, ‘in some instances it appears that options are identified for the sake of having options rather than because they are realistic….if the options are limited there is no point in trying to artificially create them’. 2.6 The Spatial Planning Objectives therefore provide a clear vision and are specific to the challenges of the District. They are supported by the Evidence Base which has a clear audit trail, has tested all the reasonable alternatives and is therefore ‘justified’. Furthermore, the Objectives are consistent with National Policy including ‘emerging’ National Guidance contained in the Localism Bill (i.e. the level of housing has been determined by a locally derived need).

Details of Changes to be Made:
Vision and Spatial Planning Objectives - Support 2.1 We support the WDC’s Spatial Planning Objectives (SPO1 – SP15). We consider the Objectives promote sustainable growth and strike an appropriate balance to accommodate that growth given the environmental and infrastructure requirements of the District. The Objectives will support Wealden’s aspiration to retain its rural character and high quality environment whilst achieving sufficient growth to support its economy, regenerate market towns and tackle deprivation. 2.2 To meet the ‘justified’ test of soundness, “the most appropriate strategy when considered against reasonable alternatives” needs to be explored. PPS12 expands on this further: ‘the ability to demonstrate that the plan is the most appropriate when considered against reasonable alternatives delivers confidence in the strategy. It requires the local planning authority to seek out and evaluate reasonable alternatives promoted by themselves and others to ensure that they bring forward those alternatives which they consider the LPA should evaluate as part of the plan making process. There is no point in inventing alternatives if they are not realistic. Being able to demonstrate that the plan is the most appropriate having gone through an objective process of assessing alternatives will pay
dividends in terms of easier passage for the plan through the examination process. It will assist in evaluating the claims of those who wish to oppose the strategy.’ (PPS12, para 4.38 – PPS12’s own emphasis shown in italics)

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**Representation ID**

1319

**Person ID** Mr Ankers

**Agent ID** South Downs Society

Box 9

**Sound** Yes  No  Justified  Effective  Consistent with national policy

**Legally Compliant** Yes  No

**Details of Reasons for Soundess/ Legal Compliance:**

We generally support all 15 of the Spatial objectives but SPO1 (countryside and rural areas) should make specific mention of the downs.

**Details of Changes to be Made:**

**Representation ID**

1530

**Person ID** Mrs Rudin

**Agent ID** Forest Row Parish Council

Box 9

**Sound** Yes  No  Justified  Effective  Consistent with national policy

**Legally Compliant** Yes  No

**Details of Reasons for Soundess/ Legal Compliance:**

Support for the overarching objectives that contribute to the Vision. They are laudable and, we believe, achievable in broad terms across the district.

**Details of Changes to be Made:**
Hallam Land Management Limited (HLM) support the principle of SP08 but object to the scale of some of the allocations proposed. Development in rural villages should only be permitted where it is sustainable and of a scale commensurate with the size of that settlement.

Details of Changes to be Made:
Insert “smallscale” between additional and growth.
INTRODUCTION 1. The comments in this document are made on behalf of Mr Robin Nathan and focus on a number of issues raised by the 2011 Core Strategy Proposed Submission Document. Initially the representations address how the housing figures have been derived, the distribution of housing in the District and the uneven balance of strategic development, which is primarily focused in the south of the District. 2. In light of those comments we then consider amendments and additions to the document that should be made to ensure that it makes proper provision for the future planning of the District. In these representations the overall point that we wish to make on behalf of our client is that there should be amendments to the Strategy to focus more development in the north of the District. Suggestions are made as to how and where such development could be accommodated. 3. The purpose of these representations is to support the continued sustainable development of smaller settlements within the District such as Five Ash Down, which have a good range of community facilities. The proposed removal of development boundaries of a number of villages excludes them from potential housing development, which would have a detrimental impact on the vitality of these settlements and their local facilities and shops. Some settlements are located in close proximity to larger district and service centres and further small scale development in settlements such as Five Ash Down would help to achieve the council’s objectives of sustainable development and the use of local services. This approach would also accord with paragraph 3 of PPS3, which states: - “The delivery of housing in rural areas should respect the key principles underpinning the PPS, providing high quality housing that contributes to the creation and maintenance of sustainable rural communities in market towns and villages.” 4. We deal first with the context of the Core Strategy and the level of housing development it proposes, in light of a significant failure to justify or explain the levels of development proposed. REGIONAL STRATEGIES 5. PPS 12 provides the guidance for the formation of Core Strategies and the legal requirements in order for an Inspector to declare the plan ‘sound’. Paragraph 4.50 sets out the checks an Inspector must make on the plan in order to fully comply with legislation. These include having regard to national policy and generally conforming to the Regional Spatial Strategy. Paragraph 4.33 in PPS 12 further illustrates this point and seeks to ensure Core Strategies are ‘consistent with national policy and in general conformity with the regional spatial strategy’. 6. The South East Plan allocated 11,000 dwellings to the Wealden District over the 20 year plan period 2006-2026, at a rate of 550 dwellings per annum, whereas the Proposed Submission Core Strategy allocates just 9600 over the 24 year period 2006-2030, an annual rate of 400 dwellings. The differences between the annual rate of dwellings and the plan periods are important to consider here, and this can be done in two ways: - a. The South East Plan period is 2006 and 2026. The Core Strategy plan period is 2006 – 2030; four years longer. The South East Pan requires 11,000 dwellings to be built during that period at a rate of 550 dwellings per annum. The Core Strategy would require just 8000 dwellings to be built between 2006 - 2026 at a rate of 400 dwellings per annum as proposed. This is a deficit of 3000 dwellings between the Core Strategy and the regional requirement. b. Conversely, if the South East Plan annual rate of 550 was applied to the Core Strategy plan period of 2006 – 2030 (24 years), this would amount to a need for 13,200 dwellings over the period 2006 - 2030. The Core Strategy requires only 9600 dwellings over this period, resulting in a deficit of 3600 dwellings. 7. The calculations show a clear deficit in housing provision in the Core Strategy when both annual rates and plan periods are accurately compared. 8. There has been significant debate surrounding the revocation of Regional Strategies. The latest High Court Order has confirmed that the intended abolition of the Regional Strategies by the Coalition Government can now be considered ‘material’ in future planning decisions. However, as the Cala Homes (South) Ltd v Secretary of State for Communities and Local Government and Winchester City Council [2011] EWHC 97 Judgement states, there are distinctions to be made between materiality and weight (paragraph 29). Therefore although this is a material consideration, it is the responsibility of the decision maker to defend their decision if there is any deviation from the guidance contained within the Regional Strategies. ‘Thus, in appropriate circumstances, a local planning authority in the reasonable exercise of its discretion may give no significant weight or even no weight at all to a consideration material to its decision, provided that it has had regard to it’ [our emphasis] (paragraph 30). The point here is quite clear; if the council wishes to deviate from the South East Plan it may do so, but only if there is clear and reasoned explanation given in the Core Strategy document that adequately justifies the approach taken. A failure to properly consider this issue will result in the Core Strategy being deemed unsound. 9. It is also essential in this context to have regard to paragraph 34 of PPS 3, which states ‘Regional Spatial Strategies should set out the level of overall housing provision for the region, broadly illustrated in a housing delivery trajectory, for a sufficient period to enable Local Planning Authorities to plan for housing over a period of at least 15 years.’ 10. The failure of the council to properly consider the appropriate level
Summary of all Representations - Proposed Submission Core Strategy Regulation 27 - Report 11th July 2011

of housing provision and in addition to fail to properly explain and justify the reasons for the overall levels of growth that are promulgated is a significant deficiency in the Strategy and there is a need to consider substantial amendment to ensure the lack of soundness in this respect is overcome. POPULATION AND HOUSEHOLD PROJECTIONS 11. We have identified above the overarching issues in respect of the Strategy, relating to inadequacy of the council’s housing figure of 9600 over the plan period of 2006-2030 and the failure to adequately justify why that figure should be accepted. In order to properly assess the soundness of the proposed Strategy it is also necessary to discuss actual housing need in relation to demographics and statistical information. 12. As we have already made plain, if the Core Strategy does not accord with figures in the South East Plan, the justification for the level of housing provision it proposes should be explained elsewhere. We have therefore examined the document to seek to establish whether such an explanation exists. 13. The only reference to statistical evidence within the Core Strategy is contained on page 13 under paragraph 3.10 which states: ‘Trend based projections(1) show an increase in population in Wealden from 2006 to 2030 of around 19,000 persons, which equates to around 16,800 households.’ 14. This is accompanied by a footnote which offers a reference to Office of National Statistics (ONS) trend based projections in addition to different figures from East Sussex County Council. These contain a reference to a population increase of around 20,000 persons equating to 13,500 households and 13,000 additional dwellings. Both this comment and the direct reference in paragraph 3.10 indicate the need for a level of future housing that is considerably in excess of the council’s figure. 15. Background Paper 1 – Development of the Proposed Submission Core Strategy (BP1) also references ONS trend based population and housing projections on page 16, paragraph 5.11. This gives similar figures to those which are contained within the Core Strategy of a population increase of 19,200 persons equating to a need for an extra 16,800 households over the period 2006-2030. 16. We have also considered the ‘East Sussex in Figures’ website, which includes both trend based and policy based population and household projections for the different 25 year time periods. We have prepared the table below to highlight the comparison between the trend and policy based figures: - Trend Based Policy based Population projections Population projections 2008 2033 Increase 2001 2026 Increase 143,400 165,400 22,000 140,184 157,935 17,751 Household projections Household projections 2008 2033 Increase 2001 2026 Increase 61,290 77,684 16,394 58,466 71,356 12,890 The above figures have been sourced from www.eastsussexfigures.org.uk 17. The important issue here is that it is unclear from the Core Strategy documents exactly which figures have been used, and it remains unclear despite our direct enquiries of the council on the matter. It seems likely, however, that trend based population and household projections have been obtained from this dataset. It may be the case that the figures above have been updated and that the council’s figures take into account previous figures available from 2006. These may then have been adjusted to fit in to the plan period of 2006-2030. 18. The trend based 2008 population projections were published by the Office for National Statistics (ONS) in May 2010 and the trend based housing projections are based on these figures but contain new household type categories recently developed by the Department of Communities and Local Government. 19. The trend based figures shown above are similar to the figures referenced in the Core Strategy, taking into account the adjustment of dates. However the footnote on page 13 refers to 13,000 additional dwellings, which is below any trend based figures previously referenced. It appears therefore that this may relate to the policy based figures, which are similar to the policy based household projection shown above (12,890), although there is some variation as the footnote references 2006-2031 and the above figures relate to 2001-2026. 20. The policy based figures shown above are described on the East Sussex in Figures website as being derived from housing provision figures provided within the South East Plan, housing trajectory work provided by the relevant council’s in September 2009, and they are modelled on the Chelmer Model. This is mentioned on page 16 of BP1 in paragraph 5.12 where it is noted that: - ‘Due to the complexity of the model, the information used to predict future demand can not be examined in any great detail.’ 21. This is insufficient as the basis for the projections for future growth within the Core Strategy relies on these figures and it is the purpose of Background Papers to adequately explain these findings. This is especially the case as the council’s figures have been inadequately referenced and deviate considerably from all other relevant sources. 22. It is noted that although the footnote on page 13 of the Core Strategy is not properly referenced and there is no background information relating to how this information has been derived, the number of households (13,500) is more than the number of additional dwellings required (13,000). It is assumed that the extra 500 homes have been accommodated for through the council’s own information regarding long term empty dwellings in the District, short term empty dwellings due to an occupant’s death or houses currently being sold on the market. However it is considered that this slight drop in the number of households compared to the number of dwellings required is not greatly significant to argue for less housing need. Furthermore these figures have not been adequately referenced or justified and the calculations used to reach these figures are unavailable. HOUSING REQUIREMENT 23. It is predominantly trend based population and household projections which have been referenced within the Core Strategy where it is then explained on page 13, paragraph 3.10 that: ‘This shows the demand for both market and affordable housing is high, and in excess of that which could be accommodated or delivered within Wealden.’ 24. This appears to be the basis of the council’s approach to the Core Strategy as a matter of basic principle; that the level of housing proposed for the District is less than the figure of new dwellings required by reference to regional policy and less than that indicated to be required by all other relevant sources for the reason that the District has insufficient capacity to accommodate housing at the levels required. This is the sole extent to which the council attempts to justify the 9600 housing figure. 25. However, there is no adequate explanation anywhere in the Strategy as to why the projected increase in households cannot be accommodated in the District. Of even greater importance, the Strategy, having stated that
insufficient dwellings to meet identified need will be allowed for, fails in any way to consider or try to quantify the potentially significant social, economic and housing problems that an acknowledged failure to meet projected future requirements will cause. AFFORDABLE HOUSING 26. It is notable in respect of the council’s failure to deal with these issues that in Background Paper 1 – Development of the Proposed Submission Core Strategy (BP1) the council repeatedly concludes that high levels of housing are required within the District and acknowledges that this need is identified in a variety of demographic and statistical evidence. 27. The issue of affordable housing is raised within the Core Strategy in Background Papers 1 – Development of the Proposed Submission Core Strategy and 2 – Managing the Delivery of Housing. The council’s Housing Needs Assessment (January 2010) is referenced on page 17, paragraph 5.14 of BP1 which describes how the need for affordable housing cannot be accommodated within the District despite evidence showing a great need. This is again referenced within BP2 (page 3, paragraph 2.3) where the council’s Strategic Housing Market Assessment (SHMA) has also been referred to which addresses ‘very significant affordability issues’ within the District. BP2 (page 3, paragraph 2.3) also identifies Wealden as one of the highest house price areas in the country. 28. However, there is no correlation between the extent to which the failure to produce adequate levels of affordable housing that would result from the overall approach to Core Strategy housing provision would result in social deprivation and other long term problems for the population of the District. That is in our view be a fundamental deficiency of the Strategy. DEMOGRAPHICS 29. BP2 - Managing the Delivery of Housing (page 3, paragraph 2.4) - explains the demographic structure of population and households within the District. There are a number of trends which have been referred to, including a decrease in household size, resulting in more single person households, particularly the elderly. The demand for housing from demographic evidence, coupled with the economic prosperity considerations below, mean that the overall health of the District depends on a future growth in population. It is therefore the responsibility of the council to provide enough housing both of the correct type and in the correct location, in accordance with the nature of demand outlined above. ECONOMIC PROSPERITY 30. It is a requirement of PPS 4 Planning for Sustainable Economic Growth, that local authorities should include within their plans a clear economic vision for their areas which ‘positively and proactively encourages sustainable economic growth’ (page 7, EC2.1 (a)). 31. Due to the need to maintain an economically active and consumer based population in line with PPS 4, in-migration is encouraged by the council. BP2, page 3, paragraph 2.4 states: ‘In order to maintain the viability of services and facilities and the vitality of the local economy there is therefore a requirement for significant new housing development within the District which would encourage some in-migration in order to maintain population levels’. 32. In addition, ONS figures for 2007 indicate a net inward migration from within the UK to Wealden of 800 people (arising from 7,800 leaving the District and 8,600 entering), which demonstrates in-migration is occurring and adds to the demand for housing within the District. 33. It is noted within BP2, page 3, paragraph 2.4: - ‘This natural change, leading to a declining and more elderly population, could have a potentially very damaging effect on the future customer base on existing services and facilities within the District as well as for the viability and vitality of Wealden’s town centres by reducing the economically active sector.’ 34. This effectively acknowledges that on economic grounds an increase in the population that would be the result of a higher level of housing growth is required to enable the District to maintain and improve its economic base and to facilitate protection of existing employment levels and facilitate employment growth. 35. None of these considerations relating to housing and economic need are evident within the housing figures which the Core Strategy proposes overall. The low figure of 9600 is not adequately justified within any of these documents, despite evidence to show that higher levels of housing are needed and would be beneficial to the future growth of Wealden, particularly to maintain the vitality of town centres and support economic growth. CONSTRAINTS WITHIN WEALDEN 36. The Core Strategy and BP1 identify constraints within the District which is considered to restrict housing growth in certain areas. These are outlined on page 23 of BP1, paragraph 6.2 and include the issues of waste water treatment capacity in the south of the District and the need to protect the rural nature of the District and the High Weald AONB. Also included within constraints for Uckfield, Polegate and Hailsham in the Core Strategy are traffic management and congestion problems in the town centres with significant infrastructure improvements required. 37. However this must be contrasted against the above evidence where ONS figures show a demand for housing given the projected increase in population, the overwhelming need for affordable housing and the need for in-migration to tackle population needs of the Wealden District and support economic prosperity. This goes to the heart of the need for the Core Strategy, which should seek to plan positively for appropriate growth in balance with the acknowledgement of constraints, rather than reducing growth rates arbitrarily. 38. Although these constraints and needs have been referred to within the documents relating to the Core Strategy, there is no statistical analysis to ascertain how the 9600 housing figure has been decided. There is also no explanation as to why the figures have been decreased from the South East Plan allocation, which for the Core Strategy plan period would be 13,200, or as to why the proposed allocation fails to meet household projections to an even greater extent. It is our case that the need for housing has not been appropriately analysed and a figure of 9600 does not address the evidence, which clearly shows the requirement for housing. 39. This conclusion merely concurs with that which has been reached repeatedly through BP1, and in particular on page 21, paragraph 5.37, which supports the above points in relation to a significant need for housing growth. The discussion which follows on the constraints to development does not attempt to expand on the nature of these problems and by how much they would limit new housing development. Therefore without robust statistical analysis and an unclear analysis of ONS projections it not possible to ascertain how the housing figure of 9600 has been established. As it has been used as the overall basis of the Core Strategy, this is a fundamental fault in the
research and analysis of the evidence base of the document which results in a need to overhaul housing figures basing them on real evidence of need. FORWARD PLANNING 40. Based on the discussion and evidence referenced above, it is considered that 9600 is not an appropriately justified housing figure for the District. The figure fails to take into account the need for future growth in the District and does not propose effective forward planning which is the main purpose of Core Strategies. 41. The only justification for providing this figure seems to be based on past housing figures. This is contained within the Core Strategy on page 29, paragraph 5.13 which explains how over the last 21 years an average of 400 dwellings have been built per annum in the District and that based on this, a similar rate is achievable in the future. 42. This does not provide for effective forward planning as evidence is based on past results rather than remaining focused on future growth. It is evident from the projected population figures that population is expected to increase and if Wealden are unable to accommodate this growth, it will force people to reside outside of the District. This increases pressure on neighbouring authorities who suffer their own constraints and it is the responsibility of Wealden District Council to address this growth properly.

PROPOSED REVISED HOUSING FIGURES 43. The South East Plan allocated 11,000 dwellings to the District based on national housing figures and fair distribution across the region taking into account policy considerations of each District and national housing need. The DCLG policy based population and housing projections are run under the same assumptions of the trend based projections in terms of fertility, mortality and migration level, but additionally they take into account the number of houses planned to be built during the projection period. The migration level is then adjusted according to the future housing provision. This information has been obtained in response to a specific enquiry from East Sussex County Council, correspondence of which has been attached as Appendix 1. 44. On this basis it is considered that the policy based projections fairly assess population growth and the requirements of the District. It is therefore proposed that in order to accommodate the requirement for the population increase as calculated in the evidence addressed above, it is fundamental to work towards a figure of 13,000 as proposed both by the South East Plan and justified by policy based household projections. If this position is not concurred with then the 11,000 figure allocated within the South East Plan must be taken as an absolute minimum. 45. This will then adequately accommodate for projected population growth, in-migration and economic prosperity. It will also accommodate for changing demographics of smaller households and an increase in housing will greatly help to address the apparent affordability problems in the District. It will encourage a greater choice of types and tenures of housing and subject to national requirements, affordable housing can be promoted through larger housing development schemes.

DISTRIBUTION OF HOUSING 46. This section of the representations discusses the distribution of housing, primarily between the north and south of the District but also in terms of the manner of the council’s treatment of the settlement hierarchy. The first notable point is many of the significant potential infrastructure constraints, such as waste water treatment capacity and inadequate road infrastructure, are focused on the south of the District. This is where a large majority of the housing has been allocated. The Strategy acknowledges that further development here would be limited due to these constraints, but the overall approach to dealing with levels of development in the south in the South East Plan is acknowledged. It is accepted that the council’s approach to development in these areas is acceptable in principle, although there are one or two instances where we consider that the degree of emphasis on development in the south has resulted in proposed locations for housing that are inappropriate. 47. The discussion earlier in this document highlights the very significant and acknowledged need for a more substantial housing figure in the District. Given that the general approach to housing provision and location in the south is acceptable consideration therefore needs to be given in the Strategy to additional provision in the north of the District at an appropriate scale and in locations that reflect the need to consider the appropriateness of the settlement hierarchy. For this reason it is considered that smaller sites in villages with a reasonable level of services and facilities should also be given fair consideration. It is considered that some of the villages that are proposed to have their development boundaries removed will be unnecessarily excluded from suitable future growth. 48. Some rural villages benefit from a local consumer base but are also located in close proximity to larger towns. A good example is Five Ash Down which has good local facilities and is also located in close proximity to Uckfield and benefits from the facilities available there. In order to accommodate the extra growth which is required, villages in sustainable locations should not be excluded from potential future development. An example is land available at Coopers Green, a plan of which is attached as Appendix 2.

GENERAL SUMMARY 49. It follows from the general arguments set out above that we consider that the overall position of the proposed Core Strategy is such that it has not been demonstrated to any satisfactory degree that it represents a reasonable approach to meeting acknowledged housing demand. While the strategy appears satisfactory in dealing with the generalities of the amount of growth it provides for there is a significant failure to deliver sufficient housing to meet the actual likely future requirement, particularly in the north of the District. 50. The inclusion within the Core Strategy of housing figures that are below those of the South East Plan and below those in ONS projections is not justified or, importantly, explained in any meaningful way in the document, and in the absence of such adequate explanation it can only be concluded that the Strategy is unsound and will fail to provide an adequate future policy base. 51. The housing figures allocated within the Core Strategy are not sufficient to accommodate adequate growth in the District and would result in the plan failing the tests of soundness. The 9600 housing figure has not been derived from robust statistical analysis and instead relies upon past annual housing figures. The Core Strategy overall housing figures therefore fail to accommodate for future growth and effective forward planning. 52. It is considered that there is a need to allocate 13,000 dwellings over the plan period 2006-2030 to adequately address the issues relating to policy based population growth and housing requirements. Moreover, here are a number of suitable locations within the District available for housing
development which do not compromise the constraints highlighted within the Core Strategy. 53. The failure of the
Core Strategy to make provision in this way means that additional housing allocations are necessary in order to
meet likely future requirements. The balance of the Strategy is significantly weighted towards urban growth,
particularly in the south of the District, and although the overall approach to housing and economic development,
and the balance with necessary associated infrastructure provision is justified in the Strategy the failure of the
Strategy to provide appropriately for development in the north of the District, and importantly the decision to
exclude a number of smaller settlements from the development process, is wrong. 54. In order for the council to
focus on effective forward planning, it must appropriately consider the identified housing requirement and
sustainable distribution of housing development which should be based on statistical analysis and balanced policy
considerations. This will encourage economic prosperity in identified town centres, encourage a greater choice of
housing which will help to tackle affordability issues and ensure the continued vitality of the Districts towns and
villages without compromising the rural nature of the District. 55. Because of this there is a need not only to
support rural communities but also to appreciate the contribution they can make to sustainable development
throughout the District. Excluding villages such as Five Ash Down from the possibility of future development is
wholly inappropriate in this context.

Details of Changes to be Made:
Our representations make reference to the changes we consider neccessary to the Strategy
INTRODUCTION 1. The comments in this document are made on behalf of Knight Developments and focus on a number of issues raised by the 2011 Core Strategy Proposed Submission Document. Initially the representations address how the housing figures have been derived, the distribution of housing in the District and the uneven balance of strategic development, which is primarily focused in the south of the District. 2. In light of those comments we then consider amendments and additions to the document that should be made to ensure that it makes proper provision for the future planning of the District. In these representations the overall point that we wish to make on behalf of our client is that there should be amendments to the Strategy to focus more development in the north of the District and that, as the largest town, such development should be centred on Crowborough. Suggestions are made as to how and where such development could be accommodated. 3. We deal first with the context of the Core Strategy and the level of housing development it proposes, in light of a significant failure to justify or explain the levels of development proposed. REGIONAL STRATEGIES 4. PPS 12 provides the guidance for the formation of Core Strategies and the legal requirements in order for an Inspector to declare the plan ‘sound’. Paragraph 4.50 sets out the checks an Inspector must make on the plan in order to fully comply with legislation. These include having regard to national policy and generally conforming to the Regional Spatial Strategy. Paragraph 4.33 in PPS 12 further illustrates this point and seeks to ensure Core Strategies are ‘consistent with national policy and in general conformity with the regional spatial strategy’. 5. The South East Plan allocated 11,000 dwellings to the Wealden District over the 20 year plan period 2006-2026, at a rate of 550 dwellings per annum, whereas the Proposed Submission Core Strategy allocates just 9600 over the 24 year period 2006-2030, an annual rate of 400 dwellings. The differences between the annual rate of dwellings and the plan periods are important to consider here, and this can be done in two ways: i. The South East Plan period is 2006 - 2026. The Core Strategy plan period is 2006 – 2030; four years longer. The South East Pan requires 11,000 dwellings to be built during that period at a rate of 550 dwellings per annum. The Core Strategy would require just 8000 dwellings to be built between 2006 and 2026 at a rate of 400 dwellings per annum as proposed. This is a deficit of 3000 dwellings between the Core Strategy and the regional requirement. ii. Conversely, if the South East Plan annual rate of 550 was applied to the Core Strategy plan period of 2006 – 2030 (24 years), this would amount to a need for 13,200 dwellings over the period 2006 - 2030. The Core Strategy requires only 9600 dwellings over this period, resulting in a deficit of 3600 dwellings. 6. The calculations show a clear deficit in housing provision in the Core Strategy when both annual rates and plan periods are accurately compared. 7. There has been significant debate surrounding the revocation of Regional Strategies and the latest High Court Order has confirmed that the intended abolition of the Regional Strategies by the Coalition Government can now be considered ‘material’ in future planning decisions. However, as the Cala Homes (South) Ltd v Secretary of State for Communities and Local Government and Winchester City Council [2011] EWHC 97 Judgement states, there are distinctions to be made between materiality and weight (paragraph 29). Therefore although this is a material consideration, it is the responsibility of the decision maker to defend their decision if there is any deviation from the guidance contained within the Regional Strategies. ‘Thus, in appropriate circumstances, a local planning authority in the reasonable exercise of its discretion may give no significant weight or even no weight at all to a consideration material to its decision, provided that it has had regard to it’ [our emphasis] (paragraph 30). The point here is quite clear; if the council wishes to deviate from the South East Plan it may do so, but only if there is clear and reasoned explanation given in the Core Strategy document that adequately justifies the approach taken. A failure to properly consider this issue will result in the Core Strategy being deemed unsound. 8. It is also essential in this context to have regard to paragraph 34 of PPS 3, which states ‘Regional Spatial Strategies should set out the level of overall housing provision for the region, broadly illustrated in a housing delivery trajectory, for a sufficient period to enable Local Planning Authorities to plan for housing over a period of at least 15 years.’ 9. The failure of the council to properly consider the appropriate level of housing provision and in addition to fail to properly explain and justify the reasons for the overall levels of growth that are promulgated is a significant deficiency in the Strategy and there is a need to consider substantial amendments to ensure the lack of soundness in this respect is overcome. POPULATION AND HOUSEHOLD PROJECTIONS 10. We have identified above the overarching issues in respect of the Strategy, relating to inadequacy of the council’s housing figure of 9600 over the plan period of 2006-2030 and the failure to adequately justify why that figure should be accepted. In order to properly assess the soundness of the proposed Strategy it is also necessary to discuss actual housing need in relation to demographics and statistical information. 11. As we have already made plain, if the Core Strategy does not accord with figures in the South East Plan, the justification for the level of housing provision it proposes should
be explained elsewhere. We have therefore examined the document to seek to establish whether such an explanation exists. 12. The only reference to statistical evidence within the Core Strategy is contained on page 13 under paragraph 3.10 which states: ‘Trend based projections(1) show an increase in population in Wealden from 2006 to 2030 of around 19,000 persons, which equates to around 16,800 households.’ 13. This is accompanied by a footnote which offers a reference to Office of National Statistics (ONS) trend based projections in addition to different figures from East Sussex County Council. These contain a reference to a population increase of around 20,000 persons equating to 13,500 households and 13,000 additional dwellings. Both this comment and the direct reference in paragraph 3.10 indicate the need for a level of future housing that is considerably in excess of the council’s figure. 14. Background Paper 1 – Development of the Proposed Submission Core Strategy (BP1) also references ONS trend based population and housing projections on page 16, paragraph 5.11. This gives similar figures to those which are contained within the Core Strategy of a population increase of 19,200 persons equating to a need for an extra 16,800 households over the period 2006-2030. 15. We have also considered the ‘East Sussex in Figures’ website, which includes both trend based and policy based population and household projections for the different 25 year time periods. We have prepared the table below to highlight the comparison between the trend and policy based figures: - Trend Based Policy based Population projections Population projections 2008 2033 Increase 2001 2026 Increase 143,400 165,400 22,000 140,184 157,935 17,751 Household projections Household projections 2008 2033 Increase 2001 2026 Increase 61,290 77,684 16,394 58,466 71,356 12,890

The above figures have been sourced from www.eastsussexinfigures.org.uk 16. The important issue here is that it is unclear from the Core Strategy documents exactly which figures have been used, and it remains unclear despite our direct enquiries of the council on the matter. It seems likely, however, that trend based population and household projections have been obtained from this dataset. It may be the case that the figures above have been updated and that the council’s figures take into account previous figures available from 2006. These may then have been adjusted to fit in to the plan period of 2006-2030. 17. The trend based 2008 population projections were published by the Office for National Statistics (ONS) in May 2010 and the trend based housing projections are based on these figures but contain new household type categories recently developed by the Department of Communities and Local Government. 18. The trend based figures shown above are similar to the figures referenced in the Core Strategy, taking into account the adjustment of dates. However the footnote on page 13 refers to 13,000 additional dwellings, which is below any trend based figures previously referenced. It appears therefore that this may relate to the policy based figures, which are similar to the policy based household projection shown above (12,890), although there is some variation as the footnote references 2006-2031 and the above figures relate to 2001-2026. 19. The policy based figures shown above are described on the East Sussex in Figures website as being derived from housing provision figures provided within the South East Plan, housing trajectory work provided by the relevant council’s in September 2009, and they are modelled on the Chelmer Model. This is mentioned on page 16 of BP1 in paragraph 5.12 where it is noted that: ‘Due to the complexity of the model, the information used to predict future demand can not be examined in any great detail.’ 20. This is insufficient as the basis for the projections for future growth within the Core Strategy relies on these figures and it is the purpose of Background Papers to adequately explain these findings. This is especially the case as the council’s figures have been inadequately referenced and deviate considerably from all other relevant sources. 21. It is noted that although the footnote on page 13 of the Core Strategy is not properly referenced and there is no background information relating to how this information has been derived, the number of households (13,500) is more than the number of additional dwellings required (13,000). It is assumed that the extra 500 homes have been accommodated for through the council’s own information regarding long term empty dwellings in the District, short term empty dwellings due to an occupant’s death or houses currently being sold on the market. However it is considered that this slight drop in the number of households compared to the number of dwellings required is not greatly significant to argue for less housing need. Furthermore these figures have not been adequately referenced or justified and the calculations used to reach these figures are unavailable. HOUSING REQUIREMENT 22. It is predominantly trend based population and household projections which have been referenced within the Core Strategy where it is then explained on page 13, paragraph 3.10 that: ‘This shows the demand for both market and affordable housing is high, and in excess of that which could be accommodated or delivered within Wealden.’ 23. This appears to be the basis of the council’s approach to the Core Strategy as a matter of basic principle; that the level of housing proposed for the District is less than the figure of new dwellings required by reference to regional policy and less than that indicated to be required by all other relevant sources for the reason that the District has insufficient capacity to accommodate housing at the levels required. This is the sole extent to which the council attempts to justify the 9600 housing figure. 24. However, there is no adequate explanation anywhere in the Strategy as to why the projected increase in households cannot be accommodated in the District. Of even greater importance, the Strategy, having stated that insufficient dwellings to meet identified need will be allowed for, fails in any way to consider or try to quantify the potentially significant social, economic and housing problems that an acknowledged failure to meet projected future requirements will cause. AFFORDABLE HOUSING 25. It is notable in respect of the council’s failure to deal with these issues that in Background Paper 1 – Development of the Proposed Submission Core Strategy (BP1) 26. The issue of affordable housing is raised within the Core Strategy in Background Papers 1 – Development of the Proposed Submission Core Strategy and 2 – Managing the Delivery of Housing. The council’s Housing Needs Assessment (January 2010) is referenced on page 17, paragraph 5.14 of BP1 which describes.
how the need for affordable housing cannot be accommodated within the District despite evidence showing a great need. This is again referenced within BP2 (page 3, paragraph 2.3) where the council’s Strategic Housing Market Assessment (SHMA) has also been referred to which addresses ‘very significant affordability issues’ within the District. BP2 (page 3, paragraph 2.3) also identifies Wealden as one of the highest house price areas in the country. 27. However, there is no correlation between the extent to which the failure to produce adequate levels of affordable housing that would result from the overall approach to Core Strategy housing provision would result in social deprivation and other long term problems for the population of the District. That is in our view a fundamental deficiency of the Strategy. DEMOGRAPHICS 28. BP2 - Managing the Delivery of Housing (page 3, paragraph 2.4) - explains the demographic structure of population and households within the District. There are a number of trends which have been referred to, including a decrease in household size, resulting in more single person households, particularly the elderly. The demand for housing from demographic evidence, coupled with the economic prosperity considerations below, mean that the overall health of the District depends on a future growth in population. It is therefore the responsibility of the council to provide enough housing both of the correct type and in the correct location, in accordance with the nature of demand outlined above. ECONOMIC PROSPERITY 29. It is a requirement of PPS 4 (2009) Planning for Sustainable Economic Growth, that local authorities should include within their plans a clear economic vision for their areas which ‘positively and proactively encourages sustainable economic growth’ (page 7, EC2.1 (a)). 30. Due to the need to maintain an economically active and consumer based population in line with PPS 4, in-migration is encouraged by the council. BP2, page 3, paragraph 2.4 states: - ‘In order to maintain the viability of services and facilities and the vitality of the local economy there is therefore a requirement for significant new housing development within the District which would encourage some in-migration in order to maintain population levels’. 31. In addition, ONS figures for 2007 indicate a net inward migration from within the UK to Wealden of 800 people (arising from 7,800 leaving the District and 8,600 entering), which demonstrates in-migration is occurring and adds to the demand for housing within the District. 32. It is noted within BP2, page 3, paragraph 2.4: - ‘This natural change, leading to a declining and more elderly population, could have a potentially very damaging effect on the future customer base on existing services and facilities within the District as well as for the viability and vitality of Wealden’s town centres by reducing the economically active sector.’ 33. This effectively acknowledges that on economic grounds an increase in the population that would be the result of a higher level of housing growth is required to enable the District to maintain and improve its economic base and to facilitate protection of existing employment levels and facilitate employment growth. 34. None of these considerations relating to housing and economic need are evident within the housing figures which the Core Strategy proposes overall. The low figure of 9600 is not adequately justified within any of these documents, despite evidence to show that higher levels of housing are needed and would be beneficial to the future growth of Wealden, particularly to maintain the vitality of town centres and support economic growth. CONSTRAINTS WITHIN WEALDEN 35. The Core Strategy and BP1 identify constraints within the District which is considered to restrict housing growth in certain areas. These are outlined on page 23 of BP1, paragraph 6.2 and include the issues of waste water treatment capacity in the south of the District and the need to protect the rural nature of the District and the High Weald AONB. Also included within constraints for Uckfield, Polegate and Hailsham in the Core Strategy are traffic management and congestion problems in the town centres with significant infrastructure improvements required. 36. However this must be contrasted against the above evidence where ONS figures show a demand for housing given the projected increase in population, the overwhelming need for affordable housing and the need for in-migration to tackle population needs of the Wealden District and support economic prosperity. This goes to the heart of the need for the Core Strategy, which should seek to plan positively for appropriate growth in balance with the acknowledgement of constraints, rather than reducing growth rates arbitrarily. 37. Although these constraints and needs have been referred to within the documents relating to the Core Strategy, there is no statistical analysis to ascertain how the 9600 housing figure has been decided. There is also no explanation as to why the figures have been decreased from the South East Plan allocation, which for the Core Strategy plan period would be 13,200, or as to why the proposed allocation fails to meet household projections to an even greater extent. It is our case that the need for housing has not been appropriately analysed and a figure of 9600 does not address the evidence, which clearly shows the requirement for housing. 38. This conclusion merely concurs with that which has been reached repeatedly through BP1, and in particular on page 21, paragraph 5.37, which supports the above points in relation to a significant need for housing growth. The discussion which follows on the constraints to development does not attempt to expand on the nature of these problems and by how much they would limit new housing development. Therefore without robust statistical analysis and an unclear analysis of ONS projections it not possible to ascertain how the housing figure of 9600 has been established. As it has been used as the overall basis of the Core Strategy, this is a fundamental fault in the research and analysis of the evidence base of the document which results in a need to overhaul housing figures basing them on real evidence of need. FORWARD PLANNING 39. Based on the discussion and evidence referenced above, it is considered that 9600 is not an appropriately justified housing figure for the District. The figure fails to take into account the need for future growth in the District and does not propose effective forward planning which is the main purpose of Core Strategies. 40. The only justification for providing this figure seems to be based on past housing figures. This is contained within the Core Strategy on page 29, paragraph 5.13 which explains how over the last 21 years an average of 400 dwellings have been built per annum in the District and that based on this, a similar rate is achievable in the future. 41. This does not provide for effective forward planning as evidence is based on past results rather than remaining focused on future growth. It is evident from the projected
population figures that population is expected to increase and if Wealden are unable to accommodate this growth, it will force people to reside outside of the District. This increases pressure on neighbouring authorities who suffer their own constraints and it is the responsibility of Wealden District Council to address this growth properly.

**PROPOSED REVISED HOUSING FIGURES** 42. The South East Plan allocated 11,000 dwellings to the District based on national housing figures and fair distribution across the region taking into account policy considerations of each District and national housing need. The DCLG policy based population and housing projections are run under the same assumptions of the trend based projections in terms of fertility, mortality and migration level, but additionally they take into account the number of houses planned to be built during the projection period. The migration level is then adjusted according to the future housing provision. This information has been obtained in response to a specific enquiry from East Sussex County Council, correspondence of which has been attached as Appendix 1. 43. On this basis it is considered that the policy based projections fairly assess population growth and the requirements of the District. It is therefore proposed that in order to accommodate the requirement for more housing based on the evidence addressed above, it is fundamental to work towards a figure of 13,000 as proposed both by the South East Plan and justified by policy based household projections. If this position is not concurred with then the 11,000 figure allocated within the South East Plan must be taken as an absolute minimum.

44. This will then adequately accommodate for projected population growth, in-migration and economic prosperity. It will also accommodate for changing demographics of smaller households and an increase in housing will greatly help to address the apparent affordability problems in the District. It will encourage a greater choice of types and tenures of housing and subject to national requirements, affordable housing can be promoted through larger housing development schemes. DISTRIBUTION OF HOUSING 45. This section of the representations discusses the distribution of housing, primarily between the north and south of the District but also in terms of the manner of the council's treatment of the settlement hierarchy. The first notable point is many of the significant potential infrastructure constraints, such as waste water treatment capacity and inadequate road infrastructure, are focused on the south of the District. This is where a large majority of the housing has been allocated. The Strategy acknowledges that further development here would be limited due to these constraints, but the overall approach to dealing with levels of development in the south in the South East Plan is acknowledged. It is accepted that the council's approach to development in these areas is acceptable in principle, although there are one or two instances where we consider that the degree of emphasis on development in the south has resulted in proposed locations for housing that are inappropriate. 46. The discussion earlier in this document highlights the very significant and acknowledged need for a more substantial housing figure in the District. Given that the general approach to housing provision and location in the south is acceptable consideration therefore needs to be given in the Strategy to additional provision in the north of the District at an appropriate scale and in locations that reflect the need to consider the appropriateness of settlement hierarchy. 47. Crowborough is the largest town in the District and is designated as a District Centre within the Core Strategy. Given its close proximity to Tunbridge Wells it is the most appropriate location to accommodate the requirement for more housing. This will help to achieve the aims of providing more development to support growth and improving retail and employment opportunities and the provision of affordable housing in the north of the District. 48. Presently, the majority of development within the north of the District is focused in a single urban extension to the west of Uckfield (SD1). Expansion of Uckfield in this manner is considered to be inappropriate due to issues including traffic congestion, capacity, flood risk, noise from the A22 and the sites prominence in the wider landscape and the very exposed views from the Uckfield bypass. These issues have already been highlighted with the council's Strategic Housing Land Availability Assessment (SHLAA). 49. This site would represent a major incursion into unspoilt countryside that will have a very seriously damaging effect on a wide area and will completely change the setting of the town and its relationship to the surrounding countryside. That is because of the prominence of the location and its poor relationship in a landscape sense to the town, from which it is almost entirely visually detached by virtue of the topography of the area and the openness of the location to the surrounding area. CROWBOROUGH 50. The proposed submission Strategy significantly detracts from the potential of Crowborough, which is better placed in the District in terms of accessibility and has excellent education and health facilities that are at least comparable with those of Uckfield. Crowborough is in need of town centre regeneration, although it has shown that even in present recessionary times the basic strength of the centre is apparent though increases in the retail offering in terms of quality and floorspace. New social infrastructure to support its population is being provided; work having commenced on the new community building in the centre of the town. 51. There is a perceived conflict between development at Crowborough and its environmental status as a result of the relationship of the town to the AONB that surrounds it and of the proximity of Ashdown Forest as a major recreational facility that is at the same time an important environmental asset as a result of its status as a SSSI. However, given that the Forest is a major regional attraction it is not considered that growth at Crowborough will make any real difference to the health and wellbeing of the Forest per se, when regional growth figures are such that the population will generally be increasing and it is inevitable that the attractiveness of the Forest will make it an increasingly used resource by the existing and increasing population over a wide area. The Core Strategy in any case rightly seeks to draw a zone within which development that would potentially affect the Forest would be prevented. 52. On the basis of the comments we have made earlier and in view of our conclusions above we consider that there is a significant opportunity for development at Crowborough that is justified as a result of the need to ensure that overall growth for the District is at a sustainable level that will meet future requirements in an acceptable fashion. A level of development that achieves that aim is the minimum that the strategy should be proposing. There are, however,
recognised constraints to the town and therefore a need to consider the most appropriate general location for
development in terms of landscape impact and accessibility. We also consider that it would be appropriate for the
council to consider a single major location for development on the basis that the necessary infrastructure to serve
such a development can be provided more effectively and efficiently and that it will be easier to provide the funding
for regeneration and community projects with a single development rather than from a number of smaller sites. 53.
Crowborough has landscape and environmental constraints on much of its periphery and in addition the growth of
the town in the past has been such that accessibility, particularly to the south, is very constrained. Southern areas
of the town are far removed from the A26, which is required for access to the north and south, and by poor road
infrastructure in the intervening areas that is incapable of improvement to an acceptable degree to support major
development. Despite the fact that the rail station is located to the south east and there are areas to the south east
of the town that do not lie within the AONB it is not possible to identify a suitable location for development adjacent
to the town that is suitable in a landscape and environmental capacity and with appropriate accessibility
characteristics within close proximity of the station. Thus, although the Strategy seeks to accommodate a relatively
large development area to the south of the town it is not considered that that could realistically be achieved in an
acceptable way. While the fact that that area is not within the AONB might initially be seen to be a benefit there are
significant access problems that effectively mitigate against all but relatively small levels of development in this
location. 54. Land to the west and north west of the town is in close juxtaposition with Ashdown Forest and the
AONB and has a rural and semi rural character that would be significantly disrupted by new development of any
scale. Accessibility is also relatively poor and there would be some difficulty in integrating development with the
need to protect the Forest and its environs. 55. Land to the north east of the town is within the High Weald AONB
and is open in character, such that there are wide ranging long distance views of the southern slopes in this area
from the Eridge Ridge to the north. The sensitivity of these areas is high in environmental terms as a result and the
character and setting of the town in the landscape would be significantly affected by development in these areas.
56. To the east of the town are Palesgate and Crowborough Ghyll, largely wooded areas mostly owned by the
Town Council and utilised for informal public open spaces that are protected by planning policies and which form
an effective semi rural edge to the town as well as being on a high ridge that gives a significant degree of
enclosure and containment to the south eastern parts of the town. 57. North of the town the land rises gently to a
long sloping ridge that runs west-east between Steel Cross and Boars Head, with Palesgate Forest in the east and
the more open landscape north of the town to the west that contains land suitable for development. Parcels exist in
the area of Steel Cross Road that would be suitable for development but there is a more significant area of land to
the east with Green Lane as an effective western boundary that is not part of the open areas of the AONB that
slopes towards the town and is therefore seen in conjunction with the urban areas rather than the countryside
to the north, and in enclosed from the general landscape. Much of the space is former orchard land that was cleared
many years ago and is now largely vacant or used for horse grazing, and is of no special quality. Although within
the AONB the land is not part of the wider landscape and could be released for development without damage to
landscape character. 58. The land is close to Beacon Community College in Green Lane, and is accessible from
the A26 without being in a location where is has direct access, so that it will not affect the openness of the principle
northern approach to the town, and is within relatively easy reach of the town centre, the train station and facilities
such as the Goldsmiths Leisure Centre via public transport, cycling or walking, at distances of 1.75km, 1.5km and
2.3km respectively. The ease of access to the A26 will mean that there need not be any unacceptable increase in
traffic filtering through the town and disrupting residential areas. 59. There is space within the potential
development area that is allocated for recreational purposes in the council’s Non Statutory Plan that could be
established as a part of larger scale development proposals, sited closer to the top of the ridge to ensure that any
potential views of the site from the north, although already well screened by trees and subject also to the views
that will be available from the north of the rugby clubhouse currently under construction, would not be affected.
The total capacity of the site might be in the order of 600 to 650 dwellings, but there is flexibility to vary that
number in accordance with the extent of need identified through the Core Strategy. 60. Access to the site has
been investigated in principle and details were provided to the council in connection with the previous consultation
process on the “Issues and Options” document. The lan

Details of Changes to be Made:
The representations we have made include the comments on the manner in which the Strategy should be changed
to meet our objections, principally insofar as changes to the level and distribution of development are concerned.
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### Sound

- [ ] Yes
- [ ] No
- [x] Justified
- [ ] Effective
- [x] Consistent with national policy

### Legally Compliant

- [ ] Yes
- [ ] No

### Details of Reasons for Soundness/ Legal Compliance:

**INTRODUCTION** 1. The comments in this document are made on behalf of our clients, Knight Developments and focus on a number of issues raised by the 2011 Core Strategy Proposed Submission Document. Initially the representations address how the housing figures have been derived, the distribution of housing in the District and the uneven balance of strategic development, which is primarily focused in the south of the District. 2. In light of those comments we then consider amendments and additions to the document that should be made to ensure that it makes proper provision for the future planning of the District. In these representations the overall point that we wish to make on behalf of our client is that whilst we support in principle the allocation of housing in the south, and Polegate in particular, it is considered the current strategy does not represent the most appropriate and sustainable approach to the growth of the town and as such the strategy should be revised taking account of natural boundaries and adjacent development whilst minimising the impact on the countryside. Suggestions are made as to how and where such development could be accommodated. 3. We deal first with the context of the Core Strategy and the level of housing development it proposes, in light of a significant failure to justify or explain the levels of development proposed. REGIONAL STRATEGIES 4. PPS 12 provides the guidance for the formation of Core Strategies and the legal requirements in order for an Inspector to declare the plan ‘sound’. Paragraph 4.50 sets out the checks an Inspector must make on the plan in order to fully comply with legislation. These include having regard to national policy and generally conforming to the Regional Spatial Strategy. Paragraph 4.33 in PPS 12 further illustrates this point and seeks to ensure Core Strategies are ‘consistent with national policy and in general conformity with the regional spatial strategy’. 5. The South East Plan allocated 11,000 dwellings to the Wealden District over the 20 year plan period 2006-2026, at a rate of 550 dwellings per annum, whereas the Proposed Submission Core Strategy allocates just 9600 over the 24 year period 2006-2030, an annual rate of 400 dwellings. The differences between the annual rate of dwellings and the plan periods are important to consider here, and this can be done in two ways: - a. The South East Plan period is 2006 - 2026. The Core Strategy plan period is 2006 – 2030; four years longer. The South East Pan requires 11,000 dwellings to be built during that period at a rate of 550 dwellings per annum. The Core Strategy would require just 8000 dwellings to be built between 2006 and 2026 at a rate of 400 dwellings per annum as proposed. This is a deficit of 3000 dwellings between the Core Strategy and the regional requirement. b. Conversely, if the South East Plan annual rate of 550 was applied to the Core Strategy plan period of 2006 – 2030 (24 years), this would amount to a need for 13,200 dwellings over the period 2006 - 2030. The Core Strategy requires only 9600 dwellings over this period, resulting in a deficit of 3600 dwellings. 6. The calculations show a clear deficit in housing provision in the Core Strategy when both annual rates and plan periods are accurately compared. 7. There has been significant debate surrounding the revocation of Regional Strategies and the latest High Court Order has confirmed that the intended abolition of the Regional Strategies by the Coalition Government can now be considered ‘material’ in future planning decisions. However, as the Cala Homes (South) Ltd v Secretary of State for Communities and Local Government and Winchester City Council [2011] EWHC 97 Judgement states, there are distinctions to be made between materiality and weight (paragraph 29). Therefore although this is a material consideration, it is the responsibility of the decision maker to defend their decision if there is any deviation from the guidance contained within the Regional Strategies. ‘Thus, in appropriate circumstances, a local planning authority in the reasonable exercise of its discretion may give no significant weight or even no weight at all to a consideration material to its decision, provided that it has had regard to it’ [our emphasis] (paragraph 30). The point here is quite clear; if the council wishes to deviate from the South East Plan it may do so, but only if there is clear and reasoned explanation given in the Core Strategy document that adequately justifies the approach taken. A failure to properly consider this issue will result in the Core Strategy being deemed unsound. 8. It is also essential in this context to have regard to paragraph 34 of PPS 3, which states ‘Regional Spatial Strategies should set out the level of overall housing provision for the region, broadly illustrated in a housing delivery trajectory, for a sufficient period to enable Local Planning Authorities to plan for housing over a period of at least 15 years.’ 9. The failure of the council to properly consider the appropriate level of housing provision and in addition to fail to properly explain and justify the reasons for the overall levels of growth that are promulgated is a significant deficiency in the Strategy and there is a need to consider substantial amendments to ensure the lack of soundness in this respect is overcome. POPULATION AND HOUSEHOLD PROJECTIONS 10. We have identified above the overarching issues in respect of the Strategy, relating to inadequacy of the council’s housing figure of 9600 over the plan period of 2006-2030 and the failure to adequately justify why that figure should be accepted. In order to properly assess the soundness of the proposed Strategy it is also necessary to discuss actual housing need in relation to demographics and statistical...
information. 11. As we have already made plain, if the Core Strategy does not accord with figures in the South East Plan, the justification for the level of housing provision it proposes should be explained elsewhere. We have therefore examined the document to seek to establish whether such an explanation exists. 12. The only reference to statistical evidence within the Core Strategy is contained on page 13 under paragraph 3.10 which states: ‘Trend based projections(1) show an increase in population in Wealden from 2006 to 2030 of around 19,000 persons, which equates to around 16,800 households.’ 13. This is accompanied by a footnote which offers a reference to Office of National Statistics (ONS) trend based population and housing projections on page 16, paragraph 5.11. This gives similar figures to those which are contained within the Core Strategy of a population increase of 19,200 persons equating to a need for an extra 16,800 households over the period 2006-2030. 15. We have also considered the ‘East Sussex in Figures’ website, which includes both trend based and policy based population and household projections for the different 25 year time periods. We have prepared the table below to highlight the comparison between the trend and policy based figures: - Trend Based Policy based Population projections Population projections 2008 2033 Increase 2001 2026 Increase 143,400 165,400 22,000 140,184 157,935 17,751 Household projections Household projections 2008 2033 Increase 2001 2026 Increase 61,290 77,684 16,394 58,466 71,356 12,890 The above figures have been sourced from www.eastsussexinfigures.org.uk 16. The important issue here is that it is unclear from the Core Strategy documents exactly which figures have been used, and it remains unclear despite our direct enquiries of the council’s in September 2009, and they are modelled on the Chelmer Model. This is mentioned on page 1 of Paper 1 – Development of the Proposed Submission Core Strategy (BP1) also references ONS trend based population and housing projections on page 16, paragraph 5.11. This gives similar figures to those which are contained within the Core Strategy of a population increase of 19,200 persons equating to a need for an extra 16,800 households over the period 2006-2030. 15. We have also considered the ‘East Sussex in Figures’ website, which includes both trend based and policy based population and household projections for the different 25 year time periods. 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These may then have been adjusted to fit in to the plan period of 2006-2030. 17. The trend based 2008 population projections were published by the Office for National Statistics (ONS) in May 2010 and the trend based housing projections are based on these figures but contain new household type categories recently developed by the Department of Communities and Local Government. 18. The trend based figures shown above are similar to the figures referenced in the Core Strategy, taking into account the adjustment of dates. However the footnote on page 13 refers to 13,000 additional dwellings, which is below any trend based figures previously referenced. It appears therefore that this may relate to the policy based figures, which are similar to the policy based household projection shown above (12,890), although there is some variation as the footnote references 2006-2031 and the above figures relate to 2001-2026. 19. The policy based figures shown above are described on the East Sussex in Figures website as being derived from housing provision figures provided within the South East Plan, housing trajectory work provided by the relevant council’s in September 2009, and they are modelled on the Chelmer Model. This is mentioned on page 16 of BP1 in paragraph 5.12 where it is noted that: - ‘Due to the complexity of the model, the information used to predict future demand can not be examined in any great detail.’ 20. This is insufficient as the basis for the projections for future growth within the Core Strategy relies on these figures and it is the purpose of Background Papers to adequately explain these findings. This is especially the case as the council’s figures have been inadequately referenced and deviate considerably from all other relevant sources. 21. It is noted that although the footnote on page 13 of the Core Strategy is not properly referenced and there is no background information relating to how this information has been derived, the number of households (13,500) is more than the number of additional dwellings required (13,000). It is assumed that the extra 500 homes have been accommodated for through the council’s own information regarding long term empty dwellings in the District, short term empty dwellings due to an occupant’s death or houses currently being sold on the market. However it is considered that this slight drop in the number of households compared to the number of dwellings required is not greatly significant to argue for less housing need. Furthermore these figures have not been adequately referenced or justified and the calculations used to reach these figures are unavailable. HOUSING REQUIREMENT 22. It is predominantly trend based population and household projections which have been referenced within the Core Strategy where it is then explained on page 13, paragraph 3.10 that: ‘This shows the demand for both market and affordable housing is high, and in excess of that which could be accommodated or delivered within Wealden.’ 23. This appears to be the basis of the council’s approach to the Core Strategy as a matter of basic principle; that the level of housing proposed for the District is less than the figure of new dwellings required by reference to regional policy and less than that indicated to be required by all other relevant sources for the reason that the District has insufficient capacity to accommodate housing at the levels required. This is the sole extent to which the council attempts to justify the 9600 housing figure. 24. However, there is no adequate explanation anywhere in the Strategy as to why the projected increase in households cannot be accommodated in the District. Of even greater importance, the Strategy, having stated that insufficient dwellings to meet identified need will be allowed for, fails in any way to consider or try to quantify the potentially significant social, economic and housing problems that an acknowledged failure to meet projected future requirements will cause. AFFORDABLE HOUSING 25. It is notable in respect of the council’s failure to deal with these issues that in Background Paper 1 – Development of the Proposed Submission Core Strategy (BP1) the council repeatedly concludes that high levels of housing are required within the District and acknowledges that this need is identified in a variety of demographic and statistical evidence. 26. The issue of affordable housing is raised within the Core Strategy in Background Papers 1 – Development of the
Proposed Submission Core Strategy and 2 – Managing the Delivery of Housing. The Council’s Housing Needs Assessment (January 2010) is referenced on page 17, paragraph 5.14 of BP1 which describes how the need for affordable housing cannot be accommodated within the District despite evidence showing a great need. This is again referenced within BP2 (page 3, paragraph 2.3) where the council’s Strategic Housing Market Assessment (SHMA) has also been referred to which addresses ‘very significant affordability issues’ within the District. BP2 (page 3, paragraph 2.3) also identifies Wealden as one of the highest house price areas in the country. 27. However, there is no correlation between the extent to which the failure to produce adequate levels of affordable housing that would result from the overall approach to Core Strategy housing provision would result in social deprivation and other long term problems for the population of the District. That is in our view a fundamental deficiency of the Strategy. DEMOGRAPHICS 28. BP2 - Managing the Delivery of Housing (page 3, paragraph 2.4) - explains the demographic structure of population and households within the District. There are a number of trends which have been referred to, including a decrease in household size, resulting in more single person households, particularly the elderly. The demand for housing from demographic evidence, coupled with the economic prosperity considerations below, mean that the overall health of the District depends on a future growth in population. It is therefore the responsibility of the council to provide enough housing both of the correct type and in the correct location, in accordance with the nature of demand outlined above. ECONOMIC PROSPERITY 29. It is a requirement of PPS 4 Planning for Sustainable Economic Growth, that local authorities should include within their plans a clear economic vision for their areas which ‘positively and proactively encourages sustainable economic growth’ (page 7, EC2.1 (a)). 30. Due to the need to maintain an economically active and consumer based population in line with PPS 4, in-migration is encouraged by the council. BP2, page 3, paragraph 2.4 states:- ‘In order to maintain the viability of services and facilities and the vitality of the local economy there is therefore a requirement for significant new housing development within the District which would encourage some in-migration in order to maintain population levels’. 31. In addition, ONS figures for 2007 indicate a net inward migration from within the UK to Wealden of 800 people (arising from 7,800 leaving the District and 8,600 entering), which demonstrates in-migration is occurring and adds to the demand for housing within the District. 32. It is noted within BP2, page 3, paragraph 2.4: - ‘This natural change, leading to a declining and more elderly population, could have a potentially very damaging effect on the future customer base on existing services and facilities within the District as well as for the viability and vitality of Wealden’s town centres by reducing the economically active sector.’ 33. This effectively acknowledges that on economic grounds an increase in the population that would be the result of a higher level of housing growth is required to enable the District to maintain and improve its economic base and to facilitate protection of existing employment levels and facilitate employment growth. 34. None of these considerations relating to housing and economic need are evident within the housing figures which the Core Strategy proposes overall. The low figure of 9600 is not adequately justified within any of these documents, despite evidence to show that higher levels of housing are needed and would be beneficial to the future growth of Wealden, particularly to maintain the vitality of town centres and support economic growth. CONSTRAINTS WITHIN WEALDEN 35. The Core Strategy and BP1 identify constraints within the District which is considered to restrict housing growth in certain areas. These are outlined on page 23 of BP1, paragraph 6.2 and include the issues of waste water treatment capacity in the south of the District and the need to protect the rural nature of the District and the High Weald AONB. Also included within constraints for Uckfield, Polegate and Hailsham in the Core Strategy are traffic management and congestion problems in the town centres with significant infrastructure improvements required. 36. However this must be contrasted against the above evidence where ONS figures show a demand for housing given the projected increase in population, the overwhelming need for affordable housing and the need for in-migration to tackle population needs of the Wealden District and support economic prosperity. This goes to the heart of the need for the Core Strategy, which should seek to plan positively for appropriate growth in balance with the acknowledgement of constraints, rather than reducing growth rates arbitrarily. 37. Although these constraints and needs have been referred to within the documents relating to the Core Strategy, there is no statistical analysis to ascertain how the 9600 housing figure has been decided. There is also no explanation as to why the figures have been decreased from the South East Plan allocation, which for the Core Strategy plan period would be 13,200, or as to why the proposed allocation fails to meet household projections to an even greater extent. It is our case that the need for housing has not been appropriately analysed and a figure of 9600 does not address the evidence, which clearly shows the requirement for housing. 38. This conclusion merely concurs with that which has been reached repeatedly through BP1, and in particular on page 21, paragraph 5.37, which supports the above points in relation to a significant need for housing growth. The discussion which follows on the constraints to development does not attempt to expand on the nature of these problems and by how much they would limit new housing development. Therefore without robust statistical analysis and an unclear analysis of ONS projections it not possible to ascertain how the housing figure of 9600 has been established. As it has been used as the overall basis of the Core Strategy, this is a fundamental fault in the research and analysis of the evidence base of the document which results in a need to overhaul housing figures basing them on real evidence of need. FORWARD PLANNING 39. Based on the discussion and evidence referenced above, it is considered that 9600 is not an appropriately justified housing figure for the District. The figure fails to take into account the need for future growth in the District and does not propose effective forward planning which is the main purpose of Core Strategies. 40. The only justification for providing this figure seems to be based on past housing figures. This is contained within the Core Strategy on page 29, paragraph 5.13 which explains how over the last 21 years an average of 400 dwellings have been built per annum in the District and that
based on this, a similar rate is achievable in the future. 41. This does not provide for effective forward planning as evidence is based on past results rather than remaining focused on future growth. It is evident from the projected population figures that population is expected to increase and if Wealden are unable to accommodate this growth, it will force people to reside outside of the District. This increases pressure on neighbouring authorities who suffer their own constraints and it is the responsibility of Wealden District Council to address this growth properly.

PROPOSED REVISED HOUSING FIGURES 42. The South East Plan allocated 11,000 dwellings to the District based on national housing figures and fair distribution across the region taking into account policy considerations of each District and national housing need. The DCLG policy based population and housing projections are run under the same assumptions of the trend based projections in terms of fertility, mortality and migration level, but additionally they take into account the number of houses planned to be built during the projection period. The migration level is then adjusted according to the future housing provision. This information has been obtained in response to a specific enquiry from East Sussex County Council, correspondence of which has been attached as Appendix 1. 43. On this basis it is considered that the policy based projections fairly assess population growth and the requirements of the District. It is therefore proposed that in order to accommodate the requirement for more housing based on the evidence addressed above, it is fundamental to work towards a figure of 13,000 as proposed both by the South East Plan and justified by policy based household projections. If this position is not concurred with then the 11,000 figure allocated within the South East Plan must be taken as an absolute minimum. 44. This will then adequately accommodate for projected population growth, in-migration and economic prosperity. It will also accommodate for changing demographics of smaller households and an increase in housing will greatly help to address the apparent affordability problems in the District. It will encourage a greater choice of types and tenures of housing and subject to national requirements, affordable housing can be promoted through larger housing development schemes.

DISTRIBUTION OF HOUSING 45. This section of the representations discusses the distribution of housing, primarily between the north and south of the District but also in terms of the manner of the council’s treatment of the settlement hierarchy. The first notable point is many of the significant potential infrastructure constraints, such as waste water treatment capacity and inadequate road infrastructure, are focused on the south of the District. This is where a large majority of the housing has been allocated. The Strategy acknowledges that further development here would be limited due to these constraints, but the overall approach to dealing with levels of development in the south in the South East Plan is acknowledged. It is accepted that the council’s approach to development in these areas is acceptable in principle, although there are one or two instances where we consider that the degree of emphasis on development in the south has resulted in proposed locations for housing that are inappropriate. 46. The discussion earlier in this document highlights the very significant and acknowledged need for a more substantial housing figure in the District. Given that the general approach to housing provision and location in the south is acceptable consideration therefore needs to be given in the Strategy to additional provision in the north of the District at an appropriate scale and in locations that reflect the need to consider the appropriateness of the settlement hierarchy. 47. These representations will now focus on the Strategy’s approach to development within the southern area of the District, specifically with regard to the future growth of the Polegate area.

POLEGATE AND WILLINGDON 48. The proposed submission proposes 700 houses for the area of Polegate and Willingdon which will contribute to the Strategy’s approach to locate a higher proportion of housing in the south of the District. This is supported due to the existing built urban character of the area and the extent of strategic infrastructure, particularly the proximity to road and rail networks. 49. The location of development should reflect the need to ensure that sustainable locations are given priority and that opportunity is taken to utilise land that lies close to the urban area and where at all possible within landscape features such as major roads that will act as firm defensible boundaries. This will also benefit the protection of landscapes that adjoin the area that are of local and national importance, including the South Downs to the south west and the Pevensey Levels located to the north east. These representations address the approach of the strategy in relation to this expansion of the town and the finer principles of this approach. Development Boundaries 50. The aims of the Strategy outlined in 6.31 underlie its main approach in fostering the growth of Polegate. One of these aims refers to the approach of supporting appropriate development within the built up areas of Polegate within the development boundaries of the town. Before commenting on this overall approach of the strategy we make comment on the future development boundaries of the town, as this will have far reaching consequences on the future growth of the development of Polegate. 51. The existing policy document for the District, Wealden Local Plan 1998 through its Proposal Map defines the development boundary of Polegate to the northern boundary of the existing housing development falling short of the line of the A27 trunk road, leaving land located between the two outside of the development boundary. The positioning of this boundary preceded the construction of the A27 trunk Road, which was completed in 2002. 52. Because of the changes in circumstances we consider that the Core Strategy should be formulated on the basis that the development boundary for Polegate should be aligned with the A27. That will provide an effective and appropriate barrier to development and should represent the limit of the growth of Polegate to the north. Although such issues such as development boundaries may be considered as part of the council’s later Local Development Framework documents, the Core Strategy should be formulated with this in mind as this has the potential to influence the location of future sites that can be accommodated within the town. Location of Development 53. Realignment of the development boundary with the A27, will provide the opportunity to allow the appropriate infill of housing development between the existing urban area to the northern extremities of Polegate and the A27. It is considered logical in the circumstances to apply this approach to this part of Polegate. By focusing housing adjacent to existing built up areas and which are already bounded by existing

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development the level of housing required can be provided in a manner that is both sensitive and sustainable in its location and can be absorbed within the fabric of the town and the existing services and infrastructure. 54. The council confirmed in the SHLAA report that this approach of infilling land between the built settlement and the A27 would have limited impact on the wider landscape. The land to the north of Polegate is separated from the Highways land bordering the A27 by bunding and heavy tree planting and thus any housing to the expansion to the north of Polegate would be well screened and mitigated from any environmental impacts that may result from the adjacent A27. An example of such of land north of Polegate is land that lies adjacent to Greenleaf Gardens which embodies the approach of extending towards the development boundary that the A27 provides whilst relating well to existing built up areas and its ancillary services and infrastructure. A plan of the land at Greenleaf Gardens that illustrates this infill approach is included as Appendix 2 of this document. 55. The approach to the location of development outlined above would be more appropriate and less harmful than that proposed in the Core Strategy, which proposes a southern extension of Polegate towards Willingdon, with the majority of the 700 houses to be located to the south and south east of Polegate to the eastern side of Eastbourne Road. This expansion would lie close to an area within Flood Zone 2 and thus would contribute to pressures on flooding and adjacent land, and in addition it is considered that the role this land plays in the overall landscape, both physically and visually, is a significant factor that should mean development in that location should be subject to particular scrutiny. The land acts as a ‘buffer’ between Polegate and Willingdon, which essentially represents the outer reaches of Eastbourne, and is important in maintaining the identity of the town and its sense of place. 56. For these reasons the scale of development south of Polegate should be limited in scale to take account of the opportunities for development that lie within defensible boundaries at the north of the town. GENERAL SUMMARY 57. It follows from the general arguments set out above that we consider that the overall position of the proposed Core Strategy is such that it has not been demonstrated to any satisfactory degree that it represents a reasonable approach to meeting acknowledged housing demand. While the strategy appears satisfactory in dealing with the generalities of the amount of growth it provides for there is a significant failure to deliver sufficient housing to meet the actual likely future requirement, particularly in the north of the District. 58. The inclusion within the Core Strategy of housing figures that are below those of the South East Plan and below those in ONS projections is not justified or, importantly, explained in any meaningful way in the document, and in the absence of such adequate explanation it can only be concluded that the Strategy is unsound and will fail to provide an adequate future policy base. 59. The housing figures allocated within the Core Strategy are not sufficient to accommodate adequate growth in the District and would result in the plan failing the tests of soundness. The 9600 housing figure has not been derived from robust statistical analysis and instead relies upon past annual housing figures. The Core Strategy overall housing figures therefore fail to accommodate for future growth and effective forward planning. 60. It is considered that there is a need to allocate 13,000 dwellings over the plan period 2006-2030 to adequately address the issues relating to policy based population growth and housing requirements. Moreover, here are a number of suitable locations within the District available for housing development which do not compromise the constraints highlighted within the Core Strategy. 61. The failure of the Core Strategy to make provision in this way means that additional housing allocations are necessary in order to meet likely future requirements. The balance of the Strategy is significantly weighted towards the south of the District and in very general terms this overall approach to housing and economic development in the south, and the balance with necessary associated infrastructure provision, is justified. 62. The approach of the strategy in respect of Polegate is incorrect and would be harmful to the future of the town by way of its impact on the landscape and on the identity of the town. The strategy should be reassessed to incorporate the use of the surrounding infrastructure as development boundaries whilst using infill development to limit the impact on the surrounding countryside. 63. In order for the council to focus on effective forward planning, it must appropriately consider the identified housing requirement and sustainable distribution of housing development which should be based on statistical analysis and balanced policy considerations. This will encourage economic prosperity in identified town centres, encourage a greater choice of housing which will help to tackle affordability issues and ensure the continued vitality of the District's towns without compromising the rural nature of the District.

Details of Changes to be Made:
The representations we have made include proposed changes to the Strategy, particularly insofar as the level and distribution of development are concerned
INTRODUCTION 1. The comments in this document are made on behalf of clients with specific interest in land north of Hailsham and focus on a number of issues raised by the 2011 Core Strategy Proposed Submission Document. Initially the representations address how the housing figures have been derived, the distribution of housing in the District and the balance of strategic development, which is primarily focused in the south of the District. 2. In light of those comments we then consider amendments and additions to the document that should be made to ensure that it makes proper provision for the future planning of the District. In these representations the overall points that we wish to make on behalf of our clients are: they support the Strategy in respect of its allocation for development in the south of the District and particularly support the expansion of North Hailsham; they consider the strategy should carefully consider the nature and location of this growth and how other uses are incorporated into the strategy for this area; and in particular they consider the scale and distribution of employment provision in view of the appropriate economic benefits to the area. 3. We deal first with the context of the Core Strategy and the level of housing development it proposes, in light of a significant failure to justify or explain the levels of development proposed. REGIONAL STRATEGIES 4. PPS 12 provides the guidance for the formation of Core Strategies and the legal requirements in order for an Inspector to declare the plan ‘sound’. 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We have identified above the overarching issues in respect of the Strategy, relating to inadequacy of the council’s housing figure of 9600 over the plan period of 2006-2030 and the failure to adequately justify why that figure should be accepted. In order to properly assess the soundness of the proposed Strategy it is also necessary to discuss actual housing need in relation to demographics and statistical
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Both this comment and the direct reference in paragraph 3.10 indicate the need for a level of future housing that is considerably in excess of the council’s figure. 14. Background Paper 1 – Development of the Proposed Submission Core Strategy (BP1) also references ONS trend based population and housing projections on page 16, paragraph 5.11. This gives similar figures to those which are contained within the Core Strategy of a population increase of 19,200 persons equating to a need for an extra 16,800 households over the period 2006-2030. 15. We have also considered the ‘East Sussex in Figures’ website, which includes both trend based and policy based population and household projections for the different 25 year time periods. 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These may then have been adjusted to fit in to the plan period of 2006-2030. 17. The trend based 2008 population projections were published by the Office for National Statistics (ONS) in May 2010 and the trend based housing projections are based on these figures but contain new household type categories recently developed by the Department of Communities and Local Government. 18. The trend based figures shown above are similar to the figures referenced in the Core Strategy, taking into account the adjustment of dates. However the footnote on page 13 refers to 13,000 additional dwellings, which is below any trend based figures previously referenced. It appears therefore that this may relate to the policy based figures, which are similar to the policy based household projection shown above (12,890), although there is some variation as the footnote references 2006-2031 and the above figures relate to 2001-2026. 19. The policy based figures shown above are described on the East Sussex in Figures website as being derived from housing provision figures provided within the South East Plan, housing trajectory work provided by the relevant council’s in September 2009, and they are modelled on the Chelmer Model. This is mentioned on page 16 of BP1 in paragraph 5.12 where it is noted that: - ‘Due to the complexity of the model, the information used to predict future demand can not be examined in any great detail.’ 20. This is insufficient as the basis for the projections for future growth within the Core Strategy relies on these figures and it is the purpose of Background Papers to adequately explain these findings. This is especially the case as the council’s figures have been inadequately referenced and deviate considerably from all other relevant sources. 21. It is noted that although the footnote on page 13 of the Core Strategy is not properly referenced and there is no background information relating to how this information has been derived, the number of households (13,500) is more than the number of additional dwellings required (13,000). It is assumed that the extra 500 homes have been accommodated for through the council’s own information regarding long term empty dwellings in the District, short term empty dwellings due to an occupant’s death or houses currently being sold on the market. However it is considered that this slight drop in the number of households compared to the number of dwellings required is not greatly significant to argue for less housing need. Furthermore these figures have not been adequately referenced or justified and the calculations used to reach these figures are unavailable. HOUSING REQUIREMENT 22. It is predominantly trend based population and household projections which have been referenced within the Core Strategy where it is then explained on page 13, paragraph 3.10 that: ‘This shows the demand for both market and affordable housing is high, and in excess of that which could be accommodated or delivered within Wealden.’ 23. This appears to be the basis of the council’s approach to the Core Strategy as a matter of basic principle; that the level of housing proposed for the District is less than the figure of new dwellings required by reference to regional policy and less than that indicated to be required by all other relevant sources for the reason that the District has insufficient capacity to accommodate housing at the levels required. This is the sole extent to which the council attempts to justify the 9600 housing figure. 24. However, there is no adequate explanation anywhere in the Strategy as to why the projected increase in households cannot be accommodated in the District. Of even greater importance, the Strategy, having stated that insufficient dwellings to meet identified need will be allowed for, fails in any way to consider or try to quantify the potentially significant social, economic and housing problems that an acknowledged failure to meet projected future requirements will cause. AFFORDABLE HOUSING 25. It is notable in respect of the council’s failure to deal with these issues that in Background Paper 1 – Development of the Proposed Submission Core Strategy (BP1) the council repeatedly concludes that high levels of housing are required within the District and acknowledges that this need is identified in a variety of demographic and statistical evidence. 26. The issue of affordable housing is raised within the Core Strategy in Background Papers 1 – Development of the
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That is in our view a fundamental deficiency of the Strategy. DEMOGRAPHICS 28. BP2 - Managing the Delivery of Housing (page 3, paragraph 2.4) - explains the demographic structure of population and households within the District. There are a number of trends which have been referred to, including a decrease in household size, resulting in more single person households, particularly the elderly. The demand for housing from demographic evidence, coupled with the economic prosperity considerations below, mean that the overall health of the District depends on a future growth in population. It is therefore the responsibility of the council to provide enough housing both of the correct type and in the correct location, in accordance with the nature of demand outlined above. ECONOMIC PROSPERITY 29. 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None of these considerations relating to housing and economic need are evident within the housing figures which the Core Strategy proposes overall. The low figure of 9600 is not adequately justified within any of these documents, despite evidence to show that higher levels of housing are needed and would be beneficial to the future growth of Wealden, particularly to maintain the vitality of town centres and support economic growth. CONSTRAINTS WITHIN WEALDEN 35. The Core Strategy and BP1 identify constraints within the District which is considered to restrict housing growth in certain areas. These are outlined on page 23 of BP1, paragraph 6.2 and include the issues of waste water treatment capacity in the south of the District and the need to protect the rural nature of the District and the High Weald AONB. Also included within constraints for Uckfield, Poleygate and Hailsham in the Core Strategy are traffic management and congestion problems in the town centres with significant infrastructure improvements required. 36. However this must be contrasted against the above evidence where ONS figures show a demand for housing given the projected increase in population, the overwhelming need for affordable housing and the need for in-migration to tackle population needs of the Wealden District and support economic prosperity. This goes to the heart of the need for the Core Strategy, which should seek to plan positively for appropriate growth in balance with the acknowledgement of constraints, rather than reducing growth rates arbitrarily. 37. Although these constraints and needs have been referred to within the documents relating to the Core Strategy, there is no statistical analysis to ascertain how the 9600 housing figure has been decided. There is also no explanation as to why the figures have been decreased from the South East Plan allocation, which for the Core Strategy plan period would be 13,200, or as to why the proposed allocation fails to meet household projections to an even greater extent. It is our case that the need for housing has not been appropriately analysed and a figure of 9600 does not address the evidence, which clearly shows the requirement for housing. 38. This conclusion merely concurs with that which has been reached repeatedly through BP1, and in particular on page 21, paragraph 5.37, which supports the above points in relation to a significant need for housing growth. The discussion which follows on the constraints to development does not attempt to expand on the nature of these problems and by how much they would limit new housing development. Therefore without robust statistical analysis and an unclear analysis of ONS projections it not possible to ascertain how the housing figure of 9600 has been established. As it has been used as the overall basis of the Core Strategy, this is a fundamental fault in the research and analysis of the evidence base of the document which results in a need to overhaul housing figures basing them on real evidence of need. FORWARD PLANNING 39. Based on the discussion and evidence referenced above, it is considered that 9600 is not an appropriately justified housing figure for the District. The figure fails to take into account the need for future growth in the District and does not propose effective forward planning which is the main purpose of Core Strategies. 40. The only justification for providing this figure seems to be based on past housing figures. This is contained within the Core Strategy on page 29, paragraph 5.13 which explains how over the last 21 years an average of 400 dwellings have been built per annum in Wealden and that
based on this, a similar rate is achievable in the future. 41. This does not provide for effective forward planning as evidence is based on past results rather than remaining focused on future growth. It is evident from the projected population figures that population is expected to increase and if Wealden are unable to accommodate this growth, it will force people to reside outside of the District. This increases pressure on neighbouring authorities who suffer their own constraints and it is the responsibility of Wealden District Council to address this growth properly.

PROPOSED REVISED HOUSING FIGURES 42. The South East Plan allocated 11,000 dwellings to the District based on national housing figures and fair distribution across the region taking into account policy considerations of each District and national housing need. The DCLG policy based population and housing projections are run under the same assumptions of the trend based projections in terms of fertility, mortality and migration level, but additionally they take into account the number of houses planned to be built during the projection period. The migration level is then adjusted according to the future housing provision. This information has been obtained in response to a specific enquiry from East Sussex County Council, correspondence of which has been attached as Appendix 1. 43. On this basis it is considered that the policy based projections fairly assess population growth and the requirements of the District. It is therefore proposed that in order to accommodate the requirement for more housing based on the evidence addressed above, it is fundamental to work towards a figure of 13,000 as proposed both by the South East Plan and justified by policy based household projections. If this position is not concurred with then the 11,000 figure allocated within the South East Plan must be taken as an absolute minimum. 44. This will then adequately accommodate for projected population growth, in-migration and economic prosperity. It will also accommodate for changing demographics of smaller households and an increase in housing will greatly help to address the apparent affordability problems in the District. It will encourage a greater choice of types and tenures of housing and subject to national requirements, affordable housing can be promoted through larger housing development schemes.

DISTRIBUTION OF HOUSING 45. This section of the representations discusses the distribution of housing, primarily between the north and south of the District but also in terms of the manner of the council’s treatment of the settlement hierarchy. The first notable point is many of the significant potential infrastructure constraints, such as waste water treatment capacity and inadequate road infrastructure, are focused on the south of the District. This is where a large majority of the housing has been allocated. The Strategy acknowledges that further development here would be limited due to these constraints, but the overall approach to dealing with levels of development in the south in the South East Plan is acknowledged. It is accepted that the councils approach to development in these areas is acceptable in principle, although there are one or two instances where we consider that the degree of emphasis on development in the south has resulted in proposed locations for housing that are inappropriate. 46. The discussion earlier in this document highlights the very significant and acknowledged need for a more substantial housing figure in the District. Given that the general approach to housing provision and location in the south is acceptable consideration therefore needs to be given in the Strategy to additional provision in the north of the District at an appropriate scale and in locations that reflect the need to consider the appropriateness of the settlement hierarchy. HAILSHAM 47. These representations will now focus on the Strategy’s approach to development within the southern area of the District, specifically with regard to the future growth of the Hailsham area and the distribution and type of development that is set out by the Strategy in respect of this area. 48. The general strategy of the expansion of north Hailsham proposed within the draft Core Strategy is considered a sound and appropriate expansion of this growing market town. This expansion will provide further housing in an area suitable for housing in proximity to existing infrastructure whilst connecting the town with the existing development currently being undertaken at Hellingly Hospital located to the north of Hailsham. This northern expansion is the most appropriate location in light of the natural constraints that affect Hailsham, most notably the flood plain on its eastern boundary and the main trunk road that runs to the west and around the south of the town. 49. The Strategy proposes 700 homes and 8650 square metres of employment floorspace to the land north of Hailsham, following future infrastructure improvements to the roads that serve this area. This combination of housing, retail and employment space, proposed within paragraph 6.19 of the Strategy, should provide development that will be self supporting and provide the range of facilities that such an expansion will require. 50. The land itself appears suitable for development in terms of both its topography and location. The development proposed as part of this expansion will also serve to link the ongoing Hellingly Hospital development site within the existing settlement of Hailsham as well as providing services and employment to serve this part of Hailsham. 51. At present north Hailsham is primarily a residential area with the majority of services and employment located to the centre and south of Hailsham. For instance, the main employment sites within Hailsham are largely concentrated to the south of the town, mainly in the industrial estates at Dipllocks Way, South Road and Station Road and thus the Strategy’s approach to provide such employment provision and other uses alongside the significant housing development in the area is a sound one bringing the residential northern part of Hailsham into this expansion and vice versa. 52. As the Strategy proposes a significant amount of new employment in the northern expansion, it is appropriate to assess the extent to which provision of this proposed employment floorspace could be achieved by consolidation and expansion of existing employment sites. This approach would limit further environmental impacts of such uses and would prevent the need to develop or encroach on greenfield sites which in themselves would be subject to significant environmental and ecological constraints, particularly so with regards to the potential impact of such employment and business uses. 53. Furthermore, the existing sites are largely already served by infrastructure and services which would further contribute to the case for using and redeveloping existing employment sites to provide the necessary employment space proposed by the draft Core Strategy. There are a number of sites within the locality of the area north of

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Hailsham that might provide further employment facilities through redevelopment. GENERAL SUMMARY 54. It follows from the general arguments set out above that we consider that the overall position of the proposed Core Strategy is such that it has not been demonstrated to any satisfactory degree that it represents a reasonable approach to meeting acknowledged housing demand. While the strategy appears satisfactory in dealing with the generalities of the amount of growth it provides for there is a significant failure to deliver sufficient housing to meet the actual likely future requirement, particularly in the north of the District. 55. The inclusion within the Core Strategy of housing figures that are below those of the South East Plan and below those in ONS projections is not justified or, importantly, explained in any meaningful way in the document, and in the absence of such adequate explanation it can only be concluded that the Strategy is unsound and will fail to provide an adequate future policy base. 56. The housing figures allocated within the Core Strategy are not sufficient to accommodate adequate growth in the District and would result in the plan failing the tests of soundness. The 9600 housing figure has not been derived from robust statistical analysis and instead relies upon past annual housing figures. The Core Strategy overall housing figures therefore fail to accommodate for future growth and effective forward planning. 57. It is considered that there is a need to allocate 13,000 dwellings over the plan period 2006-2030 to adequately address the issues relating to policy based population growth and housing requirements. Moreover, there are a number of suitable locations within the District available for housing development which do not compromise the constraints highlighted within the Core Strategy. 58. The failure of the Core Strategy to make provision in this way means that additional housing allocations are necessary in order to meet likely future requirements. The balance of the Strategy is significantly weighted towards the south of the District and although the overall approach to housing and economic development, and the balance with necessary associated infrastructure provision, in the south is justified in the Strategy the failure of the Strategy to provide appropriately for development in the north of the District is wrong. 59. The future growth to North Hailsham represents an example of appropriate growth within the south of the District and the Strategy’s approach to incorporate employment provision within this growth is a sound one. Furthermore, the shortfall in housing provision in the plan highlights the need to ensure that the areas suggested for development in the south of the District come forward and the importance of the land at North Hailsham becomes significantly greater in that event in order that the council is able to meet appropriate housing requirements. This should be done in a manner that properly integrates with existing employment sites as a focus for the further proposed future employment provision. 60. In order for the Council to focus on effective forward planning, it must appropriately consider the identified housing requirement and sustainable distribution of housing development which should be based on statistical analysis and balanced policy considerations. This will encourage economic prosperity in identified town centres, encourage a greater choice of housing and affordability issues and ensure the continued vitality of the Districts towns without compromising the rural nature of the District.

Details of Changes to be Made:
Our representations set out the changes we consider necessary to the Strategy
INTRODUCTION 1. The comments in this document are made on behalf of Mr Jerry Houlton and focus on a number of issues raised by the 2011 Core Strategy Proposed Submission Document. Initially the representations address how the housing figures have been derived, the distribution of housing in the District and the uneven balance of strategic development, which is primarily focused in the south of the District. 2. In light of those comments we then consider amendments and additions to the document that should be made to ensure that it makes proper provision for the future planning of the District. In these representations the overall point that we wish to make on behalf of our client is that there should be amendments to the Strategy to focus more development in the north of the District and that, as the largest town, such development should be centred on Crowborough. Suggestions are made as to how and where such development could be accommodated. 3. The purpose of these representations is to support the development of Uckfield, but only on a smaller scale, where development can be assimilated into the landscape setting of the town, close to the existing development boundary. The proposed urban extension to the west of Uckfield contained within the Core Strategy is in a highly unsustainable location, which would have a significant detrimental impact on the local road infrastructure, the topographical nature of the landscape and is at risk of flooding. 4. We deal first with the context of the Core Strategy and the level of housing development it proposes, in light of a significant failure to justify or explain the levels of development proposed. REGIONAL STRATEGIES 5. PPS 12 provides the guidance for the formation of Core Strategies and the legal requirements in order for an Inspector to declare the plan ‘sound’. Paragraph 4.50 sets out the checks an Inspector must make on the plan in order to fully comply with legislation. These include having regard to national policy and generally conforming to the Regional Spatial Strategy. Paragraph 4.33 in PPS 12 further illustrates this point and seeks to ensure Core Strategies are ‘consistent with national policy and in general conformity with the regional spatial strategy’. 6. The South East Plan allocated 11,000 dwellings to the Wealden District over the 20 year plan period 2006-2026, at a rate of 550 dwellings per annum, whereas the Proposed Submission Core Strategy allocates just 9600 over the 24 year period 2006-2030, an annual rate of 400 dwellings. The differences between the annual rate of dwellings and the plan periods are important to consider here, and this can be done in two ways: - a. The South East Plan period is 2006 - 2026. The Core Strategy plan period is 2006 – 2030; four years longer. The South East Pan requires 11000 dwellings to be built during that period at a rate of 550 dwellings per annum. The Core Strategy would require just 8000 dwellings to be built between 2006 and 2026 at a rate of 400 dwellings per annum as proposed. This is a deficit of 3000 dwellings between the Core Strategy and the regional requirement. b. Conversely, if the South East Plan annual rate of 550 was applied to the Core Strategy plan period of 2006 – 2030 (24 years), this would amount to a need for 13,200 dwellings over the period 2006 - 2030. The Core Strategy requires only 9600 dwellings over this period, resulting in a deficit of 3600 dwellings. 7. The calculations show a clear deficit in housing provision in the Core Strategy when both annual rates and plan periods are accurately compared. 8. There has been significant debate surrounding the revocation of Regional Strategies and the latest High Court Order has confirmed that the intended abolition of the Regional Strategies by the Coalition Government can now be considered ‘material’ in future planning decisions. However, as the Cala Homes (South) Ltd v Secretary of State for Communities and Local Government and Winchester City Council [2011] EWHC 97 Judgement states, there are distinctions to be made between materiality and weight (paragraph 29). Therefore although this is a material consideration, it is the responsibility of the decision maker to defend their decision if there is any deviation from the guidance contained within the Regional Strategies. ‘Thus, in appropriate circumstances, a local planning authority in the reasonable exercise of its discretion may give no significant weight or even no weight at all to a consideration material to its decision, provided that it has had regard to it’ [our emphasis] (paragraph 30). The point here is quite clear; if the council wishes to deviate from the South East Plan it may do so, but only if there is clear and reasoned explanation given in the Core Strategy document that adequately justifies the approach taken. A failure to properly consider this issue will result in the Core Strategy being deemed unsound. 9. It is also essential in this context to have regard to paragraph 34 of PPS 3, which states ‘Regional Spatial Strategies should set out the level of overall housing provision for the region, broadly illustrated in a housing delivery trajectory, for a sufficient period to enable Local Planning Authorities to plan for housing over a period of at least 15 years.’ 10. The failure of the council to properly consider the appropriate level of housing provision and in addition to fail to properly explain and justify the reasons for the overall levels of growth that are promulgated is a significant deficiency in the Strategy and there is a need to consider substantial amendments to ensure the lack of soundness in this respect is overcome. POPULATION AND HOUSEHOLD PROJECTIONS 11. We have identified above the overarching issues in respect of the

Summary of all Representations - Proposed Submission Core Strategy Regulation 27 - Report 11th July 2011

Representation ID

347

Person ID  Mr  Houlton

Agent ID  Mr  Stevens

Sound  ☐ Yes  ☑ No  ☑ Justified  ☐ Effective  ☑ Consistent with national policy

Legally Compliant  ☐ Yes  ☑ No

Details of Reasons for Soundess/ Legal Complaince:

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Strategy, relating to inadequacy of the council’s housing figure of 9600 over the plan period of 2006-2030 and the failure to adequately justify why that figure should be accepted. In order to properly assess the soundness of the proposed Strategy it is also necessary to discuss actual housing need in relation to demographics and statistical information. 12. As we have already made plain, if the Core Strategy does not accord with figures in the South East Plan, the justification for the level of housing provision it proposes should be explained elsewhere. We have therefore examined the document to seek to establish whether such an explanation exists. 13. The only reference to statistical evidence within the Core Strategy is contained on page 13 under paragraph 3.10 which states: ‘Trend based projections(1) show an increase in population in Wealden from 2006 to 2030 of around 19,000 persons, which equates to around 16,800 households.’ 14. This is accompanied by a footnote which offers a reference to Office of National Statistics (ONS) trend based projections in addition to different figures from East Sussex County Council. These contain a reference to a population increase of around 20,000 persons equating to 13,500 households and 13,000 additional dwellings. Both this comment and the direct reference in paragraph 3.10 indicate the need for a level of future housing that is considerably in excess of the council’s figure. 15. Background Paper 1 – Development of the Proposed Submission Core Strategy (BP1) also references ONS trend based population and housing projections on page 16, paragraph 5.11. This gives similar figures to those which are contained within the Core Strategy of a population increase of 19,200 persons equating to a need for an extra 16,800 households over the period 2006-2030. 16. 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None of these considerations relating to housing and economic need are evident within the housing figures which the Core Strategy proposes overall. The low figure of 9600 is not adequately justified within any of these documents, despite evidence to show that higher levels of housing are needed and would be beneficial to the future growth of Wealden, particularly to maintain the vitality of town centres and support economic growth. CONSTRAINTS WITHIN WEALDEN 36. The Core Strategy and BP1 identify constraints within the District which is considered to restrict housing growth in certain areas. These are outlined on page 23 of BP1, paragraph 6.2 and include the issues of waste water treatment capacity in the south of the District and the need to protect the rural nature of the District and the High Weald AONB. Also included within constraints for Uckfield, Polegate and Hailsham in the Core Strategy are traffic congestion and congestion problems in the town centres with significant infrastructure improvements required. 37. However this must be contrasted against the above evidence where ONS figures show a demand for housing given the projected increase in population, the overwhelming need for affordable housing and the need for in-migration to tackle population needs of the Wealden District and support economic prosperity. This goes to the heart of the need for the Core Strategy, which should seek to plan positively for appropriate growth in balance with the acknowledgement of constraints, rather than reducing growth rates arbitrarily. 38. Although these constraints and needs have been referred to within the documents relating to the Core Strategy, there is no statistical analysis to ascertain how the 9600 housing figure has been decided. There is also no explanation as to why the figures have been decreased from the South East Plan allocation, which for the Core Strategy plan period would be 13,200, or as to why the proposed allocation fails to meet household projections to an even greater extent. It is our case that the need for housing has not been appropriately analysed and a figure of 9600 does not address the evidence, which clearly shows the requirement for housing. 39. This conclusion merely concurs with that which has been reached repeatedly through BP1, and in particular on page 21, paragraph 5.37, which supports the above points in relation to a significant need for housing growth. The discussion which follows on the constraints to development does not attempt to expand on the nature of these problems and by how much they would limit new housing development. Therefore without robust statistical analysis and an unclear analysis of ONS projections it not possible to ascertain how the housing figure of 9600 has been established. As it has been used as the overall basis of the Core Strategy, this is a fundamental fault in the research and analysis of the evidence base of the document which results in a need to overhaul housing figures basing them on real evidence of need. FORWARD PLANNING 40. Based on the discussion and evidence referenced above, it is considered that 9600 is not an appropriately justified housing figure for the District. The figure fails to take into account the need for future growth in the District and does not propose effective forward
planning which is the main purpose of Core Strategies. 41. The only justification for providing this figure seems to be based on past housing figures. This is contained within the Core Strategy on page 29, paragraph 5.13 which explains how over the last 21 years an average of 400 dwellings have been built per annum in the District and that based on this, a similar rate is achievable in the future. 42. This does not provide for effective forward planning as evidence is based on past results rather than remaining focused on future growth. It is evident from the projected population figures that population is expected to increase and if Wealden are unable to accommodate this growth, it will force people to reside outside of the District. This increases pressure on neighbouring authorities who suffer their own constraints and it is the responsibility of Wealden District Council to address this growth properly.

PROPOSED REVISED HOUSING FIGURES 43. The South East Plan allocated 11,000 dwellings to the District based on national housing figures and fair distribution across the region taking into account policy considerations of each District and national housing need. The DCLG policy based population and housing projections are run under the same assumptions of the trend based projections in terms of fertility, mortality and migration level, but additionally they take into account the number of houses planned to be built during the projection period. The migration level is then adjusted according to the future housing provision. This information has been obtained in response to a specific enquiry from East Sussex County Council, correspondence of which has been attached as Appendix 1. 44. On this basis it is considered that the policy based projections fairly assess population growth and the requirements of the District. It is therefore proposed that in order to accommodate the requirement for more housing based on the evidence addressed above, it is fundamental to work towards a figure of 13,000 as proposed both by the South East Plan and justified by policy based household projections. If this position is not concurred with then the 11,000 figure allocated within the South East Plan must be taken as an absolute minimum. 45. This will then adequately accommodate for projected population growth, in-migration and economic prosperity. It will also accommodate for changing demographics of smaller households and an increase in housing will greatly help to address the apparent affordability problems in the District. It will encourage a greater choice of types and tenures of housing and subject to national requirements, affordable housing can be promoted through larger housing development schemes. DISTRIBUTION OF HOUSING 46. This section of the representations discusses the distribution of housing, primarily between the north and south of the District but also in terms of the manner of the council’s treatment of the settlement hierarchy. The first notable point is many of the significant potential infrastructure constraints, such as waste water treatment capacity and inadequate road infrastructure, are focused on the south of the District. This is where a large majority of the housing has been allocated. The Strategy acknowledges that further development here would be limited due to these constraints, but the overall approach to dealing with levels of development in the south in the South East Plan is acknowledged. It is accepted that the councils approach to development in these areas is acceptable in principle, although there are one or two instances where we consider that the degree of emphasis on development in the south has resulted in proposed locations for housing that are inappropriate. 47. The discussion earlier in this document highlights the very significant and acknowledged need for a more substantial housing figure in the District. Given that the general approach to housing provision and location in the south is acceptable consideration therefore needs to be given in the Strategy to additional provision in the north of the District at an appropriate scale and in locations that reflect the need to consider the appropriateness of settlement hierarchy. 48. Crowborough is the largest town in the District and is designated as a District Centre within the Core Strategy. Given its close proximity to Tunbridge Wells it is the most appropriate location to accommodate the requirement for more housing. This will help to achieve the aims of providing more development to support growth and improving retail and employment opportunities and the provision of affordable housing in the north of the District. 49. Presently, the majority of development within the north of the District is focused in a single urban extension to the west of Uckfield (SD1). Expansion of Uckfield in this manner is considered to be inappropriate due to issues including traffic congestion, capacity, flood risk, noise from the A22 and the sites prominence in the wider landscape and the very exposed views from the Uckfield bypass. These issues have already been highlighted with the council’s Strategic Housing Land Availability Assessment (SHLAA). 50. This site would represent a major incursion into unspoilt countryside that will have a very seriously damaging effect on a wide area and will completely change the setting of the town and its relationship to the surrounding countryside. That is because of the prominence of the location and its poor relationship in a landscape sense to the town, from which it is almost entirely visually detached by virtue of the topography of the area and the openness of the location to the surrounding area. 51. While such large scale development at the town would have widely unacceptable impacts it would be appropriate to seek to focus development in Uckfield on smaller sites which are in close proximity to the existing development boundary. Such housing development would be well integrated with the settlement pattern and would not compromise the landscape quality of the area surrounding the town, the preservation of which is one of the most significant objectives of the council. There is, for instance, land on Snatts Road, immediately adjacent to the development boundary, which has been considered in the SHLAA for a total of 32 net dwellings, which could be delivered within the next six years. A plan of the land is attached as Appendix 2. It would present a minimal impact on the constraints identified at Uckfield but would help to support the small scale development which should be encouraged in Uckfield. GENERAL SUMMARY 52. It follows from the general arguments set out above that we consider that the overall position of the proposed Core Strategy is such that it has not been demonstrated to any satisfactory degree that it represents a reasonable approach to meeting acknowledged housing demand. While the strategy appears satisfactory in dealing with the generalities of the amount of growth it provides for there is a significant failure to deliver sufficient housing to meet the actual likely future requirement, particularly in the north
of the District. 53. The inclusion within the Core Strategy of housing figures that are below those of the South East Plan and below those in ONS projections is not justified or, importantly, explained in any meaningful way in the document, and in the absence of such adequate explanation it can only be concluded that the Strategy is unsound and will fail to provide an adequate future policy base. 54. The housing figures allocated within the Core Strategy are not sufficient to accommodate adequate growth in the District and would result in the plan failing the tests of soundness. The 9600 housing figure has not been derived from robust statistical analysis and instead relies upon past annual housing figures. The Core Strategy overall housing figures therefore fail to accommodate for future growth and effective forward planning. 55. It is considered that there is a need to allocate 13,000 dwellings over the plan period 2006-2030 to adequately address the issues relating to policy based population growth and housing requirements. Moreover, here are a number of suitable locations within the District available for housing development which do not compromise the constraints highlighted within the Core Strategy. 56. The failure of the Core Strategy to make provision in this way means that additional housing allocations are necessary in order to meet likely future requirements. The balance of the Strategy is significantly weighted towards the south of the District and although the overall approach to housing and economic development, and the balance with necessary associated infrastructure provision, in the south is justified in the Strategy the failure of the Strategy to provide appropriately for development in the north of the District is wrong. 57. The allocation of land for 1000 dwellings to the west of Uckfield is manifestly a potential visual and environmental disaster in terms of the relationship to the surrounding rural area and the extremely poor physical and visual links to the urban area of the town. The justification for the development, that it would enable the resolution of transport difficulty in the town centre, is somewhat bizarre given the additional activity and movement that it would generate and that the only means of preventing that would be to ensure that the development was effectively unsustainable by encouraging the population in which it would result to travel elsewhere other than Uckfield for the provision of shops and services. 58. In order for the council to focus on effective forward planning, it must appropriately consider the identified housing requirement and sustainable distribution of housing development which should be based on statistical analysis and balanced policy considerations. This will encourage economic prosperity in identified town centres, encourage a greater choice of housing which will help to tackle affordability issues and ensure the continued vitality of the District’s towns without compromising the rural nature of the District.

Details of Changes to be Made:

Our representations make reference to changes we consider necessary to the Strategy
INTRODUCTION 1. The comments in this document are made on behalf of Starglade Healthcare Ltd and focus on a number of issues raised by the 2011 Core Strategy Proposed Submission Document. Initially the representations address how the housing figures have been derived, the distribution of housing in the District and the uneven balance of strategic development, which is primarily focused in the south of the District. 2. In light of those comments we then consider amendments and additions to the document that should be made to ensure that it makes proper provision for the future planning of the District. In these representations the overall point that we wish to make on behalf of our client is that there should be amendments to the Strategy to focus more development in the north of the District. Suggestions are made as to how and where such development could be accommodated. 3. The purpose of these representations is to support the allocation of small scale development within key villages and service centres within the District as allocated by policy WCS6 – Rural Areas Strategy. There is a need for additional housing in settlements to the north of the District such as Wadhurst to be able to accommodate future housing development. The availability of suitable land on the periphery of the Key Villages should be taken fully into account in the overall strategy, particularly in view of the fact that it is considered there is a significant shortfall in housing provision. That shortfall increases the weight that should be given to the Key Villages. 4. We deal first with the context of the Core Strategy and the level of housing development it proposes, in light of a significant failure to justify or explain the levels of development proposed. REGIONAL STRATEGIES 5. PPS 12 provides the guidance for the formation of Core Strategies and the legal requirements in order for an Inspector to declare the plan ‘sound’. Paragraph 4.50 sets out the checks an Inspector must make on the plan in order to fully comply with legislation. These include having regard to national policy and generally conforming to the Regional Spatial Strategy. Paragraph 4.33 in PPS 12 further illustrates this point and seeks to ensure Core Strategies are ‘consistent with national policy and in general conformity with the regional spatial strategy’. 6. The South East Plan allocated 11,000 dwellings to the Wealden District over the 20 year plan period 2006-2026, at a rate of 550 dwellings per annum, whereas the Proposed Submission Core Strategy allocates just 9600 over the 24 year period 2006-2030, an annual rate of 400 dwellings. The differences between the annual rate of dwellings and the plan periods are important to consider here, and this can be done in two ways: a. If the South East Plan period is 2006 - 2026. The Core Strategy plan period is 2006 – 2030; four years longer. The South East Pan requires 11,000 dwellings to be built during that period at a rate of 550 dwellings per annum. The Core Strategy would require just 8000 dwellings to be built between 2006 and 2026 at a rate of 400 dwellings per annum as proposed. This is a deficit of 3000 dwellings between the Core Strategy and the regional requirement. b. Conversely, if the South East Pan annual rate of 550 was applied to the Core Strategy plan period of 2006 – 2030 (24 years), this would amount to a need for 13,200 dwellings over the period 2006 - 2030. The Core Strategy requires only 9600 dwellings over this period, resulting in a deficit of 3600 dwellings. 7. The calculations show a clear deficit in housing provision in the Core Strategy when both annual rates and plan periods are accurately compared. 8. There has been significant debate surrounding the revocation of Regional Strategies and the latest High Court Order has confirmed that the intended abolition of the Regional Strategies by the Coalition Government can now be considered ‘material’ in future planning decisions. However, as the Cala Homes (South) Ltd v Secretary of State for Communities and Local Government and Winchester City Council [2011] EWHC 97 Judgement states, there are distinctions to be made between materiality and weight (paragraph 29). Therefore although this is a material consideration, it is the responsibility of the decision maker to defend their decision if there is any deviation from the guidance contained within the Regional Strategies. ‘Thus, in appropriate circumstances, a local planning authority in the reasonable exercise of its discretion may give no significant weight or even no weight at all to a consideration material to its decision, provided that it has had regard to it’ [our emphasis] (paragraph 30). The point here is quite clear; if the council wishes to deviate from the South East Plan it may do so, but only if there is clear and reasoned explanation given in the Core Strategy document that adequately justifies the approach taken. A failure to properly consider this issue will result in the Core Strategy being deemed unsound. 9. It is also essential in this context to have regard to paragraph 34 of PPS 3, which states ‘Regional Spatial Strategies should set out the level of overall housing provision for the region, broadly illustrated in a housing delivery trajectory, for a sufficient period to enable Local Planning Authorities to plan for housing over a period of at least 15 years.’ 10. The failure of the council to properly consider the appropriate level of housing provision and in addition to fail to properly explain and justify the reasons for the overall levels of growth that are promulgated is a significant deficiency in the Strategy and there is a need to consider substantial amendment to ensure the lack of soundness in this respect is overcome. POPULATION AND HOUSEHOLD PROJECTIONS 11. We have identified above the
overarching issues in respect of the Strategy, relating to inadequacy of the council’s housing figure of 9600 over the plan period of 2006-2030 and the failure to adequately justify why that figure should be accepted. In order to properly assess the soundness of the proposed Strategy it is also necessary to discuss actual housing need in relation to demographics and statistical information. 12. As we have already made plain, if the Core Strategy does not accord with figures in the South East Plan, the justification for the level of housing provision it proposes should be explained elsewhere. We have therefore examined the document to seek to establish whether such an explanation exists. 13. The only reference to statistical evidence within the Core Strategy is contained on page 13 under paragraph 3.10 which states: ‘Trend based projections(1) show an increase in population in Wealden from 2006 to 2030 of around 19,000 persons, which equates to around 16,800 households.’ 14. This is accompanied by a footnote which offers a reference to Office of National Statistics (ONS) trend based projections in addition to different figures from East Sussex County Council. These contain a reference to a population increase of around 20,000 persons equating to 13,500 households and 13,000 additional dwellings. Both this comment and the direct reference in paragraph 3.10 indicate the need for a level of future housing that is considerably in excess of the council’s figure. 15. Background Paper 1 – Development of the Proposed Submission Core Strategy (BP1) also references ONS trend based population and housing projections on page 16, paragraph 5.11. This gives similar figures to those which are contained within the Core Strategy of a population increase of 19,200 persons equating to a need for an extra 16,800 households over the period 2006-2030. 16. We have also considered the ‘East Sussex in Figures’ website, which includes both trend based and policy based population and household projections for the different 25 year time periods. We have prepared the table below to highlight the comparison between the trend and policy based figures: - Trend Based Policy based Population projections Population projections 2008 2033 Increase 2001 2026 Increase 143,400 165,400 22,000 140,184 157,935 17,751 Household projections Household projections 2008 2033 Increase 2001 2026 Increase 61,290 77,684 16,394 58,466 71,356 12,890 The above figures have been sourced from www.eastsussexinfigures.org.uk 17. The important issue here is that it is unclear from the Core Strategy documents exactly which figures have been used, and it remains unclear despite our direct enquiries of the council on the matter. It seems likely, however, that trend based population and household projections have been obtained from this dataset. It may be the case that the figures above have been updated and that the council’s figures take into account previous figures available from 2006. These may then have been adjusted to fit in to the plan period of 2006-2030. 18. The trend based 2008 population projections were published by the Office for National Statistics (ONS) in May 2010 and the trend based housing projections are based on these figures but contain new household type categories recently developed by the Department of Communities and Local Government. 19. The trend based figures shown above are similar to the figures referenced in the Core Strategy, taking into account the adjustment of dates. However the footnote on page 13 refers to 13,000 additional dwellings, which is below any trend based figures previously referenced. It appears therefore that this may relate to the policy based figures, which are similar to the policy based household projection shown above (12,890), although there is some variation as the footnote references 2006-2031 and the above figures relate to 2001-2026. 20. The policy based figures shown above are described on the East Sussex in Figures website as being derived from housing provision figures provided within the South East Plan, housing trajectory work provided by the relevant council’s in September 2009, and they are modelled on the Chelmer Model. This is mentioned on page 16 of BP1 in paragraph 5.12 where it is noted that: - ‘Due to the complexity of the model, the information used to predict future demand can not be examined in any great detail.’ 21. This is insufficient as the basis for the projections for future growth within the Core Strategy relies on these figures and it is the purpose of Background Papers to adequately explain these findings. This is especially the case as the council’s figures have been inadequately referenced and deviate considerably from all other relevant sources. 22. It is noted that although the footnote on page 13 of the Core Strategy is not properly referenced and there is no background information relating to how this information has been derived, the number of households (13,500) is more than the number of additional dwellings required (13,000). It is assumed that the extra 500 homes have been accommodated for through the council’s own information regarding long term empty dwellings in the District, short term empty dwellings due to an occupant’s death or houses currently being sold on the market. However it is considered that this slight drop in the number of households compared to the number of dwellings required is not greatly significant to argue for less housing need. Furthermore these figures have not been adequately referenced or justified and the calculations used to reach these figures are unavailable. HOUSING REQUIREMENT 23. It is predominantly trend based population and household projections which have been referenced within the Core Strategy where it is then explained on page 13, paragraph 3.10 that: ‘This shows the demand for both market and affordable housing is high, and in excess of that which could be accommodated or delivered within Wealden.’ 24. This appears to be the basis of the council’s approach to the Core Strategy as a matter of basic principle; that the level of housing proposed for the District is less than the figure of new dwellings required by reference to regional policy and less than that indicated to be required by all other relevant sources for the reason that the District has insufficient capacity to accommodate housing at the levels required. This is the sole extent to which the council attempts to justify the 9600 housing figure. 25. However, there is no adequate explanation anywhere in the Strategy as to why the projected increase in households cannot be accommodated in the District. Of even greater importance, the Strategy, having stated that insufficient dwellings to meet identified need will be allowed for, fails in any way to consider or try to quantify the potentially significant social, economic and housing problems that an acknowledged failure to meet projected future requirements will cause. AFFORDABLE HOUSING 26. It is notable in respect of the council’s failure to deal with these issues that in Background Paper 1 – Development of the
Proposed Submission Core Strategy (BP1) the council repeatedly concludes that high levels of housing are required within the District and acknowledges that this need is identified in a variety of demographic and statistical evidence. 27. The issue of affordable housing is raised within the Core Strategy in Background Papers 1 – Development of the Proposed Submission Core Strategy and 2 – Managing the Delivery of Housing. The council’s Housing Needs Assessment (January 2010) is referenced on page 17, paragraph 5.14 of BP1 which describes how the need for affordable housing cannot be accommodated within the District despite evidence showing a great need. This is again referenced within BP2 (page 3, paragraph 2.3) where the council’s Strategic Housing Market Assessment (SHMA) has also been referred to which addresses ‘very significant affordability issues’ within the District. BP2 (page 3, paragraph 2.3) also identifies Wealden as one of the highest house price areas in the country. 28. However, there is no correlation between the extent to which the failure to produce adequate levels of affordable housing that would result from the overall approach to Core Strategy housing provision would result in social deprivation and other long term problems for the population of the District. That is in our view be a fundamental deficiency of the Strategy. DEMOGRAPHICS 29. BP2 - Managing the Delivery of Housing (page 3, paragraph 2.4) - explains the demographic structure of population and households within the District. There are a number of trends which have been referred to, including a decrease in household size, resulting in more single person households, particularly the elderly. The demand for housing from demographic evidence, coupled with the economic prosperity considerations below, mean that the overall health of the District depends on a future growth in population. It is therefore the responsibility of the council to provide enough housing both of the correct type and in the correct location, in accordance with the nature of demand outlined above. ECONOMIC PROSPERITY 30. It is a requirement of PPS 4 Planning for Sustainable Economic Growth, that local authorities should include within their plans a clear economic vision for their areas which ‘positively and proactively encourages sustainable economic growth’ (page 7, EC2.1 (a)). 31. Due to the need to maintain an economically active and consumer based population in line with PPS 4, in-migration is encouraged by the council. BP2, page 3, paragraph 2.4 states: ‘In order to maintain the viability of services and facilities and the vitality of the local economy there is therefore a requirement for significant new housing development within the District which would encourage some in-migration in order to maintain population levels’. 32. In addition, ONS figures for 2007 indicate a net inward migration from within the UK to Wealden of 800 people (arising from 7,800 leaving the District and 8,600 entering), which demonstrates in-migration is occurring and adds to the demand for housing within the District. 33. It is noted within BP2, page 3, paragraph 2.4: - "This natural change, leading to a declining and more elderly population, could have a potentially very damaging effect on the future customer base on existing services and facilities within the District as well as for the viability and vitality of Wealden’s town centres by reducing the economically active sector." 34. This effectively acknowledges that on economic grounds an increase in the population that would be the result of a higher level of housing growth is required to enable the District to maintain and improve its economic base and to facilitate protection of existing employment levels and facilitate employment growth. 35. None of these considerations relating to housing and economic need are evident within the housing figures which the Core Strategy proposes overall. The low figure of 9600 is not adequately justified within any of these documents, despite evidence to show that higher levels of housing are needed and would be beneficial to the future growth of Wealden, particularly to maintain the vitality of town centres and support economic growth. CONSTRAINTS WITHIN WEALDEN 36. The Core Strategy and BP1 identify constraints within the District which is considered to restrict housing growth in certain areas. These are outlined on page 23 of BP1, paragraph 6.2 and include the issues of waste water treatment capacity in the south of the District and the need to protect the rural nature of the District and the High Weald AONB. Also included within constraints for Uckfield, Polegate and Hailsham in the Core Strategy are traffic management and congestion problems in the town centres with significant infrastructure improvements required. 37. However this must be contrasted against the above evidence where ONS figures show a demand for housing given the projected increase in population, the overwhelming need for affordable housing and the need for in-migration to tackle population needs of the Wealden District and support economic prosperity. This goes to the heart of the need for the Core Strategy, which should seek to plan positively for appropriate growth in balance with the acknowledgement of constraints, rather than reducing growth rates arbitrarily. 38. Although these constraints and needs have been referred to within the documents relating to the Core Strategy, there is no statistical analysis to ascertain how the 9600 housing figure has been decided. There is also no explanation as to why the figures have been decreased from the South East Plan allocation, which for the Core Strategy plan period would be 13,200, or as to why the proposed allocation fails to meet household projections to an even greater extent. It is our case that the need for housing has not been appropriately analysed and a figure of 9600 does not address the evidence, which clearly shows the requirement for housing. 39. This conclusion merely concurs with that which has been reached repeatedly through BP1, and in particular on page 21, paragraph 5.37, which supports the above points in relation to a significant need for housing growth. The discussion which follows on the constraints to development does not attempt to expand on the nature of these problems and by how much they would limit new housing development. Therefore without robust statistical analysis and an unclear analysis of ONS projections it not possible to ascertain how the housing figure of 9600 has been established. As it has been used as the overall basis of the Core Strategy, this is a fundamental fault in the research and analysis of the evidence base of the document which results in a need to overhaul housing figures basing them on real evidence of need. FORWARD PLANNING 40. Based on the discussion and evidence referenced above, it is considered that 9600 is not an appropriately justified housing figure for the District. The figure fails to take into account the need for future growth in the District and does not propose effective forward
planning which is the main purpose of Core Strategies. The only justification for providing this figure seems to be based on past housing figures. This is contained within the Core Strategy on page 29, paragraph 5.13 which explains how over the last 21 years an average of 400 dwellings have been built per annum in the District and that based on this, a similar rate is achievable in the future. This does not provide for effective forward planning as evidence is based on past results rather than remaining focused on future growth. It is evident from the projected population figures that population is expected to increase and if Wealden are unable to accommodate this growth, it will force people to reside outside of the District. This increases pressure on neighbouring authorities who suffer their own constraints and it is the responsibility of Wealden District Council to address this growth properly.

PROPOSED REVISED HOUSING FIGURES

The South East Plan allocated 11,000 dwellings to the District based on national housing figures and fair distribution across the region taking into account policy considerations of each District and national housing need. The DCLG policy based population and housing projections are run under the same assumptions of the trend based projections in terms of fertility, mortality and migration level, but additionally they take into account the number of houses planned to be built during the projection period. The migration level is then adjusted according to the future housing provision. This information has been obtained in response to a specific enquiry from East Sussex County Council, correspondence of which has been attached as Appendix 1. 44. On this basis it is considered that the policy based projections fairly assess population growth and the requirements of the District. It is therefore proposed that in order to accommodate the requirement for more housing based on the evidence addressed above, it is fundamental to work towards a figure of 13,000 as proposed both by the South East Plan and justified by policy based household projections. If this position is not concurred with then the 11,000 figure allocated within the South East Plan must be taken as an absolute minimum. This will then adequately accommodate for projected population growth, in-migration and economic prosperity. It will also accommodate for changing demographics of smaller households and an increase in housing will greatly help to address the apparent affordability problems in the District. It will encourage a greater choice of types and tenures of housing and subject to national requirements, affordable housing can be promoted through larger housing development schemes. DISTRIBUTION OF HOUSING 46. This section of the representations discusses the distribution of housing, primarily between the north and south of the District but also in terms of the manner of the council’s treatment of the settlement hierarchy. The first notable point is many of the significant potential infrastructure constraints, such as waste water treatment capacity and inadequate road infrastructure, are focused on the south of the District. This is where a large majority of the housing has been allocated. The Strategy acknowledges that further development here would be limited due to these constraints, but the overall approach to dealing with levels of development in the south in the South East Plan is acknowledged. It is accepted that the council’s approach to development in these areas is acceptable in principle, although there are one or two instances where we consider that the degree of emphasis on development in the south has resulted in proposed locations for housing that are inappropriate. 47. The discussion earlier in this document highlights the very significant and acknowledged need for a more substantial housing figure in the District. Given that the general approach to housing provision and location in the south is acceptable consideration therefore needs to be given in the Strategy to additional provision in the north of the District at an appropriate scale and in locations that reflect the need to consider the appropriateness of the settlement hierarchy. RURAL AREAS STRATEGY - WADHURST

We support the council’s strategy that development should be included within key villages to encourage the sustainable development and even distribution of housing within smaller settlements. This is in general accordance with the need to provide additional housing provision in the north of the District to meet housing need. Development within the villages in the District will encourage a diversity of housing mix, address affordability problems and present a good distribution of housing across the District. For example, the Core Strategy Policy WCS6 Rural Areas Strategy allocates Wadhurst 70 net additional dwellings over the plan period. A suitable site at Old Station Road has been recognised by the SHLAA as a suitable site for development for a capacity of 35 new dwellings. This site can accommodate some of the allocated dwellings to Wadhurst in a suitable, available and achievable location. A plan of the land is attached as Appendix 2. GENERAL SUMMARY 51. It follows from the general arguments set out above that we consider that the overall position of the proposed Core Strategy is such that it has not been demonstrated to any satisfactory degree that it represents a reasonable approach to meeting the district’s housing requirement, particularly in the north of the District. The inclusion within the Core Strategy of housing figures that are below those of the South East Plan and below those in ONS projections is not justified or, importantly, explained in any meaningful way in the document, and in the absence of such adequate explanation it can only be concluded that the Strategy is unsound and will fail to provide an adequate future policy base. The housing figures allocated within the Core Strategy are not sufficient to accommodate adequate growth in the District and would result in the plan failing the tests of soundness. The 9600 housing figure has not been derived from robust statistical analysis and instead relies upon past annual housing figures. The Core Strategy overall housing figures therefore fail to accommodate for future growth and effective forward planning. It is considered that there is a need to allocate 13,000 dwellings over the plan period 2006-2030 to adequately address the issues relating to policy based population growth and housing requirements. Moreover, here are a number of suitable locations within the District available for housing development which do not compromise the constraints highlighted within the Core Strategy. The failure of the Core Strategy to make provision in this way means that additional housing allocations are necessary in order to meet likely future requirements. The balance of the
Strategy is significantly weighted towards the south of the District and although the overall approach to housing and economic development, and the balance with necessary associated infrastructure provision, in the south is justified in the Strategy the failure of the Strategy to provide appropriately for development in the north of the District is wrong. 56. That development should include provision of housing in Key Settlements and greater emphasis on such development should be given in view of the shortfall of provision in the Core Strategy. 57. In order for the council to focus on effective forward planning, it must appropriately consider the identified housing requirement and sustainable distribution of housing development which should be based on statistical analysis and balanced policy considerations. This will encourage economic prosperity, encourage a greater choice of housing which will help to tackle affordability issues and ensure the continued vitality of the District without compromising the rural nature of the District.

Details of Changes to be Made:
Our representations make reference to the changes we consider necessary to the Strategy
INTRODUCTION 1. The comments in this document are made on behalf of the Clay family and focus on a number of issues raised by the 2011 Core Strategy Proposed Submission Document. Initially the representations address how the housing figures have been derived, the distribution of housing in the District and the uneven balance of strategic development, which is primarily focused in the south of the District. 2. In light of those comments we then consider amendments and additions to the document that should be made to ensure that it makes proper provision for the future planning of the District. In these representations the overall point that we wish to make on behalf of our client is that there should be amendments to the Strategy to focus more development in the north of the District and that, as the largest town, such development should be centred on Crowborough. Suggestions are made as to how and where such development could be accommodated. 3. We deal first with the context of the Core Strategy and the level of housing development it proposes, in light of a significant failure to justify or explain the levels of development proposed. REGIONAL STRATEGIES 4. PPS 12 provides the guidance for the formation of Core Strategies and the legal requirements in order for an Inspector to declare the plan ‘sound’. Paragraph 4.50 sets out the checks an Inspector must make on the plan in order to fully comply with legislation. These include having regard to national policy and generally conforming to the Regional Spatial Strategy. Paragraph 4.33 in PPS 12 further illustrates this point and seeks to ensure Core Strategies are ‘consistent with national policy and in general conformity with the regional spatial strategy’. 5. The South East Plan allocated 11,000 dwellings to the Wealden District over the 20 year plan period 2006-2026, at a rate of 550 dwellings per annum, whereas the Proposed Submission Core Strategy allocates just 9600 over the 24 year period 2006-2030, an annual rate of 400 dwellings. The differences between the annual rate of dwellings and the plan periods are important to consider here, and this can be done in two ways: - a. The South East Plan period is 2006 - 2026. The Core Strategy plan period is 2006 – 2030; four years longer. The South East Plan requires 11,000 dwellings to be built during that period at a rate of 550 dwellings per annum. The Core Strategy would require just 8000 dwellings to be built between 2006 and 2026 at a rate of 400 dwellings per annum as proposed. This is a deficit of 3000 dwellings between the Core Strategy and the regional requirement. b. Conversely, if the South East Plan annual rate of 550 was applied to the Core Strategy plan period of 2006 – 2030 (24 years), this would amount to a need for 13,200 dwellings over the period 2006 - 2030. The Core Strategy requires only 9600 dwellings over this period, resulting in a deficit of 3600 dwellings. 6. The calculations show a clear deficit in housing provision in the Core Strategy when both annual rates and plan periods are accurately compared. 7. There has been significant debate surrounding the revocation of Regional Strategies and the latest High Court Order has confirmed that the intended abolition of the Regional Strategies by the Coalition Government can now be considered ‘material’ in future planning decisions. However, as the Cala Homes (South) Ltd v Secretary of State for Communities and Local Government and Winchester City Council [2011] EWHC 97 Judgement states, there are distinctions to be made between materiality and weight (paragraph 29). Therefore although this is a material consideration, it is the responsibility of the decision maker to defend their decision if there is any deviation from the guidance contained within the Regional Strategies. ‘Thus, in appropriate circumstances, a local planning authority in the reasonable exercise of its discretion may give no significant weight or even no weight at all to a consideration material to its decision, provided that it has had regard to it’ [our emphasis] (paragraph 30). The point here is quite clear; if the council wishes to deviate from the South East Plan it may do so, but only if there is clear and reasoned explanation given in the Core Strategy document that adequately justifies the approach taken. A failure to properly consider this issue will result in the Core Strategy being deemed unsound. 8. It is also essential in this context to have regard to paragraph 34 of PPS 3, which states ‘Regional Spatial Strategies should set out the level of overall housing provision for the region, broadly illustrated in a housing delivery trajectory, for a sufficient period to enable Local Planning Authorities to plan for housing over a period of at least 15 years.’ 9. The failure of the council to properly consider the appropriate level of housing provision and in addition to fail to properly explain and justify the reasons for the overall levels of growth that are promulgated is a significant deficiency in the Strategy and there is a need to consider substantial amendments to ensure the lack of soundness in this respect is overcome. POPULATION AND HOUSEHOLD PROJECTIONS 10. We have identified above the overarching issues in respect of the Strategy, relating to inadequacy of the Council’s’s housing figure of 9600 over the plan period of 2006-2030 and the failure to adequately justify why that figure should be accepted. In order to properly assess the soundness of the proposed Strategy it is also necessary to discuss actual housing need in relation to demographics and statistical information. 11. As we have already made plain, if the Core Strategy does not accord with figures in the South East Plan, the justification for the level of housing provision it proposes should
be explained elsewhere. We have therefore examined the document to seek to establish whether such an explanation exists. 12. The only reference to statistical evidence within the Core Strategy is contained on page 13 under paragraph 3.10 which states: ‘Trend based projections(1) show an increase in population in Wealden from 2006 to 2030 of around 19,000 persons, which equates to around 16,800 households.’ 13. This is accompanied by a footnote which offers a reference to Office of National Statistics (ONS) trend based projections in addition to different figures from East Sussex County Council. These contain a reference to a population increase of around 20,000 persons equating to 13,500 households and 13,000 additional dwellings. Both this comment and the direct reference in paragraph 3.10 indicate the need for a level of future housing that is considerably in excess of the council’s figure. 14. Background Paper 1 – Development of the Proposed Submission Core Strategy (BP1) also references ONS trend based population and housing projections on page 16, paragraph 5.11. This gives similar figures to those which are contained within the Core Strategy of a population increase of 19,200 persons equating to a need for an extra 16,800 households over the period 2006-2030. 15. We have also considered the ‘East Sussex in Figures’ website, which includes both trend based and policy based population and household projections for the different 25 year time periods. We have prepared the table below to highlight the comparison between the trend and policy based figures: - Trend Based Policy based Population projections Population projections 2008 2033 Increase 2001 2026 Increase 143,400 165,400 22,000 140,184 157,935 17,751 Households Household projections 2008 2033 Increase 2001 2026 Increase 61,290 77,684 16,394 58,466 71,356 12,890 The above figures have been sourced from www.eastsussexinfignures.org.uk 16. The important issue here is that it is unclear from the Core Strategy documents exactly which figures have been used, and it remains unclear despite our direct enquiries of the council on the matter. It seems likely, however, that trend based population and household projections have been obtained from this dataset. It may be the case that the figures above have been updated and that the council’s figures take into account previous figures available from 2006. These may then have been adjusted to fit in to the plan period of 2006-2030. 17. The trend based 2008 population projections were published by the Office for National Statistics (ONS) in May 2010 and the trend based housing projections are based on these figures but contain new household type categories recently developed by the Department of Communities and Local Government. 18. The trend based figures shown above are similar to the figures referenced in the Core Strategy, taking into account the adjustment of dates. However the footnote on page 13 refers to 13,000 additional dwellings, which is below any trend based figures previously referenced. It appears therefore that this may relate to the policy based figures, which are similar to the policy based household projection shown above (12,890), although there is some variation as the footnote references 2006-2031 and the above figures relate to 2001-2026. 19. The policy based figures shown above are described on the East Sussex in Figures website as being derived from housing provision figures provided within the South East Plan, housing trajectory work provided by the relevant council’s in September 2009, and they are modelled on the Chelmer Model. This is mentioned on page 16 of BP1 in paragraph 5.12 where it is noted that: ‘Due to the complexity of the model, the information used to predict future demand can not be examined in any great detail.’ 20. This is insufficient as the basis for the projections for future growth within the Core Strategy relies on these figures and it is the purpose of Background Papers to adequately explain these findings. This is especially the case as the council’s figures have been inadequately referenced and deviate considerably from all other relevant sources. 21. It is noted that although the footnote on page 13 of the Core Strategy is not properly referenced and there is no background information relating to how this information has been derived, the number of households (13,500) is more than the number of additional dwellings required (13,000). It is assumed that the extra 500 homes have been accommodated for through the council’s own information regarding long term empty dwellings in the District, short term empty dwellings due to an occupant’s death or houses currently being sold on the market. However it is considered that this slight drop in the number of households compared to the number of dwellings required is not greatly significant to argue for less housing need. Furthermore these figures have not been adequately referenced or justified and the calculations used to reach these figures are unavailable. HOUSING REQUIREMENT 22. It is predominantly trend based population and household projections which have been referenced within the Core Strategy where it is then explained on page 13, paragraph 3.10 that: ‘This shows the demand for both market and affordable housing is high, and in excess of that which could be accommodated or delivered within Wealden.’ 23. This appears to be the basis of the council’s approach to the Core Strategy as a matter of basic principle; that the level of housing proposed for the District is less than the figure of new dwellings required by reference to regional policy and less than that indicated to be required by all other relevant sources for the reason that the District has insufficient capacity to accommodate housing at the levels required. This is the sole extent to which the council attempts to rationalise the 9600 housing figure. 24. However, there is no adequate explanation anywhere in the Strategy as to why the projected increase in households cannot be accommodated in the District. Of even greater importance, the Strategy, having stated that insufficient dwellings to meet identified need will be allowed for, fails in any way to consider or try to quantify the potentially significant social, economic and housing problems that an acknowledged failure to meet projected future requirements will cause. AFFORDABLE HOUSING 25. It is notable in respect of the council’s failure to deal with these issues that in Background Paper 1 – Development of the Proposed Submission Core Strategy (BP1) the council repeatedly concludes that high levels of housing are required within the District and acknowledges that this need is identified in a variety of demographic and statistical evidence. 26. The issue of affordable housing is raised within the Core Strategy in Background Papers 1 – Development of the Proposed Submission Core Strategy and 2 – Managing the Delivery of Housing. The council’s Housing Needs Assessment (January 2010) is referenced on page 17, paragraph 5.14 of BP1 which describes
how the need for affordable housing cannot be accommodated within the District despite evidence showing a great need. This is again referenced within BP2 (page 3, paragraph 2.3) where the council’s Strategic Housing Market Assessment (SHMA) has also been referred to which addresses ‘very significant affordability issues’ within the District. BP2 (page 3, paragraph 2.3) also identifies Wealden as one of the highest house price areas in the country. 27. However, there is no correlation between the extent to which the failure to produce adequate levels of affordable housing that would result from the overall approach to Core Strategy housing provision would result in social deprivation and other long term problems for the population of the District. That is in our view a fundamental deficiency of the Strategy. DEMOGRAPHICS 28. BP2 - Managing the Delivery of Housing (page 3, paragraph 2.4) - explains the demographic structure of population and households within the District. There are a number of trends which have been referred to, including a decrease in household size, resulting in more single person households, particularly the elderly. The demand for housing from demographic evidence, coupled with the economic prosperity considerations below, mean that the overall health of the District depends on a future growth in population. It is therefore the responsibility of the council to provide enough housing both of the correct type and in the correct location, in accordance with the nature of demand outlined above. ECONOMIC PROSPERITY 29. It is a requirement of PPS 4 Planning for Sustainable Economic Growth, that local authorities should include within their plans a clear economic vision for their areas which ‘positively and proactively encourages sustainable economic growth’ (page 7, EC2.1 (a)). 30. Due to the need to maintain an economically active and consumer based population in line with PPS 4, in-migration is encouraged by the council. BP2, page 3, paragraph 2.4 states:- ‘In order to maintain the viability of services and facilities and the vitality of the local economy there is therefore a requirement for significant new housing development within the District which would encourage some in-migration in order to maintain population levels’. 31. In addition, ONS figures for 2007 indicate a net inward migration from within the UK to Wealden of 800 people (arising from 7,800 leaving the District and 8,600 entering), which demonstrates in-migration is occurring and adds to the demand for housing within the District. 32. It is noted within BP2, page 3, paragraph 2.4: - 'This natural change, leading to a declining and more elderly population, could have a potentially very damaging effect on the future customer base on existing services and facilities within the District as well as for the viability and vitality of Wealden’s town centres by reducing the economically active sector.’ 33. This effectively acknowledges that on economic grounds an increase in the population that would be the result of a higher level of housing growth is required to enable the District to maintain and improve its economic base and to facilitate protection of existing employment levels and facilitate employment growth. 34. None of these considerations relating to housing and economic need are evident within the housing figures which the Core Strategy proposes overall. The low figure of 9600 is not adequately justified within any of these documents, despite evidence to show that higher levels of housing are needed and would be beneficial to the future growth of Wealden, particularly to maintain the vitality of town centres and support economic growth. CONSTRAINTS WITHIN WEALDEN 35. The Core Strategy and BP1 identify constraints within the District which is considered to restrict housing growth in certain areas. These are outlined on page 23 of BP1, paragraph 6.2 and include the issues of waste water treatment capacity in the south of the District and the need to protect the rural nature of the District and the High Weald AONB. Also included within constraints for Uckfield, Polegate and Hailsham in the Core Strategy are traffic management and congestion problems in the town centres with significant infrastructure improvements required. 36. However this must be contrasted against the above evidence where ONS figures show a demand for housing given the projected increase in population, the overwhelming need for affordable housing and the need for in-migration to tackle population needs of the Wealden District and support economic prosperity. This goes to the heart of the need for the Core Strategy, which should seek to plan positively for appropriate growth in balance with the acknowledgement of constraints, rather than reducing growth rates arbitrarily. 37. Although these constraints and needs have been referred to within the documents relating to the Core Strategy, there is no statistical analysis to ascertain how the 9600 housing figure has been decided. There is also no explanation as to why the figures have been decreased from the South East Plan allocation, which for the Core Strategy plan period would be 13,200, or as to why the proposed allocation fails to meet household projections to an even greater extent. It is our case that the need for housing has not been appropriately analysed and a figure of 9600 does not address the evidence, which clearly shows the requirement for housing. 38. This conclusion merely concurs with that which has been reached repeatedly through BP1, and in particular on page 21, paragraph 5.37, which supports the above points in relation to a significant need for housing growth. The discussion which follows on the constraints to development does not attempt to expand on the nature of these problems and by how much they would limit new housing development. Therefore without robust statistical analysis and an unclear analysis of ONS projections it not possible to ascertain how the housing figure of 9600 has been established. As it has been used as the overall basis of the Core Strategy, this is a fundamental fault in the research and analysis of the evidence base of the document which results in a need to overhaul housing figures basing them on real evidence of need. FORWARD PLANNING 39. Based on the discussion and evidence referenced above, it is considered that 9600 is not an appropriately justified housing figure for the District. The figure fails to take into account the need for future growth in the District and does not propose effective forward planning which is the main purpose of Core Strategies. 40. The only justification for providing this figure seems to be based on past housing figures. This is contained within the Core Strategy on page 29, paragraph 5.13 which explains how over the last 21 years an average of 400 dwellings have been built per annum in Wealden and that based on this, a similar rate is achievable in the future. 41. This does not provide for effective forward planning as evidence is based on past results rather than remaining focused on future growth. It is evident from the projected
population figures that population is expected to increase and if Wealden are unable to accommodate this growth, it will force people to reside outside of the District. This increases pressure on neighbouring authorities who suffer their own constraints and it is the responsibility of Wealden District Council to address this growth properly.

**PROPOSED REVISED HOUSING FIGURES**

The South East Plan allocated 11,000 dwellings to the District based on national housing figures and fair distribution across the region taking into account policy considerations of each District and national housing need. The DCLG policy based population and housing projections are run under the same assumptions of the trend based projections in terms of fertility, mortality and migration level, but additionally they take into account the number of houses planned to be built during the projection period. The migration level is then adjusted according to the future housing provision. This information has been obtained in response to a specific enquiry from East Sussex County Council, correspondence of which has been attached as Appendix 1. 43. On this basis it is considered that the policy based projections fairly assess population growth and the requirements of the District. It is therefore proposed that in order to accommodate the requirement for more housing based on the evidence addressed above, it is fundamental to work towards a figure of 13,000 as proposed both by the South East Plan and justified by policy based household projections. If this position is not concurred with then the 11,000 figure allocated within the South East Plan must be taken as an absolute minimum. 44. This will then adequately accommodate for projected population growth, in-migration and economic prosperity. It will also accommodate for changing demographics of smaller households and an increase in housing will greatly help to address the apparent affordability problems in the District. It will encourage a greater choice of types and tenures of housing and subject to national requirements, affordable housing can be promoted through larger housing development schemes. **DISTRIBUTION OF HOUSING**

45. This section of the representations discusses the distribution of housing, primarily between the north and south of the District but also in terms of the manner of the council’s treatment of the settlement hierarchy. The first notable point is many of the significant potential infrastructure constraints, such as waste water treatment capacity and inadequate road infrastructure, are focused on the south of the District. This is where a large majority of the housing has been allocated. The Strategy acknowledges that further development here would be limited due to these constraints, but the overall approach to dealing with levels of development in the south in the South East Plan is acknowledged. It is accepted that the council’s approach to development in these areas is acceptable in principle, although there are one or two instances where we consider that the degree of emphasis on development in the south has resulted in proposed locations for housing that are inappropriate. 46. The discussion earlier in this document highlights the very significant and acknowledged need for a more substantial housing figure in the District. Given that the general approach to housing provision and location in the south is acceptable consideration therefore needs to be given in the Strategy to additional provision in the north of the District at an appropriate scale and in locations that reflect the need to consider the appropriateness of the settlement hierarchy. 47. Crowborough is the largest town in the District and is designated as a District Centre within the Core Strategy. Given its close proximity to Tunbridge Wells it is the most appropriate location to accommodate the requirement for more housing. This will help to achieve the aims of providing more development to support growth and improving retail and employment opportunities and the provision of affordable housing in the north of the District. 48. Presently, the majority of development within the north of the District is focused in a single urban extension to the west of Uckfield (SD1). Expansion of Uckfield in this manner is considered to be inappropriate due to issues including traffic congestion, capacity, flood risk, noise from the A22 and the sites prominence in the wider landscape and the very exposed views from the Uckfield bypass. These issues have already been highlighted with the council’s Strategic Housing Land Availability Assessment (SHLAA). 49. This site would represent a major incursion into unspoilt countryside that will have a very seriously damaging effect on a wide area and will completely change the setting of the town and its relationship to the surrounding countryside. That is because of the prominence of the location and its poor relationship in a landscape sense to the town, from which it is almost entirely visually detached by virtue of the topography of the area and the openness of the location to the surrounding area. CROWBOROUGH 50. The proposed submission Strategy significantly detracts from the potential of Crowborough, which is better placed in the District in terms of accessibility and has excellent education and health facilities that are at least comparable with those of Uckfield. Crowborough is in need of town centre regeneration, although it has shown that even in present recessionary times the basic strength of the centre is apparent though increases in the retail offering in terms of quality and floorspace. New social infrastructure to support its population is being provided; work having commenced on the new community building in the centre of the town. 51. There is a perceived conflict between development at Crowborough and its environmental status as a result of the relationship of the town to the AONB that surrounds it and of the proximity of Ashdown Forest as a major recreational facility that is at the same time an important environmental asset as a result of its status as a SSSI. However, given that the Forest is a major regional attraction it is not considered that growth at Crowborough will make any real difference to the health and wellbeing of the Forest per se, when regional growth figures are such that the population will generally be increasing and it is inevitable that the attractiveness of the Forest will make it an increasingly used resource by the existing and increasing population over a wide area. The Core Strategy in any case rightly seeks to draw a zone within which development that would potentially affect the Forest would be prevented. 52. On the basis of the comments we have made earlier and in view of our conclusions above we consider that there is a significant opportunity for development at Crowborough that is justified as a result of the need to ensure that overall growth for the District is at a sustainable level that will meet future requirements in an acceptable fashion. A level of development that achieves that aim is the minimum that the strategy should be proposing. There are, however,
recognised constraints to the town and therefore a need to consider the most appropriate general location for development in terms of landscape impact and accessibility. We also consider that it would be appropriate for the council to consider a single major location for development on the basis that the necessary infrastructure to serve such a development can be provided more effectively and efficiently and that it will be easier to provide the funding for regeneration and community projects with a single development rather than from a number of smaller sites. 53. Crowborough has landscape and environmental constraints on much of its periphery and in addition the growth of the town in the past has been such that accessibility, particularly to the south, is very constrained. Southern areas of the town are far removed from the A26, which is required for access to the north and south, and by poor road infrastructure in the intervening areas that is incapable of improvement to an acceptable degree to support major development. This is reinforced within paragraph 6.36 of the submission document which identifies the existing traffic and congestion problems on the local road network. Despite the fact that the rail station is located to the south east and there are areas to the south east of the town that do not lie within the AONB it is not possible to identify a suitable location for development adjacent to the town that is suitable in a landscape and environmental capacity and with appropriate accessibility characteristics within close proximity of the station. Thus, although the Strategy seeks to accommodate a relatively large development area to the south of the town it is not considered that that could realistically be achieved in an acceptable way. While the fact that that area is not within the AONB might initially be seen to be a benefit there are significant access problems that effectively militate against all but relatively small levels of development in this location. 54. Land to the west and north west of the town is in close juxtaposition with Ashdown Forest and the AONB and has a rural and semi rural character that would be significantly disrupted by new development of any scale. Accessibility is also relatively poor and there would be some difficulty in integrating development with the need to protect the Forest and its environs. 55. Land to the north east of the town is within the High Weald AONB and is open in character, such that there are wide ranging long distance views of the southern slopes in this area from the Eridge Ridge to the north. The sensitivity of these areas is high in environmental terms as a result and the character and setting of the town in the landscape would be significantly affected by development in these areas. 56. To the east of the town are Palesgate and Crowborough Ghyll, largely wooded areas mostly owned by the Town Council and utilised for informal public open spaces that are protected by planning policies and which form an effective semi rural edge to the town as well as being on a high ridge that gives a significant degree of enclosure and containment to the south eastern parts of the town. 57. North of the town the land rises gently to a long sloping ridge that runs west-east between Steel Cross and Boars Head, with Palesgate Forest in the east and the more open landscape north of the town to the west that contains land suitable for development. Parcels exist in the area of Steel Cross Road that would be suitable for development including, for example, land to the south of Steel Cross Road which is not located within the High Weald AONB. The land is located close to the junction between A26 and B2157 which provides the site with good accessibility links and access to the local and regional road network. The site is located to the within an area of existing development and is bounded to the north, east and west by residential properties. Development of this site would therefore effectively represent infilling within an already built up area that has in the past been inappropriately excluded by the development boundary to Crowborough. Inclusion of the site would provide flexibility to the development that is recommended to be located to the north of the town and is considered an appropriate location for development and growth. A plan of the site is included in Appendix 2. 58. This is considered to be in contrast to the contingency site which is located to the north of the A26 within the AONB and is unconstrained. It is therefore considered that more suitable sites to the north of the town should be included within the strategy for the development of Crowborough. GENERAL SUMMARY 59. It follows from the general arguments set out above that we consider that the overall position of the proposed Core Strategy is such that it has not been demonstrated to any satisfactory degree that it represents a reasonable approach to meeting acknowledged housing demand. While the strategy appears satisfactory in dealing with the generalities of the amount of growth it provides for there is a significant failure to deliver sufficient housing to meet the actual likely future requirement, particularly in the north of the District. 60. The inclusion within the Core Strategy of housing figures that are below those of the South East Plan and below those in ONS projections is not justified or, importantly, explained in any meaningful way in the document, and in the absence of such adequate explanation it can only...

Details of Changes to be Made:
Our representations include comments on what changes to the Strategy are required
There has been significant debate surrounding the revocation of Regional Strategies and the latest High Court housing provision in the Core Strategy when both annual rates and plan periods are accurately compared. South East Plan annual rate of 550 was applied to the Core Strategy plan period of 2006 – 2030 (24 years), this would amount to a need for 13,200 dwellings over the period 2006 - 2030. The Core Strategy requires only 9600 dwellings over this period, resulting in a deficit of 3600 dwellings. The calculations show a clear deficit in the South East Plan allocated 11,000 dwellings to the Wealden District over the 20 year plan period 2006-2026, at a rate of 550 dwellings per annum. The Core Strategy would require just 8000 dwellings to be built between 2006 and 2026 at a rate of 400 dwellings per annum as proposed. This is a deficit of 3000 dwellings between the Core Strategy and the regional requirement. Conversely, if the Core Strategy plan period is 2006 - 2030; four years longer. The South East Plan requires 11,000 dwellings to be built during that period at a rate of 550 dwellings per annum. The Core Strategy would require 11,000 dwellings to be built during that period at a rate of 400 dwellings per annum as proposed. This is a deficit of 3000 dwellings between the Core Strategy and the regional requirement.

Regional Strategies 5. PPS 12 provides the guidance for the formation of Core Strategies and the legal requirements in order for an Inspector to declare the plan ‘sound’. Paragraph 4.50 sets out the checks an Inspector must make on the plan in order to fully comply with legislation. These include having regard to national policy and generally conforming to the Regional Spatial Strategy. Paragraph 4.33 in PPS 12 further illustrates this point and seeks to ensure Core Strategies are ‘consistent with national policy and in general conformity with the regional spatial strategy’. The South East Plan allocated 11,000 dwellings to the Wealden District over the 20 year plan period 2006-2026, at a rate of 550 dwellings per annum, whereas the Proposed Submission Core Strategy allocates just 9600 over the 24 year period 2006-2030, an annual rate of 400 dwellings. The differences between the annual rate of dwellings and the plan periods are important to consider here, and this can be done in two ways: a. The South East Plan period is 2006 - 2026. The Core Strategy plan period is 2006 – 2030; four years longer. The South East Plan requires 11,000 dwellings to be built during that period at a rate of 550 dwellings per annum. The Core Strategy would require just 8000 dwellings to be built between 2006 and 2026 at a rate of 400 dwellings per annum as proposed. This is a deficit of 3000 dwellings between the Core Strategy and the regional requirement. b. Conversely, if the South East Plan annual rate of 550 was applied to the Core Strategy plan period of 2006 – 2030 (24 years), this would amount to a need for 13,200 dwellings over the period 2006 - 2030. The Core Strategy requires only 9600 dwellings over this period, resulting in a deficit of 3600 dwellings. 7. The calculations show a clear deficit in housing provision in the Core Strategy when both annual rates and plan periods are accurately compared.

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the plan period of 2006-2030 and the failure to adequately justify why that figure should be accepted. In order to properly assess the soundness of the proposed Strategy it is also necessary to discuss actual housing need in relation to demographics and statistical information. 12. As we have already made plain, if the Core Strategy does not accord with figures in the South East Plan, the justification for the level of housing provision it proposes should be explained elsewhere. We have therefore examined the document to seek to establish whether such an explanation exists. 13. The only reference to statistical evidence within the Core Strategy is contained on page 13 under paragraph 3.10 which states: ‘Trend based projections(1) show an increase in population in Wealden from 2006 to 2030 of around 19,000 persons, which equates to around 16,800 households.’ 14. 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This is especially the case as the council’s figures have been inadequately referenced and deviate considerably from all other relevant sources. 22. It is noted that although the footnote on page 13 of the Core Strategy is not properly referenced and there is no background information relating to how this information has been derived, the number of households (13,500) is more than the number of additional dwellings required (13,000). It is assumed that the extra 500 homes have been accommodated for through the council’s own information regarding long term empty dwellings in the District, short term empty dwellings due to an occupant’s death or houses currently being sold on the market. However it is considered that this slight drop in the number of households compared to the number of dwellings required is not greatly significant to argue for less housing need. Furthermore these figures have not been adequately referenced or justified and the calculations used to reach these figures are unavailable. HOUSING REQUIREMENT 23. It is predominantly trend based population and household projections which have been referenced within the Core Strategy where it is then explained on page 13, paragraph 3.10 that: ‘This shows the demand for both market and affordable housing is high, and in excess of that which could be accommodated or delivered within Wealden.’ 24. This appears to be the basis of the council’s approach to the Core Strategy as a matter of basic principle; that the level of housing proposed for the District is less than the figure of new dwellings required by reference to regional policy and less than that indicated to be required by all other relevant sources for the reason that the District has insufficient capacity to accommodate housing at the levels required. This is the sole extent to which the council attempts to justify the 9600 housing figure. 25. However, there is no adequate explanation anywhere in the Strategy as to why the projected increase in households cannot be accommodated in the District. Of even greater importance, the Strategy, having stated that insufficient dwellings to meet identified need will be allowed for, fails in any way to consider or try to quantify the potentially significant social, economic and housing problems that an acknowledged failure to meet projected future requirements will cause. AFFORDABLE HOUSING 26. It is notable in respect of the council’s failure to deal with these issues that in Background Paper 1 – Development of the Proposed Submission Core Strategy (BP1) the council repeatedly concludes that high levels of housing are
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None of these considerations relating to housing and economic need are evident within the housing figures which the Core Strategy proposes overall. The low figure of 9600 is not adequately justified within any of these documents, despite evidence to show that higher levels of housing are needed and would be beneficial to the future growth of Wealden, particularly to maintain the vitality of town centres and support economic growth. CONSTRAINTS WITHIN WEALDEN 36. The Core Strategy and BP1 identify constraints within the District which is considered to restrict housing growth in certain areas. These are outlined on page 23 of BP1, paragraph 6.2 and include the issues of waste water treatment capacity in the south of the District and the need to protect the rural nature of the District and the High Weald AONB. Also included within constraints for Uckfield, Polegate and Hailsham in the Core Strategy are traffic management and congestion problems in the town centres with significant infrastructure improvements required. 37. However this must be contrasted against the above evidence where ONS figures show a demand for housing given the projected increase in population, the overwhelming need for affordable housing and the need for in-migration to tackle population needs of the Wealden District and support economic prosperity. This goes to the heart of the need for the Core Strategy, which should seek to plan positively for appropriate growth in balance with the acknowledgement of constraints, rather than reducing growth rates arbitrarily. 38. Although these constraints and needs have been referred to within the documents relating to the Core Strategy, there is no statistical analysis to ascertain how the 9600 housing figure has been decided. There is also no explanation as to why the figures have been decreased from the South East Plan allocation, which for the Core Strategy plan period would be 13,200, or as to why the proposed allocation fails to meet household projections to an even greater extent. It is our case that the need for housing has not been appropriately analysed and a figure of 9600 does not address the evidence, which clearly shows the requirement for housing. 39. This conclusion merely concurs with that which has been reached repeatedly through BP1, and in particular on page 21, paragraph 5.37, which supports the above points in relation to a significant need for housing growth. The discussion which follows on the constraints to development does not attempt to expand on the nature of these problems and by how much they would limit new housing development. Therefore without robust statistical analysis and an unclear analysis of ONS projections it not possible to ascertain how the housing figure of 9600 has been established. As it has been used as the overall basis of the Core Strategy, this is a fundamental fault in the research and analysis of the evidence base of the document which results in a need to overhaul housing figures basing them on real evidence of need. FORWARD PLANNING 40. Based on the discussion and evidence referenced above, it is considered that 9600 is not an appropriately justified housing figure for the District. The figure fails to take into account the need for future growth in the District and does not propose effective forward planning which is the main purpose of Core Strategies. 41. The only justification for providing this figure seems to
commenced on the new community building in the centre of the town. There is a perceived conflict between terms of quality and floorspace. New social infrastructure to support its population is being provided; work having existing and increasing population over a wide area. The Core Strategy in any case rightly seeks to draw a zone wellbeing of the Forest per se, when regional growth figures are such that the population will generally be increasing and it is inevitable that the attractiveness of the Forest will make it an increasingly used resource by the regional attraction it is not considered that growth at Crowborough will make any real difference to the health and topography of the area and the openness of the location to the surrounding area. CROWBOROUGH

The relationship in a landscape sense to the town, from which it is almost entirely visually detached by virtue of the that will have a very seriously damaging effect on a wide area and will completely change the setting of the town views from the Uckfield bypass. These issues have already been highlighted with the council's Strategic Housing capacity, flood risk, noise from the A22 and the site's prominence in the wider landscape and the very exposed Expansion of Uckfield in this manner is considered to be inappropriate due to issues including traffic congestion, with those of Uckfield. Crowborough is in need of town centre regeneration, although it has shown that even in present recessionary times the basic strength of the centre is apparent though increases in the retail offering in the opportunities and the provision of affordable housing in the north of the District. Given its close proximity to Tunbridge Wells it is the most appropriate location to accommodate the requirement for more housing. This will help to achieve the aims of providing more development to support growth and improving retail and employment

The Strategy acknowledges that further development here would be limited due to these constraints, but the overall approach to dealing with levels of development in the south in the South East Plan is acknowledged. It is accepted that the councils approach to development in these areas is acceptable in principle, although there are one or two instances where we consider that the degree of emphasis on development in the south has resulted in proposed locations for housing that are inappropriate. 47. The discussion earlier in this document highlights the very significant and acknowledged need for a more substantial housing figure in the District. Given that the general approach to housing provision and location in the south is acceptable consideration therefore needs to be given in the Strategy to additional provision in the north of the District at an appropriate scale and in locations that reflect the need to consider the appropriateness of the settlement hierarchy. 48. Crowborough is the largest town in the District and is designated as a District Centre within the Core Strategy. Given its close proximity to Tunbridge Wells it is the most appropriate location to accommodate the requirement for more housing. This will help to achieve the aims of providing more development to support growth and improving retail and employment
comments we have made earlier and in view of our conclusions above we consider that there is a significant opportunity for development at Crowborough that is justified as a result of the need to ensure that overall growth for the District is at a sustainable level that will meet future requirements in an acceptable fashion. A level of development that achieves that aim is the minimum that the strategy should be proposing. There are, however, recognised constraints to the town and therefore a need to consider the most appropriate general location for development in terms of landscape impact and accessibility. 54. Land to the west and north west of the town is in close juxtaposition with Ashdown Forest and the AONB and has a rural and semi rural character that would be significantly disrupted by new development of any scale. Accessibility is also relatively poor and there would be some difficulty in integrating development with the need to protect the Forest and its environs. 55. Land to the north east of the town is within the High Weald AONB and is open in character, such that there are wide ranging long distance views of the southern slopes in this area from the Eridge Ridge to the north. The sensitivity of these areas is high in environmental terms as a result and the character and setting of the town in the landscape would be significantly affected by development in these areas. 56. To the east of the town are Palesgate and Crowborough Ghyll, largely wooded areas mostly owned by the Town Council and utilised for informal public open spaces that are protected by planning policies and which form an effective semi rural edge to the town as well as being on a high ridge that gives a significant degree of enclosure and containment to the south eastern parts of the town. 57. North of the town the land rises gently to a long sloping ridge that runs west-east between Steel Cross and Boars Head, with Palesgate Forest in the east and the more open landscape north of the town to the west that contains land suitable for development. 58. The failure of the Strategy to make any meaningful provision of housing at Crowborough is wholly inappropriate given the status of the town and its superior sustainability and accessibility credentials, together with the need to ensure the improvement of local retail, employment and community facilities. While there are potential difficulties as a result of the relationship of the town to the AONB, the nature of the landscape in certain peripheral areas is such that development could be accommodated in a much more satisfactory landscape fashion than the proposal at Uckfield. 59. The allocations that are suggested at Crowborough are largely inappropriate, either in terms of scale (the southern extension) or location (the reserve site). As a result of the increased requirement for housing documented above it is considered that there should be a greater allocation of housing for Crowborough and that that allocation should primarily be on land to the north with smaller sites accommodated in the south, where accessibility is a serious constraint. 60. The relatively large development area to the south of Crowborough is not considered to be realistically achievable in an acceptable way and that there are problems that effectively militate against all but relatively small levels of development in this location. For instance, there is land adjacent to the Plough and Horses Pub that is considerably smaller than proposed large allocation that could accommodate around 20 dwellings. A plan of the land is attached as Appendix 2. GENERAL SUMMARY 61. It follows from the general arguments set out above that we consider that the overall position of the proposed Core Strategy is such that it has not been demonstrated to any satisfactory degree that it represents a reasonable approach to meeting acknowledged housing demand. While the strategy appears satisfactory in dealing with the generalities of the amount of growth it provides for there is a significant failure to deliver sufficient housing to meet the actual likely future requirement, particularly in the north of the District. 62. The inclusion within the Core Strategy of housing figures that are below those of the South East Plan and below those in ONS projections is not justified or, importantly, explained in any meaningful way in the document, and in the absence of such adequate explanation it can only be concluded that the Strategy is unsound and will fail to provide an adequate future policy base. 63. The housing figures allocated within the Core Strategy are not sufficient to accommodate adequate growth in the District and would result in the plan failing the tests of soundness. The 9600 housing figure has not been derived from robust statistical analysis and instead relies upon past annual housing figures. The Core Strategy overall housing figures therefore fail to accommodate for future growth and effective forward planning. 64. It is considered that there is a need to allocate 13,000 dwellings over the plan period 2006-2030 to adequately address the issues relating to policy based population growth and housing requirements. Moreover, here are a number of suitable locations within the District available for housing development which do not compromise the constraints highlighted within the Core Strategy. 65. The failure of the Core Strategy to make provision in this way means that additional housing allocations are necessary

**Details of Changes to be Made:**

Our comments include suggested changes to the Strategy
Summary of all Representations - Proposed Submission Core Strategy Regulation 27 - Report 11th July 2011

Representation ID
337

Person ID  Mr a  Colliver  Agent ID  Mr Stevens
521881  521853

Paragraph  5.1
Sound  ☑ No  ☑ Justified  ☐ Effective  ☑ Consistent with national policy
Legally Compliant  ☑ No

Details of Reasons for Soundess/ Legal Complaince:

INTRODUCTION  1. The comments in this document are made on behalf of Mr and Mrs Colliver and focus on a number of issues raised by the 2011 Core Strategy Proposed Submission Document. Initially the representations address how the housing figures have been derived, the distribution of housing in the District and the uneven balance of strategic development, which is primarily focused in the south of the District. 2. In light of those comments we then consider amendments and additions to the document that should be made to ensure that it makes proper provision for the future planning of the District. In these representations the overall point that we wish to make on behalf of our client is that there should be amendments to the Strategy to focus more development in the north of the District and that, as the largest town, such development should be centred on Crowborough. Suggestions are made as to how and where such development could be accommodated. 3. We deal first with the context of the Core Strategy and the level of housing development it proposes, in light of a significant failure to justify or explain the levels of development proposed. REGIONAL STRATEGIES  4. Paragraph 4.50 sets out the checks an Inspector must make on the plan in order to fully comply with legislation. These include having regard to national policy and generally conforming to the Regional Spatial Strategy. Paragraph 4.33 in PPS 12 further illustrates this point and seeks to ensure Core Strategies are ‘consistent with national policy and in general conformity with the regional spatial strategy’. 5. The South East Plan allocated 11,000 dwellings to the Wealden District over the 20 year plan period 2006-2026, at a rate of 550 dwellings per annum, whereas the Proposed Submission Core Strategy allocates just 9600 over the 24 year period 2006-2030, an annual rate of 400 dwellings. The differences between the annual rate of dwellings and the plan periods are important to consider here, and this can be done in two ways: - a. The South East Plan period is 2006 - 2026. The Core Strategy plan period is 2006 – 2030; four years longer. The South East Pan requires 11,000 dwellings to be built during that period at a rate of 550 dwellings per annum. The Core Strategy would require just 8000 dwellings to be built between 2006 and 2026 at a rate of 400 dwellings per annum as proposed. This is a deficit of 3000 dwellings between the Core Strategy and the regional requirement. b. Conversely, if the South East Plan annual rate of 550 was applied to the Core Strategy plan period of 2006 – 2030 (24 years), this would amount to a need for 13,200 dwellings over the period 2006 - 2030. The Core Strategy requires only 9600 dwellings over this period, resulting in a deficit of 3600 dwellings. 6. The calculations show a clear deficit in housing provision in the Core Strategy when both annual rates and plan periods are accurately compared. 7. There has been significant debate surrounding the revocation of Regional Strategies and the latest High Court Order has confirmed that the intended abolition of the Regional Strategies by the Coalition Government can now be considered ‘material’ in future planning decisions. However, as the Cala Homes (South) Ltd v Secretary of State for Communities and Local Government and Winchester City Council [2011] EWCH 97 Judgement states, there are distinctions to be made between materiality and weight (paragraph 29). Therefore although this is a material consideration, it is the responsibility of the decision maker to defend their decision if there is any deviation from the guidance contained within the Regional Strategies. ‘Thus, in appropriate circumstances, a local planning authority in the reasonable exercise of its discretion may give no significant weight or even no weight at all to a consideration material to its decision, provided that it has had regard to it’ [our emphasis] (paragraph 30). The point here is quite clear; if the council wishes to deviate from the South East Plan it may do so, but only if there is clear and reasoned explanation given in the Core Strategy document that adequately justifies the approach taken. A failure to properly consider this issue will result in the Core Strategy being deemed unsound. 8. It is also essential in this context to have regard to paragraph 34 of PPS 3, which states ‘Regional Spatial Strategies should set out the level of overall housing provision for the region, broadly illustrated in a housing delivery trajectory, for a sufficient period to enable Local Planning Authorities to plan for housing over a period of at least 15 years.’ 9. The failure of the council to properly consider the appropriate level of housing provision and in addition to fail to properly explain and justify the reasons for the overall levels of growth that are promulgated is a significant deficiency in the Strategy and there is a need to consider substantial amendments to ensure the lack of soundness in this respect is overcome. POPULATION AND HOUSEHOLD PROJECTIONS  10. We have identified above the overarching issues in respect of the Strategy, relating to inadequacy of the council’s housing figure of 9600 over the plan period of 2006-2030 and the failure to adequately justify why that figure should be accepted. In order to properly assess the soundness of the proposed Strategy it is also necessary to discuss actual housing need in relation to demographics and statistical information. 11. As we have already made plain, if the Core Strategy does not accord with figures in the South East Plan, the justification for the level of housing provision it proposes should
be explained elsewhere. We have therefore examined the document to seek to establish whether such an explanation exists. 12. The only reference to statistical evidence within the Core Strategy is contained on page 13 under paragraph 3.10 which states: ‘Trend based projections(1) show an increase in population in Wealden from 2006 to 2030 of around 19,000 persons, which equates to around 16,800 households.’ 13. This is accompanied by a footnote which offers a reference to Office of National Statistics (ONS) trend based projections in addition to different figures from East Sussex County council. These contain a reference to a population increase of around 20,000 persons equating to 13,500 households and 13,000 additional dwellings. Both this comment and the direct reference in paragraph 3.10 indicate the need for a level of future housing that is considerably in excess of the council’s figure. 14. Background Paper 1 – Development of the Proposed Submission Core Strategy (BP1) also references ONS trend based population and housing projections on page 16, paragraph 5.11. This gives similar figures to those which are contained within the Core Strategy of a population increase of 19,200 persons equating to a need for an extra 16,800 households over the period 2006-2030. 15. We have also considered the ‘East Sussex in Figures’ website, which includes both trend based and policy based population and household projections for the different 25 year time periods. We have prepared the table below to highlight the comparison between the trend and policy based figures: - Trend Based Policy based Population projections Population projections 2008 2033 Increase 2001 2026 Increase 143,400 165,400 22,000 140,184 157,935 7,751 Household projections Households projections 2008 2033 Increase 2001 2026 Increase 61,290 77,684 16,394 58,466 71,356 12,890 The above figures have been sourced from www.eastsussexinfigures.org.uk 16. The important issue here is that it is unclear from the Core Strategy documents exactly which figures have been used, and it remains unclear despite our direct enquires of the council on the matter. It seems likely, however, that trend based population and household projections have been obtained from this dataset. It may be the case that the figures above have been updated and that the council’s figures take into account previous figures available from 2006. 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be based on past housing figures. This is contained within the Core Strategy on page 29, paragraph 5.13 which
explains how over the last 21 years an average of 400 dwellings have been built per annum in the District and that
based on this, a similar rate is achievable in the future. 41. This does not provide for effective forward planning as
evidence is based on past results rather than remaining focused on future growth. It is evident from the projected
population figures that population is expected to increase and if Wealden are unable to accommodate this growth, it will force people to reside outside of the District. This increases pressure on neighbouring authorities who suffer their own constraints and it is the responsibility of Wealden District Council to address this growth properly.

PROPOSED REVISED HOUSING FIGURES 42. The South East Plan allocated 11,000 dwellings to the District based on national housing figures and fair distribution across the region taking into account policy considerations of each District and national housing need. The DCLG policy based population and housing projections are run under the same assumptions of the trend based projections in terms of fertility, mortality and migration level, but additionally they take into account the number of houses planned to be built during the projection period. The migration level is then adjusted according to the future housing provision. This information has been obtained in response to a specific enquiry from East Sussex County Council, correspondence of which has been attached as Appendix 1. 43. On this basis it is considered that the policy based projections fairly assess population growth and the requirements of the District. It is therefore proposed that in order to accommodate the requirement for more housing based on the evidence addressed above, it is fundamental to work towards a figure of 13,000 as proposed both by the South East Plan and justified by policy based household projections. If this position is not concurred with then the 11,000 figure allocated within the South East Plan must be taken as an absolute minimum. 44. This will then adequately accommodate for projected population growth, in-migration and economic prosperity. It will also accommodate for changing demographics of smaller households and an increase in housing will greatly help to address the apparent affordability problems in Wealden. It will encourage a greater choice of types and tenures of housing and subject to national requirements, affordable housing can be promoted through larger housing development schemes.

DISTRIBUTION OF HOUSING 45. This section of the representations discusses the distribution of housing, primarily between the north and south of the District but also in terms of the manner of the council’s treatment of the settlement hierarchy. The first notable point is many of the significant potential infrastructure constraints, such as waste water treatment capacity and inadequate road infrastructure, are focused on the south of the District. This is where a large majority of the housing has been allocated. The Strategy acknowledges that further development here would be limited due to these constraints, but the overall approach to dealing with levels of development in the south in the South East Plan is acknowledged. It is accepted that the councils approach to development in these areas is acceptable in principle, although there are one or two instances where we consider that the degree of emphasis on development in the south has resulted in proposed locations for housing that are inappropriate. 46. The discussion earlier in this document highlights the very significant and acknowledged need for a more substantial housing figure in the District. Given that the general approach to housing provision and location in the south is acceptable consideration therefore needs to be given in the Strategy to additional provision in the north of the District at an appropriate scale and in locations that reflect the need to consider the appropriateness of the settlement hierarchy. 47. Crowborough is the largest town in the District and is designated as a District Centre within the Core Strategy. Given its close proximity to Tunbridge Wells it is the most appropriate location to accommodate the requirement for more housing. This will help to achieve the aims of providing more development to support growth and improving retail and employment opportunities and the provision of affordable housing in the north of the District. 48. Presently, the majority of development within the north of the District is focused in a single urban extension to the west of Uckfield (SD1). Expansion of Uckfield in this manner is considered to be inappropriate due to issues including traffic congestion, capacity, flood risk, noise from the A22 and the sites prominence in the wider landscape and the very exposed views from the Uckfield bypass. These issues have already been highlighted with the council’s Strategic Housing Land Availability Assessment (SHLLAA). 49. This site would represent a major incursion into unspoilt countryside that will have a very seriously damaging effect on a wide area and will completely change the setting of the town and its relationship to the surrounding countryside. That is because of the prominence of the location and its poor relationship in a landscape sense to the town, from which it is almost entirely visually detached by virtue of the topography of the area and the openness of the location to the surrounding area. CROWBOROUGH 50. The proposed submission strategy significantly detracts from the potential of Crowborough, which is better placed in the District in terms of accessibility and has excellent education and health facilities that are at least comparable with those of Uckfield. Crowborough is in need of town centre regeneration, although it has shown that even in present recessionary times the basic strength of the centre is apparent though increases in the retail offering in terms of quality and floorspace. New social infrastructure to support its population is being provided; work having commenced on the new community building in the centre of the town. 51. There is a perceived conflict between development at Crowborough and its environmental status as a result of the relationship of the town to the AONB that surrounds it and of the proximity of Ashdown Forest as a major recreational facility that is at the same time an important environmental asset as a result of its status as a SSSI. However, given that the Forest is a major regional attraction it is not considered that growth at Crowborough will make any real difference to the health and wellbeing of the Forest per se, when regional growth figures are such that the population will generally be increasing and it is inevitable that the attractiveness of the Forest will make it an increasingly used resource by the existing and increasing population over a wide area. The Core Strategy in any case rightly seeks to draw a zone within which development that would potentially affect the Forest would be prevented. 52. On the basis of the comments we have made earlier and in view of our conclusions above we consider that there is a significant opportunity for development at Crowborough that is justified as a result of the need to ensure that overall growth for the District is at a sustainable level that will meet future requirements in an acceptable fashion. A level of development that achieves that aim is the minimum that the strategy should be proposing. There are, however,
recognised constraints to the town and therefore a need to consider the most appropriate general location for
development in terms of landscape impact and accessibility. We also consider that it would be appropriate for the
council to consider a single major location for development on the basis that the necessary infrastructure to serve
such a development can be provided more effectively and efficiently and that it will be easier to provide the funding
for regeneration and community projects with a single development rather than from a number of smaller sites. 53.
Crowborough has landscape and environmental constraints on much of its periphery and in addition the growth of
the town in the past has been such that accessibility, particularly to the south, is very constrained. Southern areas
of the town are far removed from the A26, which is required for access to the north and south, and by poor road
infrastructure in the intervening areas that is incapable of improvement to an acceptable degree to support major
development. This is reinforced within paragraph 6.36 of the submission document which identifies the existing
traffic and congestion problems on the local road network. Despite the fact that the rail station is located to the
south east and there are areas to the south east of the town that do not lie within the AONB it is not possible to
identify a suitable location for development adjacent to the town that is suitable in a landscape and environmental
capacity and with appropriate accessibility characteristics within close proximity of the station. Thus, although the
Strategy seeks to accommodate a relatively large development area to the south of the town it is not considered
that that could realistically be achieved in an acceptable way. While the fact that that area is not within the AONB
might initially be seen to be a benefit there are significant access problems that effectively militate against all but
relatively small levels of development in this location. 54. Land to the west and north west of the town is in close
juxtaposition with Ashdown Forest and the AONB and has a rural and semi rural character that would be
significantly disrupted by new development of any scale. Accessibility is also relatively poor and there would be
some difficulty in integrating development with the need to protect the Forest and its environs. 55. Land to the
north east of the town is within the High Weald AONB and is open in character, such that there are wide ranging
long distance views of the southern slopes in this area from the Eridge Ridge to the north. The sensitivity of these
areas is high in environmental terms as a result and the character and setting of the town in the landscape would
be significantly affected by development in these areas. 56. To the east of the town are Palesgate and
Crowborough Ghyll, largely wooded areas mostly owned by the Town Council and utilised for informal public open
spaces that are protected by planning policies and which form an effective semi rural edge to the town as well as
being on a high ridge that gives a significant degree of enclosure and containment to the south eastern parts of the
town. 57. North of the town the land rises gently to a long sloping ridge that runs west-east between Steel Cross
and Boars Head, with Palesgate Forest in the east and the more open landscape north of the town to the west that
contains land suitable for development. Parcels exist in the area of Steel Cross Road that would be suitable for
development including, for example, land which is located between the A26 and B2157 and therefore has good
accessibility links and access to the local and regional road network. It is also located adjacent to existing
development and would therefore represent a clear extension to Crowborough. It would also allow for the
remainder of the land located within and bounded by the A26 and B2157 to be accessed and developed which
provides further flexibility within a clearly bounded site that would allow further development to be undertaken in
the longer term. A plan of the site is included in Appendix 2. 58. Whilst the site is located within the High Weald
AONB, the site is bounded by roads and development to the south which will minimise its impact on the wider area
by creating a clearly bounded extension to the north of the town that will not dissipate further into the AONB. This
is in contrast to the contingency site which is located to the north of the A26 within the AONB and is unconstrained
by defensible boundaries. It is therefore considered that more suitable sites to the north of Crowborough should be
included within the strategy for the development of Crowborough. GENERAL SUMMARY 59. It follows from the
general arguments set out above that we consider that the overall position of the proposed Core Strategy is such
that it has not been demonstrated to any satisfactory degree that it represents a reasonable approach to meeting
acknowledged housing demand. While the strategy appears satisfactory in dealing with the generalities of the
amount of growth it provides for there is a significant failure to deliver sufficient housing to meet the actual likely
future requirement, particularly in the north of the District. 60. The inclusion within the Core Strategy of housing
figures that are below those of the South East Plan and below those in ONS projections is not justified or,
importantly, explained in any meaningful way in the document, and in the absence of such adequate

Details of Changes to be Made:
The representation we have made include proposed changes to the Strategy
INTRODUCTION 1. The comments in this document are made on behalf of Evergreene Ltd and focus on a number of issues raised by the 2011 Core Strategy Proposed Submission Document. Initially the representations address how the housing figures have been derived, the distribution of housing in the District and the uneven balance of strategic development, which is primarily focused in the south of the District. In light of those comments we then consider amendments and additions to the document that should be made to ensure that it makes proper provision for the future planning of the District. 2. The overall point that we seek to make is that we support the emphasis on new housing in the south of the District, albeit that we question the manner in which the council has approached the issue of housing numbers and growth locations. The shortfall in the allocation of land for development is serious, and as a result it is considered that there is much greater importance in ensuring that those locations that are set out in the Strategy can be achieved. At Stone Cross, for instance, there are proposed allocations of land that would contribute in an entirely logical and appropriate way to the past development of the area and thus become a suitable extension to the settlement within defensible boundaries that did not exist when the first expansion of the settlement took place. 3. We deal first with the context of the Core Strategy and the level of housing development it proposes, in light of a significant failure to justify or explain the levels of development proposed. REGIONAL STRATEGIES 4. PPS 12 provides the guidance for the formation of Core Strategies and the legal requirements in order for an Inspector to declare the plan ‘sound’. Paragraph 4.50 sets out the checks an Inspector must make on the plan in order to fully comply with legislation. These include having regard to national policy and generally conforming to the Regional Spatial Strategy. Paragraph 4.33 in PPS 12 further illustrates this point and seeks to ensure Core Strategies are ‘consistent with national policy and in general conformity with the regional spatial strategy’. 5. The South East Plan allocated 11,000 dwellings to the Wealden District over the 20 year plan period 2006-2026, at a rate of 550 dwellings per annum, whereas the Proposed Submission Core Strategy allocates just 9600 over the 24 year period 2006-2030, an annual rate of 400 dwellings. The differences between the annual rate of dwellings and the plan periods are important to consider here, and this can be done in two ways: - a. The South East Plan period is 2006 - 2026. The Core Strategy plan period is 2006 – 2030; four years longer. The South East Pan requires 11,000 dwellings to be built during that period at a rate of 550 dwellings per annum. The Core Strategy would require just 8000 dwellings to be built between 2006 and 2026 at a rate of 400 dwellings per annum as proposed. This is a deficit of 3000 dwellings between the Core Strategy and the regional requirement. b. Conversely, if the South East Plan annual rate of 550 was applied to the Core Strategy plan period of 2006 – 2030 (24 years), this would amount to a need for 13,200 dwellings over the period 2006 - 2030. The Core Strategy requires only 9600 dwellings over this period, resulting in a deficit of 3600 dwellings. 6. The calculations show a clear deficit in housing provision in the Core Strategy when both annual rates and plan periods are accurately compared. 7. There has been significant debate surrounding the revocation of Regional Strategies and the latest High Court Order has confirmed that the intended abolition of the Regional Strategies by the Coalition Government can now be considered ‘material’ in future planning decisions. However, as the Cala Homes (South) Ltd v Secretary of State for Communities and Local Government and Winchester City Council [2011] EWHC 97 Judgement states, there are distinctions to be made between materiality and weight (paragraph 29). Therefore although this is a material consideration, it is the responsibility of the decision maker to defend their decision if there is any deviation from the guidance contained within the Regional Strategies. ‘Thus, in appropriate circumstances, a local planning authority in the reasonable exercise of its discretion may give no significant weight or even no weight at all to a consideration material to its decision, provided that it has had regard to it’ [our emphasis] (paragraph 30). The point here is quite clear; if the council wishes to deviate from the South East Plan it may do so, but only if there is clear and reasoned explanation given in the Core Strategy document that adequately justifies the approach taken. A failure to properly consider this issue will result in the Core Strategy being deemed unsound. 8. It is also essential in this context to have regard to paragraph 34 of PPS 3, which states ‘Regional Spatial Strategies should set out the level of overall housing provision for the region, broadly illustrated in a housing delivery trajectory, for a sufficient period to enable Local Planning Authorities to plan for housing over a period of at least 15 years.’ 9. The failure of the council to properly consider the appropriate level of housing provision and in addition to fail to properly explain and justify the reasons for the overall levels of growth that are promulgated is a significant deficiency in the Strategy and there is a need to consider substantial amendments to ensure the lack of soundness in this respect is overcome. POPULATION AND HOUSEHOLD PROJECTIONS 10. We have identified above the overarching issues in respect of the Strategy, relating to inadequacy of the council’s housing figure of 9600 over the plan period of 2006-2030 and the failure to adequately
justify why that figure should be accepted. In order to properly assess the soundness of the proposed Strategy it is also necessary to discuss actual housing need in relation to demographics and statistical information. 11. As we have already made plain, if the Core Strategy does not accord with figures in the South East Plan, the justification for the level of housing provision it proposes should be explained elsewhere. We have therefore examined the document to seek to establish whether such an explanation exists. 12. The only reference to statistical evidence within the Core Strategy is contained on page 13 under paragraph 3.10 which states: 'Trend based projections(1) show an increase in population in Wealden from 2006 to 2030 of around 19,000 persons, which equates to around 16,800 households.' 13. This is accompanied by a footnote which offers a reference to Office of National Statistics (ONS) trend based projections in addition to different figures from East Sussex County council. These contain a reference to a population increase of around 20,000 persons equating to 13,500 households and 13,000 additional dwellings. Both this comment and the direct reference in paragraph 3.10 indicate the need for a level of future housing that is considerably in excess of the council’s figures. 14. Background Paper 1 – Development of the Proposed Submission Core Strategy (BP1) also references ONS trend based population and housing projections on page 16, paragraph 5.11. This gives similar figures to those which are contained within the Core Strategy of a population increase of 19,200 persons equating to a need for an extra 16,800 households over the period 2006-2030. 15. We have also considered the ‘East Sussex in Figures’ website, which includes both trend based and policy based population and household projections for the different 25 year time periods. We have prepared the table below to highlight the comparison between the trend and policy based figures: - Trend Based Policy based Population projections Population projections 2008 2033 Increase 2001 2026 Increase 143,400 165,400 22,000 140,184 157,935 17,751 Household projections Household projections 2008 2033 Increase 2001 2026 Increase 61,290 77,684 16,394 58,466 71,356 12,890 The above figures have been sourced from www.eastsussexinfigures.org.uk 16. The important issue here is that it is unclear from the Core Strategy documents exactly which figures have been used, and it remains unclear despite our direct enquiries of the council on the matter. It seems likely, however, that trend based population and household projections have been obtained from this dataset. It may be the case that the figures above have been updated and that the council’s figures take into account previous figures available from 2006. These may then have been adjusted to fit in to the plan period of 2006-2030. 17. The trend based 2008 population projections were published by the Office for National Statistics (ONS) in May 2010 and the trend based housing projections are based on these figures but contain new household type categories recently developed by the Department of Communities and Local Government. 18. The trend based figures shown above are similar to the figures referenced in the Core Strategy, taking into account the adjustment of dates. However the footnote on page 13 refers to 13,000 additional dwellings, which is below any trend based figures previously referenced. It appears therefore that this may relate to the policy based figures, which are similar to the policy based household projection shown above (12,890), although there is some variation as the footnote references 2006-2031 and the above figures relate to 2001-2026. 19. The policy based figures shown above are described on the East Sussex in Figures website as being derived from housing provision figures provided within the South East Plan, housing trajectory work provided by the relevant council’s in September 2009, and they are modelled on the Chelmer Model. This is mentioned on page 16 of BP1 in paragraph 5.12 where it is noted that: 'Due to the complexity of the model, the information used to predict future demand can not be examined in any great detail.’ 20. This is insufficient as the basis for the projections for future growth within the Core Strategy relies on these figures and it is the purpose of Background Papers to adequately explain these findings. This is especially the case as the council’s figures have been inadequately referenced and deviate considerably from all other relevant sources. 21. It is noted that although the footnote on page 13 of the Core Strategy is not properly referenced and there is no background information relating to how this information has been derived, the number of households (13,500) is more than the number of additional dwellings required (13,000). It is assumed that the extra 500 homes have been accommodated for through the council’s own information regarding long term empty dwellings in the District, short term empty dwellings due to an occupant’s death or houses currently being sold on the market. However it is considered that this slight drop in the number of households compared to the number of dwellings required is not greatly significant to argue for less housing need. Furthermore these figures have not been adequately referenced or justified and the calculations used to reach these figures are unavailable. HOUSING REQUIREMENT 22. It is predominantly trend based population and household projections which have been referenced within the Core Strategy where it is then explained on page 13, paragraph 3.10 that: ‘This shows the demand for both market and affordable housing is high, and in excess of that which could be accommodated or delivered within Wealden.’ 23. This appears to be the basis of the council’s approach to the Core Strategy as a matter of basic principle; that the level of housing proposed for the District is less than the figure of new dwellings required by reference to regional policy and less than that indicated to be required by all other relevant sources for the reason that the District has insufficient capacity to accommodate housing at the levels required. This is the sole extent to which the council attempts to justify the 9600 housing figure. 24. However, there is no adequate explanation anywhere in the Strategy as to why the projected increase in households cannot be accommodated in the District. Of even greater importance, the Strategy, having stated that insufficient dwellings to meet identified need will be allowed for, fails in any way to consider or try to quantify the potentially significant social, economic and housing problems that an acknowledged failure to meet projected future requirements will cause. AFFORDABLE HOUSING 25. It is notable in respect of the council’s failure to deal with these issues that in Background Paper 1 – Development of the Proposed Submission Core Strategy (BP1) the council repeatedly concludes that high levels of housing are required within the District and acknowledges that
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this need is identified in a variety of demographic and statistical evidence. 26. The issue of affordable housing is raised within the Core Strategy in Background Papers 1 – Development of the Proposed Submission Core Strategy and 2 – Managing the Delivery of Housing. The council’s Housing Needs Assessment (January 2010) is referenced on page 17, paragraph 5.14 of BP1 which describes how the need for affordable housing cannot be accommodated within the District despite evidence showing a great need. This is again referenced within BP2 (page 3, paragraph 2.3) where the council’s Strategic Housing Market Assessment (SHMA) has also been referred to which addresses ‘very significant affordability issues’ within the District. BP2 (page 3, paragraph 2.3) also identifies Wealden as one of the highest house price areas in the country. 27. However, there is no correlation between the extent to which the failure to produce adequate levels of affordable housing that would result from the overall approach to Core Strategy housing provision would result in social deprivation and other long term problems for the population of the District. That is in our view a fundamental deficiency of the Strategy.

DEMOPGRAPHICS 28. BP2 - Managing the Delivery of Housing (page 3, paragraph 2.4) - explains the demographic structure of population and households within the District. There are a number of trends which have been referred to, including a decrease in household size, resulting in more single person households, particularly the elderly. The demand for housing from demographic evidence, coupled with the economic prosperity considerations below, mean that the overall health of the District depends on a future growth in population. It is therefore the responsibility of the council to provide enough housing both of the correct type and in the correct location, in accordance with the nature of demand outlined above.

ECONOMIC PROSPERITY 29. It is a requirement of PPS 4 Planning for Sustainable Economic Growth, that local authorities should include within their plans a clear economic vision for their areas which ‘positively and proactively encourages sustainable economic growth’ (page 7, EC2.1 (a)). 30. Due to the need to maintain an economically active and consumer based population in line with PPS 4, in-migration is encouraged by the council. BP2, page 3, paragraph 2.4 states:- ‘In order to maintain the viability of services and facilities and the vitality of the local economy there is therefore a requirement for significant new housing development within the District which would encourage some in-migration in order to maintain population levels’. 31. In addition, ONS figures for 2007 indicate a net inward migration from within the UK to Wealden of 800 people (arising from 7,800 leaving the District and 8,600 entering), which demonstrates in-migration is occurring and adds to the demand for housing within the District. 32. It is noted within BP2, page 3, paragraph 2.4: - ‘This natural change, leading to a declining and more elderly population, could have a potentially very damaging effect on the future customer base on existing services and facilities within the District as well as for the viability and vitality of Wealden’s town centres by reducing the economically active sector.’ 33. This effectively acknowledges that on economic grounds an increase in the population that would be the result of a higher level of housing growth is required to enable the District to maintain and improve its economic base and to facilitate protection of existing employment levels and facilitate employment growth. 34. None of these considerations relating to housing and economic need are evident within the housing figures which the Core Strategy proposes overall. The low figure of 9600 is not adequately justified within any of these documents, despite evidence to show that higher levels of housing are needed and would be beneficial to the future growth of Wealden, particularly to maintain the vitality of town centres and support economic growth.

CONSTRAINTS WITHIN WEALDEN 35. The Core Strategy and BP1 identify constraints within the District which is considered to restrict housing growth in certain areas. These are outlined on page 23 of BP1, paragraph 6.2 and include the issues of waste water treatment capacity in the south of the District and the need to protect the rural nature of the District and the High Weald AONB. Also included within constraints for Uckfield, Polegate and Hailsham in the Core Strategy are traffic management and congestion problems in the town centres with significant infrastructure improvements required. 36. However this must be contrasted against the above evidence where ONS figures show a demand for housing given the projected increase in population, the overwhelming need for affordable housing and the need for in-migration to tackle population needs of the Wealden District and support economic prosperity. This goes to the heart of the need for the Core Strategy, which should seek to plan positively for appropriate growth in balance with the acknowledgement of constraints, rather than reducing growth rates arbitrarily. 37. Although these constraints and needs have been referred to within the documents relating to the Core Strategy, there is no statistical analysis to ascertain how the 9600 housing figure has been decided. There is also no explanation as to why the figures have been decreased from the South East Plan allocation, which for the Core Strategy plan period would be 13,200, or as to why the proposed allocation fails to meet household requirements. BP2 (page 3, paragraph 2.3) also identifies Wealden as one of the highest house price areas in the country. 27. However, there is no correlation between the extent to which the failure to produce adequate levels of affordable housing that would result from the overall approach to Core Strategy housing provision would result in social deprivation and other long term problems for the population of the District. That is in our view a fundamental deficiency of the Strategy.

FORWARD PLANNING 39. Based on the discussion and evidence referenced above, it is considered that 9600 is not an appropriately justified housing figure for the District. The figure fails to take into account the need for future growth in the District and does not propose effective forward planning which is the main purpose of Core Strategies. 40. The only justification for providing this figure seems to
be based on past housing figures. This is contained within the Core Strategy on page 29, paragraph 5.13 which explains how over the last 21 years an average of 400 dwellings have been built per annum in the District and that based on this, a similar rate is achievable in the future. 41. This does not provide for effective forward planning as evidence is based on past results rather than remaining focused on future growth. It is evident from the projected population figures that population is expected to increase and if Wealden are unable to accommodate this growth, it will force people to reside outside of the District. This increases pressure on neighbouring authorities who suffer their own constraints and it is the responsibility of Wealden District Council to address this growth properly.

PROPOSED REVISED HOUSING FIGURES 42. The South East Plan allocated 11,000 dwellings to the District based on national housing figures and fair distribution across the region taking into account policy considerations of each District and national housing need. The DCLG policy based population and housing projections are run under the same assumptions of the trend based projections in terms of fertility, mortality and migration level, but additionally they take into account the number of houses planned to be built during the projection period. The migration level is then adjusted according to the future housing provision. This information has been obtained in response to a specific enquiry from East Sussex County Council, correspondence of which has been attached as Appendix 1. 43. On this basis it is considered that the policy based projections fairly assess population growth and the requirements of the District. It is therefore proposed that in order to accommodate the requirement for more housing based on the evidence addressed above, it is fundamental to work towards a figure of 13,000 as proposed both by the South East Plan and justified by policy based household projections. If this position is not concurred with then the 11,000 figure allocated within the South East Plan must be taken as an absolute minimum. 44. This will then adequately accommodate for projected population growth, in-migration and economic prosperity. It will also accommodate for changing demographics of smaller households and an increase in housing will greatly help to address the apparent affordability problems in the District. It will encourage a greater choice of types and tenures of housing and subject to national requirements, affordable housing can be promoted through larger housing development schemes. DISTRIBUTION OF HOUSING 45. The overall approach to dealing with levels of development in the south of the District, reflecting the requirements of the South East Plan, is acknowledged and accepted. The council’s approach to development in these areas is acceptable in principle and in many respects the locations for proposed development are also considered to be appropriate. 46. The discussion earlier in this document highlights the very significant and acknowledged need for a more substantial housing figure in the District. The general approach to housing provision in the south is accepted and the location of development on the periphery of existing settlements such as Stone Cross is considered an appropriate means of accommodating the locations for proposed development are also considered to be appropriate. 46. The discussion earlier in this document highlights the very significant and acknowledged need for a more substantial housing figure in the District. The general approach to housing provision in the south is accepted and the location of development on the periphery of existing settlements such as Stone Cross is considered an appropriate means of accommodating development in a suitably sustainable manner. 47. In particular there is land south of Dittons Road at the western end of the settlement that has been recognised by the council to be appropriate for development in the SHLAA exercise. It is bounded by defensible boundaries (roads and a former railway line) and the need for much greater emphasis on the provision of housing dealt with earlier in these representations means that its development should be strongly supported. GENERAL SUMMARY 48. It follows from the general arguments set out above that we consider that the overall position of the proposed Core Strategy is such that it has not been demonstrated to any satisfactory degree that it represents a reasonable approach to meeting acknowledged housing demand. While the strategy appears satisfactory in dealing with the generalities of the amount of growth it provides for there is a significant failure to deliver sufficient housing to meet the actual likely future requirement, particularly in the north of the District. 49. The inclusion within the Core Strategy of housing figures that are below those of the South East Plan and below those in ONS projections is not justified or, importantly, explained in any meaningful way in the document, and in the absence of such adequate explanation it can only be concluded that the Strategy is unsound and will fail to provide an adequate future policy base. 50. The housing figures allocated within the Core Strategy are not sufficient to accommodate adequate growth in the District and would result in the plan failing the tests of soundness. The 9600 housing figure has not been derived from robust statistical analysis and instead relies upon past annual housing figures. The Core Strategy overall housing figures therefore fail to accommodate for future growth and effective forward planning. 51. It is considered that there is a need to allocate 13,000 dwellings over the plan period 2006-2030 to adequately address the issues relating to policy based population growth and housing requirements. Moreover, here are a number of suitable locations within the District available for housing development which do not compromise the constraints highlighted within the Core Strategy. 52. The failure of the Core Strategy to make provision in this way means that additional housing allocations are necessary and the allocations already set out in the Strategy should be strongly supported, in particular that relating to land at Stone Cross, in order to meet likely future requirements. The balance of the Strategy is significantly weighted towards the south of the District and in very general terms this overall approach to housing and economic development in the south, and the balance with necessary associated infrastructure provision, is justified. 53. In order for the council to focus on effective forward planning, it must appropriately consider the identified housing requirement and sustainable distribution of housing development which should be based on statistical analysis and balanced policy considerations. This will encourage economic prosperity in identified town centres, encourage a greater choice of housing which will help to tackle affordability issues and ensure the continued vitality of the District towns without compromising the rural nature of the District.

Details of Changes to be Made:
Our representations make reference to changes we consider necessary to the Strategy
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Representation ID
313

Person ID  Mr  Hatfield  Agent ID  Mr  Hatfield
104480  102470  J J Hatfield & Co Ltd

Paragraph  5.2
Sound  ☐ Yes  ☑ No  ☑ Justified  ☑ Effective  ☑ Consistent with national policy
Legally Compliant  ☑ Yes  ☐ No

Details of Reasons for Soundess/ Legal Complianc:

Proposed Urban Extension in North & East Hailsham Planning Policy Statement 1 (PPS1), states that; ‘In preparing development plans, planning authorities should seek to: Reduce the need to travel... and focus development in existing centres and near to major public transport interchanges.’ The urban extension to north Hailsham (SD3) identified in the Figure 7 of the Proposed Submission Core Strategy (PSCS) is 1.95 km from the centre. Although the southern sections of the east extension (SD2) would be close to the town centre the northern sections would be approximately 2.2 km from the town centre. In contrast, southern sites identified as being suitable in the SHLAA (in particular Oaklands & The Brickfield SHLAA Ref 100/1310) are located 1.2 km from the town centre. This shorter distance means that trips into the town centre are much more likely to be undertaken on foot or bicycle rather than in a car. On this basis, the proposed residential development to Hailsham as identified in Figure 7 for the PSCS is contradictory to PPS1. This point was also highlighted by the Strategic Housing Land Availability Assessment. The site at Danecroft Nursery, Station Road, Hellingly and adjacent site at 13 Station Road, Hellingly are both within the north extension (SD3), and were deemed to be unsuitable for development by the SHLAA. This was because as stated; ‘These sites are relatively isolated and are remote from local services and facilities. They are disconnected from the boundary of Hailsham which is some distance away. Housing development would be unsustainable and would have the effect of consolidating a linear form of built development in this semi-rural location.’ PPS 1 states that; ‘In some circumstances, a planning authority may decide in reaching a decision to give different weight to social, environmental, resource or economic considerations. Where this Is the case, the reasons for doing so should be explicit and the consequences considered.’ The various studies undertaken in preparation for the PSCS do not address this issue. No compensatory positive reason is given for the location of development so removed from the town centre. The evidence base study; ‘Landscape Character Assessment and Development Option Evaluation Study’ undertaken in 2009 in preparation for the PSCS states that; ‘Development of the northern fringes of Hailsham would be north of the A271 and isolated from the town..... The isolated nature of this development which is removed from the town centre of Hailsham contradicts guidance in PPS1. PPS1 states that Planning Authorities should; ‘ensure that the impact of development on the social fabric of communities is considered and taken into account’. Hailsham is more able to accommodate smaller sites to the south than larger sites to north and east. Flood Risk According to Figure 7 of the PSCS, sites identified to the north and east of Hailsham (SD2 and SD3) are positioned alongside a flood prone area. The Strategic Housing Land Availability Assessment (SHLAA) also points out that; ‘the eastern side of the north site are within Flood Zones 2 & 3’ve PPS 1 states that ‘new development should be avoided in areas at risk of flooding’. Strategic Gap Section 3.10.7 of the ‘Landscape Character Assessment and Development Option Evaluation Study’ states that; ‘The countryside to the south of Ersham Road and Ingrams Way is more enclosed and has a stronger character than areas to the east. This is the strategic gap between Polegate and Hailsham and should be protected to prevent coalescence.’ The land south and west of Ersham Road is associated with previous use as a brickfield. There are a number of existing residential developments dotted around this area with the predominant use of the land being for horses and riding. There is existing residential development adjacent to the B2104 (Ersham Road) which is further south than southern sites identified as being suitable by the SHLAA. Development at this location would provide infill between this isolated area of housing and the existing south urban fringe of Hailsham. There is also additional existing development south of this site adjacent to the A22 (Woodside Way). It is therefore not accurate to say that development south of Ersham Road and Ingrams Way would reduce the strategic gap between Hailsham and Polegate. There is currently a gap of 2.5 km between the south side of Oaklands Farm & The Brickfield and the north edge of Polegate. This is a considerable distance. The proposed development of the northern sites such as those identified in Figure 7 of the PSCS would mean that the historic village of Hellingly would effectively become engulfed by Hailsham. Referring to the Hellingly Hospital site; Section 4.9.2 of the Landscape Character Assessment and Development Option Evaluation Study’ states that; ‘The consideration of this area as a new settlement should avoid coalescence between the settlements at north Hailsham and the village of Hellingly..... A new community in this area would need to include the areas to the north of Upper Horsebridge.’ Since the north extension (SD3) identified in Figure 7 of the PSCS would be located 350m from Hellingly, it seems clear that coalescence would occur between north Hailsham and the village of Hellingly. This seems to be a blatant contradiction to the aims of the Landscape Character Assessment and Development Option Evaluation Study. BP1: ‘Development of the Proposed Submission Core Strategy’ Document BP1: ‘Development of the Proposed Submission Core Strategy’ – February 2011’ section 8.21 refers to south sites indentified in the SHLAA as; ‘area with rural character compared to other broad locations. The access to the town centre, and the proximity
of the A22 would not provide a suitable alternative to car use, and compared to other broad locations would not benefit the town centre and the wider population to such degree.’ This assessment is not accurate. Access to the town centre from the identified south sites is superior to that of the north sites identified, with an existing bus stop located on the adjacent B2104 providing regular 3 minute shuttles directly to the town centre. The south sites are significantly closer to Hailsham town centre (1.2km rather than 2.2km) than the north sites identified in the SHLAA and increase the likelihood that this journey would be taken by bicycle or foot. Section 8.24 of Document BP1 provides an assessment of the north sites identified in the SHLAA, stating: ‘In order to maximise the use of existing waste water capacity the strategy is directed to north Hailsham.’ The SHLAA contradicts the above, stating that the northern site at Upper Horsebridge, Hailsham for 520 dwellings is currently not deliverable due to the current wastewater capacity constraints at Hailsham North Wastewater Treatment Works. With reference to the north site, Section 8.24 of Document BP1 goes on to state: ‘It is less sensitive in terms of landscape impact, provides an opportunity to consolidate development at Hellingly Hospital and has the necessary road linkages and ability to create mixed housing and employment areas. Provision of services in this location will not detract from the town centre and will help provide for the wider area, and allows for the provision of additional primary school places.’ The assessment states that development at this site would be less sensitive in terms of landscape impact despite being adjacent to the historic village of Hellingly containing several listed properties. It is also contrary to the Assessment made in 2001 in the then Local Plan Review Landscape Appraisal. Conclusion The PSCS has been prepared using flawed evidence base studies such as BP1: ‘Development of the Proposed Submission Core Strategy’ and the ‘Landscape Study’. The use of such studies has meant that the PSCS has not been able to provide the most appropriate strategy for development of sites surrounding Hailsham. The PSCS is not consistent with national policy document PPS1 in that the proposed residential development at Hailsham is not positioned close to the town centre and existing facilities. The Council has not been able to provide clear and convincing reasoning to justify the approach of positioning development to the North of Hailsham which is isolated from the town centre and does not comply with PPS1. The Oaklands and Brickfield site south of Hailsham (SHLAA 100/1300: 224 dwellings) is largely on previously-developed (brownfield) land and has a highways scheme to be paid for by the developers agreed with East Sussex County Council and should be included in the SDAs to the exclusion of less suitable development. It meets the Hailsham Sustainability Objectives, being a local Urban Extension within walking distance of Hailsham town centre and offering proximity to open space, woodland and biodiversity – at a scale capable of delivering up to 224 dwellings with minimum impact on infrastructure and environmental amenity.

Details of Changes to be Made:
The main growth areas proposed are not consistent with the Council’s and Governments aim of reducing travel distances and housing development around Hailsham should be concentrated closer to the town centre.
1.1 The Amount of New Housing – Policy WCS1 and WCS2 and paragraphs 5.3 etc 1.1.1 We note that the proposed Submission Core Strategy looks to accommodate 9574 new dwellings in the district across the plan period (2006 – 2030) i.e. 399 a year. This is circa 27.5% less than the 11,000 dwellings proposed across the district in the South East Plan (SEP) (May 2009) for the period 2006 and 2026. 1.1.2 PPS12 requires Core Strategies to conform generally to the regional policy. We do not consider the amount of new housing proposed in the district to be legally compliant as it is not consistent with regional policy as set out in the SEP. 1.1.3 Whilst the LPA appear to be progressing with a lower level of growth on the assumption that the SEP will be revoked by the time the Core Strategy gets to examination, the fact is the SEP remains part of the development plan at present and the CS should have regard to the aims and objectives of the SEP/ justify why it is necessary and appropriate to depart from it. The proposed Submission Core Strategy contains no such justification. 1.1.4 A detailed understanding of the background to the amount of new housing proposed in the district in the SEP is in our opinion important in considering the soundness of the housing land supply strategy now being advocated in the proposed Submission Core Strategy document. 1.1.15 The Chief Planning Officer (CPO) in his letter of the 6th July made it clear that in the context of the revocation of the RSS LPAs would be responsible for determining the housing numbers in the absence of a regional target, and that the housing numbers promoted by LPAs would need to be justified, as LPAs would need to defend them through the LDF examination process. 1.1.19 The District Council has an obligation to assess and provide for the housing needs and demands of the District. Paragraph 33 of PPS3 makes it very clear that in determining local levels of housing provision local planning authorities should, in preparing their Core Strategies take into account evidence of current and future levels of housing need and demand, e.g. as set out in Housing Market Assessment and the Housing Needs Assessment. 1.1.22 Having regard to the above we feel the DC should give consideration to the accommodation of at least 13,200 (i.e. the 11,000 set out in the SEP plus 4 x 550) to cover the additional years to 2030). Given the 4,889 units are already committed this would leave a residual requirement of 8,311 i.e. a residual requirement equivalent to 415 dwellings pa. If, 75% of the 13,200 units were on sites that generated an affordable housing need under the new policy WCS8, this level of provision could provide for circa 3,465 affordable dwellings i.e. 18% of the affordable need identified in the HNA. Which demonstrates how sever the need is relative to the supply 1.1.23 WDC’s aversion to higher housing numbers appears to be related to the effect these could have on infrastructure and services, especially in the southern part of the district. However, it is often the case that the strategic housing allocations help to address this issue, providing new transport links/highway improvements, contributing to new sustainable drainage facilities, new schools, medical facilities etc. Higher levels of growth need not prejudice existing infrastructure and services; they could in fact help address existing problems. 1.2 Housing Distribution 1.2.1 We do not consider the housing distribution strategy to be legally compliant. It is not consistent with regional policy as set out in the SEP. PPS12 requires Core Strategies to conform generally to the regional policy. 1.2.2 Having regard to the above we feel the DC should give consideration to the accommodation of at least 13,200 (i.e. the 11,000 set out in the SEP plus 4 x 550) to cover the additional years to 2030). Given the 4,889 units are already committed this would leave a residual requirement of 8,311 i.e. a residual requirement equivalent to 415 dwellings pa. If, 75% of the 13,200 units were on sites that generated an affordable housing need under the new policy WCS8, this level of provision could provide for circa 3,465 affordable dwellings i.e. 18% of the affordable need identified in the HNA. Which demonstrates how sever the need is relative to the supply 1.2.3 WDC’s aversion to higher housing numbers appears to be related to the effect these could have on infrastructure and services, especially in the southern part of the district. However, it is often the case that the strategic housing allocations help to address this issue, providing new transport links/highway improvements, contributing to new sustainable drainage facilities, new schools, medical facilities etc. Higher levels of growth need not prejudice existing infrastructure and services; they could in fact help address existing problems. 1.2.4 Housing Distribution 1.2.1 We do not consider the housing distribution strategy to be legally compliant. It is not consistent with regional policy as set out in the SEP. PPS12 requires Core Strategies to conform generally to the regional policy. Paragraph 4.33 states that choices to be made on where growth should take place should follow national and regional policy. 1.2.2 The southern part of Wealden district is located within the Sussex Coast Sub Region, one of the nine sub regions identified in the SEP. These sub regions were to be 'the focus for growth and regeneration'. Policy SP1 of the SEP refers 1.2.3 Policy H1 of the SEP deals with regional housing provision. It stipulates that in the Sussex Coast Sub Region, 69,300 net additional dwellings should be provided between 2006 and 2026. 1.2.4 Policy SCT5 of the SEP sets out the scale and distribution of housing across the Sussex Coast sub region. It indicates that that part of Wealden District which falls within the Sussex Coast Sub Region should seek to accommodate 7000 dwellings during the plan period (2006 – 2026) i.e. 350 dwellings per annum. 1.2.5 Given the above, and having regard to the requirements of policy H1b of the SEP (wherein WDC are required to provide some 11,000 units across the district during the plan period (2006-2026)), it is clear that the SEP looks to focus growth within that part of the district that falls within the Sussex Coast Sub Region, with only a small proportion of development (4000 homes) to be accommodated within what was called the Rest of the District. 1.2.6 The SEP also makes it clear that the Sussex Coast Sub Region was identified as an area where the government was looking to proactively pursue and promote economic growth and regeneration. As a result over 60% of WDC’s housing requirement was located within the Sussex Coast Sub Region. The spatial strategy being promoted in the proposed Submission Core Strategy document is, according to paragraph 5.5 of the proposed Submission Core 493/A3/JA April 2011 Strategy document, predicated upon the strategy objectives and the settlement hierarchy. Thus only circa 51% of the proposed level of housing growth is to be located within what was referred to as the Sussex Coast Sub Region in the SEP. 1.2.7 Not only is the spatial strategy inconsistent with the SEP, but it fails to take on board the reason for
the spatial strategy proposed in the SEP i.e. the economic regeneration of the Sussex coastal area. WDC have, in their sustainability appraisal of the proposed Submission Core Strategy Document failed to assess the implications of the spatial strategy advocated in the proposed Submission Core Strategy Document on the economic regeneration of the Sussex coastal area. The council’s failure to undertake this work means that the proposed Submission Core Strategy Document is not soundly based. 1.2.9 In promoting an annual housing requirement of just 400 units WDC, in their proposed Submission Core Strategy document, are in our opinion actively stifling economic growth. Furthermore, the council’s decision to treat the whole district as a single entity, with no emphasis placed on the regeneration of the Sussex Coast Sub Region, is in our opinion, despite the aspirations of policies SP03, 04 and 06, actively prejudicing the economic regeneration of the coastal area, to the detriment of the wider area. 1.2.11 As currently drafted the housing distribution strategy advocated by WDC in their Proposed Submission Core Strategy is not in ‘general conformity’ with the RSS as required by Paragraph 4.2 and 4.33 of PPS12 and is not therefore sound.

Details of Changes to be Made:
3.1 The Amount of New Housing:- 3.1.1 We feel the housing targets set out in policy WCS1 should having regard to our position on the scale of housing growth be amended from 9600 to 13,200 dwellings. 3.1.2 Similarly we feel the housing targets set out in policy WCS2 of the CS should, having regard to our position on the scale of housing growth, the spatial strategy, and the level of housing proposed in Stone Cross specifically, be amended thus:- WCS2 Distribution of Housing Growth 2006 – 2030 Town/ settlement Stone Cross and Westham 42 Built or already committed - 980 New allocations; total dwellings 2006 - 2030 1,022. Total Wealden 4,889 Built or already committed; 8,311 new allocations; 13,200 Total Dwellings 2006 - 2030. 3.1.3 We would also suggest that the number of new allocations is revised to ensure that 60% of the proposed growth is located in the Sussex Coast Sub Region, as per the SEP, which should be identified on a plan. 3.1.4 Having regard to the above there would also be a need to amend policy SPO3 to address the increase in housing supply we advocate, and the reinstatement of the Sussex Coast Sub Region. Similarly paragraphs 3.11 and 3.16 would need to be revised to reflect our position, with the economic policies (SPO6 and WSC3 reviewed accordingly). 3.1.5 If the scale of housing proposed during the plan period is not revised as recommended, we would suggest that policy WCS2 is revised thus:- WCS2 Distribution of Housing Growth 2006 – 2030 Town/ settlement Stone Cross and Westham 42 Built or already committed - 850 New allocations; total dwellings 2006 - 2030 892. Total Wealden 4,889 Built or already committed; 4,835 new allocations; 9,724 Total Dwellings 2006 - 2030. 3.1.6 Given our recommended changes to the scale of growth proposed at Stone Cross and Westham we would also recommend that paragraph 6.31 (3) and paragraph 6.31 (3 bullet points 3, and 4 be amended thus:- ‘allocating a range of deliverable housing sites for up to 700 dwellings, and leisure, recreation and community facilities in Polegate and Willingdon, around 850 dwellings in Stone Cross, with some 16,890 sq. metres employment floorspace in the Polegate and Willingdon area. Sites for development will be identified and phased through the Site Allocation DPDs including: · provision of around 550 homes within an extension to the urban area of Stone Cross to the east and south east (SD6), with flexibility between SD6 and SD7, subject to highway improvements; · provision of around 300 homes within an extension to the urban area of Stone Cross to the north (SD7), with flexibility between SD6 and SD7, subject to highway improvements’

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<tr>
<td>Person ID</td>
<td>Mr Marsh</td>
</tr>
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<td>Agent ID</td>
<td>Mid Sussex District Council</td>
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It is unclear within the Proposed Submission document as to what the overall housing requirement is based upon (i.e. South East Plan, Option 1. Locally Generated housing required?) For example paragraph 5.3 and Policy WCS1 gives a total number of dwellings to be built within the District for the period 2006 - 2030 but do not indicate where the total has been derived from. Although it is assumed this is the South East Plan requirement, this could do with being made clearer.

Details of Changes to be Made:
Summary of all Representations - Proposed Submission Core Strategy Regulation 27 - Report 11th July 2011

Details of Reasons for Soundness/ Legal Compliance:
1. We note paragraph 5.3 states that the Core Strategy and subsequent DPDs will be allocating land for at least 4,685 additional dwellings over the period April 2010 – March 2030. However, Policy WCS1 (Provision of Homes and Jobs 2006 – 2030) states that land will be identified in subsequent DPDs for the provision of some 4685 net additional dwellings in Wealden District to provide for 9,600 dwellings over the period 2006 – 2030. It is considered that Policy WCS1 should reflect the wording set out in paragraph 5.3 to accommodate the possibility of more housing development coming forward, for example on windfall sites. Therefore, the wording of Policy WCS1 should read “land will be identified in subsequent DPDs for the provision of at least 4,685 net additional dwellings in Wealden”.

Details of Changes to be Made:

Details of Reasons for Soundness/ Legal Compliance:
"Supplementary documents have been submitted but not attached, and may be viewed at the Council offices on request".

Details of Changes to be Made:
REVISION SOUGHT Increase housing requirement to 8,311

Details of Reasons for Soundness/ Legal Compliance:
Objection has already been made to policy SPO3 on the grounds that it is unsound, and that it should instead provide for 17,300 new dwellings over the plan period. That same objection is thus made in respect of policy WCS1 for the reasons previously set out.

Details of Changes to be Made:
Summary of all Representations - Proposed Submission Core Strategy Regulation 27 - Report 11th July 2011

Representation ID
59

Person ID  Mr Nichols
517509

Agent ID
Eastbourne Borough Council

WCS1 Provision of Homes and Jobs 2006-2030
Policy 1

Sound  [ ] Yes  [x] No  [x] Justified  [ ] Effective  [ ] Consistent with national policy
Legally Compliant  [x] Yes  [ ] No

Details of Reasons for Soundness/ Legal Complaince:
Eastbourne Borough Council notes the level of housing and employment land being proposed in the Wealden Proposed Submission Core Strategy on the basis that it is backed by a series of documents and background papers. These documents collectively, back the proposed levels of housing, employment and retail development established, and provide a justification for a reduction in the level of growth originally established in the recently revoked South East Plan. Eastbourne Borough Council shared Wealden District Council’s concerns about the ability of Wealden to deliver 11,000 net additional dwellings between 2006 and 2026. There are numerous capacities and constraints, particularly in the southern part of the District, (which had been earmarked in the South East Plan for the greatest proportion of Wealden’s housing target). The approach that seeks to limit the magnitude of housing and employment development to the capacity that the District can reasonably and sustainably accommodate is therefore supported and is considered a more appropriate level of development that will help ensure that the existing settlements retain their distinct identities. Eastbourne Borough Council considers that the level of growth established in Policy WCS1 has been set at a level that represents an effective balance between the need to provide new housing and employment land, whilst at the same time ensuring that the environment is protected and enhanced for future generations. Furthermore, the level of growth has taken account of the various existing and anticipated local infrastructure constraints and therefore represents a sound basis upon which to move forward. It is clear that the proposals established in the Wealden Proposed Submission Core Strategy will have major implications for Eastbourne but the Council considers that any potential issues can be successfully resolved by continuing constructive discussions between the two local authorities. Whilst the Council acknowledges the proposals in principle, it is considered that the wording of Policy WCS1 should be amended to clarify the time period that the “4,685 net additional dwellings” will be provided in. This issue is partially clarified in Policy WCS2 but Policy WCS1 could be enhanced by being more explicit in what has already been delivered and what is still required. This issue is partially addressed in Policy WCS2 but even there it is not immediately obvious what has actually been built between April 1st 2006 and March 31st 2010. In addition, the employment land requirement, which states that “provision will be made for some net additional 40,000 sq metres net employment space (B1/B2/B8) to provide some 128,695 sq. metres net employment space and 17,000 sq. metres net additional retail floorspace” should be broken down more clearly into the constituent parts so that it is clearer about what development has already been provided and what is still required.

Details of Changes to be Made:

Amend housing fiure to 13200 dwellings for period 2006-2030 and nett additional housing to 8285.

Representation ID
43

Person ID  Mr Courtley
513493

Agent ID
Mr Courtley
102476

WCS1 Provision of Homes and Jobs 2006-2030
Policy 1

Sound  [x] Yes  [ ] No  [x] Justified  [ ] Effective  [ ] Consistent with national policy
Legally Compliant  [ ] Yes  [x] No

Details of Reasons for Soundess/ Legal Complaince:
The Councils housing figure should until proven unsound rely on evidence of the population forecast of the RSS. The housing figure for Wealden DC should be 13200 for period 2006-2030 with a nett housing requirement of 8285 dwellings.

Details of Changes to be Made:
Amend housing fiure to 13200 dwellings for period 2006-2030 and nett additional housing to 8285.
Representation ID
79
Person ID 337596
Agent ID 518363
Redrow Homes (Eastern) Boyer Planning Ltd
WCS1 Provision of Homes and Jobs 2006-2030
Policy 1

Sound ☑ Yes ☐ No ☐ Justified ☑ Effective ☐ Consistent with national policy
Legally Compliant ☑ Yes ☐ No

Details of Reasons for Soundness/ Legal Complaince:
We recognise the Authority's approach to utilising the post-revocation flexibility in relation to the housing requirements as set down in the South East Regional Plan. In particular we note the reduction from 11,000 homes required in Wealden between 2006 - 2026 within the final South East Plan to the revised housing figure of 9,600 (as originally recommended in the Draft South East Panel Report). Overall we support the requirement for 9,600 homes within the plan period of 2006 - 2030, and the consequent 400 dwellings per annum. In terms of the components of supply we note that the Authority considers that there exists a significant contribution to the 9,600 homes, consisting of 1331 dwellings that have already been constructed within the plan timeframe (between 2006 and April 2010) as well as 3,558 dwellings committed through extant planning consents and deliverable Non Statutory Plan allocations. Overall this comprises of total of 4889 dwellings. As a result we support the residual requirement of 4,685 new allocations to be provided within the plan period. Whilst the largest proportion of the new allocations have been distributed throughout the Strategic Development Areas (Spatial Strategy Policy WCS4), we support the inclusion of at least 455 new dwellings within the Rural Villages, as per Spatial Strategy Policy WCS2: Distribution of Housing. Furthermore, we support the largest proportion (100 dwellings) of the new rural allocations within the settlement of Horam as per our representations to WCS6: Rural Area Strategy.

Details of Changes to be Made:

Representation ID
134
Person ID Mes Gribble
Agent ID 102476
106087
WCS1 Provision of Homes and Jobs 2006-2030
Policy 1

Sound ☐ Yes ☑ No ☑ Justified ☑ Effective ☑ Consistent with national policy
Legally Compliant ☑ Yes ☐ No

Details of Reasons for Soundess/ Legal Complaince:
The Councils housing Figures should until proven unsound rely on the evidence and results of the public examination forecast of the RSS. The housing figure for Wealden DC should be increased to 13200 for the period 2006-2030 with a nett housing requirement of 8285 dwellings.

Details of Changes to be Made:
Amend the Councils housing figures to 1300 for perid 2006-2030 and nett additional housing to 8285.
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WCS1 Provision of Homes and Jobs 2006-2030 Policy 1

**Details of Reasons for Soundess/ Legal Complaince:**

The total amount of housing proposed by the draft Core Strategy is insufficient. DCLG household projections demonstrate that by 2030 there will be approximately 76,000 households in Wealden, an anticipated increase of around 15,500 households between 2006 and 2030. The Council states that they are unable to meet the need for housing yet do not submit any compelling evidence of this. They aim to meet approximately 57% by delivering 9600 dwellings by 2030. This equates to a shortfall in housing of approximately 5900 dwellings. In this respect the Core Strategy conflicts with its evidence base. The Strategic Housing Land Availability Assessment Report (March 2010) identifies a supply of suitable sites that are currently outside of the planning process capable of delivering a total of 18257 dwellings in the period between 2009 and 2026. The SHLAA demonstrates that the Council is capable of delivering enough housing to meet the need identified by DCLG projections therefore it is submitted that that the Core Strategy is not ‘justified’ as it fails to take account of its evidence base therefore it is ‘unsound’. The draft Core Strategy is not consistent with Planning Policy Statement 1: ‘Delivering Sustainable Development’ where it states that “In preparing development plans, planning authorities should seek to bring forward sufficient land of a suitable quality in appropriate locations to meet the expected needs for housing” (para. 27 iv). The Council will not deliver enough housing to meet anticipated need, in conflict with PPS1. Furthermore it is not consistent with Planning Policy Statement 3: ‘Housing’ when it states “The Government’s key housing policy goal is to ensure that everyone has the opportunity of living in a decent home, which they can afford, in a community where they want to live.” (para. 9). The draft Core Strategy does not propose to deliver the necessary quantity of housing to meet the need identified by DCLG forecasts regarding household projections. The proposed Core Strategy is therefore not consistent with the above national policy. The draft Core Strategy is deficient. The overall district wide housing allocation proposed in WCS1 is deficient because it does not deliver enough houses to meet an identified need. It is therefore not consistent with national policy despite evidence in the SHLAA demonstrating this to be possible. Given the absence of compelling evidence suggesting that Wealden District Council cannot meet the need for housing set out in DCLG forecasts it is considered that the presumption should be that the relevant national policy should be followed.

**Details of Changes to be Made:**

WCS1 Provision of Homes and Jobs 2006-2030 Land will be identified in subsequent Development Plan Documents for the provision of some 10585 net additional dwellings in Wealden District to provide for 15500 dwellings over the period 2006-2030.
Details of Reasons for Soundness/Legal Compliance:
The Core Strategy has emerged as the preferred strategy after substantial public consultation and after examination of a number of alternative spatial options. There remains a risk, however, that the overall housing provision figures could be successfully challenged as too low, based on evidence from Wealden District Council’s own studies of housing need and land availability. If the development provisions were to be increased there could be significant consequences for the scale and disposition of additional County Council infrastructure that would be required to deliver it. The policy’s commitment to employment land allocations which could deliver at least a moderate step change in the Wealden economy is supported. The recognition of the role that south Wealden can play in providing employment opportunities for the wider Eastbourne Hailsham ‘Triangle’ area is welcomed. Job density across East Sussex i.e. the ratio of jobs to working age population, is very low by regional and national standards, suggesting that improved job supply is required even if the working age population were to remain static. That is without compensating for the expected reduction in public sector jobs. The serious challenges facing the economy across East Sussex will require local authorities to work together to support delivery of economic regeneration.

Details of Changes to be Made:

We object to the content of the Policy as drafted on the basis that it has not been shown to be justified, effective or consistent with national policy. The target figure of 9,600 dwellings to be met within the District during the period 2006 to 2030 is significantly lower than the strategic requirement set out in the South East Plan (adopted May 2009) and fails to address identified needs.

Details of Changes to be Made:
As set out in PPS12, the CS should be prepared against the regional framework set out in the evidence base to the draft RSS. This includes having regard to, inter alia, the overall housing requirement to be met during the plan period.
Details of Reasons for Soundess/ Legal Compliance:
We wish to see the Development Boundary retained for Maresfield for the following reasons: We are not advocating major new development but wish to see further development properly controlled for the benefit of the village as a whole. The Ashdown Business Park (see para. 3.21) to the immediate west of the village has now received planning consent, and as it develops should provide considerable employment for the village. The village has relatively very good bus services in most directions (as compared with Buxted for example) which would be further enhanced. Although the village has limited facilities at present, it has all the elements of a vibrant community, primary school, church, village shop and post office. There is general support for a small number of new homes in this village (Maresfield) over and above the 80 provided for in the current non-statutory Local Plan. Almost certainly this will require some extension of a retained Development Boundary.

Details of Changes to be Made:
Yes
Sound
No
Justified
Effective
Consistent with national policy
Legally Compliant
Yes
No

We are concerned that under present proposals the essential housing needs for market and affordable housing will not be met.

Details of Changes to be Made:
### Representation ID 490

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<tr>
<th>Person ID</th>
<th>Ms Goulden</th>
<th>Agent ID</th>
<th>Mr Ide</th>
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WCS1 Provision of Homes and Jobs 2006-2030

**Policy 1**

**Sound** ☑ Yes ☐ No ☐ Justified ☑ Effective ☐ Consistent with national policy

**Legally Compliant** ☑ Yes ☐ No

**Details of Reasons for Soundess/ Legal Complaince:**
The house building total set out under the policy will not meet needs District wide. The Core Strategy will therefore not be in conformity with the South East Regional Plan, nor the evidence that supported that plan. There is also the question as to what account has been taken of the possibility that neighbouring Rother District is not able to meet its housing targets, if the Bexhill Urban Extension does not proceed with the Hastings/Bexhill link road unfunded.

**Details of Changes to be Made:**
Council to add explanatory text.

### Representation ID 594

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<thead>
<tr>
<th>Person ID</th>
<th>Mr Lloyd MP</th>
<th>Agent ID</th>
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WCS1 Provision of Homes and Jobs 2006-2030

**Policy 1**

**Sound** ☐ Yes ☐ No ☐ Justified ☐ Effective ☒ Consistent with national policy

**Legally Compliant** ☐ Yes ☐ No

**Details of Reasons for Soundess/ Legal Complaince:**
Housing/Planning Inconsistencies With regard to the overall housing numbers proposed, if the Honey Farm planning appeal Honey Farm (APP/C1435/A/10/2130580) is successful, this will increase your numbers of dwellings in the Polegate and Willingdon area to above that proposed. There is no fall back position and in housing numbers terms the Core Strategy is unsound.

**Details of Changes to be Made:**

### Representation ID 595

<table>
<thead>
<tr>
<th>Person ID</th>
<th>Mr Pursglove</th>
<th>Agent ID</th>
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WCS1 Provision of Homes and Jobs 2006-2030

**Policy 1**

**Sound** ☐ Yes ☐ No ☐ Justified ☐ Effective ☒ Consistent with national policy

**Legally Compliant** ☐ Yes ☐ No

**Details of Reasons for Soundess/ Legal Complaince:**
The need for infrastructure has not been considered in relation to, for example water supply, water/waste disposal, electricity and gas. Specific issues of the capacity of Eastbourne water works to meet water demand and odour issues at Station Road Waste Water Treatment Works. Concern regarding increase in surface water run off and flood water, and in particular concern regarding high tide and flood water at Pevensey Bay.

**Details of Changes to be Made:**
Representations ID
575

Person ID 522229 Agent ID 102504
Marting Grant Homes Mr Woolf

WCS1 Provision of Homes and Jobs 2006-2030 Policy 1

Sound  No Justified Effective Consistent with national policy
Legally Compliant Yes No

Details of Reasons for Soundness/ Legal Compliance:
We object to the content of the Policy as drafted on the basis that it has not been shown to be justified, effective or consistent with national policy. The target figure of 9,600 dwellings to be met within the District during the period 2006 to 2030 is significantly lower than the strategic requirement set out in the South East Plan (adopted May 2009) and fails to address identified needs.

Details of Changes to be Made:
As set out in PPS12, the CS should be prepared against the regional framework set out in the evidence base to the draft RSS. This includes having regard to, inter alia, the overall housing requirement to be met during the plan period.

Representations ID
578

Person ID 522174 Agent ID 522173
Blen Mr Stafford

WCS1 Provision of Homes and Jobs 2006-2030 Policy 1

Sound Yes No Justified Effective Consistent with national policy
Legally Compliant Yes No

Details of Reasons for Soundness/ Legal Compliance:
The recognition of SHLAA sites being an appropriate source of housing provision should be carried through all housing delivery policies.

Details of Changes to be Made:
Representations on behalf of Rich Tee Ltd. RPS has been instructed by Rich Tee Ltd. to make representations to Wealden District Council on the Draft Proposed Submission Core Strategy. Policy WCS1 - Distribution of Housing Growth Rich Tee Limited object to the proposed number of additional dwellings in the District up to 2030. The Regional Spatial Strategy for the South East was adopted in May 2009, and requires Wealden District Council to make provision for 11,000 new homes between 2006 and 2026. Following the formation of the Coalition Government in May 20101, the new Secretary of State for Communities and Local Government signalled the Government’s intention to abolish Regional Spatial Strategies (RSSs), and the Localism Bill currently making its way through Parliament will enact this policy. In July 2010 the Government’s Chief Planning Officer wrote to Chief Planning Officers in England setting out what can be described as the transitional guidelines that should be followed in the run up to RSSs being formally revoked. The guidelines made it clear that local planning authorities will be responsible for establishing the right level of housing provision in their area, and identifying a long-term supply of housing land without the burden of regional housing targets. Some authorities, the guidance continued, may decide to retain their existing housing targets that were set out in the revoked regional strategies, whereas others may wish to review their housing targets. The guidance also made clear however that it is important for the planning process to be transparent, and for people to be able to understand why decisions have been taken. Local authorities should therefore collect and use reliable information to justify their housing supply polices and defend them during the examination process. No such justification is given in the Proposed Submission Core Strategy for the figure of 9,600 dwellings up to 2030. Paragraph 3.11 notes that although significant numbers of housing need has been identified, other environmental, economic, social, infrastructure and community aspirations RPS emphasis have shaped the amount of growth that can be accommodated in Wealden. However, during the preparation of the RSS, Wealden District Council originally agreed to a proposal to find land for an additional 8,000 dwellings in the period between 2006 and 2026, but only on the provision that the infrastructure to support growth was in place before development took place. The Council’s concerns in respect of this matter were given a full airing at the Examination in Public (EiP) of the RSS which took place between 27 November 2006 and 30 May 2007. The Panel Report on the EiP stated that they were “unconvinced that the draft Plan figure for the Sussex Coast part of the District is the maximum that can be achieved”. They considered that there is “scope for private sector contributions towards new infrastructure in association with development and were encouraged by the partnership approach that had been adopted in the sub-region towards the co-ordination of future planning”. Accordingly, the Panel felt some increase in the sub-regional apportionment of this part of the District would be justified. In the rest of the District the Panel noted that a modest increase could be justified focused on Uckfield. Accordingly, Policy H1 of the final version of the Plan when it was adopted in May 2009 set a target of 11,000 new dwellings to be built in the District up to 2026. As the most recent figure which enjoyed, albeit briefly, development plan status, Rich Tee Ltd. consider that this figure should be retained, or at least form the basis of the District’s housing target for the Core Strategy. The figure has gone through the examination process which the revised figure of 9.600 will also have to do. There is no evidence that there has been a material change of circumstance since the RSS figure was examined and the RSS found to be sound; the Council appear to be presenting the same case for a lower figure in the Proposed Submission Core Strategy. The 11,000 figure therefore is founded on the more robust and credible evidence base of the two, and should be the target in the Core Strategy.

Details of Changes to be Made:

Yes ☑ No ☐ Justified ☑ Effective ☐ Consistent with national policy

Legally Compliant ☐ Yes ☑ No
Representation ID
599
Person ID  Mrs  Green  Agent ID
104452
WCS1 Provision of Homes and Jobs 2006-2030  Policy 1

Details of Reasons for Soundness/ Legal Compliance:
Wealden is expected to build unrealistic number of houses with many areas unavailable e.g. Ashdown Forest. Affordable housing seems to be the first essential as many lower paid people cannot afford to buy and there seems to be little or no social housing available for families especially in the country districts.

Details of Changes to be Made:

Legally Compliant  Yes  No

Representation ID
664
Person ID  Mr  Place  Agent ID
520783
WCS1 Provision of Homes and Jobs 2006-2030  Policy 1

Details of Reasons for Soundess/ Legal Compliance:
The developers on the Fairground Field have had to offer two years free rail travel to anyone who buys one of their rabbit hutches. This suggests that there is not the desperate need for so many dwellings. The hospitals and doctors can't cope with the requirments of today. Add the numbers that have been proposed and it will completly screw up their capabilities. There are now more people in the South paying ever increasing Council Tax and Road Tax yet the services that we are seeing are diminishing rapidly. The police are shrinking in numbers, our world leading health service is deteriorating rapidly, the local GPS's can't cope with the work load that they have today and you are treated like cattle if you need to go to London on the train. Local industry is more important than ever before and a closer control over immigration and imports has to be a priority. We need to tak a wider look at the resources that we have before we saturate them beyond function. With greater revenue collected by this increase in housing, perhaps more jobs could be offered by the 'over streched!, local councils, police and health servcie for which this over populated area pay for in taxes. The figures just don't add up. There are twice as many people paying council tax, there are three times more cars on the road paying road fund licence compared to the 60's yet everything is falling apart. We need to rethink where we have gone wrong before we continue to build on our mistakes. We still have the residue of an excellent country but we need to control what we are doing now before we destroy it for ever. The tidal wave of build, build, build has to stop while we still have some sends of sanity. We owe it to our children to try to preserve what we have before it is too late.

Details of Changes to be Made:
Therefore, in conclusion, it is our submission that in relation to the overall volume of house building proposed, the Proposed Submission Core Strategy is not founded on a robust and credible evidence base and has not considered reasonable alternatives. As a result the strategy adopted by the District council is not justified, is inflexible and ineffective at addressing the needs identified. The Proposed Submission Core Strategy, in particular Policy WSC1 is therefore unsound in terms of the tests in PPS12 : Local Spatial Planning (2008) (PPS12) (paragraph 4.36). To ensure the Core Strategy is sound, and in the absence of any clear and proper justification for the reduction in delivery identified by the Council, the level of housing provision required in the District and identified in Policy WSC1 should be raised to 13,200 dwellings for the period 2006-2030 that representing the figure identified in the South East Plan but extended at the same annual average rate of provision of 550 dwellings to cover the period to 2030.

Details of Changes to be Made:

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Details of Reasons for Soundess/ Legal Complaince:

Trend based projections 2006 to 2030 show an increase of 19,000 persons, which equates to around 16,800 households. WDC who commissioned the survey make a deliberate decision not to follow the recommendations of the survey and ignore their responsibility to provide adequate housing and choose to under provide by planning only 9600 dwellings between 2006 and 2030 which will surely only serve to increase the housing need to very high levels over the period. Thsi should be reviewed.

Details of Changes to be Made:

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Details of Reasons for Soundess/ Legal Complaince:

The lack of water seems to deprive many of the proposed plans for expansion of any great credibility

Details of Changes to be Made:
Employment should be addressed as a priority problem, otherwise it is likely that the whole area could become a dormitory suburb for places of work outside the area. Allowing new housing developments without possibility of employment at any of the designated sites is merely an encouragement of the ‘dormitory’ nature of the present position. The Council could stimulate and encourage starter businesses.

Details of Changes to be Made:

Details of Reasons for Soundess/ Legal Complaince:
Development would be circumscribed by the requirement of decent roads, adequate sewerage, sufficient school places and adequacy of decent social amenities (provision of playgrounds and playing fields, transport facilities and medical services.

Details of Changes to be Made:
Summary of all Representations - Proposed Submission Core Strategy Regulation 27 - Report 11th July 2011

Representation ID
773
Person ID Mr & Flittner
106034
Agent ID

WCS1 Provision of Homes and Jobs 2006-2030

Sound ☐ Yes ☑ No ☑ Justified ☑ Effective ☑ Consistent with national policy

Legally Compliant ☐ Yes ☐ No

Details of Reasons for Soundness/ Legal Complaince:

This policy is unsound and not justified for housing as the housing figures are far too low given the local and national needs for housing and population growth. The house projection figures at para 3.10 show a need for 16800 by 2030, and additionally WDC's own recent Housing Needs Survey supposedly showed a need for 14000 dwellings by 2026, let alone 2030. These figures appear to have been adjusted/fiddled by local councillor politicians for electoral reasons to come up with the proposed 9600 until 2030. Even these local housing needs surveys are suspect since they did not ask anyone not local if they were palling to move into the area so the council have no idea how many extra people would do this adding to the housing need. This is particularly relevant since any EU national can now come to this country without any restriction or limit. So how many Poles, Romanians, etc were asked if they were planning to come and live in Wealden District. Clearly none, yet it is well recorded that a net 3 million or more EU nationals have come to this country in the last 6 or 7 years. These will all add to the housing need and should be allowed for by every council to take a fair share of these extra people. The council also effectively state that as house building in Wealdon District over the last 21 years has been 400 a year, it will continue so for the next 20 despite the changed circumstances currently and looking ahead. Whilst only 400 houses have been built yearly over the last 21 years, this is because that is what the planning system has allowed. Whilst the first part of this period was covered by properly considered and adopted Local Plans that has not applied for the remaining half. The council, partly due to central government changes, has never since been capable of procuring a properly adopted local plan in the allotted time, and has managed to avoid an LPI since 1997 i.e. 14 years ago. Therefore to base the future on a false past in completely wrong. The fact of the matter is that in the last 10 or so years there has been a massive increase in net immigration compared to the 10 years preceding that. The levels of net immigration seen and continuing mean that every 3 to 4 years an extra million people are added to the population, and Wealden will have to accommodate its hare of these and allow for this to continue since most are EU nationals and no UK government has any way of limiting this. Should other countries join the EU, which is also planned during the period to 2030 it is certain even more immigration will occur. It is also the fact that life expectancy has increased significantly in recent times, meaning people live longer and so do not free up houses as they used to becuase they do not die so early. It is also a fact that more people are living singly and not as couples or families, thus meaning more individual house are needed. Thus all in all it is completely clear that the housing provision is far too low. It is a job to know what national policy is in the current political mess, with proposed changes to the planning system, yet to be enacted into law. However, assuming the aim is to give everyone a decent home to meet their needs this low level of housing provision will only make matters much worse, and do nothing to improve them, so much be against national policy. Employment land. All of the major current employment land allocations are unbuilt and being rolled into this plan. This is the Ashdown Business Park, Hackhurst Lane Industrial Estate and Polegate Business Park. these make up the vast majority of the supposed land allocation, yet they have been allocated for 15 to 20 years, and in contradiction to the council's claim that they are viable, have still yet to be build. Yet during this time a large amount of housing has been built, and even allowing farm building concersations this would indicate that most occupiers of the new houses are adding to the existing high level of our commuting, and not working locally. So whilst in theory extra land employemtn land is needed for the increased population, there seems little point in allocating extra land when such a high level of the existing allocations have yet to be built.

Details of Changes to be Made:

Housing provision should be increased to 16800 dwellings to match the needs identified in para 3.10. Whilst the council will say there is not the infrastructure for this, this is because they are the incompetent authority for the area not the competent one. They spend all their time fighting against housing development to the detriment of the homeless and poorly housed, never ever produce any of the plans required in the local plan process in the allotted time so delaying decisions massively,k so ending with disjointed and incoherent plans or decision when they are eventually made. Essentially acting in a negative regressive way. A properly competent authority that embraced extra housing development in a positive forward looking way should easily be able to come up with a sensible joined up plan for extra housing that incorporates the provision of the required infrastructure in a proper joined up way and timely way, and would produce a coherent plan in a short space of time, and providing for these extra houses would not be a problem. It is also noted that the council have to allocate broad locations for their chosen
house numbers, as detailed in para 5.9, that these figures and allocations do not include windfall sites, which have averaged 200 dwellings over the past 10 years. Whilst the rate at which these will continue to come forward can only be guessed at, but if it were to be 200 a year that would allow an extra 4000 dwellings without effecting the councils’ proposed sites. Where it to drop to 100 a year this would still be an extra 2000 dwellings in areas other than the allocated sites. This clearly shows there is plenty of scope to increase the housing provisions despite what the council may say. Equally as submitted in regard to policy WCS6 there is good reason and plenty of scope to allow a much larger rural allocation. Employment land. If the housing figures stay as proposed by the council, then the proposed extra provision should not be allocated until construction of 50% of the outstanding allocations has at least started. Unfortunately the planning system cannot make owners and developers build their business units if they consider it unviable to do so, so there is no planning way out of this problem. Equally whilst there is a demand from small business to buy their own freehold sites, a small business cannot fund the huge initial start up costs of roads, services and S106 requirements needed to get these estates going. Clearly should the housing provision be increased additional employment land will be required, but whether the existing or new land would be build out any quicker than it has been up to now will depend entirely on economics, not planning policy.
1.1 The Amount of New Housing – Policy WCS1 and WCS2 and paragraphs 5.3 etc 1.1.1 We note that the proposed Submission Core Strategy looks to accommodate 9574 new dwellings in the district across the plan period (2006 – 2030) i.e. 399 a year. This is circa 27.5% less than the 11,000 dwellings proposed across the district in the South East Plan (SEP) (May 2009) for the period 2006 and 2026. 1.1.2 PPS12 requires Core Strategies to conform generally to the regional policy. We do not consider the amount of new housing proposed in the district to be legally compliant as it is not consistent with regional policy as set out in the SEP. 1.1.3 Whilst the LPA appear to be progressing with a lower level of growth on the assumption that the SEP will be revoked by the time the Core Strategy gets to examination, the fact is the SEP remains part of the development plan at present and the CS should have regard to the aims and objectives of the SEP/ justify why it is necessary and appropriate to depart from it. The proposed Submission Core Strategy contains no such justification. 1.1.4 A detailed understanding of the background to the amount of new housing proposed in the district in the SEP is in our opinion important in considering the soundness of the housing land supply strategy now being advocated in the proposed Submission Core Strategy document. 1.1.15 The Chief Planning Officer (CPO) in his letter of the 6th July made it clear that in the context of the revocation of the RSS LPAs would be responsible for determining the housing numbers in the absence of a regional target, and that the housing numbers promoted by LPAs would need to be justified, as LPAs would need to defend them through the LDF examination process. 1.1.19 The District Council has an obligation to assess and provide for the housing needs and demands of the District. Paragraph 33 of PPS3 makes it very clear that in determining local levels of housing provision local planning authorities should, in preparing their Core Strategies take into account evidence of current and future levels of housing need and demand, e.g. as set out in Housing Market Assessment and the Housing Needs Assessment. 1.1.22 Having regard to the above we feel the DC should give consideration to the accommodation of at least 13,200 (i.e. the 11,000 set out in the SEP plus 4 x 550) to cover the additional years to 2030). Given the 4,889 units are already committed this would leave a residual requirement of 8,311 i.e. a residual requirement equivalent to 415 dwellings pa. If, 75% of the 13,200 units were on sites that generated an affordable housing need under the new policy WCS8, this level of provision could provide for circa 3,465 affordable dwellings i.e. 18% of the affordable need identified in the HNA. Which demonstrates how sever the need is relative to the supply 1.1.23 WDC’s aversion to higher housing numbers appears to be related to the effect these could have on infrastructure and services, especially in the southern part of the district. However, it is often the case that the strategic housing allocations help to address this issue, providing new transport links/highway improvements, contributing to new sustainable drainage facilities, new schools, medical facilities etc. Higher levels of growth need not prejudice existing infrastructure and services; they could in fact help address existing problems. 1.2 Housing Distribution 1.2.1 We do not consider the housing distribution strategy to be legally compliant. It is not consistent with regional policy as set out in the SEP. PPS12 requires Core Strategies to conform generally to the regional policy. Paragraph 4.33 states that choices to be made on where growth should take place should follow national and regional policy. 1.2.2 The southern part of Wealden district is located within the Sussex Coast Sub Region, one of the nine sub regions identified in the SEP. These sub regions were to be ‘the focus for growth and regeneration’. Policy SP1 of the SEP refers 1.2.3 Policy H1 of the SEP deals with regional housing provision. It stipulates that in the Sussex Coast Sub Region, 69,300 net additional dwellings should be provided between 2006 and 2026. 1.2.4 Policy SCT5 of the SEP sets out the scale and distribution of housing across the Sussex Coast sub region. It indicates that that part of Wealden District which falls within the Sussex Coast Sub Region should seek to accommodate 7000 dwellings during the plan period (2006 – 2026) i.e. 350 dwellings per annum. 1.2.5 Given the above, and having regard to the requirements of policy H1b of the SEP (wherein WDC are required to provide some 11,000 units across the district during the plan period (2006-2026)), it is clear that the SEP looks to focus growth within that part of the district that falls within the Sussex Coast Sub Region, with only a small proportion of development (4000 homes) to be accommodated within what was called the Rest of the District. 1.2.6 The SEP also makes it clear that the Sussex Coast Sub Region was identified as an area where the government was looking to proactively pursue and promote economic growth and regeneration. As a result over 60% of WDC’s housing requirement was located within the Sussex Coast Sub Region. The spatial strategy being promoted in the proposed Submission Core Strategy document is, according to paragraph 5.5.of the proposed Submission Core 493/A3/JA April 2011 Strategy document, predicated upon the strategy objectives and the settlement hierarchy. Thus only circa 51% of the...
proposed level of housing growth is to be located within what was referred to as the Sussex Coast Sub Region in the SEP. 1.2.7 Not only is the spatial strategy inconsistent with the SEP, but it fails to take on board the reason for the spatial strategy proposed in the SEP i.e. the economic regeneration of the Sussex coastal area. WDC have, in their sustainability appraisal of the proposed Submission Core Strategy Document failed to assess the implications of the spatial strategy advocated in the proposed Submission Core Strategy Document on the economic regeneration of the Sussex coastal area. The council’s failure to undertake this work means that the proposed Submission Core Strategy Document is not soundly-based. 1.2.9 In promoting an annual housing requirement of just 400 units WDC, in their proposed Submission Core Strategy document, are in our opinion actively stifling economic growth. Furthermore, the council’s decision to treat the whole district as a single entity, with no emphasis placed on the regeneration of the Sussex Coast Sub Region, is in our opinion, despite the aspirations of policies SP03, 04 and 06, actively prejudicing the economic regeneration of the coastal area, to the detriment of the wider area. 1.2.11 As currently drafted the housing distribution strategy advocated by WDC in their Proposed Submission Core Strategy is not in ‘general conformity’ with the RSS as required by Paragraph 4.2 and 4.33 of PPS12 and is not therefore sound.

Details of Changes to be Made:

3.1 The Amount of New Housing:- 3.1.1 We feel the housing targets set out in policy WCS1 should having regard to our position on the scale of housing growth be amended from 9600 to 13,200 dwellings. 3.1.2 Similarly we feel the housing targets set out in policy WCS2 of the CS should, having regard to our position on the scale of housing growth, the spatial strategy, and the level of housing proposed in Stone Cross specifically, be amended thus:- WCS2 Distribution of Housing Growth 2006 – 2030 Town/ settlement Stone Cross and Westham 42 Built or already committed - 980 New allocations; total dwellings 2006 - 2030 1,022. Total Wealden 4,889 Built or already committed; 8,311 new allocations; 13,200 Total Dwellings 2006 - 2030. 3.1.3 We would also suggest that the number of new allocations is revised to ensure that 60% of the proposed growth is located in the Sussex Coast Sub Region, as per the SEP, which should be identified on a plan. 3.1.4 Having regard to the above there would also be a need to amend policy SPO3 to address the increase in housing supply we advocate, and the reinstatement of the Sussex Coast Sub Region. Similarly paragraphs 3.11 and 3.16 would need to be revised to reflect our position, with the economic policies (SPO6 and WSC3 reviewed accordingly). 3.1.5 If the scale of housing proposed during the plan period is not revised as recommended, we would suggest that policy WCS2 is revised thus:- WCS2 Distribution of Housing Growth 2006 – 2030 Town/ settlement Stone Cross and Westham 42 Built or already committed - 850 New allocations; total dwellings 2006 - 2030 892. Total Wealden 4,889 Built or already committed; 4,835 new allocations; 9,724 Total Dwellings 2006 - 2030. 3.1.6 Given our recommended changes to the scale of growth proposed at Stone Cross and Westham we would also recommend that paragraph 6.31 (3) and paragraph 6.31 (3 bullet points 3, and 4 be amended thus:- ‘allocating a range of deliverable housing sites for up to 700 dwellings, and leisure, recreation and community facilities in Polegate and Willingdon, around 850 dwellings in Stone Cross, with some 16,890 sq. metres employment floorspace in the Polegate and Willingdon area. Sites for development will be identified and phased through the Site Allocation DPDs including: · provision of around 550 homes within an extension to the urban area of Stone Cross to the east and south east (SD6), with flexibility between SD6 and SD7, subject to highway improvements; · provision of around 300 homes within an extension to the urban area of Stone Cross to the north (SD7), with flexibility between SD6 and SD7, subject to highway improvements’
Representations ID
1196

Person ID
522212 Mr Skellorn KKH Banner Life Interest Settlement

Agent ID
522207 Mr Barker Evolution Town Planning

WCS1 Provision of Homes and Jobs 2006-2030

Policy 1

Sound
☑ Yes ☐ No ☑ Justified ☑ Effective ☑ Consistent with national policy

Legally Compliant
☑ Yes ☐ No

Details of Reasons for Soundess/ Legal Complaince:

We object to policy WCS1 as it is not in accordance with Regional Planning policy and is not sound because it is not sufficiently flexible. Policy H1 of the South East Plan adopted in 2009 states that Wealden District should deliver 11,000 homes between 2006 and 2026 at an average of 550 homes per annum. The intention of Wealden District to reduce their housing delivery to 400 homes per annum because of what is considered are infrastructure and capacity constrains is understood, however the Core Strategy must still be in general conformity with Regional Planning Policy which means that it must meet the aims of the Regional Policy. 1.2 The Regional Planning Policy is still part of the development plan. However at the present time following the High Court Judgement by Justice Lindblom of the 7 February 2011 weight can be given to the intention toabolosh the RSS (paragraph 53). The judgement make clear however (paragraph 69) that when preparing a development plan regard should still be had to the regional strategy and that development plans should still be in general conformity with the regional strategy. In respect of the Core Strategy weight must be given to the fact that the RSS has been subject to a considerable period of consultation, and a public examination. 1.3 The Core Strategy must deliver the aims of Regional Policy in order to be in general conformity. The Regional Spatial Strategy in paragraph 7.4 recognises that the South East is a high demand housing area where supply has not historically kept pace with demographic-based need and demand. Paragraph 7.5 states that affordability is a concern in rural areas in the South East, and that there is a "rural premium" for housing and that sustainable communities must be created and maintained in urban and rural areas. 1.4 To be in accordance with Regional Planning Policy the wording of the policy WCS1 should state that "at least" 9600 dwellings will be developed over the period 2006 - 2030. This would allow development to take place to better meet the aims of regional policy over the Core Strategy plan perio.d This would also be the most appropriate and flexible strategy. 1.5 this change is supported by the document published by the Planning Inspectorate call Examining Local Development Plan Documents: Learning from experience September 2009. Paragraph 14 states "Core Strategies are intended to guide development over the long term, "Planning Policy Statement 12: Local Development Frameworks, (PPS12) in paragraph 4.13 requires that the time horizon for Core Strategies should be for at least 15 years. Paragraph 4.14 states that "Core Strategies represent a considerable body or work and are intended to endure and give a degree of certainty to communities and investors. In particular they give a guide to where long term investment in infrastructure should be made. The need for frequent updating may be reduced by taking a long-term view and providing some flexibility". 1.6 The need for this flexibility is recognised in the Core Strategy in SP03 on page 22 which states "we iwll provide for at least 9600 homes". 1.7 flexibility in the Core Strategy is important and therefore a minimum housing figure would give the ability for changing circumstances to be taken into account during the lifetime of the Core Strategy and may prevent the need for updating the Core Strategy. This change would also bring the Core Strategy in fonformity with Regional Planning Policy as the core Strategy would meet the aims of the Regional Policy, and would align policy WCS1 with the Spatial objectives.

Details of Changes to be Made:
Policy WCS1 should state a "minimum" 9600 dwellings in the first paragraph
Although the Government has announced its intentions to revoke Regional Spatial Strategies, for the time being these remain part of the Development Plan. Accordingly, in producing the PSCS DPD the Council is required to have regard to, and be compliant with the South East Plan published in May 2009. The housing requirements set out in Policy H1 of the SEP has been the subject of detailed examination having regard to future housing demand in the south east region up to 2026. This identified the requirement for 11,000 new dwellings to be provided in Wealden District over the period 2006 - 2026, the equivalent of 550 dwellings per annum over a 20 year period. Without providing any sound justification, the Council has not only provided for an extended plan period which fails to comply with that of the SET, but also puts forward a substantially reduced housing requirement of 9,600 dwellings over the period 2006 - 2030 (the equivalent of 400 dwellings per annum during the 24 year period). If the SEP housing requirement were to be extended by 4 years based on its annual requirement of 550 dwellings, this would require 13,200 dwellings over an equivalent 24 year period. Thus, draft policies WCS1 and WCS2 of the PSCS DPD represent a shortfall of some 3,600 dwellings compared to the SEP housing requirement (as adjusted to cover the extended PSCS DPD plan period). While it is acknowledge that Wealden District is essentially rural in character and that it has a number of environmental constraints, these are not substantially greater than the majority of other Districts and Boroughs within the south east region. Very special justification would need to be provided for such a substantial departure from the SEP housing requirement figures given that there is a legal requirement for the two documents to be in general compliance with each other.

Details of Changes to be Made:
In order to be in compliance with the SEP in this respect, some 13,200 additional dwellings would need to be provided within the District between 2006 and 2030 with a remaining requirement for 8,311 dwellings between 2010 and 2030. Draft Policy WCS1 would need to be revised accordingly. This would however, have major ramifications for the PSCS Spatial Strategy in terms of the distribution of housing growth as currently set out in draft Policy WCS2. Indeed, it is difficult to see how the PSCS DPD could be reasonably altered in view of the fundamental nature of these representations and the only potential way forward in these circumstances would be for the Council to withdraw the document or provide detailed evidence and justification for such a substantial departure from current development plan policy, which might then provide an opportunity for such justification to be properly scrutinised as part of the LDF Examination in Public procedure.
Representation ID
1154

Person ID  Mar 533827  Person ID  Mar 328932
Agent ID  Mr Hughes 533824  Agent ID  Mr Watkins

WCS1 Provision of Policy 1 Homes and Jobs 2006-2030

Details of Reasons for Soundess/ Legal Complaince:
The Core Strategy should plan for the entire housing provision over the plan period 2006 - 2030 and should not rely on outdated and non statutory allocations or planning permissions extant at the time of search but with the potention not to be implemented. Policy should formalise these sites or areas of commitment into the document as reliance is made on their delivery to achieve housing targets. The document should also address how consistent these sites are with the strategic development areas identified in Policy WCS4.

Details of Changes to be Made:
Amend policy accordingly

Sound ☐ Yes  ☑ No  ☑ Justified  ☐ Effective  ☑ Consistent with national policy
Legally Compliant ☑ Yes  ☐ No

Details of Reasons for Soundess/ Legal Complaince:
See attached submission relating to Policy SP03. In addition land allocated for development in the eastern sections of Policy PW3 in the Non Statutory Local Plan shows land north of Dittons Road for development which could accommodate some 60 dwellings and employment floor space in addition to existing planning permissions therefore commitments should increase from (4915) to (4975) as the bulk of PW3 is treated as commitment in Policy WCS1, but the Policy ignores the eastern area which needs to be added to the commitment total.

Details of Changes to be Made:
Change WCS1 Change the figure 4685 to 7525 Change the figure 9600 to 12500
Details of Reasons for Soundess/ Legal Complaince:
The Core Strategy has emerged as the preferred strategy after substantial public consultation and after examination of a number of alternative spatial options. There remains a risk, however, that the overall housing provision figures could be successfully challenged as too low, based on evidence from Wealden District Council's own studies of housing need and land availability. If the development provisions were to be increased there could be significant consequences for the scale and disposition of additional County Council infrastructure that would be required to deliver it. The policy's commitment to employment land allocations which could deliver at least a moderate step change in the Wealden economy is supported. The recognition of the role that south Wealden can play in providing employment opportunities for the wider Eastbourne, Hailsham 'Triangle' area is welcomed. Job density across East Sussex i.e. the ratio of jobs to working age population, is very low by regional and national standards, suggesting that improved job supply is required even if the working age population were to remain static. That is without compensating for the expected reduction in public sector jobs. The serious challenges facing the economy across East Sussex will require local authorities to work together to support delivery of economic regeneration.

Details of Changes to be Made:
Details of Reasons for Soundness/ Legal Compliance:
The justification for changing the target number of dwellings for the 2006-2030 is not robust. The dismissal of the Office of National Statistics projected population and household on the basis that the trend is attributed to inward migration and therefore not a Wealden problem is unreasonable. Wealden is not an island with border controls. The Core Strategy must take due account of the clear trend projection of 16,800 additional households between 2006 - 2030. The arbitrary reduction of this trend to a figure of 9,600 based on consultation with Parish Councils and other parties who are seeking to reduce housing provisions is not the correct methodology to prepare the Core Strategy. A reduction of 42.8% on the trend projections must be fully justified. The adopted South East Plan, May 2009 examined the constraints on Wealden and the projected housing requirements and come to the conclusion that the District should accommodate an additional 11,000 dwellings within the shorter period of 2006-2027 (14,800 - 11,000) = 3,800 households, this reflecting the constraints on the district. This being a 25.7% reduction on the trend. On this basis the figure for the district for the period 2006 - 2030 should be 16,800 - 25% (16,800 - 4,318) = 12,482 (say 12,500). Not the 9,600 proposed in the Core Strategy. A figure of 12,500 households over the 24 years of the plan represents an average annual provision of 520 dwellings per year. An additional 120 dwellings per year over the 400 proposed in the proposed submission Core Strategy is not such an unreasonable figure in view of the scale of the alterations proposed and the time scale of the plan allowance in the market to recover from its current low level. A high figure for housing provision also has the advantage of creating more revenue in the form of S106 Planning Agreement funds or by way of the Community Infrastructure Levy to fund the related infrastructure. This relates particularly to the big cost items such as bypasses and improvements to water treatment works.

Details of Changes to be Made:
In the light of this submission we would like to see SP03 re written as follows: To meet the needs of the population of Wealden and for Wealden to meet its role in providing housing in the South East of England, which protection the environment, the Core Strategy will seek to provide 2,500 between 2006 and 2030. The delivery of these homes will be dependent on the delivery of developable sites and market conditions. Over the whole of the 24 plans the average provision of 520 dwellings per year will be sort and monitored. The provision of social and physical infrastructure will be as far as possible provided in conjunction with the development proposed. Funding for such provision will be sent from all sources including the housing development itself. The of the development shall be in accord with the Spatial Strategy of the...
Details of Reasons for Soundess/ Legal Complaince:

1. We note paragraph 5.3 states that the Core Strategy and subsequent DPDs will be allocating land for at least 4,685 additional dwellings over the period April 2010 – March 2030. However, Policy WCS1 (Provision of Homes and Jobs 2006 – 2030) states that land will be identified in subsequent DPDs for the provision of some 4685 net additional dwellings in Wealden District to provide for 9,600 dwellings over the period 2006 – 2030. It is considered that Policy WCS1 should reflect the wording set out in paragraph 5.3 to accommodate the possibility of more housing development coming forward, for example on windfall sites. Therefore, the wording of Policy WCS1 should read “land will be identified in subsequent DPDs for the provision of at least 4,685 net additional dwellings in Wealden”.

Details of Changes to be Made:
No
No
Effective
Justified
Consistent with national policy

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### Summary of all Representations - Proposed Submission Core Strategy Regulation 27 - Report 11th July 2011

#### Representation ID
1419

<table>
<thead>
<tr>
<th>Person ID</th>
<th>Agent ID</th>
<th>Policy 1</th>
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<tr>
<td>104179</td>
<td>339545</td>
<td>WCS1 Provision of Homes and Jobs 2006-2030</td>
</tr>
</tbody>
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#### Sound
- No
- No
- Yes
- Yes
- No
- No

#### Legally Compliant
- Yes
- No
- Yes
- Yes

#### Details of Reasons for Soundess/ Legal Complaince:

ii) Spatial Strategy Policies a) Policy WCS1: Provisions of Homes and Jobs 2006-2030 – COMMENT/OBJECT 2.7 Paragraph 3.22 of BP1: Development of the Proposed Submission Core Strategy demonstrates the quantum of development identified in the plan period has resulted from 'local needs and tested against capacities and constraints' and demonstrates that a reduction from the South East Plan figure of 11,000 dwellings to 9,600 dwellings is appropriate. Sections 5 to 8 of BP1: Development of the Proposed Submission Core Strategy detail the justification for this approach and are expressed in the CS in paragraphs 3.8 – 3.17. 2.8 However, whilst the basis for proposed Policy WCS1 has been detailed within the Evidence Base and therefore could be considered 'sound' in this regard, it has not had due regard to the South East Plan, which still forms part of the Development Plan. PPS12 identifies under Para 4.50, that as a legal requirement 'the plan conforms generally to the Regional Spatial Strategy'. 2.9 Notwithstanding the proposed intention to revoke the RSS and 'emerging' guidance contained within the 'Localism Bill', it is clear, that at this moment in time, the Core Strategy should have due regard to the requirements of the South East Plan, including the annual housing requirement from 2006 – 2010.

2.10 The overall housing requirement for Wealden as set out in the SEP (2006 – 2026) is 11,000 dwellings, which equates to 550 dwellings per annum over the 20 year plan period. Appendix 9 (p75) of BP2: Managing the Delivery of Housing, identifies that since 2006, a total of 1,332 dwellings have been completed in the District. 2.11 Table 1 below, demonstrates that against the SEP requirement since 2006, there has been ongoing failure to meet the housing requirement resulting in a current shortfall of 869 dwellings. Nevertheless, in seeking to reduce the overall housing requirement through locally derived evidence (to 9,600 dwellings), and increasing the plan period to 24 yrs (2006 to 2030) to provide an annual requirement of 400 dwellings per annum, it is evident WDC is still unable to deliver the proposed new housing requirement. Table 1 below demonstrates that even backdating the proposed Core Strategy figures to 2006, there is a current shortfall of 268 dwellings. Table 1: WDC Completions since 2006 vs SEP Requirement vs Proposed CS Requirement Year Actual Completions SEP Requirement(Surplus or Deficit) Proposed Submission Core Strategy Requirement(Surplus or Deficit) 2006/07 230 550 (- 320) 400 (-170) 2007/08 415 550 (- 135) 400 (+ 15) 2008/09 350 550 (- 200) 400 (+ 50) 2009/10 337 550 (- 213) 400 (- 63) Total 1,332 2,200 (- 868) 1,600 (- 268) 2.12 It is therefore considered, that in order to promote the delivery of housing to meet the actual local requirement as set out in the CS (9,600 dwellings), or the SEP requirement (11,000 dwellings), it is essential the CS facilitates the delivery of housing and does not seek to artificially maintain the delivery of 400 dwellings per annum or constrain the natural delivery within the District. 2.13 We have concerns with regards to WDC’s approach to windfall sites and the attempt to rely on these sites (when calculating completions) to prevent ‘over-provision’ as set out in paragraphs 10.34 – 10.36 of BP2: Managing the Delivery of Housing. 2.14 Whilst we support WDC’s approach that windfall development should not be used to project delivery (as required by PPS3), we do not consider that monitoring the delivery of high levels of windfall completions should be used as an argument to ‘slow down’ the phasing of allocated greenfield sites, as suggested in the Background Evidence and not fully explained within the Core Strategy. 2.15 This ‘preventative approach to delivery’ is at odds with the recent ‘Planning for Growth’ Ministerial Statement from Gregg Clarke MP on 23 March 2011. The statement clearly sets out the Government’s intentions for growth and reinforces the commitment to introduce ‘a strong presumption in favour of sustainable development’. The statement sets out ‘The planning system has a key role to play in this, by ensuring that the sustainable development needed to support economic growth is able to proceed as easily as possible’. The statement continues that ‘Governments clear expectation is that the answer to development and growth should, wherever possible be ‘yes’, except where this would compromise the key sustainable development principles set out in national planning policy’. 2.16 In reviewing paragraphs 10.34 – 10.36 of BP2: Managing the Delivery of Housing, we are concerned that ‘unplanned’ windfall sites could take precedence over the delivery allocated sites (and associated infrastructure), if these windfall sites are delivered in significant quantities (as historically demonstrated within Appendix 9 of BP2: Managing the Delivery of Housing). This is at odds with the Ministerial Statement which calls for ‘local planning authorities to plan positively for new development.’ 2.17 Furthermore, para 10.34 of BP2: Managing the Delivery of Housing, refers to the provisions of PPS3 and that there may be no need for ‘specific management actions’ when assessed against the delivery trajectory and an acceptable 10%–20% range. However, it is clear that the principles of the ‘Plan, Monitor, Manage’ approach as set out in paragraphs 62 – 67 of PPS3, are predicated on the basis of reacting to any ‘under-provision’ and are not intended to respond to ‘over-provision’. WDC are incorrectly applying the ‘Implementation Strategy’ Guidance
contained within PPS3 in the context of ‘over-provision’. 2.18 We therefore seek clarity over the intention of the content of paragraph 5.9 (extract below) of the CS where it identifies that ‘windfalls will be used as part of the manage and monitor system, and provide some limited contingency’. 5.9 Strategic Policy WCS2 makes no allowance for windfall sites. However over the past 10yrs around 200 dwellings per annum have been provided as windfall. Whilst the projected provision of such sites cannot be included at this stage in land supply projections, completions on these sorts of sites will count towards the overall house building totals achieved in Wealden. Windfalls will be used as part of the manage and monitor system, and provide some limited contingency. However, windfall sites can increase the demands of the District’s environmental and infrastructure constraints, and this in turn could have a determining effect on overall delivery capacity at any particular settlement. Through monitoring arrangements the Council will need to ensure that the unplanned development of windfall sites does not conflict with the strategy,’ 2.19 We seek clarity on what this ‘limited contingency’ represents, especially in the light of content of paragraphs 10.34 – 10.36 of BP2: Managing the Delivery of Housing and how the delivery of allocated sites will be reviewed in the context of windfall provision. We have noted the content of paragraph 5.17 of the CS which states: ‘5.17 The Council will, through its implementation and delivery framework and monitoring arrangements, ensure that delivery of its strategy and the overall provision of appropriate levels of growth is not prejudiced by windfalls. Further details of the management and phasing of delivery is constrained within out Background Paper 2: Managing the Delivery of Housing.’ 2.20 We therefore consider that the Background Evidence does not appear to support or relate to the content of the Core Strategy. If the approach as set out in paragraph 5.17 is the case, then why does the Background Evidence (para 10.34 – 10.36 of BP2: Managing the Delivery of Housing), or the Core Strategy (paragraphs 5.9, 5.17 and Policy WCS5 Managing the Release of Housing Land) need to have regard to the issue of ‘over-provision’ and the ‘re-phasing of sites’?

Details of Changes to be Made:

ii) Spatial Strategy Policies a) Policy WCS1: Provisions of Homes and Jobs 2006-2030 – COMMENT/OBJECT 2.7 Paragraph 3.22 of BP1: Development of the Proposed Submission Core Strategy demonstrates the quantum of development identified in the plan period has resulted from 'local needs and tested against capacities and constraints' and demonstrates that a reduction from the South East Plan figure of 11,000 dwellings to 9,600 dwellings is appropriate. Sections 5 to 8 of BP1: Development of the Proposed Submission Core Strategy detail the basis for this justification for the approach and are expressed in the CS in paragraphs 3.8 – 3.17. 2.8 However, whilst the basis for proposed Policy WCS1 has been detailed within the Evidence Base and therefore could be considered ‘sound’ in this respect, it has not had due regard to the South East Plan, which still forms part of the Development Plan.

PPS12 identifies under Para 4.50, that as a legal requirement ‘the plan conforms generally to the Regional Spatial Strategy’. 2.9 Notwithstanding the proposed intention to revoke the RSS and ‘emerging’ guidance contained within the ‘Localism Bill’, it is clear, that at this moment in time, the Core Strategy should have due regard to the requirements of the South East Plan, including the annual housing requirement from 2006 – 2010. 2.10 The overall housing requirement for Wealden as set out in the SEP (2006 – 2026) is 11,000 dwellings, which equates to 550 dwellings per annum over the 20 year plan period. Appendix 9 (p75) of BP2: Managing the Delivery of Housing, identifies that since 2006, a total of 1,332 dwellings have been completed in the District. 2.11 Table 1 below, demonstrates that against the SEP requirement since 2006, there has been ongoing failure to meet the housing requirement resulting in a current shortfall of 869 dwellings. Nevertheless, in seeking to reduce the overall housing requirement through locally derived evidence (to 9,600 dwellings), and increasing the plan period to 24 yrs (2006 to 2030) to provide an annual requirement of 400 dwellings per annum, it is evident WDC is still unable to deliver the proposed new housing requirement. Table 1 below demonstrates that even backdating the proposed Core Strategy figures to 2006, there is a current shortfall of 268 dwellings. Table 1: WDC Completions since 2006 vs SEP Requirement vs Proposed CS Requirement Year Actual Completions SEP Requirement(Surplus or Deficit) Proposed Submission Core Strategy Requirement(Surplus or Deficit) 2006/07 230 550 (- 320) 400 (-170) 2007/08 415 550 (- 135) 400 (+ 15) 2008/09 350 550 (- 200) 400 (- 50) 2009/10 337 550 (- 213) 400 (- 63) Total 1,332 2,200 (- 868) 1,600 (- 268) 2.12 It is therefore considered, that in order to promote the delivery of housing to meet the actual local requirement as set out in the CS (9,600 dwellings), or the SEP requirement (11,000 dwellings), it is essential the CS facilitates the delivery of housing and does not seek to artificially maintain the delivery of 400 dwellings per annum or constrain the natural delivery within the District. 2.13 We have concerns with regards to WDC's approach to windfall sites and the attempt to rely on these sites (when calculating completions) to prevent ‘over-provision’ as set out in paragraphs 10.34 – 10.36 of BP2: Managing the Delivery of Housing. 2.14 Whilst we support WDC's approach that windfall development should not be used to project delivery (as required by PPS3), we do not consider that monitoring the delivery of high levels of windfall completions should be used as an argument to ‘slow down’ the phasing of allocated greenfield sites, as suggested in the Background Evidence and not fully explained within the Core Strategy. 2.15 This ‘preventative approach to delivery’ is at odds with the recent ‘Planning for Growth’ Ministerial Statement from Gregg Clarke MP on 23 March 2011. The statement clearly sets out the Government’s intentions for growth and reinforces the commitment to introduce ‘a strong presumption in favour of sustainable development’. The statement sets out ‘The planning system has a key role to play in this, by ensuring that the sustainable development needed to support economic growth is able to proceed as easily as possible’. The statement continues that ‘Governments clear expectation is that the answer to development and growth should, wherever possible be ‘yes’, except where this would compromise the key sustainable development principles set out in national planning policy’. 2.16 In reviewing paragraphs 10.34 – 10.36 of BP2: Managing the
Delivery of Housing, we are concerned that ‘unplanned’ windfall sites could take precedent over the delivery allocated sites (and associated infrastructure), if these windfall sites are delivered in significant quantities (as historically demonstrated within Appendix 9 of BP2: Managing the Delivery of Housing). This is at odds with the Ministerial Statement which calls for ‘local planning authorities to plan positively for new development.’ 2.17 Furthermore, para 10.34 of BP2: Managing the Delivery of Housing, refers to the provisions of PPS3 and that there may be no need for ‘specific management actions’ when assessed against the delivery trajectory and an acceptable 10%-20% range. However, it is clear that the principles of the ‘Plan, Monitor, Manage’ approach as set out in paragraphs 62 – 67 of PPS3, are predicated on the basis of reacting to any ‘under-provision’ and are not intended to respond to ‘over-provision’. WDC are incorrectly applying the ‘Implementation Strategy’ Guidance contained within PPS3 in the context of ‘over-provision’. 2.18 We therefore seek clarity over the intention of the content of paragraph 5.9 (extract below) of the CS where it identifies that ‘windfalls will be used as part of the manage and monitor system, and provide some limited contingency’. ‘5.9 Strategic Policy WCS2 makes no allowance for windfall sites. However over the past 10yrs around 200 dwellings per annum have been provided as windfall. Whilst the projected provision of such sites cannot be included at this stage in land supply projections, completions on these sorts of sites will count towards the overall house building totals achieved in Wealden. Windfalls will be used as part of the manage and monitor system, and provide some limited contingency. However, windfall sites can increase the demands of the District’s environmental and infrastructure constraints, and this in turn could have a determining effect on overall delivery capacity at any particular settlement. Through monitoring arrangements the Council will need to ensure that the unplanned development of windfall sites does not conflict with the strategy,’ 2.19 We seek clarity on what this ‘limited contingency’ represents, especially in the light of content of paragraphs 10.34 – 10.36 of BP2: Managing the Delivery of Housing and how the delivery of allocated sites will be reviewed in the context of windfall provision. We have noted the content of paragraph 5.17 of the CS which states: ‘5.17 The Council will, through its implementation and delivery framework and monitoring arrangements, ensure that delivery of its strategy and the overall provision of appropriate levels of growth is not prejudiced by windfalls. Further details of the management and phasing of delivery is constrained within out Background Paper 2: Managing the Delivery of Housing.’ 2.20 We therefore consider that the Background Evidence does not appear to support or relate to the content of the Core Strategy. If the approach as set out in paragraph 5.17 is the case, then why does the Background Evidence (para 10.34 – 10.36 of BP2: Managing the Delivery of Housing), or the Core Strategy (paragraphs 5.9, 5.17 and Policy WCS5 Managing the Release of Housing Land) need to have regard to the issue of ‘over-provision’ and the ‘re-phasing of sites’? 

### Details of Changes to be Made:

- It is unclear within the Proposed Submission document as to what the overall housing requirement is based upon (i.e. South East Plan, Option 1. Locally Generated housing required?) For example paragraph 5.3 and Policy WCS1 gives a total number of dwellings to be built within the District for the period 2006 - 2030 but do not indicate where the total has been derived from. Although it is assumed this is the South East Plan requirement, this could do with being made clearer.

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**Representation ID**

1398

**Person ID**  Mr. Marsh  **Agent ID**  Mid Sussex District Council

**Sound**  Yes  **Legally Compliant**  Yes

**Details of Reasons for Soundess/ Legal Complaince:**

It is unclear within the Proposed Submission document as to what the overall housing requirement is based upon (i.e. South East Plan, Option 1. Locally Generated housing required?) For example paragraph 5.3 and Policy WCS1 gives a total number of dwellings to be built within the District for the period 2006 - 2030 but do not indicate where the total has been derived from. Although it is assumed this is the South East Plan requirement, this could do with being made clearer.

**Details of Changes to be Made:**
We are intrigued by the Council’s intended adoption of an unsound housing position. The Council’s proposals for the provision of housing development during the period 2006 – 2030 demonstrate that the Council’s Local Development Framework Document is not in conformity with the Regional Spatial Strategy, which forms part of the Development Plan. Paragraph 3.3 of the Council’s Background Paper no. 1 (BP1) states “Current legislation requires that the Core Strategy is in general conformity with the Regional Spatial Strategy, the South East Plan” (SEP), which was adopted in May 2009. In paragraph 3.3 of BP1, the Council also acknowledge that “The South East Plan requires that at least 11,000 dwellings is provided in Wealden District between 2006 and 2026”. The SEP (Policy H1) requires 11,000 new dwellings to be provided in Wealden District between 2006 and 2026, equal to an overall annual requirement of 550 per year. Paragraph 3.3 of the Council’s BP1 states “Because of existing planning permissions and houses that have already been built since 2006, overall we need to find locations for a total of approximately 7,000 new houses between now and 2026”. Assuming 550 dwellings per year based on the SEP housing requirement, extending the PSCS DPD end date to 2030 (i.e. 4 more years) would require an additional 2,200 dwellings, bringing this total to the equivalent of 9,200 dwellings between 2006 and 2030. Policy WCS2 indicates that 4,889 dwellings are already committed (through planning permissions, commencements etc.) as at 1st April 2010. Set against the SEP requirement, this would leave a residual requirement for 6,111 dwellings up to 2026 (i.e. 11,000 minus 4,889) and if the SEP requirement were to be extended by 4 years up to 2030 (at 550 dwellings per year i.e. a total of 2,200 dwellings), this would create a total residual requirement of 8,311 additional dwellings by 2030. This residual requirement is the equivalent of 415 dwellings per annum during the remaining 20 year period between April 2010 and April 2030. By contrast, draft Policy WCS1 provides for a total provision of 9,600 dwellings between 2006 and 2030. Taking account of 4,889 dwelling commitments, this leaves only 4,685 new dwellings during the remaining 20 year period. This is the equivalent of only 230 dwellings per year (i.e. just over half that implied by extending the annual housing requirement set out in Policy H1 of the SEP to 2030). In draft Policy WCS2, the 9,600 dwelling figure referred to in draft Policy WCS1 has a total of 9,574 dwellings during the same 2006 – 2030 time period. The Council has not provided any justification for failing to comply with the housing requirements set out in SEP and no justification has been provided as to how the seemingly speculative figure of 9,600 dwellings or 9,574 dwellings has been arrived at for the housing requirement during the period 2006 – 2030 in draft Policies WCS1 and WCS2. As the council are aware there have been a number of recent announcements regarding the emerging Localism Bill and the changes being sought by the Government and we have looked to deal with these within our comments. As the Council is aware, Section 19 of the Planning and Compulsory Purchase Act 2004 (as amended) deals with the Preparation of local development documents. Section 19(2) specifically states that: “In preparing a Development Plan Document or any other local development document the local planning authority must have regard to (a) national policies and advice contained in guidance issued by the Secretary of State; (b) the RSS for the region in which the area of the authority is situated, if the area is outside Greater London”; (h) any other local development document which has been adopted by the authority”. The adopted South East Plan therefore remains part of the development plan and whatever the Council believes cannot be used as a reason for not complying with 19(2)(b) as this is a statutory requirement. This is particularly true bearing in mind recent appeal decisions, which confirm the status of the RSS’s and the limited weight that can be attributed at this time to the emerging Localism Bill. Accordingly any DPD that appears prior to enactment of the Localism Bill which materially departs from the RSS must be found unsound given that it would not comply with statute, particularly given the Governments recent announcement that an Environmental Assessment will now be carried out to consider the removal of the RSS’s. By any reasonable standard, this is likely to take a long period of time and it is therefore fair to assume the RSS’s will remain as part of the development plan for a good period to come. Nonetheless, even ignoring the above the Government remains committed to the delivery of more housing and it therefore seems perverse for the council to be attempting to adopt a strategy which seeks to reduce what should be recognised at the very least, as a minimum housing requirement. It is clear from all the above therefore that the RSS remains in law as part of the development plan and cannot be ignored, as the council appears to be seeking to do. We also refer the council back to the founding principles of the emerging local development framework. For example PPS 12 confirms that the Core Strategies; “4.36 Core strategies must be justifiable: they must be: • founded on a robust and credible evidence base; and • the most appropriate strategy when considered against the reasonable alternatives”. We
Summary of all Representations - Proposed Submission Core Strategy Regulation 27 - Report 11th July 2011

question whether the council's unjustified Housing Growth figures meet this simple test as presently emerging and we maintain therefore that the Councils emerging Core Strategy is not only deficient because it ignores the adopted RSS, but it also not founded on the most up to date evidence base. Perhaps, however most importantly we draw the council's attention to the evidence base it has at its disposal and indeed comments it makes in supporting documents for this Core Strategy. Paragraph 5.3 of the “Managing the Delivery of Housing Background Paper” – Background Paper 2 notes that “the Councils Housing Needs Assessment highlights the acute level of affordable housing need within the District and it is noted that the main means of achieving affordable housing delivery is by the means of the construction of market housing…” Paragraph 6.11 of the same document goes onto confirm that “on this basis, the assessment has identified an annual affordable housing need of 812 in Wealden”. On the basis that the delivery of affordable housing, as accepted by the Council is predicated on the delivery of market accommodation, the evidence supports a much higher level of growth than that envisaged by paragraphs 3.8 – 3.17 and more importantly policies WCS1 and WCS2 of the consultation document. Indeed, it is obvious from the above that a target of 4,685 new homes over the period 2006 – 2026 is neither robust or indeed accurate and would continue to exacerbate the ongoing chronic housing deficiencies in the district. Furthermore, paragraph 3.22 of BP1 is of course, wholly misleading as it compares housing target figures that relate to two different time periods. The 11,000 dwellings target relates to the housing requirement set out in SEP between the period 2006 and 2026 (i.e. equal to 550 dwellings per annum), whereas the Council’s reduced figure of 9,600 dwellings relates to an extended 4 year period between 2006 – 2030 which would be the equivalent of 400 dwellings per annum (i.e. a reduction of 150 dwellings per annum over the entire Plan period compared to the SEP). Thus, not only is the PCSD DPD not legally compliant in failing to be in accordance with the Development Plan (or its time period), but also it is not sound, as no satisfactory justification has been provided for the substantial reduction in the housing period and over an extended plan period. Moreover, no justification has been made as to why the council fails to take on board the evidence which clearly supports a higher housing provision than that proposed within the adopted RSS, particularly taking on board the Governments growth agenda.

Details of Changes to be Made:

We therefore suggest that the submitted Core strategy needs to be amended to take into the account the extant development plan, including the South East Plan’s housing target at the very least, but with a recognition for a higher level of growth should be planned for. At the very least therefore, there needs to be a larger degree of flexibility built into the document. Whilst the Council has within paragraphs 5.18 – 5.20, as well as policy WCS5 sought to provide a contingency within the document, this does not go far enough and needs to be far more robust to take account, as indentified above of the chronic affordable housing issues that exist within the District.
Effective Justified □ Yes □ No □ Consistent with national policy
Legally Compliant □ Yes □ No

Details of Reasons for Soundess/ Legal Complaince:

3.1 The Core Strategy is unsound because, the proposed provision of 9,600 new homes from 2006-2030, in policy WCS1 – Provision of Homes and Jobs 2006-2030, is inconsistent with national policy in Planning Policy Statement (PPS) 3: Housing. 3.2 PPS3 requires the level of housing provision to be determined through, “a strategic, evidence-based approach that takes into account relevant local, sub-regional, regional and national policies and strategies achieved through widespread collaboration with stakeholders.” (paragraph 32). Despite the Government’s intention to revoke Regional Strategies they remain part of the development plan (Cala 1). The Cala 2 judgment (7 February 2011) found that the intention to revoke Regional Strategies is a material consideration but that with regard plan making, "While Regional Strategies subsist a local planning authority will have to make sure to discharge its duty to achieve general conformity with them". 3.3 The South East Plan requires the provision of 11,000 new dwellings within Wealden district over the period 2006 - 2026 (550/annum). This is split between the 'Sussex Coast' sub-region, covering the southern parishes (350/annum), and 'rest of Wealden' area covering the northern parishes (200/annum). 3.4 In paragraph 8.67 of the background paper 1 (BP1) Development of the Proposed Submission Core Strategy the council highlights that the Core Strategy was reviewed without the framework of the South East Plan. The council subsequently revised the housing targets without reference to the South East Plan or the strong and tested evidence that supported it. This approach is not sound. The role of housing in driving growth 3.5 The Government is committed to increasing the supply of housing as outlined in the white paper Local growth: realising every place’s potential (28 October 2010). This emphasises, "Housing can be an important source of economic growth” (Box 3.B) and that house building can help wider economic recovery. Indeed the government is committed to creating a framework of powerful incentives for local authorities to deliver housing including, “the New Homes Bonus scheme, starting in 2011-12, will provide a simple, powerful and transparent incentive for local authorities to support new housing development”. 3.6 The Government has identified the need, “to provide sufficient housing to meet demand” (paragraph 3.1) as one of the main functions of the planning system. The white paper outlines the role of local authorities in supporting growth and their responsibility to, “ensure a responsive supply of land that supports business growth and increases housing supply” (Box 2.A). Reducing the level of housing provision is therefore inconsistent with national policy unless there is clear new evidence, in respect of matters such as need, harm and economic implications, to justify that position. We have seen no new evidence to this effect. Need and potential to increase the level of housing provision 3.7 Policy WCS1 does not represent the most appropriate strategy when considered against the reasonable alternatives. WCS1 should provide 11,000 new homes and should be reworded: "Land will be identified in subsequent Development Plan Documents for the provision of some 4685 6,111 net additional dwellings in Wealden District to provide for 9600 11,000 dwellings over the period 2006-2030…” 3.8 Government population and household projections show a significant demand for housing within Wealden. Between 2006 and 2027 it is projected that the population in Wealden will increase by 16,200 persons and households will increase by 14,800. By 2030 the increase is projected to be 16,800 households and 19,200 persons. 3.9 This shows the demand for both market and affordable housing is high and the provision of 400dpa (9,600 new dwellings) will only meet the housing demands of 60% of households in 2030. Given that the capacity of the area to achieve higher growth has been tested and demonstrated it is clear that Policy WCS1 is not the most appropriate strategy and that a higher level of housing provision should be made. Ageing population, in-migration, maintaining viable services and a vibrant economy 3.10 There are around 62,000 households in the district. When considered against the national average, a much smaller proportion of the population falls within the 15-39 age range and a significantly high proportion of the population falls within the pensionable age group. Further, on average over the last six years, there has been a net gain of 600 persons per year from migration (paragraph 3.9, Core Strategy), including those of working age. 3.11 Without intervention, by increasing housing provision to help meet the demands for in-migration, the proportion of the population over 75 years will increase and, inevitably, in the short-medium term younger households will be forced out of the local housing market (exacerbating the situation), in the longer term the population will be in decline. As a consequence, the district’s economy and retail viability will suffer significantly as will its social health and cohesion, including investment in and support for community services and facilities. Need for affordable housing 3.12 Core Strategy paragraph 2.17 states, “the need to provide affordable housing stock remains a priority for the Council”. The Core Strategy Sustainability Appraisal Scoping Report states that the
current need for affordable housing is 16 times greater than the rate of supply. 3.13 According to BP2: Managing the Delivery of Housing there are some 2,161 households on the district's housing register requiring affordable housing. BP1 highlights that the, “Council's Housing Needs Assessment (January 2010) identified 1,215 households in current need (gross), based on survey responses. The Housing Needs Assessment estimates that the annual (net) need for affordable housing in Wealden is 812dpa over a five year period, which equates to 4,060 dwellings." (paragraph 5.14) 3.14 BP2 also highlights, “8,611 houses would be needed from the date of assessment" (paragraph 5.14). Although “This is clearly not deliverable or practicable in the light of capacity to accommodate growth, especially environmental and infrastructure constraints”. There is clearly an acute need for affordable housing in the district. Historic rates of delivery 3.15 Core Strategy paragraph 5.13 states, “Over the last 21 years on average 400 dwellings have been built per annum across the District. Based on this delivery rate, and the spatial strategy with focus of significant development in Uckfield, Hailsham and Heallingly, Polegate and Willingdon and Stone Cross, it is considered that a similar rate in the future is achievable.” The council considers that the proposed provision of 400dpa, “will help to ensure integration of development into existing communities, provides a realistic rate for the market to deliver, allows for master planning of large sites and the timely provision of infrastructure. The following trajectory sets out what has been achieved in Wealden from 2006 to date and our forecast of future housing delivery until 2030." Continuing the historic rate of housing delivery is inappropriate given the considerable need for housing. The proposed rate should be significantly increased to meet housing demands. Land available for housing 3.16 The SHLAA demonstrates that there is plenty of capacity at “suitable” sites to accommodate an increase in the level of housing provision. BP1 reveals that the, “assessment identified land considered to be suitable, available and achievable for some 22,755 homes, including current commitments.”

Details of Changes to be Made:
3.7 Policy WCS1 does not represent the most appropriate strategy when considered against the reasonable alternatives. WCS1 should provide 11,000 new homes and should be reworded: “Land will be identified in subsequent Development Plan Documents for the provision of some 4685 6,111 net additional dwellings in Wealden District to provide for 9600 11,000 dwellings over the period 2006-2030...”
We are intrigued by the Council's intended adoption of an unsound housing position. The Council's proposals for the provision of housing development during the period 2006 – 2030 demonstrate that the Council's Local Development Framework Document is not in conformity with the Regional Spatial Strategy, which forms part of the Development Plan. Paragraph 3.3 of the Council's Background Paper no. 1 (BP1) states “Current legislation requires that the Core Strategy is in general conformity with the Regional Spatial Strategy, the South East Plan” (SEP), which was adopted in May 2009. In paragraph 3.3 of BP1, the Council also acknowledge that “The South East Plan requires that at least 11,000 dwellings is provided in Wealden District between 2006 and 2026”. The SEP (Policy H1) requires 11,000 new dwellings to be provided in Wealden District between 2006 and 2026, equal to an overall annual requirement of 550 per year. Paragraph 3.3 of the Council's BP1 states “Because of existing planning permissions and houses that have already been built since 2006, overall we need to find locations for a total of approximately 7,000 new houses between now and 2026”. Assuming 550 dwellings per year based on the SEP housing requirement, extending the PSCS DPD end date to 2030 (i.e. 4 more years) would require an additional 2,200 dwellings, bringing this total to the equivalent of 9,200 dwellings between 2006 and 2030. Policy WCS2 indicates that 4,889 dwellings are already committed (through planning permissions, commencements etc.) as at 1st April 2010. Set against the SEP requirement, this would leave a residual requirement for 6,111 dwellings up to 2026 (i.e. 11,000 minus 4,889) and if the SEP requirement were to be extended by 4 years up to 2030 (at 550 dwellings per year i.e. a total of 2,200 dwellings), this would create a total residual requirement of 8,311 additional dwellings by 2030. This residual requirement is the equivalent of 415 dwellings per annum during the remaining 20 year period between April 2010 and April 2030. By contrast, draft Policy WCS1 provides for a total provision of 9,600 dwellings between 2006 and 2030. Taking account of 4,889 dwelling commitments, this leaves only 4,711 new dwellings during the remaining 20 year period. This is the equivalent of only 230 dwellings per year (i.e. just over half that implied by extending the annual housing requirement set out in Policy H1 of the SEP to 2030). In draft Policy WCS2, the 9,600 dwelling figure referred to in draft Policy WCS1 has a total of 9,574 dwellings during the same 2006 – 2030 time period. The Council has not provided any justification for failing to comply with the housing requirements set out in SEP and no justification has been provided as to how the seemingly speculative figure of 9,600 dwellings or 9,574 dwellings has been arrived at for the housing requirement during the period 2006 – 2030 in draft Policies WCS1 and WCS2. As the council are aware there have been a number of recent announcements regarding the emerging Localism Bill and the changes being sought by the Government and we have looked to deal with these within our comments. As the Council is aware, Section 19 of the Planning and Compulsory Purchase Act 2004 (as amended) deals with the Preparation of local development documents. Section 19(2) specifically states that: “In preparing a Development Plan Document or any other local development document the local planning authority must have regard to (a) national policies and advice contained in guidance issued by the Secretary of State; (b) the RSS for the region in which the area of the authority is situated, if the area is outside Greater London”; (h) any other local development document which has been adopted by the authority”. The adopted South East Plan therefore remains part of the development plan and whatever the Council believes cannot be used as a reason for not complying with 19(2)(b) as this is a statutory requirement. This is particularly true bearing in mind recent appeal decisions, which confirm the status of the RSS’s and the limited weight that can be attributed at this time to the emerging Localism Bill. Accordingly any DPD that appears prior to enactment of the Localism Bill which materially departs from the RSS must be found unsound given that it would not comply with statute, particularly given the Governments recent announcement that an Environmental Assessment will now be carried out to consider the removal of the RSS’s. By any reasonable standard, this is likely to take a long period of time and it is therefore fair to assume the RSS’s will remain as part of the development plan for a good period to come. Nonetheless, even ignoring the above the Government remains committed to the delivery of more housing and it therefore seems perverse for the council to be attempting to adopt a strategy which seeks to reduce what should be recognised at the very least, as a minimum housing requirement. It is clear from all the above therefore that the RSS remains in law as part of the development plan and cannot be ignored, as the council appears to be seeking to do. We also refer the council back to the founding principles of the emerging local development framework. For example PPS 12 confirms that the Core Strategies; “4.36 Core strategies must be justifiable: they must be: • founded on a robust and credible evidence base; and • the most appropriate strategy when considered against the reasonable alternatives”. We
question whether the council’s unjustified Housing Growth figures meet this simple test as presently emerging and we maintain therefore that the Council’s emerging Core Strategy is not only deficient because it ignores the adopted RSS, but it also is not founded on the most up to date evidence base. Perhaps, however most importantly we draw the council’s attention to the evidence base it has at its disposal and indeed comments it makes in supporting documents for this Core Strategy. Paragraph 5.3 of the “Managing the Delivery of Housing Background Paper” – Background Paper 2 notes that “the Council’s Housing Needs Assessment highlights the acute level of affordable housing need within the District and it is noted that the main means of achieving affordable housing delivery is by the means of the construction of market housing...” Paragraph 6.11 of the same document goes onto confirm that “on this basis, the assessment has identified an annual affordable housing need of 812 in Wealden”. On the basis that the delivery of affordable housing, as accepted by the Council is predicated on the delivery of market accommodation, the evidence supports a much higher level of growth than that envisaged by paragraphs 3.8 – 3.17 and more importantly policies WCS1 and WCS2 of the consultation document. Indeed, it is obvious from the above that a target of 4,685 new homes over the period 2006 – 2026 is neither robust or indeed accurate and would continue to exacerbate the ongoing chronic housing deficiencies in the district. Furthermore, paragraph 3.22 of BP1 is of course, wholly misleading as it compares housing target figures that relate to two different time periods. The 11,000 dwellings target relates to the housing requirement set out in SEP between the period 2006 and 2026 (i.e. equal to 550 dwellings per annum), whereas the Council’s reduced figure of 9,600 dwellings relates to an extended 4 year period between 2006 – 2030 which would be the equivalent of 400 dwellings per annum (i.e. a reduction of 150 dwellings per annum over the entire Plan period compared to the SEP). Thus, not only is the PSCS DPD not legally compliant in failing to be in accordance with the Development Plan (or its time period), but also it is not sound, as no satisfactory justification has been provided for the substantial reduction in the housing period and over an extended plan period. Moreover, no justification has been made as to why the council fails to take on board the evidence which clearly supports a higher housing provision than that proposed within the adopted RSS, particularly taking on board the Governments growth agenda.

**Details of Changes to be Made:**

We therefore suggest that the submitted Core strategy needs to be amended to take into the account the extant development plan, including the South East Plan’s housing target at the very least, but with a recognition for a higher level of growth should be planned for. At the very least therefore, there needs to be a larger degree of flexibility built into the document. Whilst the Council has within paragraphs 5.18 – 5.20, as well as policy WCS5 sought to provide a contingency within the document, this does not go far enough and needs to be far more robust to take account, as indentified above of the chronic affordable housing issues that exist within the District.

**Details of Reasons for Soundness/ Legal Complaince:**

1 The Council states that the Core Strategy intends that a total of around 9,600 dwellings will be created in the period 2006 to 2030. This is made up as follows: Houses already built (to April 2010) 1331 Existing commitments 3558 Proposed Additional Housing 4685 TOTAL 9579 2 Paragraph 3.10 of the Proposed Submission Core Strategy states that the Council expects the population of the district to increase between 2006 and 2030 by approximately 19,000, which represents 16,800 households. It is clear therefore that the number of new households likely to be created in the district over the plan period will be far in excess of the number of new dwellings planned. Even if all of the new dwellings proposed are delivered this will only meet the needs of 57% of the expected new households. Well over 7,000 households will remain in housing need. 3 On this basis the Core Strategy is unsound because the numbers of dwellings proposed to be delivered does not properly reflect the expected housing need. A larger number of dwellings should be planned for in Policy WCS1 to redress the shortfall in District-wide housing allocations. The total should be closer to the number of new households expected to be created over the plan period.

**Details of Changes to be Made:**

The total number of dwellings to be provided should be increased, with significantly more housing development being identified in the north of the District where the market is stronger and a known need for housing exists.

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**Representation ID**

1455

<table>
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<tr>
<th>Person ID</th>
<th>Nightingale</th>
<th>Agent ID</th>
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<tr>
<td>332748</td>
<td>Millwood Designer Homes</td>
<td>102571</td>
<td>Kember Loudon Williams</td>
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**WCS1 Provision of Homes and Jobs 2006-2030**

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<th>No</th>
<th>Justified</th>
<th>Effective</th>
<th>Consistent with national policy</th>
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**Legally Compliant**

Yes | No

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**Page 457 of 1511**
Details of Reasons for Soundness/ Legal Compliance:

The Number of Dwelling Proposed to be delivered. (Paragraphs 3.8 – 3.17, Policy WCS1) 1 The Council states that the Core Strategy intends that a total of around 9,600 dwellings will be created in the period 2006 to 2030. This is made up as follows: Houses already build (to April 2010) 1331 Existing commitments 3558 Proposed Additional Housing 4685 Total 9579

Details of Changes to be Made:

2 Paragraph 3.10 of the Proposed Submission Core Strategy states that the Council expects the population of the District to increase between 2006 and 2030 by approximately 19,000, which represents 16,800 households. It is clear therefore that the number of new households likely to be created in the district over the plan period will be far in excess of the number of new dwellings planned. Even if all of the new dwellings proposed are delivered this will only meet the needs of 57% of the expected new households. Well over 7,000 households will remain in housing need.
I note that the overall figure for housing development in the District has been limited to 9,574 dwellings over the period from 2006-2030. I do not believe that this figure has been justified in relation to the available evidence. National Planning policy is set out in Planning Policy Statement 3 (Housing) dated June 2010. This document is a revision of an earlier document published in 2006. On coming to power, the coalition government altered Planning Policy Statement 3, excluding land within the curtilage of a dwellinghouse from the definition of brownfield land. The reference to 30dph as the general density target was also deleted. No other alterations were made. The Governments key housing policy goal in Planning Policy Statement 3 is to ensure that everyone has the opportunity of living in a decent home, which they can afford, in a community where they want to live. A wide choice of home, improving affordability and creating sustainable, inclusive, mixed communities in both rural and urban areas are the stated means of achieving this. Housing targets have been a way of assessing and disaggregating housing need to local level. Regional housing targets have been set via the South East Plan. This plan took many years to reach completion, and was progressed through a number of detailed processes including evidence gathering, consultation and testing within a Examination in Public. The South East Plan remains part of the development plan for South East England. The Regional Spatial Strategy, the South East Plan, sets a target for Wealden District of 11,000 new homes to 2026 (20 years), four years shorter than the Core Strategy plan period; 550 per annum. The District Council proposes 9574 to 2030 (over 24 years); 399 per annum. Although the Coalition Government has indicated its intention to abolish regional strategies, the plan remains extant until its replacement, the Localism Bill, has completed its process through parliament and is on the statute books. The courts and the Planning Inspectorate have commented on the weight that should be afforded the South East Plan, and to date, it remains part of the development plan. National planning policy continues to refer to the strategic role of regional bodies and plan-making. Appeal decisions continue to give the regional strategy considerable weight in planning decisions. It is my view that any Council must have strong evidence to deviate significantly from the housing targets set out in the Regional Spatial Strategy. I do not believe that Wealden District Council has presented sufficient evidence to justify a figure of 399 dwellings per annum (9,574 over 24 years), over the South East Plan target of 550 dwellings per annum. I believe that the South East Plan represents a robust and credible evidence base and can justify the need to deliver, in Wealden District, 550 dwellings per annum to meet local needs. Any Council wishing to deviate from this figure would require very robust evidence to do so. I do not believe that the Proposed Submission Core Strategy presents such evidence. The District Council’s own evidence for housing growth points to a need for higher levels of housebuilding. The District Council has helpfully published ONS housing projections for the period to 2030, which matches the Core Strategy plan period. It is estimated that the population will rise by 16,800 households over the same period. Although this is based largely on falling household size and in-migration (rather than natural change) it is acknowledged that maintaining population levels is necessary for the economic health of the area. The District Council housing target falls significantly short of the projected household, failing to meet demand, and need, for housing. This will have severe economic consequences. By restricting housing growth, businesses will be limited in a flexible workforce, house prices will further affect affordability and the acknowledged problems in the district will be compounded. The Council has published its Housing Needs Survey. This has identified a housing need of 812 affordable dwellings per annum. This greatly exceeds the total projected growth figure in the Proposed Submission Core Strategy of 399 dwellings per annum (9574 divided by 24 years plan period). Although it cannot be realistically expected to meet 100% affordable housing needs in a district that is constrained by other factors, by severely restricting the levels of housing growth, the District Council builds in failure to meet affordable housing needs. It is acknowledged in the Proposed Submission Core Strategy that affordable housing will largely be delivered in the main by market housing development. The District Council has a poor record of delivering affordable housing through rural exceptions policy, and despite community agreement to retain the policy, very few units have been delivered this way over the previous Local Plan period, whilst the problem remains as acute as ever. The District Council’s Strategic Housing Land Availability Assessment (SHLAA) demonstrated that suitable land was available to deliver 18,257 dwellings. Additionally, the Strategic Housing Market Assessment (SHMA) demonstrated that the market was sufficiently buoyant in many parts of the district to accommodate higher levels of housebuilding. I recognise the limitations placed on housing growth by environmental and infrastructure constraints. However these constraints affect limited parts of the district, and can be overcome by an alternative distribution strategy. I will
discuss this in more detail below, but it is my opinion that the District Council has not applied its evidence to alternative strategies that overcome the limitations placed on growth. It is my submission that in relation to the overall volume of housebuilding proposed, the Proposed Submission Core Strategy is not founded on a robust and credible evidence base and has not considered reasonable alternatives. The result of a restricted level of housebuilding the Council will fail to deliver affordable housing to meet local need. The restriction in housebuilding levels and the removal of development boundaries in many locations will result in inflexibility in delivery. The questions raised by the infrastructure constraints of waste water treatment and transport have not resulted in an alternative strategy, should this situation not be resolved. As a result the strategy adopted by the District Council is inflexible and ineffective at addressing the needs identified. Finally, as a direct result of my comments above, it is my opinion that the Proposed Submission Core Strategy is not in conformity with PPS3 or PPS1. The plans will not result in ‘sustainable, inclusive, mixed communities in all areas, both urban and rural’ (paragraph 9 PPS3). The Proposed Submission Core Strategy, in particular Policy WSC1 is there unsound in terms of the tests in Planning Policy Statement 12.

Details of Changes to be Made:
The South East Plan remains the Regional Spatial Strategy for the south east. PPS3 refers directly with the need for local planning authorities to meet the target for house building and employment provision within the region. In order to be consistent with National Policy, the Submission Core Strategy should allocate land for 550 new dwellings p.a. in Wealden District. The 24 year plan period of the Submission Core Strategy should therefore provide for 13,200 dwellings. This would provide the balance between protecting the environment and rural character of the district, providing for the social and economic infrastructure of the district and provide for the expected level of household growth in the district. WSC1 should therefore be worded Land will be identified in subsequent development plan documents for the provision of some 8311 net additional dwellings in Wealden District to provide for 13,200 dwellings over the period 2006-2030.
Details of Reasons for Soundness/ Legal Complaince:
The total amount of housing proposed by the draft Core Strategy is insufficient. DCLG household projections demonstrate that by 2030 there will be approximately 76,000 households in Wealden, an anticipated increase of around 15,500 households between 2006 and 2030. The Council states that they are unable to meet the need for housing yet do not submit any compelling evidence of this. They aim to meet approximately 57% by delivering 9600 dwellings by 2030. This equates to a shortfall in housing of approximately 5900 dwellings. In this respect the Core Strategy conflicts with its evidence base. The Strategic Housing Land Availability Assessment Report (March 2010) identifies a supply of suitable sites that are currently outside of the planning process capable of delivering a total of 18257 dwellings in the period between 2009 and 2026. The SHLAA demonstrates that the Council is capable of delivering enough housing to meet the need identified by DCLG projections therefore it is submitted that that the Core Strategy is not ‘justified’ as it fails to take account of its evidence base therefore it is ‘unsound’.

The draft Core Strategy is not consistent with Planning Policy Statement 1: ‘Delivering Sustainable Development’ where it states that “In preparing development plans, planning authorities should seek to bring forward sufficient land of a suitable quality in appropriate locations to meet the expected needs for housing” (para. 27 iv). The Council will not deliver enough housing to meet anticipated need, in conflict with PPS1. Furthermore it is not consistent with Planning Policy Statement 3: ‘Housing’ when it states “The Government’s key housing policy goal is to ensure that everyone has the opportunity of living in a decent home, which they can afford, in a community where they want to live.” (para. 9). The draft Core Strategy does not propose to deliver the necessary quantity of housing to meet the need indentified by DCLG forecasts regarding household projections. The proposed Core Strategy is therefore not consistent with the above national policy. The draft Core Strategy is deficient. The overall district wide housing allocation proposed in WCS1 is deficient because it does not deliver enough houses to meet an identified need. It is therefore not consistent with national policy despite evidence in the SHLAA demonstrating this to be possible. Given the absence of compelling evidence suggesting that Wealden District Council cannot meet the need for housing set out in DCLG forecasts it is considered that the presumption should be that the relevant national policy should be followed.

Details of Changes to be Made:
WCS1 Provision of Homes and Jobs 2006-2030 Land will be identified in subsequent Development Plan Documents for the provision of some 10585 net additional dwellings in Wealden District to provide for 15500 dwellings over the period 2006-2030.
Details of Reasons for Soundess/ Legal Complaince:
The house building total set out under the policy will not meet needs District wide. The Core Strategy will therefore not be in conformity with the South East Regional Plan, nor the evidence that supported that plan. There is also the question as to what account has been taken of the possibility that neighbouring Rother District is not able to meet its housing targets, if the Bexhill Urban Extension does not proceed with the Hastings/Bexhill link road unfunded. Change Required

Details of Changes to be Made:
Council to add explanatory text.

Details of Reasons for Soundess/ Legal Complaince:
Hallam Land Management Limited (HLM) object to the level of housing proposed, on the grounds that it falls short of what is reasonably required to meet the housing needs. A detailed explanation of the grounds on which this objection is sustained are set out in the submission made by Turley Associates on behalf of HLM.

Details of Changes to be Made:
The Proposed Submission Core Strategy should provide for at least 11,000 (and arguably up to around 16,000) dwellings over the period 2006-2030, to comply with the requirements of the SEP and the available evidence on household and dwelling formation.
Representation ID
370
Person ID  Mr  Eddison
521943  Batcheller Monkhouse
Agent ID  Mr  Ide
335759  Batcheller Monkhouse

WCS1 Provision of Homes and Jobs 2006-2030
Policy 1

Sound  □ Yes  ☑ No  □ Justified  ☑ Effective  □ Consistent with national policy
Legally Compliant  ☑ Yes  □ No

Details of Reasons for Soundess/ Legal Complaince:
The house building total set out under the policy will not meet needs District wide. The Core Strategy will therefore not be in conformity with the South East Regional Plan, nor the evidence that supported that plan. There is also the question as to what account has been taken of the possibility that neighbouring Rother District is not able to meet its housing targets, if the Bexhill Urban Extension does not proceed with the Hastings/Bexhill link road unfunded. Change Required

Details of Changes to be Made:
Council to add explanatory text.

Representation ID
395
Person ID  Mr  Wadman
335824
Agent ID  Mr  Ide
335759  Batcheller Monkhouse

WCS1 Provision of Homes and Jobs 2006-2030
Policy 1

Sound  □ Yes  ☑ No  □ Justified  ☑ Effective  □ Consistent with national policy
Legally Compliant  ☑ Yes  □ No

Details of Reasons for Soundess/ Legal Complaince:
The house building total set out under the policy will not meet needs District wide. The Core Strategy will therefore not be in conformity with the South East Regional Plan, nor the evidence that supported that plan. There is also the question as to what account has been taken of the possibility that neighbouring Rother District is not able to meet its housing targets, if the Bexhill Urban Extension does not proceed with the Hastings/Bexhill link road unfunded. Change Required

Details of Changes to be Made:
Council to add explanatory text.
Representation ID
412
Person ID Mr Ide
521977
Agent ID Mr Ide
335759
Batcheller Monkhouse

WCS1 Provision of Homes and Jobs 2006-2030

Policy 1

Details of Reasons for Soundness/ Legal Compliance:
The house building total set out under the policy will not meet needs District wide. The Core Strategy will therefore
not be in conformity with the South East Regional Plan, nor the evidence that supported that plan. There is also
the question as to what account has been taken of the possibility that neighbouring Rother District is not able to
meet its housing targets, if the Bexhill Urban Extension does not proceed with the Hastings/Bexhill link road
unfunded. Change Required

Details of Changes to be Made:
Council to add explanatory text.

Sound ☐ Yes ☑ No ☐ Justified ☑ Effective ☐ Consistent with national policy
Legally Compliant ☑ Yes ☐ No

Representation ID
443
Person ID Dr Evershed
106106
Agent ID

WCS1 Provision of Homes and Jobs 2006-2030

Policy 1

Details of Reasons for Soundness/ Legal Compliance:
This is an expansion of my previous comment ref id 282. 1. Legality Issue The proposed Core Strategy is not legal
because it has not met the requirement for new dwellings set out in the South East Regional Plan. In the paper
'Development of the Proposed Submission Core Strategy Background' (Feb 2011) on page 7 the District Council
admits that the South East Region Plan REQUIRES that AT LEAST 11,000 dwellings is provided between 2006 and
2026. The proposed Core Strategy is for only 9,600 from 2006 to 2030. In the Cala Homes (South) legal case,
10th November 2010, the judge found that the Government did not have powers to revoke the Regional Strategies
which continue to prevail. Thus District Councils can not legally anticipate the Localism Blll which may or may not
be enacted. 2. Housing Demand Issue In the paper 'Managing the Delivery of Housing' (Feb 2011), the District
Council show that the likely demand for housing (using Office of National Statistics projections) between 2006 and
2030 is 16,900, higher than the South East Region Plan. So on the basis of local demand, the Core Strategy
should provide for 16,900 dwellings by 2030 rather than the 9,600 proposed.

Details of Changes to be Made:
By increasing the Core Strategy proposals for new dwellings from 9,600 to 16,900 by 2030, the Core Strategy will
meet the legal South East Region requirement for new dwellings and the local housing demand which it is any
Council's duty to do.
Objective SPO3 and Policy WCS1 of the PSCS seeks to provide for 9600 dwellings within Wealden from 2006 to 2030, comprising a phased delivery of an average of 400 dwellings per annum across the 24 year period. Planning Policy Statement 12 sets the Government’s policy on Local Development Frameworks. Paragraph 4.1 and 4.2 state that a Core Strategy should include an overall vision of how an area and the places in it should be developed. It should set out how much development is intended to happen, where and when. It states that the vision should be in general conformity with the Regional Spatial Strategy (RSS). Within Wealden district, the RSS comprises the South East Plan, adopted in May 2009. Policy H1 sets out the requisite housing provision for the region over the period 2006-2026. Within Wealden, Policy H1 requires the LPA to prepare plans, strategies and programmes to ensure the delivery of the annual average of 550 net additional dwellings, equivalent to 11000 over the 20 year plan period. The PSCS therefore seeks to provide a much lower housing increase than required by the RSS, by some 150 per annum, or 3000 over the 20 year plan period up to 2026. On this basis the PSCS is not in general conformity with the RSS and it is in conflict with the requirements of PPS12, and is therefore unsound. It is acknowledged that Policy SCT5 of the RSS seeks to deliver some 7100 of the total 11000 new dwellings within the south of district within the defined Sussex Coast sub-region and that this should focus on existing towns by optimising the use of previously developed land and where necessary, by making new allocations as sustainable extensions of existing towns. However, given the infrastructure capacity limitations noted in the PSCS, it is considered that some of this total would be better located in and around other towns within the District, in particular, Uckfield. It is noted that the Coalition Government attempted to revoke RSS on 06th July 2010 relying on powers under Section 79(6) of the Local Democracy, Economic Development and Construction Act 2009. However, this decision was successfully appealed on 10th November 2010. RSS’ will therefore remain part of the Development Plan until abolished by primary legislation. Subsequent challenges have taken place in the Courts. At the current time the Secretary of State for DCLG’s letter of 27th May 2010, advising LPA’s of his intention to rapidly abolish RSS’ is a material consideration. Given this current position, the PSCS should plan to deliver a housing requirement that reflects the requirements of the RSS. This will deliver a Core Strategy that is in general conformity with this higher tier planning strategy. Furthermore, the RSS housing figures are based upon the need to respond to the economic and housing circumstances of the area, and these remain equally valid despite the intention to remove the RSS in due course. The PSCS should therefore plan for housing growth across the district of 550 net additional dwellings per annum, equating to a total of 13200 over the 24 year plan period (2006- 2030).

Details of Changes to be Made:

Given this current position, the PSCS should plan to deliver a housing requirement that reflects the requirements of the RSS. This will deliver a Core Strategy that is in general conformity with this higher tier planning strategy. Furthermore, the RSS housing figures are based upon the need to respond to the economic and housing circumstances of the area, and these remain equally valid despite the intention to remove the RSS in due course. The PSCS should therefore plan for housing growth across the district of 550 net additional dwellings per annum, equating to a total of 13200 over the 24 year plan period (2006- 2030).
Representation ID
1640
Person ID  Pelham Homes
107745
Agent ID  Mrs Owen
102625
Jennifer Owen & Associates Ltd.
WCS1 Provision of Homes and Jobs 2006-2030
Policy 1
Sound  □ Yes  ☑ No  □ Justified  □ Effective  □ Consistent with national policy
Legally Compliant  □ Yes  □ No
Details of Reasons for Soundness/ Legal Compliance:
"Supplementary documents have been submitted but not attached, and may be viewed at the Council offices on request".
Details of Changes to be Made:
REVISION SOUGHT Amend net additional dwelling requirement to at least 8,311 to provide at least 13,200 dwellings over the period 2006 - 2030.

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Representation ID
1650
Person ID  Rydon Homes Ltd
516047
Agent ID  Mr. Hough
516026
Sigma Planning Services
WCS1 Provision of Homes and Jobs 2006-2030
Policy 1
Sound  □ Yes  ☑ No  ☑ Justified  ☑ Effective  ☑ Consistent with national policy
Legally Compliant  □ Yes  □ No
Details of Reasons for Soundness/ Legal Compliance:
The provision of 9,600 dwellings over the period of 2006 - 2030 is not supported by the evidence base and will not meet housing need in the District. It does not take account of housing need in the wider area outside the District. There is no evidential relationship with employment growth. The more robust assessment in the S E Plan is a more robust basis for the Plan.
Details of Changes to be Made:
Increase the housing provision figure to 11,00 over the period 2006 - 2026. Address employment land provision in the context of job numbers in the wider area, including recognition of the regional and national importance of the Gatwick area and the South East in general.

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Representation ID
1583
Person ID  Ognjanovic
522137
Agent ID  Polegate Town Council
WCS1 Provision of Homes and Jobs 2006-2030
Policy 1
Sound  □ Yes  ☑ No  □ Justified  □ Effective  □ Consistent with national policy
Legally Compliant  □ Yes  □ No
Details of Reasons for Soundness/ Legal Compliance:
If the planning appeal APP/C1435/A/10/2130580 Honey Farm is successful, the whole allocation would no longer be relevant or necessary and the policy in housing numbers terms would be unsound.
Details of Changes to be Made:
Wealden DC have opted to consider its abolition in the near future as a basis for the draft Core Strategy and have chosen to make its own assessment of requirement with no reference either to the South East Plan or the background studies which were carried out in order to underpin the substantial work which went into assessing the housing requirement for the region including Wealden District. It is useful to note that whilst the Core Strategy covers the period up to 2030 with a starting date of 2006 for assessment purposes the South East Plan covered a period just 4 years short finishing in 2026. 1.2 Table 1, Comparison of Trend, SEPPlan and Draft CS based housing requirement: Trend based requirement 2006-2026 15,000 Trend based requirement 2006 - 2030 16,800 Trend based requirement 2006 - 2030 annual rate 700 SEPPlan based requirement 2006 - 2026 11,000 SEPPlan based requirement 2006 - 2030 13,200 SEPPlan based requirement 2006 - 2030 annual rate 550 (The figure for 2006 - 2030 is a straight projection of the annualised 2006 - 2026 figure by 4 years) Core Strategy based requirement 2006 - 2026 8,000 Core Strategy based requirement 2006 - 2030 9,600 Core Strategy based requirement 2006 - 2030 Annual rate 400 (The figure for 2006 - 2026 is a reduction of the annualised 2006 - 2026 figure by 4 years) SEPPlan requirement for South Wealden 2006 - 2026 7,000 SEPPlan requirement for South Wealden 2006 - 2030 8,400 SEPPlan requirement for South Wealden 2006 - 2030 350 (The figure for 2006 - 2030 is a straight projection of the annualised 2006 - 2026 figure by 4 years). The Council's assumption that with the removal of the South East Plan localism would be best served by a reduction in the number of dwellings to be built in Wealden is wrong. The South East Plan is based on a redistribution of house building around the region to further various policy aims. Some districts are required to build fewer homes than would occur locally whilst others are required to build more. Wealden as a district under the South East Plan would be building less than the trend based forecast. 1.1.4 The trend based forecast is that which would occur in the district if regional policy adjustments were not introduced. For Wealden as a whole the trend based forecast for the period 2006 to 2030 is 16,800 households. this should be compared with the 13,200 net dwelling requirement under the South East Plan scenario and the 9,600 dwellings proposed by the Council in the Draft Core Strategy for the period 2006 - 2030. It is, therefore, the case that the South East Plan requirement for Wealden is one of significant restraint with the Council only being required to provide dwellings for 78.5% of the households predicted to arise in the district over the period 2006 to 2030. Under the South East Plan regime this is possible because other areas, such as Growth Areas of Ashford and the Thames Gateway in Kent would provide in excess of their trend based forecasts. 1.1.5 The Council's proposal to provide just 9,600 dwellings in the period 2006 - 2030 when it is expected that 16,800 households will form in the district, will see just 57% of the total number of dwellings that are required being provided. Furthermore, in the absence of the South East Plan, districts which had been required to provide over their trend based forecasts are now looking to reduce their requirement. Ashford, in Kent, for example has alreadyflagged up that in the absence of the South East Plan 6,500 less dwellings are proposed to be built over the 2006 to 2026 period. 1.1.6 The amount of affordable housing needed in the District is such that in Polegate for example, see BP2, there are people currently on the Council's housing waiting list who will wait 35 years before being housed. The only method for providing the significant levels of affordable housing which the Council can currently rely is through developers bringing forward allocated sites and providing the required affordable element. The Housing Needs Assessment which was completed for the Council in 2010 and which does not form part of the advertised Background Papers estimated that there was an annual requirement of 812 affordable homes needed in Wealden per annum. Under these circumstances it is not acceptable for the Council to adopt a level of housing provision which will provide just 1,649 affordable homes (9,600 less 4,889) commitments at January 2010) equals 4,711 / 0.35 (35% affordable element) over the remaining part of the plan period from 2010 to 2030. It is not possible to make the calculation from 2006 because the Council does not record the data but it is worthwhile noting that a significant number of sites have not delivered any or less than 35%. 1.1.7 The consequences of not building sufficient housing including affordable housing and following a distribution strategy which does not focus on areas acknowledged as needing regeneration are as follows. a. House prices in the district, which are already
some of the highest in the South East of England, will rise. b. Economic benefits associated with house building will be lost to the very area (the South of the district) most in need of them. c. Residents in need of affordable housing will have to leave the district. d. Overcrowding and the number of residents living in inadequate housing will increase. 

1.1.8 the conclusions with regard to affordability and housing need are supported by the findings of the Council's Housing Market Assessment where it was concluded that: "...it is essential that the level of housing proposed in the draft South East Plan is delivered, particularly in the context of the evidence on affordability and housing need presented in this report and all the more important under the scenario where the past rate of job growth is maintained....." 1.2.3 the Council have sought to argue that there are environmental and infrastructure restraints which prevent the delivery of any greater number of dwellings than 9,600 during the period 2006 - 2030. The principal constraints which they have identified are impact on the Ashdown Forest and Pevensey Levels, the latter principally due to waste water discharge, transport infrastructure and high education provision more particularly at Uckfield. These issues are not limiting factors in respect of the number of dwellings which can be built in Wealden.

Details of Changes to be Made:
2.1 Introduction 2.1.1 This section of our representations relates to the housing growth figures set out within the draft Submission Core Strategy. Our representation is summarised below: Section of Core Strategy: Spatial Planning Objective 3 (SPO3) and Policy WCS1 Provision of Homes and Jobs 2006-2030 Legally Compliant: - Sound: No Justified: Yes Effective: Yes Consistent with national policy: -

2.2 Reverting back to the RSS Tier 1 Figure 2.2.1 The ‘Dear Chief Planner’ letter from CLG to all authorities dated July 2010 states that ‘evidence that informed the preparation of the revoked Regional Strategies may also be a material consideration, depending on the facts of the case’, and ‘authorities may base revised housing targets on the level of provision submitted to the original Regional Spatial Strategy examination (Option 1 targets), supplemented by more recent information as appropriate’. 2.2.2 In the submission Core Strategy Wealden have reverted back to their option 1 targets of 400 units per annum. We contend that given (i) the conclusions drawn by the South East Plan panel report, (ii) policy in the adopted South East Plan, and (iii) the availability of new demographic information, that the Council should not simply roll back to the option 1 figures. Taking each in turn: (i) South East Plan panel report 2.2.3 The recommendations of the Panel were made based on the availability of technical evidence and material submitted to them. Importantly, they were not an expression of political will or influence. 2.2.4 The panel noted that draft South East Plan housing level for the Rest of East Sussex area — including the north of Wealden - was at the lower end of the 300-500 dpa range included in the consultation draft RSS, January 2005, and that the district-wide rate proposed for Wealden was significantly below provision levels in the last structure plan. 2.2.5 The panel also noted that the proposed distribution of housing for the Rest of East Sussex area, following consultation in September 2005, was termed “balanced dispersal”, and takes account of the role and accessibility of each rural settlement moderated by environmental designations. The Panel noted that this appeared to be a sound approach. 2.2.6 However, the Panel considered that a modest increase (600 dwellings equating to 30 dpa) could be justified in the rest of Wealden focused on Uckfield. Recommendation 26.6 stated that, ‘In the rest of East Sussex, add 600 dwellings (30 dpa) to the rest of Wealden based on the potential for sustainable growth at Uckfield’. 2.2.7 So, the Panel recognise the importance of Uckfield as a focus for growth and that this should be in accordance with the balanced dispersed growth strategy which they considered to be sound. 2.2.8 The Core Strategy should not ignore these recommendations. 2.2.9 The Panel report makes specific reference to the technical evidence submitted by Wolf Bond Planning LLP (respondent no. 7095) in regard to Matter 9D of the South East Plan EIP (session date 9 March 2007). Their evidence made the point that the ‘option 1’ figures: § failed to result in a step change in housing supply, rather they resulted in an overall reduction against previous Structure Plan targets; § result in the provision of even fewer affordable homes; § failed to sully explore the potential to provide additional housing growth in sustainable locations previously approved; § artificially constrained housing supply — particularly around Uckfield — and prevented otherwise suitable land coming forward for development; and § did not recognise that Uckfield is unconstrained by environmental designations — unlike most of Wealden — and thus represents the principal and most suitable location to accommodate additional housing in the rest of the East Sussex area during the plan period. 2.2.10 In our response to the Council’s Core Strategy consultation (July 2009), we noted that Maresfield has a major role to play in contributing to the future growth and development of the District, particularly in relation to the housing requirements for the Low Weald area and identification of Uckfield as a growth location. We noted: § Uckfield is an area that was identified for housing growth in both the South East Plan and the East Sussex Structure Plan, but Uckfield itself has environmental and...
physical constraints to growth. § A strategy of balanced dispersal (as advocated in the South East Plan and the Panel Report) would point to Maresfield as a sustainable location for some growth that cannot be accommodated sustainably within Uckfield town. Maresfield could make a sustainable contribution to delivering the housing needs of the Uckfield area. § The shortage of previously developed land due to the rural character of the District, necessitates greenfield release, and Maresfield represents a relatively unconstrained location for development (compared to the majority of the district). § Maresfield has a range of facilities that meet the daily needs of residents and benefits from a close proximity to Uckfield with the potential for significantly enhanced accessibility by sustainable modes. § Community representatives support a comprehensive, holistic approach to development at Maresfield rather than a piecemeal development that offers little community benefit. 2.2.11 Maresfield benefits from a sustainable location close to Uckfield; a town identified for significant housing growth within the South East Plan. We contend that Maresfield can play a positive role in delivering the aspirations for the Uckfield area, and in doing so the settlement will benefit from a clear long term framework for its long term future. Further, if the strategic role of the village is not recognised in the Core Strategy there is a real threat of small scale, piecemeal development will occur in the village which would fail to bring the benefits associated with a sustainable long term strategy. 2.2.12 In summary, we contend that, in reconsidering the growth figures for the District following the ‘Dear Chief Planner’ letter of July 2010, it is not appropriate for the council to ignore the recommendations of the South East Plan Panel, whose decisions were based on technical evidence. Their recommendations should be reflected in the Core Strategy. 2.2.14 The South East Plan still comprises part of the development plan and the policies within this need to be considered. The South East Plan sets a housing requirement of 11,000 homes to be provided in Wealden over the period 2006-2026 at an average of 550 homes per annum. However, the South East Plan states that in relation to housing requirements: ‘the level that is set here [i.e.: in the plan] is still significantly below the forecast growth of households and even more so by the more recent 2006-based population projections’ (paragraph 7.6). 2.2.15 It goes on to say that: ‘the review of this RSS will examine the current levels of housing and a rate of provision higher than 32,700 dwellings per annum is likely to be necessary to meet the strategic needs in the region’. 2.2.16 So, the RSS itself acknowledges that the housing figures for the area were being suppressed and that higher targets should in fact have been set. This point is made in Wealden’s own Housing Market Assessment. At paragraph 1.23 it states that: ‘trend based projections predict growth of 700 households per annum in Wealden district over the next 20 years. This is around 20% more than the target dwelling provision set for the district in the draft South East Plan (550 dwellings pa).’. The data therefore suggests that in an unconstrained market, demand for new housing in North Wealden would exceed current dwelling targets’. 2.2.17 The Housing Market Assessment recognises the importance of regional policy interventions rather than purely using trend forecasting, but it also acknowledges the linkages between housing growth, job creation and economic activity. The report notes (at para 1.32) that Wealden, and the north of the district in particular, is an area where ‘job and workforce growth has been buoyant in recent years’. In this context, the report notes that ‘the lower rates of housing development proposed for North Wealden are likely to mean that the area will continue to experience pressure within the housing market in the future’. SUMMARY 2.2.18 We contend that the Core Strategy is unsound, because it is not justified, as it is not consistent with the policy and evidence set out in the South East Plan and the Councils own Housing Market Assessment. (iii) Availability of new Information and Data / Household Growth 2.2.19 In November 2010 CLG published its most recent household projections, for the period 2008 – 2033. This data shows that by 2026, the number of households in Wealden is expected to grow to 73,000: a 12,000 increase from 2006. 2.2.20 The CLG Housing Statistics release states that: ‘The projections are an important part of the evidence base for assessing future housing demand and informing national and local policies on housing and planning’. 2.2.21 And: ‘Planning Policy Statement 3 requires that assessment of future housing requirements in local strategies should have regard to, amongst other factors, current and future demographic trends and profiles and take into account evidence including the Government’s latest published household projections’. 2.2.22 Although published in advance of the proposed submission Core Strategy, no reference to this information is made in the proposed submission draft. 2.2.23 The figures are lower than previous data sets – including that produced by the DCLG and used to inform the Councils Housing Market Assessment, 2007 – but are reflective of recent economic circumstances and thus take a more cautious approach to future housing growth and demand. However, the figures are substantial, and are in excess of the level of housing planned for in the Core Strategy. It is entirely unclear how these have informed the level of growth. 2.2.24 Technical Note 5 to the South East Plan explains how household projections are converted into dwelling numbers. The Chelmer Model of long-term migration projections derives a household to dwelling ratio of 1.03 . Using this ratio, the most recent CLG household projections (12,000 additional households 2006-2026) would result in a need for 12,360 new dwellings over the same period. This equates to an annual average of 618 new homes across Wealden: 218 per year more than the proposed submission Core Strategy plans for. 2.2.25 In addition to overall housing numbers is the important issue of affordable housing. The proposed submission Core Strategy acknowledges that provision of affordable housing is a priority. However, across the district, the number of affordable units required on a per annum basis far exceeds the level of growth set out in the housing trajectory. 2.2.26 The Council’s Housing Needs Assessment (January 2010) estimates that there are currently 1,215 households in need of affordable housing across the District but that there is only an estimated 325 properties available to offset this current need. In addition to current need, the Housing Needs Assessment also addresses future need. This states (at para 6.42): ‘The data suggests that on an annual basis there will be 152 newly forming households requiring affordable housing and a further 831 existing households. The total future need for affordable housing is therefore estimated...
to be 983 units per annum’. 2.2.27 So, not only is the Core Strategy planning for the provision of fewer homes than is needed, it will not deliver on its priorities for affordable housing. 2.2.29 The Core Strategy should thus be reviewed and amended to reflect the housing demand indicated by the household projections and need, and the implication for their spatial distribution considered. 2.3 Housing Trajectory – 400 units per annum 2.3.1 There are two issues to address here, (i) whether the targets are minima or maxima, and (b) justification for the 400 unit per annum target: (i) Minima or Maxima 2.3.2 We note that policy SPO3 states that ‘we will provide for at least 9,600 homes within Wealden….. on average 400 dwellings per annum’. Policies and supporting text elsewhere in the plan also make reference to the level of housing being ‘at least’ (see, for example, para 5.3). 2.3.3 Through the use of the term ‘at least’ we welcome the recognition that housing figures should be treated as floors rather than ceilings. They are in effect minima. This is in line with advice from PINS (Advice Note 1062, May 2008): that housing targets are to be regarded as floors and not ceilings and if suitable sites for housing come forward which are not allocated in plans, that is to be seen as a bonus and not detrimental. The South East Plan also recognised this. It stated, at para 7.8: ‘the fact that an annual provision or local trajectory number has been met should not in itself be a reason for rejecting a planning application. Decisions should be taken on their merit and local circumstances – including longer term housing needs and affordability in an area’. 2.3.4 We support the fact that housing targets in the Core Strategy are minima, but are concerned as to how this will be interpreted, particularly given experience elsewhere in the district where the Council are using completions and housing land supply as a means to refuse planning applications. 2.3.5 In respect of establishing minimum housing targets, we consider the Core Strategy sound, albeit that the minimum figure of 400 units per annum should be greater. However, if the housing figure established in the submission Core Strategy is truly a minima, then planning applications that provide housing over and above this level must be determined on their merits: they can not be refused simply because the annual housing target has already been met in the district. We request that this is clarified within the Core Strategy. (ii) Rationale for 400 units per annum 2.3.6 Para 5.13 of the submission Core Strategy states ‘over the last 21 years on average 400 dwellings have been built per annum across the District… It is considered that a similar rate in the future is achievable’. 2.3.7 We do not agree that this is an appropriate rationale for the housing trajectory. Over the last 21 years the rate of delivery has fluctuated dramatically. Over the last ten years there has been a history of underperformance when compared to structure plan, the South East Plan and local plan targets. Indeed, there is a ‘backlog’ of housing delivery against these plan targets. Over the period 1991 – 2009 there have been 7,320 completions across the district. This is set against a requirement for 9,240 homes based on Structure Plan (and thus Local Plan) figures for the same period, 2. 8,250 homes based on the Structure Plan targets up to 2006 and the adopted South East Plan targets for the remaining period (2006 - 2009), or 3. 7,800 if the adopted South East Plan figures are replaced with the South East Plan tier 1 figures. 2.3.8 At the recent inquiry relating to the Honey Farm site in Poleygate in the south of the district, the Council and the appellant agreed the base for completions across the district for the four and a half year period running from April 2006 – September 2010. There were 1,642 completions over the period. This is a shortfall against both the Core Strategy (of 158 units) for that period, and the South East Plan (833 units). Perhaps more significantly, it represents a significant shortfall against the projections contained within the Councils own Housing Market Assessment. As noted previously, this predicted growth of 700 households per annum in the district. Against this, the appellants demonstrated a shortfall of 1,508 units for the period April 2006 – September 2010. 2.3.9 Underperformance against targets has not been helped by the lack of an up-to-date local plan and associated identified and allocated development sites (The 1998 Local Plan and its saved policies are still being used for development control purposes) and the focus on reusing brownfield land, which restricted housing development in places characterised by their countryside setting, such as Wealden. Recent Ministerial Statements now make it clear there will be a presumption in favour of sustainable development and the intention is to increase housing delivery. There is also no brownfield target that may constrain development in places such as Wealden. 2.3.10 Interestingly, delivery rates in Wealden in the last few years have been their highest for some time , despite the economic climate. The Core Strategy now provides the opportunity not only to address previous underperformance but to proactively plan for the future. So why does the housing trajectory seek to constrain the market in Wealden at the very time when it is showing it can actually delivery increased levels of new homes? Establishing a figure of 400 units per annum, based on historic delivery, is an artificial constraint. The fact that there has been historic underperformance in housing delivery in the district should not be a determinant of what the future level of growth should be. 2.3.11 The annual housing requirement must also be assessed in light of housing need and demand, to which we have referred in section 2.2 above. This demonstrates that housing growth should be in excess of that identified in the Core Strategy. This also needs to be set in the context of historic undersupply against previous Structure Plan targets, resulting in a backlog of housing. So, the 400 per unit target is artificially low and should be increased. 2.4 No justification / rationale provided for changes to growth figures allocated to Maresfield between 2007 Issues and Options and 2011 Proposed Submission Draft 2.4.1 The 2007 Issues and Options Core Strategy identified that the potential scale of growth in Maresfield was between 350 - 500 new homes. Consultation responses to this (option 21a of the Issues and Options draft) received both support and objection. 109 responses were received. 2.4.2 The Maresfield Conservation Group agreed with the level of growth, though stating that ‘any development should be carefully planned in terms of traffic management, sensitive integration with the village and energy saving’. 2.4.3 Other respondents (for example, respondent ID: 107127) noted: ‘Agree as this site has well defined and defendable boundaries, is next to an employment site, near to 2 stations and traffic is easily dispersed by the village roundabouts, there is little landscape quality to the site’. 2.4.4 The chart copied below has been extracted
from the paper prepared for Agenda Item 8, WDC Cabinet Local Development Framework Sub Committee, 15th October 2007. As expected, both support and objection was made in regard to the quantum of growth identified for Maresfield. However, what is important is that the majority of responses - almost 60% - were in support (see column titled option 21a). What is perhaps even more significant here is that of the Villages around Uckfield where a question about growth was posed in the 2007 Issues and Options, the only one that received a majority in agreement with the specified level of growth was Maresfield. So why was this ignored? Figure 2.1: Summary of Consultation Responses: 2007 Core Strategy Issues and Options, Option 21 Source: page 82, Agenda Item 8, WDC Cabinet Local Development Framework Sub Committee, 15th October 2007 2.4.5 The 2009 Spatial Options Core Strategy presented six options for growth across the district. This dramatically reduced the potential for growth in Maresfield to between 11 and 150 new homes. None of these are for the same level of growth as in 2007. Given that the majority of responses to the 2007 consultation indicated support for the level of growth identified (between 350 – 500 homes) it is not clear why the decision was made to reduce the potential growth figure by more than half. There should have at least been some acknowledgement of the previous figures and this should have been presented as an option. 2.4.6 The only rationale we can see for reducing the potential level of growth in Maresfield is in regard to the settlement hierarchy, which, between 2007 and 2009, changed the status of Maresfield from a ‘local centre with growth potential’ to an ‘accessible settlement with limited facilities’. As we point out in section 3.1 of this response, the settlement classification significantly underplays the potential of Maresfield, ignoring, for example, the fact that a very real opportunity exists to balance homes and jobs in the area given the planning permission granted for the Ashdown Business Park, which will generate between 600 – 700 jobs in what has been termed ‘the most strategically significant employment site in North Wealden’ . 2.4.7 Based on consultation responses to the 2009 spatial options, the submission Core Strategy now sets the housing figure for Maresfield at just 50 units. This represents just 10 percent of the originally identified potential for Maresfield. It is not clear what the rationale and justification for such a significant reduction is. We note that responses made by Maresfield Parish Council to the 2009 spatial options Core Strategy note that the Parish would accept up to 50 units in Maresfield, but that greater than 50 would be considered acceptable if substantial local benefit can be demonstrated / delivered. 2.4.8 The biggest change to the level of growth was made between 2007 and 2009. Conversely, this is when housing figures in the South East Plan were in the process of being increased. There does not appear to be any evidence to suggest why the housing figure in Maresfield should be reduced so dramatically: indeed, submissions made to the 2007 consultation expressly state that a limited number of 300 units should be accommodated in Maresfield (see page 163 of Agenda Item 8, Appendix C, Technical Summary of Issues Raised through the Issues and Options Consultation Process, Cabinet Local Development Framework Sub Committee Date: 15th October 2007).

Details of Changes to be Made:
SUMMARY 2.2.13 Having ignored these recommendations, we contend that the Core Strategy is unsound, because it is not justified, as it is not founded on the evidence available and considered robust by the independent Panel conducting the examination in public of the South East Plan. (ii) Adopted South East Plan SUMMARY 2.2.28 We contend that the Core Strategy is unsound because (i) it is not justified as it is not based on the available evidence which points to a need for substantially more homes to be provided across the district and, furthermore, does not explain how this has been taken into consideration; and (ii) it is not effective, because the level of housing growth set out will mean the plan can not deliver on its priorities to deliver affordable housing. SUMMARY 2.3.12 We thus contend that the Core Strategy is unsound because (i) it is not justified as does not accord with the evidence base, which indicates higher rates of housing delivery is required and (ii) it is not effective because it is not deliverable: simply achieving 400 units per annum will not deliver the quantum of growth required to meet the requirements in the district. SUMMARY 2.4.9 In summary, we contend that the plan is unsound as the housing growth is not justified as it does not appropriately reflect the evidence base.
## Representation ID
1661

### Person ID
536361

### Agent ID
102504

### Redrow Homes Group Services - Strat
Woolf Bond Planning

### Policy ID
WCS1 Provision of Homes and Jobs 2006-2030

### Policy
Policy 1

### Sound
☑️ Yes
☒ No
☑️ Justified
☑️ Effective
☑️ Consistent with national policy

### Legally Compliant
☑️ Yes
☒ No

### Details of Reasons for Soundness/ Legal Compliance:
Policy WCS1: Provision of Homes and Jobs 2006 to 2030 Summary Response
1.1 We object to the content of the Policy as drafted on the basis that it has not been shown to be justified, effective or consistent with national policy. 1.2 The target figure of 9,600 dwellings to be met with the District during the period 2006 to 2030 is significantly lower than the strategic requirement set out in the South East Plan (adopted May 2009) and fails to address identified needs. 1.3 Our detailed representations are set out below: Representation Spatial Strategy
2.0 The SHMA identifies needs that the core strategy makes clear spatial choices about where developments should go in broad terms. 3.1 In support of the above approach, PPS12 (paragraph 4.5) states: “It is essential that the core strategy makes clear spatial choices about where developments should go in broad terms. This strong direction will mean that the work involved in the preparation of any subsequent DPDs is reduced. It also means that decisions on planning applications can be given a clear steer immediately.” (Our emphasis) 4.1 A supporting publication, issued by PINS, titled “Local Development Frameworks Examining Development Plan Documents: Learning from Experience” (Sept 2009) provides advice to LPAs in the preparation of their DPDs. 4.2 Paragraph 20 concerns housing delivery and notes that despite its critical importance, this is an area where many plans are notably weak. 5.1 Paragraph 21 relates to the approach to land identification in Core Strategy, stating: “In some instances the weakness derives from a failure to identify sufficient and/or appropriate land for development. Sometimes this appears to derive from a reluctance to accept that unpopular decisions about allocating land, possibly green field land, for development have to be made. Simply claiming that development needs will be met within the urban areas and that the position will be reviewed if necessary in the future is not likely to be acceptable unless there is a evidence that the “urban areas only” approach is likely to be realistic. Where the scale of land needed for development is such that green field allocations are likely to be required the strategy should make this clear. In this example if the DPD is a core strategy it should either make strategic allocations or give adequate guidance for a subsequent site allocations SPS to readily identify the land needed without have to re-visit strategic considerations.” (Our emphasis underlined) 6.1 Paragraph 39 states as follows: “Some authorities appear to focus their thinking about options simply on the location of development forgetting that the notion of options includes matters such as density, the rate of development, delivery mechanisms etc.” 6.1 As set out at paragraph 4.5 of PPS12, it is essential that Core Strategies make clear spatial choices about where developments should go in broad terms. As stated, this strong direction will mean that the work involved in preparing any subsequent DPDs is reduced. It also means that decisions on planning applications can be given a clear steer immediately. 7.12 The above comments cut-through the “options” set-out in the consultations paper and form the basis against which the CS should be prepared. 8.13 Set against the findings of the SHMA, Housing Needs Assessment and the requirements set out in PPS12 (and accompanying documents), the proposed spatial strategy fails to identify sufficient land for development and should be revised, including having regard to our detailed comments et out below. 9.14 As summarised above PPS12 sets out the principal components to be included in local spatial plans. Paragraph 4.42 requires that in order to be “sound” a core strategy should be justified, effective and consistent with national policy. 10.15 In order to be justified the Core Strategy (“CS”) must be founded upon a robust and credible evidence base and represent the most appropriate strategy when considered against the reasonable alternatives. 11.16 Effective means that the document must be deliverable, flexible and able to be monitored. Paragraph 4.46 clearly states that a strategy is unlikely to be effective if it cannot deal with changing circumstances adding that plans should be able to show how they will handle contingencies. 12.17 The planned approach to the amount and distribution of growth will fail to meet identified housing needs. 13.18 Paragraph 4.6 of the guidance clearly states that core strategies may allocate strategic sites for development. 14.19 Sites central to the delivery of the key spatial objectives and able to provide supporting infrastructure provision whether on-site and or through S106 contributions toward off-site provision should be identified in the Core Strategy. 15.20 The release of sites allocated for development in the Core Strategy should not be delayed due to an inflexible policy requiring the sites to be identified in subsequent DPD’s. The Strategic Housing Requirement 1.21

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In preparing Local Development Documents, both PPS3 and PPS12 require LPAs to set out policies and strategies for delivering their strategic housing requirement in order to enable continuous delivery of housing for at least 15 years from the date of adoption. 1.22 The Core Strategy covers the period to 2030, in excess of 15 years from the anticipated date of adoption. 1.23 The policy basis against which the Core Strategy is to be prepared includes the Regional Spatial Strategy (RSS) for the South East (the South East Plan (SEP)). This was adopted in May 2009 and sets out the approach to meeting the strategic housing requirement within the District in the period to 2026. 1.24 SEP Policy H1 sets out a requirement for the delivery of 11,000 dwellings within the District during the period 2006 to 2026, equivalent to 550 per annum. 1.25 The requirement is “split” between the north and south of the District, with South Wealden1 (comprising that part within the Sussex Coast Sub-region) identified as providing 7,000 dwellings and North Wealden2 providing 4,000. 1.26 The requirement to be met in the component parts of the District is summarised in Table 1 below. As set out in the South East Plan, the requirement figures to be met in the component parts of the District are not to be ring-fenced. Rather, flexibility has been applied in order to vary the housing provision between the two policy areas if this is demonstrated to be more appropriate locally. Table 1: South East Plan Housing Requirement to be met in Wealden(2006 to 2020)

<table>
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<tr>
<th>Sub-Regional Housing Req.</th>
<th>Total District Housing Req. outside Sub - Wide (Sussex Coast - Region Housing Req. South Wealden) North Wealden</th>
<th>Total District Housing Req. outside Sub - Wide (Sussex Coast - Region Housing Req. South Wealden) North Wealden</th>
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| Total Wealden                  | 350 7,000 200 4,000 550 11,000                                                                             | 1.27 Although the 550 dwellings per annum is evidence based, having been tested through preparation of the SEP, as I made clear at paragraph 7.6 of the SEP, the annualised requirement level is still significantly below the forecast growth of households and even more so below the more recent 2006 – based population projections. Furthermore, the independent advice from the National Housing Planning Advice Unit (NHPAU) suggests a figure which is significantly higher than the level of housing provision set out in Policy H1. 1.28 Paragraph 7.7 of the SEP notes that LPAs can test higher numbers through preparation of their development plan documents. This is particularly relevant in the case of Wealden where there is an acute affordable housing need. 1.29 The adopted SEP also states that a subsequent review of the RSS would examine the current levels of housing and a rate of provision higher than the annualised requirement set out in the RSS, which it considered was likely to be necessary to meet the strategic needs in the region. 1.30 Pursuant to recent government announcements, there has been much debate as to the weight to be applied to the policies and proposals of the RSS. 1.31 In May 2010 the SoS for Communities and Local Government wrote to all Local Authority Chief Planning Officers to highlight the Government’s intention to rapidly abolish Regional Spatial Strategies and return decision making powers on housing and planning to local councils. 1.32 The DCLG’s subsequent announcement and accompanying advice note dated 6 July 2010 stated that Regional Strategies had been revoked by the Secretary of State under s79(6) of the Local Democracy Economic Development and Construction Act 2009 and were said to no longer form part of the development plan for the purposes of s38(6) of the Planning and Compulsory Purchase Act 2004. It was advised at that time that the legal basis for Regional Strategies was a matter to be abolished through the Localism Bill. 1.33 The 6 July revocation decision was then subject to challenge in the Cala Homes (South) Ltd case (2010 EWHC 2866). This was decided on 10 November 2010 and the outcome was to quash the 6 July revocation with the court ordering the decision by the SoS to revoke the strategies with immediate effect was unlawful. The effect of the decision is to re-establish Regional Strategies as par to the development plan. 1.34 The subsequent High Court decision dated 7 Feb 2011 confirms in relation to the plan making functions of LPAs and the materiality of the decision to revoke the RSS in the future as follows: “While Regional Strategies subsist a local planning authority will have to make sure to discharge its duty to achieve general conformity with them. Failure to do this would expose the offending plan to the risk of challenge in the courts. An authority preparing a plan in no more at liberty to override its duty under section 24 (1) of the 2004 Act than it is to disregard its duty under section 38(6) when determining an application for planning permission. The statement and letter of 10 November 2010 has not warranted, let alone incited, any such breach. Neither has the SoS’s letter of 27 May 2010.” 1.35 Against the above background, LPAs must have regard to the provisions of the RSS in preparing their LDF documents. Accordingly, the SEP provides the most up to date and independent review of housing and employment need in the area and (in accordance with DCLG advice in July 2010 (Chief Planning Officer’s Letter) this should be the starting point for preparing the CS. 1.36 In addition to the above, the recent DCLG letter to Chief Planning Officers dated 31 March 2011 sets out a number of objectives from the Budget that need to inform the decisions LPAs are taking now. This includes through plan production. 1.37 The letter follows the publication of a Written Ministerial Statement on 23 March 2011 and represents a material planning consideration.
substantially in excess of what is being planned for through the CS. 1.41 The level of affordable need is summarised in “Managing the Delivery of Housing” Background Paper (BP) which states as follows: · Both the SHMA and Housing Needs Assessment identify substantial housing need within Wealden and also highlight very significant affordability issues (para 2.3) · There is a requirement for significant new housing development within the District which would encourage some in-migration in order to maintain population levels (para 2.4) · There is an acute level of affordable housing need within the District (para 5.3) · Average house price levels are extremely high in Wealden and this means that many of Wealden’s residents are unable to afford to purchase housing on the private market. A standard and widely accepted measure of affordability is the house price to median income ratio which gives an indication of whether an area’s residents are able to afford private market housing. The Wealden figure for this ration is 9.4 compared to an East Sussex average of 7.6, a South East average of 7.3 and a figure for England of 6.3. Wealden has the highest ratio of all the East Sussex authorities and is therefore one of the most difficult and expensive places in which to access the housing market. Furthermore, the Strategic Housing Assessment highlights that not only are a high proportion of Wealden’s households unable to afford to purchase market housing, but a high proportion are also unable to afford private rented accommodation. (para 6.4) 1.42 Paragraph 6.15 concludes as follows: “It is clear that there are important housing issues within Wealden which need to be addressed by the Core Strategy. There are over-riding affordability issues within the District, with high house prices and rental levels making the District on of the least affordable areas in the country. Data from the Housing Register and Housing Needs Assessment indicates a very high level of housing need which needs to be addressed through the provision of affordable housing.” 1.43 Evident from the above is that there is an acute level of housing need to be met within the District. This necessitates a need to set a more appropriate housing target and to provide for the allocation of deliverable and developable sites for housing, at suitable locations (including on previously developed and greenfield sites), particularly where they contribute to sustainable patterns of development. 1.44 The highest level of affordable housing need is in Hailsham. 1.45 As set at Appendix 2 to BP2 ("Managing the Delivery of Housing"), Hailsham has the highest estimated need for affordable housing at 266 gross dwellings per annum. 1.46 The gravity of the affordable housing position in Hailsham is summarised at para 8.3 of BP2 which states, inter alia, “assuming that the current rates of turnover are maintained, then it would take 8 years to house all of those currently on the Housing Register that require a 2 bed house, 6 years to house those that require a 3 bed house and 51 years to house those that require a 4 bed house.” 1.47 When determining the local level of housing provision LPAs are required to take into account evidence of current and future levels of need and demand for housing and affordability levels based upon, inter alia, local and sub-regional evidence of need and demand, set out in Strategic Housing Market Assessments (SHMAs) and other relevant market information such as long term house prices (PPS3). 1.48 The local need for housing justifies a higher annualised requirement over and above that set out in the SEP. 1.49 Notwithstanding the acute level of housing need identified in the evidence base to the CS, the Council’s spatial strategy suggests planning for a rate of housing growth significantly below that set out in the South East Plan and substantially below the identified affordable need 1.50 In planning for a substantially reduced rate of growth, Background Paper 14 suggests that a number of issues have a significant strategic impact of growth. Para 6.3 of the BP refers specifically to the capacity of the waste water treatment works affecting growth in Hailsham, Polegate, Stone Cross and Willingdon and the need to deliver the new road network and regeneration in Uckfield. 1.51 The stated constraints are said by the Council to support their assessment that a maximum of only 9,600 dwellings could be delivered during the plan period to 2030. 1.52 We object to the Council’s approach to the setting of a locally derived requirement. As the Council acknowledge, there is a demonstrable need for a significant level of house building, on which basis the CS should plan to meet the quantum of identified need. Planning for a level of housing growth commensurate with the requirement set out in the SEP is likely to help sustain and support economic growth. This will not be achieved with the level of growth proposed in the CS. Moreover, providing for a more appropriate level of housing growth (commensurate with the SEP requirements) is likely to provide the critical mass necessary to fund improvements to key service and infrastructure provision. After all, one of the fundamental roles of the CS is to establish an overall vision setting our how the objectives for the area will be delivered. 1.53 As set out above, the South East Plan covers the period to 2026 and requires the delivery of some 550 dwellings per annum. This implies an extra 2,200 dwellings for the additional four year period 2026 to 2030. 1.54 Against the above background, we are of the view that the CS should plan to provide a minimum of 13,200 dwellings during the period 2006 to 2030 (11,000 + 2,200). However, this level of provision will not still meet the identified local need. 1.55 The components of supply relied upon by the Council in meeting the 9,600 requirement figure are summarised below. For comparative purposes we also set out the position against the requirements of the SEP based housing requirement to 2030. Details are set out in Table 2 below: Table 2: The House Land Supply Position LPA WBP Requirement 2006 to 2030 9,600 13,200 Completions 2006 to 2010 1,331 1,331 Residual Requirement 2010 to 2030 8,269 11,869 Sources of Supply Commitments with pp 3,159 3,159 Non-Stat Local Plan Allocations 399 399 Proposed Allocations: - SD1 1,000 1,000 - SD2 600 600 - SD3 700 700 - SD4 700 700 - SD6 and SD7 650 650 - SD8 and SD9 140 140 - SD10 160 160 - SD11 160 160 - SD12 120 120 - Villages 455 455 - Total 4,685 4,685 Total Supply 8,243* 8,243* Total Supply 9,574 9,574 Shortfall/Supply -26 -3,626 *The LPA’s delivery assumptions remain to be tested in respect of all sites. 1.65 The CS makes provision for the delivery of 9,600 dwellings. This approach is based upon the Council’s assumptions about the capacity of the environment and supporting infrastructure (highways and water) to accommodate the quantum of proposed development. 1.57 In relation to Hailsham, we note reference in the SHLAA to the fact that the current waste water treatment constraints may be able to be overcome, given that...
additional treatment works capacity for a further 1,500 new dwellings may be in place post 2012 (subject to finding approval by Southern Water). This may further increase the scope for additional growth at the town. 1.58 The council’s strategy is not based upon an assessment of need and the quantum of housing proposed to be met in the period to 2030 is likely to fail to deliver stated objections SPO3, SPO4 and SPO6. 1.59 Even if one were to adopt the assumption that all of the identified components of supply will be delivered in a timely manner, the result would be a 3,626 dwelling shortfall against the requirements of the SEP in the period to 2030. 1.60 The Council’s strategy is not consistent with national policy. In addition, it fails to represent the most appropriate strategy when considered against the alternatives (a higher annualised rate of growth is required to meet identified need/demand). Finally, the strategy is not sufficiently flexible to deal with changing circumstances.

Details of Changes to be Made:
Summary of Suggested Changes 1.61 As set out in PPS12, the CS should be prepared against the regional framework set out in the evidence base to the draft RSS. This includes having regard to, inter alia, the overall housing requirement to be met during the plan period.

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<tr>
<th>Representation ID</th>
<th>Person ID</th>
<th>Personal Name</th>
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<th>Agent Name</th>
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<tbody>
<tr>
<td>1716</td>
<td>107752</td>
<td>Gall Heron Land Developments Ltd</td>
<td>102592</td>
<td>Boyer Planning Limited</td>
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</tbody>
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WCS1 Provision of Homes and Jobs 2006-2030

Sound  Yes  No  Justified  Effective  Consistent with national policy
Legally Compliant  Yes  No

Details of Reasons for Soundness/ Legal Compliance:
3.3. WCS1 Provision of Homes and Jobs 2006 - 2030. 3.3.1 Policy WCS1 proposes a provision of 8,600 dwellings in Wealden District over the period 2006 - 2030, equivalent to 400 dwellings per annum (dpa). This represents a locally-derived target which is explained in para. 3.11 of the Consultation document to be based on estimates of capacity and community aspirations. This proposed level of provision must be compared with the intention of the South East Plan whereby housing provision of 550 dpa was proposed. 3.3.2 National policy emphasises the need to increase the provision of housing overall and in particular so as to achieve a wider choice and improve affordability. Thus, whilst it is the intention of Government policy that Local Authorities should decide their own housing targets, these must continue to be justified by robust evidence. This point was emphasised in the CLG Guidance dated 6 July 2010 (pursuant to the purported abolition of RS). National policy (PPS12 para. 4.52) continues to require Core Strategies to be "justified, effective and consistent with national policy". 3.3.3 PPS3 identifies the range of considerations that need to be taken into account in determining the appropriate level of housing at Local Authority level. Para 33 states: "Regard should be had to evidence including Strategic Housing Market Assessments, the latest Household Projections, Strategic Housing Land Availability Assessments, affordability and the impact on infrastructure". 3.3.4 In light of the Council’s proposal to reduce significantly housing provision in the district, it is therefore instructive to compare the results of recent Household Projections published by the government. Sub National Household Projections 2004 Base - Wealden Household Growth 2006 - 2026 +14000 Wealden Household Growth 2006 - 2030 ** N/A 2006 Base - Wealden Household Growth 2006 - 2026 +14000 Wealden Household Growth 2006 - 2030 ** N/A 2008 Base - Wealden Household Growth 2006 - 2026 +12000 Wealden Household Growth 2006 - 2030 ** +15000 ** Interpolation of 2028 and 2033 projections 3.3.5 Thus it can be seen that whilst the latest projections imply a slightly lower level of household generation than at the time the South East Plan was issued, the projection still substantially above the housing provision included in the South East Plan, and therefore even higher than that proposed in Policy WCS1. 3.3.6 Using the 2008-based data and adding a 3% allowance for vacancies indicates a locally-generated demand within Wealden District of 15,450 over the Plan period. 3.3.7 At para. 3.10 of the Core Strategy, the Council identifies a trend-based projection of 16,800 households slightly higher than this. Based on the lower of the two figures, the Council proposes to make provision for only 62% of the requirement. 3.3.8 Furthermore, the Council has not provided any robust evidence as to why a higher figure should not be proposed. Moreover para. 3.10 of the Core Strategy confirms that suitable, available and achievable sites to meet this need have been identified in the SHLAA. 3.3.9 Accordingly we submit that Policy WCS1 is unsound and that a housing provision of at least 550 dpa (13,200 over the period 2006 - 2030) should be proposed.

Details of Changes to be Made:
Increase housing provision to at least 550 dwellings per annum
Details of Reasons for Soundness/ Legal Complaince:

Housing target is not justified by robust evidence. It fails to comply with the South East Plan. SECTION FIVE - HOUSING PROVISION 5.1 In this Section we set out our comments in response to Policy WCS1 and specifically regarding the provision of homes. 5.2 Policy WCS1 proposes a provision of 9,600 dwellings in Wealden District over the period 2006 - 2030, equivalent to 400 dwellings per annum (dpa). This represents a locally-derived target which is explained in para. 3.11 of the Consultation document to be based on estimates of capacity and community aspirations. This proposed level of provision must be compared with the intention of the South East Plan whereby housing provision of 550 dpa was proposed. 5.3 National policy emphasises the need to increase the provision of housing overall and in particular so as to achieve a wider choice and improve affordability. Thus, whilst it is the intention of Government policy that Local Authorities should decide their own housing targets, these must continue to be justified by robust evidence. This point was emphasised in the CLG Guidance dated 6th July 2010 (pursuant to the purported abolition of RS). National policy (PPS12 para. 4.52) continues to require Core Strategies to be "justified, effective and consistent with national policy". 5.4 PPS3 identifies the range of considerations that need to be taken into account in determining the appropriate level of housing at Local Authority level. Para. 33 states: "Regard should be had to evidence including Strategic Housing Market Assessments, the latest Household Projections, Strategic Housing Land Availability Assessments, affordability and the impact on infrastructure." 5.5 In light of the Council's proposal to reduce significantly housing provision in the District, it is therefore instructive to compare the results of recent Household Projections published by the Government. Sub National Household Projections Wealden Household Growth 2006 - 2026 Wealden Household Growth 2006 – 2030** 2004 Base + 14,000 N/A 2006 Base + 14,000 N/A 2008 Base + 12,000 + 15,000 ** Interpolation of 2028 and 2033 projections 5.6 Thus it can be seen that whilst the latest projections imply a slightly lower level of household generation than at the time the South East Plan was issued, the projection is still substantially above the housing provision included in the South East Plan, and therefore even higher than that proposed in Policy WCS1. Other indicators (national and local) similarly point to a need for housing provision at a higher level. 5.7 Using the 2008-based data and adding a 3% allowance for vacancies indicates a locally-generated demand within Wealden District of 15,450 over the Plan period. 5.8 At para. 3.10 of the Core Strategy, the Council identifies a trend-based projection of 16,800 households, slightly higher than this. Based on the lower of the two figures, the Council proposes to make provision for only 62% of the requirement. 5.9 Furthermore, the Council has not provided any robust evidence as to why a higher figure should not be proposed. Moreover para 3.10 of the Core Strategy confirms that suitable, available and achievable sites to meet this need have been identified in the SHLAA

Details of Changes to be Made:

5.10 Accordingly we submit that Policy WCS1 is unsound and that a housing provision of at least 550 dpa (13,200 over the period 2006 - 2030) should be proposed. Increase housing provision to at least 550 dwellings per annum
Details of Reasons for Soundness/ Legal Compliance:
The land along Benhall Mill Road is unsuitable for a number of reasons. The road is too small to accommodate any more traffic. As access to schools in southern TW is severely restricted, where would any children go? The southern route down BMR is a single track. Basic services, such as water, electricity and gas, plus waste water and rubbish collection would be difficult to handle - who would be responsible for this and do you propose to send school buses and rubbish lorries down a single track road - or inflict them on the already congested roads of TW. There are no shops, pubs or any other facilities in the area. With regard to the site at the top of BMR, 063/1610 or Frant site A, this is shown as agricultural (last time it was a brown field site - get the designation right), this is infact an old fashioned meadow and has been since the last ice age. It has also been an SNCI for a number of years. I understand that there has been a suggestion to remove the SNCI designation as the ecological value has declined. It has declined because the present long term owner has been negligent in his responsibilities in maintaining the site. Is there not some sanction that can be applied for the failure to maintain the site under the SNCI rules?

Details of Changes to be Made:
The overall housing requirement to be met at land adjacent to Tunbridge Wells boundary (within Frant Parish) should be increased in line with our separate but related objections set out in response to Policy WCS1. Accordingly Land at Little Mount Farm, Benhall Mill Road, Tunbridge Wells shown on the inset to the Key Diagram as a new housing allocation for development to the higher level of 192 dwellings (including affordable housing), given the acute housing supply shortfall in this part of the District.
Details of Reasons for Soundness/ Legal Compliance:

The planned growth and distribution in the Core Strategy requires additional education provision and a number of transport interventions identified as critical in the Infrastructure Delivery Plan (IDP). There is at this stage, a level of uncertainty about their deliverability. County Council advice on education provision needs to be updated due to variations made to the spatial distribution of growth in the agreed Wealden District Council Submission Strategy. It should however, be possible to provide this update before the IDP is submitted in support of the Core Strategy at Public Examination. There has not been enough time so far for transport interventions to have been appropriately designed and costed, so there is a risk that they could fail to be delivered, either because the cost (once assessed) exceeds the available funding identified, or because the intervention itself proves unacceptable. The County Council is willing to work closely with Wealden District Council to narrow and resolve the risks identified and deliver the Strategy. Although risks are present in the delivery of infrastructure to support the proposed distribution they are not so unreasonable to make the strategy unsound because WCS7 provides a fundamental safeguard on the effective provision of infrastructure by making the release of land for development conditional upon infrastructure capacity being assured. Also WCS5 identifies that the results of reviews of the IDP may require an adjustment in the pace of housing delivery.

Details of Changes to be Made:
Details of Reasons for Soundess/ Legal Complaince:

A ‘sound’ Core Strategy must contain evidence of the views of the local community and others who have a stake in the future of the area. Public comments on the Issues and Options Paper support a general approach within which 30% of new dwellings are allocated to rural areas. This would reflect the existing distribution of the population within the district as seen in the Wealden Profile 2009, a Core Strategy Spatial Development Options Background Paper, which states that of Wealden District’s total population, 19% live in town fringe settlements, and 32% live in villages, hamlets or isolated rural settlements. The draft Core Strategy currently states that an additional 4685 dwellings will be delivered in the period up to 2030. 30% of these dwellings is approximately 1405, greatly in excess of the provision made by WCS6 for at least 455 dwellings. It is submitted that a greater level of provision be made to the district as a whole, in addition to a greater level of provision made to rural areas under Policy WCS2 as the draft Core Strategy does not currently reflect the community’s views. In addition the draft Core Strategy is not consistent with national policy by neglecting to allocate a greater number of dwellings to rural areas. The Council should, as Planning Policy Statement 1: ‘Delivering Sustainable Development’ informs “Ensure that plans are drawn up over appropriate time scales, and do not focus on the short term or ignore longer term impacts and the needs of communities in the future.” (para. 26 ii). Planning Policy Statement 7 ‘Sustainable Development in Rural Areas’ informs that the Council “should make sufficient land available, either within or adjoining existing villages, to meet the needs of local people” (para.9 i) The draft Core Strategy does not reflect public opinion or the existing development pattern within the district which could lead to valuable local services in rural areas being lost in the longer term. Given the lack of environmental constraints such as article 15 land and the availability of suitable housing land identified within the SHLAA and the availability of existing local services and facilities it is considered that the Uckfield and Maresfield area could accommodate a higher proportion of growth. This has was previously recognised by the Council in the Non-Statutory Local Plan (2005) with significant allocations located in both settlements. The overall distribution of housing proposed in WCS2 is deficient as it does not take account of public consultation responses, pay regard to the current distribution of the population and the availability of existing local services and facilities and is not consistent with national policy.

Details of Changes to be Made:

WCS2 Distribution of Housing Growth 2006-2030 Land will be allocated to meet the housing provision of WCS1 in accordance with the following distribution. Town/Settlement Built or already committed (dwellings) New allocations (dwellings) Total dwellings (2006 – 2030) Rural villages 918 3732 4650 Total Wealden 4889 10611 15500 N.B the remaining 6897 new dwellings will be distributed to Uckfield, Hailsham & Hellingly, Polegate & Willingdon, Stone Cross & Westham, Crowborough, Heathfield & Waldron and adjacent to Tunbridge Wells boundary (within Frant Parish) at the Council’s discretion taking note of the environmental constraints of certain locations.
Details of Reasons for Soundness/ Legal Compliance:

WCS2 We support the principle set out here, but would hope that provision should be made for the later years targets to be reduced in future to take account of windfall sites as they develop.

Details of Changes to be Made:

The housing distribution figures should accord to the robust RSS population figures and therefore the additional 3600 dwellings should be spread 40% Hailsham/Hellingly, 40% Polegate Stone Cross and 20% to remaining settlements. Ie. 40% of 3600 equals 1440 additional dwellings required for the North Hailsham area.

Details of Changes to be Made:

To ensure a sustainable distribution of the additional housing across the District.
Details of Reasons for Soundness/ Legal Complaince:

In supporting the settlement hierarchy, including the categorisation of the village of Horam as a Local Service Centre, we further support the proposed distribution of dwellings as outlined in Spatial Strategy Policy WCS2 - Distribution of Housing Growth 2006 - 2030. In a District such as Wealden where "the rural areas outside of the main urban areas cover almost 93% of Wealden District. And contain around 50% of its population" (para 6.43 of the Core Strategy) it is important to provide sufficient housing in rural areas. Therefore we support the identification of at least 455 new dwellings within Rural Villages, of which Horam is one of thirteen. As outlined in para 8 of PPS7: Sustainable Development in Rural Areas "It is essential that local planning authorities plan to meet housing requirements in rural areas, based on an up to date assessment of local need. To promote more sustainable patterns of development and make better use of previously developed land, the focus for most additional housing in rural areas should be on existing towns and identified service centres." We consider that the village of Horam is a sustainable location which is capable of accommodating the largest percentage of the 455 new allocations within the Rural Villages (as discussed in representation made to WCS6 - Rural Area Strategy) in accordance with the principles of PPS7. The suitability and acceptability of development in Horam is discussed within the supporting Sustainability Appraisal and the accompanying Background Paper 3, in which the Authority has undertaken individual sustainability appraisals of the settlements within the settlement hierarchy in order to assist in identifying those which are capable of accommodating future growth. At Paragraph 7.3 of the Sustainability Appraisal it is noted that not only do the assessments utilise the "Information that underpins the settlement hierarchy including accessibility to services and facilities and the relative public transport accessibility links with other settlements offering a range of services, facilities and the relative public transport accessibility links with other settlements offering a range of services, facilities and employment" but also includes "environmental factors including proximity to ecological conservation areas, the potential for the use of greenfield land and potential for flood risk and water quality issues" as well as economic data based upon "the presence of significant employment opportunities, business areas and tourism opportunities as well as economic indicators at the Parish level including average household income and education attainment". Using the holistic approach and as illustrated within Table 7.2 of the Sustainability Appraisal, Horam is highly ranked in the sustainability hierarchy in terms of Social, Environmental and Economic categories. Although there are settlements which sit higher in the settlement hierarchy, the merits and constrains within the Sustainability Appraisal has rightly recognised that Horam is capable of accommodating development. This is further noted at paragraph 7.19 of the Sustainability Appraisal which states that "Rotherfield, Horam and East Hoathly perform well in sustainability terms and feature higher in the SA hierarchy, due to strong social and economic assessments". Overall, we support the distributions of dwellings as outlined in Spatial Strategy Policy WCS2 - Distribution of Housing Growth 2006 - 2030, in particular the allocation of at least 455 dwellings within the rural area. Furthermore, we support the identification of Horam as being able to accommodate the largest proportion of the 455 dwellings and in particular the opportunities available through the redevelopment of the Former Merrydown Cider site within the Local Service Centre of Horam as a mixed use scheme. This will assist the Authority in meeting both the objectives in the national planning policy and SPO14 in that it can deliver at least 70% of Horam's housing requirement (100 units), as outlined in representations to Strategic Policy WCS6 - Rural Area Strategy, on Brownfield land.

Details of Changes to be Made:
1. The Core Strategy is not legally compliant and is unsound because of its proposals for an urban extension to the north west of Heathfield (Strategic Development Area SD11). Whilst the principle of accommodating housing growth in the broad location of north west Heathfield is supported, the Core Strategy’s proposals are deficient because they: (a) fail to take a comprehensive approach to the development of this area and so are not founded on a robust and credible evidence base and are not the most appropriate strategy when considered against the reasonable alternatives in this location, thus failing the soundness test in paragraph 4.36 of PPS12 that they are “justifiable”. (b) constitute an unjustified encroachment into the High Weald AONB and so are not the most appropriate strategy when considered against the reasonable alternatives in this location, thus failing the same “justifiable” test in PPS12 and also the soundness test in paragraph 4.52 of PPS12 that they are “consistent with national policy”. Paragraph 16(v) of PPS7 requires the Council in preparing the Core Strategy to “conserve sites of landscape…value, in accordance with statutory designations”. Paragraph 22(ii) of PPS7 requires that “major developments” should only take place within the AONB after “the most rigorous examination” and an assessment of “the scope for developing elsewhere outside the designated area or meeting the need for it in some other way”. The Council has failed to properly assess the scope for meeting the need for development on previously developed land at north west Heathfield that is not in the AONB. (c) utilise less accessible and less sustainable land and so are not the most appropriate strategy when considered against reasonable alternatives in this location, thus failing the same “justifiable” test in PPS12. (d) fail to provide adequate safeguarding of amenities of existing dwellings (if those dwellings are to be excluded from the urban extension as currently proposed) and fail to integrate into the existing urban form, thus failing the soundness test in paragraph 4.52 of PPS12 that the proposals are consistent with national policy. Paragraph 34 of PPS1 and paragraph 13 of PPS3 require the Council to reject design which is “inappropriate in its context” and paragraph 35 of PPS1 requires development to be designed so that it will be “integrated into the existing urban form and the natural and built environments”. THE PROPOSED SUBMISSION CORE STRATEGY 3. We object to the following parts of the Core Strategy. Because the objections are interconnected, we have set out all the relevant matters in this response, although this particular objection only relates to the specific part of the Core Strategy identified in our response to Q1 above. Our objections are as follows: (i) The omission from Spatial Planning Objective SPO1 of any reference to minimising the loss of nationally designated landscapes, including the High Weald AONB. Paragraph 16(v) of PPS7 requires the Council to conserve the AONB and since it is clear that the Council is proposing to meet part of the District’s development needs by using land within the AONB, the Council should establish a clear objective that only the minimum AONB land should be used for this purpose and wherever possible non-AONB land should be used in preference. (ii) The reference in Policy WCS2 to the broad locations for housing development being shown as insets on the Key Diagram. We object to the inset for Heathfield in relation to the way it shows the proposal SD11 and consequently object to this reference to that inset plan in Policy WCS2. (iii) The reference in Policy WCS4 to SD11: Land at North West of Heathfield. We object to the way that SD11 is described in Chapter 6 of the Core Strategy and shown on the Key Diagram and as a result object to the reference to SD11 in Policy WCS4. (iv) The omission from paragraph 5.8 of any aim to maximise the use of previously developed land in meeting existing and future housing needs. Notwithstanding the recent changes to PPS3 it remains a national objective to prioritise the use of previously developed land, in accordance with paragraph 21 of PPS1 and paragraph 40 of PPS3. (v) The reference in paragraph 6.40 to the identification of potential sites for housing “through the SHLAA”. We object to the inclusion of Site 155/1210 in its current form as shown in the SHLAA and consequently object to this reference to that site in paragraph 6.40. (vi) The reference in paragraph 6.41 to the “most suitable location” being “within the AONB” and that this land could be developed “without strategic adverse impact on the landscape”. The Council’s evidence base does not demonstrate that the land within the AONB is more suitable for development than the non-AONB previously developed land on High Street. There is no assessment by the Council of the suitability of this non-AONB land (which includes the objector’s land at Lavender Cottage, High Street, Heathfield, TN21 0UP) and yet it is more suitable than the AONB land, being (i) not subject to a national landscape designation, (ii) previously developed land, (iii) within the existing settlement boundary, and (iv) well related and integrated into the urban area and existing transport connections. In addition, the Council’s evidence base does not show that 160 dwellings can be provided in the AONB without strategic adverse impact on the landscape. The capacity of 160 dwellings for SD11 would appear to derive from the assumed capacity of 2 adjacent SHLAA sites at north west Heathfield.
155/1210 with a capacity of 123 dwellings at 40 dph and Site 307/1210 with a capacity of 35 dwellings at 35 dph). The Council's Landscape Character Assessment (February 2009) shows at Figure 5 that large parts of these SHLAA sites are required to be retained as open space to provide a "landscape buffer" to Tilsmore Wood. If those buffers are to be provided as recommended in the Landscape Character Assessment, the SHLAA sites will not be able to deliver the required capacity, without radical changes to the assumed density, and there has been no assessment of the impact of higher density development on the AONB and on the landscape setting and character of Tilsmore Wood. The claim therefore that SD11 can be achieved without strategic adverse impact on the AONB is not supported by the evidence base. (vii) The reference in paragraph 6.41 to the release of AONB land being justified "as no suitable alternative non-AONB location exists". The Council's evidence base does not substantiate this assertion. The Council has not assessed the suitability of the non-AONB land in this location which fronts High Street (including the objectors' land at Lavender Cottage). This non-AONB land is within the settlement limits of Heathfield as identified on the Proposals Map of the saved Local Plan and paragraph 6.48 of the Core Strategy confirms that within development boundaries "the principle of development is acceptable". The principle of redeveloping this land to provide more intensive residential development has already been accepted by the Council, with the grant of planning permissions at Brackenside (WD/08/0329) for 3 dwellings in place of 1 dwelling, and at Oaksdown/Lowlands (WD/2011/0400) for 9 apartments in the place of 2 dwellings. The more intensive development of the non-AONB land on the High Street frontage would minimise (or may even remove) the need for the use of AONB land. This option would plainly be a more suitable alternative than the use only of land "within the AONB" as proposed in the Core Strategy. (viii) The reference in paragraph 6.41 to "no suitable alternative contingency land is available". The land at Oaksdown/Lowlands is available for development (as confirmed by the recent renewal of planning permission). The objectors' land at Lavender Cottage is available for development (and this has been made known to the Council since at least August 2010). The land at Woodhatch is relied on as being available for development in order to provide the access for SHLAA site 155/1210. The objectors understand that the land at Holmhurst could be made available for development. Thus, there is a continuous frontage of 5 plots of non-AONB land available (all with generous areas of garden land, most of which is excluded from the AONB) just on this part of the High Street. Were the Council to actively promote a comprehensive redevelopment of this area it is likely that other land in the vicinity would be made available. However, the Council has simply failed in its evidence base to assess this option. If it is necessary to identify contingency land then the hinterland of AONB land should be identified as contingency land, with priority being given to the development of the non-AONB land on the High Street frontage. Prioritising that land would be consistent with the policy objectives of minimising the loss of AONB land and maximising the use of previously developed land. (ix) The reference in paragraph 6.42 item 3 to SD11 being "on land adjacent to the urban area". The proposal for SD11 should not be defined in a way which excludes the urban area and which focuses only on land within the AONB. The proposal should embrace the urban area and the development should maximise the use of previously developed land in the urban area to achieve the provision of 160 dwellings before any consideration is given to the use of land in the AONB. (x) Figure 10 Heathfield Area Strategy. This diagram shows SD11 as located within the AONB and beyond the existing settlement. The diagram should not exclude the inclusion of the existing built up area in this location within the scope of SD11. The built up area has the potential and the capacity to be redeveloped and this aim should be the first priority at north west Heathfield. (xi) Key Diagram: the inset for Heathfield. The inset shows Heathfield and Proposal SD11 in the same way that they are shown on Figure 10 and they are not acceptable for the same reason set out at (x) above. 4. We now propose to elaborate on these objections. Piecemeal not comprehensive 5. SD11 takes an opportunistic approach. It utilises substantial areas of greenfield land as the main development areas (and by implication from the SHLAA one existing property simply as a means of access). Although the SHLAA indicates that Site 155/1210 is in multiple ownerships and Site 307/1210 is owned by a company with 7 shareholders, the choice of this location seems to be influenced simply by the fact that these 2 sites were promoted in the SHLAA and so it is assumed they are available. Site 155/1210 is said to be under the control of a housing developer. We are not aware whether the Council has seen the terms of any option or other legal agreement giving such control but, given that the Proposed Submission Core Strategy is a long term strategy to 2030 and its trajectory does not anticipate the site coming forward before 2015/16, little weight can be given to the status of any current contractual arrangements. 6. Any sensible spatial planning approach to the development of this area would not look at the sites promoted in the SHLAA in isolation but would look to see how that development would relate to its local context and how it would relate to the settlement it is intended to form a part of. 7. The site of SD11 is on sloping ground set back behind existing development which separates the site from the rest of Heathfield. Development as proposed will not integrate the development with its local context as required by paragraph 35 of PPS1. Nor will it maximise the opportunities for the site to benefit from clear and easy links to the facilities in the local service centre by non-car modes. 8. A comprehensive approach would look at the whole of the area in this north western part of Heathfield and then seek to identify the land which is most suited to development. It is common sense that this would start by looking at the land with the best links by foot, cycle, and public transport to the rest of the settlement. That is of course the frontage land along Heathfield Road/High Street itself. The frontage land also contains the previously developed land comprising the existing dwellings and their various outbuildings. Whilst the recent revisions to PPS3 have removed garden land from the definition of previously developed land, the footprint of the buildings and their associated driveways and hardstandings clearly have a higher priority for development than a greenfield meadow. 9. The present objectors, as the owners of Lavender Cottage, are willing to make their land available as part of a wider development. The objectors have
made this known to the Council since at least August 2010. The principle of redeveloping for more intensive residential development has already been established on land to the wets (WD/08/0329) and on the adjoining site to the east of Lavender Cottage (WD/2011/0400). Although planning permission was granted for a block of flats (WD/2008/0276), that development has not come forward and the permission has recently had to be renewed. Clearly, the land is available for development, even if the form of development is not at present attractive to the market. We understand that the owner of the adjoining plot at Holmhurst would be prepared to make that site available. Woodhatch is relied on as available in the SHLAA (Site 155/1210 refers). Thus there is already a substantial amount of the frontage land which is available for development. A spatial approach to the planning of this area would look to utilise this developed frontage land, which plainly has development potential, before turning to the undeveloped hinterland to the rear. Unjustified Encroachment into the AONB 10. The Proposed Submission Core Strategy recognises that SD11 lies within the AONB, where there is strict control over new development. Paragraph 22 of PPS7 is clear that major development in the AONB requires “the most rigorous examination” and that such development should only be accepted after assessment of the scope for meeting the need elsewhere. Under the GDMO 2010 “major development” is a development of 10 or more dwellings. Under the Secretary of State’s arrangements for the recovery of appeals on the basis that they are large/controversial, the threshold is 150 residential units. On either basis, a development of 160 dwellings is major development. In any event, the Council has accepted in the SHLAA that “there is a requirement to demonstrate development is essential to meet local needs and that other more suitable sites do not exist elsewhere” (Site 155/1210). The claimed rationale for the use of AONB land in this case is that “no suitable alternative non-AONB location exists”. This is patently incorrect. As already noted, the frontage land is not within the AONB and if the desire is to achieve a development of some 160 dwellings there can be no justification for taking more AONB land than is absolutely necessary when there is non-AONB land in the same location which is available. 11. Whilst it may be doubtful that the frontage land which is known to be available could alone accommodate the full scale of the development sought, the need to encroach into the AONB would be very much reduced if the frontage land was used first. Such an approach would also enable the lower (and least accessible) parts of the meadow to be retained as open land, potentially providing a better buffer with the important woodland at Tilsmore Wood that makes up such a key component of the Wealden character. The need for such a buffer is recognised in the Landscape Character Assessment (Figure 5). In addition, if the Council made it clear that it was promoting the comprehensive development of the area, it is likely that other owners would also wish to make their land available, and the Council may therefore be able to avoid encroaching into the AONB to any material degree. 12. The Council’s claim that 160 dwellings can be provided in the AONB without strategic adverse impact on the landscape is not supported by the evidence base. The capacity of 160 dwellings for SD11 would appear to derive from the assumed capacity of the 2 adjacent SHLAA sites:Site 155/1210 and Site 307/1210. As already noted, the Council’s Landscape Character Assessment shows (Figure 5) that large parts of these SHLAA sites are required to be retained as open space to provide a “landscape buffer” to Tilsmore Wood. If those buffers are to be provided as recommended in the Landscape Character Assessment, the SHLAA sites will not be able to deliver the required capacity, without radical changes to the assumed density, and there has been no assessment of the impact of higher density development on the AONB and on the landscape setting and character of Tilsmore Wood. The claim therefore that SD11 can be achieved without strategic adverse impact on the AONB is not supported by the evidence base. Using Less Accessible and Less Sustainable Land 13. Similar considerations in terms of minimising the amount of AONB land apply in relation to accessibility issues. The lower parts of the sloping meadow land are not only more remote by simple distance from the footways and bus route along Heathfield Road/High Street, there is also the fact that journeys from home will inevitably be uphill for residents of that area. There will therefore be a disinclination to use non-car modes for accessing local services, even if they might appear to be within walking distance. It must also be doubted whether much of the hinterland is within the preferred 400m distance for access to a bus route. 14. In contrast, the frontage development is already connected to existing pedestrian routes by the adjacent footways and there is only a shallow fall in the land closest to the roadside. Accessibility to the bus route is also much improved. 15. Again, on any sensible measure of accessibility and sustainability, it cannot make sense to use the more remote hinterland in preference to the frontage land. PPS1 is clear at paragraph 35 that new development needs to be integrated into the urban area and address connectivity issues. The choice of a backland location for SD11 when the more accessible frontland is available is directly contrary to this guidance Inadequate safeguarding of amenities 16. We have already explained why a comprehensive approach needs to be taken to this area. However, if the Council persists in its piecemeal approach then it is apparent that inadequate consideration has been given to the relationship between the retained frontage properties and the new development to the rear. The existing development is at a very low density and has the established character of a mature residential area, with individual dwellings in spacious plots. 17. The SHLAA indicates a proposed density for the new development of some 40 dwellings per hectare for Site 155/120. This will be substantially different in character and could only be achieved by ensuring a substantial buffer between the 2 very different forms of development. However, this would push the new development further into the AONB and would further separate the new development from the settlement of which it is intended to form a part. Again, there would be a conflict with the advice in PPS1 on integrating the development with the urban area. Soundness Tests 18. It is clear from the objections set out above that the proposals for SD11 are not founded on a robust and credible evidence base, cannot be shown to be the most appropriate strategy when considered against the reasonable alternatives, and are not consistent with national policy in PPS1, PPS3, and PPS7 in several important respects. They therefore fail
2 of the key tests of soundness as set out at paragraph 4.52 of PPS12. Legal Tests 19. These objections also have the consequence that the Council’s failure to properly consider reasonable alternatives to its proposals at north west Heathfield, and in particular to consider the alternative of an area of growth in this location planned on a comprehensive basis and focused on maximising the use of previously developed land and minimising the use of land within the AONB, has the consequence that the Sustainability Appraisal/Strategic Environmental Assessment that accompanies the Core Strategy is legally deficient and the Core Strategy is consequently not legally compliant with the requirements of either Regulation 5(1) of the Environmental Assessment of Plans and Programmes Regulations 2004 or with the requirements of s.19(5) and s.20(2) Planning & Compulsory Purchase Act 2004. In addition, the same failings, together with the lack of a credible and robust evidence base to support those proposals and the conflicts with national policy mean that the Core Strategy is not “sound” as required by s.20(5)(b) PCPA 2004. 20. The SA/SEA considers, in broad terms, alternative locations for growth at Heathfield as between the north east, north west, and west of the town. However, what it fails to do is to look at reasonable alternatives within the selected north west location. It is no answer for the Council to suggest that this level of detail is a matter for a later DPD because the Core Strategy is already spatially specific that the location of north west Heathfield is an “urban extension” (i.e. an addition) and that it is “within the AONB” (i.e. outside the settlement boundary). The same spatial approach is shown on Figure 10 and on the Inset for the Key Diagram. The Council is not, therefore, able to avoid grappling with the spatial implications of this choice as part of the Core Strategy and testing it against reasonable alternatives. However, it is clear that this is not an exercise that has been attempted in the SA/SEA. 21. The Council will be well aware from the recent decision in Save Historic Newmarket Ltd v Forest Heath District Council [2011] EWHC 606 (Admin) that a failure in the SA/SEA to give proper consideration to identification and assessment of reasonable alternatives is likely to result in a quashing of the relevant parts of the Core Strategy. Conclusion 22. For all of these reasons the objectors strongly suggest that neither the Council nor the Inspector should endorse the present proposals for SD11. What is required is a fundamental rethink to achieve an integrated, sustainable and accessible development which minimises the impact on the AONB and provides a comprehensive spatial approach to the development of this area. Essentially this requires the focus to shift from the “easy target” of greenfield meadows to a more considered approach, giving priority to the previously developed frontage land, and only considering the AONB hinterland to the minimum extent necessary to achieve the required dwelling numbers.

Details of Changes to be Made:
If the Heathfield Inset to the Key Diagram is changed as per my other objections to replace the Heathfield Inset with a version of Figure 10 revised to remove the red/pink notation and replace it by a red dwelling house symbol located within the urban area to the immediate north of the A265, and replace the text annotation by the words “Comprehensive development area at north west Heathfield (SD11) (residential provision)”, no change is necessary. Otherwise, delete the sentence “Broad locations…Key Diagram”.

Details of Reasons for Soundess/ Legal Complaince:
The housing distribution figures should accord to the robust RSS population figures and therefore the additional 3600 shouls be spread 40% Hailsham/Hellingly 40% Polegate/ Stone Cross and 20% to Uckfield.

Details of Changes to be Made:
To assure sustainable distribution of additional housing across the District
Representation ID
4
Person ID  MR  HUTCHISON  Agent ID
316236
WCS2 Distribution of Housing Growth 2006-2030  Policy 2

Sound  ☑ Yes  ☐ No  ☐ Justified  ☐ Effective  ☐ Consistent with national policy
Legally Compliant  ☑ Yes  ☐ No

Details of Reasons for Soundess/ Legal Complaince:

As I see it the aim of the Strategy is to increase the economic, environmental and social well-being of the people in the District. This will not be achieved by the disproportionate distribution of housing proposed. It's ludicrous to continue loading the bulk of new housing into the over-crowded Low Weald Towns of Hailsham, Stone Cross, Polegate and Uckfield which already have social and economic problems created by poorly-planned over-expansion. The large increases in housing numbers in these towns are, as before, likely to be large housing estates built by national developers on greenfield sites. This will contribute to car journeys, take out valuable agricultural land and thus contribute to carbon footprint. Most of the profits from the development will go to the management and shareholders of these national companies and will be lost to the local economy. Current experience shows that local businesses do not greatly benefit from such developments as people chose to drive to out-of-town shopping centres and many commute outside the District to work. Meanwhile the town centres are full of closed-down shops which should have been used for new housing.

Details of Changes to be Made:

It is the smaller towns and settlements of our District, dying on their feet due to lack of key workers, families and young people as well as the town centres, full of empty shops, which are in most need of housing development. Housing development in such instances is likely to be small-scale and therefore local developers are likely to carry out the building which will benefit the local economy. In the larger towns it is likely to be located close to the town centre, where it could use the increasing number of disused retail sites, thus reducing car journeys and carbon footprint and contribute to the economy and social cohesion. I consider that the allocation of new housing should be spread across ALL towns and settlements in the District, in proportion to the existing numbers of houses.
Details of Reasons for Soundess/ Legal Complaince:

Eastbourne Borough Council acknowledges the level of growth being proposed in Wealden and the role that the proposed urban extensions in the south of the District will play in the future development of Eastbourne. The distribution of new residential development in the southern part of Wealden (1,300 at Hailsham/Hellingly; 650 at Stone Cross; and 700 at Polegate/Willingdon) may assist Eastbourne’s future economic growth and represents an appropriate balance across the different communities in this part of the district. It is, however essential that a green gap is provided between the proposed growth at Stone Cross and the existing edge of Eastbourne to ensure that the distinct identities between the settlements are maintained. This is particularly important in relation to the proposed South and South East extension to Stone Cross (SD6), which is very close to residential areas in Eastbourne. Eastbourne Borough Council believes it would not be appropriate for the South East extension to Stone Cross (SD6) to extend south of the railway line. In recent years, residential completions in Eastbourne have been formed by a high proportion of flats rather than houses. Many of these have involved the conversion or sub-division of existing properties and there has been an over-reliance on windfall sites to meet Eastbourne’s annual housing target established in the South East Plan. It is likely that this pattern of development will continue and it is therefore considered to be sensible that the housing provision in the southern part of Wealden and in Eastbourne are not considered in isolation from one another. Wealden is better placed to provide the majority of the larger family dwellings which will complement the higher density apartment units in Eastbourne. The proposed distribution established in Policy WCS2, which focuses development in the District’s principal towns and on the urban fringe of Eastbourne is considered to represent an appropriate balance, on the basis that it is supported by the key infrastructure requirements established in the accompanying Infrastructure Delivery Plan (IDP). The importance of the IDP and its recommendations and requirements cannot be underestimated. Failure to provide sufficient mechanisms for the delivery of essential infrastructure to support housing and employment development has the potential to cause serious problems both within Wealden and in neighbouring local authorities. This issue is likely to be particularly acute in the areas close to the District’s boundary with Eastbourne where a large proportion of the proposed new dwellings and employment areas are proposed, and where serious infrastructure deficiencies have already been identified. It is therefore imperative that the key infrastructure requirements are continually assessed and updated throughout the period up to the formal adoption of the Core Strategy. They will then subsequently need to be monitored and reviewed and it is important that Eastbourne Borough Council and Wealden District work effectively together to ensure that the growth is delivered in an effective way that does not have a detrimental impact on the existing residential community and businesses. Whilst it is acknowledged that the figures in the table depicted in Policy WCS2 will change between now and final adoption of the Core Strategy, it would be very helpful if the Policy included an additional column showing the breakdown of housing completions and commitments up to the end of the most recent monitoring period (i.e. 31st March 2010).

Details of Changes to be Made:
Representation ID
88
Person ID  Ms  Van-Gils
336229
Agent ID  Mr  Court
519713
Peter Court Associates

WCS2 Distribution of Housing Growth 2006-2030  Policy 2

Sound  ☐ Yes  ☑ No  ☑ Justified  ☑ Effective  ☑ Consistent with national policy
Legally Compliant  ☐ Yes  ☐ No

Details of Reasons for Soundess/ Legal Complaince:
In light of the objection to policies SPO3 and WCS1, the total provision of housing as set out in this policy is inadequate to meet the District's forecast requirements. This policy is thus unsound. It is not proposed to offer a specific distribution of the requisite figure of 17,300 additional dwellings, although each of the towns and other settlements could all be afforded increases in housing provision. Objection is, however, made to the inadequacy of the proposal to permit just an additional 455 dwellings to the Rural Villages. It is therefore proposed that this is substantially increased, with Mayfield being separately identified as capable of accommodating an appropriate element of this increase.

Details of Changes to be Made:

Representation ID
771
Person ID  Mr & Flittner
106034

WCS2 Distribution of Housing Growth 2006-2030  Policy 2

Sound  ☐ Yes  ☑ No  ☑ Justified  ☑ Effective  ☑ Consistent with national policy
Legally Compliant  ☐ Yes  ☐ No

Details of Reasons for Soundess/ Legal Complaince:
This policy fails the SHLAA and other planning criteria as most of the proposed allocated sites have deliverability problems, being either unavailable, undeliverable through access or infrastructure problems, or are in unsustainable locations. These matters are detailed in the separate objections to specific areas, which should be read in conjunction with this objection. But briefly these are: Uckfield, the chosen site has no access, is unavailable, would cause massive town centre congestion. Hailsham and Hellingly, sites are unsustainable as there is no rail transport, undeliverable due to sewage treatment problems, insufficient local employment and car travel only option to overcome this. Polegate and Willingdon undeliverable due to sewage treatment problems. Rural Areas. Village allocations far too low leaving villages to die and just become dormitories for the rich and retired and car owners. Also in particular Maresfield due to the adjacent Ashdown business Park should have a much larger allocation to enable people to live where they work and reduce car travel. This policy also shows what a farce the council have made of the SHLAA, for which there is no challenge objection process, nor does it appear to be independently checked or inspected. The whole point of the SHLAA was to identify land that was deliverable, so allocations could be made from this land. Yet WDC seems to have the opposite and chosen land that is neither available and or deliverable. Also the SHLAA seems to have been completely inconsistently administered, so far instance many sites or villages of very similar nature have very different outcomes in the SHLAA

Details of Changes to be Made:
Remove the undeliverable sites in Uckfield, Hailsham and Polegate and Willingdon. Increase the village allocations to 2000, as detailed in objections to WCS6 Additionally, change Maresfield to a Local Service Centre and additionally allocate 300 to 400 dwellings for reasons detailed in the objections to WCS2 and WCS6
Representation ID
742
Person ID Mrs Blowfield & I H Blowfield Agent ID
329127
WCS2 Distribution of Housing Growth 2006-2030
Sound ☐ Yes ☐ No ☐ Justified ☐ Effective ☐ Consistent with national policy
Legally Compliant ☐ Yes ☐ No
Details of Reasons for Soundess/ Legal Complaince:
Road network currently inadequate. Insufficient school places and health facilities. Insufficient water supplies.
Details of Changes to be Made:

Representation ID
732
Person ID Mr Shaw Agent ID
103076 High Weald AONB Unit, Woodlands Enterprise Centre
WCS2 Distribution of Housing Growth 2006-2030
Sound ☐ Yes ☐ No ☐ Justified ☐ Effective ☐ Consistent with national policy
Legally Compliant ☐ Yes ☐ No
Details of Reasons for Soundess/ Legal Complaince:
The Unit recognises and supports the overall commitment to protecting the AONB from new major development and the broad distributions of growth proposed within the Strategy. In particular the restraint shown around Crowborough both in response to the AONB and the Ashdown Forest SPA/SAC is supported given the vulnerability of the boundary around the town. Similarly the area around Heathfield is also vulnerable and has in general been given an appropriate level of constraint.
Details of Changes to be Made:

Representation ID
719
Person ID Mr Maunders Agent ID Mr Maunders
521073 Mr J Barnett 521070 Charles Maunders Consultancy Ltd
WCS2 Distribution of Housing Growth 2006-2030
Sound ☐ Yes ☐ No ☐ Justified ☐ Effective ☐ Consistent with national policy
Legally Compliant ☐ Yes ☐ No
Details of Reasons for Soundess/ Legal Complaince:
It is felt that for such a large and important town in the Wealden area 300 new homes over the 24 year period seems a little light and will not meet the housing needs of future generations. My clients land is capable of accommodating some 250 dwellings.
Details of Changes to be Made:
Summary of all Representations - Proposed Submission Core Strategy Regulation 27 - Report 11th July 2011

Representation ID
610

Person ID  Mr Wojtulewski BA 521946
Agent ID  Mr Wojtulewski 102618

WCS2 Distribution of Housing Growth 2006-2030 Policy 2

Sound  □ Yes □ No □ Justified □ Effective □ Consistent with national policy
Legally Compliant  □ Yes □ No

Details of Reasons for Soundess/ Legal Complaince:
Notwithstanding our serious concerns regarding Policy WCS1, my client is supportive of the principle of the proposed distribution of housing growth in the District identified in Policy WCS2. The approach adopted here adequately reflects the needs of the District's towns (identified in background documents such as the SHMA and BP2) whilst also taking into account the established settlement hierarchy and environmental and infrastructure constraints where appropriate. The South East Plan proposes that approximately 63% of Wealden District's new housing development be located in the defined Sussex Coast Sub-Region. The draft Core Strategy is in accordance with this as at present approximately 63% of new allocations (excluding rural areas) are within the Sussex Coast Policy Area. On this basis, we consider the general thrust of Policy WCS2 is, in accordance with paragraph 4.36 of PPS12, justifiable - it being founded on a robust and credible evidence base and the most appropriate strategy when considered against the reasonable alternatives. Nevertheless, in view of the concerns raised in respect of Policy WCS1, the level of the allocations identified for each of the settlements within the Policy should be increased to reflect the overall higher level of provision for the District.

Details of Changes to be Made:

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Representation ID
680

Person ID  Mr Beams 519685
Agent ID  Willingdon and Jevington Parish Council

WCS2 Distribution of Housing Growth 2006-2030 Policy 2

Sound  □ Yes □ No □ Justified □ Effective □ Consistent with national policy
Legally Compliant  □ Yes □ No

Details of Reasons for Soundess/ Legal Complaince:
WJPC is concerned at the numerous references to Polegate and Willingdon as one settlement, as highlighted in 3.3 Table 1, 3.11, SPO6, WCS2, WCS3, 5.13, 6.31(2), Figure 8 and Figure 12. In particular, Figure 2 showing settlement hierarchy, places Polegate and Willingdon as one settlement, yet details other settlements individually.

Details of Changes to be Made:
Representation ID
600

Person ID Mrs Green
Agent ID 104452

WCS2 Distribution of Housing Growth 2006-2030

Sound No
Legally Compliant No

Details of Reasons for Soundess/ Legal Complaince:
For Uckfield 3000 houses within the next 20 years seems excessive. The present lay-out of the town based on a long High Street where the standard of shops has deteriorated greatly within the past 10-15 years and shops in Framfield Road, all but disappeared, leads people to shopping elsewhere. With more houses an extension of the Sewage System will be necessary. A previous extension was in Ridgewood Farm land Ref 346/1410 an addition would mean less land there for houses. The suggested net dwelling capacity 1000 for the farm is too high (a total estimate of 1351 for the present 7 submitted sites). Increased facility for shops, public transport, doctors surgeries and schools must be carefully planned before further extensive housing is permitted. Already at times the High Street is gridlocked especially at rush hours. Many children are taken to school by car and from many estates people use their cars all the time, many commuting to work elsewhere. The use of brownfield sites and redevelopment of some existing property which is unused would reduce the endless incursion into the countryside as well as reducing the extension of estates outwoods and the need for people to drive. Water is another problem as increasing droughts and climate change, building reservoirs is not the answer if there is little rain e.g.2010. Although the Core Strategy may have considered some of these problems, the main concern seems to be increased numbers of houses which are not necessarily for local people but for incomers from elsewhere who may contribute little to the town or local community and may work elsewhere. 5 of the potentially suitable sites of the 7 submitted at present are in the Ridgewood part of Uckfield which has already had 7 estates built in the past 25 years putting great pressure on Lewes Road and the Highlands Roundabout. The proposed Thorn Crest (ref 006/1410) with exit through the presently being constructed Sandpits development, will put even more pressure onto Lewes Road, None of the estates built in recent years have made any provision for local shops (Manor Park built in the early ’60s being the exception). this means everyone has to go into Uckfield itself to shop or go outside. In Ridgewood we are fortunate to have our surviving Post Office and shop/newsagent.

Details of Changes to be Made:

Representation ID
593

Person ID Mr Lloyd MP
Agent ID 521924

WCS2 Distribution of Housing Growth 2006-2030

Sound No
Legally Compliant No

Details of Reasons for Soundess/ Legal Complaince:
Housing/Planning Inconsistencies With regard to the overall housing numbers proposed, if the Honey Farm planning appeal Honey Farm (APP/C1435/A/10/2130580) is successful, this will increase your numbers of dwellings in the Polegate and Willingdon area to above that proposed. There is no fall back position and in housing numbers terms the Core Strategy is unsound.
Representation ID
598
Person ID  Mrs  Doyle  Agent ID
522161

WCS2 Distribution of Housing Growth 2006-2030
Policy 2

Sound  ☐ Yes  ☐ No  ☐ Justified  ☐ Effective  ☐ Consistent with national policy
Legally Compliant  ☐ Yes  ☐ No

Details of Reasons for Soundness/ Legal Compliance:
Object to the development at Hindslands/Morning Mill and the amount of traffic generated. Over the years, after the construction of the by-pass, the traffic has steadily risen and future development will mean this will increase. The noise pollution will increase, exacerbated by Tennis week and Airbourne. The two primary schools and secondary school in the area are over-subscribed and this will get worse. I understand that there is no provision for new schools in the development. If we allow developments on this scale there will be no open spaces.

Details of Changes to be Made:

Representation ID
579
Person ID  Blen  Agent ID  Mr  Stafford
522174  522173  Preston Bennett Planning

WCS2 Distribution of Housing Growth 2006-2030
Policy 2

Sound  ☑ Yes  ☐ No  ☐ Justified  ☐ Effective  ☐ Consistent with national policy
Legally Compliant  ☑ Yes  ☐ No

Details of Reasons for Soundness/ Legal Compliance:
The recognition of SHLAA sites being an appropriate source of housing provision should be carried through all housing delivery policies.

Details of Changes to be Made:
Details of Reasons for Soundess/ Legal Complaince:

We object to the content of the Policy as drafted on the basis that it has not been shown to be justified, effective or consistent with national policy. The target figure of 9,600 dwellings to be met within the District during the period 2006 to 2030 is significantly lower than the strategic requirement set out in the South East Plan (adopted May 2009) and fails to address identified needs. Separate but related objections have been submitted in response to Policy WCS1 and WCS4, the content of which is relevant to our representations submitted in response to Policy WCS2. We also object to the omission of land at Bird In Eye (North), Framfield Road/ Bird In Eye Hill, as a housing allocation in helping to meet identified housing needs. The site is edged red on the attached site location plan (no. WBP1) and extends to approximately 15ha. The site could accommodate around 300 dwellings and an illustrative masterplan is attached (no. 1583/11H). The site is controlled by Martin Grant Homes Ltd. and Taylor Wimpey UK Ltd and there are no known onsite constraints to bringing the site forward for development in the early part of the plan period. The site should be shown on the inset to the Key Diagram as a housing allocation for around 300 dwellings.

Details of Changes to be Made:

The overall housing requirement to be met in Wealden generally and at Uckfield should be increased in line with our separate but related objections set out in response to Policy WCS1. The Bird In Eye (North), Framfield Road/ Bird In Eye Hill site, should be allocated for development to provide around 300 dwellings (including affordable housing) to help meet identified housing needs in the town. This site provides a wholly deliverable opportunity over the coming five year period for housing development. The BIEN site can come forward in its own right irrespective of town centre improvement schemes.

Details of Reasons for Soundess/ Legal Complaince:

Medical Infrastructure Threatened Para 6.22 refers to the 'limited range of facilities available locally', and states 'a new GP surgery and medical centre has recently been granted planning consent in Willingdon.' This is a change from the original draft wording that the centre would be built and there is now considerable doubt whether it will ever be built at this location. Given that uncertainty the provision of medical infrastructure cannot be sound.

Drainage Issues Para 6.28 states 'development will only be allowed it it can be accomodated by the existing works, unless an alternative location for the treatment and discharge of waste water is implemented.' There appears to be undue reliance on this infrastructure being provided and if it and other infrastructure is not provided the whole allocation at SD4 fails. There appears no fall back position should this be the case and that will make the whole core strategy unsound in terms of numbers of dwellings to be built.

Details of Changes to be Made:
Details of Reasons for Soundess/ Legal Complaince:
The majority of the district is rural area. The Core Strategy recognises that it is important that villages and rural settlements remain vital and that they are sustained throughout the Plan period, so that they can meet their roles as described within the settlement hierarchy of the Plan. The removal of development boundaries from a number of settlements reduces the spread of development within the countryside. Rural Growth Areas shown under Policy WCS6 therefore assume more importance in delivering the Core Strategy. A housing figure of 100 units has been identified for Horam. A number of potentially deliverable sites have been identified in the councils 2010 dated SHLAA for the settlement. The redevelopment of my clients land at Horam to r/o the former Merrydown Cider Factory would tie in with any redevelopment of the factory site. Development here would be upon brownfield land, it could be well integrated with the village and it enjoys good access.

Details of Changes to be Made:
The Horam housing allocation be raised from 100 to 125 units under WCS6.

Details of Reasons for Soundess/ Legal Complaince:
The figure of 564 built or already committed dwellings for Polegate and Willingdon has omitted land allocated for development in the Non Statutory Wealden Local Plan policy PW3 North of Dittons Road which could accommodate some 60 dwellings. In additional all figures should be rounded up to 5 or more.

Details of Changes to be Made:
Change the figure 565 for Polegate and Willingdon built or already committed dwellings to 625 (Re WCS 2)
Representation ID
1155

Person ID  Mar
533827

Agent ID  Mr
533824

WCS2 Distribution of Housing Growth 2006-2030

Policy 2

Details of Reasons for Soundess/ Legal Complaince:
The Hailsham New Allocations column should be increased to 1650 in order to reflect the existing pattern of settlements and the district wide importance of Hailsham as a District Centre (see Table 1) and the reclassification of Stone Cross

Details of Changes to be Made:
This would allow for the inclusion of a new broad area for allocation sites (300 - 350 dwellings) in the south Hailsham area in preference to the Stone Cross allocation which should either be deleted or reduced to 300 dwellings.

Sound  ☐ Yes  ☒ No  ☒ Justified  ☐ Effective  ☐ Consistent with national policy
Legally Compliant  ☒ Yes  ☐ No

Representation ID
1185

Person ID  Miss  Heron
534582

WCS2 Distribution of Housing Growth 2006-2030

Policy 2

Details of Reasons for Soundess/ Legal Complaince:
The allocation of 160 new dwellings at Heathfield for the period 2006 - 2030 is not justified by the evidence base and is far too low for a town of its size and importance. It will not meet housing needs and likely to lead to a decline in services and population and will lead to an increase in un-met housing need in the town. It will also lead to an increasingly ageing population as young people are forced to locate elsewhere to meet their housing need.

Details of Changes to be Made:
Increase the dwelling allocation to Heathfield having regard to its market and affordable housing need. This can be achieved by increasing the overall housing figure at Heathfield rather than taking numbers away from other locations. The main source of funding for delivery of affordable housing will be through cross-subsidy from market housing via s 106 agreements. The current need for affordable housing in Heathfield is identified as 112 households. If this housing need is to be met through the requirement for 35% of dwellings within new housing developments to be affordable then a total allocation of 330 should be required. Sufficient sites are identified to accommodate this allocation but it should be noted that this will only meet current need for affordable and should be regarded as the minimum allocation that is required. This figure could be met through the delivery of all the sites identified in the SHLAA as suitable plus an additional circa 40 dwellings of land at Tilsomore identified on the attached plan to the west of Heathfield. This site was originally considered suitable in the SHLAA for 136 dwellings but re-assessed as unsuitable due to capacity issues on the local highway network. The sustainability appraisal also concludes that this site is well located to the town centre providing good opportunities for good connectivity with relatively minimal landscape impacts. A reduced scheme at this location is therefore suitable in highway and environmental terms and should therefore be considered in order to help meet the 320 requirement.
Details of Reasons for Soundess/ Legal Complaince:
As stated previously, it is asserted that the level of growth identified for Crowborough is insufficient to meet the overarching objectives of the Core Strategy (as set out in Para 4.1) or indeed the objectives of the town council (as set out in the Top of the Weald vision document). Whilst Crowborough does exhibit constraints, it is not accepted that these are insurmountable or indeed any more significant than those which have been demonstrated to exist at other settlements. Indeed, it is suggested that the main constraint - access via Western Road - will be more successfully overcome through a larger scale of development - as the case has been made for the development of 1000 homes at Uckfield

Details of Changes to be Made:
Quantify sufficient growth for Crowborough to support Core Strategy objectives
Details of Reasons for Soundess/ Legal Compliance:

Although the Government has announced its intentions to revoke Regional Spatial Strategies, for the time being these remain part of the Development Plan. Accordingly, in producing the PSCS DPD the Council is required to have regard to, and be compliant with the South East Plan published in May 2009. The housing requirements set out in Policy H1 of the SEP has been the subject of detailed examination having regard to future housing demand in the south east region up to 2026. This identified the requirement for 11,000 new dwellings to be provided in Wealden District over the period 2006 - 2026, the equivalent of 550 dwellings per annum over a 20 year period. Without providing any sound justification, the Council has not only provided for an extended plan period which fails to comply with that of the SET, but also puts forward a substantially reduced housing requirement of 9,600 dwellings over the period 2006 - 2030 (the equivalent of 400 dwellings per annum during the 24 year period). If the SEP housing requirement were to be extended by 4 years based on its annual requirement of 550 dwellings, this would require 13,200 dwellings over an equivalent 24 year period. Thus, draft policies WCS1 and WCS2 of the PSCS DPD represent a shortfall of some 3,600 dwellings compared to the SEP housing requirement (as adjusted to cover the extended PSCS DPD plan period). While it is acknowledge that Wealden District is essentially rural in character and that it has a number of environmental constraints, these are not substantially greater than the majority of other Districts and Boroughs within the south east region. Very special justification would need to be provided for such a substantial departure from the SEP housing requirement figures given that there is a legal requirement for the two documents to be in general compliance with each other.

Details of Changes to be Made:

In order to be in compliance with the SEP in this respect, some 13,200 additional dwellings would need to be provided within the District between 2006 and 2030 with a remaining requirement for 8,311 dwellings between 2010 and 2030. Draft Policy WCS1 would need to be revised accordingly. This would however, have major ramifications for the PSCS Spatial Strategy in terms of the distribution of housing growth as currently set out in draft Policy WCS2. Indeed, it is difficult to see how the PSCS DPD could be reasonably altered in view of the fundamental nature of these representations and the only potential way forward in these circumstances would be for the Council to withdraw the document or provide detailed evidence and justification for such a substantial departure from current development plan policy, which might then provide an opportunity for such justification to be properly scrutinised as part of the LDF Examination in Public procedure.
Summary of all Representations - Proposed Submission Core Strategy Regulation 27 - Report 11th July 2011

Representation ID
1222

Person ID M J
522256 M J Gleeson Group PLC

Agent ID Mr Pickup
522254 Town & Country Planning Solutions

Legally Compliant □ Yes □ No

Sound □ Yes □ No □ Justified □ Effective □ Consistent with national policy

Details of Reasons for Soundness/ Legal Complaince:

3.2 Crowborough is identified by the Council as a "top tier" District Centre within Wealden District which in strategic and locational terms is relatively close to two of the Council's three highest order "Primary Centres" at Tunbridge Wells and Tonbridge to the north of the District. The Council suggests however, that the potential for future housing land release at Crowborough is limited, due mainly to landscape constraints. 3.3 No satisfactory evidence has been produced by the Council to show that Crowborough is any more constrained than development at other locations more favoured by the Council for strategic housing development, such as at Uckfield (within its historic flood risk problems and traffic congestion in its town centre) or within the Hailsham/Polegate/Stone Cross area (where there are waste water treatment constraints that could affect the high protected Pevensey Levels area within the southern part of the district). As it stands at present and for no sound reason, new housing provision would be heavily biased towards meeting housing requirements in the central and southern parts of the District rather than in the northern part, where demand is high as reflected by local house prices. 3.4 There is no sound evidence that the Crowborough area can only accommodate up to 300 new dwellings nor is any sound reason given for delaying such housing development until the middle and end part of the PSCS DPD period. In particular, this has major implications for the delivery of affordable housing, for which there is a recognised need in Crowborough. This would be limited to just 105 additional affordable dwellings between 2015 - 2030 (assuming 35% delivery within the strategic development areas identified by the Council). 3.5 He Council has provided no satisfactory explanation as to what is meant by a "Strategic Development Area" (either in relation to the settlement hierarchy or in terms of the size of potential housing sites or the number of houses). Furthermore, not only is the purposes of identifying such areas unclear, but also there are clear inconsistencies in the Council's overall identification of potential strategic development areas compared to other areas within the District (e.g. Horam) where a significant number of dwellings might be also delivered, but without SDA status. 3.6 The identification of 12 SDAs in draft Policy WCS4 also prejudices any proper or detailed examination and assessment of other potentially suitable housing land at Crowborough (and elsewhere) at the SS and DSA DPD stage. These representations have in particular, demonstrated that any credible or sound evidence, nor do they necessarily represent the best locations or land available for future housing development (contrary to national planning policy contained in PPS12, paragraph 4.38). The Council's contingency site, which although shown in figure 9 and on the key Diagram of the PSCS DPD is not referred to in any draft Core Strategy policy. In addition it is allocated for another purpose within the Non-Statutory Local Plan and is wholly within the HWAONB. 3.7 The identification of SDAs in draft Policy WCS4 means that to be properly tested at the EIP, there would need to be a much wider consideration of all suitable candidate sites such as the land at Alderbrook, which is allocated for housing development in the Non-Statutory Local Plan (Policy CR4) and is within the Crowborough development boundary. This is immediately available to provide approximately 80 dwellings (24 affordable) and would not have to be delayed until either the middle or the end of the plan period unlike SD8, SD9 or SD10. 3.8 It must be highly questionable whether it would be appropriate to examine and compare the SDA sites with other candidate sites at the PSCS DPD EIP. It is also highly questionable as to whether the Council's proposed SS DPD would serve any purpose other than to merely identify site boundaries or provide 'development briefs' for the 12 DSA sites listed in draft Policy WSC4. If so, it is questionable as to the purpose of the Council's proposed SS DPD as the site boundaries could be identified in the Council's proposed DSA DPD and development briefs could be provided in the form of Supplementary Planning Documents. 3.9 The Council's proposed Spatial Strategy Policy is a fundamental part of the PSCS DPD and if this is found to be fundamentally flawed for the cumulative reasons put forward in these representations, then the document would be intrinsically unsound. Rather than identifying suitable settlements and broad numbers for new housing delivery in each based upon the Council's proposed settlement hierarchy, the Council has largely ignored this and has instead identified SDAs at specific locations, thereby significantly restricting the scope of the Council's proposed SS DPD, which would appear to be limited to merely defining site boundaries, rather than providing robust policy based on a full and proper assessment of all suitable and available candidate sites. Eight Appendices have been submitted, but are not attached, and these are available to view at the Council Offices by request.
Details of Changes to be Made:

3.10 Indeed, the PSCS DPD is so defective that it is difficult to see how it could be reasonably altered in view of the fundamental nature of these representations and the only potential way forward in this situation would be for the Council to withdraw the document in order to either provide a detailed evidence base for each of its proposed SDAs or alternatively and more appropriately, for this to form part of a later SS DPD (if still relevant) or a DSA DPD, once the core strategy has been adopted. This would then provide a proper opportunity to assess in detail all the housing sites proposed by the Council together with other candidate sites having regard to the overall housing requirement and the hierarchy of settlements as set out in the Core Strategy DPD.
INFRASTRUCTURE The local roads and traffic infrastructure is already running to its maximum capacity at present. During peak commuting hours, traffic is often congested along the A2270 Eastbourne Road, from as far as Willingdon roundabout to Cophall roundabout, Polegate High Street and C40 Wannock Road and Hailsham Road. Any increase in the number of vehicle movements from the proposed Morning Mills Farm needs to address this issue with a workable plan. As yet, Wealden District Council has not been able to confirm how the highways issue will be addressed and how the traffic will work to accommodate the current high volume of traffic movements and with the extra proposed 700 new allocations (dwellings) and 8600 square metres of employment floor space on land at Hindsland / Morning Mill Farm would create. The South Wealden and Eastbourne Transport Study (SWETS) report had used difference format on the same Trip Rates & Trip Generations, it makes it very hard for the general public to understand exactly what the Trip Rates & Trip Generations are. However, Wealden District Council in the Honey Farm Appeal submissions, indicated that the traffic and road INFRASTRUCTURE can not accommodate the estimated traffic generated from the 520 houses, as there is only about 50 meters from Cophall roundabout. I would question how 50% more houses and 8600 square metres of employment floor space would be able to cope in the same road. Using the formula, the Trip Generation would be 450 both ways which equates to approximately 38 vehicle movements every 5 minutes. This Council has not been able to answer my question fully and has simply said that would be the Highways Authority’s responsibility. I refer to pages 69 and 70 of the East Sussex County Council Highways’ Report dated 10 September 2010 for information of their findings, which is relevant to my submissions above. COPHall Roundabout Sensitivity Test 3.1 Using the Dittons Road trip rates, the development traffic from 520 dwellings on the PW1 site has been calculated as follows: Table 3.1: 520 Dwellings Trip Rates & Trip Generations Time Period Trip Rates Trip Generations AM Peak Arrive Depart Two way (0800 - 0900) 0.12 0.46 0.58 62 239 301 The data shows an increase of about 301 trips per hour, 5.016 cars per minute, will affect other junctions seriously and create a bottleneck at A22/A27 and the Polegate cross roads, currently at peak times, there are long queues from Cophall roundabout back to Lower Willingdon and C40 Wannock Road. Within the honey Farm appeal, this Council argues that it would be difficult for vehicle users to enter the Cophall roundabout and make their journeys to the A27 to get to Lewes or Hailsham and other areas. The Council also contends that the infrastructure would not be able to cope with the number of dwellings at the site, despite this argument raised by the Council, those same arguments also apply to the Mornings Mill Farm site, which this Council has failed to consider. INFRASTRUCTURE- SCHOOL AND HEALTH FACILITIES As it stands, the local Schools and health facilities are only just able to cope with the high level of service users in the Eastbourne area. An estimated increase in the local population by at least 2,000 – 3,200 people will see a severe strain on the local resources available within the infrastructure. Willingdon Community School is already oversubscribed and as an example, mobile classrooms were introduced some years ago to accommodate the increase in students. To propose a further extension at Willingdon Community School to take on more students will see a further strain on the infrastructure, the impact of the surrounded roads and parking will be severely impacted. The need of a new community school and primary school has not been fully considered and no site has been identified within the plans. The proposed new medical center at the former Towermill Place remains very uncertain, this council had amended the wording at the end, it is misleading that the new medical center is part of the Infrastructure when the funding is so uncertain, this was not revealed until I questioned this at a cabinet meeting.

PUBLIC TRANSPORT In the Core Strategy - Proposed Submission Document and at Wealden District Council meetings, the bus corridor has been mentioned many times and our group has submitted that it would simply be unworkable. Currently there is heavy traffic congestion along the A2270 at peak times, with the extra traffic joining A2270 created from the proposed Morning Mills site, it would be impossible for the bus to move from A to B. The Council should be aware that the bus companies contend that there are not enough service users in the area which has resulted in a number of cuts in the bus services within recent years. There is no doubt the choice of public transport is very limited which makes the travel plans unfeasible, despite this, this Council is still adamant that the Morning Mills site is suitable For example, in the Pevensey Road area, North Polegate, there are about 640 dwellings. A few months ago, Stagecoach had considered withdrawing the main bus service for this area. It is very difficult to believe that the proposal of 700 dwellings will actually sustain the service and the bus service will actually remain in place. PROPOSED SUBMISSION CORE STRATEGY OPTION CONSULTATION 2007 Again, in 2007, 749 Polegate and Willingdon residents submitted their consultation slips to Wealden District...
Council and the majority of their views was that Hindslands should not be developed and should remain as a green area and recreational ground. However, Wealden District Council and other groups within the council decided not to accept their consultation slips and their views. At the same time, Wealden District Council received about 1,100 from the whole district. Therefore the 749 submissions from Polegate and Willingdon residents were ignored, as result this seems to have controlled the outcome. Most members of this Council opposed the Honey Farm proposal, their reasons are almost the same as the reasons we have submitted that apply to Hindsland / Mornings Mill Farm. In addition, in the Wealden non-statutory local plan consultation in 2003, we presented a petition signed by 1000 Willingdon household to Wealden District Council. Hindsland / Mornings Mill Farm is not suitable to build extra 1000 new homes. I am pleased to say that the Council and Councillors had made a very sensible decision at the time, 8 years on, there are no changes or improvements within the infrastructure. We are continually facing shortage of secondary school places, primary school places, nursery places and facilities including sports and play facilities, amenity space, parking places an indoor sports hall and swimming pool and yet this Council considers that these will be provided, how? There is no mention of any sustainable or plausible proposal. GREEN SPACE It is important that Hindsland / Mornings Mill Farm continue to remain as a green site between Polegate and Willingdon, according to the local plan. Currently Polegate Town and Willingdon & Jevington Parish Council are short of amenity and recreation space, the shortage is between 30 - 40% below of the national average. In the Proposed Submission Core Strategy Document there is nothing to address this issue. WATER AND SEWAGE On many occasions, our group has submitted that the water supply and sewage is at their full capacity. During meetings at Wealden District Council, we have been told that the sewage has the capacity for the maximum of 1000 new houses. The proposed house numbers are well over the limit of its full capacity. Again these essential facilities continue remain outstanding and the issues ignored

Details of Changes to be Made:
I write to register my objections to the Polegate and Willingdon and Stone Cross area strategy in the Core Strategy on the basis that it is not sound nor justified for the following reasons: INFRASTRUCTURE- SCHOOL AND HEALTH FACILITIES As it stands, the local Schools and health facilities are only just able to cope with the high level of service users in the Eastbourne area. An estimated increase in the local population by at least 2,000 – 3,200 people will see a severe strain on the local resources available within the infrastructure. Willingdon Community School is already oversubscribed and as an example, mobile classrooms were introduced some years ago to accommodate the increase in students. To propose a further extension at Willingdon Community School to take on more students will see a further strain on the infrastructure, the impact of the surrounded roads and parking will be severely impacted. The need of a new community school and primary school has not been fully considered and no site has been identified within the plans. The proposed new medical center at the former Towermill Place remains very uncertain, this council had amended the wording at the end, it is misleading that the new medical center is part of the Infrastructure when the funding is so uncertain. This was not revealed until Cllr Stephen Shing questioned this at a cabinet meeting. PUBLIC TRANSPORT In the Core Strategy - Proposed Submission Document and at Wealden District Council meetings, the bus corridor has been mentioned many times and our group has submitted that it would simply be unworkable. Currently there is heavy traffic congestion along the A2270 at peak times, with the extra traffic joining A2270 created from the proposed Morning Mills site, it would be impossible for the bus to move from A to B. The Council should be aware that the bus companies contend that there are not enough service users in the area which has resulted in a number of cuts in the bus services within recent years. There is no doubt the choice of public transport is very limited which makes the travel plans unfeasible, despite this, this Council is still adamant that the Morning Mills site is suitable For example, in the Pevensey Road area, North Polegate, there are about 640 dwellings. A few months ago, Stagecoach had considered withdrawing the main bus service for this area. It is very difficult to believe that the proposal of 700 dwellings will actually sustain the service and the bus service will actually remain in place. The local roads and traffic infrastructure is already running to it’s maximum capacity at present. During peak commuting hours, traffic is often congested along the A2270 Eastbourne Road, from as far as Willingdon roundabout to Cophall roundabout, Polegate High Street and C40 Wannock Road and Hailsham Road. Any increase in the number of vehicle movements from the proposed Morning Mills Farm needs to address this issue with a workable plan. As yet, Wealden District Council has not been confirm how the highways issue will be addressed and how the traffic will work to accommodate the current high volume of traffic movements and with the extra proposed 700 new allocations (dwellings) and 8600 square metres of employment floor space on land at Hindsland / Morning Mill Farm would create. The report had used difference format on the same Trip Rates & Trip Generations, it make it very hard for the general public to understand exactly what the Trip Rates & Trip Generations are. However, Wealden District Council in the Honey Farm Appeal submissions, indicated that the traffic and road infrastructure can not accommodate the estimated traffic generated from the 520 houses, as there is only about 50 meters from Cophall roundabout. I would question how 50% more houses and 8600 square metres of employment floor space would be able to cope in the same road. Using the formula, the Trip Generation would be 450 both ways which equates to approximately 38 vehicle movements every 5 minutes. This Council has not been able to answer my question fully and has simply said that would be the Highways Authority’s responsibility. The report does not even address how this traffic problem will be address at present or in the future. The increase of about 301 trips per hour, 5.016 cars per minute, will affect other junctions seriously and create a bottleneck at A22/A27 and the Polegate cross roads, currently at peak times, there are long queues from Cophall roundabout back to Lower Willingdon and C40 Wannock Road. Within the honey Farm appeal, this Council argues that it would be difficult for vehicle users to enter the Cophall roundabout and make their journeys to the A27 to get to Lewes or Hailsham and other areas. The Council also contends that the infrastructure would not be able to cope with the number of dwellings at the site, despite this argument raised by the Council, those same arguments also apply to the Mornings Mill Farm site, which this Council has failed to consider. PROPOSED SUBMISSION CORE STRATEGY OPTION CONSULTATION 2007 Again, in 2007, 749 Polegate and Willingdon residents submitted their consultation slips to Wealden District Council and the majority of their views was that Hindslands should not be developed and should remain as a green area and recreational ground. However, Wealden District Council and other groups within the council decided not to accept their consultation slips and their views. At the same time,
Wealden District Council received about 1,100 from the whole district. Therefore the 749 submissions from Polegate and Willingdon residents were ignored, as result this seems to have controlled the outcome. Most members of this Council opposed the Honey Farm proposal, their reasons are almost the same as the reasons we have submitted that apply to Hindslands / Mornings Mill Farm. WATER AND SEWAGE On many occasions, our group has submitted that the water supply and sewage is at their full capacity. During meetings at Wealden District Council, we have been told that the sewage has the capacity for the maximum of 1000 new houses. The proposed house numbers are well over the limit of it’s full capacity. Again these essential facilities continue remain outstanding and the issues ignored GREEN SPACE It is important that Hindsland / Mornings Mill Farm continue to remain as a green lung between Polegate and Willingdon, according to the local plan. Currently Polegate Town and Willingdon & Jevington Parish Council are short of amenity and recreation space, the shortage is between 30 - 40% below of the national average. In the Proposed Submission Core Strategy Document there is nothing to address this issue. I trust that the above representations will be placed on record accordingly.

Details of Changes to be Made:
SUSTAINABLE It is very disappointing that despite repeatedly asked questions at Wealden District Council’s full council meetings and committees regarding the proposed 1265 new houses for this area, Wealden District Council’s position is that it is waiting for the outcome of the Honey Farm Appeal where the proposal is for up to 520 houses. So far, there has never been any mention of any alternative plans should the Council lose the appeal. The Council appears to be confident in defending this appeal, despite also contradicting itself with by using the exact same reasons in the rejection of Honey Farm at Committee to justify and support those proposals within the Core Strategy for the Polegate and Willingdon area, for a site which is only down the road where the same problems would apply. Wealden District Council clearly has no plan B and if Wealden District Council cannot successfully defend this appeal, Willingdon and Polegate will automatic be lumbered with 1785 extra houses. For this reason alone, the Proposed Submission Document is irresponsible and misleading the communities. In addition reason as below; INFRASTRUCTURE- SCHOOL AND HEALTH FACILITIES As it stands, the local Schools and health facilities are only just able to cope with the high level of service users in the Eastbourne area. An estimated increase in the local population by at least 2,000 – 3,200 people will see a severe strain on the local resources available within the infrastructure. Willingdon Community School is already oversubscribed and as an example, mobile classrooms were introduced some years ago to accommodate the increase in students. To propose a further extension at Willingdon Community School to take on more students will see a further strain on the infrastructure, the impact of the surrounded roads and parking will be severely impacted. The need of a new community school and primary school has not been fully considered and no site has been identified within the plans. The proposed new medical center at the former Towermill Place remains very uncertain, this council had amended the wording at the end, it is misleading that the new medical center is part of the Infrastructure when the funding is so uncertain. This was not revealed until Councillor Stephen Shing questioned this at a cabinet meeting.

PUBLIC TRANSPORT In the Core Strategy - Proposed Submission Document and at Wealden District Council meetings, the bus corridor has been mentioned many times and our group has submitted that it would simply be unworkable. Currently there is heavy traffic congestion along the A2270 at peak times, with the extra traffic joining A2270 created from the proposed Morning Mills site, it would be impossible for the bus to move from A to B. The Council should be aware that the bus companies contend that there are not enough service users in the area which has resulted in a number of cuts in the bus services within recent years. There is no doubt the choice of public transport is very limited which makes the travel plans unfeasible, despite this, this Council is still adamant that the Morning Mills site is suitable. For example, in the Pevensey Road area, North Polegate, there are about 640 dwellings. A few months ago, Stagecoach had considered withdrawing the main bus service for this area. It is very difficult to believe that the proposal of 700 dwellings will actually sustain the service and the bus service will actually remain in place. The local roads and traffic infrastructure is already running to it's maximum capacity at present. During peak commuting hours, traffic is often congested along the A2270 Eastbourne Road, from as far as Willingdon roundabout to Cophall roundabout, Polegate High Street and C40 Wannock Road and Hailsham Road. Any increase in the number of vehicle movements from the proposed Morning Mills Farm needs to address this issue with a workable plan. As yet, Wealden District Council has not been confirm how the highways issue will be addressed and how the traffic will work to accommodate the current high volume of traffic movements and with the extra proposed 700 new allocations (dwellings) and 8600 square metres of employment floor space on land at Hindsland / Morning Mill Farm would create. The South Wealden and Eastbourne Transport Study (SWETS) report had used difference format on the same Trip Rates & Trip Generations, it make it very hard for the general public to understand exactly what the Trip Rates & Trip Generations are. However, Wealden District Council in the Honey Farm Appeal submissions, indicated that the traffic and road INFRASTRUCTURE can not accommodate the estimated traffic generated from the 520 houses, as there is only about 50 meters from Cophall roundabout. I would question how 50% more houses and 8600 square metres of employment floor space would able to cope in the same road. Using the formula, the Trip Generation would be 450 both ways, which equates to approximately 38 vehicle movements every 5 minutes. This Council has not been able to answer my question fully and has simply said that would be the Highways Authority’s responsibility. The report does not even address how this traffic problem will be address at present or in the future. The increase of about 301 trips per hour, 5,016 cars per minute, will affect other junctions seriously and create a bottleneck at A22/A27 and the Polegate cross roads,
currently at peak times, there are long queues from Cophall roundabout back to Lower Willingdon and C40 Wannock Road. Within the honey Farm appeal, this Council argues that it would be difficult for vehicle users to enter the Cophall roundabout and make their journeys to the A27 to get to Lewes or Hailsham and other areas. The Council also contends that the infrastructure would not be able to cope with the number of dwellings at the site, despite this argument raised by the Council, those same arguments also apply to the Mornings Mill Farm site, which this Council has failed to consider. PROPOSED SUBMISSION CORE STRATEGY OPTION CONSULTATION 2007 Again, in 2007, 749 Polegate and Willingdon residents submitted their consultation slips to Wealden District Council and the majority of their views was that Hindsland should not be developed and should remain as a green area and recreational ground. However, Wealden District Council and other groups within the council decided not to accept their consultation slips and their views. At the same time, Wealden District Council received about 1,100 from the whole district. Therefore the 749 submissions from Polegate and Willingdon residents were ignored, as result this seems to have controlled the outcome. Most members of this Council opposed the Honey Farm proposal, their reasons are almost the same as the reasons we have submitted that apply to Hindsland / Mornings Mill Farm. WATER AND SEWAGE On many occasions, our group has submitted that the water supply and sewage is at their full capacity. During meetings at Wealden District Council, we have been told that the sewage has the capacity for the maximum of 1000 new houses. The proposed house numbers are well over the limit of its full capacity. Again these essential facilities continue remain outstanding and the issues ignored GREEN SPACE It is important that Hindsland / Mornings Mill Farm continue to remain as a green lung between Polegate and Willingdon, according to the local plan. Currently Polegate Town and Willingdon & Jevington Parish Council are short of amenity and recreation space, the shortage is between 30 - 40% below of the national average. In the Proposed Submission Core Strategy Document there is nothing to address this issue. I trust that the above representations will be placed on record accordingly.

Details of Changes to be Made:

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<tr>
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</tr>
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Details of Reasons for Soundess/ Legal Complaince:

Rydon supports the distribution of an additional 650 new dwellings to Stone Cross. We query the reference to 'Westham' alongside Stone Cross in this table as it is not intended that any of the 650 dwellings are allocated to the village of Westham

Details of Changes to be Made:

Remove reference to the village of 'Westham' in WCS2
I write to register my objections to the Polegate and Willingdon and Stone Cross area strategy in the above document on the basis that it is not sound or justified for the following reasons:

NUMBER OF ALLOCATED HOUSING CONTRADICTS THE AMOUNT WHICH IS CLAIMED TO EVEN BE SUSTAINABLE

It is very disappointing that despite repeatedly asked questions at Wealden District Council’s full council meetings and committees regarding the proposed 1265 new houses for this area, Wealden District Council’s position is that it is waiting for the outcome of the Honey Farm Appeal where the proposal is for up to 520 houses. So far, there has never been any mention of any alternative plans should the Council lose the appeal. The Council appears to be confident in defending this appeal, despite also contradicting itself with by using the exact same reasons in the rejection of Honey Farm at Committee to justify and support those proposals within the Core Strategy for the Polegate and Willingdon area, for a site which is only down the road where the same problems would apply.

Wealden District Council clearly has no plan B and if Wealden District Council cannot successfully defend this appeal, Willingdon and Polegate will automatic be lumbered with 1785 extra houses. For this reason alone, the Proposed Submission Document is irresponsible and misleading the communities. In addition reason as below;

INFRASTRUCTURE - SCHOOL AND HEALTH FACILITIES

As it stands, the local Schools and health facilities are only just able to cope with the high level of service users in the Eastbourne area. An estimated increase in the local population by at least 2,000 – 3,200 people will see a severe strain on the local resources available within the infrastructure. Willingdon Community School is already oversubscribed and as an example, mobile classrooms were introduced some years ago to accommodate the increase in students. To propose a further extension at Willingdon Community School to take on more students will see a further strain on the infrastructure, the impact of the surrounded roads and parking will be severely impacted. The need of a new community school and primary school has not been fully considered and no site has been identified within the plans. The proposed new medical centre at the former Towermill Place remains very uncertain, this council had amended the wording at the end, it is

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Summary of all Representations - Proposed Submission Core Strategy Regulation 27 - Report 11th July 2011

problem will be address at present or in the future. The increase of about 301 trips per hour, 5,016 cars per minute, will affect other junctions seriously and create a bottleneck at A22/A27 and the Polegate cross roads, currently at peak times, there are long queues from Cophall roundabout back to Lower Willingdon and C40 Wannock Road. Within the honey Farm appeal, this Council argues that it would be difficult for vehicle users to enter the Cophall roundabout and make their journeys to the A27 to get to Lewes or Hailsham and other areas. The Council also contends that the infrastructure would not be able to cope with the number of dwellings at the site, despite this argument raised by the Council, those same arguments also apply to the Mornings Mill Farm site, which this Council has failed to consider. PROPOSED SUBMISSION CORE STRATEGY OPTION

CONSULTATION 2007 Again, in 2007, 749 Polegate and Willingdon residents submitted their consultation slips to Wealden District Council and the majority of their views was that Hindsland should not be developed and should remain as a green area and recreational ground. However, Wealden District Council and other groups within the council decided not to accept their consultation slips and their views. At the same time, Wealden District Council received about 1,100 from the whole district. Therefore the 749 submissions from Polegate and Willingdon residents were ignored, as result this seems to have controlled the outcome. Most members of this Council opposed the Honey Farm proposal, their reasons are almost the same as the reasons we have submitted that apply to Hindsland / Mornings Mill Farm. WATER AND SEWAGE On many occasions, our group has submitted that the water supply and sewage is at their full capacity. During meetings at Wealden District Council, we have been told that the sewage has the capacity for the maximum of 1000 new houses. The proposed house numbers are well over the limit of its full capacity. Again these essential facilities continue remain outstanding and the issues ignored.

GREEN SPACE It is important that Hindsland / Mornings Mill Farm continue to remain as a green lung between Polegate and Willingdon, according to the local plan. Currently Polegate Town and Willingdon & Jevington Parish Council are short of amenity and recreation space, the shortage is between 30 - 40% below of the national average. In the Proposed Submission Core Strategy Document there is nothing to address this issue. I trust that the above representations will be placed on record accordingly.

Details of Changes to be Made:
1.1 The Amount of New Housing – Policy WCS1 and WCS2 and paragraphs 5.3 etc 1.1.1 We note that the proposed Submission Core Strategy looks to accommodate 9574 new dwellings in the district across the plan period (2006 – 2030) i.e. 399 a year. This is circa 27.5% less than the 11,000 dwellings proposed across the district in the South East Plan (SEP) (May 2009) for the period 2006 and 2026. 1.1.2 PPS12 requires Core Strategies to conform generally to the regional policy. We do not consider the amount of new housing proposed in the district to be legally compliant as it is not consistent with regional policy as set out in the SEP. 1.1.3 Whilst the LPA appear to be progressing with a lower level of growth on the assumption that the SEP will be revoked by the time the Core Strategy gets to examination, the fact is the SEP remains part of the development plan at present and the CS should have regard to the aims and objectives of the SEP/ justify why it is necessary and appropriate to depart from it. The proposed Submission Core Strategy contains no such justification. 1.1.4 A detailed understanding of the background to the amount of new housing proposed in the district in the SEP is in our opinion important in considering the soundness of the housing land supply strategy now being advocated in the proposed Submission Core Strategy document. 1.1.15 The Chief Planning Officer (CPO) in his letter of the 6th July made it clear that in the context of the revocation of the RSS LPAs would be responsible for determining the housing numbers in the absence of a regional target, and that the housing numbers promoted by LPAs would need to be justified, as LPAs would need to defend them through the LDF examination process. 1.1.19 The District Council has an obligation to assess and provide for the housing needs and demands of the District. Paragraph 33 of PPS3 makes it very clear that in determining local levels of housing provision local planning authorities should, in preparing their Core Strategies take into account evidence of current and future levels of housing need and demand, e.g. as set out in Housing Market Assessment and the Housing Needs Assessment. 1.1.22 Having regard to the above we feel the DC should give consideration to the accommodation of at least 13,200 (i.e. the 11,000 set out in the SEP plus 4 x 550) to cover the additional years to 2030). Given the 4,889 units are already committed this would leave a residual requirement of 8,311 i.e. a residual requirement equivalent to 415 dwellings pa. If, 75% of the 13,200 units were on sites that generated an affordable housing need under the new policy WCS8, this level of provision could provide for circa 3,465 affordable dwellings i.e. 18% of the affordable need identified in the HNA. Which demonstrates how severe the need is relative to the supply 1.1.23 WDC’s aversion to higher housing numbers appears to be related to the effect these could have on infrastructure and services, especially in the southern part of the district. However, it is often the case that the strategic housing allocations help to address this issue, providing new transport links/highway improvements, contributing to new sustainable drainage facilities, new schools, medical facilities etc. Higher levels of growth need not prejudice existing infrastructure and services; they could in fact help address existing problems. 1.2 Housing Distribution 1.2.1 We do not consider the housing distribution strategy to be legally compliant. It is not consistent with regional policy as set out in the SEP. PPS12 requires Core Strategies to conform generally to the regional policy. Paragraph 4.33 states that choices to be made on where growth should take place should follow national and regional policy. 1.2.2 The southern part of Wealden district is located within the Sussex Coast Sub Region, one of the nine sub regions identified in the SEP. These sub regions were to be ‘the focus for growth and regeneration’. Policy SP1 of the SEP refers 1.2.3 Policy H1 of the SEP deals with regional housing provision. It stipulates that in the Sussex Coast Sub Region, 69,300 net additional dwellings should be provided between 2006 and 2026. 1.2.4 Policy SCT5 of the SEP sets out the scale and distribution of housing across the Sussex Coast sub region. It indicates that that part of Wealden District which falls within the Sussex Coast Sub Region should seek to accommodate 7000 dwellings during the plan period (2006 – 2026) i.e. 350 dwellings per annum. 1.2.5 Given the above, and having regard to the requirements of policy H1b of the SEP (wherein WDC are required to provide some 11,000 units across the district during the plan period (2006-2026)), it is clear that the SEP looks to focus growth within that part of the district that falls within the Sussex Coast Sub Region, with only a small proportion of development (4000 homes) to be accommodated within what was called the Rest of the District. 1.2.6 The SEP also makes it clear that the Sussex Coast Sub Region was identified as an area where the government was looking to proactively pursue and promote economic growth and regeneration. As a result, over 60% of WDC’s housing requirement was located within the Sussex Coast Sub Region. The spatial strategy being promoted in the proposed Submission Core Strategy document, according to paragraph 5.5.of the proposed Submission Core 493/A3/JA April 2011 Strategy document, predicated upon the strategy objectives and the settlement hierarchy. Thus only circa 51% of the
proposed level of housing growth is to be located within what was referred to as the Sussex Coast Sub Region in the SEP. 1.2.7 Not only is the spatial strategy inconsistent with the SEP, but it fails to take on board the reason for the spatial strategy proposed in the SEP i.e. the economic regeneration of the Sussex coastal area. WDC have, in their sustainability appraisal of the proposed Submission Core Strategy Document failed to assess the implications of the spatial strategy advocated in the proposed Submission Core Strategy Document on the economic regeneration of the Sussex coastal area. The council’s failure to undertake this work means that the proposed Submission Core Strategy Document is not soundly based. 1.2.9 In promoting an annual housing requirement of just 400 units WDC, in their proposed Submission Core Strategy document, are in our opinion actively stifling economic growth. Furthermore, the council’s decision to treat the whole district as a single entity, with no emphasis placed on the regeneration of the Sussex Coast Sub Region, is in our opinion, despite the aspirations of policies SP03, 04 and 06, actively prejudicing the economic regeneration of the coastal area, to the detriment of the wider area. 1.2.11 As currently drafted the housing distribution strategy advocated by WDC in their Proposed Submission Core Strategy is not in ‘general conformity’ with the RSS as required by Paragraph 4.2 and 4.33 of PPS12 and is not therefore sound.

Details of Changes to be Made:

3.1 The Amount of New Housing:- 3.1.1 We feel the housing targets set out in policy WCS1 should having regard to our position on the scale of housing growth be amended from 9600 to 13,200 dwellings. 3.1.2 Similarly we feel the housing targets set out in policy WCS2 of the CS should, having regard to our position on the scale of housing growth, the spatial strategy, and the level of housing proposed in Stone Cross specifically, be amended thus:- WCS2 Distribution of Housing Growth 2006 – 2030 Town/ settlement Stone Cross and Westham 42 Built or already committed - 980 New allocations; total dwellings 2006 - 2030 1,022. Total Wealden 4,889 Built or already committed; 8,311 new allocations; 13,200 Total Dwellings 2006 - 2030. 3.1.3 We would also suggest that the number of new allocations is revised to ensure that 60% of the proposed growth is located in the Sussex Coast Sub Region, as per the SEP, which should be identified on a plan. 3.1.4 Having regard to the above there would also be a need to amend policy SPO3 to address the increase in housing supply we advocate, and the reinstatement of the Sussex Coast Sub Region. Similarly paragraphs 3.11 and 3.16 would need to be revised to reflect our position, with the economic policies (SPO6 and WSC3 reviewed accordingly). 3.1.5 If the scale of housing proposed during the plan period is not revised as recommended, we would suggest that policy WCS2 is revised thus:- WCS2 Distribution of Housing Growth 2006 – 2030 Town/ settlement Stone Cross and Westham 42 Built or already committed - 850 New allocations; total dwellings 2006 - 2030 892. Total Wealden 4,889 Built or already committed; 4,835 new allocations; 9,724 Total Dwellings 2006 - 2030. 3.1.6 Given our recommended changes to the scale of growth proposed at Stone Cross and Westham we would also recommend that paragraph 6.31 (3) and paragraph 6.31 (3 bullet points 3, and 4 be amended thus:- ‘allocating a range of deliverable housing sites for up to 700 dwellings, and leisure, recreation and community facilities in Polegate and Willingdon, around 850 dwellings in Stone Cross, with some 16,890 sq. metres employment floorspace in the Polegate and Willingdon area. Sites for development will be identified and phased through the Site Allocation DPDs including: · provision of around 550 homes within an extension to the urban area of Stone Cross to the east and south east (SD6), with flexibility between SD6 and SD7, subject to highway improvements; · provision of around 300 homes within an extension to the urban area of Stone Cross to the north (SD7), with flexibility between SD6 and SD7, subject to highway improvements’
Details of Reasons for Soundness/ Legal Complaince:

1. The majority of new housing is proposed to be provided in the southern part of the district. The highest number of additional dwellings (1300) is proposed for Hailsham, which is in addition to the 1645 dwellings already built or committed. Thus Hailsham is intended to receive 2945 dwellings over the 24 years of the plan period. This represents 123 dwellings per year. 2. What these figures fail to take into account is the ability of the local housing market in any given part of the District to generate sales of new dwellings at prices that will enable developers to implement viable developments. There is a limit to the number of dwellings that can be sold in Hailsham in any given year, which reflects the strength and vitality of the local housing market. Developers will not build more houses than they are reasonably sure they can sell at a price that reflects an appropriate profit level. The Wealden Housing Market Assessment published in 2007 sets out the "Drivers in the Development Industry" (paragraph 1.69) as follows: a. The type and size of dwelling they (a developer) have succeeded in selling in either the local area or in other similar locations (and therefore for which there is a known market). b. The scale of demand or pressure on particular dwellings in the existing stock - through discussion with local agents. c. Related to the above, the return on capital invested i.e. the mix of dwellings that will provide a quick sale once completed. d. The value of the land once contributions for affordable housing and other obligations have been factored in. 3. It is considered that these factors have not been properly taken into account. The market in Hailsham is not strong enough to ensure that at least 123 dwellings per year over a 24-year period can be delivered. Just because the settlement has been identified as being suitable for this much housing, and is even in need of it, does not mean that it will be provided. The delivery of the housing is wholly dependent on the development industry being able to sell it and it is not considered that any evidence from house builders or agents has been obtained to support the Council's view that this amount of housing can be delivered in Hailsham in the plan period. 4. It is also considered that the same issues apply to the proposed allocations in Polegate/Willingdon and Stone Cross/Westham. These are all close together in a relatively small part of the South of the District, and together they account for 4,902 of the dwellings proposed in the Strategy (51%). The Council's strategy for this part of the district will also result in the loss of the individual identity of these Wealden settlements as they will effectively become an urban extension of north Eastbourne. 5. The part of the District where the market is known to be strongest is in the north, a fact that is recognised at paragraph 2.17 of the Core Strategy which states: "Wealden's good quality of life and its proximity to London and the Gatwick growth area, creates a high demand for housing, especially in the north of the District. Demand has in the past exerted considerable upward pressure on house prices, and has caused a widening gap between local incomes and market prices, and led to severe shortages of affordable housing". This is the area where the Council can be far more confident that the amount of new housing needed can be delivered. The total number of proposed units in Crowborough, edge of Tunbridge Wells and Heathfield is only 1,557, which is only 16% of the total. Even if half of the number to be provided in the rural villages is added, this only brings the number to 2,243 (23%). Uckfield is not in the northern part of the District where the market is strongest. 6. The Proposed Submission Core Strategy is unsound because the majority of housing has been allocated to settlements in the south of the District where the market is not strong enough to deliver them, and not enough housing has been directed to the northern part of the district where they can be delivered. Notwithstanding the constraints of the AONB and the Ashdown Forest Special Protection area there is scope to prove more land for housing at Crowborough, and in the interests of actually seeking to achieve more housing in the District these should be actively pursued in the Core Strategy. One of the particular recommendations of the Wealden Housing Market Assessment is the encouragement of more small dwellings in the northern part of the district (para 9) in this could be an integral part of achieving more dwellings in the part of the District where there is a more viable housing market.

Details of Changes to be Made:
More housing should be provided at Heathfield and Crowborough. A minimum of 500 dwellings should be provided in Heathfield and a minimum of 900 in Crowborough (both excluding commitments etc)
We are intrigued by the Council’s intended adoption of an unsound housing position. The Council’s proposals for the provision of housing development during the period 2006 – 2030 demonstrate that the Council’s Local Development Framework Document is not in conformity with the Regional Spatial Strategy, which forms part of the Development Plan. Paragraph 3.3 of the Council’s Background Paper no. 1 (BP1) states “Current legislation requires that the Core Strategy is in general conformity with the Regional Spatial Strategy, the South East Plan” (SEP), which was adopted in May 2009. In paragraph 3.3 of BP1, the Council also acknowledge that “The South East Plan requires that at least 11,000 dwellings is provided in Wealden District between 2006 and 2026”. The SEP (Policy H1) requires 11,000 new dwellings to be provided in Wealden District between 2006 and 2026, equal to an overall annual requirement of 550 per year. Paragraph 3.3 of the Council’s BP1 states “Because of existing planning permissions and houses that have already been built since 2006, overall we need to find locations for a total of approximately 7,000 new houses between now and 2026”. Assuming 550 dwellings per year based on the SEP housing requirement, extending the PSCS DPD end date to 2030 (i.e. 4 more years) would require an additional 2,200 dwellings, bringing this total to the equivalent of 9,200 dwellings between 2006 and 2030. Policy WCS2 indicates that 4,889 dwellings are already committed (through planning permissions, commencements etc.) as at 1st April 2010. Set against the SEP requirement, this would leave a residual requirement for 6,111 dwellings up to 2026 (i.e. 11,000 minus 4,889) and if the SEP requirement were to be extended by 4 years up to 2030 (at 550 dwellings per year i.e. a total of 2,200 dwellings), this would create a total residual requirement of 8,311 additional dwellings by 2030. This residual requirement is the equivalent of 415 dwellings per annum during the remaining 20 year period between April 2010 and April 2030. By contrast, draft Policy WCS1 provides for a total provision of 9,600 dwellings between 2006 and 2030. Taking account of 4,889 dwelling commitments, this leaves only 4,685 new dwellings during the remaining 20 year period. This is the equivalent of only 230 dwellings per year (i.e. just over half that implied by extending the annual housing requirement set out in Policy H1 of the SEP to 2030). In draft Policy WCS2, the 9,600 dwelling figure referred to in draft Policy WCS1 has a total of 9,574 dwellings during the same 2006 – 2030 time period. The Council has not provided any justification for failing to comply with the housing requirements set out in SEP and no justification has been provided as to how the seemingly speculative figure of 9,600 dwellings or 9,574 dwellings has been arrived at for the housing requirement during the period 2006 – 2030 in draft Policies WSC1 and WSC2. As the council are aware there have been a number of recent announcements regarding the emerging Localism Bill and the changes being sought by the Government and we have looked to deal with these within our comments. As the Council is aware, Section 19 of the Planning and Compulsory Purchase Act 2004 (as amended) deals with the Preparation of local development documents. Section 19(2) specifically states that: “In preparing a Development Plan Document or any other local development document the local planning authority must have regard to (a) national policies and advice contained in guidance issued by the Secretary of State; (b) the RSS for the region in which the area of the authority is situated, if the area is outside Greater London”; (h) any other local development document which has been adopted by the authority”. The adopted South East Plan therefore remains part of the development plan and whatever the Council believes cannot be used as a reason for not complying with 19(2)(b) as this is a statutory requirement. This is particularly true bearing in mind recent appeal decisions, which confirm the status of the RSS’s and the limited weight that can be attributed at this time to the emerging Localism Bill. Accordingly any DPD that appears prior to enactment of the Localism Bill which materially departs from the RSS must be found unsound given that it would not comply with statute, particularly given the Governments recent announcement that an Environmental Assessment will now be carried out to consider the removal of the RSS’s. By any reasonable standard, this is likely to take a long period of time and it is therefore fair to assume the RSS’s will remain as part of the development plan for a good period to come. Nonetheless, even ignoring the above the Government remains committed to the delivery of more housing and it therefore seems perverse for the council to be attempting to adopt a strategy which seeks to reduce what should be recognised at the very least, as a minimum housing requirement. It is clear from all the above therefore that the RSS remains in law as part of the development plan and cannot be ignored, as the council appears to be seeking to do. We also refer the council back to the founding principles of the emerging local development framework. For example PPS 12 confirms that the Core Strategies; “4.36 Core strategies must be justifiable: they must be: • founded on a robust and credible evidence base; and • the most appropriate strategy when considered against the reasonable alternatives”. We
question whether the council’s unjustified Housing Growth figures meet this simple test as presently emerging and we maintain therefore that the Council’s emerging Core Strategy is not only deficient because it ignores the adopted RSS, but it also not founded on the most up to date evidence base. Perhaps, however most importantly we draw the council’s attention to the evidence base it has at its disposal and indeed comments it makes in supporting documents for this Core Strategy. Paragraph 5.3 of the “Managing the Delivery of Housing Background Paper” – Background Paper 2 notes that “the Council’s Housing Needs Assessment highlights the acute level of affordable housing need within the District and it is noted that the main means of achieving affordable housing delivery is by the means of the construction of market housing...” Paragraph 6.11 of the same document goes onto confirm that “on this basis, the assessment has identified an annual affordable housing need of 812 in Wealden”. On the basis that the delivery of affordable housing, as accepted by the Council is predicated on the delivery of market accommodation, the evidence supports a much higher level of growth than that envisaged by paragraphs 3.8 – 3.17 and more importantly policies WCS1 and WCS2 of the consultation document. Indeed, it is obvious from the above that a target of 4,685 new homes over the period 2006 – 2026 is neither robust or indeed accurate and would continue to exacerbate the ongoing chronic housing deficiencies in the district. Furthermore, paragraph 3.22 of BP1 is of course, wholly misleading as it compares housing target figures that relate to two different time periods. The 11,000 dwellings target relates to the housing requirement set out in SEP between the period 2006 and 2026 (i.e. equal to 550 dwellings per annum), whereas the Council’s reduced figure of 9,600 dwellings relates to an extended 4 year period between 2006 – 2030 which would be the equivalent of 400 dwellings per annum (i.e. a reduction of 150 dwellings per annum over the entire Plan period compared to the SEP). Thus, not only is the PSCS DPD not legally compliant in failing to be in accordance with the Development Plan (or its time period), but also it is not sound, as no satisfactory justification has been provided for the substantial reduction in the housing period and over an extended plan period. Moreover, no justification has been made as to why the council fails to take on board the evidence which clearly supports a higher housing provision than that proposed within the adopted RSS, particularly taking on board the Governments growth agenda.

Details of Changes to be Made:
We therefore suggest that the submitted Core strategy needs to be amended to take into the account the extant development plan, including the South East Plan’s housing target at the very least, but with a recognition for a higher level of growth should be planned for. At the very least therefore, there needs to be a larger degree of flexibility built into the document. Whilst the Council has within paragraphs 5.18 – 5.20, as well as policy WCS5 sought to provide a contingency within the document, this does not go far enough and needs to be far more robust to take account, as indentified above of the chronic affordable housing issues that exist within the District.

Details of Reasons for Soundess/ Legal Compliance:
Housing: we support the reference to appropriate, sustainable growth within villages, including affordable housing

Details of Changes to be Made:
We are intrigued by the Council's intended adoption of an unsound housing position. The Council's proposals for the provision of housing development during the period 2006 – 2030 demonstrate that the Council's Local Development Framework Document is not in conformity with the Regional Spatial Strategy, which forms part of the Development Plan. Paragraph 3.3 of the Council's Background Paper no. 1 (BP1) states "Current legislation requires that the Core Strategy is in general conformity with the Regional Spatial Strategy, the South East Plan" (SEP), which was adopted in May 2009. In paragraph 3.3 of BP1, the Council also acknowledge that "The South East Plan requires that at least 11,000 dwellings is provided in Wealden District between 2006 and 2026". The SEP (Policy H1) requires 11,000 new dwellings to be provided in Wealden District between 2006 and 2026, equal to an overall annual requirement of 550 per year. Paragraph 3.3 of the Council's BP1 states "Because of existing planning permissions and houses that have already been built since 2006, overall we need to find locations for a total of approximately 7,000 new houses between now and 2026". Assuming 550 dwellings per year based on the SEP housing requirement, extending the PSCS DPD end date to 2030 (i.e. 4 more years) would require an additional 2,200 dwellings, bringing this total to the equivalent of 9,200 dwellings between 2006 and 2030. Policy WCS2 indicates that 4,889 dwellings are already committed (through planning permissions, commencements etc.) as at 1st April 2010. Set against the SEP requirement, this would leave a residual requirement for 6,111 dwellings up to 2026 (i.e. 11,000 minus 4,889) and if the SEP requirement were to be extended by 4 years up to 2030 (at 550 dwellings per year i.e. a total of 2,200 dwellings), this would create a total residual requirement of 8,311 additional dwellings by 2030. This residual requirement is the equivalent of 415 dwellings per annum during the remaining 20 year period between April 2010 and April 2030. By contrast, draft Policy WCS1 provides for a total provision of 9,600 dwellings between 2006 and 2030. Taking account of 4,889 dwelling commitments, this leaves only 4,685 new dwellings during the remaining 20 year period. This is the equivalent of only 230 dwellings per year (i.e. just over half that implied by extending the annual housing requirement set out in Policy H1 of the SEP to 2030). In draft Policy WCS2, the 9,600 dwelling figure referred to in draft Policy WCS1 has a total of 9,574 dwellings during the same 2006 – 2030 time period. The Council has not provided any justification for failing to comply with the housing requirements set out in SEP and no justification has been provided as to how the seemingly speculative figure of 9,600 dwellings or 9,574 dwellings has been arrived at for the housing requirement during the period 2006 – 2030 in draft Policies WSC1 and WSC2. As the council are aware there have been a number of recent announcements regarding the emerging Localism Bill and the changes being sought by the Government and we have looked to deal with these within our comments. As the Council is aware, Section 19 of the Planning and Compulsory Purchase Act 2004 (as amended) deals with the Preparation of local development documents. Section 19(2) specifically states that: "In preparing a Development Plan Document or any other local development document the local planning authority must have regard to (a) national policies and advice contained in guidance issued by the Secretary of State; (b) the RSS for the region in which the area of the authority is situated, if the area is outside Greater London"; (h) any other local development document which has been adopted by the authority". The adopted South East Plan therefore remains part of the development plan and whatever the Council believes cannot be used as a reason for not complying with 19(2)(b) as this is a statutory requirement. This is particularly true bearing in mind recent appeal decisions, which confirm the status of the RSS’s and the limited weight that can be attributed at this time to the emerging Localism Bill. Accordingly any DPD that appears prior to enactment of the Localism Bill which materially departs from the RSS must be found unsound given that it would not comply with statute, particularly given the Governments recent announcement that an Environmental Assessment will now be carried out to consider the removal of the RSS’s. By any reasonable standard, this is likely to take a long period of time and it is therefore fair to assume the RSS’s will remain as part of the development plan for a good period to come. Nonetheless, even ignoring the above the Government remains committed to the delivery of more housing and it therefore seems perverse for the council to be attempting to adopt a strategy which seeks to reduce what should be recognised at the very least, as a minimum housing requirement. It is clear from all the above therefore that the RSS remains in law as part of the development plan and cannot be ignored, as the council appears to be seeking to do. We also refer the council back to the founding principles of the emerging local development framework. For example PPS 12 confirms that the Core Strategies; “4.36 Core strategies must be justifiable: they must be: • founded on a robust and credible evidence base; and • the most appropriate strategy when considered against the reasonable alternatives”. We
question whether the council’s unjustified Housing Growth figures meet this simple test as presently emerging and we maintain therefore that the Council’s emerging Core Strategy is not only deficient because it ignores the adopted RSS, but it also not founded on the most up to date evidence base. Perhaps, however most importantly we draw the council’s attention to the evidence base it has at its disposal and indeed comments it makes in supporting documents for this Core Strategy. Paragraph 5.3 of the “Managing the Delivery of Housing Background Paper”—Background Paper 2 notes that “the Council’s Housing Needs Assessment highlights the acute level of affordable housing need within the District and it is noted that the main means of achieving affordable housing delivery is by the means of the construction of market housing…” Paragraph 6.11 of the same document goes onto confirm that “on this basis, the assessment has identified an annual affordable housing need of 812 in Wealden”. On the basis that the delivery of affordable housing, as accepted by the Council is predicated on the delivery of market accommodation, the evidence supports a much higher level of growth than that envisaged by paragraphs 3.8 – 3.17 and more importantly policies WCS1 and WCS2 of the consultation document. Indeed, it is obvious from the above that a target of 4,685 new homes over the period 2006 – 2026 is neither robust or indeed accurate and would continue to exacerbate the ongoing chronic housing deficiencies in the district. Furthermore, paragraph 3.22 of BP1 is of course, wholly misleading as it compares housing target figures that relate to two different time periods. The 11,000 dwellings target relates to the housing requirement set out in SEP between the period 2006 and 2026 (i.e. equal to 550 dwellings per annum), whereas the Council’s reduced figure of 9,600 dwellings relates to an extended 4 year period between 2006 – 2030 which would be the equivalent of 400 dwellings per annum (i.e. a reduction of 150 dwellings per annum over the entire Plan period compared to the SEP). Thus, not only is the PSCS DPD not legally compliant in failing to be in accordance with the Development Plan (or its time period), but also it is not sound, as no satisfactory justification has been provided for the substantial reduction in the housing requirement and over an extended plan period. Moreover, no justification has been made as to why the council fails to take on board the evidence which clearly supports a higher housing provision than that proposed within the adopted RSS, particularly taking on board the Governments growth agenda.

Details of Changes to be Made:
We therefore suggest that the submitted Core strategy needs to be amended to take into the account the extant development plan, including the South East Plan’s housing target at the very least, but with a recognition for a higher level of growth should be planned for. At the very least therefore, there needs to be a larger degree of flexibility built into the document. Whilst the Council has within paragraphs 5.18 – 5.20, as well as policy WCS5 sought to provide a contingency within the document, this does not go far enough and needs to be far more robust to take account, as indentified above of the chronic affordable housing issues that exist within the District.

Representation ID
1393
Person ID Mr Hawkins
Agent ID Mr Hawkins
343219 Charles Church Southern 102627 Bell Cornwall
WCS2 Distribution of Housing Growth 2006-2030
Policy 2

Sound ☐ Yes ☑ No ☑ Justified ☑ Effective ☑ Consistent with national policy
Legally Compliant ☐ Yes ☐ No

Details of Reasons for Soundess/ Legal Complaince:

Details of Changes to be Made:
See Bell Cornwell Supporting Statement
Details of Reasons for Soundness/ Legal Compliance:

Officers at Mid Sussex District Council are continuing to work jointly with Wealden in developing and implementing a strategic and co-ordinated approach to protecting the Ashdown Forest SAC/SPA. Work already undertaken between the two Councils has identified a series of measures to limit the impact of new development on the conservation interests of the Ashdown Forest. These measures include new development contributing to an appropriate level of mitigation in the form of providing Suitable Alternative Natural Green Space (SANGS) and support via developer contributions towards the Ashdown Forest Access Management Strategy. This strategy will need to specify measures for the management of visitors to Ashdown Forest in such a way that reduces their impact on the interest features of the designated site and will need be prepared and implemented in association with the conservators of Ashdown Forest, Natural England and other partners. In addition, further joint working will be required to develop and implement on site management measures to reduce nitrogen emissions emanating from the increased number of vehicles using the roads crossing Ashdown Forest. In combination with this, both Councils through their Local Development Frameworks will also need to delivery initiatives to reduce reliance on the motor vehicle, through creating sustainable communities, providing improvements to public transport, cycling and walking facilities. Pollution monitoring on the Forest will be required to assess the effectiveness of these measures. The recognition of this situation in paragraphs 3.22 6.34 and policy SPO1 is welcomed. The recognition within the Core Strategy of the impact on the Ashdown Forest that development within rural villages (such as Forest Road and Danehill) would have is welcomed. The strategy focussing growth at Uckfield, Crowborough, Heathfield and Hailsham and smaller- scale growth at villages within the Wealden District will go some way to minimising the negative impact development would have on the Ashdown Forest, especially in combination with further mitigation measures (such as SANGS).

Details of Changes to be Made:
Details of Reasons for Soundness/ Legal Compliance:

6. The Core Strategy is considered to be unsound on the basis that insufficient new homes are allocated for the town. This is demonstrated by reference to paragraph 6.33 which identifies a current need for 305 new affordable homes. The Core Strategy identifies only 300 new homes in total for Crowborough over its 24 year duration, which is less than its current level of need for affordable homes alone. This would appear to be a fundamental flaw in the strategy and demonstrable proof that the Core Strategy under-provides new housing allocations for Crowborough. On the basis that new development will need to provide 35% affordable homes, Crowborough will need to have allocated a minimum of 872 new homes to deliver the level of affordable housing that is presently required. Clearly for future affordable provision to be yielded, the allocated figure would need to be significantly higher.

Details of Changes to be Made:

The proposed Submission Core Strategy is unsound because the majority of housing has been allocated to settlements in the south of the district where the market is not strong enough to deliver them, and not enough housing has been directed to the northern part of the district where they can be delivered. Notwithstanding the constrains of the AONB and the Ashdown Forest Special Protection area there is scope to provide more land for housing at Crowborough and Heathfield, and in the interests of actually seeking to achieve more housing in the district these should be actively pursued in the Core Strategy. One of the particular recommendations of the Wealden Housing market Assessment is the encouragement of more smaller dwellings in the northern part of the district (para 9) this could be an integral part of achieving more dwellings in the part of the district where there is a more viable housing market.
Details of Reasons for Soundess/ Legal Complaince:

We are pleased to see that your development distribution in policy WCS2 can be accommodated within existing consented capacities at Waste Water Treatment Works (WWTW). This is particularly important at the Hailsham North and South Waste Water Treatment Works that discharge into the Pevensey Levels. The purposes of the RoC is to assess the impact of existing discharge consents into the Pevensey Levels, and make suitable changes where appropriate and fully justified. We have currently reached Stage 3 of the RoC which we are awaiting sign off from our Area Manager. We will make these results available to you at the earliest opportunity at the end of April 2011. The results will identify those consents that will require further assessment under the final Stage 4 of the RoC. We expect the final recommendations to be available by April 2012. This will be in time to inform your Site Allocations Development Plan Document. Through the course of the RoC there is a possibility that the existing consent for Hailsham North and South WWTWs will be reviewed which would have implications for the capacity of the works to accept the waste water flows from new development. We are happy that your Strategy is based on the most up to date information available, and you have addressed potential changes to existing consents through the RoC by considering phasing development with the provision of necessary infrastructure. Southern Water have also commissioned a study into alternative solutions for waste water treatment in the south of Wealden should it be needed. We therefore consider your Core Strategy sound in this regard. No Deterioration Policy We are awaiting the publication of a ‘No Deterioration’ policy from Defra. The policy will seek to achieve the Water Framework Directive (WFD) requirement of achieving good ecological status of all waterbodies and not allowing any deterioration in status. The impact of this Policy is similar to that of the Review of Consents, insofar as there is a potential risk that it will result in existing consents being tightened in line with WFD. Again, without this policy being in place, we are satisfied that your Strategy is based on the best available information and remains sound in this regard. Once the No Deterioration Policy is published we will consider how this will impact on your Site Allocations and the need for waste water infrastructure delivery.

Details of Changes to be Made:

Representation ID
1429

Person ID Ms Mears
104771 Environment Agency

Agent ID

WCS2 Distribution of Housing Growth 2006-2030
Policy 2

Sound [ ] Yes [ ] No [ ] Justified [ ] Effective [ ] Consistent with national policy

Legally Compliant [ ] Yes [ ] No

Details of Reasons for Soundess/ Legal Complaince:

We are pleased to see that your development distribution in policy WCS2 can be accommodated within existing consented capacities at Waste Water Treatment Works (WWTW). This is particularly important at the Hailsham North and South Waste Water Treatment Works that discharge into the Pevensey Levels. The purposes of the RoC is to assess the impact of existing discharge consents into the Pevensey Levels, and make suitable changes where appropriate and fully justified. We have currently reached Stage 3 of the RoC which we are awaiting sign off from our Area Manager. We will make these results available to you at the earliest opportunity at the end of April 2011. The results will identify those consents that will require further assessment under the final Stage 4 of the RoC. We expect the final recommendations to be available by April 2012. This will be in time to inform your Site Allocations Development Plan Document. Through the course of the RoC there is a possibility that the existing consent for Hailsham North and South WWTWs will be reviewed which would have implications for the capacity of the works to accept the waste water flows from new development. We are happy that your Strategy is based on the most up to date information available, and you have addressed potential changes to existing consents through the RoC by considering phasing development with the provision of necessary infrastructure. Southern Water have also commissioned a study into alternative solutions for waste water treatment in the south of Wealden should it be needed. We therefore consider your Core Strategy sound in this regard. No Deterioration Policy We are awaiting the publication of a ‘No Deterioration’ policy from Defra. The policy will seek to achieve the Water Framework Directive (WFD) requirement of achieving good ecological status of all waterbodies and not allowing any deterioration in status. The impact of this Policy is similar to that of the Review of Consents, insofar as there is a potential risk that it will result in existing consents being tightened in line with WFD. Again, without this policy being in place, we are satisfied that your Strategy is based on the best available information and remains sound in this regard. Once the No Deterioration Policy is published we will consider how this will impact on your Site Allocations and the need for waste water infrastructure delivery.

Details of Changes to be Made:

Representation ID
1405

Person ID 334590 University of Brighton
334590 University of Brighton

Agent ID 334578 King Sturge Llp

Ager

WCS2 Distribution of Housing Growth 2006-2030
Policy 2

Sound [ ] Yes [ ] No [ ] Justified [ ] Effective [ ] Consistent with national policy

Legally Compliant [ ] Yes [ ] No

Details of Reasons for Soundess/ Legal Complaince:

2. Paragraph 5.9 confirms that housing figures set out in Policy WCS2 make no provision for windfall sites, but completions on windfall sites will count towards the overall house building totals achieved in Wealden. However, it should be clarified that these will be additional to the housing figures referred to in Policy WCS2. In this regard the wording of paragraph 5.17 is unclear and seems to potentially contradict Policy WCS2. In view of the higher housing allocation in the South East Plan, there is no justification for windfall sites to be counted against the total 9,600 housing figure.

Details of Changes to be Made:
Details of Reasons for Soundess/ Legal Complaince:
b) Policy WCS2: Distribution of Housing Growth – COMMENT/OBJECT 2.21 Policy WCS2 Distribution of Housing Growth 2006 – 2030 sets out how the quantum of housing is to be distributed throughout the District to meet the overall growth. WDC has assessed sites that have already been built or committed since 2006 (4,889 dwellings) and calculated the required new allocations (4,685 dwellings) to meet the remaining overall requirement (9,574 dwellings). This distribution is assessed on a town-by-town basis in Section 8 of BP2: Managing the Delivery of Housing. 2.22 In identifying the existing commitments (4,889 dwellings), it is considered the Evidence Base, specifically BP2: Managing the Delivery of Housing, should provide for a schedule detailing the sites which make up this component of the supply including an assessment of their ‘deliverability’. This is especially important in the light of the failure to deliver the required level of housing completions either against the SEP or the proposed CS figure as set out in Table 1 above. This would ensure that the number of new allocations required to be identified (4,685 dwellings) is demonstrated to be sufficient to meet the overall requirement (9,600 dwellings). 2.23 However, upon reviewing Section 10 of BP2: Managing the Delivery of Housing, and associated Appendices 8 and 12, it is considered the Evidence Base does not adequately demonstrate the schedule of sites that are ‘committed’ and is actually silent on the matter. Therefore the Core Strategy could be not be considered ‘justified’ in this respect, as the evidence to support this assumption has not been presented within the Evidence Base (the AMR 2010 also does not have a site by site schedule). 2.24 We therefore consider WDC has not demonstrated the ‘deliverability’ of existing commitments or evidenced the site by site schedule that supports the 4,889 dwelling figure. We therefore consider WDC is currently ‘unsound’ in its approach to demonstrate the quantum of new allocations is sufficient to meet the overall housing requirement.

Details of Changes to be Made:
b) Policy WCS2: Distribution of Housing Growth – COMMENT/OBJECT 2.21 Policy WCS2 Distribution of Housing Growth 2006 – 2030 sets out how the quantum of housing is to be distributed throughout the District to meet the overall growth. WDC has assessed sites that have already been built or committed since 2006 (4,889 dwellings) and calculated the required new allocations (4,685 dwellings) to meet the remaining overall requirement (9,574 dwellings). This distribution is assessed on a town-by-town basis in Section 8 of BP2: Managing the Delivery of Housing. 2.22 In identifying the existing commitments (4,889 dwellings), it is considered the Evidence Base, specifically BP2: Managing the Delivery of Housing, should provide for a schedule detailing the sites which make up this component of the supply including an assessment of their ‘deliverability’. This is especially important in the light of the failure to deliver the required level of housing completions either against the SEP or the proposed CS figure as set out in Table 1 above. This would ensure that the number of new allocations required to be identified (4,685 dwellings) is demonstrated to be sufficient to meet the overall requirement (9,600 dwellings). 2.23 However, upon reviewing Section 10 of BP2: Managing the Delivery of Housing, and associated Appendices 8 and 12, it is considered the Evidence Base does not adequately demonstrate the schedule of sites that are ‘committed’ and is actually silent on the matter. Therefore the Core Strategy could be not be considered ‘justified’ in this respect, as the evidence to support this assumption has not been presented within the Evidence Base (the AMR 2010 also does not have a site by site schedule). 2.24 We therefore consider WDC has not demonstrated the ‘deliverability’ of existing commitments or evidenced the site by site schedule that supports the 4,889 dwelling figure. We therefore consider WDC is currently ‘unsound’ in its approach to demonstrate the quantum of new allocations is sufficient to meet the overall housing requirement.
Distribution of housing growth 2006 – 2030 (Policy WCS2) 1 The majority of proposed new housing is to be provided in the southern part of the District. The highest number of additional dwellings (1300) is proposed for Hailsham, which is in addition to the 1645 dwellings already built or committed. Thus Hailsham is intended to receive 2945 dwellings over the 24 years of the plan period. This represents 123 dwellings per year. 2 What these figures fail to take into account is the ability of the local housing market in any given part of the District to generate sales of new dwellings. There is a limit to the number of dwellings that can be sold in Hailsham in any given year, which reflects is comparatively weaker strength and vitality of the local housing market. Developers will not build more houses than they are reasonably sure they can sell and the development industry perception of the markets in different parts of the District. The Wealden Housing Market Assessment published in 2007 sets out the “Drivers in the Development Industry” (paragraph 1.69) as follows: · The type and size of dwelling they (a developer) have succeeded in selling in either the local area of in other similar locations (and therefore for which there is a known market). · The scale of demand or pressure on particular dwellings in the existing stock – through discussion with local agents. · Related to the above, the return on capital invested i.e. the mix of dwellings that will provide a quick sale once completed. · The value of the land once contributions for affordable housing and other obligations have been factored in. 3 It is considered that these factors have not been properly taken into account. The market in Hailsham is not strong enough to ensure that at least 123 dwellings per year over a 24 year period can be delivered. Just because the settlement has been identified as being suitable for this much housing and is even in need of it, does not mean that it will be provided. The delivery of the housing is wholly dependent on the development industry being able to sell it and it is not considered that any evidence from house builders or agents has been obtained to support the Council’s view that this amount of housing can be delivered in Hailsham in the plan period. 4 It is also considered that the same issues apply to the proposed allocation in Polegate/Willingdon and Stone Cross/Westham. These are all close together in a relatively small part of the south of the District and together they account for 4,902 of the dwellings proposed in the Strategy (51%). The Council’s strategy for this part of the District will also result in the loss of the individual identity of these Wealden settlements as they will effectively become an urban extension of north Eastbourne. A further relevant factor is that the housing market in the south of the District is weaker compared to the stronger market in the northern part of the District. A contributory reason is the proximity to north Eastbourne and the high level of housing provision in he adjacent Borough especially associated with Sovereign Harbour. 5 The part of the District where the market is known to be strongest is in the north, a fact that is recognised at paragraph 2.17 of the Core Strategy that states: “Wealden’s good quality of life and its proximity to London and the Gatwick growth area, creates a high demand for housing, especially in he north of the District. Demand has in the past exerted considerable upward pressure on house prices and has caused a widening gulf between local incomes and market prices and let to severe shortages of affordable housing.” (our emphasis) This is the area where the Council can be far more confident that the amount of new housing needed can be delivered. The total number of proposed units in Crowborough, edge of Tunbridge Wells and Heathfield is only 1,557, which is only 16% of the total. Even if half of the number to be provided in the rural villages is added, this only brings the number to 2,243 (23%). Uckfield is not the northern part of the District where the market is strongest.

Details of Changes to be Made:
6 The Proposed Submission Core Strategy is unsound because the majority of housing has been allocated to settlements in the south of the District where the market is not strong enough to deliver them, and not enough housing has been directed to the northern part of the District where they can be delivered. Notwithstanding the constraints of the AONB and the Ashdown Forest Special Protection Area, there is scope to provide more land for housing at Crowborough and Heathfield and in the interest of actually seeking to achieve more housing in the District these should be actively pursued in the Core Strategy. One of the particular recommendations of the Wealden Housing Market Assessment is the encouragement of more smaller dwellings in the northern part of the district (paragraph) in this could be an integral part of achieving more dwellings in the part of the District where there is a more viable housing market.
Details of Reasons for Soundness/ Legal Complaint:
Crowborough Area Strategy (paragraphs 6.33 – 6.38: Policy WCS2, Figure 9) 1 The Core Strategy is considered to be unsound on the basis that insufficient new homes are allocated for the town. This is demonstrated by reference to paragraph 6.33 which identifies a current need for 305 new affordable homes. The Core Strategy identifies only 300 new homes in total for Crowborough over its 24 year duration, which is less that its current level of need for affordable homes on their own. This would appear to be a fundamental flaw in the strategy and demonstrable proof that the Core Strategy under-provides new housing allocations for Crowborough. On the basis that new development will need to provide 35% affordable homes, Crowborough will need to have allocated a minimum of 872 new homes to deliver the level of affordable housing that is presently required. Clearly for future affordable provision to be yielded, the allocation figure would need to be significantly higher. 2 It is considered that the Core Strategy is unsound in that it cannot meet the future housing needs of market homes and affordable homes through the allocation proposed in Policy WCS2. To make the Core Strategy sound, it is considered that the housing allocation should be increased to a figure in the order of 900 new homes.

Details of Changes to be Made:
3 Land that is available and free of constraint is identified in the Council’s SHLAA as a suitable site for allocation and early release (site 095/1110). It can make a material contribution to the higher overall strategic allocation that is required by the town. Unlike many of the town’s potential peripheral sites, it is not within the AONB which is considered to be a material advantage.

Details of Reasons for Soundness/ Legal Complaint:
We would broadly support the distribution of housing growth around the edges of the towns in the district but we will refer to the numbers allocated to rural villages further on. Similarly the distribution of employment as indicated seems a little skewed, ignoring the rural villages altogether. We feel that the growth in employment opportunities is the key to sustainability of rural communities. The Growth in employment opportunities is directly correlated to the growth of housing.

Details of Changes to be Made:
Effective
Consistent with national policy

6. The Proposed Submission Core Strategy is unsound because the majority of housing has been allocated to settlements in the southern part of the district where the market is not strong enough to deliver them, and not enough housing has been directed to the northern part of the district where they can be delivered. Notwithstanding the constraints of the AONB and the Ashdown Forest Special Protection Area there is scope to provide more land for housing at Crowborough and Heathfield, and in the interests of actually seeking to achieve more housing in the district these should be actively pursued in the Core Strategy. One of the particular recommendations of the Wealden Housing Market Assessment is the encouragement of more smaller dwellings in the northern part of the district (paragraph 9) in this could be an integral part of achieving more dwellings in the part of the District where there is a more viable housing market.
Details of Reasons for Soundness/ Legal Complaince:

(Policy WCS2) 1 The majority of new housing is proposed to be provided in the southern part of the district. The highest number of additional dwellings (1300) is proposed for Hailsham, which is in addition to the 1645 dwellings already built or committed. Thus Hailsham is intended to receive 2945 dwellings over the 24 years of the plan period. This represents 123 dwellings per year. 2 What these figures fail to take into account is the ability of the local housing market in any given part of the District to generate sales of new dwellings at prices that will enable developers to implement viable developments. There is a limit to the number of dwellings that can be sold in Hailsham in any given year, which reflects the strength and vitality of the local housing market. Developers will not build more houses than they are reasonably sure they can sell at a price that reflects an appropriate profit level. The Wealden Housing Market Assessment published in 2007 sets out the “Drivers in the Development Industry” (paragraph 1.69) as follows: · The type and size of dwelling they (a developer) have succeeded in selling in either the local area or in other similar locations (and therefore for which there is a known market). · The scale of demand or pressure on particular dwellings in the existing stock – through discussion with local agents. · Related to the above, the return on capital invested i.e. the mix of dwellings that will provide a quick sale once completed. · The value of the land once contributions for affordable housing and other obligations have been factored in. 3 It is considered that these factors have not been properly taken into account. The market in Hailsham is not strong enough to ensure that at least 123 dwellings per year over a 24-year period can be delivered. Just because the settlement has been identified as being suitable for this much housing, and is even in need of it, does not mean that it will be provided. The delivery of the housing is wholly dependent on the development industry being able to sell it and it is not considered that any evidence from house builders or agents has been obtained to support the Council’s view that this amount of housing can be delivered in Hailsham in the plan period. 4 It is also considered that the same issues apply to the proposed allocations in Polegate / Willingdon and Stone Cross / Westham. These are all close together in a relatively small part of the south of the district, and together they account for 4,902 of the dwellings proposed in the Strategy (51%). The Council’s strategy for this part of the District will also result in the loss of the individual identity of these Wealden settlements as they will effectively become an urban extension of north Eastbourne. 5 The part of the District where the market is known to be strongest is in the north, a fact that is recognised at paragraph 2.17 of the Core Strategy which states: "Wealden’s good quality of life, and its proximity to London and the Gatwick growth area, creates a high demand for housing, especially in the north of the District Demand has in the past exerted considerable upward pressure on house prices, and has caused a widening gulf between local incomes and market prices, and led to severe shortages of affordable housing.” (our emphasis) This is the area where the Council can be far more confident that the amount of new housing needed can be delivered. The total number of proposed units in Crowborough, edge of Tunbridge Wells and Heathfield is only 1,557, which is only 16% of the total. Even if half of the number to be provided in the rural villages is added, this only brings the number to 2,243 (23%). Uckfield is not in the northern part of the District where the market is strongest. 6 The Proposed Submission Core Strategy is unsound because the majority of housing has been allocated to settlements in the south of the District where the market is not strong enough to deliver them, and not enough housing has been directed to the northern part of the district where they can be delivered. Notwithstanding the constraints of the AONB and the Ashdown Forest Special Protection area there is scope to provide more land for housing at Crowborough and Heathfield, and in the interests of actually seeking to achieve more housing in the District these should be actively pursued in the Core Strategy. One of the particular recommendations of the Wealden Housing Market Assessment is the encouragement of more smaller dwellings in the northern part of the district (para 9) in this could be an integral part of achieving more dwellings in the part of the District where there is a more viable housing market.

Details of Changes to be Made:

More housing should be identified at Heathfield and Crowborough. A minimum of 500 dwellings should be provided at Heathfield and a minimum of 900 dwellings at Crowborough (both excluding existing commitments etc.)
1. The description of Crowborough set out in paragraph 6.33 includes a number of comments that are either incorrect, or of questionable relevance. It is suggested that the number of people living in the town that also work in the town is low, however there is no indication as to what the Council think it should be. There can be no doubt that compared to Stone Cross and Westham, Willingdon and Polegate the proportion is actually much higher, and yet the strategy aims to locate far more housing in these settlements than Crowborough. There is no justification for this inconsistent approach. 2. The Council mentions that the railway station is some distance from the town centre. In practice however, the majority of the residents of Crowborough do not live in the town centre, and a very large proportion of them live within easy walking distance of the railway station. The service is well-used. By comparison, Hailsham, where most the largest housing allocations are proposed, does not have a railway service at all, as well as relatively limited bus links. The location of Crowborough’s railway station is no justification for suggesting that the town is less suited to new development. 3. The Council refers to out-commuting to Tunbridge Wells, East Grinstead and Uckfield, however there is no mention of the number of Crowborough residents that commute into London. it is not accepted that significant number of Crowborough residents commute to East Grinstead or Uckfield, however it is known that a very large number commute to London, using the train service. This is a sustainable form of living and working which the Council has made no reference to. 4. The Council states that “the employment centres in the town attract vehicles along unsuitable restricted residential roads”. This is a wholly misleading over-generalisation. Not all existing employment sites are as inaccessible as suggested. 5. The need for more employment in the town, and the significant housing need that exists are clear and should be given significant weight. What should be taken into account is the stronger housing market that in the town compared to much of the rest of the district. The fact that it is close to Tunbridge Wells makes it a desirable place to live, as does the good train service into London, and the attractive landscape around the town. This means that it can deliver housing at a higher and more consistent rate than many other parts of the District. 6. The Core Strategy is considered to be unsound on the basis that insufficient new homes are allocated for the town. This is demonstrated by reference to paragraph 6.33 which identifies a current need for 304 new affordable homes. The Core Strategy identifies only 300 new homes in total for Crowborough over its 24 year duration, which is less than its current level of need for affordable homes alone. This would appear to be a fundamental flaw in the strategy and demonstrable proof that the Core Strategy under-provides new housing allocations for Crowborough. On the basis that new development will need to provide 35% affordable homes, Crowborough will need to have allocated a minimum of 872 new homes to deliver the level of affordable housing that is presently required. Clearly for future affordable provision to be yielded, the allocated figure would need to be significantly higher. 7. It is considered that the Core Strategy is unsound in that it cannot meet the future housing needs of market homes and affordable homes through the allocation proposed in Policy WCS2. Figure 10 identifies land for an urban extension to the south-east of the town. This land is not in the AONB, well away from the exclusion zone around the Ashdown Forest Special Protection Area, close to the station and close to existing employment area. In view of all of these factors, and the ability of Crowborough to deliver more houses within the plan period than many of the other settlements it is considered that there is no justification in restricting the number of new dwellings allocated for the town to just 300. The town could easily deliver 90 additional dwellings per year over the remainder of the plan period and the number allocated should be at least 900.

Details of Changes to be Made:
At least 900 new dwellings should be provided at Crowborough.
Details of Reasons for Soundness/ Legal Compliance:
The Proposed Submission Core Strategy places far too much weight on the “topographical and landscape constraints” that are said to affect the town, and far too little weight on the needs of the town in terms of its future housing and other development. While the A265 passes through the town this is not a constraint. Sites that are suitable for development as logical urban extensions are available that have perfectly adequate access. While some AONB land will need to be released, this will not have a detrimental impact on the wider landscape. The needs of the town, and the ability of the town to contribute more fully to the needs of the district as a whole are not properly recognised in the Core Strategy. 2 Additional new housing development would meet the town’s known housing needs, as well as make a significant contribution towards the shortfall of housing in the District that will occur within the plan period. The housing market in Heathfield is stronger than those settlements in the south of the District where the majority of new housing has been focussed. It will increase the demand for public transport services, and allow the existing service to be maintained and improved. 3 The Council has identified land within the AONB on the north-western side of the town for new housing development, but the number of units has been limited to 160. It is considered that this figure should be much higher, not only because the town has the services and facilities needed to serve a larger number of households, it would also help to safeguard the future vitality and viability of the town. The restrictive strategy currently proposed will only encourage dormancy in the settlement and actually harm the quality of life and standard of living of the local community in the longer term. 4 The Council has stated in its Core Strategy Background Paper in Housing Land Availability that it will assume a build-out rate of 60 dwellings per year on sites of less than 199 units (paragraph 2.7). This means that the housing on the allocated land will be completed and disposed of in just over two years. The town will then have a period of around 15 years until the end of the plan period when there will be no housing development except for a trickle of windfall sites. This cannot be a justifiable approach. 5 Figure 10 identifies land adjacent to the town that is proposed for an urban extension. The figure is inaccurate because not all of the land to the north of the A265 is open to views from the wider landscape. In fact much of this land is enclosed by hedgerows and woodland planting. There would not be any undue impact on the wider landscape from a sensitively designed development. 6 In addition, this figure excludes land to the west of the area identified for an urban extension that is not in the AONB. The land at Tilsmore lodge is accessible, and visually and physically well-contained. Any urban extension to the north of the A265 should include this land. 7 The Core Strategy is unsound as it fails to make sufficient housing provision for the town. It is also unsound because it fails to provide sufficient numbers of affordable homes. Paragraph 6.40 states that there is a current need for affordable housing for 112 households. To meet that demand from new development (based on a requirement of 35% affordable provision in Policy WCS8), a minimum of 320 new homes will be required in Heathfield to meet this current demand. Because demand is not static, there will be further need for affordable housing throughout the Core Strategy period. To achieve its delivery targets for affordable homes, the allocated number of homes for Heathfield realistically needs to be in the order of 500 + over the duration of the Core Strategy, but with a significant allocation in the early phases to meet current demand.

Details of Changes to be Made:
A minimum of 500 dwellings should be provided at Heathfield, and Figure 10 should be amended to enlarge the area for residential provision to include the land to the west.
The figure is inaccurate because not all of the land to the north of the A265 is open to views from the wider landscape. In fact much of this land is enclosed by hedgerows and woodland planting. There would not be any land suitable for development as logical urban extensions are available that have perfectly adequate access. While some AONB land will need to be released, this will not have a detrimental impact on the wider landscape. The needs of the town, and the ability of the town to contribute more fully to the needs of the District as a whole are not adequately recognised in the Core Strategy. 2. Additional new housing development would meet the town’s known housing needs, as well as making a significant contribution towards the shortfall of housing in the District that will occur within the plan period. The housing market in Heathfield is stronger than those settlements in the south of the District where the majority of new housing has been focussed. Heathfield need higher levels of new housing to provide more buoyancy in the market and choice for residents which will in turn avoid outward migration from the town and the risk of declining services and social infrastructure. A higher housing allocation will increase the demand for public transport services and future provision and allow the existing service to be maintained and improved. 3. The Council has identified land within the AONB on the north-western side of the town for new housing development, but the number of units has been limited to 160. It is considered that this figure should be much higher, not only because the town has the services and facilities needed to serve a larger number of households, but it would also help to safeguard the future vitality and viability of the town. The restrictive strategy currently proposed will only encourage dormancy in the settlement and actually harm the quality of life and standard of living of the local community in the longer term. 4. The Council has stated in its Core Strategy Background Paper in Housing Land Availability that it will assume a build-out rate of 60 dwellings per year on sites of less than 199 units (paragraph 2.7). This means that the housing on the allocated land will be completed and disposed of in just over two years. The town will then have a period of around 15 years until the end of the plan period when there will be no housing development except for a possible trickle of windfall sites. This cannot be a supportable approach. 5. Figure 10 identifies land adjacent to the town that is proposed for an urban extension. The figure is inaccurate because not all of the land to the north of the A265 is open to views from the wider landscape. In fact much of this land is enclosed by hedgerows and woodland planting. There would not be any undue impact on the wider landscape from a sensitively designed development. Similarly land adjoining the eastern settlement boundary has limited visual and landscape constraints which is explained in the submitted Landscape Character and Visual Impact Report. 6. The Core Strategy is unsound as it fails to make sufficient housing provision for the town. It is also unsound because it fails to provide sufficient numbers of affordable homes. paragraph 6.40 states that there is a current need for affordable housing for 112 households. To meet that demand from new development (based on a requirement of 35% affordable provision in Policy WCS8) a minimum of 320 new homes will be required in Heathfield to meet this current demand. Because demand is not static there will be further need for affordable housing throughout the Core Strategy period. To achieve its delivery targets for affordable homes, the allocated number of homes for Heathfield realistically needs to be in the order of 500+ over the duration of the Core Strategy, but with a significant allocation in the early phases to meet current demand. Due to the size of additional appendices they have not been uploaded but are available to view at the Council’s offices.

Details of Changes to be Made:

7. Land to the east of the town has been put forward for inclusion in earlier incarnations of the Core Strategy, principally SHLAA sites 258/1210; and 259/1210 on the norther side of the A265 and additionally SHLAA sites 260/1210; 275/1210 and 299/11210 on the southern side of the A265. The land is available and can deliver highway improvements, new homes, open space and community provision at an early stage in a comprehensive approach. The Core Strategy is simply wrong at paragraph 6.41 where it states that there are no suitable alternative sites available. The above are sites that are demonstrably available and suitable as the submitted supporting reports clearly indicate. This land is favoured by the Parish Council for development and if allocated for in the order of 250 new homes, existing highway constraint would be addressed and contributions secured to provide social and community provision (such as the needed swimming pool identified at paragraph 6.39). This can be achieved at this scale and level of development but would not achieve these objectives at the level proposed in the Core Strategy. New housing at the proposed level will maintain the town’s future vitality and...
Summary of all Representations - Proposed Submission Core Strategy Regulation 27 - Report 11th July 2011

Economic wellbeing and will help to maintain local services and avoid the prospects of Heathfield being starved of investment and resources in the future, with the very real risk that present services will decline, and for the town to simply become no more than a commuter town for the larger centres of Tunbridge Wells, Eastbourne and beyond.

Representation ID
416

Person ID Mr Ide
521977 Batcheller Monkhouse

Agent ID Mr Ide
335759 Batcheller Monkhouse

WCS2 Distribution of Housing Growth 2006-2030

Policy 2

Details of Reasons for Soundness/ Legal Complaince:
The majority of the district is rural area. The Core Strategy recognises that it is important that villages and rural settlements remain vital and that they are sustained throughout the Plan period, so that they can meet their roles as described within the settlement hierarchy of the Plan. The removal of development boundaries from a number of settlements reduces the spread of development within the countryside. Rural Growth Areas shown under Policy WCS6 therefore assume more importance in delivering the Core Strategy. Ninfield is better placed than neighbouring settlements to accommodate development. A housing figure of 50 units has been allocated to Ninfield, but this was set in the context of a number of sites having development potential. My client’s land at Ingram’s Farm, Ninfield, appears to be the least constrained and it has the capacity to accommodate in excess of 50 units. For all the above reasons, it is recommended that the housing quota for Ninfield is raised. Proposed Change

Details of Changes to be Made:
The Ninfield housing allocation be raised from 50 to 100 units.
### Representation ID

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### Sound

- Yes
- No
- Justified
- Effective
- Consistent with national policy

### Legally Compliant

- Yes
- No

### Details of Reasons for Soundness/ Legal Complaince:

Para 3.15 of the submission document states that “The town of Tunbridge Wells is situated on the boundary of Wealden, and provides limited opportunities of extensions to that urban area, albeit situated within the rural parish of Frant. An extension to this urban area, compatible with the surrounding character of the area and located outside of the Area of Outstanding Natural Beauty, would help to address wider housing needs, by providing housing opportunities in an area of Wealden that in itself has limited potential due to the landscape designation.” The summary of the Core Strategy (page i) does not make reference to an urban extension within Frant, nor is there a Frant ‘Area Strategy’ like the other urban extensions, for example, Heathfield. In Figure 5 Phasing of Development, it is clear that the proposed urban extension in Frant starting in 2026 will provide 120 dwellings when completed in 2030. However, it is unclear whether the proposed allocation for 120 dwellings in this area refers to only Wealden’s housing needs or to the housing needs of a wider area. As the total number of dwellings proposed at this site (120) is included in full within Wealden’s proposed housing allocations for 2006-2030, it is assumed that “wider housing needs” refers to the housing needs of this rural part of Wealden District. It should also be addressed that, as part of the Rural Areas Strategy, Wealden District Council’s Core Strategy proposes 20 dwellings “in Frant village, in addition to the urban extension adjacent to Tunbridge Wells situated within the Parish of Frant” (page 55), bringing the total number of dwellings proposed for the Parish of Frant to 140 dwellings. In the background document “Development of the Proposed Submission Document” (BP1) at para 8.60, with specific reference to land adjacent to the boundary of Tunbridge Wells in Frant Parish, it is stated that although the area/site was “initially considered under the rural settlement hierarchy, the potential for development adjacent to Tunbridge Wells, albeit within the parish of Frant, is in effect an urban extension of that particularly sustainable town. Due to this high degree of sustainability, and the need to meet housing needs in the wider area, the area is considered suitable for growth. Based on SHLAA information, and taking into account contaminated land issues the broad location can yield around 120 dwellings”. It is therefore explicitly stated that the area in Frant adjacent to the boundary with Tunbridge Wells is being identified as an urban extension to Tunbridge Wells, while providing housing numbers for the District of Wealden. A reasoned justification needs to be given for this proposal. Frant is designated as an “other unclassified settlement” in Wealden District’s settlement hierarchy. As such, its function (according to this hierarchy) is having “few or no facilities and services, and where further development would be unsustainable.” It is therefore to be expected that residents of Frant, including those resident at the proposed allocation, will depend upon other centres to meet a broad range of needs; the nearest main service centre easily accessible to the village of Frant being Royal Tunbridge Wells. In effect, development at Frant would be an extension to Royal Tunbridge Wells and the release of greenfield land would be unlikely to meet the needs of Wealden’s residents given its location away from the District and Service centres located within Wealden and identified in Wealden’s settlement hierarchy. Development in this location is therefore unlikely to meet the wider housing needs of Wealden’s residents in terms of associated infrastructure and services. As part of reviewing Tunbridge Wells Borough Council’s Core Strategy during 2010/11, a detailed assessment of the capacity of greenfield sites around the built up area of Royal Tunbridge Wells and Southborough is currently being carried out as well as a review of the inner boundaries of the Green Belt to ensure that Rural Fringe sites provide a long-term supply of land safeguarded to meet the Borough’s growth requirements beyond 2026, to 2031. This is within the framework of Tunbridge Wells Borough’s Core Strategy that seeks to prioritise the use of previously developed land (PDL) within the Limits to Built Development (LBD) in the future development of Royal Tunbridge Wells. Consequently, it is considered premature if Wealden District Council makes an allocation on greenfield land at Frant. An allocation on this site will in effect be an allocation of greenfield land on the edge of Royal Tunbridge Wells without it having been considered and assessed within the wider context of the capacity of the Borough’s sites, including greenfield sites, around the built up area. As established through the examination into the Core Strategy, Tunbridge Wells Borough Council’s housing trajectory included a number of predominantly greenfield/mix (of greenfield/PDL) sites ‘contiguous’ with (adjacent to) the LBD of the Main Urban Area (Royal Tunbridge Wells and Southborough) and Small Rural Towns, which were used to show how the Local Planning Authority (LPA) could meet the South East Plan housing requirement. This included one of the Borough Council’s designated Rural Fringe Sites at Hawkenbury Farm (off Hawkenbury Road/Maryland Road). Should it prove necessary to utilise the Rural Fringe site at Hawkenbury to meet development needs in Tunbridge Wells Borough, the proposed site in Frant would have an added impact on the infrastructure and services within this area. The
proximity of the site in Frant to this designated Rural Fringe site should be considered. The implications on the infrastructure and environment of both sites being developed should be addressed by Wealden’s submission Core Strategy. Wealden District Council’s submission Core Strategy recognises that the expected contribution from PDL over the period 2010-2030 may be nearer to 35%, rather than the national annual target of 60% set out in Planning Policy Statement 3: Housing (PPS3). If this is the case, it should be clarified whether it is envisaged that the national average will be met by a higher proportion of PDL sites being developed in other, more urban areas of the South East region. In Wealden’s proposed submission Core Strategy it is noted that, over the past 10 years, around 200 dwellings per annum have been provided as windfalls. As completions of windfall sites will count towards the overall house building totals, the District Council’s Core Strategy should clarify what mechanism is to be used to manage the release of greenfield sites if a larger than expected amount of windfall development on PDL comes forward. The decision to apply “countryside constraints” on neighbourhood centres and unclassified settlements could severely restrict the lowest two categories of settlements and create smaller rural settlements with limited, or no, basic services/facilities. It may be worthwhile considering a more permissive approach at these settlements that would enable a degree of development to maintain and support the existing services. This could then reduce the requirement to develop in rural areas that would be dependent upon an urban area outside Wealden’s boundaries for its services. The Core Strategy should, in any case, give further explanation regarding the “countryside constraint” approach; in particular, the expected impact this could have on the long term sustainability of a large number of the District’s small settlements. Impact on Tunbridge Wells’ Infrastructure Residents of developments close to the boundary with Tunbridge Wells Borough are more likely to use the services/facilities provided by the urban area of Tunbridge Wells than the more limited range provided by the closest, smaller Wealden settlement of Frant which, as stated above, is considered to be a local service centre with limited social and economic infrastructure. Therefore, Tunbridge Wells Borough Council would wish to be engaged in cross-boundary negotiations from the outset to ensure that the impact of any proposed development upon the community infrastructure provided by the Borough Council and upon the transport system serving the urban area of Tunbridge Wells is addressed and mitigated. This should include consideration of how any S.106 Agreements/Developers’ Contributions resulting from development would accrue to the Borough of Tunbridge Wells. Environment Although the area to the south of Tunbridge Wells, which falls within Wealden District, does not lie within the High Weald Area of Outstanding Natural Beauty (AONB), it is identified within Tunbridge Wells’ Borough Landscape Character Assessment and Capacity Study as fulfilling the function of an AONB buffer. As well as the above, the Borough Council’s concerns in relation to the Local Wildlife Site (LWS), formerly classified as a Site of Nature Conservation Interest (SNCI), adjacent to Frant, still remain. The LWS should be surveyed to establish its present value prior to a site being allocated in order that mitigation measures are a central consideration in any forthcoming development proposals. Traffic Impact The Borough Council is concerned that the local road network around Royal Tunbridge Wells is already congested at peak times. No allocation should be made before it could be demonstrated by a comprehensive Transport Assessment and modelling that the traffic impacts of the development could be mitigated. Furthermore, Kent County Council should be consulted as a Highway Authority, as well as East Sussex County Council, with reference to any proposed development within the northern part of Frant Parish close to the boundary with this Borough.

Details of Changes to be Made:

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WCS2 Distribution of Housing Growth 2006-2030

Policy 2

Sound ☐ Yes ☑ No ☐ Justified ☑ Effective ☐ Consistent with national policy
Legally Compliant ☑ Yes ☐ No

Details of Reasons for Soundess/ Legal Complaince:

The majority of the district is rural area. The Core Strategy recognises that it is important that villages and rural settlements remain vital and that they are sustained throughout the Plan period, so that they can meet their roles as described within the settlement hierarchy of the Plan. The removal of development boundaries from a number of settlements reduces the spread of development within the countryside. Rural Growth Areas shown under Policy WCS6 therefore assume more importance in delivering the Core Strategy. At Selmeston there is the opportunity to increase housing provision to 20 units. Proposed Change

Details of Changes to be Made:

The Selmeston housing allocation be raised to 20 units.
Hallam Land Management Limited (HLM) believe that there is an insufficient distinction between Hailsham and Hellingly and those settlements outside the Sussex Coast Sub Region, and that consequently a greater proportion of the development proposed should be focused upon Hailsham (a minimum of 2000 units to reflect the available capacity within the Wastewater Treatment Plant from 2012 but with provision to increase that number if alternative solutions to the treatment of wastewater are put into place over the plan period.). HLM raise concerns about the scale of the proposed allocation at Uckfield; objection to the scale of allocations at Stone Cross and Westham on the grounds that these allocations will not contribute to achieving the Vision and Spatial Planning Objectives set in the Plan but merely further extend a dated and somewhat sprawling suburbia; raise objections to the allocation at Heathfield and Waldron on the grounds that this site is not developable; object to the allocation of 120 dwellings at Tunbridge Wells on the grounds that it is remote from the District and will not stimulate the economic activity envisaged in the “Vision” and associated “Spatial Planning Objectives” and object to the level of development being distributed across the rural villages (some 14% of the total dwellings proposed) on the grounds that this level of development is unsustainable.

Wealden’s Lead Member for Planning advocates a strategy for council lead rather than developer lead planning. To this end the sacrifice of green fields in certain locations to developers is clearly acceptable to the majority of councillors (living in toryshire). However forcing public inquiries for consent on Greenfield is relatively inexpensive; with deals locked into options the only significant front-loaded cost is for legal council and various consultants. Whilst the planning authority retains a target based planning policy a disproportionate allocation of building land in a specific locality (towards a five-year supply) can and most probably will be challenged. In regard to the Hailsham figure I estimate that there are 1100 dwellings 'not-yet-built' out of the 1645 in the category 'built or already committed'. However the member’s strategy is to allocate a further 1300 dwellings. This allocation has been made in spite of the many critical factors outlined in the Core Strategy Infrastructure Plan. It is for the planning inspector to examine or comment on the tactics employed by planning authority.
Representation ID
334
Person ID 521879 St Richards Church
Agent ID 521872

WCS2 Distribution of Housing Growth 2006-2030

Sound  No  Justified  Effective  Consistent with national policy
Legally Compliant  Yes  No

Details of Reasons for Soundess/ Legal Complaince:
Insufficient growth is allocated to Crowborough in order to satisfy the housing and other service needs of the area

Details of Changes to be Made:
The allocation in Crowborough should be increased by 150-200 dwellings

Representation ID
286
Person ID 521609 Davies-Gilbert
Agent ID 521602 Woodhams

WCS2 Distribution of Housing Growth 2006-2030

Sound  Yes  Justified  Effective  Consistent with national policy
Legally Compliant  Yes  No

Details of Reasons for Soundess/ Legal Complaince:
A ‘sound’ Core Strategy must contain evidence of the views of the local community and others who have a stake in the future of the area. Public comments on the Issues and Options Paper support a general approach within which 30% of new dwellings are allocated to rural areas. This would reflect the existing distribution of the population within the district as seen in the Wealden Profile 2009, a Core Strategy Spatial Development Options Background Paper, which states that of Wealden District’s total population, 19% live in town fringe settlements, and 32% live in villages, hamlets or isolated rural settlements. The draft Core Strategy currently states that an additional 4685 dwellings will be delivered in the period up to 2030. 30% of these dwellings is approximately 1405, greatly in excess of the provision made by WCS6 for at least 455 dwellings. It is submitted that a greater level of provision be made to the district as a whole, in addition to a greater level of provision made to rural areas under Policy WCS2 as the draft Core Strategy does not currently reflect the community’s views. In addition the draft Core Strategy is not consistent with national policy by neglecting to allocate a greater number of dwellings to rural areas. The Council should, as Planning Policy Statement 1: Delivering Sustainable Development informs “Ensure that plans are drawn up over appropriate time scales, and do not focus on the short term or ignore longer term impacts and the needs of communities in the future.” (para. 26 ii). Planning Policy Statement 7 ‘Sustainable Development in Rural Areas’ informs that the Council “should make sufficient land available, either within or adjoining existing villages, to meet the needs of local people” (para.9 i) The draft Core Strategy does not reflect public opinion or the existing development pattern within the district which could lead to valuable local services in rural areas being lost in the longer term. The overall distribution of housing proposed in WCS2 is deficient as it does not take account of public consultation responses, pay regard to the current distribution of the population, the availability of existing local services and facilities and is not consistent with national policy.

Details of Changes to be Made:
WCS2 Distribution of Housing Growth 2006-2030 Land will be allocated to meet the housing provision of WCS1 in accordance with the following distribution. Town/Settlement Built or already committed (dwellings) New allocations (dwellings) Total dwellings (2006 – 2030) Rural villages 918 3732 4650 Total Wealden 4889 10611 15500 N.B the remaining 6897 new dwellings will be distributed to Uckfield, Hailsham & Hellingly, Polegate & Willingdon, Stone Cross & Westham, Crowborough, Heathfield & Waldron and adjacent to Tunbridge Wells boundary (within Frant Parish) at the Council’s discretion taking note of the environmental constraints of certain locations.
Representation ID
297

Person ID  Ms Smith  521490  WE Vine Trust
Agent ID  Mr Gillespie  521485  Impact Planning Services Ltd

WCS2 Distribution of Housing Growth 2006-2030
Policy 2

Sound  ☒ No  ☑ Justified  ☑ Effective  ☑ Consistent with national policy
Legally Compliant  ☑ Yes  ☐ No

Details of Reasons for Soundess/ Legal Complaince:
WSC2 does not provide for sufficient housing to meet the level of development envisaged for the Distruict within the South East Plan. The Plan remains part of the development plan and is the most authoritative and up-to-date document in relation to planned provision for growth within the District. The policy is inconsistent with the South East Plan and will fail to deliver a level of development considered appropriate for the District which, through the regional planning process, fully acknowledged and addressed environmental constraints including infrastructure. The Table at WSC2 - Distribution of Housing Growth 2006 - 2030 should make provision for a total of 13,200 dwellings within the Plan Period. The Hailsham and Hellingly allocation should be reviewed and increased in the light of the completion of the development options traffic modelling only partially undertaken, the results of the current study into the waste water treatment works capacity and the introduction of a Community Infrastructure Levy (or CIL).

Details of Changes to be Made:
The Policy should be revised to provide for an increased level of housing provision to a minimum of 13,200 within the Plan Period 2006-2030. The dwelling provision figure for Hailsham and Hellingly should be increased in line with the results of infrastructure modelling, the development of a funding and phasing mechanism and introduction of a CIL mechanism.
I am now going to comment on the distribution of housing growth throughout the Wealden District. I write on behalf of Hadley Property Group, the landowner of land at 71/72 Coopers Row, Five Ash Down. My comments therefore relate to the amount of housing growth in rural areas and in Five Ash Down in particular Wealden District is a largely rural district. More than half its population live in rural areas and villages. Wealden’s towns are smaller market towns; there are no strategic urban areas within its boundaries although it is influenced by Eastbourne, Tunbridge Wells etc. The distribution of housing growth in the Proposed Submission Core Strategy is supposedly driven by the settlement hierarchy. Settlements have been classified in relation to their role in meeting residents everyday needs. The distribution of housing growth seeks to ‘reinforce this pattern rather than change it’ (paragraph 3.4 Submission Core Strategy). However the proportion of housing growth attributed to rural settlements accounts for just 9.7% of the total growth, compared to more than half the existing resident population. In defining the best approach to locating housing, PPS3 requires local authorities to consider accessibility to services including public transport. Housing should facilitate the creation of communities of sufficient size and mix to justify the development of, and sustain, community services and infrastructure. This should include rural communities, not just market towns and service centres, but in villages to enhance or maintain sustainability. ‘This should include, particularly in small rural settlements, considering the relationship between settlements so as to ensure that growth is distributed in a way that supports informal social support networks, assists people to live near their work and benefit from key services, minimise environmental impact and, where possible, encourage environmental benefits’ (paragraph 38). In the evidence presented to justify the distribution, there are settlements within the rural areas that can be described, using the Council’s matrices, as sustainable, and which can meet the day to day needs of their populations. These can be considered comparable in accessibility terms to the edges of urban areas. Development can also provide support to local services and can address needs that have been identified. This is not recognised in the small proportion of development attributed to rural areas. The Strategic Housing Market Assessment indicated that more affordable housing could be delivered in the central and northern parts of the district. This adds weight to my view that a more equitable distribution of housing land to rural areas would positively influence the delivery of affordable housing in the areas where the effect is more acute. This is particularly the case with the threshold proposed in policy WSC8 is set at 5 dwellings (or 0.2 hectares). Additionally, as I will describe below, there are fewer infrastructure constraints in the northern and central parts of the district and few affecting rural parishes. In my view this restricted level of growth in rural areas fails to reflect the existing settlement pattern and fails to support rural settlements. Evidence suggests that a greater proportion of housing growth could be accommodated within rural areas to reflect the existing settlement pattern, provide for affordable housing in rural areas and embrace flexibility and deliverability. With respect to the number of houses in rural areas therefore, it is my view that the Core Strategy is not based on robust and credible evidence. Evidence suggests a greater proportion could be accommodated in rural areas and within the north of the district. As a result I believe that the Core Strategy will not be effective in delivering housing in the areas best able to address the needs of the villages, affordability, housing need, community facilities, open space etc. I therefore find the Proposed Submission Core Strategy unsound with regard to the tests in Planning Policy Statement 12.

Details of Changes to be Made:
The current population distribution in the Wealden District is more than half live in rural areas and less than half live in one of the small towns and market towns of the district. In my view the distribution of housing growth should recognise this fact to represent the district character. Rural parishes have comparable levels of social deprivation, housing need and there is an acute need to support rural services such as schools, shops and public transport infrastructure. These services will decline if they are not supported by population and employment growth. Evidence for this is available within the background reports. It is my view therefore that a much higher proportion of growth should be distributed to rural settlements. A mere 9.7% of residential growth is distributed to rural settlements in Submission policy WSC2. In my view this should be more like 30%. This would be 2,872 dwellings if the WSC1 submission Core Strategy policy was used. If the South East Plan annual requirement to 2030 was used, this would account for 3,960 dwellings. This would mean that meaningful volumes of housebuilding could be directed to settlements that have been declared to be neighbourhood centres in the settlement hierarchy. Housing could be directed to settlements with identified housing need. Housing development could help fund infrastructure
improvements such as the provision or expansion of good rural primary schools and the provision of community facilities such as open spaces, shops, community spaces. Developer contributions could help to fund public transport infrastructure. The Strategic Housing Market Assessment reflects that rural areas and those in the north of the district have a good local housing market and that there are no constraints to delivery in these areas. In my view the most effective means to make provision for the populations in these areas is to direct housing growth to areas where it can be delivered and where meaningful positive change to rural deprivation can be made. Also, importantly, during the consultation on the initial Issues and Options Consultation in 2007 a general view was that 70% of the housing allocation should be directed to urban areas and 30% be directed to rural areas, for precisely the reasons set out above. This is reported in Background paper 6 entitled Rural Settlement Classification to the Spatial Development Options 2009. WSC2 should therefore be amended as follows: Land will be allocated to meet the housing provision of WSC1 in accordance with the following distribution: Town/Settlement* Committed/Built New allocations Total Dwellings Rural Villages 918 3042 3960 Individual sites to meet these housing allocations will be allocated in the Site Allocations DPD. The housing development for rural villages will be distributed to local service centres and neighbourhood centres of the district. * This will have a knock on effect for some of the urban areas

Representation ID
436
Person ID Mr Sim and Harvie-Smith 522011
Agent ID Mr Mayhew 522002 dowsettmayhew

WCS2 Distribution of Housing Growth 2006-2030 Policy 2

Sound [Yes] [No] [Justified] [Effective] [Consistent with national policy] Legally Compliant [Yes] [No]

Details of Reasons for Soundess/ Legal Complaince:
Planning Policy Statement 1 requires development plans to contribute to the delivery of sustainable development. In preparing development plans LPA's should seek to, amongst other things, bring forward development land taking into account issues such as accessibility and sustainable transport needs and by ensuring new development is located where everyone can access services and facilities on foot, bicycle or public transport rather than having to rely on access by car. This is amplified in Planning Policy Statement 3: Housing which states that in support of the objective of creating mixed and sustainable communities, the Government's policy is to ensure that housing is delivered in suitable locations which offer a good range of community facilities and with good access to jobs, key services and infrastructure. These obligations are acknowledged in the PSCS. In particular paragraph 2.7 states that the challenge is to focus growth where it is most accessible and sustainable. In response the PSCS sets out a settlement hierarchy as a basis for the distribution of development to ensure those places that have the greatest amount and range of employment and services and are best served by public transport are the focus of most development. The Core Strategy Background Paper entitled ‘Development of the Proposed Submission Core Strategy’ notes that Wealden towns are affected by the pull of larger and more attractive centres, particularly Tunbridge Wells, Brighton, Lewes and Eastbourne. Ensuring the vibrancy and improving the ‘offer’ of the District’s town centres is a key objective of the Core Strategy, whilst regeneration of the towns is important to the residents, to the economy, reducing carbon footprint, creating sustainable communities and reinforcing local distinctiveness and a sense of place. On this basis, a spatial distribution that focuses most housing and associated growth in the Districts larger towns, in accordance with a settlement hierarchy is supported. The settlement hierarchy was created via an assessment of (i) the accessibility and (ii) the self-sufficiency of settlements, together with a subsequent qualitative assessment. This has resulted in Table 1 of the PSCS which notes that Crowborough, Uckfield and Hailsham are the highest tier settlement, defined as District Centres. This reflects their accessibility by road and public transport and range of shops, employment opportunities and facilities such as secondary school, etc. For Uckfield in particular it is noted that it has the most popular shopping destination of the District and the largest amount of retail floorspace, with easy access to the centre by bus and train services. It has the third largest population with a high percentage of population being economically active with a significant quantum and range of employment opportunities. The identification of Uckfield as a District Centre, one of the 3 most sustainable settlements in the District is supported and is justified and renders the PSCS sound. It is therefore considered appropriate in principle for significant net additional housing growth over the plan period.

Details of Changes to be Made:
The overarching principle of focussing the majority of new development in the District within and on the edge of the main towns, is supported in principle. However, each of the five main towns (Crowborough, Hailsham, Uckfield, Heathfield, Polegate and Willingdon, and Stone Cross) have their own particular issues and constraints which affect their potential and capacity for growth. Crowborough is surrounded by the High Weald AONB and is affected by its proximity to the Ashdown Forest and the associated protection of this area afforded by the Habitats Directive. Furthermore, the Core Strategy acknowledges the proximity of Tunbridge Wells, detrimentally affects the performance of the town centre, and the number of residents living and working in the town is low. The PSCS seeks to allocate an additional 300 dwellings in Crowborough and this is considered to be a significant level of growth given the constraints. This is reflected by the contingency allocation on land to the north of the A26 on land that is within the AONB. It is considered this is inappropriate on landscape grounds. Planning Policy Statement 7 states that such areas have the highest status of protection in relation to landscape and scenic beauty and major developments should not take place in such areas, except in exceptional circumstances. Given the availability of housing land elsewhere in the District, it is not considered there are any exceptional circumstances which justify this allocation. It is therefore in conflict with national planning policy and is unsound. The contingency allocation on land to the north of the A26 at Crowborough should be deleted and land elsewhere within the District that is not affected by such national landscape designations should be allocated for housing development. Heathfield is surrounded by the High Weald AONB. Furthermore the Core Strategy acknowledges its relative inaccessibility detrimentally affects the performance of the town centre. The PSCS seeks to allocate an additional 160 dwellings in Heathfield and this is considered to be a significant level of growth given the constraints. This is reflected in the allocation of land that falls within the High Weald AONB. It is considered this is inappropriate on landscape grounds. Planning Policy Statement 7 states that such areas have the highest status of protection in relation to landscape and scenic beauty and major developments should not take place in such areas, except in exceptional circumstances. Given the availability of housing land elsewhere in the District, it is not considered there are any exceptional circumstances which justify this allocation. It is therefore in conflict with national planning policy and is unsound. The allocation for housing development to the north-west of Heathfield (SD11) should be deleted and land elsewhere within the District that is not affected by such national landscape designations should be allocated for housing development. Hailsham has been the subject of significant additional housing, either built or committed over the first years of the plan period (1645 dwellings). The PSCS seeks to allocate a further 1300 dwellings over the period up to 2030. This level of growth is limited by the capacity of the 2 waste water treatment works serving the town. The Environment Agency has confirmed that the discharge consents will not be extended due to the impact upon the Pevensey Levels. This is a Ramsar site and potential candidate Special Area of Conservation and is subject of protection under the Habitats Directive. Whilst feasibility studies are due to be undertaken to seek alternative solutions, the Environment Agency are undertaking a review of consents under the Habitats Regulations which has the potential to reduce the discharge consent beyond current levels. Furthermore a number of potential development sites around the edge of the town are relatively poorly connected by foot or non-car modes of transport. This has resulted in the allocation of land to the east of the existing built up area, despite its proximity to the Pevensey Levels, landscape sensitivity and odour control issues associated with the water treatment works in the area. The background paper to the Core Strategy also acknowledges that the town has a relatively weak housing market and the given the quantum of development already underway in the area, it is considered desirable to delay the delivery of the additional housing proposed in the Core Strategy to enable the delivery of this significant amount of housing growth. Given the constraints to growth in and around Hailsham it is considered that the quantum of growth over the period 2006-2030 is excessive. As a result the amount of proposed new allocations (1300) should be reduced and land allocated elsewhere in the District that does not experience the same constraints, and therefore has a greater prospect of delivery. This should in particular include land in and around Uckfield. This approach would deliver the most appropriate strategy and is therefore justified. The PSCS seeks to allocate some 1350 dwellings on land in and around Polegate and Willingdon, and Stone Cross and Westham. This level of growth is limited by the capacity of the waste water treatment works serving the settlements. The Environment Agency has confirmed that the discharge consents will not be extended due to the impact upon the Pevensey Levels. This is a Ramsar site and potential candidate Special Area of Conservation and is subject of protection under the Habitats Directive. Whilst a feasibility study is due to be undertaken to seek
alternative solutions, the Environment Agency are undertaking a review of consents under the Habitats Regulations which has the potential to reduce the discharge consent, beyond current levels. Furthermore, these settlements are dominated by Eastbourne in terms of their function, and as a result are relatively limited in their self-sufficiency. Due to the proximity of Eastbourne, there is no real prospect that housing growth in these settlements will deliver a greater level of self-containment, or enhancement in local services or facilities. Instead it will perpetuate the existing situation of reliance and commuting to larger centres, in particular Eastbourne. On this basis, growth in these areas will make little contribution to the over-arching purposes of growth in the District, namely to enhance employment and service provision within Wealden. It is considered that the planned housing growth in the settlements of Polegate and Willingdon, and Stone Cross and Westham should be reduced and re-allocated to settlements which have a greater prospect of benefitting from such growth in the form of enhanced employment, shopping and service provision, in particular Uckfield. This approach would deliver the most appropriate strategy and is therefore justified. The PSCS acknowledges that Uckfield acts as a hub and service centre for a wide catchment of surrounding villages and settlements; has a relatively younger population profile and two successful business areas. It also notes that the town centre has a good range and variety of shopping with scope for further expansion, which is progressing through a masterplan to guide regeneration. It is recognised that funding the required town centre improvements will need to financed by significant additional housing development. It is noted that improving the vitality and attractiveness of the town centre is a key to delivering sustainable development and improving the quality life for residents. As a result the PSCS seeks to allocate a further 1000 new dwellings in addition to the 742 that have either already been built or have been committed since 2006. It is considered that this figure should be increased. The town is the best placed of all the District’s settlement’s to deliver additional growth. It benefits from a relatively large economic and retail base and there is a clear desire and commitment to regenerate and expand this, which requires funding from additional housing growth. Given its geographic position and level of existing services, growth will provide the best opportunity of the District’s five towns to become self-sufficient. This will reduce out-commuting and reduce the carbon footprint of new housing. It is not restricted by any AONB designation and infrastructure (such as sewage treatment works etc) can all be satisfactorily provided.

Details of Changes to be Made:

The PSCS should be amended to allocate significant additional new housing growth in and around Uckfield, beyond the 1000 new dwellings set out in the table at Policy WCS2. This provides the most appropriate strategy when considered against reasonable alternatives and is therefore justified.

<table>
<thead>
<tr>
<th>Representation ID</th>
<th>Person ID</th>
<th>Agent ID</th>
<th>Reason for Soundness/ Legal Compliance</th>
</tr>
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<td>1651</td>
<td>516047</td>
<td>516026</td>
<td>Yes</td>
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<td></td>
<td>Rydon Homes Ltd</td>
<td>Sigma Planning Services</td>
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</table>

WCS2 Distribution of Housing Growth 2006-2030

Sound: Yes  No  Justified  Effective  Consistent with national policy

Legally Compliant: Yes  No

Details of Reasons for Soundness/ Legal Complaince:

The allocation of 300 new dwellings at Crowborough for the period 2006 - 2030 is not justified by the evidence base and is far too low for a town of this size and importance. It will not meet housing needs and is likely to lead to a decline in services and population and will lead to an increase in unmet housing need in town. It will also lead to an increasingly ageing population as young people go elsewhere to meet their housing needs.

Details of Changes to be Made:

Increase the dwelling allocation to Crowborough having regard to housing needs, economic growth objectives and wider housing requirements outside the District. This can be achieved by an overall increase in housing numbers rather than taking numbers away from other locations. It is also practicable without breaching capacity.
Details of Reasons for Soundess/ Legal Complaince:
"Supplementary documents have been submitted but not attached, and may be viewed at the Council offices on request".

Details of Changes to be Made:
REVISION SOUGHT. 1.3.2. A total of 13,209 homes are proposed over the plan period 2006 - 2030 with 8,411 proposed for South Wealden and 4,798. This distribution takes into account the findings of the three reports on Landscape Transport and Waste water which are appended. 1.3. In respect of Polegate the best placed area for development is that to the west of the town. Stone Cross is poorly placed in respect of landscape, sustainable transport and has few existing services and facilities within walking distance. Bramley Farm to the north of the bypass is actually favoured in the landscape assessment and could also be considered as an alternative employment location. Increase housing allocations as demonstrated as being required at sections 1.2 and 1.3 above. it should be noted that the distribution below provides for a north/south Wealden split of 8,400 : 4,800 and more properly reflects the aspirations of the Core Strategy to provide economic regeneration in South Wealden. The increases in dwellings for the north are modest and can be accommodated without detriment to Ashdown Forest as they reflect the SEPlan requirement which was tested through a Strategic Environmental Assessment. Uckfield; Built or already committed 742 New Allocations (1000) 1450 total dwellings (1742) 2192 Hailsham and Hellingly: Built or already committed 1645 New allocations (1300) 2500 Total dwellings (2945) 4145 Polegate and Willingdon Built or already committed 565 New allocations (700) 2500 Total dwellings (1265) 3065 Stone Cross and Westham Built or already committed 42 New allocations (650) 300 Total dwellings (692) 342 Crowborough Built or already committed 632 New allocations (300) 450 Total dwellings (932) 1082 Heathfield and Waldron Built or already committed 292 New allocations (160) 200 total dwellings (452) 492
Representation ID
1715

Person ID  Gall Heron Land Developments Ltd.  Agent ID  Mr Groves
107752 102592  Boyer Planning Limited

WCS2 Distribution of Housing Growth 2006-2030

Sound  ☑ Yes  ☐ No  ☐ Justified  ☐ Effective  ☐ Consistent with national policy
Legally Compliant  ☑ Yes  ☐ No

Details of Reasons for Soundess/ Legal Complaince:
The distribution of housing growth across the district is supported and is felt to be legally compliant and sound. 3.4. WCS2 Distribution of Housing Growth 2006 - 2030 3.4.1. The distribution of housing grown across the district is supported and is felt to be legally compliant and sound. The policy will see the focus of development at the main settlements whilst ensuring the smaller settlements receive sufficient development to be sustainable. 3.4.2. Uckfield and Hailsham/Hellingly are identified as the two main focuses of development. It is proposed that Uckfield will receive an allocation of 1000 new dwellings over the plan period, in addition to the 742 built or already committed dwellings. The level of development proposed for Uckfield is considered to be appropriate and recognises the sustainability of the settlement.

Details of Changes to be Made:
Details of Reasons for Soundess/ Legal Compliance:

- **2.0 Policy WCS2: Distribution of Housing Growth 2006 to 2030 Summary Response**
  - 2.1 We object to the content of the Policy as drafted on the basis that it has not been shown to be justified, effective or consistent with national policy.
  - 2.2 The target figure of 9,600 dwellings to be met within the District during the period 2006 to 2030 is significantly lower than the strategic requirement set out in the South East Plan (adopted May 2009) and fails to address identified needs.
  - 2.3 Separate but related objections have been submitted in response to Policy WCS1, the content of which is relevant to our representations submitted in response to Policy WCS2.
  - 2.4 We also object to the omission of land to the south of Hailsham, west of Station Road, as a housing allocation in helping to meet identified housing needs. The site is edged red on the attached site location plan (no. PLO90620_LP-01) and extends to approximately 5.6ha. The site could accommodate around 150 dwellings and an illustrative masterplan is attached (no. PL090620_CP-01). The site is controlled by Redrow Homes (Eastern) Ltd and there are no known onsite constraints to bringing the site forward for development in the early part of the plan period.
  - 2.5 The site should be shown on the inset to the key Diagram as a housing allocation for around 150 dwellings. Representation Housing Requirement and Affordable Provision 2.6 Hailsham has the highest requirement for affordable housing anywhere in the District. However, despite the acute affordable housing need, only 149 dwellings were completed at Hailsham in the four year period 2006 to 2010. This is equivalent to only 37 dwellings per annum. 2.7 Policy WCS2 identifies that as at 1 April 2010, there were a total of 1,645 dwellings built or already committed at Hailsham and Hellingly. Appendix 8 adds further clarity, identifying that there were 811 commitments (sites with permission) at Hailsham as at the base date. 2.8 Appendix 3 identifies that of the 811 commitments, only 306 were affordable. 2.9 The 306 affordable commitments are equivalent to just over one years’ gross housing need for the town which currently stands at 266 per annum. 2.10 Even if all of the affordable commitments were to come forward as completions, there would remain an acute shortfall in affordable housing provision to meet identified needs.
  - 2.11 Without additional housing allocations, the supply of affordable housing in Hailsham is unlikely to improve in the short to medium term. The proposed “SD” allocations to the north and east of the town are not expected to start delivering completions until 2017, 2018 and 2021/22 respectively. 2.12 Additional sites, including land controlled by our client to the south of Hailsham, should be allocated for housing to come forward in the short term to address the identified shortfall in affordable housing provision. Land to the West of Station Road, South of Hailsham 2.13 The SEP identifies Eastbourne-Hailsham as an area where the strategy is to optimise the areas potential to provide employment space and associated housing is sustainable and strategically accessible locations along the A22 corridor. 2.14 Our client’s site to the south of the Hailsham urban area provides an opportunity to meet the SEP strategy for Eastbourne-Hailsham in a sustainable location. 2.15 Continued growth together with investment in the town centre will help make Hailsham a more sustainable location in its own right. 2.16 The merits of the site as a housing allocation are summarised below: 
  - The development of the site does not affect any national, regional or local environmental designations.
  - The site is in a sustainable location, within walking distance from local services and facilities, including the town centre.
  - The scheme can deliver around 150 dwellings, including much needed open market and affordable housing.
  - A material amount of Public Open Space can be provided as part of the masterplan proposals for the site, to the benefit of the wider area generally.
  - Impact on landscape character will be limited due to the topography rising gently towards the south west corner of the site preventing long distant views into and from the wider area. This is supported further still by the mature screening formed by the disused railway further to the West.
  - The site lies within Flood Zone 1 and development of the site for housing would be in accordance with the requirements at PPS25.
  - The site offers an opportunity for local journeys to and from the town centre to be made by foot or cycle via The Cuckoo Trail.
  - Good, frequent bus services connect Hailsham town centre to Polegate and Eastbourne. Further development in Hailsham will support and help maintain the viability of these strong links.

Details of Changes to be Made:

- **Summary of Suggested Changes**
  - 2.17 The overall housing requirement to be met at Hailsham should be increased in line with our separate but related objections set out in response to Policy WCS1. 2.18 Land to the west of Hailsham, west of Station Road, should be allocated for development to provide around 150 dwellings (including affordable housing) to help meet identified housing needs in the town.
WCS2 Distribution of Housing Growth 2006-2030

Sound  Yes  No  Justified  Effective  Consistent with national policy
Legally Compliant  Yes  No

Details of Reasons for Soundess/ Legal Complaince:
The proposals for further population growth at Hailsham including urban extensions east (Policy SD2) and north (Policy SD3) of Hailsham are supported. The proposals themselves will create critical mass to provide economic and social benefit to the town. To maintain the viability of such large scale development, care should be taken to avoid excessive development contributions and to adhere strictly to the principles of Circular 05/05 namely that obligations must be. 1. relevant to planning ii necessary to make the proposed development acceptable in planning terms iii. directly related to the proposed development iv. Fairly and reasonably related in scale and kind to the proposed development; and v. reasonable in all other respects. given the scale of development and the lead time to first occupations where significant infrastructure works are required the respective 2017 and 2021 dates should be brought forward and treated with flexibility to ensure that planning permissions are granted well in advance of those dates in order to ensure completions in good time and so maintain housing land supply.

Details of Changes to be Made:
3.3 Infrastructure Delivery 3.3.1 This section of our representations refers to policies WCS2 and WSC4. It is summarised below: Section of Core Strategy: Policy WCS2 Distribution of Housing Growth 2006-2030, and WSC4 Strategic Development AreasLegally Compliant: -Sound: NoJustified: -Effective: NoConsistent with national policy: No 3.3.2 PPS12 emphasises the importance of infrastructure planning to inform the development of a Core Strategy. Wealden has produced an Infrastructure Delivery Plan (IDP, February 2011) to this end. It is a comprehensive and well presented document based upon what appears to be extensive liaison with infrastructure providers. However, the IDP clearly demonstrates the significant uncertainties surround the funding of key elements of critical infrastructure. These are most acute in relation to highway works and waste water treatment upgrades in the South of the district. 3.3.3 The Proposed Submission Core Strategy acknowledges these uncertainties, for example in relation to delivering the proposed levels of growth at Hailsham / Hellingley and Polegate/Stone Cross / Willingdon and states: “The infrastructure requirements for the delivery of development and growth in Hailsham provides an element of risk for the delivery of the spatial strategy.” (para 6.20) “The risk to delivery of this strategy relates to the highways infrastructure required for the South Wealden area, in order to mitigate the impact on the strategic routes and more localised junctions.” (para 6.32). 3.3.4 A review of the Wealden IDP reveals the extent of this uncertainty, with the following transport schemes all classified as critical to ensure delivery of development in the South of the district. None have identified funding, other than as yet uncommitted developer contributions and/or unconfirmed Highways Agency / East Sussex CC funding. South Polegate and East Willingdon 1. Signals at Cophall Roundabout 2. Improvements at junctions between A22 Jubilee Way and A27 and Dittons Road and 3. Junction improvements at A22/ A27 / A2270 intersection Junction improvements at the A2270 and Polegate High Street and at the A2270 and Wannock Road. 4. Improvements to Hempstead lane junction to alleviate traffic congestion on the A271 and Hailsham Town Centre. 5. Junction improvements at the A2270 and Polegate High Street and at the A2270 and Wannock Road. Hailsham 1. Hailsham - Relieve town centre congestion and stress at Battle Road and London Road through re-routing traffic to Summer Heath Road, including signalised junctions 2. Hailsham - Relieve town centre capacity issues through signal improvements at Battle Road / London Road and North Road / High Street junctions 3. Hailsham - A2270 and A259 Quality Bus Corridors and Eastbourne - Hailsham express bus service. 3.3.5 The first two schemes listed in relation to South Polegate and East Willingdon are on the Strategic Highway network and would therefore be expected to be at least part funded by the Department for Transport. At present none of these schemes are included within the DIT’s forward programme to 2015 or in the list of schemes under review for possible funding post 2015. The IDP assumes that all schemes will be partly reliant on developer funding through planning obligations. However, it does not provide any cost estimates for these schemes and consequently it is not possible to assess the potential scale developer contributions that may be sought, and their implications for viability (taking account of other potential claims on developer contributions including affordable housing and education). As such it is not possible to ascertain whether or not there is a reasonable prospect of delivery of the schemes in question. 3.3.6 PPS12 acknowledges that information on funding and delivery may not always be available at the time the Core Strategy is prepared. However it goes on to state: It is important therefore that the core strategy makes provision for such uncertainty and does not place undue reliance on critical elements of infrastructure whose funding is unknown. The test should be whether there is a reasonable prospect of provision. Contingency planning – showing how the objectives will be achieved under different scenarios – may be necessary in circumstances where provision is uncertain. (PPS, para 4.10) 3.3.7 This is seemingly addressed by paragraph 5.19 of the proposed submission Core Strategy which states that to ‘potential unforeseen infrastructure constraints, which may prevent housing being delivered, this plan contains contingency arrangements in the towns in the event of housing delivery substantially falling behind the trajectory’. However, it is not evident what these contingency arrangements will be, other than a review of the Core Strategy. 3.3.8 We contend that a review of the Core Strategy in itself does not provide a sufficiently flexible mechanism for responding to delays in the provision of critical infrastructure jeopardising housing and employment delivery. This is of particular relevance to the delivery of a number of the Strategic Development Areas which are considered critical to the delivery of the overall strategy (Policy WCS4); specifically: 1. SD2: Land and East Hailsham (600 dwellings) 2. SD3: Land at North Haisham (700 dwellings) 3. SD4: Land at South Polegate and East Willingdon (700 dwellings) 4. SD5: Land at Ditton Rd Polegate (employment) 5. SD6: Land at East and South East Stone Cross and SD7: Land at North
Stone Cross (650 dwellings) 3.3.9 Together, these account for 2,650 dwellings. The Core Strategy states that the Council have already identified around 4,889 dwellings. This leaves 4,711 dwellings to be provided on other sites across the district. Therefore the five sites listed above account for more than half of the uncommitted housing supply over the plan period. Non-delivery of these units will thus undermine the housing trajectory and spatial distribution in the Core Strategy, requiring alternative housing sites to come forward elsewhere. In order to mitigate this risk, the Council should revise its spatial strategy and housing trajectory so that it is less dependent upon sites which remain dependent upon infrastructure for which costs and funding sources have yet to be identified and highly uncertain. The spatial distribution of housing and growth across the district thus needs to be reviewed and amended accordingly.

Details of Changes to be Made:
SUMMARY 3.3.10 In summary we contend the Core Strategy is unsound on the grounds that it is not effective as it is not sufficiently flexible to respond to identified uncertainties surrounding the provision of infrastructure acknowledged by the Council as being critical to its delivery.

Representation ID
1731
Person ID Haffenden
522397
Agent ID Mr Lander
344515
WCS2 Distribution of Housing Growth 2006-2030
Policy 2

Sound ☐ Yes ☑ No ☑ Justified ☑ Effective ☑ Consistent with national policy
Legally Compliant ☐ Yes ☑ No

Details of Reasons for Soundess/ Legal Complaince:
Housing distribution is flawed consequent upon inadequate provision overall. SECTION FIVE - HOUSING PROVISION 5.1 In this Section we set out our comments in response to Policy WCS1 and specifically regarding the provision of homes. 5.2 Policy WCS1 proposes a provision of 9,600 dwellings in Wealden District over the period 2006 - 2030, equivalent to 400 dwellings per annum (dpa). This represents a locally-derived target which is explained in para. 3.11 of the Consultation document to be based on estimates of capacity and community aspirations. This proposed level of provision must be compared with the intention of the South East Plan whereby housing provision of 550 dpa was proposed. 5.3 National policy emphasises the need to increase the provision of housing overall and in particular so as to achieve a wider choice and improve affordability. Thus, whilst it is the intention of Government policy that Local Authorities should decide their own housing targets, these must continue to be justified by robust evidence. This point was emphasised in the CLG Guidance dated 6th July 2010 (pursuant to the purported abolition of RS). National policy (PPS12 para. 4.52) continues to require Core Strategies to be "justified, effective and consistent with national policy". 5.4 PPS3 identifies the range of considerations that need to be taken into account in determining the appropriate level of housing at Local Authority level. Para. 33 states: "Regard should be had to evidence including Strategic Housing Market Assessments, the latest Household Projections, Strategic Housing Land Availability Assessments, affordability and the impact on infrastructure." 5.5 In light of the Council's proposal to reduce significantly housing provision in the District, it is therefore instructive to compare the results of recent Household Projections published by the Government. Sub National Household Projections Wealden Household Growth 2006 - 2026 Wealden Household Growth 2006 – 2030** 2004 Base + 14,000 N/A 2006 Base + 14,000 N/A 2008 Base + 12,000 + 15,000 ** Interpolation of 2028 and 2033 projections 5.6 Thus it can be seen that whilst the latest projections imply a slightly lower level of household generation than at the time the South East Plan was issued, the projection is still substantially above the housing provision included in the South East Plan, and therefore even higher than that proposed in Policy WCS1. Other indicators (national and local) similarly point to a need for housing provision at a higher level. 5.7 Using the 2008-based data and adding a 3% allowance for vacancies indicates a locally-generated demand within Wealden District of 15,450 over the Plan period. 5.8 At para. 3.10 of the Core Strategy, the Council identifies a trend-based projection of 16,800 households, slightly higher than this. Based on the lower of the two figures, the Council proposes to make provision for only 62% of the requirement. 5.9 Furthermore, the Council has not provided any robust evidence as to why a higher figure should not be proposed. Moreover para 3.10 of the Core Strategy confirms that suitable, available and achievable sites to meet this need have been identified in the SHLAA.

Details of Changes to be Made:
5.10 Accordingly we submit that Policy WCS1 is unsound and that a housing provision of at least 550 dpa (13,200 over the period 2006 - 2030) should be proposed. Amend distribution based on review of opportunities consistent with the need to increase provision overall, including rural villages.
I am a regular driver through Benhall Mill Road and play golf at the Nevill Golf Club. I would like to comment on the proposals as follows: 1. The proposed area of potential development currently offers a semi rural and rural dimension to the edge of town. The impact of 220 dwellings would change the entire functionality of Benhall Mill Road. The road cannot support this level of development on highways grounds alone. The area would be wholly supported by the infrastructure already in place through KKC and that provision would not be provided in any way by WDC as the road and finances just don't allow for this. 2. Although the site may not be prominent in its current natural state, it most certainly would with high density development, additional traffic and demand on public transport (which is currently being reviewed as part of the cost cutting for KCC). 3 The Trust who owns the site Ref: 126/1610 was awarded an extensive Government Grant for tree plantation some years ago. The land now benefits from extensive woodland, which in principle Wealden should be looking under policy, to retain. The primary purpose of this was to enhance the natural habitat. To remove these trees now that they are ecologically and environmentally beneficial would be illogical. There are some fine examples of large Oak trees, which presumably have TPOs on them. 4. Any vehicles currently leaver Acer Avenue currently look onto an extremely pleasing green vista. The proposed density of housing, with road frontage would change the environment from pasture to high density, which is extreme. 5. Many of the large trees on the boundary of the land and running along the length of the railway are old which will impact natural renewal and noise effect to any potential houses built near the railway both at the time of development and in the future. 6. The proposal of 220 dwellings equates to approximately 600 - 800 new residents to Benhall Mill Road. This additional volume is significant would undoubtedly have an ecological effect on the AONB: noise, litter, insufficient road infrastructure to support pavements and people walking their dogs, dog foul, lack of social infrastructure (access to libraries, supermarkets, administration offices, town centres, community centres etc) and an increase in crime. 7. The ground, be definition past 126/1610 will continue to produce gases for years to come. This may pose a health risk to people living on the old tip and surrounding ground area where contamination may be an issue. 8. Benhall Mill Road is a very narrow road which would require widening to support that number of additional cars, buses, industrial vehicles and lorries. Even if the road was widened the access could only be into and from Forest Road, which is maintained and paid for by Kent County Council. The access onto Forest Road with a new resident number of approximately 600 people would cause significant delays and danger to pedestrians. The road south is narrow, for single vehicles only. Golfers use the road to walk, with their golf bags, between the two greens. There is insufficient road or verge width to expand or extend as there is a rail bridge dividing the road. Additional traffic would undoubtedly be a safety issue. 9. The additional volume of vehicles would be unacceptable for the road and again would affect the AONB. In addition to the environment factors many of the houses at the entrance to Benhall Mill Road, from Forest Road, do not have off road parking. As a result there is a high volume parking in the current built up part of that road, together with overflow parking from the new developments on the Crematorium side of the road. This more densely populated area means that due to the high number of parked vehicles only one car can pass. The road is not wide enough for two vehicles to pass at the same time; this would cause significant additional pressure with potentially 300 - 400 additional cars using the road. 10. Access of vehicles in and out of the proposed land would have a significant impact to the dwellings in Tunbridge Wells at the tope of the Benhall Mill Road and the access into and out of the Cemetery and Crematorium. 11. The noise and light which is evident from the Hawkenbury Astro Turf when in use would go some way to demonstrate the impact a development of 220 dwellings (possible 800 people) would have on noise and light. 12. The density of dwellings proposed will not be in keeping with the large dwelling and proportional land at Birch lands, Little Mount Farm, Windmill Farm and Windmill Farmhouse. 13. The land immediately adjacent to Little Mount Farm is owned by the J Edmonton Trust. We believe there may be a restriction to development in any way capacity on the new tree plantation which overlooks Little Mount Farm and edges the railway boundary foliage and trees. The proposed plan does not appear to account for this. 14. This site is urban fringe to Tunbridge Wells and Kent County Council. The residents will naturally look for environmental and social support from within KCC and not Wealden which would suggest this proposal is made by WDC with the sole purpose of offloading the support of dwellings and residents to KCC. This is a ridiculous idea. WDC have many rural villages and town which will face the same impact issues in relation to schooling, medical provision, transport etc. but, if they invest properly improvements in these provisions will be of benefit to neighbouring villages and towns in the future when WDC face similar developmental pressures. 15. Kent County Council requested inclusion
of Social Housing in Ash Close, the development between the Nevill Golf Club and Acer Avenue. This development has been built to allow localised internal recreation areas for children and high brick walls, in line with the enclosed Acer Avenue development. There is no mention of any Social Housing allocation. More allocation of Social Housing together with the issues potential health risks with the land being built on and the railway will undoubtedly have a negative effect on house prices and the lack of medical provision, local shops and public transport will mean the demand for these properties will be poor. The residents in Ash Close find the lack of public transport and local shops very difficult. These properties are not in high demand even within KCC. 16. If the address of these dwellings was Tunbridge Wells; are WDC presuming that social provision within Tunbridge Wells will support this new development and its residents? 17. Developments of 220 dwellings (approx 600 - 800 people) should be allocated for sites within Wealden where WDC are able to provide the social support required by this size of residential community. 18. There is no provision of schooling within Wealden for miles. The nearest Wealden funded primary school is Frant. The site has developmental restraints and if already year in year out over subscribed. The nearest secondary school is Uplands in Wadhurst. There is no public transport from Benhall Mill Road to Wadhurst. The children in Ash Close, who are Kent County Council, are largely allocated Broadwater Down School. There is no transport to that school and many families walk that distance with their children. How would new residents be expected to travel to schools within Wealden? 19. The nearest Doctor's surgery will be in Frant. Has Wealden DC allocated fees for an extension of these medical services offered? The address for these properties will presumably be Tunbridge Wells and therefore WDC are presumably hoping they will not have to provide medical support to these residents. 20. The nearest hospital to the residents would be Pembury, already hugely busy with residents from Kent. If you applied for residential within Uckfield where there is considerable land between the town and the industrial area and which supports a local hospital provision. Crow Junior Colts Rackets champion - borough also has just such a provision. 21. The provision of sewage, mains, water, gas, electricity etc. There are no mains supplies from Wealden so again WDC would presumably be looking for the developers to tap into Kent supplies. There have been significant delays recently on Forest Road as a result of traffic lights being erected whilst essential repair and replacement work has been done.

Details of Changes to be Made:
Details of Reasons for Soundess/ Legal Complaince:

As an Association representing our residents, we don't want to build on green field sites unless absolutely necessary and the infrastructure and the flood planes must be taken into consideration. Since the Polegate bypass has been built, the traffic has quickly got back to being as bad as it was before through our Parish of Willingdon. The upgrading of the A27 to a dual carriageway should be a top priority to ease the congestion at the traffic lights on the A2270 and the A27 but whether this will ever be done in our lifetime remains to be seen. Mornings Mill site is a delicate site because it has a lot of flood plane and we wish to retain Hindsland Playing fields for both Willingdon and Polegate residents to use. It also acts as a good strategic gap between Polegate and Willingdon. The fields behind Hamlands which do flood could be dug out to form a lake to alleviate any flooding problem in Willingdon on the A2270 and also act as a good amenity linking with the Eastbourne Park and the cuckoo Trail and could be an excellent nature reserve. Any houses that might be built would need to be kept to a minimum and built near the railway line with the dirt from the lake acting as a bung which trees could be planted on to protect the view from the Downs. Also the residents could walk to the Railway Station, walk to Polegate to shop and this would help regenerate Polegate. Any access should go over the Railway Line on a flyover and link up with Dittons Road and then on to Jubilee Way via a roundabout where Morgan Est had their yard when they built the by pass. This would alleviate traffic problems on the A2270 which is almost to capacity now, before any extra houses are built. The land that adjoins the A2270 could be used for recreational and amenity use and still allow Willingdon to retain is rural/village appearance. By Mornings Mill Farm entrance there could possibly be a Community Centre/Cottage Hospital to serve the immediate area for minor injuries and outpatients like Uckfield Hospital. We would prefer not to have any extra housing and development in the area and when drawing up a plan you should consider the quality of life of the residents already here and the damage any over development will cause without the appropriate infrastructure in place. There are already many areas that flood and the sewerage and drainage would need considerable improvement as would the health service at a time when it is being suggested departments at our present hospital could well be closed in the not too distant future.

Details of Changes to be Made:
Paragraph 5.7

Details of Reasons for Soundess/ Legal Complaince:

Whilst it is outlined in paragraph 5.7 of the Core Strategy that the number of opportunities to utilise previous developed sites within Wealden is likely to diminish in comparison to previous rates and that there will be a legitimate role for urban expansion at principal settlements, we support the continued use and preference for previously developed land in accordance with national policy contained within PPS3: Housing, in particular paragraphs 10 and 40, both of which encourage Local Planning Authorities to make efficient use of land by re-using previously developed land. The importance of the continued use of previously developed land is outlined in PPS1: Delivering Sustainable Development. Paragraph 21 states that in order to utilise resources in an efficient and sustainable way "The broad aim should be to ensure that outputs are maximised whilst resources used are." Criteria (viii) of paragraph 27 further states that in preparing development plans, planning authorities should seek to "Promote the more efficient use of land through higher density, mixed use development and the use of suitably located previously developed land and buildings. Planning should seek actively to bring vacant and underused previously developed land and buildings back into beneficial use to achieve the targets the Government has set for development on previously developed land." The redevelopment of the Former Merrydown Cider site within the Local Service Centre of Horam as a mixed use scheme will assist the Authority in meeting the objectives in national planning policy and can deliver at least 70% of Horam's housing requirement (100 units), as outlined in representations to Strategic Policy WCS6 - Rural Area Strategy, on Brownfield land.

Details of Changes to be Made:

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Paragraph 5.7

Details of Reasons for Soundess/ Legal Complaince:

The strategy aims to increase the economic, environmental and social well-being of the District. This will not be achieved by the policy as proposed. The siting of new housing on greenfield land means the permanent destruction of our precious and dwindling agricultural land, increasing carbon footprint, deceasing our food security, degrading the environment and destroying wildlife. In contrast there is no provision for the development of low-impact agricultural smallholdings, which would greatly benefit the economy, environment and social structure of the District. The national target of 60% brownfield land for development is proposed to be broken by the Strategy.

Details of Changes to be Made:

The national target of 60% of housing development or more on brownfield sites should be adhered to or exceeded. Housing developments in town centres using existing closed-down retail premises should be proposed and actively encouraged by the Strategy. The Strategy should include provision for allowing the development of "Low Impact Agricultural Smallholdings", including a dwelling, on existing agricultural land on plots of over 5 acres, with certain restrictions, most importantly: 1. Total floor area of buildings not to exceed a set amount; 2. the use of the land must remain agricultural, 3. The dwelling must be carbon-neutral.
Summary of all Representations - Proposed Submission Core Strategy Regulation 27 - Report 11th July 2011

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Paragraph 5.7

Sound: Yes, No, Justified, Effective, Consistent with national policy

Legally Compliant: Yes, No

Details of Reasons for Soundness/ Legal Complaince:

I have examined the Proposed Submission Core Strategy (PSCS) against the Soundness Tool and found it wanting in terms of justification and effectiveness. The PSCS is a carefully prepared document, well thought out to offer a plan for the future but it does not take full account of the background research and documentation upon which it is based. In particular the proposals to expand Hailsham to the north do not comply with the sustainability or infrastructure objectives for Wealden and the proposals for development to the east and north of Hailsham are contrary to previous WDC research and to current Background Papers. Participation The consultation process has permitted all interested parties to engage but the options for answering have been strictly limited on a Yes or No basis when, in fact, more discursive answers are needed. Research/Fact Finding The content of the PSCS is not justified by the evidence, particularly in respect of infrastructure and especially highways and sewerage. Document No 7 Infrastructure Position Statement dated July 2009 refers under (A) Transport to the need to reduce travel distances. The PSCS shows strategic development to North and East Hailsham and towards Hellingly at distances from the town centre of up to 2.2 km. The South Wealden & Eastbourne Transport Study (SWETS) in paragraph 3.29 makes it clear that development for major housing allocations in north and east Hailsham would cause significant traffic pressure. Fewer pinch points and reduced traffic pressure are shown for development south of Hailsham. BP No 11 Infrastructure Delivery Plan defines the highways issue for development to the north and east as ‘CRITICAL’ and states ‘Development is contingent on delivery of this infrastructure’. Regarding sewerage/waste water capacity, as outlined in BP No 11, Hailsham North wastewater works had a consented discharge capacity at 1st Jan 2007 at 2900 dwellings. Hailsham South wastewater works had a capacity of 2400 dwellings at same date. This same document shows infrastructure developments in the Appendix for the North water treatment works is deemed CRITICAL to deliver 1500 dwellings. In the south of Hailsham ‘A scheme is not necessary to deliver the proposed Submission Core Strategy. However a scheme may be required for windfalls of housing and employment development.’ The same Background Paper states under ‘Further Supporting Evidence’: ‘Infrastructure is not necessary to achieve the full allocation of development in Hailsham, Polegate and Stone Cross as shown in the proposed Submission Core Strategy.’ This reliance on ‘massing’ in the north of Hailsham therefore has infrastructure issues which could be avoided by reducing the size of the Strategic Development Areas and spreading the housing to the south of the town. According to the Housing Needs Assessment the greatest number of low income families are located to the south and such development would help to balance with Affordable and mixed housing. The Table at the end of BP 11 sets out water treatment for extant Planning Permissions and completions from April 2006-April 2010 and states that there are capacity issues arising in the north from the Spatial Strategy but not in the south. The Conclusions to BP 11 state that wastewater funding has been secured from Offwat for works in 2012 to increase capacity in the Hailsham area and to undertake a study to investigate other technical solutions. The financial solution would be via appropriate developer contributions. In summary, therefore, according to BP11 there are no capacity issues in South Hailsham providing development is not beyond 2400 houses, less 885 already approved – namely 1515 dwellings in Polegate, , Stonecross and South Hailsham. The Oaklands/Brickfield SHLAA site 100/1310 (224 dwellings) includes an East Sussex County Council approved road scheme to allow capacity for up to 300 dwellings. Landscape In January 2001 WDC prepared the ‘Low Weald Towns Sector Appraisal Landscape’ as part of the Background Papers for the then Local Plan Review. This document is partly incorporated in Background Paper No 6 Green Infrastructure. BP 6 does not include the following relevant paragraph about the landscape around Hailsham: ‘South of Hailsham: …Urban Influence: On the western side of the sector the urban edge of Hailsham is generally well concealed by woodland often in deep ghylls or valleys. Scattered farms and houses are linked by a network of roads and lanes, the latter often sunk between high overgrown hedges. Horse grazing is common, a reflection of urban pressures, and as a result many of the pastures have the unkempt rather untidy appearance of paddocks. Rough sheds, water troughs and other paraphernalia are common place. …’ Under the heading ‘Sensitivity to Development’ the Landscape Appraisal states: ‘The relatively open aspect of the landscape east of the Cuckmere flood plain makes it sensitive to change by new development and any large scale expansion of the built form beyond the existing urban edge of Hailsham in this location would tend to damage the rural setting of the town. ... ‘ However there is very little scope for additional development on the western edge of the sector without threatening the intrinsic qualities of the landscape and more particularly the rural settings of Hellingly and Horselunges Manor. Importantly the urban influence of Hailsham is hardly noticeable in this reach of the Cuckmere valley apart from some ribbon development along the A271 on the immediate fringes of the town. Any significant expansion of the built form in this location (Hellingly/North Hailsham) would be likely to erode the historic landscape, structure and rural
character of this valuable landscape and irreparably damage the vulnerable gap of countryside between Hailsham and Hellingly.' The Sustainability Appraisal sets out on p 42 the Sustainability Objectives for Wealden. The environmental objectives include: 7. ‘To make the most efficient use of land by prioritising brownfield sites for development, the re-use of existing buildings and promoting higher development densities.’ 11. ‘To conserve, enhance and make accessible for enjoyment the District’s countryside (in particular protecting the best and most versatile agricultural land) landscape, historic and built environment.’ 12. ‘Reduce the need to travel by car and promote alternative methods of transport.’ Development north and east of Hailsham is contrary to all or most of these objectives because it would increase travel distance, increase reliance on motor cars and damage the landscape and countryside, being on greenfield sites. SHLAA site 100/1310 Oaklands & The Brickfield are on a previously developed site, the Brickfield being defined as ‘Brownfield’. Oaklands, being used for business ‘horse culture’ and not agriculture is also classified as ‘brownfield/previously developed’ under PPS3. Development of these sites south of Hailsham therefore complies with the environmental objectives set out in the Sustainability Appraisal. Alternatives The Council’s chosen approach in the PSCS is therefore not the most appropriate given the reasonable alternatives and it goes against the Background Papers and existing evidence base. It would appear from the PSCS that sustainability considerations have not informed its content from the start. In particular, it is stated at Para 6.30 of the PSCS that the Polegate, Willingdon, Stonecross development of 700 dwellings can only take place when formal road infrastructure is in position. Therefore SD4 is not programmed to start until 2019/20. Similarly, Para 5.16 states that the proposed northern urban extension of Hailsham (SD2 & SD3) cannot occur without infrastructure improvements namely sewerage and roads. Hence SD2 cannot start until 2017 and SD3 until 2021. I would submit that this issue of roads indicates that, by definition, the Strategic Development Areas forming the northern extension of Hailsham towards Hellingly and those in Polegate, Willingdon and Stone cross are unsustainable. The PSCS was initially prepared in its Draft and Consultation forms on the basis of the requirements of the South East Plan. This is now being abandoned and will no longer be valid. Because the Draft Core Strategies and most of the evidence gathering and Background Papers were prepared in accordance with the South East Regional Plan, the current PSCS is probably invalid and I would submit that the Inspector should examine this. Delivery The Council has correctly identified the main issues that the PSCS is seeking to address but does not present a clear vision for Wealden District into the future, only the equivalent of a ‘wish list’ of construction of 400 houses a year and sufficient commercial development for employment. It does not clarify how to achieve this, particularly in respect of infrastructure. The major strategic development north and east of Hailsham introduce an unacceptable risk in the ability to provide the infrastructure. Cross boundary issues have not been adequately addressed. In particular with Mid Sussex District Council and associated County Council Highways liaison for a relief road around East Grinstead. Nor does it address the problems of coalescence between Polegate, Willingdon and Stonecross and Eastbourne Councils, nor does it address the cross boundary issues which will arise with Lewes District Council, particularly in connection with development around Uckfield. The PSCS sets out objectives in terms of construction and development but does not connect these in sufficient detail with the necessary infrastructure. The most obvious gap in the policies is related to transport, in that the entire PSCS is predicated on continued and developing use of motor vehicles, there being no positive action proposed in relation to the Uckfield-Lewes Railway line and only passing mention of the possibility of public transport or reinstated railway from Hailsham southwards to Polegate and Eastbourne. The timescales given in the Plan are governed by the moribund South East Plan and are not realistic, particularly in respect of infrastructure provision and especially given the proposals in the PSCS for development north of Hailsham which will rely on the motor car. This is contrary to Spatial Planning Objective 7. Currently the Strategic Development Areas SD2, SD3, SD4, SD6 & SD7 are all undeliverable as set out in Paras 3.16, 6.19 & 6.31 due to lack of existing highways infrastructure. This amounts to 2650 dwellings which cannot be delivered. Flexibility It is not clear whether the PSCS will be flexible enough to respond to a variety of, or unexpected changes in, circumstances, whether environmental, political or economic. Currently there is no clear plan for updating it. It cannot be very flexible because of the infrastructure constraints in Wealden District. Summary The PSCS does not explain how its key policy objectives will be achieved because it is based on the South East Plan which is being abolished. Most of the supporting documents are also based around the South East Plan and pre-date its abolition. The proposals for Strategic Development housing north and east of Hailsham and in Polegate, Willingdon & Stonecross are all undeliverable because of lack of highways infrastructure and, in the north, due to lack of sewerage capacity. These proposals therefore contradict Wealden’s own sustainability and environmental objectives. The PSCS does not take proper account of some sites in the SHLAA which are recognised as suitable and which meet sustainability objectives better than those selected for ‘Strategic Development’. The Oaklands and Brickfield site south of Hailsham (SHLAA 100/1300; 224 dwellings) is largely on previously-developed (brownfield) land and has a highways scheme for the Ersham Road roundabout agreed with East Sussex County Council and should be included in the SDAs to the exclusion of less suitable development. It meets the Hailsham Sustainability Objectives, being a local Urban Extension within walking distance of Hailsham town centre and offering proximity to open space, woodland and biodiversity – at a scale capable of delivering up to 224 dwellings with minimum impact on infrastructure and environmental amenity. This PSCS has given careful consideration to the issues within the Wealden area but falls short of achieving deliverability because of a decision to favour massing over locality, with all the consequent risks involved in reliance on a minimum number of SDAs and with an intention to release more greenfield sites than is compliant with government recommendations. I welcome the Review and monitoring procedures inherent in the PSCS but this document is currently unsound.
Details of Changes to be Made:
It is not in accordance with Government or Council policy to develop greenfield sites in preference to brownfield sites. Currently much of the north and east Strategic Development proposed for Hailsham is on greenfield sites whereas brownfield sites which would form urban extension on the south side of the town have not been included. Sites such as Oaklands & The Brickfield (SHLAA site 100/1310) can help meet Government targets.

Representation ID
5
Person ID  MR  HUTCHISON
316236

Sound  ☑ Yes  ☐ No  ☐ Justified  ☐ Effective  ☐ Consistent with national policy
Legally Compliant  ☑ Yes  ☐ No

Details of Reasons for Soundess/ Legal Complaince:

Details of Changes to be Made:
1. The Core Strategy is not legally compliant and is unsound because of its proposals for an urban extension to the north west of Heathfield (Strategic Development Area SD11). 2. Whilst the principle of accommodating housing growth in the broad location of north west Heathfield is supported, the Core Strategy’s proposals are deficient because they: (a) fail to take a comprehensive approach to the development of this area and so are not founded on a robust and credible evidence base and are not the most appropriate strategy when considered against the reasonable alternatives in this location, thus failing the soundness test in paragraph 4.36 of PPS12 that they are “justifiable”. (b) constitute an unjustified encroachment into the High Weald AONB and so are not the most appropriate strategy when considered against the reasonable alternatives in this location, thus failing the same “justifiable” test in PPS12 and also the soundness test in paragraph 4.52 of PPS12 that they are “consistent with national policy”. Paragraph 16(v) of PPS7 requires the Council in preparing the Core Strategy to “conserve…sites of landscape…value, in accordance with statutory designations”. Paragraph 22(ii) of PPS7 requires that “major developments” should only take place within the AONB after “the most rigorous examination” and an assessment of “the scope for developing elsewhere outside the designated area or meeting the need for it in some other way”. The Council has failed to properly assess the scope for meeting the need for development on previously developed land at north west Heathfield that is not in the AONB. (c) utilise less accessible and less sustainable land and so are not the most appropriate strategy when considered against reasonable alternatives in this location, thus failing the same “justifiable” test in PPS12. (d) fail to provide adequate safeguarding of amenities of existing dwellings (if those dwellings are to be excluded from the urban extension as currently proposed) and fail to integrate into the existing urban form, thus failing the soundness test in paragraph 4.52 of PPS12 that the proposals are consistent with national policy. Paragraph 34 of PPS1 and paragraph 13 of PPS3 require the Council to reject design which is “inappropriate in its context” and paragraph 35 of PPS1 requires development to be designed so that it will be “integrated into the existing urban form and the natural and built environments”. THE PROPOSED SUBMISSION CORE STRATEGY 3. We object to the following parts of the Core Strategy. Because the objections are interconnected, we have set out all the relevant matters in this response, although this particular objection only relates to the specific part of the Core Strategy identified in our response to Q1 above. Our objections are as follows: (i) The omission from Spatial Planning Objective SPO1 of any reference to minimising the loss of nationally designated landscapes, including the High Weald AONB. Paragraph 16(v) of PPS7 requires the Council to conserve the AONB and since it is clear that the Council is proposing to meet part of the District’s development needs by using land within the AONB, the Council should establish a clear objective that only the minimum AONB land should be used for this purpose and wherever possible non-AONB land should be used in preference. (ii) The reference in Policy WCS2 to the broad locations for housing development being shown as insets on the Key Diagram. We object to the inset for Heathfield in relation to the way it shows the proposal SD11 and consequently object to this reference to that inset plan in Policy WCS2. (iii) The reference in Policy WCS4 to SD11: Land at North West of Heathfield. We object to the way that SD11 is described in Chapter 6 of the Core Strategy and shown on the Key Diagram and as a result object to the reference to SD11 in Policy WCS4. (iv) The omission from paragraph 5.8 of any aim to maximise the use of previously developed land in meeting existing and future housing needs. Notwithstanding the recent changes to PPS3 it remains a national objective to prioritise the use of previously developed land, in accordance with paragraph 21 of PPS1 and paragraph 40 of PPS3. (v) The reference in paragraph 6.40 to the identification of potential sites for housing “through the SHLAA”. We object to the inclusion of Site 155/1210 in its current form as shown in the SHLAA and consequently object to this reference to that site in paragraph 6.40. (vi) The reference in paragraph 6.41 to the “most suitable location” being “within the AONB” and that this land could be developed “without strategic adverse impact on the landscape”. The Council’s evidence base does not demonstrate that the land within the AONB is more suitable for development than the non-AONB previously developed land on High Street. There is no assessment by the Council of the suitability of this non-AONB land (which includes the objector’s land at Lavender Cottage, High Street, Heathfield, TN21 0UP) and yet it is more suitable than the AONB land, being (i) not subject to a national landscape designation, (ii) previously developed land, (iii) within the existing settlement boundary, and (iv) well related and integrated into the urban area and existing transport connections. In addition, the Council’s evidence base does not show that 160 dwellings can be provided in the AONB without strategic adverse impact on the landscape. The capacity of 160 dwellings for SD11 would appear to derive from the assumed capacity of 2 adjacent SHLAA sites at north west Heathfield (Site 155/1210 with a capacity of 123 dwellings at 40 dph and Site 307/1210 with a capacity of 35 dwellings at 35 dph). The Council’s Landscape Character Assessment (February 2009) shows at Figure 5 that large parts of these...
SHLAA sites are required to be retained as open space to provide a “landscape buffer” to Tilsmore Wood. If those buffers are to be provided as recommended in the Landscape Character Assessment, the SHLAA sites will not be able to deliver the required capacity, without radical changes to the assumed density, and there has been no assessment of the impact of higher density development on the AONB and on the landscape setting and character of Tilsmore Wood. The claim therefore that SD11 can be achieved without strategic adverse impact on the AONB is not supported by the evidence base. (vii) The reference in paragraph 6.41 to the release of AONB land being justified “as no suitable alternative non-AONB location exists”. The Council’s evidence base does not substantiate this assertion. The Council has not assessed the suitability of the non-AONB land in this location which fronts High Street (including the objectors’ land at Lavender Cottage). This non-AONB land is within the settlement limits of Heathfield as identified on the Proposals Map of the saved Local Plan and paragraph 6.48 of the Core Strategy confirms that within development boundaries “the principle of development is acceptable”. The principle of redeveloping this land to provide more intensive residential development has already been accepted by the Council, with the grant of planning permissions at Brackenside (WD/08/0329) for 3 dwellings in place of 1 dwelling, and at Oaksdown/Lowlands (WD/2011/0400) for 9 apartments in the place of 2 dwellings. The more intensive development of the non-AONB land on the High Street frontage would minimise (or may even remove) the need for the use of AONB land. This option would plainly be a more suitable alternative than the use only of land “within the AONB” as proposed in the Core Strategy. (viii) The reference in paragraph 6.41 to “no suitable alternative contingency land is available”. The land at Oaksdown/Lowlands is available for development (as confirmed by the recent renewal of planning permission). The objectors’ land at Lavender Cottage is available for development (and this has been made known to the Council since at least August 2010). The land at Woodhatch is relied on as being available for development in order to provide the access for SHLAA site 155/1210. The objectors understand that the land at Holmhurst could be made available for development. Thus, there is a continuous frontage of 5 plots of non-AONB land available (all with generous areas of garden land, most of which is excluded from the AONB) just on this part of the High Street. Were the Council to actively promote a comprehensive redevelopment of this area it is likely that other land in the vicinity would be made available. However, the Council has simply failed in its evidence base to assess this option. If it is necessary to identify contingency land then the hinterland of AONB land should be identified as contingency land, with priority being given to the development of the non-AONB land on the High Street frontage. Prioritising that land would be consistent with the policy objectives of minimising the loss of AONB land and maximising the use of previously developed land. (ix) The reference in paragraph 6.42 item 3 to SD11 being “on land adjacent to the urban area”. The proposal for SD11 should not be defined in a way which excludes the urban area and which focuses only on land within the AONB. The proposal should embrace the urban area and the development should maximise the use of previously developed land in the urban area to achieve the provision of 160 dwellings before any consideration is given to the use of land in the AONB. (x) Figure 10 Heathfield Area Strategy. This diagram shows SD11 as located within the AONB and beyond the existing settlement. The diagram should not exclude the inclusion of the existing built up area in this location within the scope of SD11. The built up area has the potential and the capacity to be redeveloped and this aim should be the first priority at north west Heathfield. (xi) Key Diagram: the inset for Heathfield. The inset shows Heathfield and Proposal SD11 in the same way that they are shown on Figure 10 and they are not acceptable for the same reason set out at (x) above. 4. We now propose to elaborate on these objections. Piecemeal not comprehensive 5. SD11 takes an opportunistic approach. It utilises substantial areas of greenfield land as the main development areas (and by implication from the SHLAA one existing property simply as a means of access). Although the SHLAA indicates that Site 155/1210 is in multiple ownerships and Site 307/1210 is owned by a company with 7 shareholders, the choice of this location seems to be influenced simply by the fact that these 2 sites were promoted in the SHLAA and so it is assumed they are available. Site 155/1210 is said to be under the control of a housing developer. We are not aware whether the Council has seen the terms of any option or other legal agreement giving such control but, given that the Proposed Submission Core Strategy is a long term strategy to 2030 and its trajectory does not anticipate the site coming forward before 2015/16, little weight can be given to the status of any current contractual arrangements. 6. Any sensible spatial planning approach to the development of this area would not look at the sites promoted in the SHLAA in isolation but would look to see how that development would relate to its local context and how it would relate to the settlement it is intended to form a part of. 7. The site of SD11 is on sloping ground set back behind existing development which separates the site from the rest of Heathfield. Development as proposed will not integrate the development with its local context as required by paragraph 35 of PPS1. Nor will it maximise the opportunities for the site to benefit from clear and easy links to the facilities in the local service centre by non-car modes. 8. A comprehensive approach would look at the whole of the area in this north western part of Heathfield and then seek to identify the land which is most suited to development. It is common sense that this would start by looking at the land with the best links by foot, cycle, and public transport to the rest of the settlement. That is of course the frontage land along Heathfield Road/High Street itself. The frontage land also contains the previously developed land comprising the existing dwellings and their various outbuildings. Whilst the recent revisions to PPS3 have removed garden land from the definition of previously developed land, the footprint of the buildings and their associated driveways and hardstandings clearly have a higher priority for development than a greenfield meadow. 9. The present objectors, as the owners of Lavender Cottage, are willing to make their land available as part of a wider development. The objectors have made this known to the Council since at least August 2010. The principle of redevelopment for more intensive residential development has already been established on land to the wets (WD/08/0329) and on the adjoining site
to the east of Lavender Cottage (WD/2011/0400). Although planning permission was granted for a block of flats (WD/2008/0276), that development has not come forward and the permission has recently had to be renewed. Clearly, the land is available for development, even if the form of development is not at present attractive to the market. We understand that the owner of the adjoining plot at Holmhurst would be prepared to make that site available. Woodhatch is relied on as available in the SHLAA (Site 155/1210 refers). Thus there is already a substantial amount of the frontage land which is available for development. A spatial approach to the planning of this area would look to utilise this developed frontage land, which plainly has development potential, before turning to the undeveloped hinterland to the rear. Unjustified Encroachment into the AONB 10. The Proposed Submission Core Strategy recognises that SD11 lies within the AONB, where there is strict control over new development. Paragraph 22 of PPS7 is clear that major development in the AONB requires “the most rigorous examination” and that such development should only be accepted after assessment of the scope for meeting the need elsewhere. Under the GDMO 2010 “major development” is a development of 10 or more dwellings. Under the Secretary of State’s arrangements for the recovery of appeals on the basis that they are large/controversial, the threshold is 150 residential units. On either basis, a development of 160 dwellings is major development. In any event, the Council has accepted in the SHLAA that “there is a requirement to demonstrate development is essential to meet local needs and that other more suitable sites do not exist elsewhere” (Site 155/1210). The claimed rationale for the use of AONB land in this case is that “no suitable alternative non-AONB location exists”. This is patently incorrect. As already noted, the frontage land is not within the AONB and if the desire is to achieve a development of some 160 dwellings there can be no justification for taking more AONB land than is absolutely necessary when there is non-AONB land in the same location which is available. 11. Whilst it may be doubtful that the frontage land which is known to be available could alone accommodate the full scale of the development sought, the need to encroach into the AONB would be very much reduced if the frontage land was used first. Such an approach would also enable the lower (and least accessible) parts of the meadow to be retained as open land, potentially providing a better buffer with the important woodland at Tilsmore Wood that makes up such a key component of the Wealden character. The need for such a buffer is recognised in the Landscape Character Assessment (Figure 5). In addition, if the Council made it clear that it was promoting the comprehensive development of the area, it is likely that other owners would also wish to make their land available, and the Council may therefore be able to avoid encroaching into the AONB to any material degree. 12. The Council’s claim that 160 dwellings can be provided in the AONB without strategic adverse impact on the landscape is not supported by the evidence base. The capacity of 160 dwellings for SD11 would appear to derive from the assumed capacity of the 2 adjacent SHLAA sites: Site 155/1210 and Site 307/1210. As already noted, the Council’s Landscape Character Assessment shows (Figure 5) that large parts of these SHLAA sites are required to be retained as open space to provide a “landscape buffer” to Tilsmore Wood. If those buffers are to be provided as recommended in the Landscape Character Assessment, the SHLAA sites will not be able to deliver the required capacity, without radical changes to the assumed density, and there has been no assessment of the impact of higher density development on the AONB and on the landscape setting and character of Tilsmore Wood. The claim therefore that SD11 can be achieved without strategic adverse impact on the AONB is not supported by the evidence base. Using Less Accessible and Less Sustainable Land 13. Similar considerations in terms of minimising the amount of AONB land apply in relation to accessibility issues. The lower parts of the sloping meadow land are not only more remote by simple distance from the footways and bus route along Heathfield Road/High Street, there is also the fact that journeys from home will inevitably be uphill for residents of that area. There will therefore be a disinclination to use non-car modes for accessing local services, even if they might appear to be within walking distance. It must also be doubted whether much of the hinterland is within the preferred 400m distance for access to a bus route. In contrast, the frontage development is already connected to existing pedestrian routes by the adjacent footways and there is only a shallow fall in the land closest to the roadside. Accessibility to the bus route is also much improved. 15. Again, on any sensible measure of accessibility and sustainability, it cannot make sense to use the more remote hinterland in preference to the frontage land. PPS1 is clear at paragraph 35 that new development needs to be integrated into the urban area and address connectivity issues. The choice of a backland location for SD11 when the more accessible frontage land is available is directly contrary to this guidance Inadequate safeguarding of amenities 16. We have already explained why a comprehensive approach needs to be taken to this area. However, if the Council persists in its piecemeal approach then it is apparent that inadequate consideration has been given to the relationship between the retained frontage properties and the new development to the rear. The existing development is at a very low density and has the established character of a mature residential area, with individual dwellings in spacious plots. 17. The SHLAA indicates a proposed density for the new development of some 40 dwellings per hectare for Site 155/120. This will be substantially different in character and could only be achieved by ensuring a substantial buffer between the 2 very different forms of development. However, this would push the new development further into the AONB and would further separate the new development from the settlement of which it is intended to form a part. Again, there would be a conflict with the advice in PPS1 on integrating the development with the urban area. Soundness Tests 18. It is clear from the objections set out above that the proposals for SD11 are not founded on a robust and credible evidence base, cannot be shown to be the most appropriate strategy when considered against the reasonable alternatives, and are not consistent with national policy in PPS1, PPS3, and PPS7 in several important respects. They therefore fail 2 of the key tests of soundness as set out at paragraph 4.52 of PPS12. Legal Tests 19. These objections also have the consequence that the Council’s failure to properly consider reasonable alternatives to its proposals at
north west Heathfield, and in particular to consider the alternative of an area of growth in this location planned on a comprehensive basis and focused on maximising the use of previously developed land and minimising the use of land within the AONB, has the consequence that the Sustainability Appraisal/Strategic Environmental Assessment that accompanies the Core Strategy is legally deficient and the Core Strategy is consequently not legally compliant with the requirements of either Regulation 5(1) of the Environmental Assessment of Plans and Programmes Regulations 2004 or with the requirements of s.19(5) and s.20(2) Planning & Compulsory Purchase Act 2004. In addition, the same failings, together with the lack of a credible and robust evidence base to support those proposals and the conflicts with national policy mean that the Core Strategy is not “sound” as required by s.20(5)(b) PCPA 2004.

20. The SA/SEA considers, in broad terms, alternative locations for growth at Heathfield as between the north east, north west, and west of the town. However, what it fails to do is to look at reasonable alternatives within the selected north west location. It is no answer for the Council to suggest that this level of detail is a matter for a later DPD because the Core Strategy is already spatially specific that the location of north west Heathfield is an “urban extension” (i.e. an addition) and that it is “within the AONB” (i.e. outside the settlement boundary. The same spatial approach is shown on Figure 10 and on the Inset for the Key Diagram. The Council is not, therefore, able to avoid grappling with the spatial implications of this choice as part of the Core Strategy and testing it against reasonable alternatives. However, it is clear that this is not an exercise that has been attempted in the SA/SEA.

21. The Council will be well aware from the recent decision in Save Historic Newmarket Ltd v Forest Heath District Council [2011] EWHC 606 (Admin) that a failure in the SA/SEA to give proper consideration to identification and assessment of reasonable alternatives is likely to result in a quashing of the relevant parts of the Core Strategy. Conclusion 22. For all of these reasons the objectors strongly suggest that neither the Council nor the Inspector should endorse the present proposals for SD11. What is required is a fundamental rethink to achieve an integrated, sustainable and accessible development which minimises the impact on the AONB and provides a comprehensive spatial approach to the development of this area. Essentially this requires the focus to shift from the “easy target” of greenfield meadows to a more considered approach, giving priority to the previously developed frontage land, and only considering the AONB hinterland to the minimum extent necessary to achieve the required dwelling numbers.

Details of Changes to be Made:
Add to paragraph 5.8 the words “We will, nonetheless, maximise the use of brownfield land and will minimise the use of greenfield land, with brownfield opportunities having priority in meeting needs.”

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Details of Reasons for Soundess/ Legal Complaince:
2. Paragraph 5.9 confirms that housing figures set out in Policy WCS2 make no provision for windfall sites, but completions on windfall sites will count towards the overall house building totals achieved in Wealden. However, it should be clarified that these will be additional to the housing figures referred to in Policy WCS2. In this regard the wording of paragraph 5.17 is unclear and seems to potentially contradict Policy WCS2. In view of the higher housing allocation in the South East Plan, there is no justification for windfall sites to be counted against the total 9,600 housing figure.

Details of Changes to be Made:
Summary of all Representations - Proposed Submission Core Strategy Regulation 27 - Report 11th July 2011

Representation ID 1420
Person ID 104179
Agent ID 339545

Paragraph 5.9
Sound ☐ Yes ☑ No ☐ Justified ☐ Effective ☑ Consistent with national policy
Legally Compliant ☑ Yes ☐ No

Details of Reasons for Soundess/ Legal Complaince:

i) Spatial Strategy Policies a) Policy WCS1: Provisions of Homes and Jobs 2006-2030 – COMMENT/OBJECT 2.7 Paragraph 3.22 of BP1: Development of the Proposed Submission Core Strategy demonstrates the quantum of development identified in the plan period has resulted from ‘local needs and tested against capacities and constraints’ and demonstrates that a reduction from the South East Plan figure of 11,000 dwellings to 9,600 dwellings is appropriate. Sections 5 to 8 of BP1: Development of the Proposed Submission Core Strategy detail the justification for this approach and are expressed in the CS in paragraphs 3.8 – 3.17. 2.8 However, whilst the basis for proposed Policy WCS1 has been detailed within the Evidence Base and therefore could be considered ‘sound’ in this respect, it has not had due regard to the South East Plan, which still forms part of the Development Plan. PPS12 identifies under Para 4.50, that as a legal requirement ‘the plan conforms generally to the Regional Spatial Strategy’. 2.9 Notwithstanding the proposed intention to revoke the RSS and ‘emerging’ guidance contained within the ‘Localism Bill’, it is clear, that at this moment in time, the Core Strategy should have due regard to the requirements of the South East Plan, including the annual housing requirement from 2006 – 2010.

2.10 The overall housing requirement for Wealden as set out in the SEP (2006 – 2026) is 11,000 dwellings, which equates to 550 dwellings per annum over the 20 year plan period. Appendix 9 (p75) of BP2: Managing the Delivery of Housing, identifies that since 2006, a total of 1,332 dwellings have been completed in the District. 2.11 Table 1 below, demonstrates that against the SEP requirement since 2006, there has been ongoing failure to meet the housing requirement resulting in a current shortfall of 869 dwellings. Nevertheless, in seeking to reduce the overall housing requirement through locally derived evidence (to 9,600 dwellings), and increasing the plan period to 24 yrs (2006 to 2030) to provide an annual requirement of 400 dwellings per annum, it is evident WDC is still unable to deliver the proposed new housing requirement. Table 1 below demonstrates that even backdating the proposed Core Strategy figures to 2006, there is a current shortfall of 268 dwellings. Table 1: WDC Completions since 2006 vs SEP Requirement vs Proposed CS Requirement Year Actual Completions SEP Requirement(Surplus or Deficit)

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<th>SEP Requirement(Surplus or Deficit)</th>
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<td>230</td>
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<td>2007/08</td>
<td>415 (135) 400 (+ 15)</td>
<td>2008/09 350 550 (- 200) 400 (- 50) 2009/10 337 550 (- 213) 400 (- 63) Total 1332</td>
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| 2008/09    | 2,200 (- 868) 1,600 (- 268) | 2.12 It is therefore considered, that in order to promote the delivery of housing to meet the actual local requirement as set out in the CS (9,600 dwellings), or the SEP requirement (11,000 dwellings), it is essential the CS facilitates the delivery of housing and does not seek to artificially maintain the delivery of 400 dwellings per annum or constrain the natural delivery within the District. 2.13 We have concerns with regards to WDC’s approach to windfall sites and the attempt to rely on these sites (when calculating completions) to prevent ‘over-provision’ as set out in paragraphs 10.34 – 10.36 of BP2: Managing the Delivery of Housing. 2.14 Whilst we support WDC’s approach that windfall development should not be used to project delivery (as required by PPS3), we do not consider that monitoring the delivery of high levels of windfall completions should be used as an argument to ‘slow down’ the phases of allocated greenfield sites, as suggested in the Background Evidence and not fully explained within the Core Strategy. 2.15 This ‘preventative approach to delivery’ is at odds with the recent ‘Planning for Growth’ Ministerial Statement from Gregg Clarke MP on 23 March 2011. The statement clearly sets out the Government’s intentions for growth and reinforces the commitment to introduce ‘a strong presumption in favour of sustainable development’. The statement sets out ‘The planning system has a key role to play in this, by ensuring that the sustainable development needed to support economic growth is able to proceed as easily as possible’. The statement continues that ‘Governments clear expectation is that the answer to development and growth should, wherever possible be ‘yes’, except where this would compromise the key sustainable development principles set out in national planning policy’. 2.16 In reviewing paragraphs 10.34 – 10.36 of BP2: Managing the Delivery of Housing, we are concerned that ‘unplanned’ windfall sites could take precedence over the delivery of allocated sites (and associated infrastructure), if these windfall sites are delivered in significant quantities (as historically demonstrated within Appendix 9 of BP2: Managing the Delivery of Housing). This is at odds with the Ministerial Statement which calls for ‘local planning authorities to plan positively for new development.’ 2.17 Furthermore, para 10.34 of BP2: Managing the Delivery of Housing, refers to the provisions of PPS3 and that there may be no need for ‘specific management actions’ when assessed against the delivery trajectory and an acceptable 10%-20% range. However, it is clear that the principles of the ‘Plan, Monitor, Manage’ approach as set out in paragraphs 62 – 67 of PPS3, are predicated on the basis of reacting to any ‘under-provision’ and are not intended to respond to ‘over-provision’. WDC are incorrectly applying the ‘Implementation Strategy’ Guidance contained within PPS3 in the context of ‘over-provision’. 2.18 We therefore seek clarity over the intention of the content of paragraph 5.9 (extract below) of the CS where it identifies that ‘windfalls will be used as part of the
Summary of all Representations - Proposed Submission Core Strategy Regulation 27 - Report 11th July 2011

manage and monitor system, and provide some limited contingency. ‘5.9 Strategic Policy WCS2 makes no allowance for windfall sites. However over the past 10yrs around 200 dwellings per annum have been provided as windfall. Whilst the projected provision of such sites cannot be included at this stage in land supply projections, completions on these sorts of sites will count towards the overall house building totals achieved in Wealden. Windfalls will be used as part of the manage and monitor system, and provide some limited contingency. However, windfall sites can increase the demands of the District’s environmental and infrastructure constraints, and this in turn could have a determining effect on overall delivery capacity at any particular settlement. Through monitoring arrangements the Council will need to ensure that the unplanned development of windfall sites does not conflict with the strategy,’ 2.19 We seek clarity on what this ‘limited contingency’ represents, especially in the light of content of paragraphs 10.34 – 10.36 of BP2: Managing the Delivery of Housing and how the delivery of allocated sites will be reviewed in the context of windfall provision. We have noted the content of paragraph 5.17 of the CS which states: ‘5.17 The Council will, through its implementation and delivery framework and monitoring arrangements, ensure that delivery of its strategy and the overall provision of appropriate levels of growth is not prejudiced by windfalls. Further details of the management and phasing of delivery is constrained within out Background Paper 2: Managing the Delivery of Housing.’ 2.20 We therefore consider that the Background Evidence does not appear to support or relate to the content of the Core Strategy. If the approach as set out in paragraph 5.17 is the case, then why does the Background Evidence (para 10.34 – 10.36 of BP2: Managing the Delivery of Housing), or the Core Strategy (paragraphs 5.9, 5.17 and Policy WCS5 Managing the Release of Housing Land) need to have regard to the issue of ‘over-provision’ and the ‘re-phasing of sites’?

Details of Changes to be made:

ii) Spatial Strategy Policies a) Policy WCS1: Provisions of Homes and Jobs 2006-2030 – COMMENT/OBJECT 2.7 Paragraph 3.22 of BP1: Development of the Proposed Submission Core Strategy demonstrates the quantum of development identified in the plan period has resulted from ‘local needs and tested against capacities and constraints’ and demonstrates that a reduction from the South East Plan figure of 11,000 dwellings to 9,600 dwellings is appropriate. Sections 5 to 8 of BP1: Development of the Proposed Submission Core Strategy detail the justification for this approach and are expressed in the CS in paragraphs 3.8 – 3.17. 2.8 However, whilst the basis for proposed Policy WCS1 has been detailed within the Evidence Base and therefore could be considered ‘sound’ in this respect, it has not had due regard to the South East Plan, which still forms part of the Development Plan. PPS12 identifies under Para 4.50, that as a legal requirement ‘the plan conforms generally to the Regional Spatial Strategy’. 2.9 Notwithstanding the proposed intention to revoke the RSS and ‘emerging’ guidance contained within the ‘Localism Bill’, it is clear, that at this moment in time, the Core Strategy should have due regard to the requirements of the South East Plan, including the annual housing requirement from 2006 – 2010. 2.10 The overall housing requirement for Wealden as set out in the SEP (2006 – 2026) is 11,000 dwellings, which equates to 550 dwellings per annum over the 20 year plan period. Appendix 9 (p75) of BP2: Managing the Delivery of Housing, identifies that since 2006, a total of 1,332 dwellings have been completed in the District. 2.11 Table 1 below, demonstrates that against the SEP requirement since 2006, there has been ongoing failure to meet the housing requirement resulting in a current shortfall of 869 dwellings. Nevertheless, in seeking to reduce the overall housing requirement through locally derived evidence (to 9,600 dwellings), and increasing the plan period to 24 yrs (2006 to 2030) to provide an annual requirement of 400 dwellings per annum, it is evident WDC is still unable to deliver the proposed new housing requirement. Table 1 below demonstrates that even backdating the proposed Core Strategy figures to 2006, there is a current shortfall of 268 dwellings. Table 1: WDC Completions since 2006 vs SEP Requirement vs Proposed CS Requirement Year Actual Completions SEP Requirement(Surplus or Deficit) Proposed Submission Core Strategy Requirement(Surplus or Deficit) 2006/07 230 550 (- 320) 400 (-170) 2007/08 415 550 (- 135) 400 (- 50) 2008/09 350 550 (- 200) 400 (- 50) 2009/10 337 550 (- 213) 400 (- 63) Total 1,332 2,200 (- 868) 1,600 (- 268) 2.12 It is therefore considered, that in order to promote the delivery of housing to meet the actual local requirement as set out in the CS (9,600 dwellings), or the SEP requirement (11,000 dwellings), it is essential the CS facilitates the delivery of housing and does not seek to artificially maintain the delivery of 400 dwellings per annum or constrain the natural delivery within the District. 2.13 We have concerns with regards to WDC’s approach to windfall sites and the attempt to rely on these sites (when calculating completions) to prevent ‘over-provision’ as set out in paragraphs 10.34 – 10.36 of BP2: Managing the Delivery of Housing. 2.14 Whilst we support WDC’s approach that windfall development should not be used to project delivery (as required by PPS3), we do not consider that monitoring the delivery of high levels of windfall completions should be used as an argument to ‘slow down’ the phasing of allocated greenfield sites, as suggested in the Background Evidence and not fully explained within the Core Strategy. 2.15 This ‘preventative approach to delivery’ is at odds with the recent ‘Planning for Growth’ Ministerial Statement from Gregg Clarke MP on 23 March 2011. The statement clearly sets out the Government’s intentions for growth and reinforces the commitment to introduce ‘a strong presumption in favour of sustainable development’. The statement sets out ‘The planning system has a key role to play in this, by ensuring that the sustainable development needed to support economic growth is able to proceed as easily as possible’. The statement continues that ‘Governments clear expectation is that the answer to development and growth should, wherever possible be ‘yes’, except where this would compromise the key sustainable development principles set out in national planning policy’. 2.16 In reviewing paragraphs 10.34 – 10.36 of BP2: Managing the Delivery of Housing, we are concerned that ‘unplanned’ windfall sites could take precedent over the delivery allocated sites (and associated infrastructure), if these windfall sites are delivered in significant quantities (as
historically demonstrated within Appendix 9 of BP2: Managing the Delivery of Housing). This is at odds with the Ministerial Statement which calls for ‘local planning authorities to plan positively for new development.’ 2.17 Furthermore, para 10.34 of BP2: Managing the Delivery of Housing, refers to the provisions of PPS3 and that there may be no need for ‘specific management actions’ when assessed against the delivery trajectory and an acceptable 10%-20% range. However, it is clear that the principles of the ‘Plan, Monitor, Manage’ approach as set out in paragraphs 62 – 67 of PPS3, are predicated on the basis of reacting to any ‘under-provision’ and are not intended to respond to ‘over-provision’. WDC are incorrectly applying the ‘Implementation Strategy’ Guidance contained within PPS3 in the context of ‘over-provision’. 2.18 We therefore seek clarity over the intention of the content of paragraph 5.9 (extract below) of the CS where it identifies that ‘windfalls will be used as part of the manage and monitor system, and provide some limited contingency’. 5.9 Strategic Policy WCS2 makes no allowance for windfall sites. However over the past 10yrs around 200 dwellings per annum have been provided as windfall. Whilst the projected provision of such sites cannot be included at this stage in land supply projections, completions on these sorts of sites will count towards the overall house building totals achieved in Wealden. Windfalls will be used as part of the manage and monitor system, and provide some limited contingency. However, windfall sites can increase the demands of the District’s environmental and infrastructure constraints, and this in turn could have a determining effect on overall delivery capacity at any particular settlement. Through monitoring arrangements the Council will need to ensure that the unplanned development of windfall sites does not conflict with the strategy,’ 2.19 We seek clarity on what this ‘limited contingency’ represents, especially in the light of content of paragraphs 10.34 – 10.36 of BP2: Managing the Delivery of Housing and how the delivery of allocated sites will be reviewed in the context of windfall provision. We have noted the content of paragraph 5.17 of the CS which states: ‘5.17 The Council will, through its implementation and delivery framework and monitoring arrangements, ensure that delivery of its strategy and the overall provision of appropriate levels of growth is not prejudiced by windfalls. Further details of the management and phasing of delivery is constrained within out Background Paper 2: Managing the Delivery of Housing.’ 2.20 We therefore consider that the Background Evidence does not appear to support or relate to the content of the Core Strategy. If the approach as set out in paragraph 5.17 is the case, then why does the Background Evidence (para 10.34 – 10.36 of BP2: Managing the Delivery of Housing), or the Core Strategy (paragraphs 5.9, 5.17 and Policy WCS5 Managing the Release of Housing Land) need to have regard to the issue of ‘over-provision’ and the ‘re-phasing of sites’?

Details of Reasons for Soundess/ Legal Complaince:
Contrary to the headline statements made in many areas of the core submission document the major growth of privately owned housing in Hailsham started in the early sixties with the estates of Lansdowne, Hawkwood and even Hawthylands being completed by the mid-sixties. Further expansion continues to this day. Virtually all of this housing stock is in a good state of repair with no urgent economic justification for rebuild. However the core strategy is supposed to address planning for a further generation, i.e. to 2030. Existing and future owners of some properties may be hard pushed to maintain their properties in the state they would wish. There is some scope for the redevelopment of land within the older parts of the town for example the ribbon development that occurred prior to the estates of the sixties. It is the core role of the planning process to provide a reasonable balance of local accountability when for the reuse issue is examined on a case by case basis. It should be the aim of the core strategy to ensure that an organic reuse of the existing built environment is entertained NOT prevented! There is no ‘angry of Tunbridge Wells’ issue here - there is no scope for a mini housing estate in a back garden. There is scope for examination of the issue of reusing PDL in a sympathetic manner (economics generally dictate upwards rather outwards). Rather than an allocation of a further 1300 dwellings Hailsham could contribute a proportionate capability towards a district wide use of PDL.

Details of Changes to be Made:
Summary of all Representations - Proposed Submission Core Strategy Regulation 27 - Report 11th July 2011

Representation ID
1602

Person ID       Pelham Homes       Agent ID       Mrs Owen
107745                       102625       Jennifer Owen & Associates Ltd.

Paragraph          5.9

Sound  □ Yes  ☑ No  □ Justified  □ Effective  □ Consistent with national policy
Legally Compliant  □ Yes  □ No

Details of Reasons for Soundess/ Legal Complaince:
"Supplementary documents have been submitted but not attached, and may be viewed at the Council offices on request". Paragraph 5.9, Windfall should not be used as a contingency

Details of Changes to be Made:
Revision sought: Delete this paragraph.

Representation ID
81

Person ID       Redrow Homes (Eastern)       Agent ID       Mr Jones
337596                       518363       Boyer Planning Ltd

WCS3 Distribution of Employment (B Class) and Retail (convenience and comparison)

Sound  ☑ Yes  □ No  □ Justified  □ Effective  □ Consistent with national policy
Legally Compliant  ☑ Yes  □ No

Details of Reasons for Soundess/ Legal Complaince:
We note Strategic Policy WCS 3 - Distribution of Employment (B Class) and Retail (convenience and comparison) which seeks to allocate employment land within the Primary Centres, Secondary Centres and District Centres. We all note that there is no indication within the Core Strategy that any further employment land will be provided within any of the Rural Areas (under Strategic Policy WCS6), including Horam. In terms of existing business/ employment allocations para 3.22 of the Core Strategy states that "The Council's strategy is to encourage and support business in a flexible manner in order to improve economic prosperity and reduce economic disparities across the district". This includes "retaining existing business areas, where viable, and review all allocated site and business areas identified in the adopted Local Plan". The latter point is further noted at para 3.23 in that previously allocated employment sites within the Local Plan as well as business areas and associated policies will require review through the LDF process - "The Core Strategy details how much employment land will be provided and where, however policies concerning business and employment within Wealden will be contained within the Site Allocation Development Plan Documents, unless already contained within national guidance". Therefore, whilst no new allocations are provided within the Rural Areas, we support the flexible review of existing business/ employment areas through the LDF process. In particular the review of the Former Merrydown Cider Factory site within Horam which is no longer viable for its existing business/ employment allocation and is better suited to being redeveloped for housing and contributing to the dwelling allocation directed to Horam in accordance with policy WCS5: Rural Area Strategy and WCS2: Distribution of Housing Growth 2006 - 2030.

Details of Changes to be Made:
Details of Reasons for Soundness/ Legal Complaince:
Eastbourne Borough Council acknowledges the new allocations in the Proposed Submission Core Strategy. The identification of 16,890sq. metres of new employment land (B1, B2 and B8) at Polegate and Willingdon/Stone Cross will provide local jobs and greater employment choices. The additional 8,650 sq. metres of new employment land and 6,230 sq. metres of retail land in Hailsham will help the town become more self-sufficient and independent. Eastbourne Borough Council notes the approach taken in Policy WCS3, which concentrates a significant proportion of employment development in the southern part of Wealden, close to a large pool of labour and where there is relatively good access to public transport, shops, and other services and facilities. Wealden is proposing a dedicated employment location at Land at Dittons Road, Polegate (SD5) and this is a gateway location on one of the key strategic arterial roads into Eastbourne. It provides an opportunity to provide an attractive business area that people will see on their approach to the town along Golden Jubilee Way (A22). The peripheral nature of employment land can lead to problems relating to accessibility, as many people have to travel long distances to reach these employment areas. Much of the northern part of Wealden is limited by relatively poor road and public transport links, as well as by significant environmental constraints. By focusing the largest proportion of development in the southern part of Wealden, the link between jobs and houses can be consolidated leading to a more sustainable form of development that meets the needs of residents and businesses alike.

Details of Changes to be Made:

Details of Reasons for Soundess/ Legal Complaince:
WJPC is concerned at the numerous references to Polegate and Willingdon as one settlement, as highlighted in 3.3 Table 1, 3.11, SPO6, WCS2, WCS3, 5.13, 6.31(2), Figure 8 and Figure 12. In particular, Figure 2 showing settlement hierarchy, places Polegate and Willingdon as one settlement, yet details other settlements individually.

Details of Changes to be Made:
Representation ID
665
Person ID  Mr Place  Agent ID
520783
WCS3 Distribution of Employment (B Class) and Retail (convenience and comparison)

Sound  ☐ Yes  ☐ No  ☐ Justified  ☐ Effective  ☐ Consistent with national policy
Legally Compliant  ☐ Yes  ☐ No

Details of Reasons for Soundess/ Legal Complaince:
With Wealden's approval of three major supermarkets in the Crowborough area, the High Street no longer has small shops and businesses in the way that it used to be. These supermarkets have monopolised on the weekly shop for most and in so doing have destroyed the small businesses and local employment. I have three sons who are 30 plus and all have had to get jobs involving at least a 30 mile trip to get to work. With the current and future travel costs and pollution problems, we need to concentrate on building local businesses with trade apprenticeships (five year, not useless NVQ's). The economy relies on manufacture and innovation not necessarily shop keepers who sell foreign goods.

Details of Changes to be Made:

Representation ID
707
Person ID  Mr & Goldrick  Agent ID
108548
WCS3 Distribution of Employment (B Class) and Retail (convenience and comparison)

Sound  ☐ Yes  ☐ No  ☐ Justified  ☐ Effective  ☐ Consistent with national policy
Legally Compliant  ☐ Yes  ☐ No

Details of Reasons for Soundess/ Legal Complaince:
Our first and most paramount concern over any development is the loss of countryside and of wildlife living there. Poor animals and birds do not have any choice in us humans constantly eating away at their living environments, which has already been eroded enormously. We have far fewer plant life and other forms of life due to developments such as the above, and if we carry on the way we are going, even more plants and creatures will become extinct to add to the ones that already have. We wrote, to not avail, with our objections over the 550 homes and an industrial estate being built between Ditton's Corner and the Polegate Bypass. Unfortunately, building has already started there. Hopefully this letter will make a difference. As well as the loss of plants and wildlife, these building schemes make a huge impact on the people who already live here. Roads are not going to be able to cope with the extra traffic created by any development. The A27 already can't cope with the heavy traffic it already has. Plus the fact, there's too few parking spaces, and the few that we have - like the Co-op Car park has already had houses built on that! Public transport is also a joke. Often there is only standing room on our squashed trains. Our buses are also extremely infrequent. Eastbourne District General Hospital is full to bursting and can't cope with any more patients. The same is true for doctor's surgeries and dentists, who are only taking on private patients now. Schools here are in the same situation. We have therefore made a decision not to support this development for the above reasons.

Details of Changes to be Made:
Details of Reasons for Soundess/ Legal Complaince:
It is acknowledged in the document that Uckfield town centre is already congested. The addition of more housing as proposed, along with a much larger retail amount will completely negate any new road and town centre redevelopment efforts to overcome this. If the population of Uckfield means more retail area is needed this should be sited so as to not add to the town centre congestion. Therefore the current siting is unsound. Equally under this document’s proposals many of the people who live in the surrounding rural areas will have to travel to Uckfield as this is proposed to have the main employment sites for the area. Therefore equally these should be sited so as not to add to the town centre congestion. Therefore the current siting is unsound.

Details of Changes to be Made:
Site any new retail buildings away from the town centre, or in such a way that the access to them won’t add to the congestion. Site any new employment areas away from the town centre, or in such a way that the access to them won’t add to the congestion.
I write to register my objections to the Polegate and Willingdon and Stone Cross area strategy in the above document on the basis that it is not sound or justified for the following reasons: NUMBER OF ALLOCATED HOUSING CONTRADICTS THE AMOUNT WHICH IS CLAIMED TO EVEN BE SUSTAINABLE. It is very disappointing that despite repeatedly asked questions at Wealden District Council’s full council meetings and committees regarding the proposed 1265 new houses for this area, Wealden District Council’s position is that it is waiting for the outcome of the Honey Farm Appeal where the proposal is for up to 520 houses. So far, there has never been any mention of any alternative plans should the Council lose the appeal. The Council appears to be confident in defending this appeal, despite also contradicting itself with using the exact same reasons in the rejection of Honey Farm at Committee to justify and support those proposals within the Core Strategy for the Polegate and Willingdon area, for a site which is only down the road where the same problems would apply. Wealden District Council clearly has no plan B and if Wealden District Council cannot successfully defend this appeal, Willingdon and Polegate will automatic be lumbered with 1785 extra houses. For this reason alone, the Proposed Submission Document is irresponsible and misleading the communities. In addition reason as below; INFRASTRUCTURE- SCHOOL AND HEALTH FACILITIES As it stands, the local Schools and health facilities are only just able to cope with the high level of service users in the Eastbourne area. An estimated increase in the local population by at least 2,000 – 3,200 people will see a severe strain on the local resources available within the infrastructure. Willingdon Community School is already oversubscribed and as an example, mobile classrooms were introduced some years ago to accommodate the increase in students. To propose a further extension at Willingdon Community School to take on more students will see a further strain on the infrastructure, the impact of the surrounding roads and parking will be severely impacted. The need of a new community school and primary school has not been fully considered and no site has been identified within the plans. The proposed new medical center at the former Towermill Place remains very uncertain, this council had amended the wording at the end, it is misleading that the new medical center is part of the Infrastructure when the funding is so uncertain. This was not revealed until Councillor Stephen Shing questioned this at a cabinet meeting. PUBLIC TRANSPORT In the Core Strategy - Proposed Submission Document and at Wealden District Council meetings, the bus corridor has been mentioned many times and our group has submitted that it would simply be unworkable. The South Wealden and Eastbourne Transport Study (SWETS) report had used difference format on the same Trip Rates & Trip Generations, it make it very hard for the general public to understand exactly what the Trip Rates & Trip Generations are. However, Wealden District Council in the Honey Farm Appeal submissions, indicated that the traffic and road INFRASTRUCTURE can not accommodate the estimated traffic generated from the 520 houses, as there is only about 50 meters from Cophall roundabout. I would question how 50% more houses and 8600 square metres of employment floor space would able to cope in the same road. Using the formula, the Trip Generation would be 450 both ways, which equates to approximately 38 vehicle movements every 5 minutes. This Council has not been able to answer my question fully and has
Summary of all Representations - Proposed Submission Core Strategy Regulation 27 - Report 11th July 2011

simply said that would be the Highways Authority’s responsibility. The report does not even address how this traffic problem will be address at present or in the future. The increase of about 301 trips per hour, 5,016 cars per minute, will affect other junctions seriously and create a bottleneck at A22/A27 and the Polegate cross roads, currently at peak times, there are long queues from Cophall roundabout back to Lower Willingdon and C40 Wannock Road. Within the honey Farm appeal, this Council argues that it would be difficult for vehicle users to enter the Cophall roundabout and make their journeys to the A27 to get to Lewes or Hailsham and other areas. The Council also contends that the infrastructure would not be able to cope with the number of dwellings at the site, despite this argument raised by the Council, those same arguments also apply to the Mornings Mill Farm site, which this Council has failed to consider. PROPOSED SUBMISSION CORE STRATEGY OPTION CONSULTATION 2007 Again, in 2007, 749 Polegate and Willingdon residents submitted their consultation slips to Wealden District Council and the majority of their views was that Hindsland should not be developed and should remain as a green area and recreational ground. However, Wealden District Council and other groups within the council decided not to accept their consultation slips and their views. At the same time, Wealden District Council received about 1,100 from the whole district. Therefore the 749 submissions from Polegate and Willingdon residents were ignored, as result this seems to have controlled the outcome. Most members of this Council opposed the Honey Farm proposal, their reasons are almost the same as the reasons we have submitted that apply to Hindsland / Mornings Mill Farm. WATER AND SEWAGE On many occasions, our group has submitted that the water supply and sewage is at their full capacity. During meetings at Wealden District Council, we have been told that the sewage has the capacity for the maximum of 1000 new houses. The proposed house numbers are well over the limit of its full capacity. Again these essential facilities continue remain outstanding and the issues ignored GREEN SPACE It is important that Hindsland / Mornings Mill Farm continue to remain as a green lung between Polegate and Willingdon, according to the local plan. Currently Polegate Town and Willingdon & Jevington Parish Council are short of amenity and recreation space, the shortage is between 30 - 40% below of the national average. In the Proposed Submission Core Strategy Document there is nothing to address this issue.

I trust that the above representations will be placed on record accordingly.

Details of Changes to be Made:

<table>
<thead>
<tr>
<th>Representation ID</th>
<th>Person ID</th>
<th>Agent ID</th>
<th>Details of Reasons for Soundess/ Legal Complaince:</th>
</tr>
</thead>
<tbody>
<tr>
<td>1190</td>
<td>Mrs Kelly</td>
<td>534595</td>
<td>Rydon queries reference to ‘Stone Cross’ in this table. It is clear from paragraph 6.31 (3) that the allocation of 16,890 sqm of employment floorspace relates to the Polegate and Willingdon area, not Stone Cross. WCS3 is therefore inconsistent with para 6.31</td>
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<tr>
<td></td>
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<td>Amend WCS3 to be consistent with para 6.31 (3)</td>
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NUMBER OF ALLOCATED HOUSING CONTRADICTS THE AMOUNT WHICH IS CLAIMED TO EVEN BE SUSTAINABLE It is very disappointing that despite repeatedly asked questions at Wealden District Council’s full council meetings and committees regarding the proposed 1265 new houses for this area, Wealden District Council’s position is that it is waiting for the outcome of the Honey Farm Appeal where the proposal is for up to 520 houses. So far, there has never been any mention of any alternative plans should the Council lose the appeal. The Council appears to be confident in defending this appeal, despite also contradicting itself with by using the exact same reasons in the rejection of Honey Farm at Committee to justify and support those proposals within the Core Strategy for the Polegate and Willingdon area, for a site which is only down the road where the same problems would apply. 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Currently there is heavy traffic congestion along the A2270 at peak times, with the extra traffic joining A2270 created from the proposed Morning Mills site, it would be impossible for the bus to move from A to B. The Council should be aware that the bus companies contend that there are not enough service users in the area which has resulted in a number of cuts in the bus services within recent years. There is no doubt the choice of public transport is very limited which makes the travel plans unfeasible, despite this, this Council is still adamant that the Morning Mills site is suitable. For example, in the Pevensey Road area, North Polegate, there are about 640 dwellings. A few months ago, Stagecoach had considered withdrawing the main bus service for this area. It is very difficult to believe that the proposal of 700 dwellings will actually sustain the service and the bus service will actually remain in place. The local roads and traffic infrastructure is already running to it’s maximum capacity at present. During peak commuting hours, traffic is often congested along the A2270 Eastbourne Road, from as far as Willingdon roundabout to Cophall roundabout, Polegate High Street and C40 Wannock Road and Hailsham Road. Any increase in the number of vehicle movements from the proposed Morning Mills Farm needs to address this issue with a workable plan. As yet, Wealden District Council has not been confirm how the highways issue will be addressed and how the traffic will work to accommodate the current high volume of traffic movements and with the extra proposed 700 new allocations (dwellings) and 8600 square metres of employment floor space on land at Hindsland / Morning Mill Farm would create. 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Details of Changes to be Made:
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I refer to pages 69 and 70 of the East Sussex County Council Highways' Report dated 10 September 2010 for information of their findings, which is relevant to my submissions above. COPHALL ROUNDABOUT SENSITIVITY TEST 3.1 Using the Dittons Road trip rates, the development traffic from 520 dwellings on the PW1 site has been calculated as follows: Table 3.1: 520 Dwellings Trip Rates & Trip Generations Time Period Trip Rates Trip Generations AM Peak Arrive Depart Two way Arrive Depart Two way (0800 - 0900) 0.12 0.46 0.58 62 239 301 The data shows an increase of about 301 trips per hour, 5.016 cars per minute, will affect other junctions seriously and create a bottleneck at A22/A27 and the Polegate cross roads, currently at peak times, there are long queues from Cophall roundabout back to Lower Willingdon and C40 Wannock Road. 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To propose a further extension at Willingdon Community School to take on more students will see a further strain on the infrastructure, the impact of the surrounded roads and parking will be severely impacted. The need of a new community school and primary school has not been fully considered and no site has been identified within the plans. The proposed new medical center at the former Towermill Place remains very uncertain, this council had amended the wording at the end, it is misleading that the new medical center is part of the Infrastructure when the funding is so uncertain, this was not revealed until I questioned this at a cabinet meeting. PUBLIC TRANSPORT In the Core Strategy - Proposed Submission Document and at Wealden District Council meetings, the bus corridor has been mentioned many times and our group has submitted that it would simply be unworkable. Currently there is heavy traffic congestion along the A2270 at peak times, with the extra traffic joining A2270 created from the proposed Morning Mills site, it would be impossible for the bus to move from A to B. The Council should be aware that the bus companies contend that there are not enough service users in the area which has resulted in a number of cuts in the bus services within recent years. There is no doubt the choice of public transport is very limited which makes the travel plans unfeasible, despite this, this Council is still adamant that the Morning Mills site is suitable For example, in the Pevensey Road area, North Polegate, there are about 640 dwellings. A few months ago, Stagecoach had considered withdrawing the main bus service for this area. It is very difficult to believe that the proposal of 700 dwellings will actually sustain the service and the bus service will actually remain in place. PROPOSED SUBMISSION CORE STRATEGY OPTION CONSULTATION
2007 Again, in 2007, 749 Polegate and Willingdon residents submitted their consultation slips to Wealden District Council and the majority of their views was that Hindslands should not be developed and should remain as a green area and recreational ground. However, Wealden District Council and other groups within the council decided not to accept their consultation slips and their views. At the same time, Wealden District Council received about 1,100 from the whole district. Therefore the 749 submissions from Polegate and Willingdon residents were ignored, as result this seems to have controlled the outcome. Most members of this Council opposed the Honey Farm proposal, their reasons are almost the same as the reasons we have submitted that apply to Hindsland / Mornings Mill Farm. In addition, in the Wealden non-statutory local plan consultation in 2003, we presented a petition signed by 1000 Willingdon households to Wealden District Council. Hindsland / Mornings Mill Farm is not suitable to build extra 1000 new homes. I am pleased to say that the Council and Councillors had made a very sensible decision at the time, 8 years on, there are no changes or improvements within the infrastructure. We are continually facing shortage of secondary school places, primary school places, nursery places and facilities including sports and play facilities, amenity space, parking places an indoor sports hall and swimming pool and yet this Council considers that these will be provided, how? There is no mention of any sustainable or plausible proposal. GREEN SPACE It is important that Hindsland / Mornings Mill Farm continue to remain as a green site between Polegate and Willingdon, according to the local plan. Currently Polegate Town and Willingdon & Jevington Parish Council are short of amenity and recreation space, the shortage is between 30 - 40% below of the national average. In the Proposed Submission Core Strategy Document there is nothing to address this issue. WATER AND SEWAGE On many occasions, our group has submitted that the water supply and sewage is at their full capacity. During meetings at Wealden District Council, we have been told that the sewage has the capacity for the maximum of 1000 new houses. The proposed house numbers are well over the limit of its full capacity. Again these essential facilities continue remain outstanding and the issues ignored

Details of Changes to be Made:

<table>
<thead>
<tr>
<th>Representation ID</th>
<th>1179</th>
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<tbody>
<tr>
<td>Person ID</td>
<td>522185</td>
</tr>
<tr>
<td>Agent ID</td>
<td>Mr Scott 261712</td>
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<tr>
<td>Agent ID</td>
<td>Mr Scott Smiths Gore</td>
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<tr>
<td>WCS3 Distribution of Employment (B Class) and Retail (convenience and comparison) Policy 3</td>
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<tr>
<td>Sound</td>
<td>☑ Yes ☑ No ☑ Justified ☑ Effective ☑ Consistent with national policy</td>
</tr>
<tr>
<td>Legally Compliant</td>
<td>☑ Yes ☑ No</td>
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Details of Reasons for Soundess/ Legal Complaince:
The evidence collected by the Council in the preparation of the Core Strategy has identified that Crowborough currently has an underprovision of employment space compared with other settlements. Indeed, the provision of employment opportunities is a key objective of the town council. It is clear therefore that this underprovision is being used as a reason for not providing for any employment space within the town through this policy - a decision which does not appear to be supported by any conclusive evidence other than assumptions about the workings of the local employment market. It is suggested that in order to be made sound, this policy will need to be supported by detailed information about the local employment and commercial unit market, and also by travel towork patterns within the district. In addition, it is suggested that the closure of the Council offices in the next five years will lead to a significant reduction in employment within the town that should be planned for within this document.

Details of Changes to be Made:
Review employment allocation at Crowborough to support Core Strategy
Representations ID 1186
Person ID Miss Heron  Agent ID 534582
WCS3 Distribution of Policy 3 Employment (B Class) and Retail (convenience and comparison)

Sound  □ Yes  ☑ No  ☑ Justified  ☑ Effective  ☑ Consistent with national policy
Legally Compliant  □ Yes  □ No

Details of Reasons for Soundess/ Legal Compliance:
The evidence base does not justify a zero increase in employment and retail provision in Heathfield up to 2030. It is also inconsistent with the 'Heathfield Area Strategy' para. 642 point 5 that states that the strategy seeks to "support employment growth and increase the range of job opportunities by encouraging small-scale new development around the town" and point 6 to "support an increase in retail floorspace in the town".

Details of Changes to be Made:
Identify new employment and retail allocations in the town

Representation ID 1156
Person ID Mar 533827
Agent ID Mr Hughes 533824
WCS3 Distribution of Policy 3 Employment (B Class) and Retail (convenience and comparison)

Sound  □ Yes  ☑ No  ☑ Justified  □ Effective  □ Consistent with national policy
Legally Compliant  ☑ Yes  □ No

Details of Reasons for Soundess/ Legal Compliance:
The amalgamation of Polegate / Willingdon/ Stone Cross is entirely false and inconsistent with all other approaches in the Core Strategy (for example see WCS2 where Polegate and Willingdon is considered separately from Stone Cross and Westham) and the settlements need to be considered separately with Polegate and Willingdon having new allocations of 16890 sq. metres and Stone Cross and Westham as a matter of fact having 0 sq. metres as part of the Rural areas consistent with its designation as a Local Service Centre/Neighbourhood Centre.

Details of Changes to be Made:
Delete Stone Cross from the town/settlement list

Page 569 of 1511
Details of Reasons for Soundness/ Legal Complaince:
Policy WCS3: Distribution of Employment (B Class) and Retail (Convenience and Comparison) - SUPPORT 2.25
Policy WCS3 sets out the new allocations for employment and retail provision over the plan period. Whilst we
recognise there are to be no new allocations of employment or retail in Heathfield, Crowborough and the Rural
Areas, we consider that the Policy WCS3 needs to recognise the ‘committed’ employment and retail sites in these,
and other locations. This should be reflected in Policy WCS3 and ensure consistency to how Policy WCS2
(Housing Growth) and Policy WCS3 (Employment Growth) are presented within the Core Strategy.

Details of Changes to be Made:
Policy WCS3: Distribution of Employment (B Class) and Retail (Convenience and Comparison) - SUPPORT 2.25
Policy WCS3 sets out the new allocations for employment and retail provision over the plan period. Whilst we
recognise there are to be no new allocations of employment or retail in Heathfield, Crowborough and the Rural
Areas, we consider that the Policy WCS3 needs to recognise the ‘committed’ employment and retail sites in these,
and other locations. This should be reflected in Policy WCS3 and ensure consistency to how Policy WCS2
(Housing Growth) and Policy WCS3 (Employment Growth) are presented within the Core Strategy.

Details of Reasons for Soundness/ Legal Complaince:
5. We support the flexibility contained in Policy WCS3 regarding the distribution of employment floor space
between Polegate and Willingdon and Stone Cross. However, in view of the current retail provision in Polegate
and the scale of the development planned for the area, we consider that a retail allocation should be included for
Polegate, rather than concentrating new provision solely in Uckfield and Hailsham. By improving facilities at
Polegate will reduce the need for both existing and future residents to travel further afield to meet their shopping
needs, which is especially important in view of the high proportion of elderly residents. Whilst trips will be made to
nearby Eastbourne, which is at a higher level of the retail hierarchy, there would be advantage if the day to day
needs of residents are met in Polegate. Whilst Polegate town centre is constrained, opportunities may arise
through redevelopment and there may be scope for local facilities as part of the new residential growth area.

Details of Changes to be Made:
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<th>Name</th>
<th>Agent ID</th>
<th>Company</th>
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<tbody>
<tr>
<td>1358</td>
<td>Mr Richardson</td>
<td>Gleeson Developments Ltd</td>
<td>220620</td>
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WCS3 Distribution of Policy 3 Employment (B Class) and Retail (convenience and comparison)

**Sound**  Yes  No  Justified  Effective  Consistent with national policy

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<tr>
<th>Legally Compliant</th>
<th>Yes</th>
<th>No</th>
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**Details of Reasons for Soundess/ Legal Complaince:**

We support the Councils identification of Hailsham as a location to take new employment allocations to support the increased level of housing that will be accommodated in the town. We would however suggest, as with our earlier comments that a contingency / flexibility is built into the policy to allow additional employment growth to be accommodated should demand and evidence show that it is required.

**Details of Changes to be Made:**

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<th>Name</th>
<th>Agent ID</th>
<th>Company</th>
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<tr>
<td>1449</td>
<td>Ms Greenhaigh</td>
<td>Valad Property Group</td>
<td>522281</td>
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</tr>
</tbody>
</table>

WCS3 Distribution of Policy 3 Employment (B Class) and Retail (convenience and comparison)

**Sound**  No  Yes  Justified  Effective  Consistent with national policy

<table>
<thead>
<tr>
<th>Legally Compliant</th>
<th>Yes</th>
<th>No</th>
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**Details of Reasons for Soundess/ Legal Complaince:**

Policy WCS3 makes no provision for additional employment provision in the rural area (which includes Westham) even though the ELR2008 indicated that our client's site (Mountney Bridge Industrial Estate) could accommodate growth/development. Policy WCS3 does not therefore correspond with paragraphs 3.19 or 3.22 which support intensification of employment areas. Policy SPO6 is unclear and unsound, it is implied that any new jobs created will only make a positive contribution to the towns of Uckfield, Hailsham, Polegate and Willingdon.

**Details of Changes to be Made:**

Policy SPO6 should be amended to make it clear that new economic development will be encouraged across all settlements in the district, particularly those in South Wealden, such as Westham. We also consider that the Mountney Bridge Industrial Estate should be identified for intensification and expansion. WCS3 should refer to the other locations which can accommodate intensification and expansion and there should be recognition that some lower order settlements such as Westham can contribute to economic growth.
Summary of all Representations - Proposed Submission Core Strategy Regulation 27 - Report 11th July 2011

Representation ID
1539
Person ID  Mrs  Rudin
105986  Forest Row Parish Council
Agent ID
WCS3 Distribution of Policy 3
Employment (B Class)
and Retail (convenience
and comparison)
Sound  ☑ Yes  ☐ No  ☐ Justified  ☐ Effective  ☐ Consistent with national policy
Legally Compliant  ☑ Yes  ☐ No
Details of Reasons for Soundess/ Legal Complaince:
We would broadly support the distribution of housing growth around the edges of the towns in the district but we
will refer to the numbers allocated to rural villages further on. Similarly the distribution of employment as indicated
seems a little skewed, ignoring the rural villages altogether. We feel that the growth in employment opportunities is
the key to sustainability of rural communities. The Growth in employment opportunities is directly correlated to the
growth of housing.
Details of Changes to be Made:

Representation ID
1570
Person ID  Mr  Williams
103948  Kember Loudon Williams
Agent ID
WCS3 Distribution of Policy 3
Employment (B Class)
and Retail (convenience
and comparison)
Sound  ☐ Yes  ☑ No  ☑ Justified  ☑ Effective  ☐ Consistent with national policy
Legally Compliant  ☑ Yes  ☐ No
Details of Reasons for Soundess/ Legal Complaince:
The Core Strategy is unsound in that no provision is made for any employment/economic growth over its 24 year
lifespan for two of the District's principal settlements at Heathfield and Crowborough
Details of Changes to be Made:

Representation ID
374
Person ID  Mrs  McKeown
521906  Hallam Land Management Limited
Agent ID
WCS3 Distribution of Policy 3
Employment (B Class)
and Retail (convenience
and comparison)
Sound  ☑ Yes  ☐ No  ☐ Justified  ☐ Effective  ☐ Consistent with national policy
Legally Compliant  ☑ Yes  ☐ No
Details of Reasons for Soundess/ Legal Complaince:
Hallam Land Management Limited support the proposed employment allocations but suggest that the allocations
be based on a minimum net floorspace.
Details of Changes to be Made:
Wealden Councillors for Crowborough

Details of Reasons for Soundness/ Legal Compliance:
Employment There is a statement in para 6.33 that the number of Crowborough people working in the town is low, there is substantial out-commuting and there are pockets of unemployment, yet no additional employment land is designated. At the consultation meetings in Crowborough leading up to the development of the core strategy, the need for more local employment was emphasized by many residents and it is the experience of local councillors that this is a key issue for Crowborough. The Crowborough councillors wish to reiterate their long-held view that land near the Army Camp should be allocated for expanding employment opportunities, in spite of it being within the AONB. This location would avoid the need for heavy traffic to travel through congested parts of Crowborough and in particular avoid the need for it to use Western Road. However, the area round the Army Camp is sufficiently close to the centre to be a sustainable location.

Details of Changes to be Made:

Concern raised at the reference to Polegate and Willingdon as one settlement

Details of Changes to be Made:
### Representation ID 1652
**Person ID**: 516047  
**Agent ID**: 516026

**WCS3 Distribution of Employment (B Class) and Retail (convenience and comparison)**

**Sound**: Yes  
**Legally Compliant**: Yes

**Details of Reasons for Soundness/Legal Compliance:**
The evidence base does not justify a zero increase in employment and retail provision in Crowborough up to 2030. This is particularly the case as the Council’s move of their offices to Hailsham will move jobs away from Crowborough.

**Details of Changes to be Made:**
Increase the dwelling allocation to Crowborough having regard to housing needs, economic growth objectives and wider housing requirements outside the District. This can be achieved by an overall increase in housing numbers rather than taking numbers away from other locations. It is also practicable without breaching capacity.

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### Representation ID 1669
**Person ID**: 521928  
**Agent ID**: 536448

**WCS3 Distribution of Employment (B Class) and Retail (convenience and comparison)**

WSL supports the Council’s intention that Uckfield should deliver 1,000 new dwellings in order to assist in meeting the identified housing requirement for the District. Policy WCS3 is therefore supported. WSL also supports Policy WCS3 and Retail (convenience and comparison) which directs 12,650sqm new employment allocations to Uckfield.

**Details of Changes to be Made:**

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### Representation ID 109
**Person ID**: 106240  
**Agent ID**: 5.1

**Paragraph**: 5.1

**Sound**: Yes  
**Legally Compliant**: Yes

**Details of Reasons for Soundness/Legal Compliance:**
I do not consider any change is necessary in respect of WCS4: Para 5.10 and Fig 7 which is sound, subject to highway access requirements for SD2.

**Details of Changes to be Made:**
Summary of all Representations - Proposed Submission Core Strategy Regulation 27 - Report 11th July 2011

**Representation ID**
108

**Person ID**  Rev  Elphick  **Agent ID**
106240

**WCS4 Strategic Development Areas**
Policy 4

**Sound**  ✔ Yes  ☐ No  ☐ Justified  ☐ Effective  ☐ Consistent with national policy

**Legally Compliant**  ✔ Yes  ☐ No

**Details of Reasons for Soundess/ Legal Complaince:**
I do not consider any change is necessary in respect of WCS4: Para 5.10 and Fig 7 which is sound, subject to highway access requirements for SD2

**Details of Changes to be Made:**
The Core Strategy is not legally compliant and is unsound because of its proposals for an urban extension to the north west of Heathfield (Strategic Development Area SD11). Whilst the principle of accommodating housing growth in the broad location of north west Heathfield is supported, the Core Strategy’s proposals are deficient because they: (a) fail to take a comprehensive approach to the development of this area and so are not founded on a robust and credible evidence base and are not the most appropriate strategy when considered against the reasonable alternatives in this location, thus failing the soundness test in paragraph 4.36 of PPS12 that they are “justifiable”. (b) constitute an unjustified encroachment into the High Weald AONB and so are not the most appropriate strategy when considered against the reasonable alternatives in this location, thus failing the same “justifiable” test in PPS12 and also the soundness test in paragraph 4.52 of PPS12 that they are “consistent with national policy”. Paragraph 16(v) of PPS7 requires the Council in preparing the Core Strategy to “conserve…sites of landscape…value, in accordance with statutory designations”. Paragraph 22(ii) of PPS7 requires that “major developments” should only take place within the AONB after “the most rigorous examination” and an assessment of “the scope for developing elsewhere outside the designated area or meeting the need for it in some other way”. The Council has failed to properly assess the scope for meeting the need for development on previously developed land at north west Heathfield that is not in the AONB. (c) utilise less accessible and less sustainable land and so are not the most appropriate strategy when considered against reasonable alternatives in this location, thus failing the same “justifiable” test in PPS12. (d) fail to provide adequate safeguarding of amenities of existing dwellings (if those dwellings are to be excluded from the urban extension as currently proposed) and fail to integrate into the existing urban form, thus failing the soundness test in paragraph 4.52 of PPS12 that the proposals are consistent with national policy. Paragraph 34 of PPS1 and paragraph 13 of PPS3 require the Council to reject design which is “inappropriate in its context” and paragraph 35 of PPS1 requires development to be designed so that it will be “integrated into the existing urban form and the natural and built environments”. THE PROPOSED SUBMISSION CORE STRATEGY 3. We object to the following parts of the Core Strategy. Because the objections are interconnected, we have set out all the relevant matters in this response, although this particular objection only relates to the specific part of the Core Strategy identified in our response to Q1 above. Our objections are as follows: (i) The omission from Spatial Planning Objective SPO1 of any reference to minimising the loss of nationally designated landscapes, including the High Weald AONB. Paragraph 16(v) of PPS3 requires the Council to conserve the AONB and since it is clear that the Council is proposing to meet part of the District’s development needs by using land within the AONB, the Council should establish a clear objective that only the minimum AONB land should be used for this purpose and wherever possible non-AONB land should be used in preference. (ii) The reference in Policy WCS2 to the broad locations for housing development being shown as insets on the Key Diagram. We object to the inset for Heathfield in relation to the way it shows the proposal SD11 and consequently object to this reference to that inset plan in Policy WCS2. (iii) The reference in Policy WCS4 to SD11: Land at North West of Heathfield. We object to the way that SD11 is described in Chapter 6 of the Core Strategy and shown on the Key Diagram and as a result object to the reference to SD11 in Policy WCS4. (iv) The omission from paragraph 5.8 of any aim to maximise the use of previously developed land in meeting existing and future housing needs. Notwithstanding the recent changes to PPS3 it remains a national objective to prioritise the use of previously developed land, in accordance with paragraph 21 of PPS1 and paragraph 40 of PPS3. (v) The reference in paragraph 6.40 to the identification of potential sites for housing “through the SHLAA”. We object to the inclusion of Site 155/1210 in its current form as shown in the SHLAA and consequently object to this reference to that site in paragraph 6.40. (vi) The reference in paragraph 6.41 to the “most suitable location” being “within the AONB” and that this land could be developed “without strategic adverse impact on the landscape”. The Council’s evidence base does not demonstrate that the land within the AONB is more suitable for development than the non-AONB previously developed land on High Street. There is no assessment by the Council of the suitability of this non-AONB land (which includes the objector’s land at Lavender Cottage, High Street, Heathfield, TN21 0UP) and yet it is more suitable than the AONB land, being (i) not subject to a national landscape designation, (ii) previously developed land, (iii) within the existing settlement boundary, and (iv) well related and integrated into the urban area and existing transport connections. In addition, the Council’s evidence base does not show that 160 dwellings can be provided in the AONB without strategic adverse impact on the landscape. The capacity of 160 dwellings for SD11 would appear to derive from the assumed capacity of 2 adjacent SHLAA sites at north west Heathfield (Site 155/1210 with a capacity of 123 dwellings at 40 dph and Site 307/1210 with a capacity of 35 dwellings at 35 dph).
Lavender Cottage, are willing to make their land available as part of a wider development. The objectors have made this known to the Council since at least August 2010. The principle of redevelopment for more intensive SD11 takes an opportunistic approach. It utilises substantial areas of greenfield land as the main development shareholders, the choice of this location seems to be influenced simply by the fact that these 2 sites were SHLAA indicates that Site 155/1210 is in multiple ownerships and Site 307/1210 is owned by a company with 7 areas (and by implication from the SHLAA one existing property simply as a means of access). Although the reason set out at (x) above. 4. We now propose to elaborate on these objections. Piecemeal not comprehensive 5. Proposal SD11 in the same way that they are shown on Figure 10 and they are not acceptable for the same previously developed land, the footprint of the buildings and their associated driveways and hardstandings clearly of. 7. The site of SD11 is on sloping ground set back behind existing development which separates the site from Heathfield as identified on the Proposals Map of the saved Local Plan and paragraph 6.48 of the Core Strategy confirms that within development boundaries “the principle of development is acceptable”. The principle of redeveloping this land to provide more intensive residential development has already been accepted by the Council, with the grant of planning permissions at Brackenside (WD/08/0329) for 3 dwellings in place of 1 dwelling, and at Oaksdown/Lowlands (WD/2011/0400) for 9 apartments in the place of 2 dwellings. The more intensive development of the non-AONB land on the High Street frontage would minimise (or may even remove) the need for the use of AONB land. This option would plainly be a more suitable alternative than the use only of land “within the AONB” as proposed in the Core Strategy. (viii) The reference in paragraph 6.41 to “no suitable alternative contingency land is available”. The land at Oaksdown/Lowlands is available for development (as confirmed by the recent renewal of planning permission). The objectors’ land at Lavender Cottage is available for development (and this has been made known to the Council since at least August 2010). The land at Woodhatch is relied on as being available for development in order to provide the access for SHLAA site 155/1210. The objectors understand that the land at Holmhurst could be made available for development. Thus, there is a continuous frontage of 5 plots of non-AONB land available (all with generous areas of garden land, most of which is excluded from the AONB) just on this part of the High Street. Were the Council to actively promote a comprehensive redevelopment of this area it is likely that other land in the vicinity would be made available. However, the Council has simply failed in its evidence base to assess this option. If it is necessary to identify contingency land then the hinterland of AONB land should be identified as contingency land, with priority being given to the development of the non-AONB land on the High Street frontage. Prioritising that land would be consistent with the policy objectives of minimising the loss of AONB land and maximising the use of previously developed land. (ix) The reference in paragraph 6.42 item 3 to SD11 being “on land adjacent to the urban area”. The proposal for SD11 should not be defined in a way which excludes the urban area and which focuses only on land within the AONB. The proposal should embrace the urban area and the development should maximise the use of previously developed land in the urban area to achieve the provision of 160 dwellings before any consideration is given to the use of land in the AONB. (x) Figure 10 Heathfield Area Strategy. This diagram shows SD11 as located within the AONB and beyond the existing settlement. The diagram should not exclude the inclusion of the existing built up area in this location within the scope of SD11. The built up area has the potential and the capacity to be redeveloped and this aim should be the first priority at north west Heathfield. (xi) Key Diagram: the inset for Heathfield. The inset shows Heathfield and Proposal SD11 in the same way that they are shown on Figure 10 and they are not acceptable for the same reason set out at (x) above. 4. We now propose to elaborate on these objections. Piecemeal not comprehensive 5. SD11 takes an opportunistic approach. It utilises substantial areas of greenfield land as the main development areas (and by implication from the SHLAA one existing property simply as a means of access). Although the SHLAA indicates that Site 155/1210 is in multiple ownerships and Site 307/1210 is owned by a company with 7 shareholders, the choice of this location seems to be influenced simply by the fact that these 2 sites were promoted in the SHLAA and so it is assumed they are available. Site 155/1210 is said to be under the control of a housing developer. We are not aware whether the Council has seen the terms of any option or other legal agreement giving such control but, given that the Proposed Submission Core Strategy is a long term strategy to 2030 and its trajectory does not anticipate the site coming forward before 2015/16, little weight can be given to the status of any current contractual arrangements. 6. Any sensible spatial planning approach to the development of this area would not look at the sites promoted in the SHLAA in isolation but would look to see how that development would relate to its local context and how it would relate to the settlement it is intended to form a part of. 7. The site of SD11 is on sloping ground set back behind existing development which separates the site from the rest of Heathfield. Development as proposed will not integrate the development with its local context as required by paragraph 35 of PPS1. Nor will it maximise the opportunities for the site to benefit from clear and easy links to the facilities in the local service centre by non-car modes. 8. A comprehensive approach would look at the whole of the area in this north western part of Heathfield and then seek to identify the land which is most suited to development. It is common sense that this would start by looking at the land with the best links by foot, cycle, and public transport to the rest of the settlement. That is of course the frontage land along Heathfield Road/High Street itself. The frontage land also contains the previously developed land comprising the existing dwellings and their various outbuildings. Whilst the recent revisions to PPP3 have removed garden land from the definition of previously developed land, the footprint of the buildings and their associated driveways and hardstandings clearly have a higher priority for development than a greenfield meadow. 9. The present objectors, as the owners of Lavender Cottage, are willing to make their land available as part of a wider development. The objectors have made this known to the Council since at least August 2010. The principle of redevelopment for more intensive
residential development has already been established on land to the wets (WD/08/0329) and on the adjoining site to the east of Lavender Cottage (WD/2011/0400). Although planning permission was granted for a block of flats (WD/2008/0276), that development has not come forward and the permission has recently had to be renewed. Clearly, the land is available for development, even if the form of development is not at present attractive to the market. We understand that the owner of the adjoining plot at Holmhurst would be prepared to make that site available. Woodhatch is relied on as available in the SHLAA (Site 155/1210 refers). Thus there is already a substantial amount of the frontage land which is available for development. A spatial approach to the planning of this area would look to utilise this developed frontage land, which plainly has development potential, before turning to the undeveloped hinterland to the rear. Unjustified Encroachment into the AONB 10. The Proposed Submission Core Strategy recognises that SD11 lies within the AONB, where there is strict control over new development. Paragraph 22 of PPS7 is clear that major development in the AONB requires “the most rigorous examination” and that such development should only be accepted after assessment of the scope for meeting the need elsewhere. Under the GDMO 2010 “major development” is a development of 10 or more dwellings. Under the Secretary of State’s arrangements for the recovery of appeals on the basis that they are large/controversial, the threshold is 150 residential units. On either basis, a development of 160 dwellings is major development. In any event, the Council has accepted in the SHLAA that “there is a requirement to demonstrate development is essential to meet local needs and that other more suitable sites do not exist elsewhere” (Site 155/1210). The claimed rationale for the use of AONB land in this case is that “no suitable alternative non-AONB location exists”. This is patently incorrect. As already noted, the frontage land is not within the AONB and if the desire is to achieve a development of some 160 dwellings there can be no justification for taking more AONB land than is absolutely necessary when there is non-AONB land in the same location which is available. 11. Whilst it may be doubtful that the frontage land which is known to be available could alone accommodate the full scale of the development sought, the need to encroach into the AONB would be very much reduced if the frontage land was used first. Such an approach would also enable the lower (and least accessible) parts of the meadow to be retained as open land, potentially providing a better buffer with the important woodland at Tilsmore Wood that makes up such a key component of the Wealden character. The need for such a buffer is recognised in the Landscape Character Assessment (Figure 5). In addition, if the Council made it clear that it was promoting the comprehensive development of the area, it is likely that other owners would also wish to make their land available, and the Council may therefore be able to avoid encroaching into the AONB to any material degree. 12. The Council’s claim that 160 dwellings can be provided in the AONB without strategic adverse impact on the landscape is not supported by the evidence base. The capacity of 160 dwellings for SD11 would appear to derive from the assumed capacity of the 2 adjacent SHLAA sites:Site 155/1210 and Site 307/1210. As already noted, the Council’s Landscape Character Assessment shows (Figure 5) that large parts of these SHLAA sites are required to be retained as open space to provide a “landscape buffer” to Tilsmore Wood. If those buffers are to be provided as recommended in the Landscape Character Assessment, the SHLAA sites will not be able to deliver the required capacity, without radical changes to the assumed density, and there has been no assessment of the impact of higher density development on the AONB and on the landscape setting and character of Tilsmore Wood. The claim therefore that SD11 can be achieved without strategic adverse impact on the AONB is not supported by the evidence base. Using Less Accessible and Less Sustainable Land 13. Similar considerations in terms of minimising the amount of AONB land apply in relation to accessibility issues. The lower parts of the sloping meadow land are not only more remote by simple distance from the footways and bus route along Heathfield Road/High Street, there is also the fact that journeys from home will inevitably be uphill for residents of that area. There will therefore be a disinclination to use non-car modes for accessing local services, even if they might appear to be within walking distance. It must also be doubted whether much of the hinterland is within the preferred 400m distance for access to a bus route. 14. In contrast, the frontage development is already connected to existing pedestrian routes by the adjacent footways and there is only a shallow fall in the land closest to the roadside. Accessibility to the bus route is also much improved. 15. Again, on any sensible measure of accessibility and sustainability, it cannot make sense to use the more remote hinterland in preference to the frontage land. PPS1 is clear at paragraph 35 that new development needs to be integrated into the urban area and address connectivity issues. The choice of a backland location for SD11 when the more accessible frontage land is available is directly contrary to this guidance Inadequate safeguarding of amenities 16. We have already explained why a comprehensive approach needs to be taken to this area. However, if the Council persists in its piecemeal approach then it is apparent that inadequate consideration has been given to the relationship between the retained frontage properties and the new development to the rear. The existing development is at a very low density and has the established character of a mature residential area, with individual dwellings in spacious plots. 17. The SHLAA indicates a proposed density for the new development of some 40 dwellings per hectare for Site 155/120. This will be substantially different in character and could only be achieved by ensuring a substantial buffer between the 2 very different forms of development. However, this would push the new development further into the AONB and would further separate the new development from the settlement of which it is intended to form a part. Again, there would be a conflict with the advice in PPS1 on integrating the development with the urban area. Soundness Tests 18. It is clear from the objections set out above that the proposals for SD11 are not founded on a robust and credible evidence base, cannot be shown to be the most appropriate strategy when considered against the reasonable alternatives, and are not consistent with national policy in PPS1, PPS3, and PPS7 in several important respects. They therefore fail 2 of the key tests of soundness as set out at paragraph 4.52 of PPS12. Legal Tests 19. These objections also
have the consequence that the Council's failure to properly consider reasonable alternatives to its proposals at north west Heathfield, and in particular to consider the alternative of an area of growth in this location planned on a comprehensive basis and focused on maximising the use of previously developed land and minimising the use of land within the AONB, has the consequence that the Sustainability Appraisal/Strategic Environmental Assessment that accompanies the Core Strategy is legally deficient and the Core Strategy is consequently not legally compliant with the requirements of either Regulation 5(1) of the Environmental Assessment of Plans and Programmes Regulations 2004 or with the requirements of s.19(5) and s.20(2) Planning & Compulsory Purchase Act 2004. In addition, the same failings, together with the lack of a credible and robust evidence base to support those proposals and the conflicts with national policy mean that the Core Strategy is not “sound” as required by s.20(5)(b) PCPA 2004. 20. The SA/SEA considers, in broad terms, alternative locations for growth at Heathfield as between the north east, north west, and west of the town. However, what it fails to do is to look at reasonable alternatives within the selected north west location. It is no answer for the Council to suggest that this level of detail is a matter for a later DPD because the Core Strategy is already spatially specific that the location of north west Heathfield is an “urban extension” (i.e. an addition) and that it is “within the AONB” (i.e. outside the settlement boundary. The same spatial approach is shown on Figure 10 and on the Inset for the Key Diagram. The Council is not, therefore, able to avoid grappling with the spatial implications of this choice as part of the Core Strategy and testing it against reasonable alternatives. However, it is clear that this is not an exercise that has been attempted in the SA/SEA. 21. The Council will be well aware from the recent decision in Save Historic Newmarket Ltd v Forest Heath District Council [2011] EWHC 606 (Admin) that a failure in the SA/SEA to give proper consideration to identification and assessment of reasonable alternatives is likely to result in a quashing of the relevant parts of the Core Strategy. Conclusion 22. For all of these reasons the objectors strongly suggest that neither the Council nor the Inspector should endorse the present proposals for SD11. What is required is a fundamental rethink to achieve an integrated, sustainable and accessible development which minimises the impact on the AONB and provides a comprehensive spatial approach to the development of this area. Essentially this requires the focus to shift from the “easy target” of greenfield meadows to a more considered approach, giving priority to the previously developed frontage land, and only considering the AONB hinterland to the minimum extent necessary to achieve the required dwelling numbers.

Details of Changes to be Made:

WCS4: If the location and description of SD11 is changed on Figure 10 to remove the red/pink notation and replace it by a red dwelling house symbol located within the urban area to the immediate north of the A265, and replace the text annotation by the words “Comprehensive development area at north west Heathfield (SD11) (residential provision)” and if the location and description of SD11 is changed on the Heathfield Inset of the Key Diagram with a version of Figure 10 revised to remove the red/pink notation and replace it by a red dwelling house symbol located within the urban area to the immediate north of the A265, and replace the text annotation by the words “Comprehensive development area at north west Heathfield (SD11) (residential provision)”, no change is necessary.

Details of Reasons for Soundness/ Legal Compliance:

Greater Clarity is required regarding the development area SD3 North of Hailsham. The plan appears to show some potential for development north of New Rd, although is is very vague. To development the best sustainable and comprehensive development north of Hailsham at this sale and to ensure the non isolation of the development at the hospital site Park Farm should be included to enable the comprehensive master planning of the area. In this regard we object to the allocation of SD2 land east of Hailsham as this dispersed development objective will not deliver the best sustainable long term master planning of the area or ensure its deliverability over the plan period. These 600 dwellings should be re distributed onto Park Farm north of New Rd as part of the Master planning of SD3.

Details of Changes to be Made:

Identify SD3 to include land at Park farm north of New Rd North Hailsham for an additional 600 dwellings ie 1300 in total.

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<tr>
<td>Person ID</td>
<td>Mes Gribble 106087</td>
</tr>
<tr>
<td>Agent ID</td>
<td>Mr Courtley 102476</td>
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</table>

WCS4 Strategic Policy 4 Development Areas

Sound ☑ Yes ☐ No ☑ Justified ☑ Effective ☑ Consistent with national policy Legally Compliant ☑ Yes ☐ No

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Details of Reasons for Soundness/ Legal Compliance:

Greater Clarity is required regarding the development area SD3 North of Hailsham. The plan appears to show some potential for development north of New Rd, although is is very vague. To development the best sustainable and comprehensive development north of Hailsham at this sale and to ensure the non isolation of the development at the hospital site Park Farm should be included to enable the comprehensive master planning of the area. In this regard we object to the allocation of SD2 land east of Hailsham as this dispersed development objective will not deliver the best sustainable long term master planning of the area or ensure its deliverability over the plan period. These 600 dwellings should be re distributed onto Park Farm north of New Rd as part of the Master planning of SD3.

Details of Changes to be Made:

Identify SD3 to include land at Park farm north of New Rd North Hailsham for an additional 600 dwellings ie 1300 in total.
The Core Strategy is sound and sets out a justified and effective land use strategy for the Polegate area which is consistent with national planning policy. Policy WCS4, Strategic Development Areas, lists as Location SD4 'Land at South Polegate and East Willingdon'. Chapter 6, paragraphs 6.21 to 6.32 and Figure 8 (pages 43-46) show a clear and suitable set of proposals. There is to be no development west of Polegate; housing is proposed to be located in an urban extension south of Polegate and east of Willingdon (Hindslands and Mornings Mill). Paragraph 6.27 of the Core Strategy states: A site was allocated in the 2005 Non Statutory Wealden Local Plan for an urban extension to the north west of Polegate, in the vicinity of Honey Farm. However, this proposal was dependent upon the provision of the Folkington Link and other community infrastructure to enable the integration of development into the town. No such infrastructure has been provided or is known to be planned. Since this allocation the South Downs has achieved National Park status and the adjacent Wootton Manor has formally been included in the English Heritage register of Historic Parks and Gardens. This site has been re-assessed as part of SHLAA and is no longer considered suitable for housing. Figure 8 shows that the land west of Polegate north of the railway line will stay as open countryside adjacent to the National Park. Paragraph 6.27 of the Core Strategy is strongly supported. The Hone Farm or West of Polegate (Pelham Homes) site was included in the Non-Statutory Local Plan in 2004 but that Plan was never subject to a public inquiry. Those affected by the Honey Farm site were not permitted in 2004-05 to oppose it by advancing a different location for the housing, as the opportunity to propose a different location was stated then to be given by the Local Development Framework process in 2005-07. That was delayed and this stage has only now been reached with this Core Strategy. The overwhelming arguments against the Honey Farm location have now been accepted by the District Council. These arguments are: The Honey Farm location would be in isolated development cut off by the A27 trunk road - the 'Folkington Link' no longer being in the trunk road programme; Foot and cycle access to the Honest Farm site would be permanently by footbridges and alleyways directly affecting residents in the Brookside Avenue area of Polegate; The Honey Farm location could not be integrated into the community of Polegate and would be a separate settlement; The setting of the South Downs National Park would be harmed; The setting of the adjacent historic property Wooton Manor, its park and garden would be damaged. The Core Strategy is justified in rejecting the Honey Farm location. The proposed housing location at Hindsland and Morning Mill is sound and justified. If that housing location does not prove to be the best site on further study, the preferred location for housing in the Polegate Town Council Masterplan should be chosen. This is the area north of Polegate and south of the A27 Bypass which is also considered suitable in the 2010 Strategic Housing Land Availability Assessment.

Details of Changes to be Made:
**Details of Reasons for Soundess/ Legal Complaince:**

The Core Strategy is sound and sets out a justified and effective land use strategy for the Polegate area which is consistent with national planning policy. Policy WCS4, Strategic Development Areas, lists as Location SD4 'Land at South Polegate and East Willingdon'. Chapter 6, paragraphs 6.21 to 6.32 and Figure 8 (pages 43-46) show a clear and suitable set of proposals. There is to be no development west of Polegate; housing is proposed to be located in an urban extension south of Polegate and east of Willingdon (Hindslands and Mornings Mill). Paragraph 6.27 of the Core Strategy states: A site was allocated in the 2005 Non Statutory Wealden Local Plan for an urban extension to the north west of Polegate, in the vicinity of Honey Farm. However, this proposal was dependent upon the provision of the Folkington Link and other community infrastructure to enable the integration of development into the town. No such infrastructure has been provided or is known to be planned. Since this allocation the South Downs has achieved National Park status and the adjacent Wootton Manor has formally been included in the English Heritage register of Historic Parks and Gardens. This site has been re-assessed as part of SHLAA and is no longer considered suitable for housing. Paragraph 6.27 of the Core Strategy is strongly supported. The Honey Farm or West of Polegate (Pelham Homes) site was included in the Non-Statutory Local Plan in 2004 but that Plan was never subject to a public inquiry. Those affected by the Honey Farm site were not permitted in 2004-05 to oppose it by advancing a different location for the housing, as the opportunity to propose a different location was stated then to be given by the Local Development Framework process in 2005-07. That was delayed and this stage has only now been reached with this Core Strategy. The overwhelming arguments against the Honey Farm location have now been accepted by the District Council. These arguments are: The Honey Farm location would be in isolated development cut off by the A27 trunk road - the 'Folkington Link' no longer being in the trunk road programme; Foot and cycle access to the Honey Farm site would be permanently by footbridges and alleyways directly affecting residents in the Brookside Avenue area of Polegate; The Honey Farm location could not be integrated into the community of Polegate and would be a separate settlement; The setting of the South Downs National Park would be harmed; The setting of the adjacent historic property Wootton Manor, its park and garden would be damaged. The Core Strategy is justified in rejecting the Honey Farm location. The proposed housing location at Hindsland and Morning Mill is sound and justified. If that housing location does not prove to be the best site on further study, the preferred location for housing in the Polegate Town Council Masterplan should be chosen. This is the area north of Polegate and south of the A27 Bypass which is also considered suitable in the 2010 Strategic Housing Land Availability Assessment.

**Details of Changes to be Made:**

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<tr>
<td>Person ID</td>
<td>Mr Nichols</td>
</tr>
<tr>
<td>Agent ID</td>
<td>Eastbourne Borough Council</td>
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| Sound               | ☐ Yes ☐ No ☐ Justified ☐ Effective ☐ Consistent with national policy |
| Legally Compliant   | ☐ Yes ☐ No |

**Details of Reasons for Soundess/ Legal Complaince:**

The approach set out in Policy WCS4, which identifies a series of Strategic Development Areas is supported in principle. SD4, SD5, SD6 and SD7 all have the potential to assist Eastbourne in achieving its full economic potential. It is, however important to ensure that a green gap is incorporated into the development proposals for SD6: Land at East and South East of Stone Cross to ensure that the distinct identities of Stone Cross and Eastbourne are retained and to prevent the settlements from coalescing.
Details of Reasons for Soundess/ Legal Complaince:
I make reference to the proposed development in Ridgewood, my understanding is new housing should be on Brown Field land, not Green Field Land which is Ridgewood Farm. Its really disgraceful that Ridgewood has been thrown to the wolves, this is the 3rd Farm that will be built on plus Pipers Field and now Sandpits that was also Agricultural land. If this takes place we will lose all our lovely hedges, the wildlife, which we have plenty. This makes me so angry that all this would be lost for profit. I would like it put on record my objections, I know my neighbours all feel the same.

Details of Changes to be Made:

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Details of Reasons for Soundess/ Legal Complaince:
The First Draft Local Plan included proposals for 1000 homes (HA2) on land north of the A271 and east of Park Road. Additionally a Lower Horsebridge/Hellingly Bypass (TR5) was proposed, essentially a prerequisite for the housing. The Local Plan was submitted for public consultation in 2003 and a large number of objections to the policy TR5 were registered, see GR0001.350 - the planning officers response for members consideration. At the meeting of the Wealden Local Plan Review Special Committee, held on 26th February 2004, the members of the planning committee endorsed the officers recommendations to delete policy TR5. The members approved an allocation of 400 homes at Hellingly Hospital (part of HA2), this was in spite of advice (which they had sought) from the Highways Authority that no more than 200 homes were acceptable following the abandonment of policy TR5. Subsequently an application, WD/2006/2440/MEA – Land north of Hailsham, east of Park Road and south of New Road, was received from a ‘developer’. This being the balance of HA2 site. The application was for 550 homes. This was refused on the 9th November 2006 at the Development Control South sub-committee meeting on the advice of officers of the council and the Hghways Authority (Agenda item 15 refers). Moving on. The core Infrastructure Position Statement, 2009, said “Further growth of the town would be likely to necessitate the provision of a Hellingly/Lower Horsebridge Bypass as part of overcoming the current deficiencies of the A271”. However, no specific mention of the bypass is included in Core Structure Infrastructure Delivery Plan (Feb.2011). Rather there are non-specific references to the A271 such as ‘severance issues’, shades of the Honey Farm inquiry ! In the light of the site’s planning history the planning inspector may wish to ask Wealden's representatives why SD3 forms part of the core submission.

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<th>Legally Compliant</th>
<th>Details of Reasons for Soundness/ Legal Compliance:</th>
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<td>89</td>
<td>☐ Yes</td>
<td>☐ Yes</td>
<td>The principle of identifying Strategic Development Areas is supported. However, the Council has not identified or sought to justify what constitutes such an SDA - certainly in terms of numbers of additional dwellings involved. Indeed, it appears that SDL12 comprises a proposal for just 20 units, based upon the information provided in policy WCS6. whilst there is no objection to the development of this land, it is submitted that a proposal relating to 20 dwellings out of total figure 9,600 cannot be described as &quot;strategic&quot;. Nevertheless, and in the context of objections to policies SPO3, WCS1 and WCS2 it is requested that a further strategic development area be listed in policy WCS4. This should comprise SD13 and be described as &quot;Land west of Mayfield.&quot; Mayfield has a range of facilities: indeed, it is classified as a Local Service Centre and is thus larger than the neighbourhood centres. As some of these, such as Maresfield, Ripe and Selmeston are identified for development in policy WCS6, then it seems logical that the larger settlement of Mayfield could - and should - also be identified for development. In these circumstances, therefore, it is requested that the policy is amended by the addition of a further Strategic Development Area (SD13) &quot;Land west of Mayfield.&quot; In order for the District to meet its overall requirement of 17,300 dwellings in the plan period, the Council will also need to consider the identification of other locations within this policy.</td>
</tr>
<tr>
<td>16</td>
<td>☐ Yes</td>
<td>☐ No</td>
<td>I would like to register my strong objection to the building of 700 new homes plus employment floorspace on this greenfield site. Polegate, Willingdon and Eastbourne are soon going to merge into one big, sprawling town. We cannot afford to lose any more of our precious green spaces. Most of all, the traffic on the Eastbourne road is already horrendous. It won't take much more.</td>
</tr>
</tbody>
</table>
Representation ID
45

Person ID Mr Courtley
513493

Agent ID Mr Courtley
102476

WCS4 Strategic Development Areas
Policy 4

Sound □ Yes ☑ No ☑ Justified ☑ Effective ☑ Consistent with national policy

Legally Compliant ☑ Yes □ No

Details of Reasons for Soundess/ Legal Complaince:
Greater clarity is required on the different land areas making up SD7. The potential sites appear clearly split into 3 areas it would be better to define these areas more accurately. This would also aid identifying the release and delivery in the "Managing the release of housing land" section of the CS

Details of Changes to be Made:
Identify the SD7 housing area into either subsections or change the numbering system of Policy WSC4 to pick out the distinct separate areas in SD7

Representation ID
24

Person ID Mr Constable
512369

Agent ID

WCS4 Strategic Development Areas
Policy 4

Sound □ Yes □ No □ Justified □ Effective □ Consistent with national policy

Legally Compliant □ Yes □ No

Details of Reasons for Soundess/ Legal Complaince:
I am writing to register my objection to the proposed residential development south east of Stone Cross. We have lived in Eastbourne for the past 17 years and Borrowdale Close is right on the border with Wealden. Since living here we have seen Wealden build at least 3 developments on Eastbourne's boundary. This is grossly unfair on the residents of Eastbourne. It takes advantage of and places unacceptable pressure on the already stretched local infrastructure and services provided by Eastbourne. The position of this proposed site is at the rear of existing small estate roads which could not cope with this increase in traffic. Enough is enough.

Details of Changes to be Made:
The Core Strategy is sound and sets out a justified and effective land use strategy for the Polegate area which is consistent with national planning policy. Policy WCS4, Strategic Development Areas, lists as Location SD4 'Land at South Polegate and East Willingdon'. Chapter 6, paragraphs 6.21 to 6.32 and Figure 8 (pages 43-46) show a clear and suitable set of proposals. There is to be no development west of Polegate; housing is proposed to be located in an urban extension south of Polegate and east of Willingdon (Hindslands and Mornings Mill). Paragraph 6.27 of the Core Strategy states: A site was allocated in the 2005 Non Statutory Wealden Local Plan for an urban extension to the north west of Polegate, in the vicinity of Honey Farm. However, this proposal was dependent upon the provision of the Folkington Link and other community infrastructure to enable the integration of development into the town. No such infrastructure has been provided or is known to be planned. Since this allocation the South Downs has achieved National Park status and the adjacent Wootton Manor has formally been included in the English Heritage register of Historic Parks and Gardens. This site has been re-assessed as part of SHLAA and is no longer considered suitable for housing. Paragraph 6.27 of the Core Strategy is strongly supported. The overwhelming arguments against the Honey Farm location have now been accepted by the District Council. These arguments are: The Honey Farm location would be in isolated development cut off by the A27 trunk road - the 'Folkington Link' no longer being in the trunk road programme; Foot and cycle access to the Honest Farm site would be permanently by footbridges and alleyways directly affecting residents in the Brookside Avenue area of Polegate; The Honey Farm location could not be integrated into the community of Polegate and would be a separate settlement; The setting of the South Downs National Park would be harmed; The setting of the adjacent historic property Wootton Manor, its park and garden would be damaged. The Core Strategy is justified in rejecting the Honey Farm location. The proposed housing location at Hindsland and Morning Mill is sound and justified.

Details of Changes to be Made:

Yes ☑️ No ☐ Justified ☐ Effective ☐ Consistent with national policy

Legally Compliant ☐ Yes ☑️ No
Representation ID
219
Person ID Sherwood
521466
Agent ID WCS4 Strategic Development Areas

Policy 4

Sound ☑ Yes ☐ No ☐ Justified ☐ Effective ☐ Consistent with national policy

Legally Compliant ☐ Yes ☐ No

Details of Reasons for Soundess/ Legal Complaince:
The Core Strategy is sound and sets out a justified and effective land use strategy for the Polegate area which is consistent with national planning policy. Policy WCS4, Strategic Development Areas, lists as Location SD4 'Land at South Polegate and East Willingdon'. Chapter 6, paragraphs 6.21 to 6.32 and Figure 8 (pages 43-46) show a clear and suitable set of proposals. There is to be no development west of Polegate; housing is proposed to be located in an urban extension south of Polegate and east of Willingdon (Hindslands and Mornings Mill). Paragraph 6.27 of the Core Strategy states: A site was allocated in the 2005 Non Statutory Wealden Local Plan for an urban extension to the north west of Polegate, in the vicinity of Honey Farm. However, this proposal was dependent upon the provision of the Folkington Link and other community infrastructure to enable the integration of development into the town. No such infrastructure has been provided or is known to be planned. Since this allocation the South Downs has achieved National Park status and the adjacent Wootton Manor has formally been included in the English Heritage register of Historic Parks and Gardens. This site has been re-assessed as part of SHLAA and is no longer considered suitable for housing. Paragraph 6.27 of the Core Strategy is strongly supported. The overwhelming arguments against the Honey Farm location have now been accepted by the District Council. These arguments are: The Honey Farm location would be in isolated development cut off by the A27 trunk road - the 'Folkington Link' no longer being in the trunk road programme; Foot and cycle access to the Honest Farm site would be permanently by footbridges and alleyways directly affecting residents in the Brookside Avenue area of Polegate; The Honey Farm location could not be integrated into the community of Polegate and would be a separate settlement; The setting of the South Downs National Park would be harmed; The setting of the adjacent historic property Wooton Manor, its park and garden would be damaged. The Core Strategy is justified in rejecting the Honey Farm location. The proposed housing location at Hindsland and Morning Mill is sound and justified.

Details of Changes to be Made:

Yes

Sound ☑ Yes ☐ No ☐ Justified ☐ Effective ☐ Consistent with national policy

Legally Compliant ☐ Yes ☐ No
### Representation ID

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<td>233</td>
<td>Mrs Tomlinson</td>
<td>WC4 Strategic Development Areas</td>
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<tr>
<td>199</td>
<td>Mr J Trustees of J O Edmonton</td>
<td>Trustee of J O Edmonton Will Trust</td>
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#### Details of Reasons for Soundess/ Legal Complaince:

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#### Details of Reasons for Soundess/ Legal Complaince:

We object to the content of the Policy as drafted on the basis that it has not been shown to be justified, effective or consistent with national policy.

#### Details of Changes to be Made:
The Core Strategy is sound and sets out a justified and effective land use strategy for the Polegate area which is consistent with national planning policy. Policy WCS4, Strategic Development Areas, lists as Location SD4 'Land at South Polegate and East Willingdon'. Chapter 6, paragraphs 6.21 to 6.32 and Figure 8 (pages 43-46) show a clear and suitable set of proposals. There is to be no development west of Polegate; housing is proposed to be located in an urban extension south of Polegate and east of Willingdon (Hindslands and Mornings Mill). Paragraph 6.27 of the Core Strategy states: A site was allocated in the 2005 Non Statutory Wealden Local Plan for an urban extension to the north west of Polegate, in the vicinity of Honey Farm. However, this proposal was dependent upon the provision of the Folkington Link and other community infrastructure to enable the integration of development into the town. No such infrastructure has been provided or is known to be planned. Since this allocation the South Downs has achieved National Park status and the adjacent Wootton Manor has formally been included in the English Heritage register of Historic Parks and Gardens. This site has been re-assessed as part of SHLAA and is no longer considered suitable for housing. Figure 8 shows that the land west of Polegate north of the railway line will stay as open countryside adjacent to the National Park. Paragraph 6.27 of the Core Strategy is strongly supported. The Hone Farm or West of Polegate (Pelham Homes) site was included in the Non-Statutory Local Plan in 2004 but that Plan was never subject to a public inquiry. Those affected by the Honey Farm site were not permitted in 2004-05 to oppose it by advancing a different location for the housing, as the opportunity to propose a different location was stated then to be given by the Local Development Framework process in 2005-07. That was delayed and this stage has only now been reached with this Core Strategy. The overwhelming arguments against the Honey Farm location have now been accepted by the District Council. These arguments are: The Honey Farm location would be in isolated development cut off by the A27 trunk road - the 'Folkington Link' no longer being in the trunk road programme; Foot and cycle access to the Honest Farm site would be permanently by footbridges and alleyways directly affecting residents in the Brookside Avenue area of Polegate; The Honey Farm location could not be integrated into the community of Polegate and would be a separate settlement; The setting of the South Downs National Park would be harmed; The setting of the adjacent historic property Wooton Manor, its park and garden would be damaged. The Core Strategy is justified in rejecting the Honey Farm location. The proposed housing location at Hindsland and Morning Mill is sound and justified. If that housing location does not prove to be the best site on further study, the preferred location for housing in the Polegate Town Council Masterplan should be chosen. This is the area north of Polegate and south of the A27 Bypass which is also considered suitable in the 2010 Strategic Housing Land Availability Assessment.

Details of Changes to be Made:

Yes  Sound  ☑ Yes  ☐ No  ☐ Justified  ☐ Effective  ☐ Consistent with national policy
Legally Compliant  ☐ Yes  ☐ No
Details of Reasons for Soundess/ Legal Complaince:

At the meeting of the Planning Committee South held on the 3rd February 2011 the planning officers advised the members to endorse supplementary agreements to amend the section 106 agreements entered into by the developers of the Hellingly Hospital Site and the Welbury/Woodholm sites. The amendments sought to remove the obligations for: 1. financial contributions towards the acquisition of land for (a) secondary school 2. financial contributions towards the provision of additional secondary school places 3. financial contributions towards the acquisition of land for (a) primary school. The members refused to accept the recommendations. Probably not out of concern for the impact on educational provision in the Hailsham/ Hellingly area but because striking out these obligations blows one hole in the big development/single developer strategy adopted by Wealden to meet the requirements of target based planning. The planning inspector may be minded to explore with WDC's planning officers and the LEA the reasons for their advice and the precedent set for other developers; of special concern are the educational, health centre and library/alternative obligations attached to WD/2009/2705. Moving to the issue of SD3, developers hold out against what they consider to be historic infrastructure deficit. I understand that S106 agreements are still required over and above (an introduction) of CIL. What, then, will be a credible position for requiring developer contributions for the Hellingly Hospital/SD3 catchment area? On a more general theme the LEA representative at the recent Honey Farm Inquiry characterised his organisation as the 'educational supplier of last resort', this in regard to the negotiations over section 106 agreements for that site. The inspector may wish to ask how a last resort supplier manages the provision of public schooling in the future. The planning inspector may also wish to examine the impact of educational 'choice' not only in regard to S106 agreements but also in respect to traffic generated in the Hellingly Hospital / SD3 c area. Just how many journeys will Four Wheel Drive Fiona and her partner Subsidised Electric Car Eric may during the morning rush hour?

Details of Changes to be Made:
### Summary of all Representations - Proposed Submission Core Strategy Regulation 27 - Report 11th July 2011

<table>
<thead>
<tr>
<th>Representation ID</th>
<th>Person ID</th>
<th>Agent ID</th>
</tr>
</thead>
<tbody>
<tr>
<td>179</td>
<td>521160</td>
<td>WCS4 Strategic Development Areas</td>
</tr>
</tbody>
</table>

#### Details of Reasons for Soundness/ Legal Compliance:

The Core Strategy is sound and sets out a justified and effective land use strategy for the Polegate area which is consistent with national planning policy. Policy WCS4, Strategic Development Areas, lists as Location SD4 'Land at South Polegate and East Willingdon'. Chapter 6, paragraphs 6.21 to 6.32 and Figure 8 (pages 43-46) show a clear and suitable set of proposals. There is to be no development west of Polegate; housing is proposed to be located in an urban extension south of Polegate and east of Willingdon (Hindslands and Mornings Mill). Paragraph 6.27 of the Core Strategy states: A site was allocated in the 2005 Non Statutory Wealden Local Plan for an urban extension to the north west of Polegate, in the vicinity of Honey Farm. However, this proposal was dependent upon the provision of the Folkington Link and other community infrastructure to enable the integration of development into the town. No such infrastructure has been provided or is known to be planned. Since this allocation the South Downs has achieved National Park status and the adjacent Wootton Manor has formally been included in the English Heritage register of Historic Parks and Gardens. This site has been re-assessed as part of SHLAA and is no longer considered suitable for housing. Paragraph 6.27 of the Core Strategy is strongly supported. The overwhelming arguments against the Honey Farm location have now been accepted by the District Council. These arguments are: The Honey Farm location would be in isolated development cut off by the A27 trunk road - the 'Folkington Link' no longer being in the trunk road programme; Foot and cycle access to the Honest Farm site would be permanently by footbridges and alleyways directly affecting residents in the Brookside Avenue area of Polegate; The Honey Farm location could not be integrated into the community of Polegate and would be a separate settlement; The setting of the South Downs National Park would be harmed; The setting of the adjacent historic property Wooton Manor, its park and garden would be damaged. The Core Strategy is justified in rejecting the Honey Farm location. The proposed housing location at Hindsland and Morning Mill is sound and justified.

#### Details of Changes to be Made:

![Yes](Sound) ![Yes](Legally Compliant)

**Sound**

**Legally Compliant**

### Details of Reasons for Soundness/ Legal Compliance:

Object to SD1. Unsound, as set out in detailed objections to this site made to that part of the CS document, it is undeliverable, and undeliverable in the set timescale, and unavailable, and will create major town centre congestion problems. Object to SD2. Unsound, as set out in detailed objections to this site made to that part of the CS document, it is undeliverable, undeliverable in the set timescale set and not sustainable. Object to SD3. Unsound, as set out in detailed objections to this site made to that part of the CS document, it is undeliverable, and undeliverable in the set timescale.

#### Details of Changes to be Made:

Delete SD1 to SD7 and replace with sites that are deliverable and sustainable, as set out in the objectors' detailed objections. Particularly include land at South Maresfield as detailed in objections for WCS6.
Representation ID
739
Person ID Bankhead Agent ID
121788
WCS4 Strategic Development Areas Policy 4
Sound  □ Yes □ No □ Justified □ Effective □ Consistent with national policy
Legally Compliant □ Yes □ No
Details of Reasons for Soundess/ Legal Complaince:
Concerning the space at Hindsland/Mornings Mill farm - Object on grounds of lack of recreational space, secondary schools an traffic conditions.
Details of Changes to be Made:

Representation ID
743
Person ID Mrs Wakefield Agent ID
521802
WCS4 Strategic Development Areas Policy 4
Sound  □ Yes □ No □ Justified □ Effective □ Consistent with national policy
Legally Compliant □ Yes □ No
Details of Reasons for Soundess/ Legal Complaince:
Object to the removal of potential community playing fields. Lack of infrastructure inclding currently over subscribed schools, over crowded roads.
Details of Changes to be Made:

Representation ID
747
Person ID Shrubsole Agent ID
522127
WCS4 Strategic Development Areas Policy 4
Sound  □ Yes □ No □ Justified □ Effective □ Consistent with national policy
Legally Compliant □ Yes □ No
Details of Reasons for Soundess/ Legal Complaince:
We feel that any development of the proposed areas does not serve the Wealden Community \as the areas are so close to Tunbridge Wells. The areas at Benhall Mill Road as detailed in the WDC SHLAA are particularly poorly located in relation to the nearest Wealden settlement. Development of these areas firmly places the burden on Tunbridge Wells to provide services which are already stretched. There are insufficiences in the wast water services to support additional housing and traffic congestion is already a considerable issue. We understand that it is the opinion of the landowner that the cological value of the land behind Benhall Mill Road has declined and that the SNCI status should be removed. It is our opinion that the land has been deliberately neglected to this aim.
Details of Changes to be Made:
Details of Reasons for Soundess/ Legal Complaince:
The Unit is concerned about the identification of a site at Heathfield - SD11- which proposes a large housing site within the AONB which may compromise the integrity of the AONB boundary. The site is bounded on the north by extensive ancient woodland and is the source of several small streams (see attached plan) that feed into the ancient woodland. Development in this location is likely to have significant impacts on the character of the AONB and is not considered appropriate.

Details of Changes to be Made:

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Details of Reasons for Soundess/ Legal Complaince:
No housing should be built in Walshes Road or Palesgate Lane until the road transport problems have been properly addressed, by the building of a by-pass of Jarvis Brook and Rotherfield. An independent study of the effects of increased surface water from proposed development sites on existing residential areas should be undertaken and better surface water drainage planned for Jarvis Brook prior to the building of houses at South East Crowborough (SD10). An area already designated as at risk from flooding.

Details of Changes to be Made:
Details of Reasons for Soundness/ Legal Complaince:
Our first and most paramount concern over any development is the loss of countryside and of wildlife living there. Poor animals and birds do not have any choice in us humans constantly eating away at their living environments, which has already been eroded enormously. We have far fewer plant life and other forms of life due to developments such as the above, and if we carry on the way we are going, even more plants and creatures will become extinct to add to the ones that already have. We wrote, to not avail, with our objections over the 550 homes and an industrial estate being built between Ditton's Corner and the Polegate Bypass. Unfortunately, building has already started there. Hopefully this letter will make a difference. As well as the loss of plants and wildlife, these building schemes make a huge impact on the people who already live here. Roads are not going to be able to cope with the extra traffic created by any development. The A27 already can't cope with the heavy traffic it already has. Plus the fact, there's too few parking spaces, and the few that we have - like the Co-op Car park has already had houses built on that! Public transport is also a joke. Often there is only standing room on our squashed trains. Our buses are also extremely infrequent. Eastbourne District General Hospital is full to bursting and can't cope with any more patients. The same is true for doctor's surgeries and dentists, who are only taking on private patients now. Schools here are in the same situation. We have therefore made a decision not to support this development for the above reasons.

Details of Changes to be Made:

Details of Reasons for Soundness/ Legal Complaince:
I am writing in protest at the proposal to build seven hundred homes on the Hindsland/Morning Mill Farm site. It appears from the Wealden Housing survey of 2009 that only a small number of new houses are needed and these could be built throughout the Wealden area. Our areas of natural habitat and beauty are being eroded and these areas are benificial for residents and wildlife alike. We do not have the infrastructure to support seven hundred houses, our roads are in appalling repair, our doctors are overworked and there are a shortage of schol places. Another major factor is that the proposed area being built on acts as a flood plane for local housing and as we have seen in recent years our weather is unpredictable and the incidence of flooding is more frequent and devastating. Therefore I strongly oppose the proposal for the building of seven hundred new houses on the aforementioned site.

Details of Changes to be Made:
Representation ID
703
Person ID   Mrs Marchant
Agent ID
WCS4 Strategic Development Areas
Policy 4
Sound  □ Yes  □ No  □ Justified  □ Effective  □ Consistent with national policy
Legally Compliant  □ Yes  □ No

Details of Reasons for Soundess/ Legal Complaince:
I Object to the proposed development to build 220 new homes within an urban extension to the urban area of Stone Cross as we will lose valuable green open space.

Details of Changes to be Made:

Representation ID
723
Person ID   Mr Brundle
Agent ID
WCS4 Strategic Development Areas
Policy 4
Sound  □ Yes  □ No  □ Justified  □ Effective  □ Consistent with national policy
Legally Compliant  □ Yes  □ No

Details of Reasons for Soundess/ Legal Complaince:
I wish to comment regarding the above development plan involving land at Hindsland/Mornings Mill Farm. Flooding takes place during heavy rainfall. Should future development take place on the higher ground, this will result in further flooding in the Broad Road/Oldfield area. The proposed density of building will inevitably result in many more cars in the area. This will result in further car parking issues.

Details of Changes to be Made:

Representation ID
725
Person ID   Mrs Tonkin
Agent ID
WCS4 Strategic Development Areas
Policy 4
Sound  □ Yes  □ No  □ Justified  □ Effective  □ Consistent with national policy
Legally Compliant  □ Yes  □ No

Details of Reasons for Soundess/ Legal Complaince:
SD4 - Not enough school places and health facilities. A22 has not enough capacity and there will be loss of green belt.

Details of Changes to be Made:
Representation ID
713
Person ID  Mr  Bee
520852  The Nevill Estate Company Limited
Agent ID
WCS4 Strategic Development Areas  Policy 4
Sound  ☐ Yes  ☐ No  ☐ Justified  ☐ Effective  ☐ Consistent with national policy
Legally Compliant  ☐ Yes  ☐ No
Details of Reasons for Soundness/ Legal Compliance:
We would like to propose that the brown field site of a WWII underground bunker, be allocated for housing as a readily available alternative to the 'urban extension' adjacent to Tunbridge Wells referred to in WCS6
Details of Changes to be Made:

Representation ID
716
Person ID  Mr & Petch
105474  Meadowbank
Agent ID
WCS4 Strategic Development Areas  Policy 4
Sound  ☐ Yes  ☐ No  ☐ Justified  ☐ Effective  ☐ Consistent with national policy
Legally Compliant  ☐ Yes  ☐ No
Details of Reasons for Soundness/ Legal Compliance:
Parts of Uplands Farm, Rattle Road, Stone Cross should be considered for development as part of the strategic development area, SD6
Details of Changes to be Made:

Representation ID
717
Person ID  Mr  Maunders  Mr J Barnett
521073  521070  Mr Maunders
Agent ID  Charles Maunders Consultancy Ltd
WCS4 Strategic Development Areas  Policy 4
Sound  ☐ Yes  ☑ No  ☐ Justified  ☑ Effective  ☐ Consistent with national policy
Legally Compliant  ☑ Yes  ☐ No
Details of Reasons for Soundness/ Legal Compliance:
Further consideration to alternative sites should be made before allocation of the South East Urban Extension. We would like to propose Brook Farm, High Broom Road, Crowborough as a suitable alternative to development.
Details of Changes to be Made:
All proposed housing allocations should be tested through the publication/ consultation of the Site Allocations DPD before such areas are proposed/ Allocated in the Core Strategy
Representation ID
667
Person ID Mr Farquhar Agent ID
106146
WCS4 Strategic Development Areas Policy 4
Sound ☐ Yes ☐ No ☐ Justified ☐ Effective ☐ Consistent with national policy
Legally Compliant ☐ Yes ☐ No

Details of Reasons for Soundess/ Legal Complaince:
Object to the exclusion of land at Blackness Road, Crowborough from the housing proposals. The area is very sustainable being close to schools and the railway station with little effect on the AONB. Other proposed locations are more prominent and less sustainable. It may be with the review of housing that less housing may be built and smaller schemes with less impact would be considered more favourably than the larger proposals.

Details of Changes to be Made:

Sound ☐ Yes ☐ No ☐ Justified ☐ Effective ☐ Consistent with national policy
Legally Compliant ☐ Yes ☐ No

Representation ID
668
Person ID Mr a Norman Agent ID
106984
WCS4 Strategic Development Areas Policy 4
Sound ☐ Yes ☐ No ☐ Justified ☐ Effective ☐ Consistent with national policy
Legally Compliant ☐ Yes ☐ No

Details of Reasons for Soundess/ Legal Complaince:
Object to development on land adjacent to Tunbridge Wells, in the parish of Frant due to the area being poorly located in relation to the nearest Wealden Settlement. It increases the Tunbridge Wells Urban Fringe and does not serve the Wealden Community where infrastructure would be best placed to serve the Wealden Community. Development places a burden on Tunbridge Wells Services and may affect development in the Tunbridge Wells area. Traffic impact will require upgrades to the roads to the south including at least one bridge over railway lines. Insufficiences in waste water to support additional houses. There is no justification for using a greenfield site with SNCI status before more suitable brownfield sites particularly because it is not a sustainable settlement for Wealden District Council. WDC seem to agree it is unsuitable. Ecological assessments recognise the wildlife value of the whole site but particularly the proposed area for development. The site access will exacerbate the traffic and congestion problems for the road it adjoins adn requires a full traffic study. There is not emergency access and any access for development would affect SNCI status. The proposal is against current planning policies and responsibility is unclear because development crosses county boundaries.

Details of Changes to be Made:

Sound ☐ Yes ☐ No ☐ Justified ☐ Effective ☐ Consistent with national policy
Legally Compliant ☐ Yes ☐ No

Representation ID
669
Person ID Mrs Reed Agent ID
521902
WCS4 Strategic Development Areas Policy 4
Sound ☐ Yes ☐ No ☐ Justified ☐ Effective ☐ Consistent with national policy
Legally Compliant ☐ Yes ☐ No

Details of Reasons for Soundess/ Legal Complaince:
Object to building in the countryside at Mornings Mill Farm when in the future there may not be a need for the houses. Poor location of GP surgeries in the Polegate/Willingdon area. Concern regading the imact of increased traffic generated by new houses on existing road users.

Details of Changes to be Made:
Policy WCS4 identifies the Strategic Development Areas in the District that the Council considers to be critical to the delivery of the overall strategy. SD6 identifies land at East and South East of Stone Cross that includes land north of Rattle Road owned by my client. We support the approach adopted within Policy WCS4 and the importance attached to the identified Strategic Development Areas to deliver housing and employment opportunities and wider services and infrastructure to support the growth of the District. In particular we support the identification of SD6 - it being a logical location to accommodate strategic development given the status of Stone Cross as a Service Centre within the wider settlement hierarchy, its particularly good public transport connections to Langney and Estbourne, its existing level of services, employment opportunities and facilities and its close links with the A22/A27 primary and trunk routes. Indeed, the provision of housing and employment development in the area will, we believe, help to address the economic needs of the south of the District and the wider Sussex Coast sub-region whilst also delivering affordable housing in meaningful numbers and making a positive contribution to the sustainability of Stone Cross and the quality of life for existing and future residents. The South East Plan proposes that approximately 63% of Wealden’s new housing development is located in the Sussex Coast Sub-Region. The draft Core Strategy is in accordance with this as at present approximately 63% of new allocations (excluding rural areas) are within the Sussex Coast Policy Area. Overall therefore, this approach is consistent with policy within the South East Plan. including specific policy for the Sussex Coast Sub-Region and national planning policy (PPS3 paragraphs 36-38) by helping to create mixed and sustainable communities, developing housing and employment in suitable locations offering a range of community facilities with access to jobs and services. The approach also accords with the Government’s housing objectives in PPS3 in particular the approach identified in Paragraphs 10 and 36 of delivering housing developments in suitable locations, which offer a good range of community facilities and with good access to jobs, key services and infrastructure. Further, it is apparent that all of the requirements set out in paragraph 38 of PPS3 for finding the most suitable locations for growth have been carefully applied to the housing and employment land targets, resulting, at least in the south Wealden District area, in a comprehensive, credible and deliverable spatial plan to address the needs of the District. The Council’s SHLAA identified a number of development sites around Stone Cross that are suitable for development and unconstrained by ownership. In addition, development in this location is known to be viable based on the findings of the Strategic Housing Market Assessment. Having regard to all of the above points and when considered against the alternative of less or no development, this approach is considered to be sound. Less or no development at Stone Cross would be at odds with the established national and regional planning policy identified above. It would also fail to reflect the established settlement pattern in the District, would place greater development pressures on other locations in the District and would inevitably fail to achieve the aims of sustaining and enhancing local services, providing homes in parallel with jobs, providing affordable housing and combining growth with recreation and leisure development. Overall therefore, the approach to development within this area is largely justified in line with the requirements of PPS12 as it is founded on a robust and credible evidence base and is the most appropriate strategy when considered against the reasonable alternatives. However, in the context of our comments concerning the overall scale of housing required in the District under Policy WCS1, we consider that the housing provision identified for Stone Cross under supporting text (Figure 5 and at paragraph 6.31) to Policy WCS1 (650 dwellings) should be increased to reflect existing local housing need and the anticipated growth in households during the Core Strategy period.

Details of Changes to be Made:

Yes  No  Justified  Effective  Consistent with national policy
Sound  Yes  No
Legally Compliant  Yes  No
Details of Reasons for Soundess/ Legal Complaince:
I am writing as the freeholder of the property known as Inglenook and part freehold owner of the land to its rear (SLHAA ref: 388/3280) to clarify my position following the identification of the land within Wealden District Council's Proposed Submission Core Strategy as part of a Proposed Strategic Development Area (SD6) The freehold title of the land to the rear of Inglenook is divided between myself and Mr Frederick Bird. I own the ground and subsoil down to 1metre depth and Mr Bird owns the subsoil below 1 metre and airspace above 2.7 metres. Both myself and Mr Bird have no objection to the inclusion of the land within the Proposed Strategic Development Area SD6 and indeed support this as a strategic allocation. In my view, it involves a logical and entirely appropriate extension to Stone Cross that would have minimal impact on the local environment, amenity of local residents and the operation of the surrounding highway system. I also support the extension of Stone Cross itself on the basis that its existing facilities, proximity to wider services and the employment opportunities and location outside of the South downs National Park makes it a sensible option to provide for the development needs of South Wealden District.

Details of Changes to be Made:
Representation ID
679
Person ID  Mr  Beams
519685  Willingdon and Jevington Parish Council
Agent ID
WCS4 Strategic Development Areas  Policy 4
Sound  ☐ Yes  ☐ No  ☐ Justified  ☐ Effective  ☐ Consistent with national policy
Legally Compliant  ☐ Yes  ☐ No
Details of Reasons for Soundess/ Legal Complaince:
SD4: The summary document delares the 'strategy proposes significant growth within Hailsham and Uckfield with additional growth at Stone Cross and Polegate.' The area identified in SD4 includes Hindsland Playing Fields and Morning Mill Farm, which is land in Willingdon and Jevington Parish, and therefore inconsistent with the aim to develop growth at Polegate.

Details of Changes to be Made:

Representation ID
491
Person ID  Ms  Goulden
522120  Batcheller Monkhouse
Agent ID  Mr  Ide
335759  Batcheller Monkhouse
WCS4 Strategic Development Areas  Policy 4
Sound  ☐ Yes  ☑ No  ☑ Justified  ☐ Effective  ☐ Consistent with national policy
Legally Compliant  ☑ Yes  ☐ No
Details of Reasons for Soundess/ Legal Complaince:
The identification of urban extensions is supported in principle. The policy identifies 12 Strategic Development Areas, all of which vary considerably in character. Some Strategic Allocations are challengeable, particularly that under designation SD1 (Uckfield). If these sites do not come forward, the Council has indicated that the Core Strategy will need to be reviewed. However this could interrupt housing supply. A contingency plan is therefore needed.

Details of Changes to be Made:
  o Council to supply explanatory text.

Representation ID
512
Person ID  Ashdown
522134  Natural England
Agent ID
WCS4 Strategic Development Areas  Policy 4
Sound  ☐ Yes  ☐ No  ☐ Justified  ☐ Effective  ☐ Consistent with national policy
Legally Compliant  ☐ Yes  ☐ No
Details of Reasons for Soundess/ Legal Complaince:
Natural England share the concerns of the High Weald AONB Unit with regard to a strategic site being situated within the High Weald north west of Heathfield. We recommend that a full assessment of alternatives is undertaken and that any development coming forward in this area is assessed against the criteria of the High Weald Management Plan.

Details of Changes to be Made:
**Details of Reasons for Soundess/ Legal Complaince:**

The Core Strategy is sound and sets out a justified and effective land use strategy for the Polegate area which is consistent with national planning policy. Policy WCS4, Strategic Development Areas, lists as Location SD4 'Land at South Polegate and East Willingdon'. Chapter 6, paragraphs 6.21 to 6.32 and Figure 8 (pages 43-46) show a clear and suitable set of proposals. There is to be no development west of Polegate; housing is proposed to be located in an urban extension south of Polegate and east of Willingdon (Hindslands and Mornings Mill). Paragraph 6.27 of the Core Strategy states: A site was allocated in the 2005 Non Statutory Wealden Local Plan for an urban extension to the north west of Polegate, in the vicinity of Honey Farm. However, this proposal was dependent upon the provision of the Folkington Link and other community infrastructure to enable the integration of development into the town. No such infrastructure has been provided or is known to be planned. Since this allocation the South Downs has achieved National Park status and the adjacent Wootton Manor has formally been included in the English Heritage register of Historic Parks and Gardens. This site has been re-assessed as part of SHLAA and is no longer considered suitable for housing. Paragraph 6.27 of the Core Strategy is strongly supported. The overwhelming arguments against the Honey Farm location have now been accepted by the District Council. These arguments are: The Honey Farm location would be in isolated development cut off by the A27 trunk road - the 'Folkington Link' no longer being in the trunk road programme; Foot and cycle access to the Honest Farm site would be permanently by footbridges and alleyways directly affecting residents in the Brookside Avenue area of Polegate; The Honey Farm location could not be integrated into the community of Polegate and would be a separate settlement; The setting of the South Downs National Park would be harmed; The setting of the adjacent historic property Wooton Manor, its park and garden would be damaged. The Core Strategy is justified in rejecting the Honey Farm location. The proposed housing location at Hindsland and Morning Mill is sound and justified.

**Details of Changes to be Made:**
Details of Reasons for Soundness/ Legal Compliance:

The Core Strategy is sound and sets out a justified and effective land use strategy for the Polegate area which is consistent with national planning policy. Policy WCS4, Strategic Development Areas, lists as Location SD4 'Land at South Polegate and East Willingdon'. Chapter 6, paragraphs 6.21 to 6.32 and Figure 8 (pages 43-46) show a clear and suitable set of proposals. There is to be no development west of Polegate; housing is proposed to be located in an urban extension south of Polegate and east of Willingdon (Hindslands and Mornings Mill). Paragraph 6.27 of the Core Strategy states: A site was allocated in the 2005 Non Statutory Wealden Local Plan for an urban extension to the north west of Polegate, in the vicinity of Honey Farm. However, this proposal was dependent upon the provision of the Folkington Link and other community infrastructure to enable the integration of development into the town. No such infrastructure has been provided or is known to be planned. Since this allocation the South Downs has achieved National Park status and the adjacent Wootton Manor has formally been included in the English Heritage register of Historic Parks and Gardens. This site has been re-assessed as part of SHLAA and is no longer considered suitable for housing. Paragraph 6.27 of the Core Strategy is strongly supported. The overwhelming arguments against the Honey Farm location have now been accepted by the District Council. These arguments are: The Honey Farm location would be in isolated development cut off by the A27 trunk road - the 'Folkington Link' no longer being in the trunk road programme; Foot and cycle access to the Honest Farm site would be permanently by footbridges and alleyways directly affecting residents in the Brookside Avenue area of Polegate; The Honey Farm location could not be integrated into the community of Polegate and would be a separate settlement; The setting of the South Downs National Park would be harmed; The setting of the adjacent historic property Wootton Manor, its park and garden would be damaged. The Core Strategy is justified in rejecting the Honey Farm location. The proposed housing location at Hindsland and Morning Mill is sound and justified.

Details of Changes to be Made:
Representation ID
533

Person ID  Mr  Edwards
106675

Agent ID
WCS4 Strategic Development Areas
Policy 4

Sound  Yes  No  Justified  Effective  Consistent with national policy
Legally Compliant  Yes  No

Details of Reasons for Soundness/ Legal Complaince:
The Core Strategy is sound and sets out a justified and effective land use strategy for the Polegate area which is consistent with national planning policy. Policy WCS4, Strategic Development Areas, lists as Location SD4 'Land at South Polegate and East Willingdon'. Chapter 6, paragraphs 6.21 to 6.32 and Figure 8 (pages 43-46) show a clear and suitable set of proposals. There is to be no development west of Polegate; housing is proposed to be located in an urban extension south of Polegate and east of Willingdon (Hindslands and Mornings Mill). Paragraph 6.27 of the Core Strategy states: A site was allocated in the 2005 Non Statutory Wealden Local Plan for an urban extension to the north west of Polegate, in the vicinity of Honey Farm. However, this proposal was dependent upon the provision of the Folkington Link and other community infrastructure to enable the integration of development into the town. No such infrastructure has been provided or is known to be planned. Since this allocation the South Downs has achieved National Park status and the adjacent Wootton Manor has formally been included in the English Heritage register of Historic Parks and Gardens. This site has been re-assessed as part of SHLAA and is no longer considered suitable for housing. Paragraph 6.27 of the Core Strategy is strongly supported. The overwhelming arguments against the Honey Farm location have now been accepted by the District Council. These arguments are: The Honey Farm location would be in isolated development cut off by the A27 trunk road - the 'Folkington Link' no longer being in the trunk road programme; Foot and cycle access to the Honest Farm site would be permanently by footbridges and alleyways directly affecting residents in the Brookside Avenue area of Polegate; The Honey Farm location could not be integrated into the community of Polegate and would be a separate settlement; The setting of the South Downs National Park would be harmed; The setting of the adjacent historic property Wooton Manor, its park and garden would be damaged. The Core Strategy is justified in rejecting the Honey Farm location. The proposed housing location at Hindsland and Morning Mill is sound and justified. Polegate area is over-populated as it is.

Details of Changes to be Made:
Details of Reasons for Soundness/ Legal Compliance:
The Core Strategy is sound and sets out a justified and effective land use strategy for the Polegate area which is consistent with national planning policy. Policy WCS4, Strategic Development Areas, lists as Location SD4 'Land at South Polegate and East Willingdon'. Chapter 6, paragraphs 6.21 to 6.32 and Figure 8 (pages 43-46) show a clear and suitable set of proposals. There is to be no development west of Polegate; housing is proposed to be located in an urban extension south of Polegate and east of Willingdon (Hindslands and Mornings Mill). Paragraph 6.27 of the Core Strategy states: A site was allocated in the 2005 Non Statutory Wealden Local Plan for an urban extension to the north west of Polegate, in the vicinity of Honey Farm. However, this proposal was dependent upon the provision of the Folkington Link and other community infrastructure to enable the integration of development into the town. No such infrastructure has been provided or is known to be planned. Since this allocation the South Downs has achieved National Park status and the adjacent Wootton Manor has formally been included in the English Heritage register of Historic Parks and Gardens. This site has been re-assessed as part of SHLAA and is no longer considered suitable for housing. Paragraph 6.27 of the Core Strategy is strongly supported. The overwhelming arguments against the Honey Farm location have now been accepted by the District Council. These arguments are: The Honey Farm location would be in isolated development cut off by the A27 trunk road - the 'Folkington Link' no longer being in the trunk road programme; Foot and cycle access to the Honest Farm site would be permanently by footbridges and alleyways directly affecting residents in the Brookside Avenue area of Polegate; The Honey Farm location could not be integrated into the community of Polegate and would be a separate settlement; The setting of the South Downs National Park would be harmed; The setting of the adjacent historic property Wooton Manor, its park and garden would be damaged. The Core Strategy is justified in rejecting the Honey Farm location. The proposed housing location at Hindsland and Morning Mill is sound and justified.

Details of Changes to be Made:

Details of Reasons for Soundness/ Legal Compliance:
Medical Infrastructure Threatened Para 6.22 refers to the 'limited range of facilities available locally', and states 'a new GP surgery and medical centre has recently been granted planning consent in Willingdon.' This is a change from the original draft wording that the centre would be built and there is now considerable doubt whether it will ever be built at this location. Given that uncertainty the provision of medical infrastructure cannot be sound. Drainage Issues Para 6.28 states 'development will only be allowed it can be accomodated by the existing works, unless an alternative location for the treatment and discharge of waste water is implemented.' There appears to be undue reliance on this infrastructure being provided and if it and other infrastructure is not provided the whole allocation at SD4 fails. There appears no fall back position should this be the case and that will make the whole core strategy unsound in terms of numbers of dwellings to be built.

Details of Changes to be Made:
Details of Reasons for Soundness/ Legal Compliance:
We object to the content of the Policy as drafted on the basis that it has not been shown to be justified, effective or consistent with national policy.

Details of Changes to be Made:

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Details of Reasons for Soundness/ Legal Compliance:
Object to the development at Hindslands/Morning Mill and the amount of traffic generated. Over the years, after the construction of the by-pass, the traffic has steadily risen and future development will mean this will increase. The noise pollution will increase, exacerbated by Tennis week and Airbourne. The two primary schools and secondary school in the area are over-subscribed and this will get worse. I understand that there is no provision for new schools in the development. If we allow developments on this scale there will be no open spaces.

Details of Changes to be Made:
Representations on behalf of Rich Tee Ltd. RPS has been instructed by Rich Tee Ltd. to make representations to Wealden District Council on the Draft Proposed Submission Core Strategy. Policy WCS4- Strategic Development Areas. Rich Tee Ltd. object to parts of policy WCS4. The parts of the policy which relate to Hailsham (SD2: Land at East Hailsham and SD3 Land at North Hailsham), make a significant contribution to meeting the District’s housing needs over the period of the Core Strategy. In their in their current form though, these Strategic Development Areas render the Core Strategy unsound, on the grounds that they are not justified. They are not justified because they are not founded on a robust and credible evidence base and because it is not the most appropriate strategy when considered against the reasonable alternatives. Rich Tee Ltd’s. concerns about the evidence base used to justify the inclusion of SD2 and SD3 within the policy are set out below. Rich Tee Ltd. consider that it is not the most appropriate strategy when considered against reasonable alternatives, for the following reason. Rich Tee Ltd., as the Council will be aware, have been promoting land at Mill Road, Hailsham as being suitable for residential development for a number of years now. Rich Tee Ltd. made representations to this effect to the Council on the Issue and Options Paper in 2007, and the on the Spatial Development Options document in 2009. Rich Tee Ltd. have also ensured that the site has been considered as part of the Strategic Housing Land Availability Assessment (SHLAA) (site no. 216/1310), where in the assessment report it is described as available for housing, and stated that it could yield approximately 190 new dwellings. Rich Tee Ltd. has carried out an extensive range of survey work in relation to the site to demonstrate that an allocation of the site for residential development would be founded on credible and robust evidence base. This evidence base has included: - Highways Appraisal; - Technical Note on Town Centre Traffic Impact; - A Desk Study and Extended Phase 12 Habitat Survey; - Initial screening Odour Assessment and Detailed odour Assessment ; - Urban Design study including masterplan options; and, - Landscape and Visual Assessment. These studies were commissioned in order to address the issues identified relating to the area (15d- Area along Hailsham’s Far Eastern Flank) in the 2007 Issues and Options Paper. Collectively, the studies all demonstrate that the site could be developed without detriment to the site immediate surrounding and wider area. These documents have all been made available to the Local Planning Authority. It should also be re-iterated that unlike the two identified Strategic Development Areas, the site at Mill Road is in single ownership. Notwithstanding this, neither the Proposed Submission Core Strategy, nor any of the supporting documents, explain with any clarity why this site has been discounted as an option for meeting the town’s housing needs. Table 8.9 of the Sustainability Appraisal of the Core Strategy dismisses land to the south east of Hailsham as a broad location for housing due to relatively low land values, potential odour mitigation requirements, poor accessibility to Hailsham Town Centre and lack of public transport provision, all in direct contradiction to Rich Tee Ltd’s. evidence base. Without such an explanation, and in the face of compelling evidence supporting the site at Mill Road, it is considered that the Core Strategy is unsound with policy WCS4 in its current form; the inclusion of Mill Road as part of policy WCS4 is a more appropriate strategy. While the site at Mill Road will not meet the town’s housing needs on its own, it provides a more solid platform upon which a more sustainable strategy for the town can be developed, given the difficulties with the identified Strategic Development Areas. Strategic Development Areas: SD2 Land east of Hailsham. Rich Tee Ltd. object to the identification of land to the east of Hailsham as a Strategic Development Area. The proposal for the Strategic Development Area in its current form and scale would render the Core Strategy unsound on the grounds that it is not founded on a robust and credible evidence base, it is not consistent with national policy and is not the most appropriate strategy when considered against the reasonable alternatives. In general terms, it is recognised that of all the potential sites for an urban extension of Hailsham, land to the east of the town is the more sustainable in terms of proximity to the town centre and it’s services. The site is however in multiple ownerships. There is no evidence in the Submission Document or its accompanying documents to explain how in this legal context 600 homes and ancillary infrastructure envisaged can be delivered, and the site thus fails the deliverability aspect of the effective test. More specifically, there are several problems with accessing this site. Access on to Battle Road would require a significant junction to be created and could send traffic through the Town Centre unless linked to a northern relief road through the SD3 area. As set out in Rich Tee Ltd’s. objections to SD3, there is a clear absence of a robust and credible evidence base to demonstrate that such a relief road is feasible. The alternative is to release traffic directly through the town centre, and this scenario just simply has not been tested in any meaningful way. The 2007 Issues and Options Paper noted that the town centre has considerable problems of

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The site is however in multiple ownerships. There is no evidence in the Submission Document or its accompanying documents to explain how in this legal context 600 homes and ancillary infrastructure envisaged can be delivered, and the site thus fails the deliverability aspect of the effective test. More specifically, there are several problems with accessing this site. Access on to Battle Road would require a significant junction to be created and could send traffic through the Town Centre unless linked to a northern relief road through the SD3 area. As set out in Rich Tee Ltd’s. objections to SD3, there is a clear absence of a robust and credible evidence base to demonstrate that such a relief road is feasible. The alternative is to release traffic directly through the town centre, and this scenario just simply has not been tested in any meaningful way. The 2007 Issues and Options Paper noted that the town centre has considerable problems of
traffic congestion. Like the site at SD3 further details, costs and timings are required before it can be said with any
certainty that this Strategic Development Area can be delivered in terms of accessibility. The site is not the subject
of any specific landscape designations. The area does however provide an attractive rural setting to the town,
extending the rural area as it does close to the edge of the commercial centre. While the upper part of the site is
fairly flat and enclosed to the south, meaning there aren’t any significant views from the town over the Pevensey
Levels, the same cannot be said of the lower part of the site. The land enclosed by Battle Road and Harebeating
Lane is very exposed towards Pevensey Levels, and there are extensive views from Vicarage Lane especially
towards Herstmoncuex and High Weald. The 2007 Issues and Options Paper stated that these views need to be
maintained as intrinsic to the character of the town, as should views of St. Mary’s Church from eastern vistas
including Harebeating Lane. The 2007 Paper also noted that there are remnants of an enclosed medieval field
system (Sallions) and that any development would need to integrate these historic landscape features. These
factors all reduce the net developable area of the site and place constraints on the effective delivery of integrated
services and infrastructure, and there is no evidence to demonstrate how this can be satisfactorily addressed. It is
also noted that the site is in close proximity to Hailsham North Sewage Treatment Works The access road through
the northern part of the Strategic Development Area is used by sludge lorries, and the 2007 Issues and Options
Paper stated that the potential expansion of this area for residential use would require the resolution of the odour
problem. There is no evidence that this problem is close to resolution, thus large parts of the Strategic
Development Area could be sterilised. In terms of ecology, the site is the closest possible development option to
the Pevensey Levels Ramsar site and is within its catchment, and no evidence appears to have been presented
with the consultation documents as to how the impact of development could be successfully mitigated. Policy
WCS4 – Strategic Development Areas: SD3 land north of Hailsham Rich Tee Ltd. object to the identification of
land to the north of Hailsham as a Strategic Development Area. The proposal for the Strategic Development Area
in its current form would render the Core Strategy unsound on the grounds that it is not founded on a robust and
credible evidence base, it is not consistent with national policy and is not the most appropriate strategy when
considered against the reasonable alternatives. In general terms, while the site is not the subject of any statutory
or non statutory landscape designations, the site is relatively flat and represents a deep incursion into the open
countryside which would reduce the quality of the rural gap between Hailsham the development at Hellingly
Hospital and other surrounding settlements, to the detriment of the wider area. The Hailsham and Hellingly
Masterplan notes that development to the north of Hailsham, would elongate the town and result in a less
accessible development which is likely to result in more car journeys. If the Hailsham and Hellingly Master Plan
observes that the land to the east of Battle Road is considered to be more sustainable in view of the proximity of
the site to the town centre and its services, it follows that this site is less sustainable than the Mill Road site as
well. The SHLAA summary of the part of the Strategic Development Area to the east of the Cuckoo Trail
acknowledges that care will have to be taken to avoid urban coalescence between the two settlements. More
specifically, Rich Tee Ltd. have concerns about the impact of the scale of development proposed on the local
highway network. It has long been acknowledged that large scale development in this location would require a
relief road/access road to the A22 providing relief for the existing A271. The 2007 Issues and Option Paper noted
that the Boship roundabout is approaching capacity, and that various alignment options for a relief road had been
considered at that stage. Some unspecified options, the document noted, had negative impacts on the Cuckmere
valley in terms of increased flood risk and impact on habitat, and another option would have resulted in the
severance of the school and the village hall from the rest of Hellingly village. Four years on from the publication of
this document, it appears that little progress has been made in addressing the issue as to how development on the
scale proposed in this location can be delivered without detriment to the existing highway network. It is noted from
the Infrastructure Delivery Plan (BP11) that that these issues are identified as critical requirements for the growth
of Hailsham and Hellingly, and that further assessments are required to physical and financial deliverability and
emphasises that development is contingent on the delivery of this infrastructure. It is understood that the Strategic
Development Area comprises two separate sites either side of Park Road, both of which are in different
ownerships, which will only complicate the delivery of the required highway improvements. This emphasises the
practical problems in delivering infrastructure which would be a key part of this particular Strategic Development
Area. Until the feasibility of the highway improvements required has been fully established, it cannot be said that
the Core Strategy has been founded on a robust and credible evidence base, and it is considered premature to
rely on this site to the extent that the Core Strategy does, in order to deliver the towns housing needs, on the basis
of the current evidence base. The 2007 Issues and Options Paper also highlighted several issues in relation to
Landscape and Biodiversity that have not been satisfactorily addressed in the Proposed Submission Core Strategy
and the supporting documentation. It was noted that the setting of the Cuckmere River limits the scale of
expansion to the north. Figure 7 of the proposed Submission Core Strategy gives no indication as to how this has
been addressed. In terms of cultural heritage, no evidence has been presented which shows how the development
would affect the setting of Hellingly, most of which is in a conservation area, and which contains a number of listed
buildings. Paragraph 15.12 of the Green Infrastructure Background Paper (BP6) emphasises the importance of
conserving and where possible improving the setting of Wealden’s designated cultural heritage including
landscape improvements. How this will be achieved in this case has not been demonstrated.

Details of Changes to be Made:
Details of Reasons for Soundess/ Legal Complaince:

Separation of Polegate and Willingdon Para 2.2 states that 'each settlement has its own unique characteristics and functions, depending on its location and historical influences.' This wording follows on from the wording in Chapter 17 of the Non Statutory Wealden Local Plan. However the Development of the SD4 area could either force two settlements (Willingdon and Polgate) into one, thus destroying the unique characteristics referred to or result in a remote settlement in Willingdon if the important green frontage to the A2270 is to be preserved. The vital green gap on that side of the A2270 between the built up areas of Willindon and Polegate is likely to be lost. Para 7.23 states 'in order to maximize the benefits, policy places the emphasis on the creation and maintenance of linkages between green spaces.' Changing the Character of Willingdon Para 2.21 states 'the strategy is not seeking to change the character of Wealden.' It is argued that development of the SD4 area will either force two settlements (the village of Willingdon and the town of Polegate) into one thus changing the character of the area or alternatively a remote and separate settlement will be created. It could also lead to a change in the character of Willingdon with encouragement of extensive business use where none currently exists. Community facilities are proposed in an area sufficiently remote from most of the village to need transport to access it. Development of Recreational Land Planning Policy Guidance 17: Planning for open space, sport and recreation para 17.10 states 'existing open space, sports and recreational buildings and land should not be built on unless an assessment has been undertaken which has clearly shown the open space or the buildings and land to be surplus to requirements.' The Core Strategy refers frequently to the lack of suitable recreational facilities so even if an assessment had been carried out the land is not surplus, so the proposal to develop existing land (Hindslands) (SD4) is inconsistent. Chapter 17 paragraphy 17.1 of the Wealden non statutory plan states that "Polegate and Willingdon are adjacent but distinctly different communities located at the foot of the South Downs to the north of Eastbourne." However, one outcome of the proposed Core Strategy is that the two settlements could merge for the first time on the east side of the A2270. Traffic Congestion Para 6.23 states 'the A2270 running through the urban area is still heavily congested and traffic flows on the strategic road network are very high.' Numerous references are made throughout the strategy to the need for infrastructure, and 5.16 states 'development at SD4 will be phased to commence from 2019 to enable integration of development in relation to transport infrastructure requirements and interventions in South Wealden.' The impact of this number of additional vehicles will have a very bad effect on the already heavily congested road network of the A2270 and surrounding roads in Lower Willingdon. With the very limited changes proposed to junctions the policy is unsound and needs further examination. It is not understood how a quality bus service would improve matters. These proposals were not properly examined by the District Council because it was only a thte last moment that a decision was made to promote SD4 and the very late arrival of the SWETS document. Concerns about School Places Concern is expressed about whether adequate provision has been made for additional places at the primary and secondary schools in the local vicinity of SD4. Extensions to the existing school which are in heavily built up areas with heavy congestion on the roads is not the answer. The strategy appears to be unsound.

Details of Changes to be Made:
Details of Reasons for Soundess/ Legal Complaince:
The exit from the proposed Ridgewood Farm (346/1410) development has not been mentioned. Out on to an already busy bypass or out on to Lewes Road which would be difficult.

Details of Changes to be Made:

Details of Reasons for Soundess/ Legal Complaince:
Object to the development South East of Stone Cross

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WCS4 Strategic Development Areas: Policy 4

**Sound**
- Yes [ ]
- No [ ]
- Justified [ ]
- Effective [ ]
- Consistent with national policy [ ]

**Legally Compliant**
- Yes [ ]
- No [ ]

**Details of Reasons for Soundess/ Legal Complaince:**
Object to the development South East of Stone Cross

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<td>Mr. George</td>
<td>538524</td>
<td>Langney</td>
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WCS4 Strategic Development Areas: Policy 4

**Details of Reasons for Soundness/Legal Compliance:**
Object to the development South East of Stone Cross

**Details of Changes to be Made:**

<table>
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<tr>
<th>Representation ID</th>
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WCS4 Strategic Development Areas: Policy 4

**Details of Reasons for Soundness/Legal Compliance:**
Object to the development South East of Stone Cross

**Details of Changes to be Made:**
Representation ID
650
Person ID  Mr a Gillam  Agent ID  Langney
523965  538524
WCS4 Strategic Development Areas Policy 4
Sound  ☐ Yes  ☐ No  ☐ Justified  ☐ Effective  ☐ Consistent with national policy
Legally Compliant  ☐ Yes  ☐ No
Details of Reasons for Soundess/ Legal Complaince:
Object to the development South East of Stone Cross
Details of Changes to be Made:

Representation ID
651
Person ID  Mr Godfrey  Agent ID  Langney
523969  538524
WCS4 Strategic Development Areas Policy 4
Sound  ☐ Yes  ☐ No  ☐ Justified  ☐ Effective  ☐ Consistent with national policy
Legally Compliant  ☐ Yes  ☐ No
Details of Reasons for Soundess/ Legal Complaince:
Object to the development South East of Stone Cross
Details of Changes to be Made:

Representation ID
652
Person ID  Mr a Hyde  Agent ID  Langney
523972  538524
WCS4 Strategic Development Areas Policy 4
Sound  ☐ Yes  ☐ No  ☐ Justified  ☐ Effective  ☐ Consistent with national policy
Legally Compliant  ☐ Yes  ☐ No
Details of Reasons for Soundess/ Legal Complaince:
Object to the development South East of Stone Cross
Details of Changes to be Made:

Representation ID
653
Person ID  Mr a Isaac  Agent ID  Langney
523975  538524
WCS4 Strategic Development Areas Policy 4
Sound  ☐ Yes  ☐ No  ☐ Justified  ☐ Effective  ☐ Consistent with national policy
Legally Compliant  ☐ Yes  ☐ No
Details of Reasons for Soundess/ Legal Complaince:
Object to the development South East of Stone Cross
Details of Changes to be Made:
Representation ID
654
Person ID  Mrs Marchant
514337
Agent ID  Langney
538524
WCS4 Strategic Development Areas
Policy 4
Sound  □ Yes □ No □ Justified □ Effective □ Consistent with national policy
Legally Compliant  □ Yes □ No
Details of Reasons for Soundess/ Legal Complaince:
Object to the development South East of Stone Cross
Details of Changes to be Made:

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Representation ID
655
Person ID  Mr a O’Gorman
523978
Agent ID  Langney
538524
WCS4 Strategic Development Areas
Policy 4
Sound  □ Yes □ No □ Justified □ Effective □ Consistent with national policy
Legally Compliant  □ Yes □ No
Details of Reasons for Soundess/ Legal Complaince:
Object to the development South East of Stone Cross
Details of Changes to be Made:

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Representation ID
656
Person ID  Mr a Parmenter
523981
Agent ID  Langney
538524
WCS4 Strategic Development Areas
Policy 4
Sound  □ Yes □ No □ Justified □ Effective □ Consistent with national policy
Legally Compliant  □ Yes □ No
Details of Reasons for Soundess/ Legal Complaince:
Object to the development South East of Stone Cross
Details of Changes to be Made:

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Representation ID
657
Person ID  Mr a Penniket
523983
Agent ID  Langney
538524
WCS4 Strategic Development Areas
Policy 4
Sound  □ Yes □ No □ Justified □ Effective □ Consistent with national policy
Legally Compliant  □ Yes □ No
Details of Reasons for Soundess/ Legal Complaince:
Object to the development South East of Stone Cross
Details of Changes to be Made:
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Representation ID
662

Person ID  Mr  Lloyd MP
521924

Agent ID  Agent ID
WCS4 Strategic Policy 4 Development Areas

Sound  ☐ Yes  ☐ No  ☐ Justified  ☐ Effective  ☐ Consistent with national policy

Legally Compliant  ☐ Yes  ☐ No

Details of Reasons for Soundess/ Legal Complaince:
I am writing to lodge my objection to the proposals in the Wealden Development Plan to allocate housing development for land south of the railway line adjacent to Eastbourne Borough boundary. Many of my constituents have contacted me on this matter. They are concerned about the effect of building around the green belt that borders on the Borough boundary. In addition to their desire to protect the green belt, they are also worried about the effect on local services in Eastbourne. I share their concern that there is already pressure on existing schools and health services in Eastbourne. The road and public transport infrastructure is already stretched. In view of the overwhelming concerns and objections from my constituents I urge that any reference to developments on the green belt around the Eastbourne Borough boundary be removed.

Details of Changes to be Made:

Representation ID
1157

Person ID  Mar  Mark Stephen Limited
533827

Agent ID  Mr  Hughes
533824

Agent ID  Agent ID
WCS4 Strategic Policy 4 Development Areas

Sound  ☐ Yes  ☑ No  ☑ Justified  ☐ Effective  ☐ Consistent with national policy

Legally Compliant  ☑ Yes  ☐ No

Details of Reasons for Soundess/ Legal Complaince:
Reliance of SD7 and SD5 will result in the coalescence of Polegate and Stone Cross to the detriment of maintaining the existing hierarchy and pattern and character of settlements. It would lead to a significant and irreversible change to the character of Wealden contrary to Core Strategy objectives (see for example 2.4, 2.7, 2.21 and 3.4 WCS)

Details of Changes to be Made:
Delete Stone Cross North from the town/ settlement list or amend to exclude the area beyond the existing western extreme of the settlement as defined on the Key Diagram. Include SD13 Land at South Hailsham (centred on Oaklands Farm/ Brickfields Ersham Road)
Representation ID
1187
Person ID  Miss Heron
Agent ID
534582
WCS4 Strategic Development Areas Policy 4
Sound  □ Yes  ☑ No  ☑ Justified  ☑ Effective  ☑ Consistent with national policy
Legally Compliant  □ Yes  □ No
Details of Reasons for Soundess/ Legal Complaince:
The delivery of only 160 dwellings to Hethfield at Land to the north west is not sufficient to meet the Heathfield area strategy, and therefore the delivery of the overall strategy of the Document. it will not address the high housing demand for both market and affordable housing. There is no justification within the evidence base to limit growth in a town that is capable of accommodating sustainable growth despite being surrounded by AONB.
Details of Changes to be Made:
I nclude land at Tilsmore, Heathfield as a strategic development site. Implementation of this site could help to meet the acute need for housing in the town.

Representation ID
1175
Person ID  Trus
Agent ID  Mr Scott
522185  261712
WCS4 Strategic Development Areas Policy 4
Sound  □ Yes  □ No  ☑ Justified  □ Effective  □ Consistent with national policy
Legally Compliant  ☑ Yes  □ No
Details of Reasons for Soundess/ Legal Complaince:
Whilst it is clear that the Council have aspirations for the development of the current Council Offices site at Pine Grove, but it is not accepted that the redevelopment of this site can be considered to be of a scale and importance to warrant its inclusion within this policy. Moreover, whilst not specifically mentioned in this policy, the level of housing growth that is envisaged on this site is not supported by any detailed capacity study or indeed an assessment against the aims and objectives of the town Council as set out in the vision document, Top of the Weald which provides support for an employment centred re-use of the site to counter the loss of employment that will be created by the closure of the Council Offices. As stated above, my clients control a large area of land to the south side of Crowborough which is not actively farmed and which is therefore available for development within the current plan period. We would therefore welcome the opportunity to meet with the council to discuss how this site might fit into the Council's long term aims and objectives
Details of Changes to be Made:
Policy should be worded to accord with Town Council's vision document and provide for emploeyment led developments
WCS4 identifies the Strategic Development Areas that will deliver the new allocations to meet the overall housing requirements. WCS4 identifies 12 No. Strategic Development Areas (SD1 – SD12) to meet the overall housing growth including ‘SD11: Land at North West Heathfield’. The growth locations have primarily been based on the settlement hierarchy as identified in Section 7 of BP1: Development of the Proposed Submission Core Strategy and the directions of growth as tested in Section 8 of BP10: Sustainability Appraisal. The SHLAA (March 2010) and SHLAA Addendum (October 2010) has identified suitable sites in each of the 12 No. growth locations (SD1 – SD12) and demonstrates that there is sufficient supply of land in each location to meet the growth requirements. In North West Heathfield, the SHLAA has found 5 No. sites which could potentially accommodate 184 dwellings. Of these 5 No. sites, Summertree Estates owns 1 No. totalling 130 dwellings (based on SHLAA assumptions) and has legal control over 1 No. totalling 6 dwellings (based on SHLAA assumptions), refer to Table 2. Table 2: Suitable Sites Identified in SHLAA in North West Heathfield Site Name SHLAA Ref Capacity Ownership Land at the rear of Reynards, Woodhatch and rear of Police Station, High Street 155/1210 130 Summertree Estates Ltd Holmhurst, High Street 526/1210 6 Private Ownership (under legal control of Summertree Estates Ltd) Sub total 136 Land at Tilsmore Nurseries, off Nursery Way 307/1210 21 Seven equal Shareholders Land to the Rear of Rothershaw, High Street 525/1210 21 Private Ownership Lavender Cottage, High Street 519/1210 6 Private Ownership Sub Total 48 TOTAL 184 With regards to Heathfield, paragraph 8.28 – 8.32 of BP2: Managing the Delivery of Housing identifies a significant level of existing and future ‘need’ and concludes that ‘some housing growth is required in Heathfield to help support local services and facilities’. This includes the need for affordable homes. As such, Heathfield has been identified to deliver 452 dwellings in the plan period. WCS2 identifies 292 units are already committed and the remaining 160 dwellings are proposed to be new greenfield allocations in North West Heathfield. It should be noted that the 292 dwellings committed are all considered ‘windfall development’ and demonstrates the shortcoming of WDC’s approach in relying on windfall development to justify housing completions. Notwithstanding our concerns relating to the lack of evidence supporting the ‘committed’ units, we support the strategy for Heathfield in terms of direction of growth (i.e. North West). However, we consider the quantum of new allocations (160 dwellings) should be reviewed in the light of the lack of demonstrable evidence with regards to the committed sites and the potential failure to deliver these ‘windfall developments’. Any review would need to be assessed against the sensitive environmental considerations and sustainability credentials of Heathfield in the context of the wider District. The Sustainability Appraisal (BP10) provides a comprehensive appraisal of the overall strategy and provides a clear audit trail of the alternative options tested at the Spatial Development Options stage (June 2009) for the District and Heathfield. Table 1.1 (pages 4-5) of BP10: Sustainability Appraisal identifies the conclusions made by WDC on the previous alternative options. Table 1.1. demonstrates that the favoured Strategy comprises parts of the previous six spatial options already tested and is considered to represent the most suitable balance when all matters are taken into consideration. WDC’s justification for this route is further explored in paragraph 8.40 and Table 8.8 (p92) of BP10: Sustainability Appraisal, which identifies three particular growth scenarios and states, in part: ‘Table 8.8 indicates all three options for the strategic spatial distribution of housing and the reason for selecting options.’ Section 8 of BP10: Sustainability Appraisal assesses the broad locations of development within the main settlements. With regards to Heathfield, Table 8.3 (p68) of BP10: Sustainability Appraisal tested three potential alternative locations (as identified in Fig. 8.2). At that stage, the SA assessed these locations in Heathfield which the original SHLAA (March 2010) had found to be suitable as sites to accommodate potential growth. Subsequently, the SHLAA Addendum (October 2010), found that the area to West of Heathfield (SHLAA Ref. 149/1210) was no longer suitable for development based on a number of highway and AONB impact related issues. Section 3.3. (pp 27–29) of the Landscape Strategy (February 2009) assessed potential development areas in Heathfield in connection with the impact of general growth on the wider AONB and landscape setting. The strategy was prepared in the early stages of the Core Strategy and preceded the findings of the SHLAA. Nevertheless, the Landscape Strategy identified that: North Heathfield: § ‘Future development should be well designed, with good linkages to the town centre and in keeping with the local vernacular’ (para 3.3.2) § ‘The open slopes to the North East of the town afford long views across the High Weald Landscape to the Mayfield ridge in the North. (para 3.3.3) § ‘The capacity of the Tilsmore Wood Area is limited to areas of clearing at the edge of the urban area’ (para 3.3.3) East Heathfield: § ‘There is no scope for development within the park (to the East) which needs to be managed and protected’ (para 3.3.4) South Heathfield: § ‘The capacity of this area is constrained by steep topography and the need to retain the Ghyll
Woodland’ (para. 3.3.5) West Heathfield: § ‘There are urban fringe influences and areas of degraded landscape where capacity for development would rely on the conservation and enhancement in accordance with AONB policy’ (para 3.3.6) The Landscape Strategy identifies all the possible development locations in Heathfield will carry some landscape impact, albeit the Landscape Strategy does recognise that some areas would have significant impact and would therefore be inappropriate for growth (i.e. North East and East Heathfield). Page 69 of BP10: Sustainability Appraisal acknowledges that greenfield/AONB release is required to allow development to take place in Heathfield to meet the growth requirements, and we support this recognition. The SHLAA (March 2010) and SHLAA Addendum (October 2010), assessed the suitability of ‘the Site’ with the benefit of the conclusions of the Landscape Strategy and confirmed that ‘development would have limited impact on the wider landscape of the AONB’. It is therefore considered in terms of Landscape impact, WDC has assessed all the potential development options and concluded that on balance, North West Heathfield remains the most appropriate, and deliverable location for growth. Notwithstanding the above, Table 8.3 (p68) of BP10: Sustainability Appraisal clearly assesses the alternative potential growth locations for Heathfield and demonstrates that the scale of development proposed at Heathfield, and the preferred direction of growth, was acceptable and therefore the strategy for Heathfield is the most suitable when assessed against all the reasonable alternatives i.e. it is ‘justified’. Table 8.9 (p94) of BP10: Sustainability Appraisal, concludes on the potential growth options for Heathfield. It identifies that of the available areas, North West Heathfield was the most suitable direction to locate growth. An extract is provided below. Extract of Table 8.9 of BP10: Sustainability Appraisal Broad Locations for Heathfield North East Not taken forward – option raises concerns over its physical dislocation from the town centre and its ability to incorporate development into the Heathfield community. Further concern with this option over the possible adverse environmental impacts on the SSSI to the South. West Not taken forward – option is well located in relation to the town centre providing opportunities for good connectivity. The option offers relatively minimal landscape impacts. Transport implications were subsequently assessed and the area deemed unsuitable. North West Selected – option is well located in relation to the town centre providing the opportunities for good connectivity. The option offers relatively minimal landscape impacts. The Strategy in Heathfield is also ‘effective’ as the direction of growth is considered deliverable. This is based on the suitability of the sites found in the SHLAA and that Summertree Estates could deliver the growth in a comprehensive scheme and accords with paragraph 21 of the ‘Learning From Experience’ Guidance, which states: ‘in some instances the weakness derives from a failure to identify sufficient and/or appropriate land for development’. The Strategy is both ‘deliverable’ and ‘flexible’ as there are no overriding environmental or infrastructure constraints present in Heathfield that would require contingency sites. Therefore growth of this scale can be achieved in Heathfield from this location. This is explored further below.

Details of Changes to be Made:
INFRASTRUCTURE The local roads and traffic infrastructure is already running to its maximum capacity at present. During peak commuting hours, traffic is often congested along the A2270 Eastbourne Road, from as far as Willingdon roundabout to Cophall roundabout, Polegate High Street and C40 Wannock Road and Hailsham Road. Any increase in the number of vehicle movements from the proposed Morning Mills Farm needs to address this issue with a workable plan. As yet, Wealden District Council has not been confirm how the highways issue will be addressed and how the traffic will work to accommodate the current high volume of traffic movements and with the extra proposed 700 new allocations (dwellings) and 8600 square metres of employment floor space on land at Hindsland / Morning Mill Farm would create. The South Wealden and Eastbourne Transport Study (SWETS) report had used difference format on the same Trip Rates & Trip Generations, it make it very hard for the general public to understand exactly what the Trip Rates & Trip Generations are. However, Wealden District Council in the Honey Farm Appeal submissions, indicated that the traffic and road INFRASTRUCTURE can not accommodate the estimated traffic generated from the 520 houses, as there is only about 50 meters from Cophall roundabout. I would question how 50% more houses and 8600 square metres of employment floor space would able to cope in the same road. Using the formula, the Trip Generation would be 450 both ways which equates to approximately 38 vehicle movements every 5 minutes. This Council has not been able to answer my question fully and has simply said that would be the Highways Authority’s responsibility. I refer to pages 69 and 70 of the East Sussex County Council Highways' Report dated 10 September 2010 for information of their findings, which is relevant to my submissions above. COPHALL ROUNDABOUT SENSITIVITY TEST 3.1 Using the Dittons Road trip rates, the development traffic from 520 dwellings on the PW1 site has been calculated as follows: Table 3.1: 520 Dwellings Trip Rates & Trip Generations Time Period Trip Rates Trip Generations AM Peak Arrive Depart Two way Arrive Depart Two way (0800 - 0900) 0.12 0.46 0.58 62 239 301 The data shows an increase of about 301 trips per hour, 5,016 cars per minute, will affect other junctions seriously and create a bottleneck at A22/A27 and the Polegate cross roads, currently at peak times, there are long queues from Cophall roundabout back to Lower Willingdon and C40 Wannock Road. Within the honey Farm appeal, this Council argues that it would be difficult for vehicle users to enter the Cophall roundabout and make their journeys to the A27 to get to Lewes or Hailsham and other areas. The Council also contends that the infrastructure would not be able to cope with the number of dwellings at the site, despite this argument raised by the Council, those same arguments also apply to the Mornings Mill Farm site, which this Council has failed to consider. INFRASTRUCTURE- SCHOOL AND HEALTH FACILITIES As it stands, the local Schools and health facilities are only just able to cope with the high level of service users in the Eastbourne area. An estimated increase in the local population by at least 2,000 – 3,200 people will see a severe strain on the local resources available within the infrastructure. Willingdon Community School is already oversubscribed and as an example, mobile classrooms were introduced some years ago to accommodate the increase in students. To propose a further extension at Willingdon Community School to take on more students will see a further strain on the infrastructure, the impact of the surrounded roads and parking will be severely impacted. The need of a new community school and primary school has not been fully considered and no site has been identified within the plans. The proposed new medical center at the former Towermill Place remains very uncertain, this council had amended the wording at the end, it is misleading that the new medical center is part of the Infrastructure when the funding is so uncertain, this was not revealed until I questioned this at a cabinet meeting. PUBLIC TRANSPORT In the Core Strategy - Proposed Submission Document and at Wealden District Council meetings, the bus corridor has been mentioned many times and our group has submitted that it would simply be unworkable. Currently there is heavy traffic congestion along the A2270 at peak times, with the extra traffic joining A2270 created from the proposed Morning Mills site, it would be impossible for the bus to move from A to B. The Council should be aware that the bus companies contend that there are not enough service users in the area which has resulted in a number of cuts in the bus services within recent years. There is no doubt the choice of public transport is very limited which makes the travel plans unfeasible, despite this, this Council is still adamant that the Morning Mills site is suitable For example, in the Pevensey Road area, North Polegate, there are about 640 dwellings. A few months ago, Stagecoach had considered withdrawing the main bus service for this area. It is very difficult to believe that the proposal of 700 dwellings will actually sustain the service and the bus service will actually remain in place. PROPOSED SUBMISSION CORE STRATEGY OPTION CONSULTATION 2007 Again, in 2007, 749 Polegate and Willingdon residents submitted their consultation slips to Wealden District Council and the majority of their views was that Hindslands should not be developed and should remain as a green area. It is very difficult to believe that the proposal of 700 dwellings will actually sustain the service and the bus service will actually remain in place. PROPOSED SUBMISSION CORE STRATEGY OPTION CONSULTATION 2007 Again, in 2007, 749 Polegate and Willingdon residents submitted their consultation slips to Wealden District Council and the majority of their views was that Hindslands should not be developed and should remain as a green area.
area and recreational ground. However, Wealden District Council and other groups within the council decided not to accept their consultation slips and their views. At the same time, Wealden District Council received about 1,100 submissions from Polegate and Willingdon residents were ignored, as result this seems to have controlled the outcome. Most members of this Council opposed the Honey Farm proposal, their reasons are almost the same as the reasons we have submitted that apply to Hindsland / Mornings Mill Farm. In addition, in the Wealden non-statutory local plan consultation in 2003, we presented a petition signed by 1000 Willingdon households to Wealden District Council. Hindsland / Mornings Mill Farm is not suitable to build extra 1000 new homes. I am pleased to say that the Council and Councillors had made a very sensible decision at the time, 8 years on, there are no changes or improvements within the infrastructure. We are continually facing shortage of secondary school places, primary school places, nursery places and facilities including sports and play facilities, amenity space, parking places an indoor sports hall and swimming pool and yet this Council considers that these will be provided, how? There is no mention of any sustainable or plausible proposal. GREEN SPACE It is important that Hindsland / Mornings Mill Farm continue to remain as a green site between Polegate and Willingdon, according to the local plan. Currently Polegate Town and Willingdon & Jevington Parish Council are short of amenity and recreation space, the shortage is between 30 - 40% below of the national average. In the Proposed Submission Core Strategy Document there is nothing to address this issue. WATER AND SEWAGE On many occasions, our group has submitted that the water supply and sewage is at their full capacity. During meetings at Wealden District Council, we have been told that the sewage has the capacity for the maximum of 1000 new houses. The proposed house numbers are well over the limit of its full capacity. Again these essential facilities continue remain outstanding and the issues ignored

Details of Changes to be Made:
### Summary of all Representations - Proposed Submission Core Strategy Regulation 27 - Report 11th July 2011

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<td>1224</td>
<td>M J</td>
<td>Mr Pickup</td>
<td>3.2 Crowborough is identified by the Council as a &quot;top tier&quot; District Centre within Wealden District which in strategic and locational terms is relatively close to two of the Council's three highest order &quot;Primary Centres&quot; at Tunbridge Wells and Tonbridge to the north of the District. The Council suggests however, tha the potential for future housing land release at Crowborough is limited, due mainly to landscape constraints. 3.3 No satisfactory evidence has been produced by the Council to show that Crowborough is any more constrained than development at other locations more favoured by the Council for strategic housing development, such as at Uckfield (within its historic flood risk problems and traffic congestion in its town centre) or within the Hailsham/Polegate/Stone Cross area (where there are wast water treatment constraints that could affect the high protected Pevensey Levels area within the southern part of the district). As it stands at present and for no sound reason, new housing provision would be heavily biased towards meeting housing requirements in the central and southern parts of the District rather than in the northern part, where demand is high as reflected by local house prices. 3.4 There is no sound evidence that the Crowborough area can only accommodate up to 300 new dwellings nor is any sound reason given for delaying such housing development until the middle and end part of the PSCS DPD period. In particular, this has major implications for the delivery of affordable housing, for which there is a recognised need in Crowborough. this would be limited to just 105 additional affordable dwellings between 2015 - 2030 (assuming 35% delivery within the strategic development areas identified by the Council) 3.5 he Council has provided no satisfactory explanation as to what is meant by a &quot;Strategic Development Area&quot; (either in relation to the settlement hierarchy or in terms of the size of potential housing sites or the number of houses). Furthermore, not only is the purposes of identifying such areas unclear, but also there are clear inconsistencies in the Council's overall identification of potential strategic development areas compared to other areas within the District (e.g. Horam) where a significant number of dwellings might be also delivered, but without SDA status. 3.6 The identification of 12 SDAs in draft Policy WCS4 also prejudices any proper or detailed examination and assessment of other potentially suitable housing land at Crowborough (and elsewhere) at the SS and DSA DPD stage. these representations have in particular, demonstrated that the Council's identification of SDAs at Crowborough (the subject of SD8 - SD10) are not based on any creditable or sound evidence, nor do they necessarily represent the best locations or land available for future housing development (contrary to national planning policy contained in PPS12, paragraph 4.38). The Council's contingency site, which although shown in figure 9 and on the key Diagram of the PSCS DPD is not referred to in any draft Core Strategy policy. In addition it is allocated for another purpose within the Non-Statutory Local Plan and is wholly within the HWAOBN. 3.7 The identification of SDAs in draft Policy WCS4 means that to be properly tested at the EIP, there would need to be a much wider consideration of all suitable candidate sites such as the land at Alderbrook, which is allocated for housing development in the Non-Statutory Local Plan (Policy CR4) and is within the Crowborough development boundary. This is immediately available to provide approximately 80 dwellings (24 affordable) and would not have to be delayed until either the middle or the end of the plan period unlike SD8, SD9 or SD10. 3.8 It must be highly questionable whether it would be appropriate to examine and compare the SDA sites with other candidate sites at the PSCS DPD EIP. It is also highly questionable as to whether the Council's proposed SS DPD would serve any purpose other than to merely identify site boundaries or provide 'development briefs' for the 12 DSAs listed in draft Policy WSC4. If so, it is questionable as to the purpose of the Council's proposed SS DPD as the site boundaries could be identified in the Council's proposed DSA DPD and development briefs could be provided in the form of Supplementary Planning Documents. 3.9 The Council's proposed Spatial Strategy Policy is a fundamental part of the PSCS DPD and if this is found to be fundamentally flawed for the cumulative reasons put forward in these representations, then the document would be intrinsically unsound. Rather than identifying suitable settlements and broad numbers for new housing delivery in each based upon the Council's proposed settlement hierarchy, the Council has largely ignored this and has instead identified SDAs at specif locations, thereby significantly restricting the scope of the Council's proposed SS DPD which would appear to be limited to merely defining site boundaries, rather than providing robust policy based on a full and proper assessment of all suitable and available candidate sites. Eight Appendices have been submitted, but are not attached, and these are available to view at the Council Offices by request.</td>
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#### Details of Changes to be Made:

3.10 Indeed, the PSCS DPD is so defective that is difficult to see how it could be reasonably altered in view of the
fundamental nature of these representations and the only potential way forward in this situation would be for the Council to withdraw the document in order to either provide a detailed evidence base for each of its proposed SDAs or alternatively and more appropriately, for this to form part of a later SS DPD (if still relevant) or a DSA DPD, once the core strategy has been adopted. This would then provide a proper opportunity to assess in detail all the housing sites proposed by the Council together with other candidate sites having regard to the overall housing requirement and the hierarchy of settlements as set out in the Core Strategy DPD.
I write to register my objections to the Polegate and Willingdon and Stone Cross area strategy in the Core Strategy on the basis that it is not sound nor justified for the following reasons: INFRASTRUCTURE- SCHOOL AND HEALTH FACILITIES As it stands, the local Schools and health facilities are only just able to cope with the high level of service users in the Eastbourne area. An estimated increase in the local population by at least 2,000 – 3,200 people will see a severe strain on the local resources available within the infrastructure. Willingdon Community School is already oversubscribed and as an example, mobile classrooms were introduced some years ago to accommodate the increase in students. To propose a further extension at Willingdon Community School to take on more students will see a further strain on the infrastructure, the impact of the surrounded roads and parking will be severely impacted. The need of a new community school and primary school has not been fully considered and no site has been identified within the plans. The proposed new medical center at the former Towermill Place remains very uncertain, this council had amended the wording at the end, it is misleading that the new medical center is part of the Infrastructure when the funding is so uncertain. This was not revealed until Cllr Stephen Shing questioned this at a cabinet meeting. PUBLIC TRANSPORT In the Core Strategy - Proposed Submission Document and at Wealden District Council meetings, the bus corridor has been mentioned many times and our group has submitted that it would simply be unworkable. Currently there is heavy traffic congestion along the A2270 at peak times, with the extra traffic joining A2270 created from the proposed Morning Mills site, it would be impossible for the bus to move from A to B. The Council should be aware that the bus companies contend that there are not enough service users in the area which has resulted in a number of cuts in the bus services within recent years. There is no doubt the choice of public transport is very limited which makes the travel plans unfeasible, despite this, this Council is still adamant that the Morning Mills site is suitable For example, in the Pevensey Road area, North Polegate, there are about 640 dwellings. A few months ago, Stagecoach had considered withdrawing the main bus service for this area. It is very difficult to believe that the proposal of 700 dwellings will actually sustain the service and the bus service will actually remain in place. The local roads and traffic infrastructure is already running to it’s maximum capacity at present. During peak commuting hours, traffic is often congested along the A2270 Eastbourne Road, from as far as Willingdon roundabout to Cophall roundabout, Polegate High Street and C40 Wannock Road and Hailsham Road. Any increase in the number of vehicle movements from the proposed Morning Mills Farm needs to address this issue with a workable plan. As yet, Wealden District Council has not been confirm how the highways issue will be addressed and how the traffic will work to accommodate the current high volume of traffic movements and with the extra proposed 700 new allocations (dwellings) and 8600 square metres of employment floor space on land at Hindsland / Morning Mill Farm would create. The report had used difference format on the same Trip Rates & Trip Generations, it make it very hard for the general public to understand exactly what the Trip Rates & Trip Generations are. However, Wealden District Council in the Honey Farm Appeal submissions, indicated that the traffic and road infrastructure can not accommodate the estimated traffic generated from the 520 houses, as there is only about 50 meters from Cophall roundabout. I would question how 50% more houses and 8600 square metres of employment floor space would able to cope in the same road. Using the formula, the Trip Generation would be 450 both ways which equates to approximately 38 vehicle movements every 5 minutes. This Council has not been able to answer my question fully and has simply said that would be the Highways Authority’s responsibility. The report does not even address how this traffic problem will be address at present or in the future. The increase of about 301 trips per hour, 5,016 cars per minute, will affect other junctions seriously and create a bottleneck at A22/A27 and the Polegate cross roads, currently at peak times, there are long queues from Cophall roundabout back to Lower Willingdon and C40 Wannock Road. Within the honey Farm appeal, this Council argues that it would be difficult for vehicle users to enter the Cophall roundabout and make their journeys to the A27 to get to Lewes or Hailsham and other areas. The Council also contends that the infrastructure would not be able to cope with the number of dwellings at the site, despite this argument raised by the Council, those same arguments also apply to the Mornings Mill Farm site, which this Council has failed to consider. PROPOSED SUBMISSION CORE STRATEGY OPTION CONSULTATION 2007 Again, in 2007, 749 Polegate and Willingdon residents submitted their consultation slips to Wealden District Council and the majority of their views was that Hindslands should not be developed and should remain as a green area and recreational ground. However, Wealden District Council and other groups within the council decided not to accept their consultation slips and their views. At the same time, Wealden District Council received about 1,100 from the whole district. Therefore the 749 submissions from...
Polegate and Willingdon residents were ignored, as result this seems to have controlled the outcome. Most members of this Council opposed the Honey Farm proposal, their reasons are almost the same as the reasons we have submitted that apply to Hindslands / Mornings Mill Farm. WATER AND SEWAGE On many occasions, our group has submitted that the water supply and sewage is at their full capacity. During meetings at Wealden District Council, we have been told that the sewage has the capacity for the maximum of 1000 new houses. The proposed house numbers are well over the limit of it’s full capacity. Again these essential facilities continue remain outstanding and the issues ignored GREEN SPACE It is important that Hindsland / Mornings Mill Farm continue to remain as a green lung between Polegate and Willingdon, according to the local plan. Currently Polegate Town and Willingdon & Jevington Parish Council are short of amenity and recreation space, the shortage is between 30 - 40% below of the national average. In the Proposed Submission Core Strategy Document there is nothing to address this issue. I trust that the above representations will be placed on record accordingly.

Details of Changes to be Made:
NUMBER OF ALLOCATED HOUSING CONTRADICTS THE AMOUNT WHICH IS CLAIMED TO EVEN BE SUSTAINABLE. It is very disappointing that despite repeatedly asked questions at Wealden District Council’s full council meetings and committees regarding the proposed 1265 new houses for this area, Wealden District Council’s position is that it is waiting for the outcome of the Honey Farm Appeal where the proposal is for up to 520 houses. So far, there has never been any mention of any alternative plans should the Council lose the appeal. The Council appears to be confident in defending this appeal, despite also contradicting itself with by using the exact same reasons in the rejection of Honey Farm at Committee to justify and support those proposals within the Core Strategy for the Polegate and Willingdon area, for a site which is only down the road where the same problems would apply. Wealden District Council clearly has no plan B and if Wealden District Council cannot successfully defend this appeal, Willingdon and Polegate will automatic be lumbered with 1785 extra houses. For this reason alone, the Proposed Submission Document is irresponsible and misleading the communities. In addition reason as below:

- INFRASTRUCTURE - SCHOOL AND HEALTH FACILITIES: As it stands, the local schools and health facilities are only just able to cope with the high level of service users in the Eastbourne area. An estimated increase in the local population by at least 2,000 – 3,200 people will see a severe strain on the local resources available within the infrastructure. Willingdon Community School is already oversubscribed and as an example, mobile classrooms were introduced some years ago to accommodate the increase in students. To propose a further extension at Willingdon Community School to take on more students will see a further strain on the infrastructure, the impact of the surrounded roads and parking will be severely impacted. The need of a new community school and primary school has not been fully considered and no site has been identified within the plans. The proposed new medical center at the former Towermill Place remains very uncertain, this council had amended the wording at the end, it is misleading that the new medical center is part of the Infrastructure when the funding is so uncertain. This was not revealed until Councillor Stephen Shing questioned this at a cabinet meeting.

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Details of Changes to be Made:

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<tr>
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<td>Mrs Kelly</td>
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<td>WCS4 Strategic Policy 4</td>
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<tr>
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Details of Reasons for Soundess/ Legal Compliance:

Rydon supports the identification of 'Land at East and South East of Stone Cross' under SD6 as an area critical to the delivery of the overall strategy. Rydon has a land interest to the south of Rattle Road which we can confirm meets the test of being 'suitable, achievable and available' for development in WDC's SHLAA and is therefore considered deliverable.

Details of Changes to be Made:
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the national average. In the Proposed Submission Core Strategy Document there is nothing to address this issue. 
I trust that the above representations will be placed on record accordingly.

Details of Changes to be Made:
Our client has been engaged in discussions with the Council regarding the suitability of this redundant land for development for some time, and has previously submitted representations promoting the site through local plan reviews, and more recently, through the emerging Local Development Framework. In August 2009 King Sturge submitted technical information in support of our submission to the Strategic Housing Land Availability Assessment and representations were made to the Core Strategy Spatial Development Options Consultation Document (July 2009). We support Wealden District Council’s identification of land to the south of Polegate and east of Willingdon as an urban extension for residential, employment, leisure, recreation and community uses (Strategic Development Area 4 in Policy WCS4). Considerable background work and research has been undertaken by the Council in preparing the submission draft of the Core Strategy and we consider the Council have a sound evidence base to support the allocation. We consider this area has significant advantages compared to other locations in the Polegate area, to accommodate future development needs: · This area is well located in relation to existing development at Polegate and Willingdon, and it would form a natural extension. In particular, the area is well related to Polegate town centre (with its facilities as well as the railway station) which is within easy walking distance. There is the opportunity to create links to the town centre as well as other parts of the existing built-up area. The area is well served by existing bus services on Eastbourne Road, as well as the local cycle network. This complies with Planning Policy Statement 3 (Housing) which states that housing developments should be in suitable locations which offer a good range of community facilities and good access to jobs, key services and infrastructure. This should be achieved by making effective use of land and existing infrastructure thus contributing to the achievement of sustainable development. · In terms of potential visual impact on the AONB, including the newly created South Downs National Park, this area has significant advantages compared to other potential locations elsewhere in the Polegate area. · The area is of sufficient size to meet the needs for development in the Polegate area during the plan period. · There are no significant constraints to the development of the area in terms of ecology, landscape features or flooding. · The area benefits from the potential to secure vehicular access from Eastbourne Road as well as from other parts of the built-up area of Polegate that lie immediately adjacent. The area is available for development, and offers the opportunity for phased development.

Details of Changes to be Made:
Details of Reasons for Soundess/ Legal Complaince:

4.1 We support the identification of the North Hailsham SDA in policy WCS4 Strategic Development Areas. However, further certainty needs to be included within the policy to ensure that the housing strategy is effective, flexible and deliverable. 4.2 The North Hailsham SDA includes two sites that were found “suitable” for the provision of housing in the SHLAA, the land at the east of the North Hailsham urban extension (site reference 243/1310), which is the subject of this representation, and land at the west of the North Hailsham urban extension (site reference 240/1310). 4.3 In line with the guidance in PPS12 the Core Strategy can, more definitively, allocate these strategic sites for development, as they are central to the achievement of the council’s spatial strategy. The site areas of the SDAs are evident and there is no need for further consideration in the Site Allocation DPD. 4.4 In order to ensure that sites within the SDAs have regard to each other and achieve the requirements outlined in the Core Strategy, the policy should require that frameworks for the delivery of the SDAs should be agreed between the interested parties and council. Not only will this help secure the delivery of the SDAs in a timely manner but it provides greater opportunity for effective and focussed community involvement in drawing up the frameworks - the Site Allocation DPD will not facilitate this level of involvement. The following text should be added to policy WCS4: “The following strategic development areas are the locations that are considered to be critical to the delivery of the overall strategy. Frameworks for the delivery of the strategic development areas will be prepared to ensure sites within them can be delivered independently and in a comprehensive manner ...”

Details of Changes to be Made:

4.4 In order to ensure that sites within the SDAs have regard to each other and achieve the requirements outlined in the Core Strategy, the policy should require that frameworks for the delivery of the SDAs should be agreed between the interested parties and council. Not only will this help secure the delivery of the SDAs in a timely manner but it provides greater opportunity for effective and focussed community involvement in drawing up the frameworks - the Site Allocation DPD will not facilitate this level of involvement. The following text should be added to policy WCS4: “The following strategic development areas are the locations that are considered to be critical to the delivery of the overall strategy. Frameworks for the delivery of the strategic development areas will be prepared to ensure sites within them can be delivered independently and in a comprehensive manner ...”
Summary of all Representations - Proposed Submission Core Strategy Regulation 27 - Report 11th July 2011

Representation ID
1391
Person ID Mr Hester Agent ID Mr Hester
324327 Heyford Developments Ltd 324285 VLH Associates
WCS4 Strategic Development Areas Policy 4
Sound ☐ Yes ☑ No ☑ Justified ☑ Effective ☑ Consistent with national policy
Legally Compliant ☑ Yes ☐ No
Details of Reasons for Soundess/ Legal Complaince:
FULL REPRESENTATIONS ATTACHED In essence, these representations support proposed Policy WCS4 and Strategic Development Area SD2 in the Draft Core Strategy - in that it proposes strategic housing growth in the east part of Hailsham. The Amberstone Nursery Site, Magham Road, Hailsham which has a SLHAA reference: 128/1310 falls within the proposed east hailsham housing growth area. Notwithstanding, these representations object to the phased release of sites within SD2, and disagree with the Council's view that these sites could not be released before 2017.

Details of Changes to be Made:
FULL REPRESENTATIONS ATTACHED Of the sites shown in SD2, there are 4 potential housing development sites: 128/1310 (Amberstone Nursery) 523/1310 (Land adjacent to Amberstone Nursery) 215/1310 (Poplar Cottage Farm) 134/1310 (Land North of Harebeating Lane) It is our view that these four sites could be considered to be released ahead of those others set out in SD2 and that Amberstone Nursery could come forward first, without being held back until 2017.

Representation ID
1392
Person ID Mr Hawkins Agent ID Mr Hawkins
343219 Charles Church Southern 102627 Bell Cornwall
WCS4 Strategic Development Areas Policy 4
Sound ☐ Yes ☑ No ☑ Justified ☑ Effective ☑ Consistent with national policy
Legally Compliant ☐ Yes ☐ No
Details of Reasons for Soundess/ Legal Complaince:

Details of Changes to be Made:
Core Strategy Policy WCS4 to be amended by SD12 to change from 120 to between 220 - 250 dwellings as set out in detail in the Bell Cornwall Supporting Statement.
Details of Reasons for Soundness/ Legal Complaince:
We object to the council’s identification of SD1 within policy WCS4. Many of the arguments that the council seems to have applied in identifying land to the west of Uckfield, are the same as those that were used to justify refusing the Downlands site to the north east of Uckfield. The site identified within SD1 is highly exposed in landscape terms, indeed the background evidence for the Core Strategy, particularly the Landscape Study identifies that only a small element of the site is developable. For the Council to suddenly ignore this supporting evidence seems somewhat perverse. Indeed, the same document identifies that an element of the Downlands site is similarly capable of development, yet the council are proposing a Core Strategy which completely contradicts and ignores this evidence. The council appear to accept the desperate need for housing and indeed the need for housing at Uckfield, which we agree is a suitable location for development, yet rely on the previous appeal decision for the Downlands site to now ignore it, even though many of the arguments against Downlands coming forward would apply equally well to SD1 (land west of Uckfield). We also question the council’s identification of the site within SD1 on the basis that as paragraph 6.11 identifies the “allocation of land is subject to the provision of a suitable access and a number of other factors to be addressed in the relevant Site Allocation DPD”. Paragraph 4.6 of PPS12 confirms that “Core strategies may allocate strategic sites for development. These should be those sites considered central to achievement of the strategy”. PPS 12 goes onto confirm that Core strategies must be; • founded on a robust and credible evidence base; and • the most appropriate strategy when considered against the reasonable alternatives”. It is obvious on the basis that the “allocation of land is subject to the provision of a suitable access” that the identification of SD1 is not founded on a robust or credible evidence base, with one of the fundamental principles of allocating a site for development; access still to be determined. PPS 12 paragraph 4.45 goes onto state that “Core Strategies should show how the vision, objectives and strategy for the area will be delivered and by whom, and when. This includes making it clear how infrastructure which is needed to support the strategy will be provided and ensuring that what is in the plan is consistent with other relevant plans and strategies relating to adjoining areas”. For those reasons above this is not the case with SD1, however, land at Downlands achieves all of the above and is therefore a clear and obvious alternative to SD1. Moreover, land identified within SD1 is distant from the services and facilities of the town centre and as a consequence, the potential for walking and cycling is limited. In these circumstances development in this location is heavily car dependent which is unsustainable and contrary to national guidance. Development in this location would have a material impact on town centre traffic congestion and safety which is already recognised to be a material problem and one which has not been resolved.

Details of Changes to be Made:
We would suggest that flexibility as suggested within paragraph 4.14 and 4.46 of PPS 12 is identified within the document and that land at Downlands is considered as an alternative to SD1, or at the very least as a contingency should last west of Uckfield fail to be deliverable.
Details of Reasons for Soundess/ Legal Complaince:
Planning Policy Guadance 217: Planning for open space, sport and recreation 17.10 states ’existing open space, sports and recreational buildings and land should not be built on unless an assessment has been undertaken which has clearly shown the open space or the buildings and land to be surplus to requirements.’ The Core Strategy refers frequently to the lack of suitable recreational facilities, so the plan to build on an existing on (SD4) is inconsistent.

Details of Changes to be Made:
Development of SD4 area will force Willingdon and Polegate into one destroying the unique characteristics of each area as acknowledged in paragraphy 2.2. and WCS4 + 6.31(1) and WCS4 6.32(2) and WCS4 + 6.31(3)
The SWETS Report indicates that the north of Polegate location does not need additional transport infrastructure. The broad location south of Polegate / east of Willingdon was included and assessed in detail. The Polegate Bypass was opened in 2002. The Polegate Bypass has changed the landscape character of the land south of the bypass. Mounding and planting have created an enclosed area which is not easily visible from the surrounding countryside. In the decade since the bypass was completed, the land has become well-screened and more owned and accessible Coombe Hill. The impact on the views from the setting of the National Park would be negligible; the impact of the south of Polegate / east of Willingdon over the alternative location north of Polegate. It states only that the Sustainability Appraisal ‘favoured’ the former. 7. the south of Polegate / east of Willingdon location needs to be compared with the alternative north of Polegate location in terms of: a. the preference of local opinion b. the effect on local, and nationally important, landscape c. the traffic impact. Local Opinion 8. The Polegate Town Masterplan supports the north of Polegate location. The Background Paper ‘Summary of Town Masterplanning documents’ at pp15-17, Polegate Masterplan, states (para 6.10): Polegate Town Council supports the ‘suitable’ sites identified in the SHLAA with the proviso that Hindslands Fields Eastbourne Road should only be considered for the provision of a new educational facility and not housing. Future development should only take place south of the A27 Bypass and should include a good mix of dwellings and should be of appropriate design to fit in with the existing character of the area.

1. The Core Strategy's proposal for a Broad Location south of Polegate and east of Willingdon, shown in Figure 8 and discussed at paragraphs 6.30-6.31, is not sound. 2. The broad housing locations shown in the Draft Core Strategy in October 2010 were (a) to the north of Polegate and (b) to the south of Polegate and east of Willingdon. It was indicated then that no choice between them was as yet possible. 3. The Sustainability Appraisal of the Plan Alternatives sets out the findings on the two broad locations in the summary table at p96, under ‘Broad Locations Polegate’. Both ‘North’ and ‘South Polegate and East Willingdon’ are listed as ‘selected’. 4. However, the Submitted Core Strategy approved for consultation in December 2010, the only option offered at Polegate as a broad location is the land south of Polegate and east of Willingdon (Hindslands and Mornings Mill). 5. The Sustainability Assessment (Background Paper 5) at pp39-41 analyses both the broad locations against a list of objectives the summary table (at p96) demonstrates that both perform sufficiently well to meet the aims of the Strategy. A detailed response on the Sustainability Assessment entries for Polegate broad locations is attached at Appendix 1. 6. The Core Strategy at para 6.30 does not give adequate reasons, or justify, the choice of the broad location south of Polegate / east of Willingdon over the alternative location north of Polegate. It states only that the Sustainability Appraisal ‘favoured’ the former. 7. the south of Polegate / east of Willingdon location needs to be compared with the alternative north of Polegate location in terms of: a. the preference of local opinion b. the effect on local, and nationally important, landscape c. the traffic impact. Local Opinion 8. The Polegate Town Masterplan supports the north of Polegate location. The Background Paper ‘Summary of Town Masterplanning documents’ at pp15-17, Polegate Masterplan, states (para 6.10): Polegate Town Council supports the ‘suitable’ sites identified in the SHLAA with the proviso that Hindslands Fields Eastbourne Road should only be considered for the provision of a new educational facility and not housing.

Comparison of impacts on local and national important landscape. 10. The landscape impact of the north of Polegate location would be less than that of the south of Polegate / east of Willingdon alternative. It would be out of view of the South Downs; whereas the south of Polegate / east of Willingdon location would be highly visible from the publicly-owned and accessible Coombe Hill. The impact on the views from and setting of the National Park would be negligible; the impact of the south of Polegate / east of Willingdon location on these views and settings would be large. 11. the north of Polegate locations has not been subject to a landscape appraisal since the A27 Polegate Bypass was opened in 2002. The Polegate Bypass has changed the landscape character of the land south of the bypass. Mounding and planting have created an enclosed area which is not easily visible from the surrounding countryside. In the decade since the bypass was completed, the land has become well-screened and more suitable for development.

Details of Changes to be Made:
17. The Draft Proposed Submission Core Strategy Policy WCS4 (p40) lists location SD4 as 'Land at...
Polegate/Willingdon’. This is the wording that should be restored to the text of the Core Strategy to make it sound.

18. Figure 8 should be amended to delete the broad location notation (red colour) at the south of Polegate / east of Willingdon location; the notation in the October 2010 draft Core Strategy Fig 8 should be restored to indicate that both north of Polegate and south of Polegate / east of Willingdon locations are potential strategic housing locations.

### Details of Changes to be Made:

- **Representative ID**: 426
- **Person ID**: 521960
- **Agent ID**: WCS4 Strategic Development Areas
- **Policy 4**
- **Sound**: Yes
- **Justified**: Yes
- **Effective**: Yes
- **Consistent with national policy**: Yes
- **Legally Compliant**: Yes

**Details of Reasons for Soundness/ Legal Compliance:**

Employment There is a statement in para 6.33 that the number of Crowborough people working in the town is low, there is substantial out-commuting and there are pockets of unemployment, yet no additional employment land is designated. At the consultation meetings in Crowborough leading up to the development of the core strategy, the need for more local employment was emphasized by many residents and it is the experience of local councillors that this is a key issue for Crowborough. The Crowborough councillors wish to reiterate their long-held view that land near the Army Camp should be allocated for expanding employment opportunities, in spite of it being within the AONB. This location would avoid the need for heavy traffic to travel through congested parts of Crowborough and in particular avoid the need for it to use Western Road. However, the area round the Army Camp is sufficiently close to the centre to be a sustainable location.

### Details of Changes to be Made:

- **Representative ID**: 427
- **Person ID**: 521960
- **Agent ID**: WCS4 Strategic Development Areas
- **Policy 4**
- **Sound**: Yes
- **Justified**: Yes
- **Effective**: Yes
- **Consistent with national policy**: Yes
- **Legally Compliant**: Yes

**Details of Reasons for Soundness/ Legal Compliance:**

Allocation of Urban Extension SD10 for housing Development in this location would put severe pressure on the wholly inadequate highway infrastructure in this part of Crowborough. Fermor Road and Whitehill are of great concern, but of even greater concern is Western Road. There is no possibility of widening Western Road and any proposal for a one way system would put pressure on even less suitable roads, such as Mount Pleasant. For these reasons, any allocation of housing land which is near to and depends on Western Road is unsound.

### Details of Changes to Be Made:
### Representation ID 424

**Person ID** 106501  
Mr Dowsett  
Dowsett Associates

**Agent ID**  
WCS4 Strategic Development Areas  
Policy 4

**Sound** Yes  
**Legally Compliant** Yes

**Details of Reasons for Soundess/ Legal Complaince:**
Support Core Strategy

**Details of Changes to be Made:**
No change required

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### Representation ID 413

**Person ID** 521977  
Mr Ide  
Batcheller Monkhouse

**Agent ID**  
WCS4 Strategic Development Areas  
Policy 4

**Sound** Yes  
**Legally Compliant** Yes

**Details of Reasons for Soundess/ Legal Complaince:**
The identification of urban extensions is supported in principle. The policy identifies 12 Strategic Development Areas, all of which vary considerably in character. Some Strategic Allocations are challengeable, particularly that under designation SD1 (Uckfield). If these sites do not come forward, the Council has indicated that the Core Strategy will need to be reviewed. However this could interrupt housing supply. A contingency plan is therefore needed. Proposed Change

**Details of Changes to be Made:**
Council to supply explanatory text.

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### Representation ID 409

**Person ID** 521951  
Mr Pask

**Agent ID**  
WCS4 Strategic Development Areas  
Policy 4

**Sound** Yes  
**Legally Compliant** Yes

**Details of Reasons for Soundess/ Legal Complaince:**
The core development plan is flawed in a number of areas, some I have stated above but will reiterate here. Any development in Benhall Mill Road will not serve the Wealden community at large as if effectively isolated in a salient into Kent. It would be better to place any new housing nearer to existing communities and their support services, especially schools. The sites, apart from their natural beauty which should be maintained unspoilt, are poorly sited. There are no local support services and the road is completely unsuitable for traffic, both heavy and light. Waste water and rubbish collections will be an issue. Much of the burden of the extra population will be born by TW and not Wealde, which is both unfair and rather cynical on the part of WDC. Such development could also affect TWBC's own future development plans.

**Details of Changes to be Made:**
Details of Reasons for Soundness/ Legal Complaince:

HLM have reservations about: The scale of SD1 Uckfield. The deliverability of parts of SD2 East Hailsham within the timescales anticipated. The deliverability of SD4 and SD5 Polegate within the timescales anticipated. Object to scale of development proposed as part of SD6 and SD7 Stone Cross. Object to SD11 Heathfield on the grounds of suitability and deliverability. Object to SD12 Tunbridge Wells on the grounds that it will not contribute toward deliver of the Vision and Spatial Planning Objectives. Specifically in terms of Hailsham, HLM maintain that in order to provide the flexibility necessary to meet the housing needs of the town and for development to come forward in a sustainable manner, development to both the north and the east of Hailsham should be strategically planned as a single entity as opposed to two distinct areas. The PSCS should allocate the Strategic Development Area and include an overarching strategy, which provides the framework for delivery of the Strategic Development Area and knits together the individual sites, which form an integral part of that area (Section 6). Thereby avoiding the need for a further Site Allocations DPD, and the delay associated with preparation of such a document. This will allow for the most deliverable parcels, be they in the north or the east to come forward in the early part of the plan period to fund the rolling programme of investment in the infrastructure necessary to unlock the remainder of the site. This approach concurs with the proposals set out in Greg Clark's ministerial statement – ‘Planning for Growth’ (23 March 2011) which requires authorities to “take into account the need to maintain a flexible and responsive supply of land for key sectors” Hailsham has grown over time through a mosaic of sites coming forward to create successive, sustained and incremental growth required to meet demand. A sustained release of sites across both north and east Hailsham in tandem would maintain this historic pattern of growth, provide a sustainable approach to development, help new development integrate into existing communities, provide a realistic rate for the market to deliver and allow for the timely delivery of infrastructure improvements necessary to support the Strategic Development Area.

Details of Changes to be Made:

That the scale of development at Uckfield be reviewed. That the allocation at Stone Cross and Westham be reduced significantly. That the allocation at Heathfield and Waldron be deleted or replaced by a site, which is not so significantly constrained. That the allocation adjacent to Tunbridge Wells be deleted. That the allocations east and north of Hailsham be combined to form a single Strategic Development Area, allocated through this Plan.
Representation ID
397
Person ID  Mr  Wadman  Agent ID  Mr  Ide
335824  335759  Batcheller Monkhouse
WCS4 Strategic Development Areas  Policy 4

Details of Reasons for Soundess/ Legal Compliance:
The identification of urban extensions is supported in principle. The policy identifies 12 Strategic Development Areas, all of which vary considerably in character. A number of SDAs are identified north of Eastbourne, in the vicinity of the A27, with development distributed between South Polegate / East Willingdon (SD4), Dittons Road (SD5), West (SD7) and East (SD6) of Stone Cross. Key factors in determining the allocations appear to have included accessibility to the strategic and local highway network, impact upon the National Park and urban form (integrating with existing built development). Together, these allocations have a major role in delivering the emerging Core Spatial Strategy. The Core Strategy states that the South Polegate and East Willingdon allocation could accommodate around 700 dwellings with transport mitigation measures. It is not clear however that the improvements/mitigation required will accommodate this level of development. The Council needs to build in some flexibility into the Core Strategy to deal with this. The Plan states that the potential of land to the north of Polegate is limited because it is not as well connected to the town, and due to local access difficulties. The Core Strategy acknowledges however that it is considered acceptable in principle as a broad development location (Para 8.34, Development of the Proposed Submission Core Strategy Background Paper, February 2011). It is considered therefore that North Polegate should be identified as a Strategic Development Area in the Core Strategy – despite issues with access to the local highway network, land at this broad location has more direct access to the strategic highway network, and which is less constrained than the A2270. Proposed Change

Details of Changes to be Made:
Add North Polegate as a Strategic Development Area to the Core Strategy.

Sound  ☑ Yes  ☑ No  ☑ Justified  ☐ Effective  ☐ Consistent with national policy
Legally Compliant  ☑ Yes  ☐ No

Representation ID
387
Person ID  Mrs  McKeown  Agent ID
521906  Hallam Land Management Limited
WCS4 Strategic Development Areas  Policy 4

Details of Reasons for Soundess/ Legal Compliance:
Hallam Land Management Limited (HLM) support the allocation SD3 North Hailsham. This SDA includes two sites which were found to be "available, suitable and achievable" in the SHLAA, the land to the east of Park Road (site reference 243/1310) and land to the west of Park Road (site reference 240/1310). Further supporting information on land to the west of Park Road, is included in the masterplan document produced by Faulks Perry Culley and Rech (FPCR) on behalf of HLM and submitted separately. FPCR Document available to view at Council Offices

Details of Changes to be Made:
Summary of all Representations - Proposed Submission Core Strategy Regulation 27 - Report 11th July 2011

Details of Reasons for Soundness/ Legal Compliance:
The identification of urban extensions is supported in principle. The policy identifies 12 Strategic Development Areas, all of which vary considerably in character. Not all of proposed Strategic Development Area SD1 (Uckfield) is suitable for development. Uckfield is identified as having a key role in assisting with the delivery of the Core Strategy up to 2030: the strategy for Uckfield specifically is to enhance the role of the town as a District Level Centre, serving the local community and surrounding area. Para 6.11(3) states inter alia that the identification of SD1 as an allocation is subject to the provision of suitable access and a number of other factors, with these to be addressed in subsequent DPDs, and which may increase the risk to delivery. The Core Strategy recognises that if development has not started at West Uckfield by 2016, a review in relation to Uckfield will be required. Whether development has started by 2016 is one issue. Others are: i. Whether it is genuinely appropriate for development to take place over the whole allocation as indicated in the key diagram. The Sustainability Appraisal of the Proposed Submission Core Strategy, Background Papers, February 2011, recognises this issue by stating “potential landscape issues as the area is on high ground” (p.217). i. The uncertainty regarding what further studies may reveal about the practical ability of the site to accommodate development. If development has not commenced before 2016, the Council should know before then whether a review of the Core Strategy is required; why should the Core Strategy limit the potential scope of any review to the Uckfield area (Para 6.11)? SD1 is supported to the extent that it relates well to the strategic highway network. The impact of residential and other development upon SD1 will however be too prominent and intrusive along this part of the A22 corridor. Much of the development will not be easily capable of being screened. The southern part of SD1 is most exposed. It is recommended that the most sensitive landscape is retained in SD1 as open space and, as a consequence, that SD1 be extended to the south of Lewes Road to include Horsted Pond Farm and Ridgewood House – any development here could be better accommodated within the landscape. SD1, as presently drawn, is too narrowly defined in extent – the inclusion of Horsted Pond Farm and Ridgewood House within it would provide the Plan with flexibility in delivering new development to the west of Uckfield. Proposed Change

Details of Changes to be Made:
It is proposed that the SD1 allocation be extended to include Horsted Pond Farm (in part of in whole) and Ridgewood House, with consequential changes made to the Core Strategy and Key Diagram.
Details of Reasons for Soundess/ Legal Complaince:
The schedule of sites set out within WCS4 - Strategic Development Areas will not deliver a sufficient level of new housing within the Plan Period. The schedule has been prepared on the basis of an underprovision and shortfall inconsistent with the South East Plan which remains part of the development pla. The South East Plan remains the most-up-to date and authoritative development plan policy document, is evidenced based and fully tested. The schedule restricts legitimate development opportunity and accordingly will require revision should the Core Strategy be found to be unsound and inadequate. Particular attention is drawn to SD2 and SD3 where these sites are likely to have to be reconsidered in relation to the comparative distance between the site and the town centre when compared to land potentially available to the south of the town and SD3 in relation to odour constraints and resultant impact upon developable site area.

Details of Changes to be Made:
The schedule will require revision to accommodate additional strategic locations to accommodate the additional housing provision necessary to make up for the current level of planned under-provision.
The proposed urban extensions at Stone Cross (Strategic Development Areas SD6 & 7) would breach well defined development boundaries and would result in a significant encroachment of development into the countryside. This would be intrusive and damaging to the landscape and would contribute to the coalescence of Stone Cross with Polegate and Westham. This would be detrimental to the separate identities of the settlements and their rural settings. Together with the proposed employment floorspace on land south of Dittons Road (Strategic Development Area SD5), the proposed urban extensions at Stone Cross would result in a continuous built-up area along the majority A27/B2247 corridor between Polegate and Westham. The proposed urban extensions (SD6 & 7) are not justified having regard to the characteristics of the landscape and resulting impact of development as assessed in the Council’s Landscape Character Assessment and Development Option Evaluation Study. No justification has been given as to why the Core Strategy proposals have departed from the conclusions of this study. Furthermore, the Sustainability Appraisal of the Plan Alternatives as it relates to land at Stone Cross does not take full account of the findings of the Landscape Character Assessment and Development Option Evaluation Study. The objection is amplified below. The Stone Cross settlement: Stone Cross is an expanded residential settlement situated on a pronounced east-west ridge of high ground centred on the crossroads of Dittons Road/Rattle Road with Hailsham Road and Lion Hill. The A27 Pevensey Bypass lies to the north. The 1991 County Structure Plan identified Stone Cross as an area for significant growth. Wealden District Council allocated land in the South Wealden Local Plan for 1,000 new dwellings together with a primary school and other community facilities in accordance with the Structure Plan policy. As explained in paragraph 19.34.3 of the adopted Wealden Local Plan, when considering the appropriate location for future housing development, the Council felt development to the north of the ridge would be highly intrusive in a large area of open countryside beyond, whilst development to the east or west would conflict with the recognised strategic policy of maintaining existing countryside gaps between Stone Cross, Polegate and Westham. It was therefore considered by the Council that development of land to the south of the ridge was preferred as it would relate well to the existing settlement and to new housing at Langney, whilst being least intrusive to the landscape. The development boundary for Stone Cross essentially follows the physical extent of the expanded settlement and seeks to prevent further outward expansion of new development in view of the clear environmental and landscape constraints. As explained in paragraph 19.34.18 of the adopted Wealden Local Plan, in the west the development boundary incorporates the housing area but excludes land beyond as it is considered very important to prevent the lateral expansion of Stone Cross along Dittons Road towards Polegate which would lead to the coalescence of the settlements. This would be to the detriment of the identity of the settlements and to their rural settings. To the east of Stone Cross the line of trees along Beggars Lane forms a natural limit and an effective screen to development. The development boundary closely envelops frontage development along Rattle Road in order to prevent inappropriate outward expansion into the surrounding countryside or further development eastward along Rattle Road into the recognised strategic gap between Stone Cross and Westham. (Local Plan paragraph 19.34.20) The development boundary is drawn tightly around residential development south of Peels Lane. The substantial landscaping screen along the eastern edge of the development site creates an important buffer to the open and exposed farmland beyond which forms part of the strategic gap between Stone Cross and Westham, and is therefore excluded from the development boundary. To the north-west of the site the development boundary follows the well defined physical barrier of Peels Lane. (Local Plan paragraph 19.34.21) Proposed urban extensions (Strategic Development Areas SD6 & 7): It is evident from consideration of the adopted Wealden Local Plan that the extent of the expanded settlement at Stone Cross was planned with careful regard to environmental and landscape constraints, and to minimising impact on the countryside gaps between Stone Cross and Polegate and Westham. The major development proposed in Strategic Development Areas SD6 & 7 would breach the established boundaries of the Stone Cross settlement and result in the significant encroachment of development into sensitive countryside areas. The scale of the proposed development relative to the existing settlement can best be illustrated by the fact that the proposed 650 dwellings (referred to in paragraph 6.31.3) would result in a 65% increase on the amount of housing previously planned for Stone Cross. The scale of development proposed and the resultant impact is not justified when considered against the findings of the Council’s own Landscape Character Assessment and Development Option Evaluation Study. Landscape Character Assessment and Development Option Evaluation Study October 2007, The Landscape Group, ESCC: The proposed urban extension north of Stone Cross (SD7) where 430 dwellings are proposed is part covered by Stone Cross Character Areas A & B as shown on Figure 18.
of the study. Area A covers the land north and south of Dittons Road. The landscape character assessment states that "the site is so exposed it cannot absorb change and would lose even more of the little bit of character it has in common with the land further north." The assessment goes on to conclude that "there is insufficient width to mitigate the visual intrusion of the development. Extensive planting would be out of character with the open landscape. Any housing would suffer from the loud and persistent road noise. It is recommended that this strip to be buffer zone between road and existing housing." (Landscape Character Assessment Sheet Stone Cross A) Area B covers the triangle of land between the A27 and Peelings Lane. The landscape character assessment states that "it is irreplaceable as a buffer zone." (Landscape Character Assessment Sheet Stone Cross B) The proposed urban extension east and south east of Stone Cross (SD6) where 220 dwellings are proposed is covered by Stone Cross Character Areas C & D as shown on Figure 18 of the study. Area C covers the land adjacent to Friday Street. The landscape character assessment states that "the higher parts of this area are very exposed and so cannot absorb change; development would be very visible from the South Downs Way". The assessment goes on to conclude that "nothing can mitigate effects of any development on the ridge top and higher slopes. However, the lowest slopes are only visible from the urban area, and could be softened by planting." (Landscape Character Assessment Sheet Stone Cross C) Area D covers land that is part of Mountney Levels. The landscape character assessment states that "due to the open aspect of this little valley, with very little vegetation and a huge number of visual receptors, it would be very vulnerable to change. The natural beauty of this spot and the unity it has across the valley as it flattens seamlessly into The Levels is wonderful and should be conserved." With regard to the scope to mitigate visual intrusion the assessment concludes that there is "little scope for planting." (Landscape Character Assessment Sheet Stone Cross D) In the light of this assessment a summary of the landscape character and capacity of Stone Cross is contained in the February 2009 main report:- "3.11.11 The areas to the west of Stone Cross are open levels which form part of the gap between Polegate and Stone Cross and are similar in character to the area west of the A22 New Route into Eastbourne. To the north of Stone Cross the areas between the A27 by pass and urban edge are an important open buffer between the by-pass and the urban edge. These areas are influenced by urban fringe uses and a hard urban edge to the countryside. The extensive planting along the A27 reduces the impact of this from the wider levels and the road. 3.11.12 To the east of Stone Cross the Mountney Levels form an important and very open gap between the historic village of Pevensey and the built up edge of Stone Cross. There are some urban fringe influences and hard urban edges at Friday Street which impact on the rural character of the areas close to the built up edge." Potential development areas within the landscape character areas are shown on Figures 20A and 20B of the study. The potential development areas at Polegate and Stone Cross are compared in section 3.12 of the study’s main report. With regard to Stone Cross the report is emphatic in its conclusion about the harmful impact that development would have on the countryside around Stone Cross: "3.12.7 There are small areas of potential development opportunity identified around Stone Cross. These are not preferred over the areas of proposed extension to Polegate due to the need to retain strategic gaps between the settlements and to avoid coalescence. These areas would be widely visible from the Willingdon Levels and the A27." It is evident that the Council’s Landscape Character Assessment and Development Option Evaluation Study does not support major development at Stone Cross and does not justify the scale of new housing proposed in the Strategic Development Areas SD6 & 7. No justification has been given as to why the Council has departed from the Landscape Character Assessment and Development Option Evaluation Study which forms part of the Core Strategy evidence base. Sustainability Appraisal: The Council’s Sustainability Appraisal does not take full account of the findings of the Landscape Character Assessment and Development Option Evaluation Study regarding the Environmental Objective: Conserve, enhance and make accessible for enjoyment, the District’s countryside, landscape, historic and built environment as it relates to broad locations for development at Stone Cross. (p 76) Whilst the appraisal acknowledges that the east and southeastern locations raise landscape issues when considering new development and that this may reduce the developable area to facilitate the inclusion of buffer zones and edging techniques, the landscape assessment also identifies landscape constraints to west and north which are not acknowledged in the sustainability appraisal. (p76) Similarly, in considering the options selected and reasons (page 95) the sustainability appraisal states in relation to the selection of the east location that mitigation may be required in the form of landscape buffer zones and to ensure no adverse effects on the Eastbourne Levels. In relation to the selection of the southeast location mitigation for potential adverse landscape impacts and adverse impacts on the Eastbourne Levels will be required. However, the sustainability appraisal does not acknowledge the landscape constraints identified in the landscape assessment, the adverse impacts from development or the need for mitigation in the west and north locations, and is therefore flawed in this regard.

Details of Changes to be Made:

The scale of new housing proposed in Strategic Development Areas SD6 & 7 should be reconsidered with a view to reducing the amount of housing at Stone Cross and increasing the amount of housing in other parts of south Wealden including Hailsham and Polegate.
### Representation ID 339

<table>
<thead>
<tr>
<th>Person ID</th>
<th>Mr Stewart</th>
</tr>
</thead>
<tbody>
<tr>
<td>521879</td>
<td>St Richards Church</td>
</tr>
</tbody>
</table>

**WCS4 Strategic Development Areas**  
Policy 4

**Sound**  
- Yes
- No
- Justified
- Effective
- Consistent with national policy

**Legally Compliant**  
- Yes
- No

**Details of Reasons for Soundness/ Legal Compliance:**

The church supports the identification of the Jarvis Brook area for new housing at Crowborough although it believes that the allocation for the town should be greater. The church delivers both religious and secular services to its community and it is acutely aware of the deprivation in the area. As such it takes an active role, along with the local community group in providing services to the local area. The church premises itself is inadequate to cater for its needs and as a result has been looking for land to provide a new building for some time. The opportunity to deliver this and at the same time cater for the communities needs is an attractive one for the church to pursue. It is acutely aware that the public sector cannot fund this so the opportunity to achieve the community aims through development should be pursued. In this respect the church is concerned to ensure that the scale of development should be commensurate with the facilities that need to be provided. In its opinion this should be greater than the 300 allocated for the town. The church believes that the local community will welcome new development and the organisations which play an active role in nurturing the area wish to play a part in securing development which will improve the area's wellbeing and local economy. It is only by doing this that the vitality of the area can be sustained.

**Details of Changes to be Made:**

### Representation ID 352

<table>
<thead>
<tr>
<th>Person ID</th>
<th>Mr Burrough</th>
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</thead>
<tbody>
<tr>
<td>521930</td>
<td>Batcheller Monkhouse</td>
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</tbody>
</table>

**WCS4 Strategic Development Areas**  
Policy 4

**Sound**  
- Yes
- No
- Justified
- Effective
- Consistent with national policy

**Legally Compliant**  
- Yes
- No

**Details of Reasons for Soundness/ Legal Compliance:**

The identification of urban extensions is supported in principle. The policy identifies 12 Strategic Development Areas, all of which vary considerably in character. Not all Strategic Allocations may be capable of development, particularly that under designation SD1 (Uckfield). If these sites do not come forward, the Council has indicated that the Core Strategy will need to be reviewed. However this could interrupt housing supply. A contingency plan is therefore needed. Proposed Change

**Details of Changes to be Made:**

Council to supply explanatory text.
Details of Reasons for Soundess/ Legal Complaince:

Policy WCS4 indentifies land at West Uckfield as critical to the delivery of overall Core Strategy. This is amplified in paragraphs 6.3 – 6.11 and the plan at Figure 6. These allocated some 1000 homes and 12650sqm of net employment floorpace and education provision as an extension to the urban area to the west of 'New Town', subject to a suitable access and other detailed considerations. In considering the most appropriate location for growth around the periphery of Uckfield, the Background Paper ‘Development of the Proposed Submission Core Strategy’ assessed land to the north, east, south and west of the town. North Uckfield is relatively disconnected from the town centre and the majority of the existing community and development here has the potential to encourage car use to other settlements. This would fail to secure maximum benefits for the aspirations of town regeneration and would also have a potentially detrimental impact on the Ashdown Forest through increased emissions (which is the subject or protection under the Habitats Directives). It is therefore considered that additional housing development to the north of the Uckfield would not be justified or consistent with national policy. East Uckfield has road access constraints, due to capacity issues of Framfield Road and the town centre. It is therefore relatively inaccessible, despite its physical proximity to the town centre. This raises doubts over the deliverability of new housing in this area and an allocation would therefore not be justified or effective. West Uckfield is in large parts, visually prominent from the towns bypass. The area to the north is also in close proximity to the sewage works and this poses odour impact issues. Whilst the principle of development in this location is considered appropriate in principle, it is considered that large areas of this land are likely to be unacceptable for housing and employment development. This reflects the conclusion of the Landscape Character Assessment and Development Option Evaluation Study of October 2007. South Uckfield, around Mount Ephraim is relatively disconnected from the remainder of the town and development here would extend the built up area of the town along the A22 in ‘ribbon’ form. It does not represent the most effective or justified location for housing growth in the town. South-West Uckfield comprises the area surrounding Ridgewood House. It is bordered by the Millennium Green and recreation ground to the east, Ridgewood Stream to the south, Lewes Road to the west, and New Road and the built up area of the town to the north. It is in close proximity to local employment sites, formal and informal public open space and is readily accessible to the town centre along the Lewes Road, including by frequent bus services. It is visually contained by screening along its boundaries, including to the west and south. It is not visually exposed when viewed from the town’s bypass in the way that occurs with land to the west of Uckfield.

Development in this area would represent a logical addition to the periphery of the built up area and the site’s characteristics facilitate development that could readily assimilate into the adjoining built-up area. Green Infrastructure could also be provided in conjunction with residential development that would act a link between the open space to the east and land to the west, an aspiration of the PSCS.

Details of Changes to be Made:

Policy WCS4 should be amended to note that SD1 is an allocation for strategic development to the west and south west of Uckfield. Consequential changes should also be made to Figure 6 of the PSCS to note the broad area of the urban extension includes land to the south-west of Uckfield, encompassing land at Ridgewood House. Residential development in this location is both justified, effective when considered against alternatives, and consistent with national planning policy.
Representation ID

455

Person ID: Adams
Agent ID: 512699

WCS4 Strategic Development Areas
Policy 4

Sound
☐ Yes  ☑ No  ☐ Justified  ☐ Effective  ☐ Consistent with national policy

Legally Compliant
☑ Yes  ☐ No

Details of Reasons for Soundness/ Legal Complaince:
The development area SD2 is outside of Hailsham's development boundary. There is cause to be concerned about the ability of WDC to realise planning gain. There are already two significant development areas that have not been started, WD/2009/2705 (previously WD/2007/2856/MAO) and WD/2009/1780 with a total housing capacity of 298 in tightly packed and frankly unattractive configurations. Overall there is currently a capacity of around 1100 not-yet-built dwellings in Hailsham and Hellingly. Hailsham currently offers some of the cheapest new builds in the district: with 7 major sites developers will be even slower than usual in releasing dwellings in an attempt to re-establish profits. Given the caveats outlined in the Core Strategy Infrastructure Delivery Plan why is this allocation of further housing sought at this time? I trust the planning inspector will ask the same question.

Details of Changes to be Made:

Sound
☐ Yes  ☐ No

Legally Compliant
☐ Yes  ☐ No

Representation ID

1670

Person ID: Wel
Agent ID: Ms Yarker

WCS4 Strategic Development Areas
Policy 4

Sound
☑ Yes  ☐ No  ☐ Justified  ☐ Effective  ☐ Consistent with national policy

Legally Compliant
☐ Yes  ☐ No

Details of Reasons for Soundness/ Legal Complaince:
It is WSL's intention to promote Ridgewood Farm as an urban extension to the west of Uckfield in accordance with Policy WCS4. to this end, WSL acknowledges the infrastructure requirements that the Council envisages and the timing for the delivery of strategic development set out in paragraphs 6.3 - 6.11 of the document. WSL intends to work with the Council in order to deliver a comprehensive development that includes agreed infrastructure requirements. It is also the intention of WSL to work with the Council to commence the delivery of strategic development by 2016, in accordance with paragraph 6.11 of the Porposed Submission Core Strategy. WSL is confident that its master plan exercise will demonstrate the suitability, availability and ultimate deliverability of this site for strategic development. To this end, WSL is also confident that the master plan work will demonstrate that any matters raised through this consultation exercise can be positively addressed and therefore will not affect the deliverability of Ham Farm for strategic development.

Details of Changes to be Made:
Details of Reasons for Soundess/ Legal Complaince:

3.0 Policy WCS4: Strategic Development Areas Representation 3.1 We object to the content of the Policy as drafted on the basis that it has not been shown to be justified, effective or consistent with national policy. 3.2 The target figure of 9,600 dwellings to be met within the District during the period 2006 to 2030 is significantly lower than the strategic requirement set out in the South East Plan (adopted May 2009) and fails to address identified needs. This requires additional housing allocations to address identified needs. 3.3 Separate but related objections have been submitted in response to Policies WCS1 and WCS2 and these are of relevance in assessing the appropriateness of Policy WCS4 as drafted.

Details of Changes to be Made:

3.4 We object to the omission of land to the west of Station Road, south of Hailsham as a Strategic Development Area under Policy WCS4. The site should be identified as a “SD” for around 150 dwellings. Consequential changes should be made to paragraphs 6.12 to 6.20 of the supporting text.
3.3 Infrastructure Delivery

3.3.1 This section of our representations refers to policies WCS2 and WCS4. It is summarised below: Section of Core Strategy: Policy WCS2 Distribution of Housing Growth 2006-2030, and WCS4 Strategic Development Areas.

Legally Compliant: -Sound: No -Justified: No -Effective: Yes -Consistent with national policy

Details of Reasons for Soundess/ Legal Complaince:

3.3.3 The Proposed Submission Core Strategy acknowledges these uncertainties, for example in relation to delivering the proposed levels of growth at Hailsham / Hellingley and Polegate/Stone Cross / Willingdon and states: "The infrastructure requirements for the delivery of development and growth in Hailsham provides an element of risk for the delivery of the spatial strategy." (para 6.20) "The risk to delivery of this strategy relates to the highways infrastructure required for the South Wealden area, in order to mitigate the impact on the strategic routes and more localised junctions." (para 6.32). 3.3.4 A review of the Wealden IDP reveals the extent of this uncertainty, with the following transport schemes all classified as critical to ensure delivery of development in the South of the district. None have identified funding, other than as yet uncommitted developer contributions and /or unconfirmed Highways Agency / East Sussex CC funding. South Polegate and East Willingdon 1. Signals at Cophall Roundabout 2. Improvements at junctions between A22 Jubilee Way and A27 and Dittons Road and 3. Junction improvements at A22/ A27 / A2270 intersection Junction improvements at the A2270 and Polegate High Street and at the A2270 and Wannock Road. 4. Improvements to Hempstead lane junction to alleviate traffic congestion on the A271 and Hailsham Town Centre. 5. Junction improvements at the A2270 and Polegate High Street and at the A2270 and Wannock Road. Hailsham 1. Hailsham - Relieve town centre congestion and stress at Battle Road and London Road through re-routing traffic to Summer Heath Road, including signalised junctions 2. Hailsham - Relieve town centre capacity issues through signal improvements at Battle Road / London Road and North Road / High Street junctions 3. Hailsham - A2270 and A259 Quality Bus Corridors and Eastbourne - Hailsham express bus service. 3.3.5 The first two schemes listed in relation to South Polegate and East Willingdon are on the Strategic Highway network and would therefore be expected to be at least part funded by the Department for Transport. At present none of these schemes are included within the DfT’s forward programme to 2015 or in the list of schemes under review for possible funding post 2015. The IDP assumes that all schemes will be partly reliant on developer funding through planning obligations. However, it does not provide any cost estimates for these schemes and consequently it is not possible to assess the potential scale developer contributions that may be sought, and their implications for viability (taking account of other potential claims on developer contributions including affordable housing and education). As such it is not possible to ascertain whether or not there is a reasonable prospect of delivery of the schemes in question.

3.3.6 PPS12 acknowledges that information on funding and delivery may not always be available at the time the Core Strategy is prepared. However it goes on to state: It is important therefore that the core strategy makes proper provision for such uncertainty and does not place undue reliance on critical elements of infrastructure whose funding is unknown. The test should be whether there is a reasonable prospect of provision. Contingency planning – showing how the objectives will be achieved under different scenarios – may be necessary in circumstances where provision is uncertain. (PPS, para 4.10) 3.3.7.5 of the proposed submission Core Strategy which states that due to ‘potential unforeseen infrastructure constraints, which may prevent housing being delivered, this plan contains contingency arrangements in the towns in the event of housing delivery substantially falling behind the trajectory’. However, it is not evident what these contingency arrangements will be, other than a review of the Core Strategy. 3.3.8 We contend that a review of the Core Strategy in itself does not provide a sufficiently flexible mechanism for responding to delays in the provision of critical infrastructure jeopardising housing and employment delivery. This is of particular relevance to the delivery of a number of the Strategic Development Areas which are considered critical to the delivery of the overall strategy (Policy WCS4); specifically: 1. SD2: Land and East Hailsham (600 dwellings) 2. SD3: Land at North Haisham (700 dwellings) 3. SD4: Land at South Polegate and East Willingdon (700 dwellings) 4. SD5: Land at Ditton Rd Polegate (employment) 5. SD6: Land at East and South East Stone Cross and SD7: Land at North Stone Cross (650 dwellings) 3.3.9 Together, these account for 2,650 dwellings. The Core Strategy states that the
Council have already identified around 4,889 dwellings. This leaves 4,711 dwellings to be provided on other sites across the district. Therefore the five sites listed above account for more than half of the uncommitted housing supply over the plan period. Non-delivery of these units will thus undermine the housing trajectory and spatial distribution in the Core Strategy, requiring alternative housing sites to come forward elsewhere. In order to mitigate this risk, the Council should revised its spatial strategy and housing trajectory so that it is less dependent upon sites which remain dependent upon infrastructure for which costs and funding sources have yet to be identified and highly uncertain. The spatial distribution of housing and growth across the district thus needs to be reviewed and amended accordingly.

**Details of Changes to be Made:**

**SUMMARY 3.3.10** In summary we contend the Core Strategy is unsound on the grounds that it is not effective as it is not sufficiently flexible to respond to identified uncertainties surrounding the provision of infrastructure acknowledged by the Council as being critical to its delivery.

<table>
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<tr>
<th>Representation ID</th>
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<th>Agent ID</th>
<th>Sound</th>
<th>Legally Compliant</th>
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<tr>
<td>Mr Evison</td>
<td>Mr Evison</td>
<td>Hailsham St Mary Parochial Church Council</td>
<td>Mr Evison &amp; Company</td>
<td>Yes</td>
</tr>
</tbody>
</table>

**Details of Reasons for Soundess/ Legal Complaince:**

The proposals for further population growth at Hailsham including urban extensions east (Policy SD2) and north (Policy SD3) of Hailsham are supported. The proposals themselves will create critical mass to provide economic and social benefit to the town. To maintain the viability of such large scale development, care should be taken to avoid excessive development contributions and to adhere strictly to the principles of Circular 05/05 namely that obligations must be: 1. relevant to planning ii necessary to make the proposed development acceptable in planning terms iii. directly related to the proposed development iv. fairly and reasonably related in scale and kind to the proposed development; and v. reasonable in all other respects. Given the scale of development and the lead time to first occupations where significant infrastructure works are required the respective 2017 and 2021 dates should be brought forward and treated with flexibility to ensure that planning permissions are granted well in advance of those dates in order to ensure completions in good time and so maintain housing land supply.

**Details of Changes to be Made:**
Summary of all Representations - Proposed Submission Core Strategy Regulation 27 - Report 11th July 2011

Representation ID
1714

Person ID Gall Heron Land Developments Ltd. Agent ID Mr Groves
107752 102592 Boyer Planning Limited

WCS4 Strategic Development Areas Policy 4

Sound ☐ Yes ☑ No ☐ Justified ☑ Effective ☑ Consistent with national policy
Legally Compliant ☑ Yes ☐ No

Details of Reasons for Soundess/ Legal Complaince:
The allocation of site SD1@ land at west Uckfield is considered to be unsound as it is not justified or effective. 3.5. WCS4 Strategic Development Areas 3.5.1. The policy identifies twelve strategic development areas as broad locations for future development. In the light of our clients' landholding at Uckfield our comments relate to site SD1: Land at West Uckfield. It is considered that the allocation of the site as a strategic development location is unsound. This element of the Core Strategy is felt to be unsound as it is not justified or effective. 3.5.2. Paragraph 5.211 of the document states that the Council recognises that it needs to identify a "delivery" supply of housing land for both the short-medium and the longer term. The Strategic development areas are of such a scale that they are considered "critical to delivery of the overall strategy". Paragraph 5.12 goes on to note that the strategic development areas will be priority for inclusion in the Strategic sites DPD, in line with the housing trajectory and to ensure "delivery". The delivery of housing is recognised by the Council as key, and we agree as this accords with advice in PPS3. However in the case of SD1 as we note below, the evidence does not support an allocation as there appear to be many obstacles to its delivery. 3.5.3. In contrast, through its assessment of sites, the Council has considered that land on the east side of Uckfield, at Bird in Eye in South, the Inspector considered the site proposed at that time for 197 dwellings, to be a "natural or logical urban extension". 3.5.4 We consider how the Council has reached a conclusion in support of a strategic allocation SD1 following consideration of the Uckfield area strategy.

Details of Changes to be Made:
3.5. WCS4 Strategic Development Areas 3.5.1. The policy identifies twelve strategic development areas as broad locations for future development. In the light of our clients' landholding at Uckfield our comments relate to site SD1: Land at West Uckfield. It is considered that the allocation of the site as a strategic development location is unsound. This element of the Core Strategy is felt to be unsound as it is not justified or effective. 3.5.2. Paragraph 5.211 of the document states that the Council recognises that it needs to identify a "delivery" supply of housing land for both the short-medium and the longer term. The Strategic development areas are of such a scale that they are considered "critical to delivery of the overall strategy". Paragraph 5.12 goes on to note that the strategic development areas will be priority for inclusion in the Strategic sites DPD, in line with the housing trajectory and to ensure "delivery". The delivery of housing is recognised by the Council as key, and we agree as this accords with advice in PPS3. However in the case of SD1 as we note below, the evidence does not support an allocation as there appear to be many obstacles to its delivery. 3.5.3. In contrast, through its assessment of sites, the Council has considered that land on the east side of Uckfield, at Bird in Eye in South, the Inspector considered the site proposed at that time for 197 dwellings, to be a "natural or logical urban extension". 3.5.4 We consider how the Council has reached a conclusion in support of a strategic allocation SD1 following consideration of the Uckfield area strategy. 4.1 In summary we recommend that the following changes be made to the Core Strategy:- 1. Policy WCS4 - the inclusion of an additional strategic development area - SD: Land at Bird in Eye South, Uckfield. 2. Policy WCS4: the inclusion of strategic development area - SD1: Land at West Uckfield, only following further investigations and with a substantial reduction in the number of dwellings to a figure that reflects certainty of the deliverability of that number. 3. Figure 5. Phasing of Development - the phasing schedule to be amended to reflect the above, to include Bird in Eye South for 200 dwellings, and assign it to years 2013/14 - 2016/17 for delivery. 4. Chapter 6 - Uckfield area strategy: this subsection should reflect the above, in particular at para 6.11 to include Bird in Eye South for 200 dwellings as well as through amendments to Figure 6: Uckfield Area Strategy.
Representations on behalf of the Clarence Preston Will Trust: Policy WCS4 These representations are on behalf of the Clarence Preston Will Trust, freehold owners of Downlands Farm, Uckfield. While the selection of Uckfield as a location for further strategic growth with a new allocation of 1,000 dwellings in Policy WCS2 is strongly supported, the identification of a sole strategic development area at "West Uckfield" is not justified, is unlikely to be effective and would be contrary to national policy in its environmental and landscape impact. The selection of the proposed development area SD1 West Uckfield is based, so far as can be judged from the published background papers, on a fundamentally flawed approach to the assessment of the strategic development options for for Uckfield. For each town "broad locations" have been assessed and compared against each other and against sustainability criteria. The broad locations for Uckfield, however, exclude one of the principal potential areas, Downlands Farm, which in the non-site-specific CS vocabulary can be called North West Uckfield. Figure 1 of the Development of the Proposed Submission Core Strategy Background Paper shows that four broad areas were appraised: North, West, East and South Uckfield respectively. The broad north-west sector (principally Downlands Farm) is not included in the appraisal. There is no explanation for this. The site was subject to a planning appeal (together with sites at Bird-in-Eye Hill) which was dismissed and the site was subsequently deemed “unsuitable” in the SHLAA. However, this is not sufficient reason for omitting it from consideration altogether. The Bird-in-Eye sites were considered under the heading “East Uckfield”. Circumstances have changed since the appeal determination and the SHLAA, which based its conclusions substantially on the appeal decision. The requirements for broad location selection for CS purposes, differ from the considerations in appeal decision in the following critical respects: 1. The appeal was determined on the basis that a major peripheral expansion of Uckfield was not in accordance with the South East Plan. The draft CS is not being prepared in relation to the South East Plan and it proposes a major peripheral expansion of Uckfield, albeit in a different location. 2. The housing land supply position for the CS period is wholly different from the basis on which the appeal was determined. 3. The landscape conclusions in the appeal were in comparison with the sites at Bird-in-Eye Hill not with West Uckfield. There should have been a comparative landscape assessment between Downlands Farm/North West Uckfield and West Uckfield for the purpose of broad location selection in the CS process. There has been none (at least in published form) and this is a fundamental failure of the process that is highly prejudicial to the land at North West Uckfield. 4. Similarly with highways and ecology. There has been no proper comparison in the location selection process between the two main competing locations at Uckfield. The SHLAA report for Downlands Farm refers directly to the appeal decision. It is clear that there was no detailed re-examination of the comparative merits of all the major alternative strategic development locations around Uckfield. On the site specific issues, the SHLAA report gives only a superficial picture. For example, it concludes that the development of Downlands would “compromise its nature conservation integrity and biodiversity interests” whereas the inspector’s conclusion was that permission should not be refused outright on the basis of harm to its ecology or biodiversity.

Details of Changes to be Made:
There are landscape issues affecting both West Uckfield and North West Uckfield. These have not been compared in the CS process. The Council’s own comparative landscape analysis in 2001 concluded for West Uckfield (then referred to as Sector 3) “The broad, rolling landform ensures that most of the landscape is clearly visible and any large-scale development is likely to have a widespread influence, particularly along the elevated ridge-tops where it would impact upon the surrounding countryside”....“The characteristic open, visually exposed and rural qualities of this landscape make it highly sensitive to any form of significant new development”.

The SHLAA report concluded that approximately two-thirds of the site is considered unsuitable for housing in view of the harmful effect it would have on the landscape. The choice between these two peripheral sectors of Uckfield for urban extensions should have been subject to rigorous comparative analysis. That has not taken place and the Council has relied on the findings of a planning appeal that was held in an entirely different context and where the comparative merits of West Uckfield were not a matter for consideration. The omission from consideration of one of the main undeveloped peripheral sectors of Uckfield, particularly one with a complex planning history, is a significant failing in the draft document. These process failings render the CS Policy WCS4/SD1 unsound. To avoid compromising the CS as a whole, an option would be for the Council to redraft SD1 in more general terms without specifying locations or sectors at Uckfield. This would leave the detailed comparative site analysis where it should properly be, namely at site specific DPD stage. As a general comment, the way the Council has dealt with
the housing distribution issue is closer to site specific allocation than it should be at Core Strategy stage of the LDF process.
Summary of all Representations - Proposed Submission Core Strategy Regulation 27 - Report 11th July 2011

Representation ID
1701

Person ID  Mr Herbert
107737

Agent ID  Mr Herbert
522234

WCS4 Strategic Development Areas
Policy 4

Sound
☐ Yes  ☑ No  ☑ Justified  ☐ Effective  ☑ Consistent with national policy

Legally Compliant
☐ Yes  ☐ No

Details of Reasons for Soundess/ Legal Complaince:

7 Landscape 7.1 Introduction 7.1.1 In this section of the report we present our representations in regard to landscape matters in and informing the Core Strategy. Our representation is made in regard to paragraphs 3.30 – 3.33 of the submission Core Strategy, Policies WC4 and WC13 and supporting background papers. 7.1.2 For the purposes of this representation we have reviewed the ‘Landscape Character Assessment and Development Option Evaluation Study’ undertaken for the district (referred hereinafter as the ‘Landscape Study’), which is included as a background paper to the Core Strategy on the Councils website. However, it is not clear how the Landscape Study has been used to inform the spatial strategy as it is not specifically referred to in the text of Core Strategy nor is the Landscape Study listed as a background paper at paragraph 1.7 of the Core Strategy (although it is included as a background paper on the Councils website). 7.1.3 We have reviewed the methodology set out in the document and we have also reviewed whether the methodology has been consistently applied resulting in a final report that is robust, thorough and transparent and one that would form a credible evidence base suitable to inform the spatial strategy contained in the Core Strategy. 7.1.4 We contend that the Landscape Study is flawed and therefore the assessment of housing sites in the district, the spatial strategy and the Councils Sustainability Appraisal, and thus the Core Strategy, is unsound. 7.1.5 Our representation is summarised below:

Section of Core Strategy: Spatial Planning Objectives 1, 3 and 11, Paras 3.30 - 3.33, Policy WCS4 Strategic Development Areas, Figure 6 Uckfield Area Strategy, Paras 6.9 and 6.11, Policy WSC13 Green Infrastructure, Paras 7.23 - 7.28Legally Compliant: -Sound: NoJustified: NoEffective: -Consistent with national policy: No Proposed Submission Core Strategy Paragraphs 3.30 – 3.33 7.1.6 Paragraph 3.30 of the Proposed Submission Core Strategy refers to Wealden’s environmental attributes and that they have an important part to play in the development of the spatial strategy and ‘had a significant impact upon the assessment of the suitability of housing land in relation to the SHLAA’. 7.1.7 Paragraph 3.30 goes on to state that: “...and sites have been carefully scrutinised with regards to landscape impact.” 7.1.8 Paragraph 3.33 refers to Government guidance and the level of protection this provides for the environment, particularly nationally and internationally designated sites, which are not duplicated in the Core Strategy. The paragraph goes on to state: “However, our strategy has been guided by high levels of protection on local and national levels, and more detailed policies are contained within the Core Strategy and further ones in subsequent DPDs.” 7.1.9 Paragraph 1.7 in the Introduction to the Core Strategy refers to a number of specialist studies that have been produced to provide a robust evidence base to inform the Local Development Framework. The Landscape Study is not listed as a background paper at paragraph 1.7 of the Core Strategy (although it is included as a background paper on the Councils website). Policy WCS4 Strategic Development Areas and Paragraphs 6.9 and 6.11 7.1.10 The Core Strategy proposes that the land to the west of Uckfield be identified as a ‘strategic development area’ suitable for accommodating 1,000 homes and some 12,650 sq metres of employment floor space and education provision as an extension to the urban area to the west of New Town. Paragraph 6.9 refers to the SHLAA and assessment of the potential sites at the fringes of the urban area. 7.1.11 In the light of the comments that follow in this section of our representations on the Landscape Study, it considered that this proposal be reassessed and, taking into account other representations made on other parts and policies contained in the Core Strategy, greater emphasis should be given to the suitability of land at Maresfield to accommodate increased housing numbers and a larger proportion of the housing requirements for the district. Policy WSC13 Green Infrastructure, Paragraphs 7.23 - 7.28 and Background Paper BP6 7.1.12 Policy WSC13 and paragraph 7.23 to 7.28 relating to Green Infrastructure is supported although it is considered that the anomalies and errors in the Landscape Study be addressed before this document is used to inform and guide the implementation of Green Infrastructure Strategy and also formulation of the specific measures for the protection and enhancement of the landscape which are to be set out in the Delivery and Site Allocations DPD referred to at paragraph 7.28 of the Core Strategy. 7.1.13 It is not clear from reading the Core Strategy, how the Landscape Study has been used to inform the above policies. 7.2 Consideration of the Methodology employed in the Landscape Study 7.2.1 Wealden Council commissioned the Landscape Study from the Landscape Group at East Sussex County Council, in September 2007. It was published in February 2009. The purpose of the Study is to: 1. Inform the preparation of WDC Local Development Framework Core Strategy and; 2. Inform the development policies on landscape management and protection. 7.2.2 The Landscape Study states that it will: 1. Assess the existing landscape character of key search areas 2. Assess the quality and value of the existing landscape in these key search areas 3. Assess the sensitivity if the existing landscape and its capacity to accept change or having regard to the scope for mitigation 4. Make recommendations on preferred locations from a landscape...
Summary of all Representations - Proposed Submission Core Strategy Regulation 27 - Report 11th July 2011

perspective. 7.2.3 The Landscape Study purports to use a number of methodologies for the assessment and identifies these as being: 1. For Landscape Character/ Quality and Value - Design Manual for Roads and Bridges Vol 11, section 3, Part 5 (DT) which has been further refined by the Landscape Character Assessment Guidance for England and Scotland (CA/SNH 2002) and; 2. For landscape sensitivity – Landscape Character Assessment Guidance for England and Scotland, Topic Paper No.6: Techniques and criteria for Judging Capacity and Sensitivity (CA 2002). 7.2.4 The Landscape Study sets out, in section 2.0, the methodology and criteria used for each aspect of the landscape being assessed, including the following: 1. Landscape Quality (this should be ‘condition’ if following latest LCA guidance as the term quality is now a discredited approach to assessing landscapes) 2. Landscape Value 3. Landscape Sensitivity 4. Visual Sensitivity 5. Landscape Capacity 7.2.5 In relation to the assessment of landscape capacity, capacity is defined in Topic Paper No.6: ‘Techniques and Criteria for Judging Capacity and Sensitivity’ as: ‘The degree to which a particular landscape type or area is able to accommodate change without significant effect on its character, or overall change of landscape character type. Capacity is likely to vary according to the type and nature of change being proposed’. 7.2.6 We have reviewed the Landscape Study, in particular, the methodology set out in the document and whether this has been consistently applied to form a credible evidence base suitable to inform the spatial strategy contained in the Core Strategy. 7.2.7 The review of the Core Strategy background paper indicates that the Landscape Study has not followed the guidance in Topic Paper No.6. Topic Paper No.6 suggests that there are two approaches to assessing landscape sensitivity. These are: 1. Judging Overall Landscape Sensitivity and; 2. Judging Landscape Sensitivity to a specific type of change. 7.2.8 However, in order to assess landscape capacity, the assessment of the sensitivity of different types or areas of landscape to the type of change in question must be combined with an assessment of the more subjective or perceptual aspects of the landscape and of the value attached to the landscape. 7.2.9 The stages for assessing landscape capacity are set out in Section 3.0 of Topic Paper No.6 and reproduced in Figure 7.1 below. Figure 7.1: Stages for assessing landscape capacity Source: Landscape Character Assessment Guidance for England and Scotland, Topic Paper No.6: Techniques and criteria for Judging Capacity and Sensitivity (CA 2002). 7.2.10 Sections 5.0 and 6.0 of Topic Paper No.6 provide the more detailed considerations that need to be taken into account. 7.2.11 The boxed text, at paragraph 2.11.2 of the Landscape Study, follows the same assessment stages used to assess the landscape capacity to accommodate a specific type of change and given the local scale of the assessment work it is considered that this is the appropriate method to use. 7.2.12 However, Topic Paper No.6, at paragraph 6.5, also goes on to state that: ‘Capacity is all a question of the interaction between the sensitivity of the landscape, the type and amount of change and the way that the landscape is valued’. 7.2.13 Sections 2.11 and 2.12 of the Landscape Study set out the approach used by East Sussex County Council landscape group in undertaking the landscape study. However, the assessment does not define the quantum of housing development used to assess the capacity of each character area, nor is the LDF Core Issues and Options Consultation Paper July 2007 referred to as a guide to the quantum of housing development used to assess each of the different character areas. The Landscape Study does however state at paragraph 2.12.3 that: ‘an overall assessment can be made for each character area on the capacity to accept the type of change being considered. This judgement is made according to the combination of characteristics that contribute to a particular area of landscape. The capacity of an area to accept change is related to the potential of the area to accommodate development in a particular location without detracting from the overall character of that landscape. The capacity evaluation of each character area does not assume that this is the capacity across the entire character area’ 7.2.14 There are a number interrelated issues raised in the above paragraph which we now turn to. 7.2.15 In relation to the type of change, the Landscape Study defines, at paragraph 2.12.6, the assumptions used for the assessment business uses, i.e. the assessment of sensitivity / capacity is based on light industrial type uses which would be consistent with a residential environment and these would be single storey units. However the Landscape Study does not define the full details of the housing use, such as type (housing - single storey / two storey / three storey etc) or amount (large / medium / small scale development) and we contend that the details of the change being considered is not transparent from the Landscape Study, as although the type of change (i.e. housing) is known, the form and amount of housing is unknown. These are important factors when considering the landscape capacity of an area to accommodate development, especially if using the stages set in the Landscape Study. 7.2.16 A similar assumption to the business use (or range of assumptions) could have been used for assessing the impact of housing on landscape sensitivity / capacity of each character area. For example two to three storey houses at the following ranges: 1. small scale housing between five to 50 dwellings 2. medium scale housing development between 50 to 200 dwellings, and 3. large scale housing development between 200 to 500 dwellings. 7.2.17 In relation to the combination of the characteristics that contribute to a particular area, comments on these are made in later sections (See paragraphs 7.4.1 to 7.4.14 below). 7.2.18 The Landscape Study also refers to mitigation and management of the landscape (Section 2.13) and, in paragraph 2.13.1, it highlights that mitigation has been used to determine the visual and character sensitivity of the landscape. This approach does not accord with Topic Paper No.6 as mitigation should only be used to inform the visual sensitivity of the area assessed, (See Figure 7.1 above), and not directly the character sensitivity of an area (although visual aspects are one of the aspects that inform the character of an area). Mitigation in itself can have a significant effect on character and the landscapes capacity to accommodate development. In some cases mitigation would make an area less suitable to accommodate development not more suitable. Again this, we would contend, is a flaw in the assessment. The existing management of the landscape is relevant to determining the condition (or quality) of an area of landscape...
but the identification of management opportunities is not relevant to determining the capacity of the landscape to accommodate development. Management of the land could in itself bring about a change to the landscape which is discordant with its character, for instance managing the land to encourage woodland growth or planting extensive woodlands in a very open exposed landscape would lead to a significant change. 7.2.19 The methodology section of the Landscape Study also includes a part dealing with the Areas of Outstanding Natural Beauty (AONB) within the district. Section 2.14 refers to ‘AONBs and AONB Buffer Zones’ as a way of identifying higher value landscapes within Wealden. At paragraph 2.14.2 the Landscape Study states: ‘There is, in some areas adjacent to the AONB boundary a buffer zone to the AONB landscape. This is usually an area of similar character but not of the same quality as the AONB landscape and not covered by the same planning policy. Where relevant these areas are indicated in the figures’. 7.2.20 Paragraph 2.14.4, the Landscape Study goes on the state the following: ‘These buffer zones have been identified through the character area analysis. The relative sensitivity of these areas has been considered according to the landscape character to achieve a balanced comparison with AONB and AONB landscapes’. 7.2.21 The Landscape Study considers that there is support for this ‘buffer zone’ approach due to Policy EN2 (f) of the East Sussex and Brighton and Hove Structure Plan. We contend that this approach is flawed and unsound. Firstly, the Structure Plan has been superseded by the South East Plan and at the time of preparing the Landscape Study during the period August 2007 to February 2009, both East Sussex Council and Wealden District Council would have been aware of the emerging South East Plan policies through the draft regional plan. Secondly, Policy EN2 (f) does not prohibit development but seeks to protect the Sussex Downs and High Weald AONBs and minimise the impact of development within them by requiring measures to integrate the development in to the landscape. Thirdly, there is no Government policy support for the concept of ‘AONB buffers’ in Planning Policy Statement No.7. Like Policy EN2 of the Structure Plan, PPS 7 does not prohibit development within the boundaries or adjoining an AONB but merely seeks to ensure that the landscapes within AONBs are considered carefully and appropriate measures taken to mitigate the harm that potential development may cause. 7.2.22 The fourth point is that, whilst the Council would seek support from Policy EN2 (f) as a way of ‘balancing the comparison between AONB and non AONB areas’ especially the areas of landscape close to the AONB boundary, the East Sussex and Brighton and Hove Structure Plan does not define the extent of the buffer zone on the Key Diagram nor is the extent of the buffer area set out in its explanatory text. We contend that the justification for this approach must be given very little weight. 7.2.23 Lastly, it is acknowledged that some areas of landscape within an AONB may be of poorer condition (quality) score and / or lower visual and character sensitivity than areas outside of the AONB but the adjustment in the landscape sensitivity / capacity scoring by introducing what appears to be an arbitrary AONB buffer zone seems to undermine the purposes and status of the AONB designation,(and its planning policy protection), by attaching increased value to a character area that adjoins the AONB which although it may be of a similar character, does not meet the quality criteria for inclusion within the AONB. In addition, it is noted that the Landscape Study has not been subject to peer review and there is no evidence that it has had stakeholder input / consultation with statutory consultees, such Natural England / High Weald AONB Joint Advisory Committee and other interested bodies to agree this approach to the AONBs. 7.2.24 The Study goes on to set out the method used to undertake a comparative evaluation of a potential development area within a character area which has capacity to accommodate development. This gives an early indication of sites which would be worthy of further consideration for development in landscape terms. We contend that the comparative assessment of character areas within the District is flawed as the starting point for the assessment the landscape sensitivity / capacity analysis is unsound for the reason given above. 7.2.25 Notwithstanding the above point, Section 2.15.4 of the Landscape Study states that: ‘Prior to coming to a firm view on the full potential and scope in these areas further investigation would be required’. 7.2.26 However, the Study does not present evidence of this further investigation or how preferred development areas have been chosen; for example there is no detailed assessment of the west of Uckfield area although this has been identified as a major urban extension area under Policy WCS4 - SD1. 7.3 Critical Review of the findings of the Landscape Study 7.3.1 The Landscape Study methodology sets out how each landscape character is to be assessed and the information recorded using landscape character assessment sheets (section 2.5) whilst section 2.17 of the Landscape Study refers to mapping which is split into two stages. Stage 1 relates to recording baseline information on each character area such as planning designation, Public Right of Way and key viewpoint, focal point, landscape features and detractors (which should be read with the assessment record sheets). Stage 2 relates to the identification of potential development areas with indicative boundaries and also identifies key woods, shaws, hedges, tree belts etc and also the potential for mitigation planting. 7.3.2 In order to assess the robustness of the landscape capacity study for the purpose of this representation, the area around Uckfield, Maresfield and Five Ash Down were visited and the baseline information recorded on the landscape assessment sheets checked and the judgements reached reviewed. This check revealed that that were a number of elements / features not recorded or identified for some areas and therefore these factors were not able to inform the judgement reached. 7.3.3 For example, ‘Maresfield Area A’, is described as: ‘An open, undulating landscape used for pasture to the west and pleasure to the east. It is ungrazed showing some scrub. Wide long views to the south. Surrounded on other sides by mature trees and exotic Eucalyptus and Cedars from nearby Park. Fine houses on outskirts and within site. Fine clumps of Pines. Some road noise adjoins picturesque recreation ground’. 7.3.4 The assessment sheet omits a number of important features such as areas of woodlands and plantations, (some of which are ancient woodlands and provide screening, containment and form visual barriers). Hedges, fences, footpaths and reference to the bypass were not recorded. The assessment sheet also
refers to parkland and that the majority of the land is amenity land lacking management. A wide long view(s) out to
the south is highlighted as a key feature which is correct when looking south from a small part of the area but
elsewhere views are contained and obscured by landform and vegetation. The record sheet includes a photograph
of the view south but this is not taken from the recreation ground as recorded on the map Figure 52. The
photograph was taken from private land on the footpath. 7.3.5 In the visual appraisal section of the assessment
sheet it records the local receptors as amenity land and houses, types of view as long views from top of ridge to
the south and visual barriers as landform / trees and hedges. It concludes that the sensitivity is high (see table 7.1
below). It is acknowledged that there are views within the area but these tend to be short partial or glimpsed views
with long views out towards the south from high ground in the north eastern parts of character area. Views into the
area are very limited and development within the area would have a minimal impact on views. However, in views
from the ridge to the south the recreation occupying the north eastern parts of the character area is seen whilst the
remaining areas are hidden from view and therefore the visual sensitivity of the majority of the area is low. 7.3.6
The resultant evaluation of this area was considered as follows: Table 7.1: Landscape Study Assessment,
Maresfield Area A Character Area Maresfield A Quality Good Value Medium Sensitivity to Change Moderate
Visual Sensitivity High Management Opportunities Mange hedges and grazing. Mange recreational spaces and
access to countryside. Need to retain gap between Maresfield and Uckfield. Potential forMitigation Low Planting
would change open character and obscure long views out from recreation ground Capacity to Accept Change:
Housing Low Close to village edge only Capacity to Accept Change: Business Low 7.3.7 We contend that the
record sheets are incorrect and the judgement on quality / condition is erroneous and should be ‘ordinary’ as most
of the land is unmanaged comprising rank grassland of little intrinsic landscape value and the visual sensitivity of
the area is ‘moderate or low’ due to the strong enclosure afforded to the area. It is interesting to note that one of
the management opportunities is to retain a gap between Maresfield and Uckfield although there is no planning
policy support for the retention of gaps in the Core Strategy or previous Non Statutory Wealden Local Plan. 7.3.8
By comparison, another example is Character Area L – land to the west of Uckfield, which is described as: ‘Land
sloping away from urban edge to Uck valley and A26 Uckfield by pass. Strong field structure with arable and
pasture. Some large fields. Sewage works detractors. Few focuses of character. Development would need a well
defined edge to prevent creep’. 7.3.9 The assessment sheet for this character area has recorded the land cover
and landscape elements correctly but has not recorded any landform features and relatively few aesthetic factors,
although it describes the land as sloping away from the urban edge with a strong field structure with arable and
pasture. The landscape condition is considered to be fair which is not defined in the methodology although this
changes to ordinary in the comparison table. 7.3.10 In the visual appraisal section of the assessment sheet it
records the local receptors as countryside on the other side of Uck Valley, isolated properties, footpaths and A26
and houses on the urban edge, types of view as views across to woods at West Park / Butchers Wood, wooded
ridge of Shortbridge across Uckfield Valley and visual barriers as few. It concludes that the sensitivity is ‘moderate’
(see table 7.2), Table 7.2: Landscape Study Assessment, Uckfield Area L Character Area Uckfield L Quality
Ordinary Value Medium Snow Accessible for recreation Sensitivity to Change Moderate Visual Sensitivity Moderate
High on ridge Management Opportunities Mange urban fringe. Farm diversification pressure. Manage wood and
existing trees and hedges Potential for Mitigation Moderate Low on ridge as need to retain open fields. Soften urban
decay. Create green network. Relocate recreation ground Capacity to Accept Change: Housing Moderate Need well
defined boundaries close to urban edge avoid high ground Capacity to Accept Change: Business No capacity
7.3.11 We contend that the record sheets are incorrect and the judgement on quality / condition is under estimated
and should be ‘good’ as most of the land is attractive farmed landscape with some distinctiveness features with a
recognisable landscape structure. The assessment sheet ignores the open exposed nature of this character area,
with long views south and west and numerous views in to the area from the surrounding countryside (roads and
footpaths), and therefore the visual sensitivity of the area should be ‘high’ due the number of viewpoints where
views can be obtained. This can be compared to the Maresfield A area which is considered to have ‘high’
sensitivity rating but with a few vantage points available where development impacts will be perceived. 7.3.12 We
also note that under management opportunities it is considered that the area could contribute to managing the
urban fringe, which could equally apply to the land at Maresfield, and that under the potential for mitigation heading
is considered that the area has a ‘moderate’ ability, although the introduction of mitigate planting as shown Figure
11 of the landscape Study would dramatically and significantly change the landscape character of the area. 7.3.13
These examples illustrate the inconsistency of the landscape assessment record sheet and the arbitrary nature of the
judgements made. It does not give any confidence to the manner in which the Landscape Study has been
undertaken or to the transparent way that the judgements have been reached. 7.4 Implications for the soundness
of the Core Strategy 7.4.1 We have reviewed the ‘Landscape Character Assessment and Development Option
Evaluation Study’ of the district. It is not clear how this Landscape Study has been used to inform the spatial
strategy as it is not specifically referred to in the Core Strategy, nor is the Landscape Study listed as a background
paper at paragraph 1.7 of the Core Strategy (although it is included as a background paper on the Councils
website). 7.4.2 We have reviewed the methodology set out in the document and we have also reviewed whether
the methodology has been consistently applied resulting in a final report that is robust, thorough, and transparent
and that it would form a credible evidence base suitable to inform the spatial strategy contained in the Core
Strategy. The Study also includes a methodology employed to undertake a comparative evaluation of a potential
development area within a character area which has capacity to accommodate development. 7.4.3 The examples
referred to in our analysis above illustrate the inconsistency of the landscape assessment record sheets and

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arbitrary nature of the judgements made and it does not give any confidence to the manner in which the Landscape Study has been undertaken or to the transparent way that the judgements have been reached. 7.4.4 We contend that the Landscape Study is flawed and therefore the assessment of housing sites in the district, the spatial strategy and the Councils Sustainability Appraisal is unsound. In addition, in relation to the comparison assessment of sites within the district surrounding the towns and villages; we contend that this comparative assessment of character areas is flawed as the starting point for the assessment the landscape sensitivity / capacity analysis is unsound for the reason given above. 7.4.5 The Core Strategy proposes that the land to the west of Uckfield be identified as a ‘strategic development area’ suitable for accommodating 1,000 homes and some 12,650 sq metres net of employment floor space and education provision as an extension to the urban area to the west of New Town. In the light of the comments made on the Landscape Study, it is considered that this proposal be reassessed and, (taking into account the other representations made on other parts and policies contained in the Core Strategy), greater emphasis be given to the suitability of land at Maresfield to accommodate increased housing numbers and a larger proportion of the housing requirements for the district. 7.4.6 Policy WCS13 relating to Green Infrastructure is supported although it is considered that the anomalies and errors in the Landscape Study be addressed before this document is used to inform and guide the implementation of Green Infrastructure Strategy and also formulation of the specific measures for the protection and enhancement of the landscape which are to set out in the Delivery and Site Allocations DPD referred to at paragraph 7.28 of the Core Strategy.

Details of Changes to be Made:
SUMMARY 7.4.7 In conclusion, we contend that the Core Strategy is unsound because: 1. It is not justified as it is not based on a sound evidence base as the Landscape Study (Landscape Character Assessment and Development Options Evaluation Study of the District) is flawed and therefore the assessment of housing sites in the district, the spatial strategy and the Councils Sustainability Appraisal is unsound. It is not clear how the Landscape Study has been used to inform the spatial strategy as it is not specifically referred to in the Core Strategy nor is the Landscape Study listed as a background paper at paragraph 1.7 of the Core Strategy; 2. It is not justified because the Landscape Study as it is not robust, thorough, and transparent and that it does not form a credible evidence base suitable to inform the spatial strategy contained in the Core Strategy. The Landscape Study contains a number inconsistencies set out in the landscape assessment record sheets and contains a number of arbitrary judgements and so it does not give any confidence to the manner in which the Landscape Study has been undertaken or to the transparent way that the judgements have been reached 3. It is not consistent with national policy as the methodology for undertaking the Landscape Study (which has been used to inform the spatial strategy) refers to ‘AONB and AONB Buffer Zones’ as a way of identifying higher value landscapes. There are a number of reasons why this approach is unsound but there is no Government policy support for the concept of ‘AONB buffers’ in Planning Policy Statement No.7 or any other policy guidance.
Representation ID
1603
Person ID  Pelham Homes  
107745  
AgCntent ID  Mrs  Owen  
102625  Jennifer Owen & Associates Ltd.
WCS4 Strategic Development Areas  Policy 4
Sound  ☑ Yes  ☐ No  ☐ Justified  ☐ Effective  ☐ Consistent with national policy
Legally Compliant  ☐ Yes  ☐ No
Details of Reasons for Soundess/ Legal Complaince:
"Supplementary documents have been submitted but not attached, and may be viewed at the Council offices on request". In order to reflect the increased number of dwellings and the change of distribution required as set out at section 1.3.2. A total of 13,209 homes are proposed over the plan period 2006 - 2030 with 8,411 proposed for South Wealden and 4,798. This distribution takes into account the findings of the three reports on Landscape Transport and Waste water which are appended. 1.3.. In respect of Polegate the best placed area for development is that to the west of the town. Stone Cross is poorly placed in respect of landscape, sustainable transport and has few existing services and facilities within walking distance. Bramley Farm to the north of the bypass is actually favoured in the landscape assessment and could also be considered as an alternative employment location). the following amendment is required.

Details of Changes to be Made:
REVISION OUGHT SD5. Land at Dittons Road to be replaced with SD5: land to the north of the existing bypass at Poelgate. SD6: Land East and South East of Stone Cross to be replaced with land to the west of the A22 and north of the bypass at Polegate. SD6: Land adjoining Friday Street Farm at Stone Cross.

Representation ID
1584
Person ID  Ognjanovic  
522137  
Agent ID  Polegate Town Council  
WCS4 Strategic Development Areas  Policy 4
Sound  ☐ Yes  ☑ No  ☐ Justified  ☐ Effective  ☐ Consistent with national policy
Legally Compliant  ☑ Yes  ☐ No
Details of Reasons for Soundess/ Legal Complaince:
6.23 states 'the A2270 running through the urban area is still heavily congested and traffic flows on the strategic road network are very high'. Numerous references are made throughout the strategy to the need for infrastructure, and 5.16 states 'development at SD4 will be phased to commence from 2019 to enable integration of development in relation to transport infrastructure requirements and interventions in South Wealden'.

Details of Changes to be Made:
PTC has serious concerns over the impact of any additional vehicles on the heavily congested road network, and feel that the proposed transport strategy in unsound because of the numbers of extra vehicles any development would bring onto the A2270.
As an Association representing our residents, we don't want to build on green field sites unless absolutely necessary and the infrastructure and the flood planes must be taken into consideration. Since the Polegate bypass has been built, the traffic has quickly got back to being as bad as it was before through our Parish of Willingdon. The upgrading of the A27 to a dual carriageway should be a top priority to ease the congestion at the traffic lights on the A2270 and the A27 but whether this will ever be done in our lifetime remains to be seen. Mornings Mill site is a delicate site because it has a lot of flood plane and we wish to retain Hindsland Playing fields for both Willingdon and Polegate residents to use. It also acts as a good strategic gap between Polegate and Willingdon. The fields behind Hamlands which do flood could be dug out to form a lake to alleviate any flooding problem in Willingdon on the A2270 and also act as a good amenity linking with the Eastbourne Park and the cuckoo Trail and could be an excellent nature reserve. Any houses that might be built would need to be kept to a minimum and built near the railway line with the dirt from the lake acting as a bung which trees could be planted on to protect the view from the Downs. Also the residents could walk to the Railway Station, walk to Polegate to shop and this would help regenerate Polegate. Any access should go over the Railway Line on a flyover and link up with Dittons Road and then on to Jubilee Way via a roundabout where Morgan Est had their yard when they built the bypass. This would alleviate traffic problems on the A2270 which is almost to capacity now, before any extra houses are built. The land that adjoins the A2270 could be used for recreational and amenity use and still allow Willingdon to retain its rural/village appearance. By Mornings Mill Farm entrance there could possibly be a Community Centre/Cottage Hospital to serve the immediate area for minor injuries and outpatients like Uckfield Hospital. We would prefer not to have any extra housing and development in the area and when drawing up a plan you should consider the quality of life of the residents already here and the damage any over development will cause without the appropriate infrastructure in place. There are already many areas that flood and the sewerage and drainage would need considerable improvement as would the health service at a time when it is being suggested departments at our present hospital could well be closed in the not too distant future.

Details of Changes to be Made:

Yes
Sound
No
Justified
Effective
Consistent with national policy

Legally Compliant
Yes
No
I am a regular driver through Benhall Mill Road and play golf at the Nevill Golf Club. I would like to comment on the proposals as follows: 1. The proposed area of potential development currently offers a semi rural and rural dimension to the edge of town. The impact of 220 dwellings would change the entire functionality of Benhall Mill Road. The road cannot support this level of development on highways grounds alone. The area would be wholly supported by the infrastructure already in place through KKC and that provision would not be provided in any way by WDC as the road and finances just don't allow for this. 2. Although the site may not be prominent in its current natural state, it most certainly would with high density development, additional traffic and demand on public transport (which is currently being reviewed as part of the cost cutting for KCC). 3 The Trust who owns the site Ref: 126/1610 was awarded an extensive Government Grant for tree plantation some years ago. The land now benefits from extensive woodland, which in principle Wealden should be looking under policy, to retain. The primary purpose of this was to enhance the natural habitat. To remove these trees now that they are ecologically and environmentally beneficial would be illogical. There are some fine examples of large Oak trees, which presumably have TPOs on them. 4. Any vehicles currently leave Acer Avenue currently look onto an extremely pleasing green vista. The proposed density of housing, with road frontage would change the environment from pasture to high density, which is extreme. 5. Many of the large trees on the boundary of the land and running along the length of the railway are old which will impact natural renewal and noise effect to any potential houses built near the railway both at the time of development and in the future. 6. The proposal of 220 dwellings equates to approximately 600 - 800 new residents to Benhall Mill Road. This additional volume is significant would undoubtedly have an ecological effect on the AONB: noise, litter, insufficient road infrastructure to support pavements and people walking their dogs, dog foul, lack of social infrastructure (access to libraries, supermarkets, administration offices, town centres, community centres etc) and an increase in crime. 7. The ground, be definition on site 126/1610 will continue to produce gases for years to come. This may pose a health risk to people living on the old tip and surrounding ground area where contamination may be an issue. 8. Benhall Mill Road is a very narrow road which would require widening to support that number of additional cars, buses, industrial vehicles and lorries. Even if the road was widened the access could only be into and from Forest Road, which is maintained and paid for by Kent County Council. The access onto Forest Road with a new resident number of approximately 600 people would cause significant delays and danger to pedestrians. The road south is narrow, for single vehicles only. Golfers use the road to walk, with their golf bags, between the two greens. There is insufficient road or verge width to expand or extend as there is a rail bridge dividing the road. Additional traffic would undoubtedly be a safety issue. 9. The additional volume of vehicles would be unacceptable for the road and again would affect the AONB. In addition to the environment factors many of the houses at the entrance to Benhall Mill Road, from Forest Road, do not have off road parking. As a result there is a high volume parking in the current built up part of that road, together with overflow parking from the new developments on the Crematorium side of the road. This more densely populated area means that due to the high number of parked vehicles only one car can pass. The road is not wide enough for two vehicles to pass at the same time; this would cause significant additional pressure with potentially 300 - 400 additional cars using the road. 10. Access of vehicles in and out of the proposed land would have a significant impact to the dwellings in Tunbridge Wells at the top of the Benhall Mill Road and the access into and out of the Cemetery and Crematorium. 11. The noise and light which is evident from the Hawkenbury Astro Turf when in use would go some way to demonstrate the impact a development of 220 dwellings (possible 800 people) would have on noise and light. 12. The density of dwellings proposed will not be in keeping with the large dwelling and proportional land at Birch lands, Little Mount Farm, Windmill Farm and Windmill Farmhouse. 13. The land immediately adjacent to Little Mount Farm is owned by the J Edmonton Trust. We believe there may be a restriction to develop in any way capacity on the new tree plantation which overlooks Little Mount Farm and edges the railway boundary foliage and trees. The proposed plan does not appear to account for this. 14. This site is urban fringe to Tunbridge Wells and Kent County Council. The residents will naturally look for environmental and social support from within KKC and not Wealden which would suggest this proposal is made by WDC with the sole purpose of offloading the support of dwellings and residents to KCC. This is a ridiculous idea. WDC have many rural villages and town which will face the same impact issues in relation to schooling, medical provision, transport etc. but, if they invest properly improvements in these provisions will be of benefit to neighbouring villages and towns in the future when WDC face similar developmental pressures. 15. Kent County Council requested inclusion of Social Housing in Ash Close, the development between the Nevill Golf Club and Acer Avenue. This
development has been built to allow localised internal recreation areas for children and high brick walls, in line with
the enclosed Acer Avenue development. There is no mention of any Social Housing allocation. More allocation of
Social Housing together with the issues potential health risks with the land being built on and the railway will
undoubtedly have a negative effect on house prices and the lack of medical provision, local shops and public
transport will mean the demand for these properties will be poor. The residents in Ash Close find the lack of public
transport and local shops very difficult. These properties are not in high demand even within KCC. 16. If the
address of these dwellings was Tunbridge Wells; are WDC presuming that social provision within Tunbridge Wells
will support this new development and its residents? 17. Developments of 220 dwellings (approx 600 - 800 people)
should be allocated for sites within Wealden where WDC are able to provide the social support required by this
size of residential community. 18. There is no provision of schooling within Wealden for miles. The nearest
Wealden funded primary school is Frant. The site has developmental restraints and if already year in year out 
subscribed. The nearest secondary school is Uplands in Wadhurst. There is no public transport from Benhall Mill
Road to Wadhurst. The children in Ash Close, who are Kent County Council, are largely allocated Broadwater
Down School. There is no transport to that school and many families walk that distance with their children. How
would new residents be expected to travel to schools within Wealden? 19. The nearest Doctor's surgery will be in
Frant. Has Wealden DC allocated fees for an extension of these medical services offered? The address for these
properties will presumably be Tunbridge Wells and therefore WDC are presumably hoping they will not have to
provide medical support to these residents. 20. The nearest hospital to the residents would be Pembury, already
hugely busy with residents from Kent. If you applied for residential within Uckfield where there is considerable
land between the town and the industrial area and which supports a local hospital provision. Crow Junior Colts Rackets
champion - borough also has just such a provision. 21. The provision of sewage, mains, water, gas, electricity etc.
There are no mains supplies from Wealden so again WDC would presumably be looking for the developers to tap
into Kent supplies. There have been significant delays recently on Forest Road as a result of traffic lights being
erected whilst essential repair and replacement work has been done.

Details of Changes to be Made:

<table>
<thead>
<tr>
<th>Representation ID</th>
<th>Person ID</th>
<th>Agent ID</th>
</tr>
</thead>
<tbody>
<tr>
<td>1775</td>
<td>Mr. Blake</td>
<td>522225</td>
</tr>
</tbody>
</table>

WCS4 Strategic Development Areas

Sound  No  Justified  Effective  Consistent with national policy
Legally Compliant  Yes  No

Details of Reasons for Soundess/ Legal Complaince:

6. Conclusion 6.1 The Core Strategy states in para. 6.18 that it aims ‘to help ensure that the aspirations of the
Hellingly Parish Council / Hailsham Town Council Masterplan and the local community can be realised’. However,
it has rejected a key component of that Masterplan which reflects local opinion. 6.2 The District Council fears that
development to the east of Hailsham ‘could adversely affect the health objective due to the significant odour issues
from waste water treatment works that would be likely to affect new residents on a prolonged basis’. However, no
development is scheduled to commence before 2017 which allows a lengthy period for investigations to be made
into improvement of the existing waste water treatment works or into an alternative locations. It is not yet a reason
for proposing or accepting a second best solution. Annual Monitoring Reports will identify the need to review any
elements of the Core Strategy where monitoring has identified a sustained failure to meet the targets set and this
is just one of a whole range of viability and other issues which remain to be investigated. 6.3 The North Hailsham
residential allocation is not consistent with government policy in that it will not provide for social inclusion and a
sustainable community; would not enhance the physical environment by diverting the A271 traffic through an
existing residential community; would not promote accessibility to jobs, shopping, leisure facilities and services by
public transport, walking and cycling; and would not reduce the need to travel, especially by car.

Details of Changes to be Made:

6.4 It is submitted, therefore, that the Core Strategy is not sound in its present form because its proposal to site
700 additional dwellings to the north of the A271 rather than to the east of Hailsham is neither justified nor
consistent with government policy. It is requested that this proposal be deleted and that, if necessary, the housing
allocation to the east of Battle Road be increased from 600 to 1,300 dwellings.
6. Conclusion 6.1 The Core Strategy states in para. 6.18 that it aims ‘to help ensure that the aspirations of the Hellingly Parish Council / Hailsham Town Council Masterplan and the local community can be realised’. However, it has rejected a key component of that Masterplan which reflects local opinion. 6.2 The District Council fears that development to the east of Hailsham ‘could adversely affect the health objective due to the significant odour issues from waste water treatment works that would be likely to affect new residents on a prolonged basis’. However, no development is scheduled to commence before 2017 which allows a lengthy period for investigations to be made into improvement of the existing waste water treatment works or into an alternative locations. It is not yet a reason for proposing or accepting a second best solution. Annual Monitoring Reports will identify the need to review any elements of the Core Strategy where monitoring has identified a sustained failure to meet the targets set and this is just one of a whole range of viability and other issues which remain to be investigated. 6.3 The North Hailsham residential allocation is not consistent with government policy in that it will not provide for social inclusion and a sustainable community; would not enhance the physical environment by diverting the A271 traffic through an existing residential community; would not promote accessibility to jobs, shopping, leisure facilities and services by public transport, walking and cycling; and would not reduce the need to travel, especially by car.

Details of Changes to be Made:
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Details of Reasons for Soundess/ Legal Complaince:

6. Conclusion 6.1 The Core Strategy states in para. 6.18 that it aims ‘to help ensure that the aspirations of the Hellingly Parish Council / Hailsham Town Council Masterplan and the local community can be realised’. However, it has rejected a key component of that Masterplan which reflects local opinion. 6.2 The District Council fears that development to the east of Hailsham ‘could adversely affect the health objective due to the significant odour issues from waste water treatment works that would be likely to affect new residents on a prolonged basis’. However, no development is scheduled to commence before 2017 which allows a lengthy period for investigations to be made into improvement of the existing waste water treatment works or into an alternative locations. It is not yet a reason for proposing or accepting a second best solution. Annual Monitoring Reports will identify the need to review any elements of the Core Strategy where monitoring has identified a sustained failure to meet the targets set and this is just one of a whole range of viability and other issues which remain to be investigated. 6.3 The North Hailsham residential allocation is not consistent with government policy in that it will not provide for social inclusion and a sustainable community; would not enhance the physical environment by diverting the A271 traffic through an existing residential community; would not promote accessibility to jobs, shopping, leisure facilities and services by public transport, walking and cycling; and would not reduce the need to travel, especially by car.

Details of Changes to be Made:

6.4 It is submitted, therefore, that the Core Strategy is not sound in its present form because its proposal to site 700 additional dwellings to the north of the A271 rather than to the east of Hailsham is neither justified nor consistent with government policy. It is requested that this proposal be deleted and that, if necessary, the housing allocation to the east of Battle Road be increased from 600 to 1,300 dwellings.

Details of Reasons for Soundess/ Legal Complaince:

The housing trajectory is unhelpful in guiding future housing development. The Council's expectations on the level of housing completions in the period up to 2016 need to be revised down with a corresponding increase in the level of expected completions in the latter part of the Plan period. In the light of this uncertainty it is suggested figure 4 should be removed from the Core Strategy.

Details of Changes to be Made:

Delete figure 4 housing trajectory
Paragraph 5.13 states that over the last 21 years on average 400 dwellings have been built per annum across the district, and the Council hopes that this level of delivery can be sustained throughout the plan period. It is considered that there must be significant doubt as to whether this level of delivery is reasonable and achievable. The Council’s Annual Monitoring Report 2009/2010 identifies the annual net increase in dwellings in the district in recent years as follows: 2004/2005 - 128 2005/2006 - 173 2006/2006 - 230 2007/2008 - 415 2008/2009 - 349 2009/2010 - 337 The average number of new dwellings delivered over this 6 year period is 272, which is a very long way short of the 400 average that the Council is hoping for. Further more the first four years of this period cover a time of relative boom in the housing development market, yet the average net increase in dwellings was only 236. While there may be reasons why higher numbers of houses were delivered in the past, there is no indication in the above evidence that this is likely to be repeated to enable the identified annual average yield to be achieved.

Details of Changes to be Made:
To ensure that sufficient provision is made for housing to be delivered throughout the Core Strategy timescale, the Council needs to increase its overall level of housing numbers and, importantly, to increase the level of provision in the northern part of the District. It is considered that there should be increased provision for both Crowborough and Heathfield which is set out in more detail in the following sections. Higher provision at these locations can be accommodated in accordance with Policy SP03. Furthermore this approach will strengthen the ability of the Council to meet the objectives in Policy SP04. As drafted, the Core Strategy will fail to protect or secure investment to enhance local community provision in these towns. Higher levels of housing will provide the opportunity to secure greater levels of investment (including that from developer contributions) particularly where larger sites are allocated and developed in a more comprehensive way.
Details of Reasons for Soundness/ Legal Compliance:

1. Paragraph 5.13 states that over the last 21 years on average 400 dwellings have been built per annum across the district, and the Council hopes that this level of delivery can be sustained throughout the plan period. It is considered that there must be significant doubt as to whether this level of delivery is reasonable and achievable.

2. The Council’s Annual Monitoring Report 2009/2010 identifies the annual net increase in dwellings in the district in recent years as follows: 2004/2005 - 128 2005/2006 - 173 2006/2007 - 230 2007/2008 - 415 2008/2009 - 349 2009/2010 - 337 The average number of new dwellings delivered over this 6 year period is 272, which is a very long way short of the 400 average that the Council is hoping for/ furthermore, the first four years of this period cover a time of relative boom in the housing development market, yet the average net increase in dwellings average only 236.

3. While there may be reasons why the higher numbers of houses were delivered in the past, there is no indication in the above evidence that this is likely to be repeated to enable the identified annual average yield to be achieved.

4. To ensure that sufficient provision is made for housing to be delivered throughout the Core Strategy timescale, the Council needs to increase it overall level of housing numbers and, importantly, to increase the level of provision in the northern part of the District. It is considered that there should be increased provision for both Heathfield and Crowborough. Higher provision at these locations can be accommodated in accordance with Policy SP03. furthermore this approach will strengthen the ability of the Council to meet the objectives in Policy SP04. As drafted, the Core Strategy will fail to protect or secure investment to enhance local and community provision in these towns. Higher levels of housing will provide the opportunity to secure greater levels of investment (including that from developer contributions) particularly where larger sites are allocated and developed in a more comprehensive way.

Details of Changes to be Made:
Significantly more housing should be allocated in the north part of the District in order to create the opportunity meet the known housing needs within the plan period.
## Details of Reasons for Soundess/ Legal Complaince:

3. We agree with the underlying objectives for the housing trajectory to ensure that there is a continuous supply of new housing over the plan period that takes account of market conditions, the ability for communities to assimilate new development and the provision of the necessary infrastructure. However whilst Policy WCS5 does include flexibility in itself, and this is implicit in the housing trajectory (figure 4) which is referred to in Policy WCS5, the status of figure 5 is unclear and the wording in paragraph 5.16 reduces the flexibility. For example, it is suggested that development at south Polegate and east Willingdon (SD4) will be phased to commence from 2019 to enable integration of development in relation to transport infrastructure requirements and interventions in south Wealden. Transport analysis undertaken on behalf of our client suggests there may well be scope for some development before this date. We do not consider there is any advantage in artificially delaying the commencement of development if there is no good reason to do so. This approach would be consistent with paragraph 7.4 where it is stated that development should make the most effective use of existing infrastructure. It is possible to phase housing development to take advantage of existing infrastructure and ensure a satisfactory supply of housing is achieved and development should not be hindered by more strategic infrastructure concerns. One of the advantages of the area identified for growth in Polegate is that it will integrate more naturally into the existing built form, rather than satellite locations with intervening movement constraints such as main roads etc, will help to minimise the use of cars and therefore will create less need for highway infrastructure improvements. 4. The infrastructure constraints of the various Strategic Development Areas in the Core Strategy will become clearer through the Strategic Site Allocations DPD and we consider that more detailed phasing guidance should await this document and not be included in the Core Strategy. In addition the introduction of the Community Infrastructure Levy by 2014 may give better opportunities to fund transport (and other) infrastructure than has been the case in the past. In addition, Policy WCS7 (Effective Provision of Infrastructure) ensures that the release of land for development is conditional upon there being sufficient capacity in the existing local infrastructure to meet the requirements generated by the proposed development.

## Details of Changes to be Made:

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</table>
Figure 4

Details of Reasons for Soundess/ Legal Complaince:

1 Paragraph 5.13 states that over the last 21 years on average 400 dwellings have been built per annum across the district, and the Council hopes that this level of delivery can be sustained throughout the plan period. It is considered that there must be significant doubt as to whether this level of delivery is reasonable and achievable. 2 The Council’s Annual Monitoring Report 2009/2010 identifies the annual net increase in dwellings in the district in recent years as follows: Year Additional Dwellings 2004/2005 128 2005/2006 173 2006/2007 230 2007/2008 415 2008/2009 349 2009/2010 337 The average number of new dwellings delivered over this 6 year period is 272, which is a very long way short of the 400 average that the Council is hoping for. Furthermore, the first four years of this period cover a time of relative boom in the housing development market, yet the average net increase in dwellings average only 236. 3 While there may be reasons why higher numbers of houses were delivered in the past, there is no indication in the above evidence that this is likely to be repeated to enable the identified annual average yield to be achieved. 4 To ensure that sufficient provision is made for housing to be delivered throughout the Core Strategy timescale, the Council needs to increase its overall level of housing numbers and, importantly, to increase the level of provision in the northern part of the District. It is considered that there should be increased provision for both Heathfield and Crowborough. Higher provision at these locations can be accommodated in accordance with Policy SP03. Furthermore this approach will strengthen the ability of the Council to meet the objectives in Policy SP04. As drafted, the Core Strategy will fail to protect or secure investment to enhance local and community provision in these towns. Higher levels of housing will provide the opportunity to secure greater levels of investment (including that from developer contributions) particularly where larger sites are allocated and developed in a more comprehensive way.

Details of Changes to be Made:

Significantly more housing should be allocated in the north part of the District in order to create the opportunity to meet the known housing needs within the plan period.
Details of Reasons for Soundess/ Legal Complaince:

1. Paragraph 5.13 states that over the last 21 years on average 400 dwellings have been built per annum across the district and the Council hopes that this lever of delivery can be sustained throughout the plan period. It is considered that there must be significant doubt as to whether this level of delivery is reasonable and achievable. 2. The Council's Annual Monitoring Report 2009/2010 identifies the annual net increase in dwellings in the district in recent years as follows: 2004/2005 128 2005/2006 173 2006/2007 230 2007/2008 415 2008/2009 349 2009/2010 337. The average number of new dwellings delivered over this 6 year period is 272, which is a very long way short of the 400 average that the Council is hoping for. Furthermore, the first four years of this period cover a time of relative boom in the housing development market, yet the average net increase in dwellings average only 236. 3. While there may be reasons why higher numbers of houses were delivered in the past, there is no indication in the above evidence that this is likely to be repeated to enable the identified annual average yield to be achieved. 4. To ensure that sufficient provision is made for housing to be delivered throughout the Core Strategy timescale, the Council needs to increase its overall level of housing numbers and to importantly to increase the level of provision in the northern part of the district. It is considered that there should be increased provision for both Heathfield and Crowborough which is set out in more detail in the following sections. High provision at these locations can be accommodated in accordance with Policy SP03. Further this approach will strengthen the ability of the Council to meet the objectives in Policy SP04. As drafted, the Core Strategy will fail to protect or secure investment to enhance local and community provision in these towns and particularly in Heathfield. Due to the size of additional appendices they have not been uploaded but are available to view at the Council's offices.

Details of Changes to be Made:

Higher levels of housing will provide the opportunity to secure greater levels of investment (including that from developer contributions) particularly where larger sites are allocated and developed in a more comprehensive way.
Details of Reasons for Soundness/ Legal Compliance:
(paragraphs 5.13 – 5.16 and figure 4.1 Paragraph 5.13 states that over the last 21 years on average 400 dwellings have been built per annum across the District and the Council hopes that this level of delivery can be sustained throughout the period. It is considered that there must be significant doubt as to whether this level of delivery is reasonable and achievable. 2 The Council’s Annual Monitoring Report 2009/2010 identifies the annual net increase in dwellings in the district in recent years as follows: Year Additional Dwellings 2004/2005 128 2005/2006 173 2006/2007 230 2007/2008 415 2008/2009 349 2009/2010 337 The average number of new dwelling delivered over this 6 year period is 272, which is a very long way short of the 400 average that the Council is hoping for. Furthermore, the first four years of this period cover a time of relative boom in the housing development market, yet the average net increase in dwellings average only 236.

Details of Changes to be Made:
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Details of Reasons for Soundness/ Legal Compliance:
With regard to figure 4.1, the application of a line across the Housing Trajectory at the 550 dwelling completion level (consistent with the South East Plan's District requirement) would reveal the inadequacy of the amount of housing development being planned for and the problems which will face the community in accessing homes and in providing an increased level of affordable housing.

Details of Changes to be Made:
The South East Plan's minum 550 dwellings completions per year should be reflected upon the Figure 4 Trajectory
Details of Reasons for Soundess/ Legal Complaince:
"Supplementary documents have been submitted but not attached, and may be viewed at the Council offices on request".

Details of Changes to be Made:
REVISION SOUGHT : the trajectory should be amended to reflect the housing delivery programme set out in revised paragraph 5.3. (REVISION SOUGHT Delete paragraph 5.13 and replace with "An average delivery rate of at least 550 dwellings per annum will be delivered with a split of 350 per annum in South Wealden adn 200 per annum in North Wealden").

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Details of Reasons for Soundess/ Legal Complaince:
It is inappropriate to place the phasing of SD6 & SD7 together in Table 5. Asexplained prevoisly this does not accurately assess the deliverary of these 2 distinct areas or the seperate land parcels within. Due to the proximity to Polegate and its services and the intended employment provision at SD5 Land north of Stone Cross SD7 should be phased ahead of SD6.

Details of Changes to be Made:
Alter Table 5 SD7 & SD6 should be seperated and phased on the basis above ie SD7 first and that should mean land south of Dittons Rd, Stones Cross in the 1st phase of SD7.

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Details of Reasons for Soundess/ Legal Complaince:
SD3 should become the 1st phase of development at Hailsham including land north of New Rd at Park farm( 2016/17 onwards). This will enable a comprehensive development together with the necessary highway improvement to be delivered. It will incorporate a master plan to improve connectivety and sustainability of the hospital development with provision of a country park with cycle and pedsetrian links into the town. It will include employment and all necessary social infrastructure that will improve the deliverary and sustainability of this part of the District whilst enhancing the significant bebfits to the local community.

Details of Changes to be Made:
Alter the figures and timetable in Fig 5 to bring forward SD3 into the 2016/17 phasing and increase the number from 700 to 1300 dwellings
Policy WSC4 identifies the Strategic Development Areas in the District that the Council considers to be critical to the delivery of the overall strategy. SD6 identifies land at East and South East of Stone Cross that includes land north of Rattle Road owned by my client. We support the approach adopted within Policy WCS4 and the importance attached to the identified Strategic Development Areas to deliver housing and employment opportunities and wider services and infrastructure to support the growth of the District. In particular we support the identification of SD6 - it being a logical location to accommodate strategic development given the status of Stone Cross as a Service Centre within the wider settlement hierarchy, its particularly good public transport connections to Langney and Estbourne, its existing level of services, employment opportunities and facilities and its close links with th A22/A27 primary and trunk routes. Indeed, the provision of housing and employment development in the area will, we believe, help to address the economic needs of the south of the District and the wider Sussex Coast Sub-region whilst also delivering affordable housing in meaningful numbers and making a positive contribution to the sustainability of Stone Cross and the quality of life for existing and future residents. The South East Plan proposes that approximately 63% of Wealden's new housing development is located in the Sussex Coast Sub-Region. The draft Core Strategy is in accordance with this as at present approximately 63% of new allocations (excluding rural areas) are within the Sussex Coast Policy Area. Overall therefore, this approach is consistent with policy within the South East Plan, including specific policy for the Sussex Coast Sub-Region and national planning policy (PPS3 paragraphs 36-38) by helping to create mixed and sustainable communities, developing housing and employment in suitable locations offering a range of community facilities with access to jobs and services. The approach also accords with the Government's housing objectives in PPS3 in particular the approach identified in Paragraphs 10 and 36 of delivering housing developments in suitable locations, which offer a good range of community facilities and with good access to jobs, key services and infrastructure. Further, it is apparent that all of the requirements set out in paragraph 38 of PPS3 for finding the most suitable locations for growth have been carefully applied to the housing and employment land targets, resulting, at least in the south Wealden District area, in a comprehensive, credible and deliverable spatial plan to address the needs of the District. The Council's SHLAA identified a number of development sites around Stone Cross that are suitable for development and unconstrained by ownership. In addition, development in this location is known to be viable based on the findings of the Strategic Housing Market Assessment. Having regard to all of the above points and when considered against the alternative of less or no development, this approach is considered to be sound. Less or no development at Stone Cross would be at odds with the established national and regional planning policy identified above. It would also fail to reflect the established settlement pattern in the District, would place greater development pressures on other locations in the District and would inevitably fail to achieve the aims of sustaining and enhancing local services, providing homes in parallel with jobs, providing affordable housing and combining growth with recreation and leisure development. Overall therefore, the approach to development within this area is largely justified in line with the requirements of PPS12 as it is founded on a robust and credible evidence base and is the most appropriate strategy when considered against the reasonable alternatives. However, in the context of our comments concerning the overall scale of housing required in the District under Policy WCS1, we consider that the housing provision identified for Stone Cross under supporting text (Figure 5 and at paragraph 6.31) to Policy WCS1 (650 dwellings) should be increased to reflect existing local housing need and the anticipated growth in households during the Core Strategy period.

Details of Changes to be Made:

Yes  No  Justified  Effective  Consistent with national policy

Sound: Yes  No

Legally Compliant: Yes  No
Summary of all Representations - Proposed Submission Core Strategy Regulation 27 - Report 11th July 2011

Representation ID
1144
Person ID 533827
Agent ID 533824
Agent ID Mark Stephen Limited
Agent ID PHD Chartered Town Planners
Agent ID Mr Hughes
Agent ID Mr Hughes
Agent ID PHD Chartered Town Planners
Agent ID PHD Chartered Town Planners

Phasing of Development Figure 5

Details of Reasons for Soundess/ Legal Complaince:

consequential amendments subject to acceptance of other changes reduce or remove Stone Cross urban extensions as it is inconsistent with national countryside policy which seeks to prevent coalescence of settlements and is not justified having regard to the classification of the settlement which should be as a Local or neighbourhood centre.

Details of Changes to be Made:
Amend Stone Cross urban extension and include South Hailsham urban extension with delivery commencing 2015/16 as there would be no constraints to early delivery from the site

Sound ☐ Yes ☑ No ☑ Justified ☐ Effective ☑ Consistent with national policy
Legally Compliant ☑ Yes ☐ No

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Representation ID
1413
Person ID 334590
Agent ID 334578
Agent ID University of Brighton
Agent ID King Sturge Llp
Agent ID Ager
Agent ID Ager

Phasing of Development Figure 5

Details of Reasons for Soundess/ Legal Complaince:

3. We agree with the underlying objectives for the housing trajectory to ensure that there is a continuous supply of new housing over the plan period that takes account of market conditions, the ability for communities to assimilate new development and the provision of the necessary infrastructure. However whilst Policy WCS5 does include flexibility in itself, and this is implicit in the housing trajectory (figure 4) which is referred to in Policy WCS5, the status of figure 5 is unclear and the wording in paragraph 5.16 reduces the flexibility. For example, it is suggested that development at south Polegate and east Willingdon (SD4) will be phased to commence from 2019 to enable integration of development in relation to transport infrastructure requirements and interventions in south Wealden. Transport analysis undertaken on behalf of our client suggests there may well be scope for some development before this date. We do not consider there is any advantage in artificially delaying the commencement of development if there is no good reason to do so. This approach would be consistent with paragraph 7.4 where it is stated that development should make the most effective use of existing infrastructure. It is possible to phase housing development to take advantage of existing infrastructure and ensure a satisfactory supply of housing is achieved and development should not be hindered by more strategic infrastructure concerns. One of the advantages of the area identified for growth in Polegate is that it will integrate more naturally into the existing built form, rather than satellite locations with intervening movement constraints such as main roads etc, will help to minimise the use of cars and therefore will create less need for highway infrastructure improvements. 4. The infrastructure constraints of the various Strategic Development Areas in the Core Strategy will become clearer through the Strategic Site Allocations DPD and we consider that more detailed phasing guidance should await this document and not be included in the Core Strategy. In addition the introduction of the Community Infrastructure Levy by 2014 may give better opportunities to fund transport (and other) infrastructure than has been the case in the past. In addition, Policy WCS7 (Effective Provision of Infrastructure) ensures that the release of land for development is conditional upon there being sufficient capacity in the existing local infrastructure to meet the requirements generated by the proposed development.

Details of Changes to be Made:
Representation ID
1369

Person ID  Mr  Richardson
220620  Gleeson Developments Ltd

Agent ID

Phasing of Development Figure 5

Sound  Yes  No  Justified  Effective  Consistent with national policy
Legally Compliant  Yes  No

Details of Reasons for Soundess/ Legal Complaince:

We support the Councils identification of an urban extension to the east of Hailsham to be commenced around 2017 as set out within SD2. The land is very logical and capable of supporting growth and can deliver the growth that the Council anticipates. We would however suggest, as with our earlier comments on policies WCS 1 and WCS 2 that additional growth should be planned for and with this in mind the land east of Hailsham has the ability to accommodate higher levels of growth than that presently planned for by the Council.

Details of Changes to be Made:

Yes  Sound  No  Justified  Effective  Consistent with national policy
Legally Compliant  Yes  No

Representation ID
300

Person ID  Ms  Smith
521490  WE Vine Trust

Agent ID  Mr  Gillespie
521485  Impact Planning Services Ltd

Phasing of Development Figure 5

Sound  Yes  No  Justified  Effective  Consistent with national policy
Legally Compliant  Yes  No

Details of Reasons for Soundess/ Legal Complaince:

The Figure 5 Phasing of Development schedule does not include sufficient sites to meet the level of housing development considered appropriate for the District within the South East Plan. The South East Plan is the most relevant and up-to-date authoritative document against which to establish an effective housing delivery strategy. The schedule will need to be enlarged. The schedule also reveals the need for additional smaller scale sites to come forward within the period 2011 - 2019. These should come forward without compromising infrastructure requirements. The currently proposed land supply releases are heavily constrained and will require co ordination of infrastructure funding, possibly through advanced provision which reinforces the need for a Community Infrastructure Levy mechanism to be put into place. Objection is made to the extent of the area of land identified as SD3. This location is further away from the town centre than other identified (SHLAA) suitable options and should be reduced in scale. Objection is made to the inclusion of SD2 in the absence of the results of studies relating to potential odour issues and infrastructure constraints. Objection is made to the omission of land to the south of Hailsham which was identified as a suitable site within the SHLAA (ref: 245/1310) but rejected for superficial reasons. When compared to the location to the north of Hailsham this land is closer to the town centre with alternative means of transport available via the Cuckoo Trail which lies immediately adjacent to the site. Other land to the south of Hailsham (SHLAA ref: 207/1310) should be reconsidered in the light of the more immediate connectivity with the Town Centre via the Cuckoo Trail and potential for a well planned comprehensively planned release. See supporting report.

Details of Changes to be Made:

The schedule will require revision and recasting to accommodate additional sites.
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<th>Agent Name</th>
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<td>102625</td>
<td>Mrs Owen</td>
<td>102625</td>
<td>Jennifer Owen &amp; Associates Ltd.</td>
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<tr>
<td>1654</td>
<td>516047</td>
<td>516026</td>
<td>Mr. Hough</td>
<td>516026</td>
<td>Sigma Planning Services</td>
</tr>
</tbody>
</table>

**Sound**
- Yes
- No
- Justified
- Effective
- Consistent with national policy

**Legally Compliant**
- Yes
- No

**Details of Reasons for Soundess/ Legal Complaince:**

The church considers that development at Crowborough should commence as soon as possible to deliver services and housing to those in need provided that the development constraint can be satisfactorily overcome.

**Details of Changes to be Made:**

The phasing of growth at Crowborough should be linked to the overcoming of constraints rather than a time period.

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"Supplementary documents have been submitted but not attached, and may be viewed at the Council offices on request". Paragraph 5.19 This paragraph refers to contigency arrangements which are not specified

**Details of Changes to be Made:**

REVISION SOUGHT Delete paragraph.

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**Details of Reasons for Soundess/ Legal Complaince:**

There is no justification in the evidence base for the proposed phasing of development at Crowborough. The proposed phasing produces the anomaly of no housebuilding between 2019 and 2024. There is no reasoned justification to support this and it can only be to the detriment of the vitality and viability of this important town.

**Details of Changes to be Made:**

Provide for more housing at Crowborough in order to allow an even flow of housing delivery. Remove phasing proposals unless reasoned justification can be provided.
Phasing of Development Figure 5

**Sound**  Yes  No  Justified  Effective  Consistent with national policy

**Legally Compliant**  Yes  No

**Details of Reasons for Soundness/ Legal Complaince:**
Rydon supports the approach to 'phasing of development' in Figure 5 for Stone Cross urban extensions (SD6-7) provided there is recognition within the Council of the lead-in times associated with the preparation/submission/approval of planning applications and other stages prior to the delivery of first completions in accordance with the phasing.

**Details of Changes to be Made:**
A statement within the Core Strategy recognising the need for the submission of planning applications sufficiently far enough in advance to deliver new housing in accordance with Figure 5 phasing of Development would be welcomed.

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**Representation ID**
688

**Person ID**  Mr  Beams  Agent ID
519685  Willingdon and Jevington Parish Council

**Paragraph**  5.13

**Sound**  No  Yes  No  Justified  Effective  Consistent with national policy

**Legally Compliant**  Yes  No

**Details of Reasons for Soundness/ Legal Complaince:**
WJPC is concerned at the numerous references to Polegate and Willingdon as one settlement, as highlighted in 3.3 Table 1, 3.11, SPO6, WCS2, WCS3, 5.13, 6.31(2), Figure 8 and Figure 12. In particular, Figure 2 showing settlement hierarchy, places Polegate and Willingdon as one settlement, yet details other settlements individually.

**Details of Changes to be Made:**
Details of Reasons for Soundness/ Legal Complaince:
1. Paragraph 5.13 states that over the last 21 years on average 400 dwellings have been built per annum across the district, and the Council hopes that this level of delivery can be sustained throughout the plan period. It is considered that there must be significant doubt as to whether this level of delivery is reasonable and achievable. 2. The Council’s Annual Monitoring Report 2009/2010 identifies the annual net increase in dwellings in the district in recent years as follows: 2004/2005 - 128 2005/2006 - 173 2006/2007 - 230 2007/2008 - 415 2008/2009 - 349 2009/2010 - 337 The average number of new dwellings delivered over this 6 year period is 272, which is a very long way short of the 400 average that the Council is hoping for/ furthermore, the first four years of this period cover a time of relative boom in the housing development market, yet the average net increase in dwellings average only 236. 3. While there may be reasons why the higher numbers of houses were delivered in the past, there is no indication in the above evidence that this is likely to be repeated to enable the identified annual average yield to be achieved. 4. To ensure that sufficient provision is made for housing to be delivered throughout the Core Strategy timescale, the Council needs to increase it overall level of housing numbers and, importantly, to increase the level of provision in the northern part of the Disstrict. It is considered that there should be increased provision for both Heathfield and Crowborough. Higher provision at these locations can be accommodated in accordance with Policy SP03. further more this approach will strengthen the ability of the Council to meet the objectives in Policy SP04. As drafted, the Core Strategy will fail to protect or secure investment to enhance local and community provision in these towns. Higher levels of housing will provide the opportunity to secure greater levels of investment (including that from developer contributions) particularly where larger sites are allocated and developed in a more comprehensive way.

Details of Changes to be Made:
Significantly more housing should be allocated in the north part of the District in order to create the opportunity meet the known housing needs within the plan period.
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Summary of all Representations - Proposed Submission Core Strategy Regulation 27 - Report 11th July 2011

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<td>Person ID</td>
<td>332748 Mr Nightingale</td>
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<td>102571 Mr Nightingale</td>
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<td>Paragraph</td>
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<tr>
<td>Person ID</td>
<td>107745 Pelham Homes</td>
</tr>
<tr>
<td>Agent ID</td>
<td>102625 Mrs Owen Jennifer Owen &amp; Associates Ltd.</td>
</tr>
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<td>Paragraph</td>
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<td>&quot;Supplementary documents have been submitted but not attached, and may be viewed at the Council offices on request&quot;. Paragraph 5.13. This paragraph is misleading as the build rate in Wealden has been constrained by planning policies. The Housing Trajectory shows what can be achieved in the predictions for 2011 to 2015 and the SHLAA demonstrates that there are enough sites for any barriers to be overcome.</td>
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Concern raised at the reference to Polegate and Willingdon as one settlement

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3. We agree with the underlying objectives for the housing trajectory to ensure that there is a continuous supply of new housing over the plan period that takes account of market conditions, the ability for communities to assimilate new development and the provision of the necessary infrastructure. However whilst Policy WCS5 does include flexibility in itself, and this is implicit in the housing trajectory (figure 4) which is referred to in Policy WCS5, the status of figure 5 is unclear and the wording in paragraph 5.16 reduces the flexibility. For example, it is suggested that development at south Polegate and east Willingdon (SD4) will be phased to commence from 2019 to enable integration of development in relation to transport infrastructure requirements and interventions in south Wealden. Transport analysis undertaken on behalf of our client suggests there may well be scope for some development before this date. We do not consider there is any advantage in artificially delaying the commencement of development if there is no good reason to do so. This approach would be consistent with paragraph 7.4 where it is stated that development should make the most effective use of existing infrastructure. It is possible to phase housing development to take advantage of existing infrastructure and ensure a satisfactory supply of housing is achieved and development should not be hindered by more strategic infrastructure concerns. One of the advantages of the area identified for growth in Polegate is that it will integrate more naturally into the existing built form, rather than satellite locations with intervening movement constraints such as main roads etc, will help to minimise the use of cars and therefore will create less need for highway infrastructure improvements. 4. The infrastructure constraints of the various Strategic Development Areas in the Core Strategy will become clearer through the Strategic Site Allocations DPD and we consider that more detailed phasing guidance should await this document and not be included in the Core Strategy. In addition the introduction of the Community Infrastructure Levy by 2014 may give better opportunities to fund transport (and other) infrastructure than has been the case in the past. In addition, Policy WCS7 (Effective Provision of Infrastructure) ensures that the release of land for development is conditional upon there being sufficient capacity in the existing local infrastructure to meet the requirements generated by the proposed development.

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2. The Council's Annual Monitoring Report 2009/2010 identifies the annual net increase in dwellings in the district in recent years as follows: 2004/2005 128, 2005/2006 173, 2006/2007 230, 2007/2008 415, 2008/2009 349, 2009/2010 337. The average number of new dwellings delivered over this 6 year period is 272, which is a very long way short of the 400 average that the Council is hoping for. Furthermore, the first four years of this period cover a time of relative boom in the housing development market, yet the average net increase in dwellings was only 236.

3. While there may be reasons why higher numbers of houses were delivered in the past, there is no indication in the above evidence that this is likely to be repeated to enable the identified annual average yield to be achieved.

4. To ensure that sufficient provision is made for housing to be delivered throughout the Core Strategy timescale, the Council needs to increase its overall level of housing numbers and to importantly increase the level of provision in the northern part of the district. It is considered that there should be increased provision for both Heathfield and Crowborough which is set out in more detail in the following sections. High provision at these locations can be accommodated in accordance with Policy SP03. Further this approach will strengthen the ability of the Council to meet the objectives in Policy SP04. As drafted, the Core Strategy will fail to protect or secure investment to enhance local and community provision in these towns and particularly in Heathfield. Due to the size of additional appendices they have not been uploaded but are available to view at the Council's offices.

Details of Changes to be Made:

Higher levels of housing will provide the opportunity to secure greater levels of investment (including that from developer contributions) particularly where larger sites are allocated and developed in a more comprehensive way.
Details of Reasons for Soundess/ Legal Complaince:
(paragraphs 5.13 – 5.16 and figure 4 1 Paragraph 5.13 states that over the last 21 years on average 400 dwellings have been built per annum across the District and the Council hopes that this level of delivery can be sustained throughout the period. It is considered that there must be significant doubt as to whether this level of delivery is reasonable and achievable. 2 The Council’s Annual Monitoring Report 2009/2010 identifies the annual net increase in dwellings in the district in recent years as follows: Year Additional Dwellings 2004/2005 128 2005/2006 173 2006/2007 230 2007/2008 415 2008/2009 349 2009/2010 337 The average number of new dwelling delivered over this 6 year period is 272, which is a very long way short of the 400 average that the Council is hoping for. Furthermore, the first four years of this period cover a time of relative boom in the housing development market, yet the average net increase in dwellings average only 236.

Details of Changes to be Made:
3 While there may be reasons why higher numbers of houses were delivered in the past, there is no indication in the above evidence that this is likely to be repeated to enable the identified annual average yield to be achieved. 4 To ensure that sufficient provision is made for housing to be delivered throughout the Core Strategy timescale, the Council need to increase its overall level of housing numbers and importantly to increase the level of provision in the northern part of the District. It is considered that there should be increased provision for both Heathfield and Crowborough, which is set out in more details in the following sections. Higher provision at these locations can be accommodated in accordance with Policy SP03. Furthermore this approach will strengthen the ability of the Council to meet the objectives in Policy SP094. As drafted, the Core Strategy will fail to protect or secure investment to enhance local and community provision in these towns and particularly in Heathfield. Higher levels of housing will provide the opportunity to secure greater levels of investment (including that from developer contributions) particularly where larger sites are allocated and developed in a more comprehensive way.

Details of Reasons for Soundess/ Legal Complaince:
5.16 states ‘development at south Polegate and east Willingdon will be phased to commence from 2019 to enable integration of development in relation to transport infrastructure requirements and interventions in South Wealden.’

Details of Changes to be Made:
If these infrastructure requirements are not completed by 2019 how will this impact on any development within Polegate.
Details of Reasons for Soundess/ Legal Complaince:
"Supplementary documents have been submitted but not attached, and may be viewed at the Council offices on request".

Details of Changes to be Made:
REVISION SOUGHT Figure 5 should be amended to reflect the increased housing delivery numbers set out in revised Policy WCS2. Bullet point 2 should be amended to add land west of the A22 at Polegate. Bullet Point 8 should be amended to 800 dwellings principally in South Wealden.

Details of Reasons for Soundess/ Legal Complaince:
The evidence base does not demonstrate why development south east of Crowborough has to be delayed until after 2024. Evidence provided to WDC demonstrates how traffic conditions in Western Road can be addressed at an early stage. The plan strategy is therefoe based upon a false premise.

Details of Changes to be Made:
Remove any reference to constraints on developing SDA SD10 being unable to be addressed until 2024.

Details of Reasons for Soundess/ Legal Complaince:
2. Paragraph 5.9 confirms that housing figures set out in Policy WCS2 make no provision for windfall sites, but completions on windfall sites will count towards the overall house building totals achieved in Wealden. However, it should be clarified that these will be additional to the housing figures referred to in Policy WCS2. In this regard the wording of paragraph 5.17 is unclear and seems to potentially contradict Policy WCS2. In view of the higher housing allocation in the South East Plan, there is no justification for windfall sites to be counted against the total 9,600 housing figure.

Details of Changes to be Made:
Paragraph 5.18

Details of Reasons for Soundess/ Legal Complaince:
I cannot see the evidence submitted to suggest that the Councils have undertaken sufficient research they suggest in assessing the housing trajectory stated in their CS.

Details of Changes to be Made:
Greater clarity and evidence is required to prove the soundness of this statement.
Legally Compliant

Sound: No, Justified, Effective, Consistent with national policy

Details of Reasons for Soundess/ Legal Complaince:

We are intrigued by the Council’s intended adoption of an unsound housing position. The Council’s proposals for the provision of housing development during the period 2006 – 2030 demonstrate that the Council’s Local Development Framework Document is not in conformity with the Regional Spatial Strategy, which forms part of the Development Plan. Paragraph 3.3 of the Council’s Background Paper no.1 (BP1) states “Current legislation requires that the Core Strategy is in general conformity with the Regional Spatial Strategy, the South East Plan” (SEP), which was adopted in May 2009. In paragraph 3.3 of BP1, the Council also acknowledge that “The South East Plan requires that at least 11,000 dwellings is provided in Wealden District between 2006 and 2026”. The SEP (Policy H1) requires 11,000 new dwellings to be provided in Wealden District between 2006 and 2026, equal to an overall annual requirement of 550 per year. Paragraph 3.3 of the Council’s BP1 states “Because of existing planning permissions and houses that have already been built since 2006, overall we need to find locations for a total of approximately 7,000 new houses between now and 2026”. Assuming 550 dwellings per year based on the SEP housing requirement, extending the PSCS DPD end date to 2030 (i.e. 4 more years) would require an additional 2,200 dwellings, bringing this total to the equivalent of 9,200 dwellings between 2006 and 2030. Policy WCS2 indicates that 4,889 dwellings are already committed (through planning permissions, commencements etc.) as at 1st April 2010. Set against the SEP requirement, this would leave a residual requirement for 6,111 dwellings up to 2026 (i.e. 11,000 minus 4,889) and if the SEP requirement were to be extended by 4 years up to 2030 (at 550 dwellings per year i.e. a total of 2,200 dwellings), this would create a total residual requirement of 8,311 additional dwellings by 2030. This residual requirement is the equivalent of 415 dwellings per annum during the remaining 20 year period between April 2010 and April 2030. By contrast, draft Policy WCS1 provides for a total provision of 9,600 dwellings between 2006 and 2030. Taking account of 4,889 dwelling commitments, this leaves only 4,711 new dwellings during the remaining 20 year period. This is the equivalent of only 230 dwellings per year (i.e. just over half that implied by extending the annual housing requirement set out in Policy H1 of the SEP to 2030). In draft Policy WCS2, the 9,600 dwelling figure referred to in draft Policy WCS1 has a total of 9,574 dwellings during the same 2006 – 2030 time period. The Council has not provided any justification for failing to comply with the housing requirements set out in SEP and no justification has been provided as to how the seemingly speculative figure of 9,600 dwellings or 9,574 dwellings has been arrived at for the housing requirement during the period 2006 – 2030 in draft Policies WSC1 and WSC2. As the council are aware there have been a number of recent announcements regarding the emerging Localism Bill and the changes being sought by the Government and we have looked to deal with these within our comments. As the Council is aware, Section 19 of the Planning and Compulsory Purchase Act 2004 (as amended) deals with the Preparation of local development documents. Section 19(2) specifically states that: “In preparing a Development Plan Document or any other local development document the local planning authority must have regard to (a) national policies and advice contained in guidance issued by the Secretary of State; (b) the RSS for the region in which the area of the authority is situated, if the area is outside Greater London”; (h) any other local development document which has been adopted by the authority”. The adopted South East Plan therefore remains part of the development plan and whatever the Council believes cannot be used as a reason for not complying with 19(2)(b) as this is a statutory requirement. This is particularly true bearing in mind recent appeal decisions, which confirm the status of the RSS’s and the limited weight that can be attributed at this time to the emerging Localism Bill. Accordingly any DPD that appears prior to enactment of the Localism Bill which materially departs from the RSS must be found unsound given that it would not comply with statute, particularly given the Governments recent announcement that an Environmental Assessment will now be carried out to consider the removal of the RSS’s. By any reasonable standard, this is likely to take a long period of time and it is therefore fair to assume the RSS’s will remain as part of the development plan for a good period to come. Nonetheless, even ignoring the above the Government remains committed to the delivery of more housing and it therefore seems perverse for the council to be attempting to adopt a strategy which seeks to reduce what should be recognised at the very least, as a minimum housing requirement. It is clear from all the above therefore that the RSS remains in law as part of the development plan and cannot be ignored, as the council appears to be seeking to do. We also refer the council back to the founding principles of the emerging local development framework. For example PPS 12 confirms that the Core Strategies; “4.36 Core strategies must be justifiable: they must be: • founded on a robust and credible evidence base; and • the most appropriate strategy when considered against the reasonable alternatives”. We question whether the council’s unjustified Housing Growth figures meet this simple test as presently emerging and we maintain therefore that the Councils emerging Core Strategy is not only deficient because it ignores the
adopted RSS, but it also not founded on the most up to date evidence base. Perhaps, however most importantly we draw the council's attention to the evidence base it has at its disposal and indeed comments it makes in supporting documents for this Core Strategy. Paragraph 5.3 of the “Managing the Delivery of Housing Background Paper” – Background Paper 2 notes that “the Council's Housing Needs Assessment highlights the acute level of affordable housing need within the District and it is noted that the main means of achieving affordable housing delivery is by the means of the construction of market housing...” Paragraph 6.11 of the same document goes onto confirm that “on this basis, the assessment has identified an annual affordable housing need of 812 in Wealden”. On the basis that the delivery of affordable housing, as accepted by the Council is predicated on the delivery of market accommodation, the evidence supports a much higher level of growth than that envisaged by paragraphs 3.8 – 3.17 and more importantly policies WCS1 and WCS2 of the consultation document. Indeed, it is obvious from the above that a target of 4,685 new homes over the period 2006 – 2026 is neither robust or indeed accurate and would continue to exacerbate the ongoing chronic housing deficiencies in the district. Furthermore, paragraph 3.22 of BP1 is of course, wholly misleading as it compares housing target figures that relate to two different time periods. The 11,000 dwellings target relates to the housing requirement set out in SEP between the period 2006 and 2026 (i.e. equal to 550 dwellings per annum), whereas the Council’s reduced figure of 9,600 dwellings relates to an extended 4 year period between 2006 – 2030 which would be the equivalent of 400 dwellings per annum (i.e. a reduction of 150 dwellings per annum over the entire Plan period compared to the SEP). Thus, not only is the PSCS DPD not legally compliant in failing to be in accordance with the Development Plan (or its time period), but also it is not sound, as no satisfactory justification has been provided for the substantial reduction in the housing period and over an extended plan period. Moreover, no justification has been made as to why the council fails to take on board the evidence which clearly supports a higher housing provision than that proposed within the adopted RSS, particularly taking on board the Governments growth agenda.

Details of Changes to be Made:

We therefore suggest that the submitted Core strategy needs to be amended to take into the account the extant development plan, including the South East Plan’s housing target at the very least, but with a recognition for a higher level of growth should be planned for. At the very least therefore, there needs to be a larger degree of flexibility built into the document. Whilst the Council has within paragraphs 5.18 – 5.20, as well as policy WCS5 sought to provide a contingency within the document, this does not go far enough and needs to be far more robust to take account, as indentified above of the chronic affordable housing issues that exist within the District.
We are intrigued by the Council’s intended adoption of an unsound housing position. The Council’s proposals for the provision of housing development during the period 2006 – 2030 demonstrate that the Council’s Local Development Framework Document is not in conformity with the Regional Spatial Strategy, which forms part of the Development Plan. Paragraph 3.3 of the Council’s Background Paper no. 1 (BP1) states “Current legislation requires that the Core Strategy is in general conformity with the Regional Spatial Strategy, the South East Plan” (SEP), which was adopted in May 2009. In paragraph 3.3 of BP1, the Council also acknowledge that “The South East Plan requires that at least 11,000 dwellings is provided in Wealden District between 2006 and 2026”. The SEP (Policy H1) requires 11,000 new dwellings to be provided in Wealden District between 2006 and 2026, equal to an overall annual requirement of 550 per year. Paragraph 3.3 of the Council’s BP1 states “Because of existing planning permissions and houses that have already been built since 2006, overall we need to find locations for a total of approximately 7,000 new houses between now and 2026”. Assuming 550 dwellings per year based on the SEP housing requirement, extending the PSCS DPD end date to 2030 (i.e. 4 more years) would require an additional 2,200 dwellings, bringing this total to the equivalent of 9,200 dwellings between 2006 and 2030. Policy WCS2 indicates that 4,889 dwellings are already committed (through planning permissions, commencements etc.) as at 1st April 2010. Set against the SEP requirement, this would leave a residual requirement for 6,111 dwellings up to 2026 (i.e. 11,000 minus 4,889) and if the SEP requirement were to be extended by 4 years up to 2030 (at 550 dwellings per year i.e. a total of 2,200 dwellings), this would create a total residual requirement of 8,311 additional dwellings by 2030. This residual requirement is the equivalent of 415 dwellings per annum during the remaining 20 year period between April 2010 and April 2030. By contrast, draft Policy WCS1 provides for a total provision of 9,600 dwellings between 2006 and 2030. Taking account of 4,889 dwelling commitments, this leaves only 4,685 new dwellings during the remaining 20 year period. This is the equivalent of only 230 dwellings per year (i.e. just over half that implied by extending the annual housing requirement set out in Policy H1 of the SEP to 2030). In draft Policy WCS2, the 9,600 dwelling figure referred to in draft Policy WCS1 has a total of 9,574 dwellings during the same 2006 – 2030 time period. The Council has not provided any justification for failing to comply with the housing requirements set out in SEP and no justification has been provided as to how the seemingly speculative figure of 9,600 dwellings or 9,574 dwellings has been arrived at for the housing requirement during the period 2006 – 2030 in draft Policies WSC1 and WSC2. As the council are aware there have been a number of recent announcements regarding the emerging Localism Bill and the changes being sought by the Government and we have looked to deal with these within our comments. As the Council is aware, Section 19 of the Planning and Compulsory Purchase Act 2004 (as amended) deals with the Preparation of local development documents. Section 19(2) specifically states that: “In preparing a Development Plan Document or any other local development document the local planning authority must have regard to (a) national policies and advice contained in guidance issued by the Secretary of State; (b) the RSS for the region in which the area of the authority is situated, if the area is outside Greater London”; (h) any other local development document which has been adopted by the authority”. The adopted South East Plan therefore remains part of the development plan and whatever the Council believes cannot be used as a reason for not complying with 19(2)(b) as this is a statutory requirement. This is particularly true bearing in mind recent appeal decisions, which confirm the status of the RSS’s and the limited weight that can be attributed at this time to the emerging Localism Bill. Accordingly any DPD that appears prior to enactment of the Localism Bill which materially departs from the RSS must be found unsound given that it would not comply with statute, particularly given the Governments recent announcement that an Environmental Assessment will now be carried out to consider the removal of the RSS’s. By any reasonable standard, this is likely to take a long period of time and it is therefore fair to assume the RSS’s will remain as part of the development plan for a good period to come. Nonetheless, even ignoring the above the Government remains committed to the delivery of more housing and it therefore seems perverse for the council to be attempting to adopt a strategy which seeks to reduce what should be recognised at the very least, as a minimum housing requirement. It is clear from all the above therefore that the RSS remains in law as part of the development plan and cannot be ignored, as the council appears to be seeking to do. 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Paragraph 3.3 of the Council’s BP1 states “Because of existing planning permissions and houses that have already been built since 2006, over all we need to find locations for a total of approximately 7,000 new houses between now and 2026”. Assuming 550 dwellings per year based on the SEP housing requirement, extending the PSCS DPD end date to 2030 (i.e. 4 more years) would require an additional 2,200 dwellings, bringing this total to the equivalent of 9,200 dwellings between 2006 and 2030. Policy WCS2 indicates that 4,889 dwellings are already committed (through planning permissions, commencements etc.) as at 1st April 2010. Set against the SEP requirement, this would leave a residual requirement for 6,111 dwellings up to 2026 (i.e. 11,000 minus 4,889) and if the SEP requirement were to be extended by 4 years up to 2030 (at 550 dwellings per year i.e. a total of 2,200 dwellings), this would create a total residual requirement of 8,311 additional dwellings by 2030. 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Accordingly any DPD that appears prior to enactment of the Localism Bill which materially departs from the RSS must be found unsound given that it would not comply with statute, particularly given the Governments recent announcement that an Environmental Assessment will now be carried out to consider the removal of the RSS’s. By any reasonable standard, this is likely to take a long period of time and it is therefore fair to assume the RSS’s will remain as part of the development plan for a good period to come. Nonetheless, even ignoring the above the Government remains committed to the delivery of more housing and it therefore seems perverse for the council to be attempting to adopt a strategy which seeks to reduce what should be recognised at the very least, as a minimum housing requirement. It is clear from all the above therefore that the RSS remains in law as part of the development plan and cannot be ignored, as the council appears to be seeking to do. 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We therefore suggest that the submitted Core strategy needs to be amended to take into the account the extant development plan, including the South East Plan’s housing target at the very least, but with a recognition for a higher level of growth should be planned for. At the very least therefore, there needs to be a larger degree of flexibility built into the document. Whilst the Council has within paragraphs 5.18 – 5.20, as well as policy WCS5 sought to provide a contingency within the document, this does not go far enough and needs to be far more robust to take account, as indentified above of the chronic affordable housing issues that exist within the District.
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Paragraph 3.3 of the Council’s BP1 states “Because of existing planning permissions and houses that have already been built since 2006, overall we need to find locations for a total of approximately 7,000 new houses between now and 2026”. Assuming 550 dwellings per year based on the SEP housing requirement, extending the PSCS DPD end date to 2030 (i.e. 4 more years) would require an additional 2,200 dwellings, bringing this total to the equivalent of 9,200 dwellings between 2006 and 2030. Policy WCS2 indicates that 4,889 dwellings are already committed (through planning permissions, commencements etc.) as at 1st April 2010. Set against the SEP requirement, this would leave a residual requirement for 6,111 dwellings up to 2026 (i.e. 11,000 minus 4,889) and if the SEP requirement were to be extended by 4 years up to 2030 (at 550 dwellings per year i.e. a total of 2,200 dwellings), this would create a total residual requirement of 8,311 additional dwellings by 2030. This residual requirement is the equivalent of 415 dwellings per annum during the remaining 20 year period between April 2010 and April 2030. By contrast, draft Policy WCS1 provides for a total provision of 9,600 dwellings between 2006 and 2030. Taking account of 4,889 dwelling commitments, this leaves only 4,685 new dwellings during the remaining 20 year period. This is the equivalent of only 230 dwellings per year (i.e. just over half that implied by extending the annual housing requirement set out in Policy H1 of the SEP to 2030). In draft Policy WCS2, the 9,600 dwelling figure referred to in draft Policy WCS1 has a total of 9,574 dwellings during the same 2006 – 2030 time period. 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Section 19(2) specifically states that: “In preparing a Development Plan Document or any other local development document the local planning authority must have regard to (a) national policies and advice contained in guidance issued by the Secretary of State; (b) the RSS for the region in which the area of the authority is situated, if the area is outside Greater London”; (h) any other local development document which has been adopted by the authority”. The adopted South East Plan therefore remains part of the development plan and whatever the Council believes cannot be used as a reason for not complying with 19(2)(b) as this is a statutory requirement. This is particularly true bearing in mind recent appeal decisions, which confirm the status of the RSS’s and the limited weight that can be attributed at this time to the emerging Localism Bill. Accordingly any DPD that appears prior to enactment of the Localism Bill which materially departs from the RSS must be found unsound given that it would not comply with statute, particularly given the Governments recent announcement that an Environmental Assessment will now be carried out to consider the removal of the RSS’s. By any reasonable standard, this is likely to take a long period of time and it is therefore fair to assume the RSS’s will remain as part of the development plan for a good period to come. Nonetheless, even ignoring the above the Government remains committed to the delivery of more housing and it therefore seems perverse for the council to be attempting to adopt a strategy which seeks to reduce what should be recognised at the very least, as a minimum housing requirement. It is clear from all the above therefore that the RSS remains in law as part of the development plan and cannot be ignored, as the council appears to be seeking to do. We also refer the council back to the founding principles of the emerging local development framework. For example PPS 12 confirms that the Core Strategies; “4.36 Core strategies must be justifiable: they must be: • founded on a robust and credible evidence base; and • the most appropriate strategy when considered against the reasonable alternatives”. We question whether the council’s unjustified Housing Growth figures meet this simple test as presently emerging and we maintain therefore that the Councils emerging Core Strategy is not only deficient because it ignores the
adopted RSS, but it also not founded on the most up to date evidence base. Perhaps, however most importantly we draw the council's attention to the evidence base it has at its disposal and indeed comments it makes in supporting documents for this Core Strategy. Paragraph 5.3 of the “Managing the Delivery of Housing Background Paper” – Background Paper 2 notes that “the Councils Housing Needs Assessment highlights the acute level of affordable housing need within the District and it is noted that the main means of achieving affordable housing delivery is by the means of the construction of market housing...” Paragraph 6.11 of the same document goes onto confirm that “on this basis, the assessment has identified an annual affordable housing need of 812 in Wealden”. On the basis that the delivery of affordable housing, as accepted by the Council is predicated on the delivery of market accommodation, the evidence supports a much higher level of growth than that envisaged by paragraphs 3.8 – 3.17 and more importantly policies WCS1 and WCS2 of the consultation document. Indeed, it is obvious from the above that a target of 4,685 new homes over the period 2006 – 2026 is neither robust or indeed accurate and would continue to exacerbate the ongoing chronic housing deficiencies in the district. Furthermore, paragraph 3.22 of BP1 is of course, wholly misleading as it compares housing target figures that relate to two different time periods. The 11,000 dwellings target relates to the housing requirement set out in SEP between the period 2006 and 2026 (i.e. equal to 550 dwellings per annum), whereas the Council’s reduced figure of 9,600 dwellings relates to an extended 4 year period between 2006 – 2030 which would be the equivalent of 400 dwellings per annum (i.e. a reduction of 150 dwellings per annum over the entire Plan period compared to the SEP). Thus, not only is the PSCS DPD not legally compliant in failing to be in accordance with the Development Plan (or its time period), but also it is not sound, as no satisfactory justification has been provided for the substantial reduction in the housing period and over an extended plan period. Moreover, no justification has been made as to why the council fails to take on board the evidence which clearly supports a higher housing provision than that proposed within the adopted RSS, particularly taking on board the Governments growth agenda.

Details of Changes to be Made:
We therefore suggest that the submitted Core strategy needs to be amended to take into the account the extant development plan, including the South East Plan’s housing target at the very least, but with a recognition for a higher level of growth should be planned for. At the very least therefore, there needs to be a larger degree of flexibility built into the document. Whilst the Council has within paragraphs 5.18 – 5.20, as well as policy WCS5 sought to provide a contingency within the document, this does not go far enough and needs to be far more robust to take account, as indentified above of the chronic affordable housing issues that exist within the District.
We are intrigued by the Council's intended adoption of an unsound housing position. The Council's proposals for the provision of housing development during the period 2006 – 2030 demonstrate that the Council's Local Development Framework Document is not in conformity with the Regional Spatial Strategy, which forms part of the Development Plan. Paragraph 3.3 of the Council's Background Paper no. 1 (BP1) states “Current legislation requires that the Core Strategy is in general conformity with the Regional Spatial Strategy, the South East Plan” (SEP), which was adopted in May 2009. In paragraph 3.3 of BP1, the Council also acknowledge that "The South East Plan requires that at least 11,000 dwellings is provided in Wealden District between 2006 and 2026". The SEP (Policy H1) requires 11,000 new dwellings to be provided in Wealden District between 2006 and 2026, equal to an overall annual requirement of 550 per year. Paragraph 3.3 of the Council’s BP1 states “Because of existing planning permissions and houses that have already been built since 2006, overall we need to find locations for a total of approximately 7,000 new houses between now and 2026”. Assuming 550 dwellings per year based on the SEP housing requirement, extending the PSCS DPD end date to 2030 (i.e. 4 more years) would require an additional 2,200 dwellings, bringing this total to the equivalent of 9,200 dwellings between 2006 and 2030. Policy WCS2 indicates that 4,889 dwellings are already committed (through planning permissions, commencements etc.) as at 1st April 2010. Set against the SEP requirement, this would leave a residual requirement for 6,111 dwellings up to 2026 (i.e. 11,000 minus 4,889) and if the SEP requirement were to be extended by 4 years up to 2030 (at 550 dwellings per year i.e. a total of 2,200 dwellings), this would create a total residual requirement of 8,311 additional dwellings by 2030. This residual requirement is the equivalent of 415 dwellings per annum during the remaining 20 year period between April 2010 and April 2030. By contrast, draft Policy WCS1 provides for a total provision of 9,600 dwellings between 2006 and 2030. Taking account of 4,889 dwelling commitments, this leaves only 4,885 new dwellings during the remaining 20 year period. This is the equivalent of only 230 dwellings per year (i.e. just over half that implied by extending the annual housing requirement set out in Policy H1 of the SEP to 2030). In draft Policy WCS2, the 9,600 dwelling figure referred to in draft Policy WCS1 has a total of 9,574 dwellings during the same 2006 – 2030 time period. The Council has not provided any justification for failing to comply with the housing requirements set out in SEP and no justification has been provided as to how the seemingly speculative figure of 9,600 dwellings or 9,574 dwellings has been arrived at for the housing requirement during the period 2006 – 2030 in draft Policies WSC1 and WSC2. As the council are aware there have been a number of recent announcements regarding the emerging Localism Bill and the changes being sought by the Government and we have looked to deal with these within our comments. As the Council is aware, Section 19 of the Planning and Compulsory Purchase Act 2004 (as amended) deals with the Preparation of local development documents. Section 19(2) specifically states that: “In preparing a Development Plan Document or any other local development document the local planning authority must have regard to (a) national policies and advice contained in guidance issued by the Secretary of State; (b) the RSS for the region in which the area of the authority is situated, if the area is outside Greater London”; (h) any other local development document which has been adopted by the authority”. The adopted South East Plan therefore remains part of the development plan and whatever the Council believes cannot be used as a reason for not complying with 19(2)(b) as this is a statutory requirement. This is particularly true bearing in mind recent appeal decisions, which confirm the status of the RSS’s and the limited weight that can be attributed at this time to the emerging Localism Bill. Accordingly any DPD that appears prior to enactment of the Localism Bill which materially departs from the RSS must be found unsound given that it would not comply with statute, particularly given the Governments recent announcement that an Environmental Assessment will now be carried out to consider the removal of the RSS’s. By any reasonable standard, this is likely to take a long period of time and it is therefore fair to assume the RSS's will remain as part of the development plan for a good period to come. Nonetheless, even ignoring the above the Government remains committed to the delivery of more housing and it therefore seems perverse for the council to be attempting to adopt a strategy which seeks to reduce what should be recognised at the very least, as a minimum housing requirement. It is clear from all the above therefore that the RSS remains in law as part of the development plan and cannot be ignored, as the council appears to be seeking to do. 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adopted RSS, but it also not founded on the most up to date evidence base. Perhaps, however most importantly we draw the council’s attention to the evidence base it has at its disposal and indeed comments it makes in supporting documents for this Core Strategy. Paragraph 5.3 of the “Managing the Delivery of Housing Background Paper” – Background Paper 2 notes that “the Councils Housing Needs Assessment highlights the acute level of affordable housing need within the District and it is noted that the main means of achieving affordable housing delivery is by the means of the construction of market housing...” Paragraph 6.11 of the same document goes onto confirm that “on this basis, the assessment has identified an annual affordable housing need of 812 in Wealden”. On the basis that the delivery of affordable housing, as accepted by the Council is predicated on the delivery of market accommodation, the evidence supports a much higher level of growth than that envisaged by paragraphs 3.8 – 3.17 and more importantly policies WCS1 and WCS2 of the consultation document. Indeed, it is obvious from the above that a target of 4,685 new homes over the period 2006 – 2026 is neither robust or indeed accurate and would continue to exacerbate the ongoing chronic housing deficiencies in the district. Furthermore, paragraph 3.22 of BP1 is of course, wholly misleading as it compares housing target figures that relate to two different time periods. The 11,000 dwellings target relates to the housing requirement set out in SEP between the period 2006 and 2026 (i.e. equal to 550 dwellings per annum), whereas the Council’s reduced figure of 9,600 dwellings relates to an extended 4 year period between 2006 – 2030 which would be the equivalent of 400 dwellings per annum (i.e. a reduction of 150 dwellings per annum over the entire Plan period compared to the SEP). Thus, not only is the PSCS DPD not legally compliant in failing to be in accordance with the Development Plan (or its time period), but also it is not sound, as no satisfactory justification has been provided for the substantial reduction in the housing period and over an extended plan period. Moreover, no justification has been made as to why the council fails to take on board the evidence which clearly supports a higher housing provision than that proposed within the adopted RSS, particularly taking on board the Governments growth agenda.

Details of Changes to be Made:

We therefore suggest that the submitted Core strategy needs to be amended to take into the account the extant development plan, including the South East Plan’s housing target at the very least, but with a recognition for a higher level of growth should be planned for. At the very least therefore, there needs to be a larger degree of flexibility built into the document. Whilst the Council has within paragraphs 5.18 – 5.20, as well as policy WCS5 sought to provide a contingency within the document, this does not go far enough and needs to be far more robust to take account, as indentified above of the chronic affordable housing issues that exist within the District.
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Paragraph 3.3 of the Council’s BP1 states “Because of existing planning permissions and houses that have already been built since 2006, overall we need to find locations for a total of approximately 7,000 new houses between now and 2026”. Assuming 550 dwellings per year based on the SEP housing requirement, extending the PSCS DPD end date to 2030 (i.e. 4 more years) would require an additional 2,200 dwellings, bringing this total to the equivalent of 9,200 dwellings between 2006 and 2030. Policy WCS2 indicates that 4,889 dwellings are already committed (through planning permissions, commencements etc.) as at 1st April 2010. Set against the SEP requirement, this would leave a residual requirement for 6,111 dwellings up to 2026 (i.e. 11,000 minus 4,889) and if the SEP requirement were to be extended by 4 years up to 2030 (at 550 dwellings per year i.e. a total of 2,200 dwellings), this would create a total residual requirement of 8,311 additional dwellings by 2030. 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Section 19(2) specifically states that: “In preparing a Development Plan Document or any other local development document the local planning authority must have regard to (a) national policies and advice contained in guidance issued by the Secretary of State; (b) the RSS for the region in which the area of the authority is situated, if the area is outside Greater London”; (h) any other local development document which has been adopted by the authority”. The adopted South East Plan therefore remains part of the development plan and whatever the Council believes cannot be used as a reason for not complying with 19(2)(b) as this is a statutory requirement. This is particularly true bearing in mind recent appeal decisions, which confirm the status of the RSS’s and the limited weight that can be attributed at this time to the emerging Localism Bill. 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Details of Changes to be Made:
We therefore suggest that the submitted Core strategy needs to be amended to take into the account the extant development plan, including the South East Plan’s housing target at the very least, but with a recognition for a higher level of growth should be planned for. At the very least therefore, there needs to be a larger degree of flexibility built into the document. Whilst the Council has within paragraphs 5.18 – 5.20, as well as policy WCS5 sought to provide a contingency within the document, this does not go far enough and needs to be far more robust to take account, as identified above of the chronic affordable housing issues that exist within the District.

Details of Reasons for Soundess/ Legal Complaince:
The Infrastructure Delivery Plan (IDP) is insufficiently informed as it does not benefit from the results of the waste water treatment study, particularly in relation to potential development options to the south of Haisham. The IDP must therefore be reviewed in the light of the findings and the site release sequence adjusted to reflect the need to identify additional capacity for residential development in the short-to-medium term in particular. At present the two broad locations for residential land releases identified at Hailsham are overly dependent on major infrastructure improvements therefore additional sites with flexibility require identification. The IDS needs to reflect the results of further research into this issue with a more responsive ability to release shorter term sites.

Details of Changes to be Made:
The IDS needs to be reviewed in the light of the outstanding research into the waste water treatment works' additional capacity particularly in relation to potential development land south of Hailsham.
Representation ID
48

Person ID  Mr   Courtley  
513493
Agent ID  Mr   Courtley  
102476

WCS5 Managing the Policy 5  Release of Housing Land

Sound  ☑ Yes  ☑ No  ☑ Justified  ☑ Effective  ☑ Consistent with national policy
Legally Compliant  ☑ Yes  ☑ No

Details of Reasons for Soundness/Legal Complaince:
WSC5 Gives no evidence of the Councils Trajectory nor offers any contingency. The Councils have stated the 9600 is a minimum it therefore unnecessary to control housing deliverary were it exceeds this minimum figure.

Details of Changes to be Made:
Current reference to control of over provision of housing and question the trajectory assumptions. Evidence must be submitted to justify this policy.

Representation ID
90

Person ID  Ms   Van-Gils  
336229
Agent ID  Mr   Court  
519713
Peter Court Associates

WCS5 Managing the Policy 5  Release of Housing Land

Sound  ☑ Yes  ☑ No  ☑ Justified  ☑ Effective  ☑ Consistent with national policy
Legally Compliant  ☑ Yes  ☑ No

Details of Reasons for Soundness/Legal Complaince:
This policy is predicated upon the contents of policy WCS2. Objection has already been made to that on the grounds that it is unsound and inadequate. The purpose of policy WCS5 will therefore need to adopt a different approach, namely one of encouraging development, rather than that of seeking to restrict it. Indeed, if there is demand for housing, why should a local authority look to restrict it? Sustainable development is all about meeting today's needs, and so attempting to restrict it appears illogical. Given the amount of additional housing that is required, then the emphasis of this policy should be on bringing that land forward. The policy therefore needs to be re-worded so as to reflect this.

Details of Changes to be Made:
Eastbourne Borough Council acknowledges the inclusion of a policy dealing specifically with the release of housing land and welcomes the inclusion of the wording, “The release of land will be dependent on the timely provision of infrastructure necessary to deliver housing, including affordable housing”. The reference to the Infrastructure Delivery Plan is also strongly supported and the acknowledgement in paragraph 5.20 that, “If infrastructure is critical to delivery of any proposed growth and is not able to be delivered this will have an impact on the delivery of growth” is welcomed. Failure to provide sufficient mechanisms for the delivery of essential infrastructure to support housing development has the potential to cause serious and wide-ranging problems, both within Wealden, and in neighbouring local authorities. This issue is likely to be particularly acute in the areas of Wealden close to the District boundary with Eastbourne where a large proportion of the District’s overall growth is proposed and where significant deficiencies in essential infrastructure have already been identified. It is therefore essential that the impacts on transport, waste water treatment, educational facilities and health care facilities, and the environment are fully understood and the additional needs generated by the additional growth firmly embedded into the Core Strategy. The Policy needs to provide a clear indication of what would happen if, for whatever reason, infrastructure delivery was not forthcoming, and what implications this would have for the overall deliverability of the Core Strategy. The Strategy places considerable emphasis on the delivery of a relatively small number of large urban extensions to provide the bulk of its overall housing target. A delay caused by issues relating to the provision of infrastructure in just one or two of these large urban extensions, could have serious implications for the Core Strategy’s ability to achieve the housing targets established within it. The extension of the overall time-period within which the Core Strategy needs to deliver the housing, from 2026, to 2030, might help to achieve the targets but the Core Strategy is still heavily reliant on a small number of urban extensions and this is something that requires further consideration.

Details of Changes to be Made:

WSC5 gives no evidence of the Councils Trajectory nor offers any contingency. The Council has stated the 9600 is a mimimum it is therefore unnecessary to control housing deliverary were it exceeds this minimum figure.

Details of Changes to be Made:
Current ref to control of over provision of housing and questions of the trajectory assumptions need to be debated. Evidence must be submitted to justify this policy statement.
Details of Reasons for Soundess/ Legal Complaince:
The County Council supports the principle in this policy that the release of land is to be dependent upon the timely provision of infrastructure necessary to deliver housing. The County Council also supports the need for reviews of the Infrastructure Delivery Plan, as both needs and funding streams are subject to change, and this may lead to necessary adjustments in the pace of housing delivery. The County Council is happy to help keep the Infrastructure Delivery Plan up to date.

Details of Changes to be Made:

Details of Reasons for Soundess/ Legal Complaince:
The recognition of SHLAA sites being an appropriate source of housing provision should be carried through all housing delivery policies.

Details of Changes to be Made:

Details of Reasons for Soundess/ Legal Complaince:
The policy should refer to monitoring the average completion rate figure against the actual completion rate figure. The policy should then allow the Council to take action if the two figures are significantly different.

Details of Changes to be Made:

Policy WCS5. Managing the release of Housing Land The Council will monitor the completions annually and compare the figure with the average annual completions required to meet the housing requirement of policy SP03. If over a period of 2 - 3 years the completions are significantly higher than predicted the provision of additional planning consents for housing on large sites will be restricted. If completions are significantly lower than predicted. Then planning consents for large sites will be supported even if this means that development is in advance of the provision of related infrastructure.
3.2 Crowborough is identified by the Council as a "top tier" District Centre within Wealden District which in strategic and locational terms is relatively close to two of the Council's three highest order "Primary Centres" at Tunbridge Wells and Tonbridge to the north of the District. The Council suggests however, that the potential for future housing land release at Crowborough is limited, due mainly to landscape constraints. 3.3 No satisfactory evidence has been produced by the Council to show that Crowborough is any more constrained than development at other locations more favoured by the Council for strategic housing development, such as at Uckfield (within its historic flood risk problems and traffic congestion in its town centre) or within the Hailsham/Polegate/Stone Cross area (where there are wast water treatment constraints that could affect the high protected Pevensey Levels area within the southern part of the district). As it stands at present and for no sound reason, new housing provision would be heavily biased towards meeting housing requirements in the central and southern parts of the District rather than in the northern part, where demand is high as reflected by local house prices. 3.4 There is no sound evidence that the Crowborough area can only accommodate up to 300 new dwellings nor is any sound reason given for delaying such housing development until the middle and end part of the PSCS DPD period. In particular, this has major implications for the delivery of affordable housing, for which there is a recognised need in Crowborough. this would be limited to just 105 additional affordable dwellings between 2015 - 2030 (assuming 35% delivery within the strategic development areas identified by the Council) 3.5 he Council has provided no satisfactory explanation as to what is meant by a "Strategic Development Area" (either in relation to the settlement hierarchy or in terms of the size of potential housing sites or the number of houses). Furthermore, not only is the purposes of identifying such areas unclear, but also there are clear inconsistencies in the Council's overall identification of potential strategic development areas compared to other areas within the District (e.g. Horam) where a significant number of dwellings might be also delivered, but without SDA status. 3.6 The identification of 12 SDAs in draft Policy WCS4 also prejudices any proper or detailed examination and assessment of other potentially suitable housing land at Crowborough (and elsewhere) at the SS and DSA DPD stage. these representations have in particular, demonstrated that the Council's identification of SDAs at Crowb orough (the subject of SD8 - SD10) are not based on any creditable or sound evidence, nor do they necessarily represent the best locations or land available for future housing development (contrary to national planning policy contained in PPS12, paragraph 4.38). The Council's contingency site, which although shown in figure 9 and on the key Diagram of the PSCS DPD is not referred to in any draft Core Strategy policy. In addition it is allocated for another purpose within the Non-Statutory Local Plan and is wholly within the HWAONB. 3.7 The identification of SDAs in draft Policy WCS4 means that to be properly tested at the EIP, there would need to be a much wider consideration of all suitable candidate sites such as the land at Alderbrook, which is allocated for housing development in the Non-Statutory Local Plan (Policy CR4) and is within the Crowborough development boundary. This is immediately available to provide approximately 80 dwellings (24 affordable) and would not have to be delayed until either the middle or the end of the plan period unlike SD8, SD9 or SD10. 3.8 It must be highly questionable whether it would be appropriate to examine and compare the SDA sites with other candidate sites at the PSCS DPD EIP. It is also highly questionable as to whether the Council's proposed SS DPD would serve any purpose other than to merely identify site boundaries or provide 'development briefs' for the 12 DSAs listed in draft Policy WSC4. If so, it is questionable as to the purpose of the Council's proposed SS DPD as the site boundaries could be identified in the Council's proposed DSA DPD and development briefs could be provided in the form of Supplementary Planning Documents. 3.9 The Council's proposed Spatial Strategy Policy is a fundamental part of the PSCS DPD and if this is found to be fundamentally flawed for the cumulative reasons put forward in these representations, then the document would be intrinsically unsound. Rather than identifying suitable settlements and broad numbers for new housing delivery in each based upon the Council's proposed settlement hierarchy, the Council has largely ignored this and has instead identified SDAs at specific locations, thereby significantly restricting the scope of the Council's proposed SS DPD, which would appear to be limited to merely defining site boundaries, rather than providing robust policy based on a full and proper assessment of all suitable and available candidate sites. Eight Appendices have been submitted, but are not attached, and these are available to view at the Council Offices by request.

Details of Changes to be Made:
3.10 Indeed, the PSCS DPD is so defective that is difficult to see how it could be reasonably altered in view of the
fundamental nature of these representations and the only potential way forward in this situation would be for the Council to withdraw the document in order to either provide a detailed evidence base for each of its proposed SDAs or alternatively and more appropriately, for this to form part of a later SS DPD (if still relevant) or a DSA DPD, once the core strategy has been adopted. This would then provide a proper opportunity to assess in detail all the housing sites proposed by the Council together with other candidate sites having regard to the overall housing requirement and the hierarchy of settlements as set out in the Core Strategy DPD.
We are intrigued by the Council’s intended adoption of an unsound housing position. The Council’s proposals for the provision of housing development during the period 2006 – 2030 demonstrate that the Council’s Local Development Framework Document is not in conformity with the Regional Spatial Strategy, which forms part of the Development Plan. Paragraph 3.3 of the Council’s Background Paper no. 1 (BP1) states “Current legislation requires that the Core Strategy is in general conformity with the Regional Spatial Strategy, the South East Plan” (SEP), which was adopted in May 2009. In paragraph 3.3 of BP1, the Council also acknowledge that “The South East Plan requires that at least 11,000 dwellings is provided in Wealden District between 2006 and 2026”. The SEP (Policy H1) requires 11,000 new dwellings to be provided in Wealden District between 2006 and 2026, equal to an overall annual requirement of 550 per year. Paragraph 3.3 of the Council’s BP1 states “Because of existing planning permissions and houses that have already been built since 2006, overall we need to find locations for a total of approximately 7,000 new houses between now and 2026”. Assuming 550 dwellings per year based on the SEP housing requirement, extending the PSCS DPD end date to 2030 (i.e. 4 more years) would require an additional 2,200 dwellings, bringing this total to the equivalent of 9,200 dwellings between 2006 and 2030. Policy WCS2 indicates that 4,889 dwellings are already committed (through planning permissions, commencements etc.) as at 1st April 2010. Set against the SEP requirement, this would leave a residual requirement for 6,111 dwellings up to 2026 (i.e. 11,000 minus 4,889) and if the SEP requirement were to be extended by 4 years up to 2030 (at 550 dwellings per year i.e. a total of 2,200 dwellings), this would create a total residual requirement of 8,311 additional dwellings by 2030. This residual requirement is the equivalent of 415 dwellings per annum during the remaining 20 year period between April 2010 and April 2030. By contrast, draft Policy WCS1 provides for a total provision of 9,600 dwellings between 2006 and 2030. Taking account of 4,889 dwelling commitments, this leaves only 4,885 new dwellings during the remaining 20 year period. This is the equivalent of only 230 dwellings per year (i.e. just over half that implied by extending the annual housing requirement set out in Policy H1 of the SEP to 2030). In draft Policy WCS2, the 9,600 dwelling figure referred to in draft Policy WCS1 has a total of 9,574 dwellings during the same 2006 – 2030 time period. The Council has not provided any justification for failing to comply with the housing requirements set out in SEP and no justification has been provided as to how the seemingly speculative figure of 9,600 dwellings or 9,574 dwellings has been arrived at for the housing requirement during the period 2006 – 2030 in draft Policies WSC1 and WSC2. As the council are aware there have been a number of recent announcements regarding the emerging Localism Bill and the changes being sought by the Government and we have looked to deal with these within our comments. As the Council is aware, Section 19 of the Planning and Compulsory Purchase Act 2004 (as amended) deals with the Preperation of local development documents. Section 19(2) specifically states that: “In preparing a Development Plan Document or any other local development document the local planning authority must have regard to (a) national policies and advice contained in guidance issued by the Secretary of State; (b) the RSS for the region in which the area of the authority is situated, if the area is outside Greater London”; (h) any other local development document which has been adopted by the authority”. The adopted South East Plan therefore remains part of the development plan and whatever the Council believes cannot be used as a reason for not complying with 19(2)(b) as this is a statutory requirement. This is particularly true bearing in mind recent appeal decisions, which confirm the status of the RSS’s and the limited weight that can be attributed at this time to the emerging Localism Bill. Accordingly any DPD that appears prior to enactment of the Localism Bill which materially departs from the RSS must be found unsound given that it would not comply with statute, particularly given the Governments recent announcement that an Environmental Assessment will now be carried out to consider the removal of the RSS’s. By any reasonable standard, this is likely to take a long period of time and it is therefore fair to assume the RSS’s will remain as part of the development plan for a good period to come. Nonetheless, even ignoring the above the Government remains committed to the delivery of more housing and it therefore seems perverse for the council to be attempting to adopt a strategy which seeks to reduce what should be recognised at the very least, as a minimum housing requirement. It is clear from all the above therefore that the RSS remains in law as part of the development plan and cannot be ignored, as the council appears to be seeking to do. We also refer the council back to the founding principles of the emerging local development framework. For example PPS 12 confirms that the Core Strategies; “4.36 Core strategies must be justifiable: they must be: • founded on a robust and credible evidence base; and • the most appropriate strategy when considered against the reasonable alternatives”. We question whether the council’s unjustified Housing Growth figures meet this simple test as presently emerging and...
we maintain therefore that the Councils emerging Core Strategy is not only deficient because it ignores the adopted RSS, but it also not founded on the most up to date evidence base. Perhaps, however most importantly we draw the council’s attention to the evidence base it has at its disposal and indeed comments it makes in supporting documents for this Core Strategy. Paragraph 5.3 of the “Managing the Delivery of Housing Background Paper” – Background Paper 2 notes that “the Councils Housing Needs Assessment highlights the acute level of affordable housing need within the District and it is noted that the main means of achieving affordable housing delivery is by the means of the construction of market housing…” Paragraph 6.11 of the same document goes onto confirm that “on this basis, the assessment has identified an annual affordable housing need of 812 in Wealden”. On the basis that the delivery of affordable housing, as accepted by the Council is predicated on the delivery of market accommodation, the evidence supports a much higher level of growth than that envisaged by paragraphs 3.8 – 3.17 and more importantly policies WCS1 and WCS2 of the consultation document. Indeed, it is obvious from the above that a target of 4,685 new homes over the period 2006 – 2026 is neither robust or indeed accurate and would continue to exacerbate the ongoing chronic housing deficiencies in the district. Furthermore, paragraph 3.22 of BP1 is of course, wholly misleading as it compares housing target figures that relate to two different time periods. The 11,000 dwellings target relates to the housing requirement set out in SEP between the period 2006 and 2026 (i.e. equal to 550 dwellings per annum), whereas the Council’s reduced figure of 9,600 dwellings relates to an extended 4 year period between 2006 – 2030 which would be the equivalent of 400 dwellings per annum (i.e. a reduction of 150 dwellings per annum over the entire Plan period compared to the SEP). Thus, not only is the PSCS DPD not legally compliant in failing to be in accordance with the Development Plan (or its time period), but also it is not sound, as no satisfactory justification has been provided for the substantial reduction in the housing period and over an extended plan period. Moreover, no justification has been made as to why the council fails to take on board the evidence which clearly supports a higher housing provision than that proposed within the adopted RSS, particularly taking on board the Governments growth agenda.

Details of Changes to be Made:
We therefore suggest that the submitted Core strategy needs to be amended to take into the account the extant development plan, including the South East Plan’s housing target at the very least, but with a recognition for a higher level of growth should be planned for. At the very least therefore, there needs to be a larger degree of flexibility built into the document. Whilst the Council has within paragraphs 5.18 – 5.20, as well as policy WCS5 sought to provide a contingency within the document, this does not go far enough and needs to be far more robust to take account, as indentified above of the chronic affordable housing issues that exist within the District.
4.5 We object to policy WCS5 Managing the Release of Housing Land, figure 4 Housing Trajectory and figure 5 Phasing of Development on the grounds that phasing of development at the North Hailsham SDA should not be delayed. 4.6 The council’s grounds for phasing delivery are provided at paragraph 8.25 in BP1, “A number of developments are already underway within and around Hailsham, and as such it is considered desirable to delay the delivery of the additional housing proposed by the Core Strategy to allow this relatively weak housing market to deliver what amounts to a significant amount of growth. The need to provide additional infrastructure including transport … would also benefit from a plan period extending beyond 15 years from the date of adoption, providing the least risk to the timely delivery of infrastructure.” 4.7 This statement is entirely unjustified and is not the most appropriate strategy when considered against the reasonable alternatives. Need for greenfield sites to provide family and affordable housing 4.8 The North Hailsham SDA can provide much needed market and affordable housing, including starter homes and intermediate housing which will have the effect of strengthening the local housing market. 4.9 The Strategic Housing Market Assessment (SHMA) (Wealden Housing Market Assessment, 2007) suggests that there should be an emphasis on the provision of larger family properties in South Wealden, and a range of smaller units in north Wealden. The Core Strategy highlights that a focus on semi-detached and detached housing in south Wealden is appropriate and will help broaden the area’s housing stock, making it generally more attractive to working age families moving into the district. The SHMA recommends that within South Wealden the provision of larger dwellings (3 and 4 bedrooms) would be appropriate. 4.10 However, the projected housing trajectory (Core Strategy Figure 4) shows that a large proportion of housing completions at the start of the plan period, up to 2014/2015, will be on brownfield sites. As a consequence of planning policy, an often urban context and market viability, often brownfield sites will only support a high density housing, including a significant proportion of flats. Greenfield sites, like the SDA, will need to come forward earlier in the plan period to ensure that much needed, larger dwellings are delivered. 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Details of Changes to be Made:

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Table 8.7 of the Sustainability Appraisal highlights other advantages: “Improve the health and well being of the population The northern area shows the best potential for beneficial effects on this objective, due to potential to deliver new health facilities and open space as well as links to the new development at Hellingly Hospital that includes sports facilities, a community hall and cycle ways…” 4.13 Whilst the SA states that, “the higher land values and may be more attractive to developers we do not concur with the view that some mitigation is required to ensure the eastern location with excellent connectivity potential to the town centre is not unduly overlooked…” This would be entirely contrary to the Government’s position on housing land deliverability, the presumption in favour of sustainable development and would underestimate the benefits to the wider community to be derived from development at North Hailsham and the potential. Transport infrastructure requirements 4.14 The Core Strategy identifies a number of highways infrastructure capacity issues at Hailsham. The A271 to the north of Hailsham has poor alignment, tight bends and a proliferation of access points into individual properties, which create traffic safety concerns. The South Wealden and Eastbourne Transport Study (SWETS) (November 2010) concluded that a number of transport interventions are required to deliver the spatial strategy in the south Wealden area. 4.15 Mitigation measures are required to address capacity, safety and severance issues along the A271. The measures could include improvements at Boship roundabout and/or at the junction of A22 and Hempstead Lane. The early delivery of the north Hailsham site will facilitate the early delivery of these interventions to the benefit of the community as a whole and the traffic management of the local highway network. 4.16 The Saturn modelling that has informed SWETS will be refined and used to examine the impacts of development at both north and east Hailsham. It is expected to highlight the requirement for mitigation measures at strategic locations on the highway network many of which can only be delivered by development at north Hailsham. 4.17 Development at east Hailsham will not only impact upon the town centre but also the A271 corridor to the north where improvements need to be in place pre rather than post development. Additionally development at north Hailsham has the ability to deliver alternative alignments for lengths of the A271 thereby addressing safety and severance concerns. 4.18 A comprehensive solution will assist in the deliverability of east and north Hailsham and again supports the view that sites should not be held back artificially.
We are intrigued by the Council's intended adoption of an unsound housing position. The Council's proposals for the provision of housing development during the period 2006 – 2030 demonstrate that the Council's Local Development Framework Document is not in conformity with the Regional Spatial Strategy, which forms part of the Development Plan. Paragraph 3.3 of the Council’s Background Paper no. 1 (BP1) states “Current legislation requires that the Core Strategy is in general conformity with the Regional Spatial Strategy, the South East Plan” (SEP), which was adopted in May 2009. In paragraph 3.3 of BP1, the Council also acknowledge that “The South East Plan requires that at least 11,000 dwellings is provided in Wealden District between 2006 and 2026”. The SEP (Policy H1) requires 11,000 new dwellings to be provided in Wealden District between 2006 and 2026, equal to an overall annual requirement of 550 per year. Paragraph 3.3 of the Council’s BP1 states “Because of existing planning permissions and houses that have already been built since 2006, overall we need to find locations for a total of approximately 7,000 new houses between now and 2026”. Assuming 550 dwellings per year based on the SEP housing requirement, extending the PSCS DPD end date to 2030 (i.e. 4 more years) would require an additional 2,200 dwellings, bringing this total to the equivalent of 9,200 dwellings between 2006 and 2030. Policy WCS2 indicates that 4,889 dwellings are already committed (through planning permissions, commencements etc.) as at 1st April 2010. Set against the SEP requirement, this would leave a residual requirement for 6,111 dwellings up to 2026 (i.e. 11,000 minus 4,889) and if the SEP requirement were to be extended by 4 years up to 2030 (at 550 dwellings per year i.e. a total of 2,200 dwellings), this would create a total residual requirement of 8,311 additional dwellings by 2030. This residual requirement is the equivalent of 415 dwellings per annum during the remaining 20 year period between April 2010 and April 2030. By contrast, draft Policy WCS1 provides for a total provision of 9,600 dwellings between 2006 and 2030. Taking account of 4,889 dwelling commitments, this leaves only 4,685 new dwellings during the remaining 20 year period. This is the equivalent of only 230 dwellings per year (i.e. just over half that implied by extending the annual housing requirement set out in Policy H1 of the SEP to 2030). In draft Policy WCS2, the 9,600 dwelling figure referred to in draft Policy WCS1 has a total of 9,574 dwellings during the same 2006 – 2030 time period. The Council has not provided any justification for failing to comply with the housing requirements set out in SEP and no justification has been provided as to how the seemingly speculative figure of 9,600 dwellings or 9,574 dwellings has been arrived at for the housing requirement during the period 2006 – 2030 in draft Policies WCS1 and WCS2. As the council are aware there have been a number of recent announcements regarding the emerging Localism Bill and the changes being sought by the Government and we have looked to deal with these within our comments. As the Council is aware, Section 19 of the Planning and Compulsory Purchase Act 2004 (as amended) deals with the Preparation of local development documents. Section 19(2) specifically states that: “In preparing a Development Plan Document or any other local development document the local planning authority must have regard to (a) national policies and advice contained in guidance issued by the Secretary of State; (b) the RSS for the region in which the area of the authority is situated, if the area is outside Greater London”; (h) any other local development document which has been adopted by the authority”. The adopted South East Plan therefore remains part of the development plan and whatever the Council believes cannot be used as a reason for not complying with 19(2)(b) as this is a statutory requirement. This is particularly true bearing in mind recent appeal decisions, which confirm the status of the RSS's and the limited weight that can be attributed at this time to the emerging Localism Bill. Accordingly any DPD that appears prior to enactment of the Localism Bill which materially departs from the RSS must be found unsound given that it would not comply with statute, particularly given the Government's recent announcement that an Environmental Assessment will now be carried out to consider the removal of the RSS's. By any reasonable standard, this is likely to take a long period of time and it is therefore fair to assume the RSS’s will remain as part of the development plan for a good period to come. Nonetheless, even ignoring the above the Government remains committed to the delivery of more housing and it therefore seems perverse for the council to be attempting to adopt a strategy which seeks to reduce what should be recognised at the very least, as a minimum housing requirement. It is clear from all the above therefore that the RSS remains in law as part of the development plan and cannot be ignored, as the council appears to be seeking to do. We also refer the council back to the founding principles of the emerging local development framework. For example PPS 12 confirms that the Core Strategies; “4.36 Core strategies must be justifiable: they must be: • founded on a robust and credible evidence base; and • the most appropriate strategy when considered against the reasonable alternatives”. We question whether the council’s unjustified Housing Growth figures meet this simple test as presently emerging and
we maintain therefore that the Councils emerging Core Strategy is not only deficient because it ignores the adopted RSS, but it also not founded on the most up to date evidence base. Perhaps, however most importantly we draw the council’s attention to the evidence base it has at its disposal and indeed comments it makes in supporting documents for this Core Strategy. Paragraph 5.3 of the “Managing the Delivery of Housing Background Paper” – Background Paper 2 notes that “the Councils Housing Needs Assessment highlights the acute level of affordable housing need within the District and it is noted that the main means of achieving affordable housing delivery is by the means of the construction of market housing…” Paragraph 6.11 of the same document goes onto confirm that “on this basis, the assessment has identified an annual affordable housing need of 812 in Wealden”. On the basis that the delivery of affordable housing, as accepted by the Council is predicated on the delivery of market accommodation, the evidence supports a much higher level of growth than that envisaged by paragraphs 3.8 – 3.17 and more importantly policies WCS1 and WCS2 of the consultation document. Indeed, it is obvious from the above that a target of 4,685 new homes over the period 2006 – 2026 is neither robust or indeed accurate and would continue to exacerbate the ongoing chronic housing deficiencies in the district. Furthermore, paragraph 3.22 of BP1 is of course, wholly misleading as it compares housing target figures that relate to two different time periods. The 11,000 dwellings target relates to the housing requirement set out in SEP between the period 2006 and 2026 (i.e. equal to 550 dwellings per annum), whereas the Council’s reduced figure of 9,600 dwellings relates to an extended 4 year period between 2006 – 2030 which would be the equivalent of 400 dwellings per annum (i.e. a reduction of 150 dwellings per annum over the entire Plan period compared to the SEP). Thus, not only is the PSCS DPD not legally compliant in failing to be in accordance with the Development Plan (or its time period), but also it is not sound, as no satisfactory justification has been provided for the substantial reduction in the housing period and over an extended plan period. Moreover, no justification has been made as to why the council fails to take on board the evidence which clearly supports a higher housing provision than that proposed within the adopted RSS, particularly taking on board the Governments growth agenda.

Details of Changes to be Made:

We therefore suggest that the submitted Core strategy needs to be amended to take into the account the extant development plan, including the South East Plan’s housing target at the very least, but with a recognition for a higher level of growth should be planned for. At the very least therefore, there needs to be a larger degree of flexibility built into the document. Whilst the Council has within paragraphs 5.18 – 5.20, as well as policy WCS5 sought to provide a contingency within the document, this does not go far enough and needs to be far more robust to take account, as identified above of the chronic affordable housing issues that exist within the District.
Details of Reasons for Soundness/ Legal Compliance:

3. We agree with the underlying objectives for the housing trajectory to ensure that there is a continuous supply of new housing over the plan period that takes account of market conditions, the ability for communities to assimilate new development and the provision of the necessary infrastructure. However whilst Policy WCS5 does include flexibility in itself, and this is implicit in the housing trajectory (figure 4) which is referred to in Policy WCS5, the status of figure 5 is unclear and the wording in paragraph 5.16 reduces the flexibility. For example, it is suggested that development at south Polegate and east Willingdon (SD4) will be phased to commence from 2019 to enable integration of development in relation to transport infrastructure requirements and interventions in south Wealden. Transport analysis undertaken on behalf of our client suggests there may well be scope for some development before this date. We do not consider there is any advantage in artificially delaying the commencement of development if there is no good reason to do so. This approach would be consistent with paragraph 7.4 where it is stated that development should make the most effective use of existing infrastructure. It is possible to phase housing development to take advantage of existing infrastructure and ensure a satisfactory supply of housing is achieved and development should not be hindered by more strategic infrastructure concerns. One of the advantages of the area identified for growth in Polegate is that it will integrate more naturally into the existing built form, rather than satellite locations with intervening movement constraints such as main roads etc, will help to minimise the use of cars and therefore will create less need for highway infrastructure improvements. 4. The infrastructure constraints of the various Strategic Development Areas in the Core Strategy will become clearer through the Strategic Site Allocations DPD and we consider that more detailed phasing guidance should await this document and not be included in the Core Strategy. In addition the introduction of the Community Infrastructure Levy by 2014 may give better opportunities to fund transport (and other) infrastructure than has been the case in the past. In addition, Policy WCS7 (Effective Provision of Infrastructure) ensures that the release of land for development is conditional upon there being sufficient capacity in the existing local infrastructure to meet the requirements generated by the proposed development.

Details of Changes to be Made:
2.41 We consider that WCS5 could be improved by ensuring that specific criteria are set out to allow contingency sites to come forward in the event that a ‘Plan B’ approach is required. We also consider that reference to ‘adjusting the pace of housing delivery’ is removed. 2.40 We therefore recommend the following amendment to Policy WCS5: ‘The release of land for housing will be managed so that it will deliver the level and broad distribution of development as set out in Policy WCS2 and at the rate set out in the housing trajectory. The release of land will be dependent on the timely provision of infrastructure necessary to deliver housing, including affordable housing. The adequacy of housing land supply will be assessed regularly through the reviews of the Strategic Housing Land Availability Assessment, the Infrastructure Delivery Plan and through regular housing land availability monitoring. Depending on the results of monitoring, it may be necessary to adjust the pace of housing delivery by encouraging, or holding back, new development. to implement contingency sites as identified at any accessible greenfield land, which is well related to the existing urban areas; § Can be served by existing or new infrastructure; § Have good access to public transport services, footpath and cycling networks’ (proposed alteration: Strikethrough shows removal of existing text, underline shows insertion of additional text) 2.42 BP11: Infrastructure Delivery Plan is an integral part of the Evidence Base and is fundamental to ensure the delivery of the strategy. Notwithstanding that we are supportive of the contingency approach, we are concerned as to how the potential contingency sites could still be delivered in the event that the preferred sites and associated ‘critical’ infrastructure are not delivered and thus the housing target. 2.43 PPS12 para 4.46 relates to flexibility and in part states, ‘Plans should be able to show how they will handle contingencies’. Furthermore, paragraph 23 of ‘Learning From Experience’ Guidance states ‘where an element of infrastructure is critical but it is uncertain whether it can be delivered, the plan should deal with the question of what the consequences are and what contingency arrangements may be possible – in other words the ‘what if’ question’. 2.44 BP11: Infrastructure Delivery Plan is not clear as to how the/any contingency sites would deliver the necessary or alternative infrastructure requirements to ensure the level of growth required is achieved. The IDP should identify what the thresholds for growth are before the ‘critical’ elements of the IDP are required to be delivered. At what point do the contingency sites begin to be considered? We consider the future housing capacity at the growth locations needs to be made clearer in the context of the existing infrastructure constraints in order to become more ‘effective’ as a strategy. 2.45 In relation to Heathfield, Table 5 (p41) of BP11: Infrastructure Delivery Plan reinforces the suitability of Heathfield’s proposed growth and early delivery by identifying that there are no critical pieces of infrastructure required to be delivered prior to the development of SD11: North West Heathfield. Notwithstanding the lack of education data within Table 5 of BP11: Infrastructure Delivery Plan, we have provided within Appendix B to these representations, our understanding of the current and future local education capacity as of October 2010. Appendix B demonstrates there is sufficient future capacity in the local schools to accommodate the proposed...
levels of growth without any need to provide for ‘critical’ pieces of infrastructure delivery, other than those required through standard Section 106/CIL Contributions. 2.46 We therefore consider with the amendment to Policy WCS5 as set out above, and a clearer understanding as to how and when the implementation of contingency sites may begin, Policy WCS5 provides for a strong policy basis to deliver the strategy. It is therefore considered that subject to the above change, WCS5 is both ‘justified’ and ‘effective’ and therefore ‘sound’.

Details of Changes to be Made:
The release of land for housing will be managed so that it will deliver the level and broad distribution of development as set out in Policy WCS2 and at the rate set out in the housing trajectory. The release of land will be dependent on the timely provision of infrastructure necessary to deliver housing, including affordable housing. The adequacy of housing land supply will be assessed regularly through the reviews of the Strategic Housing Land Availability Assessment, the Infrastructure Delivery Plan and through regular housing land availability monitoring. Depending on the results of monitoring, it may be necessary to adjust the pace of housing delivery by encouraging or holding back, new development to implement contingency sites as identified at any subsequent Site Specific Development Plan Document, "Contingency sites should be subject to the following selection criteria: Are at sustainable locations, maximise the use of brownfield land Utilise sustainable and accessible greenfield land, which is well related to existing urban areas Can be served by existing or new infrastructure Have good access to public transport services, footpath and cycling networks

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WCS5 Managing the Policy 5 Release of Housing Land

Sound ☑ Yes ☑ No ☑ Justified ☑ Effective ☑ Consistent with national policy

Legally Compliant ☑ Yes ☑ No

Details of Reasons for Soundess/ Legal Complaince:
Policy WCS5 is superfluous, unnecessary, is not supported by evidence and directly conflicts with the Government’s “Planning for Growth” agenda and more specifically the statement made by Rt Hon Greg Clark MP on 23 March 2011, which clearly sets out the Government’s expectation that development and growth should wherever possible be supported and that Local Authorities should plan “positively for new development” …and…”a flexible and responsive supply of land” and not prejudice development by imposing unnecessary restriction such as those proposed in Policy WCS5.

Details of Changes to be Made:
Policy WCS5 should be deleted.
Summary of all Representations - Proposed Submission Core Strategy Regulation 27 - Report 11th July 2011

Representation ID
1656

Person ID 516047
Agent ID 516026

Rydon Homes Ltd
Sigma Planning Services

WCS5 Managing the Release of Housing Land

Policy 5

Sound ☑ Yes  ☐ No  ☑ Justified  ☑ Effective  ☑ Consistent with national policy
Legally Compliant ☐ Yes  ☐ No

Details of Reasons for Soundness/ Legal Complaince:
The CS should take the lead in identifying future infrastructure requirements and tying their implementation into the rate of delivery of housing and employment. There should be no need to delay development to await infrastructure provision. The admission of this caveat detracts from the certainty of implementation and leaves the implementation of the plan proposals in the hands of statutory undertakers who should clearly understand what is required of them rather than be given the succour of an acceptance that they are controlling the delivery of development

Details of Changes to be Made:
Achieve the implementation of the plan proposals through securing the planned rate of infrastructure provision in parallel with the rate of development. Provide certainty of timing for the benefit of developers and infrastructure providers alike.

Representation ID
1586

Person ID 522137
Agent ID

Ognjanovic
Polegate Town Council

Paragraph 6.1

Sound  ☐ Yes  ☑ No  ☐ Justified  ☐ Effective  ☐ Consistent with national policy
Legally Compliant ☐ Yes  ☐ No

Details of Reasons for Soundness/ Legal Complaince:
6.23 states 'the A2270 running through the urban area is still heavily congested and traffic flows on the strategic road network are very high'. Numerous references are made throughout the strategy to the need for infrastructure, and 5.16 states 'development at SD4 will be phased to commence from 2019 to enable integration of development in relation to transport infrastructure requirements and interventions in South Wealden'.

Details of Changes to be Made:
PTC has serious concerns over the impact of any additional vehicles on the heavily congested road network, and feel that the proposed transport strategy is unsound because of the numbers of extra vehicles any development would bring onto the A2270.
Details of Reasons for Soundness/ Legal Compliance:

Omission in Section 6 We are please that the Core Strategy acknowledges that odour control issues will need to be investigated in relation to development SD2 (east of Hailsham). It is imperative that the same acknowledgement is also included for SD1 (West of Uckfield) due to its location adjacent to the wastewater treatment works and in light of the recently published standards for odour by the Environment Agency. The Core Strategy is not sound because it is: Not justified as it does not rely on the evidence base available and that we have previously provided. Not effective as it does not consider all of the requirements to successfully deliver the west of Uckfield development.

Details of Changes to be Made:

We propose that odour control issues are acknowledged at the first bullet point on page 32 in relation to land west of Uckfield in the same way that they have been at the third bullet point regarding land east of Hailsham. We also request that an additional paragraph is inserted after paragraph 6.11 acknowledging the need for an odour control study to be carried out regarding the proposed site west of Uckfield when is located adjacent to a waste water treatment works.
Many of the aims set out for Uckfield seems to be contradictory, as well seemingly to be undeliverable or the chosen land is unavailable. As set out there are congestion problems in the town centre and the Framfield Road junction. Proposals to deal with this have been mooted for the last 5 to 7 years though no detail or costings have yet been produced. The only consultation some years ago only really amounted to a scheme to promoted by Tesco’s to meet their aim for a larger supermarket. This traffic proposal appears to involve a gyratory scheme though again no great details has ever been produced, and it appears to have major problems due to the various landowners not agreeing to join in. However whatever the scheme may be, it may cope with the current traffic levels but it would seem this will be totally negated by the proposed additional housing, retail and employment development. It is proposed to allow much larger supermarket space in the town centre plus an additional unspecified number of houses. Additionally the proposed SD1 allocation with no identified access at the moment can only realistically come out on the New town Road, since it would seem unlikely that the access to a large housing estate can go through the Bellbrook Industrial Estate. Thus all this extra development will immediately need to use any modified road scheme and just end up causing as much congestion if not more, as the current road system has, thus totally negating any road improvements. This is without even considering the negative effect of the council’s choice of limiting village growth, which will continue the decline of villages and their services, particularly local shops. Thus as all the supermarket space for the area is proposed to be in Uckfield Town centre even more rural dwellers will need to access this area as their local services die out adding even further to the congestion problem. The council are relying on the new houses to fund the town centre redevelopment, yet do not appear to have produced any figures to show how this will happen, or whether 1000 houses are too many or not enough. Similarly generally recent new housing has been looked on as the milch cow to provide everything to do with infrastructure and local services, yet the council do not either seem to have considered whether the funds they require per new house will make SD1 non viable to housing developers, at this time of national economic problems and falling house prices. The objectors have been involved in making submissions to local planning for 25 years. It appears to the objectors that WDC are totally incapable of dealing with any matters properly, and usually take 5 years to do what should be done in 1 year. Thus in this case it is only 4 years before the town centre plan and housing allocation should be started. Yet the proposals at the moment seem to be just a wish list of hopes with nothing behind them. What is the likelihood that a town scheme will be detailed and agreed with all, planning permission granted, S106’s matters detailed and agree, early infrastructure agreed, planning granted and it put in place, site DS1 sorted out, especially the access and planning and S106 matters sorted, so work on all this can start by 2016???? the answer is virtually nil as 4 years to far too short with all the parties and complications involved, plus it is likely to be another 2 years before and LDF is in place at best. The other main problem is that the land for SD1 does not appear to be available. The objectors are acquainted with the owners of the land, Ridgewood Farm who told the objectors only in recent months that they have been fighting development of 40 years an don’t want it on their land. So unless this has changed since, it would appear this land is unavailable for the development proposed. Presumably the council addes the site to the SHLAA themselves, and not the landowners. This allocation again shows how the council have incorrectly used the SHLAA, since only land that is available and deliverable should be considered for allocation. Not only does the land appear unavailable, but since the council have no idea where the access would be it, though 2 would be needed for such a large estate, it would appear undeliverable for this reason as well, so should not have been considered. It should also be noted that the towns sewage works is sited here, which would impact badly on any new housing or employment areas here, particularly as it would presumably need to be enlarged. Equally it would hardly be a nice green area to walk around either where the area near it to be POS. This site would also seem to be contrary to the council’s and national policy on landscape effect as it is on the highest ground for miles and is very open to short and long views. Many other sites in the SHLAA have been rejected for much less landscape effect than this. The plan on fig 6 shows 2 areas of green infrastructure potential. However the one next to the Bellbrook estate is a thin strip between the link road and existing housing mainly consisting of a tree covered noise bund, so it is difficult to see what extra could be done here. The area to the south goes off of the SD1 site into land in other ownership, and even were SD1 to ever happen, it is hard to see why other landowners would add their land in without considerable financial incentives which are not usually available for separate potential green land. Thus all in all the proposals in this area seem completely unsound and contrary to normal planning policy.
Details of Changes to be Made:
Site SD1 should be removed as it is undeliverable and unavailable. Some of the allocation can be moved to Maresfield as detailed in other objections, due to the adjacent Ashdown Business Park. Some of the allocation can go to deliverable and available sites around Uckfield, where they won’t impact so greatly on the town centre traffic. Some can also go to the extra village allocations as set out in objections to WCS6.

Representation ID
388
Person ID  Mr  Eddison  Agent ID  Mr  Ide
521943  Batcheller Monkhouse  335759  Batcheller Monkhouse

Uckfield Area Strategy  Figure 6

Sound  ☑ Yes  ☐ No  ☑ Justified  ☐ Effective  ☐ Consistent with national policy
Legally Compliant  ☑ Yes  ☐ No

Details of Reasons for Soundess/ Legal Complaince:
The identification of urban extensions is supported in principle. The policy identifies 12 Strategic Development Areas, all of which vary considerably in character. Not all of proposed Strategic Development Area SD1 (Uckfield) is suitable for development. Uckfield is identified as having a key role in assisting with the delivery of the Core Strategy up to 2030: the strategy for Uckfield specifically is to enhance the role of the town as a District Level Centre, serving the local community and surrounding area. Para 6.11(3) states inter alia that the identification of SD1 as an allocation is subject to the provision of suitable access and a number of other factors, with these to be addressed in subsequent DPDs, and which may increase the risk to delivery. The Core Strategy recognises that if development has not started at West Uckfield by 2016, a review in relation to Uckfield will be required. Whether development has started by 2016 is one issue. Others are: i.Whether it is genuinely appropriate for development to take place over the whole allocation as indicated in the key diagram. The Sustainability Appraisal of the Proposed Submission Core Strategy, Background Papers, February 2011, recognises this issue by stating “potential landscape issues as the area is on high ground” (p.217). i. The uncertainty regarding what further studies may reveal about the practical ability of the site to accommodate development. If development has not commenced before 2016, the Council should know before then whether a review of the Core Strategy is required; why should the Core Strategy limit the potential scope of any review to the Uckfield area (Para 6.11)? SD1 is supported to the extent that it relates well to the strategic highway network. The impact of residential and other development upon SD1 will however be too prominent and intrusive along this part of the A22 corridor. Much of the development will not be easily capable of being screened. The southern part of SD1 is most exposed. It is recommended that the most sensitive landscape is retained in SD1 as open space and, as a consequence, that SD1 be extended to the south of Lewes Road to include Horsted Pond Farm and Ridgewood House – any development here could be better accommodated within the landscape. SD1, as presently drawn, is too narrowly defined in extent – the inclusion of Horsted Pond Farm and Ridgewood House within it would provide the Plan with flexibility in delivering new development to the west of Uckfield. Proposed Change

Details of Changes to be Made:
It is proposed that the SD1 allocation be extended to include Horsted Pond Farm (in part of in whole) and Ridgewood House, with consequential changes made to the Core Strategy and Key Diagram.

Representation ID
318
Person ID  Mr  Pope  Agent ID
106342  Downlands Action Group

Uckfield Area Strategy  Figure 6

Sound  ☑ Yes  ☐ No  ☐ Justified  ☐ Effective  ☐ Consistent with national policy
Legally Compliant  ☑ Yes  ☐ No

Details of Reasons for Soundess/ Legal Complaince:
This appears to be the most logical and sustainable proposal for the development of Uckfield.

Details of Changes to be Made:
Representations on behalf of the Clarence Preston Will Trust: Policy WCS4 These representations are on behalf of the Clarence Preston Will Trust, freehold owners of Downlands Farm, Uckfield. While the selection of Uckfield as a location for further strategic growth with a new allocation of 1,000 dwellings in Policy WCS2 is strongly supported, the identification of a sole strategic development area at “West Uckfield” is not justified, is unlikely to be effective and would be contrary to national policy in its environmental and landscape impact. The selection of the proposed development area SD1 West Uckfield is based, so far as can be judged from the published background papers, on a fundamentally flawed approach to the assessment of the strategic development options for for Uckfield. For each town “broad locations” have been assessed and compared against each other and against sustainability criteria. The broad locations for Uckfield, however, exclude one of the principal potential areas, Downlands Farm, which in the non-site-specific CS vocabulary can be called North West Uckfield. Figure 1 of the Development of the Proposed Submission Core Strategy Background Paper shows that four broad areas were appraised: North, West, East and South Uckfield respectively. The broad north-west sector (principally Downlands Farm) is not included in the appraisal. There is no explanation for this. The site was subject to a planning appeal (together with sites at Bird-in-Eye Hill) which was dismissed and the site was subsequently deemed “unsuitable” in the SHLAA. However, this is not sufficient reason for omitting it from consideration altogether. The Bird-in-Eye sites were considered under the heading “East Uckfield”. Circumstances have changed since the appeal determination and the SHLAA, which based its conclusions substantially on the appeal decision. The requirements for broad location selection for CS purposes, differ from the considerations in appeal decision in the following critical respects: 1. The appeal was determined on the basis that a major peripheral expansion of Uckfield was not in accordance with the South East Plan. The draft CS is not being prepared in relation to the South East Plan and it proposes a major peripheral expansion of Uckfield, albeit in a different location. 2. The housing land supply position for the CS period is wholly different from the basis on which the appeal was determined. 3. The landscape conclusions in the appeal were in comparison with the sites at Bird-in-Eye Hill not with West Uckfield. There should have been a comparative landscape assessment between Downlands Farm/North West Uckfield and West Uckfield for the purpose of broad location selection in the CS process. There has been none (at least in published form) and this is a fundamental failure of the process that is highly prejudicial to the land at North West Uckfield. 4. Similarly with highways and ecology. There has been no proper comparison in the location selection process between the two main competing locations at Uckfield. The SHLAA report for Downlands Farm refers directly to the appeal decision. It is clear that there was no detailed re-examination of the comparative merits of all the major alternative strategic development locations around Uckfield. On the site specific issues, the SHLAA report gives only a superficial picture. For example, it concludes that the development of Downlands would “compromise its nature conservation integrity and biodiversity interests” whereas the inspector’s conclusion was that permission should not be refused outright on the basis of harm to its ecology or biodiversity.

Details of Changes to be Made:
There are landscape issues affecting both West Uckfield and North West Uckfield. These have not been compared in the CS process. The Council’s own comparative landscape analysis in 2001 concluded for West Uckfield (then referred to as Sector 3) “The broad, rolling landform ensures that most of the landscape is clearly visible and any large-scale development is likely to have a widespread influence, particularly along the elevated ridge-tops where it would impact upon the surrounding countryside”….”The characteristic open, visually exposed and rural qualities of this landscape make it highly sensitive to any form of significant new development”. The SHLAA report concluded that approximately two-thirds of the site is considered unsuitable for housing in view of the harmful effect it would have on the landscape. The choice between these two peripheral sectors of Uckfield for urban extensions should have been subject to rigorous comparative analysis. That has not taken place and the Council has relied on the findings of a planning appeal that was held in an entirely different context and where the comparative merits of West Uckfield were not a matter for consideration. The omission from consideration of one of the main undeveloped peripheral sectors of Uckfield, particularly one with a complex planning history, is a significant failing in the draft document. These process failings render the CS Policy WCS4/SD1 unsound. To avoid compromising the CS as a whole, an option would be for the Council to redraft SD1 in more general terms without specifying locations or sectors at Uckfield. This would leave the detailed comparative site analysis where it should properly be, namely at site specific DPD stage. As a general comment, the way the Council has dealt with the housing distribution issue is closer to site specific allocation than it should be at Core Strategy stage of the LDF.
Uckfield Area Strategy

3.6. Uckfield Area Strategy 3.6.1 Whilst the general thrust of the strategy is supported it is considered that certain elements are inappropriate and require amendment. As such although considered to be legally compliant the Core Strategy is considered to be unsound for these elements. 3.6.2. It is considered that the allocation of the land at West Uckfield is not appropriate. Consequently it is considered that this element of the Core Strategy should be removed. Whilst the level of growth proposed at Uckfield is supported it is considered that alternative locations for development exist which are more appropriate and able to achieve the Council's overall objectives for development. It is considered that our clients' landholding at Bird in Eye South represents one of these alternatives and has the potential to provide approximately 200 dwellings as an effective and logical urban extension to the settlement. The site is of course adjacent to the Mallards Drive Non-Statutory Local Plan allocation which has received planning consent, demonstrating the suitability of this part of Uckfield for development. In the light of the Council's recognition that the strategic development areas are critical to delivery of the overall strategy, and to ensure housing delivery, the allocation of a strategic development area at Bird in Eye South for 200 dwellings would meet this objective. Indeed, in terms of scale, it would be in line with a number of the other proposed SDAs (for example land east and south-east of Stone Cross (SD6), land south-east of Crowborough (SD10) and land to the north-west of Heathfield (SD11). 3.6.3. Before considering the merits of our client's land in more detail, we consider the appropriateness of proposed SD1. We start with the Council's Strategic Housing Land Availability Assessment (SHLAA). We note that the Council has prepared an update, via an addendum to its evidence base in October 2010. The update includes a number of sites but in respect of Uckfield the principal change affects site reference 346/1410, Ridgewood Farm, Lewes Road, Ridgewood. It would appear that this land holding broadly coincides with the proposed SDA, SD1. para. 1.5 of the Addendum states that further assessment of site potential in the areas considered for town extensions has been undertaken, including connectivity to local services and facilities, highway network capacities and infrastructure requirements. However Para 1.4 notes that this addendum report has taken account of the Council's emerging preferred spatial strategy. It is not clear how this specifically sits within the evidence base, alongside the original assessment of sites (in particular those that have not formed part of the eventual strategy, and have not been reassessed). We comment upon this further below in relation to our clients' land. 3.6.4. In relation to Ridgewood Farm, a substantial number of constraints are identified in the summary of its suitability. This summary highlights the following constraints. a. this is a substantial undulating site, a significant part of which (in the south) is prominent in the wider landscape and exposed to views from the Uckfield bypass (A22). b. It appears that only parts of the northern and central parts of this large site, together with some of the low lying land within the southern part of the site, are considered to be suitable for housing and could be considered as a logical extension to the urban area of the town. c. there will be a need for significant landscape buffer zones throughout the site to strengthen the landscape structure and create a new edge to the countryside. d. The existing access to the site would not be acceptable to serve further development on the scale envisaged and new vehicular access points will be required on to the A22. A full transport assessment would be necessary, and a caveat is adequate pedestrian, cycle and bus connectivity with the town centre. e. It is noted that there is potentially contaminated land associated with the sewage treatment works and within the site to the east, and that the extent of this and the implications will need to be the subject of further technical appraisal. f. The western edge of the site is within the Flood Zone 3, which also crosses the southern part in a fairly narrow band along the stream. g. It is noted that the western part of the site is affected by traffic noise from the A22 and any scheme designed will need to take this into account, as well as needing to mitigate possible noise issues from the sewage treatment works and the industrial area to the north. It is also noted that there may be an adverse impact from odour from the sewage works which requires more detailed assessment. 3.6.5 In respect of availability the SHLAA states that the site is controlled by multiple land owners. From our discussions with the Planning Department, we understand that the site was submitted by an agent on behalf of the landowners. The absence of a developer does not provide any viability evidence that has been undertaken to support this claim; c. The Council notes that the capacity of a developer to complete and sell housing in this area is considered to be good. However, as we note above we are not aware that a developer is involved in the site. d. The Council notes that there is a reasonable prospect, subject
to development plan policy that a proportion of development could be delivered in the short term. Without a substantial range of assessments being undertaken, and support for this site from a developer, there is no basis for this statement. 3.6.7. In respect of strategic infrastructure, the Council notes that there are a number of factors, including waste water treatment, Uckfield Town Centre traffic management, and improvements to bus services and infrastructure connections to Uckfield that would need to be considered. It is noted that in addition to residential, employment and potential education provision are anticipated. The above are clearly a range of constraints and uncertainties. In order to satisfy paragraph 54 of PPS3: Housing, local planning authorities should identify sufficient specific "deliverable" sites for the first 10 years of the plan. In our view the tests of deliverability, i.e. the assessments of availability, suitability and achievability are not met at this stage. It would therefore not be justifiable or effective for the Plan to go forward with a strategic site on this basis. We consider that far greater certainty can be provided if a strategy for Uckfield were adopted that included sites that are deliverable, such as our client's site at Bird in Eye South, and only if sufficient further evidence was available, should other locations be considered as part of this Core Strategy process (including that at Ridgewood Farm). 3.7 Land at Bird in Eye South 3.7.1. The site has previously been the subject of a Planning Appeal which resulted in a rigorous assessment of the site by both the Planning Inspector and the Secretary of State (SoS). The assessment included consideration of the potential impact of the development in relation to the following: a. Landscape - the SoS agreed with the Inspector that "there are no cogent reasons to resist the BIES proposals purely on landscape grounds". b. Ecology - The SoS agreed with the Inspector that there was no sound case for rejecting the BIES scheme "on the grounds of any harm to ecological/nature conservation interests". c. Transport Sustainability - The SoS agreed with the Inspector that the BIES site was advantaged in terms of its "intrinsic accessibility and sustainability". d. Impact on Uckfield Town Centre - Both parties were required to consider the impact of traffic through the town centre. In respect of this the the County Council determined that there was headroom to develop approximately 300 units within Uckfield prior to the implementation of a town centre improvement scheme being required. In respect of this issue it was therefore considered that the development of the site would in fact provide an early contribution to the proposed town centre improvement scheme. e. Effect on Listed Buildings - Like the Inspector, the SoS was satisfied that the setting of the nearby Grade II Listed Oast House would not be materially harmed by the BIES proposal. 3.7.2 Further to above, it was no surprise that both the SoS and Inspector in their conclusions determined that the bird in Eye South site was suitable in terms of the development proposed. However, key to the determination of the Appeal was that, at the time of the Inquiry, it was considered that there was no requirement for greenfield releases. The SoS therefore took the stance that in the absence of there being a good case to release greenfield sites at that time, it would be "preferable for housing sites to come forward via the LDF process, and in tandem with a town centre traffic scheme". The Council now considers that there is a need for greenfield releases around the town. 3.7.3 The Council has, therefore, considered that Bird in Eye South (Site Ref: 002A/1410) is suitable. It has referred to the appeal decision and the reference to the site being considered as a "natural or logical extension to the urban area". All of the issues that were of a technical or environmental nature were addressed prior to the appeal decision, and the Inspector, and in turn the SoS were therefore mindful of this information in coming to the above conclusion. This is acknowledged in the SHLAA summary of suitability. There are no major factors of concern, which contrasts substantially with the position relating to Ridgewood Farm 3.7.4. In terms of availability, it is noted that the site is in dual ownership and is assessed to be available for housing. Reference is made to the need for a Grampian condition to deal with the pedestrian/cycle link. Other than this, as fully rehearsed through the appeal process the site is deliverable. It is in the control of a consortium of developers, Gallagher Estates Limited, Heron Land Developments Limited and Persimmon Homes Limited. 3.7.5. In terms of achievability the Council has correctly determined that the site is suitable, available and economically viable with the capacity of a development to compete and sell the housing in the area considered to be good. However, it states that there is a reasonable prospect that in the short term a proportion of housing could be delivered with the remainder in the medium - long term. We consider that this assessment, which is the same as Ridgewood Farm is not appropriate. As we have noted above, the constrains relating to Ridgewood Farm would substantially delay the deliverability of the site, in contrast to our clients’ land which we believe could be delivered, in large part, in short term. 3.7.6 We are aware of the strategic infrastructure requirements which are set out in the SHLAA. 3.7.7. In summary, we stress the suitability and availability of our clients’ site, which was considered through the Planning Appeal process with a positive outcome in terms of detailed, site related, planning issues. We would also like to indicate our willingness to work with the Council to promote the Bird in Eye South site through the LDF process in particular the Site Allocations DPD, consultation on which is anticipated in late-Summer/early-Autumn 2011. 3.7.8 We therefore consider that land at Bird in Eye South should be a SDA, identified in this Core Strategy for commencement around 2013. 3.8. Other Matters. 3.8.1 Concern is also raised regarding the reference to the safeguarding of a potential rail link extension to Lewes where it would connect to another part of the national network. As highlighted in the Core Strategy there is no current operational or business case to reinstate the line to Lewes and this is a view we support. The Council however consider that circumstances and criteria for assessment of any business may change in the future and the Council continues to support the principle of the rail link extension. 3.8.2. Whilst we consider that there is a high demand for housing within Uckfield and that further development within the town would be easily occupied, we do not consider that many of the new residents would wish to access Lewes by rail. Rather, it would be more likely that they would be located to Uckfield to benefit from its existing rail service to London Bridge, which is of considerable benefit to the town. We therefore seek the removal of the potential rail link from the vision, on the basis that there is no demand for the service. In our
opinion, the Council's vision should be to continue to support the accessibility links which have been successful within the district such as the London - Uckfield link by locating additional housing to these areas to ensure its long term vitality. 3.8.3. As a result we consider that this element of the Core Strategy is unsound as there is no justification for the safeguarding of the link as identified by the recent studies referred to by the Council. Reference to this element should therefore be removed from the Core Strategy.

Details of Changes to be Made:

3.8. Other Matters. 3.8.1 Concern is also raised regarding the reference to the safeguarding of a potential rail link extension to Lewes where it would connect to another part of the national network. As highlighted in the Core Strategy there is no current operational or business case to reinstate the line to Lewes and this is a view we support. The Council however consider that circumstances and criteria for assessment of any business may change in the future and the Council continues to support the principle of the rail link extension. 3.8.2. Whilst we consider that there is a high demand for housing within Uckfield and that further development within the town would be easily occupied, we do not consider that many of the new residents would wish to access Lewes by rail. Rather, it would be more likely that they would be locating to Uckfield to benefit from its existing rail service to London Bridge, which is of considerable benefit to the town. We therefore seek the removal of the potential rail link from the vision, on the basis that there is no demand for the service. In our opinion, the Council's vision should be to continue to support the accessibility links which have been successful within the district such as the London - Uckfield link by locating additional housing to these areas to ensure its long term vitality. 3.8.3. As a result we consider that this element of the Core Strategy is unsound as there is no justification for the safeguarding of the link as identified by the recent studies referred to by the Council. Reference to this element should therefore be removed from the Core Strategy. 4.1 In summary we recommend that the following changes be made to the Core Strategy:- 1. Policy WCS4 - the inclusion of an additional strategic development area - SD: Land at Bird in Eye South, Uckfield. 2. Policy WCS4: the inclusion of strategic development area - SD1: Land at West Uckfield, only following further investigations and with a substantial reduction in the number of dwellings to a figure that reflects certainty of the deliverability of that number. 3. Figure 5. Phasing of Development - the phasing schedule to be amended to reflect the above, to include Bird in Eye South for 200 dwellings, and assign it to years 2013/14 - 2016/17 for delivery. 4. Chapter 6 - Uckfield area strategy: this subsection should reflect the above, in particular at para 6.11 to include Bird in Eye South for 200 dwellings as well as through amendments to Figure 6: Uckfield Area Strategy
7 Landscape 7.1 Introduction 7.1.1 In this section of the report we present our representations in regard to landscape matters in and informing the Core Strategy. Our representation is made in regard to paragraphs 3.30 – 3.33 of the submission Core Strategy, Policies WC4 and WC13 and supporting background papers. 7.1.2 For the purposes of this representation we have reviewed the ‘Landscape Character Assessment and Development Option Evaluation Study’ undertaken for the district (referred hereinafter as the ‘Landscape Study’), which is included as a background paper to the Core Strategy on the Councils website. However, it is not clear how the Landscape Study has been used to inform the spatial strategy as it is not specifically referred to in the text of Core Strategy nor is the Landscape Study listed as a background paper at paragraph 1.7 of the Core Strategy (although it is included as a background paper on the Councils website). 7.1.3 We have reviewed the methodology set out in the document and we have also reviewed whether the methodology has been consistently applied resulting in a final report that is robust, thorough and transparent and one that would form a credible evidence base suitable to inform the spatial strategy contained in the Core Strategy. 7.1.4 We contend that the Landscape Study is flawed and therefore the assessment of housing sites in the district, the spatial strategy and the Councils Sustainability Appraisal, and thus the Core Strategy, is unsound. 7.1.5 Our representation is summarised below: Section of Core Strategy: Spatial Planning Objectives 1, 3 and 11, Paras 3.30 - 3.33, Policy WCS4 Strategic Development Areas, Figure 6 Uckfield Area Strategy, Paras 6.9 and 6.11, Policy WSC13 Green Infrastructure, Paras 7.23 - 7.28Legally Compliant: -Sound: NoJustified: NoEffective: -Consistent with national policy: No Proposed Submission Core Strategy Paragraphs 3.30 – 3.33 7.1.6 Paragraph 3.30 of the Proposed Submission Core Strategy refers to Wealden’s environmental attributes and that they have an important part to play in the development of the spatial strategy and ‘had a significant impact upon the assessment of the suitability of housing land in relation to the SHLAA’. 7.1.7 Paragraph 3.30 goes on to state that: “...and sites have been carefully scrutinised with regards to landscape impact.” 7.1.8 Paragraph 3.33 refers to Government guidance and the level of protection this provides for the environment, particularly nationally and internationally designated sites, which are not duplicated in the Core Strategy. The paragraph goes on to state: “However, our strategy has been guided by high levels of protection on local and national levels, and more detailed policies are contained within the Core Strategy and further ones in subsequent DPDs.” 7.1.9 Paragraph 1.7 in the Introduction to the Core Strategy refers to a number of specialist studies that have been produced to provide a robust evidence base to inform the Local Development Framework. The Landscape Study is not listed as a background paper at paragraph 1.7 of the Core Strategy (although it is included as a background paper on the Councils website). Policy WCS4 Strategic Development Areas and Paragraphs 6.9 and 6.11 7.1.10 The Core Strategy proposes that the land to the west of Uckfield be identified as a ‘strategic development area’ suitable for accommodating 1,000 homes and some 12,650 sq metres net of employment floor space and education provision as an extension to the urban area to the west of New Town. Paragraph 6.9 refers to the SHLAA and assessment of the potential sites at the fringes of the urban area. 7.1.11 In the light of the comments that follow in this section of our representations on the Landscape Study, it considered that this proposal be reassessed and, taking into account other representations made on other parts and policies contained in the Core Strategy, greater emphasis should be given to the suitability of land at Maresfield to accommodate increased housing numbers and a larger proportion of the housing requirements for the district. Policy WSC13 Green Infrastructure, Paragraphs 7.23 - 7.28 and Background Paper BP6 7.1.12 Policy WSC13 and paragraph 7.23 to 7.28 relating to Green Infrastructure is supported although it is considered that the anomalies and errors in the Landscape Study be addressed before this document is used to inform and guide the implementation of Green Infrastructure Strategy and also formulation of the specific measures for the protection and enhancement of the landscape which are to set out in the Delivery and Site Allocations DPD referred to at paragraph 7.28 of the Core Strategy. 7.1.13 It is not clear from reading the Core Strategy, how the Landscape Study has been used to inform the above policies. 7.2 Consideration of the Methodology employed in the Landscape Study 7.2.1 Wealden Council commissioned the Landscape Study from the Landscape Group at East Sussex County Council, in September 2007. It was published in February 2009. The purpose of the Study is to: 1. Inform the preparation of WDC Local Development Framework Core Strategy and; 2. Inform the development policies on landscape management and protection. 7.2.2 The Landscape Study states that it will: 1. Assess the existing landscape character of key search areas 2. Assess the quality and value of the existing landscape in these key search areas 3. Assess the sensitivity if the existing landscape and its capacity to accept change or having regard to the scope for mitigation 4. Make recommendations on preferred locations from a landscape perspective. 7.2.3 The Landscape Study purports to use a number of methodologies for the assessment and
identifies these as being: 1. For Landscape Character/Quality and Value - Design Manual for Roads and Bridges Vol 11, section 3, Part 5 (DT) which has been further refined by the Landscape Character Assessment Guidance for England and Scotland (CA/SNH 2002) and; 2. For landscape sensitivity – Landscape Character Assessment Guidance for England and Scotland, Topic Paper No.6: Techniques and criteria for Judging Capacity and Sensitivity (CA 2002). 7.2.4 The Landscape Study sets out, in section 2.0, the methodology and criteria used for each aspect of the landscape being assessed, including the following: 1. Landscape Quality (this should be ‘condition’ if following latest LCA guidance as the term quality is now a discredited approach to assessing landscapes) 2. Landscape Value 3. Landscape Sensitivity 4. Visual Sensitivity 5. Landscape Capacity 7.2.5 In relation to the assessment of landscape capacity, capacity is defined in Topic Paper No.6: ‘Techniques and Criteria for Judging Capacity and Sensitivity’ as: ‘The degree to which a particular landscape type or area is able to accommodate change without significant effect on its character, or overall change of landscape character type. Capacity is likely to vary according to the type and nature of change being proposed’. 7.2.6 We have reviewed the Landscape Study, in particular, the methodology set out in the document and whether this has been consistently applied to form a credible evidence base suitable to inform the spatial strategy contained in the Core Strategy. 7.2.7 The review of the Core Strategy background paper indicates that the Landscape Study has not followed the guidance in Topic Paper No.6. Topic Paper No.6 suggests that there are two approaches to assessing landscape sensitivity. These are: 1. Judging Overall Landscape Sensitivity and; 2. Judging Landscape Sensitivity to a specific type of change. 7.2.8 However, in order to assess landscape capacity, the assessment of the sensitivity of different types or areas of landscape to the type of change in question must be combined with an assessment of the more subjective or perceptual aspects of the landscape and of the value attached to the landscape. 7.2.9 The stages for assessing landscape capacity of a landscape are set out in Section 3.0 of Topic Paper No.6 and reproduced in Figure 7.1 below. Figure 7.1: Stages for assessing landscape capacity Source: Landscape Character Assessment Guidance for England and Scotland, Topic Paper No.6: Techniques and criteria for Judging Capacity and Sensitivity (CA 2002) 7.2.10 Sections 5.0 and 6.0 of Topic Paper No.6 provide the more detailed considerations that need to be taken into account. 7.2.11 The boxed text, at paragraph 2.11.2 of the Landscape Study, follows the same assessment stages used to assess the landscape capacity to accommodate a specific type of change and given the local scale of the assessment work it is considered that this is the appropriate method to use. 7.2.12 However, Topic Paper No.6, at paragraph 6.5, also goes on to state that: ‘Capacity is all a question of the interaction between the sensitivity of the landscape, the type and amount of change and the way that the landscape is valued’. 7.2.13 Sections 2.11 and 2.12 of the Landscape Study set out the approach used by East Sussex County Council landscape group in undertaking the landscape study. However, the assessment does not define the quantum of housing development used to assess the capacity of each character area, nor is the LDF Core Issues and Options Consultation Paper July 2007 referred to as a guide to the quantum of housing development used to assess each of the different character areas. The Landscape Study does however state at paragraph 2.12.3 that: ‘an overall assessment can be made for each character area on the capacity to accept the type of change being considered. This judgement is made according to the combination of characteristics that contribute to a particular area of landscape. The capacity of an area to accept change is related to the potential of the area to accommodate development in a particular location without detracting from the overall character of that landscape. The capacity evaluation of each character area does not assume that this is the capacity across the entire character area' 7.2.14 There are a number interrelated issues raised in the above paragraph which we now turn to. 7.2.15 In relation to the type of change, the Landscape Study defines, at paragraph 2.12.6, the assumptions used for the assessment business uses, i.e. the assessment of sensitivity / capacity is based on light industrial type uses which would be consistent with a residential environment and these would be single storey units. However the Landscape Study does not define the full details of the housing use, such as type (housing - single storey / two storey / three storey etc) or amount (large / medium / small scale development) and we contend that the details of the change being considered is not transparent from the Landscape Study, as although the type of change (i.e. housing) is known, the form and amount of housing is unknown. These are important factors when considering the landscape capacity of an area to accommodate development, especially if using the stages set in the Landscape Study. 7.2.16 A similar assumption to the business use (or range of assumptions) could have been used for assessing the impact on housing on landscape sensitivity / capacity of each character area. For example two to three storey houses at the following ranges: 1. small scale housing between five to 50 dwellings 2. medium scale housing development between 50 to 200 dwellings, and 3. large scale housing development between 200 to 500 dwellings. 7.2.17 In relation to the combination of the characteristics that contribute to a particular area, comments on these are made in later sections (See paragraphs 7.4.1 to 7.4.14 below). 7.2.18 The Landscape Study also refers to mitigation and management of the landscape (Section 2.13) and, in paragraph 2.13.1, it highlights that mitigation has been used to determine the visual and character sensitivity of the landscape. This approach does not accord with Topic Paper No.6 as mitigation should only be used to inform the visual sensitivity of the area assessed, (See Figure 7.1 above), and not directly the character sensitivity of an area (although visual aspects are one of the aspects that inform the character of an area). Mitigation in itself can have a significant effect on character and the landscapes capacity to accommodate development. In some cases mitigation would make an area less suitable to accommodate development not more suitable. Again this, we would contend, is a flaw in the assessment. The existing management of the landscape is relevant to determining the condition (or quality) of an area of landscape but the identification of management opportunities is not relevant to determining the capacity of the landscape to
accommodate development. Management of the land could in itself bring about a change to the landscape which is discordant with its character, for instance managing the land to encourage woodland growth or planting extensive woodlands in a very open exposed landscape would lead to a significant change. 7.2.19 The methodology section of the Landscape Study also includes a part dealing with the Areas of Outstanding Natural Beauty (AONB) within the district. Section 2.14 refers to ‘AONBs and AONB Buffer Zones’ as a way of identifying higher value landscapes within Wealden. At paragraph 2.14.2 the Landscape Study states: ‘There is, in some areas adjacent to the AONB boundary a buffer zone to the AONB landscape. This is usually an area of similar character but not of the same quality as the AONB landscape and not covered by the same planning policy. Where relevant these areas are indicated in the figures’. 7.2.20 Paragraph 2.14.4, the Landscape Study goes on the state the following: ‘These buffer zones have been identified through the character area analysis. The relative sensitivity of these areas has been considered according to the landscape character to achieve a balanced comparison with AONB and AONB landscapes’. 7.2.21 The Landscape Study considers that there is support for this ‘buffer zone’ approach due to Policy EN2 (f) of the East Sussex and Brighton and Hove Structure Plan. We contend that this approach is flawed and unsound. Firstly, the Structure Plan has been superseded by the South East Plan and at the time of preparing the Landscape Study during the period August 2007 to February 2009, both East Sussex County Council and Wealden District Council would have been aware of the emerging South East Plan policies through the draft regional plan. Secondly, Policy EN2 (f) does not prohibit development but seeks to protect the Sussex Downs and High Weald AONBs and minimise the impact of development within them by requiring measures to integrate the development into the landscape. Thirdly, there is no Government policy support for the concept of ‘AONB buffers’ in Planning Policy Statement No.7. Like Policy EN2 of the Structure Plan, PPS 7 does not prohibit development within the boundaries or adjoining an AONB but merely seeks to ensure that the landscapes within AONBs are considered carefully and appropriate measures taken to mitigate the harm that potential development may cause. 7.2.22 The fourth point is that, whilst the Council would seek support from Policy EN2 (f) as a way of ‘balancing the comparison between AONB and non AONB areas’ especially the areas of landscape close to the AONB boundary, the East Sussex and Brighton and Hove Structure Plan does not define the extent of the buffer zone on the Key Diagram nor is the extent of the buffer area set out in its explanatory text. We contend that the justification for this approach must be given very little weight. 7.2.23 Lastly, it is acknowledged that some areas of landscape within an AONB may be of poorer condition (quality) score and/or lower visual and character sensitivity than areas outside of the AONB but the adjustment in the landscape sensitivity/capacity scoring by introducing what appears to be an arbitrary AONB buffer zone seems to undermine the purposes and status of the AONB designation, (and its planning policy protection), by attaching increased value to a character area that adjoins the AONB which although it may be of a similar character, does not meet the quality criteria for inclusion within the AONB. In addition, it is noted that the Landscape Study has not been subject to peer review and there is no evidence that it has had stakeholder input/consultation with statutory consultees, such Natural England / High Weald AONB Joint Advisory Committee and other interested bodies to agree this approach to the AONBs. 7.2.24 The Study goes on to set out the method used to undertake a comparative evaluation of a potential development area within a character area which has capacity to accommodate development. This gives an early indication of sites which would be worthy of further consideration for development in landscape terms. We contend that the comparative assessment of character areas within the District is flawed as the starting point for the assessment the landscape sensitivity/capacity analysis is unsound for the reason given above. 7.2.25 Notwithstanding the above point, Section 2.15.4 of the Landscape Study states that: ‘Prior to coming to a firm view on the full potential and scope in these areas further investigation would be required’. 7.2.26 However, the Study does not present evidence of this further investigation or how preferred development areas have been chosen; for example there is no detailed assessment of the west of Uckfield area although this has been identified as a major urban extension area under Policy WCS4 - SD1. 7.3 Critical Review of the findings of the Landscape Study 7.3.1 The Landscape Study methodology sets out how each landscape character is to be assessed and the information recorded using landscape character assessment sheets (section 2.5) whilst section 2.17 of the Landscape Study refers to mapping which is split into two stages. Stage 1 relates to recording baseline information on each character area such as planning designation, Public Right of Way and key viewpoint, focal point, landscape features and detractors (which should be read with the assessment record sheets). Stage 2 relates to the identification of potential development areas with indicative boundaries and also identifies key woods, shaws, hedges, tree belts etc and also the potential for mitigation planting. 7.3.2 In order to assess the robustness of the landscape capacity study for the purpose of this representation, the area around Uckfield, Maresfield and Five Ash Down were visited and the baseline information recorded on the landscape assessment sheets checked and the judgements reached reviewed. This check revealed that that were a number of elements/features not recorded or identified for some areas and therefore these factors were not able to inform the judgement reached. 7.3.3 For example, ‘Maresfield Area A’, is described as: ‘An open, undulating landscape used for pasture to the west and pleasure to the east. It is ungrazed showing some scrub. Wide long views to the south. Surrounded on other sides by mature trees and exotic Eucalyptus and Cedars from nearby Park. Fine houses on outskirts and within site. Fine clumps of Pines. Some road noise adjoins picturesque recreation ground’. 7.3.4 The assessment sheet omits a number of important features such as areas of woodlands and plantations, (some of which are ancient woodlands and provide screening, containment and form visual barriers). Hedges, fences, footpaths and reference to the bypass were not recorded. The assessment sheet also refers to parkland and that the majority of the land is amenity land lacking management. A wide long view(s) out to
the south is highlighted as a key feature which is correct when looking south from a small part of the area but elsewhere views are contained and obscured by landform and vegetation. The record sheet includes a photograph of the view south but this is not taken from the recreation ground as recorded on the map Figure 52. The photograph was taken from private land on the footpath. 7.3.5 In the visual appraisal section of the assessment sheet it records the local receptors as amenity land and houses, types of view as long views from top of ridge to the south and visual barriers as landform / trees and hedges. It concludes that the sensitivity is high (see table 7.1 below). It is acknowledged that there are views within the area but these tend to be short partial or glimpsed views with long views out towards the south from high ground in the north eastern parts of character area. Views into the area are very limited and development within the area would have a minimal impact on views. However, in views from the ridge to the south the recreation occupying the north eastern parts of the character area is seen whilst the remaining areas are hidden from view and therefore the visual sensitivity of the majority of the area is low. 7.3.6 The resultant evaluation of this area was considered as follows: Table 7.1: Landscape Study Assessment, Maresfield Area A Character Area Maresfield A Quality Good Value Medium Sensitivity to Change Moderate Visual Sensitivity High Management Opportunities Mange hedges and grazing. Mange recreational spaces and access to countryside. Need to retain gap between Maresfield and Uckfield. Potential for Mitigation LowPlanting would change open character and obscure long views out from recreation ground Capacity to Accept Change: Housing LowClose to village edge only Capacity to Accept Change: Business Low 7.3.7 We contend that the record sheets are incorrect and the judgement on quality / condition is erroneous and should be ‘ordinary’ as most of the land is unmanaged comprising rank grassland of little intrinsic landscape value and the visual sensitivity of the area is ‘moderate or low’ due to the strong enclosure afforded to the area. It is interesting to note that one of the management opportunities is to retain a gap between Maresfield and Uckfield although there is no planning policy support for the retention of gaps in the Core Strategy or previous Non Statutory Wealden Local Plan. 7.3.8 By comparison, another example is Character Area L – land to the west of Uckfield, which is described as: ‘Land sloping away from urban edge to Uck valley and A26 Uckfield by pass. Strong field structure with arable and pasture. Some large fields. Sewage works detractors. Few focuses of character. Development would need a well defined edge to prevent creep’. 7.3.9 The assessment sheet for this character area has recorded the land cover and landscape elements correctly but has not recorded any landform features and relatively few aesthetic factors, although it describes the land as sloping away from the urban edge with a strong field structure with arable and pasture. The landscape condition is considered to be fair which is not defined in the methodology although this changes to ordinary in the comparison table. 7.3.10 In the visual appraisal section of the assessment sheet it records the local receptors as countryside on the other side of Uck Valley, isolated properties, footpaths and A26 and houses on the urban edge, types of view as views across to woods at West Park / Butchers Wood, wooded ridge of Shortbridge across Uckfield Valley and visual barriers as few. It concludes that the sensitivity is ‘moderate’ (see table 7.2). Table 7.2: Landscape Study Assessment, Uckfield Area L Character Area Uckfield L Quality Ordinary Value Medium NasAble for recreation Sensitivity to Change Moderate Visual Sensitivity Moderate High on ridge Management Opportunities Mange urban fringe.Farm diversification pressure. Manage wood and existing trees and hedges. Potential for Mitigation Moderate LowPlanting on ridge as need to retain open fields. Soften urban edge. Create green network. Relocate recreation ground. Capacity to Accept Change: Housing Moderate Need well defined boundaries close to urban edge avoid high ground Capacity to Accept Change: Business No capacity 7.3.11 We contend that the record sheets are incorrect and the judgement on quality / condition is under estimated and should be ‘good’ as most of the land is attractive farmed landscape with some distinctiveness features with a recognisable landscape structure. The assessment sheet ignores the open exposed nature of this character area, with long views south and west and numerous views in to the area from the surrounding countryside (roads and footpaths), and therefore the visual sensitivity of the area should be ‘high’ due the number of viewpoints where views can be obtained. This can be compared to the Maresfield A area which is considered to have ‘high’ sensitivity rating but with a few vantage points available where development impacts will be perceived. 7.3.12 We also note that under management opportunities it is considered that the area could contribute to managing the urban fringe, which could equally apply to the land at Maresfield, and that under the potential for mitigation heading is considered that the area has a ‘moderate’ ability, although the introduction of mitigate planting as shown Figure 11 of the landscape Study would dramatically and significantly change the landscape character of the area. 7.3.13 These examples illustrate the inconsistency of the landscape assessment record sheet and the arbitrary nature of the judgements made. It does not give any confidence to the manner in which the Landscape Study has been undertaken or to the transparent way that the judgements have been reached. 7.4 Implications for the soundness of the Core Strategy 7.4.1 We have reviewed the ‘Landscape Character Assessment and Development Option Evaluation Study’ of the district. It is not clear how this Landscape Study has been used to inform the spatial strategy as it is not specifically referred to in the Core Strategy, nor is the Landscape Study listed as a background paper at paragraph 1.7 of the Core Strategy (although it is included as a background paper on the Councils website). 7.4.2 We have reviewed the methodology set out in the document and we have also reviewed whether the methodology has been consistently applied resulting in a final report that is robust, thorough, and transparent and that it would form a credible evidence base suitable to inform the spatial strategy contained in the Core Strategy. The Study also includes a methodology employed to undertake a comparative evaluation of a potential development area within a character area which has capacity to accommodate development. 7.4.3 The examples referred to in our analysis above illustrate the inconsistency of the landscape assessment record sheets and arbitrary nature of the judgements made and it does not give any confidence to the manner in which the
Landscape Study has been undertaken or to the transparent way that the judgements have been reached. 7.4.4 We contend that the Landscape Study is flawed and therefore the assessment of housing sites in the district, the spatial strategy and the Councils Sustainability Appraisal is unsound. In addition, in relation to the comparison assessment of sites within the district surrounding the towns and villages; we contend that this comparative assessment of character areas is flawed as the starting point for the assessment the landscape sensitivity / capacity analysis is unsound for the reason given above. 7.4.5 The Core Strategy proposes that the land to the west of Uckfield be identified as a ‘strategic development area’ suitable for accommodating 1,000 homes and some 12,650 sq metres net of employment floor space and education provision as an extension to the urban area to the west of New Town. In the light of the comments made on the Landscape Study, it is considered that this proposal be reassessed and, (taking into account the other representations made on other parts and policies contained in the Core Strategy), greater emphasis be given to the suitability of land at Maresfield to accommodate increased housing numbers and a larger proportion of the housing requirements for the district. 7.4.6 Policy WSC13 relating to Green Infrastructure is supported although it is considered that the anomalies and errors in the Landscape Study be addressed before this document is used to inform and guide the implementation of Green Infrastructure Strategy and also formulation of the specific measures for the protection and enhancement of the landscape which are to set out in the Delivery and Site Allocations DPD referred to at paragraph 7.28 of the Core Strategy.

Details of Changes to be Made:

SUMMARY 7.4.7 In conclusion, we contend that the Core Strategy is unsound because: 1. It is not justified as it is not based on a sound evidence base as the Landscape Study (Landscape Character Assessment and Development Options Evaluation Study of the District) is flawed and therefore the assessment of housing sites in the district, the spatial strategy and the Councils Sustainability Appraisal is unsound. It is not clear how the Landscape Study has been used to inform the spatial strategy as it is not specifically referred to in the Core Strategy nor is the Landscape Study listed as a background paper at paragraph 1.7 of the Core Strategy; 2. It is not justified because the Landscape Study as it is not robust, thorough, and transparent and that it does not form a credible evidence base suitable to inform the spatial strategy contained in the Core Strategy. The Landscape Study contains a number inconsistencies set out in the landscape assessment record sheets and contains a number of arbitrary judgements and so it does not give any confidence to the manner in which the Landscape Study has been undertaken or to the transparent way that the judgements have been reached 3. It is not consistent with national policy as the methodology for undertaking the Landscape Study (which has been used to inform the spatial strategy) refers to ‘AONB and AONB Buffer Zones’ as a way of identifying higher value landscapes. There are a number of reasons why this approach is unsound but there is no Government policy support for the concept of ‘AONB buffers’ in Planning Policy Statement No.7 or any other policy guidance.
Many of the aims set out for Uckfield seem to be contradictory, as well seemingly to be undeliverable or the chosen land is unavailable. As set out there are congestion problems in the town centre and the Framfield Road junction. Proposals to deal with this have been mooted for the last 5 to 7 years though no detail or costings have yet been produced. The only consultation some years ago only really amounted to a scheme to promoted by Tesco’s to meet their aim for a larger supermarket. This traffic proposal appears to involve a gyratory scheme though again no great details has ever been produced, and it appears to have major problems due to the various landowners not agreeing to join in. However whatever the scheme may be, it may cope with the current traffic levels but it would seem will be totally negated by the proposed additional housing, retail and employment development. It is proposed to allow much larger supermarket space in the town centre plus an additional unspecified number of houses. Additionally the proposed SD1 allocation with no identified access at the moment can only realistically come out on the New town Road, since it would seem unlikely that the access to a large housing estate can go through the Bellbrook Industrial Estate. Thus all this extra development will immediately need to use any modified road scheme and just end up causing as much congestion if not more, as the current road system has, thus totally negating any road improvements. This is without even considering the negative effect of the council’s choice of limiting village growth, which will continue the decline of villages and their services, particularly local shops. Thus as all the supermarket space for the area is proposed to be in Uckfield Town centre even more rural dwellers will need to access this area as their local services die out adding even further to the congestion problem.

The council are reyling on the new houses to fund the town centre redevelopment, yet do not appear to have produced any figures to show how this will happen, or whether 1000 houses are too many or not enough. Similarly generally recent new housing has been looked on as the milk cow to provide everything to do with infrastructure and local services, yet the council do not either seem to have considered whether the funds they require per new house will make SD1 non viable to housing developers, at this time of national economic problems and falling house prices. The objectors have been involved in making submissions to local planning for 25 years. It appears to the objectors that WDC are totally incapable of dealing with any matters properly, and usually take 5 years to do what should be done in 1 year. Thus in this case it is only 4 years before the town centre plan and housing allocation should be started. Yet the proposals at the moment seem to be just a wish list of hopes with nothing behind them. What is the likelihood that a town scheme will be detailed and agreed with all, planning permission granted, S106's matters detailed and agree, early infrastructure agreed, planning granted and it put in place, site DS1 sorted out, especially the access and planning and S106 matters sorted, so work on all this can start by 2016???? the answer is virtually nil as 4 years to far too short with all the parties and complications involved, plus it is likely to be another 2 years before and LDF is in place at best. The other main problem is that the land for SD1 does not appear to be available. The objectors are acquainted with the owners of the land, Ridgewood Farm who told the objectors only in recent months that they have been fighting development of 40 years an don't want it on their land. So unless this has changed since, it would appear this land is unavailable for the development proposed. Presumably the council adde the site to the SHLAA themselves, and not the landowners. This allocation again shows how the council have incorrectly used the SHLAA, since only land that is available and deliverable should be considered for allocation. Not only does the land appear unavailable, but since the council have no idea where the access would be it, though 2 would be needed for such a large estate, it would appear undeliverable for this reason as well, so should not have been considered. It should also be noted that the towns sewage works is sited here, which would impact badly on any new housing or employment areas here, particularly as it would presumably need to be enlarged. Equally it would hardly be a nice green area to walk around either where the area near it to be POS. This site would also seem to be contrary to the council’s and national policy on landscape effect as it is on the highest ground for miles and is very open to short and long views. Many other sites in the SHLAA have been rejected for much less landscape effect than this. The plan on fig 6 shows 2 areas of green infrastructure potential. However the one next to the Bellbrook estate is a thin strip between the link road and existing housing mainly consisting of a tree covered noise bund, so it is difficult to see what extra could be done here. The area to the south goes off of the SD1 site into land in other ownership, and even were SD1 to ever happen, it is hard to see why other landowners would add their land in without considerable financial incentives which are not usually available for separate potential green land. Thus all in all the proposals in this area seem completely unsound and contrary to normal planning policy.
Details of Changes to be Made:

Site SD1 should be removed as it is undeliverable and unavailable. Some of the allocation can be moved to Maresfield as detailed in other objections, due to the adjacent Ashdown Business Park. Some of the allocation can go to deliverable and available sites around Uckfield, where they won't impact so greatly on the town centre traffic. Some can also go to the extra village allocations as set out in objections to WCS6.

Representation ID
385

Person ID  Mr Eddison
521943 Batcheller Monkhouse

Agent ID  Mr Ide
335759 Batcheller Monkhouse

Paragraph 6.1

Sound ☐ Yes ☑ No ☑ Justified ☐ Effective ☐ Consistent with national policy

Legally Compliant ☑ Yes ☐ No

Details of Reasons for Soundess/ Legal Complaince:

The identification of urban extensions is supported in principle. The policy identifies 12 Strategic Development Areas, all of which vary considerably in character. Not all of proposed Strategic Development Area SD1 (Uckfield) is suitable for development. Uckfield is identified as having a key role in assisting with the delivery of the Core Strategy up to 2030: the strategy for Uckfield specifically is to enhance the role of the town as a District Level Centre, serving the local community and surrounding area. Para 6.11(3) states inter alia that the identification of SD1 as an allocation is subject to the provision of suitable access and a number of other factors, with these to be addressed in subsequent DPDs, and which may increase the risk to delivery. The Core Strategy recognises that if development has not started at West Uckfield by 2016, a review in relation to Uckfield will be required. Whether development has started by 2016 is one issue. Others are: i.Whether it is genuinely appropriate for development to take place over the whole allocation as indicated in the key diagram. The Sustainability Appraisal of the Proposed Submission Core Strategy, Background Papers, February 2011, recognises this issue by stating “potential landscape issues as the area is on high ground” (p.217). i.The uncertainty regarding what further studies may reveal about the practical ability of the site to accommodate development. If development has not commenced before 2016, the Council should know before then whether a review of the Core Strategy is required; why should the Core Strategy limit the potential scope of any review to the Uckfield area (Para 6.11)? SD1 is supported to the extent that it relates well to the strategic highway network. The impact of residential and other development upon SD1 will however be too prominent and intrusive along this part of the A22 corridor. Much of the development will not be easily capable of being screened. The southern part of SD1 is most exposed. It is recommended that the most sensitive landscape is retained in SD1 as open space and, as a consequence, that SD1 be extended to the south of Lewes Road to include Horsted Pond Farm and Ridgewood House – any development here could be better accommodated within the landscape. SD1, as presently drawn, is too narrowly defined in extent – the inclusion of Horsted Pond Farm and Ridgewood House within it would provide the Plan with flexibility in delivering new development to the west of Uckfield. Proposed Change

Details of Changes to be Made:

It is proposed that the SD1 allocation be extended to include Horsted Pond Farm (in part of in whole) and Ridgewood House, with consequential changes made to the Core Strategy and Key Diagram.
Representation ID
457

Person ID  Mr Phillips
104870  Campaign for Better Transport

Paragraph  6.1

Sound  ☐ Yes  ☑ No  ☐ Justified  ☑ Effective  ☐ Consistent with national policy

Legally Compliant  ☑ Yes  ☐ No

Details of Reasons for Soundness/ Legal Compliance:
Policies to restrain traffic, obtain modal shift in travel, reducing need to travel and improve the experience of non-car travel need to be sharpened and focused. Aspirations for these to happen must have necessary circumstances incorporated into the policies.

Details of Changes to be Made:
Demand management techniques for traffic in Hailsham (6.15) should be included in all the related and equivalent policies. There should be a definite commitment to traffic reduction measures and targets throughout the Strategy Plan document.
In this section of the report we present our representations in regard to landscape matters in and informing the Core Strategy. Our representation is made in regard to paragraphs 3.30 – 3.33 of the submission Core Strategy, Policies WC4 and WC13 and supporting background papers. 7.1.2 For the purposes of this representation we have reviewed the ‘Landscape Character Assessment and Development Option Evaluation Study’ undertaken for the district (referred hereinafter as the ‘Landscape Study’), which is included as a background paper to the Core Strategy on the Councils website. However, it is not clear how the Landscape Study has been used to inform the spatial strategy as it is not specifically referred to in the text of Core Strategy nor is the Landscape Study listed as a background paper at paragraph 1.7 of the Core Strategy (although it is included as a background paper on the Councils website). 7.1.3 We have reviewed the methodology set out in the document and we have also reviewed whether the methodology has been consistently applied resulting in a final report that is robust, thorough and transparent and one that would form a credible evidence base suitable to inform the spatial strategy contained in the Core Strategy. 7.1.4 We contend that the Landscape Study is flawed and therefore the assessment of housing sites in the district, the spatial strategy and the Councils Sustainability Appraisal, and thus the Core Strategy, is unsound. 7.1.5 Our representation is summarised below: Section of Core Strategy: Spatial Planning Objectives 1, 3 and 11, Paras 3.30 - 3.33, Policy WCS4 Strategic Development Areas, Figure 6 Uckfield Area Strategy, Paras 6.9 and 6.11, Policy WSC13 Green Infrastructure, Paras 7.23 - 7.28Legally Compliant: -Sound: NoJustified: NoEffective: -Consistent with national policy: No Proposed Submission Core Strategy Paragraphs 3.30 – 3.33 7.1.6 Paragraph 3.30 of the Proposed Submission Core Strategy refers to Wealden’s environmental attributes and that they have an important part to play in the development of the spatial strategy and ‘had a significant impact upon the assessment of the suitability of housing land in relation to the SHLAA’. 7.1.7 Paragraph 3.30 goes on to state that: ‘...and sites have been carefully scrutinised with regards to landscape impact.” 7.1.8 Paragraph 3.33 refers to Government guidance and the level of protection this provides for the environment, particularly nationally and internationally designated sites, which are not duplicated in the Core Strategy. The paragraph goes on to state: “However, our strategy has been guided by high levels of protection on local and national levels, and more detailed policies are contained within the Core Strategy and further ones in subsequent DPDs.” 7.1.9 Paragraph 1.7 in the Introduction to the Core Strategy refers to a number of specialist studies that have been produced to provide a robust evidence base to inform the Local Development Framework. The Landscape Study is not listed as a background paper at paragraph 1.7 of the Core Strategy (although it is included as a background paper on the Councils website). Policy WCS4 Strategic Development Areas and Paragraphs 6.9 and 6.11 7.1.10 The Core Strategy proposes that the land to the west of Uckfield be identified as a ‘strategic development area’ suitable for accommodating 1,000 homes and some 12,650 sq metres of employment floor space and education provision as an extension to the urban area to the west of New Town. Paragraph 6.9 refers to the SHLAA and assessment of the potential sites at the fringes of the urban area. 7.1.11 In the light of the comments that follow in this section of our representations on the Landscape Study, it considered that this proposal be reassessed and, taking into account other representations made on other parts and policies contained in the Core Strategy, greater emphasis should be given to the suitability of land at Maresfield to accommodate increased housing numbers and a larger proportion of the housing requirements for the district. Policy WSC13 Green Infrastructure, Paragraphs 7.23 - 7.28 and Background Paper BP6 7.1.12 Policy WSC13 and paragraph 7.23 to 7.28 relating to Green Infrastructure is supported although it is considered that the anomalies and errors in the Landscape Study be addressed before this document is used to inform and guide the implementation of Green Infrastructure Strategy and also formulation of the specific measures for the protection and enhancement of the landscape which are to set out in the Delivery and Site Allocations DPD referred to at paragraph 7.28 of the Core Strategy. 7.1.13 It is not clear from reading the Core Strategy, how the Landscape Study has been used to inform the above policies. 7.2 Consideration of the Methodology employed in the Landscape Study 7.2.1 Wealden Council commissioned the Landscape Study from the Landscape Group at East Sussex County Council, in September 2007. It was published in February 2009. The purpose of the Study is to: 1. Inform the preparation of WDC Local Development Framework Core Strategy and; 2. Inform the development policies on landscape management and protection. 7.2.2 The Landscape Study states that it will: 1. Assess the existing landscape character of key search areas 2. Assess the quality and value of the existing landscape in these key search areas 3. Assess the sensitivity if the existing landscape and its capacity to accept change or having regard to the scope for mitigation 4. Make recommendations on preferred locations from a landscape perspective. 7.2.3 The Landscape Study purports to use a number of methodologies for the assessment and
identifies these as being: 1. For Landscape Character/ Quality and Value - Design Manual for Roads and Bridges Vol 11, section 3, Part 5 (DT) which has been further refined by the Landscape Character Assessment Guidance for England and Scotland (CA/SNH 2002) and; 2. For landscape sensitivity – Landscape Character Assessment Guidance for England and Scotland, Topic Paper No.6: Techniques and criteria for Judging Capacity and Sensitivity (CA 2002). 7.2.4 The Landscape Study sets out, in section 2.0, the methodology and criteria used for each aspect of the landscape being assessed, including the following: 1. Landscape Quality (this should be ‘condition’ if following latest LCA guidance as the term quality is now a discredited approach to assessing landscapes) 2. Landscape Value 3. Landscape Sensitivity 4. Visual Sensitivity 5. Landscape Capacity 7.2.5 In relation to the assessment of landscape capacity, capacity is defined in Topic Paper No.6: ‘Techniques and Criteria for Judging Capacity and Sensitivity’ as: ‘The degree to which a particular landscape type or area is able to accommodate change without significant effect on its character, or overall change of landscape character type. Capacity is likely to vary according to the type and nature of change being proposed’. 7.2.6 We have reviewed the Landscape Study, in particular, the methodology set out in the document and whether this has been consistently applied to form a credible evidence base suitable to inform the spatial strategy contained in the Core Strategy. 7.2.7 The review of the Core Strategy background paper indicates that the Landscape Study has not followed the guidance in Topic Paper No.6. Topic Paper No.6 suggests that there are two approaches to assessing landscape sensitivity. These are: 1. Judging Overall Landscape Sensitivity and; 2. Judging Landscape Sensitivity to a specific type of change. 7.2.8 However, in order to assess landscape capacity, the assessment of the sensitivity of different types or areas of landscape to the type of change in question must be combined with an assessment of the more subjective or perceptual aspects of the landscape and of the value attached to the landscape. 7.2.9 The stages for assessing landscape capacity of a landscape are set out in Section 3.0 of Topic Paper No.6 and reproduced in Figure 7.1 below. Figure 7.1: Stages for assessing landscape capacity Source: Landscape Character Assessment Guidance for England and Scotland, Topic Paper No.6: Techniques and criteria for Judging Capacity and Sensitivity (CA 2002) 7.2.10 Sections 5.0 and 6.0 of Topic Paper No.6 provide the more detailed considerations that need to be taken into account. 7.2.11 The boxed text, at paragraph 2.11.2 of the Landscape Study, follows the same assessment stages used to assess the landscape capacity to accommodate a specific type of change and given the local scale of the assessment work it is considered that this is the appropriate method to use. 7.2.12 However, Topic Paper No.6, at paragraph 6.5, also goes on to state that: ‘Capacity is all a question of the interaction between the sensitivity of the landscape, the type and amount of change and the way that the landscape is valued’. 7.2.13 Sections 2.11 and 2.12 of the Landscape Study set out the approach used by East Sussex County Council landscape group in undertaking the landscape study. However, the assessment does not define the quantum of housing development used to assess the capacity of each character area, nor is the LDF Core Issues and Options Consultation Paper July 2007 referred to as a guide to the quantum of housing development used to assess each of the different character areas. The Landscape Study does however state at paragraph 2.12.3 that: ‘an overall assessment can be made for each character area on the capacity to accept the type of change being considered. This judgement is made according to the combination of characteristics that contribute to a particular area of landscape. The capacity of an area to accept change is related to the potential of the area to accommodate development in a particular location without detracting from the overall character of that landscape. The capacity evaluation of each character area does not assume that this is the capacity across the entire character area’. 7.2.14 There are a number interrelated issues raised in the above paragraph which we now turn to. 7.2.15 In relation to the type of change, the Landscape Study defines, at paragraph 2.12.6, the assumptions used for the assessment business uses, i.e. the assessment of sensitivity / capacity is based on light industrial type uses which would be consistent with a residential environment and these would be single storey units. However the Landscape Study does not define the full details of the housing use, such as type (housing - single storey / two storey / three storey etc) or amount (large / medium / small scale development) and we contend that the details of the change being considered is not transparent from the Landscape Study, as although the type of change (i.e. housing) is known, the form and amount of housing is unknown. These are important factors when considering the landscape capacity of an area to accommodate development, especially if using the stages set in the Landscape Study. 7.2.16 A similar assumption to the business use (or range of assumptions) could have been used for assessing the impact on housing on landscape sensitivity / capacity of each character area. For example two to three storey houses at the following ranges: 1. small scale housing between five to 50 dwellings 2. medium scale housing development between 50 to 200 dwellings, and 3. large scale housing development between 200 to 500 dwellings. 7.2.17 In relation to the combination of the characteristics that contribute to a particular area, comments on these are made in later sections (See paragraphs 7.4.1 to 7.4.14 below). 7.2.18 The Landscape Study also refers to mitigation and management of the landscape (Section 2.13) and, in paragraph 2.13.1, it highlights that mitigation has been used to determine the visual and character sensitivity of the landscape. This approach does not accord with Topic Paper No.6 as mitigation should only be used to inform the visual sensitivity of the area assessed, (See Figure 7.1 above), and not directly the character sensitivity of an area (although visual aspects are one of the aspects that inform the character of an area). Mitigation in itself can have a significant effect on character and the landscapes capacity to accommodate development. In some cases mitigation would make an area less suitable to accommodate development not more suitable. Again this, we would contend, is a flaw in the assessment. The existing management of the landscape is relevant to determining the condition (or quality) of an area of landscape but the identification of management opportunities is not relevant to determining the capacity of the landscape to
accommodate development. Management of the land could in itself bring about a change to the landscape which is discordant with its character, for instance managing the land to encourage woodland growth or planting extensive woodlands in a very open exposed landscape would lead to a significant change. 7.2.19 The methodology section of the Landscape Study also includes a part dealing with the Areas of Outstanding Natural Beauty (AONB) within the district. Section 2.14 refers to ‘AONBs and AONB Buffer Zones’ as a way of identifying higher value landscapes within Wealden. At paragraph 2.14.2 the Landscape Study states: ‘There is, in some areas adjacent to the AONB boundary a buffer zone to the AONB landscape. This is usually an area of similar character but not of the same quality as the AONB landscape and not covered by the same planning policy. Where relevant these areas are indicated in the figures’. 7.2.20 Paragraph 2.14.4, the Landscape Study goes on the state the following: ‘These buffer zones have been identified through the character area analysis. The relative sensitivity of these areas has been considered according to the landscape character to achieve a balanced comparison with AONB and AONB landscapes’. 7.2.21 The Landscape Study considers that there is support for this ‘buffer zone’ approach due to Policy EN2 (f) of the East Sussex and Brighton and Hove Structure Plan. We contend that this approach is flawed and unsound. Firstly, the Structure Plan has been superseded by the emerging South East Plan and at the time of preparing the Landscape Study during the period August 2007 to February 2009, both East Sussex County Council and Wealden District Council would have been aware of the emerging South East Plan policies through the draft regional plan. Secondly, Policy EN2 (f) does not prohibit development but seeks to protect the Sussex Downs and High Weald AONBs and minimise the impact of development within them by requiring measures to integrate the development into the landscape. Thirdly, there is no Government policy support for the concept of ‘AONB buffers’ in Planning Policy Statement No.7. Like Policy EN2 of the Structure Plan, PPS 7 does not prohibit development within the boundaries or adjoining an AONB but merely seeks to ensure that the landscapes within AONBs are considered carefully and appropriate measures taken to mitigate the harm that potential development may cause. 7.2.22 The fourth point is that, whilst the Council would seek support from Policy EN2 (f) as a way of ‘balancing the comparison between AONB and non AONB areas’ especially the areas of landscape close to the AONB boundary, the East Sussex and Brighton and Hove Structure Plan does not define the extent of the buffer zone on the Key Diagram nor is the extent of the buffer area set out in its explanatory text. We contend that the justification for this approach must be given very little weight. 7.2.23 Lastly, it is acknowledged that some areas of landscape within an AONB may be of poorer condition (quality) score and / or lower visual and character sensitivity than areas outside of the AONB but the adjustment in the landscape sensitivity / capacity scoring by introducing what appears to be an arbitrary AONB buffer zone seems to undermine the purposes and status of the AONB designation,(and its planning policy protection), by attaching increased value to a character area that adjoins the AONB which although it may be of a similar character, does not meet the quality criteria for inclusion within the AONB. In addition, it is noted that the Landscape Study has not been subject to peer review and there is no evidence that it has had stakeholder input / consultation with statutory consultees, such Natural England / High Weald AONB Joint Advisory Committee and other interested bodies to agree this approach to the AONBs. 7.2.24 The Study goes on to set out the method used to undertake a comparative evaluation of a potential development area within a character area which has capacity to accommodate development. This gives an early indication of sites which would be worthy of further consideration for development in landscape terms. We contend that the comparative assessment of character areas within the District is flawed as the starting point for the assessment the landscape sensitivity / capacity analysis is unsound for the reason given above. 7.2.25 Notwithstanding the above point, Section 2.15.4 of the Landscape Study states that: ‘Prior to coming to a firm view on the full potential and scope in these areas further investigation would be required’. 7.2.26 However, the Study does not present evidence of this further investigation or how preferred development areas have been chosen; for example there is no detailed assessment of the west of Uckfield area although this has been identified as a major urban extension area under Policy WCS4 - SD1. 7.3 Critical Review of the findings of the Landscape Study 7.3.1 The Landscape Study methodology sets out how each landscape character is to be assessed and the information recorded using landscape character assessment sheets (section 2.5) whilst section 2.17 of the Landscape Study refers to mapping which is split into two stages. Stage 1 relates to recording baseline information on each character area such as planning designation, Public Right of Way and key viewpoint, focal point, landscape features and detractors (which should be read with the assessment record sheets). Stage 2 relates to the identification of potential development areas with indicative boundaries and also identifies key woods, shaws, hedges, tree belts etc and also the potential for mitigation planting. 7.3.2 In order to assess the robustness of the landscape capacity study for the purpose of this representation, the area around Uckfield, Maresfield and Five Ash Down were visited and the baseline information recorded on the landscape assessment sheets checked and the judgements reached reviewed. This check revealed that that were a number of elements / features not recorded or identified for some areas and therefore these factors were not able to inform the judgement reached. 7.3.3 For example, ‘Maresfield Area A’, is described as: ‘An open, undulating landscape used for pasture to the west and pleasure to the east. It is ungrazed showing some scrub. Wide long views to the south. Surrounded on other sides by mature trees and exotic Eucalyptus and Cedars from nearby Park. Fine houses on outskirts and within site. Fine clumps of Pines. Some road noise adjoins picturesque recreation ground’. 7.3.4 The assessment sheet omits a number of important features such as areas of woodlands and plantations, (some of which are ancient woodlands and provide screening, containment and form visual barriers). Hedges, fences, footpaths and reference to the bypass were not recorded. The assessment sheet also refers to parkland and that the majority of the land is amenity land lacking management. A wide long view(s) out to
the south is highlighted as a key feature which is correct when looking south from a small part of the area but elsewhere views are contained and obscured by landform and vegetation. The record sheet includes a photograph of the view south but this is not taken from the recreation ground as recorded on the map Figure 52. The photograph was taken from private land on the footpath. 7.3.5 In the visual appraisal section of the assessment sheet it records the local receptors as amenity land and houses, types of view as long views from top of ridge to the south and visual barriers as landform / trees and hedges. It concludes that the sensitivity is high (see table 7.1 below). It is acknowledged that there are views within the area but these tend to be short partial or glimpsed views with long views out towards the south from high ground in the north eastern parts of character area. Views into the area are very limited and development within the area would have a minimal impact on views. However, in views from the ridge to the south the recreation occupying the north eastern parts of the character area is seen whilst the remaining areas are hidden from view and therefore the visual sensitivity of the majority of the area is low. 7.3.6 The resultant evaluation of this area was considered as follows: Table 7.1: Landscape Study Assessment, Maresfield Area A Character Area Maresfield A Quality Good Value Medium Sensitivity to Change Moderate Visual Sensitivity High Management Opportunities Mange hedges and grazing. Mange recreational spaces and access to countryside. Need to retain gap between Maresfield and Uckfield. Potential for Mitigation Low Planting would change open character and obscure long views out from recreation ground Capacity to Accept Change: Housing Low Close to village edge only Capacity to Accept Change: Business Low 7.3.7 We contend that the record sheets are incorrect and the judgement on quality / condition is erroneous and should be ‘ordinary’ as most of the land is unmanaged comprising rank grassland of little intrinsic landscape value and the visual sensitivity of the area is ‘moderate or low’ due to the strong enclosure afforded to the area. It is interesting to note that one of the management opportunities is to retain a gap between Maresfield and Uckfield although there is no planning policy support for the retention of gaps in the Core Strategy or previous Non Statutory Wealden Local Plan. 7.3.8 By comparison, another example is Character Area L – land to the west of Uckfield, which is described as: ‘Land sloping away from urban edge to Uck valley and A26 Uckfield by pass. Strong field structure with arable and pasture. Some large fields. Sewage works detractors. Few focuses of character. Development would need a well defined edge to prevent creep’. 7.3.9 The assessment sheet for this character area has recorded the land cover and landscape elements correctly but has not recorded any landform features and relatively few aesthetic factors, although it describes the land as sloping away from the urban edge with a strong field structure with arable and pasture. The landscape condition is considered to be fair which is not defined in the methodology although this changes to ordinary in the comparison table. 7.3.10 In the visual appraisal section of the assessment sheet it records the local receptors as countryside on the other side of Uck Valley, isolated properties, footpaths and A26 and houses on the urban edge, types of view as views across to woods at West Park / Butchers Wood, wooded ridge of Shortbridge across Uckfield Valley and visual barriers as few. It concludes that the sensitivity is ‘moderate’ (see table 7.2). Table 7.2: Landscape Study Assessment, Uckfield Area L Character Area Uckfield L Quality Ordinary Value Medium Snaw Accessible for recreation Sensitivity to Change Moderate Visual Sensitivity Moderate High on ridge Management Opportunities Mange urban fringe. Farm diversification pressure. Manage wood and existing trees and hedges Potential for Mitigation Moderate Low on ridge as need to retain open fields Soften urban edge. Create green network. Relocate recreation ground Capacity to Accept Change: Housing Moderate Need well defined boundaries close to urban edge avoid high ground Capacity to Accept Change: Business No capacity 7.3.11 We contend that the record sheets are incorrect and the judgement on quality / condition is under estimated and should be ‘good’ as most of the land is attractive farmed landscape with some distinctiveness features with a recognisable landscape structure. The assessment sheet ignores the open exposed nature of this character area, with long views south and west and numerous views in to the area from the surrounding countryside (roads and footpaths), and therefore the visual sensitivity of the area should be ‘high’ due the number of viewpoints where views can be obtained. This can be compared to the Maresfield A area which is considered to have ‘high’ sensitivity rating but with a few vantage points available where development impacts will be perceived. 7.3.12 We also note that under management opportunities it is considered that the area could contribute to managing the urban fringe, which could equally apply to the land at Maresfield, and that under the potential for mitigation heading is considered that the area has a ‘moderate’ ability, although the introduction of mitigate planting as shown Figure 11 of the landscape Study would dramatically and significantly change the landscape character of the area. 7.3.13 These examples illustrate the inconsistency of the landscape assessment record sheet and the arbitrary nature of the judgements made. It does not give any confidence to the manner in which the Landscape Study has been undertaken or to the transparent way that the judgements have been reached. 7.4 Implications for the soundness of the Core Strategy 7.4.1 We have reviewed the ‘Landscape Character Assessment and Development Option Evaluation Study’ of the district. It is not clear how this Landscape Study has been used to inform the spatial strategy as it is not specifically referred to in the Core Strategy, nor is the Landscape Study listed as a background paper at paragraph 1.7 of the Core Strategy (although it is included as a background paper on the Councils website). 7.4.2 We have reviewed the methodology set out in the document and we have also reviewed whether the methodology has been consistently applied resulting in a final report that is robust, thorough, and transparent and that it would form a credible evidence base suitable to inform the spatial strategy contained in the Core Strategy. The Study also includes a methodology employed to undertake a comparative evaluation of a potential development area within a character area which has capacity to accommodate development. 7.4.3 The examples referred to in our analysis above illustrate the inconsistency of the landscape assessment record sheets and arbitrary nature of the judgements made and it does not give any confidence to the manner in which the

| Character Area | Uckfield Area L | Quality | High | Value | Medium | Sensitivity to Change | Moderate | Visual Sensitivity | Mange urban fringe. Farm diversification pressure. Manage wood and existing trees and hedges | Potential for Mitigation | Moderate | Low on ridge as need to retain open fields | Soften urban edge. Create green network. Relocate recreation ground. | Capacity to Accept Change: Housing Moderate | Need well defined boundaries close to urban edge avoid high ground Capacity to Accept Change: Business No capacity |
Landscape Study has been undertaken or to the transparent way that the judgements have been reached. 7.4.4 We contend that the Landscape Study is flawed and therefore the assessment of housing sites in the district, the spatial strategy and the Council's Sustainability Appraisal is unsound. In addition, in relation to the comparison assessment of sites within the district surrounding the towns and villages; we contend that this comparative assessment of character areas is flawed as the starting point for the assessment the landscape sensitivity / capacity analysis is unsound for the reason given above. 7.4.5 The Core Strategy proposes that the land to the west of Uckfield be identified as a 'strategic development area' suitable for accommodating 1,000 homes and some 12,650 sq metres net of employment floor space and education provision as an extension to the urban area to the west of New Town. In the light of the comments made on the Landscape Study, it is considered that this proposal be reassessed and, (taking into account the other representations made on other parts and policies contained in the Core Strategy), greater emphasis be given to the suitability of land at Maresfield to accommodate increased housing numbers and a larger proportion of the housing requirements for the district. 7.4.6 Policy WSC13 relating to Green Infrastructure is supported although it is considered that the anomalies and errors in the Landscape Study be addressed before this document is used to inform and guide the implementation of Green Infrastructure Strategy and also formulation of the specific measures for the protection and enhancement of the landscape which are to set out in the Delivery and Site Allocations DPD referred to at paragraph 7.28 of the Core Strategy.

Details of Changes to be Made:

SUMMARY 7.4.7 In conclusion, we contend that the Core Strategy is unsound because: 1. It is not justified as it is not based on a sound evidence base as the Landscape Study (Landscape Character Assessment and Development Options Evaluation Study of the District) is flawed and therefore the assessment of housing sites in the district, the spatial strategy and the Council's Sustainability Appraisal is unsound. It is not clear how the Landscape Study has been used to inform the spatial strategy as it is not specifically referred to in the Core Strategy nor is the Landscape Study listed as a background paper at paragraph 1.7 of the Core Strategy; 2. It is not justified because the Landscape Study as it is not robust, thorough, and transparent and that it does not form a credible evidence base suitable to inform the spatial strategy contained in the Core Strategy. The Landscape Study contains a number inconsistencies set out in the landscape assessment record sheets and contains a number of arbitrary judgements and so it does not give any confidence to the manner in which the Landscape Study has been undertaken or to the transparent way that the judgements have been reached 3. It is not consistent with national policy as the methodology for undertaking the Landscape Study (which has been used to inform the spatial strategy) refers to 'AONB and AONB Buffer Zones' as a way of identifying higher value landscapes. There are a number of reasons why this approach is unsound but there is no Government policy support for the concept of 'AONB buffers' in Planning Policy Statement No.7 or any other policy guidance.
Paragraph 6.11

Details of Reasons for Soundess/ Legal Complaince:
The identification of the urban extension of Uckfield in SD1 is not justified on the basis of research and fact finding. There are other sites which have been identified for housing under the SHLAA which are more appropriate for development first. The assessment for the area identified as SD1, under the SHLAA included references to significant infrastructure, noise and smell pollution, access and ownership issues. These are also referred to in the submission Core Strategy. Site 028/1410 known as Cysleys Farm does not have these significant issues and has been assessed as being available for housing. The site is controlled by one owner. Paragraph 33 of PPS3 sets out the still valid criteria for assessing an appropriate level of housing. This includes, amongst others, the use of SHLAA’s together with a sustainability appraisal. In addition figures contained within the RSS are still at this time, valid as a starting point for assessing the appropriate level of housing in the Wealden district. There is a significant shortfall between the RSS figures in the time frame of the Core Strategy and the figures put forward in this document. If the Core Strategy was consistent with RSS figures additional land for housebuilding would be required. The SHLAA assessments show that this additional house building could be located in the Low Weald towns and particularly on the southern sector of Uckfield. The Core Strategy sets out the phasing of development with SD1 commencing from 2016. None of the sites identified in the strategy start before 2015, however some sites can commence prior to this date including Cysleys Farm, where there is no impedence to an earlier development commencement. This area of land identified under site reference 028/1410 provides for a more logical extension to Uckfield without the issues identified within SD1 by the council themselves.

Details of Changes to be Made:
Figure 6, the Uckfield Area Strategy diagram and paragraph 6.11 should be revised to allow other land in the Uckfield area to be developed as part of the strategy to enhance the role of Uckfield as a district centre. In particular it should be made clear that the delivery and site allocations DPD will be allowed to be more flexible in deciding the precise location for development. It should not necessarily rely on the urban extension (SD1) to provide all of the necessary allocated land for housing, employment and educational provision.

Paragraph 6.11

Details of Reasons for Soundess/ Legal Complaince:
Whilst I am naturally aware of the necessity for a Core Strategy, I am somewhat perplexed and confused as to why such trouble was taken to identify my site, 287/1410 being HighTree House, Eastbourne Road, Uckfield, opposite the ongoing new development namely Cysleys Farm, in the SHLAA as suitable, available and achievable. The site is on the edge of the built up area and not in the area SD1 identified for development post 2016. Given that there is a big development opposite my site and the location of the industrial estate (Ridgewood) it appears to me that this is a logical location for short term highquality residential development. Clearly a fully policy compliant development will provide a range of housing, including affordable, and high quality amenity space. The basic infrastructure to enable this development already exists in terms of access (roundabout), water supply (the stop-cock for the Uckfield water main is situated outside my stile/gate). I also understand that it is not valuable agricultural land and I am willing to work directly with Wealden Planners in order to achieve a development of which this town would be proud. At best if permission were to be granted now then it would be some three years before houses could be occupied so should this not be granted for another five years then the whole process would be some eight away. Housing is desperately required. Mrs P Radcliffe, Land owner.

Details of Changes to be Made:
Details of Reasons for Soundness/ Legal Compliance:
I make reference to the proposed development in Ridgewood, my understanding is new housing should be on Brown Field land, not Green Field Land which is Ridgewood Farm. Its really disgraceful that Ridgewood has been thrown to the wolves, this is the 3rd Farm that will be built on plus Pipers Field and now Sandpits that was also Agricultural land. If this takes place we will lose all our lovely hedges, the wildlife, which we have plenty. This makes me so angry that all this would be lost for profit. I would like it put on record my objections, I know my neighbours all feel the same.

Details of Changes to be Made:

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Details of Reasons for Soundness/ Legal Compliance:
The exit from the proposed Ridgewood Farm (346/1410) development has not been mentioned. Out on to an already busy bypass or out on to Lewes Road which would be difficult.

Details of Changes to be Made:
Many of the aims set out for Uckfield seems to be contradictory, as well semingly to be undeliverable or the chosen land is unavailable. As set out there are congestion problems in the town centre and the Framfield Road junction. Proposals to deal with this have been mooted for the last 5 to 7 years though no detail or costings have yet been produced. The only consultation some years ago only really amounted to a scheme to promoted by Tesco’s to meet their aim for a larger supermarket. This traffic proposal appears to involve a gyratory scheme though again no great details has ever been produced, and it appears to have major problems due to the various landowners not agreeing to join in. However whatever the scheme may be, it may cope with the current traffic levels but it would seem this will be totally negated by the proposed additonal housing, retail and employment development. It is proposed to allow much larger supermarket space in the town centre plus an additional unspecified number of houses. Additionally the proposed SD1 allocation with no identified access at the moment can only realistically come out on the New town Road, since it would seem unlikely that the access to a large housing estate can go through the Bellbrook Industrial Estate. Thus all this extra development will immediately need to use any modified road scheme and just end up causing as much congestion if not more, as the current road system has, thus totally negating any road improvements. This is without even considering the negative effect of the council's choice of limiting village growth, which will continue the decline of villages and their services, particularly local shops. Thus as all the supermarket space for the area is proposed to be in Uckfield Town centre even more rural dwellers will need to access this area as their local services die out adding even further to the congestion problem. The council are relying on the new houses to fund the town centre redevelopment, yet do not appear to have produced any figures to show how this will happen, or whether 1000 houses are too many or not enough. Similarly generally recent new housing has been looked on as the milk cow to provide everything to do with infrastructure and local services, yet the council do not either seem to have considered whether the funds they require per new house will make SD1 non viable to housing developers, at this time of national economic problems and falling house prices. The objectors have been involved in making submissions to local planning for 25 years. It appears to the objectors that WDC are totally incapable of dealing with any matters properly, and usually take 5 years to do what should be done in 1 year. Thus in this case it is only 4 years before the town centre plan and housing allocation should be started. Yet the proposals at the moment seem to be just a wish list of hopes with nothing behind them. What is the likelihood that a town scheme will be detailed and agreed with all, planning permission granted, S106’s matters detaild and agree, early infrastructure agreed, planning granted and it put in place, site DS1 sorted out, especially the access and planning and S106 matters sorted, so work on all this can start by 2016???? the answer is virtually nil as 4 years to far too short with all the parties and complications involved, plus it is likely to be another 2 years before and LDF is in place at best. The other main problem is that the land for SD1 does not appear to be available. The objectors are acquainted with the owners of the land, Ridgewood Farm who told the objectors only in recent months that they have been fighting development of 40 years an don't want it on their land. So unless this has changed since, it would appear this land is unavailable for the development proposed. Presumably the council adds the site to the SHLAA themselves, and not the landowners. This allocation again shows how the council have incorrectly used the SHLAA, since only land that is available and deliverable should be considered for allocation. Not only does the land appear unavailable, but since the council have no idea where the access would be it, though 2 would be needed for such a large estate, it would appear undeliverable for this reason as well, so should not have been considered. It should also be noted that the towns sewage works is sited here, which would impact badly on any new housing or employment areas here, particularly as it would presumably need to be enlarged. Equally it would hardly be a nice green area to walk around either where the area near it to be POS. This site would also seem to be contrary to the council's and national policy on landscape effect as it is on the highest ground for miles and is very open to short and long views. Many other sites in the SHLAA have been rejected for much less landscape effect than this. The plan on fig 6 shows 2 areas of green infrastructure potential. However the one next to the Bellbrook estate is a thin strip between the link road and existing housing mainly consisting of a tree covered noise bund, so it is difficult to see what extra could be done here. The area to the south goes off of the SD1 site into land in other ownership, and even were SD1 to ever happen, it is hard to see why other landowners would add their land in without considerable financial incentives whih are not usually available for separate potential green land. Thus all in all the proposals in this area seem completely unsound and contrary to normal planning policy.
Details of Changes to be Made:
Site SD1 should be removed as it is undeliverable and unavailable. Some of the allocation can be moved to Maresfield as detailed in other objections, due to the adjacent Ashdown Business Park. Some of the allocation can go to deliverable and available sites around Uckfield, where they won't impact so greatly on the town centre traffic. Some can also go to the extra village allocations as set out in objections to WCS6.

Details of Reasons for Soundness/ Legal Complaince:
The identification of urban extensions is supported in principle. The policy identifies 12 Strategic Development Areas, all of which vary considerably in character. Not all of proposed Strategic Development Area SD1 (Uckfield) is suitable for development. Uckfield is identified as having a key role in assisting with the delivery of the Core Strategy up to 2030: the strategy for Uckfield specifically is to enhance the role of the town as a District Level Centre, serving the local community and surrounding area. Para 6.11(3) states inter alia that the identification of SD1 as an allocation is subject to the provision of suitable access and a number of other factors, with these to be addressed in subsequent DPDs, and which may increase the risk to delivery. The Core Strategy recognises that if development has not started at West Uckfield by 2016, a review in relation to Uckfield will be required. Whether development has started by 2016 is one issue. Others are: i. Whether it is genuinely appropriate for development to take place over the whole allocation as indicated in the key diagram. The Sustainability Appraisal of the Proposed Submission Core Strategy, Background Papers, February 2011, recognises this issue by stating “potential landscape issues as the area is on high ground” (p.217). i. The uncertainty regarding what further studies may reveal about the practical ability of the site to accommodate development. If development has not commenced before 2016, the Council should know before then whether a review of the Core Strategy is required; why should the Core Strategy limit the potential scope of any review to the Uckfield area (Para 6.11)? SD1 is supported to the extent that it relates well to the strategic highway network. The impact of residential and other development upon SD1 will however be too prominent and intrusive along this part of the A22 corridor. Much of the development will not be easily capable of being screened. The southern part of SD1 is most exposed. It is recommended that the most sensitive landscape is retained in SD1 as open space and, as a consequence, that SD1 be extended to the south of Lewes Road to include Horsted Pond Farm and Ridgewood House – any development here could be better accommodated within the landscape. SD1, as presently drawn, is too narrowly defined in extent – the inclusion of Horsted Pond Farm and Ridgewood House within it would provide the Plan with flexibility in delivering new development to the west of Uckfield. Proposed Change

Details of Changes to be Made:
It is proposed that the SD1 allocation be extended to include Horsted Pond Farm (in part of in whole) and Ridgewood House, with consequential changes made to the Core Strategy and Key Diagram.
7.1.1 In this section of the report we present our representations in regard to landscape matters in and informing the Core Strategy. Our representation is made in regard to paragraphs 3.30 – 3.33 of the submission Core Strategy, Policies WC4 and WC13 and supporting background papers. 7.1.2 For the purposes of this representation we have reviewed the ‘Landscape Character Assessment and Development Option Evaluation Study’ undertaken for the district (referred hereinafter as the ‘Landscape Study’), which is included as a background paper to the Core Strategy on the Councils website. However, it is not clear how the Landscape Study has been used to inform the spatial strategy as it is not specifically referred to in the text of Core Strategy nor is the Landscape Study listed as a background paper at paragraph 7.28 of the Core Strategy (although it is included as a background paper on the Councils website). 7.1.3 We have reviewed the methodology set out in the document and we have also reviewed whether the methodology has been consistently applied resulting in a final report that is robust, thorough and transparent and one that would form a credible evidence base suitable to inform the spatial strategy contained in the Core Strategy. 7.1.4 We contend that the Landscape Study is flawed and therefore the assessment of housing sites in the district, the spatial strategy and the Councils Sustainability Appraisal, and thus the Core Strategy, is unsound. 7.1.5 Our representation is summarised below: Section of Core Strategy: Spatial Planning Objectives 1, 3 and 11, Paras 3.30 - 3.33, Policy WCS4 Strategic Development Areas, Figure 6 Uckfield Area Strategy, Paras 6.9 and 6.11, Policy WSC13 Green Infrastructure, Paras 7.23 - 7.28Legally Compliant: -Sound: NoJustified: NoEffective: NoConsistent with national policy: No

Details of Reasons for Soundess/ Legal Complaince:

7.2.1 Wealden Council commissioned the Landscape Study from the Landscape Group at East Sussex County Council, in September 2007. It was published in February 2009. The purpose of the Study is to: 1. Inform the preparation of WDC Local Development Framework Core Strategy and; 2. Inform the development of specialist studies that have been produced to provide a robust evidence base to inform the Local Development Framework. The Landscape Study is not listed as a background paper at paragraph 1.7 of the Core Strategy (although it is included as a background paper on the Councils website). Policy WCS4 Strategic Development Areas and Paragraphs 6.9 and 6.11 7.1.10 The Core Strategy proposes that the land to the west of Uckfield be identified as a ‘strategic development area’ suitable for accommodating 1,000 homes and some 12,650 sq metres net of employment floor space and education provision as an extension to the urban area to the west of New Town. Paragraph 6.9 refers to the SHLAA and assessment of the potential sites at the fringes of the urban area. 7.1.11 In the light of the comments that follow in this section of our representations on the Landscape Study, it considered that this proposal be reassessed and, taking into account other representations made on other parts and policies contained in the Core Strategy, greater emphasis should be given to the suitability of land at Maresfield to accommodate increased housing numbers and a larger proportion of the housing requirements for the district. Policy WSC13 Green Infrastructure, Paragraphs 7.23 - 7.28 and Background Paper BP6 7.1.12 Policy WSC13 and paragraph 7.23 to 7.28 relating to Green Infrastructure is supported although it is considered that the anomalies and errors in the Landscape Study be addressed before this document is used to inform and guide the implementation of Green Infrastructure Strategy and also formulation of the specific measures for the protection and enhancement of the landscape which are to set out in the Delivery and Site Allocations DPD referred to at paragraph 7.28 of the Core Strategy. 7.1.13 It is not clear from reading the Core Strategy, how the Landscape Study has been used to inform the above policies. 7.2 Consideration of the Methodology employed in the Landscape Study 7.2.1 Wealden Council commissioned the Landscape Study from the Landscape Group at East Sussex County Council, in September 2007. It was published in February 2009. The purpose of the Study is to: 1. Inform the preparation of WDC Local Development Framework Core Strategy and; 2. Inform the development policies on landscape management and protection. 7.2.2 The Landscape Study states that it will: 1. Assess the existing landscape character of key search areas 2. Assess the quality and value of the existing landscape in these key search areas 3. Assess the sensitivity if the existing landscape and its capacity to accept change or having regard to the scope for mitigation 4. Make recommendations on preferred locations from a landscape perspective. 7.2.3 The Landscape Study purports to use a number of methodologies for the assessment and
identifies these as being: 1. For Landscape Character/ Quality and Value - Design Manual for Roads and Bridges
Vol 11, section 3, Part 5 (DT) which has been further refined by the Landscape Character Assessment Guidance for
England and Scotland (CA/SNH 2002) and; 2. For landscape sensitivity – Landscape Character Assessment
Guidance for England and Scotland, Topic Paper No.6: Techniques and criteria for Judging Capacity and
Sensitivity (CA 2002). 7.2.4 The Landscape Study sets out, in section 2.0, the methodology and criteria used for
each aspect of the landscape being assessed, including the following: 1. Landscape Quality (this should be
‘condition’ if following latest LCA guidance as the term quality is now a discredited approach to assessing
landscapes) 2. Landscape Value 3. Landscape Sensitivity 4. Visual Sensitivity 5. Landscape Capacity 7.2.5 In
relation to the assessment of landscape capacity, capacity is defined in Topic Paper No.6: ‘Techniques and
Criteria for Judging Capacity and Sensitivity’ as: ‘The degree to which a particular landscape type or area is able to
accommodate change without significant effect on its character, or overall change of landscape character type.
Capacity is likely to vary according to the type and nature of change being proposed’. 7.2.6 We have reviewed the
Landscape Study, in particular, the methodology set out in the document and whether this has been consistently
applied to form a credible evidence base suitable to inform the spatial strategy contained in the Core Strategy.
7.2.7 The review of the Core Strategy background paper indicates that the Landscape Study has not followed the
guidance in Topic Paper No.6. Topic Paper No.6 suggests that there are two approaches to assessing landscape
sensitivity. These are: 1. Judging Overall Landscape Sensitivity and; 2. Judging Landscape Sensitivity to a specific
type of change. 7.2.8 However, in order to assess landscape capacity, the assessment of the sensitivity of
different types or areas of landscape to the type of change in question must be combined with an assessment of
the more subjective or perceptual aspects of the landscape and of the value attached to the landscape. 7.2.9
The stages for assessing landscape capacity of a landscape are set out in Section 3.0 of Topic Paper No.6 and
reproduced in Figure 7.1 below. Figure 7.1: Stages for assessing landscape capacity Source: Landscape
Character Assessment Guidance for England and Scotland, Topic Paper No.6: Techniques and criteria for
Judging Capacity and Sensitivity (CA 2002) 7.2.10 Sections 5.0 and 6.0 of Topic Paper No.6 provide the more
detailed considerations that need to be taken into account. 7.2.11 The boxed text, at paragraph 2.11.2 of the
Landscape Study, follows the same assessment stages used to assess the landscape capacity to accommodate a
specific type of change and given the local scale of the assessment work it is considered that this is the
appropriate method to use. 7.2.12 However, Topic Paper No.6, at paragraph 6.5, also goes on to state that:
‘Capacity is all a question of the interaction between the sensitivity of the landscape, the type and amount of
change and the way that the landscape is valued’. 7.2.13 Sections 2.11 and 2.12 of the Landscape Study set out
the approach used by East Sussex County Council landscape group in undertaking the landscape study. However,
the assessment does not define the quantum of housing development used to assess the capacity of each
character area, nor is the LDF Core Issues and Options Consultation Paper July 2007 referred to as a guide to the
quantum of housing development used to assess each of the different character areas. The Landscape Study
does however state at paragraph 2.12.3 that: ‘an overall assessment can be made for each character area on the
capacity to accept the type of change being considered. This judgement is made according to the combination of
characteristics that contribute to a particular area of landscape. The capacity of an area to accept change is
related to the potential of the area to accommodate development in a particular location without detracting from the
overall character of that landscape. The capacity evaluation of each character area does not assume that this is
the capacity across the entire character area’ 7.2.14 There are a number interrelated issues raised in the above
paragraph which we now turn to. 7.2.15 In relation to the type of change, the Landscape Study defines, at
paragraph 2.12.6, the assumptions used for the assessment business uses, i.e. the assessment of sensitivity /
capacity is based on light industrial type uses which would be consistent with a residential environment and these
would be single storey units. However the Landscape Study does not define the full details of the housing use,
such as type (housing - single storey / two storey / three storey etc) or amount (large / medium / small scale
development) and we contend that the details of the change being considered is not transparent from the
Landscape Study, as although the type of change (i.e. housing) is known, the form and amount of housing is
unknown. These are important factors when considering the landscape capacity of an area to accommodate
development, especially if using the stages set in the Landscape Study. 7.2.16 A similar assumption to the
business use (or range of assumptions) could have been used for assessing the impact on housing on landscape
sensitivity / capacity of each character area. For example two to three storey houses at the following ranges: 1.
small scale housing between five to 50 dwellings 2. medium scale housing development between 50 to 200
dwellings, and 3. large scale housing development between 200 to 500 dwellings. 7.2.17 In relation to the
combination of the characteristics that contribute to a particular area, comments on these are made in later
sections (See paragraphs 7.4.1 to 7.4.14 below). 7.2.18 The Landscape Study also refers to mitigation and
management of the landscape (Section 2.13) and, in paragraph 2.13.1, it highlights that mitigation has been used to
determine the visual and character sensitivity of the landscape. This approach does not accord with Topic Paper
No.6 as mitigation should only be used to inform the visual sensitivity of the area assessed, (See Figure 7.1
above), and not directly the character sensitivity of an area (although visual aspects are one of the aspects that
inform the character of an area). Mitigation in itself can have a significant effect on character and the landscapes
capacity to accommodate development. In some cases mitigation would make an area less suitable to
accommodate development not more suitable. Again this, we would contend, is a flaw in the assessment. The
existing management of the landscape is relevant to determining the condition (or quality) of an area of landscape
but the identification of management opportunities is not relevant to determining the capacity of the landscape to
accommodate development. Management of the land could in itself bring about a change to the landscape which is discordant with its character, for instance managing the land to encourage woodland growth or planting extensive woodlands in a very open exposed landscape would lead to a significant change. 7.2.19 The methodology section of the Landscape Study also includes a part dealing with the Areas of Outstanding Natural Beauty (AONB) within the district. Section 2.14 refers to ‘AONBs and AONB Buffer Zones’ as a way of identifying higher value landscapes within Wealden. At paragraph 2.14.2 the Landscape Study states: ‘There is, in some areas adjacent to the AONB boundary a buffer zone to the AONB landscape. This is usually an area of similar character but not of the same quality as the AONB landscape and not covered by the same planning policy. Where relevant these areas are indicated in the figures’. 7.2.20 Paragraph 2.14.4, the Landscape Study goes on the state the following: ‘These buffer zones have been identified through the character area analysis. The relative sensitivity of these areas has been considered according to the landscape character to achieve a balanced comparison with AONB and AONB landscapes’. 7.2.21 The Landscape Study considers that there is support for this ‘buffer zone’ approach due to Policy EN2 (f) of the East Sussex and Brighton and Hove Structure Plan. We contend that this approach is flawed and unsound. Firstly, the Structure Plan has been superseded by the South East Plan and at the time of preparing the Landscape Study during the period August 2007 to February 2009, both East Sussex County Council and Wealden District Council would have been aware of the emerging South East Plan policies through the draft regional plan. Secondly, Policy EN2 (f) does not prohibit development but seeks to protect the Sussex Downs and High Weald AONBs and minimise the impact of development within them by requiring measures to integrate the development in to the landscape. Thirdly, there is no Government policy support for the concept of ‘AONB buffers’ in Planning Policy Statement No.7. Like Policy EN2 of the Structure Plan, PPS 7 does not prohibit development within the boundaries or adjoining an AONB but merely seeks to ensure that the landscapes within AONBs are considered carefully and appropriate measures taken to mitigate the harm that potential development may cause. 7.2.22 The fourth point is that, whilst the Council would seek support from Policy EN2 (f) as a way of ‘balancing the comparison between AONB and non AONB areas’ especially the areas of landscape close to the AONB boundary, the East Sussex and Brighton and Hove Structure Plan does not define the extent of the buffer zone on the Key Diagram nor is the extent of the buffer area set out in its explanatory text. We contend that the justification for this approach must be given very little weight. 7.2.23 Lastly, it is acknowledged that some areas of landscape within an AONB may be of poorer condition (quality) score and / or lower visual and character sensitivity than areas outside of the AONB but the adjustment in the landscape sensitivity / capacity scoring by introducing what appears to be an arbitrary AONB buffer zone seems to undermine the purposes and status of the AONB designation, (and its planning policy protection), by attaching increased value to a character area that adjoins the AONB which although it may be of a similar character, does not meet the quality criteria for inclusion within the AONB. In addition, it is noted that the Landscape Study has not been subject to peer review and there is no evidence that it has had stakeholder input / consultation with statutory consultees, such Natural England / High Weald AONB Joint Advisory Committee and other interested bodies to agree this approach to the AONBs. 7.2.24 The Study goes on to set out the method used to undertake a comparative evaluation of a potential development area within a character area which has capacity to accommodate development. This gives an early indication of sites which would be worthy of further consideration for development in landscape terms. We contend that the comparative assessment of character areas within the District is flawed as the starting point for the assessment the landscape sensitivity / capacity analysis is unsound for the reason given above. 7.2.25 Notwithstanding the above point, Section 2.15.4 of the Landscape Study states that: ‘Prior to coming to a firm view on the full potential and scope in these areas further investigation would be required’. 7.2.26 However, the Study does not present evidence of this further investigation or how preferred development areas have been chosen; for example there is no detailed assessment of the west of Uckfield area although this has been identified as a major urban extension area under Policy WCS4 - SD1. 7.3 Critical Review of the findings of the Landscape Study 7.3.1 The Landscape Study methodology sets out how each landscape character is to be assessed and the information recorded using landscape character assessment sheets (section 2.5) whilst section 2.17 of the Landscape Study refers to mapping which is split into two stages. Stage 1 relates to recording baseline information on each character area such as planning designation, Public Right of Way and key viewpoint, focal point, landscape features and detractors (which should be read with the assessment record sheets). Stage 2 relates to the identification of potential development areas with indicative boundaries and also identifies key woods, shaws, hedges, tree belts etc and also the potential for mitigation planting. 7.3.2 In order to assess the robustness of the landscape capacity study for the purpose of this representation, the area around Uckfield, Maresfield and Five Ash Down were visited and the baseline information recorded on the landscape assessment sheets checked and the judgements reached reviewed. This check revealed that that were a number of elements / features not recorded or identified for some areas and therefore these factors were not able to inform the judgement reached. 7.3.3 For example, ‘Maresfield Area A’, is described as: ‘An open, undulating landscape used for pasture to the west and pleasure to the east. It is ungrazed showing some scrub. Wide long views to the south. Surrounded on other sides by mature trees and exotic Eucalyptus and Cedars from nearby Park. Fine houses on outskirts and within site. Fine clumps of Pines. Some road noise adjoins picturesque recreation ground’. 7.3.4 The assessment sheet omits a number of important features such as areas of woodlands and plantations, (some of which are ancient woodlands and provide screening, containment and form visual barriers). Hedges, fences, footpaths and reference to the bypass were not recorded. The assessment sheet also refers to parkland and that the majority of the land is amenity land lacking management. A wide long view(s) out to
the south is highlighted as a key feature which is correct when looking south from a small part of the area but elsewhere views are contained and obscured by landform and vegetation. The record sheet includes a photograph of the view south but this is not taken from the recreation ground as recorded on the map Figure 52. The photograph was taken from private land on the footpath. 7.3.5 In the visual appraisal section of the assessment sheet it records the local receptors as amenity land and houses, types of view as long views from top of ridge to the south and visual barriers as landform / trees and hedges. It concludes that the sensitivity is high (see table 7.1 below). It is acknowledged that there are views within the area but these tend to be short partial or glimpsed views with long views out towards the south from high ground in the north eastern parts of character area. Views into the area are very limited and development within the area would have a minimal impact on views. However, in views from the ridge to the south the recreation occupying the north eastern parts of the character area is seen whilst the remaining areas are hidden from view and therefore the visual sensitivity of the majority of the area is low. 7.3.6 The resultant evaluation of this area was considered as follows: Table 7.1: Landscape Study Assessment, Maresfield Area A Character Area Maresfield A Quality Good Value Medium Sensitivity to Change Moderate Visual Sensitivity High Management Opportunities Mange hedges and grazing. Mange recreational spaces and access to countryside. Need to retain gap between Maresfield and Uckfield. Potential for Mitigation LowPlanting would change open character and obscure long views out from recreation ground Capacity to Accept Change: Housing LowClose to village edge only Capacity to Accept Change: Business Low 7.3.7 We contend that the record sheets are incorrect and the judgement on quality / condition is erroneous and should be ‘ordinary’ as most of the land is unmanaged comprising rank grassland of little intrinsic landscape value and the visual sensitivity of the area is ‘moderate or low’ due to the strong enclosure afforded to the area. It is interesting to note that one of the management opportunities is to retain a gap between Maresfield and Uckfield although there is no planning policy support for the retention of gaps in the Core Strategy or previous Non Statutory Wealden Local Plan. 7.3.8 By comparison, another example is Character Area L – land to the west of Uckfield, which is described as: ‘Land sloping away from urban edge to Uck valley and A26 Uckfield by pass. Strong field structure with arable and pasture. Some large fields. Sewage works detractors. Few focuses of character. Development would need a well defined edge to prevent creep’. 7.3.9 The assessment sheet for this character area has recorded the land cover and landscape elements correctly but has not recorded any landform features and relatively few aesthetic factors, although it describes the land as sloping away from the urban edge with a strong field structure with arable and pasture. The landscape condition is considered to be fair which is not defined in the methodology although this changes to ordinary in the comparison table. 7.3.10 In the visual appraisal section of the assessment sheet it records the local receptors as countryside on the other side of Uck Valley, isolated properties, footpaths and A26 and houses on the urban edge, types of view as views across to woods at West Park / Butchers Wood, wooded ridge of Shortbridge across Uckfield Valley and visual barriers as few. It concludes that the sensitivity is ‘moderate’ (see table 7.2). Table 7.2: Landscape Study Assessment, Uckfield Area L Character Area Uckfield L Quality Good Value Medium Sensitivity to Change Moderate Visual Sensitivity High on ridge Management Opportunities Mange urban fringe. Farm diversification pressure. Manage wood and existing trees and hedges Potential for Mitigation Moderate Low on ridge as need to retain open fields Soften urban edge. Create green network. Relocate recreation ground Capacity to Accept Change: Housing Moderate Need well defined boundaries close to urban edge avoid high ground Capacity to Accept Change: Business No capacity 7.3.11 We contend that the record sheets are incorrect and the judgement on quality / condition is under estimated and should be ‘good’ as most of the land is attractive farmed landscape with some distinctiveness features with a recognisable landscape structure. The assessment sheet ignores the open exposed nature of this character area, with long views south and west and numerous views in to the area from the surrounding countryside (roads and footpaths), and therefore the visual sensitivity of the area should be ‘high’ due the number of viewpoints where views can be obtained. This can be compared to the Maresfield A area which is considered to have ‘high’ sensitivity rating but with a few vantage points available where development impacts will be perceived. 7.3.12 We also note that under management opportunities it is considered that the area could contribute to managing the urban fringe, which could equally apply to the land at Maresfield, and that under the potential for mitigation heading is considered that the area has a ‘moderate’ ability, although the introduction of mitigate planting as shown Figure 11 of the landscape Study would dramatically and significantly change the landscape character of the area. 7.3.13 These examples illustrate the inconsistency of the landscape assessment record sheet and the arbitrary nature of the judgements made. It does not give any confidence to the manner in which the Landscape Study has been undertaken or to the transparent way that the judgements have been reached. 7.4 Implications for the soundness of the Core Strategy 7.4.1 We have reviewed the ‘Landscape Character Assessment and Development Option Evaluation Study’ of the district. It is not clear how this Landscape Study has been used to inform the spatial strategy as it is not specifically referred to in the Core Strategy, nor is the Landscape Study listed as a background paper at paragraph 1.7 of the Core Strategy (although it is included as a background paper on the Councils website). 7.4.2 We have reviewed the methodology set out in the document and we have also reviewed whether the methodology has been consistently applied resulting in a final report that is robust, thorough, and transparent and that it would form a credible evidence base suitable to inform the spatial strategy contained in the Core Strategy. The Study also includes a methodology employed to undertake a comparative evaluation of a potential development area within a character area which has capacity to accommodate development. 7.4.3 The examples referred to in our analysis above illustrate the inconsistency of the landscape assessment record sheets and arbitrary nature of the judgements made and it does not give any confidence to the manner in which the
Landscape Study has been undertaken or to the transparent way that the judgements have been reached. 7.4.4 We contend that the Landscape Study is flawed and therefore the assessment of housing sites in the district, the spatial strategy and the Councils Sustainability Appraisal is unsound. In addition, in relation to the comparison assessment of sites within the district surrounding the towns and villages; we contend that this comparative assessment of character areas is flawed as the starting point for the assessment the landscape sensitivity / capacity analysis is unsound for the reason given above. 7.4.5 The Core Strategy proposes that the land to the west of Uckfield be identified as a ‘strategic development area’ suitable for accommodating 1,000 homes and some 12,650 sq metres net of employment floor space and education provision as an extension to the urban area to the west of New Town. In the light of the comments made on the Landscape Study, it is considered that this proposal be reassessed and, (taking into the other representations made on other parts and policies contained in the Core Strategy), greater emphasis be given to the suitability of land at Maresfield to accommodate increased housing numbers and a larger proportion of the housing requirements for the district. 7.4.6 Policy WSC13 relating to Green Infrastructure is supported although it is considered that the anomalies and errors in the Landscape Study be addressed before this document is used to inform and guide the implementation of Green Infrastructure Strategy and also formulation of the specific measures for the protection and enhancement of the landscape which are to set out in the Delivery and Site Allocations DPD referred to at paragraph 7.28 of the Core Strategy.

Details of Changes to be Made:

SUMMARY 7.4.7 In conclusion, we contend that the Core Strategy is unsound because: 1. It is not justified as it is not based on a sound evidence base as the Landscape Study (Landscape Character Assessment and Development Options Evaluation Study of the District) is flawed and therefore the assessment of housing sites in the district, the spatial strategy and the Councils Sustainability Appraisal is unsound. It is not clear how the Landscape Study has been used to inform the spatial strategy as it is not specifically referred to in the Core Strategy nor is the Landscape Study listed as a background paper at paragraph 1.7 of the Core Strategy; 2. It is not justified because the Landscape Study as it is not robust, thorough, and transparent and that it does not form a credible evidence base suitable to inform the spatial strategy contained in the Core Strategy. The Landscape Study contains a number inconsistencies set out in the landscape assessment record sheets and contains a number of arbitrary judgements and so it does not give any confidence to the manner in which the Landscape Study has been undertaken or to the transparent way that the judgements have been reached. It is not consistent with national policy as the methodology for undertaking the Landscape Study (which has been used to inform the spatial strategy) refers to ‘AONB and AONB Buffer Zones’ as a way of identifying higher value landscapes. There are a number of reasons why this approach is unsound but there is no Government policy support for the concept of ‘AONB buffers’ in Planning Policy Statement No.7 or any other policy guidance.

Details of Reasons for Soundess/ Legal Complaince:

It is WSL’s intention to promote Ridgewood Farm as an urban extension to the west of Uckfield in accordance with Policy WCS4. to this end, WSL acknowledges the infrastructure requirements that the Council envisages and the timing for the delivery of strategic development set out in paragraphs 6.3 - 6.11 of the document. WSL intends to work with the Council in order to deliver a comprehensive development that includes agreed infrastructure requirements. It is also the intention of WSL to work with the Council to commence the delivery of strategic development by 2016, in accordance with paragraph 6.11 of the Porposed Submission Core Strategy. WSL is confident that its master plan exercise will demonstrate the suitability, availability and ultimate deliverability of this site for strategic development. To this end, WSL is also confident that the master plan work will demonstrate that any matters raised through this consultation exercise can be positively addressed and therefore will not affect the deliverability of Ham Farm for strategic development.

Details of Changes to be Made:
Details of Reasons for Soundness/ Legal Compliance:
"Supplementary documents have been submitted but not attached, and may be viewed at the Council offices on request". Paragraph 6.11 Point 3 Bullet Point 2. Amend to reflect revised housing strategy.

Details of Changes to be Made:
REVISION SOUGHT Replace 1,000 homes with 1,450 homes.
Many of the aims set out for Uckfield seem to be contradictory, as well seemingly to be undeliverable or the chosen land is unavailable. As set out there are congestion problems in the town centre and the Framfield Road junction. Proposals to deal with this have been mooted for the last 5 to 7 years though no detail or costings have yet been produced. The only consultation some years ago only really amounted to a scheme to promoted by Tesco’s to meet their aim for a larger supermarket. This traffic proposal appears to involve a gyratory scheme though again no great details has ever been produced, and it appears to have major problems due to the various landowners not agreeing to join in. However whatever the scheme may be, it may cope with the current traffic levels but it would seem this will be totally negated by the proposed additional housing, retail and employment development. It is proposed to allow much larger supermarket space in the town centre plus an additional unspecified number of houses. Additionally the proposed SD1 allocation with no identified access at the moment can only realistically come out on the New town Road, since it would seem unlikely that the access to a large housing estate can go through the Bellbrook Industrial Estate. Thus all this extra development will immediately need to use any modified road scheme and just end up causing as much congestion if not more, as the current road systems has, thus totally negating any road improvements. This is without even considering the negative effect of the council’s choice of limiting village growth, which will continue the decline of villages and their services, particularly local shops. Thus as all the supermarket space for the area is proposed to be in Uckfield Town centre even more rural dwellers will need to access this area as their local services die out adding even further to the congestion problem. The council are relying on the new houses to fund the town centre redevelopment, yet do not appear to have produced any figures to show how this will happen, or whether 1000 houses are too many or not enough. Similarly generally recent new housing has been looked on as the milch cow to provide everything to do with infrastructure and local services, yet the council do not either seem to have considered whether the funds they require per new house will make SD1 non viable to housing developers, at this time of national economic problems and falling house prices. The objectors have been involved in making submissions to local planning for 25 years. It appears to the objectors that WDC are totally incapable of dealing with any matters properly, and usually take 5 years to do what should be done in 1 year. Thus in this case it is only 4 years before the town centre plan and housing allocation should be started. Yet the proposals at the moment seem to be just a wish list of hopes with nothing behind them. What is the likelihood that a town scheme will be detailed and agreed with all, planning permission granted, S106’s matters detailed and agree, early infrastructure agreed, planning granted and it put in place, site DS1 sorted out, especially the access and planning and S106 matters sorted, so work on all this can start by 2016???? the answer is virtually nil as 4 years to far too short with all the parties and complications involved, plus it is likely to be another 2 years before and LDF is in place at best. The other main problem is that the land for SD1 does not appear to be available. The objectors are acquainted with the owners of the land, Ridgewood Farm who told the objectors only in recent months that they have been fighting development of 40 years an don’t want it on their land. So unless this has changed since, it would appear this land is unavailable for the development proposed. Presumably the council adds the site to the SHLAA themselves, and not the landowners. This allocation again shows how the council have incorrectly used the SHLAA, since only land that is available and deliverable should be considered for allocation. Not only does the land appear unavailable, but since the council have no idea where the access would be it, though 2 would be needed for such a large estate, it would appear undeliverable for this reason as well, so should not have been considered. It should also be noted that the towns sewage works is sited here, which would impact badly on any new housing or employment areas here, particularly as it would presumably need to be enlarged. Equally it would hardly be a nice green area to walk around either where the area near it to be POS. This site would also seem to be contrary to the council’s and national policy on landscape effect as it is on the highest ground for miles and is very open to short and long views. Many other sites in the SHLAA have been rejected for much less landscape effect than this. The plan on fig 6 shows 2 areas of green infrastructure potential. However the one next to the Bellbrook estate is a thin strip between the link road and existing housing mainly consisting of a tree covered noise bund, so it is difficult to see what extra could be done here. The area to the south goes off of the SD1 site into land in other ownership, and even were SD1 to ever happen, it is hard to see why other landowners would add their land in without considerable financial incentive which are not usually available for separate potential green land. Thus all in all the proposals in this area seem completely unsound and contrary to normal planning policy.
Details of Changes to be Made:
Site SD1 should be removed as it is undeliverable and unavailable. Some of the allocation can be moved to Maresfield as detailed in other objections, due to the adjacent Ashdown Business Park. Some of the allocation can go to deliverable and available sites around Uckfield, where they won't impact so greatly on the town centre traffic. Some can also go to the extra village allocations as set out in objections to WCS6.

Representation ID
378
Person ID 521943 Eddison
Agent ID 335759 Batcheller Monkhouse
Paragraph 6.3
Sound ☑ Yes ☐ No ☑ Justified ☐ Effective ☐ Consistent with national policy
Legally Compliant ☑ Yes ☐ No

Details of Reasons for Soundess/ Legal Complaince:
The identification of urban extensions is supported in principle. The policy identifies 12 Strategic Development Areas, all of which vary considerably in character. Not all of proposed Strategic Development Area SD1 (Uckfield) is suitable for development. Uckfield is identified as having a key role in assisting with the delivery of the Core Strategy up to 2030: the strategy for Uckfield specifically is to enhance the role of the town as a District Level Centre, serving the local community and surrounding area. Para 6.11(3) states inter alia that the identification of SD1 as an allocation is subject to the provision of suitable access and a number of other factors, with these to be addressed in subsequent DPDs, and which may increase the risk to delivery. The Core Strategy recognises that if development has not started at West Uckfield by 2016, a review in relation to Uckfield will be required. Whether development has started by 2016 is one issue. Others are: i. Whether it is genuinely appropriate for development to take place over the whole allocation as indicated in the key diagram. The Sustainability Appraisal of the Proposed Submission Core Strategy, Background Papers, February 2011, recognises this issue by stating “potential landscape issues as the area is on high ground” (p.217). i. The uncertainty regarding what further studies may reveal about the practical ability of the site to accommodate development. If development has not commenced before 2016, the Council should know before then whether a review of the Core Strategy is required; why should the Core Strategy limit the potential scope of any review to the Uckfield area (Para 6.11)? SD1 is supported to the extent that it relates well to the strategic highway network. The impact of residential and other development upon SD1 will however be too prominent and intrusive along this part of the A22 corridor. Much of the development will not be easily capable of being screened. The southern part of SD1 is most exposed. It is recommended that the most sensitive landscape is retained in SD1 as open space and, as a consequence, that SD1 be extended to the south of Lewes Road to include Horsted Pond Farm and Ridgewood House – any development here could be better accommodated within the landscape. SD1, as presently drawn, is too narrowly defined in extent – the inclusion of Horsted Pond Farm and Ridgewood House within it would provide the Plan with flexibility in delivering new development to the west of Uckfield. Proposed Change

Details of Changes to be Made:
It is proposed that the SD1 allocation be extended to include Horsted Pond Farm (in part of in whole) and Ridgewood House, with consequential changes made to the Core Strategy and Key Diagram.
Many of the aims set out for Uckfield seems to be contradictory, as well semingly to be undeliverable or the chosen land is unavailable. As set out there are congestion problems in the town centre and the Framfield Road junction. Proposals to deal with this have been mouted for the last 5 to 7 years though no detail or costings have yet been produced. The only consultation some years ago only really amounted to a scheme to promoted by Tesco's to meet their aim for a larger supermarket. This traffic proposal appears to involve a gyatory scheme though again no great details has ever been produced, and it appears to have major problems due to the various landowners not agreeing to join in. However whatever the scheme may be, it may cope with the current traffic levels but it would seem this will be totally negated by the proposed additional housing, retail and employment development. It is proposed to allow much larger supermarket space in the town centre plus an additional unspecified number of houses. Additionaly the proposed SD1 allocation with no identified access at the moment can only realistically come out on the New town Road, since it would seem unlikely that the access to a large housing estate can go through the Bellbrook Industrial Estate. Thus all this extra development will immediately need to use any modified road scheme and just end up causing as much congestion if not more, as the current road system has, thus totally negating any road improvements. This is without even considering the negative effect of the council's choice of limiting village growth, which will continue the decline of villages and their services, particularly local shops. 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Details of Reasons for Soundness/ Legal Compliance:
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Details of Changes to be Made:
It is proposed that the SD1 allocation be extended to include Horsted Pond Farm (in part of in whole) and Ridgewood House, with consequential changes made to the Core Strategy and Key Diagram.
Many of the aims set out for Uckfield seems to be contradictory, as well seemingly to be undeliverable or the chosen land is unavailable. As set out there are congestion problems in the town centre and the Framfield Road junction. Proposals to deal with this have been mooted for the last 5 to 7 years though no detail or costings have yet been produced. The only consultation some years ago only really amounted to a scheme to promoted by Tesco’s to meet their aim for a larger supermarket. This traffic proposal appears to involve a gyratory scheme though again no great details has ever been produced, and it appears to have major problems due to the various landowners not agreeing to join in. However whatever the scheme may be, it may cope with the current traffic levels but it would seem this will be totally negated by the proposed additional housing, retail and employment development. 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Details of Changes to be Made:
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Representation ID
380
Person ID Mr Eddison
521943 Batcheller Monkhouse
Agent ID Mr Ide
335759 Batcheller Monkhouse
Paragraph 6.5
Sound No Justified Effective Consistent with national policy
Legally Compliant Yes No

Details of Reasons for Soundess/ Legal Complaince:
The identification of urban extensions is supported in principle. The policy identifies 12 Strategic Development Areas, all of which vary considerably in character. Not all of proposed Strategic Development Area SD1 (Uckfield) is suitable for development. Uckfield is identified as having a key role in assisting with the delivery of the Core Strategy up to 2030: the strategy for Uckfield specifically is to enhance the role of the town as a District Level Centre, serving the local community and surrounding area. Para 6.11(3) states inter alia that the identification of SD1 as an allocation is subject to the provision of suitable access and a number of other factors, with these to be addressed in subsequent DPDs, and which may increase the risk to delivery. The Core Strategy recognises that if development has not started at West Uckfield by 2016, a review in relation to Uckfield will be required. Whether development has started by 2016 is one issue. Others are: i. Whether it is genuinely appropriate for development to take place over the whole allocation as indicated in the key diagram. The Sustainability Appraisal of the Proposed Submission Core Strategy, Background Papers, February 2011, recognises this issue by stating “potential landscape issues as the area is on high ground” (p.217). i. The uncertainty regarding what further studies may reveal about the practical ability of the site to accommodate development. If development has not commenced before 2016, the Council should know before then whether a review of the Core Strategy is required; why should the Core Strategy limit the potential scope of any review to the Uckfield area (Para 6.11)? SD1 is supported to the extent that it relates well to the strategic highway network. The impact of residential and other development upon SD1 will however be too prominent and intrusive along this part of the A22 corridor. Much of the development will not be easily capable of being screened. The southern part of SD1 is most exposed. It is recommended that the most sensitive landscape is retained in SD1 as open space and, as a consequence, that SD1 be extended to the south of Lewes Road to include Horsted Pond Farm and Ridgewood House – any development here could be better accommodated within the landscape. SD1, as presently drawn, is too narrowly defined in extent – the inclusion of Horsted Pond Farm and Ridgewood House within it would provide the Plan with flexibility in delivering new development to the west of Uckfield. Proposed Change

Details of Changes to be Made:
It is proposed that the SD1 allocation be extended to include Horsted Pond Farm (in part of in whole) and Ridgewood House, with consequential changes made to the Core Strategy and Key Diagram.
Many of the aims set out for Uckfield seem to be contradictory, as well seemingly to be undeliverable or the chosen land is unavailable. As set out there are congestion problems in the town centre and the Framfield Road junction. Proposals to deal with this have been mooted for the last 5 to 7 years though no detail or costings have yet been produced. The only consultation some years ago only really amounted to a scheme to promoted by Tesco's to meet their aim for a larger supermarket. This traffic proposal appears to involve a gyratory scheme though again no great details has ever been produced, and it appears to have major problems due to the various landowners not agreeing to join in. However whatever the scheme may be, it may cope with the current traffic levels but it would seem this will be totally negated by the proposed additional housing, retail and employment development. It is proposed to allow much larger supermarket space in the town centre plus an additional unspecified number of houses. Additionally the proposed SD1 allocation with no identified access at the moment can only realistically come out on the New town Road, since it would seem unlikely that the access to a large housing estate can go through the Bellbrook Industrial Estate. Thus all this extra development will immediately need to use any modified road scheme and just end up causing as much congestion if not more, as the current road system has, thus totally negating any road improvements. This is without even considering the negative effect of the council's choice of limiting village growth, which will continue the decline of villages and their services, particularly local shops. 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It appears to the objectors that WDC are totally incapable of dealing with any matters properly, and usually take 5 years to do what should be done in 1 year. Thus in this case it is only 4 years before the town centre plan and housing allocation should be started. Yet the proposals at the moment seem to be just a wish list of hopes with nothing behind them. What is the likelihood that a town scheme will be detailed and agreed with all, planning permission granted, S106's matters detailled and agree, early infrastructure agreed, planning granted and it put in place, site DS1 sorted out, especially the access and planning and S106 matters sorted, so work on all this can start by 2016???? the answer is virtually nil as 4 years to far too short with all the parties and complications involved, plus it is likely to be another 2 years before and LDF is in place at best. The other main problem is that the land for SD1 does not appear to be available. The objectors are acquainted with the owners of the land, Ridgewood Farm who told the objectors only in recent months that they have been fighting development of 40 years an don't want it on their land. So unless this has changed since, it would appear this land is unavailable for the development proposed. Presumably the council adds the site to the SHLAA themselves, and not the landowners. This allocation again shows how the council have incorrectly used the SHLAA, since only land that is available and deliverable should be considered for allocation. Not only does the land appear unavailable, but since the council have no idea where the access would be it, though 2 would be needed for such a large estate, it would appear undeliverable for this reason as well, so should not have been considered. 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The area to the south goes off of the SD1 site into land in other ownership, and even were SD1 to ever happen, it is hard to see why other landowners would add their land in without considerable financial incentives which are not usually available for separate potential green land. Thus all in all the proposals in this area seem completely unsound and contrary to normal planning policy.
Details of Changes to be Made:
Site SD1 should be removed as it is undeliverable and unavailable. Some of the allocation can be moved to Maresfield as detailed in other objections, due to the adjacent Ashdown Business Park. Some of the allocation can go to deliverable and available sites around Uckfield, where they won't impact so greatly on the town centre traffic. Some can also go to the extra village allocations as set out in objections to WCS6.

Representation ID
381

Person ID 521943
Mr Eddison Batcheller Monkhouse

Agent ID 335759
Mr Ide Batcheller Monkhouse

Paragraph 6.6

Sound ☑ Yes ☐ No ☑ Justified ☐ Effective ☐ Consistent with national policy

Legally Compliant ☑ Yes ☐ No

Details of Reasons for Soundess/ Legal Complaince:
The identification of urban extensions is supported in principle. The policy identifies 12 Strategic Development Areas, all of which vary considerably in character. Not all of proposed Strategic Development Area SD1 (Uckfield) is suitable for development. Uckfield is identified as having a key role in assisting with the delivery of the Core Strategy up to 2030: the strategy for Uckfield specifically is to enhance the role of the town as a District Level Centre, serving the local community and surrounding area. Para 6.11(3) states inter alia that the identification of SD1 as an allocation is subject to the provision of suitable access and a number of other factors, with these to be addressed in subsequent DPDs, and which may increase the risk to delivery. The Core Strategy recognises that if development has not started at West Uckfield by 2016, a review in relation to Uckfield will be required. Whether development has started by 2016 is one issue. Others are: i. Whether it is genuinely appropriate for development to take place over the whole allocation as indicated in the key diagram. The Sustainability Appraisal of the Proposed Submission Core Strategy, Background Papers, February 2011, recognises this issue by stating “potential landscape issues as the area is on high ground” (p.217). i. The uncertainty regarding what further studies may reveal about the practical ability of the site to accommodate development. If development has not commenced before 2016, the Council should know before then whether a review of the Core Strategy is required; why should the Core Strategy limit the potential scope of any review to the Uckfield area (Para 6.11)? SD1 is supported to the extent that it relates well to the strategic highway network. The impact of residential and other development upon SD1 will however be too prominent and intrusive along this part of the A22 corridor. Much of the development will not be easily capable of being screened. The southern part of SD1 is most exposed. It is recommended that the most sensitive landscape is retained in SD1 as open space and, as a consequence, that SD1 be extended to the south of Lewes Road to include Horsted Pond Farm and Ridgewood House – any development here could be better accommodated within the landscape. SD1, as presently drawn, is too narrowly defined in extent – the inclusion of Horsted Pond Farm and Ridgewood House within it would provide the Plan with flexibility in delivering new development to the west of Uckfield.

Proposed Change

Details of Changes to be Made:
It is proposed that the SD1 allocation be extended to include Horsted Pond Farm (in part of in whole) and Ridgewood House, with consequent changes made to the Core Strategy and Key Diagram.
Paragraph 6.7

Sound ☐ Yes ☑ No ☑ Justified ☑ Effective ☑ Consistent with national policy

Legally Compliant ☐ Yes ☐ No

Details of Reasons for Soundess/ Legal Complaince:

Many of the aims set out for Uckfield seems to be contradictory, as well seemingly to be undeliverable or the chosen land is unavailable. As set out there are congestion problems in the town centre and the Framfield Road junction. Proposals to deal with this have been mooted for the last 5 to 7 years though no detail or costings have yet been produced. The only consultation some years ago only really amounted to a scheme to promoted by Tesco's to meet their aim for a larger supermarket. This traffic proposal appears to involve a gyratory scheme though again no great details has ever been produced, and it appears to have major problems due to the various landowners not agreeing to join in. However whatever the scheme may be, it may cope with the current traffic levels but it would seem this will be totally negated by the proposed additional housing, retail and employment development. It is proposed to allow much larger supermarket space in the town centre plus an additional unspecified number of houses. Additionally the proposal SD1 allocation with no identified access at the moment can only realistically come out on the New town Road, since it would seem unlikely that the access to a large housing estate can go through the Bellbrook Industrial Estate. Thus all this extra development will immediately need to use any modified road scheme and just end up causing as much congestion if not more, as the current road system has, thus totally negating any road improvements. This is without even considering the negative effect of the council's choice of limiting village growth, which will continue the decline of villages and their services, particularly local shops. 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It should also be noted that the towns sewage works is sited here, which would impact badly on any new housing or employment areas here, particularly as it would presumably need to be enlarged. Equally it would hardly be a nice green area to walk around either where the area near it to be POS. This site would also seem to be contrary to the council's and national policy on landscape effect as it is on the highest ground for miles and is very open to short and long views. Many other sites in the SHLAA have been rejected for much less landscape effect than this. The plan on fig 6 shows 2 areas of green infrastructure potential. However the one next to the Bellbrook estate is a thin strip between the link road and existing housing mainly consisting of a tree covered noise bund, so it is difficult to see what extra could be done here. 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Paragraph 6.7

Sound
☑ Yes ☑ No ☑ Justified ☐ Effective ☐ Consistent with national policy

Legally Compliant ☑ Yes ☐ No

Details of Reasons for Soundess/ Legal Compliancy:
The identification of urban extensions is supported in principle. The policy identifies 12 Strategic Development Areas, all of which vary considerably in character. Not all of proposed Strategic Development Area SD1 (Uckfield) is suitable for development. Uckfield is identified as having a key role in assisting with the delivery of the Core Strategy up to 2030: the strategy for Uckfield specifically is to enhance the role of the town as a District Level Centre, serving the local community and surrounding area. Para 6.11(3) states inter alia that the identification of SD1 as an allocation is subject to the provision of suitable access and a number of other factors, with these to be addressed in subsequent DPDs, and which may increase the risk to delivery. The Core Strategy recognises that if development has not started at West Uckfield by 2016, a review in relation to Uckfield will be required. Whether development has started by 2016 is one issue. Others are: i. Whether it is genuinely appropriate for development to take place over the whole allocation as indicated in the key diagram. The Sustainability Appraisal of the Proposed Submission Core Strategy, Background Papers, February 2011, recognises this issue by stating “potential landscape issues as the area is on high ground” (p.217). i. The uncertainty regarding what further studies may reveal about the practical ability of the site to accommodate development. If development has not commenced before 2016, the Council should know before then whether a review of the Core Strategy is required; why should the Core Strategy limit the potential scope of any review to the Uckfield area (Para 6.11)? SD1 is supported to the extent that it relates well to the strategic highway network. The impact of residential and other development upon SD1 will however be too prominent and intrusive along this part of the A22 corridor. Much of the development will not be easily capable of being screened. The southern part of SD1 is most exposed. It is recommended that the most sensitive landscape is retained in SD1 as open space and, as a consequence, that SD1 be extended to the south of Lewes Road to include Horsted Pond Farm and Ridgewood House – any development here could be better accommodated within the landscape. SD1, as presently drawn, is too narrowly defined in extent – the inclusion of Horsted Pond Farm and Ridgewood House within it would provide the Plan with flexibility in delivering new development to the west of Uckfield. Proposed Change

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Paragraph 6.8

Sound ☑ Yes ☑ No ☑ Justified ☑ Effective ☑ Consistent with national policy

Legally Compliant ☑ Yes ☑ No

Details of Reasons for Soundess/ Legal Complaince:

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384

Person ID Mr Eddison
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Agent ID Mr Ide
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Paragraph 6.9

Sound ☑ Yes ☐ No ☑ Justified ☐ Effective ☐ Consistent with national policy

Legally Compliant ☑ Yes ☐ No

Details of Reasons for Soundess/ Legal Compliance:
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7 Landscape 7.1 Introduction 7.1.1 In this section of the report we present our representations in regard to landscape matters in and informing the Core Strategy. Our representation is made in regard to paragraphs 3.30 – 3.33 of the submission Core Strategy, Policies WC4 and WC13 and supporting background papers. 7.1.2 For the purposes of this representation we have reviewed the ‘Landscape Character Assessment and Development Option Evaluation Study’ undertaken for the district (referred hereinafter as the ‘Landscape Study’), which is included as a background paper to the Core Strategy on the Councils website. However, it is not clear how the Landscape Study has been used to inform the spatial strategy as it is not specifically referred to in the text of Core Strategy nor is the Landscape Study listed as a background paper at paragraph 1.7 of the Core Strategy (although it is included as a background paper on the Councils website). 7.1.3 We have reviewed the methodology set out in the document and we have also reviewed whether the methodology has been consistently applied resulting in a final report that is robust, thorough and transparent and one that would form a credible evidence base suitable to inform the spatial strategy contained in the Core Strategy. 7.1.4 We contend that the Landscape Study is flawed and therefore the assessment of housing sites in the district, the spatial strategy and the Councils Sustainability Appraisal, and thus the Core Strategy, is unsound. 7.1.5 Our representation is summarised below: Section of Core Strategy: Spatial Planning Objectives 1, 3 and 11, Paras 3.30 - 3.33, Policy WCS4 Strategic Development Areas, Figure 6 Uckfield Area Strategy, Paras 6.9 and 6.11, Policy WSC13 Green Infrastructure, Paras 7.23 - 7.28 Legally Compliant: -Sound: No; Justified: No; Effective: No; Consistent with national policy: No 7.1.6 Paragraph 3.30 of the Proposed Submission Core Strategy refers to Wealden’s environmental attributes and that they have an important part to play in the development of the spatial strategy and ‘had a significant impact upon the assessment of the suitability of housing land in relation to the SHLAA’. 7.1.7 Paragraph 3.30 goes on to state that: “...and sites have been carefully scrutinised with regards to landscape impact.” 7.1.8 Paragraph 3.33 refers to Government guidance and the level of protection this provides for the environment, particularly nationally and internationally designated sites, which are not duplicated in the Core Strategy. The paragraph goes on to state: “However, our strategy has been guided by high levels of protection on local and national levels, and more detailed policies are contained within the Core Strategy and further ones in subsequent DPDs.” 7.1.9 Paragraph 1.7 in the Introduction to the Core Strategy refers to a number of specialist studies that have been produced to provide a robust evidence base to inform the Local Development Framework. The Landscape Study is not listed as a background paper at paragraph 1.7 of the Core Strategy (although it is included as a background paper on the Councils website). Policy WCS4 Strategic Development Areas and Paragraphs 6.9 and 6.11 7.1.10 The Core Strategy proposes that the land to the west of Uckfield be identified as a ‘strategic development area’ suitable for accommodating 1,000 homes and some 12,650 sq metres net of employment floor space and education provision as an extension to the urban area to the west of New Town. Paragraph 6.9 refers to the SHLAA and assessment of the potential sites at the fringes of the urban area. 7.1.11 In the light of the comments that follow in this section of our representations on the Landscape Study, it considered that this proposal be reassessed and, taking into account other representations made on other parts and policies contained in the Core Strategy, greater emphasis should be given to the suitability of land at Maresfield to accommodate increased housing numbers and a larger proportion of the housing requirements for the district. Policy WSC13 Green Infrastructure, Paragraphs 7.23 - 7.28 and Background Paper BP6 7.1.12 Policy WSC13 and paragraph 7.23 to 7.28 relating to Green Infrastructure is supported although it is considered that the anomalies and errors in the Landscape Study be addressed before this document is used to inform and guide the implementation of Green Infrastructure Strategy and also formulation of the specific measures for the protection and enhancement of the landscape which are to set out in the Delivery and Site Allocations DPD referred to at paragraph 7.28 of the Core Strategy. 7.1.13 It is not clear from reading the Core Strategy, how the Landscape Study has been used to inform the above policies. 7.2 Consideration of the Methodology employed in the Landscape Study 7.2.1 Wealden Council commissioned the Landscape Study from the Landscape Group at East Sussex County Council, in September 2007. It was published in February 2009. The purpose of the Study is to: 1. Inform the preparation of WDC Local Development Framework Core Strategy and; 2. Inform the development policies on landscape management and protection. 7.2.2 The Landscape Study states that it will: 1. Assess the existing landscape character of key search areas 2. Assess the quality and value of the existing landscape in these key search areas 3. Assess the sensitivity if the existing landscape and its capacity to accept change or having regard to the scope for mitigation. 4. Make recommendations on preferred locations from a landscape perspective. 7.2.3 The Landscape Study purports to use a number of methodologies for the assessment and
identifies these as being: 1. For Landscape Character/ Quality and Value - Design Manual for Roads and Bridges Vol 11, section 3, Part 5 (DT) which has been further refined by the Landscape Character Assessment Guidance for England and Scotland (CA/SNH 2002) and; 2. For landscape sensitivity – Landscape Character Assessment Guidance for England and Scotland, Topic Paper No.6: Techniques and criteria for Judging Capacity and Sensitivity (CA 2002). 7.2.4 The Landscape Study sets out, in section 2.0, the methodology and criteria used for each aspect of the landscape being assessed, including the following: 1. Landscape Quality (this should be ‘condition’ if following latest LCA guidance as the term quality is now a discredited approach to assessing landscapes) 2. Landscape Value 3. Landscape Sensitivity 4. Visual Sensitivity 5. Landscape Capacity 7.2.5 In relation to the assessment of landscape capacity, capacity is defined in Topic Paper No.6: ‘Techniques and Criteria for Judging Capacity and Sensitivity’ as: ‘The degree to which a particular landscape type or area is able to accommodate change without significant effect on its character, or overall change of landscape character type. Capacity is likely to vary according to the type and nature of change being proposed’. 7.2.6 We have reviewed the Landscape Study, in particular, the methodology set out in the document and whether this has been consistently applied to form a credible evidence base suitable to inform the spatial strategy contained in the Core Strategy. 7.2.7 The review of the Core Strategy background paper indicates that the Landscape Study has not followed the guidance in Topic Paper No.6. Topic Paper No.6 suggests that there are two approaches to assessing landscape sensitivity. These are: 1. Judging Overall Landscape Sensitivity and; 2. Judging Landscape Sensitivity to a specific type of change. 7.2.8 However, in order to assess landscape capacity, the assessment of the sensitivity of different types or areas of landscape to the type of change in question must be combined with an assessment of the more subjective or perceptual aspects of the landscape and of the value attached to the landscape. 7.2.9 The stages for assessing landscape capacity of a landscape are set out in Section 3.0 of Topic Paper No.6 and reproduced in Figure 7.1 below. Figure 7.1: Stages for assessing landscape capacity Source: Landscape Character Assessment Guidance for England and Scotland, Topic Paper No.6: Techniques and criteria for Judging Capacity and Sensitivity (CA 2002) 7.2.10 Sections 5.0 and 6.0 of Topic Paper No.6 provide the more detailed considerations that need to be taken into account. 7.2.11 The boxed text, at paragraph 2.11.2 of the Landscape Study, follows the same assessment stages used to assess the landscape capacity to accommodate a specific type of change and given the local scale of the assessment work it is considered that this is the appropriate method to use. 7.2.12 However, Topic Paper No.6, at paragraph 6.5, also goes on to state that: ‘Capacity is all a question of the interaction between the sensitivity of the landscape, the type and amount of change and the way that the landscape is valued’. 7.2.13 Sections 2.11 and 2.12 of the Landscape Study set out the approach used by East Sussex County Council landscape group in undertaking the landscape study. However, the assessment does not define the quantum of housing development used to assess the capacity of each character area, nor is the LDF Core Issues and Options Consultation Paper July 2007 referred to as a guide to the quantum of housing development used to assess each of the different character areas. The Landscape Study does however state at paragraph 2.12.3 that: ‘an overall assessment can be made for each character area on the capacity to accept the type of change being considered. This judgement is made according to the combination of characteristics that contribute to a particular area of landscape. The capacity of an area to accept change is related to the potential of the area to accommodate development in a particular location without detracting from the overall character of that landscape. The capacity evaluation of each character area does not assume that this is the capacity across the entire character area’ 7.2.14 There are a number interrelated issues raised in the above paragraph which we now turn to. 7.2.15 In relation to the type of change, the Landscape Study defines, at paragraph 2.12.6, the assumptions used for the assessment business uses, i.e. the assessment of sensitivity / capacity is based on light industrial type uses which would be consistent with a residential environment and these would be single storey units. However the Landscape Study does not define the detail of the housing use, such as type (housing - single storey / two storey / three storey etc) or amount (large / medium / small scale development) and we contend that the details of the change being considered is not transparent from the Landscape Study, as although the type of change (i.e. housing) is known, the form and amount of housing is unknown. These are important factors when considering the landscape capacity of an area to accommodate development, especially if using the stages set in the Landscape Study. 7.2.16 A similar assumption to the business use (or range of assumptions) could have been used for assessing the impact on landscape sensitivity / capacity of each character area. For example two to three storey houses at the following ranges: 1. small scale housing between five to 50 dwellings 2. medium scale housing development between 50 to 200 dwellings, and 3. large scale housing development between 200 to 500 dwellings. 7.2.17 In relation to the combination of the characteristics that contribute to a particular area, comments on these are made in later sections (See paragraphs 7.4.1 to 7.4.14 below). 7.2.18 The Landscape Study also refers to mitigation and management of the landscape (Section 2.13) and, in paragraph 2.13.1, it highlights that mitigation has been used to determine the visual and character sensitivity of the landscape. This approach does not accord with Topic Paper No.6 as mitigation should only be used to inform the visual sensitivity of the area assessed, (See Figure 7.1 above), and not directly the character sensitivity of an area (although visual aspects are one of the aspects that inform the character of an area). Mitigation in itself can have a significant effect on character and the landscapes capacity to accommodate development. In some cases mitigation would make an area less suitable to accommodate development not more suitable. Again this, we would contend, is a flaw in the assessment. The existing management of the landscape is relevant to determining the condition (or quality) of an area of landscape but the identification of management opportunities is not relevant to determining the capacity of the landscape to...
accommodate development. Management of the land could in itself bring about a change to the landscape which is discordant with its character, for instance managing the land to encourage woodland growth or planting extensive woodlands in a very open exposed landscape would lead to a significant change. 7.2.19 The methodology section of the Landscape Study also includes a part dealing with the Areas of Outstanding Natural Beauty (AONB) within the district. Section 2.14 refers to ‘AONBs and AONB Buffer Zones’ as a way of identifying higher value landscapes within Wealden. At paragraph 2.14.2 the Landscape Study states: ‘There is, in some areas adjacent to the AONB boundary a buffer zone to the AONB landscape. This is usually an area of similar character but not of the same quality as the AONB landscape and not covered by the same planning policy. Where relevant these areas are indicated in the figures’. 7.2.20 Paragraph 2.14.4, the Landscape Study goes on the state the following: ‘These buffer zones have been identified through the character area analysis. The relative sensitivity of these areas has been considered according to the landscape character to achieve a balanced comparison with AONB and AONB landscapes’. 7.2.21 The Landscape Study considers that there is support for this ‘buffer zone’ approach due to Policy EN2 (f) of the East Sussex and Brighton and Hove Structure Plan. We contend that this approach is flawed and unsound. Firstly, the Structure Plan has been superseded by the South East Plan and at the time of preparing the Landscape Study during the period August 2007 to February 2009, both East Sussex County Council and Wealden District Council would have been aware of the emerging South East Plan policies through the draft regional plan. Secondly, Policy EN2 (f) does not prohibit development but seeks to protect the Sussex Downs and High Weald AONBs and minimise the impact of development within them by requiring measures to integrate the development into the landscape. Thirdly, there is no Government policy support for the concept of ‘AONB buffers’ in Planning Policy Statement No.7. Like Policy EN2 of the Structure Plan, PPS 7 does not prohibit development within the boundaries or adjoining an AONB but merely seeks to ensure that the landscapes within AONBs are considered carefully and appropriate measures taken to mitigate the harm that potential development may cause. 7.2.22 The fourth point is that, whilst the Council would seek support from Policy EN2 (f) as a way of ‘balancing the comparison between AONB and non AONB areas’ especially the areas of landscape close to the AONB boundary, the East Sussex and Brighton and Hove Structure Plan does not define the extent of the buffer zone on the Key Diagram nor is the extent of the buffer area set out in its explanatory text. We contend that the justification for this approach must be given very little weight. 7.2.23 Lastly, it is acknowledged that some areas of landscape within an AONB may be of poorer condition (quality) score and/or lower visual and character sensitivity than areas outside of the AONB but the adjustment in the landscape sensitivity/capacity scoring by introducing what appears to be an arbitrary AONB buffer zone seems to undermine the purposes and status of the AONB designation, (and its planning policy protection), by attaching increased value to a character area that adjoins the AONB which although it may be of a similar character, does not meet the quality criteria for inclusion within the AONB. In addition, it is noted that the Landscape Study has not been subject to peer review and there is no evidence that it has had stakeholder input / consultation with statutory consultees, such Natural England / High Weald AONB Joint Advisory Committee and other interested bodies to agree this approach to the AONBs. 7.2.24 The Study goes on to set out the method used to undertake a comparative evaluation of a potential development area within a character area which has capacity to accommodate development. This gives an early indication of sites which would be worthy of further consideration for development in landscape terms. We contend that the comparative assessment of character areas within the District is flawed as the starting point for the assessment the landscape sensitivity/capacity analysis is unsound for the reason given above. 7.2.25 Notwithstanding the above point, Section 2.15.4 of the Landscape Study states that: ‘Prior to coming to a firm view on the full potential and scope in these areas further investigation would be required’. 7.2.26 However, the Study does not present evidence of this further investigation or how preferred development areas have been chosen; for example there is no detailed assessment of the west of Uckfield area although this has been identified as a major urban extension area under Policy WCS4 - SD1. 7.3 Critical Review of the findings of the Landscape Study 7.3.1 The Landscape Study methodology sets out how each landscape character is to be assessed and the information recorded using landscape character assessment sheets (section 2.5) whilst section 2.17 of the Landscape Study refers to mapping which is split into two stages. Stage 1 relates to recording baseline information on each character area such as planning designation, Public Right of Way and key viewpoint, focal point, landscape features and detractors (which should be read with the assessment record sheets). Stage 2 relates to the identification of potential development areas with indicative boundaries and also identifies key woods, shaws, hedges, tree belts etc and also the potential for mitigation planting. 7.3.2 In order to assess the robustness of the landscape capacity study for the purpose of this representation, the area around Uckfield, Maresfield and Five Ash Down were visited and the baseline information recorded on the landscape assessment sheets checked and the judgements reached reviewed. This check revealed that that were a number of elements/features not recorded or identified for some areas and therefore these factors were not able to inform the judgement reached. 7.3.3 For example, ‘Maresfield Area A’, is described as: ‘An open, undulating landscape used for pasture to the west and pleasure to the east. It is ungrazed showing some scrub. Wide long views to the south. Surrounded on other sides by mature trees and exotic Eucalyptus and Cedars from nearby Park. Fine houses on outskirts and within site. Fine clumps of Pines. Some road noise adjoins picturesque recreation ground’. 7.3.4 The assessment sheet omits a number of important features such as areas of woodlands and plantations, (some of which are ancient woodlands and provide screening, containment and form visual barriers). Hedges, fences, footpaths and reference to the bypass were not recorded. The assessment sheet also refers to parkland and that the majority of the land is amenity land lacking management. A wide long view(s) out to
the south is highlighted as a key feature which is correct when looking south from a small part of the area but elsewhere views are contained and obscured by landform and vegetation. The record sheet includes a photograph of the view south but this is not taken from the recreation ground as recorded on the map Figure 52. The photograph was taken from private land on the footpath. 7.3.5 In the visual appraisal section of the assessment sheet it records the local receptors as amenity land and houses, types of view as long views from top of ridge to the south and visual barriers as landform / trees and hedges. It concludes that the sensitivity is high (see table 7.1 below). It is acknowledged that there are views within the area but these tend to be short partial or glimpsed views with long views out towards the south from high ground in the north eastern parts of character area. Views into the area are very limited and development within the area would have a minimal impact on views. However, in views from the ridge to the south the recreation occupying the north eastern parts of the character area is seen whilst the remaining areas are hidden from view and therefore the visual sensitivity of the majority of the area is low. 7.3.6 The resultant evaluation of this area was considered as follows: Table 7.1: Landscape Study Assessment, Maresfield Area A Character Area Maresfield A Quality Good Value Medium Sensitivity to Change Moderate Visual Sensitivity High Management Opportunities Mange hedges and grazing. Mange recreational spaces and access to countryside. Need to retain gap between Maresfield and Uckfield. Potential for Mitigation LowPlanting would change open character and obscure long views out from recreation ground Capacity to Accept Change: Housing LowClose to village edge only Capacity to Accept Change: Business Low 7.3.7 We contend that the record sheets are incorrect and the judgement on quality / condition is erroneous and should be ‘ordinary’ as most of the land is unmanaged comprising rank grassland of little intrinsic landscape value and the visual sensitivity of the area is ‘moderate or low’ due to the strong enclosure afforded to the area. It is interesting to note that one of the management opportunities is to retain a gap between Maresfield and Uckfield although there is no planning policy support for the retention of gaps in the Core Strategy or previous Non Statutory Wealden Local Plan. 7.3.8 By comparison, another example is Character Area L – land to the west of Uckfield, which is described as: ‘Land sloping away from urban edge to Uck valley and A26 Uckfield by pass. Strong field structure with arable and pasture. Some large fields. Sewage works detractors. Few focuses of character. Development would need a well defined edge to prevent creep’. 7.3.9 The assessment sheet for this character area has recorded the land cover and landscape elements correctly but has not recorded any landform features and relatively few aesthetic factors, although it describes the land as sloping away from the urban edge with a strong field structure with arable and pasture. The landscape condition is considered to be fair which is not defined in the methodology although this changes to ordinary in the comparison table. 7.3.10 In the visual appraisal section of the assessment sheet it records the local receptors as countryside on the other side of Uck Valley, isolated properties, footpaths and A26 and houses on the urban edge, types of view as views across to woods at West Park / Butchers Wood, wooded ridge of Shortbridge across Uckfield Valley and visual barriers as few. It concludes that the sensitivity is ‘moderate’ (see table 7.2). Table 7.2: Landscape Study Assessment, Uckfield Area L Character Area Uckfield L Quality Ordinary Value Medium Snaw Accessible for recreation Sensitivity to Change Moderate Visual Sensitivity Moderate High on ridge Management Opportunities Mange urban fringe. Farm diversification pressure. Manage wood and existing trees and hedges. Potential for Mitigation Moderate Low on ridge as need to retain open fields Soften urban edge. Create green network. Relocate recreation ground Capacity to Accept Change: Housing Moderate Need well defined boundaries close to urban edge avoid high ground Capacity to Accept Change: Business No capacity 7.3.11 We contend that the record sheets are incorrect and the judgement on quality / condition is under estimated and should be ‘good’ as most of the land is attractive farmed landscape with some distinctiveness features with a recognisable landscape structure. The assessment sheet ignores the open exposed nature of this character area, with long views south and west and numerous views in to the area from the surrounding countryside (roads and footpaths), and therefore the visual sensitivity of the area should be ‘high’ due the number of viewpoints where views can be obtained. This can be compared to the Maresfield A area which is considered to have ‘high’ sensitivity rating but with a few vantage points available where development impacts will be perceived. 7.3.12 We also note that under management opportunities it is considered that the area could contribute to managing the urban fringe, which could equally apply to the land at Maresfield, and that under the potential for mitigation heading is considered that the area has a ‘moderate’ ability, although the introduction of mitigate planting as shown Figure 11 of the landscape Study would dramatically and significantly change the landscape character of the area. 7.3.13 These examples illustrate the inconsistency of the landscape assessment record sheet and the arbitrary nature of the judgements made. It does not give any confidence to the manner in which the Landscape Study has been undertaken or to the transparent way that the judgements have been reached. 7.4 Implications for the soundness of the Core Strategy 7.4.1 We have reviewed the ‘Landscape Character Assessment and Development Option Evaluation Study’ of the district. It is not clear how this Landscape Study has been used to inform the spatial strategy as it is not specifically referred to in the Core Strategy, nor is the Landscape Study listed as a background paper at paragraph 1.7 of the Core Strategy (although it is included as a background paper on the Councils website). 7.4.2 We have reviewed the methodology set out in the document and we have also reviewed whether the methodology has been consistently applied resulting in a final report that is robust, thorough, and transparent and that it would form a credible evidence base suitable to inform the spatial strategy contained in the Core Strategy. The Study also includes a methodology employed to undertake a comparative evaluation of a potential development area within a character area which has capacity to accommodate development. 7.4.3 The examples referred to in our analysis above illustrate the inconsistency of the landscape assessment record sheets and arbitrary nature of the judgements made and it does not give any confidence to the manner in which the
Landscape Study has been undertaken or to the transparent way that the judgements have been reached. 7.4.4 We contend that the Landscape Study is flawed and therefore the assessment of housing sites in the district, the spatial strategy and the Councils Sustainability Appraisal is unsound. In addition, in relation to the comparison assessment of sites within the district surrounding the towns and villages; we contend that this comparative assessment of character areas is flawed as the starting point for the assessment the landscape sensitivity / capacity analysis is unsound for the reason given above. 7.4.5 The Core Strategy proposes that the land to the west of Uckfield be identified as a ‘strategic development area’ suitable for accommodating 1,000 homes and some 12,650 sq metres net of employment floor space and education provision as an extension to the urban area to the west of New Town. In the light of the comments made on the Landscape Study, it is considered that this proposal be reassessed and, (taking into account the other representations made on other parts and policies contained in the Core Strategy), greater emphasis be given to the suitability of land at Maresfield to accommodate increased housing numbers and a larger proportion of the housing requirements for the district. 7.4.6 Policy WSC13 relating to Green Infrastructure is supported although it is considered that the anomalies and errors in the Landscape Study be addressed before this document is used to inform and guide the implementation of Green Infrastructure Strategy and also formulation of the specific measures for the protection and enhancement of the landscape which are to set out in the Delivery and Site Allocations DPD referred to at paragraph 7.28 of the Core Strategy. ‘

Details of Changes to be Made:
SUMMARY 7.4.7 In conclusion, we contend that the Core Strategy is unsound because: 1. It is not justified as it is not based on a sound evidence base as the Landscape Study (Landscape Character Assessment and Development Options Evaluation Study of the District) is flawed and therefore the assessment of housing sites in the district, the spatial strategy and the Councils Sustainability Appraisal is unsound. It is not clear how the Landscape Study has been used to inform the spatial strategy as it is not specifically referred to in the Core Strategy nor is the Landscape Study listed as a background paper at paragraph 1.7 of the Core Strategy; 2. It is not justified because the Landscape Study as it is not robust, thorough, and transparent and that it does not form a credible evidence base suitable to inform the spatial strategy contained in the Core Strategy. The Landscape Study contains a number inconsistencies set out in the landscape assessment record sheets and contains a number of arbitrary judgements and so it does not give any confidence to the manner in which the Landscape Study has been undertaken or to the transparent way that the judgements have been reached. 3. It is not consistent with national policy as the methodology for undertaking the Landscape Study (which has been used to inform the spatial strategy) refers to ‘AONB and AONB Buffer Zones’ as a way of identifying higher value landscapes. There are a number of reasons why this approach is unsound but there is no Government policy support for the concept of ‘AONB buffers’ in Planning Policy Statement No.7 or any other policy guidance.
Figure 7 fails to give any impression of the additional housing that will ‘benefit’ Hailsham during the years to 2030. What, for instance, lurks under the fetching yellow blob euphemistically labelled ‘town centre regeneration’? Why it’s an approved planning application, WD/2009/2705, for 170 houses. So the SD2 allocation of 600 is in fact 770 or to put it another way virtually two years towards the annual target of 400 for the WHOLE of Wealden!

Details of Changes to be Made:

I agree that the Core Strategy is Legally Compliant and Sound, and I support its objectives.

I do not consider any change is necessary in respect of WCS4: Para 5.10 and Fig 7 which is sound, subject to highway access requirements for SD2
Details of Reasons for Soundess/ Legal Complaince:
Amend Fig 7 to include land further north of New Rd at Park Farm to allow comprehensive planning of the whole area from the hospital site to land south of New Rd. This could indicate a strategic gap (Parkland setting) south of Hospital site and include additional housing, employment and social/community facilities in the area. Remove and maintain a greater gap between the Cookoo Trail and Hellingly village to preserve and enhance the setting of this heritage feature. (see Plan under separate cover)

Details of Changes to be Made:
To undertake the above amendments

Details of Reasons for Soundess/ Legal Complaince:
The attached plan Drawing No. A-07-01 illustrates the points raised on our online representations no. 140 and 141

Details of Changes to be Made:
Amend Fig7 in accordance with plan A-07-01
Details of Reasons for Soundess/ Legal Compliance:

It is contended that in presenting the Core Strategy for South East Hailsham that the Council have misdirected themselves on issues relevant to that area; have ignored the area owned by our client by this misdirection and as a consequence should include our client's land within the broad location area of South East Hailsham. Clearly, it is not at the present time. Our client's site was considered under the Strategic Housing Land Availability Assessment (SHLAA) under the reference number 379/1310. This indicated that 25 housing units could be delivered in the period up to 5 years and 209 after 6 years. The consideration was, at that stage, favourable. However in Development of the Proposed Core Strategy this location area has been largely included within other land around the Mill Road area and an area South of Hailsham. There is specific reference to the siting of the Wast Water Treatment Works, which would result in potential odour control issues. Clearly, land at Little Marshfoot Farm and Old Marshfoot Farm would not be affected by any potential odour control issues. It is not now, and, in any event any prevailing wind would carry any odour that may exist across the considerable area of residential areas before reaching Little Marshfoot Farm let alone Old Marshfoot Farm. If there are issues of odour control they exist now and will affect those properties at the western corner of the South East Haisham Sector and will need to be resolved for the benefit of existing properties. The prevailing wind is from the South West. Further, consideration of the South East Hailsham Sector refers to the distance from the town centre. In fact Little Marshfoot Farm and Old Marshfoot Farm as submitted in the SHLAA Applications are closer to the town centre than the majority of the land highlighted as being South East Hailsham or South Hailsham. There is no published evidence to suggest that our client's land cannot deliver lower cost housing both by the marketplace and the mechanisms in place to deliver affordable housing. Our client would want to put the Wealden District Council to the task to demonstrate how they conclude that this area could not deliver the required housing at the lower end of the housing market or any other sector of the market.

Details of Changes to be Made:
Details of Reasons for Soundness/ Legal Complaince:

This huge increase of housing in this area is completely unsound as there is no rail service here. This will result in most journeys being made by car and so is unsustainable and contrary to the council's other policies. Whilst the council may say there is a rail service at Polegate this is some 7 or 8 miles away, and as already noted in that section, the station already has traffic and parking problems now, when most of the proposed housing in this South Wealden area has yet to be built. However if these allocations are to be kept it would show that WDC consider being within 7 or 8 miles away from a rail service is sustainable, and hence most areas in Wealden should therefore be accepted as sustainable since most areas are within 7 or 8 miles of a station. It is also contrary to planning policy and SHLAA to allocate land that is undeliverable. In this case there is insufficient sewage capacity, and the council have no idea how or if this can be overcome. The CS is supposed to provide certainly to development, not promote something that is completely uncertain. The comments in para. 6.20 are completely unacceptable in a CS. The above comment also applies to the identified highways problems. The council should know if they can overcome them or not now, leave it as a hope, which if it does not materialise will leave the allocations undeliverable at an unknown date in the future.

Details of Changes to be Made:
For the above reasons these allocations should be deleted and reallocated to deliverable site and sustainable areas.

Details of Reasons for Soundness/ Legal Complaince:
To meet the higher housing provision of 12,500 dwellings it is appropriate that Hailsham has additional allocated land. Land south of Hailsham is less contaminated that the proposed allocation north and east of the town. Access to land south of the town can be accommodated directly from the A22.

Details of Changes to be Made:
See attached amended Figure 7
Details of Reasons for Soundess/ Legal Complaince:
The removal of Stone Cross located land to prevent coalescence of settlements and to assist in delivery of housing in a sustainable and managed pattern that reflects the existing pattern of settlements would require the removal of at least part of SD7 from the Polegate and Stone Cross inset. Stone Cross has been incorrectly classified as a Service Centre and no regard has been made to settlement coalescence.

Details of Changes to be Made:
The designation of a South Hailsham urban extension that replaces part of the Stone Cross area as well as balancing the extension of the town to the north with development both closer to and more accessible to the town centre and employment areas.

Details of Reasons for Soundess/ Legal Complaince:
Consequential amendments to include a South Hailsham urban extension to provide for sustainable development in contrast to development in a wrongly classified settlement (Stone Cross) which is an unsuitable location attached to a settlement that does not benefit from the sustainable characteristics of Hailsham as well as preventing settlement coalescence and a change to the pattern of settlements in the district.

Details of Changes to be Made:
Amend Figure 7 to define an urban extension to South Hailsham centred on the Oaklands Farm area (100/1310)

Details of Reasons for Soundess/ Legal Complaince:
We support the Councils identification of an urban extension to the east of Hailsham to be commenced around 2017 as set out within SD2. The land is very logical and capable of supporting growth and can deliver the growth that the Council anticipates. We would however suggest, as with our earlier comments on policies WCS 1 and WCS 2 that additional growth should be planned for and with this in mind the land east of Hailsham has the ability to accommodate higher levels of growth than that presently planned for by the Council.

Details of Changes to be Made:
### Representation ID
1257

<table>
<thead>
<tr>
<th>Person ID</th>
<th>Mark Stephen Limited</th>
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<tbody>
<tr>
<td>533827</td>
<td>Agent ID: Mr Hughes</td>
</tr>
<tr>
<td></td>
<td>PHD Chartered Town Planners</td>
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</tbody>
</table>

Hailsham and Hellingly

Area Strategy

**Sound**

- Yes
- No
- Justified
- Effective
- Consistent with national policy

**Legally Compliant**

- Yes
- No

**Details of Reasons for Soundess/ Legal Complaince:**
The classification of Stone Cross as a service centre is wholly unjustified having regard to its characteristics. The definition of a Service Centre is "sustainable locations with a range of jobs, services and facilities, servicing predominantly nearby communities and the wider rural area but with accessibility to larger centres". Stone Cross cannot be considered to prove a range of jobs or services or facilities and the very limited local facilities comprising a small Tesco Estate/community shop, Vet, Chinese takeaway, hairdress, Estate Agent, Pharmacy, Public House, Cattery and Car Dealer. There is no meaningful employment provision in Stone Cross. Contrast Stone Cross with Polegate and the range and accessibility of the settlement and its is evident that the two are of a different classification as Polegate provides a wide range of retail, service and community facilities that are accessible to and genuinely serve the settlement and the wider area (notably including Stone Cross). Stone Cross should more accurately be considered to a Local Service centre or even a neighbourhood centre having regard to its very limited employment, community and retail facilities. The settlement is almost wholly dependent on surrounding settlements (Polegate, Hailsham and Eastbourne) for all its day to day needs.

**Details of Changes to be Made:**
Stone Cross should be reclassified to be a Local Service centre or even a neighbourhood centre having regard to its very limited employment, community and retail facilities.

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### Representation ID
1506

<table>
<thead>
<tr>
<th>Person ID</th>
<th>Mr Williams</th>
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<tbody>
<tr>
<td>103948</td>
<td>Agent ID: Kember Loudon Williams</td>
</tr>
</tbody>
</table>

Hailsham and Hellingly

Area Strategy

**Sound**

- Yes
- No
- Justified
- Effective
- Consistent with national policy

**Legally Compliant**

- Yes
- No

**Details of Reasons for Soundess/ Legal Complaince:**
1. The Core Strategy is unsound because it has defined Heathfield incorrectly within the settlement hierarchy. This is unjustified. It should be viewed as a 'District Centre' and not as a 'Service Centre'. The town fulfils the functions and characteristics of a District Centre as defined on Table 1. It is a far more important settlement within the district than the Council has suggested, evidenced in the Core Strategy paragraph 2.3 which identifies Heathfield as one of the five main towns in the district and in Policy SP04 which refers to "our five principal towns". The character of the town is very different to the other Service Centres identified. It is a largely self-contained settlement, with a wide range of services and facilities that serves a distinct part of the district. Due to the size of additional appendices they have not been uploaded but are available to view at the Council's offices.

**Details of Changes to be Made:**
2. Paragraph 3.4 states that, "the large majority of future planned growth in Wealden needs to be focused on the towns and larger villages in the hierarchy, where facilities services and site opportunites exist. It is considered that the Council has under-estimated the current and future roles that Heathfield can play in this respect by failing to properly recognise the character and function of the town."
Representation ID
1492

Person ID  Mr Nightingale  Agent ID  Mr Nightingale
332748  Millwood Designer Homes  102571  Kember Loudon Williams

Hailsham and Hellingly  Figure 7
Area Strategy

Sound  □ Yes  ☑ No  ☑ Justified  □ Effective  □ Consistent with national policy
Legally Compliant  □ Yes  □ No

Details of Reasons for Soundess/ Legal Complaince:
The Core Strategy is unsound because it has defined Heathfield incorrectly within the settlement hierarchy. This is unjustified. It should be viewed as a ‘District Centre’ and not as a ‘Service Centre’. The town fulfils the functions and characteristics of a District Centre as defined on table 1. It is a far more important settlement within the district than the Council has suggested. Indeed the Council itself identifies Heathfield as one of the five main towns in the District in paragraph 2.3 of the Proposed Core Strategy and Policy SP04 which refers to “our five principle towns”. The character of the town is very different to the other Service Centres identified. It is a largely self-contained settlement, with a wide range of services and facilities, that serves a distinct part of the district. Paragraph 3.4 states that, “the large majority of future planned growth in Wealden needs to be focused on the towns and larger villages in the hierarchy, where facilities services and site opportunities exist. It is considered that the Council has under-estimated the current and future roles that Heathfield can play in this respect by failing to properly recognise the character and function of the town. 3 In order to make the Core Strategy sound, Heathfield should be redefined within the Settlement hierarchy as a District Centre.

Details of Changes to be Made:
Heathfield should be re-defined in the Settlement Hierarchy as a District Centre

Representation ID
440

Person ID  Adams  Agent ID
512699

Hailsham and Hellingly  Figure 7
Area Strategy

Sound  □ Yes  ☑ No  ☑ Justified  □ Effective  □ Consistent with national policy
Legally Compliant  ☑ Yes  □ No

Details of Reasons for Soundess/ Legal Complaince:
Figure 7 fails to give any impression of the additional housing that will 'benefit' Hailsham in the years from 2011. Situated north of Hailsham, the Hellingly Hospital development WD/2006/2435/MEA, when it's full complement of 400 dwellings is complete, will provide the opportunity for around 600 commuters to rat-run through the countryside or assist in exploring the potential of the A271 to move traffic in and around Hailsham.

Details of Changes to be Made:
Summary of all Representations - Proposed Submission Core Strategy Regulation 27 - Report 11th July 2011

Representation ID
391

Person ID  Ms  Smith  Agent ID  Mr  Gillespie
521490  WE Vine Trust  521485  Impact Planning Services Ltd

Hailsham and Hellingly  Figure 7
Area Strategy

Sound  ☒  Yes  ☐  No  ☒  Justified  ☒  Effective  ☒  Consistent with national policy
Legally Compliant  ☒  Yes  ☐  No

Details of Reasons for Soundess/ Legal Complaince:
The diagram at Figure 7 Hailsham and Helingly should be revised to reflect the completion of the waste water treatment study, the completion of site option traffic modelling, other related infrastructure constraint analysis (including odour) and a re evaluation of the potential development options. The Trust considers that land to the south of Hailsham should be regarded as capable of coming forward to assist in the provision of additional housing on completion of these studies.

Details of Changes to be Made:
The Figure 7 diagramme will require revision to reflect additional development potential to the south of Hailsham.

Representation ID
316

Person ID  Adams
512699

Hailsham and Hellingly  Figure 7
Area Strategy

Sound  ☐  Yes  ☒  No  ☒  Justified  ☐  Effective  ☐  Consistent with national policy
Legally Compliant  ☒  Yes  ☐  No

Details of Reasons for Soundess/ Legal Complaince:
Figure 7 fails to give any impression of the additional housing that will "benefit" Hailsham during the years from 2011 to 2030. This section of housing comprises: 1. WD/WD/2009/1780/MEA for 128 homes on land east of Battle Road, B2104, and south of the A271. This discharges the traffic directly into Battle Road. The application has been approved. No development on this site has started. The roundabout featured in this application has not been built. Technically could you be correct in describing SD2 as an urban extension to an urban extension which is yet to be built.? 2. WD/2010/2176/MAJ for 24 units on land east of Battle Road. This was started in mid 2010. It also appears to discharge traffic directly into Battle Road. Technically could you be correct in describing SD2 as an urban extension to an urban extension which is yet to be built.?

Details of Changes to be Made:
Representation ID
1611
Person ID 107745
Pelham Homes
Agent ID 102625
Mrs Owen
Jennifer Owen & Associates Ltd.

Hailsham and Hellingly Area Strategy

Figure 7

Sound ☑ Yes ☐ No ☐ Justified ☐ Effective ☐ Consistent with national policy

Legally Compliant ☐ Yes ☐ No

Details of Reasons for Soundness/ Legal Compliance:

"Supplementary documents have been submitted but not attached, and may be viewed at the Council offices on request".

Details of Changes to be Made:

REVISION SOUGHT Increase overall number of dwellings to "at least 2,500". Increase the number of homes north of Hailsham and at hellingly to at least 1,300. Add a further bullet point and indicate development to accommodate at least 600 and amend Figure 7 accordingly.

Representation ID
1779
Person ID 522225
Mr Blake
Agent ID

Hailsham and Hellingly Area Strategy

Sound ☑ Yes ☐ No ☑ Justified ☐ Effective ☑ Consistent with national policy

Legally Compliant ☑ Yes ☐ No

Details of Reasons for Soundness/ Legal Compliance:

6. Conclusion 6.1 The Core Strategy states in para. 6.18 that it aims ‘to help ensure that the aspirations of the Hellingly Parish Council / Hailsham Town Council Masterplan and the local community can be realised’. However, it has rejected a key component of that Masterplan which reflects local opinion. 6.2 The District Council fears that development to the east of Hailsham ‘could adversely affect the health objective due to the significant odour issues from waste water treatment works that would be likely to affect new residents on a prolonged basis’. However, no development is scheduled to commence before 2017 which allows a lengthy period for investigations to be made into improvement of the existing waste water treatment works or into an alternative locations. It is not yet a reason for proposing or accepting a second best solution. Annual Monitoring Reports will identify the need to review any elements of the Core Strategy where monitoring has identified a sustained failure to meet the targets set and this is just one of a whole range of viability and other issues which remain to be investigated. 6.3 The North Hailsham residential allocation is not consistent with government policy in that it will not provide for social inclusion and a sustainable community; would not enhance the physical environment by diverting the A271 traffic through an existing residential community; would not promote accessibility to jobs, shopping, leisure facilities and services by public transport, walking and cycling; and would not reduce the need to travel, especially by car.

Details of Changes to be Made:

6.4 It is submitted, therefore, that the Core Strategy is not sound in its present form because its proposal to site 700 additional dwellings to the north of the A271 rather than to the east of Hailsham is neither justified nor consistent with government policy. It is requested that this proposal be deleted and that, if necessary, the housing allocation to the east of Battle Road be increased from 600 to 1,300 dwellings.
Details of Reasons for Soundess/ Legal Complaince:

6. Conclusion 6.1 The Core Strategy states in para. 6.18 that it aims ‘to help ensure that the aspirations of the Hellingly Parish Council / Hailsham Town Council Masterplan and the local community can be realised’. However, it has rejected a key component of that Masterplan which reflects local opinion. 6.2 The District Council fears that development to the east of Hailsham ‘could adversely affect the health objective due to the significant odour issues from waste water treatment works that would be likely to affect new residents on a prolonged basis’. However, no development is scheduled to commence before 2017 which allows a lengthy period for investigations to be made into improvement of the existing waste water treatment works or into an alternative locations. It is not yet a reason for proposing or accepting a second best solution. Annual Monitoring Reports will identify the need to review any elements of the Core Strategy where monitoring has identified a sustained failure to meet the targets set and this is just one of a whole range of viability and other issues which remain to be investigated. 6.3 The North Hailsham residential allocation is not consistent with government policy in that it will not provide for social inclusion and a sustainable community; would not enhance the physical environment by diverting the A271 traffic through an existing residential community; would not promote accessibility to jobs, shopping, leisure facilities and services by public transport, walking and cycling; and would not reduce the need to travel, especially by car.

Details of Changes to be Made:

6.4 It is submitted, therefore, that the Core Strategy is not sound in its present form because its proposal to site 700 additional dwellings to the north of the A271 rather than to the east of Hailsham is neither justified nor consistent with government policy. It is requested that this proposal be deleted and that, if necessary, the housing allocation to the east of Battle Road be increased from 600 to 1,300 dwellings.
Summary of all Representations - Proposed Submission Core Strategy Regulation 27 - Report 11th July 2011

Representation ID
1783
Person ID Mr Moon
Agent ID Hellingly Parish Council
334123

Hailsham and Hellingly Area Strategy

Sound ☐ Yes ☒ No ☑ Justified ☐ Effective ☑ Consistent with national policy
Legally Compliant ☑ Yes ☐ No

Details of Reasons for Soundess/ Legal Complaince:

6. Conclusion 6.1 The Core Strategy states in para. 6.18 that it aims ‘to help ensure that the aspirations of the Hellingly Parish Council / Hailsham Town Council Masterplan and the local community can be realised’. However, it has rejected a key component of that Masterplan which reflects local opinion. 6.2 The District Council fears that development to the east of Hailsham ‘could adversely affect the health objective due to the significant odour issues from waste water treatment works that would be likely to affect new residents on a prolonged basis’. However, no development is scheduled to commence before 2017 which allows a lengthy period for investigations to be made into improvement of the existing waste water treatment works or into an alternative locations. It is not yet a reason for proposing or accepting a second best solution. Annual Monitoring Reports will identify the need to review any elements of the Core Strategy where monitoring has identified a sustained failure to meet the targets set and this is just one of a whole range of viability and other issues which remain to be investigated. 6.3 The North Hailsham residential allocation is not consistent with government policy in that it will not provide for social inclusion and a sustainable community; would not enhance the physical environment by diverting the A271 traffic through an existing residential community; would not promote accessibility to jobs, shopping, leisure facilities and services by public transport, walking and cycling; and would not reduce the need to travel, especially by car.

Details of Changes to be Made:

6.4 It is submitted, therefore, that the Core Strategy is not sound in its present form because its proposal to site 700 additional dwellings to the north of the A271 rather than to the east of Hailsham is neither justified nor consistent with government policy. It is requested that this proposal be deleted and that, if necessary, the housing allocation to the east of Battle Road be increased from 600 to 1,300 dwellings.

Representation ID
1727
Person ID Mr Evison
Agent ID Mr Evison
521950 Hailsham St Mary Parochial Church Council 102472 Evison & Company

Hailsham and Hellingly Area Strategy

Sound ☑ Yes ☐ No ☐ Justified ☐ Effective ☐ Consistent with national policy
Legally Compliant ☑ Yes ☐ No

Details of Reasons for Soundess/ Legal Complaince:

6. The proposals for further population growth at Hailsham including urban extensions east (Policy SD2) and north (Policy SD3) of Hailsham are supported. The proposals themselves will create critical mass to provide economic and social benefit to the town. To maintain the viability of such large scale development, care should be taken to avoid excessive development contributions and to adhere strictly to the principles of Circular 05/05 namely that obligations must be: 1. relevant to planning ii necessary to make the proposed development acceptable in planning terms iii. directly related to the proposed development iv. Fairly and reasonably related in scale and kind to the proposed development; and v. reasonable in all other respects. given the scale of development and the lead time to first occupations where significant infrastructure works are required the respective 2017 and 2021 dates should be brought forward and treated with flexibility to ensure that planning permissions are granted well in advance of those dates in order to ensure completions in good time and so maintain housing land supply.

Details of Changes to be Made:
Paragraph 6.12

Details of Reasons for Soundess/ Legal Compliance:

This huge increase of housing in this area is completely unsound as there is no rail service here. This will result in most journeys being made by car and so is unsustainable and contrary to the council's other policies. Whilst the council may say there is a rail service at Polegate this is some 7 or 8 miles away, and as already noted in that section, the station already has traffic and parking problems now, when most of the proposed housing in this South Wealden area has yet to be built. However if these allocations are to be kept it would show that WDC consider being within 7 or 8 miles away from a rail service is sustainable, and hence most areas in Wealden should therefore be accepted as sustainable since most areas are within 7 or 8 miles of a station. It is also contrary to planning policy and SHLAA to allocate land that is undeliverable. In this case there is insufficient sewage capacity, and the council have no idea how or if this can be overcome. The CS is supposed to provide certainty to development, not promote something that is completely uncertain. The comments in para. 6.20 are completely unacceptable in a CS. The above comment also applies to the identified highways problems. The council should know if they can overcome them or not now, leave it as a hope, which if it does not materialise will leave the allocations undeliverable at an unknown date in the future.

Details of Changes to be Made:
For the above reasons these allocations should be deleted and reallocated to deliverable site and sustainable areas.

Paragraph 6.12

Sound ☑ Yes ☐ No ☑ Justified ☑ Effective ☑ Consistent with national policy
Legally Compliant ☐ Yes ☐ No

Details of Reasons for Soundess/ Legal Compliance:

We support the Councils identification of an urban extension to the east of Hailsham to be commenced around 2017 as set out within SD2. The land is very logical and capable of supporting growth and can deliver the growth that the Council anticipates. We would however suggest, as with our earlier comments on policies WCS 1 and WCS 2 that additional growth should be planned for and with this in mind the land east of Hailsham has the ability to accommodate higher levels of growth than that presently planned for by the Council.

Details of Changes to be Made:
Paragraph 6.13

Details of Reasons for Soundess/ Legal Complaince:
This huge increase of housing in this area is completely unsound as there is no rail service here. This will result in most journeys being made by car and so is unsustainable and contrary to the council's other policies. Whilst the council may say there is a rail service at Polegate this is some 7 or 8 miles away, and as already noted in that section, the station already has traffic and parking problems now, when most of the proposed housing in this South Wealden area has yet to be built. However if these allocations are to be kept it would show that WDC consider being within 7 or 8 miles away from a rail service is sustainable, and hence most areas in Wealden should therefore be accepted as sustainable since most areas are within 7 or 8 miles of a station. It is also contrary to planning policy and SHLAA to allocate land that is undeliverable. In this case there is insufficient sewage capacity, and the council have no idea how or if this can be overcome. The CS is supposed to provide certainly to development, not promote something that is completely uncertain. The comments in para. 6.20 are completely unacceptable in a CS. The above comment also applies to the identified highways problems. The council should know if they can overcome them or not now, leave it as a hope, which if it does not materialise will leave the allocations undeliverable at an unknown date in the future.

Details of Changes to be Made:
For the above reasons these allocations should be deleted and reallocated to deliverable site and sustainable areas.

Paragraph 6.13

Details of Reasons for Soundess/ Legal Complaince:
Reference should also be included to the recently opened Waitrose store as well as Tesco

Details of Changes to be Made:
Amend sentence to read: 'and the recent opening of new Tesco and Waitrose stores in addition to the existing Co-op and range of shops has significantly strengthened the town’s convenience shopping role.'
Representation ID
1361
Person ID Mr Richardson
220620
Agent ID Gleeceon Developments Ltd
Paragraph 6.13
Sound ☑ Yes ☐ No ☐ Justified ☐ Effective ☐ Consistent with national policy
Legally Compliant ☐ Yes ☐ No

Details of Reasons for Soundess/ Legal Complaince:
We support the Councils identification of an urban extension to the east of Hailsham to be commenced around 2017 as set out within SD2. The land is very logical and capable of supporting growth and can deliver the growth that the Council anticipates. We would however suggest, as with our earlier comments on policies WCS 1 and WCS 2 that additional growth should be planned for and with this in mind the land east of Hailsham has the ability to accommodate higher levels of growth than that presently planned for by the Council.

Details of Changes to be Made:

Representation ID
782
Person ID Mr & Flittner
106034
Paragraph 6.14
Sound ☐ Yes ☑ No ☑ Justified ☑ Effective ☑ Consistent with national policy
Legally Compliant ☑ Yes ☐ No

Details of Reasons for Soundess/ Legal Complaince:
This huge increase of housing in this area is completely unsound as there is no rail service here. This will result in most journeys being made by car and so is unsustainable and contrary to the council's other policies. Whilst the council may say there is a rail service at Polegate this is some 7 or 8 miles away, and as already noted in that section, the station already has traffic and parking problems now, when most of the proposed housing in this South Wealden area has yet to be built. However if these allocations are to be kept it would show that WDC consider being within 7 or 8 miles away from a rail service is sustainable, and hence most areas in Wealden should therefore be accepted as sustainable since most areas are within 7 or 8 miles of a station. It is also contrary to planning policy and SHLAA to allocate land that is undeliverable. In this case there is insufficient sewage capacity, and the council have no idea how or if this can be overcome. The CS is supposed to provide certainly to development, not promote something that is completely uncertain. The comments in para. 6.20 are completely unacceptable in a CS. The above comment also applies to the identified highways problems. The council should know if they can overcome them or not now, leave it as a hope, which if it does not materialise will leave the allocations undeliverable at an unknown date in the future.

Details of Changes to be Made:
For the above reasons these allocations should be deleted and reallocated to deliverable site and sustainable areas.
Paragraph 6.14

Details of Reasons for Soundness/ Legal Complaince:

We support the Council's identification of an urban extension to the east of Hailsham to be commenced around 2017 as set out within SD2. The land is very logical and capable of supporting growth and can deliver the growth that the Council anticipates. We would however suggest, as with our earlier comments on policies WCS 1 and WCS 2 that additional growth should be planned for and with this in mind the land east of Hailsham has the ability to accommodate higher levels of growth than that presently planned for by the Council.

Details of Changes to be Made:

Paragraph 6.14 should be redrafted to reflect the outcome of outstanding research.

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Paragraph 6.14

Details of Reasons for Soundness/ Legal Complaince:

The investigation of potential housing sites is incomplete and should await the outcome of the waste water treatment study relating to land south of Hailsham and also the traffic modelling of all options for development around Hailsham. The traffic modelling did not thoroughly examine all of the sites seen as potentially suitable including 254/1310 - Land to the West of the Sustrans Route, Ersham Farm, Ersham Road. The approach adopted by the Core Strategy in assessing the potential contribution which land to the south of Hailsham is considered arbitrary. Paragraph 8.21 of the Development of The Proposed Submission Core Strategy Background Paper, reveals a very poor explanation for the rejection of land to the south of Hailsham and suggests a predetermined site selection process more influenced by political preferences than by an impartial testing of the constraints and opportunities represented by each site put forward.

Details of Changes to be Made:

Paragraph 6.14 should be redrafted to reflect the outcome of outstanding research.
Details of Reasons for Soundess/ Legal Complaince:
This huge increase of housing in this area is completely unsound as there is no rail service here. This will result in most journeys being made by car and so is unsustainable and contrary to the council's other policies. Whilst the council may say there is a rail service at Polegate this is some 7 or 8 miles away, and as already noted in that section, the station already has traffic and parking problems now, when most of the proposed housing in this South Wealden area has yet to be built. However if these allocations are to be kept it would show that WDC consider being within 7 or 8 miles away from a rail service is sustainable, and hence most areas in Wealden should therefore be accepted as sustainable since most areas are within 7 or 8 miles of a station. It is also contrary to planning policy and SHLAA to allocate land that is undeliverable. In this case there is insufficient sewage capacity, and the council have no idea how or if this can be overcome. The CS is supposed to provide certainly to development, not promote something that is completely uncertain. The comments in para. 6.20 are completely unacceptable in a CS. The above comment also applies to the identified highways problems. The council should know if they can overcome them or not now, leave it as a hope, which if it does not materialise will leave the allocations undeliverable at an unknown date in the future.

Details of Changes to be Made:
For the above reasons these allocations should be deleted and reallocated to deliverable site and sustainable areas.

Details of Reasons for Soundess/ Legal Complaince:
We support the Councils identification of an urban extension to the east of Hailsham to be commenced around 2017 as set out within SD2. The land is very logical and capable of supporting growth and can deliver the growth that the Council anticipates. We would however suggest, as with our earlier comments on policies WCS 1 and WCS 2 that additional growth should be planned for and with this in mind the land east of Hailsham has the ability to accommodate higher levels of growth than that presently planned for by the Council.

Details of Changes to be Made:
I have examined the Proposed Submission Core Strategy (PSCS) against the Soundness Tool and found it wanting in terms of justification and effectiveness. The PSCS is a carefully prepared document, well thought out to offer a plan for the future but it does not take full account of the background research and documentation upon which it is based. In particular the proposals to expand Hailsham to the north do not comply with the sustainability or infrastructure objectives for Wealden and the proposals for development to the east and north of Hailsham are contrary to previous WDC research and to current Background Papers. Participation The consultation process has permitted all interested parties to engage but the options for answering have been strictly limited on a Yes or No or infrastructure objectives for Wealden and the proposals for development to the east and north of Hailsham are contrary to previous WDC research and to current Background Papers. Participation The consultation process has permitted all interested parties to engage but the options for answering have been strictly limited on a Yes or No basis when, in fact, more discursive answers are needed. Research/Fact Finding The content of the PSCS is not justified by the evidence, particularly in respect of infrastructure and especially highways and sewerage. Document No 7 Infrastructure Position Statement dated July 2009 refers under (A) Transport to the need to reduce travel distances. The PSCS shows strategic development to North and East Hailsham and towards Hellingly at distances from the town centre of up to 2.2 km. The South Wealden & Eastbourne Transport Study (SWETS) in paragraph 3.29 makes it clear that development for major housing allocations in north and east Hailsham would cause significant traffic pressure. Fewer pinch points and reduced traffic pressure are shown for development south of Hailsham. BP No 11 Infrastructure Delivery Plan defines the highways issue for development to the north and east as ‘CRITICAL’ and states ‘Development is contingent on delivery of this infrastructure’. Regarding sewerage/waste water capacity, as outlined in BP No 11, Hailsham North wastewater works had a consented discharge capacity at 1st Jan 2007 at 2900 dwellings. Hailsham South wastewater works had a capacity of 2400 dwellings at same date. This same document shows infrastructure developments in the Appendix for the North water treatment works is deemed CRITICAL to deliver 1500 dwellings. In the south of Hailsham ‘A scheme is not necessary to deliver the proposed Submission Core Strategy. However a scheme may be required for windfalls of housing and employment development.’ The same Background Paper states under ‘Further Supporting Evidence’: ‘Infrastructure is not necessary to achieve the full allocation of development in Hailsham, Polegate and Stone Cross as shown in the proposed Submission Core Strategy.’ This reliance on ‘massing’ in the north of Hailsham therefore has infrastructure issues which could be avoided by reducing the size of the Strategic Development Areas and spreading the housing to the south of the town. According to the Housing Needs Assessment the greatest number of low income families are located to the south and such development would help to balance with Affordable and mixed housing. The Table at the end of BP 11 sets out water treatment for extant Planning Permissions and completions from April 2006-April 2010 and states that there are capacity issues arising in the north from the Spatial Strategy but not in the south. The Conclusions to BP 11 state that wastewater funding has been secured from Offwat for works in 2012 to increase capacity in the Hailsham area and to undertake a study to investigate other technical solutions. The financial solution would be via appropriate developer contributions. In summary, therefore, according to BP11 there are no capacity issues in South Hailsham providing development is not beyond 2400 houses, less 885 already approved – namely 1515 dwellings in Polegate, Stonecross and South Hailsham. The Oaklands/Brickfield SHLAA site 100/1310 (224 dwellings) includes an East Sussex County Council approved road scheme to allow capacity for up to 300 dwellings. Landscape In January 2001 WDC prepared the ‘Low Weald Towns Sector Appraisal Landscape’ as part of the Background Papers for the then Local Plan Review. This document is partly incorporated in Background Paper No 6 Green Infrastructure. BP 6 does not include the following relevant paragraph about the landscape around Hailsham: ‘South of Hailsham: ….Urban Influence: On the western side of the sector the urban edge of Hailsham is generally well concealed by woodland often in deep ghylls or valleys. Scattered farms and houses are linked by a network of roads and lanes, the latter often sunk between high overgrown hedges. Horse grazing is common, a reflection of urban pressures, and as a result many of the pastures have the unkempt rather untidy appearance of paddocks. Rough sheds, water troughs and other paraphernalia are common place. ..’ Under the heading ‘Sensitivity to Development’ the Landscape Appraisal states: ‘The relatively open aspect of the landscape east of the Cuckmere flood plain makes it sensitive to change by new development and any large scale expansion of the built form beyond the existing urban edge of Hailsham in this location would tend to damage the rural setting of the town. .. ‘However there is very little scope for additional development on the western edge of the sector without threatening the intrinsic qualities of the landscape and more particularly the rural settings of Hellingly and Horselunges Manor. Importantly the urban influence of Hailsham is hardly noticeable in this reach of the Cuckmere valley apart from some ribbon development along the A271 on the immediate fringes of the town. Any significant expansion of the built form in this location (Hellingly/North Hailsham) would be likely to erode the historic landscape, structure and rural
Summary of all Representations - Proposed Submission Core Strategy Regulation 27 - Report 11th July 2011

character of this valuable landscape and irreparably damage the vulnerable gap of countryside between Hailsham and Hellingly.’ The Sustainability Appraisal sets out on p 42 the Sustainability Objectives for Wealden. The environmental objectives include: 7. ‘To make the most efficient use of land by prioritising brownfield sites for development, the re-use of existing buildings and promoting higher development densities.’ 11. ‘To conserve, enhance and make accessible for enjoyment the District’s countryside (in particular protecting the best and most versatile agricultural land) landscape, historic and built environment.’ 12. ‘Reduce the need to travel by car and promote alternative methods of transport.’ Development north and east of Hailsham is contrary to all or most of these objectives because it would increase travel distance, increase reliance on motor cars and damage the landscape and countryside, being on greenfield sites. SHLAA site 100/1310 Oaklands & The Brickfield are on a previously developed site, the Brickfield being defined as ‘Brownfield’. Oaklands, being used for business ‘horse culture’ and not agriculture is also classified as ‘brownfield/previously developed’ under PPS3. Development of these sites south of Hailsham therefore complies with the environmental objectives set out in the Sustainability Appraisal. Alternatives The Council’s chosen approach in the PSCS is therefore not the most appropriate given the reasonable alternatives and it goes against the Background Papers and existing evidence base. It would appear from the PSCS that sustainability considerations have not informed its content from the start. In particular, it is stated at Para 6.30 of the PSCS that the Polegate, Willingdon, Stonecross development of 700 dwellings can only take place when formal road infrastructure is in position. Therefore SD4 is not programmed to start until 2019/20. Similarly, Para 5.16 states that the proposed northern urban extension of Hailsham (SD2 & SD3) cannot occur without infrastructure improvements namely sewerage and roads. Hence SD2 cannot start until 2017 and SD3 until 2021. I would submit that this issue of roads indicates that, by definition, the Strategic Development Areas forming the northern extension of Hailsham towards Hellingly and those in Polegate, Willingdon and Stone cross are unsustainable. The PSCS was initially prepared in its Draft and Consultation forms on the basis of the requirements of the South East Plan. This is now being abandoned and will no longer be valid. Because the Draft Core Strategies and most of the evidence gathering and Background Papers were prepared in accordance with the South East Regional Plan, the current PSCS is probably invalid and I would submit that the Inspector should examine this. Delivery The Council has correctly identified the main issues that the PSCS is seeking to address but does not present a clear vision for Wealden District into the future, only the equivalent of a ‘wish list’ of construction of 400 houses a year and sufficient commercial development for employment. It does not clarify how to achieve this, particularly in respect of infrastructure. The major strategic development north and east of Hailsham introduce an unacceptable risk in the ability to provide the infrastructure. Cross boundary issues have not been adequately addressed. In particular with Mid Sussex District Council and associated County Council Highways liaison for a relief road around East Grinstead. Nor does it address the problems of coalescence between Polegate, Willingdon and Stonecross and Eastbourne Councils, nor does it address the cross boundary issues which will arise with Lewes District Council, particularly in connection with development around Uckfield. The PSCS sets out objectives in terms of construction and development but does not connect these in sufficient detail with the necessary infrastructure. The most obvious gap in the policies is related to transport, in that the entire PSCS is predicated on continued and developing use of motor vehicles, there being no positive action proposed in relation to the Uckfield-Lewes Railway line and only passing mention of the possibility of public transport or reinstated railway from Hailsham southwards to Polegate and Eastbourne. The timescales given in the Plan are governed by the moribund South East Plan and are not realistic, particularly in respect of infrastructure provision and especially given the proposals in the PSCS for development north of Hailsham which will rely on the motor car. This is contrary to Spatial Planning Objective 7. Currently the Strategic Development Areas SD2, SD3, SD4, SD6 & SD7 are all undeliverable as set out in Paras 3.16, 6.19 & 6.31 due to lack of existing highways infrastructure. This amounts to 2650 dwellings which cannot be delivered. Flexibility It is not clear whether the PSCS will be flexible enough to respond to a variety of, or unexpected changes in, circumstances, whether environmental, political or economic. Currently there is no clear plan for updating it. It cannot be very flexible because of the infrastructure constraints in Wealden District. Summary The PSCS does not explain how its key policy objectives will be achieved because it is based on the South East Plan which is being abolished. Most of the supporting documents are also based around the South East Plan and pre-date its abolition. The proposals for Strategic Development housing north and east of Hailsham and in Polegate, Willingdon & Stonecross are all undeliverable because of lack of highways infrastructure and, in the north, due to lack of sewerage capacity. These proposals therefore contradict Wealden’s own sustainability and environmental objectives. The PSCS does not take proper account of some sites in the SHLAA which are recognised as suitable and which meet sustainability objectives better than those selected for ‘Strategic Development’. The Oaklands and Brickfield site south of Hailsham (SHLAA 100/1300: 224 dwellings) is largely on previously-developed (brownfield) land and has a highways scheme for the Ersham Road roundabout agreed with East Sussex County Council and should be included in the SDAs to the exclusion of less suitable development. It meets the Hailsham Sustainability Objectives, being a local Urban Extension within walking distance of Hailsham town centre and offering proximity to open space, woodland and biodiversity – at a scale capable of delivering up to 224 dwellings with minimum impact on infrastructure and environmental amenity. This PSCS has given careful consideration to the issues within the Wealden area but falls short of achieving deliverability because of a decision to favour massing over locality, with all the consequent risks involved in reliance on a minimum number of SDAs and with an intention to release more greenfield sites than is compliant with government recommendations. I welcome the Review and monitoring procedures inherent in the PSCS but this document is currently unsound.
Details of Changes to be Made:
Development of SHLAA site 100/1310 would enable remodelling of the Ersham Road/South Road/Diplocks Way junction as set out above.

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Details of Reasons for Soundess/ Legal Compliance:
Demand Management Techniques may include active and/or 'passive' measures to affect traffic behaviour they typically include charging for road use and parking and planning new build without parking or substantially reducing it. In regard to car parking charges are Tesco likely to charge for parking. Definitely not. Is other town centre parking to be charged? Probably not. Is it sensible to propose an office development with reduced parking allocations as in the HA's response to WD/2009/2705? What, then, is the passive approach? The traffic is allowed to find it's own level. There are some minor disadvantages to this approach. An increasing number of Hailsham's residents will be subjected to more and more noise and pollution over a greater period of the day. An unpredictable journey time won't help the viability of the Station Road Industrial Estate or increase the take-up of units at the Swann Barn Business Centre. An indeterminate journey time for a priority bus service to Eastbourne isn't helpful.

Details of Changes to be Made:

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Details of Reasons for Soundess/ Legal Compliance:
Policies to restrain traffic, obtain modal shift in travel, reducing need to travel and improve the experience of non-car travel need to be sharpened and focused. Aspirations for these to happen must have necessary circumstances incorporated into the policies.

Details of Changes to be Made:
Demand management techniques for traffic in Hailsham (6.15) should be included in all the related and equivalent policies. There should be a definite commitment to traffic reduction measures and targets throughout the Strategy Plan document.
Details of Reasons for Soundess/ Legal Complaince:
The problems of the A271 are clearly detailed on Page 39 point 6.15 and in the Hailsham and Hellingly Masterplan and in ESCC reports. However, any changes/improvements will be the responsibility of ESCC Highways and outside the remit of Wealden District Council. As funding from S106 agreements is unlikely to be sufficient to fund any major changes, this issue should be addressed before extra housing is built

Details of Changes to be Made:
Yes
Sound
Justified
Effective
Consistent with national policy
Legally Compliant

This huge increase of housing in this area is completely unsound as there is no rail service here. This will result in most journeys being made by car and so is unsustainable and contrary to the council's other policies. Whilst the council may say there is a rail service at Polegate this is some 7 or 8 miles away, and as already noted in that section, the station already has traffic and parking problems now, when most of the proposed housing in this South Wealden area has yet to be built. However if these allocations are to be kept it would show that WDC consider being within 7 or 8 miles away from a rail service is sustainable, and hence most areas in Wealden should therefore be accepted as sustainable since most areas are within 7 or 8 miles of a station. It is also contrary to planning policy and SHLAA to allocate land that is undeliverable. In this case there is insufficient sewage capacity, and the council have no idea how or if this can be overcome. The CS is supposed to provide certainty to development, not promote something that is completely uncertain. The comments in para. 6.20 are completely unacceptable in a CS. The above comment also applies to the identified highways problems. The council should know if they can overcome them or not now, leave it as a hope, which if it does not materialise will leave the allocations undeliverable at an unknown date in the future.

Details of Changes to be Made:
For the above reasons these allocations should be deleted and reallocated to deliverable site and sustainable areas.
Details of Reasons for Soundess/ Legal Complaince:
We support the Councils identification of an urban extension to the east of Hailsham to be commenced around 2017 as set out within SD2. The land is very logical and capable of supporting growth and can deliver the growth that the Council anticipates. We would however suggest, as with our earlier comments on policies WCS 1 and WCS 2 that additional growth should be planned for and with this in mind the land east of Hailsham has the ability to accommodate higher levels of growth than that presently planned for by the Council.

Details of Changes to be Made:

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Details of Reasons for Soundess/ Legal Complaince:
We are pleased to see that your development distribution in policy WCS2 can be accommodated within existing consented capacities at Waste Water Treatment Works (WWTW). This is particularly important at the Hailsham North and South Waste Water Treatment Works that discharge into the Pevensey Levels. The Review of Consents As you are already aware, we are currently undertaking a Review of Consents (RoC) for the Pevensey Levels. The purposes of the RoC is to assess the impact of existing discharge consents into the Pevensey Levels, and make suitable changes where appropriate and fully justified. We have currently reached Stage 3 of the RoC which we are awaiting sign off from our Area Manager. We will make these results available to you at the earliest opportunity at the end of April 2011. The results will identify those consents that will require further assessment under the final Stage 4 of the RoC. We expect the final recommendations to be available by April 2012. This will be in time to inform your Site Allocations Development Plan Document. Through the course of the RoC there is a possibility that the existing consent for Hailsham North and South WWTWs will be reviewed which would have implications for the capacity of the works to accept the waste water flows from new development. We are happy that your Strategy is based on the most up to date information available, and you have addressed potential changes to existing consents through the RoC by considering phasing development with the provision of necessary infrastructure. Southern Water have also commissioned a study into alternative solutions for waste water treatment in the south of Wealden should it be needed. We therefore consider your Core Strategy sound in this regard.

No Deterioration Policy We are awaiting the publication of a ‘No Deterioration’ policy from Defra. The policy will seek to achieve the Water Framework Directive (WFD) requirement of achieving good ecological status of all waterbodies and not allowing any deterioration in status. The impact of this Policy is similar to that of the Review of Consents, insofar as there is a potential risk that it will result in existing consents being tightened in line with WFD. Again, without this policy being in place, we are satisfied that your Strategy is based on the best available information and remains sound in this regard. Once the No Deterioration Policy is published we will consider how this will impact on your Site Allocations and the need for waste water infrastructure delivery.

Details of Changes to be Made:
Details of Reasons for Soundness/ Legal Complaince:
Greater potential capacity to accommodate growth exists south of Hailsham than is being alluded to in this paragraph. This paragraph refers to the capped amount of development considered appropriate by the Environment Agency. No reference is made to the on-going study of this issue, the results of which may well enable the release of more land to the south of Hailsham thereby providing additional residential housing land as potentially available and as envisaged by the Panel reporting into the South East Plan (examination in public).

Details of Changes to be Made:
Paragraph 6.16 requires revision in the light of the completion of the study and the extended traffic modelling of additional site options not previously undertaken.

Details of Reasons for Soundness/ Legal Complaince:
Sewage capacity is insufficient to cope with any increased demand as noted on Page 39 point 6.16 and Page 41 Point 11 and also raised in Herstmonceux Parish Council's response to the Spatial Options Consultation in August 2009.

Details of Changes to be Made:
"Supplementary documents have been submitted but not attached, and may be viewed at the Council offices on request". Paragraph 6.16. The waste water treatment plants have been shown not to be a constraint

Details of Changes to be Made:
REVISION SOUGHT Delete.
Details of Reasons for Soundess/ Legal Complaince:
This huge increase of housing in this area is completely unsound as there is no rail service here. This will result in most journeys being made by car and so is unsustainable and contrary to the council's other policies. Whilst the council may say there is a rail service at Polegate this is some 7 or 8 miles away, and as already noted in that section, the station already has traffic and parking problems now, when most of the proposed housing in this South Wealden area has yet to be built. However if these allocations are to be kept it would show that WDC consider being within 7 or 8 miles away from a rail service is sustainable, and hence most areas in Wealden should therefore be accepted as sustainable since most areas are within 7 or 8 miles of a station. It is also contrary to planning policy and SHLAA to allocate land that is undeliverable. In this case there is insufficient sewage capacity, and the council have no idea how or if this can be overcome. The CS is supposed to provide certainly to development, not promote something that is completely uncertain. The comments in para. 6.20 are completely unacceptable in a CS. The above comment also applies to the identified highways problems. The council should know if they can overcome them or not now, leave it as a hope, which if it does not materialise will leave the allocations undeliverable at an unknown date in the future.

Details of Changes to be Made:
For the above reasons these allocations should be deleted and reallocated to deliverable site and sustainable areas.

Details of Reasons for Soundess/ Legal Complaince:
We support the Councils identification of an urban extension to the east of Hailsham to be commenced around 2017 as set out within SD2. The land is very logical and capable of supporting growth and can deliver the growth that the Council anticipates. We would however suggest, as with our earlier comments on policies WCS 1 and WCS 2 that additional growth should be planned for and with this in mind the land east of Hailsham has the ability to accommodate higher levels of growth than that presently planned for by the Council.

Details of Changes to be Made:
Details of Reasons for Soundess/ Legal Complaince:

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Details of Changes to be Made:

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Details of Reasons for Soundess/ Legal Complaince:

We support the Councils identification of an urban extension to the east of Hailsham to be commenced around 2017 as set out within SD2. The land is very logical and capable of supporting growth and can deliver the growth that the Council anticipates. We would however suggest, as with our earlier comments on policies WCS 1 and WCS 2 that additional growth should be planned for and with this in mind the land east of Hailsham has the ability to accommodate higher levels of growth than that presently planned for by the Council.

Details of Changes to be Made:

Amend Fig 7 in accordance with plan A-07-01.
Paragraph 6.19

Details of Reasons for Soundess/ Legal Complaince:

6.19 We support and emphasise the need for a gap between Hellingly and any northward extension of the urban area, and also around the Hellingly Hospital area, as further land may become available for building within that site. We also support the use of the A22 as the Western boundary for the urban area.

Details of Changes to be Made:

Paragraph

Sound  Yes  No  Justified  Effective  Consistent with national policy

Legally Compliant  Yes  No

Details of Reasons for Soundess/ Legal Complaince:

I agree that the Core Strategy is Legally Compliant and Sound, and I support its objectives.

Details of Changes to be Made:

Paragraph

Sound  Yes  No  Justified  Effective  Consistent with national policy

Legally Compliant  Yes  No

Details of Reasons for Soundess/ Legal Complaince:

As expressed earlier we feel that SD2 should be deleted if the housing figures remain at 9600. The 600 units proposed at SD2 should be re-distributed to land north of New Rd at Park farm (approx 65 hectares) This would allow for a comprehensive master planning including improving access and traffic movement at Bishop roundabout. It would enable the connectivity of the hospital site to the rest of Hailsham and provide a strategic gap in the form of a rural parkland. The concentration of development would provide an economy of scale with employment and other social and community infrastructure yet still maintaining an appropriate gap between Hellingly village and Hailsham. (See Plan sent under seperate cover)

Details of Changes to be Made:

Show extended area for possible development north of New Rd on Fig 7 with protential park land belt around hospital but with potential cycle and pedestrian links through SD3. Whilst at the same time reducing the area to the west to protect the Cookoo Trail and providing a greater gap between SD3 and Hellingly village to the west.
Details of Reasons for Soundess/ Legal Complaince:

Such talk of parks and 'quality of life' are fine words. Unfortunately fine words butter no parsnips. For realisation the never ending building activity should have been constrained within a long term plan. How would REAL PLANNING have placed a petrol station adjacent to a mini roundabout on a major traffic route serving the southern approaches to the town centre? I offer a short history lesson.......In 1970 a Hailsham Town Centre Map was approved for the purposes of development control by East Sussex County Council and ratified by the (then) Hailsham District Council. It featured a road system design aimed at increasing accessibility and aiding movement in and about the town. The redundant railway line and areas of the old Station yard were to form a two way road by passing the town centre. Further, a sensibly sized intersection with South Road ( on the same level! ) was proposed. The pedestrianised town centre, including the High Street, George Street and Market Street, would have been served by a one-way ring road. So, what happened? Other proposals for the immediate vicinity were the diversion of the A271 to form a northern by-pass and, after 1981, the extension of the new road along the railway cutting to Hellingly Station. This would have been matched with an improved South Road to form a viable route for north/south traffic meeting the A22.

Details of Changes to be Made:

It is contended that in presenting the Core Strategy for South East Hailsham that the Council have misdirected themselves on issues relevant to that area; have ignored the area owned by our client by this misdirection and as a consequence should include our client's land within the broad location area of South East Hailsham. Clearly, it is not at the present time. Our client's site was considered under the Strategic Housing Land Availability Assessment (SHLAA) under the reference number 379/1310. This indicated that 25 housing units could be delivered in the period up to 5 years and 209 after 6 years. The consideration was, at that stage, favourable. However in Development of the Proposed Core Strategy this location area has been largely included within other land around the Mill Road area and an area South of Hailsham. There is specific reference to the siting of the Wast Water Treatment Works, which would result in potential odour control issues. Clearly, land at Little Marshfoot Farm and Old Marshfoot Farm would not be affected by any potential odour control issues. It is not now, and, in any event any prevailing wind would carry any odour that may exist across the considerable area of residential areas before reaching Little Marshfoot Farm let alone Old Marshfoot Farm. If there are issues of odour control they exist now and will affect those properties at the western corner of the South East Hailsham Sector and will need to be resolved for the benefit of existing properties. The prevailing wind is from the South West. Further, consideration of the South East Hailsham Sector refers to the distance from the town centre. In fact Little Marshfoot Farm and Old Marshfoot Farm as submitted in the SHLAA Applications are closer to the town centre than the majority of the land highlighted as being South East Hailsham or South Hailsham. There is no published evidence to suggest that our client's land cannot deliver lower cost housing both by the marketplace and the mechanisms in place to deliver affordable housing. Our client would want to put the Wealden District Council to the task to demonstrate how they conclude that this area could not deliver the required housing at the lower end of the housing market or any other sector of the market.

Details of Changes to be Made:
Paragraph 6.19

### Details of Reasons for Soundess/ Legal Complaince:

Consequential changes to include reference to a South Hailsham urban extension following amendment / deletion of the Stone Cross urban extension

### Details of Changes to be Made:

Include at bullet point 3.: Around 300 homes within an extension to the urban area to the south of Hailsham (SD13) subject ot junction improvements (as agreed) to the Ersham Road / A295 junction and linkage to the Cuckoo Trail

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### Representation ID

1160

Person ID  
533827  
Mark Stephen Limited

Agent ID  
533824  
PHD Chartered Town Planners

Paragraph  
6.19

Sound  
☐ Yes  
☑ No  
☑ Justified  
☐ Effective  
☐ Consistent with national policy

Legally Compliant  
☑ Yes  
☐ No

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### Representation ID

787

Person ID  
106034  
Mr & Flittner

Agent ID  

Paragraph  
6.19

Sound  
☐ Yes  
☑ No  
☑ Justified  
☑ Effective  
☑ Consistent with national policy

Legally Compliant  
☐ Yes  
☐ No

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### Details of Reasons for Soundess/ Legal Complaince:

This huge increase of jousing in this area is completely unsound as there is no rail service here. This will result in most journeys being made by car and so is unsustainable and contrary to the council's other policies. Whilst the council may say there is a rail service at Polegate this is some 7 or 8 miles away, and as already noted in that section, the station already has traffic and parking problems now, when most of the proposed housing in this South Wealden area has yet to be built. However if these allocations are to be kept it would show that WDC consider being within 7 or 8 miles away from a rail service is sustainable, and hence most areas in Wealden should therefore be accepted as sustainable since most areas are within 7 or 8 miles of a station. It is also contrary to planning policy and SHLAA to allocate land that is undeliverable. In this case there is insufficient sewage capacity, and the council have no idea how or if this can be overcome. The CS is supposed to provide certainly to development, not promote something that is completely uncertain. The comments in para. 6.20 are completely unacceptable in a CS. The above comment also applies to the identified highways problems. The council should know if they can overcome them or not now, leave it as a hope, which if it does not materialise will leave the allocations undeliverable at an unknown date in the future.

### Details of Changes to be Made:

For the above reasons these allocations should be deleted and reallocated to deliverable site and sustainable areas.
Details of Reasons for Soundness/ Legal Compliance:
We support the Council's identification of an urban extension to the east of Hailsham to be commenced around 2017 as set out within SD2. The land is very logical and capable of supporting growth and can deliver the growth that the Council anticipates. We would however suggest, as with our earlier comments on policies WCS 1 and WCS 2 that additional growth should be planned for and with this in mind the land east of Hailsham has the ability to accommodate higher levels of growth than that presently planned for by the Council.

Details of Changes to be Made:

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Details of Reasons for Soundness/ Legal Compliance:
We support the council's identification of SD2 and the confirmation of details within paragraph 6.19 (3), specifically as it relates to the land identified under SHLAA reference 135/1310. The Council's background evidence, including the SHLAA and landscape study identify that the land is capable of accommodating development. The land is very sustainable and relates well to the existing built up boundary of Hailsham. The land is controlled by a single family, with Gleeson's having an interest in the land. It is deliverable and relates well to the other areas identified within the proposed policy within SD2. The land allows the deliverability of a not only housing, but supporting ancillary uses, whilst contributing to the councils overall Core Strategy aims. The council accepts the need for housing and indeed the need for housing at Hailsham, which we agree is a suitable location for development, and the land within SHLAA 135/1310 can go a long to achieving this.

Details of Changes to be Made:
Paragraph 6.19 reveals the underprovision of proposed residential development which is a contributory factor in the Core Strategy's failure to identify sufficient housing land within the Plan Period. For the reasons explained in other objections, the Trust considers that the Core Strategy has not adequately researched the full range of development options which could assist in delivering additional housing land. The Trust believes that the site selection process (albeit "broad locations") has been partially informed and that the research needed to fully test the available potential sites was not completed prior to the two broad locations being identified. This appears more a predetermined site selection process, evidenced by for instance the identification of SD2 (East of Hailsham) notwithstanding the acknowledgement that around 600 homes being planned for an extension to the east of Hailsham on land north of Vicarage Lane (SD2) may well be constrained by odour from sewage treatment plant and other physical infrastructure constraints. This is, in the Trust's view, therefore a premature identification of potential capacity in the absence of detailed study results. By contrast the land to the south of Hailsham (245/1310) was seemingly rejected for less onerous potentially constraining factors and suggests pre determination notwithstanding outstanding factual and informed analysis being incomplete.

Details of Changes to be Made:
The paragraph and related points require revision in the light of the completion of fully informed constraints analysis and an even-handed re evaluation of the potential development options.

Details of Reasons for Soundness/ Legal Complaince:
Policies to restrain traffic, obtain modal shift in travel, reducing need to travel and improve the experience of non-car travel need to be sharpened and focused. Aspirations for these to happen must have necessary circumstances incorporated into the policies.

Details of Changes to be Made:
Demand management techniques for traffic in Hailsham (6.15) should be included in all the related and equivalent policies. There should be a definite commitment to traffic reduction measures and targets throughout the Strategy Plan document.
Details of Reasons for Soundness/ Legal Compliance:
"Supplementary documents have been submitted but not attached, and may be viewed at the Council offices on request".

Details of Changes to be Made:
REVISION SOUGHT Increase overall number of dwellings to "at least 2,500". Increase the number of homes north of Hailsham and at hellingly to at least 1,300. Add a further bullet point and indicate development to accommodate at least 600 and amend Figure 7 accordingly.

Details of Reasons for Soundness/ Legal Compliance:
The proposals for further population growth at Hailsham including urban extensions east (Policy SD2) and north (Policy SD3) of Hailsham are supported. The proposals themselves will create critical mass to provide economic and social benefit to the town. To maintain the viability of such large scale development, care should be taken to avoid excessive development contributions and to adhere strictly to the principles of Circular 05/05 namely that obligations must be. 1. relevant to planning ii necessary to make the proposed development acceptable in planning terms iii. directly related to the proposed development iv. Fairly and reasonably related in scale and kind to the proposed development; and v. reasonable in all other respects. given the scale of development and the lead time to first occupations where significant infrastructure works are required the respective 2017 and 2021 dates should be brought forward and treated with flexibility to ensure that planning permissions are granted well in advance of those dates in order to ensure completions in good time and so maintain housing land supply.

Details of Changes to be Made:

Details of Reasons for Soundness/ Legal Compliance:
Sewage capacity is insufficient to cope with any increased demand as noted on Page 39 point 6.16 and Page 41 Point 11 and also raised in Herstmonceux Parish Council's response to the Spatial Options Consultation in August 2009.

Details of Changes to be Made:
Representation ID 1756
Person ID 106031
Agent ID 6.19
Sound ☐ Yes ☑ No ☐ Justified ☐ Effective ☑ Consistent with national policy
Legally Compliant ☐ Yes ☑ No

Details of Reasons for Soundness/ Legal Compliance:
SP07 Herstmonceux Parish Council expresses concern that the current public transport service to Herstmonceux is inadequate for residents as it only provides a limited hourly service. There are no buses in the evenings or on Sundays, and so it is not possible to reduce the need to travel by car. Page 41 6.19 (8) and (9)

Details of Changes to be Made:

Representation ID 1782
Person ID 334123
Agent ID 6.19
Sound ☐ Yes ☑ No ☑ Justified ☐ Effective ☑ Consistent with national policy
Legally Compliant ☑ Yes ☐ No

Details of Reasons for Soundness/ Legal Compliance:
6. Conclusion 6.1 The Core Strategy states in para. 6.18 that it aims ‘to help ensure that the aspirations of the Hellingly Parish Council / Hailsham Town Council Masterplan and the local community can be realised’. However, it has rejected a key component of that Masterplan which reflects local opinion. 6.2 The District Council fears that development to the east of Hailsham ‘could adversely affect the health objective due to the significant odour issues from waste water treatment works that would be likely to affect new residents on a prolonged basis’. However, no development is scheduled to commence before 2017 which allows a lengthy period for investigations to be made into improvement of the existing waste water treatment works or into an alternative locations. It is not yet a reason for proposing or accepting a second best solution. Annual Monitoring Reports will identify the need to review any elements of the Core Strategy where monitoring has identified a sustained failure to meet the targets set and this is just one of a whole range of viability and other issues which remain to be investigated. 6.3 The North Hailsham residential allocation is not consistent with government policy in that it will not provide for social inclusion and a sustainable community; would not enhance the physical environment by diverting the A271 traffic through an existing residential community; would not promote accessibility to jobs, shopping, leisure facilities and services by public transport, walking and cycling; and would not reduce the need to travel, especially by car.

Details of Changes to be Made:
6.4 It is submitted, therefore, that the Core Strategy is not sound in its present form because its proposal to site 700 additional dwellings to the north of the A271 rather than to the east of Hailsham is neither justified nor consistent with government policy. It is requested that this proposal be deleted and that, if necessary, the housing allocation to the east of Battle Road be increased from 600 to 1,300 dwellings.
Details of Reasons for Soundness/ Legal Compliance:

6. Conclusion 6.1 The Core Strategy states in para. 6.18 that it aims ‘to help ensure that the aspirations of the Hellingly Parish Council / Hailsham Town Council Masterplan and the local community can be realised’. However, it has rejected a key component of that Masterplan which reflects local opinion. 6.2 The District Council fears that development to the east of Hailsham ‘could adversely affect the health objective due to the significant odour issues from waste water treatment works that would be likely to affect new residents on a prolonged basis’. However, no development is scheduled to commence before 2017 which allows a lengthy period for investigations to be made into improvement of the existing waste water treatment works or into an alternative locations. It is not yet a reason for proposing or accepting a second best solution. Annual Monitoring Reports will identify the need to review any elements of the Core Strategy where monitoring has identified a sustained failure to meet the targets set and this is just one of a whole range of viability and other issues which remain to be investigated. 6.3 The North Hailsham residential allocation is not consistent with government policy in that it will not provide for social inclusion and a sustainable community; would not enhance the physical environment by diverting the A271 traffic through an existing residential community; would not promote accessibility to jobs, shopping, leisure facilities and services by public transport, walking and cycling; and would not reduce the need to travel, especially by car.

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Details of Reasons for Soundness/ Legal Compliance:

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Details of Changes to be Made:

6.4 It is submitted, therefore, that the Core Strategy is not sound in its present form because its proposal to site 700 additional dwellings to the north of the A271 rather than to the east of Hailsham is neither justified nor consistent with government policy. It is requested that this proposal be deleted and that, if necessary, the housing allocation to the east of Battle Road be increased from 600 to 1,300 dwellings.
Details of Reasons for Soundness/ Legal Compliance:
This huge increase of housing in this area is completely unsound as there is no rail service here. This will result in most journeys being made by car and so is unsustainable and contrary to the council's other policies. Whilst the council may say there is a rail service at Polegate this is some 7 or 8 miles away, and as already noted in that section, the station already has traffic and parking problems now, when most of the proposed housing in this South Wealden area has yet to be built. However if these allocations are to be kept it would show that WDC consider being within 7 or 8 miles away from a rail service is sustainable, and hence most areas in Wealden should therefore be accepted as sustainable since most areas are within 7 or 8 miles of a station. It is also contrary to planning policy and SHLAA to allocate land that is undeliverable. In this case there is insufficient sewage capacity, and the council have no idea how or if this can be overcome. The CS is supposed to provide certainty to development, not promote something that is completely uncertain. The comments in para. 6.20 are completely unacceptable in a CS. The above comment also applies to the identified highways problems. The council should know if they can overcome them or not now, leave it as a hope, which if it does not materialise will leave the allocations undeliverable at an unknown date in the future.

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Details of Changes to be Made:
Proposed Urban Extension in North & East Hailsham Planning Policy Statement 1 (PPS1), states that; ‘In preparing development plans, planning authorities should seek to: Reduce the need to travel... and focus development in existing centres and near to major public transport interchanges.’ The urban extension to north Hailsham (SD3) identified in the Figure 7 of the Proposed Submission Core Strategy (PSCS) is 1.95 km from the centre. Although the southern sections of the east extension (SD2) would be close to the town centre the northern sections would be approximately 2.2 km from the town centre. In contrast, southern sites identified as being suitable in the SHLAA (in particular Oaklands & The Brickfield SHLAA Ref 100/1310) are located 1.2 km from the town centre. This shorter distance means that trips into the town centre are much more likely to be undertaken on foot or bicycle rather than in a car. On this basis, the proposed residential development to Hailsham as identified in Figure 7 for the PSCS is contradictory to PPS1. This point was also highlighted by the Strategic Housing Land Availability Assessment. The site at Danecroft Nursery, Station Road, Hellingly and adjacent site at 13 Station Road, Hellingly are both within the north extension (SD3), and were deemed to be unsuitable for development by the SHLAA. This was because as stated; ‘These sites are relatively isolated and are remote from local services and facilities. They are disconnected from the boundary of Hailsham which is some distance away. Housing development would be unsustainable and would have the effect of consolidating a linear form of built development in this semi-rural location.’ PPS 1 states that; ‘In some circumstances, a planning authority may decide in reaching a decision to give different weight to social, environmental, resource or economic considerations. Where this is the case, the reasons for doing so should be explicit and the consequences considered.’ The various studies undertaken in preparation for the PSCS do not address this issue. No compensatory positive reason is given for the location of development so removed from the town centre. The evidence base study; ‘Landscape Character Assessment and Development Option Evaluation Study’ undertaken in 2009 in preparation for the PSCS states that; ‘Development of the northern fringes of Hailsham would be north of the A271 and isolated from the town.....’ The isolated nature of this development which is removed from the town centre of Hailsham contradicts guidance in PPS1. PPS1 states that Planning Authorities should; ‘ensure that the impact of development on the social fabric of communities is considered and taken into account’. Hailsham is more able to accommodate smaller sites to the south than larger sites to north and east. Flood Risk According to Figure 7 of the PSCS, sites identified to the north of communities is considered and taken into account’. Hailsham is more able to accommodate smaller sites to the north and east of Hailsham (SD2 and SD3) are positioned alongside a flood prone area. The Strategic Housing Land Availability Assessment (SHLAA) also points out that; ‘the eastern side of the north site are within Flood Zones 2 & 3’. PPS 1 states that ‘new development should be avoided in areas at risk of flooding’. Strategic Gap Section 3.10.7 of the ‘Landscape Character Assessment and Development Option Evaluation Study’ states that; ‘The countryside to the south of Ersham Road and Ingrams Way is more enclosed and has a stronger character than areas to the east. This is the strategic gap between Polegate and Hailsham and should be protected to prevent coalescence.’ The land south and west of Ersham Road is associated with previous use as a brickfield. There are a number of existing residential developments dotted around this area with the predominant use of the land being for horses and riding. There is existing residential development adjacent to the B2104 (Ersham Road) which is further south than southern sites identified as being suitable by the SHLAA. Development at this location would provide infill between this isolated area of housing and the existing south urban fringe of Hailsham. There is also additional existing development south of this site adjacent to the A22 (Woodside Way). It is therefore not accurate to say that development south of Ersham Road and Ingrams Way would reduce the strategic gap between Hailsham and Polgate. There is currently a gap of 2.5 km between the south side of Oaklands Farm & The Brickfield and the north edge of Polegate. This is a considerable distance. The proposed development of the northern sites such as those identified in Figure 7 of the PSCS would mean that the historic village of Hellingly would effectively become engulfed by Hailsham. Referring to the Hellingly Hospital site; Section 4.9.2 of the Landscape Character Assessment and Development Option Evaluation Study’ states that; ‘The consideration of this area as a new settlement should avoid coalescence between the settlements at north Hailsham and the village of Hellingly..... A new community in this area would need to include the areas to the north of Upper Horsebridge.’ Since the north extension (SD3) identified in Figure 7 of the PSCS would be located 350m from Hellingly, it seems clear that coalescence would occur between north Hailsham and the village of Hellingly. This seems to be a blatant contradiction to the aims of the Landscape Character Assessment and Development Option Evaluation Study. BP1: ‘Development of the Proposed Submission Core Strategy’ Document BP1: ‘Development of the Proposed Submission Core Strategy’ – February 2011’ section 8.21 refers to south sites indentified in the SHLAA as: ‘area with rural character compared to other broad locations. The access to the town centre, and the proximity
of the A22 would not provide a suitable alternative to car use, and compared to other broad locations would not benefit the town centre and the wider population to such degree. This assessment is not accurate. Access to the town centre from the identified south sites is superior to that of the north sites identified, with an existing bus stop located on the adjacent B2104 providing regular 3 minute shuttles directly to the town centre. The south sites are significantly closer to Hailsham town centre (1.2km rather than 2.2km) than the north sites identified in the SHLAA and increase the likelihood that this journey would be taken by bicycle or foot. Section 8.24 of Document BP1 provides an assessment of the north sites identified in the SHLAA, stating: ‘In order to maximise the use of existing waste water capacity the strategy is directed to north Hailsham.’ The SHLAA contradicts the above, stating that the northern site at Upper Horsebridge, Hailsham for 520 dwellings is currently not deliverable due to the current wastewater capacity constraints at Hailsham North Wastewater Treatment Works. With reference to the north site, Section 8.24 of Document BP1 goes on to state: ‘It is less sensitive in terms of landscape impact, provides an opportunity to consolidate development at Hellingly Hospital and has the necessary road linkages and ability to create mixed housing and employment areas. Provision of services in this location will not detract from the town centre and will help provide for the wider area, and allows for the provision of additional primary school places.’ The assessment states that development at this site would be less sensitive in terms of landscape impact despite being adjacent to the historic village of Hellingly containing several listed properties. It is also contrary to the Assessment made in 2001 in the then Local Plan Review Landscape Appraisal. Conclusion The PSCS has been prepared using flawed evidence base studies such as BP1: ‘Development of the Proposed Submission Core Strategy’ and the ‘Landscape Study’. The use of such studies has meant that the PSCS has not been able to provide the most appropriate strategy for development of sites surrounding Hailsham. The PSCS is not consistent with national policy document PPS1 in that the proposed residential development at Hailsham is not positioned close to the town centre and existing facilities. The Council has not been able to provide clear and convincing reasoning to justify the approach of positioning development to the North of Hailsham which is isolated from the town centre and does not comply with PPS1. The Oaklands and Brickfield site south of Hailsham (SHLAA 100/1300: 224 dwellings) is largely on previously-developed (brownfield) land and has a highways scheme to be paid for by the developers agreed with East Sussex County Council and should be included in the SDAs to the exclusion of less suitable development. It meets the Hailsham Sustainability Objectives, being a local Urban Extension within walking distance of Hailsham town centre and offering proximity to open space, woodland and biodiversity – at a scale capable of delivering up to 224 dwellings with minimum impact on infrastructure and environmental amenity.

Details of Changes to be Made:
Strategic Development north and east of Hailsham and at Polegate, Willingdon and Stonecross should be abandoned or reduced because of insufficient infrastructure and urban extensions should be added around the south side of Hailsham where there are reduced infrastructure constraints.

Representation ID
1612
Person ID Pelham Homes
107745
Agent ID Mrs Owen
102625
Jennifer Owen & Associates Ltd.
Paragraph 6.2
Sound □ Yes □ No □ Justified □ Effective □ Consistent with national policy
Legally Compliant □ Yes □ No
Details of Reasons for Soundess/ Legal Compliance:
"Supplementary documents have been submitted but not attached, and may be viewed at the Council offices on request". Paragraph 6.20: Infrastructure has not been shown to be a risk to development at Hailsham.

Details of Changes to be Made:
REVISION SOUGHT Delete paragraph
Summary of all Representations - Proposed Submission Core Strategy Regulation 27 - Report 11th July 2011

Representation ID
83
Person ID  Mr Mitchell
Agent ID
519614

Polegate and Willingdon Figure 8 and Stone Cross Area Strategy

Sound ☐ Yes ☑ No ☐ Justified ☑ Effective ☐ Consistent with national policy
Legally Compliant ☐ Yes ☐ No

Details of Reasons for Soundess/ Legal Complaince:
The infrastructure delivery is vague and uncertain. The core strategy infrastructure delivery plan states Transport, Education and Waste Water are all critical elements yet the status/timescale notes are very weak, not definitive and aspirational only. Waste Management includes the phrase "likely to" and implies co-operation from Eastbourne BC with no evidence of support from them. There is also no evidence of coherence with Eastbourne BC's strategies in the area.

Details of Changes to be Made:
Choosing a sounder expansion proposal within the area and adding robust solutions to critical items would help. Note I do not know whether I wish to participate or not at the oral examination, further details as to what is involved would be helpful.

Representation ID
260
Person ID  Miss Hunter
Agent ID
330812

Polegate and Willingdon Figure 8 and Stone Cross Area Strategy

Sound ☑ Yes ☐ No ☐ Justified ☐ Effective ☐ Consistent with national policy
Legally Compliant ☐ Yes ☐ No

Details of Reasons for Soundess/ Legal Complaince:
The Core Strategy is sound and sets out a justified and effective land use strategy for the Polegate area which is consistent with national planning policy. Policy WCS4, Strategic Development Areas, lists as Location SD4 'Land at South Polegate and East Willingdon'. Chapter 6, paragraphs 6.21 to 6.32 and Figure 8 (pages 43-46) show a clear and suitable set of proposals. There is to be no development west of Polegate; housing is proposed to be located in an urban extension south of Polegate and east of Willingdon (Hindslands and Mornings Mill). Paragraph 6.27 of the Core Strategy states: A site was allocated in the 2005 Non Statutory Wealden Local Plan for an urban extension to the north west of Polegate, in the vicinity of Honey Farm. However, this proposal was dependent upon the provision of the Folkington Link and other community infrastructure to enable the integration of development into the town. No such infrastructure has been provided or is known to be planned. Since this allocation the South Downs has achieved National Park status and the adjacent Wootton Manor has formally been included in the English Heritage register of Historic Parks and Gardens. This site has been re-assessed as part of SHLAA and is no longer considered suitable for housing. Paragraph 6.27 of the Core Strategy is strongly supported. The overwhelming arguments against the Honey Farm location have now been accepted by the District Council. These arguments are: The Honey Farm location would be in isolated development cut off by the A27 trunk road - the 'Folkington Link' no longer being in the trunk road programme; Foot and cycle access to the Honest Farm site would be permanently by footbridges and alleyways directly affecting residents in the Brookside Avenue area of Polegate; The Honey Farm location could not be integrated into the community of Polegate and would be a separate settlement; The setting of the South Downs National Park would be harmed; The setting of the adjacent historic property Wootton Manor, its park and garden would be damaged. The Core Strategy is justified in rejecting the Honey Farm location. The proposed housing location at Hindsland and Morning Mill is sound and justified.

Details of Changes to be Made:
Details of Reasons for Soundess/ Legal Complaince:
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Details of Changes to be Made:
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Details of Changes to be Made:

Yes

Sound

Justified

Effective

Consistent with national policy

Legally Compliant

Yes

No
Details of Reasons for Soundess/ Legal Complaince:
The Core Strategy is sound and sets out a justified and effective land use strategy for the Polegate area which is consistent with national planning policy. Policy WCS4, Strategic Development Areas, lists as Location SD4 'Land at South Polegate and East Willingdon'. Chapter 6, paragraphs 6.21 to 6.32 and Figure 8 (pages 43-46) show a clear and suitable set of proposals. There is to be no development west of Polegate; housing is proposed to be located in an urban extension south of Polegate and east of Willingdon (Hindslands and Mornings Mill). Paragraph 6.27 of the Core Strategy states: A site was allocated in the 2005 Non Statutory Wealden Local Plan for an urban extension to the north west of Polegate, in the vicinity of Honey Farm. However, this proposal was dependent upon the provision of the Folkington Link and other community infrastructure to enable the integration of development into the town. No such infrastructure has been provided or is known to be planned. Since this allocation the South Downs has achieved National Park status and the adjacent Wootton Manor has formally been included in the English Heritage register of Historic Parks and Gardens. This site has been re-assessed as part of SHLAA and is no longer considered suitable for housing. Paragraph 6.27 of the Core Strategy is strongly supported. The overwhelming arguments against the Honey Farm location have now been accepted by the District Council. These arguments are: The Honey Farm location would be in isolated development cut off by the A27 trunk road - the ‘Folkington Link’ no longer being in the trunk road programme; Foot and cycle access to the Honest Farm site would be permanently by footbridges and alleyways directly affecting residents in the Brookside Avenue area of Polegate; The Honey Farm location could not be integrated into the community of Polegate and would be a separate settlement; The setting of the South Downs National Park would be harmed; The setting of the adjacent historic property Wooton Manor, its park and garden would be damaged. The Core Strategy is justified in rejecting the Honey Farm location. The proposed housing location at Hindsland and Morning Mill is sound and justified.

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Details of Reasons for Soundness/ Legal Complaince:

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Details of Reasons for Soundess/ Legal Complaince:
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Details of Changes to be Made:

Represntation ID
685
Person ID Mr Beams
Agent ID
Woolingdon and Jevington Parish Council

Polegate and Willingdon Figure 8 and Stone Cross Area Strategy
Sound ☐ Yes ☐ No ☐ Justified ☐ Effective ☐ Consistent with national policy
Legally Compliant ☐ Yes ☐ No

Details of Reasons for Soundess/ Legal Complaince:
WJPC is concerned at the numerous references to Polegate and Willingdon as one settlement, as highlighted in 3.3 Table 1, 3.11, SPO6, WCS2, WCS3, 5.13, 6.31(2), Figure 8 and Figure 12. In particular, Figure 2 showing settlement hierarchy, places Polegate and Willingdon as one settlement, yet details other settlements individually.

Details of Changes to be Made:
### Representation ID
532

#### Person ID
Mrs Bartholomew

#### Agent ID
330714

#### Polegate and Willingdon Figure 8 and Stone Cross Area Strategy

#### Sound
- Yes
- No
- Yes
- No
- Justified
- Effective
- Consistent with national policy

#### Legally Compliant
- Yes
- No

### Details of Reasons for Soundess/ Legal Complaince:

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### Details of Changes to be Made:

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Details of Changes to be Made:
Details of Reasons for Soundess/ Legal Complaince:

The Core Strategy is sound and sets out a justified and effective land use strategy for the Polegate area which is consistent with national planning policy. Policy WCS4, Strategic Development Areas, lists as Location SD4 'Land at South Polegate and East Willingdon'. Chapter 6, paragraphs 6.21 to 6.32 and Figure 8 (pages 43-46) show a clear and suitable set of proposals. There is to be no development west of Polegate; housing is proposed to be located in an urban extension south of Polegate and east of Willingdon (Hindslands and Mornings Mill). Paragraph 6.27 of the Core Strategy states: A site was allocated in the 2005 Non Statutory Wealden Local Plan for an urban extension to the north west of Polegate, in the vicinity of Honey Farm. However, this proposal was dependent upon the provision of the Folkington Link and other community infrastructure to enable the integration of development into the town. No such infrastructure has been provided or is known to be planned. Since this allocation the South Downs has achieved National Park status and the adjacent Wootton Manor has formally been included in the English Heritage register of Historic Parks and Gardens. This site has been re-assessed as part of SHLAA and is no longer considered suitable for housing. Paragraph 6.27 of the Core Strategy is strongly supported. The overwhelming arguments against the Honey Farm location have now been accepted by the District Council. These arguments are: The Honey Farm location would be in isolated development cut off by the A27 trunk road - the ‘Folkington Link’ no longer being in the trunk road programme; Foot and cycle access to the Honest Farm site would be permanently by footbridges and alleyways directly affecting residents in the Brookside Avenue area of Polegate; The Honey Farm location could not be integrated into the community of Polegate and would be a separate settlement; The setting of the South Downs National Park would be harmed; The setting of the adjacent historic property Wootton Manor, its park and garden would be damaged. The Core Strategy is justified in rejecting the Honey Farm location. The proposed housing location at Hindsland and Morning Mill is sound and justified.

Details of Changes to be Made:

Yes

Sound  Yes  No  Justified  Effective  Consistent with national policy
Legally Compliant  Yes  No
The Core Strategy is sound and sets out a justified and effective land use strategy for the Polegate area which is consistent with national planning policy. Policy WCS4, Strategic Development Areas, lists as Location SD4 'Land at South Polegate and East Willingdon'. Chapter 6, paragraphs 6.21 to 6.32 and Figure 8 (pages 43-46) show a clear and suitable set of proposals. There is to be no development west of Polegate; housing is proposed to be located in an urban extension south of Polegate and east of Willingdon (Hindslands and Mornings Mill). Paragraph 6.27 of the Core Strategy states: A site was allocated in the 2005 Non Statutory Wealden Local Plan for an urban extension to the north west of Polegate, in the vicinity of Honey Farm. However, this proposal was dependent upon the provision of the Folkington Link and other community infrastructure to enable the integration of development into the town. No such infrastructure has been provided or is known to be planned. Since this allocation the South Downs has achieved National Park status and the adjacent Wootton Manor has formally been included in the English Heritage register of Historic Parks and Gardens. This site has been re-assessed as part of SHLAA and is no longer considered suitable for housing. Paragraph 6.27 of the Core Strategy is strongly supported. The overwhelming arguments against the Honey Farm location have now been accepted by the District Council. These arguments are: The Honey Farm location would be in isolated development cut off by the A27 trunk road - the 'Folkington Link' no longer being in the trunk road programme; Foot and cycle access to the Honest Farm site would be permanently by footbridges and alleyways directly affecting residents in the Brookside Avenue area of Polegate; The Honey Farm location could not be integrated into the community of Polegate and would be a separate settlement; The setting of the South Downs National Park would be harmed; The setting of the adjacent historic property Wooton Manor, its park and garden would be damaged. The Core Strategy is justified in rejecting the Honey Farm location. The proposed housing location at Hindsland and Morning Mill is sound and justified.

Details of Changes to be Made:

These allocations should be deleted and reallocated to deliverable and sustainable sites.
Details of Reasons for Soundness/ Legal Complaince:
The Core Strategy is sound and sets out a justified and effective land use strategy for the Polegate area which is consistent with national planning policy. Policy WCS4, Strategic Development Areas, list as Location SD4 ‘Land at South Polegate and East Willingdon’ Chapter 6, paragraphs 6.21 to 6.32 and Figure 8 (pages 43-46) show a clear and suitable set of proposals. There is to be no development west of Polegate; housing is proposed to be located in an urban extension south of Polegate and east of Willingdon (Hindslands and Mornings Mill). Paragraph 6.27 of the Core Strategy states: A site was allocated in the 2005 Non Statutory Wealden Local Plan for an urban extension to the north west of Polegate in the vicinity of Honey Farm. However, this proposal was dependent upon the provision of the Folkington Link and other community infrastructure to enable the integration of development into the town. No such infrastructure has been provided or is known to be planned. Since this allocation for South Downs has achieved National Park status and the adjacent Wootton Manor has formally been included in the English Heritage Register of Historic Parks and Gardens. This site has been re-assessed as part of SHLAA and is no longer considered suitable for housing. Figure 8 shows that the land west of Polegate north of the railway line will stay as open countryside adjacent to the National Park. Paragraph 6.27 of the Core Strategy is strongly supported. The Honey Farm of West of Polegate (Pelham Homes) site was included in the Non-Statutory Local Plan in 2004 but that Plan was never subject to a Public Inquiry. Those affected by the Honey Farm Site were not permitted in 2004-05 to oppose it by advancing a different location for the housing, as the opportunity to propose a different location was stated then to be given by the Local Development Framework process in 2005 - 07. That was delayed and this stage has only now been reached with this Core Strategy. The overwhelming arguments against the Honey Farm location have now been accepted by the District Council. These arguments are: 1. The Honey Farm location would be an isolated development cut off by the A27 trunk road - the ‘Folkington Link’ no longer being in the trunk road programme. 2. Foot and cycle access to the Honey Farm site would be permanently by footbridges and alleyways directly affecting residents in the Brookside Avenue area of Polegate. 3. The Honey Farm location could not be integrated into the community of Polegate and would be a separate settlement. 4. The setting of the South Downs National Park would be harmed. 5. The setting of the adjacent historic property Wootton Manor, its park and garden would be damaged. The Core Strategy is justified in rejecting the Honey Farm location. The proposed housing location at Hindsland and Mornings Mill is sound and justified. If that housing location does not prove to be the best site on further study, the preferred location for housing in the Polegate Town Council Masterplan should be chosen. This is the area north of Polegate and south of the A27 bypass which is also considered suitable in the 2010 Strategic Housing Lane Availability Assessment.

Details of Changes to be Made:

Yes  ☑  Sound  ☑  No  ☐  Justified  ☐  Effective  ☑  Consistent with national policy
Legally Compliant  ☐  Yes  ☐  No
## Details of Reasons for Soundness/ Legal Complaince:

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## Details of Changes to be Made:

- **Sound**: Yes
- **Legally Compliant**: Yes
Details of Reasons for Soundness/ Legal Complaince:
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Details of Changes to be Made:
Polegate and Willingdon Figure 8 and Stone Cross Area Strategy

Sound ☑ Yes ☐ No ☐ Justified ☐ Effective ☐ Consistent with national policy
Legally Compliant ☐ Yes ☐ No

Details of Reasons for Soundness/ Legal Complaince:
The Core Strategy is sound and sets out a justified and effective land use strategy for the Polegate area which is consistent with national planning policy. Policy WCS4, Strategic Development Areas, list as Location SD4 'Land at South Polegate and East Willingdon' Chapter 6, paragraphs 6.21 to 6.32 and Figure 8 (pages 43-46) show a clear and suitable set of proposals. There is to be no development west of Polegate; housing is proposed to be located in an urban extension south of Polegate and east of Willingdon (Hindslands and Mornings Mill). Paragraph 6.27 of the Core Strategy states: A site was allocated in the 2005 Non Statutory Wealden Local Plan for an urban extension to the north west of Polegate in the vicinity of Honey Farm. However, this proposal was dependent upon the provision of the Folkington Link and other community infrastructure to enable the integration of development into the town. No such infrastructure has been provided or is known to be planned. Since this allocation for South Downs has achieved National Park status and the adjacent Wootton Manor has formally been included in the English Heritage Register of Historic Parks and Gardens. This site has been re-assessed as part of SHLAA and is no longer considered suitable for housing. Figure 8 shows that the land west of Polegate north of the railway line will stay as open countryside adjacent to the National Park. Paragraph 6.27 of the Core Strategy is strongly supported. The Honey Farm of West of Polegate (Pelham Homes) site was included in the Non-Statutory Local Plan in 2004 but that Plan was never subject to a Public Inquiry. Those affected by the Honey Farm Site were not permitted in 2004-05 to oppose it by advancing a different location for the housing, as the opportunity to propose a different location was stated then to be given by the Local Development Framework process in 2005 - 07. That was delayed and this stage has only now been reached with this Core Strategy. The overwhelming arguments against the Honey Farm location have now been accepted by the District Council. These arguments are: 1. The Honey Farm location would be an isolated development cut off by the A27 trunk road - the 'Folkington Link' no longer being in the trunk road programme. 2. Foot and cycle access to the Honey Farm site would be permanently by footbridges and alleyways directly affecting residents in the Brookside Avenue area of Polegate. 3. The Honey Farm location could not be integrated into the community of Polegate and would be a separate settlement. 4. The setting of the South Downs National Park would be harmed. 5. The setting of the adjacent historic property Wootton Manor, its park and garden would be damaged. The Core Strategy is justified in rejecting the Honey Farm location. The proposed housing location at Hindsland and Mornings Mill is sound and justified. If that housing location does not prove to be the best site on further study, the preferred location for housing in the Polegate Town Council Masterplan should be chosen. This is the area north of Polegate and south of the A27 bypass which is also considered suitable in the 2010 Strategic Housing Lane Availability Assessment.

Details of Changes to be Made:
Details of Reasons for Soundness/ Legal Complaince:
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Details of Changes to be Made:

Sound ☑ Yes ☐ No ☐ Justified ☐ Effective ☐ Consistent with national policy
Legally Compliant ☐ Yes ☑ No
Details of Reasons for Soundess/ Legal Complaince:

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Details of Changes to be Made:

Yes
Sound
Justified
Effective
Consistent with national policy
Legally Compliant
Yes
No
Details of Reasons for Soundness/ Legal Complaince:
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Details of Changes to be Made:
Yes Sound
Yes Justified
Yes Effective
Yes Consistent with national policy

Legally Compliant
Yes
No
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Details of Reasons for Soundess/ Legal Complaince:

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Details of Changes to be Made:
Summary of all Representations - Proposed Submission Core Strategy Regulation 27 - Report 11th July 2011

Representation ID
959

Person ID  Miss Evans
Agent ID  522470

Polegate and Willingdon Figure 8 and Stone Cross Area Strategy

Details of Reasons for Soundess/ Legal Complaince:
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Details of Changes to be Made:

Sound  ☑ Yes  ☐ No  ☐ Justified  ☐ Effective  ☐ Consistent with national policy
Legally Compliant  ☐ Yes  ☐ No

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Details of Reasons for Soundess/ Legal Complaince:
The Core Strategy is sound and sets out a justified and effective land use strategy for the Polegate area which is consistent with national planning policy. Policy WCS4, Strategic Development Areas, lists as Location SD4 'Land at South Polegate and East Willingdon'. Chapter 6, paragraphs 6.21 to 6.32 and Figure 8 (pages 43-46) show a clear and suitable set of proposals. There is to be no development west of Polegate; housing is proposed to be located in an urban extension south of Polegate and east of Willingdon (Hindslands and Mornings Mill). Paragraph 6.27 of the Core Strategy states: A site was allocated in the 2005 Non Statutory Wealden Local Plan for an urban extension to the north west of Polegate in the vicinity of Honey Farm. However, this proposal was dependent upon the provision of the Folkington Link and other community infrastructure to enable the integration of development into the town. No such infrastructure has been provided or is known to be planned. Since this allocation for South Downs has achieved National Park status and the adjacent Wootton Manor has formally been included in the English Heritage Register of Historic Parks and Gardens. This site has been re-assessed as part of SHLAA and is no longer considered suitable for housing. Paragraph 6.27 of the Core Strategy is strongly supported. The overwhelming arguments against the Honey Farm Location have now been accepted by the District Council. these arguments are: 1. The Honey Farm location would be an isloated development cut off by the A27 trunk road - the 'Folkington Link' no longer being in the trunk road programme. 2. Foot and cycle access to the Honey Farm site would be permanently by footbridges and alleyways directly affecting residents in the Brookside Avenue area of Polegate. 3. The Honey Farm location could not be integrated into the community of Polegate and would be a separate settlement. 4. The setting of the South Downs National Park would be harmed. 5. The setting of the adjacent historic property Wootton Manor, its park and garden would be damaged. The Core Strategy is justified in rejecting the Honey Farm location. The proposed housing location at Hindsland and Mornings Mill is sound and justified.

Details of Changes to be Made:
Summary of all Representations - Proposed Submission Core Strategy Regulation 27 - Report 11th July 2011

Representation ID
1135

Person ID  Mr  Hayward
Agent ID  107124

Polegate and Willingdon Figure 8
and Stone Cross Area
Strategy

Sound  [✓]  Yes  [ ]  No  [ ]  Justified  [✓]  Effective  [ ]  Consistent with national policy
Legally Compliant  [ ]  Yes  [✓]  No

Details of Reasons for Soundess/ Legal Complaince:
The Core Strategy is sound and sets out a justified and effective land use strategy for the Polegate area which is consistent with national planning policy. Policy WCS4, Strategic Development Areas, lists as Location SD4 'Land at South Polegate and East Willingdon'. Chapter 6, paragraphs 6.21 to 6.32 and Figure 8 (pages 43-46) show a clear and suitable set of proposals. There is to be no development west of Polegate; housing is proposed to be located in an urban extension south of Polegate and east of Willingdon (Hindslands and Mornings Mill). Paragraph 6.27 of the Core Strategy states: A site was allocated in the 2005 Non Statutory Wealden Local Plan for an urban extension to the north west of Polegate in the vicinity of Honey Farm. However, this proposal was dependent upon the provision of the Folkington Link and other community infrastructure to enable the integration of development into the town. No such infrastructure has been provided or is known to be planned. Since this allocation for South Downs has achieved National Park status and the adjacent Wootton Manor has formally been included in the English Heritage Register of Historic Parks and Gardens. This site has been re-assessed as part of SHLAA and is no longer considered suitable for housing. Figure 8 Shows that the land west of Polegate north of the railway line will stay as open countryside adjacent to the National Park. Paragraph 6.27 of the Core Strategy is strongly supported. The Honey Farm or West of Polegate (Pelham Homes) site was included in the Non-Statutory Local Plan in 2004 but that Plan was never subject to a public inquiry. those affected by the Honey Farm site were not permitted in 2004-2005 to oppose it by advancing a different location for the housing, as the opportunity to propose a different location was stated then to be given by the Local Development Framework process in 2005-2007. That was delayed and this stage has only now been reached with this Core Strategy. The overwhelming arguments against the Honey Farm Location have now been accepted by the District Council. these arguments are: 1. The Honey Farm location would be an isolated development cut off by the A27 trunk road - the 'Folkington Link' no longer being in the trunk road programme. 2. Foot and cycle access to the Honey Farm site would be permanently by footbridges and alleyways directly affecting residents in the Brookside Avenue area of Polegate. 3. The Honey Farm location could not be integrated into the community of Polegate and would be a separate settlement. 4. The setting of the South Downs National Park would be harmed. 5. The setting of the adjacent historic property Wootton Manor, its park and garden would be damaged.

Details of Changes to be Made:

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Representation ID
1108

Person ID  Mr  Watkins
Agent ID  328932

Polegate and Willingdon Figure 8
and Stone Cross Area
Strategy

Sound  [ ]  Yes  [✓]  No  [ ]  Justified  [✓]  Effective  [ ]  Consistent with national policy
Legally Compliant  [ ]  Yes  [✓]  No

Details of Reasons for Soundess/ Legal Complaince:
The urban area shown green should include land which is allocated for development in the Non Statutory Local Plan to the north of Dittons Road, Polegate. Most of which now has planning consent. Accordingly Figure 8 should be amended as shown attached.

Details of Changes to be Made:
See attached amended Figure 8.
The Core Strategy is sound and sets out a justified and effective land use strategy for the Polegate area which is consistent with national planning policy. Policy WCS4, Strategic Development Areas, list as Location SD4 ‘Land at South Polegate and East Willingdon’ Chapter 6, paragraphs 6.21 to 6.32 and Figure 8 (pages 43-46) show a clear and suitable set of proposals. There is to be no development west of Polegate; housing is proposed to be located in an urban extension south of Polegate and east of Willingdon (Hindslands and Mornings Mill). Paragraph 6.27 of the Core Strategy states: A site was allocated in the 2005 Non Statutory Wealden Local Plan for an urban extension to the north west of Polegate in the vicinity of Honey Farm. However, this proposal was dependent upon the provision of the Folkington Link and other community infrastructure to enable the integration of development into the town. No such infrastructure has been provided or is known to be planned. Since this allocation for South Downs has achieved National Park status and the adjacent Wootton Manor has formally been included in the English Heritage Register of Historic Parks and Gardens. This site has been re-assessed as part of SHLAA and is no longer considered suitable for housing. Figure 8 shows that the land west of Polegate north of the railway line will stay as open countryside adjacent to the National Park. Paragraph 6.27 of the Core Strategy is strongly supported. The Honey Farm of West of Polegate (Pelham Homes) site was included in the Non-Statutory Local Plan in 2004 but that Plan was never subject to a Public Inquiry. Those affected by the Honey Farm Site were not permitted in 2004-05 to oppose it by advancing a different location for the housing, as the opportunity to propose a different location was stated then to be given by the Local Development Framework process in 2005 - 07. That was delayed and this stage has only now been reached with this Core Strategy. The overwhelming arguments against the Honey Farm location have now been accepted by the District Council. These arguments are: 1. The Honey Farm location would be an isolated development cut off by the A27 trunk road - the ‘Folkington Link’ no longer being in the trunk road programme. 2. Foot and cycle access to the Honey Farm site would be permanently by footbridges and alleyways directly affecting residents in the Brookside Avenue area of Polegate. 3. The Honey Farm location could not be integrated into the community of Polegate and would be a separate settlement. 4. The setting of the South Downs National Park would be harmed. 5. The setting of the adjacent historic property Wootton Manor, its park and garden would be damaged. The Core Strategy is justified in rejecting the Honey Farm location. The proposed housing location at Hindsland and Mornings Mill is sound and justified. If that housing location does not prove to be the best site on further study, the preferred location for housing in the Polegate Town Council Masterplan should be chosen. This is the area north of Polegate and south of the A27 bypass which is also considered suitable in the 2010 Strategic Housing Lane Availability Assessment.
The SWETS Report indicates that the north of Polegate location does not need additional transport infrastructure. The broad location south of Polegate / east of Willingdon was included and assessed in detail. The Bypass was opened in 2002. The Polegate Bypass has changed the landscape character of the land south of the CS para 6.30; but there is considerable concern at the impact of that location on local roads and junctions. 14. The transport assessment is stated to show that 700 dwellings and employment could be accommodated at that location large. 11. The north of Polegate locations has not been subject to a landscape appraisal since the A27 Polegate included this broad location could be served by the existing and committed transport infrastructure. 13. In Phase 3 suitable for development. Comparison of traffic impacts. 12. The South Wealden and Eastbourne Transport Study (SWETS) at Phase 1 included the land north of Polegate. Its general conclusion was that the scenarios that were selected as suitable in the Sustainability Appraisal of Plan Alternatives sets out the findings on the two broad locations in the summary table at p96, under 'Broad Locations Polegate'. Both 'North' and 'South Polegate and East Willingdon' are listed as 'selected'. 4. However, the Submitted Core Strategy approved for consultation in December 2010, the only option offered at Polegate as a broad location is the land south of Polegate and east of Willingdon (Hindslands and Mornings Mill). 5. The Sustainability Assessment (Background Paper 5) at pp39-41 analyses both the broad locations against a list of objectives the summary table (at p96) demonstrates that both perform sufficiently well to meet the aims of the Strategy. A detailed response on the Sustainability Assessment entries for Polegate broad locations is attached at Appendix 1. 6. The Core Strategy at para 6.30 does not give adequate reasons, or justify, the choice of the broad location south of Polegate / east of Willingdon over the alternative location north of Polegate. It states only that the Sustainability Appraisal 'favoured' the former. 7. the south of Polegate / east of Willingdon location needs to be compared with the alternative north of Polegate location in terms of: a. the preference of local opinion b. the effect on local, and nationally important, landscape c. the traffic impact. Local Opinion 8. The Polegate Town Masterplan supports the north of Polegate location. The Background Paper 'Summary of Town Masterplanning documents' at pp15-17, Polegate Masterplan, states (para 6.10): Polegate Town Council supports the 'suitable' sites identified in the SHLAA with the proviso that Hindslands Fields Eastbourne Road should only be considered for the provision of a new educational facility and not housing. Future development should only take place south of the A27 Bypass and should include a good mix of dwellings and should be of appropriate design to fit in with the existing character of the area. 9. The Government policy principle of localism, which aims to give weight to local opinion and allow local people to determine the future for their area, supports giving weight to the local council's preference for the north of Polegate location for new housing instead of the south of Polegate (Hindslands Fields) site. Comparison of impacts on local and national important landscape 10. The landscape impact of the north of Polegate location would be less than that of the south of Polegate / east of Willingdon alternative. It would be out of view of the South Downs; whereas the south of Polegate / east of Willingdon location would be highly visible from the publicly-owned and accessible Coombe Hill. the impact on the views from and setting of the National Park would be negligible; the impact of the south of Polegate / east of Willingdon location on these views and settings would be large. 11. the north of Polegate locations has not been subject to a landscape appraisal since the A27 Polegate Bypass was opened in 2002. The Polegate Bypass has changed the landscape character of the land south of the bypass. Mounding and planting have created an enclosed area which is not easily visible from the surrounding countryside. In the decade since the bypass was completed, the land has become well-screened and more suitable for development. Comparison of traffic impacts. 12. The South Wealden and Eastbourne Transport Study (SWETS) at Phase 1 included the land north of Polegate. Its general conclusion was that the scenarios that included this broad location could be served by the existing and committed transport infrastructure. 13. In Phase 3 of SWETS the broad location south of Polegate / east of Willingdon was included and assessed in detail. The transport assessment is stated to show that 700 dwellings and employment could be accommodated at that location (CS para 6.30); but there is considerable concern at the impact of that location on local roads and junctions. 14. The SWETS Report indicates that the north of Polegate location does not need additional transport infrastructure of the same type. It would thus be more effective and justified in transport terms than the south of Polegate / east of Willingdon location, which would add to problems on the local road system. Lack of public participation 15. there was no public participation on the choice of broad house location at Polegate before the Submission Core Strategy was approved and published. Local opinion should be consulted on the choice between the two broad locations which were selected as suitable in the Sustainability Appraisal of Plan Alternatives. 16. the principle of locating some 700 house at Polegate should be included in the Core Strategy as sound; the choice between the two locations assessed should be made through a Strategic Sites Development Plan Document which should follow the Core Strategy.
Details of Changes to be Made:

17. The Draft Proposed Submission Core Strategy Policy WCS4 (p40) lists location SD4 as 'Land at Polegate/Willingdon'. This is the wording that should be restored to the text of the Core Strategy to make it sound.

18. Figure 8 should be amended to delete the broad location notation (red colour) at the south of Polegate / east of Willingdon location; the notation in the October 2010 draft Core Strategy Fig 8 should be restored to indicate that both north of Polegate and south of Polegate / east of Willingdon locations are potential strategic housing locations.

Representation ID

1091

Person ID May

333548

Agent ID

Polegate and Willingdon Figure 8
and Stone Cross Area
Strategy

Sound ☑ Yes ☐ No ☐ Justified ☐ Effective ☐ Consistent with national policy

Legally Compliant ☐ Yes ☑ No

Details of Reasons for Soundess/ Legal Complaince:

The Core Strategy is sound and sets out a justified and effective land use strategy for the Polegate area which is consistent with national planning policy. Policy WCS4, Strategic Development Areas, list as Location SD4 'Land at South Polegate and East Willingdon' Chapter 6, paragraphs 6.21 to 6.32 and Figure 8 (pages 43-46) show a clear and suitable set of proposals. There is to be no development west of Polegate; housing is proposed to be located in an urban extension south of Polegate and east of Willingdon (Hindslands and Mornings Mill). Paragraph 6.27 of the Core Strategy states: A site was allocated in the 2005 Non Statutory Wealden Local Plan for an urban extension to the north west of Polegate in the vicinity of Honey Farm. However, this proposal was dependent upon the provision of the Folkington Link and other community infrastructure to enable the integration of development into the town. No such infrastructure has been provided or is known to be planned. Since this allocation for South Downs has achieved National Park status and the adjacent Wootton Manor has formally been included in the English Heritage Register of Historic Parks and Gardens. This site has been re-assessed as part of SHLAA and is no longer considered suitable for housing. Figure 8 shows that the land west of Polegate north of the railway line will stay as open countryside adjacent to the National Park. Paragraph 6.27 of the Core Strategy is strongly supported. The Honey Farm of West of Polegate (Pelham Homes) site was included in the Non-Statutory Local Plan in 2004 but that Plan was never subject to a Public Inquiry. Those affected by the Honey Farm Site were not permitted in 2004-05 to oppose it by advancing a different location for the housing, as the opportunity to propose a different location was stated then to be given by the Local Development Framework process in 2005 - 07. That was delayed and this stage has only now been reached with this Core Strategy. The overwhelming arguments against the Honey Farm location have now been accepted by the District Council. These arguments are: 1. The Honey Farm location would be an isolated development cut off by the A27 trunk road - the 'Folkington Link' no longer being in the trunk road programme. 2. Foot and cycle access to the Honey Farm site would be permanently by footbridges and alleyways directly affecting residents in the Brookside Avenue area of Polegate. 3. The Honey Farm location could not be integrated into the community of Polegate and would be a separate settlement. 4. The setting of the South Downs National Park would be harmed. 5. The setting of the adjacent historic property Wootton Manor, its park and garden would be damaged. The Core Strategy is justified in rejecting the Honey Farm location. The proposed housing location at Hindsland and Mornings Mill is sound and justified. If that housing location does not prove to be the best site on further study, the preferred location for housing in the Polegate Town Council Masterplan should be chosen. This is the area north of Polegate and south of the A27 bypass which is also considered suitable in the 2010 Strategic Housing Lane Availability Assessment.

Details of Changes to be Made:
Details of Reasons for Soundness/ Legal Compliance:
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Details of Changes to be Made:
Summary of all Representations - Proposed Submission Core Strategy Regulation 27 - Report 11th July 2011

Representation ID
1079

Person ID  Mrs Nevill  Agent ID
522487

Polegate and Willingdon Figure 8 and Stone Cross Area Strategy

Sound  ✓ Yes  ☐ No  ☐ Justified  ☐ Effective  ☐ Consistent with national policy
Legally Compliant  ☐ Yes  ☐ No

Details of Reasons for Soundess/ Legal Complaince:
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Details of Changes to be Made:

Sound  ☑ Yes   ☐ No   ☐ Justified   ☐ Effective   ☐ Consistent with national policy

Legally Compliant  ☐ Yes   ☐ No
Details of Reasons for Soundness/ Legal Complaince:

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Details of Changes to be Made:

- Sound: Yes
- Legally Compliant: Yes

Summary of all Representations - Proposed Submission Core Strategy Regulation 27 - Report 11th July 2011
Details of Reasons for Soundness/ Legal Compliance:
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</table>
Details of Reasons for Soundess/ Legal Complaince:
The Core Strategy is sound and sets out a justified and effective land use strategy for the Polegate area which is consistent with national planning policy. Policy WCS4, Strategic Development Areas, lists as Location SD4 'Land at South Polegate and East Willingdon'. Chapter 6, paragraphs 6.21 to 6.32 and Figure 8 (pages 43-46) show a clear and suitable set of proposals. There is to be no development west of Polegate; housing is proposed to be located in an urban extension south of Polegate and east of Willingdon (Hindslands and Mornings Mill). Paragraph 6.27 of the Core Strategy states: A site was allocated in the 2005 Non Statutory Wealden Local Plan for an urban extension to the north west of Polegate in the vicinity of Honey Farm. However, this proposal was dependent upon the provision of the Folkington Link and other community infrastructure to enable the integration of development into the town. No such infrastructure has been provided or is known to be planned. Since this allocation for South Downs has achieved National Park status and the adjacent Wootton Manor has formally been included in the English Heritage Register of Historic Parks and Gardens. This site has been re-assessed as part of SHLAA and is no longer considered suitable for housing. Paragraph 6.27 of the Core Strategy is strongly supported. The overwhelming arguments against the Honey Farm Location have now been accepted by the District Council. These arguments are: 1. The Honey Farm location would be an isolated development cut off by the A27 trunk road - the 'Folkington Link' no longer being in the trunk road programme. 2. Foot and cycle access to the Honey Farm site would be permanently by footbridges and alleyways directly affecting residents in the Brookside Avenue area of Polegate. 3. The Honey Farm location could not be integrated into the community of Polegate and would be a separate settlement. 4. The setting of the South Downs National Park would be harmed. 5. The setting of the adjacent historic property Wootton Manor, its park and garden would be damaged. The Core Strategy is justified in rejecting the Honey Farm location. The proposed housing location at Hindslands and Mornings Mill is sound and justified.

Details of Changes to be Made:
Details of Reasons for Soundess/ Legal Complaince:

1.1 We object to the Core Strategy Figure 8, this should show the urban extension land east and south east of Stone Cross (SD6) (residential) as extending north to Peelings Lane. This would ensure that the Core Strategy was sound by being the most appropriate strategy when considered against the reasonable alternatives and was sound by being flexible.

1.2 We note the comment in paragraph 5.10 that the exact extent and detailed form of the developments at a part of the strategic development areas will be precisely defined in the Site Allocations DPDs. However the Core Strategy in Figure 8 is not consistent with Figure 4 of the Wealden District Council document Development of the Proposed Submission Core Strategy Background Paper dated February 2011. This shows a similar plan of the urban extensions around Stone Cross, but in the Background paper the East Stone Cross urban extension extends north to Peelings Lane. Paragraph 8.38 of the Background Paper describes the East Stone Cross land as "well related to Eastbourne and Dittons Road, the main road running through Stone Cross. The potential extension of the urban form here is seen as a natural extension to an essentially sustainable location".

1.3 The Core Strategy should set out "clear and concise policies for delivering the strategy" (Planning Policy Statement 12 (PPS12) paragraph 2.12). the neighbouring Urban Extension north of Stone Cross (SD7) (residential) which is also shown in Figure 8 of the Core Strategy shows more clearly defined boundaries being the urban area or roads. Urban Extension SD6 should be similarly defined as at present it includes half of the field immediately to the south of Peelings Lane. The red shading should therefore extend further north to Peelings Lane and the A27. This would give the Core Strategy more flexibility by including more developable land in the urban extension.

1.4 At present the urban extension SD6 extends south below the railway line. The railway line may be a constraint to development preventing north south movement. Extending the urban extension north would provide more flexibility in the master planning stage and this change to the Core Strategy would not prejudice future decisions in the Strategic Site Allocations DPD but would provide more flexibility for this DPD. 1.5 Extending SD6 northwards would ensure that the area identified for the urban extension included all of a field some 4.25 hectares in size which is shown as the eastern most field edged red on the attached plan. This field has Peelings Lane to the North and is surrounded by belts of mature planting except for part of its southern boundary. Through its western boundary part of the 1998 Local Plan allocations built out in Stone Cross is visible, this gives the field a visual connection to the existing built up area. The A27 north of the site is well screened by trees and is in a cutting which will mitigate traffic noise. There is space to include additional noise mitigation if required. There are views into the site from the east however, any development on the site will be seen in the context of the existing development of Stone Cross and development to the south on the B2447 Dittons Road.

1.6 A significant advantage of including this field in the urban extension which currently in agricultural use is the benefit it would bring to master planning in the area. The inclusion of the field would provide a good link to Peelings Lane which is a well used footpath in the area. As currently drafted the Core Strategy would include part of the field in the urban extension and part outside it which would create problems of framing the land in the future and would leave an awkward area of land between urban development and the A27 which would make it unsuitable for agriculture.

Details of Changes to be Made:
The Core Strategy Figure 8 red shaded area showing the Urban Extension land east and south of Stone Cross (SD6) (residential) should be extented north as shown in the Figure 4 (page 54) of the February 2011 Development of the Proposed Submission Core Strategy Background Paper.
Details of Reasons for Soundess/ Legal Complaince:
The removal of Stone Cross located land to prevent coalescence of settlements and to assist in delivery of housing in a sustainable and managed pattern that reflects the existing pattern of settlements would require the removal of at least part of SD7 from the Polegate and Stone Cross inset. Stone Cross has been incorrectly classified as a Service Centre and no regard has been made to settlement coalescence.

Details of Changes to be Made:
The designation of a South Hailsham urban extension that replaces part of the Stone Cross area as well as balancing the extension of the town to the north with development both closer to and more accessible to the town centre and employment areas.

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Details of Reasons for Soundess/ Legal Complaince:
Details of Changes to be Made:

Fig 8 We support the provision of a significant green gap between Polegate and Hailsham, and the use of the A22 as a clear western boundary for expansion. We also support the expansion of Stone Cross, but would wish to see a designated green gap to the east of Stone Cross providing clear separation from Westham.

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Details of Reasons for Soundess/ Legal Complaince:
Details of Changes to be Made:

No change required

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Details of Reasons for Soundess/ Legal Complaince:
Details of Changes to be Made:

Support Core Strategy
Representation ID 1618

Person ID 107745

Agent ID 102625

Pelham Homes

Jennifer Owen & Associates Ltd.

Polegate and Willingdon Figure 8 and Stone Cross Area Strategy

Sound ☑ No ☐ Justified ☐ Effective ☐ Consistent with national policy

Legally Compliant ☐ Yes ☐ No

Details of Reasons for Soundess/ Legal Complaince:
"Supplementary documents have been submitted but not attached, and may be viewed at the Council offices on request".

Details of Changes to be Made:
REVISION SOUGHT: Amend in accordance with revised paragraph 6.31.

Representation ID 1597

Person ID 522137

Agent ID Polegate Town Council

Ognjanovic Polegate and Willingdon Figure 8 and Stone Cross Area Strategy

Sound ☐ Yes ☑ No ☐ Justified ☐ Effective ☐ Consistent with national policy

Legally Compliant ☐ Yes ☐ No

Details of Reasons for Soundess/ Legal Complaince:
Concern raised at the reference to Polegate and Willingdon as one settlement

Details of Changes to be Made:
Details of Reasons for Soundness/ Legal Compliance:
The Core Strategy is sound and sets out a justified and effective land use strategy for the Polegate area which is consistent with national planning policy. Policy WCS4, Strategic Development Areas, lists as Location SD4 'Land at South Polegate and East Willingdon'. Chapter 6, paragraphs 6.21 to 6.32 and Figure 8 (pages 43-46) show a clear and suitable set of proposals. There is to be no development west of Polegate; housing is proposed to be located in an urban extension south of Polegate and east of Willingdon (Hindslands and Mornings Mill). Paragraph 6.27 of the Core Strategy states: A site was allocated in the 2005 Non Statutory Wealden Local Plan for an urban extension to the north west of Polegate, in the vicinity of Honey Farm. However, this proposal was dependent upon the provision of the Folkington Link and other community infrastructure to enable the integration of development into the town. No such infrastructure has been provided or is known to be planned. Since this allocation the South Downs has achieved National Park status and the adjacent Wootton Manor has formally been included in the English Heritage register of Historic Parks and Gardens. This site has been re-assessed as part of SHLAA and is no longer considered suitable for housing. Paragraph 6.27 of the Core Strategy is strongly supported. The overwhelming arguments against the Honey Farm location have now been accepted by the District Council. These arguments are: The Honey Farm location would be in isolated development cut off by the A27 trunk road - the 'Folkington Link' no longer being in the trunk road programme; Foot and cycle access to the Honest Farm site would be permanently by footbridges and alleyways directly affecting residents in the Brookside Avenue area of Polegate; The Honey Farm location could not be integrated into the community of Polegate and would be a separate settlement; The setting of the South Downs National Park would be harmed; The setting of the adjacent historic property Wooton Manor, its park and garden would be damaged. The Core Strategy is justified in rejecting the Honey Farm location. The proposed housing location at Hindsland and Morning Mill is sound and justified.

Details of Changes to be Made:
Details of Reasons for Soundness/ Legal Complaince:
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Details of Changes to be Made:
Summary of all Representations - Proposed Submission Core Strategy Regulation 27 - Report 11th July 2011

Representation ID
220

Person ID                      521466
Sherwood                      Agent ID
6.21

Paragraph 6.21

Sound           Yes
Justified        No
Effective         No
Consistent with national policy

Legally Compliant
Yes
No

Details of Reasons for Soundess/ Legal Complaince:
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Details of Reasons for Soundess/ Legal Complaince:
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Details of Reasons for Soundess/ Legal Complaince:
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Details of Changes to be Made:
Representation ID
548
Person ID Mr Hollis
Agent ID 522177

Paragraph 6.21

Details of Reasons for Soundess/ Legal Complaince:
The Core Strategy is sound and sets out a justified and effective land use strategy for the Polegate area which is consistent with national planning policy. Policy WCS4, Strategic Development Areas, lists as Location SD4 'Land at South Polegate and East Willingdon'. Chapter 6, paragraphs 6.21 to 6.32 and Figure 8 (pages 43-46) show a clear and suitable set of proposals. There is to be no development west of Polegate; housing is proposed to be located in an urban extension south of Polegate and east of Willingdon (Hindslands and Mornings Mill). Paragraph 6.27 of the Core Strategy states: A site was allocated in the 2005 Non Statutory Wealden Local Plan for an urban extension to the north west of Polegate, in the vicinity of Honey Farm. However, this proposal was dependent upon the provision of the Folkington Link and other community infrastructure to enable the integration of development into the town. No such infrastructure has been provided or is known to be planned. Since this allocation the South Downs has achieved National Park status and the adjacent Wootton Manor has formally been included in the English Heritage register of Historic Parks and Gardens. This site has been re-assessed as part of SHLAA and is no longer considered suitable for housing. Paragraph 6.27 of the Core Strategy is strongly supported. The overwhelming arguments against the Honey Farm location have now been accepted by the District Council. These arguments are: The Honey Farm location would be in isolated development cut off by the A27 trunk road - the 'Folkington Link' no longer being in the trunk road programme; Foot and cycle access to the Honest Farm site would be permanently by footbridges and alleyways directly affecting residents in the Brookside Avenue area of Polegate; The Honey Farm location could not be integrated into the community of Polegate and would be a separate settlement; The setting of the South Downs National Park would be harmed; The setting of the adjacent historic property Wooton Manor, its park and garden would be damaged. The Core Strategy is justified in rejecting the Honey Farm location. The proposed housing location at Hindsland and Morning Mill is sound and justified.

Details of Changes to be Made:

Yes
Sound

Justified
Effective
Consistent with national policy

Legally Compliant
Yes
No
Details of Reasons for Soundess/ Legal Complaince:
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Details of Changes to be Made:

Yes  Sound  No  Justified  No  Effective  No  Consistent with national policy

Legally Compliant  Yes  No
Details of Reasons for Soundness/ Legal Compliance:
The Core Strategy is sound and sets out a justified and effective land use strategy for the Polegate area which is consistent with national planning policy. Policy WCS4, Strategic Development Areas, lists as Location SD4 'Land at South Polegate and East Willingdon'. Chapter 6, paragraphs 6.21 to 6.32 and Figure 8 (pages 43-46) show a clear and suitable set of proposals. There is to be no development west of Polegate; housing is proposed to be located in an urban extension south of Polegate and east of Willingdon (Hindslands and Mornings Mill). Paragraph 6.27 of the Core Strategy states: A site was allocated in the 2005 Non Statutory Wealden Local Plan for an urban extension to the north west of Polegate, in the vicinity of Honey Farm. However, this proposal was dependent upon the provision of the Folkington Link and other community infrastructure to enable the integration of development into the town. No such infrastructure has been provided or is known to be planned. Since this allocation the South Downs has achieved National Park status and the adjacent Wootton Manor has formally been included in the English Heritage register of Historic Parks and Gardens. This site has been re-assessed as part of SHLAA and is no longer considered suitable for housing. Paragraph 6.27 of the Core Strategy is strongly supported. The overwhelming arguments against the Honey Farm location have now been accepted by the District Council. These arguments are: The Honey Farm location would be in isolated development cut off by the A27 trunk road - the 'Folkington Link' no longer being in the trunk road programme; Foot and cycle access to the Honest Farm site would be permanently by footbridges and alleyways directly affecting residents in the Brookside Avenue area of Polegate; The Honey Farm location could not be integrated into the community of Polegate and would be a separate settlement; The setting of the South Downs National Park would be harmed; The setting of the adjacent historic property Wooton Manor, its park and garden would be damaged. The Core Strategy is justified in rejecting the Honey Farm location. The proposed housing location at Hindsland and Morning Mill is sound and justified.

Details of Changes to be Made:
Paragraph 6.21

Details of Reasons for Soundess/ Legal Complaince:
Paragraphs 6.21 - 6.30 of the document provide further information to support the Council's policy approach towards further development at Stone Cross and this is supported. Text at paragraph 6.31 identifies the potential split in housing delivery between the two strategic development areas of Stone Cross (SD6 and SD7) although it is noted that there is flexibility here subject to the local highway improvements required to accommodate the development. This flexibility within the overall strategy to deal with changing circumstances is welcomed and is considered to ensure the Core Strategy is effective in line with the requirements of paragraphs 4.44 and 4.46 of PPS12. Sites north of Rattle Road, east of Stone Cross within SD6 have been determined within the SHLAA to be deliverable housing sites. It is acknowledged that the development of these sites would have a limited impact on the landscape and that structural planning can mitigate any local impact as well as protect against potentially conflicting land uses. Between the two sites in the SHLAA east of Stone Cross, north of Rattle Road, the landowners are collaborating with regard to access and evidence of this will be forwarded to the District council in due course. Likewise, a Phase 1 Habitats Survey has been commissioned to support the general masterplan development of this location and again this will be forwarded to the Council following its completion to provide further evidence of the suitability of this location for development. As the Council will be aware, my client's land (The Oaks, Rattle Road - SLHAA ref: 415/3280) fronts directly onto Rattle Road, is in the control of one single landowner, can be brought forward for development at any time and to the best of our knowledge is free from any environmental constraint. In this respect, we consider its inclusion within the identified SD6 Strategic Development Area is sensible and reflects a sound approach that will contribute to ensuring the Core Strategy is deliverable, founded on a robust and credible evidence base and is the most appropriate strategy when considered against the reasonable alternatives. The Council has engaged with the community in its consultations on the Issues and Options Paper 2007 and the Spatial Development Options Consultation in 2009. The comments from these consultations, particularly with regard to the need for affordable housing, have been reflected in the emerging policies. We are also aware that the Council continues to engage with Parish Councils in the area, including Jevington and Westham Parish Councils, to help reflect their vision for the settlements and service provision. As a result I agree that the Core Strategy is generally sound (subject to my comments concerning Policy WCS1), and demonstrates effectiveness in the delivery of development in this part of the District. I therefore consider Strategic Development Area SD6 in the Proposed Submission Core Strategy to be 'sound' in terms of the tests in Planning Policy Statement 12. I consider it justified, based on credible and robust evidence and effective with regard to delivery and flexibility and is consistent with national policy.

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The Core Strategy is sound and sets out a justified and effective land use strategy for the Polegate area which is consistent with national planning policy. Policy WCS4, Strategic Development Areas, lists as Location SD4 'Land at South Polegate and East Willingdon'. Chapter 6, paragraphs 6.21 to 6.32 and Figure 8 (pages 43-46) show a clear and suitable set of proposals. There is to be no development west of Polegate; housing is proposed to be located in an urban extension south of Polegate and east of Willingdon (Hindslands and Mornings Mill). Paragraph 6.27 of the Core Strategy states: A site was allocated in the 2005 Non Statutory Wealden Local Plan for an urban extension to the north west of Polegate in the vicinity of Honey Farm. However, this proposal was dependent upon the provision of the Folkington Link and other community infrastructure to enable the integration of development into the town. No such infrastructure has been provided or is known to be planned. Since this allocation for South Downs has achieved National Park status and the adjacent Wootton Manor has formally been included in the English Heritage Register of Historic Parks and Gardens. This site has been re-assessed as part of SHLAA and is no longer considered suitable for housing. Paragraph 6.27 of the Core Strategy is strongly supported. The overwhelming arguments against the Honey Farm Location have now been accepted by the District Council. these arguments are: 1. The Honey Farm location would be an isolated development cut off by the A27 trunk road - the 'Folkington Link' no longer being in the trunk road programme. 2. Foot and cycle access to the Honey Farm site would be permanently by footbridges and alleyways directly affecting residents in the Brookside Avenue area of Polegate. 3. The Honey Farm location could not be integrated into the community of Polegate and would be a separate settlement. 4. The setting of the South Downs National Park would be harmed. 5. The setting of the adjacent historic property Wootton Manor, its park and garden would be damaged. The Core Strategy is justified in rejecting the Honey Farm location. The proposed housing location at Hindsland and Mornings Mill is sound and justified.

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Details of Changes to be Made:
Summary of all Representations - Proposed Submission Core Strategy Regulation 27 - Report 11th July 2011

Representation ID
759

Person ID  Ms  Horton  Agent ID
522485

Paragraph  6.21

Sound  Yes  No  Justified  Effective  Consistent with national policy

Legally Compliant  Yes  No

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Details of Changes to be Made:

Yes  Sound
No  Justified
Yes  Effective
No  Consistent with national policy

Legally Compliant
Yes  No
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Details of Reasons for Soundess/ Legal Complaince:
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Details of Changes to be Made:
Paragraph 6.21

Details of Reasons for Soundness/ Legal Compliance:

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Details of Changes to be Made:
Details of Reasons for Soundness/ Legal Complaint:
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Details of Changes to be Made:
Details of Reasons for Soundess/ Legal Complaince:
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Details of Changes to be Made:
Paragraph 6.21
Details of Reasons for Soundess/ Legal Complaince:
The section fails to properly assess the suitability of Stone Cross as a settlement to accommodate future growth whilst recognising the significant development that has occurred in this modest settlement in the last 15 years of the twentieth century. The amalgamation of Stone Cross with Polegate/Willingdon is a disingenuous attempt to improve the credentials of Stone Cross and deflect from the fact that it should not be designated a Service Centre rather a Local Service Centre or Neighbourhood Centre. However the amalgamation of these settlements will be a consequence of the strategy if pursued thus leading to an erosion of local identity and a further erosion of the pattern and character of settlements within the district (see key diagram and the amalgamation of settlement if SD5, SD7 and SD6 go ahead leading to a linear continuance settlement along the A27 as the gaps between Polegate, Stone Cross and Westham are closed) contrary to the stated aims of the Core Strategy (see for example 2.4, 2.7, 2.21 and 3.4)

Details of Changes to be Made:
Delete reference to Stone Cross and deal with Polegate and Willingdon, remove urban extensions to Stone Cross or significantly amend to reduce the scale of provision at Stone Cross commensurate and proportionate to the settlement size (estimated 3000-4000). replace part of the Stone Cross northern urban extension with a more sustainable extension to the south of Hailsham (300 - 350 homes); which would also be served by the South Hailsham Water Treatment Plant and thus would not introduce any new infrastructure issues beyond those of Stone Cross allocations.
The Core Strategy is sound and sets out a justified and effective land use strategy for the Polegate area which is consistent with national planning policy. Policy WCS4, Strategic Development Areas, lists as Location SD4 ‘Land at South Polegate and East Willingdon’. Chapter 6, paragraphs 6.21 to 6.32 and Figure 8 (pages 43-46) show a clear and suitable set of proposals. There is to be no development west of Polegate; housing is proposed to be located in an urban extension south of Polegate and east of Willingdon (Hindslands and Mornings Mill). Paragraph 6.27 of the Core Strategy states: A site was allocated in the 2005 Non Statutory Wealden Local Plan for an urban extension to the north west of Polegate in the vicinity of Honey Farm. However, this proposal was dependent upon the provision of the Folkington Link and other community infrastructure to enable the integration of development into the town. No such infrastructure has been provided or is known to be planned. Since this allocation for South Downs has achieved National Park status and the adjacent Wootton Manor has formally been included in the English Heritage Register of Historic Parks and Gardens. This site has been re-assessed as part of SHLAA and is no longer considered suitable for housing. Paragraph 6.27 of the Core Strategy is strongly supported. The overwhelming arguments against the Honey Farm Location have now been accepted by the District Council. These arguments are: 1. The Honey Farm location would be an isolated development cut off by the A27 trunk road - the ‘Folkington Link’ no longer being in the trunk road programme. 2. Foot and cycle access to the Honey Farm site would be permanently by footbridges and alleyways directly affecting residents in the Brookside Avenue area of Polegate. 3. The Honey Farm location could not be integrated into the community of Polegate and would be a separate settlement. 4. The setting of the South Downs National Park would be harmed. 5. The setting of the adjacent historic property Wootton Manor, its park and garden would be damaged. The Core Strategy is justified in rejecting the Honey Farm location. The proposed housing location at Hindslands and Mornings Mill is sound and justified.

**Representation ID**

1121

**Person ID**  Mr Hayward

**Agent ID**

107124

**Paragraph**  6.21

**Sound**  ☐ Yes  ☐ No  ☐ Justified  ☐ Effective  ☐ Consistent with national policy

**Legally Compliant**  ☐ Yes  ☐ No

**Details of Reasons for Soundness/ Legal Compliance:**

**Details of Changes to be Made:**

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**Summary of all Representations - Proposed Submission Core Strategy Regulation 27 - Report 11th July 2011**

**Representation ID**

1007

**Person ID**  White

**Agent ID**

522480

**Paragraph**  6.21

**Sound**  ☑ Yes  ☐ No  ☐ Justified  ☐ Effective  ☐ Consistent with national policy

**Legally Compliant**  ☐ Yes  ☐ No

**Details of Reasons for Soundness/ Legal Compliance:**

**Details of Changes to be Made:**

---

**Representation ID**

1121

**Person ID**  Mr Hayward

**Agent ID**

107124

**Paragraph**  6.21

**Sound**  ☐ Yes  ☐ No  ☐ Justified  ☐ Effective  ☐ Consistent with national policy

**Legally Compliant**  ☐ Yes  ☐ No

**Details of Reasons for Soundness/ Legal Compliance:**

**Details of Changes to be Made:**

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Page 885 of 1511
Details of Reasons for Soundness/ Legal Complaince:
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Details of Changes to be Made:
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Details of Changes to be Made:

The council’s comments make it clear that these allocations are undeliverable as things stand at the moment, and they seem to have no idea how and if it will be possible to overcome the identified constraints regarding the roads and water infrastructure. There these allocations are unsound and contrary to national policy and SHLAA criteria.

Details of Changes to be Made:
These allocations should be deleted and reallocated to deliverable and sustainable sites.
Summarizing all Representations - Proposed Submission Core Strategy Regulation 27 - Report 11th July 2011

**Representation ID 1595**

Person ID: 522137  
Agent ID: Polegate Town Council

Paragraph 6.21

**Sound** ☐ Yes  ☐ No  ☐ Justified  ☐ Effective  ☐ Consistent with national policy

**Legally Compliant** ☐ Yes  ☐ No

**Details of Reasons for Soundess/ Legal Complaince:**

Concern raised at the reference to Polegate and Willingdon as one settlement

**Details of Changes to be Made:**


**Representation ID 1613**

Person ID: 107745  
Agent ID: Jennifer Owen & Associates Ltd.

Paragraph 6.21

**Sound** ☐ Yes  ☐ No  ☐ Justified  ☐ Effective  ☐ Consistent with national policy

**Legally Compliant** ☐ Yes  ☐ No

**Details of Reasons for Soundess/ Legal Complaince:**

"Supplementary documents have been submitted but not attached, and may be viewed at the Council offices on request". Paragraph 6.21 third sentence. Revise to reflect limited nature of Stone Cross facilities and identify landscape constraints.

**Details of Changes to be Made:**

REVISION SOUGHT Amend third sentence "It has a small neighbourhood centre with a limited range of community facilities, limited bus service and landscape constraints."
Details of Reasons for Soundness/ Legal Complaince:
The Core Strategy is sound and sets out a justified and effective land use strategy for the Polegate area which is consistent with national planning policy. Policy WCS4, Strategic Development Areas, lists as Location SD4 'Land at South Polegate and East Willingdon'. Chapter 6, paragraphs 6.21 to 6.32 and Figure 8 (pages 43-46) show a clear and suitable set of proposals. There is to be no development west of Polegate; housing is proposed to be located in an urban extension south of Polegate and east of Willingdon (Hindslands and Mornings Mill). Paragraph 6.27 of the Core Strategy states: A site was allocated in the 2005 Non Statutory Wealden Local Plan for an urban extension to the north west of Polegate, in the vicinity of Honey Farm. However, this proposal was dependent upon the provision of the Folkington Link and other community infrastructure to enable the integration of development into the town. No such infrastructure has been provided or is known to be planned. Since this allocation the South Downs has achieved National Park status and the adjacent Wootton Manor has formally been included in the English Heritage register of Historic Parks and Gardens. This site has been re-assessed as part of SHLAA and is no longer considered suitable for housing. Figure 8 shows that the land west of Polegate north of the railway line will stay as open countryside adjacent to the National Park. Paragraph 6.27 of the Core Strategy is strongly supported. The Hone Farm or West of Polegate (Pelham Homes) site was included in the Non-Statutory Local Plan in 2004 but that Plan was never subject to a public inquiry. Those affected by the Honey Farm site were not permitted in 2004-05 to oppose it by advancing a different location for the housing, as the opportunity to propose a different location was stated then to be given by the Local Development Framework process in 2005-07. That was delayed and this stage has only now been reached with this Core Strategy. The overwhelming arguments against the Honey Farm location have now been accepted by the District Council. These arguments are: The Honey Farm location would be in isolated development cut off by the A27 trunk road - the 'Folkington Link’ no longer being in the trunk road programme; Foot and cycle access to the Honest Farm site would be permanently by footbridges and alleyways directly affecting residents in the Brookside Avenue area of Polegate; The Honey Farm location could not be integrated into the community of Polegate and would be a separate settlement; The setting of the South Downs National Park would be harmed; The setting of the adjacent historic property Wooton Manor, its park and garden would be damaged. The Core Strategy is justified in rejecting the Honey Farm location. The proposed housing location at Hindsland and Morning Mill is sound and justified. If that housing location does not prove to be the best site on further study, the preferred location for housing in the Polegate Town Council Masterplan should be chosen. This is the area north of Polegate and south of the A27 Bypass which is also considered suitable in the 2010 Strategic Housing Land Availability Assessment.

Details of Changes to be Made:
Paragraph 6.22

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The Core Strategy is sound and sets out a justified and effective land use strategy for the Polegate area which is consistent with national planning policy. Policy WCS4, Strategic Development Areas, lists as Location SD4 'Land at South Polegate and East Willingdon'. Chapter 6, paragraphs 6.21 to 6.32 and Figure 8 (pages 43-46) show a clear and suitable set of proposals. There is to be no development west of Polegate; housing is proposed to be located in an urban extension south of Polegate and east of Willingdon (Hindslands and Mornings Mill). Paragraph 6.27 of the Core Strategy states: A site was allocated in the 2005 Non Statutory Wealden Local Plan for an urban extension to the north west of Polegate, in the vicinity of Honey Farm. However, this proposal was dependent upon the provision of the Folkington Link and other community infrastructure to enable the integration of development into the town. No such infrastructure has been provided or is known to be planned. Since this allocation the South Downs has achieved National Park status and the adjacent Wootton Manor has formally been included in the English Heritage register of Historic Parks and Gardens. This site has been re-assessed as part of SHLAA and is no longer considered suitable for housing. Figure 8 shows that the land west of Polegate north of the railway line will stay as open countryside adjacent to the National Park. Paragraph 6.27 of the Core Strategy is strongly supported. The Hone Farm or West of Polegate (Pelham Homes) site was included in the Non-Statutory Local Plan in 2004 but that Plan was never subject to a public inquiry. Those affected by the Honey Farm site were not permitted in 2004-05 to oppose it by advancing a different location for the housing, as the opportunity to propose a different location was stated then to be given by the Local Development Framework process in 2005-07. That was delayed and this stage has only now been reached with this Core Strategy. The overwhelming arguments against the Honey Farm location have now been accepted by the District Council. These arguments are: The Honey Farm location would be in isolated development cut off by the A27 trunk road - the 'Folkington Link' no longer being in the trunk road programme; Foot and cycle access to the Honest Farm site would be permanently by footbridges and alleyways directly affecting residents in the Brookside Avenue area of Polegate; The Honey Farm location could not be integrated into the community of Polegate and would be a separate settlement; The setting of the South Downs National Park would be harmed; The setting of the adjacent historic property Wootton Manor, its park and garden would be damaged. The Core Strategy is justified in rejecting the Honey Farm location. The proposed housing location at Hindsland and Morning Mill is sound and justified. If that housing location does not prove to be the best site on further study, the preferred location for housing in the Polegate Town Council Masterplan should be chosen. This is the area north of Polegate and south of the A27 Bypass which is also considered suitable in the 2010 Strategic Housing Land Availability Assessment.

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Details of Changes to be Made:

Details of Reasons for Soundess/ Legal Complaince:
The location of new medical facilities outside of Polegate is not Justified or Effective. The majority of Elderly residents, and residents with young families, will find it very difficult to access those proposed facilities. There is a site, I am led to believe, within Polegate, behind the new flats built near to the railway line. The site is effectively inaccessible to those who need it most. Transport costs to the elderly will be crippling, and danger to young families cross that busy Eastbourne road will be very real.

Details of Changes to be Made:
To provide the surgery with alternative site within Polegate centre, or provide for an outreach surgery (such as they maintain at Willingdon Triangle) to cater for the vulnerable in Polegate.
Details of Reasons for Soundess/ Legal Complaince:
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Details of Changes to be Made:
<table>
<thead>
<tr>
<th>Representation ID</th>
<th>Core Strategy Regulation 27 - Report 11th July 2011</th>
</tr>
</thead>
<tbody>
<tr>
<td>Person ID</td>
<td>Miss Hunter</td>
</tr>
<tr>
<td>Agent ID</td>
<td>330812</td>
</tr>
<tr>
<td>Paragraph</td>
<td>6.22</td>
</tr>
<tr>
<td>Sound</td>
<td>☑ Yes ☐ No ☐ Justified ☐ Effective ☐ Consistent with national policy</td>
</tr>
<tr>
<td>Legally Compliant</td>
<td>☑ Yes ☐ No</td>
</tr>
</tbody>
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**Details of Reasons for Soundess/ Legal Complaince:**

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**Details of Changes to be Made:**

Yes ☑ Sound ☐ Legally Compliant ☑ Yes ☐ No
Paragraph 6.22

Details of Reasons for Soundess/ Legal Complaince:
The Core Strategy is sound and sets out a justified and effective land use strategy for the Polegate area which is consistent with national planning policy. Policy WCS4, Strategic Development Areas, lists as Location SD4 'Land at South Polegate and East Willingdon'. Chapter 6, paragraphs 6.21 to 6.32 and Figure 8 (pages 43-46) show a clear and suitable set of proposals. There is to be no development west of Polegate; housing is proposed to be located in an urban extension south of Polegate and east of Willingdon (Hindslands and Mornings Mill). Paragraph 6.27 of the Core Strategy states: A site was allocated in the 2005 Non Statutory Wealden Local Plan for an urban extension to the north west of Polegate in the vicinity of Honey Farm. However, this proposal was dependent upon the provision of the Folkington Link and other community infrastructure to enable the integration of development into the town. No such infrastructure has been provided or is known to be planned. Since this allocation for South Downs has achieved National Park status and the adjacent Wootton Manor has formally been included in the English Heritage Register of Historic Parks and Gardens. This site has been re-assessed as part of SHLAA and is no longer considered suitable for housing. Paragraph 6.27 of the Core Strategy is strongly supported. The overwhelming arguments against the Honey Farm Location have now been accepted by the District Council. These arguments are: 1. The Honey Farm location would be an isolated development cut off by the A27 trunk road - the 'Folkington Link' no longer being in the trunk road programme. 2. Foot and cycle access to the Honey Farm site would be permanently by footbridges and alleyways directly affecting residents in the Brookside Avenue area of Polegate. 3. The Honey Farm location could not be integrated into the community of Polegate and would be a separate settlement. 4. The setting of the South Downs National Park would be harmed. 5. The setting of the adjacent historic property Wootton Manor, its park and garden would be damaged. The Core Strategy is justified in rejecting the Honey Farm location. The proposed housing location at Hindslands and Mornings Mill is sound and justified.

Details of Changes to be Made:

Paragraph 6.22

Details of Reasons for Soundess/ Legal Complaince:
6.22 refers to the 'limited range of facilities available locally', and states 'a new GP surgery and medical center has recently been granted planning consent in Willingdon.' This scheme is not progressing, and will leave the limited range of facilities increasingly stretched with the proposal for 700 additional dwellings.

Details of Changes to be Made:
Paragraph 6.22

Details of Reasons for Soundess/ Legal Complaince:

Paragraphs 6.21 - 6.30 of the document provide further infromation to support the Council's policy approach towards further development at Stone Cross and this is supported. Text at paragraph 6.31 identifies the potential split in housing delivery between the two strategic development areas of Stone Cross (SD6 and SD7) although it is noted that there is flexibility here subject to the local highway improvements required to accomodate the development. This flexibility within the overall strategy to deal with changing circumstances is welcomed and is considered to ensure the Core Strategy is effective in line with the requirems of paragraphs 4.44 and 4.46 of PPS12. Sites north of Rattle Road , east of Stone Cross within SD6 have been determined within the SHLAA to be deliverable housing sites. It is acknowledged that the development of these sites would have a limited impact on the landscape and that structural planning can mitigate any local impact as well as protect against potentially conflicting land uses. Between the two sites in the SHLAA east of Stone Cross, north of Rattle Road, the landowners are collaborating with regard to access and evidence of this will be forwarded to the District council in due course. Likewise, a Phase 1 Habitats Survey has been commissioned to support the general masterplan development of this location and again this will be forwarded to the Council following its completion to provide further evidence of the suitability of this location for development. As the Council will be aware , my client's land (The Oaks, Rattle Road - SLHAA ref: 415/3280) fronts directly onto Rattle Raod, is in the control of one single landowner, can be brought forward for development at any time and to the best of our knowledge is free from any environmental constraint. In this respect, we consider its inclusion within the identified SD6 Strategic Development Area is sensible and reflects a sound approach that will contribute to ensuring the Core Strategy is deliverable, founded on a robust and credible evidence base and is the most appropriate strategy when considered agains the reasonable alternatives. The Council has engaged with the community in its consultations on the Issues and Options Paper 2007 and the Spatial Development Options Consulation in 2009. The comments from these consultations, particularly with regard to the need for affordable housing, have been reflected in the emerging policies. We are also aware that the Council continues to engage with Parish Councils in the area, including Jevington and Westham Parish Councils, to help reflect their vision for the settlements and service provision. As a result I agree that the Core Strategy is generally sound (subject to my comments concerning Policy WCS1), and demonstrates effectiveness in the delivery of development in this part of the District. I therefore consider Strategic Development Area SD6 in the Proposed Submission Core Strategy to be 'sound' in terms of the tests in Planning Policy Statement 12. I consider it justified, based on credible and robust evidence and effective with regard to delivery and flexibility and is consistent with national policy.

Details of Changes to be Made:
The Core Strategy is sound and sets out a justified and effective land use strategy for the Polegate area which is consistent with national planning policy. Policy WCS4, Strategic Development Areas, lists as Location SD4 'Land at South Polegate and East Willingdon'. Chapter 6, paragraphs 6.21 to 6.32 and Figure 8 (pages 43-46) show a clear and suitable set of proposals. There is to be no development west of Polegate; housing is proposed to be located in an urban extension south of Polegate and east of Willingdon (Hindslands and Mornings Mill). Paragraph 6.27 of the Core Strategy states: A site was allocated in the 2005 Non Statutory Wealden Local Plan for an urban extension to the north west of Polegate, in the vicinity of Honey Farm. However, this proposal was dependent upon the provision of the Folkington Link and other community infrastructure to enable the integration of development into the town. No such infrastructure has been provided or is known to be planned. Since this allocation the South Downs has achieved National Park status and the adjacent Wootton Manor has formally been included in the English Heritage register of Historic Parks and Gardens. This site has been re-assessed as part of SHLAA and is no longer considered suitable for housing. Paragraph 6.27 of the Core Strategy is strongly supported. The overwhelming arguments against the Honey Farm location have now been accepted by the District Council. These arguments are: The Honey Farm location would be in isolated development cut off by the A27 trunk road - the 'Folkington Link' no longer being in the trunk road programme; Foot and cycle access to the Honest Farm site would be permanently by footbridges and alleyways directly affecting residents in the Brookside Avenue area of Polegate; The Honey Farm location could not be integrated into the community of Polegate and would be a separate settlement; The setting of the South Downs National Park would be harmed; The setting of the adjacent historic property Wootton Manor, its park and garden would be damaged. The Core Strategy is justified in rejecting the Honey Farm location. The proposed housing location at Hindsland and Morning Mill is sound and justified.

Details of Changes to be Made:

Yes  Sound  Justified  Effective  Consistent with national policy

Yes  Legally Compliant  No
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Details of Reasons for Soundess/ Legal Complaince:

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Details of Changes to be Made:

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Paragraph 6.22

Details of Reasons for Soundness/ Legal Compliance:
The council’s comments make it clear that these allocations are undeliverable as things stand at the moment, and they seem to have no idea how and if it will be possible to overcome the identified constraints regarding the roads and waste water infrastructure. There these allocations are unsound and contrary to national policy and SHLAA criteria.

Details of Changes to be Made:
These allocations should be deleted and reallocated to deliverable and sustainable sites.
Details of Reasons for Soundess/ Legal Complaince:
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Yes Sound

Justified Effective

Consistent with national policy

Legally Compliant Yes No
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Paragraph 6.22

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Details of Changes to be Made:

Yes  Sound  No  Justified  Effective  Consistent with national policy

Legally Compliant  Yes  No
Paragraph 6.22
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Details of Changes to be Made:

Sound    ☑ Yes     ☐ No     ☐ Justified      ☐ Effective     ☐ Consistent with national policy
Legally Complainant    ☐ Yes     ☐ No

Yes
Sound
No
Effective
Consistent with national policy

Yes
Legally Complainant
No
Paragraph 6.22

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Details of Changes to be Made:
Paragraph 6.22

Details of Reasons for Soundess/ Legal Complaince:
The section fails to properly assess the suitability of Stone Cross as a settlement to accommodate future growth whilst recognising the significant development that has occurred in this modest settlement in the last 15 years of the twentieth century. The amalgamation of Stone Cross with Polegate/Willingdon is a disingenuous attempt to improve the credentials of Stone Cross and deflect from the fact that it should not be designated a Service Centre rather a Local Service Centre or Neighbourhood Centre. However the amalgamation of these settlements will be a consequence of the strategy if pursued thus leading to an erosion of local identity and a further erosion of the pattern and character of settlements within the district (see key diagram and the amalgamation of settlement if SD5, SD7 and SD6 go ahead leading to a linear continuance settlement along the A27 as the gaps between Polegate, Stone Cross and Westham are closed) contrary to the stated aims of the Core Strategy (see for example 2.4, 2.7, 2.21 and 3.4)

Details of Changes to be Made:
Delete reference to Stone Cross and deal with Polegate and Willingdon, remove urban extensions to Stone Cross or significantly amend to reduce the scale of provision at Stone Cross commensurate and proportionate to the settlement size (estimated 3000-4000). replace part of the Stone Cross northern urban extension with a more sustainable extension to the south of Hailsham (300 - 350 homes); which would also be served by the South Hailsham Water Treatment Plant and thus would not introduce any new infrastructure issues beyond those of Stone Cross allocations.

Representation ID
1614

Person ID Pelham Homes
107745

Agent ID Mrs Owen
102625

Paragraph 6.22

Sound ☐ Yes ☑ No ☑ Justified ☐ Effective ☐ Consistent with national policy
Legally Compliant ☑ Yes ☐ No

Details of Reasons for Soundess/ Legal Complaince:
"Supplementary documents have been submitted but not attached, and may be viewed at the Council offices on request". Paragraph 6.22. The proportion of elderly residents is set to change as new housing is built. This paragraph also underestimates the facilities available at Polegate especially compared with Stone Cross.

Details of Changes to be Made:
REVISION SOUGHT Amend first sentence "....elderly residents reflecting the high proportion of bungalows but this is set to change as new committed housing is built. Future housing is also expected to attract a younger population
Details of Reasons for Soundess/ Legal Complaince:

6.22 refers to the 'limited range of facilities available locally' and states 'a new GP surgery and medical centre has recently been granted planning consent in Willingdon'. As this scheme’s progression is in question PCT question whether the medical infrastructure proposed is sound, being in mind the uncertainty of the location of current and future surgeries.

Details of Changes to be Made:

Sound ☑ Yes ☐ No ☐ Justified ☐ Effective ☐ Consistent with national policy
Legally Compliant ☐ Yes ☐ No

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Legally Compliant
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No
No
Consistent with national policy
No
Effective
Justified
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Details of Changes to be Made:

Yes  Sound
No   Justified
Yes  Effective
Yes  Consistent with national policy

Legally Compliant

Yes  No
Paragraph 6.23

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Details of Reasons for Soundness/ Legal Compliance:

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Details of Changes to be Made:
Paragraph 6.23

Details of Reasons for Soundess/ Legal Complaince:

Paragraphs 6.21 - 6.30 of the document provide further information to support the Council's policy approach towards further development at Stone Cross and this is supported. Text at paragraph 6.31 identifies the potential split in housing delivery between the two strategic development areas of Stone Cross (SD6 and SD7) although it is noted that there is flexibility here subject to the local highway improvements required to accommodate the development. This flexibility within the overall strategy to deal with changing circumstances is welcomed and is considered to ensure the Core Strategy is effective in line with the requirements of paragraphs 4.44 and 4.46 of PPS12. Sites north of Rattle Road, east of Stone Cross within SD6 have been determined within the SHLAA to be deliverable housing sites. It is acknowledged that the development of these sites would have a limited impact on the landscape and that structural planning can mitigate any local impact as well as protect against potentially conflicting land uses. Between the two sites in the SHLAA east of Stone Cross, north of Rattle Road, the landowners are collaborating with regard to access and evidence of this will be forwarded to the District council in due course. Likewise, a Phase 1 Habitats Survey has been commissioned to support the general masterplan development of this location and again this will be forward to the Council following its completion to provide further evidence of the suitability of this location for development. As the Council will be aware, my client's land (The Oaks, Rattle Road - SLHAA ref: 415/3280) fronts directly onto Rattle Road, is in the control of one single landowner, can be brought forward for development at any time and to the best of our knowledge is free from any environmental constraint. In this respect, we consider its inclusion within the identified SD6 Strategic Development Area is sensible and reflects a sound approach that will contribute to ensuring the Core Strategy is deliverable, founded on a robust and credible evidence base and is the most appropriate strategy when considered against the reasonable alternatives. The Council has engaged with the community in its consultations on the Issues and Options Paper 2007 and the Spatial Development Options Consultation in 2009. The comments from these consultations, particularly with regard to the need for affordable housing, have been reflected in the emerging policies. We are also aware that the Council continues to engage with Parish Councils in the area, including Jevington and Westham Parish Councils, to help reflect their vision for the settlements and service provision. As a result I agree that the Core Strategy is generally sound (subject to my comments concerning Policy WCS1), and demonstrates effectiveness in the delivery of development in this part of the District. I therefore consider Strategic Development Area SD6 in the Proposed Submission Core Strategy to be 'sound' in terms of the tests in Planning Policy Statement 12. I consider it justified, based on credible and robust evidence and effective with regard to delivery and flexibility and is consistent with national policy.

Details of Changes to be Made:

Representation ID
693

Person ID  | Beams  | Agent ID
-----------|--------|-----------
519685     | Willingdon and Jevington Parish Council |

Paragraph 6.23

Details of Reasons for Soundess/ Legal Complaince:

6.23 states 'the A2270 running through the urban area is still heavily congested and traffic flows on the strategic road network are very high.' Numerous references are made throughout the strategy to the need for infrastructure, and 5.16 states 'development at SD4 will be phased to commence from 2019 to enable implementation of development in relation to transport infrastructure requirements and interventions in South Wealden.' WJPC has serious concerns over the impact of additional vehicles on the heavily congested road network, and seek assurances regarding the planned vehicular access routes for any new developments.

Details of Changes to be Made:
Paragraph 6.23

Details of Reasons for Soundness/ Legal Compliance:
The section fails to properly assess the suitability of Stone Cross as a settlement to accommodate future growth whilst recognising the significant development that has occurred in this modest settlement in the last 15 years of the twentieth century. The amalgamation of Stone Cross with Polegate/Willingdon is a disingenuous attempt to improve the credentials of Stone Cross and deflect from the fact that it should not be designated a Service Centre rather a Local Service Centre or Neighbourhood Centre. However the amalgamation of these settlements will be a consequence of the strategy if pursued thus leading to an erosion of local identity and a further erosion of the pattern and character of settlements within the district (see key diagram and the amalgamation of settlement if SD5, SD7 and SD6 go ahead leading to a linear continuance settlement along the A27 as the gaps between Polegate, Stone Cross and Westham are closed) contrary to the stated aims of the Core Strategy (see for example 2.4, 2.7, 2.21 and 3.4)

Details of Changes to be Made:
Delete reference to Stone Cross and deal with Polegate and Willingdon, remove urban extensions to Stone Cross or significantly amend to reduce the scale of provision at Stone Cross commensurate and proportionate to the settlement size (estimated 3000-4000). replace part of the Stone Cross northern urban extension with a more sustainable extension to the south of Hailsham (300 - 350 homes); which would also be served by the South Hailsham Water Treatment Plant and thus would not introduce any new infrastructure issues beyond those of Stone Cross allocations.

Legend

Yes □
No ☑
Justified ☑
Effective ☑
Consistent with national policy ☑
Legally Compliant ☑

Yes
No

Reference is made to the potential for highway improvements to be made. The extent of these improvements ia as yet unknown. Greater clarity is required at this stage of the Core Strategy if certainty is to be given to the developers of the housing allocations to ensure delivery in accordance with the phasing plan. All contributions required to be made to highway improvements must be relevant to the proposed scale of developments.

Details of Changes to be Made:
Greater clarity on the extent and necessity of highway improvements relating to development in the Stone Cross area is required at this stage of the Core Strategy process. WEC must provide evidence base in support of the required improvements to justify the obligation.
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Details of Changes to be Made:
Paragraph 6.23

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Details of Changes to be Made:
Representation ID
973
Person ID Stevens
522477
Agent ID
Paragraph 6.23

Sound ☑ Yes ☐ No ☐ Justified ☐ Effective ☐ Consistent with national policy
Legally Compliant ☐ Yes ☐ No

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Details of Changes to be Made:
Paragraph 6.23

Details of Reasons for Soundness/ Legal Complaince:
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Details of Changes to be Made:

These allocations should be deleted and reallocated to deliverable and sustainable sites.
Details of Reasons for Soundness/ Legal Complaince:

Paragraph 6.23 states 'the A2270 running through the urban area is still heavily congested and traffic flows on the strategic road network are very high'. Numerous references are made throughout the strategy to the need for infrastructure, and 5.16 states 'development at SD4 will be phased to commence from 2019 to enable integration of development in relation to transport infrastructure requirements and interventions in South Wealden'.

Details of Changes to be Made:

PTC has serious concerns over the impact of any additional vehicles on the heavily congested road network, and feel that the proposed transport strategy is unsound because of the numbers of extra vehicles any development would bring onto the A2270.

Details of Reasons for Soundness/ Legal Complaince:

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Details of Changes to be Made:
Paragraph 6.24

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Details of Changes to be Made:

Yes

Sound ☑ Yes ☐ No ☐ Justified ☐ Effective ☐ Consistent with national policy

Legally Compliant ☐ Yes ☐ No
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Details of Changes to be Made:
Paragraph 6.21 - 6.30 of the document provide further information to support the Council's policy approach towards further development at Stone Cross and this is supported. Text at paragraph 6.31 identifies the potential split in housing delivery between the two strategic development areas of Stone Cross (SD6 and SD7) although it is noted that there is flexibility here subject to the local highway improvements required to accommodate the development. This flexibility within the overall strategy to deal with changing circumstances is welcomed and is considered to ensure the Core Strategy is effective in line with the requirements of paragraphs 4.44 and 4.46 of PPS12. Sites north of Rattle Road, east of Stone Cross within SD6 have been determined within the SHLAA to be deliverable housing sites. It is acknowledged that the development of these sites would have a limited impact on the landscape and that structural planning can mitigate any local impact as well as protect against potentially conflicting land uses. Between the two sites in the SHLAA east of Stone Cross, north of Rattle Road, the landowners are collaborating with regard to access and evidence of this will be forwarded to the District council in due course. Likewise, a Phase 1 Habitats Survey has been commissioned to support the general masterplan development of this location and again this will be forwarded to the Council following its completion to provide further evidence of the suitability of this location for development. As the Council will be aware, my client's land (The Oaks, Rattle Road - SLHAA ref: 415/3280) fronts directly onto Rattle Road, is in the control of one single landowner, can be brought forward for development at any time and to the best of our knowledge is free from any environmental constraint. In this respect, we consider its inclusion within the identified SD6 Strategic Development Area is sensible and reflects a sound approach that will contribute to ensuring the Core Strategy is deliverable, founded on a robust and credible evidence base and is the most appropriate strategy when considered against the reasonable alternatives. The Council has engaged with the community in its consultations on the Issues and Options Paper 2007 and the Spatial Development Options Consultation in 2009. The comments from these consultations, particularly with regard to the need for affordable housing, have been reflected in the emerging policies. We are also aware that the Council continues to engage with Parish Councils in the area, including Jevington and Westham Parish Councils, to help reflect their vision for the settlements and service provision. As a result I agree that the Core Strategy is generally sound (subject to my comments concerning Policy WCS1), and demonstrates effectiveness in the delivery of development in this part of the District. I therefore consider Strategic Development Area SD6 in the Proposed Submission Core Strategy to be 'sound' in terms of the tests in Planning Policy Statement 12. I consider it justified, based on credible and robust evidence and effective with regard to delivery and flexibility and is consistent with national policy.

Details of Changes to be Made:
Details of Reasons for Soundess/ Legal Complaince:

The Core Strategy is sound and sets out a justified and effective land use strategy for the Polegate area which is consistent with national planning policy. Policy WCS4, Strategic Development Areas, lists as Location SD4 'Land at South Polegate and East Willingdon'. Chapter 6, paragraphs 6.21 to 6.32 and Figure 8 (pages 43-46) show a clear and suitable set of proposals. There is to be no development west of Polegate; housing is proposed to be located in an urban extension south of Polegate and east of Willingdon (Hindslands and Mornings Mill). Paragraph 6.27 of the Core Strategy states: A site was allocated in the 2005 Non Statutory Wealden Local Plan for an urban extension to the north west of Polegate, in the vicinity of Honey Farm. However, this proposal was dependent upon the provision of the Folkington Link and other community infrastructure to enable the integration of development into the town. No such infrastructure has been provided or is known to be planned. Since this allocation the South Downs has achieved National Park status and the adjacent Wootton Manor has formally been included in the English Heritage register of Historic Parks and Gardens. This site has been re-assessed as part of SHLAA and is no longer considered suitable for housing. Paragraph 6.27 of the Core Strategy is strongly supported. The overwhelming arguments against the Honey Farm location have now been accepted by the District Council. These arguments are: The Honey Farm location would be in isolated development cut off by the A27 trunk road - the 'Folkington Link' no longer being in the trunk road programme; Foot and cycle access to the Honest Farm site would be permanently by footbridges and alleyways directly affecting residents in the Brookside Avenue area of Polegate; The Honey Farm location could not be integrated into the community of Polegate and would be a separate settlement; The setting of the South Downs National Park would be harmed; The setting of the adjacent historic property Wooton Manor, its park and garden would be damaged. The Core Strategy is justified in rejecting the Honey Farm location. The proposed housing location at Hindsland and Morning Mill is sound and justified.

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Details of Changes to be Made:

Yes
Sound
No
Justified
Effective
Consistent with national policy

Legally Compliant
Yes
No
Details of Reasons for Soundess/ Legal Complaince:

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Details of Changes to be Made:

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Details of Changes to be Made:

Details of Reasons for Soundess/ Legal Complaince:
The council's comments make it clear that these allocations are undeliverable as things stand at the moment, and they seem to have no idea how and if it will be possible to overcome the identified constraints regarding the roads and wast water infrastructure. There these allocations are unsound and contrary to national policy and SHLAA criteria.

Details of Changes to be Made:
These allocations should be deleted and reallocated to deliverable and sustainable sites.
Representation ID
841
Person ID  Mr Harmer
533640
Agent ID
Paragraph  6.24
Sound  Yes  No  Justified  Effective  Consistent with national policy
Legally Compliant  Yes  No

Details of Reasons for Soundness/ Legal Complaince:
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Details of Changes to be Made:
Representation ID
877
Person ID          Voorspuy      Agent ID
121909  6.24

Paragraph 6.24

Details of Reasons for Soundness/ Legal Compliance:
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Details of Changes to be Made:

Yes
Sound

No
Legally Compliant

Yes

No

Justified

Effective

Consistent with national policy
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Details of Changes to be Made:
### Representation ID
950

### Person ID
522470

### Agent ID
Miss Evans

### Paragraph
6.24

### Sound
- [x] Yes
- [ ] No
- [ ] Justified
- [ ] Effective
- [ ] Consistent with national policy

### Legally Compliant
- [ ] Yes
- [ ] No

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- [ ] Yes
- [ ] No
- [ ] Sound
- [ ] Justified
- [ ] Effective
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Details of Changes to be Made:
Summary of all Representations - Proposed Submission Core Strategy Regulation 27 - Report 11th July 2011

Representation ID
1009

Person ID White
Agent ID

Paragraph 6.24

Details of Reasons for Soundness/ Legal Complaince:
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Details of Changes to be Made:

Yes Sound
No Justified
Effective Consistent with national policy
Legally Compliant Yes No

Paragraph 6.24

Page 991 of 1511
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Details of Changes to be Made:

Yes  Sound  Justified  Effective  Consistent with national policy

Legally Compliant  Yes  No
Details of Reasons for Soundess/ Legal Complaince:
The Core Strategy is sound and sets out a justified and effective land use strategy for the Polegate area which is consistent with national planning policy. Policy WCS4, Strategic Development Areas, lists as Location SD4 'Land at South Polegate and East Willingdon'. Chapter 6, paragraphs 6.21 to 6.32 and Figure 8 (pages 43-46) show a clear and suitable set of proposals. There is to be no development west of Polegate; housing is proposed to be located in an urban extension south of Polegate and east of Willingdon (Hindslands and Mornings Mill). Paragraph 6.27 of the Core Strategy states: A site was allocated in the 2005 Non Statutory Wealden Local Plan for an urban extension to the north west of Polegate in the vicinity of Honey Farm. However, this proposal was dependent upon the provision of the Folkington Link and other community infrastructure to enable the integration of development into the town. No such infrastructure has been provided or is known to be planned. Since this allocation for South Downs has achieved National Park status and the adjacent Wootton Manor has formally been included in the English Heritage Register of Historic Parks and Gardens. This site has been re-assessed as part of SHLAA and is no longer considered suitable for housing. Paragraph 6.27 of the Core Strategy is strongly supported. The overwhelming arguments against the Honey Farm Location have now been accepted by the District Council. These arguments are: 1. The Honey Farm location would be an isolated development cut off by the A27 trunk road - the 'Folkington Link' no longer being in the trunk road programme. 2. Foot and cycle access to the Honey Farm site would be permanently by footbridges and alleyways directly affecting residents in the Brookside Avenue area of Polegate. 3. The Honey Farm location could not be integrated into the community of Polegate and would be a separate settlement. 4. The setting of the South Downs National Park would be harmed. 5. The setting of the adjacent historic property Wootton Manor, its park and garden would be damaged. The Core Strategy is justified in rejecting the Honey Farm location. The proposed housing location at Hindslands and Mornings Mill is sound and justified.

Details of Changes to be Made:
Summary of all Representations - Proposed Submission Core Strategy Regulation 27 - Report 11th July 2011

Representation ID
1033

Person ID  Mrs Hancock
522483

Agent ID
6.24

Sound  Yes  No  Justified  Effective  Consistent with national policy
Legally Compliant  Yes  No

Details of Reasons for Soundess/ Legal Complaince:
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Details of Changes to be Made:
### Details of Reasons for Soundness/ Legal Complaince:

The section fails to properly assess the suitability of Stone Cross as a settlement to accommodate future growth whilst recognising the significant development that has occurred in this modest settlement in the last 15 years of the twentieth century. The amalgamation of Stone Cross with Polegate/Willingdon is a disingenuous attempt to improve the credentials of Stone Cross and deflect from the fact that it should not be designated a Service Centre rather a Local Service Centre or Neighbourhood Centre. However the amalgamation of these settlements will be a consequence of the strategy if pursued thus leading to an erosion of local identity and a further erosion of the pattern and character of settlements within the district (see key diagram and the amalgamation of settlement if SD5, SD7 and SD6 go ahead leading to a linear continuance settlement along the A27 as the gaps between Polegate, Stone Cross and Westham are closed) contrary to the stated aims of the Core Strategy (see for example 2.4, 2.7, 2.21 and 3.4)

### Details of Changes to be Made:

Delete reference to Stone Cross and deal with Polegate and Willingdon, remove urban extensions to Stone Cross or significantly amend to reduce the scale of provision at Stone Cross commensurate and proportionate to the settlement size (estimated 3000-4000). replace part of the Stone Cross northern urban extension with a more sustainable extension to the south of Hailsham (300 - 350 homes); which would also be served by the South Hailsham Water Treatment Plant and thus would not introduce any new infrastructure issues beyond those of Stone Cross allocations.

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### Details of Changes to be Made:

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Page 998 of 1511
Paragraph 6.25

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Details of Changes to be Made:
Paragraph 6.25

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Paragraph 6.25

Details of Reasons for Soundness/ Legal Complaince:

Paragraphs 6.21 - 6.30 of the document provide further information to support the Council's policy approach towards further development at Stone Cross and this is supported. Text at paragraph 6.31 identifies the potential split in housing delivery between the two strategic development areas of Stone Cross (SD6 and SD7) although it is noted that there is flexibility here subject to the local highway improvements required to accommodate the development. This flexibility within the overall strategy to deal with changing circumstances is welcomed and is considered to ensure the Core Strategy is effective in line with the requirements of paragraphs 4.44 and 4.46 of PPS12. Sites north of Rattle Road, east of Stone Cross within SD6 have been determined within the SHLAA to be deliverable housing sites. It is acknowledged that the development of these sites would have a limited impact on the landscape and that structural planning can mitigate any local impact as well as protect against potentially conflicting land uses. Between the two sites in the SHLAA east of Stone Cross, north of Rattle Road, the landowners are collaborating with regard to access and evidence of this will be forwarded to the District council in due course. Likewise, a Phase 1 Habitats Survey has been commissioned to support the general masterplan development of this location and again this will be forwarded to the Council following its completion to provide further evidence of the suitability of this location for development. As the Council will be aware, my client's land (The Oaks, Rattle Road - SLHAA ref: 415/3280) fronts directly onto Rattle Road, is in the control of one single landowner, can be brought forward for development at any time and to the best of our knowledge is free from any environmental constraint. In this respect, we consider its inclusion within the identified SD6 Strategic Development Area is sensible and reflects a sound approach that will contribute to ensuring the Core Strategy is deliverable, founded on a robust and credible evidence base and is the most appropriate strategy when considered against the reasonable alternatives. The Council has engaged with the community in its consultations on the Issues and Options Paper 2007 and the Spatial Development Options Consultation in 2009. The comments from these consultations, particularly with regard to the need for affordable housing, have been reflected in the emerging policies. We are also aware that the Council continues to engage with Parish Councils in the area, including Jevington and Westham Parish Councils, to help reflect their vision for the settlements and service provision. As a result I agree that the Core Strategy is generally sound (subject to my comments concerning Policy WCS1), and demonstrates effectiveness in the delivery of development in this part of the District. I therefore consider Strategic Development Area SD6 in the Proposed Submission Core Strategy to be 'sound' in terms of the tests in Planning Policy Statement 12. I consider it justified, based on credible and robust evidence and effective with regard to delivery and flexibility and is consistent with national policy.

Details of Changes to be Made:

Representation ID
694

Person ID  Mr  Beams
519685  Willingdon and Jevington Parish Council

Agent ID

Paragraph 6.25

Sound  Yes  No  Justified  Effective  Consistent with national policy

Legally Compliant  Yes  No

Details of Reasons for Soundess/ Legal Complaince:

6.25 states 'our studies show the the town (Polegate) also lacks key infrastructure and facilities including sports and play facilities'. Hindsland Playing Fields is an established sports facility within Willingdon, which could be utilised for the benefit of both Parishes, yet it is identified in SD4 for housing development.

Details of Changes to be Made:
Paragraph 6.25
Details of Reasons for Soundness/ Legal Compliance:
The section fails to properly assess the suitability of Stone Cross as a settlement to accommodate future growth whilst recognising the significant development that has occurred in this modest settlement in the last 15 years of the twentieth century. The amalgamation of Stone Cross with Polegate/Willingdon is a disingenuous attempt to improve the credentials of Stone Cross and deflect from the fact that it should not be designated a Service Centre rather a Local Service Centre or Neighbourhood Centre. However the amalgamation of these settlements will be a consequence of the strategy if pursued thus leading to an erosion of local identity and a further erosion of the pattern and character of settlements within the district (see key diagram and the amalgamation of settlement if SD5, SD7 and SD6 go ahead leading to a linear continuance settlement along the A27 as the gaps between Polegate, Stone Cross and Westham are closed) contrary to the stated aims of the Core Strategy (see for example 2.4, 2.7, 2.21 and 3.4)

Details of Changes to be Made:
Delete reference to Stone Cross and deal with Polegate and Willingdon, remove urban extensions to Stone Cross or significantly amend to reduce the scale of provision at Stone Cross commensurate and proportionate to the settlement size (estimated 3000-4000). replace part of the Stone Cross northern urban extension with a more sustainable extension to the south of Hailsham (300 - 350 homes); which would also be served by the South Hailsham Water Treatment Plant and thus would not introduce any new infrastructure issues beyond those of Stone Cross allocations.
Details of Reasons for Soundess/ Legal Complaince:
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Details of Changes to be Made:

Yes  No  Justified  Effective  Consistent with national policy
Sound

Yes  No  Legally Compliant

No
Details of Reasons for Soundness/ Legal Compliance:

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Details of Changes to be Made:

Yes  Sound  Yes  No  Justified  Yes  Effective  No  Consistent with national policy  Legally Compliant  Yes  No

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Paragraph 6.25 Details of Reasons for Soundess/ Legal Complaince:

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Yes  Sound  No  Justified  Effective  Consistent with national policy

Yes  Legally Compliant  No
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Paragraph 6.25

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Details of Changes to be Made:

Sound  Yes  No  Justified  Effective  Consistent with national policy
Legally Compliant  Yes  No
Details of Reasons for Soundness/ Legal Compliance:
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Details of Changes to be Made:

Representation ID
802

Person ID Mr & Flittner
Agent ID
106034

Paragraph 6.25

Sound Yes No Justified Effective Consistent with national policy
Legally Compliant Yes No

Details of Reasons for Soundness/ Legal Compliance:
The council's comments make it clear that these allocations are undeliverable as things stand at the moment, and they seem to have no idea how and if it will be possible to overcome the identified constraints regarding the roads and waste water infrastructure. There these allocations are unsound and contrary to national policy and SHLAA criteria.

Details of Changes to be Made:
These allocations should be deleted and reallocated to deliverable and sustainable sites.
Details of Reasons for Soundess/ Legal Complaince:
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Details of Changes to be Made:
Paragraph 6.26

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Details of Changes to be Made:
Details of Reasons for Soundess/ Legal Complaince:

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Details of Changes to be Made:
Representation ID
239

Person ID Mrs Tomlinson
Agent ID 521465

Paragraph 6.26

Sound ☑ Yes ☐ No ☐ Justified ☐ Effective ☐ Consistent with national policy

Legally Compliant ☐ Yes ☐ No

Details of Reasons for Soundess/ Legal Complaince:
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Details of Changes to be Made:

6.26 We support the continued use of the A27/A22 line as the western boundary for development in Polegate
Details of Reasons for Soundness/ Legal Compliance:

Paragraphs 6.21 - 6.30 of the document provide further information to support the Council's policy approach towards further development at Stone Cross and this is supported. Text at paragraph 6.31 identifies the potential split in housing delivery between the two strategic development areas of Stone Cross (SD6 and SD7) although it is noted that there is flexibility here subject to the local highway improvements required to accommodate the development. This flexibility within the overall strategy to deal with changing circumstances is welcomed and is considered to ensure the Core Strategy is effective in line with the requirements of paragraphs 4.44 and 4.46 of PPS12. Sites north of Rattle Road, east of Stone Cross within SD6 have been determined within the SHLAA to be deliverable housing sites. It is acknowledged that the development of these sites would have a limited impact on the landscape and that structural planning can mitigate any local impact as well as protect against potentially conflicting land uses. Between the two sites in the SHLAA east of Stone Cross, north of Rattle Road, the landowners are collaborating with regard to access and evidence of this will be forwarded to the District council in due course. Likewise, a Phase 1 Habitats Survey has been commissioned to support the general masterplan development of this location and again this will be forwarded to the Council following its completion to provide further evidence of the suitability of this location for development. As the Council will be aware, my client's land (The Oaks, Rattle Road - SLHAA ref: 415/3280) fronts directly onto Rattle Road, is in the control of one single landowner, can be brought forward for development at any time and to the best of our knowledge is free from any environmental constraint. In this respect, we consider its inclusion within the identified SD6 Strategic Development Area is sensible and reflects a sound approach that will contribute to ensuring the Core Strategy is deliverable, founded on a robust and credible evidence base and is the most appropriate strategy when considered against the reasonable alternatives. The Council has engaged with the community in its consultations on the Issues and Options Paper 2007 and the Spatial Development Options Consultation in 2009. The comments from these consultations, particularly with regard to the need for affordable housing, have been reflected in the emerging policies. We are also aware that the Council continues to engage with Parish Councils in the area, including Jevington and Westham Parish Councils, to help reflect their vision for the settlements and service provision. As a result I agree that the Core Strategy is generally sound (subject to my comments concerning Policy WCS1), and demonstrates effectiveness in the delivery of development in this part of the District. I therefore consider Strategic Development Area SD6 in the Proposed Submission Core Strategy to be 'sound' in terms of the tests in Planning Policy Statement 12. I consider it justified, based on credible and robust evidence and effective with regard to delivery and flexibility and is consistent with national policy.

Details of Changes to be Made:
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## Details of Changes to be Made:

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<th>Justified</th>
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</thead>
<tbody>
<tr>
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<td>Yes</td>
<td>No</td>
<td>Yes</td>
<td>No</td>
</tr>
</tbody>
</table>

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Details of Changes to be Made:

Details of Reasons for Soundness/ Legal Compliance:
The council's comments make it clear that these allocations are undeliverable as things stand at the moment, and they seem to have no idea how and if it will be possible to overcome the identified constraints regarding the roads and waste water infrastructure. There these allocations are unsound and contrary to national policy and SHLAA criteria.

Details of Changes to be Made:
These allocations should be deleted and reallocated to deliverable and sustainable sites.
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Details of Changes to be Made:
Paragraph 6.26

Details of Reasons for Soundess/ Legal Complaince:
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Details of Changes to be Made:

Yes Sound
Yes Legally Compliant

No Justified
Yes Effective
No Consistent with national policy

Page 1046 of 1511
Paragraph 6.26

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Details of Changes to be Made:

Yes  Sound  Yes  No  Justified  Effective  Consistent with national policy
Legally Compliant  Yes  No
Details of Reasons for Soundess/ Legal Complaince:
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Yes
Sound
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Effective
Consistent with national policy
Legally Compliant
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Details of Changes to be Made:
Paragraph 6.26

Details of Reasons for Soundess/ Legal Complaince:

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Details of Changes to be Made:

Yes  Sound
No  Justified
Yes  Effective
No  Consistent with national policy

Legally Compliant

Yes  No
Paragraph 6.26

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Yes  Sound

Legally Compliant

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Details of Changes to be Made:
Representation ID
964
Person ID Miss Rouse Agent ID 522471
Paragraph 6.26

Sound  [ ] Yes  [ ] No  [ ] Justified  [ ] Effective  [ ] Consistent with national policy
Legally Compliant  [ ] Yes  [ ] No

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Details of Changes to be Made:

Yes
Sound
Justified
Effective
Consistent with national policy

Legally Compliant
Yes
No
Details of Reasons for Soundess/ Legal Complaince:

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Details of Changes to be Made:
Representation ID
1060
Person ID  Ms  Horton
Agent ID  522485

Paragraph  6.26

Sound  Yes  No  Justified  Effective  Consistent with national policy
Legally Compliant  Yes  No

Details of Reasons for Soundess/ Legal Complaince:
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Details of Changes to be Made:
Paragraph 6.26

Details of Reasons for Soundess/ Legal Complaince:
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Details of Changes to be Made:
### Details of Reasons for Soundess/ Legal Complaince:

The section fails to properly assess the suitability of Stone Cross as a settlement to accommodate future growth whilst recognising the significant development that has occurred in this modest settlement in the last 15 years of the twentieth century. The amalgamation of Stone Cross with Polegate/Willingdon is a disingenuous attempt to improve the credentials of Stone Cross and deflect from the fact that it should not be designated a Service Centre rather a Local Service Centre or Neighbourhood Centre. However the amalgamation of these settlements will be a consequence of the strategy if pursued thus leading to an erosion of local identity and a further erosion of the pattern and character of settlements within the district (see key diagram and the amalgamation of settlement if SD5, SD7 and SD6 go ahead leading to a linear continuance settlement along the A27 as the gaps between Polegate, Stone Cross and Westham are closed) contrary to the stated aims of the Core Strategy (see for example 2.4, 2.7, 2.21 and 3.4)

### Details of Changes to be Made:

Delete reference to Stone Cross and deal with Polegate and Willingdon, remove urban extensions to Stone Cross or significantly amend to reduce the scale of provision at Stone Cross commensurate and proportionate to the settlement size (estimated 3000-4000). replace part of the Stone Cross northern urban extension with a more sustainable extension to the south of Hailsham (300 - 350 homes); which would also be served by the South Hailsham Water Treatment Plant and thus would not introduce any new infrastructure issues beyond those of Stone Cross allocations.

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### Details of Reasons for Soundess/ Legal Complaince:

Polegate and Willingdon: we very much welcome the principle that strategic land release for housing in this area is to be kept further away from the boundaries of the national park. We welcome the wording of para 6.26 to the effect that impact on views from the downs limits the potential for urban extension especially seen against a rural backdrop north and west of Polegate, and that existing main transport routes provide firm limits to expansion in these directions. Having worked hard in support of Wealden Council and others in opposing the Honey Farm development proposal, not least at the recent public inquiry, we very much support the deletion, following the SHLAA of Honey Farm from the locations included within the 2005 non-statutory plan - for all the reasons set out at the inquiry, including the absence of the Folkington Link from any meaningful programme, the recent national park confirmation and the inclusion of Wootton Manor in English heritage's Register of Historic Parks and Gardens

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The Core Strategy is sound and sets out a justified and effective land use strategy for the Polegate area which is consistent with national planning policy. Policy WCS4, Strategic Development Areas, lists as Location SD4 'Land at South Polegate and East Willingdon'. Chapter 6, paragraphs 6.21 to 6.32 and Figure 8 (pages 43-46) show a clear and suitable set of proposals. There is to be no development west of Polegate; housing is proposed to be located in an urban extension south of Polegate and east of Willingdon (Hindslands and Mornings Mill). Paragraph 6.27 of the Core Strategy states: A site was allocated in the 2005 Non Statutory Wealden Local Plan for an urban extension to the north west of Polegate, in the vicinity of Honey Farm. However, this proposal was dependent upon the provision of the Folkington Link and other community infrastructure to enable the integration of development into the town. No such infrastructure has been provided or is known to be planned. Since this allocation the South Downs has achieved National Park status and the adjacent Wootton Manor has formally been included in the English Heritage register of Historic Parks and Gardens. This site has been re-assessed as part of SHLAA and is no longer considered suitable for housing. Figure 8 shows that the land west of Polegate north of the railway line will stay as open countryside adjacent to the National Park. Paragraph 6.27 of the Core Strategy is strongly supported. The Hone Farm or West of Polegate (Pelham Homes) site was included in the Non-Statutory Local Plan in 2004 but that Plan was never subject to a public inquiry. Those affected by the Honey Farm site were not permitted in 2004-05 to oppose it by advancing a different location for the housing, as the opportunity to propose a different location was stated then to be given by the Local Development Framework process in 2005-07. That was delayed and this stage has only now been reached with this Core Strategy. The overwhelming arguments against the Honey Farm location have now been accepted by the District Council. These arguments are: The Honey Farm location would be in isolated development cut off by the A27 trunk road - the 'Folkington Link' no longer being in the trunk road programme; Foot and cycle access to the Honest Farm site would be permanently by footbridges and alleyways directly affecting residents in the Brookside Avenue area of Polegate; The Honey Farm location could not be integrated into the community of Polegate and would be a separate settlement; The setting of the South Downs National Park would be harmed; The setting of the adjacent historic property Wooton Manor, its park and garden would be damaged. The Core Strategy is justified in rejecting the Honey Farm location. The proposed housing location at Hindsland and Morning Mill is sound and justified. If that housing location does not prove to be the best site on further study, the preferred location for housing in the Polegate Town Council Masterplan should be chosen. This is the area north of Polegate and south of the A27 Bypass which is also considered suitable in the 2010 Strategic Housing Land Availability Assessment.

Details of Changes to be Made:
Details of Reasons for Soundess/ Legal Complaince:
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Details of Changes to be Made:

Details of Reasons for Soundess/ Legal Complaince:
Whilst the impact of the previous allocation at Honey Farm has been mentioned and re-assessed as no longer considered suitable for housing, the potential impact of other sites on the setting of the South Downs National Park has not been recognised. It may be that this has already been assessed but it should be recognised as a potential constraint within the proposed core strategy.

Details of Changes to be Made:
Paragraph 6.27

Details of Reasons for Soundness/ Legal Compliance:
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Details of Changes to be Made:
Summary of all Representations - Proposed Submission Core Strategy Regulation 27 - Report 11th July 2011

Representation ID
540

Person ID  Mr Edwards  N/A
106675

Paragraph 6.27

Sound  Yes  No  Justified  Effective  Consistent with national policy

Legally Compliant  Yes  No

Details of Reasons for Soundess/ Legal Complaince:
The Core Strategy is sound and sets out a justified and effective land use strategy for the Polegate area which is consistent with national planning policy. Policy WCS4, Strategic Development Areas, lists as Location SD4 'Land at South Polegate and East Willingdon'. Chapter 6, paragraphs 6.21 to 6.32 and Figure 8 (pages 43-46) show a clear and suitable set of proposals. There is to be no development west of Polegate; housing is proposed to be located in an urban extension south of Polegate and east of Willingdon (Hindslands and Mornings Mill). Paragraph 6.27 of the Core Strategy states: A site was allocated in the 2005 Non Statutory Wealden Local Plan for an urban extension to the north west of Polegate, in the vicinity of Honey Farm. However, this proposal was dependent upon the provision of the Folkington Link and other community infrastructure to enable the integration of development into the town. No such infrastructure has been provided or is known to be planned. Since this allocation the South Downs has achieved National Park status and the adjacent Wootton Manor has formally been included in the English Heritage register of Historic Parks and Gardens. This site has been re-assessed as part of SHLAA and is no longer considered suitable for housing. Paragraph 6.27 of the Core Strategy is strongly supported. The overwhelming arguments against the Honey Farm location have now been accepted by the District Council. These arguments are: The Honey Farm location would be in isolated development cut off by the A27 trunk road - the 'Folkington Link' no longer being in the trunk road programme; Foot and cycle access to the Honest Farm site would be permanently by footbridges and alleyways directly affecting residents in the Brookside Avenue area of Polegate; The Honey Farm location could not be integrated into the community of Polegate and would be a separate settlement; The setting of the South Downs National Park would be harmed; The setting of the adjacent historic property Wootton Manor, its park and garden would be damaged. The Core Strategy is justified in rejecting the Honey Farm location. The proposed housing location at Hindsland and Morning Mill is sound and justified. Polegate area is over-populated as it is.

Details of Changes to be Made:
Details of Reasons for Soundess/ Legal Complaince:

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Details of Changes to be Made:
Paragraphs 6.21 - 6.30 of the document provide further information to support the Council’s policy approach towards further development at Stone Cross and this is supported. Text at paragraph 6.31 identifies the potential split in housing delivery between the two strategic development areas of Stone Cross (SD6 and SD7) although it is noted that there is flexibility here subject to the local highway improvements required to accommodate the development. This flexibility within the overall strategy to deal with changing circumstances is welcomed and is considered to ensure the Core Strategy is effective in line with the requirements of paragraphs 4.44 and 4.46 of PPS12. Sites north of Rattle Road, east of Stone Cross within SD6 have been determined within the SHLAA to be deliverable housing sites. It is acknowledged that the development of these sites would have a limited impact on the landscape and that structural planning can mitigate any local impact as well as protect against potentially conflicting land uses. Between the two sites in the SHLAA east of Stone Cross, north of Rattle Road, the landowners are collaborating with regard to access and evidence of this will be forwarded to the District Council in due course. Likewise, a Phase 1 Habitats Survey has been commissioned to support the general masterplan development of this location and again this will be forwarded to the Council following its completion to provide further evidence of the suitability of this location for development. As the Council will be aware, my client's land (The Oaks, Rattle Road - SHLAA ref: 415/3280) fronts directly onto Rattle Road, is in the control of one single landowner, can be brought forward for development at any time and to the best of our knowledge is free from any environmental constraint. In this respect, we consider its inclusion within the identified SD6 Strategic Development Area is sensible and reflects a sound approach that will contribute to ensuring the Core Strategy is deliverable, founded on a robust and credible evidence base and is the most appropriate strategy when considered against the reasonable alternatives. The Council has engaged with the community in its consultations on the Issues and Options Paper 2007 and the Spatial Development Options Consultation in 2009. The comments from these consultations, particularly with regard to the need for affordable housing, have been reflected in the emerging policies. We are also aware that the Council continues to engage with Parish Councils in the area, including Jevington and Westham Parish Councils, to help reflect their vision for the settlements and service provision. As a result I agree that the Core Strategy is generally sound (subject to my comments concerning Policy WCS1), and demonstrates effectiveness in the delivery of development in this part of the District. I therefore consider Strategic Development Area SD6 in the Proposed Submission Core Strategy to be 'sound' in terms of the tests in Planning Policy Statement 12. I consider it justified, based on credible and robust evidence and effective with regard to delivery and flexibility and is consistent with national policy.

Details of Changes to be Made:

Yes

Sound

Legally Compliant

No

Consistent with national policy

Effective

Justified

In paragraph 6.31 of the document, the potential split in housing delivery between the two strategic development areas of Stone Cross (SD6 and SD7) is acknowledged. It is noted that there is flexibility here subject to the local highway improvements required to accommodate the development. This flexibility within the overall strategy to deal with changing circumstances is welcomed and is considered to ensure the Core Strategy is effective in line with the requirements of paragraphs 4.44 and 4.46 of PPS12. Sites north of Rattle Road, east of Stone Cross within SD6 have been determined within the SHLAA to be deliverable housing sites. It is acknowledged that the development of these sites would have a limited impact on the landscape and that structural planning can mitigate any local impact as well as protect against potentially conflicting land uses. Between the two sites in the SHLAA east of Stone Cross, north of Rattle Road, the landowners are collaborating with regard to access and evidence of this will be forwarded to the District Council in due course. Likewise, a Phase 1 Habitats Survey has been commissioned to support the general masterplan development of this location and again this will be forwarded to the Council following its completion to provide further evidence of the suitability of this location for development. As the Council will be aware, my client's land (The Oaks, Rattle Road - SHLAA ref: 415/3280) fronts directly onto Rattle Road, is in the control of one single landowner, can be brought forward for development at any time and to the best of our knowledge is free from any environmental constraint. In this respect, we consider its inclusion within the identified SD6 Strategic Development Area is sensible and reflects a sound approach that will contribute to ensuring the Core Strategy is deliverable, founded on a robust and credible evidence base and is the most appropriate strategy when considered against the reasonable alternatives. The Council has engaged with the community in its consultations on the Issues and Options Paper 2007 and the Spatial Development Options Consultation in 2009. The comments from these consultations, particularly with regard to the need for affordable housing, have been reflected in the emerging policies. We are also aware that the Council continues to engage with Parish Councils in the area, including Jevington and Westham Parish Councils, to help reflect their vision for the settlements and service provision. As a result I agree that the Core Strategy is generally sound (subject to my comments concerning Policy WCS1), and demonstrates effectiveness in the delivery of development in this part of the District. I therefore consider Strategic Development Area SD6 in the Proposed Submission Core Strategy to be 'sound' in terms of the tests in Planning Policy Statement 12. I consider it justified, based on credible and robust evidence and effective with regard to delivery and flexibility and is consistent with national policy.
Details of Reasons for Soundess/ Legal Complaince:
The section fails to properly assess the suitability of Stone Cross as a settlement to accommodate future growth whilst recognising the significant development that has occurred in this modest settlement in the last 15 years of the twentieth century. The amalgamation of Stone Cross with Polegate/Willingdon is a disingenuous attempt to improve the credentials of Stone Cross and deflect from the fact that it should not be designated a Service Centre rather a Local Service Centre or Neighbourhood Centre. However the amalgamation of these settlements will be a consequence of the strategy if pursued thus leading to an erosion of local identity and a further erosion of the pattern and character of settlements within the district (see key diagram and the amalgamation of settlement if SD5, SD7 and SD6 go ahead leading to a linear continuance settlement along the A27 as the gaps between Polegate, Stone Cross and Westham are closed) contrary to the stated aims of the Core Strategy (see for example 2.4, 2.7, 2.21 and 3.4)

Details of Changes to be Made:
Delete reference to Stone Cross and deal with Polegate and Willingdon, remove urban extensions to Stone Cross or significantly amend to reduce the scale of provision at Stone Cross commensurate and proportionate to the settlement size (estimated 3000-4000). replace part of the Stone Cross northern urban extension with a more sustainable extension to the south of Hailsham (300 - 350 homes); which would also be served by the South Hailsham Water Treatment Plant and thus would not introduce any new infrastructure issues beyond those of Stone Cross allocations.
Details of Reasons for Soundess/ Legal Complaince:
The Core Strategy is sound and sets out a justified and effective land use strategy for the Polegate area which is consistent with national planning policy. Policy WCS4, Strategic Development Areas, lists as Location SD4 'Land at South Polegate and East Willingdon'. Chapter 6, paragraphs 6.21 to 6.32 and Figure 8 (pages 43-46) show a clear and suitable set of proposals. There is to be no development west of Polegate; housing is proposed to be located in an urban extension south of Polegate and east of Willingdon (Hindslands and Mornings Mill). Paragraph 6.27 of the Core Strategy states: A site was allocated in the 2005 Non Statutory Wealden Local Plan for an urban extension to the north west of Polegate in the vicinity of Honey Farm. However, this proposal was dependent upon the provision of the Folkington Link and other community infrastructure to enable the integration of development into the town. No such infrastructure has been provided or is known to be planned. Since this allocation for South Downs has achieved National Park status and the adjacent Wootton Manor has formally been included in the English Heritage Register of Historic Parks and Gardens. This site has been re-assessed as part of SHLAA and is no longer considered suitable for housing. Paragraph 6.27 of the Core Strategy is strongly supported. The overwhelming arguments against the Honey Farm Location have now been accepted by the District Council. These arguments are: 1. The Honey Farm location would be an isolated development cut off by the A27 trunk road - the 'Folkington Link' no longer being in the trunk road programme. 2. Foot and cycle access to the Honey Farm site would be permanently by footbridges and alleyways directly affecting residents in the Brookside Avenue area of Polegate. 3. The Honey Farm location could not be integrated into the community of Polegate and would be a separate settlement. 4. The setting of the South Downs National Park would be harmed. 5. The setting of the adjacent historic property Wootton Manor, its park and garden would be damaged. The Core Strategy is justified in rejecting the Honey Farm location. The proposed housing location at Hindslands and Mornings Mill is sound and justified.

Details of Changes to be Made:
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☑
Legally Compliant
☐
Justified
☐
Effective
☐
Consistent with national policy

Page 1089 of 1511
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Legally Compliant

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Details of Changes to be Made:
Representation ID
953
Person ID   Miss Evans
Agent ID
522470
Paragraph   6.27

Sound ☑ Yes ☐ No ☐ Justified ☐ Effective ☐ Consistent with national policy
Legally Compliant ☐ Yes ☐ No

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Yes  Sound  Justified  Effective  Consistent with national policy
No  Legally Compliant  Yes  No

Yes  Sound  Justified  Effective  Consistent with national policy
No  Legally Compliant  Yes  No
Details of Reasons for Soundess/ Legal Complaince:

The Core Strategy is sound and sets out a justified and effective land use strategy for the Polegate area which is consistent with national planning policy. Policy WCS4, Strategic Development Areas, list as Location SD4 'Land at South Polegate and East Willingdon' Chapter 6, paragraphs 6.21 to 6.32 and Figure 8 (pages 43-46) show a clear and suitable set of proposals. There is to be no development west of Polegate; housing is proposed to be located in an urban extension south of Polegate and east of Willingdon (Hindslands and Mornings Mill). Paragraph 6.27 of the Core Strategy states: A site was allocated in the 2005 Non Statutory Wealden Local Plan for an urban extension to the north west of Polegate in the vicinity of Honey Farm. However, this proposal was dependent upon the provision of the Folkington Link and other community infrastructure to enable the integration of development into the town. No such infrastructure has been provided or is known to be planned. Since this allocation for South Downs has achieved National Park status and the adjacent Wootton Manor has formally been included in the English Heritage Register of Historic Parks and Gardens. This site has been re-assessed as part of SHLAA and is no longer considered suitable for housing. Figure 8 shows that the land west of Polegate north of the railway line will stay as open countryside adjacent to the National Park. Paragraph 6.27 of the Core Strategy is strongly supported. The Honey Farm of West of Polegate (Pelham Homes) site was included in the Non-Statutory Local Plan in 2004 but that Plan was never subject to a Public Inquiry. Those affected by the Honey Farm Site were not permitted in 2004-05 to oppose it by advancing a different location for the housing, as the opportunity to propose a different location was stated then to be given by the Local Development Framework process in 2005 - 07. That was delayed and this stage has only now been reached with this Core Strategy. The overwhelming arguments against the Honey Farm location have now been accepted by the District Council. These arguments are: 1. The Honey Farm location would be an isolated development cut off by the A27 trunk road - the 'Folkington Link' no longer being in the trunk road programme. 2. Foot and cycle access to the Honey Farm site would be permanently by footbridges and alleyways directly affecting residents in the Brookside Avenue area of Polegate. 3. The Honey Farm location could not be integrated into the community of Polegate and would be a separate settlement. 4. The setting of the South Downs National Park would be harmed. 5. The setting of the adjacent historic property Wootton Manor, its park and garden would be damaged. The Core Strategy is justified in rejecting the Honey Farm location. The proposed housing location at Hindsland and Mornings Mill is sound and justified. If that housing location does not prove to be the best site on further study, the preferred location for housing in the Polegate Town Council Masterplan should be chosen. This is the area north of Polegate and south of the A27 bypass which is also considered suitable in the 2010 Strategic Housing Lane Availability Assessment.

Details of Changes to be Made:

- Yes
- Sound
- No
- Justified
- Effective
- Consistent with national policy
- Legally Compliant
- Yes
- No
Details of Reasons for Soundess/ Legal Complaince:
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Details of Reasons for Soundness/ Legal Complaince:
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Details of Changes to be Made:

Representation ID
804

Person ID  
Mr & Flittner

Agent ID
106034

Paragraph  
6.27

Sound  
☑ Yes  ☐ No  ☐ Justified  ☑ Effective  ☐ Consistent with national policy

Legally Compliant  
☐ Yes  ☐ No

Details of Reasons for Soundess/ Legal Complaince:
The council’s comments make it clear that these allocations are undeliverable as things stand at the moment, and they seem to have no idea how and if it will be possible to overcome the identified constraints regarding the roads and waste water infrastructure. There these allocations are unsound and contrary to national policy and SHLAA criteria.

Details of Changes to be Made:
These allocations should be deleted and reallocated to deliverable and sustainable sites.
Details of Reasons for Soundness/ Legal Compliance:

Polegate and Willingdon: we very much welcome the principle that strategic land release for housing in this area is to be kept further away from the boundaries of the national park. We welcome the wording of para 6.26 to the effect that impact on views from the downs limits the potential for urban extension especially seen against a rural backdrop north and west of Polegate, and that existing main transport routes provide firm limits to expansion in these directions. Having worked hard in support of Wealden Council and others in opposing the Honey Farm development proposal, not least at the recent public inquiry, we very much support the deletion, following the SHLAA of Honey Farm from the locations included within the 2005 non-statutory plan - for all the reasons set out at the inquiry, including the absence of the Folkington Link from any meaningful programme, the recent national park confirmation and the inclusion of Wootton Manor in English heritage's Register of Historic Parks and Gardens.

Details of Changes to be Made:
Paragraph 6.27

Details of Reasons for Soundess/ Legal Complaince:

"Supplementary documents have been submitted but not attached, and may be viewed at the Council offices on request". The Council has undertaken a SHLAA exercise and has identified sufficient land for a total of 22,000 dwellings which can be built during the plan period. The Council has prepared a SHLAA under the guidance of a Housing market Partnership including house builders, Housing Associations planning agents the Environment Agency the Sussex Wildlife Trust and East Sussex County Council. The Appellants have not been involved in this process and object strongly to the omission of the appeal site from the SHLAA. At a recent public inquiry the Council were unable to substantiate the claims made in this paragraph concerning the Honey Farm site. In particular the site is not dependent on the completion of the Folkington Link and a Highways SoCG signed by both East Sussex County Council and the Highways Agency agreed this point. furthermore, the landscape appraisal of the Polegate sites appended demonstrates that the Honey Farm site (PW1 west of the A22 at Polegate) is preferable to the other sites in the Draft Core Strategy as proposed by the Council.

Details of Changes to be Made:

The Council also states that since the allocation the South Downs has achieved National Park status and the adjacent Wootton Manor has formally be included in the English Heritage register of Historic Parks and Gardens. And "this site has been re-assessed as part of SHLAA and is not longer considered suitable for housing" The methodology of the SHLAA has specifically excluded consideration of planning policy matters in respect of the sites under consideration and includes sites which are actually within both the AONB and the National Park designated areas. It is, therefore, not acceptable that the PW1 site should be excluded on either the change of status of the Wootton Manor land or the change in designation of the South Downs (which the site does not even adjoining) from AONB to National Park. these issues are matters which should be balanced as part of the allocation process when the merits of various sites identified within the SHLAA can be compared. In any event at the recent Honey Farm (PW1) Inquiry in respect of an appeal agains the refusal of planning permission for the PW1 site the Council's witness acknowledged under cross examination that the registration of the Wootton Manor gardens occurred before the PW1 site was allocated and in terms of landscape under Government guidance PPS7 in landscape matters AONB status carries similar weight to National Park status. With regard to access facilities, public transport etc and whether a site is suitable for housing development these factors are not identified in any part of the SHLAA (See Stage 7a page 11, suitability for housing assessment). It is therefore, patently wrong that the PW1 site should have been assessed as not being suitable on this basis. This is particularly the case because there are sites in the Polegate area which are significantly less accessible to facilities in Polegate, including the railway station, shops etc. and these remain in the SHLAA. REVISION SOUGHT Delete paragraph.
Details of Reasons for Soundness/ Legal Compliance:

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Details of Changes to be Made:

Yes  Sound  No  Justified  Effective  Consistent with national policy
Yes  Legally Compliant  No
Representation ID
241
Person ID     Mrs Tomlinson
Agent ID
521465
Paragraph 6.28
Details of Reasons for Soundness/ Legal Complaince:
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Details of Changes to be Made:

Yes ☑️ Yes ☑️ No ☐️ Justified ☐️ Effective ☐️ Consistent with national policy
Legally Compliant ☐️ Yes ☑️ No
Paragraph 6.28

Details of Reasons for Soundess/ Legal Complaince:
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Details of Changes to be Made:
Paragraph 6.28

Details of Reasons for Soundess/ Legal Complaince:

Paragraphs 6.21 - 6.30 of the document provide further infromation to support the Council's policy approach towards further development at Stone Cross and this is supported. Text at paragraph 6.31 identifies the potential split in housing delivery between the two strategic development areas of Stone Cross (SD6 and SD7) although it is noted that there is flexibility here subject to the local highway improvements required to accomodate the development. This flexibility within the overall strategy to deal with changing circumstances is welcomed and is considered to ensure the Core Strategy is effective in line with the requirments of paragrahs 4.44 and 4.46 of PPS12. Sites north of Rattle Road, east of Stone Cross within SD6 have been determined within the SHLAA to be deliverable housing sites. It is acknowledged that the development of these sites would have a limited impact on the landscape and that structural planning can mitigate any local impact as well as protect against potentially conflicting land uses. Between the two sites in the SHLAA east of Stone Cross, north of Rattle Road, the landowners are collaborating with regard to access and evidence of this will be forwarded to the District council in due course. Likewise, a Phase 1 Habitats Survey has been commissioned to support the general masterplan development of this location and again this will be forwarded to the Council following its completion to provide further evidence of the suitability of this location for development. As the Council will be aware, my client's land (The Oaks, Rattle Road - SLHAA ref: 415/3280) fronts directly onto Rattle Road, is in the control of one single landowner, can be brought forward for development at any time and to the best of our knowledge is free from any environmental constraint. In this respect, we consider its inclusion within the identified SD6 Strategic Development Area is sensible and reflects a sound approach that will contribute to ensuring the Core Strategy is deliverable, founded on a robust and credible evidence base and is the most appropriate strategy when considered against the reasonable alternatives. The Council has engaged with the community in its consultations on the Issues and Options Paper 2007 and the Spatial Development Options Consultation in 2009. The comments from these consultations, particularly with regard to the need for affordable housing, have been reflected in the emerging policies. We are also aware that the Council continues to engage with Parish Councils in the area, including Jevington and Westham Parish Councils, to help reflect their vision for the settlements and service provision. As a result I agree that the Core Strategy is generally sound (subject to my comments concerning Policy WCS1), and demonstrates effectiveness in the delivery of development in this part of the District. I therefore consider Strategic Development Area SD6 in the Proposed Submission Core Strategy to be 'sound' in terms of the tests in Planning Policy Statement 12. I consider it justified, based on credible and robust evidence and effective with regard to delivery and flexibility and is consistent with national policy.

Details of Changes to be Made:

Yes

Sound 

No

Legally Compliant 

Yes

No

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The Core Strategy is sound and sets out a justified and effective land use strategy for the Polegate area which is consistent with national planning policy. Policy WCS4, Strategic Development Areas, lists as Location SD4 'Land at South Polegate and East Willingdon'. Chapter 6, paragraphs 6.21 to 6.32 and Figure 8 (pages 43-46) show a clear and suitable set of proposals. There is to be no development west of Polegate; housing is proposed to be located in an urban extension south of Polegate and east of Willingdon (Hindslands and Mornings Mill). Paragraph 6.27 of the Core Strategy states: A site was allocated in the 2005 Non Statutory Wealden Local Plan for an urban extension to the north west of Polegate, in the vicinity of Honey Farm. However, this proposal was dependent upon the provision of the Folkington Link and other community infrastructure to enable the integration of development into the town. No such infrastructure has been provided or is known to be planned. Since this allocation the South Downs has achieved National Park status and the adjacent Wootton Manor has formally been included in the English Heritage register of Historic Parks and Gardens. This site has been re-assessed as part of SHLAA and is no longer considered suitable for housing. Paragraph 6.27 of the Core Strategy is strongly supported. The overwhelming arguments against the Honey Farm location have now been accepted by the District Council. These arguments are: The Honey Farm location would be in isolated development cut off by the A27 trunk road - the 'Folkington Link' no longer being in the trunk road programme; Foot and cycle access to the Honest Farm site would be permanently by footbridges and alleyways directly affecting residents in the Brookside Avenue area of Polegate; The Honey Farm location could not be integrated into the community of Polegate and would be a separate settlement; The setting of the South Downs National Park would be harmed; The setting of the adjacent historic property Wooton Manor, its park and garden would be damaged. The Core Strategy is justified in rejecting the Honey Farm location. The proposed housing location at Hindsland and Morning Mill is sound and justified.

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Details of Changes to be Made:

Details of Reasons for Soundess/ Legal Complaince:
The council’s comments make it clear that these allocations are undeliverable as things stand at the moment, and they seem to have no idea how and if it will be possible to overcome the identified constraints regarding the roads and wast water infrastructure. There these allocations are unsound and contrary to national policy and SHLAA criteria.

Details of Changes to be Made:
These allocations should be deleted and reallocated to deliverable and sustainable sites.
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Details of Changes to be Made:

Yes  Sound  Justified  Effective  Consistent with national policy

Yes  Legally Compliant  No
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Details of Changes to be Made:
Paragraph 6.28

Details of Reasons for Soundness/ Legal Compliance:
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Details of Changes to be Made:

Yes  Sound
No  Justified
Not Effective
Consistent with national policy

Yes  Legally Compliant
No
Details of Reasons for Soundess/ Legal Complaince:
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Details of Changes to be Made:
Paragraph 6.28

Details of Reasons for Soundness/ Legal Complaint:
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Details of Changes to be Made:

Yes

Sound

Justified

Effective

Consistent with national policy

Legally Compliant

Yes

No

No
Details of Reasons for Soundess/ Legal Complaince:
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Details of Changes to be Made:

Sound  Yes  No  Justified  Effective  Consistent with national policy
Legally Compliant  Yes  No
Details of Reasons for Soundess/ Legal Complaince:
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Details of Changes to be Made:

Paragraph 6.28 add after ......discharge treated waste water...'above an additional 1500 dwellings".
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Details of Changes to be Made:

Yes  Sound
No   Justified
Yes  Effective
No   Consistent with national policy
Legally Compliant
Details of Reasons for Soundess/ Legal Complaince:
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Details of Changes to be Made:
Paragraph 6.28

Details of Reasons for Soundess/ Legal Complaince:
The Core Strategy is sound and sets out a justified and effective land use strategy for the Polegate area which is consistent with national planning policy. Policy WCS4, Strategic Development Areas, lists as Location SD4 'Land at South Polegate and East Willingdon'. Chapter 6, paragraphs 6.21 to 6.32 and Figure 8 (pages 43-46) show a clear and suitable set of proposals. There is to be no development west of Polegate; housing is proposed to be located in an urban extension south of Polegate and east of Willingdon (Hindslands and Mornings Mill). Paragraph 6.27 of the Core Strategy states: A site was allocated in the 2005 Non Statutory Wealden Local Plan for an urban extension to the north west of Polegate in the vicinity of Honey Farm. However, this proposal was dependent upon the provision of the Folkington Link and other community infrastructure to enable the integration of development into the town. No such infrastructure has been provided or is known to be planned. Since this allocation for South Downs has achieved National Park status and the adjacent Wootton Manor has formally been included in the English Heritage Register of Historic Parks and Gardens. This site has been re-assessed as part of SHLAA and is no longer considered suitable for housing. Paragraph 6.27 of the Core Strategy is strongly supported. The overwhelming arguments against the Honey Farm Location have now been accepted by the District Council. These arguments are: 1. The Honey Farm location would be an isloated development cut off by the A27 trunk road - the 'Folkington Link' no longer being in the trunk road programme. 2. Foot and cycle access to the Honey Farm site would be permanently by footbridges and alleyways directly affecting residents in the Brookside Avenue area of Polegate. 3. The Honey Farm location could not be integrated into the community of Polegate and would be a separate settlement. 4. The setting of the South Downs National Park would be harmed. 5. The setting of the adjacent historic property Wootton Manor, its park and garden would be damaged. The Core Strategy is justified in rejecting the Honey Farm location. The proposed housing location at Hindslands and Mornings Mill is sound and justified.

Details of Changes to be Made:
### Representation ID 1168

**Person ID** Mar 533827  
**Agent ID** Mr 533824  
**Representation ID** 1168  
**Person ID** Mark Stephen Limited  
**Agent ID** PHD Chartered Town Planners  

**Paragraph** 6.28  
**Sound** ☐ Yes ☑ No ☑ Justified ☐ Effective ☐ Consistent with national policy  
**Legally Compliant** ☑ Yes ☐ No  

**Details of Reasons for Soundness/ Legal Complaince:**

The section fails to properly assess the suitability of Stone Cross as a settlement to accommodate future growth whilst recognising the significant development that has occurred in this modest settlement in the last 15 years of the twentieth century. The amalgamation of Stone Cross with Polegate/Willingdon is a disingenuous attempt to improve the credentials of Stone Cross and deflect from the fact that it should not be designated a Service Centre rather a Local Service Centre or Neighbourhood Centre. However the amalgamation of these settlements will be a consequence of the strategy if pursued thus leading to an erosion of local identity and a further erosion of the pattern and character of settlements within the district (see key diagram and the amalgamation of settlement if SD5, SD7 and SD6 go ahead leading to a linear continuance settlement along the A27 as the gaps between Polegate, Stone Cross and Westham are closed) contrary to the stated aims of the Core Strategy (see for example 2.4, 2.7, 2.21 and 3.4)

**Details of Changes to be Made:**

Delete reference to Stone Cross and deal with Polegate and Willingdon, remove urban extensions to Stone Cross or significantly amend to reduce the scale of provision at Stone Cross commensurate and proportionate to the settlement size (estimated 3000-4000). replace part of the Stone Cross northern urban extension with a more sustainable extension to the south of Hailsham (300 - 350 homes); which would also be served by the South Hailsham Water Treatment Plant and thus would not introduce any new infrastructure issues beyond those of Stone Cross allocations.

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### Representation ID 1193

**Person ID** Mrs 534595  
**Agent ID** 6.28  
**Representation ID** 1193  
**Person ID** Kelly  
**Agent ID** 6.28  

**Paragraph** 6.28  
**Sound** ☑ Yes ☐ No ☐ Justified ☐ Effective ☐ Consistent with national policy  
**Legally Compliant** ☑ Yes ☐ No  

**Details of Reasons for Soundness/ Legal Complaince:**

The Sustainability Appraisal and other background documents relating to proposed growth at Stone Cross are clear that the level of growth allocated to this settlement is consistent with the remaining headroom at the Hailsham South WWTW. The Core Strategy should be clearer on this point to demonstrate that an additional 650 dwellings can be accommodated within the existing EA discharge licence.

**Details of Changes to be Made:**

Strengthen the wording or para 6.28 to explain that the full 650 dwellings can be delivered without requiring upgrades to Hailsham South WWTW.
We are pleased to see that your development distribution in policy WCS2 can be accommodated within existing consented capacities at Waste Water Treatment Works (WWTW). This is particularly important at the Hailsham North and South Waste Water Treatment Works that discharge into the Pevensey Levels. The Review of Consents As you are already aware, we are currently undertaking a Review of Consents (RoC) for the Pevensey Levels. The purposes of the RoC is to assess the impact of existing discharge consents into the Pevensey Levels, and make suitable changes where appropriate and fully justified. We have currently reached Stage 3 of the RoC which we are awaiting sign off from our Area Manager. We will make these results available to you at the earliest opportunity at the end of April 2011. The results will identify those consents that will require further assessment under the final Stage 4 of the RoC. We expect the final recommendations to be available by April 2012. This will be in time to inform your Site Allocations Development Plan Document. Through the course of the RoC there is a possibility that the existing consent for Hailsham North and South WWTWs will be reviewed which would have implications for the capacity of the works to accept the waste water flows from new development. We are happy that your Strategy is based on the most up to date information available, and you have addressed potential changes to existing consents through the RoC by considering phasing development with the provision of necessary infrastructure. Southern Water have also commissioned a study into alternative solutions for waste water treatment in the south of Wealden should it be needed. We therefore consider your Core Strategy sound in this regard. No Deterioration Policy We are awaiting the publication of a 'No Deterioration' policy from Defra. The policy will seek to achieve the Water Framework Directive (WFD) requirement of achieving good ecological status of all waterbodies and not allowing any deterioration in status. The impact of this Policy is similar to that of the Review of Consents, insofar as there is a potential risk that it will result in existing consents being tightened in line with WFD. Again, without this policy being in place, we are satisfied that your Strategy is based on the best available information and remains sound in this regard. Once the No Deterioration Policy is published we will consider how this will impact on your Site Allocations and the need for waste water infrastructure delivery.

Details of Changes to be Made:

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6.28 states 'development will only be allowed if it can be accommodated by the existing works, unless an alternative location for the treatment and discharge of waste water is implemented'.
Representation ID
256
Person ID  Miss Hunter  
Agent ID 330812
Paragraph 6.29
Sound ☑ Yes ☐ No ☐ Justified ☐ Effective ☐ Consistent with national policy
Legally Compliant ☐ Yes ☐ No

Details of Reasons for Soundess/ Legal Complaince:
The Core Strategy is sound and sets out a justified and effective land use strategy for the Polegate area which is consistent with national planning policy. Policy WCS4, Strategic Development Areas, lists as Location SD4 'Land at South Polegate and East Willingdon'. Chapter 6, paragraphs 6.21 to 6.32 and Figure 8 (pages 43-46) show a clear and suitable set of proposals. There is to be no development west of Polegate; housing is proposed to be located in an urban extension south of Polegate and east of Willingdon (Hindslands and Mornings Mill). Paragraph 6.27 of the Core Strategy states: A site was allocated in the 2005 Non Statutory Wealden Local Plan for an urban extension to the north west of Polegate, in the vicinity of Honey Farm. However, this proposal was dependent upon the provision of the Folkington Link and other community infrastructure to enable the integration of development into the town. No such infrastructure has been provided or is known to be planned. Since this allocation the South Downs has achieved National Park status and the adjacent Wootton Manor has formally been included in the English Heritage register of Historic Parks and Gardens. This site has been re-assessed as part of SHLAA and is no longer considered suitable for housing. Paragraph 6.27 of the Core Strategy is strongly supported. The overwhelming arguments against the Honey Farm location have now been accepted by the District Council. These arguments are: The Honey Farm location would be in isolated development cut off by the A27 trunk road - the 'Folkington Link' no longer being in the trunk road programme; Foot and cycle access to the Honest Farm site would be permanently by footbridges and alleyways directly affecting residents in the Brookside Avenue area of Polegate; The Honey Farm location could not be integrated into the community of Polegate and would be a separate settlement; The setting of the South Downs National Park would be harmed; The setting of the adjacent historic property Wooton Manor, its park and garden would be damaged. The Core Strategy is justified in rejecting the Honey Farm location. The proposed housing location at Hindsland and Morning Mill is sound and justified.

Details of Changes to be Made:
Details of Reasons for Soundess/ Legal Complaince:
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Details of Changes to be Made:

Yes
Sound
Justified
Effective
Consistent with national policy
Legally Compliant
Yes
No
Details of Reasons for Soundess/ Legal Complaince:
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Details of Changes to be Made:
Paragraph 6.29

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Details of Changes to be Made:

- Yes
- Sound
- Yes
- Legally Compliant
- No
- Justified
- Effective
- Consistent with national policy

Paragraph 6.29

Details of Reasons for Soundess/ Legal Complaince:

- Yes
- No
- Justified
- Effective
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- Yes
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Details of Changes to be Made:
Details of Reasons for Soundess/ Legal Complaince:

Paragraphs 6.21 - 6.30 of the document provide further information to support the Council’s policy approach towards further development at Stone Cross and this is supported. Text at paragraph 6.31 identifies the potential split in housing delivery between the two strategic development areas of Stone Cross (SD6 and SD7) although it is noted that there is flexibility here subject to the local highway improvements required to accommodate the development. This flexibility within the overall strategy to deal with changing circumstances is welcomed and is considered to ensure the Core Strategy is effective in line with the requirements of paragraphs 4.44 and 4.46 of PPS12. Sites north of Rattle Road, east of Stone Cross within SD6 have been determined within the SHLAA to be deliverable housing sites. It is acknowledged that the development of these sites would have a limited impact on the landscape and that structural planning can mitigate any local impact as well as protect against potentially conflicting land uses. Between the two sites in the SHLAA east of Stone Cross, north of Rattle Road, the landowners are collaborating with regard to access and evidence of this will be forwarded to the District council in due course. Likewise, a Phase 1 Habitats Survey has been commissioned to support the general masterplan development of this location and again this will be forwarded to the Council following its completion to provide further evidence of the suitability of this location for development. As the Council will be aware, my client’s land (The Oaks, Rattle Road - SLHAA ref: 415/3280) fronts directly onto Rattle Road, is in the control of one single landowner, can be brought forward for development at any time and to the best of our knowledge is free from any environmental constraint. In this respect, we consider its inclusion within the identified SD6 Strategic Development Area is sensible and reflects a sound approach that will contribute to ensuring the Core Strategy is deliverable, founded on a robust and credible evidence base and is the most appropriate strategy when considered against the reasonable alternatives. The Council has engaged with the community in its consultations on the Issues and Options Paper 2007 and the Spatial Development Options Consultation in 2009. The comments from these consultations, particularly with regard to the need for affordable housing, have been reflected in the emerging policies. We are also aware that the Council continues to engage with Parish Councils in the area, including Jevington and Westham Parish Councils, to help reflect their vision for the settlements and service provision. As a result I agree that the Core Strategy is generally sound (subject to my comments concerning Policy WCS1), and demonstrates effectiveness in the delivery of development in this part of the District. I therefore consider Strategic Development Area SD6 in the Proposed Submission Core Strategy to be ‘sound’ in terms of the tests in Planning Policy Statement 12. I consider it justified, based on credible and robust evidence and effective with regard to delivery and flexibility and is consistent with national policy.

Details of Changes to be Made:
Details of Reasons for Soundness/Legal Compliance:
The section fails to properly assess the suitability of Stone Cross as a settlement to accommodate future growth whilst recognising the significant development that has occurred in this modest settlement in the last 15 years of the twentieth century. The amalgamation of Stone Cross with Polegate/Willingdon is a disingenuous attempt to improve the credentials of Stone Cross and deflect from the fact that it should not be designated a Service Centre rather a Local Service Centre or Neighbourhood Centre. However the amalgamation of these settlements will be a consequence of the strategy if pursued thus leading to an erosion of local identity and a further erosion of the pattern and character of settlements within the district (see key diagram and the amalgamation of settlement if SD5, SD7 and SD6 go ahead leading to a linear continuance settlement along the A27 as the gaps between Polegate, Stone Cross and Westham are closed) contrary to the stated aims of the Core Strategy (see for example 2.4, 2.7, 2.21 and 3.4)

Details of Changes to be Made:
Delete reference to Stone Cross and deal with Polegate and Willingdon, remove urban extensions to Stone Cross or significantly amend to reduce the scale of provision at Stone Cross commensurate and proportionate to the settlement size (estimated 3000-4000). replace part of the Stone Cross northern urban extension with a more sustainable extension to the south of Hailsham (300 - 350 homes); which would also be served by the South Hailsham Water Treatment Plant and thus would not introduce any new infrastructure issues beyond those of Stone Cross allocations.
Details of Reasons for Soundess/ Legal Complaince:
The Core Strategy is sound and sets out a justified and effective land use strategy for the Polegate area which is consistent with national planning policy. Policy WCS4, Strategic Developmentt Areas, lists as Location SD4 'Land at South Polegate and East Willingdon'. Chapter 6, paragraphs 6.21 to 6.32 and Figure 8 (pages 43-46) show a clear and suitable set of proposals. There is to be no development west of Polegate; housing is proposed to be located in an urban extension south of Polegate and east of Willingdon (Hindslands and Mornings Mill). Paragraph 6.27 of the Core Strategy states: A site was allocated in the 2005 Non Statutory Wealden Local Plan for an urban extension to the north west of Polegate in the vicinity of Honey Farm. However, this proposal was dependent upon the provision of the Folkington Link and other community infrastructure to enable the integration of development into the town. No such infrastructure has been provided or is known to be planned. Since this allocation for South Downs has achieved National Park status and the adjacent Wootton Manor has formally been included in the English Heritage Register of Historic Parks and Gardens. This site has been re-assessed as part of SHLAA and is no longer considered suitable for housing. Paragraph 6.27 of the Core Strategy is strongly supported. The overwhelming arguments against the Honey Farm Location have now been accepted by the District Council. These arguments are: 1. The Honey Farm location would be an isolated development cut off by the A27 trunk road - the 'Folkington Link' no longer being in the trunk road programme. 2. Foot and cycle access to the Honey Farm site would be permanently by footbridges and alleyways directly affecting residents in the Brookside Avenue area of Polegate. 3. The Honey Farm location could not be integrated into the community of Polegate and would be a separate settlement. 4. The setting of the South Downs National Park would be harmed. 5. The setting of the adjacent historic property Wootton Manor, its park and garden would be damaged. The Core Strategy is justified in rejecting the Honey Farm location. The proposed housing location at Hindslands and Mornings Mill is sound and justified.

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Details of Changes to be Made:

Yes
Sound

Yes
Legally Compliant

Yes
Details of Reasons for Soundness/ Legal Compliance:
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Details of Changes to be Made:
Representation ID
1025

Person ID  Mrs Rowlinson  Agent ID
522482  6.29

Paragraph 6.29

Sound ✓ Yes  ☐ No  ☐ Justified  ☐ Effective  ☐ Consistent with national policy
Legally Compliant  ☐ Yes  ☐ No

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Details of Changes to be Made:
Paragraph 6.3

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Details of Changes to be Made:
Details of Reasons for Soundess/ Legal Complaince:
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Details of Changes to be Made:
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**Details of Reasons for Soundess/ Legal Complaince:**

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Legally Compliant
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No
Paragraph 6.3

Details of Reasons for Soundess/ Legal Complaince:

Paragraphs 6.21 - 6.30 of the document provide further information to support the Council’s policy approach towards further development at Stone Cross and this is supported. Text at paragraph 6.31 identifies the potential split in housing delivery between the two strategic development areas of Stone Cross (SD6 and SD7) although it is noted that there is flexibility here subject to the local highway improvements required to accommodate the development. This flexibility within the overall strategy to deal with changing circumstances is welcomed and is considered to ensure the Core Strategy is effective in line with the requirements of paragraphs 4.44 and 4.46 of PPS12. Sites north of Rattle Road, east of Stone Cross within SD6 have been determined within the SHLAA to be deliverable housing sites. It is acknowledged that the development of these sites would have a limited impact on the landscape and that structural planning can mitigate any local impact as well as protect against potentially conflicting land uses. Between the two sites in the SHLAA east of Stone Cross, north of Rattle Road, the landowners are collaborating with regard to access and evidence of this will be forwarded to the District council in due course. Likewise, a Phase 1 Habitats Survey has been commissioned to support the general masterplan development of this location and again this will be forwarded to the Council following its completion to provide further evidence of the suitability of this location for development. As the Council will be aware, my client’s land (The Oaks, Rattle Road - SLHAA ref: 415/3280) fronts directly onto Rattle Road, is in the control of one single landowner, can be brought forward for development at any time and to the best of our knowledge is free from any environmental constraint. In this respect, we consider its inclusion within the identified SD6 Strategic Development Area is sensible and reflects a sound approach that will contribute to ensuring the Core Strategy is deliverable, founded on a robust and credible evidence base and is the most appropriate strategy when considered against the reasonable alternatives. The Council has engaged with the community in its consultations on the Issues and Options Paper 2007 and the Spatial Development Options Consultation in 2009. The comments from these consultations, particularly with regard to the need for affordable housing, have been reflected in the emerging policies. We are also aware that the Council continues to engage with Parish Councils in the area, including Jevington and Westham Parish Councils, to help reflect their vision for the settlements and service provision. As a result I agree that the Core Strategy is generally sound (subject to my comments concerning Policy WCS1), and demonstrates effectiveness in the delivery of development in this part of the District. I therefore consider Strategic Development Area SD6 in the Proposed Submission Core Strategy to be 'sound' in terms of the tests in Planning Policy Statement 12. I consider it justified, based on credible and robust evidence and effective with regard to delivery and flexibility and is consistent with national policy.

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Details of Changes to be Made:
Details of Reasons for Soundess/ Legal Compliance:

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Details of Changes to be Made:

Details of Reasons for Soundess/ Legal Compliance:
The council;s comments make it clear that these allocations are undeliverable as things stand at the moment, and they seem to have no idea how and if it will be possible to overcome the identified constraints regarding the roads and wast water infrastructure. There these allocations are unsound and contrary to national policy and SHLAA criteria.

Details of Changes to be Made:
These allocations should be deleted and reallocated to deliverable and sustainable sites.
Paragraph 6.3

Details of Reasons for Soundess/ Legal Compliance:
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Yes
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Legally Compliant

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Yes

Sound  Justified  Effective  Consistent with national policy
No

Legally Compliant  Yes  No

Yes

No
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Consistent with national policy

Legally Compliant

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Details of Changes to be Made:
1. The Core Strategy's proposal for a Broad Location south of Polegate and east of Willingdon, shown in Figure 8 and discussed at paragraphs 6.30-6.31, is not sound. 2. The broad housing locations shown in the Draft Core Strategy in October 2010 were (a) to the north of Polegate and (b) to the south of Polegate and east of Willingdon. It was indicated then that no choice between them was as yet possible. 3. The Sustainability Appraisal of the Plan Alternatives sets out the findings on the two broad locations in the summary table at p96, under 'Broad Locations Polegate'. Both 'North' and 'South Polegate and East Willingdon' are listed as 'selected'. 4. However, the Submitted Core Strategy approved for consultation in December 2010, the only option offered at Polegate as a broad location is the land south of Polegate and east of Willingdon (Hindslands and Mornings Mill). 5. The Sustainability Assessment (Background Paper 5) at pp39-41 analyses both the broad locations against a list of objectives the summary table (at p96) demonstrates that both perform sufficiently well to meet the aims of the Strategy. A detailed response on the Sustainability Assessment entries for Polegate broad locations is attached at Appendix 1. 6. The Core Strategy at para 6.30 does not give adequate reasons, or justify, the choice of the broad location south of Polegate / east of Willingdon over the alternative location north of Polegate. It states only that the Sustainability Appraisal 'favoured' the former. 7. the south of Polegate / east of Willingdon location needs to be compared with the alternative north of Polegate location in terms of: a. the preference of local opinion b. the effect on local, and nationally important, landscape c. the traffic impact. Local Opinion 8. The Polegate Town Masterplan supports the north of Polegate location. The Background Paper 'Summary of Town Masterplanning documents' at pp15-17, Polegate Masterplan, states (para 6.10): Polegate Town Council supports the 'suitable' sites identified in the SHLAA with the proviso that Hindslands Fields Eastbourne Road should only be considered for the provision of a new educational facility and not housing. Future development should only take place south of the A27 Bypass and should include a good mix of dwellings and should be of appropriate design to fit in with the existing character of the area. 9. The Government policy principle of localism, which aims to give weight to local opinion and allow local people to determine the future for their area, supports giving weight to the local council's preference for the north of Polegate location for new housing instead of the south of Polegate (Hindslands Fields) site. Comparison of impacts on local and national important landscape 10. The landscape impact of the north of Polegate location would be less than that of the south of Polegate / east of Willingdon alternative. It would be out of view of the South Downs; whereas the south of Polegate / east of Willingdon location would be highly visible from the publicly-owned and accessible Coombe Hill. the impact on the views from and setting of the National Park would be negligible; the impact of the south of Polegate / east of Willingdon location on these views and settings would be large. 11. the north of Polegate locations has not been subject to a landscape appraisal since the A27 Polegate Bypass was opened in 2002. The Polegate Bypass has changed the landscape character of the land south of the bypass. Mounding and planting have created an enclosed area which is not easily visible from the surrounding countryside. In the decade since the bypass was completed, the land has become well-screened and more suitable for development. Comparison of traffic impacts. 12. The South Wealden and Eastbourne Transport Study (SWETS) at Phase 1 included the land north of Polegate. Its general conclusion was that the scenarios that included this broad location could be served by the existing and committed transport infrastructure. 13. In Phase 3 of SWETS the broad location south of Polegate / east of Willingdon was included and assessed in detail. The transport assessment is stated to show that 700 dwellings and employment could be accommodated at that location (CS para 6.30); but there is considerable concern at the impact of that location on local roads and junctions. 14. TheSWETS Report indicates that the north of Polegate location does not need additional transport infrastructure of the same type. It would thus be more effective and justified in transport terms than the south of Polegate / east of Willingdon location, which would add to problems on the local road system. Lack of public participation 15. there was no public participation on the choice of broad house location at Polegate before the Submission Core Strategy was approved and published. Local opinion should be consulted on the choice between the two broad locations which were selected as suitable in the Sustainability Appraisal of Plan Alternatives. 16. the principle of locating some 700 house at Polegate should be included in the Core Strategy as sound; the choice between the two locations assessed should be made through a Strategic Sites Development Plan Document which should follow the Core Strategy. Details of Changes to be Made: 17. The Draft Proposed Submission Core Strategy Policy WCS4 (p40) lists location SD4 as 'Land at Polegate/Willingdon'. This is the wording that should be restored to the text of the Core Strategy to make it sound.
18. Figure 8 should be amended to delete the broad location notation (red colour) at the south of Polegate / east of Willingdon location; the notation in the October 2010 draft Core Strategy Fig 8 should be restored to indicate that both north of Polegate and south of Polegate / east of Willingdon locations are potential strategic housing locations.

### Representation ID

992

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<thead>
<tr>
<th>Person ID</th>
<th>Ms White</th>
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Paragraph 6.3

**Sound**: Yes  No  Justified  Effective  Consistent with national policy

**Legally Compliant**: Yes  No

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- Legally Compliant: Yes  No
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The Core Strategy is sound and sets out a justified and effective land use strategy for the Polegate area which is consistent with national planning policy. Policy WCS4, Strategic Developmentt Areas, lists as Location SD4 'Land at South Polegate and East Willingdon'. Chapter 6, paragraphs 6.21 to 6.32 and Figure 8 (pages 43-46) show a clear and suitable set of proposals. There is to be no development west of Polegate; housing is proposed to be located in an urban extension south of Polegate and east of Willingdon (Hindslands and Mornings Mill). Paragraph 6.27 of the Core Strategy states: A site was allocated in the 2005 Non Statutory Wealden Local Plan for an urban extension to the north west of Polegate in the vicinity of Honey Farm. However, this proposal was dependent upon the provision of the Folkington Link and other community infrastructure to enable the integration of development into the town. No such infrastructure has been provided or is known to be planned. Since this allocation for South Downs has achieved National Park status and the adjacent Wootton Manor has formally been included in the English Heritage Register of Historic Parks and Gardens. This site has been re-assessed as part of SHLAA and is no longer considered suitable for housing. Paragraph 6.27 of the Core Strategy is strongly supported. The overwhelming arguments against the Honey Farm Location have now been accepted by the District Council. These arguments are: 1. The Honey Farm location would be an isolated development cut off by the A27 trunk road - the 'Folkington Link' no longer being in the trunk road programme. 2. Foot and cycle access to the Honey Farm site would be permanently by footbridges and alleyways directly affecting residents in the Brookside Avenue area of Polegate. 3. The Honey Farm location could not be integrated into the community of Polegate and would be a separate settlement. 4. The setting of the South Downs National Park would be harmed. 5. The setting of the adjacent historic property Wootton Manor, its park and garden would be damaged. The Core Strategy is justified in rejecting the Honey Farm location. The proposed housing location at Hindslands and Mornings Mill is sound and justified.

Details of Changes to be Made:
Summary of all Representations - Proposed Submission Core Strategy Regulation 27 - Report 11th July 2011

Representation ID
1040

Person ID  Mrs Hancock  Agent ID
522483  6.3

Sound ☑ Yes ☐ No ☐ Justified ☐ Effective ☐ Consistent with national policy
Legally Compliant ☐ Yes ☐ No

Details of Reasons for Soundess/ Legal Complaince:
The Core Strategy is sound and sets out a justified and effective land use strategy for the Polegate area which is consistent with national planning policy. Policy WCS4, Strategic Development Areas, lists as Location SD4 'Land at South Polegate and East Willingdon'. Chapter 6, paragraphs 6.21 to 6.32 and Figure 8 (pages 43-46) show a clear and suitable set of proposals. There is to be no development west of Polegate; housing is proposed to be located in an urban extension south of Polegate and east of Willingdon (Hindslands and Mornings Mill). Paragraph 6.27 of the Core Strategy states: A site was allocated in the 2005 Non Statutory Wealden Local Plan for an urban extension to the north west of Polegate in the vicinity of Honey Farm. However, this proposal was dependent upon the provision of the Folkington Link and other community infrastructure to enable the integration of development into the town. No such infrastructure has been provided or is known to be planned. Since this allocation for South Downs has achieved National Park status and the adjacent Wootton Manor has formally been included in the English Heritage Register of Historic Parks and Gardens. This site has been re-assessed as part of SHLAA and is no longer considered suitable for housing. Paragraph 6.27 of the Core Strategy is strongly supported. The overwhelming arguments against the Honey Farm Location have now been accepted by the District Council. These arguments are: 1. The Honey Farm location would be an isloated development cut off by the A27 trunk road - the 'Folkington Link' no longer being in the trunk road programme. 2. Foot and cycle access to the Honey Farm site would be permanently by footbridges and alleyways directly affecting residents in the Brookside Avenue area of Polegate. 3. The Honey Farm location could not be integrated into the community of Polegate and would be a separate settlement. 4. The setting of the South Downs National Park would be harmed. 5. The setting of the adjacent historic property Wootton Manor, its park and garden would be damaged. The Core Strategy is justified in rejecting the Honey Farm location. The proposed housing location at Hindslands and Mornings Mill is sound and justified.

Details of Changes to be Made:
Paragraph 6.3

Details of Reasons for Soundness/ Legal Complaince:
The section fails to properly assess the suitability of Stone Cross as a settlement to accommodate future growth whilst recognising the significant development that has occurred in this modest settlement in the last 15 years of the twentieth century. The amalgamation of Stone Cross with Polegate/Willingdon is a disingenuous attempt to improve the credentials of Stone Cross and deflect from the fact that it should not be designated a Service Centre rather a Local Service Centre or Neighbourhood Centre. However the amalgamation of these settlements will be a consequence of the strategy if pursued thus leading to an erosion of local identity and a further erosion of the pattern and character of settlements within the district (see key diagram and the amalgamation of settlement if SD5, SD7 and SD6 go ahead leading to a linear continuance settlement along the A27 as the gaps between Polegate, Stone Cross and Westham are closed) contrary to the stated aims of the Core Strategy (see for example 2.4, 2.7, 2.21 and 3.4)

Details of Changes to be Made:
Delete reference to Stone Cross and deal with Polegate and Willingdon, remove urban extensions to Stone Cross or significantly amend to reduce the scale of provision at Stone Cross commensurate and proportionate to the settlement size (estimated 3000-4000). replace part of the Stone Cross northern urban extension with a more sustainable extension to the south of Hailsham (300 - 350 homes); which would also be served by the South Hailsham Water Treatment Plant and thus would not introduce any new infrastructure issues beyond those of Stone Cross allocations.

Details of Reasons for Soundness/ Legal Complaince:
The attached plan identifies the area of land referred to online prepresentation ID49 and 50

Details of Changes to be Made:
Plan attached in support of the Rep ID No 49 and 50
Paragraph 6.3
Details of Reasons for Soundness/ Legal Complaince:
"Supplementary documents have been submitted but not attached, and may be viewed at the Council offices on request". Paragraph 6.30: Amend to reflect transport and landscape notes appended to this response.

Details of Changes to be Made:
REVISION SOUGHT Delete paragraph and replace with: "Three broad housing locations have been identified in the Polegate/Willingdon area. One to the west of Polegate, one north of the existing bypass and a third to the south of Polegate and east of Willingdon".

Yes
Sound
No
Justified
Effective
Consistent with national policy

Legally Compliant
Yes
No

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Paragraph 6.31
Details of Reasons for Soundness/ Legal Complaince:
The Core Strategy is sound and sets out a justified and effective land use strategy for the Polegate area which is consistent with national planning policy. Policy WCS4, Strategic Development Areas, lists as Location SD4 'Land at South Polegate and East Willingdon'. Chapter 6, paragraphs 6.21 to 6.32 and Figure 8 (pages 43-46) show a clear and suitable set of proposals. There is to be no development west of Polegate; housing is proposed to be located in an urban extension south of Polegate and east of Willingdon (Hindslands and Mornings Mill). Paragraph 6.27 of the Core Strategy states: A site was allocated in the 2005 Non Statutory Wealden Local Plan for an urban extension to the north west of Polegate, in the vicinity of Honey Farm. However, this proposal was dependent upon the provision of the Folkington Link and other community infrastructure to enable the integration of development into the town. No such infrastructure has been provided or is known to be planned. Since this allocation the South Downs has achieved National Park status and the adjacent Wootton Manor has formally been included in the English Heritage register of Historic Parks and Gardens. This site has been re-assessed as part of SHLAA and is no longer considered suitable for housing. Paragraph 6.27 of the Core Strategy is strongly supported. The overwhelming arguments against the Honey Farm location have now been accepted by the District Council. These arguments are: The Honey Farm location would be in isolated development cut off by the A27 trunk road - the 'Folkington Link' no longer being in the trunk road programme; Foot and cycle access to the Honest Farm site would be permanently by footbridges and alleyways directly affecting residents in the Brookside Avenue area of Polegate; The Honey Farm location could not be integrated into the community of Polegate and would be a separate settlement; The setting of the South Downs National Park would be harmed; The setting of the adjacent historic property Wooton Manor, its park and garden would be damaged. The Core Strategy is justified in rejecting the Honey Farm location. The proposed housing location at Hindsland and Morning Mill is sound and justified.

Details of Changes to be Made:
Details of Reasons for Soundness/ Legal Compliance:

The Core Strategy is sound and sets out a justified and effective land use strategy for the Polegate area which is consistent with national planning policy. Policy WCS4, Strategic Development Areas, lists as Location SD4 'Land at South Polegate and East Willingdon'. Chapter 6, paragraphs 6.21 to 6.32 and Figure 8 (pages 43-46) show a clear and suitable set of proposals. There is to be no development west of Polegate; housing is proposed to be located in an urban extension south of Polegate and east of Willingdon (Hindslands and Mornings Mill). Paragraph 6.27 of the Core Strategy states: A site was allocated in the 2005 Non Statutory Wealden Local Plan for an urban extension to the north west of Polegate, in the vicinity of Honey Farm. However, this proposal was dependent upon the provision of the Folkington Link and other community infrastructure to enable the integration of development into the town. No such infrastructure has been provided or is known to be planned. Since this allocation the South Downs has achieved National Park status and the adjacent Wootton Manor has formally been included in the English Heritage register of Historic Parks and Gardens. This site has been re-assessed as part of SHLAA and is no longer considered suitable for housing. Paragraph 6.27 of the Core Strategy is strongly supported. The overwhelming arguments against the Honey Farm location have now been accepted by the District Council. These arguments are: The Honey Farm location would be in isolated development cut off by the A27 trunk road - the 'Folkington Link' no longer being in the trunk road programme; Foot and cycle access to the Honest Farm site would be permanently by footbridges and alleyways directly affecting residents in the Brookside Avenue area of Polegate; The Honey Farm location could not be integrated into the community of Polegate and would be a separate settlement; The setting of the South Downs National Park would be harmed; The setting of the adjacent historic property Wooton Manor, its park and garden would be damaged. The Core Strategy is justified in rejecting the Honey Farm location. The proposed housing location at Hindsland and Morning Mill is sound and justified.

Details of Changes to be Made:
Details of Reasons for Soundess/ Legal Complaince:

The Core Strategy is sound and sets out a justified and effective land use strategy for the Polegate area which is consistent with national planning policy. Policy WCS4, Strategic Development Areas, lists as Location SD4 'Land at South Polegate and East Willingdon'. Chapter 6, paragraphs 6.21 to 6.32 and Figure 8 (pages 43-46) show a clear and suitable set of proposals. There is to be no development west of Polegate; housing is proposed to be located in an urban extension south of Polegate and east of Willingdon (Hindslands and Mornings Mill). Paragraph 6.27 of the Core Strategy states: A site was allocated in the 2005 Non Statutory Wealden Local Plan for an urban extension to the north west of Polegate, in the vicinity of Honey Farm. However, this proposal was dependent upon the provision of the Folkington Link and other community infrastructure to enable the integration of development into the town. No such infrastructure has been provided or is known to be planned. Since this allocation the South Downs has achieved National Park status and the adjacent Wootton Manor has formally been included in the English Heritage register of Historic Parks and Gardens. This site has been re-assessed as part of SHLAA and is no longer considered suitable for housing. Paragraph 6.27 of the Core Strategy is strongly supported. The overwhelming arguments against the Honey Farm location have now been accepted by the District Council. These arguments are: The Honey Farm location would be in isolated development cut off by the A27 trunk road - the 'Folkington Link' no longer being in the trunk road programme; Foot and cycle access to the Honest Farm site would be permanently by footbridges and alleyways directly affecting residents in the Brookside Avenue area of Polegate; The Honey Farm location could not be integrated into the community of Polegate and would be a separate settlement; The setting of the South Downs National Park would be harmed; The setting of the adjacent historic property Wooton Manor, its park and garden would be damaged. The Core Strategy is justified in rejecting the Honey Farm location. The proposed housing location at Hindsland and Morning Mill is sound and justified.

Details of Changes to be Made:
Details of Reasons for Soundess/ Legal Complaince:

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Details of Changes to be Made:
Paragraph 6.31

Details of Reasons for Soundness/Legal Compliance:
I believe that the proposal to allow 700 dwellings + other sundries on area SD4 flies in the face of PPG 12 section 2.4 "orchestrates the necessary social, physical and green infrastructure to ensure sustainable communities are delivered" The development will eliminate the green infrastructure that is there. Also, point 6.25 within this section, points to employment opportunities. As a resident, I can tell you that these opportunities are few and far between. If there is to be development it should be commercial, not housing. I can't help but notice the plan also suggests that SD4 be built next to the drainage for Polegate. Since the 2010 sewage incident, how will the addition of 700+ homes help? Has the Environment Agency given it's consent to this proposal? (PPS 25, point 26) PPG 17, point 17 - 17. Local authorities should: i. avoid any erosion of recreational function and maintain or enhance the character of open spaces; ii. ensure that open spaces do not suffer from increased overlooking, traffic flows or other encroachment; iii. protect and enhance those parts of the rights of way network that might benefit open space; and iv. consider the impact of any development on biodiversity and nature conservation. I do not think the proposed plan meets these recommendations. In the same document, annex: Definitions, point 3 reads: Local authorities should also recognise that most areas of open space can perform multiple functions. They should take account of the various functions of open space when applying the policies in this document. These include: i. strategic functions: defining and separating urban areas; The Hindslands site is a vital barrier between Eastbourne and Polegate, and should be maintained.

Details of Changes to be Made:
That SD4 be struck off as a site for consideration.

Paragraph 6.31

Details of Reasons for Soundness/Legal Compliance:
Refer this paragraph to the managing the release of housing section to add clarity and certainty to the CS. As requested split SD7 & SD6 on the phasing and be clear on the priority of the development of SD7 before SD6 due to proximity to Polegate and services and employment sustainabilties.

Details of Changes to be Made:
The CS offers no suitable guidance on the delivery of housing over the plan period for Stone Cross This should be address as stated above.
Details of Reasons for Soundess/ Legal Complaince:
I am writing to register my objection to the proposed residential development south east of Stone Cross. We have lived in Eastbourne for the past 17 years and Borrowdale Close is right on the border with Wealden. Since living here we have seen Wealden build at least 3 developments on Eastbourne's boundary. This is grossly unfair on the residents of Eastbourne. It take advantage of the places unacceptable pressure on the already stretched local infrastructure and services provided by Eastbourne. The position of this proposed site is at the rear of existing homes in Langney and would mean that access to it would have to be on existing small estate roads which could not cope with the increase in traffic. Enough is enough.

Details of Changes to be Made:

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Details of Reasons for Soundess/ Legal Complaince:
I would like to register my strong objection to the building of 700 new homes plus employment floorspace on this greenfield site. Polegate, Willingdon and Eastbourne are soon going to merge into one big, sprawling town. We cannot afford to lose any more of our precious green spaces. Most of all, the traffic on the Eastbourne road is already horrendous. It won't take much more.

Details of Changes to be Made:
Details of Reasons for Soundess/ Legal Complaince:

I understand that although a proposal to develop the Hindsland/ Mornings Mill area was rejected only a few years ago, another such plan is under consideration. Whilst the original deadline (28 March 2011) has passed, my local parish council officer advises me that the period for representations has now been extended. Would you therefore please register my disapproval to the plans to create a large development, which will add to the already rapid increase in the size of Eastbourne over the past thirty years. The rate of development in and around Eastbourne in that period seems to far exceed that of other neighbouring seaside towns (e.g. Hastings and Brighton). In my view one of the problems of planning in the local area is that Eastbourne and its surrounding villages are governed by separate authorities, when dual, all- encompassing approach is needed. Development inside or just outside the town can have great ramifications for those living either side of the town boundary. My reasons for opposing this proposal can be summarised as follows: Environmental The area provides a rare green lowland corridor in the otherwise unbroken development which threatens to swallow Polegate (in the same way as has happened to Stone Cross) into the Eastbourne conurbation. The area at risk includes old woodland which provides a home to much wildlife. Traffic Problems Secondly, the traffic on Eastbourne Road, Willingdon is already too heavy due to the peculiar geographical location of Eastbourne (hemmed in by the Downs) and the lack of approach roads. In high season the number of people in the town doubles, exacerbating the problem. Furthermore the lack of good roads linking Brighton, Crawley/ Gatwick and Greater London with Eastbourne and Hastings already causes unacceptable levels of traffic congestion and has hindered local economic growth. Encouraging more people to live in the Eastbourne conurbation which hosts a dwindling number of jobs will only cause more traffic problems. Local industrial development needs modern road networks to the east of the A23/ M23 road. Any attempt at boosting the local economics without providing a dual carriageway road from Lewes to Hastings, and on the A22 from Hailsham to Uckfield and beyond along the A272, will, I believe, be doomed to failure. Impact on local Services Lastly, whilst I believe good roads are the main pre-requisite for commercial or residential development, sufficient infrastructure provided by local services needs to be in place. Currently local health services are overstretched. Units at the Eastbourne District General hospital are under threat and Eastbourne charities are struggling to cope. Cuts in local Social Services are likely. If such housing developments are necessary, in my view they should be small scale and in areas nearer to good transport links and jobs. The East/ West Sussex border areas near Burgess Hill, Haywards Heath, Uckfield and East Grinstead at present offer more suitable locations for such developments. Only if there is a serious upgrading of the road network as mentioned above and considerable long term investment in the local social infrastructure, would a slight increase in housing and commercial property development in the Willingdon/ Polegate/ Stone Cross area possibly be justified.

Details of Changes to be Made:

<table>
<thead>
<tr>
<th>Sound</th>
<th>Yes</th>
<th>No</th>
<th>Justified</th>
<th>Effective</th>
<th>Consistent with national policy</th>
</tr>
</thead>
<tbody>
<tr>
<td>Legally Compliant</td>
<td>Yes</td>
<td>No</td>
<td></td>
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</tbody>
</table>
Details of Reasons for Soundess/ Legal Compliance:
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Details of Changes to be Made:
Paragraph 6.31

Details of Reasons for Soundness/ Legal Compliance:

The Core Strategy is sound and sets out a justified and effective land use strategy for the Polegate area which is consistent with national planning policy. Policy WCS4, Strategic Development Areas, lists as Location SD4 'Land at South Polegate and East Willingdon'. Chapter 6, paragraphs 6.21 to 6.32 and Figure 8 (pages 43-46) show a clear and suitable set of proposals. There is to be no development west of Polegate; housing is proposed to be located in an urban extension south of Polegate and east of Willingdon (Hindslands and Mornings Mill). Paragraph 6.27 of the Core Strategy states: A site was allocated in the 2005 Non Statutory Wealden Local Plan for an urban extension to the north west of Polegate, in the vicinity of Honey Farm. However, this proposal was dependent upon the provision of the Folkington Link and other community infrastructure to enable the integration of development into the town. No such infrastructure has been provided or is known to be planned. Since this allocation the South Downs has achieved National Park status and the adjacent Wootton Manor has formally been included in the English Heritage register of Historic Parks and Gardens. This site has been re-assessed as part of SHLAA and is no longer considered suitable for housing. Figure 8 shows that the land west of Polegate north of the railway line will stay as open countryside adjacent to the National Park. Paragraph 6.27 of the Core Strategy is strongly supported. The Hone Farm or West of Polegate (Pelham Homes) site was included in the Non-Statutory Local Plan in 2004 but that Plan was never subject to a public inquiry. Those affected by the Honey Farm site were not permitted in 2004-05 to oppose it by advancing a different location for the housing, as the opportunity to propose a different location was stated then to be given by the Local Development Framework process in 2005-07. That was delayed and this stage has only now been reached with this Core Strategy. The overwhelming arguments against the Honey Farm location have now been accepted by the District Council. These arguments are: The Honey Farm location would be in isolated development cut off by the A27 trunk road - the ‘Folkington Link’ no longer being in the trunk road programme; Foot and cycle access to the Honest Farm site would be permanently by footbridges and alleyways directly affecting residents in the Brookside Avenue area of Polegate; The Honey Farm location could not be integrated into the community of Polegate and would be a separate settlement; The setting of the South Downs National Park would be harmed; The setting of the adjacent historic property Wooton Manor, its park and garden would be damaged. The Core Strategy is justified in rejecting the Honey Farm location. The proposed housing location at Hindsland and Morning Mill is sound and justified. If that housing location does not prove to be the best site on further study, the preferred location for housing in the Polegate Town Council Masterplan should be chosen. This is the area north of Polegate and south of the A27 Bypass which is also considered suitable in the 2010 Strategic Housing Land Availability Assessment.

Details of Changes to be Made:

Yes Sound ☑ No Justified ☐ Effective ☐ Consistent with national policy
Legally Compliant ☐ Yes ☐ No
Details of Reasons for Soundness/ Legal Compliance:

We do not believe that the proposed core strategy has taken adequate consideration of the effects that the development of further housing to the south east of Stone Cross (SD6) would have upon the adjoining area within the Borough of Eastbourne and its residents. Development to the south of the railway line at Stone Cross would place an unacceptable strain upon the community infrastructure within North Langney. The existing residential developments within the District of Wealden but along the Borough boundary lack community facilities and so residents make use of facilities on the Eastbourne side of the border which Wealden District council does not contribute towards. Furthermore any proposed development south of the railway line will need to be accessed through the already overstretched and narrow estate roads in Langney.

Details of Changes to be Made:
The proposed development for housing at SD6 should not extend to the south east of Stone Cross. The land south of the railway line should be removed from the core strategy as housing land.
### Details of Representation 125

**Person ID**: 520446  
**Agent ID**: 520431  
**ID**: 125  
**Cllr**: Harris  
**Agent**: Tester  
**Langney Liberal Democrats**  
**Paragraph**: 6.31  
**Sound**: No  
**Legally Compliant**: Yes  

**Details of Reasons for Soundness/ Legal Compliance:**

We do not believe that the proposed core strategy has taken adequate consideration of the effects that the development of further housing to the south east of Stone Cross (SD6) would have upon the adjoining area within the Borough of Eastbourne and its residents. Development to the south of the railway line at Stone Cross would place an unacceptable strain upon the community infrastructure within North Langney. The existing residential developments within the District of Wealden but along the Borough boundary lack community facilities and so residents make use of facilities on the Eastbourne side of the border which Wealden District council does not contribute towards. Furthermore any proposed development south of the railway line will need to be accessed through the already overstretched and narrow estate roads in Langney.

**Details of Changes to be Made:**

The proposed development for housing at SD6 should not extend to the south east of Stone Cross. The land south of the railway line should be removed from the core strategy as housing land.

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### Details of Representation 126

**Person ID**: 520444  
**Agent ID**: 520431  
**ID**: 126  
**Cllr**: Miah  
**Agent**: Tester  
**Langney Liberal Democrats**  
**Paragraph**: 6.31  
**Sound**: Yes  
**Legally Compliant**: Yes  

**Details of Reasons for Soundness/ Legal Compliance:**

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**Details of Changes to be Made:**

The proposed development for housing at SD6 should not extend to the south east of Stone Cross. The land south of the railway line should be removed from the core strategy as housing land.
Details of Reasons for Soundness/ Legal Compliance:
The Core Strategy is sound and sets out a justified and effective land use strategy for the Polegate area which is consistent with national planning policy. Policy WCS4, Strategic Development Areas, lists as Location SD4 'Land at South Polegate and East Willingdon'. Chapter 6, paragraphs 6.21 to 6.32 and Figure 8 (pages 43-46) show a clear and suitable set of proposals. There is to be no development west of Polegate; housing is proposed to be located in an urban extension south of Polegate and east of Willingdon (Hindslands and Mornings Mill). Paragraph 6.27 of the Core Strategy states: A site was allocated in the 2005 Non Statutory Wealden Local Plan for an urban extension to the north west of Polegate, in the vicinity of Honey Farm. However, this proposal was dependent upon the provision of the Folkington Link and other community infrastructure to enable the integration of development into the town. No such infrastructure has been provided or is known to be planned. Since this allocation the South Downs has achieved National Park status and the adjacent Wootton Manor has formally been included in the English Heritage register of Historic Parks and Gardens. This site has been re-assessed as part of SHLAA and is no longer considered suitable for housing. Paragraph 6.27 of the Core Strategy is strongly supported. The overwhelming arguments against the Honey Farm location have now been accepted by the District Council. These arguments are: The Honey Farm location would be in isolated development cut off by the A27 trunk road - the 'Folkington Link' no longer being in the trunk road programme; Foot and cycle access to the Honest Farm site would be permanently by footbridges and alleyways directly affecting residents in the Brookside Avenue area of Polegate; The Honey Farm location could not be integrated into the community of Polegate and would be a separate settlement; The setting of the South Downs National Park would be harmed; The setting of the adjacent historic property Wooton Manor, its park and garden would be damaged. The Core Strategy is justified in rejecting the Honey Farm location. The proposed housing location at Hindsland and Morning Mill is sound and justified.

Details of Changes to be Made:
Details of Reasons for Soundness/ Legal Compliance:

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Details of Changes to be Made:
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Details of Changes to be Made:
Details of Reasons for Soundess/ Legal Complaince:

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Details of Changes to be Made:

The proposed building of 700 homes on land at Hindsland and Mornings Mill Farm, Willingdon is unsound because:- 1.The increasingly heavy use of traffic on A2270 causes problems at present at peak times. Vehicles exiting properties have limited opportunity to access road safely at these times. The extra traffic generated from proposed site would cause the A2270 to become gridlocked. The increased accident risks / risks of road rage has not been dealt with effectively in the core strategy. This road is used constantly for emergency services, particularly ambulances to and from the District General Hospital. This could cause life threatening delays. 2.The Green space, Hindsland & Mornings Mill Farm is an essential buffer against effects of climate change on wildlife. Free movement of species across this landscape would be disconnected causing further collapse of our essential eco system. Increased carbon dioxide produced by homes, people and traffic at site would cause even more pollution. The peaceful country footpath at present provides access to necessary public open space. This would be lost. Each problem will affect human health and well being. 3.Water management required for this site would be detrimental to ecological habitats. The water table in the area is very high. At present properties in vicinity suffer flooding of gardens at heavy rainfall. At times drains struggle to cope with overload. Building on Hindsland and Mornings Mill Farm will greatly exacerbate flooding risk to entire area. This has not been dealt with in the core strategy.

Details of Changes to be Made:
Remove the proposed provision of 700 dwellings etc on the land at Mornings Mill Farm & Hindsland, Willingdon.
Details of Reasons for Soundess/ Legal Complaince:

Paragraphs 6.21 - 6.30 of the document provide further information to support the Council's policy approach towards further development at Stone Cross and this is supported. Text at paragraph 6.31 identifies the potential split in housing delivery between the two strategic development areas of Stone Cross (SD6 and SD7) although it is noted that there is flexibility here subject to the local highway improvements required to accommodate the development. This flexibility within the overall strategy to deal with changing circumstances is welcomed and is considered to ensure the Core Strategy is effective in line with the requirements of paragraphs 4.44 and 4.46 of PPS12. Sites north of Rattle Road, east of Stone Cross within SD6 have been determined within the SHLAA to be deliverable housing sites. It is acknowledged that the development of these sites would have a limited impact on the landscape and that structural planning can mitigate any local impact as well as protect against potentially conflicting land uses. Between the two sites in the SHLAA east of Stone Cross, north of Rattle Road, the landowners are collaborating with regard to access and evidence of this will be forwarded to the District council in due course. Likewise, a Phase 1 Habitats Survey has been commissioned to support the general masterplan development of this location and again this will be forwarded to the Council following its completion to provide further evidence of the suitability of this location for development. As the Council will be aware, my client's land (The Oaks, Rattle Road - SLHAA ref: 415/3280) fronts directly onto Rattle Road, is in the control of one single landowner, can be brought forward for development at any time and to the best of our knowledge is free from any environmental constraint. In this respect, we consider its inclusion within the identified SD6 Strategic Development Area is sensible and reflects a sound approach that will contribute to ensuring the Core Strategy is deliverable, founded on a robust and credible evidence base and is the most appropriate strategy when considered against the reasonable alternatives. The Council has engaged with the community in its consultations on the Issues and Options Paper 2007 and the Spatial Development Options Consultation in 2009. The comments from these consultations, particularly with regard to the need for affordable housing, have been reflected in the emerging policies. We are also aware that the Council continues to engage with Parish Councils in the area, including Jevington and Westham Parish Councils, to help reflect their vision for the settlements and service provision. As a result I agree that the Core Strategy is generally sound (subject to my comments concerning Policy WCS1), and demonstrates effectiveness in the delivery of development in this part of the District. I therefore consider Strategic Development Area SD6 in the Proposed Submission Core Strategy to be 'sound' in terms of the tests in Planning Policy Statement 12. I consider it justified, based on credible and robust evidence and effective with regard to delivery and flexibility and is consistent with national policy.

Details of Changes to be Made:
Details of Reasons for Soundness/ Legal Compliance:

Separation of Polegate and Willingdon Para 2.2 states that 'each settlement has its own unique characteristics and functions, depending on its location and historical influences.' This wording follows on from the wording in Chapter 17 of the Non Statutory Wealden Local Plan. However the Development of the SD4 area could either force two settlements (Willingdon and Polgate) into one, thus destroying the unique characteristics referred to or result in a remote settlement in Willingdon if the important green frontage to the A2270 is to be preserved. The vital green gap on that side of the A2270 between the built up areas of Willindon and Polegate is likely to be lost. Para 7.23 states 'in order to maximize the benefits, policy places the emphasis on the creation and maintenance of linkages between green spaces.' Changing the Character of Willingdon Para 2.21 states 'the strategy is not seeking to change the character of Wealden.' It is argued that development of the SD4 area will either force two settlements (the village of Willingdon and the town of Polegate) into one thus changing the character of the area or alternatively a remote and separate settlement will be created. It could also lead to a change in the character of Willingdon with encouragement of extensive business use where none currently exists. Community facilities are proposed in an area sufficiently remote from most of the village to need transport to access it. Development of Recreational Land Planning Policy Guidance 17: Planning for open space, sport and recreation para 17.10 states 'existing open space, sports and recreational buildings and land should not be built on unless an assessment has been undertaken which has clearly shown the open space or the buildings and land to be surplus to requirements.' The Core Strategy refers frequently to the lack of suitable recreational facilities so even if an assessment had been carried out the land is not surplus, so the proposal to develop and existing on (Hindslands) (SD4) is inconsistent. Chapter 17 paragraphy 17.1 of the Wealden non statutory plan states that "Polegate and Willingdon are adjacent but distinctly different communities located at the foot of the South Downs to the north of Eastbourne." However, one outcome of the proposed Core Strategy is that the two settlements could merge for the first time on the east side of the A2270. Traffic Congestion Para 6.23 states "the A2270 running through the urban area is still heavily congested and traffic flows on the strategic road network are very high." Numerous references are made throughout the strategy to the need for infrastructure, and 5.16 states "development at SD4 will be phased to commence from 2019 to enable integration of development in relation to transport infrastructure requirements and interventions in South Wealden." The impact of this number of additional vehicles will have a very bad effect on the already heavily congested road network of the A2270 and surrounding roads in Lower Willingdon. With the very limited changes proposed to junctions the policy is unsound and needs further examination. It is not understood how a quality bus service would improve matters. These proposals were not properly examined by the District Council because it was only a tthe last moment that a decision was made to promote SD4 and the very late arrival of the SWETS document. Concerns about School Places Concern is expressed about whether adequate provision has been made for additional places at the primary and secondary schools in the local vicinity of SD4. Extensions to the existing school which are in heavily built up areas with heavy congestion on the roads is not the answer. The strategy appears to be unsound.

Details of Changes to be Made:
Details of Reasons for Soundness/ Legal Compliance:

Medical Infrastructure Threatened Para 6.22 refers to the 'limited range of facilities available locally', and states 'a new GP surgery and medical centre has recently been granted planning consent in Willingdon.' This is a change from the original draft wording that the centre would be built and there is now considerable doubt whether it will ever be built at this location. Given that uncertainty the provision of medical infrastructure cannot be sound.

Drainage Issues Para 6.28 states 'development will only be allowed it it can be accommodated by the existing works, unless an alternative location for the treatment and discharge of waste water is implemented.' There appears to be undue reliance on this infrastructure being provided and if it and other infrastructure is not provided the whole allocation at SD4 fails. There appears no fall back position should this be the case and that will make the whole core strategy unsound in terms of numbers of dwellings to be built.

Details of Changes to be Made:

Yes ☐ No ☐ Justified ☐ Effective ☐ Consistent with national policy
Legally Compliant ☐ Yes ☐ No

Details of Reasons for Soundess/ Legal Complaince:

I Object to the proposed development to build 220 new homes within an urban extension to the urban are of Stone Cross as we will lose valuable green open space.

Details of Changes to be Made:

Yes ☐ No ☐ Justified ☐ Effective ☐ Consistent with national policy
Legally Compliant ☐ Yes ☐ No

Details of Reasons for Soundess/ Legal Complaince:

I am writing in protest at the proposal to build seven hundred homes on the Hindsland/Morning Mill Farm site. It appears from the Wealden Housing survey of 2009 that only a small number of new houses are needed and these could be built throughout the Wealden area. Our areas of natural habitat and beauty are being eroded and these areas are beneficial for residents and wildlife alike. We do not have the infrastructure to support seven hundred houses, our roads are in appalling repair, our doctors are overworked and there are a shortage of school places. Another major factor is that the proposed area being built on acts as a flood plane for local housing and as we have seen in recent years our weather is unpredictable and the incidence of flooding is more frequent and devastating. Therefore I strongly oppose the proposal for the building of seven hundred new houses on the aforemention site.

Details of Changes to be Made:
Representation ID
706
Person ID Mr & Goldrick
108548
Agent ID
Paragraph 6.31
Sound ☐ Yes ☐ No ☐ Justified ☐ Effective ☐ Consistent with national policy
Legally Compliant ☐ Yes ☐ No
Details of Reasons for Soundess/ Legal Complaince:
Our first and most paramount concern over any development is the loss of countryside and of wildlife living there. Poor animals and birds do not have any choice in us humans constantly eating away at their living environments, which has already been eroded enormously. We have far fewer plant life and other forms of life due to developments such as the above, and if we carry on the way we are going, even more plants and creatures will become extinct to add to the ones that already have. We wrote, to not avail, with our objections over the 550 homes and an industrial estate being built between Ditton's Corner and the Polegate Bypass. Unfortunately, building has already started there. Hopefully this letter will make a difference. As well as the loss of plants and wildlife, these building schemes make a huge impact on the people who already live here. Roads are not going to be able to cope with the extra traffic created by any development. The A27 already can't cope with the heavy traffic it already has. Plus the fact, there's too few parking spaces, and the few that we have - like the Co-op Car park has already had houses built on that! Public transport is also a joke. Often there is only standing room on our squashed trains. Our buses are also extremely infrequent. Eastbourne District General Hospital is full to bursting and can't cope with any more patients. The same is true for doctor's surgeries and dentists, who are only taking on private patients now. Schools here are in the same situation. We have therefore made a decision not to support this development for the above reasons.

Details of Changes to be Made:

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Representation ID
724
Person ID Mr Brundle
103040
Agent ID
Paragraph 6.31
Sound ☐ Yes ☐ No ☐ Justified ☐ Effective ☐ Consistent with national policy
Legally Compliant ☐ Yes ☐ No
Details of Reasons for Soundess/ Legal Complaince:
I wish to comment regarding the above development plan involving land at Hindsland/Mornings Mill Farm. Flooding takes place during heavy rainfall. Should future development take place on the higher ground, this will result in further flooding in the Broad Road/Oldfield area. The proposed density of building will inevitably result in many more cars in the area. This will result in further car parking issues.

Details of Changes to be Made:
WJPC is concerned at the numerous references to Polegate and Willingdon as one settlement, as highlighted in 3.3 Table 1, 3.11, SPO6, WCS2, WCS3, 5.13, 6.31(2), Figure 8 and Figure 12. In particular, Figure 2 showing settlement hierarchy, places Polegate and Willingdon as one settlement, yet details other settlements individually.

Details of Changes to be Made:

Summary - use of greenfield site, currently poor infrastructure, coalescence, water supply, loss of wildlife habitats, drainage, agricultural land. No need to conform to the South Coast Plan.

Details of Changes to be Made:
### Details of Reasons for Soundness/ Legal Compliance:

Policy WSC4 identifies the Strategic Development Areas in the District that the Council considers to be critical to the delivery of the overall strategy. SD6 identifies land at East and South East of Stone Cross that includes land north of Rattle Road owned by my client. We support the approach adopted within Policy WCS4 and the importance attached to the identified Strategic Development Areas to deliver housing and employment opportunities and wider services and infrastructure to support the growth of the District. In particular we support the identification of SD6 - it being a logical location to accommodate strategic development given the status of Stone Cross as a Service Centre within the wider settlement hierarchy, its particularly good public transport connections to Langney and Estbourne, its existing level of services, employment opportunities and facilities and its close links with other A22/A27 primary and trunk routes. Indeed, the provision of housing and employment development in the area will, we believe, help to address the economic needs of the south of the District and the wider Sussex Coast sub-region whilst also delivering affordable housing in meaningful numbers and making a positive contribution to the sustainability of Stone Cross and the quality of life for existing and future residents. The South East Plan proposes that approximately 63% of Wealden's new housing development is located in the Sussex Coast Policy Area. The draft Core Strategy is in accordance with this as at present approximately 63% of new allocations (excluding rural areas) are within the Sussex Coast Policy Area. Overall therefore, this approach is consistent with policy within the South East Plan. including specific policy for the Sussex Coast Sub-Region and national planning policy (PPS3 paragraphs 36-38) by helping to create mixed and sustainable communities, developing housing and employment in suitable locations offering a range of community facilities with access to jobs and services. The approach also accords with the Government's housing objectives in PPS3 in particular the approach identified in Paragraphs 10 and 36 of delivering housing developments in suitable locations, which offer a good range of community facilities and with good access to jobs, key services and infrastructure. Further, it is apparent that all of the requirements set out in paragraph 38 of PPS3 for finding the most suitable locations for growth have been carefully applied to the housing and employment land targets, resulting, at least in the south Wealden District area, in a comprehensive, credible and deliverable spatial plan to address the needs of the District. The Council's SHLAA identified a number of development sites around Stone Cross that are suitable for development and unconstrained by ownership. In addition, development in this location is known to be viable based on the findings of the Strategic Housing Market Assessment. Having regard to all of the above points and when considered against the alternative of less or no development, this approach is considered to be sound. Less or no development at Stone Cross would be at odds with the established national and regional planning policy identified above. It would also fail to reflect the established settlement pattern in the District, would place greater development pressures on other locations in the District and would inevitably fail to achieve the aims of sustaining and enhancing local services, providing homes in parallel with jobs, providing affordable housing and combining growth with recreation and leisure development. Overall therefore, the approach to development within this area is largely justified in line with the requirements of PPS12 as it is founded on a robust and credible evidence base and is the most appropriate strategy when considered against the reasonable alternatives. However, in the context of our comments concerning the overall scale of housing required in the District under Policy WCS1, we consider that the housing provision identified for Stone Cross under supporting text (Figure 5 and at paragraph 6.31) to Policy WCS1 (650 dwellings) should be increased to reflect existing local housing need and the anticipated growth in households during the Core Strategy period.

### Details of Changes to be Made:

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<th>Sound</th>
<th>Yes</th>
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</table>
I write to register my objections to the Polegate and Willingdon and Stone Cross area strategy in the above document on the basis that it is not sound or justified for the following reasons: NUMBER OF ALLOCATED HOUSING CONTRADICTS THE AMOUNT WHICH IS CLAIMED TO EVEN BE SUSTAINABLE. It is very disappointing that despite repeatedly asked questions at Wealden District Council’s full council meetings and committees regarding the proposed 1265 new houses for this area, Wealden District Council’s position is that it is waiting for the outcome of the Honey Farm Appeal where the proposal is for up to 520 houses. So far, there has never been any mention of any alternative plans should the Council lose the appeal. The Council appears to be confident in defending this appeal, despite also contradicting itself with by using the exact same reasons in the rejection of Honey Farm at Committee to justify and support those proposals within the Core Strategy for the Polegate and Willingdon area, for a site which is only down the road where the same problems would apply. Wealden District Council clearly has no plan B and if Wealden District Council cannot successfully defend this appeal, Willingdon and Polegate will automatically be lumbered with 1785 extra houses. For this reason alone, the Proposed Submission Document is irresponsible and misleading the communities. In addition reason as below;

INFRASTRUCTURE - SCHOOL AND HEALTH FACILITIES As it stands, the local Schools and health facilities are only just able to cope with the high level of service users in the Eastbourne area. An estimated increase in the local population by at least 2,000 – 3,200 people will see a severe strain on the local resources available within the infrastructure. Willingdon Community School is already oversubscribed and as an example, mobile classrooms were introduced some years ago to accommodate the increase in students. To propose a further extension at Willingdon Community School to take on more students will see a further strain on the infrastructure, the impact of the surrounding roads and parking will be severely impacted. The need of a new community school and primary school has not been fully considered and no site has been identified within the plans. The proposed new medical center at the former Towermill Place remains very uncertain, this council had amended the wording at the end, it is misleading that the new medical center is part of the Infrastructure when the funding is so uncertain. This was not mentioned many times and our group has submitted that it would simply be unworkable. Currently there is heavy traffic congestion along the A2270 at peak times, with the extra traffic joining A2270 created from the proposed Morning Mills site, it would be impossible for the bus to move from A to B. The Council should be aware that the travel plans are unfeasible, despite this, this Council is still adamant that the Morning Mills site is suitable. For example, in the Pevensey Road area, North Polegate, there are about 640 dwellings. A few months ago, Stagecoach had considered withdrawing the main bus service for this area. It is very difficult to believe that the proposal of 700 dwellings will actually sustain the service and the bus service will actually remain in place. The local roads and traffic infrastructure is already running at it’s maximum capacity at present. During peak commuting hours, traffic is often congested along the A2270 at peak times, with the extra traffic joining A2270 created from the proposed Morning Mills site, it would be impossible for the bus to move from A to B. The Council should be aware that the bus companies contend that there are not enough service users in the area which make bus companies contend that there are not enough service users in the area which make

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Sound ☐ Yes ☑ No ☐ Justified ☐ Effective ☐ Consistent with national policy

Legally Compliant ☐ Yes ☐ No

Details of Reasons for Soundess/ Legal Complaince:

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currently at peak times, there are long queues from Cophall roundabout back to Lower Willingdon and C40 Wannock Road. Within the honey Farm appeal, this Council argues that it would be difficult for vehicle users to enter the Cophall roundabout and make their journeys to the A27 to get to Lewes or Hailsham and other areas. The Council also contends that the infrastructure would not be able to cope with the number of dwellings at the site, despite this argument raised by the Council, those same arguments also apply to the Mornings Mill Farm site, which this Council has failed to consider. PROPOSED SUBMISSION CORE STRATEGY OPTION CONSULTATION 2007 Again, in 2007, 749 Polegate and Willingdon residents submitted their consultation slips to Wealden District Council and the majority of their views was that Hindsland should not be developed and should remain as a green area and recreational ground. However, Wealden District Council and other groups within the council decided not to accept their consultation slips and their views. At the same time, Wealden District Council received about 1,100 from the whole district. Therefore the 749 submissions from Polegate and Willingdon residents were ignored, as result this seems to have controlled the outcome. Most members of this Council opposed the Honey Farm proposal, their reasons are almost the same as the reasons we have submitted that apply to Hindsland / Mornings Mill Farm. WATER AND SEWAGE On many occasions, our group has submitted that the water supply and sewage is at their full capacity. During meetings at Wealden District Council, we have been told that the sewage has the capacity for the maximum of 1000 new houses. The proposed house numbers are well over the limit of its full capacity. Again these essential facilities continue remain outstanding and the issues ignored GREEN SPACE It is important that Hindsland / Mornings Mill Farm continue to remain as a green lung between Polegate and Willingdon, according to the local plan. Currently Polegate Town and Willingdon & Jevington Parish Council are short of amenity and recreation space, the shortage is between 30 - 40% below of the national average. In the Proposed Submission Core Strategy Document there is nothing to address this issue. I trust that the above representations will be placed on record accordingly.

**Details of Changes to be Made:**
1.1 These representations have been prepared on behalf of the Trustees of the KKH Banner Life Interest Settlement which own land immediately to the north and east of the built up area of Stone Cross. This land has been identified as part of two urban extensions to Stone Cross in the Core Strategy. the land is referred to below as Site 1 which is Land north of Peelings Lane and adjoining Pickens Wood and Site 2 Land to the south of Peelings Lane further to the east. These sites are illustrated in Appendix 1. 1.2. We support the allocation of 650 dwellings in Stone Cross, Stone Cross is a settlement which is well connected to Eastbourne to the south, the urban area of Eastbourne stretches north to Stone Cross without a break. 1.3. Due to its services and transport connection as well as its proximity to neighbouring settlements we consider that Stone Cross is a sustainable location for development. Planning Policy Statement 1 (PPS1) includes in paragraph 3 a definition of sustainable development which is "development which meets the needs of the present without compromising the ability of future generations to meet their own needs,. "Paragraph 6 of PPS1 states that "planning has a key role in the creation of sustainable communities: communities that will stand the test of time, where people want to live, and which will enable people to meet their aspirations and potential. 1.4 Stone Cross has, as set out in paragraph 6.21 of the Core Strategy, "grown rapidly in recent years as a result of being identified for development in previous Wealden Local Plans". Figure 13 of the Wealden Local Plan illustrates the locations that were identified for development in Stone Cross; a copy of this plan is shown in Appendix 1. 1.5 Planning Policy Statement 3 (PPS3) states in paragraph 36, that housing should be developed in suitable locations which offer a range of community facilities, and good access to jobs, key services and infrastructure. Paragraph 38 sets out the criteria for identifying broad locations and specific sites in Local Development Documents. These criteria include evidence of current and future levels of demand for housing as well as the availability of viable sites. Weight must be given to sites with good public transport connections that will contribute to cutting carbon emissions. Account must be taken of "any physical, environmental, land ownership, land-use, investment constraints or risks associated with broad locations or specific sites, such as physical access restrictions, contamination, stability, flood risk, the need to protect natural resources e.g. water and biodiversity and complex land ownership. 1.6 Stone Cross is some 4 km north of Eastbourne, It is immediately to the north of Langley, some two km east of Polegate which has a railway station and two km west of Westham which also has a railway station. Stone Cross has good bus services particularly to Eastbourne with buses departing three to four times per hour during the day, Monday to Saturday. Bus number 56 departs for Eastbourne from Stone Cross 9 times a day between 07.55 and 16.54 as well as Eastbourne from Stone Cross twice per hour from 07.00 to 18.00 and also links Stone Cross to Hailsham. The number 55 departs 10 times from Eastbourne to Stone Cross between 08.00 and 17.40 and also links Stone Cross to Westham. 1.7 Stone Cross also has a good range of facilities. Convenience shopping is provided by a supermarket in the centre of the settlement. Stone Cross has useful range of health facilities with a doctors, dentists, and pharmacy. In addition there is a vets practice, takeaway, public house church and a community hall. Stone Cross also has a primary school with a nursery which can if necessary be expanded to provide space for children from the new development allocated to the settlement. A secondary school is available less than a kilometre to the south of Stone Cross in Langley. the Core Strategy recognises that Stone Cross is well placed to use the facilities in Langley, and can help to facilitate regeneration in Langley. 1.8 We therefore support the view of the Council set out in the Core Strategy that Stone Cross is a sustainable location for development. 1.9 PPS3 states that Local Planning Authorities should provide specific deliverable sites to deliver housing in the first fives of the plan. To be deliverable sites should be available for development suitable for development and development should be achievable. 1.10. Site 1 forms part of SD7 as shown in Fugure 8 Polegate and Willingdon and Stone Cross Area Strategy and is a deliverable residential site. It is some 3.7 hectares in size and comprises agricultural land and woodland. The sites western boundary is formed by the B2104 Hailsham Road and housing development that runs along this road. To the south west of the site is St Lukes Church which forms a land mark at the junction of the B2104 and dittons Road. 1.11 The site is in a single ownership the owners being the Trustees of the KKH Banner Life Interest Settlement. The simplicity of having one owner will aid delivery. The Trustees have been promoting the land for development since 2000. The SHLAA is therefore not correct to state that the land is in multiple ownerships. There are no legal constraints to delivering the land for development. The woodland forming part of the site and surrounding it would not be
developed. The agricultural land is free from constraints to development. 1.12 The site has good road frontage to the B2104 and is within walking distance (300 metres) of the main facilities in Stone Cross including the primary school and shops. The length of the road frontage will ensure there is sufficient space to create a suitable vehicular access to the site. 1.13 In long views from the west development on the site would be seen in the context of the existing development of Stone Cross and the settlement of Polegate, so the development would not have an adverse visual impact. In close views from the B2104 the development will be seen in the context of existing development on the opposite side of the B2104. 1.14 Though plans show that the site adjoins the A17 to the north this boundary comprises a thick and mature tree belt. This provides very good visual screening of the A27 and helps to mitigate noise from the road. If necessary further noise mitigation could be employed on the site to ensure good quality of life of those that would live on the site. Access can easily be provided from the site to Peelings lane for cyclists and pedestrians. 1.15 The trees already around the site will provide it with character and the master planning of the site can respond to the belts of trees and woods and the links provided by Peelings Lane in the layout of the development to create an attractive residential environment. 1.16 We therefore consider that Site 1 is deliverable as it is available for development now, is suitable for housing development and this can be achieved in five years without the need for third party land. 1.17 Site 2 forms part of SD6 in the Core Strategy and is some 4.25 hectares in size. It has Peelings lane to the north and is surrounded by belts of mature planting except for part of its southern boundary. Through its western boundary housing which is part of the 1998 Local Plan allocation built out in Stone Cross is visible. this gives the site a visual connection to the existing built up area. The A27 north of the site is well screened by trees and is in a cutting which will mitigate traffic noise. As with Site 1 there is space to include additional noise mitigation if required. there are views into the site from the east however, any development on the site will be seen in the context of the existing development of Stone Cross and development to the south on the B2247 Dittons Road. 1.18 Site 2 does not have direct road frontage. In the core Strategy it is proposed that SD6 would stretch to the north and south of the B2247 and the Polegate to Westham railway. The site is owned by the Trustees of the KKH Banner Life Interest Settlement who have been promoting it for development since 2000. The site is available and suitable for development however, the need to involve third party landowners to gain access to the site means that thought it is available and suitable for development, whether this development is achievable in five years is dependent on the phasing that the Council considers appropriate for SD6. It can therefore be argued that the site is developable in accordance with the PPS3 paragraph 56 definition. 1.19 The Core Strategy identifies that the risks to delivery of housing in the south of the District are the highways infrastructure required to mitigate impact on strategic routes and local junctions. Developing on sites 1 and 2 at Stone Cross with their good links to Langney and Eastbourne will be mean less traffic being put on strategic routes than by developing in other areas in the south of the District. This analysis is confirmed by paragraph 8.33 of the Council's Delivery of Housing Background Paper dated February 2011. Development in Polegate, Stone Cross and Willingdon is constrained by the capacity for waste water disposal which currently allows for a further 1,500 dwellings. However the Core Strategy only proposes to deliver 1,350 homes in this area to allow for windfalls so capacity does exist to deliver the development proposed. If new school or nursery places are required then the development around Stone Cross can fund extensions to the existing primary school and a new nursery if necessary.
INFRASTRUCTURE The local roads and traffic infrastructure is already running to its maximum capacity at present. During peak commuting hours, traffic is often congested along the A2270 Eastbourne Road, from as far as Willingdon roundabout to Cophall roundabout, Polegate High Street and C40 Wannock Road and Hailsham Road. Any increase in the number of vehicle movements from the proposed Morning Mills Farm needs to address this issue with a workable plan. As yet, Wealden District Council has not been confirmed how the highways issue will be addressed and how the traffic will work to accommodate the current high volume of traffic movements and with the extra proposed 700 new allocations (dwellings) and 8600 square metres of employment floor space on land at Hindsland / Morning Mill Farm would create. The South Wealden and Eastbourne Transport Study (SWETS) report had used difference format on the same Trip Rates & Trip Generations, it makes it very hard for the general public to understand exactly what the Trip Rates & Trip Generations are. However, Wealden District Council in the Honey Farm Appeal submissions, indicated that the traffic and road INFRASTRUCTURE can not accommodate the estimated traffic generated from the 520 houses, as there is only about 50 meters from Cophall roundabout. I would question how 50% more houses and 8600 square metres of employment floor space would be able to cope in the same road. Using the formula, the Trip Generation would be 450 both ways which equates to approximately 38 vehicle movements every 5 minutes. This Council has not been able to answer my question fully and has simply said that would be the Highways Authority's responsibility. I refer to pages 69 and 70 of the East Sussex County Council Highways' Report dated 10 September 2010 for information of their findings, which is relevant to my area and recreational ground. However, Wealden District Council and other groups within the council decided not to increase the number of vehicle movements from the proposed Morning Mills Farm needs to address this issue with a workable plan. As yet, Wealden District Council has not been confirmed how the highways issue will be addressed and how the traffic will work to accommodate the current high volume of traffic movements and with the extra proposed 700 new allocations (dwellings) and 8600 square metres of employment floor space on land at Hindsland / Morning Mill Farm would create. The South Wealden and Eastbourne Transport Study (SWETS) report had used difference format on the same Trip Rates & Trip Generations, it makes it very hard for the general public to understand exactly what the Trip Rates & Trip Generations are. 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COPHALL ROUNDBOARD SENSITIVITY TEST 3.1 Using the Dittons Road trip rates, the development traffic from 520 dwellings on the PW1 site has been calculated as follows: Table 3.1: 520 Dwellings Trip Rates & Trip Generations Time Period Trip Rates Trip Generations AM Peak Arrive Depart Two way Arrive Depart Two way (0800 - 0900) 0.12 0.46 0.58 62 239 301 The data shows an increase of about 301 trips per hour, 5.016 cars per minute, will affect other junctions seriously and create a bottleneck at A22/A27 and the Polegate cross roads, currently at peak times, there are long queues from Cophall roundabout back to Lower Willingdon and C40 Wannock Road. Within the honey Farm appeal, this Council argues that it would be difficult for vehicle users to enter the Cophall roundabout and make their journeys to the A27 to get to Lewes or Hailsham and other areas. The Council also contends that the infrastructure would not be able to cope with the number of dwellings at the site, despite this argument raised by the Council, those same arguments also apply to the Mornings Mill Farm site, which this Council has failed to consider. INFRASTRUCTURE- SCHOOL AND HEALTH FACILITIES As it stands, the local Schools and health facilities are only just able to cope with the high level of service users in the Eastbourne area. An estimated increase in the local population by at least 2,000 – 3,200 people will see a severe strain on the local resources available within the infrastructure. Willingdon Community School is already oversubscribed and as an example, mobile classrooms were introduced some years ago to accommodate the increase in students. To propose a further extension at Willingdon Community School to take on more students will see a further strain on the infrastructure, the impact of the surrounding roads and parking will be severely impacted. The need of a new community school and primary school has not been fully considered and no site has been identified within the plans. The proposed new medical center at the former Towermill Place remains very uncertain, this council had amended the wording at the end, it is misleading that the new medical center is part of the Infrastructure when the funding is so uncertain, this was not revealed until I questioned this at a cabinet meeting. PUBLIC TRANSPORT In the Core Strategy - Proposed Submission Document and at Wealden District Council meetings, the bus corridor has been mentioned many times and our group has submitted that it would simply be unworkable. Currently there is heavy traffic congestion along the A2270 at peak times, with the extra traffic joining A2270 created from the proposed Morning Mills site, it would be impossible for the bus to move from a to B. The Council should be aware that the bus companies contend that there are not enough service users in the area which has resulted in a number of cuts in the bus services within recent years. There is no doubt the choice of public transport is very limited which makes the travel plans unfeasible, despite this, this Council is still adamant that the Morning Mills site is suitable For example, in the Pevensey Road area, North Polegate, there are about 640 dwellings. A few months ago, Stagecoach had considered withdrawing the main bus service for this area. It is very difficult to believe that the proposal of 700 dwellings will actually sustain the service and the bus service will actually remain in place. PROPOSED SUBMISSION CORE STRATEGY OPTION CONSULTATION 2007 Again, in 2007, 749 Polegate and Willingdon residents submitted their consultation slips to Wealden District Council and the majority of their views was that Hindslands should not be developed and should remain as a green area and recreational ground. However, Wealden District Council and other groups within the council decided not
to accept their consultation slips and their views. At the same time, Wealden District Council received about 1,100 from the whole district. Therefore the 749 submissions from Polegate and Willingdon residents were ignored, as result this seems to have controlled the outcome. Most members of this Council opposed the Honey Farm proposal, their reasons are almost the same as the reasons we have submitted that apply to Hindsland / Mornings Mill Farm. In addition, in the Wealden non-statutory local plan consultation in 2003, we presented a petition signed by 1000 Willingdon households to Wealden District Council. Hindsland / Mornings Mill Farm is not suitable to build extra 1000 new homes. I am pleased to say that the Council and Councillors had made a very sensible decision at the time, 8 years on, there are no changes or improvements within the infrastructure. We are continually facing shortage of secondary school places, primary school places, nursery places and facilities including sports and play facilities, amenity space, parking places an indoor sports hall and swimming pool and yet this Council considers that these will be provided, how? There is no mention of any sustainable or plausible proposal. GREEN SPACE It is important that Hindsland / Mornings Mill Farm continue to remain as a green site between Polegate and Willingdon, according to the local plan. Currently Polegate Town and Willingdon & Jevington Parish Council are short of amenity and recreation space, the shortage is between 30 - 40% below of the national average. In the Proposed Submission Core Strategy Document there is nothing to address this issue. WATER AND SEWAGE On many occasions, our group has submitted that the water supply and sewage is at their full capacity. During meetings at Wealden District Council, we have been told that the sewage has the capacity for the maximum of 1000 new houses. The proposed house numbers are well over the limit of its full capacity. Again these essential facilities continue remain outstanding and the issues ignored

Details of Changes to be Made:

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NUMBER OF ALLOCATED HOUSING CONTRADICTS THE AMOUNT WHICH IS CLAIMED TO EVEN BE SUSTAINABLE. It is very disappointing that despite repeatedly asked questions at Wealden District Council’s full council meetings and committees regarding the proposed 1265 new houses for this area, Wealden District Council’s position is that it is waiting for the outcome of the Honey Farm Appeal where the proposal is for up to 520 houses. So far, there has never been any mention of any alternative plans should the Council lose the appeal. The Council appears to be confident in defending this appeal, despite also contradicting itself with by using the exact same reasons in the rejection of Honey Farm at Committee to justify and support those proposals within the Core Strategy for the Polegate and Willingdon area, for a site which is only down the road where the same problems would apply. Wealden District Council clearly has no plan B and if Wealden District Council cannot successfully defend this appeal, Willingdon and Polegate will automatic be lumbered with 1785 extra houses. For this reason alone, the Proposed Submission Document is irresponsible and misleading the communities. In addition reason as below; INFRASTRUCTURE- SCHOOL AND HEALTH FACILITIES As it stands, the local Schools and health facilities are only just able to cope with the high level of service users in the Eastbourne area. An estimated increase in the local population by at least 2,000 – 3,200 people will see a severe strain on the local resources available within the infrastructure. Willingdon Community School is already oversubscribed and as an example, mobile classrooms were introduced some years ago to accommodate the increase in students. To propose a further extension at Willingdon Community School to take on more students will see a further strain on the infrastructure, the impact of the surrounded roads and parking will be severely impacted. The need of a new community school and primary school has not been fully considered and no site has been identified within the plans. The proposed new medical center at the former Towermill Place remains very uncertain, this council had amended the wording at the end, it is misleading that the new medical center is part of the Infrastructure when the funding is so uncertain. This was not revealed until Councillor Stephen Shing questioned this at a cabinet meeting. PUBLIC TRANSPORT In the Core Strategy - Proposed Submission Document and at Wealden District Council meetings, the bus corridor has been mentioned many times and our group has submitted that it would simply be unworkable. 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The increase of about 301 trips per hour, 5,016 cars per minute, will affect other junctions seriously and create a bottleneck at A22/A27 and the Polegate cross roads, currently at peak times, there are long queues from Cophall roundabout back to Lower Willingdon and C40 Wannock Road. Within the honey Farm appeal, this Council argues that it would be difficult for vehicle users to
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Details of Changes to be Made:
I write to register my objections to the Polegate and Willingdon and Stone Cross area strategy in the Core Strategy on the basis that it is not sound nor justified for the following reasons:

INFRASTRUCTURE - SCHOOL AND HEALTH FACILITIES

As it stands, the local Schools and health facilities are only just able to cope with the high level of service users in the Eastbourne area. An estimated increase in the local population by at least 2,000 – 3,200 people will see a severe strain on the local resources available within the infrastructure. Willingdon Community School is already oversubscribed and as an example, mobile classrooms were introduced some years ago to accommodate the increase in students. To propose a further extension at Willingdon Community School to take on more students will see a further strain on the infrastructure, the impact of the surrounding roads and parking will be severely impacted. The need of a new community school and primary school has not been fully considered and no site has been identified within the plans. The proposed new medical center at the former Towermill Place remains very uncertain, this Council has amended the wording at the end, it is misleading that the new medical center is part of the Infrastructure when the funding is so uncertain. This was not revealed until Cllr Stephen Shing questioned this at a cabinet meeting.

PUBLIC TRANSPORT

In the Core Strategy - Proposed Submission Document and at Wealden District Council meetings, the bus corridor has been mentioned many times and our group has submitted that it would simply be unworkable. Currently there is heavy traffic congestion along the A2270 at peak times, with the extra traffic joining A2270 created from the proposed Morning Mills site, it would be impossible for the bus to move from A to B. The Council should be aware that the bus companies contend that there are not enough service users in the area which has resulted in a number of cuts in the bus services within recent years. There is no doubt the choice of public transport is very limited which makes the travel plans unfeasible, despite this, this Council is still adamant that the Morning Mills site is suitable. For example, in the Pevensey Road area, North Polegate, there are about 640 dwellings. A few months ago, Stagecoach had considered withdrawing the main bus service for this area. It is very difficult to believe that the proposal of 700 dwellings will actually sustain the service and the bus service will actually remain in place. The local roads and traffic infrastructure is already running to it’s maximum capacity at present. During peak commuting hours, traffic is often congested along the A2270 Eastbourne Road, from as far as Willingdon roundabout to Cophall roundabout, Polegate High Street and C40 Wannock Road and Hailsham Road. Any increase in the number of vehicle movements from the proposed Morning Mills Farm needs to address this issue with a workable plan. As yet, Wealden District Council has not been confirm how the highways issue will be addressed and how the traffic will work to accommodate the current high volume of traffic movements and with the extra proposed 700 new allocations (dwellings) and 8600 square metres of employment floor space on land at Hindsland / Morning Mill Farm would create. The report had used difference format on the same Trip Rates & Trip Generations, it make it very hard for the general public to understand exactly what the Trip Rates & Trip Generations are. However, Wealden District Council in the Honey Farm Appeal submissions, indicated that the traffic and road infrastructure can not accommodate the estimated traffic generated from the 520 houses, as there is only about 50 meters from Cophall roundabout. I would question how 50% more houses and 8600 square metres of employment floor space would be able to cope in the same road. Using the formula, the Trip Generation would be 450 both ways which equates to approximately 38 vehicle movements every 5 minutes. This Council has not been able to answer my question fully and has simply said that would be the Highways Authority’s responsibility. The report does not even address how this traffic problem will be address at present or in the future. The increase of about 301 trips per hour, 5,016 cars per minute, will affect other junctions seriously and create a bottleneck at A22/A27 and the Polegate cross roads, currently at peak times, there are long queues from Cophall roundabout back to Lower Willingdon and C40 Wannock Road. Within the honey Farm appeal, this Council argues that it would be difficult for vehicle users to enter the Cophall roundabout and make their journeys to the A27 to get to Lewes or Hailsham and other areas. The Council also contends that the infrastructure would not be able to cope with the number of dwellings at the site, despite this argument raised by the Council, those same arguments also apply to the Mornings Mill Farm site, which this Council has failed to consider. PROPOSED SUBMISSION CORE STRATEGY OPTION CONSULTATION 2007 Again, in 2007, 749 Polegate and Willingdon residents submitted their consultation slips to Wealden District Council and the majority of their views was that Hindslands should not be developed and should remain as a green area and recreational ground. However, Wealden District Council and other groups within the council decided not to accept their consultation slips and their views. At the same time, Wealden District Council received about 1,100 from the whole district. Therefore the 749 submissions from Polegate and Willingdon residents were ignored, as result this seems to have controlled the outcome. Most
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Details of Changes to be Made:

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Details of Reasons for Soundess/ Legal Complaince:

The section fails to properly assess the suitability of Stone Cross as a settlement to accommodate future growth whilst recognising the significant development that has occurred in this modest settlement in the last 15 years of the twentieth century. The amalgamation of Stone Cross with Polegate/Willingdon is a disingenuous attempt to improve the credentials of Stone Cross and deflect from the fact that it should not be designated a Service Centre rather a Local Service Centre or Neighbourhood Centre. However the amalgamation of these settlements will be a consequence of the strategy if pursued thus leading to an erosion of local identity and a further erosion of the pattern and character of settlements within the district (see key diagram and the amalgamation of settlement if SD5, SD7 and SD6 go ahead leading to a linear continuance settlement along the A27 as the gaps between Polegate, Stone Cross and Westham are closed) contrary to the stated aims of the Core Strategy (see for example 2.4, 2.7, 2.21 and 3.4)

Details of Changes to be Made:

Delete reference to Stone Cross and deal with Polegate and Willingdon, remove urban extensions to Stone Cross or significantly amend to reduce the scale of provision at Stone Cross commensurate and proportionate to the settlement size (estimated 3000-4000). replace part of the Stone Cross northern urban extension with a more sustainable extension to the south of Hailsham (300 - 350 homes); which would also be served by the South Hailsham Water Treatment Plant and thus would not introduce any new infrastructure issues beyond those of Stone Cross allocations.
The Core Strategy is sound and sets out a justified and effective land use strategy for the Polegate area which is consistent with national planning policy. Policy WCS4, Strategic Development Areas, lists as Location SD4 'Land at South Polegate and East Willingdon'. Chapter 6, paragraphs 6.21 to 6.32 and Figure 8 (pages 43-46) show a clear and suitable set of proposals. There is to be no development west of Polegate; housing is proposed to be located in an urban extension south of Polegate and east of Willingdon (Hindslands and Mornings Mill). Paragraph 6.27 of the Core Strategy states: A site was allocated in the 2005 Non Statutory Wealden Local Plan for an urban extension to the north west of Polegate in the vicinity of Honey Farm. However, this proposal was dependent upon the provision of the Folkington Link and other community infrastructure to enable the integration of development into the town. No such infrastructure has been provided or is known to be planned. Since this allocation for South Downs has achieved National Park status and the adjacent Wootton Manor has formally been included in the English Heritage Register of Historic Parks and Gardens. This site has been re-assessed as part of SHLAA and is no longer considered suitable for housing. Paragraph 6.27 of the Core Strategy is strongly supported. The overwhelming arguments against the Honey Farm Location have now been accepted by the District Council. These arguments are: 1. The Honey Farm location would be an isolated development cut off by the A27 trunk road - the 'Folkington Link' no longer being in the trunk road programme. 2. Foot and cycle access to the Honey Farm site would be permanently by footbridges and alleyways directly affecting residents in the Brookside Avenue area of Polegate. 3. The Honey Farm location could not be integrated into the community of Polegate and would be a separate settlement. 4. The setting of the South Downs National Park would be harmed. 5. The setting of the adjacent historic property Wootton Manor, its park and garden would be damaged. The Core Strategy is justified in rejecting the Honey Farm location. The proposed housing location at Hindslands and Mornings Mill is sound and justified.

Details of Changes to be Made:

Yes  Sound  Yes
No  Justified  No
Effective  Consistent with national policy
Legally Compliant  Yes  No

Details of Reasons for Soundness/ Legal Complaince:

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Details of Changes to be Made:
The SWETS Report indicates that the north of Polegate location does not need additional transport infrastructure, consistent with national policy. However, the broad location south of Polegate / east of Willingdon was included and assessed in detail. The Polegate Bypass was opened in 2002. The Polegate Bypass has changed the landscape character of the land south of the bypass. Mounding and planting have created an enclosed area which is not easily visible from the surrounding countryside. The landscape impact of the north of Polegate location would be less than that of the south of Polegate / east of Willingdon alternative. It would be out of view of the South Downs; whereas the south of Polegate / east of Willingdon location would be highly visible from the public-owned and accessible Coombe Hill. The impact on the views from and setting of the National Park would be negligible; the impact of the south of Polegate / east of Willingdon location on these views and settings would be large. The south of Polegate locations has not been subject to a landscape appraisal since the A27 Polegate Bypass was opened in 2002. The Polegate Bypass has changed the landscape character of the land south of the bypass. Mounding and planting have created an enclosed area which is not easily visible from the surrounding countryside.

Details of Changes to be Made:

17. The Draft Proposed Submission Core Strategy Policy WCS4 (p40) lists location SD4 as 'Land at Polegate/Willingdon'. This is the wording that should be restored to the text of the Core Strategy to make it sound.
18. Figure 8 should be amended to delete the broad location notation (red colour) at the south of Polegate / east of Willingdon location; the notation in the October 2010 draft Core Strategy Fig 8 should be restored to indicate that both north of Polegate and south of Polegate / east of Willingdon locations are potential strategic housing locations.

**Representation ID**
1109

**Person ID**  Mr Watkins
**Agent ID**  Kitewood estates

**Paragraph**  6.31

**Sound**  No  Yes
**Legally Compliant**  No  Yes

**Details of Reasons for Soundess/ Legal Complaince:**
The development boundary shown on Figure 8 to which this paragraph relates does not include land allocated in the Non Statutory Plan on land which has obtained Planning Consent north of Dittons Road.

**Details of Changes to be Made:**
Amend Figure 8 as shown attached.

**Representation ID**
1101

**Person ID**  Mrs Vine
**Agent ID**  Long Man Parish Council

**Paragraph**  6.31

**Sound**  Yes  No
**Legally Compliant**  No  Yes

**Details of Reasons for Soundess/ Legal Complaince:**
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**Details of Changes to be Made:**
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Details of Changes to be Made:
Paragraph 6.31

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Details of Changes to be Made:

Yes
Sound
Yes
No
Justified
No
Effective
Consistent with national policy
Legally Compliant
Yes
No

Yes
Sound

Yes
No
Justified
No
Effective
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Legally Compliant
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Details of Changes to be Made:

Sound: Yes, No, Justified, Effective, Consistent with national policy

Legally Compliant: Yes, No
Details of Reasons for Soundess/ Legal Complaince:
The Core Strategy is sound and sets out a justified and effective land use strategy for the Polegate area which is consistent with national planning policy. Policy WCS4, Strategic Development Areas, lists as Location SD4 'Land at South Polegate and East Willingdon'. Chapter 6, paragraphs 6.21 to 6.32 and Figure 8 (pages 43-46) show a clear and suitable set of proposals. There is to be no development west of Polegate; housing is proposed to be located in an urban extension south of Polegate and east of Willingdon (Hindslands and Mornings Mill). Paragraph 6.27 of the Core Strategy states: A site was allocated in the 2005 Non Statutory Wealden Local Plan for an urban extension to the north west of Polegate in the vicinity of Honey Farm. However, this proposal was dependent upon the provision of the Folkington Link and other community infrastructure to enable the integration of development into the town. No such infrastructure has been provided or is known to be planned. Since this allocation for South Downs has achieved National Park status and the adjacent Wootton Manor has formally been included in the English Heritage Register of Historic Parks and Gardens. This site has been re-assessed as part of SHLAA and is no longer considered suitable for housing. Paragraph 6.27 of the Core Strategy is strongly supported. The overwhelming arguments against the Honey Farm Location have now been accepted by the District Council. these arguments are: 1. The Honey Farm location would be an isolated development cut off by the A27 trunk road - the 'Folkington Link' no longer being in the trunk road programme. 2. Foot and cycle access to the Honey Farm site would be permanently by footbridges and alleyways directly affecting residents in the Brookside Avenue area of Polegate. 3. The Honey Farm location could not be integrated into the community of Polegate and would be a separate settlement. 4. The setting of the South Downs National Park would be harmed. 5. The setting of the adjacent historic property Wootton Manor, its park and garden would be damaged. The Core Strategy is justified in rejecting the Honey Farm location. The proposed housing location at Hindsland and Mornings Mill is sound and justified.

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Details of Changes to be Made:
Summary of all Representations - Proposed Submission Core Strategy Regulation 27 - Report 11th July 2011

Representation ID
981

Person ID 522477  Stevens

Agent ID 6.31

Paragraph 6.31

Sound ☑ Yes ☐ No ☐ Justified ☐ Effective ☐ Consistent with national policy

Legally Compliant ☐ Yes ☐ No

Details of Reasons for Soundess/ Legal Complaince:
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Details of Changes to be Made:

Sound  Yes  No  Justified  Effective  Consistent with national policy
Legally Compliant  Yes  No
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Sound Yes  No Justified Effective Consistent with national policy
Legally Compliant Yes No

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Details of Changes to be Made:

The council's comments make it clear that these allocations are undeliverable as things stand at the moment, and they seem to have no idea how and if it will be possible to overcome the identified constraints regarding the roads and water infrastructure. There these allocations are unsound and contrary to national policy and SHLAA criteria.

Details of Changes to be Made:
These allocations should be deleted and reallocated to deliverable and sustainable sites.
We support the flexibility contained in Policy WCS3 regarding the distribution of employment floor space between Polegate and Willingdon and Stone Cross. However, in view of the current retail provision in Polegate and the scale of the development planned for the area, we consider that a retail allocation should be included for Polegate, rather than concentrating new provision solely in Uckfield and Hailsham. By improving facilities at Polegate will reduce the need for both existing and future residents to travel further afield to meet their shopping needs, which is especially important in view of the high proportion of elderly residents. Whilst trips will be made to nearby Eastbourne, which is at a higher level of the retail hierarchy, there would be advantage if the day to day needs of residents are met in Polegate. Whilst Polegate town centre is constrained, opportunities may arise through redevelopment and there may be scope for local facilities as part of the new residential growth area.

Details of Changes to be Made:

Yes  Sound  No  Justified  Effective  Consistent with national policy

Legally Compliant  Yes  No

Details of Reasons for Soundess/ Legal Complaince:

Our client has been engaged in discussions with the Council regarding the suitability of this redundant land for development for some time, and has previously submitted representations promoting the site through local plan reviews, and more recently, through the emerging Local Development Framework. In August 2009 King Sturge submitted technical information in support of our submission to the Strategic Housing Land Availability Assessment and representations were made to the Core Strategy Spatial Development Options Consultation Document (July 2009). We support Wealden District Council’s identification of land to the south of Polegate and east of Willingdon as an urban extension for residential, employment, leisure, recreation and community uses (Strategic Development Area 4 in Policy WCS4). Considerable background work and research has been undertaken by the Council in preparing the submission draft of the Core Strategy and we consider the Council have a sound evidence base to support the allocation. We consider this area has significant advantages compared to other locations in the Polegate area, to accommodate future development needs: · This area is well located in relation to existing development at Polegate and Willingdon, and it would form a natural extension. In particular, the area is well related to Polegate town centre (with its facilities as well as the railway station) which is within easy walking distance. There is the opportunity to create links to the town centre as well as other parts of the existing built-up area. The area is well served by existing bus services on Eastbourne Road, as well as the local cycle network. This complies with Planning Policy Statement 3 (Housing) which states that housing developments should be in suitable locations which offer a good range of community facilities and good access to jobs, key services and infrastructure. This should be achieved by making effective use of land and existing infrastructure thus contributing to the achievement of sustainable development. · In terms of potential visual impact on the AONB, including the newly created South Downs National Park, this area has significant advantages compared to other potential locations elsewhere in the Polegate area. · 2 - · The area is of sufficient size to meet the needs for development in the Polegate area during the plan period. · There are no significant constraints to the development of the area in terms of ecology, landscape features or flooding. · The area benefits from the potential to secure vehicular access from Eastbourne Road as well as from other parts of the built-up area of Polegate that lie immediately adjacent. The area is available for development, and offers the opportunity for phased development.

Details of Changes to be Made:
Mr Ankers
South Downs Society

Details of Reasons for Soundness/ Legal Compliance:
Polegate and Willingdon: we very much welcome the principle that strategic land release for housing in this area is to be kept further away from the boundaries of the national park. We welcome the wording of para 6.26 to the effect that impact on views from the downs limits the potential for urban extension especially seen against a rural backdrop north and west of Polegate, and that existing main transport routes provide firm limits to expansion in these directions. Having worked hard in support of Wealden Council and others in opposing the Honey Farm development proposal, not least at the recent public inquiry, we very much support the deletion, following the SHLAA of Honey Farm from the locations included within the 2005 non-statutory plan - for all the reasons set out at the inquiry, including the absence of the Folkington Link from any meaningful programme, the recent national park confirmation and the inclusion of Wootton Manor in English heritage's Register of Historic Parks and Gardens.

Details of Changes to be Made:

Mr Grout

Details of Reasons for Soundness/ Legal Compliance:
The provision of around 700 dwellings on the land to the south of Polegate and to the east of Willingdon is unsound because:- (i) The A2270 is unable to cope with peak traffic flows at present. The additional traffic generated will cause gridlock and no effective way of dealing with this is set out in the Core Strategy. (ii) The land to the east of the A2270 is low lying and prone to flooding. The water table is very high. Building on this land would exceed the drainage capacity and lead to increased flooding. The measures in the Core Strategy are not effective and the plan to build is not justified. (iii) It is essential to keep a green corridor between Polegate and Willingdon for the preservation of wildlife. The measures described in the Core Strategy are not effective for dealing with this. (iv) Building on this land is not justified; there are far more suitable sites elsewhere.

Details of Changes to be Made:
Remove the provision of 700 dwellings etc on the land to he south of Polegate and to the east of Willingdon.
Paragraph 6.31

Details of Reasons for Soundness/ Legal Complaince:
"Supplementary documents have been submitted but not attached, and may be viewed at the Council offices on request". Paragraph 6.31 point 3. Amend to reflect revised strategy for Polegate area and that waste water treatment is no longer a constraint.

Details of Changes to be Made:
REVISION SOUGHT. Delete up to 700 dwellings and replace with "at least 1500 dwellings" for Polegate and replace 650 with 300 for Stone Cross. Bullet Point 3. Delete and replace with "provision of 300 homes within an extension to the urban area of Stone Cross (SD5)". Bullet point 6. Delete "until such time as new infrastructure is in place to treat additional waste water.

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Paragraph 6.31

Details of Reasons for Soundness/ Legal Complaince:
6.31.4 does not make it clear how this development of services and improvement of the High Street will be achieved.

Details of Changes to be Made:

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Paragraph 6.31

Details of Reasons for Soundness/ Legal Complaince:
Concern raised at the reference to Polegate and Willingdon as one settlement

Details of Changes to be Made:
Details of Reasons for Soundess/ Legal Complaince:
Planning Policy Guidance 17: Planning for open space, sport and recreation 17.10 states 'existing open space, sports and recreational buildings and land should not be built on unless an assessment has been undertaken which has clearly shown the open space or the buildings and land to be surplus to requirements.' The Core Strategy refers frequently to the lack of suitable recreational facilities, so the plan to build on an existing on (SD4) is inconsistent. Chapter 17 Paragraph 17.1 of the Wealden non statutory plan states that 'Polegate and Willingdon are adjacent but distinctly different communities located at the foot of the South Downs to the north of Eastbourne. "However the proposed Core Strategy is likely to merge the two settlements for the first time on the east side of the A2270. The urban extension designated SD4 extends across land within both PTC and Willingdon and Jevington Parish Council boundaries. PTC is concerned as to exactly where the development is planned, and how it will impact on the separate Councils in Polegate and Willingdon.

Details of Changes to be Made:
Development of SD4 area will force Willingdon and Polegate into one destroying the unique characteristics of each area as acknowledged in paragraph 2.2. and WCS4 + 6.31(1) and WCS4 6.32(2) and WCS4 + 6.31(3)
Details of Reasons for Soundness/ Legal Compliance:
The Core Strategy is sound and sets out a justified and effective land use strategy for the Polegate area which is consistent with national planning policy. Policy WCS4, Strategic Development Areas, lists as Location SD4 'Land at South Polegate and East Willingdon'. Chapter 6, paragraphs 6.21 to 6.32 and Figure 8 (pages 43-46) show a clear and suitable set of proposals. There is to be no development west of Polegate; housing is proposed to be located in an urban extension south of Polegate and east of Willingdon (Hindsland and Mornings Mill). Paragraph 6.27 of the Core Strategy states: A site was allocated in the 2005 Non Statutory Wealden Local Plan for an urban extension to the north west of Polegate, in the vicinity of Honey Farm. However, this proposal was dependent upon the provision of the Folkington Link and other community infrastructure to enable the integration of development into the town. No such infrastructure has been provided or is known to be planned. Since this allocation the South Downs has achieved National Park status and the adjacent Wootton Manor has formally been included in the English Heritage register of Historic Parks and Gardens. This site has been re-assessed as part of SHLAA and is no longer considered suitable for housing. Figure 8 shows that the land west of Polegate north of the railway line will stay as open countryside adjacent to the National Park. Paragraph 6.27 of the Core Strategy is strongly supported. The Hone Farm or West of Polegate (Pelham Homes) site was included in the Non-Statutory Local Plan in 2004 but that Plan was never subject to a public inquiry. Those affected by the Honey Farm site were not permitted in 2004-05 to oppose it by advancing a different location for the housing, as the opportunity to propose a different location was stated then to be given by the Local Development Framework process in 2005-07. That was delayed and this stage has only now been reached with this Core Strategy. The overwhelming arguments against the Honey Farm location have now been accepted by the District Council. These arguments are: The Honey Farm location would be in isolated development cut off by the A27 trunk road - the 'Folkington Link' no longer being in the trunk road programme; Foot and cycle access to the Honest Farm site would be permanently by footbridges and alleyways directly affecting residents in the Brookside Avenue area of Polegate; The Honey Farm location could not be integrated into the community of Polegate and would be a separate settlement; The setting of the South Downs National Park would be harmed; The setting of the adjacent historic property Wooton Manor, its park and garden would be damaged. The Core Strategy is justified in rejecting the Honey Farm location. The proposed housing location at Hindsland and Morning Mill is sound and justified. If that housing location does not prove to be the best site on further study, the preferred location for housing in the Polegate Town Council Masterplan should be chosen. This is the area north of Polegate and south of the A27 Bypass which is also considered suitable in the 2010 Strategic Housing Land Availability Assessment.

Details of Changes to be Made:
Paragraph 6.32

Details of Reasons for Soundess/ Legal Complaince:
The Core Strategy is sound and sets out a justified and effective land use strategy for the Polegate area which is consistent with national planning policy. Policy WCS4, Strategic Development Areas, lists as Location SD4 'Land at South Polegate and East Willingdon'. Chapter 6, paragraphs 6.21 to 6.32 and Figure 8 (pages 43-46) show a clear and suitable set of proposals. There is to be no development west of Polegate; housing is proposed to be located in an urban extension south of Polegate and east of Willingdon (Hindslands and Mornings Mill). Paragraph 6.27 of the Core Strategy states: A site was allocated in the 2005 Non Statutory Wealden Local Plan for an urban extension to the north west of Polegate, in the vicinity of Honey Farm. However, this proposal was dependent upon the provision of the Folkington Link and other community infrastructure to enable the integration of development into the town. No such infrastructure has been provided or is known to be planned. Since this allocation the South Downs has achieved National Park status and the adjacent Wootton Manor has formally been included in the English Heritage register of Historic Parks and Gardens. This site has been re-assessed as part of SHLAA and is no longer considered suitable for housing. Figure 8 shows that the land west of Polegate north of the railway line will stay as open countryside adjacent to the National Park. Paragraph 6.27 of the Core Strategy is strongly supported. The Hone Farm or West of Polegate (Pelham Homes) site was included in the Non-Statutory Local Plan in 2004 but that Plan was never subject to a public inquiry. Those affected by the Honey Farm site were not permitted in 2004-05 to oppose it by advancing a different location for the housing, as the opportunity to propose a different location was stated then to be given by the Local Development Framework process in 2005-07. That was delayed and this stage has only now been reached with this Core Strategy. The overwhelming arguments against the Honey Farm location have now been accepted by the District Council. These arguments are: The Honey Farm location would be in isolated development cut off by the A27 trunk road - the 'Folkington Link’ no longer being in the trunk road programme; Foot and cycle access to the Honest Farm site would be permanently by footbridges and alleyways directly affecting residents in the Brookside Avenue area of Polegate; The Honey Farm location could not be integrated into the community of Polegate and would be a separate settlement; The setting of the South Downs National Park would be harmed; The setting of the adjacent historic property Wooton Manor, its park and garden would be damaged. The Core Strategy is justified in rejecting the Honey Farm location. The proposed housing location at Hindsland and Morning Mill is sound and justified. If that housing location does not prove to be the best site on further study, the preferred location for housing in the Polegate Town Council Masterplan should be chosen. This is the area north of Polegate and south of the A27 Bypass which is also considered suitable in the 2010 Strategic Housing Land Availability Assessment.

Details of Changes to be Made:
**Details of Reasons for Soundness/ Legal Complaince:**

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**Details of Changes to be Made:**

<table>
<thead>
<tr>
<th>Sound</th>
<th>Legally Compliant</th>
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<td>Yes</td>
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Yes

Consistent with national policy

No

Legally Compliant

Yes
Details of Reasons for Soundess/ Legal Complaince:

The Core Strategy is sound and sets out a justified and effective land use strategy for the Polegate area which is consistent with national planning policy. Policy WCS4, Strategic Development Areas, lists as Location SD4 'Land at South Polegate and East Willingdon'. Chapter 6, paragraphs 6.21 to 6.32 and Figure 8 (pages 43-46) show a clear and suitable set of proposals. There is to be no development west of Polegate; housing is proposed to be located in an urban extension south of Polegate and east of Willingdon (Hindslands and Mornings Mill). Paragraph 6.27 of the Core Strategy states: A site was allocated in the 2005 Non Statutory Wealden Local Plan for an urban extension to the north west of Polegate, in the vicinity of Honey Farm. However, this proposal was dependent upon the provision of the Folkington Link and other community infrastructure to enable the integration of development into the town. No such infrastructure has been provided or is known to be planned. Since this allocation the South Downs has achieved National Park status and the adjacent Wootton Manor has formally been included in the English Heritage register of Historic Parks and Gardens. This site has been re-assessed as part of SHLAA and is no longer considered suitable for housing. Paragraph 6.27 of the Core Strategy is strongly supported. The overwhelming arguments against the Honey Farm location have now been accepted by the District Council. These arguments are: The Honey Farm location would be in isolated development cut off by the A27 trunk road - the 'Folkington Link' no longer being in the trunk road programme; Foot and cycle access to the Honest Farm site would be permanently by footbridges and alleyways directly affecting residents in the Brookside Avenue area of Polegate; The Honey Farm location could not be integrated into the community of Polegate and would be a separate settlement; The setting of the South Downs National Park would be harmed; The setting of the adjacent historic property Wooton Manor, its park and garden would be damaged. The Core Strategy is justified in rejecting the Honey Farm location. The proposed housing location at Hindsland and Morning Mill is sound and justified.

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Details of Changes to be Made:
Representation ID 245
Person ID 521465
Agent ID 6.32

Details of Reasons for Soundness/ Legal Compliance:
The Core Strategy is sound and sets out a justified and effective land use strategy for the Polegate area which is consistent with national planning policy. Policy WCS4, Strategic Development Areas, lists as Location SD4 'Land at South Polegate and East Willingdon'. Chapter 6, paragraphs 6.21 to 6.32 and Figure 8 (pages 43-46) show a clear and suitable set of proposals. There is to be no development west of Polegate; housing is proposed to be located in an urban extension south of Polegate and east of Willingdon (Hindslands and Mornings Mill). Paragraph 6.27 of the Core Strategy states: A site was allocated in the 2005 Non Statutory Wealden Local Plan for an urban extension to the north west of Polegate, in the vicinity of Honey Farm. However, this proposal was dependent upon the provision of the Folkington Link and other community infrastructure to enable the integration of development into the town. No such infrastructure has been provided or is known to be planned. Since this allocation the South Downs has achieved National Park status and the adjacent Wootton Manor has formally been included in the English Heritage register of Historic Parks and Gardens. This site has been re-assessed as part of SHLAA and is no longer considered suitable for housing. Paragraph 6.27 of the Core Strategy is strongly supported. The overwhelming arguments against the Honey Farm location have now been accepted by the District Council. These arguments are: The Honey Farm location would be in isolated development cut off by the A27 trunk road - the 'Folkington Link' no longer being in the trunk road programme; Foot and cycle access to the Honest Farm site would be permanently by footbridges and alleyways directly affecting residents in the Brookside Avenue area of Polegate; The Honey Farm location could not be integrated into the community of Polegate and would be a separate settlement; The setting of the South Downs National Park would be harmed; The setting of the adjacent historic property Wooton Manor, its park and garden would be damaged. The Core Strategy is justified in rejecting the Honey Farm location. The proposed housing location at Hindsland and Morning Mill is sound and justified.

Details of Changes to be Made:

Yes Sound No Justified Effective Consistent with national policy

Yes Legally Compliant No
Summary of all Representations - Proposed Submission Core Strategy Regulation 27 - Report 11th July 2011

Representation ID
259

Person ID  Miss  Hunter  Agent ID
330812

Paragraph  6.32

Sound  Yes  No  Justified  Effective  Consistent with national policy

Legally Compliant  Yes  No

Details of Reasons for Soundess/ Legal Complaince:
The Core Strategy is sound and sets out a justified and effective land use strategy for the Polegate area which is consistent with national planning policy. Policy WCS4, Strategic Development Areas, lists as Location SD4 'Land at South Polegate and East Willingdon'. Chapter 6, paragraphs 6.21 to 6.32 and Figure 8 (pages 43-46) show a clear and suitable set of proposals. There is to be no development west of Polegate; housing is proposed to be located in an urban extension south of Polegate and east of Willingdon (Hindslands and Mornings Mill). Paragraph 6.27 of the Core Strategy states: A site was allocated in the 2005 Non Statutory Wealden Local Plan for an urban extension to the north west of Polegate, in the vicinity of Honey Farm. However, this proposal was dependent upon the provision of the Folkington Link and other community infrastructure to enable the integration of development into the town. No such infrastructure has been provided or is known to be planned. Since this allocation the South Downs has achieved National Park status and the adjacent Wootton Manor has formally been included in the English Heritage register of Historic Parks and Gardens. This site has been re-assessed as part of SHLAA and is no longer considered suitable for housing. Paragraph 6.27 of the Core Strategy is strongly supported. The overwhelming arguments against the Honey Farm location have now been accepted by the District Council. These arguments are: The Honey Farm location would be in isolated development cut off by the A27 trunk road - the 'Folkington Link' no longer being in the trunk road programme; Foot and cycle access to the Honest Farm site would be permanently by footbridges and alleyways directly affecting residents in the Brookside Avenue area of Polegate; The Honey Farm location could not be integrated into the community of Polegate and would be a separate settlement; The setting of the South Downs National Park would be harmed; The setting of the adjacent historic property Wooton Manor, its park and garden would be damaged. The Core Strategy is justified in rejecting the Honey Farm location. The proposed housing location at Hindsland and Morning Mill is sound and justified.

Details of Changes to be Made:

Representation ID
678

Person ID  Mr  Allan  Agent ID
103494

Paragraph  6.32

Sound  Yes  No  Justified  Effective  Consistent with national policy

Legally Compliant  Yes  No

Details of Reasons for Soundess/ Legal Complaince:
The traffic from the A2270 turning left into the A27 often results in a blockage at Polegate traffic lights. To accommodate any increase in traffic the A27 will need to be made into a dual carriage way. The A2270 in its present form is incapable of taking an increased volume of traffic and maintaining traffic flow. As this is a built up area domestic properties restrict the road being widened. Although 8600 sq metres of employment floorspace is being allowed for at Willingdon this will itself create more traffic requiring access.

Details of Changes to be Made:
Paragraphs 6.21 - 6.30 of the document provide further information to support the Council’s policy approach towards further development at Stone Cross and this is supported. Text at paragraph 6.31 identifies the potential split in housing delivery between the two strategic development areas of Stone Cross (SD6 and SD7) although it is noted that there is flexibility here subject to the local highway improvements required to accommodate the development. This flexibility within the overall strategy to deal with changing circumstances is welcomed and is considered to ensure the Core Strategy is effective in line with the requirements of paragraphs 4.44 and 4.46 of PPS12. Sites north of Rattle Road, east of Stone Cross within SD6 have been determined within the SHLAA to be deliverable housing sites. It is acknowledged that the development of these sites would have a limited impact on the landscape and that structural planning can mitigate any local impact as well as protect against potentially conflicting land uses. Between the two sites in the SHLAA east of Stone Cross, north of Rattle Road, the landowners are collaborating with regard to access and evidence of this will be forwarded to the District council in due course. Likewise, a Phase 1 Habitats Survey has been commissioned to support the general masterplan development of this location and again this will be forwarded to the Council following its completion to provide further evidence of the suitability of this location for development. As the Council will be aware, my client’s land (The Oaks, Rattle Road - SLHAA ref: 415/3280) fronts directly onto Rattle Road, is in the control of one single landowner, can be brought forward for development at any time and to the best of our knowledge is free from any environmental constraint. In this respect, we consider its inclusion within the identified SD6 Strategic Development Area is sensible and reflects a sound approach that will contribute to ensuring the Core Strategy is deliverable, founded on a robust and credible evidence base and is the most appropriate strategy when considered against the reasonable alternatives. The Council has engaged with the community in its consultations on the Issues and Options Paper 2007 and the Spatial Development Options Consultation in 2009. The comments from these consultations, particularly with regard to the need for affordable housing, have been reflected in the emerging policies. We are also aware that the Council continues to engage with Parish Councils in the area, including Jevington and Westham Parish Councils, to help reflect their vision for the settlements and service provision. As a result I agree that the Core Strategy is generally sound (subject to my comments concerning Policy WCS1), and demonstrates effectiveness in the delivery of development in this part of the District. I therefore consider Strategic Development Area SD6 in the Proposed Submission Core Strategy to be ‘sound’ in terms of the tests in Planning Policy Statement 12. I consider it justified, based on credible and robust evidence and effective with regard to delivery and flexibility and is consistent with national policy.

Details of Changes to be Made:
Summary of all Representations - Proposed Submission Core Strategy Regulation 27 - Report 11th July 2011

Representation ID
531

Person ID  Mrs Bartholomew
Agent ID
330714

Paragraph 6.32

Details of Reasons for Soundess/ Legal Complaince:
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Details of Changes to be Made:
Yes
Sound Yes No Justified Effective Consistent with national policy
Legally Compliant Yes No
Details of Reasons for Soundness/ Legal Compliance:

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Details of Changes to be Made:
Paragraph 6.32

Details of Reasons for Soundness/ Legal Complaince:

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Details of Changes to be Made:
Details of Reasons for Soundess/ Legal Complaince:
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Details of Changes to be Made:

Details of Reasons for Soundess/ Legal Complaince:
The council's comments make it clear that these allocations are undeliverable as things stand at the moment, and they seem to have no idea how and if it will be possible to overcome the identified constraints regarding the roads and wast water infrastructure. There these allocations are unsound and contrary to national policy and SHLAA criteria.

Details of Changes to be Made:
These allocations should be deleted and reallocated to deliverable and sustainable sites.
Details of Reasons for Soundess/ Legal Complaince:
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Details of Changes to be Made:
Summary of all Representations - Proposed Submission Core Strategy Regulation 27 - Report 11th July 2011

Representation ID
861

Person ID    Miss    Koral
Agent ID
533641

Paragraph 6.32

Details of Reasons for Soundness/ Legal Complaince:
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Details of Changes to be Made:

Yes  Sound
No   Justified
Yes  Effective
No   Consistent with national policy

Legally Compliant
Yes
No
Details of Reasons for Soundness/ Legal Compliance:

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Details of Changes to be Made:
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Details of Changes to be Made:

Sound Yes No Justified Effective Consistent with national policy

Legally Compliant Yes No
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Details of Changes to be Made:
Paragraph 6.32

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Details of Changes to be Made:
Summary of all Representations - Proposed Submission Core Strategy Regulation 27 - Report 11th July 2011

Representation ID
1134

Person ID  Mr Hayward
Agent ID
107124

Paragraph  6.32

Sound  Yes  No  Justified  Effective  Consistent with national policy
Legally Compliant  Yes  No

Details of Reasons for Soundness/ Legal Compliance:
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Representation ID
1054
Person ID Ms Buckland Agent ID
522484

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The section fails to properly assess the suitability of Stone Cross as a settlement to accommodate future growth whilst recognising the significant development that has occurred in this modest settlement in the last 15 years of the twentieth century. The amalgamation of Stone Cross with Polegate/Willingdon is a disingenuous attempt to improve the credentials of Stone Cross and deflect from the fact that it should not be designated a Service Centre rather a Local Service Centre or Neighbourhood Centre. However the amalgamation of these settlements will be a consequence of the strategy if pursued thus leading to an erosion of local identity and a further erosion of the pattern and character of settlements within the district (see key diagram and the amalgamation of settlement if SD5, SD7 and SD6 go ahead leading to a linear continuance settlement along the A27 as the gaps between Polegate, Stone Cross and Westham are closed) contrary to the stated aims of the Core Strategy (see for example 2.4, 2.7, 2.21 and 3.4)

Details of Changes to be Made:
Delete reference to Stone Cross and deal with Polegate and Willingdon, remove urban extensions to Stone Cross or significantly amend to reduce the scale of provision at Stone Cross commensurate and proportionate to the settlement size (estimated 3000-4000). replace part of the Stone Cross northern urban extension with a more sustainable extension to the south of Hailsham (300 - 350 homes); which would also be served by the South Hailsham Water Treatment Plant and thus would not introduce any new infrastructure issues beyond those of Stone Cross allocations.

Details of Reasons for Soundess/ Legal Complaince:
1.1 Paragraph 6.32 is unsound. It highlights risks to delivery of the strategy for Polegate, Willingdon and Stone Cross which are caused by the need for highways infrastructure. It should also highlight the risk to delivery of the urban extenstions because of multiple land ownerships. The potential of ransom situations developing between landowners should be minimised to ensure that the development is integrated and sustainable and can be phased to meet the District's requirements. This should be clearly set out in the Core Strategy so that the Core Strategy is effective by being deliverable. Ransom situations can cause delay to delivery taking control of the phasing away from the Council. Ransoms will also add to some developers costs making sites less viable. This in turn can put at risk infrastructure that must be funded by development. 1.2 For ransom situations between developers to be prevented the forthcoming Strategic Sites DPD should set out that master plans should be prepared for the development of the urban extensions. These should identify highway land that should be dedicated to avoid ransom situations between landowners so that the development parcels can be linked together.

Details of Changes to be Made:
Paragraph 6.32 should be amended with a new sentence after the final sentence to state that: "It is important to ensure that the potential for ransom situations between land owners in the urban extenstions are prevented. this will ensure that the housing requirements of the Core Strategy are deliverd in a phase manner to meet the requirements of the Distieict and that appropriate infrastructure can be delivered when required!.
I have examined the Proposed Submission Core Strategy (PSCS) against the Soundness Tool and found it wanting in terms of justification and effectiveness. The PSCS is a carefully prepared document, well thought out to offer a plan for the future but it does not take full account of the background research and documentation upon which it is based. In particular the proposals to expand Hailsham to the north do not comply with the sustainability or infrastructure objectives for Wealden and the proposals for development to the east and north of Hailsham are contrary to previous WDC research and to current Background Papers. Participation The consultation process has permitted all interested parties to engage but the options for answering have been strictly limited on a Yes or No basis when, in fact, more discursive answers are needed. Research/Fact Finding The content of the PSCS is not permitted all interested parties to engage but the options for answering have been strictly limited on a Yes or No basis when, in fact, more discursive answers are needed.

Details of Reasons for Soundness/ Legal Complaince:

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Research/Fact Finding The content of the PSCS is not justified by the evidence, particularly in respect of infrastructure and especially highways and sewerage. Document No 7 Infrastructure Position Statement dated July 2009 refers under (A) Transport to the need to reduce travel distances. The PSCS shows strategic development to North and East Hailsham and towards Hellingly at distances from the town centre of up to 2.2 km. The South Wealden & Eastbourne Transport Study (SWETS) in paragraph 3.29 makes it clear that development for major housing allocations in north and east Hailsham would cause significant traffic pressure. Fewer pinch points and reduced traffic pressure are shown for development south of Hailsham. BP No 11 Infrastructure Delivery Plan defines the highways issue for development to the north and east as ‘CRITICAL’ and states ‘Development is contingent on delivery of this infrastructure’. Regarding sewerage/waste water capacity, as outlined in BP No 11, Hailsham North wastewater works had a consented discharge capacity at 1st Jan 2007 at 2900 dwellings. Hailsham South wastewater works had a capacity of 2400 dwellings at same date. This same document shows infrastructure developments in the Appendix for the North water treatment works is deemed CRITICAL to deliver 1500 dwellings. In the south of Hailsham ‘A scheme is not necessary to deliver the proposed Submission Core Strategy. However a scheme may be required for windfalls of housing and employment development.’ The same Background Paper states under ‘Further Supporting Evidence’: ‘Infrastructure is not necessary to achieve the full allocation of development in Hailsham, Polegate and Stone Cross as shown in the proposed Submission Core Strategy.’ This reliance on ‘massing’ in the north of Hailsham therefore has infrastructure issues which could be avoided by reducing the size of the Strategic Development Areas and spreading the housing to the south of the town. According to the Housing Needs Assessment the greatest number of low income families are located to the south and such development would help to balance with Affordable and mixed housing. The Table at the end of BP 11 sets out water treatment for extant Planning Permissions and completions from April 2006-April 2010 and states that there are capacity issues arising in the north from the Spatial Strategy but not in the south. The Conclusions to BP 11 state that wastewater funding has been secured from Offwat for works in 2012 to increase capacity in the Hailsham area and to undertake a study to investigate other technical solutions. The financial solution would be via appropriate developer contributions. In summary, therefore, according to BP11 there are no capacity issues in South Hailsham providing development is not beyond 2400 houses, less 885 already approved – namely 1515 dwellings in Polegate, , Stonecross and South Hailsham. The Oaklands/Brickfield SHLAA site 100/1310 (224 dwellings) includes an East Sussex County Council approved road scheme to allow capacity for up to 300 dwellings. Landscape In January 2001 WDC prepared the ‘Low Weald Towns Sector Appraisal Landscape’ as part of the Background Papers for the then Local Plan Review. This document is partly incorporated in Background Paper No 6 Green Infrastructure. BP 6 does not include the following relevant paragraph about the landscape around Hailsham: ‘South of Hailsham: ....Urban Influence: On the western side of the sector the urban edge of Hailsham is generally well concealed by woodland often in deep ghylls or valleys. Scattered farms and houses are linked by a network of roads and lanes, the latter often sunk between high overgrown hedges. Horse grazing is common, a reflection of urban pressures, and as a result many of the pastures have the unkempt rather untidy appearance of paddocks. Rough sheds, water troughs and other paraphernalia are common place. ‘..’ Under the heading ‘Sensitivity to Development’ the Landscape Appraisal states: ‘The relatively open aspect of the landscape east of the Cuckmere flood plain makes it sensitive to change by new development and any large scale expansion of the built form beyond the existing urban edge of Hailsham in this location would tend to damage the rural setting of the town. .. ‘ However there is very little scope for additional development on the western edge of the sector without threatening the intrinsic qualities of the landscape and more particularly the rural settings of Hellingly and Horselunges Manor. Importantly the urban influence of Hailsham is hardly noticeable in this reach of the Cuckmere valley apart from some ribbon development along the A271 on the immediate fringes of the town. Any significant expansion of the built form in this location (Hellingly/North Hailsham) would be likely to erode the historic landscape, structure and rural
character of this valuable landscape and irreparably damage the vulnerable gap of countryside between Hailsham and Hellingly.' The Sustainability Appraisal sets out on p 42 the Sustainability Objectives for Wealden. The environmental objectives include: 7. ‘To make the most efficient use of land by prioritising brownfield sites for development, the re-use of existing buildings and promoting higher development densities.’ 11. ‘To conserve, enhance and make accessible for enjoyment the District’s countryside (in particular protecting the best and most versatile agricultural land) landscape, historic and built environment.’ 12. ‘Reduce the need to travel by car and promote alternative methods of transport.’ Development north and east of Hailsham is contrary to all or most of these objectives because it would increase travel distance, increase reliance on motor cars and damage the landscape and countryside, being on greenfield sites. SHLAA site 100/1310 Oaklands & The Brickfield are on a previously developed site, the Brickfield being defined as ‘Brownfield’. Oaklands, being used for business ‘horsy culture’ and not agriculture is also classified as ‘brownfield/previously developed’ under PPS3. Development of these sites south of Hailsham therefore complies with the environmental objectives set out in the Sustainability Appraisal. Alternatives The Council’s chosen approach in the PSCS is therefore not the most appropriate given the reasonable alternatives and it goes against the Background Papers and existing evidence base. It would appear from the PSCS that sustainability considerations have not informed its content from the start. In particular, it is stated at Para 6.30 of the PSCS that the Polegate, Willingdon, Stonecross development of 700 dwellings can only take place when formal road infrastructure is in position. Therefore SD4 is not programmed to start until 2019/20. Similarly, Para 5.16 states that the proposed northern urban extension of Hailsham (SD2 & SD3) cannot occur without infrastructure improvements namely sewerage and roads. Hence SD2 cannot start until 2017 and SD3 until 2021. I would submit that this issue of roads indicates that, by definition, the Strategic Development Areas forming the northern extension of Hailsham towards Hellingly and those in Polegate, Willingdon and Stone cross are unsustainable. The PSCS was initially prepared in its Draft and Consultation forms on the basis of the requirements of the South East Plan. This is now being abandoned and will no longer be valid. Because the Draft Core Strategies and most of the evidence gathering and Background Papers were prepared in accordance with the South East Regional Plan, the current PSCS is probably invalid and I would submit that the Inspector should examine this. Delivery The Council has correctly identified the main issues that the PSCS is seeking to address but does not present a clear vision for Wealden District into the future, only the equivalent of a ‘wish list’ of construction of 400 houses a year and sufficient commercial development for employment. It does not clarify how to achieve this, particularly in respect of infrastructure. The major strategic development north and east of Hailsham introduce an unacceptable risk in the ability to provide the infrastructure. Cross boundary issues have not been adequately addressed. In particular with Mid Sussex District Council and associated County Council Highways liaison for a relief road around East Grinstead. Nor does it address the problems of coalescence between Polegate, Willingdon and Stonecross and Eastbourne Councils, nor does it address the cross boundary issues which will arise with Lewes District Council, particularly in connection with development around Uckfield. The PSCS sets out objectives in terms of construction and development but does not connect these in sufficient detail with the necessary infrastructure. The most obvious gap in the policies is related to transport, in that the entire PSCS is predicated on continued and developing use of motor vehicles, there being no positive action proposed in relation to the Uckfield-Lewes Railway line and only passing mention of the possibility of public transport or reinstated railway from Hailsham southwards to Polegate and Eastbourne. The timescales given in the Plan are governed by the moribund South East Plan and are not realistic, particularly in respect of infrastructure provision and especially given the proposals in the PSCS for development north of Hailsham which will rely on the motor car. This is contrary to Spatial Planning Objective 7. Currently the Strategic Development Areas SD2, SD3, SD4, SD6 & SD7 are all undeliverable as set out in Paras 3.16, 6.19 & 6.31 due to lack of existing highways infrastructure. This amounts to 2650 dwellings which cannot be delivered. Flexibility It is not clear whether the PSCS will be flexible enough to respond to a variety of, or unexpected changes in, circumstances, whether environmental, political or economic. Currently there is no clear plan for updating it. It cannot be very flexible because of the infrastructure constraints in Wealden District. Summary The PSCS does not explain how its key policy objectives will be achieved because it is based on the South East Plan which is being abolished. Most of the supporting documents are also based around the South East Plan and pre-date its abolition. The proposals for Strategic Development housing north and east of Hailsham and in Polegate, Willingdon & Stonecross are all undeliverable because of lack of highways infrastructure and, in the north, due to lack of sewerage capacity. These proposals therefore contradict Wealden’s own sustainability and environmental objectives. The PSCS does not take proper account of some sites in the SHLAA which are recognised as suitable and which meet sustainability objectives better than those selected for ‘Strategic Development’. The Oaklands and Brickfield site south of Hailsham (SHLAA 100/1300; 224 dwellings) is largely on previously-developed (brownfield) land and has a highways scheme for the Ersham Road roundabout agreed with East Sussex County Council and should be included in the SDAs to the exclusion of less suitable development. It meets the Hailsham Sustainability Objectives, being a local Urban Extension within walking distance of Hailsham town centre and offering proximity to open space, woodland and biodiversity – at a scale capable of delivering up to 224 dwellings with minimum impact on infrastructure and environmental amenity. This PSCS has given careful consideration to the issues within the Wealden area but falls short of achieving deliverability because of a decision to favour massing over locality, with all the consequent risks involved in reliance on a minimum number of SDAs and with an intention to release more greenfield sites than is compliant with government recommendations. I welcome the Review and monitoring procedures inherent in the PSCS but this document is currently unsound.
Summary of all Representations - Proposed Submission Core Strategy Regulation 27 - Report 11th July 2011

Details of Changes to be Made:
Reduction of development volumes in Polegate, Willingdon and Stonecross in favour of urban extensions on the south side of Hailsham to resolve infrastructure constraints.

Representation ID
1617
Person ID 107745
Agent ID 102625

Paragraph 6.32
Sound □ Yes □ No □ Justified □ Effective □ Consistent with national policy
Legally Compliant □ Yes □ No

Details of Reasons for Soundess/ Legal Complaince:
"Supplementary documents have been submitted but not attached, and may be viewed at the Council offices on request".

Details of Changes to be Made:
REVISION SOUGHT: Delete

Representation ID
53
Person ID 514974
Agent ID 514224

Paragraph 6.35 to 6.36 – The main concern is that the strategy seeks to emphasise the role of the Pine Grove site for housing as opposed to its retention for employment uses. This is considered contrary to PPS4, PPG13 and results in an ineffective strategy. The solution is to identify more housing to the south and southeast of Crowborough and reinforce the Pine Grove site as being suitable for predominantly employment type uses. The Pine Grove site referred to in this paragraph is considered an important employment area in a highly sustainable location. The reference in the paragraph to ‘no decision being taken on the future use of this site’ means that the strategy is ineffective – it is surely the purpose of the Core Strategy to help direct development to suitable locations. This aside, identifying the site under paragraph 6.36 for high density housing would not be the most effective/appropriate strategy and would be contrary to PPS4, PPG13 and employment protection policies. Whilst some housing may be appropriate, the site should principally be retained for employment type uses. Its retention for mainly employment purposes would help maintain a balanced town centre economy. Its loss to housing would mean that the vitality of the town centre is wholly dependent on retail. This would not maintain a sustainable town centre. A more appropriate and effective strategy will be to identify Pine Grove for mainly employment uses and to reinforce housing to the south and south east of the town. The area of Tubwell Lane referred to here is considered to be contiguous with the built up area and would provide scope for growth and a better defined boundary to the AONB. This approach will require some changes to paragraph 6.35 to 6.36 to give more certainty to the Pine Grove site for employment uses, and to compensate for the reduced housing by amending the Key Diagram and paragraph 6.38.

Details of Changes to be Made:
Amend Key diagram on page 49 to annotate the Pine Grove as ‘primarily employment development’ Amend pink annotation of SD10 to also include areas around Tubwell Lane. Amend paragraph 6.38 to reduce the anticipated housing in the town centre and Pine Grove from 140 to 60 and to increase the number of dwellings at SD10 to 240
1. The description of Crowborough set out in paragraph 6.33 includes a number of comments that are either incorrect, or of questionable relevance. It is suggested that the number of people living in the town that also work in the town is low. However there is no indication as to what the Council think it should be. There can be no doubt that compared to Stone Cross and Westham, Willingdon and Polegate the proportion is actually much higher, and yet the strategy aims to locate far more housing in these settlements than Crowborough. There is no justification for this inconsistent approach. 2. The Council mentions that the railway station is some distance from the town centre. In practice however, the majority of residents of Crowborough do not live in the town centre, and a very large proportion of them live within easy walking distance of the railway station. The service is well used. By comparison, Hailsham, where much the largest housing allocations are proposed, does not have a railway service at all, as well as reatatively limited bus links. The location of Crowborough’s railway station is no justification for suggesting that the town is less suited to new development. 3. The Council refers to out-commuting to Tunbridge Wells, East Grinstead aned Uckfield however there is no mention of the number of Crowborough residents that commute into London. It is not accepted that significant number of Crowborough residents commute to East Grinstead or Uckfield, however it is known that a very large number commute to London using the train service. This is a sustainable form of living and working which the Council has made no reference to. 4. The Council states that “the employment centres in town attract vehicles along unsuitable restricted residential roads”. This is a wholly misleading over-generalisation. Not all existing employment sites are as inaccessible as suggested. 5. The need for more employment in the town and the significant housing need that exists are clear and should be given significant weight. What should be taken into account is the stronger housing market that in the town compared to the rest of the district. The fact that it is close to Tunbridge Wells makes it a desirable place to live. This means that it can deliver housing at a higher and more consistent rate than many other parts of the District. 6. The Core Strategy is considered to be unsound on the basis that insufficient new homes are allocated for the town. This is demonstrated by reference to paragraph 6.33 which identifies a current need for 305 new affordable homes. The Core Strategy identifies only 300 new homes in total for Crowborough over its 24 year duration, which is less than its current level of need for affordable homes alone. This would appear to be a fundamental flaw in the strategy and demonstrable proof that the Core Strategy under-provides new housing allocations fro Crowborough. On the basis that new development will need to provide 35% affordable homes, Crowborough will need to have allocated a minum of 872 new homes to deliver the level of affordable housing that is presently required. Clearly for future affordable provision to be yielded, the allocated figure would need to be significantly higher. 7. It is considered that the Core Strategy is unsound in that it cannot meet the future housing needs of market homes and affordable homes through the allocation proposed in Policy WCS2. Figure 10 identifies land for an urban extension to the south-east of the town. This land is not in the AONB, well away from the exclusion zone around the Ashdown Forest Special Protection Area, close to the station and close to existing employment area. In view of all of these factors, and the ability of Crowborough to deliver more houses within the plan period than many of the other settlements it is considered that there is no justification in restricting the number of new dwellings allocated for the twon to just 300. The town could easily deliver 90 additional dwellings per year over the remainder of the plan period and the number allocated should be at least 900. 8. In this context, the residential provision identified as a contingency urban extension on land north of the A16 should be brought forward for development and not be dependent on progress on other sites. This land is available for development now, it is in a sustainable location and is deliverable. Although within the AONB it can be developed while at the same time preserving its main landscape features. Housing development will not be intrusive into the surrounding landscape and will appear as a logical contained extension to the built up area of the town. In order to illustrate these points two drawings have been appended. One shows the opportunities and constraint that effect the site, and the other is a simple masterplan of how the site might be developed for housing while preserving the tree lines and hedgerows which represent the key landscape features on the site. The site also provides the opportunity to make a direct contribution to the reacreational facilities at the adjoining Goldmsiths Leisure Centre as part of any scheme.

Details of Changes to be Made:
At least 900 new dwellings should be provided at Crowborough (in addition to existing commitments etc.) Land North of the A26 should be identified for development immediately and not be a ‘contingency site’.
Details of Reasons for Soundness/ Legal Compliance:
The Core Strategy is considered to be unsound on the basis that insufficient new homes are allocated for the town. This is demonstrated by reference to paragraph 6.33 which identifies a current need for 305 new affordable homes. The Core Strategy identifies only 300 new homes in total for Crowborough over its 24-year duration, which is less than the current level of need for affordable homes on their own. This would appear to be a fundamental flaw in the strategy and demonstrable proof that the Core Strategy under-provides new housing allocations for Crowborough. On the basis that new development will need to provide 35% affordable homes, Crowborough will need to have allocated a minimum of 872 new homes to deliver the level of affordable housing that is presently required. Clearly for future affordable provision to be yielded, the allocated figure would need to be significantly higher. It is considered that the Core Strategy is unsound in that it cannot meet the future housing needs for market homes and affordable homes through the allocations proposed in Policy WCS2. To make the Core Strategy sound, it is considered that the housing allocation should be increased to a figure in the order of 900 new homes. The description of Crowborough set out in paragraph 6.33 includes a number of comments that are either incorrect, or of questionable relevance. It is suggested that the number of people living in the town that also work in the town is low, however there is no indication as to what the Council think it should be. there can be no doubt that compared to Stone Cross and Westham, Willingdon and Polegate the proportion is much higher, and yet the strategy aims to locate far more housing in these settlements than Crowborough. there is no justification for this inconsistent approach. The Council mentions that the railway station is some distance from the town centre. The residents of Crowborough do not all live in the town centre, and a very large proportion of them live within easy walking distance of the railway station. The service is very well used. Hailsham, where the largest housing allocations are proposed, does not have a railway service at all, as well as relatively limited bus links. The location of Crowborough's railway station is no justification for suggesting that the town is less suited to new development. The Council refers to out-commuting to Tunbridge Wells, East Grinstead and Uckfield, however there is no mention of the number of Crowborough residents that commute into London. It is not accepted that a significant number of Crowborough residents commute to East Grinstead or Uckfield, however it is known that a very large number commute to London, using the train service. This is a sustainable form of living and working which the Council has made no reference to. The Council states the “the employment centres in the town attract vehicles along unsuitable restricted residential roads”. this is a wholly misleading over-generalisation. Not all existing employment sites are as inaccessible as suggested. The need for more employment in the town, and the significant housing need that exists are clear and should be given significant weight. What should be taken into account is the stronger housing market in the town compared to much of the rest of the district. The fact that it is close to Tunbridge Wells makes it a desirable place to live, as does the good train service into London, and the attractive landscape around the town. this means that it can deliver housing at a higher and more consistent rate than many other parts of the District.

Details of Changes to be Made:
Figure 9 identifies land for an urban extension to the south east of the town, and for residential development at Jarvis Brook. None of this land is within the AONB, it is well away from the exclusion zone around the Ashdown Forest Special protection Area, and is close to the railway station adn existing employment areas. In view of all of these factors, and the ability of Crowborough to deliver more houses within the plan period than many of the other settlements it is considered that there is no justification in restricting the number of new dwellings allocated for the town to just 300. The town could easily deliver 90 additional dwellings per year over the remainder of the plan period and the number allocated should be at least 900.
Details of Reasons for Soundess/ Legal Complaince:
Crowborough Area Strategy (paragraphs 6.33 – 6.38: Policy WCS2, Figure 9) 1 The Core Strategy is considered to be unsound on the basis that insufficient new homes are allocated for the town. This is demonstrated by reference to paragraph 6.33 which identifies a current need for 305 new affordable homes. The Core Strategy identifies only 300 new homes in total for Crowborough over its 24 year duration, which is less that its current level of need for affordable homes on their own. This would appear to be a fundamental flaw in the strategy and demonstrable proof that the Core Strategy under-provides new housing allocations for Crowborough. On the basis that new development will need to provide 35% affordable homes, Crowborough will need to have allocated a minimum of 872 new homes to deliver the level of affordable housing that is presently required. Clearly for future affordable provision to be yielded, the allocation figure would need to be significantly higher. 2 It is considered that the Core Strategy is unsound in that it cannot meet the future housing needs of market homes and affordable homes through the allocation proposed in Policy WCS2. To make the Core Strategy sound, it is considered that the housing allocation should be increased to a figure in the order of 900 new homes.

Details of Changes to be Made:
3 Land that is available and free of constraint is identified in the Council’s SHLAA as a suitable site for allocation and early release (site 095/1110). It can make a material contribution to the higher overall strategic allocation that is required by the town. Unlike many of the town’s potential peripheral sites, it is not within the AONB which is considered to be a material advantage.
Details of Reasons for Soundess/ Legal Complaince:

Policy WCS6 – Rural Area Strategy The main thrust of this Policy, as promoted, is to catalogue Wealden settlements by, apparently, population levels. The result will exclude those falling into ‘Neighbourhood Centres and Unclassified settlements’ and representing the major portion (some 57%) of Wealden District land area, from any meaningful residential housing policy. In categorising the various settlements in this way, the district Council ignores the contribution which contained residential development makes to sustaining vibrant rural village communities. In consequence, no less that 27 currently sustainable villages, as recognised in the out going Local Plan, are to be emasculated, preventing all further growth during the period to 2030. The well intentioned and avowed aim of protecting the countryside is acknowledged. However, the abdication of its responsibilities is not an option open to the District Council. The direct effect of Policy WSC6 will cause those villages which are to be given this doubtful protection to stagnate and decay into geriatric dormitories. If this Policy is adopted there can be no interaction for the moribund local communities it creates, through the intake of younger people. The District Council will cite proposed Policy WCS 9, )Rural exception affordable housing), as a source of local housing, in defending the path they have chosen to pursue. Experience has shown that ‘exception’ housing policies, as entombed in successive Adopted local plans and applied first through housing associations (HAs), then through registered social landlords (RSLs) and more recently, through approved landlords (ALs), have been an almost total failure. The problem is well recognised but never acknowledged by those with the discretion to do something about it. It is this. Any land suitable for ‘exception’ housing is equally suitable for private housing development. Consequently and with no more land being made available, landowners prefer to retain their holdings, rather than support exception housing, which gives a return of about 1% of what their land would be worth for equivalent private housing development. Land can only be built on once!

Details of Changes to be Made:

We consider the deleted development boundaries should be restored to the 27 villages the District Council seeks to emasculate in proposed Policy WCS6. We refer to Q4 above, and to the preamble in paragraph 5 of the 19th October document. The district Council sets out to achieve housing growth of 400 units per annum. It quotes that number of dwellings per annum for a plan period of 18 years, (2012 to 2030), producing some 7200 homes in total. In analysing the figures proffered in Policy WCS 2, (Distribution of Housing Growth 2006 – 2030), these amount to 8000 dwellings in total and include the commitments already in hand for the period 2006 to 2012. However, these earlier commitments are not confirmed by completions. Taking current national housing performance, completions will be well below commitments. The draft Core Strategy seeks to create an imbalance in favour of family housing in the south of the district. This proposed imbalance take nebulous account of realistic employment prospects for those families who are being ‘designed’ into the southern housing. This imbalance restricts numbers in the north, where there is some prospect of local employment, and in the villages where, were it allowed, there are realistic prospects that developments would actually take place. Directing family housing to the south will hardly assist the adjoining Eastbourne District, which is already an area of low employment. In practice, the District Council’s financial liabilities will be further extended. The draft Core Strategy, in further seeking to restrict residential development to ‘towns only’, creates fundamentally unsound policy. The result is likely to be a sluggish take up and completions which will fall short of the targets set. The high cost of implementing recent changes to building regulations, together with general infrastructure requirements, will further constrain housing development. A lack of local employment in the south will promote out commuting and by car on an antiquated road network, given the lack of alternative public transport. We propose that the probable shortfall in housing completions be computed and the result be evenly distributed between the villages being unfairly shorn of their development boundaries. This will off-set the debilitating effect draft Policy WCS6 will otherwise cause to the district, should it be adopted.
Details of Reasons for Soundness/ Legal Compliance:
The roads in the Crowborough area are appalling and the crossing which services three schools around my house now has to be moved dangerously near the mini round about outside the White Heart pub.

Details of Changes to be Made:
1. The description of Crowborough set out in paragraph 6.33 includes a number of comments that are either incorrect, or of questionable relevance. It is suggested that the number of people living in the town that also work in the town is low. However there is no indication as to what the Council think it should be. There can be no doubt that compared to Stone Cross and Westham, Willingdon and Polegate the proportion is actually much higher, and yet the strategy aims to locate far more housing in these settlements than Crowborough. There is no justification for this inconsistent approach.

2. The Council mentions that the railway station is some distance from the town centre. In practice however, the majority of residents of Crowborough do not live in the town centre, and a very large proportion of them live within easy walking distance of the railway station. The service is well used. By comparison, Hailsham, where much the largest housing allocations are proposed, does not have a railway service at all, as well as relatively limited bus links. The location of Crowborough’s railway station is no justification for suggesting that the town is less suited to new development.

3. The Council refers to out-commuting to Tunbridge Wells, East Grinstead aned Uckfield however there is no mention of the number of Crowborough residents that commute to London. It is not accepted that significant number of Crowborough residents commute to East Grinstead or Uckfield, however it is known that a very large number commute to London using the train service. This is a sustainable form of living and working which the Council has made no reference to.

4. The Council states that "the employment centres in town attract vehicles along unsuitable restricted residential roads". This is a wholly misleading over-generalisation. Not all existing employment sites are as inaccessible as suggested. The need for more employment in the town and the significant housing need that exists are clear and should be given significant weight. What should be taken into account is the stronger housing market that in the town compared to much of the rest of the district. The fact that it is close to Tunbridge Wells makes it a desirable place to live. This means that it can deliver housing at a higher and more consistent rate than many other parts of the District.

5. The Core Strategy is considered to be unsound on the basis that insufficient new homes are allocated for the town. This is demonstrated by reference to paragraph 6.33 which identifies a current need for 305 new affordable homes. The Core Strategy identifies only 300 new homes in total for Crowborough over its 24 year duration, which is less than its current level of need for affordable homes alone. This would appear to be a fundamental flaw in the strategy and demonstrable proof that the Core Strategy under-provides new housing allocations fro Crowborough.

6. On the basis that new development will need to provide 35% affordable homes, Crowborough will need to have allocated a minum of 872 new homes to deliver the level of affordable housing that is presently required. Clearly for future affordable provision to be yielded, the allocated figure would need to be significantly higher.

7. It is considered that the Core Strategy is unsound in that it cannot meet the future housing needs of market homes and affordable homes through the allocation proposed in Policy WCS2. Figure 10 identifies land for an urban extension to the south-east of the town. This land is not in the AONB, well away from the exclusion zone around the Ashdown Forest Special Protection Area, close to the station and close to existing employment area. In view of all of these factors, and the ability of Crowborough to deliver more houses within the plan period than many of the other settlements it is considered that there is no justification in restricting the number of new dwellings allocated for the town to just 300. The town could easily deliver 90 additional dwellings per year over the remainder of the plan period and the number allocated should be at least 900.

8. In this context, the residential provision identified as a contingency urban extension on land north of the A16 should be brought forward for development and not be dependent on progress on other sites. This land is available for development now, it is in a sustainable location and is deliverable. Although within the AONB it can be developed while at the same time preserving its main landscape features. Housing development will not be intrusive into the surrounding landscape and will appear as a logical contained extension to the built up area of the town. In order to illustrate these points two drawings have been appended. One shows the opportunities and contraint that effect the site, and the other is a simple masterplan of how the site might be developed for housing while preserving the tree lines and hedgerows which represent the key landscape features on the site. The site also provides the opportunity to make a direct contribution to the recreational facilities at the adjoining Goldsmiths Leisure Centre as part of any scheme.

Details of Changes to be Made:
At least 900 new dwellings should be provided at Crowborough (in addition to existing commitments etc.) Land North of the A26 should be identified for development immediately and not be a ‘contingency site’.

Summary of all Representations - Proposed Submission Core Strategy Regulation 27 - Report 11th July 2011

Details of Reasons for Soundness/ Legal Complaince:

1. The description of Crowborough set out in paragraph 6.33 includes a number of comments that are either incorrect, or of questionable relevance. It is suggested that the number of people living in the town that also work in the town is low. However there is no indication as to what the Council think it should be. There can be no doubt that compared to Stone Cross and Westham, Willingdon and Polegate the proportion is actually much higher, and yet the strategy aims to locate far more housing in these settlements than Crowborough. There is no justification for this inconsistent approach.

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4. The Council states that "the employment centres in town attract vehicles along unsuitable restricted residential roads". This is a wholly misleading over-generalisation. Not all existing employment sites are as inaccessible as suggested. The need for more employment in the town and the significant housing need that exists are clear and should be given significant weight. What should be taken into account is the stronger housing market that in the town compared to much of the rest of the district. The fact that it is close to Tunbridge Wells makes it a desirable place to live. This means that it can deliver housing at a higher and more consistent rate than many other parts of the District.

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8. In this context, the residential provision identified as a contingency urban extension on land north of the A16 should be brought forward for development and not be dependent on progress on other sites. This land is available for development now, it is in a sustainable location and is deliverable. Although within the AONB it can be developed while at the same time preserving its main landscape features. Housing development will not be intrusive into the surrounding landscape and will appear as a logical contained extension to the built up area of the town. In order to illustrate these points two drawings have been appended. One shows the opportunities and contraint that effect the site, and the other is a simple masterplan of how the site might be developed for housing while preserving the tree lines and hedgerows which represent the key landscape features on the site. The site also provides the opportunity to make a direct contribution to the reacreational facilities at the adjoining Goldsmiths Leisure Centre as part of any scheme.

Details of Changes to be Made:
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Representation ID
1174

Paragraph 6.33

Sound ☐ Yes ☐ No ☐ Justified ☐ Effective ☐ Consistent with national policy
Legally Compliant ☐ Yes ☐ No

Details of Reasons for Soundess/ Legal Compliance:

Details of Changes to be Made:
Details of Reasons for Soundness/ Legal Compliance:

The Core Strategy is considered to be unsound on the basis that insufficient new homes are allocated for the town. This is demonstrated by reference to paragraph 6.33 which identifies a current need for 305 new affordable homes. The Core Strategy identifies only 300 new homes in total for Crowborough over its 24-year duration, which is less than the current level of need for affordable homes on their own. This would appear to be a fundamental flaw in the strategy and demonstrable proof that the Core Strategy under-provides new housing allocations for Crowborough. On the basis that new development will need to provide 35% affordable homes, Crowborough will need to have allocated a minimum of 872 new homes to deliver the level of affordable housing that is presently required. Clearly for future affordable provision to be yielded, the allocated figure would need to be significantly higher. It is considered that the Core Strategy is unsound in that it cannot meet the future housing needs for market homes and affordable homes through the allocations proposed in Policy WCS2. To make the Core Strategy sound, it is considered that the housing allocation should be increased to a figure in the order of 900 new homes.

Details of Changes to be Made:

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**Details of Reasons for Soundness/ Legal Compliance:**

Crowborough Area Strategy (paragraphs 6.33 – 6.38: Policy WCS2, Figure 9) 1 The Core Strategy is considered to be unsound on the basis that insufficient new homes are allocated for the town. This is demonstrated by reference to paragraph 6.33 which identifies a current need for 305 new affordable homes. The Core Strategy identifies only 300 new homes in total for Crowborough over its 24 year duration, which is less that its current level of need for affordable homes on their own. This would appear to be a fundamental flaw in the strategy and demonstrable proof that the Core Strategy under-provides new housing allocations for Crowborough. On the basis that new development will need to provide 35% affordable homes, Crowborough will need to have allocated a minimum of 872 new homes to deliver the level of affordable housing that is presently required. Clearly for future affordable provision to be yielded, the allocation figure would need to be significantly higher. 2 It is considered that the Core Strategy is unsound in that it cannot meet the future housing needs of market homes and affordable homes through the allocation proposed in Policy WCS2. To make the Core Strategy sound, it is considered that the housing allocation should be increased to a figure in the order of 900 new homes.

**Details of Changes to be Made:**

3 Land that is available and free of constraint is identified in the Council’s SHLAA as a suitable site for allocation and early release (site 095/1110). It can make a material contribution to the higher overall strategic allocation that is required by the town. Unlike many of the town’s potential peripheral sites, it is not within the AONB which is considered to be a material advantage.
Paragraph 6.33

Details of Reasons for Soundness/ Legal Compliance:

1. The description of Crowborough set out in paragraph 6.33 includes a number of comments that are either incorrect, or of questionable relevance. It is suggested that the number of people living in the town that also work in the town is low, however there is no indication as to what the Council think it should be. There can be no doubt that compared to Stone Cross and Westham, Willingdon and Polegate the proportion is actually much higher, and yet the strategy aims to locate far more housing in these settlements than Crowborough. There is no justification for this inconsistent approach. 2. The Council mentions that the railway station is some distance from the town centre. In practice however, the majority of the residents of Crowborough do not live in the town centre, and a very large proportion of them live within easy walking distance of the railway station. The service is well-used. By comparison, Hailsham, where most the largest housing allocations are proposed, does not have a railway service at all, as well as relatively limited bus links. The location of Crowborough’s railway station is no justification for suggesting that the town is less suited to new development. 3. The Council refers to out-commuting to Tunbridge Wells, East Grinstead and Uckfield, however there is no mention of the number of Crowborough residents that commute into London. It is not accepted that significant number of Crowborough residents commute to East Grinstead or Uckfield, however it is known that a very large number commute to London, using the train service. This is a sustainable form of living and working which the Council has made no reference to. 4. The Council states that “the employment centres in the town attract vehicles along unsuitable restricted residential roads”. This is a wholly misleading over-generalisation. Not all existing employment sites are as inaccessible as suggested. 5. The need for more employment in the town, and the significant housing need that exists are clear and should be given significant weight. What should be taken into account is the stronger housing market that in the town compared to much of the rest of the district. The fact that it is close to Tunbridge Wells makes it a desirable place to live, as does the good train service into London, and the attractive landscape around the town. This means that it can deliver housing at a higher and more consistent rate than many other parts of the District. 6. The Core Strategy is considered to be unsound on the basis that insufficient new homes are allocated for the town. This is demonstrated by reference to paragraph 6.33 which identifies a current need for 304 new affordable homes. The Core Strategy identifies only 300 new homes in total for Crowborough over its 24 year duration, which is less than its current level of need for affordable homes alone. This would appear to be a fundamental flaw in the strategy and demonstrable proof that the Core Strategy under-provides new housing allocations for Crowborough. On the basis that new development will need to provide 35% affordable homes, Crowborough will need to have allocated a minimum of 872 new homes to deliver the level of affordable housing that is presently required. Clearly for future affordable provision to be yielded, the allocated figure would need to be significantly higher. 7. It is considered that the Core Strategy is unsound in that it cannot meet the future housing needs of market homes and affordable homes through the allocation proposed in Policy WCS2. Figure 10 identifies land for an urban extension to the south-east of the town. This land is not in the AONB, well away from the exclusion zone around the Ashdown Forest Special Protection Area, close to the station and close to existing employment area. In view of all of these factors, and the ability of Crowborough to deliver more houses within the plan period than many of the other settlements it is considered that there is no justification in restricting the number of new dwellings allocated for the town to just 300. The town could easily deliver 90 additional dwellings per year over the remainder of the plan period and the number allocated should be at least 900.

Details of Changes to be Made:

At least 900 new dwellings should be provided at Crowborough.
Details of Reasons for Soundness/ Legal Compliance:
The description of Crowborough in these paragraphs is unjustifiably negative. It understates its advantages, potential need for development and the capacity of its existing range of services and infrastructure, including rail connection.

Details of Changes to be Made:
Re-write these paragraphs with a greater emphasis upon the size and importance of Crowborough, its capacity to accommodate development without harm to the AONB or Ashdown Forest SPA and the need to provide new housing and employment to sustain its economic prosperity and make use of its existing infrastructure advantage.
The need for more employment in the town and the significant housing need that exists are clear and should be given of these factors, and the ability of Crowborough to deliver more houses within the plan period than many of the much of the rest of the district. The fact that it is close to Tunbridge Wells makes it a desirable place to live. This for future affordable provision to be yielded, the allocated figure would need to be significantly higher. 7. It is that “the employment centres in town attract vehicles along unsuitable restricted residential roads”. This is a Ashdown Forest Special Protection Area, close to the station and close to existing employment area. In view of all to the south-east of the town. This land is not in the AONB, well away from the exclusion zone around the affordable homes through the allocation proposed in Policy WCS2. Figure 10 identifies land for an urban extension strategy and demonstrable proof that the Core Strategy under-provides new housing allocations fro Crowborough. On the basis that new development will need to provide 35% affordable homes, Crowborough will need to have allocated a minum of 872 new homes to deliver the level of affordable housing that is presently required. Clearly for future affordable provision to be yielded, the allocated figure would need to be significantly higher. 7. It is considered that the Core Strategy is unsound in that it cannot meet the future housing needs of market homes and affordable homes through the allocation proposed in Policy WCS2. Figure 10 identifies land for an urban extension to the south-east of the town. This land is not in the AONB, well away from the exclusion zone around the Ashdown Forest Special Protection Area, close to the station and close to existing employment area. In view of all of these factors, and the ability of Crowborough to deliver more houses within the plan period than many of the other settlements it is considered that there is no justification in restricting the number of new dwellings allocated for the twon to just 300. The town could easily deliver 90 additional dwellings per year over the remainder of the plan period and the number allocated should be at least 900. 8. In this context, the residential provision identified as a contingency urban extension on land north of the A16 should be brought forward for development and not be dependent on progress on other sites. This land is available for development now, it is in a sustainable location and is deliverable. Although within the AONB it can be developed while at the same time preserving its main landscape features. Housing development will not be intrusive into the surrounding landscape and will appear as a logical contained extension to the built up area of the town. In order to illustrate these points two drawings have been appended. One shows the opportunities and constraint that effect the site, and the other is a simple masterplan of how the site might be developed for housing while preserving the tree lines and hedgerows which represent the key landscape features on the site. The site also provides the opportunity to make a direct contribution to the reacreational facilities at the adjoining Goldsmiths Leisure Centre as part of any scheme.

Details of Changes to be Made:
At least 900 new dwellings should be provided at Crowborough (in addition to existing commitments etc.) Land North of the A26 should be identified for development immediately and not be a ‘contingency site’.
Paragraph 6.34

Details of Reasons for Soundess/ Legal Complaince:

The Core Strategy is considered to be unsound on the basis that insufficient new homes are allocated for the town. This is demonstrated by reference to paragraph 6.33 which identifies a current need for 305 new affordable homes. The Core Strategy identifies only 300 new homes in total for Crowborough over its 24-year duration, which is less than the current level of need for affordable homes on their own. This would appear to be a fundamental flaw in the strategy and demonstrable proof that the Core Strategy under-provides new housing allocations for Crowborough. On the basis that new development will need to provide 35% affordable homes, Crowborough will need to have allocated a minimum of 872 new homes to deliver the level of affordable housing that is presently required. Clearly for future affordable provision to be yielded, the allocated figure would need to be significantly higher. It is considered that the Core Strategy is unsound in that it cannot meet the future housing needs for market homes and affordable homes through the allocations proposed in Policy WCS2. To make the Core Strategy sound, it is considered that the housing allocation should be increased to a figure in the order of 900 new homes. The description of Crowborough set out in paragraph 6.33 includes a number of comments that are either incorrect, or of questionable relevance. It is suggested that the number of people living in the town that also work in the town is low, however there is no indication as to what the Council think it should be. There can be no doubt that compared to Stone Cross and Westham, Willingdon and Polegate the proportion is much higher, and yet the strategy aims to locate far more housing in these settlements than Crowborough. There is no justification for this inconsistent approach. The Council mentions that the railway station is some distance from the town centre. The residents of Crowborough do not all live in the town centre, and a very large proportion of them live within easy walking distance of the railway station. The service is very well used. Hailsham, where the largest housing allocations are proposed, does not have a railway service at all, as well as relatively limited bus links. The location of Crowborough's railway station is no justification for suggesting that the town is less suited to new development. The Council refers to out-commuting to Tunbridge Wells, East Grinstead and Uckfield, however there is no mention of the number of Crowborough residents that commute into London. It is not accepted that a significant number of Crowborough residents commute to East Grinstead or Uckfield, however it is known that a very large number commute to London, using the train service. This is a sustainable form of living and working which the Council has made no reference to. The employment centres in the town attract vehicles along unsuitable restricted residential roads". This is a wholly misleading over-generalisation. Not all existing employment sites are as inaccessible as suggested. The need for more employment in the town, and the significant housing need that exists are clear and should be given significant weight. What should be taken into account is the stronger housing market in the town compared to much of the rest of the district. The fact that it is close to Tunbridge Wells makes it a desirable place to live, as does the good train service into London, and the attractive landscape around the town. This means that it can deliver housing at a higher and more consistent rate than many other parts of the District.

Details of Changes to be Made:

Figure 9 identifies land for an urban extension to the south east of the town, and for residential development at Jarvis Brook. None of this land is within the AONB, it is well away from the exclusion zone around the Ashdown Forest Special protection Area, and is close to the railway station and existing employment areas. In view of all of these factors, and the ability of Crowborough to deliver more houses within the plan period than many of the other settlements it is considered that there is no justification in restricting the number of new dwellings allocated for the town to just 300. The town could easily deliver 90 additional dwellings per year over the remainder of the plan period and the number allocated should be at least 900.
Details of Reasons for Soundess/ Legal Compliance:

Officers at Mid Sussex District Council are continuing to work jointly with Wealden in developing and implementing a strategic and co-ordinated approach to protecting the Ashdown Forest SAC/SPA. Work already undertaken between the two Councils has identified a series of measures to limit the impact of new development on the conservation interests of the Ashdown Forest. These measures include new development contributing to an appropriate level of mitigation in the form of providing Suitable Alternative Natural Green Space (SANGS) and support via developer contributions towards the Ashdown Forest Access Management Strategy. This strategy will need to specify measures for the management of visitors to Ashdown Forest in such a way that reduces their impact on the interest features of the designated site and will need be prepared and implemented in association with the conservators of Ashdown Forest, Natural England and other partners. In addition, further joint working will be required to develop and implement on site management measures to reduce nitrogen emissions emanating from the increased number of vehicles using the roads crossing Ashdown Forest. In combination with this, both Councils through their Local Development Frameworks will also need to delivery initiatives to reduce reliance on the motor vehicle, through creating sustainable communities, providing improvements to public transport, cycling and walking facilities. Pollution monitoring on the Forest will be required to assess the effectiveness of these measures. The recognition of this situation in paragraphs 3.22 6.34 and policy SPO1 is welcomed. The recognition within the Core Strategy of the impact on the Ashdown Forest that development within rural villages (such as Forest Road and Danehill) would have is welcomed. The strategy focussing growth at Uckfield, Crowborough, Heathfield and Hailsham and smaller- scale growth at villages within the Wealden District will go some way to minimising the negative impact development would have on the Ashdown Forest, especially in combination with further mitigation measures (such as SANGS).

Details of Changes to be Made:
Summary of all Representations - Proposed Submission Core Strategy Regulation 27 - Report 11th July 2011

Representation ID
1473

Person ID Mr Nightingale
332748

Millwood Designer Homes

Agent ID Mr Nightingale
102571

Kember Loudon Williams

Paragraph 6.34

Sound  □ Yes □ No  ✓ Justified  ✓ Effective  □ Consistent with national policy

Legally Compliant □ Yes □ No

Details of Reasons for Soundess/ Legal Complaince:

1. The description of Crowborough set out in paragraph 6.33 includes a number of comments that are either incorrect, or of questionable relevance. It is suggested that the number of people living in the town that also work in the town is low, however there is no indication as to what the Council think it should be. There can be no doubt that compared to Stone Cross and Westham, Willingdon and Polegate the proportion is actually much higher, and yet the strategy aims to locate far more housing in these settlements than Crowborough. There is no justification for this inconsistent approach. 2. The Council mentions that the railway station is some distance from the town centre. In practice however, the majority of the residents of Crowborough do not live in the town centre, and a very large proportion of them live within easy walking distance of the railway station. The service is well-used. By comparison, Hailsham, where must the largest housing allocations are proposed, does not have a railway service at all, as well as relatively limited bus links. The location of Crowborough’s railway station is no justification for suggesting that the town is less suited to new development. 3. The Council refers to out-commuting to Tunbridge Wells, East Grinstead and Uckfield, however there is no mention of the number of Crowborough residents that commute into London. it is not accepted that significant number of Crowborough residents commute to East Grinstead or Uckfield, however it is known that a very large number commute to London, using the train service. This is a sustainable form of living and working which the Council has made no reference to. 4. The Council states that “the employment centres in the town attract vehicles along unsuitable restricted residential roads”. This is a wholly misleading over-generalisation. Not all existing employment sites are as inaccessible as suggested. 5. The need for more employment in the town, and the significant housing need that exists are clear and should be given significant weight. What should be taken into account is the stronger housing market that in the town compared to much of the rest of the district. The fact that it is close to Tunbridge Wells makes it a desirable place to live, as does the good train service into London, and the attractive landscape around the town. This means that it can deliver housing at a higher and more consistent rate than many other parts of the District. 6. The Core Strategy is considered to be unsound on the basis that insufficient new homes are allocated for the town. This is demonstrated by reference to paragraph 6.33 which identifies a current need for 304 new affordable homes. The Core Strategy identifies only 300 new homes in total for Crowborough over its 24 year duration, which is less than its current level of need for affordable homes alone. This would appear to be a fundamental flaw in the strategy and demonstrable proof that the Core Strategy under-provides new housing allocations for Crowborough. On the basis that new development will need to provide 35% affordable homes, Crowborough will need to have allocated a minimum of 872 new homes to deliver the level of affordable housing that is presently required. Clearly for future affordable provision to be yielded, the allocated figure would need to be significantly higher. 7. It is considered that the Core Strategy is unsound in that it cannot meet the future housing needs of market homes and affordable homes through the allocation proposed in Policy WCS2. Figure 10 identifies land for an urban extension to the south-east of the town. This land is not in the AONB, well away from the exclusion zone around the Ashdown Forest Special Protection Area, close to the station and close to existing employment area. In view of all of these factors, and the ability of Crowborough to deliver more houses within the plan period than many of the other settlements it is considered that there is no justification in restricting the number of new dwellings allocated for the town to just 300. The town could easily deliver 90 additional dwellings per year over the remainder of the plan period and the number allocated should be at least 900.

Details of Changes to be Made:
At least 900 new dwellings should be provided at Crowborough.
### Details of Reasons for Soundess/ Legal Complaince:

Crowborough Area Strategy (paragraphs 6.33 – 6.38: Policy WCS2, Figure 9) 1 The Core Strategy is considered to be unsound on the basis that insufficient new homes are allocated for the town. This is demonstrated by reference to paragraph 6.33 which identifies a current need for 305 new affordable homes. The Core Strategy identifies only 300 new homes in total for Crowborough over its 24 year duration, which is less that its current level of need for affordable homes on their own. This would appear to be a fundamental flaw in the strategy and demonstrable proof that the Core Strategy under-provides new housing allocations for Crowborough. On the basis that new development will need to provide 35% affordable homes, Crowborough will need to have allocated a minimum of 872 new homes to deliver the level of affordable housing that is presently required. Clearly for future affordable provision to be yielded, the allocation figure would need to be significantly higher. 2 It is considered that the Core Strategy is unsound in that it cannot meet the future housing needs of market homes and affordable homes through the allocation proposed in Policy WCS2. To make the Core Strategy sound, it is considered that the housing allocation should be increased to a figure in the order of 900 new homes.

### Details of Changes to be Made:

3 Land that is available and free of constraint is identified in the Council’s SHLAA as a suitable site for allocation and early release (site 095/1110). It can make a material contribution to the higher overall strategic allocation that is required by the town. Unlike many of the town's potential peripheral sites, it is not within the AONB which is considered to be a material advantage.
Paragraph 6.35 to 6.36 – The main concern is that the strategy seeks to emphasise the role of the Pine Grove site for housing as opposed to its retention for employment uses. This is considered contrary to PPS4, PPG13 and results in an ineffective strategy. The solution is to identify more housing to the south and southeast of Crowborough and reinforce the Pine Grove site as being suitable for predominantly employment type uses. The Pine Grove site referred to in this paragraph is considered an important employment area in a highly sustainable location. The reference in the paragraph to ‘no decision being taken on the future use of this site’ means that the strategy is ineffective – it is surely the purpose of the Core Strategy to help direct development to suitable locations. This aside, identifying the site under paragraph 6.36 for high density housing would not be the most effective/appropriate strategy and would be contrary to PPS4, PPG13 and employment protection policies. Whilst some housing may be appropriate, the site should principally be retained for employment type uses. Its retention for mainly employment purposes would help maintain a balanced town centre economy. Its loss to housing would mean that the vitality of the town centre is wholly dependent on retail. This would not maintain a sustainable town centre. A more appropriate and effective strategy will be to identify Pine Grove for mainly employment uses and to reinforce housing to the south and southeast of the town. The south east of Crowborough, along Tubwell Lane, comprises a mixed area of detached houses, nursery land and nursery buildings. To the south of Tubwell Lane in particular is a cul de sac of houses, a manor house and a variety of other buildings. Although located within the AONB, closer inspection of the landscape quality indicates that this area is not as attractive as areas further to the south and so could be identified within the southeast quadrant of housing growth identified in the Core Strategy. The area of Tubwell Lane referred to here is considered to be contiguous with the built up area and would provide scope for growth and a better defined boundary to the AONB. This approach will require some changes to paragraph 6.35 to 6.36 to give more certainty to the Pine Grove site for employment uses, and to compensate for the reduced housing by amending the Key Diagram and paragraph 6.38.

Details of Changes to be Made:
Change 6.35 The Council currently locates one of its offices at a central strategically located site at Pine Grove, shared with the County Library Service. A decision has been made to transfer staff to its Hailsham campus. This is likely to take place within the first five years of the plan. The Pine Grove site should principally be used for employment type uses in the B1 category with only a small proportion for residential uses. Such a strategy would ensure that the centre maintains vitality and viability but also would be compliant with National Policies. No other suitable employment land has been identified within the Crowborough area and so its use for principally employment type uses is very important.
6. The need for more employment in the town and the significant housing need that exists are clear and should be given much weight. What should be taken into account is the stronger housing market that in the town compared to much of the rest of the district. The fact that it is close to Tunbridge Wells makes it a desirable place to live. This is a sustainable form of living and working which the Council has made no reference to. 4. The Council states "the employment centres in town attract vehicles along unsuitable restricted residential roads". This is a wholly misleading over-generalisation. Not all existing employment sites are as inaccessible as suggested. 5. The need for more employment in the town and the significant housing need that exists are clear and should be given significant weight. What should be taken into account is the stronger housing market that in the town compared to much of the rest of the district. The fact that it is close to Tunbridge Wells makes it a desirable place to live. This means that it can deliver housing at a higher and more consistent rate than many other parts of the District. 6. The Core Strategy is considered to be unsound on the basis that insufficient new homes are allocated for the town. This is demonstrated by reference to paragraph 6.33 which identifies a current need for 305 new affordable homes. The Core Strategy identifies only 300 new homes in total for Crowborough over its 24 year duration, which is less than its current level of need for affordable homes alone. This would appear to be a fundamental flaw in the strategy and demonstrable proof that the Core Strategy under-provides new housing allocations from Crowborough. On the basis that new development will need to provide 35% affordable homes, Crowborough will need to have allocated a minimum of 872 new homes to deliver the level of affordable housing that is presently required. Clearly for future affordable provision to be yielded, the allocated figure would need to be significantly higher. 7. It is considered that the Core Strategy is unsound in that it cannot meet the future housing needs of market homes and affordable homes through the allocation proposed in Policy WCS2. Figure 10 identifies land for an urban extension to the south-east of the town. This land is not in the AONB, well away from the exclusion zone around the Ashdown Forest Special Protection Area, close to the station and close to existing employment area. In view of all of these factors, and the ability of Crowborough to deliver more houses within the plan period than many of the other settlements it is considered that there is no justification in restricting the number of new dwellings allocated for the town to just 300. The town could easily deliver 90 additional dwellings per year over the remainder of the plan period and the number allocated should be at least 900. 8. In this context, the residential provision identified as a contingency urban extension on land north of the A16 should be brought forward for development and not be dependent on progress on other sites. This land is available for development now, it is in a sustainable location and is deliverable. Although within the AONB it can be developed while at the same time preserving its main landscape features. Housing development will not be intrusive into the surrounding landscape and will appear as a logical contained extension to the built up area of the town. In order to illustrate these points two drawings have been appended. One shows the opportunities and constraint that effect the site, and the other is a simple masterplan of how the site might be developed for housing while preserving the tree lines and hedgerows which represent the key landscape features on the site. The site also provides the opportunity to make a direct contribution to the reacreational facilities at the adjoining Goldsmiths Leisure Centre as part of any scheme.

Details of Changes to be Made:
At least 900 new dwellings should be provided at Crowborough (in addition to existing commitments etc.) Land North of the A26 should be identified for development immediately and not be a ‘contingency site’.
Paragraph 6.35

Details of Reasons for Soundess/ Legal Complaince:
Contrary to the statement at the end of Para 6.35 we contend that the site owned by Servomex, West of Palesgate Lane, (plan attached edged red) is suitable for employment use and that Wealden DC have failed to assess it sufficiently for this use.

Details of Changes to be Made:
A full assessment of the subject site for employment use should be undertaken by Wealden DC to ensure the soundness of its allocation of employment sites. Paragraph 6.35 of the Porposed Submission Core Strategy states that "no other suitable employment land has been identified within the Crowborough Area". In the event that the Servomex site is not allocated for housing I would propose that it is suitable for employment use as an extension of the Millbrook Industrial Estate. The attached extract from the 2008 Employment Land Review would appear to support this view. Such use would also be in accordance with the employment and sustainability policies in paras 2.7, 3.18 and 3.22 of the PSCS.
Details of Reasons for Soundess/ Legal Complaince:
The Core Strategy is considered to be unsound on the basis that insufficient new homes are allocated for the
town. This is demonstrated by reference to paragraph 6.33 which identifies a current need for 305 new affordable
homes. The Core Strategy identifies only 300 new homes in total for Crowborough over its 24-year duration, which
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that compared to Stone Cross and Westham, Willingdon and Polegate the proportion is much higher, and yet the
strategy aims to locate far more housing in these settlements than Crowborough. there is no justification for this
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residents of Crowborough do not all live in the town centre, and a very large proportion of them live within easy
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significant housing need that exists are clear and should be given significant weight. What should be taken into
account is the stronger housing market in the town compared to much of the rest of the district. The fact that it is
close to Tunbridge Wells makes it a desirable place to live, as does the good train service into London, and the
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Figure 9 identifies land for an urban extension to the south east of the town, and for residential development at
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Summary of all Representations - Proposed Submission Core Strategy Regulation 27 - Report 11th July 2011

Representation ID 1474

Person ID 332748  Mr Nightingale  Millwood Designer Homes
Agent ID 102571  Mr Nightingale  Kember Loudon Williams

Paragraph 6.35

Sound ☑ No ☑ Justified ☑ Effective ☐ Consistent with national policy
Legally Compliant ☑ Yes ☐ No

Details of Reasons for Soundess/ Legal Complaince:

1. The description of Crowborough set out in paragraph 6.33 includes a number of comments that are either incorrect, or of questionable relevance. It is suggested that the number of people living in the town that also work in the town is low, however there is no indication as to what the Council think it should be. There can be no doubt that compared to Stone Cross and Westham, Willingdon and Polegate the proportion is actually much higher, and yet the strategy aims to locate far more housing in these settlements than Crowborough. There is no justification for this inconsistent approach.

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4. The Council states that “the employment centres in the town attract vehicles along unsuitable restricted residential roads”. This is a wholly misleading over-generalisation. Not all existing employment sites are as inaccessible as suggested. The need for more employment in the town, and the significant housing need that exists are clear and should be given significant weight. What should be taken into account is the stronger housing market that is in the town compared to much of the rest of the district. The fact that it is close to Tunbridge Wells makes it a desirable place to live, as does the good train service into London, and the attractive landscape around the town. This means that it can deliver housing at a higher and more consistent rate than many other parts of the District.

5. The Core Strategy is considered to be unsound on the basis that insufficient new homes are allocated for the town. This is demonstrated by reference to paragraph 6.33 which identifies a current need for 304 new affordable homes. The Core Strategy identifies only 300 new homes in total for Crowborough over its 24 year duration, which is less than its current level of need for affordable homes alone. This would appear to be a fundamental flaw in the strategy and demonstrable proof that the Core Strategy under-provides new housing allocations for Crowborough. On the basis that new development will need to provide 35% affordable homes, Crowborough will need to have allocated a minimum of 872 new homes to deliver the level of affordable housing that is presently required. Clearly for future affordable provision to be yielded, the allocated figure would need to be significantly higher.

6. It is considered that the Core Strategy is unsound in that it cannot meet the future housing needs of market homes and affordable homes through the allocation proposed in Policy WCS2. Figure 10 identifies land for an urban extension to the south-east of the town. This land is not in the AONB, well away from the exclusion zone around the Ashdown Forest Special Protection Area, close to the station and close to existing employment area. In view of all of these factors, and the ability of Crowborough to deliver more houses within the plan period than many of the other settlements it is considered that there is no justification in restricting the number of new dwellings allocated for the town to just 300. The town could easily deliver 90 additional dwellings per year over the remainder of the plan period and the number allocated should be at least 900.

Details of Changes to be Made:

At least 900 new dwellings should be provided at Crowborough.
Details of Reasons for Soundess/ Legal Complaince:
The Pine Grove site is not identified for employment uses. The wording of this paragraph needs to make this clear. The lack of any clear future use and timescale of the future of this important, centrally located site is unsatisfactory.

Details of Changes to be Made:
The Plan needs to include a clear Statement of the Council's intentions for the Pine Grove site and the timescale involved. Also the method of addressing the loss of jobs from the Council's relocation needs to be clear.

Details of Reasons for Soundess/ Legal Complaince:
Contrary to the statement at the end of Para 6.35 we contend that the site owned by Servomex, West of Palesgate lane, (Plan attached, Edged Red) is suitable for employment use and that Wealden DC have failed to assess if sufficiently for this use.

Details of Changes to be Made:
A full assessment of the subject site for employment use should be undertaken by Wealden DC to ensure the soundness of its allocation of employment sites.
Paragraph 6.35 to 6.36 – The main concern is that the strategy seeks to emphasise the role of the Pine Grove site for housing as opposed to its retention for employment uses. This is considered contrary to PPS4, PPG13 and results in an ineffective strategy. The solution is to identify more housing to the south and southeast of Crowborough and reinforce the Pine Grove site as being suitable for predominantly employment type uses. The Pine Grove site referred to in this paragraph is considered an important employment area in a highly sustainable location. The reference in the paragraph to ‘no decision being taken on the future use of this site’ means that the strategy is ineffective – it is surely the purpose of the Core Strategy to help direct development to suitable locations. This aside, identifying the site under paragraph 6.36 for high density housing would not be the most effective/appropriate strategy and would be contrary to PPS4, PPG13 and employment protection policies. Whilst some housing may be appropriate, the site should principally be retained for employment type uses. Its retention for mainly employment purposes would help maintain a balanced town centre economy. Its loss to housing would mean that the vitality of the town centre is wholly dependent on retail. This would not maintain a sustainable town centre. A more appropriate and effective strategy will be to identify Pine Grove for mainly employment uses and to reinforce housing to the south and south east of the town. The south east of Crowborough, along Tubwell Lane, comprises a mixed area of detached houses, nursery land and nursery buildings. To the south of Tubwell Lane in particular is a cul de sac of houses, a manor house and a variety of other buildings. Although located within the AONB, closer inspection of the landscape quality indicates that this area is not as attractive as areas further to the south and so could be identified within the southeast quadrant of housing growth identified in the Core Strategy. The area of Tubwell Lane referred to here is considered to be contiguous with the built up area and would provide scope for growth and a better defined boundary to the AONB. This approach will require some changes to paragraph 6.35 to 6.36 to give more certainty to the Pine Grove site for employment uses, and to compensate for the reduced housing by amending the Key Diagram and paragraph 6.38.

Details of Changes to be Made:
6.36 The SHLAA revealed a range of potential housing sites around the town but many of these are within the AONB, or are at locations which did not perform well at Sustainability Appraisal. That said, the Council has identified an area to the south and east of the town suitable for Greenfield housing development. In addition, areas south of Western Road along Tubwell Lane which, although in the AONB are characterized by existing housing development, should be considered as part of the urban extension area identified under SD10. It is recognised that development in this area could potentially add to traffic and congestion problems on the local road network and will need to be subject to a full transport assessment. A reserve location for housing, which performed well in Sustainability Appraisal, is to the north and west of the A26, although this area is within the AONB and detailed landscape and need assessments would be required.
1. The description of Crowborough set out in paragraph 6.33 includes a number of comments that are either incorrect, or of questionable relevance. It is suggested that the number of people living in the town that also work in the town is low. However there is no indication as to what the Council think it should be. There can be no doubt that compared to Stone Cross and Westham, Willingdon and Polegate the proportion is actually much higher, and yet the strategy aims to locate far more housing in these settlements than Crowborough. There is no justification for this inconsistent approach. 2. The Council mentions that the railway station is some distance from the town centre. In practice however, the majority of residents of Crowborough do not live in the town centre, and a very large proportion of them live within easy walking distance of the railway station. The service is well used. By comparison, Hailsham, where much the largest housing allocations are proposed, does not have a railway service at all, as well as realltively limited bus links. The location of Crowborough's railway station is no justification for suggesting that the town is less suited to new development. 3. The Council refers to out-commuting to Tunbridge Wells, East Grinstead aned Uckfield however there is no mention of the number of Crowborough residents that commute into London. It is not accepted that significant number of Crowborough residents commute to East Grinstead or Uckfield, however it is known that a very large number commute to London using the train service. This is a sustainable form of living and working which the Council has made no reference to. 4. The Council states that "the employment centres in town attract vehicles along unsuitable restricted residential roads". This is a wholly misleading over-generalisation. Not all existing employment sites are as inaccessible as suggested. 5. The need for more employment in the town and the significant housing need that exists are clear and should be given significant weight. What should be taken into account is the stronger housing market that in the town compared to much of the rest of the district. The fact that it is close to Tunbridge Wells makes it a desirable place to live. This means that it can deliver housing at a higher and more consistent rate than many other parts of the District. 6. The Core Strategy is considered to be unsound on the basis that insufficient new homes are allocated for the town. This is demonstrated by reference to paragraph 6.33 which identifies a current need for 305 new affordable homes. The Core Strategy identifies only 300 new homes in total for Crowborough over its 24 year duration, which is less than its current level of need for affordable homes alone. 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In order to illustrate these points two drawings have been appended. One shows the opportunities and constraint that effect the site, and the other is a simple masterplan of how the site might be developed for housing while preserving the tree lines and hedgerows which represent the key landscape features on the site. The site also provides the opportunity to make a direct contribution to the reacreational facilities at the adjoining Goldmsiths Leisure Centre as part of any scheme.

**Details of Changes to be Made:**
At least 900 new dwellings should be provided at Crowborough (in addition to existing commitments etc.) Land North of the A26 should be identified for development immediately and not be a ‘contingency site’.
Details of Reasons for Soundness/ Legal Complaince:
The Core Strategy is considered to be unsound on the basis that insufficient new homes are allocated for the town. This is demonstrated by reference to paragraph 6.33 which identifies a current need for 305 new affordable homes. The Core Strategy identifies only 300 new homes in total for Crowborough over its 24-year duration, which is less than the current level of need for affordable homes on their own. This would appear to be a fundamental flaw in the strategy and demonstrable proof that the Core Strategy under-provides new housing allocations for Crowborough. On the basis that new development will need to provide 35% affordable homes, Crowborough will need to have allocated a minimum of 872 new homes to deliver the level of affordable housing that is presently required. Clearly for future affordable provision to be yielded, the allocated figure would need to be significantly higher. It is considered that the Core Strategy is unsound in that it cannot meet the future housing needs for market homes and affordable homes through the allocations proposed in Policy WCS2. To make the Core Strategy sound, it is considered that the housing allocation should be increased to a figure in the order of 900 new homes. The description of Crowborough set out in paragraph 6.33 includes a number of comments that are either incorrect, or of questionable relevance. It is suggested that the number of people living in the town that also work in the town is low, however there is no indication as to what the Council think it should be. There can be no doubt that compared to Stone Cross and Westham, Willingdon and Polegate the proportion is much higher, and yet the strategy aims to locate far more housing in these settlements than Crowborough. There is no justification for this inconsistent approach. The Council mentions that the railway station is some distance from the town centre. The residents of Crowborough do not all live in the town centre, and a very large proportion of them live within easy walking distance of the railway station. The service is very well used. Hailsham, where the largest housing allocations are proposed, does not have a railway service at all, as well as relatively limited bus links. The location of Crowborough's railway station is no justification for suggesting that the town is less suited to new development. The Council refers to out-commuting to Tunbridge Wells, East Grinstead and Uckfield, however there is no mention of the number of Crowborough residents that commute into London. It is not accepted that a significant number of Crowborough residents commute to East Grinstead or Uckfield, however it is known that a very large number commute to London, using the train service. This is a sustainable form of living and working which the Council has made no reference to. The Council states the “the employment centres in the town attract vehicles along unsuitable restricted residential roads”. This is a wholly misleading over-generalisation. Not all existing employment sites are as inaccessible as suggested. The need for more employment in the town, and the significant housing need that exists are clear and should be given significant weight. What should be taken into account is the stronger housing market in the town compared to much of the rest of the district. The fact that it is close to Tunbridge Wells makes it a desirable place to live, as does the good train service into London, and the attractive landscape around the town. This means that it can deliver housing at a higher and more consistent rate than many other parts of the District.

Details of Changes to be Made:
Figure 9 identifies land for an urban extension to the south east of the town, and for residential development at Jarvis Brook. None of this land is within the AONB, it is well away from the exclusion zone around the Ashdown Forest Special protection Area, and is close to the railway station and existing employment areas. In view of all of these factors, and the ability of Crowborough to deliver more houses within the plan period than many of the other settlements it is considered that there is no justification in restricting the number of new dwellings allocated for the town to just 300. The town could easily deliver 90 additional dwellings per year over the remainder of the plan period and the number allocated should be at least 900.
Paragraph 6.36

Details of Reasons for Soundess/ Legal Complaince:

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2. The Council mentions that the railway station is some distance from the town centre. In practice however, the majority of the residents of Crowborough do not live in the town centre, and a very large proportion of them live within easy walking distance of the railway station. The service is well-used. By comparison, Hailsham, where most the largest housing allocations are proposed, does not have a railway service at all, as well as relatively limited bus links. The location of Crowborough’s railway station is no justification for suggesting that the town is less suited to new development.

3. The Council refers to out-commuting to Tunbridge Wells, East Grinstead and Uckfield, however there is no mention of the number of Crowborough residents that commute into London. It is not accepted that significant number of Crowborough residents commute to East Grinstead or Uckfield, however it is known that a very large number commute to London, using the train service. This is a sustainable form of living and working which the Council has made no reference to.

4. The Council states that “the employment centres in the town attract vehicles along unsuitable restricted residential roads”. This is a wholly misleading over-generalisation. Not all existing employment sites are as inaccessible as suggested.

5. The need for more employment in the town, and the significant housing need that exists are clear and should be given significant weight. What should be taken into account is the stronger housing market that in the town compared to much of the rest of the district. The fact that it is close to Tunbridge Wells makes it a desirable place to live, as does the good train service into London, and the attractive landscape around the town. This means that it can deliver housing at a higher and more consistent rate than many other parts of the District.

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7. It is considered that the Core Strategy is unsound in that it cannot meet the future housing needs of market homes and affordable homes through the allocation proposed in Policy WCS2. Figure 10 identifies land for an urban extension to the south-east of the town. This land is not in the AONB, well away from the exclusion zone around the Ashdown Forest Special Protection Area, close to the station and close to existing employment area. In view of all of these factors, and the ability of Crowborough to deliver more houses within the plan period than many of the other settlements it is considered that there is no justification in restricting the number of new dwellings allocated for the town to just 300. The town could easily deliver 90 additional dwellings per year over the remainder of the plan period and the number allocated should be at least 900.

Details of Changes to be Made:

At least 900 new dwellings should be provided at Crowborough.
Paragraph 6.36

Details of Reasons for Soundness/ Legal Compliance:
Crowborough Area Strategy (paragraphs 6.33 – 6.38: Policy WCS2, Figure 9) 1 The Core Strategy is considered to be unsound on the basis that insufficient new homes are allocated for the town. This is demonstrated by reference to paragraph 6.33 which identifies a current need for 305 new affordable homes. The Core Strategy identifies only 300 new homes in total for Crowborough over its 24 year duration, which is less that its current level of need for affordable homes on their own. This would appear to be a fundamental flaw in the strategy and demonstrable proof that the Core Strategy under-provides new housing allocations for Crowborough. On the basis that new development will need to provide 35% affordable homes, Crowborough will need to have allocated a minimum of 872 new homes to deliver the level of affordable housing that is presently required. Clearly for future affordable provision to be yielded, the allocation figure would need to be significantly higher. 2 It is considered that the Core Strategy is unsound in that it cannot meet the future housing needs of market homes and affordable homes through the allocation proposed in Policy WCS2. To make the Core Strategy sound, it is considered that the housing allocation should be increased to a figure in the order of 900 new homes.

Details of Changes to be Made:
3 Land that is available and free of constraint is identified in the Council’s SHLAA as a suitable site for allocation and early release (site 095/1110). It can make a material contribution to the higher overall strategic allocation that is required by the town. Unlike many of the town’s potential peripheral sites, it is not within the AONB which is considered to be a material advantage.

Paragraph 6.36

Details of Reasons for Soundness/ Legal Compliance:
The reference to the Council’s Pine Grove site being suitable for housing and a mis of other appropriate uses is misleading. Only housing is definitely identified by the CS policies. A clear statement of the proposed uses for this important site is required and it should be primarily compensatory employment. The suitability of the highway network system to the south of the town to accommodate at least a further 300 dwellings has recently been confirmed by East Sussex County Council

Details of Changes to be Made:
Clarify proposals for the Pine Grove site, including compensatory provision of jobs. Remove or qualify any references to the highway network to the south of the town being a constraint to development.
### Details of Reasons for Soundess/ Legal Complaince:

1. The description of Crowborough set out in paragraph 6.33 includes a number of comments that are either incorrect, or of questionable relevance. It is suggested that the number of people living in the town that also work in the town is low. However there is no indication as to what the Council think it should be. There can be no doubt that compared to Stone Cross and Westham, Willingdon and Polegate the proportion is actually much higher, and yet the strategy aims to locate far more housing in these settlements than Crowborough. There is no justification for this inconsistent approach. 2. The Council mentions that the railway station is some distance from the town centre. In practice however, the majority of residents of Crowborough do not live in the town centre, and a very large proportion of them live within easy walking distance of the railway station. The service is well used. 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Not all existing employment sites are as inaccessible as suggested. 5. The need for more employment in the town and the significant housing need that exists are clear and should be given significant weight. What should be taken into account is the stronger housing market that in the town compared to much of the rest of the district. The fact that it is close to Tunbridge Wells makes it a desirable place to live. This means that it can deliver housing at a higher and more consistent rate than many other parts of the District. 6. The Core Strategy is considered to be unsound on the basis that insufficient new homes are allocated for the town. This is demonstrated by reference to paragraph 6.33 which identifies a current need for 305 new affordable homes. The Core Strategy identifies only 300 new homes in total for Crowborough over its 24 year duration, which is less than its current level of need for affordable homes alone. 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In order to illustrate these points two drawings have been appended. One shows the opportunities and constraint that effect the site, and the other is a simple masterplan of how the site might be developed for housing while preserving the tree lines and hedgerows which represent the key landscape features on the site. The site also provides the opportunity to make a direct contribution to the reacreational facilities at the adjoining Goldsmiths Leisure Centre as part of any scheme.

### Details of Changes to be Made:

At least 900 new dwellings should be provided at Crowborough (in addition to existing commitments etc.) Land North of the A26 should be identified for development immediately and not be a 'contingency site'.
Details of Reasons for Soundess/ Legal Complaince:
The Core Strategy is considered to be unsound on the basis that insufficient new homes are allocated for the town. This is demonstrated by reference to paragraph 6.33 which identifies a current need for 305 new affordable homes. The Core Strategy identifies only 300 new homes in total for Crowborough over its 24-year duration, which is less than the current level of need for affordable homes on their own. This would appear to be a fundamental flaw in the strategy and demonstrable proof that the Core Strategy under-provides new housing allocations for Crowborough. On the basis that new development will need to provide 35% affordable homes, Crowborough will need to have allocated a minimum of 872 new homes to deliver the level of affordable housing that is presently required. Clearly for future affordable provision to be yielded, the allocated figure would need to be significantly higher. It is considered that the Core Strategy is unsound in that it cannot meet the future housing needs for market homes and affordable homes through the allocations proposed in Policy WCS2. To make the Core Strategy sound, it is considered that the housing allocation should be increased to a figure in the order of 900 new homes. The description of Crowborough set out in paragraph 6.33 includes a number of comments that are either incorrect, or of questionable relevance. It is suggested that the number of people living in the town that also work in the town is low, however there is no indication as to what the Council think it should be. There can be no doubt that compared to Stone Cross and Westham, Willingdon and Polegate the proportion is much higher, and yet the strategy aims to locate far more housing in these settlements than Crowborough. There is no justification for this inconsistent approach. The Council mentions that the railway station is some distance from the town centre. The residents of Crowborough do not all live in the town centre, and a very large proportion of them live within easy walking distance of the railway station. The service is very well used. Hailsham, where the largest housing allocations are proposed, does not have a railway service at all, as well as relatively limited bus links. The location of Crowborough’s railway station is no justification for suggesting that the town is less suited to new development. The Council refers to out-commuting to Tunbridge Wells, East Grinstead and Uckfield, however there is no mention of the number of Crowborough residents that commute into London. It is not accepted that a significant number of Crowborough residents commute to East Grinstead or Uckfield, however it is known that a very large number commute to London, using the train service. This is a sustainable form of living and working which the Council has made no reference to. The Council states the “the employment centres in the town attract vehicles along suitable restricted residential roads”. This is a wholly misleading over-generalisation. Not all existing employment sites are as inaccessible as suggested. The need for more employment in the town, and the significant housing need that exists are clear and should be given significant weight. What should be taken into account is the stronger housing market in the town compared to much of the rest of the district. The fact that it is close to Tunbridge Wells makes it a desirable place to live, as does the good train service into London, and the attractive landscape around the town. This means that it can deliver housing at a higher and more consistent rate than many other parts of the District.

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Details of Reasons for Soundness/ Legal Complaince:

1. The description of Crowborough set out in paragraph 6.33 includes a number of comments that are either incorrect, or of questionable relevance. It is suggested that the number of people living in the town that also work in the town is low, however there is no indication as to what the Council think it should be. There can be no doubt that compared to Stone Cross and Westham, Willingdon and Polegate the proportion is actually much higher, and yet the strategy aims to locate far more housing in these settlements than Crowborough. There is no justification for this inconsistent approach.

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Details of Changes to be Made:

At least 900 new dwellings should be provided at Crowborough.
Summary of all Representations - Proposed Submission Core Strategy Regulation 27 - Report 11th July 2011

Representation ID
147

Person ID Mr Maunders
521073

Agent ID Mr Maunders
521070

Charles Maunders Consultancy Ltd

Paragraph 6.38

Sound ☐ Yes ☑ No ☐ Justified ☑ Effective ☐ Consistent with national policy

Legally Compliant ☑ Yes ☐ No

Details of Reasons for Soundess/ Legal Complaince:
Further consideration to alternative sites should be made before allocation of the South East Urban Extension. We would like to propose Brook Farm, High Broom Road, Crowborough as a suitable alternative to development.

Details of Changes to be Made:
All proposed housing allocations should be tested through the publication/ consultation of the Site Allocations DPD before such areas are proposed/ Allocated in the Core Strategy.

Representation ID
711

Person ID Mr Bee
520852

Agent ID The Nevill Estate Company Limited

Paragraph 6.38

Sound ☐ Yes ☐ No ☐ Justified ☐ Effective ☐ Consistent with national policy

Legally Compliant ☐ Yes ☐ No

Details of Reasons for Soundess/ Legal Complaince:
Object to the development of residential infill at Jarvis Brooks (SD9) to commence around 2015, to included both open market and affordable housing.

Details of Changes to be Made:

Representation ID
709

Person ID Mr Guntrip
513826

Agent ID

Paragraph 6.38

Sound ☐ Yes ☐ No ☐ Justified ☐ Effective ☐ Consistent with national policy

Legally Compliant ☐ Yes ☐ No

Details of Reasons for Soundess/ Legal Complaince:
No housing should be built in Walshes Road or Palesgate Lane until the road transport problems have been properly addressed, by the building of a by-pass of Jarvis Brook and Rotherfield. An independent study of the effects of increased surface water from proposed development sites on existing residential areas should be undertaken and better surface water drainage planned for Jarvis Brook prior to the building of houses at South East Crowbrough (SD10). An area already designated as at risk from flooding.

Details of Changes to be Made:
Details of Reasons for Soundess/ Legal Complaince:
The Unit is concerned about the identification of a site in the AONB on the edge of Crowborough adjacent the Goldsmith leisure centre. While acknowledging this is a reserve/contingency identification, it still proposes a major housing site within the AONB which may also compromise the integrity of the AONB boundary in this location.

Details of Changes to be Made:
1. The description of Crowborough set out in paragraph 6.33 includes a number of comments that are either incorrect, or of questionable relevance. It is suggested that the number of people living in the town that also work in the town is low. However there is no indication as to what the Council think it should be. There can be no doubt that compared to Stone Cross and Westham, Willingdon and Polegate the proportion is actually much higher, and yet the strategy aims to locate far more housing in these settlements than Crowborough. There is no justification for this inconsistent approach. 2. The Council mentions that the railway station is some distance from the town centre. In practice however, the majority of residents of Crowborough do not live in the town centre, and a very large proportion of them live within easy walking distance of the railway station. The service is well used. By comparison, Hailsham, where much the largest housing allocations are proposed, does not have a railway service at all, as well as realltively limited bus links. The location of Crowborough's railway station is no justification for suggesting that the town is less suited to new development. 3. The Council refers to out-commuting to Tunbridge Wells, East Grinstead aned Uckfield however there is no mention of the number of Crowborough residents that commute into London. It is not accepted that significant number of Crowborough residents commute to East Grinstead or Uckfield, however it is known that a very large number commute to London using the train service. This is a sustainable form of living and working which the Council has made no reference to. 4. The Council states that "the employment centres in town attract vehicles along unsuitable restricted residential roads". This is a wholly misleading over-generalisation. Not all existing employment sites are as inaccessible as suggested. 5. The need for more employment in the town and the significant housing need that exists are clear and should be given significant weight. What should be taken into account is the stronger housing market that in the town compared to the south-east of the town. This land is not in the AONB, well away from the exclusion zone around the Ashdown Forest Special Protection Area, close to the station and close to existing employment area. In view of all of these factors, and the ability of Crowborough to deliver more houses within the plan period than many of the other settlements it is considered that there is no justification in restricting the number of new dwellings allocated for the town to just 300. The town could easily deliver 90 additional dwellings per year over the remainder of the plan period and the number allocated should be at least 900. 8. In this context, the residential provision identified as a contingency urban extension on land north of the A16 should be brought forward for development and not be dependent on progress on other sites. This land is available for development now, it is in a sustainable location and is deliverable. Although within the AONB it can be developed while at the same time preserving its main landscape features. Housing development will not be intrusive into the surrounding landscape and will appear as a logical contained extension to the built up area of the town. In order to illustrate these points two drawings have been appended. One shows the opportunities and contraint that effect the site, and the other is a simple masterplan of how the site might be developed for housing while preserving the tree lines and hedgerows which represent the key landscape features on the site. The site also provides the opportunity to make a direct contribution to the reacational facilities at the adjoining Goldsmiths Leisure Centre as part of any scheme.

Details of Changes to be Made:
At least 900 new dwellings should be provided at Crowborough (in addition to existing commitments etc.) Land North of the A26 should be identified for development immediately and not be a 'contingency site'.

Summary of all Representations - Proposed Submission Core Strategy Regulation 27 - Report 11th July 2011

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Paragraph 6.38

Sound ☑ No ☑ Justified ☑ Effective ☑ Consistent with national policy

Details of Reasons for Soundess/ Legal Complaince:
1. The description of Crowborough set out in paragraph 6.33 includes a number of comments that are either incorrect, or of questionable relevance. It is suggested that the number of people living in the town that also work in the town is low. However there is no indication as to what the Council think it should be. There can be no doubt that compared to Stone Cross and Westham, Willingdon and Polegate the proportion is actually much higher, and yet the strategy aims to locate far more housing in these settlements than Crowborough. There is no justification for this inconsistent approach. 2. The Council mentions that the railway station is some distance from the town centre. In practice however, the majority of residents of Crowborough do not live in the town centre, and a very large proportion of them live within easy walking distance of the railway station. The service is well used. By comparison, Hailsham, where much the largest housing allocations are proposed, does not have a railway service at all, as well as realltively limited bus links. The location of Crowborough's railway station is no justification for suggesting that the town is less suited to new development. 3. The Council refers to out-commuting to Tunbridge Wells, East Grinstead aned Uckfield however there is no mention of the number of Crowborough residents that commute into London. It is not accepted that significant number of Crowborough residents commute to East Grinstead or Uckfield, however it is known that a very large number commute to London using the train service. This is a sustainable form of living and working which the Council has made no reference to. 4. The Council states that "the employment centres in town attract vehicles along unsuitable restricted residential roads". This is a wholly misleading over-generalisation. Not all existing employment sites are as inaccessible as suggested. 5. The need for more employment in the town and the significant housing need that exists are clear and should be given significant weight. What should be taken into account is the stronger housing market that in the town compared to the south-east of the town. This land is not in the AONB, well away from the exclusion zone around the Ashdown Forest Special Protection Area, close to the station and close to existing employment area. In view of all of these factors, and the ability of Crowborough to deliver more houses within the plan period than many of the other settlements it is considered that there is no justification in restricting the number of new dwellings allocated for the town to just 300. The town could easily deliver 90 additional dwellings per year over the remainder of the plan period and the number allocated should be at least 900. 8. In this context, the residential provision identified as a contingency urban extension on land north of the A16 should be brought forward for development and not be dependent on progress on other sites. This land is available for development now, it is in a sustainable location and is deliverable. Although within the AONB it can be developed while at the same time preserving its main landscape features. Housing development will not be intrusive into the surrounding landscape and will appear as a logical contained extension to the built up area of the town. In order to illustrate these points two drawings have been appended. One shows the opportunities and contraint that effect the site, and the other is a simple masterplan of how the site might be developed for housing while preserving the tree lines and hedgerows which represent the key landscape features on the site. The site also provides the opportunity to make a direct contribution to the reacational facilities at the adjoining Goldsmiths Leisure Centre as part of any scheme.

Details of Changes to be Made:
At least 900 new dwellings should be provided at Crowborough (in addition to existing commitments etc.) Land North of the A26 should be identified for development immediately and not be a ‘contingency site’.
Details of Reasons for Soundess/ Legal Complaince:
The Core Strategy is considered to be unsound on the basis that insufficient new homes are allocated for the town. This is demonstrated by reference to paragraph 6.33 which identifies a current need for 305 new affordable homes. The Core Strategy identifies only 300 new homes in total for Crowborough over its 24-year duration, which is less than the current level of need for affordable homes on their own. This would appear to be a fundamental flaw in the strategy and demonstrable proof that the Core Strategy under-provides new housing allocations for Crowborough. On the basis that new development will need to provide 35% affordable homes, Crowborough will need to have allocated a minimum of 872 new homes to deliver the level of affordable housing that is presently required. Clearly for future affordable provision to be yielded, the allocated figure would need to be significantly higher. It is considered that the Core Strategy is unsound in that it cannot meet the future housing needs for market homes and affordable homes through the allocations proposed in Policy WCS2. To make the Core Strategy sound, it is considered that the housing allocation should be increased to a figure in the order of 900 new homes. The description of Crowborough set out in paragraph 6.33 includes a number of comments that are either incorrect, or of questionable relevance. It is suggested that the number of people living in the town that also work in the town is low, however there is no indication as to what the Council think it should be. There can be no doubt that compared to Stone Cross and Westham, Willingdon and Polegate the proportion is much higher, and yet the strategy aims to locate far more housing in these settlements than Crowborough. There is no justification for this inconsistent approach. The Council mentions that the railway station is some distance from the town centre. The residents of Crowborough do not all live in the town centre, and a very large proportion of them live within easy walking distance of the railway station. The service is very well used. Hailsham, where the largest housing allocations are proposed, does not have a railway service at all, as well as relatively limited bus links. The location of Crowborough's railway station is no justification for suggesting that the town is less suited to new development. The Council refers to out-commuting to Tunbridge Wells, East Grinstead and Uckfield, however there is no mention of the number of Crowborough residents that commute into London. It is not accepted that a significant number of Crowborough residents commute to East Grinstead or Uckfield, however it is known that a very large number commute to London, using the train service. This is a sustainable form of living and working which the Council has made no reference to. The fact that it is close to Tunbridge Wells makes it a desirable place to live, as does the good train service into London, and the attractive landscape around the town. This means that it can deliver housing at a higher and more consistent rate than many other parts of the District.

Details of Changes to be Made:
Figure 9 identifies land for an urban extension to the south east of the town, and for residential development at Jarvis Brook. None of this land is within the AONB, it is well away from the exclusion zone around the Ashdown Forest Special protection Area, and is close to the railway station and existing employment areas. In view of all of these factors, and the ability of Crowborough to deliver more houses within the plan period than many of the other settlements it is considered that there is no justification in restricting the number of new dwellings allocated for the town to just 300. The town could easily deliver 90 additional dwellings per year over the remainder of the plan period and the number allocated should be at least 900.
Details of Reasons for Soundess/ Legal Complaince:

1. The description of Crowborough set out in paragraph 6.33 includes a number of comments that are either incorrect, or of questionable relevance. It is suggested that the number of people living in the town that also work in the town is low, however there is no indication as to what the Council think it should be. There can be no doubt that compared to Stone Cross and Westham, Willingdon and Polegate the proportion is actually much higher, and yet the strategy aims to locate far more housing in these settlements than Crowborough. There is no justification for this inconsistent approach. 2. The Council mentions that the railway station is some distance from the town centre. In practice however, the majority of the residents of Crowborough do not live in the town centre, and a very large proportion of them live within easy walking distance of the railway station. The service is well-used. By comparison, Hailsham, where must the largest housing allocations are proposed, does not have a railway service at all, as well as relatively limited bus links. The location of Crowborough’s railway station is no justification for suggesting that the town is less suited to new development. 3. The Council refers to out-commuting to Tunbridge Wells, East Grinstead and Uckfield, however there is no mention of the number of Crowborough residents that commute into London. it is not accepted that significant number of Crowborough residents commute to East Grinstead or Uckfield, however it is known that a very large number commute to London, using the train service. This is a sustainable form of living and working which the Council has made no reference to. 4. The Council states that “the employment centres in the town attract vehicles along unsuitable restricted residential roads”. This is a wholly misleading over-generalisation. Not all existing employment sites are as inaccessible as suggested. 5. The need for more employment in the town, and the significant housing need that exists are clear and should be given significant weight. What should be taken into account is the stronger housing market that in the town compared to much of the rest of the district. The fact that it is close to Tunbridge Wells makes it a desirable place to live, as does the good train service into London, and the attractive landscape around the town. This means that it can deliver housing at a higher and more consistent rate than many other parts of the District. 6. The Core Strategy is considered to be unsound on the basis that insufficient new homes are allocated for the town. This is demonstrated by reference to paragraph 6.33 which identifies a current need for 304 new affordable homes. The Core Strategy identifies only 300 new homes in total for Crowborough over its 24 year duration, which is less than its current leve of need for affordable homes alone. This would appear to be a fundamental flaw in the strategy and demonstrable proof that the Core Strategy under-provides new housing allocations for Crowborough. On the basis that new development will need to provide 35% affordable homes, Crowborough will need to have allocated a minimum of 872 new homes to deliver the level of affordable housing that is presently required. Clearly for future affordable provision to be yielded, the allocated figure would need to be significantly higher. 7. It is considered that the Core Strategy is unsound in that it cannot meet the future housing needs of market homes and affordable homes through the allocation proposed in Policy WCS2. Figure 10 identifies land for an urban extension to the south-east of the town. This land is not in the AONB, well away from the exclusion zone around the Ashdown Forest Special Protection Area, close to the station and close to existing employment area. In view of all of these factors, and the ability of Crowborough to deliver more houses within the plan period than many of the other settlements it is considered that there is no justification in restricting the number of new dwellings allocated for the town to just 300. The town could easily deliver 90 additional dwellings per year over the remainder of the plan period and the number allocated should be at least 900.

Details of Changes to be Made:

At least 900 new dwellings should be provided at Crowborough.
Details of Reasons for Soundness/ Legal Compliance:

Crowborough Area Strategy (paragraphs 6.33 – 6.38: Policy WCS2, Figure 9) 1 The Core Strategy is considered to be unsound on the basis that insufficient new homes are allocated for the town. This is demonstrated by reference to paragraph 6.33 which identifies a current need for 305 new affordable homes. The Core Strategy identifies only 300 new homes in total for Crowborough over its 24 year duration, which is less that its current level of need for affordable homes on their own. This would appear to be a fundamental flaw in the strategy and demonstrable proof that the Core Strategy under-provides new housing allocations for Crowborough. On the basis that new development will need to provide 35% affordable homes, Crowborough will need to have allocated a minimum of 872 new homes to deliver the level of affordable housing that is presently required. Clearly for future affordable provision to be yielded, the allocation figure would need to be significantly higher. 2 It is considered that the Core Strategy is unsound in that it cannot meet the future housing needs of market homes and affordable homes through the allocation proposed in Policy WCS2. To make the Core Strategy sound, it is considered that the housing allocation should be increased to a figure in the order of 900 new homes.

Details of Changes to be Made:

3 Land that is available and free of constraint is identified in the Council’s SHLAA as a suitable site for allocation and early release (site 095/1110). It can make a material contribution to the higher overall strategic allocation that is required by the town. Unlike many of the town’s potential peripheral sites, it is not within the AONB which is considered to be a material advantage.

Details of Reasons for Soundness/ Legal Compliance:
Policies to restrain traffic, obtain modal shift in travel, reducing need to travel and improve the experience of non-car travel need to be sharpened and focused. Aspirations for these to happen must have necessary circumstances incorporated into the policies.

Details of Changes to be Made:
Demand management techniques for traffic in Hailsham (6.15) should be included in all the related and equivalent policies. There should be a definite commitment to traffic reduction measures and targets throughout the Strategy Plan document.
Paragraph 6.38

Details of Reasons for Soundness/Legal Compliance:

Other Issues - Density of Development The Crowborough councillors are concerned about the recent density of development and how it relates to the results of Crowborough's Health Check and subsequent visioning document (Top of the Weald). Both documents stress the state's desire of local people to live in a small town in the countryside with a rural feel. The density of recent developments does not uphold this principle in any way and are severely damaging the character of Crowborough as a small rural town. There is too little space between buildings and inadequate open space within developments to create a sense of linkage with the countryside.

Details of Changes to be Made:

Sound ☐ Yes ☐ No ☐ Justified ☑ Effective ☘ Consistent with national policy
Legally Compliant ☑ Yes ☘ No

Paragraph 6.38

Details of Reasons for Soundness/Legal Compliance:

St Richards Church considers that the scale of growth at Crowborough is insufficient to meet the needs of the town and the areas of deprivation within it. It supports development at Jarvis Brook but considers that a larger development of houses is needed to help to meet the housing needs of the areas and deliver the range of services necessary to support the local population.

Details of Changes to be Made:

Sound ☐ Yes ☑ No ☐ Justified ☑ Effective ☘ Consistent with national policy
Legally Compliant ☑ Yes ☘ No

Paragraph 6.38

Details of Reasons for Soundness/Legal Compliance:

Allocation of Urban Extension SD10 for housing Development in this location would put severe pressure on the wholly inadequate highway infrastructure in this part of Crowborough. Fermor Road and Whitehill are of great concern, but of even greater concern is Western Road. There is no possibility of widening Western Road and any proposal for a one way system would put pressure on even less suitable roads, such as Mount Pleasant. For these reasons, any allocation of housing land which is near to and depends on Western Road is unsound.

Details of Changes to be Made:
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**Sound**
- ☑ No
- ☐ Justified
- ☑ Effective
- ☐ Consistent with national policy

**Legally Compliant**
- ☐ Yes
- ☑ No

**Details of Reasons for Soundess/ Legal Compliance:**

Paragraph 6.38 sets out a strategy for Crowborough which is generally supported by Rydon but does not have any clear end objective or critical path. The extent of development envisaged is inadequate and most of the strategy is not founded upon any clear plan or policy and therefore is not capable of monitoring or implementation. The strategy is too vague and is not supported by the other policies of the plan. The proposed level of housing provision will not, contrary to the statement at 6.38, provide for housing demand and need.

**Details of Changes to be Made:**

Re-write the strategy for Crowborough with more meaningful objectives that are better supported by the evidence base and will be more effective in addressing the need to take advantage of the development potential of the town and ensure its future economic prosperity whilst also meeting local and wider housing needs.

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### Representation ID

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**Sound**
- ☑ No
- ☐ Justified
- ☐ Effective
- ☐ Consistent with national policy

**Legally Compliant**
- ☐ Yes
- ☑ No

**Details of Reasons for Soundess/ Legal Compliance:**

"Supplementary documents have been submitted but not attached, and may be viewed at the Council offices on request". Paragraph 6.38. Amend to reflect increased housing requirement. The increase is small and can be met at existing sites by increasing density.

**Details of Changes to be Made:**

REVISION SOUGHT Increase total number of new dwellings to 450. Increase SD8 and SD9 provision to 210 and increase SD10 to 240.
Sound ☐ Yes ☑ No ☑ Justified ☐ Effective ☑ Consistent with national policy
Legally Compliant ☐ Yes ☑ No

Details of Reasons for Soundess/ Legal Complaince:

1. The Core Strategy is not legally compliant and is unsound because of its proposals for an urban extension to the north west of Heathfield (Strategic Development Area SD11). 2. Whilst the principle of accommodating housing growth in the broad location of north west Heathfield is supported, the Core Strategy's proposals are deficient because they: (a) fail to take a comprehensive approach to the development of this area and so are not founded on a robust and credible evidence base and are not the most appropriate strategy when considered against the reasonable alternatives in this location, thus failing the soundness test in paragraph 4.36 of PPS12 that they are “justifiable”. (b) constitute an unjustified encroachment into the High Weald AONB and so are not the most appropriate strategy when considered against the reasonable alternatives in this location, thus failing the same “justifiable” test in PPS12 and also the soundness test in paragraph 4.52 of PPS12 that they are “consistent with national policy”. Paragraph 16(v) of PPS7 requires the Council in preparing the Core Strategy to “conserve…sites of landscape…value, in accordance with statutory designations”. Paragraph 22(ii) of PPS7 requires that “major developments” should only take place within the AONB after “the most rigorous examination” and an assessment of “the scope for developing elsewhere outside the designated area or meeting the need for it in some other way”. The Council has failed to properly assess the scope for meeting the need for development on previously developed land at north west Heathfield that is not in the AONB. (c) utilise less accessible and less sustainable land and so are not the most appropriate strategy when considered against reasonable alternatives in this location, thus failing the same “justifiable” test in PPS12. (d) fail to provide adequate safeguarding of amenities of existing dwellings (if those dwellings are to be excluded from the urban extension as currently proposed) and fail to integrate into the existing urban form, thus failing the soundness test in paragraph 4.52 of PPS12 that the proposals are consistent with national policy. Paragraph 34 of PPS1 and paragraph 13 of PPS3 require the Council to reject design which is “inappropriate in its context” and paragraph 35 of PPS1 requires development to be designed so that it will be “integrated into the existing urban form and the natural and built environments”. THE PROPOSED SUBMISSION CORE STRATEGY 3. We object to the following parts of the Core Strategy. Because the objections are interconnected, we have set out all the relevant matters in this response, although this particular objection only relates to the specific part of the Core Strategy identified in our response to Q1 above. Our objections are as follows: (i) The omission from Spatial Planning Objective SPO1 of any reference to minimising the loss of nationally designated landscapes, including the High Weald AONB. Paragraph 16(v) of PPS7 requires the Council to conserve the AONB and since it is clear that the Council is proposing to meet part of the District’s development needs by using land within the AONB, the Council should establish a clear objective that only the minimum AONB land should be used for this purpose and wherever possible non-AONB land should be used in preference. (ii) The reference in Policy WCS2 to the broad locations for housing development being shown as insets on the Key Diagram. We object to the inset for Heathfield in relation to the way it shows the proposal SD11 and consequently object to this reference to that inset plan in Policy WCS2. (iii) The reference in Policy WCS4 to SD11: Land at North West of Heathfield. We object to the way that SD11 is described in Chapter 6 of the Core Strategy and shown on the Key Diagram and as a result object to the reference to SD11 in Policy WCS4. (iv) The omission from paragraph 5.8 of any aim to maximise the use of previously developed land in meeting existing and future housing needs. Notwithstanding the recent changes to PPS3 it remains a national objective to prioritise the use of previously developed land, in accordance with paragraph 21 of PPS1 and paragraph 40 of PPS3. (v) The reference in paragraph 6.40 to the identification of potential sites for housing “through the SHLAA”. We object to the inclusion of Site 155/1210 in its current form as shown in the SHLAA and consequently object to this reference to that site in paragraph 6.40. (vi) The reference in paragraph 6.41 to the “most suitable location” being “within the AONB” and that this land could be developed “without strategic adverse impact on the landscape”. The Council’s evidence base does not demonstrate that the land within the AONB is more suitable for development than the non-AONB previously developed land on High Street. There is no assessment by the Council of the suitability of this non-AONB land (which includes the objector’s land at Lavender Cottage, High Street, Heathfield, TN21 0UP) and yet it is more suitable than the AONB land, being (i) not subject to a national landscape designation, (ii) previously developed land, (iii) within the existing settlement boundary, and (iv) well related and integrated into the urban area and existing transport connections. In addition, the Council’s evidence base does not show that 160 dwellings can be provided in the AONB without strategic adverse impact on the landscape. The capacity of 160 dwellings for SD11 would appear to derive from the assumed capacity of 2 adjacent SHLAA sites at north west Heathfield (Site 155/1210 with a capacity of 123 dwellings at 40 dph and Site 307/1210 with a capacity of 35 dwellings at 35 dph). The Council’s Landscape Character Assessment (February 2009) shows at Figure 5 that large parts of these...
SHLAA sites are required to be retained as open space to provide a “landscape buffer” to Tilsmore Wood. If those buffers are to be provided as recommended in the Landscape Character Assessment, the SHLAA sites will not be able to deliver the required capacity, without radical changes to the assumed density, and there has been no assessment of the impact of higher density development on the AONB and on the landscape setting and character of Tilsmore Wood. The claim therefore that SD11 can be achieved without strategic adverse impact on the AONB is not supported by the evidence base. (vii) The reference in paragraph 6.41 to the release of AONB land being justified “as no suitable alternative non-AONB location exists”. The Council’s evidence base does not substantiate this assertion. The Council has not assessed the suitability of the non-AONB land in this location which fronts High Street (including the objectors’ land at Lavender Cottage). This non-AONB land is within the settlement limits of Heathfield as identified on the Proposals Map of the saved Local Plan and paragraph 6.48 of the Core Strategy confirms that within development boundaries “the principle of development is acceptable”. The principle of redeveloping this land to provide more intensive residential development has already been accepted by the Council, with the grant of planning permissions at Brackenside (WD/08/0329) for 3 dwellings in place of 1 dwelling, and at Oaksdown/Lowlands (WD/2011/0400) for 9 apartments in the place of 2 dwellings. The more intensive development of the non-AONB land on the High Street frontage would minimise (or may even remove) the need for the use of AONB land. This option would plainly be a more suitable alternative than the use only of land “within the AONB” as proposed in the Core Strategy. (viii) The reference in paragraph 6.41 to “no suitable alternative contingency land is available”. The land at Oaksdown/Lowlands is available for development (as confirmed by the recent renewal of planning permission). The objectors’ land at Lavender Cottage is available for development (and this has been made known to the Council since at least August 2010). The land at Woodhatch is relied on as being available for development in order to provide the access for SHLAA site 155/1210. The objectors understand that the land at Holmhurst could be made available for development. Thus, there is a continuous frontage of 5 plots of non-AONB land available (all with generous areas of garden land, most of which is excluded from the AONB) just on this part of the High Street. Were the Council to actively promote a comprehensive redevelopment of this area it is likely that other land in the vicinity would be made available. However, the Council has simply failed in its evidence base to assess this option. If it is necessary to identify contingency land then the hinterland of AONB land should be identified as contingency land, with priority being given to the development of the non-AONB land on the High Street frontage. Prioritising that land would be consistent with the policy objectives of minimising the loss of AONB land and maximising the use of previously developed land. (ix) The reference in paragraph 6.42 item 3 to SD11 being “on land adjacent to the urban area”. The proposal for SD11 should not be defined in a way which excludes the urban area and which focuses only on land within the AONB. The proposal should embrace the urban area and the development should maximise the use of previously developed land in the urban area to achieve the provision of 160 dwellings before any consideration is given to the use of land in the AONB. (x) Figure 10 Heathfield Area Strategy. This diagram shows SD11 as located within the AONB and beyond the existing settlement. The diagram should not exclude the inclusion of the existing built up area in this location within the scope of SD11. The built up area has the potential and the capacity to be redeveloped and this aim should be the first priority at north west Heathfield. (xi) Key Diagram: the inset for Heathfield. The inset shows Heathfield and Proposal SD11 in the same way that they are shown on Figure 10 and they are not acceptable for the same reason set out at (x) above. 4. We now propose to elaborate on these objections. Piecemeal not comprehensive 5. SD11 takes an opportunistic approach. It utilises substantial areas of greenfield land as the main development areas (and by implication from the SHLAA one existing property simply as a means of access). Although the SHLAA indicates that Site 155/1210 is in multiple ownerships and Site 307/1210 is owned by a company with 7 shareholders, the choice of this location seems to be influenced simply by the fact that these 2 sites were promoted in the SHLAA and so it is assumed they are available. Site 155/1210 is said to be under the control of a housing developer. We are not aware whether the Council has seen the terms of any option or other legal agreement giving such control but, given that the Proposed Submission Core Strategy is a long term strategy to 2030 and its trajectory does not anticipate the site coming forward before 2015/16, little weight can be given to the status of any current contractual arrangements. 6. Any sensible spatial planning approach to the development of this area would not look at the sites promoted in the SHLAA in isolation but would look to see how that development would relate to its local context and how it would relate to the settlement it is intended to form a part of. 7. The site of SD11 is on sloping ground set back behind existing development which separates the site from the rest of Heathfield. Development as proposed will not integrate the development with its local context as required by paragraph 35 of PPS1. Nor will it maximise the opportunities for the site to benefit from clear and easy links to the facilities in the local service centre by non-car modes. 8. A comprehensive approach would look at the whole of the area in this north western part of Heathfield and then seek to identify the land which is most suited to development. It is common sense that this would start by looking at the land with the best links by foot, cycle, and public transport to the rest of the settlement. That is of course the frontage land along Heathfield Road/High Street itself. The frontage land also contains the previously developed land comprising the existing dwellings and their various outbuildings. Whilst the recent revisions to PPS3 have removed garden land from the definition of previously developed land, the footprint of the buildings and their associated driveways and hardstandings clearly have a higher priority for development than a greenfield meadow. 9. The present objectors, as the owners of Lavender Cottage, are willing to make their land available as part of a wider development. The objectors have made this known to the Council since at least August 2010. The principle of redevelopment for more intensive residential development has already been established on land to the wets (WD/08/0329) and on the adjoining site.
to the east of Lavender Cottage (WD/2011/0400). Although planning permission was granted for a block of flats (WD/2008/0276), that development has not come forward and the permission has recently had to be renewed. Clearly, the land is available for development, even if the form of development is not at present attractive to the market. We understand that the owner of the adjoining plot at Holmhurst would be prepared to make that site available. Woodhatch is relied on as available in the SHLAA (Site 155/1210 refers). Thus there is already a substantial amount of the frontage land which is available for development. A spatial approach to the planning of this area would look to utilise this developed frontage land, which plainly has development potential, before turning to the undeveloped hinterland to the rear. Unjustified Encroachment into the AONB 10. The Proposed Submission Core Strategy recognises that SD11 lies within the AONB, where there is strict control over new development. Paragraph 22 of PPS7 is clear that major development in the AONB requires “the most rigorous examination” and that such development should only be accepted after assessment of the scope for meeting the need elsewhere. Under the GDMO 2010 “major development” is a development of 10 or more dwellings. Under the Secretary of State’s arrangements for the recovery of appeals on the basis that they are large/controversial, the threshold is 150 residential units. On either basis, a development of 160 dwellings is major development. In any event, the Council has accepted in the SHLAA that “there is a requirement to demonstrate development is essential to meet local needs and that other more suitable sites do not exist elsewhere” (Site 155/1210). The claimed rationale for the use of AONB land in this case is that “no suitable alternative non-AONB location exists”. This is patently incorrect. As already noted, the frontage land is not within the AONB and if the desire is to achieve a development of some 160 dwellings there can be no justification for taking more AONB land than is absolutely necessary when there is non-AONB land in the same location which is available. 11. Whilst it may be doubtful that the frontage land which is known to be available could alone accommodate the full scale of the development sought, the need to encroach into the AONB would be very much reduced if the frontage land was used first. Such an approach would also enable the lower (and least accessible) parts of the meadow to be retained as open land, potentially providing a better buffer with the important woodland at Tilsmore Wood that makes up such a key component of the Wealden character. The need for such a buffer is recognised in the Landscape Character Assessment (Figure 5). In addition, if the Council made it clear that it was promoting the comprehensive development of the area, it is likely that other owners would also wish to make their land available, and the Council may therefore be able to avoid encroaching into the AONB to any material degree. 12. The Council’s claim that 160 dwellings can be provided in the AONB without strategic adverse impact on the landscape is not supported by the evidence base. The capacity of 160 dwellings for SD11 would appear to derive from the assumed capacity of the 2 adjacent SHLAA sites:Site 155/1210 and Site 307/1210. As already noted, the Council’s Landscape Character Assessment shows (Figure 5) that large parts of these SHLAA sites are required to be retained as open space to provide a “landscape buffer” to Tilsmore Wood. If those buffers are to be provided as recommended in the Landscape Character Assessment, the SHLAA sites will not be able to deliver the required capacity, without radical changes to the assumed density, and there has been no assessment of the impact of higher density development on the AONB and on the landscape setting and character of Tilsmore Wood. The claim therefore that SD11 can be achieved without strategic adverse impact on the AONB is not supported by the evidence base. Using Less Accessible and Less Sustainable Land 13. Similar considerations in terms of minimising the amount of AONB land apply in relation to accessibility issues. The lower parts of the sloping meadow land are not only more remote by simple distance from the footways and bus route along Heathfield Road/High Street, there is also the fact that journeys from home will inevitably be uphill for residents of that area. There will therefore be a disinclination to use non-car modes for accessing local services, even if they might appear to be within walking distance. It must also be doubted whether much of the hinterland is within the preferred 400m distance for access to a bus route. 14. In contrast, the frontage development is already connected to existing pedestrian routes by the adjacent footways and there is only a shallow fall in the land closest to the roadside. Accessibility to the bus route is also much improved. 15. Again, on any sensible measure of accessibility and sustainability, it cannot make sense to use the more remote hinterland in preference to the frontage land, PPS1 is clear at paragraph 35 that new development needs to be integrated into the urban area and address connectivity issues. The choice of a backland location for SD11 when the more accessible frontage land is available is directly contrary to this guidance Inadequate safeguarding of amenities 16. We have already explained why a comprehensive approach needs to be taken to this area. However, if the Council persists in its piecemeal approach then it is apparent that inadequate consideration has been given to the relationship between the retained frontage properties and the new development to the rear. The existing development is at a very low density and has the established character of a mature residential area, with individual dwellings in spacious plots. 17. The SHLAA indicates a proposed density for the new development of some 40 dwellings per hectare for Site 155/120. This will be substantially different in character and could only be achieved by ensuring a substantial buffer between the 2 very different forms of development. However, this would push the new development further into the AONB and would further separate the new development from the settlement of which it is intended to form a part. Again, there would be a conflict with the advice in PPS1 on integrating the development with the urban area. Soundness Tests 18. It is clear from the objections set out above that the proposals for SD11 are not founded on a robust and credible evidence base, cannot be shown to be the most appropriate strategy when considered against the reasonable alternatives, and are not consistent with national policy in PPS1, PPS3, and PPS7 in several important respects. They therefore fail 2 of the key tests of soundness as set out at paragraph 4.52 of PPS12. Legal Tests 19. These objections also have the consequence that the Council’s failure to properly consider reasonable alternatives to its proposals at
north west Heathfield, and in particular to consider the alternative of an area of growth in this location planned on a comprehensive basis and focused on maximising the use of previously developed land and minimising the use of land within the AONB, has the consequence that the Sustainability Appraisal/Strategic Environmental Assessment that accompanies the Core Strategy is legally deficient and the Core Strategy is consequently not legally compliant with the requirements of either Regulation 5(1) of the Environmental Assessment of Plans and Programmes Regulations 2004 or with the requirements of s.19(5) and s.20(2) Planning & Compulsory Purchase Act 2004. In addition, the same failings, together with the lack of a credible and robust evidence base to support those proposals and the conflicts with national policy mean that the Core Strategy is not “sound” as required by s.20(5)(b) PCPA 2004. 20. The SA/SEA considers, in broad terms, alternative locations for growth at Heathfield as between the north east, north west, and west of the town. However, what it fails to do is to look at reasonable alternatives within the selected north west location. It is no answer for the Council to suggest that this level of detail is a matter for a later DPD because the Core Strategy is already spatially specific that the location of north west Heathfield is an “urban extension” (i.e. an addition) and that it is “within the AONB” (i.e. outside the settlement boundary. The same spatial approach is shown on Figure 10 and on the Inset for the Key Diagram. The Council is not, therefore, able to avoid grappling with the spatial implications of this choice as part of the Core Strategy and testing it against reasonable alternatives. However, it is clear that this is not an exercise that has been attempted in the SA/SEA. 21. The Council will be well aware from the recent decision in Save Historic Newmarket Ltd v Forest Heath District Council [2011] EWHC 606 (Admin) that a failure in the SA/SEA to give proper consideration to identification and assessment of reasonable alternatives is likely to result in a quashing of the relevant parts of the Core Strategy. Conclusion 22. For all of these reasons the objectors strongly suggest that neither the Council nor the Inspector should endorse the present proposals for SD11. What is required is a fundamental rethink to achieve an integrated, sustainable and accessible development which minimises the impact on the AONB and provides a comprehensive spatial approach to the development of this area. Essentially this requires the focus to shift from the “easy target” of greenfield meadows to a more considered approach, giving priority to the previously developed frontage land, and only considering the AONB hinterland to the minimum extent necessary to achieve the required dwelling numbers.

Details of Changes to be Made:
Change Figure 10 to remove the red/pink notation and replace it by a red dwellinghouse symbol located within the urban area to the immediate north of the A265, and replace the text annotation by the words “Comprehensive development area at north west Heathfield (SD11) (residential provision)".
Heathfield Area Strategy - SUPPORT 2.47 As set out above, we consider the Strategy for Heathfield is ‘suitable’ and ‘deliverable’ within the context of the Evidence Base. It is both ‘effective’ and ‘justified’ in this respect and therefore a ‘sound’ approach. We support paragraph 6.41 of the CS which identifies growth in North West Heathfield for 160 dwellings. This is supported in pp 68–71 and 94–95 of BP10: Sustainability Appraisal and summarised in pp 59–61 of BP1: Development of the Proposed Submission Core Strategy. 2.48 We consider this approach is ‘sound’, as it is based on the suitability of development sites in this location as identified in the SHLAA. Site specific technical reports/surveys have been undertaken to confirm the Site’s deliverability and potential infrastructure requirements at any subsequent planning application stage. 2.49 We have noted paragraph 6.42 of the CS and the seven point strategy, which seeks to ensure Heathfield continues its role as a Service Centre serving the local community and surrounding area. This strategy has been prepared with regard to the Heathfield and Waldron Parish Council ‘Visioning Document’ as evidenced in pages 13-14 of BP7: Summary of Town Masterplanning Documents. The ‘Visioning Document’ has been prepared with consultation with the local community and businesses. The document was finalised in April 2008 and some elements of the vision, such as town centre improvements, have already been implemented. 2.50 However, it should be noted that the development of 160 dwellings has limited opportunity to deliver all the aspirations as set out in the seven point strategy for the town. It is recognised the site can deliver significant benefits to the town (such as affordable housing, play areas etc), and will provide appropriate mitigation measures against any identified impact. This will be achieved through appropriate S106 Contributions in accordance with Circular 05/2005. It should not be expected that 160 dwellings will deliver all of the aspirations of the town. 2.51 The Heathfield ‘Visioning Document’ is a good example of how ‘emerging’ National Policy under the ‘Localism Bill’ could work. Summertree Estates has met with Members of Heathfield and Waldron Parish Council (January 2011) to discuss the potential development of the Site and the benefits development could bring to the community. As recognised by both the Parish Council and Housing Needs Survey (as evidenced in para 8.29 of BP2: Managing the Delivery of Housing), the delivery of Affordable Housing is considered to be one of the main priorities.

Details of Changes to be Made:

Yes

Sound

Legally Compliant

Yes
Summary of all Representations - Proposed Submission Core Strategy Regulation 27 - Report 11th July 2011

Representation ID
1493

Person ID  Mr  Williams
103948  Kember Loudon Williams

Agent ID

Heathfield Area Strategy Figure 10

Sound  No  Justified  Effective  Consistent with national policy

Legally Compliant  Yes  No

Details of Reasons for Soundess/ Legal Complaince:

1. The Proposed Submission Core Strategy places far too much weight on the "topographical and landscape constraints" that are said to affect the town, and far too little weight on the needs of the town in terms of its future housing and another development. While the A265 passes through the town this is not a constraint. Sites that are suitable for development as logical urban extensions are available that have perfectly adequate access. While some AONB land will need to be released, this will not have a detrimental impact on the wider landscape. The needs of the town, and the ability of the town to contribute more fully to the needs of the District as a whole are not adequately recognised in the Core Strategy. 2. Additional new housing development would meet the town's known housing needs, as well as making a significant contribution towards the shortfall of housing in the District that will occur within the plan period. The housing market in Heathfield is stronger than those settlements in the south of the District where the majority of new housing has been focussed. Heathfield need higher levels of new housing to provide more buoyancy in the market and choice for residents which will in turn avoid outward migration from the town and the risk of declining services and social infrastructure. A higher housing allocation will increase the demand for public transport services and future provision and allow the existing service to be maintained and improved. 3. The Council has identified land within the AONB on the north-western side of the town for new housing development, but the number of units has been limited to 160. It is considered that this figure should be much higher, not only because the town has the services and facilities needed to serve a larger number of households, but it would also help to safeguard the future vitality and viability of the town. The restrictive strategy currently proposed will only encourage dormancy in the settlement and actually harm the quality of life and standard of living of the local community in the longer term. 4. The Council has stated in its Core Strategy Background Paper in Housing Land Availability that it will assume a build-out rate of 60 dwellings per year on sites of less than 199 units (paragraph 2.7). This means that the housing on the allocated land will be completed and disposed of in just over two years. The town will then have a period of around 15 years until the end of the plan period when there will be no housing development except for a possible trickle of windfall sites. This cannot be a supportable approach. 5. Figure 10 identifies land adjacent to the town that is proposed for an urban extension. The figure is inaccurate because not all of the land to the north of the A265 is open to views from the wider landscape. In fact much of this land is enclosed by hedgerows and woodland planting. There would not be any undue impact on the wider landscape from a sensitively designed development. Similarly land adjoining the eastern settlement boundary has limited visual and landscape constraints which is explained in the submitted Landscape Character and Visual Impact Report. 6. The Core Strategy is unsound as it fails to make sufficient housing provision for the town. It is also unsound because it fails to provide sufficient numbers of affordable homes. paragraph 6.40 states that there is a current need for affordable housing for 112 households. to meet that demand from new development (based on a requirement of 35% affordable provision in Policy WCS8) a minimum of 320 new homes will be required in Heathfield to meet this current demand. Because demand is not static there will be further need for affordable housing throughout the Core Strategy period. To achieve its delivery targets for affordable homes, the allocated number of homes for Heathfield realistically needs to be in the order of 500+ over the duration of the Core Strategy, but with a significant allocation in the early phases to meet current demand. Due to the size of additional appendices they have not been uploaded but are available to view at the Council's offices.

Details of Changes to be Made:

7. Land to the east of the town has been put forward for inclusion in earlier incarnations of the Core Strategy, principally SHLAA sites 258/1210; and 259/1210 on the norther side of the A265 and additionally SHLAA sites 260/1210; 275/1210 and 299/11210 on the southern side of the A265. The land is available and can deliver highway improvements, new homes, open space and community provision at an early stage in a comprehensive approach. The Core Strategy is simply wrong at paragraph 6.41 where it states that there are no suitable alternative sites available. The above are sites that are demonstrably available and suitable as the submitted supporting reports clearly indicate. This land is favoured by the Parish Council for development and if allocated for in the order of 250 new homes, existing highway constraint would be addressed and contributions secured to provide social and community provision (such as the needed swimming pool identified at paragraph 6.39). This can be achieved at this scale and level of development but would not achieve these objectives at the level proposed in the Core Strategy. New housing at the proposed level will maintain the town's future vitality and economic wellbeing and will help to maintain local services and avoid the prospects of Heathfield being starved of investment and resources in the future, with the very real risk that present services will decline, and for the town to
simply become no more than a commuter town for the larger centres of Tunbridge Wells, Eastbourne and beyond.

Heathfield Area Strategy Figure 10

Sound: ☑ Yes ☐ No ☑ Justified ☑ Effective ☐ Consistent with national policy
Legally Compliant: ☑ Yes ☐ No

Details of Reasons for Soundness / Legal Compliance:
The Proposed Submission Core Strategy places far too much weight on the “topographical and landscape constraints” that are said to affect the town, and far too little weight on the needs of the town in terms of its future housing and other development. While the A265 passes through the town this is not a constraint. Sites that are suitable for development as logical urban extensions are available that have perfectly adequate access. While some AONB land will need to be released, this will not have a detrimental impact on the wider landscape. The needs of the town, and the ability of the town to contribute more fully to the needs of the district as a whole are not properly recognised in the Core Strategy. 2 Additional new housing development would meet the town’s known housing needs, as well as make a significant contribution towards the shortfall of housing in the District that will occur within the plan period. The housing market in Heathfield is stronger than those settlements in the south of the District where the majority of new housing has been focussed. It will increase the demand for public transport services, and allow the existing service to be maintained and improved. 3 The Council has identified land within the AONB on the north-western side of the town for new housing development, but the number of units has been limited to 160. It is considered that this figure should be much higher, not only because the town has the services and facilities needed to serve a larger number of households, it would also help to safeguard the future vitality and viability of the town. The restrictive strategy currently proposed will only encourage dormancy in the settlement and actually harm the quality of life and standard of living of the local community in the longer term. 4 The Council has stated in is Core Strategy Background Paper in Housing Land Availability that it will assume a build-out rate of 60 dwellings per year on sites of less than 199 units (paragraph 2.7). This means that the housing on the allocated land will be completed and disposed of in just over two years. The town will then have a period of around 15 years until the end of the plan period when there will be no housing development except for a trickle of windfall sites. This cannot be a justifiable approach. 5 Figure 10 identifies land adjacent to the town that is proposed for an urban extension. The figure is inaccurate because not all of the land to the north of the A265 is open to views from the wider landscape. In fact much of this land is enclosed by hedgerows and woodland planting. There would not be any undue impact on the wider landscape from a sensitively designed development. 6 In addition, this figure excludes land to the west of the area identified for an urban extension that is not in the AONB. The land at Tilsmore lodge is accessible, and visually and physically well-contained. Any urban extension to the north of the A265 should include this land. 7 The Core Strategy is unsound as it fails to make sufficient housing provision for the town. It is also unsound because it fails to provide sufficient numbers of affordable homes. Paragraph 6.40 states that there is a current need for affordable housing for 112 households. To meet that demand from new development (based on a requirement of 35% affordable provision in Policy WCS8), a minimum of 320 new homes will be required in Heathfield to meet this current demand. Because demand is not static, there will be further need for affordable housing throughout the Core Strategy period. To achieve its delivery targets for affordable homes, the allocated number of homes for Heathfield realistically needs to be in the order of 500 + over the duration of the Core Strategy, but with a significant allocation in the early phases to meet current demand.

Details of Changes to be Made:
A minimum of 500 dwellings should be provided at Heathfield, and Figure 10 should be amended to enlarge the area for residential provision to include the land to the west.
### Details of Changes to be Made:

Fig 10 We do not agree with any northward extension to Heathfield into the AONB
The figure is inaccurate because not all of the land to the north of the A265 is open to views from the wider landscape. In fact much of this land is enclosed by hedgerows and woodland planting. There would not be any

2. Additional new housing development would meet the town’s known housing needs, as well as making a significant contribution towards the shortfall of housing in the District that will occur within the plan period. The housing market in Heathfield is stronger than those settlements in the south of the District where the majority of new housing has been focussed. Heathfield need higher levels of new housing to provide more buoyancy in the market and choice for residents which will in turn avoid outward migration from the town and the risk of declining services and social infrastructure. A higher housing allocation will increase the demand for public transport services and future provision and allow the existing service to be maintained and improved. 3. The Council has identified land within the AONB on the north-western side of the town for new housing development, but the number of units has been limited to 160. It is considered that this figure should be much higher, not only because the town has the services and facilities needed to serve a larger number of households, but it would also help to safeguard the future vitality and viability of the town. The restrictive strategy currently proposed will only encourage dormancy in the settlement and actually harm the quality of life and standard of living of the local community in the longer term. 4. The Council has stated in its Core Strategy Background Paper in Housing Land Availability that it will assume a build-out rate of 60 dwellings per year on sites of less than 199 units (paragraph 2.7). This means that the housing on the allocated land will be completed and disposed of in just over two years. The town will then have a period of around 15 years until the end of the plan period when there will be no housing development except for a possible trickle of windfall sites. This cannot be a supportable approach. 5. Figure 10 identifies land adjacent to the town that is proposed for an urban extension. The figure is inaccurate because not all of the land to the north of the A265 is open to views from the wider landscape. In fact much of this land is enclosed by hedgerows and woodland planting. There would not be any undue impact on the wider landscape from a sensitively designed development. Similarly land adjoining the eastern settlement boundary has limited visual and landscape constraints which is explained in the submitted Landscape Character and Visual Impact Report. 6. The Core Strategy is unsound as it fails to make sufficient housing provision for the town. It is also unsound because it fails to provide sufficient numbers of affordable homes. paragraph 6.40 states that there is a current need for affordable housing for 112 households. to meet that demand from new development (based on a requirement of 35% affordable provision in Policy WCS8) a minimum of 320 new homes will be required in Heathfield to meet this current demand. Because demand is not static there will be further need for affordable housing throughout the Core Strategy period. To achieve its delivery targets for affordable homes, the allocated number of homes for Heathfield realistically needs to be in the order of 500+ over the duration of the Core Strategy, but with a significant allocation in the early phases to meet current demand. Due to the size of additional appendices they have not been uploaded but are available to view at the Council’s offices.

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simply become no more than a commuter town for the larger centres of Tunbridge Wells, Eastbourne and beyond

Representation ID
1480
Person ID 332748
Mr Nightingale
Millwood Designer Homes
Agent ID 102571
Mr Nightingale
Kember Loudon Williams
Paragraph 6.39
Sound ☐ Yes ☐ No ☑ Justified ☑ Effective ☐ Consistent with national policy
Legally Compliant ☐ Yes ☐ No

Details of Reasons for Soundess/ Legal Complaince:
The Proposed Submission Core Strategy places far too much weight on the “topographical and landscape constraints” that are said to affect the town, and far too little weight on the needs of the town in terms of its future housing and other development. While the A265 passes through the town this is not a constraint. Sites that are suitable for development as logical urban extensions are available that have perfectly adequate access. While some AONB land will need to be released, this will not have a detrimental impact on the wider landscape. The needs of the town, and the ability of the town to contribute more fully to the needs of the district as a whole are not properly recognised in the Core Strategy. 2 Additional new housing development would meet the town’s known housing needs, as well as make a significant contribution towards the shortfall of housing in the District that will occur within the plan period. The housing market in Heathfield is stronger than those settlements in the south of the District where the majority of new housing has been focussed. It will increase the demand for public transport services, and allow the existing service to be maintained and improved. 3 The Council has identified land within the AONB on the north-western side of the town for new housing development, but the number of units has been limited to 160. It is considered that this figure should be much higher, not only because the town has the services and facilities needed to serve a larger number of households, it would also help to safeguard the future vitality and viability of the town. The restrictive strategy currently proposed will only encourage dormancy in the settlement and actually harm the quality of life and standard of living of the local community in the longer term. 4 The Council has stated in is Core Strategy Background Paper in Housing Land Availability that it will assume a build-out rate of 60 dwellings per year on sites of less than 199 units (paragraph 2.7). This means that the housing on the allocated land will be completed and disposed of in just over two years. The town will then have a period of around 15 years until the end of the plan period when there will be no housing development except for a trickle of windfall sites. This cannot be a justifiable approach. 5 Figure 10 identifies land adjacent to the town that is proposed for an urban extension. The figure is inaccurate because not all of the land to the north of the A265 is open to views from the wider landscape. In fact much of this land is enclosed by hedgerows and woodland planting. There would not be any undue impact on the wider landscape from a sensitively designed development. 6 In addition, this figure excludes land to the west of the area identified for an urban extension that is not in the AONB. The land at Tilsmore lodge is accessible, and visually and physically well-contained. Any urban extension to the north of the A265 should include this land. 7 The Core Strategy is unsound as it fails to make sufficient housing provision for the town. It is also unsound because it fails to provide sufficient numbers of affordable homes. Paragraph 6.40 states that there is a current need for affordable housing for 112 households. To meet that demand from new development (based on a requirement of 35% affordable provision in Policy WCS8), a minimum of 320 new homes will be required in Heathfield to meet this current demand. Because demand is not static, there will be further need for affordable housing throughout the Core Strategy period. To achieve its delivery targets for affordable homes, the allocated number of homes for Heathfield realistically needs to be in the order of 500 + over the duration of the Core Strategy, but with a significant allocation in the early phases to meet current demand.

Details of Changes to be Made:
A minimum of 500 dwellings should be provided at Heathfield, and Figure 10 should be amended to enlarge the area for residential provision to include the land to the west.
1. The Core Strategy is not legally compliant and is unsound because of its proposals for an urban extension to the north west of Heathfield (Strategic Development Area SD11). 2. Whilst the principle of accommodating housing growth in the broad location of north west Heathfield is supported, the Core Strategy’s proposals are deficient because they: (a) fail to take a comprehensive approach to the development of this area and so are not founded on a robust and credible evidence base and are not the most appropriate strategy when considered against the reasonable alternatives in this location, thus failing the soundness test in paragraph 4.36 of PPS12 that they are “justifiable”. (b) constitute an unjustified encroachment into the High Weald AONB and so are not the most appropriate strategy when considered against the reasonable alternatives in this location, thus failing the same “justifiable” test in PPS12 and also the soundness test in paragraph 4.52 of PPS12 that they are “consistent with national policy”. Paragraph 16(v) of PPS7 requires the Council in preparing the Core Strategy to “conserve…sites of landscape…value, in accordance with statutory designations”. Paragraph 22(ii) of PPS7 requires that “major developments” should only take place within the AONB after “the most rigorous examination” and an assessment of “the scope for developing elsewhere outside the designated area or meeting the need for it in some other way”. The Council has failed to properly assess the scope for meeting the need for development on previously developed land at north west Heathfield that is not in the AONB. (c) utilise less accessible and less sustainable land and so are not the most appropriate strategy when considered against reasonable alternatives in this location, thus failing the same “justifiable” test in PPS12. (d) fail to provide adequate safeguarding of amenities of existing dwellings (if those dwellings are to be excluded from the urban extension as currently proposed) and fail to integrate into the existing urban form, thus failing the soundness test in paragraph 4.52 of PPS12 that the proposals are consistent with national policy. Paragraph 34 of PPS1 and paragraph 13 of PPS3 require the Council to reject design which is “inappropriate in its context” and paragraph 35 of PPS1 requires development to be designed so that it will be “integrated into the existing urban form and the natural and built environments”. THE PROPOSED SUBMISSION CORE STRATEGY 3. We object to the following parts of the Core Strategy. Because the objections are interconnected, we have set out all the relevant matters in this response, although this particular objection only relates to the specific part of the Core Strategy identified in our response to Q1 above. Our objections are as follows: (i) The omission from Spatial Planning Objective SPO1 of any reference to minimising the loss of nationally designated landscapes, including the High Weald AONB. Paragraph 16(v) of PPS7 requires the Council to conserve the AONB and since it is clear that the Council is proposing to meet part of the District’s development needs by using land within the AONB, the Council should establish a clear objective that only the minimum AONB land should be used for this purpose and wherever possible non-AONB land should be used in preference. (ii) The reference in Policy WCS2 to the broad locations for housing development being shown as insets on the Key Diagram. We object to the inset for Heathfield in relation to the way it shows the proposal SD11 and consequently object to this reference to that inset plan in Policy WCS2. (iii) The reference in Policy WCS4 to SD11: Land at North West of Heathfield. We object to the way that SD11 is described in Chapter 6 of the Core Strategy and shown on the Key Diagram and as a result object to the reference to SD11 in Policy WCS4. (iv) The omission from paragraph 5.8 of any aim to maximise the use of previously developed land in meeting existing and future housing needs. Notwithstanding the recent changes to PPS3 it remains a national objective to prioritise the use of previously developed land, in accordance with paragraph 21 of PPS1 and paragraph 40 of PPS3. (v) The reference in paragraph 6.40 to the identification of potential sites for housing “through the SHLAA”. We object to the inclusion of Site 155/1210 in its current form as shown in the SHLAA and consequently object to this reference to that site in paragraph 6.40. (vi) The reference in paragraph 6.41 to the “most suitable location” being “within the AONB” and that this land could be developed “without strategic adverse impact on the landscape”. The Council’s evidence base does not demonstrate that the land within the AONB is more suitable for development than the non-AONB previously developed land on High Street. There is no assessment by the Council of the suitability of this non-AONB land (which includes the objector’s land at Lavender Cottage, High Street, Heathfield, TN21 0UP) and yet it is more suitable than the AONB land, being (i) not subject to a national landscape designation, (ii) previously developed land, (iii) within the existing settlement boundary, and (iv) well related and integrated into the urban area and existing transport connections. In addition, the Council’s evidence base does not show that 160 dwellings can be provided in the AONB without strategic adverse impact on the landscape. The capacity of 160 dwellings for SD11 would appear to derive from the assumed capacity of 2 adjacent SHLAA sites at north west Heathfield (Site 155/1210 with a capacity of 123 dwellings at 40 dph and Site 307/1210 with a capacity of 35 dwellings at 35 dph). The Council’s Landscape Character Assessment (February 2009) shows at Figure 5 that large parts of these...
SHLAA sites are required to be retained as open space to provide a "landscape buffer" to Tilsmore Wood. If those buffers are to be provided as recommended in the Landscape Character Assessment, the SHLAA sites will not be able to deliver the required capacity, without radical changes to the assumed density, and there has been no assessment of the impact of higher density development on the AONB and on the landscape setting and character of Tilsmore Wood. The claim therefore that SD11 can be achieved without strategic adverse impact on the AONB is not supported by the evidence base. (vii) The reference in paragraph 6.41 to the release of AONB land being justified "as no suitable alternative non-AONB location exists". The Council’s evidence base does not substantiate this assertion. The Council has not assessed the suitability of the non-AONB land in this location which fronts High Street (including the objectors’ land at Lavender Cottage). This non-AONB land is within the settlement limits of Heathfield as identified on the Proposals Map of the saved Local Plan and paragraph 6.48 of the Core Strategy confirms that within development boundaries “the principle of development is acceptable”. The principle of redeveloping this land to provide more intensive residential development has already been accepted by the Council, with the grant of planning permissions at Brackenside (WD/08/0329) for 3 dwellings in place of 1 dwelling, and at Oaksdown/Lowlands (WD/2011/0400) for 9 apartments in the place of 2 dwellings. The more intensive development of the non-AONB land on the High Street frontage would minimise (or may even remove) the need for the use of AONB land. This option would plainly be a more suitable alternative than the use only of land “within the AONB” as proposed in the Core Strategy. (viii) The reference in paragraph 6.41 to “no suitable alternative contingency land is available”. The land at Oaksdown/Lowlands is available for development (as confirmed by the recent renewal of planning permission). The objectors’ land at Lavender Cottage is available for development (and this has been made known to the Council since at least August 2010). The land at Woodhatch is relied on as being available for development in order to provide the access for SHLAA site 155/1210. The objectors understand that the land at Holmhurst could be made available for development. Thus, there is a continuous frontage of 5 plots of non-AONB land available (all with generous areas of garden land, most of which is excluded from the AONB) just on this part of the High Street. Were the Council to actively promote a comprehensive redevelopment of this area it is likely that other land in the vicinity would be made available. However, the Council has simply failed in its evidence base to assess this option. If it is necessary to identify contingency land then the hinterland of AONB land should be identified as contingency land, with priority being given to the development of the non-AONB land on the High Street frontage. Prioritising that land would be consistent with the policy objectives of minimising the loss of AONB land and maximising the use of previously developed land. (ix) The reference in paragraph 6.42 item 3 to SD11 being “on land adjacent to the urban area”. The proposal for SD11 should not be defined in a way which excludes the urban area and which focuses only on land within the AONB. The proposal should embrace the urban area and the development should maximise the use of previously developed land in the urban area to achieve the provision of 160 dwellings before any consideration is given to the use of land in the AONB. (x) Figure 10 Heathfield Area Strategy. This diagram shows SD11 as located within the AONB and beyond the existing settlement. The diagram should not exclude the inclusion of the existing built up area in this location within the scope of SD11. The built up area has the potential and the capacity to be redeveloped and this aim should be the first priority at north west Heathfield. (xi) Key Diagram: the inset for Heathfield. The inset shows Heathfield and Proposal SD11 in the same way that they are shown on Figure 10 and they are not acceptable for the same reason set out at (x) above. 4. We now propose to elaborate on these objections. Piecemeal not comprehensive 5. SD11 takes an opportunistic approach. It utilises substantial areas of greenfield land as the main development areas (and by implication from the SHLAA one existing property simply as a means of access). Although the SHLAA indicates that Site 155/1210 is in multiple ownerships and Site 307/1210 is owned by a company with 7 shareholders, the choice of this location seems to be influenced simply by the fact that these 2 sites were promoted in the SHLAA and so it is assumed they are available. Site 155/1210 is said to be under the control of a housing developer. We are not aware whether the Council has seen the terms of any option or other legal agreement giving such control but, given that the Proposed Submission Core Strategy is a long term strategy to 2030 and its trajectory does not anticipate the site coming forward before 2015/16, little weight can be given to the status of any current contractual arrangements. 6. Any sensible spatial planning approach to the development of this area would not look at the sites promoted in the SHLAA in isolation but would look to see how that development would relate to its local context and how it would relate to the settlement it is intended to form a part of. 7. The site of SD11 is on sloping ground set back behind existing development which separates the site from the rest of Heathfield. Development as proposed will not integrate the development with its local context as required by paragraph 35 of PPS1. Nor will it maximise the opportunities for the site to benefit from clear and easy links to the facilities in the local service centre by non-car modes. 8. A comprehensive approach would look at the whole of the area in this north western part of Heathfield and then seek to identify the land which is most suited to development. It is common sense that this would start by looking at the land with the best links by foot, cycle, and public transport to the rest of the settlement. That is of course the frontage land along Heathfield Road/High Street itself. The frontage land also contains the previously developed land comprising the existing dwellings and their various outbuildings. Whilst the recent revisions to PPS3 have removed garden land from the definition of previously developed land, the footprint of the buildings and their associated driveways and hardstandings clearly have a higher priority for development than a greenfield meadow. 9. The present objectors, as the owners of Lavender Cottage, are willing to make their land available as part of a wider development. The objectors have made this known to the Council since at least August 2010. The principle of redevelopement for more intensive residential development has already been established on land to the wets (WD/08/0329) and on the adjoining site.
to the east of Lavender Cottage (WD/2011/0400). Although planning permission was granted for a block of flats (WD/2008/0276), that development has not come forward and the permission has recently had to be renewed. Clearly, the land is available for development, even if the form of development is not at present attractive to the market. We understand that the owner of the adjoining plot at Holmhurst would be prepared to make that site available. Woodhatch is relied on as available in the SHLAA (Site 155/1210 refers). Thus there is already a substantial amount of the frontland which is available for development. A spatial approach to the planning of this area would look to utilise this developed frontage land, which plainly has development potential, before turning to the undeveloped hinterland to the rear. Unjustified Encroachment into the AONB 10. The Proposed Submission Core Strategy recognises that SD11 lies within the AONB, where there is strict control over new development. Paragraph 22 of PPS7 is clear that major development in the AONB requires “the most rigorous examination” and that such development should only be accepted after assessment of the scope for meeting the need elsewhere. Under the GDMO 2010 “major development” is a development of 10 or more dwellings. Under the Secretary of State’s arrangements for the recovery of appeals on the basis that they are large/controversial, the threshold is 150 residential units. On either basis, a development of 160 dwellings is major development. In any event, the Council has accepted in the SHLAA that “there is a requirement to demonstrate development is essential to meet local needs and that other more suitable sites do not exist elsewhere” (Site 155/1210). The claimed rationale for the use of AONB land in this case is that “no suitable alternative non-AONB location exists”. This is patently incorrect. As already noted, the frontage land is not within the AONB and if the desire is to achieve a development of some 160 dwellings there can be no justification for taking more AONB land than is absolutely necessary when there is non-AONB land in the same location which is available. 11. Whilst it may be doubtful that the frontage land which is known to be available could alone accommodate the full scale of the development sought, the need to encroach into the AONB would be very much reduced if the frontage land was used first. Such an approach would also enable the lower (and least accessible) parts of the meadow to be retained as open land, potentially providing a better buffer with the important woodland at Tilsmore Wood that makes up such a key component of the Wealden character. The need for such a buffer is recognised in the Landscape Character Assessment (Figure 5). In addition, if the Council made it clear that it was promoting the comprehensive development of the area, it is likely that other owners would also wish to make their land available, and the Council may therefore be able to avoid encroaching into the AONB to any material degree. 12. The Council’s claim that 160 dwellings can be provided in the AONB without strategic adverse impact on the landscape is not supported by the evidence base. The capacity of 160 dwellings for SD11 would appear to derive from the assumed capacity of the 2 adjacent SHLAA sites: Site 155/1210 and Site 307/1210. As already noted, the Council’s Landscape Character Assessment shows (Figure 5) that large parts of these SHLAA sites are required to be retained as open space to provide a “landscape buffer” to Tilsmore Wood. If those buffers are to be provided as recommended in the Landscape Character Assessment, the SHLAA sites will not be able to deliver the required capacity, without radical changes to the assumed density, and there has been no assessment of the impact of higher density development on the AONB and on the landscape setting and character of Tilsmore Wood. The claim therefore that SD11 can be achieved without strategic adverse impact on the AONB is not supported by the evidence base. Using Less Accessible and Less Sustainable Land 13. Similar considerations in terms of minimising the amount of AONB land apply in relation to accessibility issues. The lower parts of the sloping meadow land are not only more remote by simple distance from the footways and bus route along Heathfield Road/High Street, there is also the fact that journeys from home will inevitably be uphill for residents of that area. There will therefore be a disinclination to use non-car modes for accessing local services, even if they might appear to be within walking distance. It must also be doubted whether much of the hinterland is within the preferred 400m distance for access to a bus route. 14. In contrast, the frontage development is already connected to existing pedestrian routes by the adjacent footways and there is only a shallow fall in the land closest to the roadside. Accessibility to the bus route is also much improved. 15. Again, on any sensible measure of accessibility and sustainability, it cannot make sense to use the more remote hinterland in preference to the frontage land. PPS1 is clear at paragraph 35 that new development needs to be integrated into the urban area and address connectivity issues. The choice of a backland location for SD11 when the more accessible frontland is available is directly contrary to this guidance Inadequate safeguarding of amenities 16. We have already explained why a comprehensive approach needs to be taken to this area. However, if the Council persists in its piecemeal approach then it is apparent that inadequate consideration has been given to the relationship between the retained frontage properties and the new development to the rear. The existing development is at a very low density and has the established character of a mature residential area, with individual dwellings in spacious plots. 17. The SHLAA indicates a proposed density for the new development of some 40 dwellings per hectare for Site 155/120. This will be substantially different in character and could only be achieved by ensuring a substantial buffer between the 2 very different forms of development. However, this would push the new development further into the AONB and would further separate the new development from the settlement of which it is intended to form a part. Again, there would be a conflict with the advice in PPS1 on integrating the development with the urban area. Soundness Tests 18. It is clear from the objections set out above that the proposals for SD11 are not founded on a robust and credible evidence base, cannot be shown to be the most appropriate strategy when considered against the reasonable alternatives, and are not consistent with national policy in PPS1, PPS3, and PPS7 in several important respects. They therefore fail 2 of the key tests of soundness as set out at paragraph 4.52 of PPS12. Legal Tests 19. These objections also have the consequence that the Council’s failure to properly consider reasonable alternatives to its proposals at
north west Heathfield, and in particular to consider the alternative of an area of growth in this location planned on a comprehensive basis and focused on maximising the use of previously developed land and minimising the use of land within the AONB, has the consequence that the Sustainability Appraisal/Strategic Environmental Assessment that accompanies the Core Strategy is legally deficient and the Core Strategy is consequently not legally compliant with the requirements of either Regulation 5(1) of the Environmental Assessment of Plans and Programmes Regulations 2004 or with the requirements of s.19(5) and s.20(2) Planning & Compulsory Purchase Act 2004. In addition, the same failings, together with the lack of a credible and robust evidence base to support those proposals and the conflicts with national policy mean that the Core Strategy is not “sound” as required by s.20(5)(b) PCPA 2004. 20. The SA/SEA considers, in broad terms, alternative locations for growth at Heathfield as between the north east, north west, and west of the town. However, what it fails to do is to look at reasonable alternatives within the selected north west location. It is no answer for the Council to suggest that this level of detail is a matter for a later DPD because the Core Strategy is already spatially specific that the location of north west Heathfield is an “urban extension” (i.e. an addition) and that it is “within the AONB” (i.e. outside the settlement boundary. The same spatial approach is shown on Figure 10 and on the Inset for the Key Diagram. The Council is not, therefore, able to avoid grappling with the spatial implications of this choice as part of the Core Strategy and testing it against reasonable alternatives. However, it is clear that this is not an exercise that has been attempted in the SA/SEA. 21. The Council will be well aware from the recent decision in Save Historic Newmarket Ltd v Forest Heath District Council [2011] EWHC 606 (Admin) that a failure in the SA/SEA to give proper consideration to identification and assessment of reasonable alternatives is likely to result in a quashing of the relevant parts of the Core Strategy. Conclusion 22. For all of these reasons the objectors strongly suggest that neither the Council nor the Inspector should endorse the present proposals for SD11. What is required is a fundamental rethink to achieve an integrated, sustainable and accessible development which minimises the impact on the AONB and provides a comprehensive spatial approach to the development of this area. Essentially this requires the focus to shift from the “easy target” of greenfield meadows to a more considered approach, giving priority to the previously developed frontage land, and only considering the AONB hinterland to the minimum extent necessary to achieve the required dwelling numbers.

Details of Changes to be Made:
Delete from the first sentence of paragraph 6.40, all words from “although potential sites…” onwards.
The Proposed Submission Core Strategy places far too much weight on the “topographical and landscape constraints” that are said to affect the town, and far too little weight on the needs of the town in terms of its future housing and other development. While the A265 passes through the town this is not a constraint. Sites that are suitable for development as logical urban extensions are available that have perfectly adequate access. While some AONB land will need to be released, this will not have a detrimental impact on the wider landscape. The needs of the town, and the ability of the town to contribute more fully to the needs of the district as a whole are not properly recognised in the Core Strategy. Additional new housing development would meet the town’s known housing needs, as well as make a significant contribution towards the shortfall of housing in the District that will occur within the plan period. The housing market in Heathfield is stronger than those settlements in the south of the District where the majority of new housing has been focussed. It will increase the demand for public transport services, and allow the existing service to be maintained and improved. The Council has identified land within the AONB on the north-western side of the town for new housing development, but the number of units has been limited to 160. It is considered that this figure should be much higher, not only because the town has the services and facilities needed to serve a larger number of households, it would also help to safeguard the future vitality and viability of the town. The restrictive strategy currently proposed will only encourage dormancy in the settlement and actually harm the quality of life and standard of living of the local community in the longer term. The Council has stated in is Core Strategy Background Paper in Housing Land Availability that it will assume a build-out rate of 60 dwellings per year on sites of less than 199 units (paragraph 2.7). This means that the housing on the allocated land will be completed and disposed of in just over two years. The town will then have a period of around 15 years until the end of the plan period when there will be no housing development except for a trickle of windfall sites. This cannot be a justifiable approach. Figure 10 identifies land adjacent to the town that is proposed for an urban extension. The figure is inaccurate because not all of the land to the north of the A265 is open to views from the wider landscape. In fact much of this land is enclosed by hedgerows and woodland planting. There would not be any undue impact on the wider landscape from a sensitively designed development. In addition, this figure excludes land to the west of the area identified for an urban extension that is not in the AONB. The land at Tilsmore lodge is accessible, and visually and physically well-contained. Any urban extension to the north of the A265 should include this land. The Core Strategy is unsound as it fails to make sufficient housing provision for the town. It is also unsound because it fails to provide sufficient numbers of affordable homes. Paragraph 6.40 states that there is a current need for affordable housing for 112 households. To meet that demand from new development (based on a requirement of 35% affordable provision in Policy WCS8), a minimum of 320 new homes will be required in Heathfield to meet this current demand. Because demand is not static, there will be further need for affordable housing throughout the Core Strategy period. To achieve its delivery targets for affordable homes, the allocated number of homes for Heathfield realistically needs to be in the order of 500 + over the duration of the Core Strategy, but with a significant allocation in the early phases to meet current demand. A minimum of 500 dwellings should be provided at Heathfield, and Figure 10 should be amended to enlarge the area for residential provision to include the land to the west.
1. The Proposed Submission Core Strategy places far too much weight on the "topographical and landscape constraints" that are said to affect the town, and far too little weight on the needs of the town in terms of its future housing and other development. While the A265 passes through the town this is not a constraint. Sites that are suitable for development as logical urban extensions are available that have perfectly adequate access. While some AONB land would need to be released, this will not have a detrimental impact on the wider landscape. The needs of the town, and the ability of the town to contribute more fully to the needs of the District as a whole are not adequately recognised in the Core Strategy. 2. Additional new housing development would meet the town's known housing needs, as well as making a significant contribution towards the shortfall of housing in the District that will occur within the plan period. The housing market in Heathfield is stronger than those settlements in the south of the District where the majority of new housing has been focussed. Heathfield needs higher levels of new housing to provide more buoyancy in the market and choice for residents which will in turn avoid outward migration from the town and the risk of declining services and social infrastructure. A higher housing allocation will increase the demand for public transport services and future provision and allow the existing service to be maintained and improved. 3. The Council have identified land within the AONB on the north-western side of the town for new housing development, but the number of units has been limited to 160. It is considered that this figure should be much higher, not only because the town has the services and facilities needed to serve a larger number of households, but it would also help to safeguard the future vitality and viability of the town. The restrictive strategy currently proposed will only encourage dormancy in the settlement and actually harm the quality of life and standard of living of the local community in the longer term. 4. The Council has stated in its Core Strategy Background Paper in Housing Land Availability that it will assume a build-out rate of 60 dwellings per year on sites of less than 199 units (paragraph 2.7). This means that the housing on the allocated land will be completed and disposed of in just over two years. The town will then have a period of around 15 years until the end of the plan period when there will be no housing development except for a possible trickle of windfall sites. This cannot be a supportable approach. 5. Figure 10 identifies land adjacent to the town that is proposed for an urban extension. The figure is inaccurate because not all of the land to the north of the A265 is open to views from the wider landscape. In fact much of this land is enclosed by hedgerows and woodland planting. There would not be any undue impact on the wider landscape from a sensitively designed development. Similarly land adjoining the eastern settlement boundary has limited visual and landscape constraints which is explained in the submitted Landscape Character and Visual Impact Report. 6. The Core Strategy is unsound as it fails to make sufficient housing provision for the town. It is also unsound because it fails to provide sufficient numbers of affordable homes. paragraph 6.40 states that there is a current need for affordable housing for 112 households. To meet that demand from new development (based on a requirement of 35% affordable provision in Policy WCS8) a minimum of 320 new homes will be required in Heathfield to meet this current demand. Because demand is not static there will be further need for affordable housing throughout the Core Strategy period. To achieve its delivery targets for affordable homes, the allocated number of homes for Heathfield realistically needs to be in the order of 500+ over the duration of the Core Strategy, but with a significant allocation in the early phases to meet current demand.

## Details of Changes to be Made:

7. Land to the east of the town has been put forward for inclusion in earlier incarnations of the Core Strategy, principally SHLAA sites 258/1210; and 259/1210 on the norther side of the A265 and additionally SHLAA sites 260/1210; 275/1210 and 299/11210 on the southern side of the A265. The land is available and can deliver highway improvements, new homes, open space and community provision at an early stage in a comprehensive approach. The Core Strategy is simply wrong at paragraph 6.41 where it states that there are no suitable alternative sites available. The above are sites that are demonstrably available and suitable as the submitted supporting reports clearly indicate. This land is favoured by the Parish Council for development and if allocated for in the order of 250 new homes, existing highway constraint would be addressed and contributions secured to provide social and community provision (such as the needed swimming pool identified at paragraph 6.39). This can be achieved at this scale and level of development but would not achieve these objectives at the level proposed in the Core Strategy. New housing at the proposed level will maintain the town’s future vitality and economic wellbeing and will help to maintain local services and avoid the prospects of Heathfield being starved of investment and resources in the future, with the very real risk that present services will decline, and for the town to simply become no more than a commuter town for the larger centres of Tunbridge Wells, Eastbourne and beyond.
Details of Reasons for Soundess/ Legal Complaince:

This comment is an expansion of my earleir comment id 283. I have already set out in another comment (282) that the proposed Core Strategy does not meet the legal requirement of the South East Regional Plan for at least 11,000 new dwellings between 2006 and 2026. Neither does the proposed Core Stragey meet the housing demand predicted by the Office of National Statistics of the need for 16,900 new dwellings between 2006 and 2030. A greater expansion of Heathfield than currently set out would contribute to filling the gap. Specifically regarding the plans for Heathfield. 1. The Core Strategy needs: to include a contingency site for the single site currently proposed; to meet the local demand for affordable housing demonstrated by the current Council waiting list; and also to provide for some of the currently proposed shortfall in new dwellings in Wealden as a whole as set out above. 2. The currently proposed Core Strategy has failed to recognise the social and economic consequences of minimising dwelling allocations to Heathfield just because of its environmental constraints - which is in no way justified. Wealden District Council has had no regard for PPS7 (Sustainable Development in Rural Areas) which provides National Planning Policy on development in AONB locations. 3. In the SHLAA published October 2010, there is a site in Heathfield at Tilsmore off Ghyll Road (site ref 149/1210) suitable to be included for development in the Core Strategy once taking into account points 1 and 2 above. This site was included in an earlier short list because it is very close to Heatfield's schools, shops and recreation. The reasons given for exclusion are related to traffic and the narrowness of some roads but this can be overcome with some minor redesign of the road layout which could be incorporated into the Core Strategy. The demand for new local housing in Heathfield and Wealden as a whole demonstrate that this is an essential local need which outweighs the AONB aspect.

Details of Changes to be Made:

In the SHLAA published October 2010, there is a site in Heathfield at Tilsmore off Ghyll Road (site ref 149/1210) suitable to be included for development in the Core Strategy once taking into account points 1 and 2 above. This site was included in an earlier short list because it is very close to Heatfield's schools, shops and recreation. The reasons given for exclusion are related to traffic and the narrowness of some roads but this can be overcome with some minor redesign of the road layout which could be incorporated into the Core Strategy. The demand for new local housing in Heathfield and Wealden as a whole demonstrate that this is an essential local need which outweighs the AONB aspect.
The Core Strategy is not legally compliant and is unsound because of its proposals for an urban extension to the north west of Heathfield (Strategic Development Area SD11). Whilst the principle of accommodating housing growth in the broad location of north west Heathfield is supported, the Core Strategy’s proposals are deficient because they: (a) fail to take a comprehensive approach to the development of this area and so are not founded on a robust and credible evidence base and are not the most appropriate strategy when considered against the reasonable alternatives in this location, thus failing the soundness test in paragraph 4.36 of PPS12 that they are “justifiable”. (b) constitute an unjustified encroachment into the High Weald AONB and so are not the most appropriate strategy when considered against the reasonable alternatives in this location, thus failing the same “justifiable” test in PPS12 and also the soundness test in paragraph 4.52 of PPS12 that they are “consistent with national policy”. Paragraph 16(v) of PPS7 requires the Council in preparing the Core Strategy to “conserve…sites of landscape…value, in accordance with statutory designations”. Paragraph 22(ii) of PPS7 requires that “major developments” should only take place within the AONB after “the most rigorous examination” and an assessment of “the scope for developing elsewhere outside the designated area or meeting the need for it in some other way”. The Council has failed to properly assess the scope for meeting the need for development on previously developed land at north west Heathfield that is not in the AONB. (c) utilise less accessible and less sustainable land and so are not the most appropriate strategy when considered against reasonable alternatives in this location, thus failing the same “justifiable” test in PPS12. (d) fail to provide adequate safeguarding of amenities of existing dwellings (if those dwellings are to be excluded from the urban extension as currently proposed) and fail to integrate into the existing urban form, thus failing the soundness test in paragraph 4.52 of PPS12 that the proposals are consistent with national policy. Paragraph 34 of PPS1 and paragraph 13 of PPS3 require the Council to reject design which is “inappropriate in its context” and paragraph 35 of PPS1 requires development to be designed so that it will be “integrated into the existing urban form and the natural and built environments”. THE PROPOSED SUBMISSION CORE STRATEGY 3. We object to the following parts of the Core Strategy. Because the objections are interconnected, we have set out all the relevant matters in this response, although this particular objection only relates to the specific part of the Core Strategy identified in our response to Q1 above. Our objections are as follows: (i) The omission from Spatial Planning Objective SPO1 of any reference to minimising the loss of nationally designated landscapes, including the High Weald AONB. Paragraph 16(v) of PPS7 requires the Council to conserve the AONB and since it is clear that the Council is proposing to meet part of the District’s development needs by using land within the AONB, the Council should establish a clear objective that only the minimum AONB land should be used for this purpose and wherever possible non-AONB land should be used in preference. (ii) The reference in Policy WCS2 to the broad locations for housing development being shown as insets on the Key Diagram. We object to the inset for Heathfield in relation to the way it shows the proposal SD11 and consequently object to this reference to that inset plan in Policy WCS2. (iii) The reference in Policy WCS4 to SD11: Land at North West of Heathfield. We object to the way that SD11 is described in Chapter 6 of the Core Strategy and shown on the Key Diagram and as a result object to the reference to the proposal to SD11 in Policy WCS4. (iv) The omission from paragraph 5.8 of any aim to maximise the use of previously developed land in meeting existing and future housing needs. Notwithstanding the recent changes to PPS3 it remains a national objective to prioritise the use of previously developed land, in accordance with paragraph 21 of PPS1 and paragraph 40 of PPS3. (v) The reference in paragraph 6.40 to the identification of potential sites for housing “through the SHLAA”. We object to the inclusion of Site 155/1210 in its current form as shown in the SHLAA and consequently object to this reference to that site in paragraph 6.40. (vi) The reference in paragraph 6.41 to the “most suitable location” being “within the AONB” and that this land could be developed “without strategic adverse impact on the landscape”. The Council’s evidence base does not demonstrate that the land within the AONB is more suitable for development than the non-AONB previously developed land on High Street. There is no assessment by the Council of the suitability of this non-AONB land (which includes the objector’s land at Lavender Cottage, High Street, Heathfield, TN21 0UP) and yet it is more suitable than the AONB land, being (i) not subject to a national landscape designation, (ii) previously developed land, (iii) within the existing settlement boundary, and (iv) well related and integrated into the urban area and existing transport connections. In addition, the Council’s evidence base does not show that 160 dwellings can be provided in the AONB without strategic adverse impact on the landscape. The capacity of 160 dwellings for SD11 would appear to derive from the assumed capacity of 2 adjacent SHLAA sites at north west Heathfield (Site 155/1210 with a capacity of 123 dwellings at 40 dph and Site 307/1210 with a capacity of 35 dwellings at 35 dph). The Council’s Landscape Character Assessment (February 2009) shows at Figure 5 that large parts of these
SHLAA sites are required to be retained as open space to provide a “landscape buffer” to Tilsmore Wood. If those buffers are to be provided as recommended in the Landscape Character Assessment, the SHLAA sites will not be able to deliver the required capacity, without radical changes to the assumed density, and there has been no assessment of the impact of higher density development on the AONB and on the landscape setting and character of Tilsmore Wood. The claim therefore that SD11 can be achieved without strategic adverse impact on the AONB is not supported by the evidence base. (vii) The reference in paragraph 6.41 to the release of AONB land being justified “as no suitable alternative non-AONB location exists”. The Council’s evidence base does not substantiate this assertion. The Council has not assessed the suitability of the non-AONB land in this location which fronts High Street (including the objectors’ land at Lavender Cottage). This non-AONB land is within the settlement limits of Heathfield as identified on the Proposals Map of the saved Local Plan and paragraph 6.48 of the Core Strategy confirms that within development boundaries “the principle of development is acceptable”. The principle of redeveloping this land to provide more intensive residential development has already been accepted by the Council, with the grant of planning permissions at Brackenside (WD/08/0329) for 3 dwellings in place of 1 dwelling, and at Oaksdown/Lowlands (WD/2011/0400) for 9 apartments in the place of 2 dwellings. The more intensive development of the non-AONB land on the High Street frontage would minimise (or may even remove) the need for the use of AONB land. This option would plainly be a more suitable alternative than the use only of land “within the AONB” as proposed in the Core Strategy. (viii) The reference in paragraph 6.41 to “no suitable alternative contingency land is available”. The land at Oaksdown/Lowlands is available for development (as confirmed by the recent renewal of planning permission). The objectors’ land at Lavender Cottage is available for development (and this has been made known to the Council since at least August 2010). The land at Woodhatch is relied on as being available for development in order to provide the access for SHLAA site 155/1210. The objectors understand that the land at Holmhurst could be made available for development. Thus, there is a continuous frontage of 5 plots of non-AONB land available (all with generous areas of garden land, most of which is excluded from the AONB) just on this part of the High Street. Were the Council to actively promote a comprehensive redevelopment of this area it is likely that other land in the vicinity would be made available. However, the Council has simply failed in its evidence base to assess this option. If it is necessary to identify contingency land then the hinterland of AONB land should be identified as contingency land, with priority being given to the development of the non-AONB land on the High Street frontage. Prioritising that land would be consistent with the policy objectives of minimising the loss of AONB land and maximising the use of previously developed land. (ix) The reference in paragraph 6.42 item 3 to SD11 being “on land adjacent to the urban area”. The proposal for SD11 should not be defined in a way which excludes the urban area and which focuses only on land within the AONB. The proposal should embrace the urban area and the development should maximise the use of previously developed land in the urban area to achieve the provision of 160 dwellings before any consideration is given to the use of land in the AONB. (x) Figure 10 Heathfield Area Strategy. This diagram shows SD11 as located within the AONB and beyond the existing settlement. The diagram should not include the inclusion of the existing built up area in this location within the scope of SD11. The built up area has the potential and the capacity to be redeveloped and this aim should be the first priority at north west Heathfield. (xi) Key Diagram: the inset for Heathfield. The inset shows Heathfield and Proposal SD11 in the same way that they are shown on Figure 10 and they are not acceptable for the same reason set out at (x) above. 4. We now propose to elaborate on these objections. Piecemeal not comprehensive 5. SD11 takes an opportunistic approach. It utilises substantial areas of greenfield land as the main development areas (and by implication from the SHLAA one existing property simply as a means of access). Although the SHLAA indicates that Site 155/1210 is in multiple ownerships and Site 307/1210 is owned by a company with 7 shareholders, the choice of this location seems to be influenced simply by the fact that these 2 sites were promoted in the SHLAA and so it is assumed they are available. Site 155/1210 is said to be under the control of a housing developer. We are not aware whether the Council has seen the terms of any option or other legal agreement giving such control but, given that the Proposed Submission Core Strategy is a long term strategy to 2030 and its trajectory does not anticipate the site coming forward before 2015/16, little weight can be given to the status of any current contractual arrangements. 6. Any sensible spatial planning approach to the development of this area would not look at the sites promoted in the SHLAA in isolation but would look to see how that development would relate to its local context and how it would relate to the settlement it is intended to form a part of. 7. The site of SD11 is on sloping ground set back behind existing development which separates the site from the rest of Heathfield. Development as proposed will not integrate the development with its local context as required by paragraph 35 of PPS1. Nor will it maximise the opportunities for the site to benefit from clear and easy links to the facilities in the local service centre by non-car modes. 8. A comprehensive approach would look at the whole of the area in this north western part of Heathfield and then seek to identify the land which is most suited to development. It is common sense that this would start by looking at the land with the best links by foot, cycle, and public transport to the rest of the settlement. That is of course the frontage land along Heathfield Road/High Street itself. The frontage land also contains the previously developed land comprising the existing dwellings and their various outbuildings. Whilst the recent revisions to PPS3 have removed garden land from the definition of previously developed land, the footprint of the buildings and their associated driveways and hardstandings clearly have a higher priority for development than a greenfield meadow. 9. The present objectors, as the owners of Lavender Cottage, are willing to make their land available as part of a wider development. The objectors have made this known to the Council since at least August 2010. The principle of redevelopement for more intensive residential development has already been established on land to the wets (WD/08/0329) and on the adjoining site.
to the east of Lavender Cottage (WD/2011/0400). Although planning permission was granted for a block of flats (WD/2008/0276), that development has not come forward and the permission has recently had to be renewed. Clearly, the land is available for development, even if the form of development is not at present attractive to the market. We understand that the owner of the adjoining plot at Holmhurst would be prepared to make that site available. Woodhatch is relied on as available in the SHLAA (Site 155/1210 refers). Thus there is already a substantial amount of the frontage land which is available for development. A spatial approach to the planning of this area would look to utilise this developed frontage land, which plainly has development potential, before turning to the undeveloped hinterland to the rear. Unjustified Encroachment into the AONB 10. The Proposed Submission Core Strategy recognises that SD11 lies within the AONB, where there is strict control over new development. Paragraph 22 of PPS7 is clear that major development in the AONB requires “the most rigorous examination” and that such development should only be accepted after assessment of the scope for meeting the need elsewhere. Under the GDMO 2010 “major development” is a development of 10 or more dwellings. Under the Secretary of State’s arrangements for the recovery of appeals on the basis that they are large/controversial, the threshold is 150 residential units. On either basis, a development of 160 dwellings is major development. In any event, the Council has accepted in the SHLAA that “there is a requirement to demonstrate development is essential to meet local needs and that other more suitable sites do not exist elsewhere” (Site 155/1210). The claimed rationale for the use of AONB land in this case is that “no suitable alternative non-AONB location exists”. This is patentely incorrect. As already noted, the frontage land is not within the AONB and if the desire is to achieve a development of some 160 dwellings there can be no justification for taking more AONB land than is absolutely necessary when there is non-AONB land in the same location which is available. 11. Whilst it may be doubtful that the frontage land which is known to be available could alone accommodate the full scale of the development sought, the need to encroach into the AONB would be very much reduced if the frontage land was used first. Such an approach would also enable the lower (and least accessible) parts of the meadow to be retained as open land, potentially providing a better buffer with the important woodland at Tilsmore Wood that makes up such a key component of the Wealden character. The need for such a buffer is recognised in the Landscape Character Assessment (Figure 5). In addition, if the Council made it clear that it was promoting the comprehensive development of the area, it is likely that other owners would also wish to make their land available, and the Council may therefore be able to avoid encroaching into the AONB to any material degree. 12. The Council’s claim that 160 dwellings can be provided in the AONB without strategic adverse impact on the landscape is not supported by the evidence base. The capacity of 160 dwellings for SD11 would appear to derive from the assumed capacity of the 2 adjacent SHLAA sites:Site 155/1210 and Site 307/1210. As already noted, the Council’s Landscape Character Assessment shows (Figure 5) that large parts of these SHLAA sites are required to be retained as open space to provide a “landscape buffer” to Tilsmore Wood. If those buffers are to be provided as recommended in the Landscape Character Assessment, the SHLAA sites will not be able to deliver the required capacity, without radical changes to the assumed density, and there has been no assessment of the impact of higher density development on the AONB and on the landscape setting and character of Tilsmore Wood. The claim therefore that SD11 can be achieved without strategic adverse impact on the AONB is not supported by the evidence base. Using Less Accessible and Less Sustainable Land 13. Similar considerations in terms of minimising the amount of AONB land apply in relation to accessibility issues. The lower parts of the sloping meadow land are not only more remote by simple distance from the footways and bus route along Heathfield Road/High Street, there is also the fact that journeys from home will inevitably be uphill for residents of that area. There will therefore be a disinclination to use non-car modes for accessing local services, even if they might appear to be within walking distance. It must also be doubted whether much of the hinterland is within the preferred 400m distance for access to a bus route. 14. In contrast, the frontage development is already connected to existing pedestrian routes by the adjacent footways and there is only a shallow fall in the land closest to the roadside. Accessibility to the bus route is also much improved. 15. Again, on any sensible measure of accessibility and sustainability, it cannot make sense to use the more remote hinterland in preference to the frontage land. PPS1 is clear at paragraph 35 that new development needs to be integrated into the urban area and address connectivity issues. The choice of a backland location for SD11 when the more accessible frontage land is available is directly contrary to this guidance. Inadequate safeguarding of amenities 16. We have already explained why a comprehensive approach needs to be taken to this area. However, if the Council persists in its piecemeal approach then it is apparent that inadequate consideration has been given to the relationship between the retained frontage properties and the new development to the rear. The existing development is at a very low density and has the established character of a mature residential area, with individual dwellings in spacious plots. 17. The SHLAA indicates a proposed density for the new development of some 40 dwellings per hectare for Site 155/120. This will be substantially different in character and could only be achieved by ensuring a substantial buffer between the 2 very different forms of development. However, this would push the new development further into the AONB and would further separate the new development from the settlement of which it is intended to form a part. Again, there would be a conflict with the advice in PPS1 on integrating the development with the urban area. Soundness Tests 18. It is clear from the objections set out above that the proposals for SD11 are not founded on a robust and credible evidence base, cannot be shown to be the most appropriate strategy when considered against the reasonable alternatives, and are not consistent with national policy in PPS1, PPS3, and PPS7 in several important respects. They therefore fail 2 of the key tests of soundness as set out at paragraph 4.52 of PPS12. Legal Tests 19. These objections also have the consequence that the Council’s failure to properly consider reasonable alternatives to its proposals at
north west Heathfield, and in particular to consider the alternative of an area of growth in this location planned on a comprehensive basis and focused on maximising the use of previously developed land and minimising the use of land within the AONB, has the consequence that the Sustainability Appraisal/Strategic Environmental Assessment that accompanies the Core Strategy is legally deficient and the Core Strategy is consequently not legally compliant with the requirements of either Regulation 5(1) of the Environmental Assessment of Plans and Programmes Regulations 2004 or with the requirements of s.19(5) and s.20(2) Planning & Compulsory Purchase Act 2004. In addition, the same failings, together with the lack of a credible and robust evidence base to support those proposals and the conflicts with national policy mean that the Core Strategy is not “sound” as required by s.20(5)(b) PCPA 2004. 20. The SA/SEA considers, in broad terms, alternative locations for growth at Heathfield as between the north east, north west, and west of the town. However, what it fails to do is to look at reasonable alternatives within the selected north west location. It is no answer for the Council to suggest that this level of detail is a matter for a later DPD because the Core Strategy is already spatially specific that the location of north west Heathfield is an “urban extension” (i.e. an addition) and that it is “within the AONB” (i.e. outside the settlement boundary. The same spatial approach is shown on Figure 10 and on the Inset for the Key Diagram. The Council is not, therefore, able to avoid grappling with the spatial implications of this choice as part of the Core Strategy and testing it against reasonable alternatives. However, it is clear that this is not an exercise that has been attempted in the SA/SEA. 21. The Council will be well aware from the recent decision in Save Historic Newmarket Ltd v Forest Heath District Council [2011] EWHC 606 (Admin) that a failure in the SA/SEA to give proper consideration to identification and assessment of reasonable alternatives is likely to result in a quashing of the relevant parts of the Core Strategy. Conclusion 22. For all of these reasons the objectors strongly suggest that neither the Council nor the Inspector should endorse the present proposals for SD11. What is required is a fundamental rethink to achieve an integrated, sustainable and accessible development which minimises the impact on the AONB and provides a comprehensive spatial approach to the development of this area. Essentially this requires the focus to shift from the “easy target” of greenfield meadows to a more considered approach, giving priority to the previously developed frontage land, and only considering the AONB hinterland to the minimum extent necessary to achieve the required dwelling numbers.

Details of Changes to be Made:
Change paragraph 6.41 to read: “The most suitable location for housing lies at the north west of the town where access to the town center is good and bus routes exist. The location includes the existing developed frontage along Heathfield Road/High Street and there is some potential for the use of some of the AONB land to the rear, provided that the use of previously developed land is maximised and the use of AONB land is minimised. A comprehensive approach to development is required to achieve an accessible and sustainable development that is well integrated into the existing settlement and avoids significant adverse impact on the AONB. The release of some AONB land to meet local needs may be justified if the necessary scale of provision cannot be achieved from the previously developed land alone. The AONB land may be identified as a contingency if not all of the previously developed land comes forward.”
Summary of all Representations - Proposed Submission Core Strategy Regulation 27 - Report 11th July 2011

Representation ID
1497

Person ID  Mr  Williams
103948  Kember Loudon Williams

Agent ID  6.41

Paragraph

Sound  No  Yes  Justified  Effective  Consistent with national policy

Legally Compliant

Details of Reasons for Soundness/ Legal Complaince:

1. The Proposed Submission Core Strategy places far too much weight on the "topographical and landscape constraints" that are said to affect the town, and far too little weight on the needs of the town in terms of its future housing and another development. While the A265 passes through the town this is not a constraint. Sites that are suitable for development as logical urban extensions are available that have perfectly adequate access. While some AONB land will need to be released, this will not have a detrimental impact on the wider landscape. The needs of the town, and the ability of the town to contribute more fully to the needs of the District as a whole are not adequately recognised in the Core Strategy. 2. Additional new housing development would meet the town's known housing needs, as well as making a significant contribution towards the shortfall of housing in the District that will occur within the plan period. The housing market in Heathfield is stronger than those settlements in the south of the District where the majority of new housing has been focussed. Heathfield need higher levels of new housing to provide more buoyancy in the market and choice for residents which will in turn avoid outward migration from the town and the risk of declining services and social infrastructure. A higher housing allocation will increase the demand for public transport services and future provision and allow the existing service to be maintained and improved. 3. The Council has identified land within the AONB on the north-western side of the town for new housing development, but the number of units has been limited to 160. It is considered that this figure should be much higher, not only because the town has the services and facilities needed to serve a larger number of households, but it would also help to safeguard the future vitality and viability of the town. The restrictive strategy currently proposed will only encourage dormancy in the settlement and actually harm the quality of life and standard of living of the local community in the longer term. 4. The Council has stated in its Core Strategy Background Paper in Housing Land Availability that it will assume a build-out rate of 60 dwellings per year on sites of less than 199 units (paragraph 2.7). This means that the housing on the allocated land will be completed and disposed of in just over two years. The town will then have a period of around 15 years until the end of the plan period when there will be no housing development except for a possible trickle of windfall sites. This cannot be a supportable approach. 5. Figure 10 identifies land adjacent to the town that is proposed for an urban extension. The figure is inaccurate because not all of the land to the north of the A265 is open to views from the wider landscape. In fact much of this land is enclosed by hedgerows and woodland planting. There would not be any undue impact on the wider landscape from a sensitively designed development. Similarly land adjoining the eastern settlement boundary has limited visual and landscape constraints which is explained in the submitted Landscape Character and Visual Impact Report. 6. The Core Strategy is unsound as it fails to make sufficient housing provision for the town. It is also unsound because it fails to provide sufficient numbers of affordable homes. paragraph 6.40 states that there is a current need for affordable housing for 112 households. to meet that demand from new development (based on a requirement of 35% affordable provision in Policy WCS8) a minimum of 320 new homes will be required in Heathfield to meet this current demand. Because demand is not static there will be further need for affordable housing throughout the Core Strategy period. To achieve its delivery targets for affordable homes, the allocated number of homes for Heathfield realistically needs to be in the order of 500+ over the duration of the Core Strategy, but with a significant allocation in the early phases to meet current demand. Due to the size of additional appendices they have not been uploaded but are available to view at the Council's offices.

Details of Changes to be Made:

7. Land to the east of the town has been put forward for inclusion in earlier incarnations of the Core Strategy, principally SLHAA sites 258/1210; and 259/1210 on the norther side of the A265 and additionally SLHAA sites 260/1210; 275/1210 and 299/11210 on the southern side of the A265. The land is available and can deliver highway improvements, new homes, open space and community provision at an early stage in a comprehensive approach. The Core Strategy is simply wrong at paragraph 6.41 where it states that there are no suitable alternative sites available. The above are sites that are demonstrably available and suitable as the submitted supporting reports clearly indicate. This land is favoured by the Parish Council for development and if allocated for in the order of 250 new homes, existing highway constraint would be addressed and contributions secured to provide social and community provision (such as the needed swimming pool identified at paragraph 6.39). This can be achieved at this scale and level of development but would not achieve these objectives at the level proposed in the Core Strategy. New housing at the proposed level will maintain the town's future vitality and economic wellbeing and will help to maintain local services and avoid the prospects of Heathfield being starved of investment and resources in the future, with the very real risk that present services will decline, and for the town to
Details of Reasons for Soundess/ Legal Complaince:
The Proposed Submission Core Strategy places far too much weight on the “topographical and landscape constraints” that are said to affect the town, and far too little weight on the needs of the town in terms of its future housing and other development. While the A265 passes through the town this is not a constraint. Sites that are suitable for development as logical urban extensions are available that have perfectly adequate access. While some AONB land will need to be released, this will not have a detrimental impact on the wider landscape. The needs of the town, and the ability of the town to contribute more fully to the needs of the district as a whole are not properly recognised in the Core Strategy. Additional new housing development would meet the town’s known housing needs, as well as make a significant contribution towards the shortfall of housing in the District that will occur within the plan period. The housing market in Heathfield is stronger than those settlements in the south of the District where the majority of new housing has been focussed. It will increase the demand for public transport services, and allow the existing service to be maintained and improved. The Council has identified land within the AONB on the north-western side of the town for new housing development, but the number of units has been limited to 160. It is considered that this figure should be much higher, not only because the town has the services and facilities needed to serve a larger number of households, it would also help to safeguard the future vitality and viability of the town. The restrictive strategy currently proposed will only encourage dormancy in the settlement and actually harm the quality of life and standard of living of the local community in the longer term. The Council has stated in is Core Strategy Background Paper in Housing Land Availability that it will assume a build-out rate of 60 dwellings per year on sites of less than 199 units (paragraph 2.7). This means that the housing on the allocated land will be completed and disposed of in just over two years. The town will then have a period of around 15 years until the end of the plan period when there will be no housing development except for a trickle of windfall sites. This cannot be a justifiable approach. Figure 10 identifies land adjacent to the town that is proposed for an urban extension. The figure is inaccurate because not all of the land to the north of the A265 is open to views from the wider landscape. In fact much of this land is enclosed by hedgerows and woodland planting. There would not be any undue impact on the wider landscape from a sensitively designed development. In addition, this figure excludes land to the west of the area identified for an urban extension that is not in the AONB. The land at Tilsmore lodge is accessible, and visually and physically well-contained. Any urban extension to the north of the A265 should include this land. The Core Strategy is unsound as it fails to make sufficient housing provision for the town. It is also unsound because it fails to provide sufficient numbers of affordable homes. Paragraph 6.40 states that there is a current need for affordable housing for 112 households. To meet that demand from new development (based on a requirement of 35% affordable provision in Policy WCS8), a minimum of 320 new homes will be required in Heathfield to meet this current demand. Because demand is not static, there will be further need for affordable housing throughout the Core Strategy period. To achieve its delivery targets for affordable homes, the allocated number of homes for Heathfield realistically needs to be in the order of 500 over the duration of the Core Strategy, but with a significant allocation in the early phases to meet current demand.

Details of Changes to be Made:
A minimum of 500 dwellings should be provided at Heathfield, and Figure 10 should be amended to enlarge the area for residential provision to include the land to the west.
Paragraph 6.41

Details of Reasons for Soundess/ Legal Complaince:

Policies to restrain traffic, obtain modal shift in travel, reducing need to travel and improve the experience of non-car travel need to be sharpened and focused. Aspirations for these to happen must have necessary circumstances incorporated into the policies.

Details of Changes to be Made:

Demand management techniques for traffic in Hailsham (6.15) should be included in all the related and equivalent policies. There should be a definite commitment to traffic reduction measures and targets throughout the Strategy Plan document.

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Paragraph 6.41

Details of Reasons for Soundess/ Legal Complaince:

The plans for Heathfield need to include a contingency for both the single site currently proposed and also for a greater number of houses to be built to meet local demand evidenced by the Council waiting list for affordable housing. This is particularly required since the Wealden District plan does not currently allow for sufficient new houses to meet the legal requirement nor the expected demand.

Details of Changes to be Made:

There is a suitable site for additional housing at Tilsmore off Ghyll Road, Heathfield within easy walking distance of schools and the town centre shops which was included in the initial SHLAA but was later excluded on the assumption that the road system would remain unchanged over the next 20 years, which is unlikely.

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Paragraph 6.41

Details of Reasons for Soundess/ Legal Complaince:

The Parish Council understands the constraints against development in Heathfield but consider that the existing allocation of 160 houses may be too small a number to ensure the long-term success and economic vitality of the town. It is considered that the site identified at SD11 could be brought forward in the timetable and that consideration be given to additional means of meeting the existing requirements for affordable housing in the parish.

Details of Changes to be Made:
The Core Strategy is not legally compliant and is unsound because of its proposals for an urban extension to the north west of Heathfield (Strategic Development Area SD11). Whilst the principle of accommodating housing growth in the broad location of north west Heathfield is supported, the Core Strategy’s proposals are deficient because they: (a) fail to take a comprehensive approach to the development of this area and so are not founded on a robust and credible evidence base and are not the most appropriate strategy when considered against the reasonable alternatives in this location, thus failing the soundness test in paragraph 4.36 of PPS12 that they are “justifiable”. (b) constitute an unjustified encroachment into the High Weald AONB and so are not the most appropriate strategy when considered against the reasonable alternatives in this location, thus failing the same “justifiable” test in PPS12 and also the soundness test in paragraph 4.52 of PPS12 that they are “consistent with national policy”. Paragraph 16(v) of PPS7 requires the Council in preparing the Core Strategy to “conserve...sites of landscape...value, in accordance with statutory designations”. Paragraph 22(ii) of PPS7 requires that “major developments” should only take place within the AONB after “the most rigorous examination” and an assessment of “the scope for developing elsewhere outside the designated area or meeting the need for it in some other way”. The Council has failed to properly assess the scope for meeting the need for development on previously developed land at north west Heathfield that is not in the AONB. (c) utilise less accessible and less sustainable land and so are not the most appropriate strategy when considered against reasonable alternatives in this location, thus failing the same “justifiable” test in PPS12. (d) fail to provide adequate safeguarding of amenities of existing dwellings (if those dwellings are to be excluded from the urban extension as currently proposed) and fail to integrate into the existing urban form, thus failing the soundness test in paragraph 4.52 of PPS12 that the proposals are consistent with national policy. Paragraph 34 of PPS1 and paragraph 13 of PPS3 require the Council to reject design which is “inappropriate in its context” and paragraph 35 of PPS1 requires development to be designed so that it will be “integrated into the existing urban form and the natural and built environments”. THE PROPOSED SUBMISSION CORE STRATEGY 3. We object to the following parts of the Core Strategy. Because the objections are interconnected, we have set out all the relevant matters in this response, although this particular objection only relates to the specific part of the Core Strategy identified in our response to Q1 above. Our objections are as follows: (i) The omission from Spatial Planning Objective SPO1 of any reference to minimising the loss of nationally designated landscapes, including the High Weald AONB. Paragraph 16(v) of PPS7 requires the Council to conserve the AONB and since it is clear that the Council is proposing to meet part of the District’s development needs by using land within the AONB, the Council should establish a clear objective that only the minimum AONB land should be used for this purpose and wherever possible non-AONB land should be used in preference. (ii) The reference in Policy WCS2 to the broad locations for housing development being shown as insets on the Key Diagram. We object to the inset for Heathfield in relation to the way it shows the proposal SD11 and consequently object to this reference to that inset plan in Policy WCS2. (iii) The reference in Policy WCS4 to SD11: Land at North West of Heathfield. We object to the way that SD11 is described in Chapter 6 of the Core Strategy and shown on the Key Diagram and as a result object to the reference to SD11 in Policy WCS4. (iv) The omission from paragraph 5.8 of any aim to maximise the use of previously developed land in meeting existing and future housing needs. Notwithstanding the recent changes to PPS3 it remains a national objective to prioritise the use of previously developed land, in accordance with paragraph 21 of PPS1 and paragraph 40 of PPS3. (v) The reference in paragraph 6.40 to the identification of potential sites for housing “through the SHLAA”. We object to the inclusion of Site 155/1210 in its current form as shown in the SHLAA and consequently object to this reference to that site in paragraph 6.40. (vi) The reference in paragraph 4.61 to the “most suitable location” being “within the AONB” and that this land could be developed “without strategic adverse impact on the landscape”. The Council’s evidence base does not demonstrate that the land within the AONB is more suitable for development than the non-AONB previously developed land on High Street. There is no assessment by the Council of the suitability of this non-AONB land (which includes the objector’s land at Lavender Cottage, High Street, Heathfield, TN21 0UP) and yet it is more suitable than the AONB land, being (i) not subject to a national landscape designation, (ii) previously developed land, (iii) within the existing settlement boundary, and (iv) well related and integrated into the urban area and existing transport connections. In addition, the Council’s evidence base does not show that 160 dwellings can be provided in the AONB without strategic adverse impact on the landscape. The capacity of 160 dwellings for SD11 would appear to derive from the assumed capacity of 2 adjacent SHLAA sites at north west Heathfield (Site 155/1210 with a capacity of 123 dwellings at 40 dph and Site 307/1210 with a capacity of 35 dwellings at 35 dph). The Council’s Landscape Character Assessment (February 2009) shows at Figure 5 that large parts of these
SHLAA sites are required to be retained as open space to provide a “landscape buffer” to Tilsmore Wood. If those buffers are to be provided as recommended in the Landscape Character Assessment, the SHLAA sites will not be able to deliver the required capacity, without radical changes to the assumed density, and there has been no assessment of the impact of higher density development on the AONB and on the landscape setting and character of Tilsmore Wood. The claim therefore that SD11 can be achieved without strategic adverse impact on the AONB is not supported by the evidence base. (vii) The reference in paragraph 6.41 to the release of AONB land being justified “as no suitable alternative non-AONB location exists”. The Council’s evidence base does not substantiate this assertion. The Council has not assessed the suitability of the non-AONB land in this location which fronts High Street (including the objectors’ land at Lavender Cottage). This non-AONB land is within the settlement limits of Heathfield as identified on the Proposals Map of the saved Local Plan and paragraph 6.48 of the Core Strategy confirms that within development boundaries “the principle of development is acceptable”. The principle of redeveloping this land to provide more intensive residential development has already been accepted by the Council, with the grant of planning permissions at Brackenside (WD/08/0329) for 3 dwellings in place of 1 dwelling, and at Oaksdown/Lowlands (WD/2011/0400) for 9 apartments in the place of 2 dwellings. The more intensive development of the non-AONB land on the High Street frontage would minimise (or may even remove) the need for the use of AONB land. This option would plainly be a more suitable alternative than the use only of land “within the AONB” as proposed in the Core Strategy. (viii) The reference in paragraph 6.41 to “no suitable alternative contingency land is available”. The land at Oaksdown/Lowlands is available for development (as confirmed by the recent renewal of planning permission). The objectors’ land at Lavender Cottage is available for development (and this has been made known to the Council since at least August 2010). The land at Woodatch is relied on as being available for development in order to provide the access for SHLAA site 155/1210. The objectors understand that the land at Holmhurst could be made available for development. Thus, there is a continuous frontage of 5 plots of non-AONB land available (all with generous areas of garden land, most of which is excluded from the AONB) just on this part of the High Street. Were the Council to actively promote a comprehensive redevelopment of this area it is likely that other land in the vicinity would be made available. However, the Council has simply failed in its evidence base to assess this option. If it is necessary to identify contingency land then the hinterland of AONB land should be identified as contingency land, with priority being given to the development of the non-AONB land on the High Street frontage. Prioritising that land would be consistent with the policy objectives of minimising the loss of AONB land and maximising the use of previously developed land. (ix) The reference in paragraph 6.42 item 3 to SD11 being “on land adjacent to the urban area”. The proposal for SD11 should not be defined in a way which excludes the urban area and which focuses only on land within the AONB. The proposal should embrace the urban area and the development should maximise the use of previously developed land in the urban area to achieve the provision of 160 dwellings before any consideration is given to the use of land in the AONB. (x) Figure 10 Heathfield Area Strategy. This diagram shows SD11 as located within the AONB and beyond the existing settlement. The diagram should not exclude the inclusion of the existing built up area in this location within the scope of SD11. The built up area has the potential and the capacity to be redeveloped and this aim should be the first priority at north west Heathfield. (xi) Key Diagram: the inset for Heathfield. The inset shows Heathfield and Proposal SD11 in the same way that they are shown on Figure 10 and they are not acceptable for the same reason set out at (x) above. 4. We now propose to elaborate on these objections. Piecemeal not comprehensive 5. SD11 takes an opportunistic approach. It utilises substantial areas of greenfield land as the main development areas (and by implication from the SHLAA one existing property simply as a means of access). Although the SHLAA indicates that Site 155/1210 is in multiple ownerships and Site 307/1210 is owned by a company with 7 shareholders, the choice of this location seems to be influenced simply by the fact that these 2 sites were promoted in the SHLAA and so it is assumed they are available. Site 155/1210 is said to be under the control of a housing developer. We are not aware whether the Council has seen the terms of any option or other legal agreement giving such control but, given that the Proposed Submission Core Strategy is a long term strategy to 2030 and its trajectory does not anticipate the site coming forward before 2015/16, little weight can be given to the status of any current contractual arrangements. 6. Any sensible spatial planning approach to the development of this area would not look at the sites promoted in the SHLAA in isolation but would look to see how that development would relate to its local context and how it would relate to the settlement it is intended to form a part of. 7. The site of SD11 is on sloping ground set back behind existing development which separates the site from the rest of Heathfield. Development as proposed will not integrate the development with its local context as required by paragraph 35 of PPS1. Nor will it maximise the opportunities for the site to benefit from clear and easy links to the facilities in the local service centre by non-car modes. 8. A comprehensive approach would look at the whole of the area in this north western part of Heathfield and then seek to identify the land which is most suited to development. It is common sense that this would start by looking at the land with the best links by foot, cycle, and public transport to the rest of the settlement. That is of course the frontage land along Heathfield Road/High Street itself. The frontage land also contains the previously developed land comprising the existing dwellings and their various outbuildings. Whilst the recent revisions to PPS3 have removed garden land from the definition of previously developed land, the footprint of the buildings and their associated driveways and hardstandings clearly have a higher priority for development than a greenfield meadow. 9. The present objectors, as the owners of Lavender Cottage, are willing to make their land available as part of a wider development. The objectors have made this known to the Council since at least August 2010. The principle of redevelopment for more intensive residential development has already been established on land to the wets (WD/08/0329) and on the adjoining site.
to the east of Lavender Cottage (WD/2011/0400). Although planning permission was granted for a block of flats (WD/2008/0276), that development has not come forward and the permission has recently had to be renewed. Clearly, the land is available for development, even if the form of development is not at present attractive to the market. We understand that the owner of the adjoining plot at Holmhurst would be prepared to make that site available. Woodhatch is relied on as available in the SHLAA (Site 155/1210 refers). Thus there is already a substantial amount of the frontage land which is available for development. A spatial approach to the planning of this area would look to utilise this developed frontage land, which plainly has development potential, before turning to the undeveloped hinterland to the rear. Unjustified Encroachment into the AONB

Paragraph 22 of PPS7 is clear that major development in the AONB requires “the most rigorous examination” and that such development should only be accepted after assessment of the scope for meeting the need elsewhere. Under the GDMO 2010 “major development” is a development of 10 or more dwellings. Under the Secretary of State’s arrangements for the recovery of appeals on the basis that they are large/controversial, the threshold is 150 residential units. On either basis, a development of 160 dwellings is major development. In any event, the Council has accepted in the SHLAA that “there is a requirement to demonstrate development is essential to meet local needs and that other more suitable sites do not exist elsewhere” (Site 155/1210). The claimed rationale for the use of AONB land in this case is that “no suitable alternative non-AONB location exists”. This is patently incorrect. As already noted, the frontage land is not within the AONB and if the desire is to achieve a development of some 160 dwellings there can be no justification for taking more AONB land than is absolutely necessary when there is non-AONB land in the same location which is available. 11. Whilst it may be doubtful that the frontage land which is known to be available could alone accommodate the full scale of the development sought, the need to encroach into the AONB would be very much reduced if the frontage land was used first. Such an approach would also enable the lower (and least accessible) parts of the meadow to be retained as open land, potentially providing a better buffer with the important woodland at Tilsmore Wood that makes up such a key component of the Wealden character. The need for such a buffer is recognised in the Landscape Character Assessment (Figure 5). In addition, if the Council made it clear that it was promoting the comprehensive development of the area, it is likely that other owners would also wish to make their land available, and the Council may therefore be able to avoid encroaching into the AONB to any material degree. 12. The Council’s claim that 160 dwellings can be provided in the AONB without strategic adverse impact on the landscape is not supported by the evidence base. The capacity of 160 dwellings for SD11 would appear to derive from the assumed capacity of the 2 adjacent SHLAA sites: Site 155/1210 and Site 307/1210. As already noted, the Council’s Landscape Character Assessment shows (Figure 5) that large parts of these SHLAA sites are required to be retained as open space to provide a “landscape buffer” to Tilsmore Wood. If those buffers are to be provided as recommended in the Landscape Character Assessment, the SHLAA sites will not be able to deliver the required capacity, without radical changes to the assumed density, and there has been no assessment of the impact of higher density development on the AONB and on the landscape setting and character of Tilsmore Wood. The claim therefore that SD11 can be achieved without strategic adverse impact on the AONB is not supported by the evidence base. Using Less Accessible and Less Sustainable Land

13. Similar considerations in terms of minimising the amount of AONB land apply in relation to accessibility issues. The lower parts of the sloping meadow land are not only more remote by simple distance from the footways and bus route along Heathfield Road/High Street, there is also the fact that journeys from home will inevitably be uphill for residents of that area. There will therefore be a disinclination to use non-car modes for accessing local services, even if they might appear to be within walking distance. It must also be doubted whether much of the hinterland is within the preferred 400m distance for access to a bus route. 14. Again, on any sensible measure of accessibility and sustainability, it cannot make sense to use the more remote hinterland in preference to the frontage land. PPS1 is clear at paragraph 35 that new development needs to be integrated into the urban area and address connectivity issues. The choice of a backland location for SD11 when the more accessible frontage land is available is directly contrary to this guidance. 15. As already explained why a comprehensive approach needs to be taken to this area. However, if the Council persists in its piecemeal approach then it is apparent that inadequate consideration has been given to the relationship between the retained frontage properties and the new development to the rear. The existing development is at a very low density and has the established character of a mature residential area, with individual dwellings in spacious plots. 17. The SHLAA indicates a proposed density for the new development of some 40 dwellings per hectare for Site 155/120. This will be substantially different in character and could only be achieved by ensuring a substantial buffer between the 2 very different forms of development. However, this would push the new development further into the AONB and would further separate the new development from the settlement of which it is intended to form a part. Again, there would be a conflict with the advice in PPS1 on integrating the development with the urban area. Soundness Tests

18. It is clear from the objections set out above that the proposals for SD11 are not founded on a robust and credible evidence base, cannot be shown to be the most appropriate strategy when considered against the reasonable alternatives, and are not consistent with national policy in PPS1, PPS3, and PPS7 in several important respects. They therefore fail 2 of the key tests of soundness as set out at paragraph 4.52 of PPS12. Legal Tests 19. These objections also have the consequence that the Council’s failure to properly consider reasonable alternatives to its proposals at
north west Heathfield, and in particular to consider the alternative of an area of growth in this location planned on a comprehensive basis and focused on maximising the use of previously developed land and minimising the use of land within the AONB, has the consequence that the Sustainability Appraisal/Strategic Environmental Assessment that accompanies the Core Strategy is legally deficient and the Core Strategy is consequently not legally compliant with the requirements of either Regulation 5(1) of the Environmental Assessment of Plans and Programmes Regulations 2004 or with the requirements of s.19(5) and s.20(2) Planning & Compulsory Purchase Act 2004. In addition, the same failings, together with the lack of a credible and robust evidence base to support those proposals and the conflicts with national policy mean that the Core Strategy is not “sound” as required by s.20(5)(b) PCPA 2004.

20. The SA/SEA considers, in broad terms, alternative locations for growth at Heathfield as between the north east, north west, and west of the town. However, what it fails to do is to look at reasonable alternatives within the selected north west location. It is no answer for the Council to suggest that this level of detail is a matter for a later DPD because the Core Strategy is already spatially specific that the location of north west Heathfield is an “urban extension” (i.e. an addition) and that it is “within the AONB” (i.e. outside the settlement boundary. The same spatial approach is shown on Figure 10 and on the Inset for the Key Diagram. The Council is not, therefore, able to avoid grappling with the spatial implications of this choice as part of the Core Strategy and testing it against reasonable alternatives. However, it is clear that this is not an exercise that has been attempted in the SA/SEA. 21. The Council will be well aware from the recent decision in Save Historic Newmarket Ltd v Forest Heath District Council [2011] EWHC 606 (Admin) that a failure in the SA/SEA to give proper consideration to identification and assessment of reasonable alternatives is likely to result in a quashing of the relevant parts of the Core Strategy. Conclusion 22. For all of these reasons the objectors strongly suggest that neither the Council nor the Inspector should endorse the present proposals for SD11. What is required is a fundamental rethink to achieve an integrated, sustainable and accessible development which minimises the impact on the AONB and provides a comprehensive spatial approach to the development of this area. Essentially this requires the focus to shift from the “easy target” of greenfield meadows to a more considered approach, giving priority to the previously developed frontage land, and only considering the AONB hinterland to the minimum extent necessary to achieve the required dwelling numbers.

Details of Changes to be Made:
Change para 6.42 item 3 to read: “meeting the housing and community needs of Heathfield by allocating deliverable housing sites for around 160 homes on land within and potentially adjoining the urban area at north west Heathfield (SD11). Sites for housing development within this broad location will be identified and phased on a comprehensive basis as part of the Site Allocations DPD.”

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**Representative Information**

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<tr>
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<td>High Weald AONB Unit, Woodlands Enterprise Centre</td>
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<tr>
<td>Agent ID</td>
<td>6.42</td>
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<tr>
<td>Paragraph</td>
<td>Sound □ Yes □ No □ Justified □ Effective □ Consistent with national policy</td>
</tr>
<tr>
<td>Legally Compliant</td>
<td>□ Yes □ No</td>
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**Details of Reasons for Soundess/ Legal Compliance:**
The Unit is concerned about the identification of a site at Heathfield - SD11- which proposes a large housing site within the AONB which may compromise the integrity of the AONB boundary. The site is bounded on the north by extensive ancient woodland and is the source of several small streams (see attached plan) that feed into the ancient woodland. Development in this location is likely to have significant impacts on the character of the AONB and is not considered appropriate.

**Details of Changes to be Made:**
Details of Reasons for Soundness/ Legal Compliance:
Natural England share the concerns of the High Weald AONB Unit with regard to a strategic site being situated within the High Weald north west of Heathfield. We recommend that a full assessment of alternatives is undertaken and that any development coming forward in this area is assessed against the criteria of the High Weald Management Plan.

Details of Changes to be Made:
Summary of all Representations - Proposed Submission Core Strategy Regulation 27 - Report 11th July 2011

Representation ID
1483

Person ID 332748
Mr Nightingale
Millwood Designer Homes

Agent ID 102571
Mr Nightingale
Kember Loudon Williams

Paragraph 6.42
Sound ☐ Yes ☑ No ☑ Justified ☑ Effective ☐ Consistent with national policy
Legally Compliant ☑ Yes ☐ No

Details of Reasons for Soundness/ Legal Complaince:
The Proposed Submission Core Strategy places far too much weight on the “topographical and landscape constraints” that are said to affect the town, and far too little weight on the needs of the town in terms of its future housing and other development. While the A265 passes through the town this is not a constraint. Sites that are suitable for development as logical urban extensions are available that have perfectly adequate access. While some AONB land will need to be released, this will not have a detrimental impact on the wider landscape. The needs of the town, and the ability of the town to contribute more fully to the needs of the district as a whole are not properly recognised in the Core Strategy. 2 Additional new housing development would meet the town’s known housing needs, as well as make a significant contribution towards the shortfall of housing in the District that will occur within the plan period. The housing market in Heathfield is stronger than those settlements in the south of the District where the majority of new housing has been focussed. It will increase the demand for public transport services, and allow the existing service to be maintained and improved. 3 The Council has identified land within the AONB on the north-western side of the town for new housing development, but the number of units has been limited to 160. It is considered that this figure should be much higher, not only because the town has the services and facilities needed to serve a larger number of households, it would also help to safeguard the future vitality and viability of the town. The restrictive strategy currently proposed will only encourage dormancy in the settlement and actually harm the quality of life and standard of living of the local community in the longer term. 4 The Council has stated in is Core Strategy Background Paper in Housing Land Availability that it will assume a build-out rate of 60 dwellings per year on sites of less than 199 units (paragraph 2.7). This means that the housing on the allocated land will be completed and disposed of in just over two years. The town will then have a period of around 15 years until the end of the plan period when there will be no housing development except for a trickle of windfall sites. This cannot be a justifiable approach. 5 Figure 10 identifies land adjacent to the town that is proposed for an urban extension. The figure is inaccurate because not all of the land to the north of the A265 is open to views from the wider landscape. In fact much of this land is enclosed by hedgerows and woodland planting. There would not be any undue impact on the wider landscape from a sensitively designed development. 6 In addition, this figure excludes land to the west of the area identified for an urban extension that is not in the AONB. The land at Tilsmore lodge is accessible, and visually and physically well-contained. Any urban extension to the north of the A265 should include this land. 7 The Core Strategy is unsound as it fails to make sufficient housing provision for the town. It is also unsound because it fails to provide sufficient numbers of affordable homes. Paragraph 6.40 states that there is a current need for affordable housing for 112 households. To meet that demand from new development (based on a requirement of 35% affordable provision in Policy WCS8), a minimum of 320 new homes will be required in Heathfield to meet this current demand. Because demand is not static, there will be further need for affordable housing throughout the Core Strategy period. To achieve its delivery targets for affordable homes, the allocated number of homes for Heathfield realistically needs to be in the order of 500 + over the duration of the Core Strategy, but with a significant allocation in the early phases to meet current demand.

Details of Changes to be Made:
A minimum of 500 dwellings should be provided at Heathfield, and Figure 10 should be amended to enlarge the area for residential provision to include the land to the west.
Summary of all Representations - Proposed Submission Core Strategy Regulation 27 - Report 11th July 2011

Details of Reasons for Soundess/ Legal Complaince:

1. The Proposed Submission Core Strategy places far too much weight on the "topographical and landscape constraints" that are said to affect the town, and far too little weight on the needs of the town in terms of its future housing and another development. While the A265 passes through the town this is not a constraint. Sites that are suitable for development as logical urban extensions are available that have perfectly adequate access. While some AONB land will need to be released, this will not have a detrimental impact on the wider landscape. The needs of the town, and the ability of the town to contribute more fully to the needs of the District as a whole are not adequately recognised in the Core Strategy. 2. Additional new housing development would meet the town's known housing needs, as well as making a significant contribution towards the shortfall of housing in the District that will occur within the plan period. The housing market in Heathfield is stronger than those settlements in the south of the District where the majority of new housing has been focussed. Heathfield need higher levels of new housing to provide more buoyancy in the market and choice for residents which will in turn avoid outward migration from the town and the risk of declining services and social infrastructure. A higher housing allocation will increase the demand for public transport services and future provision and allow the existing service to be maintained and improved. 3. The Council has identified land within the AONB on the north-western side of the town for new housing development, but the number of units has been limited to 160. It is considered that this figure should be much higher, not only because the town has the services and facilities needed to serve a larger number of households, but it would also help to safeguard the future vitality and viability of the town. The restrictive strategy currently proposed will only encourage dormancy in the settlement and actually harm the quality of life and standard of living of the local community in the longer term. 4. The Council has stated in its Core Strategy Background Paper in Housing Land Availability that it will assume a build-out rate of 60 dwellings per year on sites of less than 199 units (paragraph 2.7). This means that the housing on the allocated land will be completed and disposed of in just over two years. The town will then have a period of around 15 years until the end of the plan period when there will be no housing development except for a possible trickle of windfall sites. This cannot be a supportable approach. 5. Figure 10 identifies land adjacent to the town that is proposed for an urban extension. The figure is inaccurate because not all of the land to the north of the A265 is open to views from the wider landscape. In fact much of this land is enclosed by hedgerows and woodland planting. 6. The Core Strategy is unsound as it fails to make sufficient provision for the town. It is also unsound because it fails to provide sufficient numbers of affordable homes. Paragraph 6.40 states that there is a current need for affordable housing for 112 households. To meet that demand from new development (based on a requirement of 35% affordable provision in Policy WCS8) a minimum of 320 new homes will be required in Heathfield to meet this current demand. Because demand is not static there will be further need for affordable housing throughout the Core Strategy period. To achieve its delivery targets for affordable homes, the allocated number of homes for Heathfield realistically needs to be in the order of 500+ over the duration of the Core Strategy, but with a significant allocation in the early phases to meet current demand. Due to the size of additional appendices they have not been uploaded but are available to view at the Council's offices.

Details of Changes to be Made:

7. Land to the east of the town has been put forward for inclusion in earlier incarnations of the Core Strategy, principally SHLAA sites 258/1210; and 259/1210 on the norther side of the A265 and additionally SHLAA sites 260/1210; 275/1210 and 299/11210 on the southern side of the A265. The land is available and can deliver highway improvements, new homes, open space and community provision at an early stage in a comprehensive approach. The Core Strategy is simply wrong at paragraph 6.41 where it states that there are no suitable alternative sites available. The above are sites that are demonstrably available and suitable as the submitted supporting reports clearly indicate. This land is favoured by the Parish Council for development and if allocated for in the order of 250 new homes, existing highway constraint would be addressed and contributions secured to provide social and community provision (such as the needed swimming pool identified at paragraph 6.39). This can be achieved at this scale and level of development but would not achieve these objectives at the level proposed in the Core Strategy. New housing at the proposed level will maintain the town's future vitality and economic wellbeing and will help to maintain local services and avoid the prospects of Heathfield being starved of investment and resources in the future, with the very real risk that present services will decline, and for the town to
simply become no more than a commuter town for the larger centres of Tunbridge Wells, Eastbourne and beyond

**Representation ID**
462

**Person ID**  Mr Phillips
104870

**Agent ID**
Campaign for Better Transport

**Paragraph** 6.42

**Sound**  
☑ No  ☐ Justified  ☑ Effective  ☐ Consistent with national policy

**Legally Compliant**  
☑ Yes  ☐ No

**Details of Reasons for Soundess/ Legal Complaince:**
Policies to restrain traffic, obtain modal shift in travel, reducing need to travel and improve the experience of non-car travel need to be sharpened and focused. Aspirations for these to happen must have necessary circumstances incorporated into the policies.

**Details of Changes to be Made:**
Demand management techniques for traffic in Hailsham (6.15) should be included in all the related and equivalent policies. There should be a definite commitment to traffic reduction measures and targets throughout the Strategy Plan document.

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**Representation ID**
1620

**Person ID**
Pelham Homes
107745

**Agent ID**
Mrs Owen
102625

**Paragraph** 6.42

**Sound**  
☐ Yes  ☑ No  ☐ Justified  ☐ Effective  ☐ Consistent with national policy

**Legally Compliant**  
☐ Yes  ☐ No

**Details of Reasons for Soundess/ Legal Complaince:**
"Supplementary documents have been submitted but not attached, and may be viewed at the Council offices on request".

**Details of Changes to be Made:**
REVISION SOUGHT. Increase housing requirement to 200.

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**Representation ID**
112

**Person ID**  Mr Richardson
107121

**Agent ID**
Richardson Architecture

**Growth potential of rural settlements and where development boundaries will be retained**

**Sound**  
☑ Yes  ☐ No  ☐ Justified  ☐ Effective  ☐ Consistent with national policy

**Legally Compliant**  
☑ Yes  ☐ No

**Details of Reasons for Soundess/ Legal Complaince:**
We support the Legal Compliance and Soundness of the Core Strategy. We support its development objectives.

**Details of Changes to be Made:**
Details of Reasons for Soundness/ Legal Compliance:
Only ten houses are allocated to the village of Upper Dicker. This is unsound and unjustified. St Bede’s Senior School, one of the largest employers in the Wealden District is located in Upper Dicker and has already bought a number of homes there for its own use; it also has a brownfield site three on which it may choose to build houses after the development boundary is removed, taking up all or a large part of Upper Dicker’s housing allocation for the foreseeable future. No allocation at all has been made for the village of Arlington.

Details of Changes to be Made:
In table 11 (eleven), allocating housing numbers to the rural villages, the allocation for Upper Dicker should become the allocation for Upper dicker and Arlington and should be increased from ten to thirty.

Details of Reasons for Soundness/ Legal Compliance:
Rural sites may be more constrained, due to topography, landscape, access etc, than those within the built up area. The wording of WCS6 seems to recognise this by implying there should be flexibility in the quantum of new house building within rural areas, as it refers to ‘at least’ 455 dwellings overall. The policy seems therefore to suggest that residential development in the 13 named settlements is a minimum. If so, Fig 11 should reflect this.

Details of Changes to be Made:
Remove settlement banding in notation to Fig 11 of the Core Strategy.
Growth potential of rural settlements and where development boundaries will be retained

Sound  □ Yes  ☑ No  □ Justified  ☑ Effective  □ Consistent with national policy
Legally Compliant  ☑ Yes  □ No

Details of Reasons for Soundess/ Legal Complaince:
Rural sites may be more constrained, due to topography, landscape, access etc, than those within the built up area. The wording of WCS6 seems to recognise this by implying there should be flexibility in the quantum of new house building within rural areas, as it refers to ‘at least’ 455 dwellings overall. The policy seems therefore to suggest that residential development in the 13 named settlements is a minimum. If so, Fig 11 should reflect this.

Details of Changes to be Made:
Remove settlement banding in notation to Fig 11 of the Core Strategy.

Growth potential of rural settlements and where development boundaries will be retained

Sound  □ Yes  ☑ No  □ Justified  ☑ Effective  □ Consistent with national policy
Legally Compliant  ☑ Yes  □ No

Details of Reasons for Soundess/ Legal Complaince:
Rural sites may be more constrained, due to topography, landscape, access etc, than those within the built up area. The wording of WCS6 seems to recognise this by implying there should be flexibility in the quantum of new house building within rural areas, as it refers to ‘at least’ 455 dwellings overall. The policy seems therefore to suggest that residential development in the 13 named settlements is a minimum. If so, Fig 11 should reflect this.

Details of Changes to be Made:
Remove settlement banding in notation to Fig 11 of the Core Strategy.
Growth potential of rural Figure 11 settlements and where development boundaries will be retained

Sound ☑ Yes ☐ No ☑ Justified ☑ Effective ☑ Consistent with national policy
Legally Compliant ☐ Yes ☑ No

Details of Reasons for Soundless/ Legal Complaince:

These representations are made on behalf of Rookwood Trinity Limited, owners of the Non-Statutory Plan Policy V5 site: West of Oakleigh, Five Ash Down. Our comments relate only to the Rural Areas Strategy and in particular the failure to allocate any new development to Five Ash Down under Policy WCS6 and the proposal under that policy to remove the Development Boundary from the village. Inconsistencies in the Rural Areas Strategy make it unsound. If adopted in its present form it could lead to development in relatively unsustainable locations while preventing any new development in relatively sustainable and accessible settlements such as Five Ash Down. Five Ash Down is an example of a settlement with a range of services, close proximity and excellent accessibility to a district centre, Uckfield. In early LDF publications, Five Ash Down was considered suitable for further growth as, indeed, it was in the Non-Statutory Plan where our client’s site was allocated for housing development under Policy V5. In this draft Core Strategy document, Five Ash Down is not proposed for development and it is proposed to remove the present development boundary. This represents a complete reversal of policy from the allocation of a site at Five Ash Down in the non-statutory plan and recognising it as a village with growth potential in early LDF consultation documents. The reasons for such a fundamental change of policy are unclear and ill-founded. This shift appears to be based first on inconsistencies and factual errors in the methodology on which the present draft policy is based and secondly on unsound overemphasis on “parish aspirations”. Methodology 1. Accessibility The “Development of the Proposed Submission Core Strategy Background Paper” Appendix 3 deals with the categorisation of Wealden settlements in terms of public/sustainable transport (including the quality and frequency of those services). The first category “Very Good Accessibility”, the highest category, is defined as “frequency of 30 minutes or less and duration of travel of 30 minutes or less by public/sustainable transport”. Brighton & Hove Transport service 29/29A, which runs between Brighton and Tunbridge Wells, passes through Five Ash Down with a half hour service throughout the day. This provides access to primary and secondary schools, Uckfield Rail Station, Uckfield town centre and to the subregional shopping centres of Brighton and Tunbridge Wells as well as Crowborough and Lewes. The travel times for the facilities referred to in the methodology are significantly less than 30 minutes. On this basis, Five Ash Down should be classified as having very good accessibility. While the Settlement Facilities Matrix in Appendix 4 of the background paper correctly shows Five Ash Down having very good accessibility, in Appendix 3 it is shown as having only “fair accessibility”. The draft policy on Five Ash Down appears to be based on this incorrect assessment. The benefit of a good regular bus service is not always given sufficient emphasis in assessing the sustainability of settlements in comparison with rail services. Many rural bus services are slow, circuitous and infrequent. By contrast Service 29/29A, which serves Five Ash Down half hourly, is regular, frequent and connects the village to the services and facilities of Uckfield and other centres. It provides a greater contribution to accessibility to non-car modes of travel than the rail services in Wealden which mainly provide long distance connections. 2. Services The Settlement Facilities Matrix correctly shows Five Ash Down having a convenience store, post office, public house, place of worship, community hall, business areas and “other locally significant employment opportunities”. However, it shows the village as not having a primary school. In fact, Buxted CE Primary School, lies within walking distance approximately 1 km from the A26 – A272 traffic lights at Five Ash Down. The primary school is in fact slightly closer to Five Ash Down than to most of the village of Buxted lying approximately equidistant between the two. Buxted CE Primary School is, therefore, equally or more accessible to Five Ash Down than it is to the village of Buxted itself. In addition, the No. 29 bus service provides access to primary schools in Uckfield. The Settlement Facilities Matrix also shows it as having no children’s play area whereas the new Ashdown Place development has a children’s play area which is not confined to the residents of that estate alone. Proposals for development of the West of Oakleigh site included provision of additional playspace. If the Policy V5 allocation is confirmed in the forthcoming Site Specific DPD, additional playspace could be provided close to the centre of the village. 3. Assessment of Growth Potential Chapter 8 of the Development of the Proposed Submission Core Strategy Background Paper includes “Table 2 – Rural Growth Potential”, which contains an appraisal of growth potential for those rural settlements that are either accessible or have some facilities. Five Ash Down is classified as a Neighbourhood Centre. The analysis is complicated by the fact that some of the assessments are on a village/settlement basis and others on a parish basis. Five Ash Down lies within Buxted Parish and is, therefore, denied a voice of its own in this context. One of the criteria – “Parish Council Favoured Option” – states: “No further development due to current allocations.” However, the footnote indicates...
that this comment was taken from responses to the Spatial Development Options consultation in July 2009 and in any event the reference to “current allocations” can only mean the allocations in the Wealden Local Plan and the Non-Statutory Plan, including the Policy V5 allocation at Five Ash Down. The analysis recognises that Five Ash Down is “well related to Uckfield with good connectivity and future employment opportunities” and that “development in this area is sustainable by virtue of links with Uckfield by public transport and employment provision in the area could meet wider housing needs”. The conclusion of “no growth potential” for Five Ash Down is at odds with that analysis and is based on the statement that development is “not compatible with Parish aspirations and significant growth could lead to a change in the hierarchy or settlements”. This conclusion contradicts the preceding analysis. The Parish’s apparent assumption that the Non-Statutory Local Plan allocated sites will be developed is not consistent with a conclusion that will result in the Policy V5 allocation site at Five Ash Down not being developed.

Details of Changes to be Made:
In summary, the Rural Areas Strategy needs further refinement and the correction of factual errors and inconsistencies. Five Ash Down has “Very Good Accessibility” and a good range of local services and facilities. On this basis it should be considered suitable for further modest growth and its development boundary should be retained. Five Ashdown does not neatly fit the criteria of Neighbourhood Centre defined in the document and background paper. The development of sustainable sites such as the Policy V5 site at Five Ash Down should not be precluded by Core Strategy Policy. The Council has previously judged the site suitable for allocation for low density development. At that time, the density policy for the site was inconsistent with national density guidelines in PPS3. Those density guidelines have now been removed and there is nothing to prevent the Council from revisiting the policy at its own density preference. That would be supported by the landowner.

Representation ID
113
Person ID Mr Richardson
Agent ID Richardson Architecture
Paragraph 6.43
Sound ☑ Yes ☐ No ☐ Justified ☐ Effective ☐ Consistent with national policy
Legally Compliant ☑ Yes ☐ No

Details of Reasons for Soundess/ Legal Compliance:
We support the Legal Compliance and Soundness of the Core Strategy. We support its development objectives.

Details of Changes to be Made:
Details of Reasons for Soundess/ Legal Complaince:
Object to low level of dwelling provision in the rural areas. Object to the classification of Maresfield as neighbourhood centre and the removal of its development boundary. Object ot the low level of house provision in Maresfield as the adjacent Ashdown business Park justifies an allocation of 300 to 400 so workers can live where they work and reduce car travel. Most of the villages in the area are dying due to the lack of additional housing as the population cannot now sustain local needs. They are becoming more and more dormitory dead villages where the older rich and retired can live, but all the young people have to leave to go and live in the towns. It is also noted by the countil in para 2.14 that most of the small businesses in the area are farm based in converted farm buildings. This must therefore imply that many of the workers are actually travelling by car from the towns to the rural areas for their jobs. Therefore allowing more houses in the villages would actually cut travel to work by car journeys since more people could live where they work and help revitalise dying villages. Regarding Maresfield, it is much larger than the other villages in the neighbourhood centre group and contrary to the council's assessment has similar or greater facilities than most of those in the Local Service Centre group. In particular it is immediately adjacent to the Ashdown Business Park which is planned to provide 1000 jobs. It also has as many if not more shops, garages, pubs than most of the LSC group, and certainly has much more than those in the NC group. In particular, if Buxted is considered a LSC, where there is minimal local employment, no more shops than Maresfield, no garage, and the local village shop appears to have closed, and is considered an LSC then clearly Maresfield should also be in this group. Maresfield should retain a development boundary. given that the council state that one of the aims of the strategy is to limit car travel and enalbe people to live where they work, clearly the uniqueness of Maresfield having the large employment site next to it means much more new housing should be allowed there as well. As otherwise as things stand at the momembe, with a mainly older retired current population of Maresifle with few of working age, means the vast majority of workers at the Ashdown Business Park will have to drive in from other parts of the area.

Details of Changes to be Made:
On the current housing provision figures increase the rural areas allocation to 2000, and take these from the town sites already objected to as being unsustainable or undeliverable. If the housing provision number in SCS1 is increased as submitted by the objectors increase the rural areas amount accordingly. Change Maresfield to where it would be, a Local Service Centre and retain a development boundary. Allocate 300 - 400 houses to Maresfield to allow workers at the Ashdown Business Park to live where they work, and not have to travel in by car from other parts of the area. The council have had plenty of submissions to past plans to know that joined up planning on their behalf can produce an excellent site in south maresfield with large amounts of stream side POS, foot and cycle bridge with direct access to the ABP, and other village enhancements to provide somewhere where workers at the ABP would want to live and avoid lengthy and costly daily car journeys to work.
The references to ‘dispersed settlement pattern’ in Wealden, with 93 per cent of the district containing half of its population are misleading, so affecting the policies derived from that thinking. It ignores the significance of nucleated villages as well as the main towns.

Details of Reasons for Soundness/ Legal Compliance:
The settlement pattern seen as ‘dispersed’ for half of the population needs refining in the document. The proportions of those living in places larger than 500 and 1,000 should be identified. There is great scope for serving these by public transport evolving from the present network, with limited strict dependence on cars.
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Details of Reasons for Soundess/ Legal Complaince:
We support the commitment to ensure that the capacity for growth of any of the hierarchy settlements must be assessed on the characteristics of the individual settlement and its landscape context. Development should be of a kind and scale appropriate to protect and enhance services and support sustainable rural life. Within the wider countryside we support the policy that development should be that which meets an essential rural need, supports rural diversification and promotes sustainable tourism

Details of Changes to be Made:
Details of Reasons for Soundness/ Legal Compliance:

We support the Legal Compliance and Soundness of the Core Strategy. We support its development objectives.

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Paragraph 6.45

Details of Reasons for Soundness/ Legal Compliance:

We support the commitment to ensure that the capacity for growth of any of the hierarchy settlements must be assessed on the characteristics of the individual settlement and its landscape context. Development should be of a kind and scale appropriate to protect and enhance services and support sustainable rural life. Within the wider countryside we support the policy that development should be that which meets an essential rural need, supports rural diversification and promotes sustainable tourism.

Details of Changes to be Made:

Policy WCS6 and the proposals map should provide clarity on the proposed revisions to the development boundaries. We consider that the land to the rear of Mountney Bridge Industrial Estate should be included within the Development Boundary, this reflects its previous allocation in the adopted 1998 Local Plan. Please see the Indigo Planning letter dated 15 April 2011, which sets out why this land should be included.

Details of Changes to be Made:

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Distinction between towns and villages, where development may be appropriate and smaller settlements where protection of the countryside would normally take precedence. The current (non-statutory) Wealden Local Plan lists 39 villages with development boundaries. (para.19.50). some are quite small settlements (e.g. Fairwarp) where further development is clearly inappropriate, and where removal of the development boundary is probably correct. The proposed new Core Strategy (WC S6) retains development boundaries for 14 villages and removes them from 13. However in some cases the rationale behind retaining or removing development boundaries is unclear, as in the case of Buxted where the boundary is retained and Maresfield where it is removed. We wish to see the Development Boundary retained for Maresfield for the following reasons: · The village has grown considerably over the past 20 years by extension and infill, and by virtue of its strategic position, remains under considerable development pressure. We are not advocating major new development but wish to see further development properly controlled for the benefit of the village as a whole. · The Ashdown Business Park (see para. 3.21) to the immediate west of the village has now received planning consent, and as it develops should provide considerable employment for the village. · The village is strategically placed at the intersection of the major east-west and north-south routes, and as a direct result of this has relatively very good bus services in most directions (as compared with Buxted for example) which would be further enhanced. We note that one of the aims of the Core Strategy (see SPD.7) is to reduce private car usage, and consider the development of frequent and reliable bus services, is almost certainly the way to achieve this. Regrettably rail services in this part of Wealden can very limited impact on the local need to travel. · Although the village has limited facilities at present, it has all the elements of a vibrant community, primary school, church, village shop and post office. · There is general support for a small number of new homes in this village (Maresfield) over and above the 80 provided for in the current non-statutory Local Plan. Almost certainly this will require some extension of a retained Development Boundary.

Details of Changes to be Made:

Mr. Richardson
Richardson Architecture
Paragraph 6.47
Sound Yes No Justified Effective Consistent with national policy
Legally Compliant Yes No

We support the Legal Compliance and Soundness of the Core Strategy. We support its development objectives.

Details of Changes to be Made:
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cycle bridge with direct access to the ABP, and other village enhancements to provide somewhere where workers
at the ABP would want to live and avoid lengthy and costly daily car journeys to work.
Details of Reasons for Soundness/ Legal Complaince:
Policy WCS6 – Rural Area Strategy The main thrust of this Policy, as promoted, is to catalogue Wealden settlements by, apparently, population levels. The result will exclude those falling into ‘Neighbourhood Centres and Unclassified settlements’ and representing the major portion (some 57%) of Wealden District land area, from any meaningful residential housing policy. In categorising the various settlements in this way, the district Council ignores the contribution which contained residential development makes to sustaining vibrant rural village communities. In consequence, no less that 27 currently sustainable villages, as recognised in the out going Local Plan, are to be emasculated, preventing all further growth during the period to 2030. The well intentioned and avowed aim of protecting the countryside is acknowledged. However, the abdication of its responsibilities is not an option open to the District Council. The direct effect of Policy WSC6 will cause those villages which are to be given this doubtful protection to stagnate and decay into geriatric dormitories. If this Policy is adopted there can be no interaction for the moribund local communities it creates, through the intake of younger people. The District Council will cite proposed Policy WCS 9, )Rural exception affordable housing), as a source of local housing, in defending the path they have chosen to pursue. Experience has shown that ‘exception’ housing policies, as entombed in successive Adopted local plans and applied first through housing associations (HAs), then through registered social landlords (RSLs) and more recently, through approved landlords (ALs), have been an almost total failure. The problem is well recognised but never acknowledged by those with the discretion to do something about it. It is this. Any land suitable for ‘exception’ housing is equally suitable for private housing development. Consequently and with no more land being made available, landowners prefer to retain their holdings, rather than support exception housing, which gives a return of about 1% of what their land would be worth for equivalent private housing development. Land can only be built on once!

Details of Changes to be Made:
We consider the Deleted development boundaries should be restored to the 27 villages the District Council seeks to emulate in proposed Policy WCS6. We refer to Q4 above, and to the preamble in paragraph 5 of the 19th October document. The district Council sets out to achieve housing growth of 400 units per annum. It quotes that number of dwellings per annum for a plan period of 18 years, (2012 to 2030), producing some 7200 homes in total. In analysing the figures proffered in Policy WCS 2, (Distribution of Housing Growth 2006 – 2030), these amount to 8000 dwellings in total and include the commitments already in hand for the period 2006 to 2012. However, these earlier commitments are not confirmed by completions. Taking current national housing performance, completions will be well below commitments. The draft Core Strategy seeks to create an imbalance in favour of family housing in the south of the district. This proposed imbalance take nebulous account of realistic employment prospects for those families who are being ‘designed’ into the southern housing. This imbalance restricts numbers in the north, where there is some prospect of local employment, and in the villages where, were it allowed, there are realistic prospects that developments would actually take place. Directing family housing to the south will hardly assist the adjoining Eastbourne District, which is already an area of low employment. In practice, the District Council’s financial liabilities will be further extended. The draft Core Strategy, in further seeking to restrict residential development to ‘towns only’, creates fundamentally unsound policy. The result is likely to be a sluggish take up and completions which will fall short of the targets set. The high cost of implementing recent changes to building regulations, together with general infrastructure requirements, will further constrain housing development. A lack of local employment in the south will promote out commuting and by car on an antiquated road network, given the lack of alternative public transport. We propose that the probable shortfall in housing completions be computed and the result be evenly distributed between the villages being unfairly shorn of their development boundaries. This will off-set the debilitating effect draft Policy WCS6 will otherwise cause to the district, should it be adopted.
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<th>Representation ID</th>
<th>Person ID</th>
<th>Agent ID</th>
<th>Paragraph</th>
<th>Sound</th>
<th>Legally Compliant</th>
<th>Details of Reasons for Soundness/ Legal Complaince:</th>
<th>Details of Changes to be Made:</th>
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<td>119</td>
<td>Mr Richardson</td>
<td>107121</td>
<td>6.49</td>
<td>✔ Yes</td>
<td>✔ Yes</td>
<td>We support the Legal Compliance and Soundness of the Core Strategy. We support its development objectives.</td>
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<tr>
<td>489</td>
<td>Mrs Larkin</td>
<td>330727</td>
<td>6.49</td>
<td>☐ No</td>
<td>✔ Yes</td>
<td>Only ten houses are allocated to the village of Upper Dicker. This is unsound and unjustified. St Bede’s Senior School, one of the largest employers in the Wealden District is located in Upper dicker and has already bought a number of homes there for its own use; it also has a brownfield site three on which it may choose to build houses after the development boundary is removed, taking up all or a large part of Upper Dicker’s housing allocation for the foreseeable future. No allocation at all has been made for the village of Arlington.</td>
<td>In table 11 (eleven), allocating housing numbers to the rural villages, the allocation for Upper Dicker should become the allocation for Upper dicker and Arlington and should be increased from ten to thirty.</td>
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Object to low level of dwelling provision in the rural areas. Object to the classification of Maresfield as neighbourhood centre and the removal of its development boundary. Object to the low level of house provision in Maresfield as the adjacent Ashdown business Park justifies an allocation of 300 to 400 so workers can live where they work and reduce car travel. Most of the villages in the area are dying due to the lack of additional housing as the population cannot now sustain local needs. They are becoming more and more dormitory dead villages where the older rich and retired can live, but all the young people have to leave to go and live in the towns. It is also noted by the council in para 2.14 that most of the small businesses in the area are farm based in converted farm buildings. This must therefore imply that many of the workers are actually travelling by car from the towns to the rural areas for their jobs. Therefore allowing more houses in the villages would actually cut travel to work by car journeys since more people could live where they work and help revitalise dying villages. Regarding Maresfield, it is much larger than the other villages in the neighbourhood centre group and contrary to the council's assessment has similar or greater facilities than most of those in the Local Service Centre group. In particular it is immediately adjacent to the Ashdown Business Park which is planned to provide 1000 jobs. It also has as many if not more shops, garages, pubs than most of the LSC group, and certainly has much more than those in the NC group. In particular, if Buxted is considered a LSC, where there is minimal local employment, no more shops than Maresfield, no garage, and the local village shop appears to have closed, and is considered an LSC then clearly Maresfield should also be in this group. Maresfield should retain a development boundary. Given that the council state that one of the aims of the strategy is to limit car travel and enable people to live where they work, clearly the uniqueness of Maresfield having the large employment site next to it means much more new housing should be allowed there as well. As otherwise as things stand at the moment, with a mainly older retired current population of Maresfield with few of working age, means the vast majority of workers at the Ashdown Business Park will have to drive in from other parts of the area.

Details of Changes to be Made:
On the current housing provision figures increase the rural areas allocation to 2000, and take these from the town sites already objected to as being unsustainable or undeliverable. If the housing provision number in SCS1 is increased as submitted by the objectors increase the rural areas amount accordingly. Change Maresfield to where it would be, a Local Service Centre and retain a development boundary. Allocate 300 - 400 houses to Maresfield to allow workers at the Ashdown Business Park to live where they work, and not have to travel in by car from other parts of the area. The council have had plenty of submissions to past plans to know that joined up planning on their behalf can produce an excellent site in south Maresfield with large amounts of stream side POS, foot and cycle bridge with direct access to the ABP, and other village enhancements to provide somewhere where workers at the ABP would want to live and avoid lengthy and costly daily car journeys to work.
As highlighted in the Core Strategt, Wealden is a predominantly rural district with approximately 50% of its population living outside main urban settlement (Para 6.43). In the context of the above we support Strategic Policy WCS6 - Rural Area Strategy which seeks to distribute at least 455 dwellings, proposed under Strategic Policy WCS2, throughout 13 settlement/ villages which consist of a combination of Service Centres, Local Service Centres, Neighbourhood Centres and Unclassified Settlements. Of the 455 dwellings. Horam is allocated 100 dwellings, the largest amount of any of the settlements/ villages within the rural area and equating to 22% of the rural allocation in total. Thus we support this level of housing proposed in Horam. The suitability and acceptability of development in Horam is discussed within the supporting Sustainability Appraisal and the accompanying Background Paper 3, in which the Authority has undertaken individual sustainability appraisals of the settlements within the settlement hierarchy in order to assist in identifying those which are capable of accommodating future growth. At Paragraph 7.3 of the Sustainability Appraisal it is noted that not only do the assessments utilise the "Information that underpins the settlement hierarchy including accessibility to services and facilities and the relative public transport accessibility links with other settlements offering a range of services, facilities and employment" but also includes "environmental factors including proximity to ecological conservation areas, the potential for the use of greenfield land and potential for flood risk and water quality issues" as well as economic data based upon "the presence of significant employment opportunities, business areas and tourism opportunities as well as economic indicators at the Parish level including average household income and educational attainment". Using this holistic approach and as illustrated within Table 7.2 of the Sustainability Appraisal, Horam is highly ranked in the sustainability hierarchy in terms of Social, Environmental and Economic categories. Although there are settlements which sit higher in the settlement hierarchy, the merits and constrains within the Sustainability Appraisal has rightly recognised that Horam is capable of accommodating development. This is further noted at paragraph 7.19 of the Sustainability Appraisal which states that "Rotherfield, Horam and East Hoathly perform well in sustainability terms and feature higher in the SA hierarchy, due to strong social and economic assessments". Moreover, the individual settlement assessments contained within the Sustainability Appraisal Background Paper 3 highlights that there is "housing land potential identified within Horam, including brownfield land opportunities". Also that "It has important service and employment functions with a wide range of shopping, commercial and recreational potential, services, facilities and employment/ economic opportunities". The assessment concludes that there are "relatively few environmental constraints and there are opportunities to contribute to green infrastructure and wildlife corridors". As is evident from above, Horam is a sustainable settlement which is capable of accommodating the largest proportion of rural allocation. Whilst it is not a function of the Core Strategy to allocate specific sites for development, as will be undertaken through a Site Allocation DPD, we draw attention to the opportunity within Horam to accommodate development on previously developed land at the Former Merrydown Cider site. The site has been considered within the Strategic Housing Land Availability Assessment (SHLAA) - March 2010 (and Addendum October 2010). The assessment outlines the opportunities and constraints for the site noting that the "brownfield site is centrally located and, although prominent in views from the village itself, its development should have only a limited impact on the wider landscape setting of the village". The SHLAA outlines the sites attributes which provide a development site that is suitable, available, and achievable in accordance with para 54 of PPS3: Housing and its capable of accommodating a total net dwelling capacity of 114. Whilst this total net dwelling figure is higher than the total Horam allocation under Strategic Policy WCS6 - Rural Area Strategy, it is envisaged that following further work the final total of dwellings on the Former Merrydown site may be lower, however it is still capable of providing a significant contribution toward the allocated 100 dwellings (at least 70%). Significantly the development of the site will also assist the Authority in meeting both the objectives in national planning policy and SPO14 in that it can deliver a large percentage of Horam's housing requirement on Brownfield land. Furthermore, having reviewed the other sites assessed within Horam, it is evident that the Former Merrydown Cider site is the only realistic previously developed land opportunity within the settlement boundary. Overall we support the distribution of at least 455 dwellings through the rural area and in particular the 100 dwellings allocated within Horam as per Strategic Policy WCS6 - Rural Area Strategy. We further support the suitability and acceptability for the growth of Horam as outlined in both the Sustainability Assessment work and the SHLAA.

Details of Changes to be Made:
Representation ID
27
Person ID  Mrs  Simpson-Wells
333724
Agent ID  Hadlow Down Parish Council
WCS6 Rural Areas Strategy
Policy 6
Sound  ☐ Yes  ☐ No  ☐ Justified  ☐ Effective  ☐ Consistent with national policy
Legally Compliant  ☐ Yes  ☐ No
Details of Reasons for Soundess/ Legal Complaince:
Hadlow Down Parish Council would like to express their continued concern that the development boundary has been removed from Hadlow Down, especially as this was done without consultation with the Parish Council. I would also like to highlight that with regard to document BP1 - Development of the Proposed Submission Core Strategy, appendix 4 - Settlement Facilities Matrix, that Hadlow Down now has a new children's play area and that they do have a sports pavilion which has toilet facilities, however it does not have changing facilities. Can you please ensure that this is recorded on any future documentation.

Details of Changes to be Made:

Representation ID
57
Person ID  The Trustees of the Will of the Fifth Marquess of Abergavenny
515138
Agent ID  Mr  Noel
515135
Strutt & Parker
WCS6 Rural Areas Strategy
Policy 6
Sound  ☑ Yes  ☐ No  ☐ Justified  ☐ Effective  ☐ Consistent with national policy
Legally Compliant  ☑ Yes  ☐ No
Details of Reasons for Soundess/ Legal Complaince:
Policy WS6 allocates housing to the most sustainable settlements in the rural areas of Wealden. This is in accordance with national planning guidance. The rural settlements that have been identified for additional housing have been identified based on a settlement hierarchy which categorises settlements according to their ability to support additional development. This approach is supported by background evidence and is therefore justified. Furthermore, the policy is also effective because it is deliverable (through the Delivery and Site Allocations DPD) and provides sufficient flexibility should the 'proposed' amount of housing allocated to each village not be feasible.

Details of Changes to be Made:
N/A
Representation ID
71
Person ID  Mr  Lee
334101  Selmeston Parish Meeting
Agent ID
WCS6 Rural Areas
Strategy
Policy 6
Sound  ☐ Yes  ☑ No  ☐ Justified  ☑ Effective  ☐ Consistent with national policy
Legally Compliant  ☑ Yes  ☐ No
Details of Reasons for Soundess/ Legal Complaince:
Selmeston Parish Meeting considers that the environmental criterion for classification of settlements have been incorrectly applied to Selmeston, causing it to be classified as a neighbourhood centre, when it would more correctly be described as an unclassified rural settlement. Our settlement was correctly rated low on the social and economic criteria. The much higher environmental rating was assigned on the basis that the limited shopping facilities recently opened in the village would enable a reduction in transport. However, the basic facilities provided by this outlet do not provide for instance any form of protein or vegetables. It is not a village store. It is still necessary to travel in order to obtain the basics of a healthy diet.

Details of Changes to be Made:
If Selmeston were reclassified as an unclassified rural settlement, the allocation of some houses could still be appropriate. The allocation of as many as ten houses would constitute a disproportionately high 20% increase in housing stock. A lesser number of up to five would be appropriate.

Representation ID
91
Person ID  Ms  Van-Gils
336229
Agent ID  Mr  Court
519713  Peter Court Associates
WCS6 Rural Areas
Strategy
Policy 6
Sound  ☐ Yes  ☑ No  ☑ Justified  ☑ Effective  ☑ Consistent with national policy
Legally Compliant  ☐ Yes  ☐ No
Details of Reasons for Soundess/ Legal Complaince:
Objection has been submitted to policy WCS2 on the inadequacy of its proposal to permit just an additional 455 dwellings in the Rural Villages. As policy WCS6 re-iterated that, (although it does, in fact, state "at least" 455 dwellings rather than just 455) then objection also has to be made to this policy. It is considered that a much higher figure than 455 dwellings should be given in this policy, since the Council should be providing 17,300 units rather than the 9,600 proposed in policies SPO3, WCS1 and WCS2. As previously stated, policy WCSs which sets out the proposed distribution of the 9,600 dwellings needs to be re-written so as to encompass the 17,300 units. The resultant figure for the Rural Villages will therefore need to be reflected in policy WCS6. It has already been stated in respect of policy WCS4 that a further strategic development area, namely land west of Mayfield, should be included in that policy. That will therefore also need to be referred to in policy WCSs. No amendments or increases are otherwise proposed in respect of the settlements listed in WCS6. However, in the light of the objections to the inadequacy of the overall additional housing figures of 9,600 units, then the Council should willingly accept other proposals for increased units in these - and other - settlements.

Details of Changes to be Made:
Details of Reasons for Soundness/ Legal Compliance:

We believe that to remove all small settlements (neighbourhood centres and smaller) from the development boundaries, and to make them subject to countryside policies only, is too general an assumption to make at Core Strategy level. The decision as to whether a settlement should have a development boundary or not should be when the Proposals Map DPD is considered - such consideration should not be prejudiced by generalisations contained within the Core Strategy. The Core Strategy should only be for large strategic allocations, not the smaller allocations that may be found in smaller centres.

Details of Changes to be Made:

The Core Strategy should restrict itself to classifications of settlements, it should not be used to then define each settlement’s development boundary (or lack of). The Core Strategy should only be for large strategic allocations, not the smaller allocations that may be found in smaller centres.
A key test of ‘soundness’ for Wealden’s Core Strategy is conformity with national planning policy. Planning Policy Statement 7: ‘Sustainable Development in Rural Areas’ (PPS7) is particularly relevant in regard to Policy WCS6. It is considered that development proposed within the draft Core Strategy would accord with the aims of PPS7 because “the focus for most additional housing in rural areas should be on existing towns and identified service centres. But it will also be necessary to provide for some new housing to meet identified local need in other villages.” (para.8). PPS7 states that; “It is essential that local planning authorities plan to meet housing requirements in rural areas” (para.8) Policy WCS6 identifies growth at Maresfield of 10 dwellings. It is considered that Maresfield is well placed to accommodate additional growth; suitable sites have been identified within the Council’s Strategic Housing Land Availability Assessment (SHLAA) which are not divorced from the village and it is accessible by a range of transport methods. However it is submitted that in order to make efficient use of land identified as being potentially suitable to accommodate future housing development within the Strategic Housing Land Availability Assessment a more comprehensive approach to development in Maresfield is required. It is considered that this would better align the draft Core Strategy with national policy particularly the very recently updated Planning Policy Statement 3: ‘Housing’ where it states “Using land efficiently is a key consideration in planning for housing.” (para. 45) By not allocating a larger portion of development to Maresfield the draft Core Strategy would become less ‘sound’ because the development planned under Policy WCS6 would need to take place elsewhere, possibly in a location that does not accord as strongly with the principles for the location of new development established within PPS7. Comments previously made relating to Policy WCS2 are also pertinent here. A ‘sound’ Core Strategy must contain evidence of the views of the local community and others who have a stake in the future of the area. Public comments on the Issues and Options Paper support a general approach within which 30% of new dwellings are allocated to rural areas. The Rural Areas Strategy (WCS6) is deficient because it does not propose a high enough percentage of the total amount of housing to be located in rural settlements in accordance with public opinion. In addition it is not consistent with national policy.

Details of Changes to be Made:

WCS6 Rural Areas Strategy The rural areas comprise the following categories of settlement: Service Centre Local Service Centre Neighbourhood Centre Unclassified settlements Within Service Centres, Local Centres and Neighbourhood Centres (excluding Stone Cross, Polegate and Willingdon and Heathfield) provision will be made for at least 3732 new dwellings. The Delivery and Site Allocations DPD will allocate sites for development sufficient to ensure that the requirements above can be met. Development boundaries will not be retained for settlements classified as a neighbourhood centre or unclassified settlement. Development boundaries will be retained or provided at: Forest Row, Hartfield, Groombridge, Wadhurst, Mayfield, Frant, Buxted, Herstmonceux, Ninfield, Pevensey Bay, Horam, Alfiston, Westham and Rotherfield Development boundaries as shown in the adopted Wealden Local Plan are removed from: Berwick Station, Blackboys, Broad Oak, Cross-in-Hand, East Dean and Friston, East Hoathly, Fairwarp, Five Ash Down, Five Ashes, Framfield, Hadlow Down, Halland, Hoeo Common, Isfield, Lower Dicker, Lower Horsebridge, Maresfield, Mark Cross, Maynards Green, Nutley, Pevensey, Punnetts Town, Upper Dicker, Vines Cross and Windmill Hill Retained or new development boundaries will be reviewed as part of the Strategic Sites and Delivery and Site Allocations DPDs as appropriate. Development will be allocated to settlements classified as Service Centres, Local Service Centres and Neighbourhood Centres within rural areas for the period to 2030 based on the criteria within the Council’s Strategic Housing Land Availability Assessment. It is suggested that Maresfield receives 150 dwellings. This figure is based on Maresfield’s pro rata need for housing. It uses the number of existing households in Maresfield against the total existing households district wide and multiplied by the identified future housing need taken from DCLG forecasts. It has however, been reduced to recognise that footloose new households can be directed into the main towns of the district which would be more sustainable.
Representation ID
487
Person ID  Mrs Larkin  Agent ID
330727 Arlington Parish Council
WCS6 Rural Areas Strategy  Policy 6

Sound  No  Justified  Effective  Consistent with national policy
Legally Compliant  Yes  No

Details of Reasons for Soundess/ Legal Complaince:
Only ten houses are allocated to the village of Upper Dicker. This is unsound and unjustified. St Bede’s Senior School, one of the largest employers in the Wealden District is located in Upper dicker and has already bought a number of homes there for its own use; it also has a brownfield site three on which it may choose to build houses after the development boundary is removed, taking up all or a large part of Upper Dicker’s housing allocation for the foreseeable future. No allocation at all has been made for the village of Arlington.

Details of Changes to be Made:
In table 11 (eleven), allocating housing numbers to the rural villages, the allocation for Upper Dicker should become the allocation for Upper dicker and Arlington and should be increased from ten to thirty.

Representation ID
492
Person ID  Ms Goulden  Agent ID  Mr Ide
522120 Batcheller Monkhouse  335759 Batcheller Monkhouse
WCS6 Rural Areas Strategy  Policy 6

Sound  No  Justified  Effective  Consistent with national policy
Legally Compliant  Yes  No

Details of Reasons for Soundess/ Legal Complaince:
Rural sites may be more constrained, due to topography, landscape, access etc, than those within the built up area. The wording of WCS6 seems to recognise this by implying there should be flexibility in the quantum of new house building within rural areas, as it refers to ‘at least’ 455 dwellings overall. The policy seems therefore to suggest that residential development in the 13 named settlements is a minimum. If so, Fig 11 should reflect this.

Details of Changes to be Made:
Remove settlement banding in notation to Fig 11 of the Core Strategy.
Details of Reasons for Soundness/ Legal Compliance:
The majority of the district is rural area. The Core Strategy recognises that it is important that villages and rural settlements remain vital and that they are sustained throughout the Plan period, so that they can meet their roles as described within the settlement hierarchy of the Plan. The removal of development boundaries from a number of settlements reduces the spread of development within the countryside. Rural Growth Areas shown under Policy WCS6 therefore assume more importance in delivering the Core Strategy. A housing figure of 100 units has been identified for Horam. A number of potentially deliverable sites have been identified in the councils 2010 dated SHLAA for the settlement. The redevelopment of my clients land at Horam to r/o the former Merrydown Cider Factory would tie in with any redevelopment of the factory site. Development here would be upon brownfield land, it could be well integrated with the village and it enjoys good access.

Details of Changes to be Made:
The Horam housing allocation be raised from 100 to 125 units under WCS6.

Details of Reasons for Soundness/ Legal Compliance:
Object to SD1. Unsound, as set out in detailed objections to this site made to that part of the CS document, it is undeliverable, and undeliverable in the set timescale, and unavailable, and will create major town centre congestion problems. Object to SD2. Unsound, as set out in detailed objections to this site made to that part of the CS document, it is undeliverable, undeliverable in the set timescale set and not sustainable. Object to SD3. Unsound, as set out in detailed objections to this site made to that part of the CS document, it is undeliverable, and undeliverable in the set timescale.

Details of Changes to be Made:
Delete SD1 to SD7 and replace with sites that are deliverable and sustainable, as set out in the objectors’ detailed objections. Particularly include land at South Maresfield as detailed in objections for WCS6.
Details of Reasons for Soundess/ Legal Complaince:
This policy fails the SHLAA and other planning criteria as most of the proposed allocated sites have deliverability problems, being either unavailable, undeliverable through access or infrastructure problems, or are in unsustainable locations. These matters are detailed in the separate objections to specific areas, which should be read in conjunction with this objection. But briefly these are: Uckfield, the chosen site has no access, is unavailable, would cause massive town centre congestion. Hailsham and Hellingly, sites are unsustainable as there is no rail transport, undeliverable due to sewage treatment problems, insufficient local employment and car travel only option to overcome this. Polegate and Willingdon undeliverable due to sewage treatment problems. Rural Areas. Village allocations far too low leaving villages to die and just become dormitories for the rich and retired and car owners. Also in particular Maresfield due to the adjacent Ashdown business Park should have a much larger allocation to enable people to live where they work and reduce car travel. This policy also shows what a farce the council have made of the SHLAA, for which there is no challenge objection process, nor does it appear to be independently checked or inspected. The whole point of the SHLAA was to identify land that was deliverable, so allocations could be made from this land. Yet WDC seems to have the opposite and chosen land that is neither available and or deliverable. Also the SHLAA seems to have been completely inconsistently administered, so far instance many sites or villages of very similar nature have very different outcomes in the SHLAA.

Details of Changes to be Made:
Remove the undeliverable sites in Uckfield, Hailsham and Polegate and Willingdon. Increase the village allocations to 2000, as detailed in objections to WCS6 Additionally, change Maresfield to a Local Service Centre and additionally allocate 300 to 400 dwellings for reasons detailed in the objections to WCS2 and WCS6.
This policy is unsound and not justified for housing as the housing figures are far too low given the local and national needs for housing and population growth. The house projection figures at para 3.10 show a need for 16800 by 2030, and additionally WDC's own recent Housing Needs Survey supposedly showed a need for 14000 dwellings by 2026, let alone 2030. These figures appear to have been adjusted/fiddled by local councillor politicians for electoral reasons to come up with the proposed 9600 until 2030. Even these local housing needs surveys are suspect since they did not ask anyone not local if they were palling to move into the area so the council have no idea how many extra people would do this adding to the housing need. This is particularly relevant since any EU national can now come to this country without any restriction or limit. So how many Poles, Romanians, etc were asked if they were planning to come and live in Wealden District. Clearly none, yet it is well recorded that a net 3 million or more EU nationals have come to this country in the last 6 or 7 years. These will all add to the housing need and should be allowed for by every council to take a fair share of these extra people. The council also effectively state that as house building in Wealden District over the last 21 years has been 400 a year, it will continue so for the next 20 despite the changed circumstances currently and looking ahead. Whilst only 400 houses have been built yearly over the last 21 years, this is because that is what the planning system has allowed. The council also have no idea how many extra people would do this adding to the housing need. This is particularly relevant since any EU national can now come to this country without any restriction or limit. Therefore to base the future on a false past in completely wrong. The fact of the matter is that in the last 10 or so years there has been a massive increase in net immigration compared to the 10 years preceding that. The levels of net immigration seen and continuing mean that every 3 to 4 years an extra million people are added to the population, and Wealden will have to accommodate its hare of these and allow for this to continue since most are EU nationals and no UK government has any way of limiting this. Should other countries join the EU, which is also planned during the period to 2030 it is certain even more immigration will occur. It is also a fact that life expectancy has increased significantly in recent times, meaning people live longer and so do not free up houses as they used to because they do not die so early. It is also a fact that more people are living singly and not as couples or families, thus meaning more individual house are needed. Thus all in all it is completely clear that the housing provision is far too low. It is a job to know what national policy is in the current political mess, with proposed changes to the planning system, yet to be enacted into law. However, assuming the aim is to give everyone a decent home to meet their needs this low level of housing provision will only make matters much worse, and do nothing to improve them, so much be against national policy. Employment land. All of the major current employment land allocations are unbuilied and being rolled into this plan. This is the Ashdown Business Park, Hackhurst Lane Industrial Estate and Polegate Business Park. These make up the vast majority of the supposed land allocation, yet they have been allocated for 15 to 20 years, and in contradiction to the council's claim that they are viable, have still yet to be build. Yet during this time a large amount of housing has been built, and even allowing farm building concernsations this would indicate that most occupiers of the new houses are adding to the existing high level of our commuting, and not working locally. So whilst in theory extra land employemtn land is needed for the increased population, there seems little point in allocating extra land when such a high level of the existing allocations have yet to be built.

Details of Changes to be Made:
Housing provision should be increased to 16800 dwellings to match the needs identified in para 3.10. Whilst the council will say there is not the infrastructure for this, this is because they are the incompetent authority for the area not the competent one. They spend all their time fighting against housing development to the detriment of the homeless and poorly housed, never ever produce any of the plans required in the local plan process in the allotted time so delaying decisions massively, k so ending with disjointed and incoherent plans or decision when they are eventually made. Essentially acting in a negative regressive way. A properly competent authority that embraced extra housing development in a positive forward looking way should easily be able to come up with a sensible joined up plan for extra housing that incorporates the provision of the required infrastructure in a proper joined up way and timely way, and would produce a coherent plan in a short space of time, and providing for these extra houses would not be a problem. It is also noted that the council have to allocate broad locations for their chosen house numbers, as detailed in para 5.9, that these figures and allocations do not include windfall sites, which have
averaged 200 dwellings over the past 10 years. Whilst the rate at which these will continue to come forward can only be guessed at, but if it were to be 200 a year that would allow an extra 4000 dwellings without effecting the councils’ proposed sites. Where it to drop to 100 a year this would still be an extra 2000 dwellings in areas other than the allocated sites. This clearly shows there is plenty of scope to increase the housing provisions despite what the council may say. Equally as submitted in regard to policy WCS6 there is good reason and plenty of scope to allow a much larger rural allocation. Employment land. If the housing figures stay as proposed by the council, then the proposed extra provision should not be allocated until construction of 50% of the outstanding allocations has at least started. Unfortunately the planning system cannot make owners and developers built their business units if they consider it unviable to do so, so there is no planning way out of this problem. Equally whilst there is a demand from small business to buy their own freehold sites, a small business cannot fund the huge initial start up costs of roads, services and S106 requirements needed to get these estates going. Clearly should the housing provision be increased additional employment land will be required, but whether the existing or new land would be build out any quicker than it has been up to now will depend entirely on economics, not planning policy.

Representation ID
696
Person ID  Mr  Wilsom
521393  Buxted Parish Council
WCS6 Rural Areas Strategy  Policy 6
Sound  No  Justified  Effective  Consistent with national policy
Legally Compliant  No
Details of Reasons for Soundess/ Legal Complaince:
The removal of the Development boundary in Five Ash Down is known and supported

Details of Changes to be Made:

Representation ID
697
Person ID  Mr  Wilsom
521393  Buxted Parish Council
WCS6 Rural Areas Strategy  Policy 6
Sound  No  Justified  Effective  Consistent with national policy
Legally Compliant  No
Details of Reasons for Soundess/ Legal Complaince:
We note no proposed development for High Hurstwood as a community within the AONB. However we remain concerned that such ‘pickling in aspic’ of communities in the AONB is not sustainable in the long term - indeed the local school, where so much investment has been made to improve facilities, has a time monority of its pupils from High Hurstwood and while some are from the wider Parish, most are in-communting from Crowborough. Within the new drived to Localism we would at least hope that locally supported proposals for development and in particular smaller and affordabel homes (assuming sensible allocation policies for the entire spectrum of local people can be put in place) would be considered positively and that the AONB would not be used as an over-riding negating policy.

Details of Changes to be Made:
Details of Reasons for Soundess/ Legal Complaince:
We note that the Development Boundary in Buxted is being retained apart (we assume from discussions with WDC officers) from the Parish Council proposed and agreed extension to the land west of Church Road which will extend the boundary to the sewage works and the railway line. There is a slight concern that the precise number of new dwellings earmarked for Buxted has not been clearly stated.

Details of Changes to be Made:

Details of Reasons for Soundess/ Legal Complaince:
We are concerned that some of the approaches to allocating development based on 'local services' fail to appreciate the local pressures faced and that such imposition without local support result in fragmented and not sustainable local communities. Buxted has faced massive and rarely good development in such a manner over the last 30-50 years with substantive loss of local services, infrastructure and amenities, and has had to work hard to avoid community fracturing and the resulting anonymous suburbanised commuter-land so redolent of many similar once vibrant communities.

Details of Changes to be Made:

Details of Reasons for Soundess/ Legal Complaince:
Modest sized open market and affordable housing to include key worker accommodation in villages such as Frant and Eridge Green

Details of Changes to be Made:
Details of Reasons for Soundness/ Legal Compliance:
The removal of the Development Boundary is Maresfield is ill conceived. This was never discussed locally and appeared at the last minute without due concern as to what the community wanted. To remove the boundary here would in fact stifle the ambitions of the community to provide affordable homes and new facilities as well as a resolution to the long standing through traffic problems. In fact what should happen is that the development boundary should be retained, indeed it is probably right for the development boundary to be extended to include land that could provide the necessary number of homes that will provide all the housing needs identified further in the proposals. Reclassifying Maresfield as a local service will allow for this to enable local aspirations to be met. Development Boundaries should be reviewed and the local communities aspirations taken into account. Where there is a clear reason for retaining the boundaries and in some cases to extend them, these should be retained in accordance with the Non statutory and Statutory Local Plans (the only legal plan) which currently prevail. The allocation of 50 homes in Maresfield over the period of the LDF is ill founded and in spite of a local decision which, although deciding to only accept 50 homes, there was a caveat to the parish Councils response which said that a larger allocation could be considered if the demands for guaranteed benefits could be secured. In 2009, the council commissioned housing needs survey concerning the nature and extent of our local housing need. 50 homes would not meet demands by local people who wish to remain in Maresfield

Details of Changes to be Made:

Details of Reasons for Soundness/ Legal Compliance:
I refer to BR5 (Biodiversity) Appendix 1 Tables 4 and 5. Table 4 includes Arlington Reservoir as and LNR Table 5 includes Ludlay Coppice as an SNCI The woodland is an important habitat for wildlife and plant species as appears from the enclosed statements by Michael Hawkins and the Rev. Peter Blee. The reason is, of course, that is has not been disturbed for over fifty years. There cannot be many such sites in East Sussex, certainly none on such a large scale. It is essential that it remains undisturbed if we care at all about biodiversity, as we should. This is all the more important because of the woodland's proximity to Arlington Reservoir and Ludlay Coppice. As Mr Hawkins explains in his statement the development of the woodland for housing would inevitably have an adverse impact on the other sites. This would be a tragedy. It should therefore be included in Table 4 or 5. At the very least it should be designated a Biodiversity Opportunity Area, and included in Table 7. For the reasons stated above, the boundary should be reinstated North West of the station.

Details of Changes to be Made:
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<th>Representation ID</th>
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<tr>
<td>672</td>
<td>Mrs Roberts</td>
<td>106740 Chiddingly Parish Council</td>
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<tr>
<td>WCS6 Rural Areas Strategy</td>
<td>Policy 6</td>
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<tr>
<td>Sound</td>
<td>☐ Yes</td>
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<td>Legally Compliant</td>
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**Details of Reasons for Soundness/ Legal Complaince:**

Inconsistency between villages (namely Selmeston, Upper Dicker and Chiddingly) in assessment of growth potential.

**Details of Changes to be Made:**

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<tr>
<td>833</td>
<td>AFZ</td>
<td>533892 AFZ Consulting Limited</td>
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<tr>
<td>WCS6 Rural Areas Strategy</td>
<td>Policy 6</td>
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**Details of Reasons for Soundness/ Legal Complaince:**

We consider that Policy WCS6 is neither justified nor effective for two reasons: 1. The deletion of the development boundaries for only certain categories of settlement (and also only some settlements within the same category) is irrational. Clearly the concept is a sound one, and something that the Council supports in general terms. Removal of the boundaries for some of the smaller settlements, such as Maresfield, will lead to uncertainty; this is particularly the case in terms of identifying sites for future development via other LDF documents, or determining planning applications; and 2. The SHLAA which forms part of the evidence base for this and other Core Strategy policies, is unsound. Specifically, the appraisal of site reference 212/3120 (Land south of Maresfield) is seriously defective. The SHLAA analysis says "The site comprises an area of good quality open landscape on south facing slopes, and with a high visual sensitivity.. In isolation this substantial site is unsuitable as it could create a very large detached development, poorly related to the existing settlement". Notwithstanding the site is included within those sites as considered "suitable" for development. This finding clearly contradicts the analysis. This is a large site, and significant in terms of housing land supply and Policy.

**Details of Changes to be Made:**

The Policy should be amended to confirm that development boundaries will be retained for all category of settlements, or at least Maresfield where 50 dwellings are proposed over the plan period. The SHLAA must be reviewed in respect of the analysis and findings for site reference 212/3120. This site should be reclassified as unsuitable for residential development.
Details of Reasons for Soundess/ Legal Complaince:

1.1 We consider that Policy WCS6 Rural Areas Strategy is unclear as to how development of housing and employment in rural areas is expected to come forward to be sound it should state more clearly how development can be accommodated in rural areas. It should have more regard to national planning policy in PPS3. 1.2 Support for housing development in rural areas comes from Regional Planning Policy in Paragraph 7.5 which states that affordability is a concern in rural areas in the South East, and that there is a "rural premium" for housing. It continues that sustainable communities must be created and maintained in urban and rural areas. Planning Policy Statement 3: Housing (PPS3) under the heading "Providing housing in suitable locations", paragraph 38 states that there is a need to provide housing in rural areas including in vallages to enhance their sustainability. It says "this should include, particularly in small rural settlements, considering the relationship between settlements so as to ensure that growth is distributed in a way that supports informal social networks, assists people to live near their work and benefit from key services, minimise environmental impact and, where possible, encourage environmental benefits". 1.3 Planning Policy Statement 4: Planning for Sustainable Economic Growth (Policy EC6) supports economic activity in rural areas through the conversation of existing buildings, replacement buildings, where it would remedy deficiencies in facilities, and would address social exclusion. Support is to be given to businesses which want to diversity where this is consistent in scale and environmental impact with a rural location. 1.4 Paragraph 6.45 of the Core Strategy states that: "Outside the towns and the rural settlements identified for growth development will be restricted primarily to that required to meet an essential rural need, support rural diversification and sustainability of the countryside, promote tourism or enhance the countryside. More detailed development management policies and proposals will be contained in the Delivery and Site Allocations DPD in relation to development in the countryside. In the meantime the Council will use national policy and retained Local Plan policies to support development management decisions". This paragraph gives more scope for development in rural areas than policy WCS6. We consider that to be the most appropriate strategy the wording of paragraph 6.45 should be in policy WCS6. This would demonstrate that in accordance with national planning policy in PPS3 and regional planning policy that development of housing in areas other than the service centres and local service centres could be appropriate.

Details of Changes to be Made:

Policy WCS6 should include the working "Outside the towns and the rural settlements identified for growth development will be restricted primarily to that required to meet an essential rural need, support rural diversification and sustainability of the countryside, promote tourism or enhance the countryside. More detailed development management policies and proposal will be contained in the Delivery and Site Allocations DPD in relation to development in the countryside. In the meantime the Council will use national policy and retained Local Plan policies to support development management decisions. The Delivery and Site Allocations DPD will consider the opportunities in small rural settlements for considering the relationship between settlements so that housing and employment growth is districuted in a way that supports informal social networks, assists people to live near their work and benefit from key services."
Paragraph 6.45 implies that development promoted in settlements not identified for growth (which is the majority of settlements) would not be supported unless for rural or countryside uses. This is unsound and unsustainable. Policy WCS6 states that development boundaries will be reviewed through later DPD documents, but we consider that they should be considered through the core strategy. WCS6 is therefore ineffective and unsound at present there is insufficient certainty for landowners. Please see the Indigo Planning letter dated 15 April 2011.

**Details of Changes to be Made:**
Policy WCS6 and the proposals map should provide clarity on the proposed revisions to the development boundaries. We consider that the land to the rear of Mountney Bridge Industrial Estate should be included within the Development Boundary, this reflects its previous allocation in the adopted 1998 Local Plan. Please see the Indigo Planning letter dated 15 April 2011, which sets out why this land should be included.

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**Representation ID** 1428

**Person ID** Ms Mears

**Agent ID** Environment Agency

**WCS6 Rural Areas Strategy**

**Sound** ☑ Yes ☑ No ☑ Justified ☑ Effective ☑ Consistent with national policy

**Legally Compliant** ☑ Yes ☑ No

**Details of Reasons for Soundness/ Legal Complianc**e:
We are aware that there is no capacity available at the Windmill Hill Waste Water Treatment Works in Herstmonceux. Policy WCS6 allocates 70 new homes at Herstmonceux so you will need to be satisfied that Southern Water Services can deliver the associated improvements to accommodate this.

**Details of Changes to be Made:**
Waste water capacity for number of homes
Officers at Mid Sussex District Council are continuing to work jointly with Wealden in developing and implementing a strategic and co-ordinated approach to protecting the Ashdown Forest SAC/SPA. Work already undertaken between the two Councils has identified a series of measures to limit the impact of new development on the conservation interests of the Ashdown Forest. These measures include new development contributing to an appropriate level of mitigation in the form of providing Suitable Alternative Natural Green Space (SANGS) and support via developer contributions towards the Ashdown Forest Access Management Strategy. This strategy will need to specify measures for the management of visitors to Ashdown Forest in such a way that reduces their impact on the interest features of the designated site and will need be prepared and implemented in association with the conservators of Ashdown Forest, Natural England and other partners. In addition, further joint working will be required to develop and implement on site management measures to reduce nitrogen emissions emanating from the increased number of vehicles using the roads crossing Ashdown Forest. In combination with this, both Councils through their Local Development Frameworks will also need to delivery initiatives to reduce reliance on the motor vehicle, through creating sustainable communities, providing improvements to public transport, cycling and walking facilities. Pollution monitoring on the Forest will be required to assess the effectiveness of these measures. The recognition of this situation in paragraphs 3.22 6.34 and policy SPO1 is welcomed. The recognition within the Core Strategy of the impact on the Ashdown Forest that development within rural villages (such as Forest Road and Danehill) would have is welcomed. The strategy focussing growth at Uckfield, Crowborough, Heathfield and Hailsham and smaller-scale growth at villages within the Wealden District will go some way to minimising the negative impact development would have on the Ashdown Forest, especially in combination with further mitigation measures (such as SANGS).

Details of Changes to be Made:

Policy WCS6 also refers to the retention of the development boundary in Forest Row. Whilst we recognise that there are overarching strategic requirements across the district as a whole, we feel that the case made by Forest Row Parish Council during the SHLAA process to find sites that met the criteria and enabled limited housing growth should be re-examined when the consultation on development boundaries is being considered. We believe that the development boundary round Forest Row should be re-drawn elastically to allow for the small pockets of land that meet the criteria to be considered in future without the rigidity of the current boundary limiting scope for future growth.

Details of Changes to be Made:

In this context we would like Wealden District Council to reconsider the sites that were proposed using the SHLAA process that the Parish Council felt would enable such growth and that were not in the Floor Plain and were within reasonable access to the village centre.
In view of the fact that by your own criteria Forest Row meets the requirement for additional housing, we would like to re-iterate our view that Forest Row could accommodate up to 100 dwellings - a conclusion drawn from our Masterplan Survey. This is also stated in Appendix 1. Please note that this level of housing would be in addition to the provision of sheltered accommodation to mitigate the loss of the units in Evelyn Clark House.

Details of Changes to be Made:
The following representations are made by Smiths Gore on behalf of the Trustees of the Firle Estate. The Estate are significant local landowners in the southern part of the District as well as in the adjoining part of Lewes District. As such, the Trustees take a great deal of interest in the emerging planning policy framework in Wealden, and are particularly keen that the southern part of the District is developed and allowed to grow in a way that is sustainable and proportionate to the capacity for that part of the District to support additional development. The representations outlined below focus on the Estate’s landholdings in and around the settlement of Berwick Station. As the Council will know, this area has been under consideration for a possible new settlement of 1500-2000 dwellings, indeed being included within the shortlist of three possible locations. It is clear that the presence of the excellent transport links in the form of the location of a well served train station in the Village combined with easy access to the trunk road network via the A27 meant that Berwick is considered a particularly sustainable location for housing growth. Around this time, Atkins was commissioned to assess the capacity of the Village and put forward suggested development options. The Atkins report, Land at Berwick Station: Proposed Rural Housing Development provides a good deal of background which Smiths Gore do not intend to repeat, including the Gage family’s discomfort at the level of growth then being discussed for Berwick. As responsible local landowners and community members, the family feel quite strongly that development of Villages such as Berwick Station should be allowed to happen in an organic, incremental way so as not to overwhelm existing communities or outpace the provision of social and physical infrastructure. That is not to say however, that growth should not be properly planned and the existing Atkins study should perhaps be seen as a much longer term vision of where Berwick Station may wish to head towards. With that in mind, Smiths Gore have been asked to prepare and submit the following representations to the Core Strategy which we hope will be taken into account during the examination of the Development Plan Document. We and the Estate look forward to a continued positive and effective relationship with the Local Development Framework process. Core Strategy Representations Paragraph 3.3, table 1 Policy unsound and not justified or consistent with national policy This paragraph, and the settlement strategy set out in Table 1, is considered to be inconsistent with national policy insofar as it relates to the need to promote sustainable patterns of development, particularly in relation to public transport accessibility and/or means other than the private car (PPS1, PPS3 and PPS7). This is particularly important for Wealden District since, as stated in Para.5.21 of Background Document 1, The Development of Proposed Submission Core Strategy, the many areas of poor public transport accessibility has led to a heavy reliance on the use of the private motor vehicle. It is therefore vitally important that the distribution of development moving forward does not exacerbate this issue. Whilst it is not suggested that public transport accessibility should be the only consideration, it is suggested that the definition of Accessible Settlements set out in the 2009 Spatial Development Options Background Paper Rural Settlement Classification, is perhaps more consistent with national planning policy than the current strategy and should be re-included. In addition, PPS3 requires LPAs to give consideration to the functional relationship between settlements in rural areas, and it is considered that the relative sustainability of smaller settlements that may in themselves have limited facilities, may in fact be greatly enhanced through a close functional relationship with larger dwellings. Arguably therefore, housing growth in such settlements would be as sustainable as development adjoining the urban area of those larger settlements. To use the example of Berwick Station, the extremely close functional relationship with the Primary Centres of Lewes and Eastbourne, make this Village, as well as all villages that are within easy walking of cycling distance such as Alciston, Berwick and Selmaeston much more sustainable that they are if viewed in isolation. Unfortunately the fact that these Primary Centres are located outside of the plan area has meant that this relationship has not been explored more fully. It is also suggested that the Settlement Hierarchy is not justified since it is also not clear how the decisions that led up to the identification of various categories of settlement are supported by evidence. In particular, it would appear that weighting has been afforded to some facilities, for example primary school provision but not to others such as public transport provision that may be more significant indicators of the sustainability of a settlement. However, since no evidence is provided or indeed does there appear to have been any meaningful consultation around this point during earlier rounds of community involvement, it is impossible to counter this assumption. At the same time, the contribution of certain facilities that have been listed in the matrix that was attached to the 2009 Rural Settlement Classification appears to be arbitrary and not necessarily, it is suggested, good indicators of the vitality or indeed capacity for growth of a settlement. Turning to two examples within the south of the District, Horam and Herstmonceaux are both identified within the Rural Strategy for relatively significant levels of growth, 100 and 70 dwellings respectively. However,
neither settlement are served by train stations and whilst bus based public transport is available, it is suggested relying on this mode of transport will not lead to greater uptake of public transport as would be the case if settlements that are served by rail services were identified for a similar level of growth. This is recognised in the Sustainability Assessment that accompanies the Core Strategy where Herstmonceaux in particular scores particularly low on environmental sustainability.

Details of Changes to be Made:

It is suggested that the allocation provided to Berwick is based on both the availability of land, the relative sustainability of the settlement - taking particular note of its high public transport accessibility, and landscape capacity to absorb development. It is suggested that a figure of between 50 and 100 dwellings over the plan period would be more appropriate and help to facilitate sustainable growth of this part of the district.
Details of Reasons for Soundness/ Legal Compliance:

Policy WCS6 – Rural Area Strategy The main thrust of this Policy, as promoted, is to catalogue Wealden settlements by, apparently, population levels. The result will exclude those falling into ‘Neighbourhood Centres and Unclassified settlements’ and representing the major portion (some 57%) of Wealden District land area, from any meaningful residential housing policy. In categorising the various settlements in this way, the district Council ignores the contribution which contained residential development makes to sustaining vibrant rural village communities. In consequence, no less that 27 currently sustainable villages, as recognised in the out going Local Plan, are to be emasculated, preventing all further growth during the period to 2030. The well intentioned and avowed aim of protecting the countryside is acknowledged. However, the abdication of its responsibilities is not an option open to the District Council. The direct effect of Policy WSC6 will cause those villages which are to be given this doubtful protection to stagnate and decay into geriatric dormitories. If this Policy is adopted there can be no interaction for the moribund local communities it creates, through the intake of younger people. The District Council will cite proposed Policy WCS 9, )Rural exception affordable housing), as a source of local housing, in defending the path they have chosen to pursue. Experience has shown that 'exception' housing policies, as entombed in successive Adopted local plans and applied first through housing associations (HAs), then through registered social landlords (RSLs) and more recently, through approved landlords (ALs), have been an almost total failure. The problem is well recognised but never acknowledged by those with the discretion to do something about it. It is this. Any land suitable for 'exception' housing is equally suitable for private housing development. Consequently and with no more land being made available, landowners prefer to retain their holdings, rather than support exception housing, which gives a return of about 1% of what their land would be worth for equivalent private housing development. Land can only be built on once!

Details of Changes to be Made:

We consider the deleted development boundaries should be restored to the 27 villages the District Council seeks to emasculate in proposed Policy WCS6. We refer to Q4 above, and to the preamble in paragraph 5 of the 19th October document. The district Council sets out to achieve housing growth of 400 units per annum. It quotes that number of dwellings per annum for a plan period of 18 years, (2012 to 2030), producing some 7200 homes in total. In analysing the figures proffered in Policy WCS 2, (Distribution of Housing Growth 2006 – 2030), these amount to 8000 dwellings in total and include the commitments already in hand for the period 2006 to 2012. However, these earlier commitments are not confirmed by completions. Taking current national housing performance, completions will be well below commitments. The draft Core Strategy seeks to create an imbalance in favour of family housing in the south of the district. This proposed imbalance take nebulous account of realistic employment prospects for those families who are being ‘designed’ into the southern housing. This imbalance restricts numbers in the north, where there is some prospect of local employment, and in the villages where, were it allowed, there are realistic prospects that developments would actually take place. Directing family housing to the south will hardly assist the adjoining Eastbourne District, which is already an area of low employment. In practice, the District Council’s financial liabilities will be further extended. The draft Core Strategy, in further seeking to restrict residential development to ‘towns only’, creates fundamentally unsound policy. The result is likely to be a sluggish take up and completions which will fall short of the targets set. The high cost of implementing recent changes to building regulations, together with general infrastructure requirements, will further constrain housing development. A lack of local employment in the south will promote out commuting and by car on an antiquated road network, given the lack of alternative public transport. We propose that the probable shortfall in housing completions be computed and the result be evenly distributed between the villages being unfairly shorn of their development boundaries. This will off-set the debilitating effect draft Policy WCS6 will otherwise cause to the district, should it be adopted.
We welcome the identification of Boreham Street as a settlement where the existing settlement boundary can be removed and where additional development can take place to meet the needs of the District. However, WCS6 only identifies the settlement as capable of accommodating an additional 10 dwellings. The SHLAA assessment of my client's land adjoining The Bull's Head PH identified it as a Potentially Suitable Site with the capacity to accommodate 48 dwellings. It is considered that the settlement of Boreham Street can sustainably accommodate more than the 10 dwellings identified in Policy WCS6 and it is proposed that this number should be increased accordingly. This could relieve the pressure on other, smaller settlements possibly less able to accommodate the level of provision envisaged in this policy.

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Rural sites may be more constrained, due to topography, landscape, access etc, than those within the built up area. The wording of WCS6 seems to recognise this by implying there should be flexibility in the quantum of new house building within rural areas, as it refers to 'at least' 455 dwellings overall. The policy seems therefore to suggest that residential development in the 13 named settlements is a minimum. If so, Fig 11 should reflect this. Proposed Change

Remove settlement banding in notation to Fig 11 of the Core Strategy.
The majority of the district is rural area. The Core Strategy recognises that it is important that villages and rural settlements remain vital and that they are sustained throughout the Plan period, so that they can meet their roles as described within the settlement hierarchy of the Plan. The removal of development boundaries from a number of settlements reduces the spread of development within the countryside. Rural Growth Areas shown under Policy WCS6 therefore assume more importance in delivering the Core Strategy. Ninfield is better placed than neighbouring settlements to accommodate development. A housing figure of 50 units has been allocated to Ninfield, but this was set in the context of a number of sites having development potential. My client's land at Ingram's Farm, Ninfield, appears to be the least constrained and it has the capacity to accommodate in excess of 50 units. For all the above reasons, it is recommended that the housing quota for Ninfield is raised. Proposed Change

Details of Changes to be Made:
The Ninfield housing allocation be raised from 50 to 100 units.

Hallam Land Management Limited object to the scale of development at Wadhurst, Herstmonceux, Ninfield, Horam, Maresfield. The allocation at Maresfield being particularly unsustainable on the grounds that this is no more than a neighbourhood centre with only limited facilities.

Details of Changes to be Made:
The scale of development in all of these locations be reduced to a maximum of 25 units, reducing commensurate to the size and scale of the settlement.
Details of Reasons for Soundness/ Legal Complaince:
The majority of the district is rural area. The Core Strategy recognises that it is important that villages and rural settlements remain vital and that they are sustained throughout the Plan period, so that they can meet their roles as described within the settlement hierarchy of the Plan. The removal of development boundaries from a number of settlements reduces the spread of development within the countryside. Rural Growth Areas shown under Policy WCS6 therefore assume more importance in delivering the Core Strategy. At Selmeston there is the opportunity to increase housing provision to 20 units. Proposed Change

Details of Changes to be Made:
The Selmeston housing allocation be raised to 20 units.

Details of Reasons for Soundess/ Legal Complaince:
It is important to understand the relationship between the Council’s settlement hierarchy, proposed Rural Growth Areas (Figure 11) and proposed amendments to settlement boundaries (WCS6). If the relationship is unclear, the Core Strategy is unclear. The SHLAA is predominantly ‘site centred’; Rural Growth Areas need to consider the impact individual sites, most often identified in the SHLAA, will have upon a village / rural settlement. Designation of a village / rural settlement as a Growth Area indicates that there will be development for new housing with infrastructure to support it over a substantial time frame (up to 2030). The Core Strategy proposes to continue to apply countryside constraints to neighbourhood centres. To achieve this, some Growth Areas identified in Figure 11 in the Plan will have their development boundaries removed; other Growth Areas will not have development boundaries defined. There is a risk these policies could work against each other. In combination, these policies send out a mixed message to residents in the villages concerned – on the one hand, it is indicated that rural character will be preserved and yet on the other, with Growth Area designation, that there will be change with some degree of urbanisation. Proposed Change

Details of Changes to be Made:
That Growth Areas indentified in Figure 11 have development boundaries retained and Growth Areas presently without development boundaries have boundaries defined in later DPDs, with consequential amendments made to Paras 3.6 and 3.7.
Details of Reasons for Soundess/ Legal Complaince:
Policy 6 is unsound because: 1. The development boundary for Berwick Station should be retained. To remove it will encourage development on greenfield sites, including an archaeologically sensitive area considered for scheduling as a Ancient Monument by English Heritage. 2. The number of new houses proposed for Berwick Station is disproportionally high, representing over 25% growth in the size of the settlement.

Details of Changes to be Made:
Either this part of the strategy should be reconsidered or Berwick Station should be recategorised as an "Unclassified Settlement".

Details of Reasons for Soundess/ Legal Complaince:
Support housing growth at Ninfield, as this will help support the 'secondary centre' role of Bexhill.

Details of Changes to be Made:
A key test of ‘soundness’ for Wealden’s Core Strategy is conformity with national planning policy. Planning Policy Statement 7: ‘Sustainable Development in Rural Areas’ (PPS7) is particularly relevant in regard to Policy WCS6 because “the focus for much additional housing in rural areas should be on existing towns and identified service centres. But it will also be necessary to provide for some new housing to meet identified local need in other villages.” (para. 8). PPS7 states that; “It is essential that local planning authorities plan to meet housing requirements in rural areas” (para. 8) Policy WCS6 identifies growth at East Dean of 10 dwellings during the plan period. It is considered that East Dean is well placed to accommodate additional growth; suitable sites have been identified within the Council’s Strategic Housing Land Availability Assessment (SHLAA) which are not divorced from the village and it is accessible by a range of transport methods. However it is submitted that in order to make efficient use of land identified as being potentially suitable to accommodate future housing development within the Strategic Housing Land Availability Assessment a more comprehensive approach to development in East Dean is required. It is considered that this would better align the draft Core Strategy with national policy particularly the very recently updated Planning Policy Statement 3: ‘Housing’ where it states “Using land efficiently is a key aspect of what the plan says regarding the Sussex Coast Policy Area identified within the Regional Spatial Strategy for the South East. The ‘Sussex Coast and Towns’ was also a Priority Area for Economic Regeneration in RPG9 therefore it can be seen that this is an area where regeneration has been a priority for a long period of time. It is the present government’s stated intention to revoke the South East Plan however the issues within the Sussex Coast Policy Area will remain. The South East Plan was tested extensively and went through numerous consultations. It is important that the thrust of what the plan says regarding the Sussex Coast Policy Area is manifested in the Core Strategy in order to address the identified weakness of the area. A particular challenge identified within the South East Plan that is faced by the Sussex Coast Policy Area is, inter alia, to “deliver sufficient decent homes and provide a well integrated mix to meet the needs of the area” (para. 17.2) The South East Plan proposes that approximately 63% of Wealden’s new housing development is located in the Sussex Coast Sub-Region. The draft Core Strategy is in accordance with this as at present approximately 63% of new allocations (excluding rural areas) are within the Sussex Coast Policy Area. It is noted however that only approximately 42% of new housing allocations under policy WCS6 will be directed towards rural areas within the Sussex Coast Policy Area as defined in the Wealden Profile (2009). It is accepted that there are factors including land supply, the sub-region’s high environmental quality and nationally designated landscapes that may constrain development. None the less it is submitted that a higher proportion of Wealden’s future housing growth be directed towards the Sussex Coast Policy Area to address its need, specifically to “deliver sufficient decent homes” (para. 17.2) (South East Plan), particularly in rural areas. The South East Plan specifically refers to rural areas within the Sussex Coast Policy Area. “As well as the coastal towns, the sub-region includes the immediate rural hinterland which extends into the Sussex Downs AONB (which is to be replaced by the South Downs National Park) and High Weald AONB, and includes protected coastal areas.” (para. 17.1) It is important that the needs of this rural hinterland, which includes East Dean, are not neglected and as such it is submitted that a higher proportion of development be allocated to rural areas within the Sussex Coast Policy Area. The Managing the Delivery of Housing Background Paper (February 2011) confirms that the housing register and the housing needs assessment are both indicators of housing need. Planning Policy Statement 7: ‘Sustainable Development in Rural Areas’ states: “It is essential that local planning authorities plan to meet housing requirements in rural areas, based on an up to date assessment of local need.” (para. 8) East Dean & Friston Parish is identified within the Managing the Delivery of Housing Background Paper at appendix 1 as having 9 households on the housing register as of June 2010. Appendix 2 has regard to the housing needs
assessment and gives estimated gross needs per annum. East Dean & Friston is estimated to have a gross need per annum of 7 dwellings. At present there is a clear requirement for housing in East Dean and Friston which is not addressed sufficiently by Policy WCS6. The Core Strategy is therefore unsound because it does not take account of its evidence base and is not consistent with national policy. In addition the Managing the Delivery of Housing Background Paper recognises that “many households, although in housing need, do not apply to the local authority for housing.” (para. 6.10) therefore it is considered that the housing need in East Dean and Friston may actually be much higher than shown above. It is submitted that a larger portion of housing growth be allocated to East Dean and Friston to meet an identified need. The Managing the Delivery of Housing Background Paper states: “Policies in the Core Strategy can assist in ensuring the provision of affordable housing through the requirement for market housing to provide a proportion of affordable homes” (para. 6.15) It is considered that through the allocation of a larger portion of market housing through Policy WCS6, essential local affordable housing needs can be addressed. Under the heading planning for housing policy objectives Planning Policy Statement 3: ‘Housing’ states that the specific outcomes the planning system should deliver are, inter alia “A mix of housing, both market and affordable, particularly in terms of tenure and price, to support a wide variety of households in all areas, both urban and rural” and “A sufficient quantity of housing taking into account need and demand and seeking to improve choice.” (para. 10) The Wealden Profile 2009 informs that “The Parish with the highest proportion of detached properties as a percentage of its total dwellings is East Dean and Friston, with 80.4 %.” (para. 2.4) It is clear that East Dean requires additional housing development over the 10 dwellings allocated in Policy WCS6 in order to address the severe bias towards expensive, detached properties in the area. At present the draft Core Strategy is not sound as it is not consistent with the above national policy.

Details of Changes to be Made:

WCS6 Rural Areas Strategy The rural areas comprise the following categories of settlement: Service Centre Local Service Centre Neighbourhood Centre Unclassified settlements Within Service Centres, Local Centres and Neighbourhood Centres (excluding Stone Cross, Polegate and Willingdon and Heathfield) provision will be made for at least 3732 new dwellings. The Delivery and Site Allocations DPD will allocate sites for development sufficient to ensure that the requirements above can be met. Development boundaries will not be retained for settlements classified as a neighbourhood centre or unclassified settlement. Development boundaries will be retained or provided at: Forest Row, Hartfield, Groombridge, Wadhurst, Mayfield, Frant, Buxted, Herstmonceux, Ninfefield, Pevensey Bay, Horam, Alfriston, Westham and Rotherfield Development boundaries as shown in the adopted Wealden Local Plan are removed from: Berwick Station, Blackboys, Broad Oak, Cross-in-Hand, East Dean and Friston, East Hoathly, Fairwarp, Five Ash Down, Five Ashes, Framfield, Hadlow Down, Halland, Hooe Common, Isfield, Lower Dicker, Lower Horsebridge, Maresfield, Mark Cross, Maynards Green, Nutley, Pevensey, Punnetts Town, Upper Dicker, Vines Cross and Windmill Hill Retained or new development boundaries will be reviewed as part of the Strategic Sites and Delivery and Site Allocations DPDs as appropriate. Development will be allocated to settlements classified as Service Centres, Local Service Centres and Neighbourhood Centres within rural areas for the period to 2030 based on the criteria within the Council’s Strategic Housing Land Availability Assessment. It is suggested that East Dean receives 75 dwellings. This figure is based on East Dean’s pro rata need for housing. It uses the number of existing households in East Dean against the total existing households district wide and multiplied by the identified future housing need taken from DCLG forecasts. It has however, been reduced to recognise that footloose new households can be directed into the main towns of the district which would be more sustainable.
The District Council’s starting point for the distribution of housing in rural areas is the classification of settlements, their ability to meet the day to day needs of their inhabitants and the accessibility to services either within or outside those settlements. This has been carried out in a matrix format, so that each settlement can be compared with its neighbour within the district. This work was initially set out in background paper 6 to the Issues and Options document dated July 2009. It has been carried forward into Background Paper 1 and its appendices 3 and 4. One would therefore expect development to be directed to those settlements most able to meet the day to day needs of their populations, or to meet needs currently unmet. There appears little consistency in the approach taken by the Proposed Submission Core Strategy to the distribution of housing around the rural areas of the district. The settlement hierarchy approach adopted is designed to ensure that ‘those places that have the greatest amount and range of employment, community facilities and support services, and which are best served by public transport’ (paragraph 3.3) means that Wealden’s residents can access services whilst minimising the need to travel. The Core Strategy states that ‘evidence confirms that if more sustainable patterns of living are to be promoted, the large majority of future planned growth in Wealden needs to be focussed on the towns and larger villages in the hierarchy, where facilities, services and site opportunities exist’ (para 3.4) Nevertheless, some of the rural settlements singled out for housing growth do not comply with this principle. Some Service Centres and Local Service Centres have been earmarked for growth; some have not. Some Neighbourhood Centres have been earmarked for growth; others with extremely good accessibly links are not only excluded from development, but have had their development boundaries removed to exclude any windfall development. Village Position in Hierarchy Number of new homes Five Ash Down Neighbourhood Centre 0 Development boundary removed Wadhurst Service Centre 70 Frant Local Service Centre 20 Herstmonceax Local Service Centre 70 Ninfield Local Service Centre 50 Horam Local Service Centre 100 Maresfield Neighbourhood Centre 50 East Dean Neighbourhood Centre 10 Berwick Station Neighbourhood Centre 20 Cross in Hand Neighbourhood Centre 25 Boreham Street Neighbourhood Centre 10 Ripe Neighbourhood Centre 10 Seldeston Neighbourhood Centre 10 Upper Dicker (Arlington Parish) Neighbourhood Centre 10 A total of 145 dwellings have been allocated in Neighbourhood Centres, similar to Five Ash Down. Some of the settlements indicated for development are heavily environmentally constrained (for example within the National Park, High Weald Area of Outstanding Natural Beauty or close to the Ashdown Forest). Some are extremely small (for example Boreham Street and Cross in Hand). The allocated sites and the settlement hierarchy do not appear to match the Core Strategy statement that the allocations are limited to towns and larger villages. Given that, there appears to be no particular justification for those settlements singled out for growth. As commented on above, there is an acute level of housing need in the district. The impact of high residential values in rural areas contributes to poor population age and skills profiles of rural populations, leading to decline in rural populations and hence rural services. Planning Policy Statement 3 emphasises the need to address rural housing needs in paragraph 30; ‘In providing for affordable housing in rural communities, where opportunities for delivering affordable housing tend to be more limited, the aim should be to deliver high quality housing that contributes to the creation and maintenance of sustainable rural communities in market towns and villages. This requires planning at local and regional level adopting a positive and pro-active approach which is informed by evidence, with clear targets for the delivery of rural affordable housing.’ The Strategic Housing Market Assessment indicated that more affordable housing could be delivered in the central and northern parts of the district. On sites such as 71/72 Coopers Row in Five Ash Down a higher proportion of affordable housing could be delivered, unconstrained by marketability problems. The Proposed Submission Core Strategy examines housing need on a parish by parish basis. One would expect that the parishes singled out for housing growth would be those demonstrating higher levels of housing need. The following table compares the level of housing need for those parishes singled out for development against Buxted Parish. NOTE: Buxted parish includes the villages of Buxted and Five Ash Down. The figures are not broken down into villages. Parish Housing register Housing needs assessment Gross need p.a. Number of homes proposed Buxted (Five Ash Down) 21 21 22 0 Development boundary removed Wadhurst 67 63 62 70 Frant 26 9 14 20 Herstmonceax 42 3 3 70 Ninfield 23 6 13 50 Horam 26 14 19 100 Maresfield 21 41 23 50 East Dean 9 20 7 10 Berwick Station 1 4 1 20 Cross in Hand (Heathfield and Waldron parish) No info No info No info 25 Boreham Street Herstmonceux parish) No info No info No info 10 Ripe 2 0 4 10 Seldeston 0 4 3 10 Upper Dicker 0 0 0 10 There appears to be no correlation between levels of housing need and the distribution of housing growth. In my opinion, the level of housing need does not justify the distribution of housing growth. The parish by parish breakdown of housing need does not provide the justification
for the distribution of housing in rural areas. When I examine the infrastructure constraints on development, I would expect the parishes constrained by infrastructure to be excluded from potential growth. This is not the case. There appear to be no infrastructure constraints in the Five Ash Down area, that cannot be overcome by developer contributions. This is in contrast to the severe infrastructure constraints in South Wealden (waste water treatment works, particularly in respect of the Pevensey Levels Habitat Directive and transport constraints). Indeed the Strategic Housing Market Assessment noted that the market was buoyant in the central and northern parts of the district and could accommodate higher levels of developer contributions. There appears to be no correlation between those parishes/villages singled out for growth and those with infrastructure constraints. The removal of development boundaries on all the settlements excluded for growth diminishes flexibility and deliverability, should the constraints in other areas restrict growth in an unforeseen manner, or indeed if the infrastructure provided in the southern part of the district is not delivered. Five Ash Down, Buxted Parish Five Ash Down is one of two settlements within Buxted Parish. A further development at the former Mayhew chicken factory, known as Ashdown Place, is being developed for residential development, as a satellite to Five Ash Down. Its relatively isolated relationship to the village means that it is unlikely to contribute to local services. In the settlement hierarchy, Five Ash Down is listed as a Neighbourhood Centre. Five Ash Down (as distinct from Buxted village or Ashdown Place) enjoys these facilities: • Convenience store • Post Office • Place of Worship • Community Hall • Locally significant business area • Broadband access Five Ash Down is located directly on one of the best bus routes in the district, the 29 Regency Route which travels half hourly throughout the week from Tunbridge Wells to Brighton City Centre, taking in Crowborough, Uckfield and Lewes. This bus provides excellent access to the secondary and primary schools of Uckfield (within a 10 minute journey) as well as accessing local primary and secondary centres. Buxted is a settlement within the same parish. It is classed as a Local Service Centre. It is a short bus ride or walk from Five Ash Down and enjoys a main line train station and primary school as well as local; shops and employment. Five Ash Down lies just 1m north of Uckfield, one of the major towns of the District, and a major centre for growth. Uckfield is listed in the hierarchy as a District Centre. Land at Coopers Row Although individual sites are not being considered at this point in the Local Development Framework process, it is worth reiterating that suitable land in the village is available, achievable and suitable. The land at Coopers Row has been declared deliverable by the Strategic Housing Land Availability Assessment. It has been demonstrated that the land can make a significant contribution to life in the village by providing much needed open space. A potential housing layout has been indicated that is attractive and permeable, integrating with the existing village and with local footpath links. Accessibility to existing shops and services, as well as the excellent bus route, is key to the success and the sustainability of the site. The site could accommodate sufficient housing to create a village with a heart, and sufficient affordable housing to address the identified need. The landowner continues to develop a close relationship with the Parish Council and is working with the parish on a layout which reflects village needs. In my opinion therefore the distribution of housing in rural areas is not justified, and the evidence points to a more equitable distribution around the villages. The approach taken leaves many rural communities devoid of sufficient development to address affordability and sustainability. The application of the settlement hierarchy appears flawed and inconsistent. Settlements selected for growth appear unrelated to status, size, constraints or needs. Whereas Planning Policy Statement 3 provides some emphasis on the needs of villages, this has been overlooked in the Core Strategy. The delivery approach is inflexible and will falter if the infrastructure is not provided in the south of the district of in the principal towns. As a result I find the Proposed Submission Core Strategy unsound in relation to the PPS12 test of soundness.

Details of Changes to be Made:

WCS6 Rural Areas Strategy The rural areas comprise the following categories of settlement: Service Centre Local Service Centre Neighbourhood Centre Unclassified settlements Within Service Centres, Local Centres and Neighbourhood Centres (excluding Stone Cross, Polegate and Willingdon and Heathfield) provision will be made for at least 3042 new dwellings. The Delivery and Site Allocations DPD will allocate sites for development sufficient to ensure that the requirements above can be met. Development boundaries will not be retained for settlements classified as a neighbourhood centre or unclassified settlement. Development boundaries will be retained or provided at: Forest Row, Hartfield, Groombridge, Wadhurst, Mayfield, Frant, Buxted, Herstmonceux, Ninfield, Pevensey Bay, Horam, Alfriston, Westham and Rotherfield Development boundaries as shown in the adopted Wealden Local Plan are removed from: Berwick Station, Blackboys, Broad Oak, Cross-in-Hand, East Dean and Friston, East Hoathly, Fairwarpe, Five Ash Down, Five Ashes, Framfield, Hadlow Down, Halland, Hoe Commone, Isfield, Lower Dicker, Lower Horsebridge, Maresfield, Mark Cross, Maynards Green, Nutley, Pevensey, Punnetts Town, Upper Dicker, Vines Cross and Windmill Hill Retained or new development boundaries will be reviewed as part of the Strategic Sites and Delivery and Site Allocations DPDs as appropriate. Development will be allocated to settlements classified as Service Centres, Local Service Centres and Neighbourhood Centres within rural areas for the period to 2030 based on the criteria within the Council’s Strategic Housing Land Availability Assessment. It is suggested that Buxted Parish, in particular Five Ash Down is suitable to receive a proportion of the District’s housing growth, particularly when considered in relation to my previous comments regarding the overall figure for housing development and the proportion of the overall figure which needs to be distributed to rural areas.
POLICY WCS 6 Rural Areas Strategy

On behalf of our client, objection is raised to the above policy as modified by the published Errata on the basis that it is unsound. It is considered that the policy as worded is not justified, as it is not consistent with the stated objectives of the DPD; it is not founded on a credible evidence base, as it fails to examine the available sites at the individual settlements; it is not consistent with national planning policy in that it does not foster a sustainable pattern of development and provide for the continued viability of existing settlements. Tests of Soundness

The draft Core Strategy confirms that half of the local population is resident in the rural area beyond the main towns (para 2.6) and acknowledges that the challenge for the CS is to focus growth where it is most accessible and sustainable whilst maintaining the balance between rural settlements and larger service centres (para 2.7). The need to reflect the relative sustainability of the existing rural settlements in the strategy is explicit in this. Accordingly, it is confirmed in the document that the spatial strategy should recognise that some of the settlements could support some development to meet the needs of the local communities (para 2.7). In this context, it is noted that in other settlements in less sustainable locations additional growth would encourage more travel and out commuting (ibid). We draw attention to the fact that this strategy is therefore dependent on the relative sustainability of the individual settlements. It follows that the more sustainable settlements should be the focus for development if a sustainable pattern of development is to be created. It is noted in the CS that in order to reduce social inequalities it is necessary to ensure accessibility to services and to determine the best pattern of development across the District to ensure it is sustainable and supports the future role and function of settlements (para 2.18). The functions of the various settlements have been set out (see Table 1) with the role of larger settlements being confirmed. Whilst some development may be appropriate at Neighbourhood Centres, we note that these are categorised as settlements with limited, basic or no facilities but with access to another centre or where there are facilities but poor access to other centres. In both cases the introduction of further development is proposed at a relatively unsustainable settlement when compared to others that have a greater level of access to services including a supply of employment. As a result, we consider that the emphasis on new development allocations should be focused on those settlements that are regarded as more sustainable, notably the Service Centres and Local Service Centres. The draft policy seeks to accommodate a significant amount of development at Neighbourhood Centres (we calculate some 32% of the rural total), which in our view is substantial. It also involves development of a significant scale at certain locations such as Maresfield, Berwick Station and Cross-in-Hand. By excluding those remaining Service Centres and Local Service Centres from the allocation list, we consider that the strategy fails to promote the continued functioning of these and will not foster a sustainable pattern of development. On this basis, we consider that it is not justified by the needs of the population or the identified future role of the individual settlements. The CS notes that evidence confirms that ‘if more sustainable patterns of living are to be promoted, the large majority of future planned growth needs to be focused on the towns and larger villages in the hierarchy where facilities, services and site opportunities exist’. (para 3.4). The proposed split of new allocations within the selected rural settlements does not reflect these considerations in our view. In terms of the spatial planning objectives in the plan it is the case that SPO3 acknowledges that ‘the majority of new housing will be accommodated within, or as sustainable extensions to, existing towns, while allowing for limited growth within those villages capable of accommodating development in a sustainable fashion’. The proposed distribution simply fails to do this as in many cases it involves development that is proposed at the less sustainable settlements. In respect of the rural area it is proposed under SPO8 ‘to maintain and where appropriate enhance through the encouragement of growth, the effective network of villages that will continue to support the day to day needs of our rural communities, and which will accommodate some additional growth where this would be sustainable’. The need to promote development in sustainable locations therefore places an emphasis on those villages that are already sustainable, such as Local Service Centres. The proposed pattern of development in WCS6 fails to do this and is therefore not justified. Effective In order to be effective the policies and proposals need to be capable of being delivered. As part of the rural strategy, it is an objective of the plan to foster and enhance through development the functioning of existing settlements in order to provide for the needs of the rural based population (which is significant). This strategy requires a supportive approach to development if it is to be effective. The draft plan seeks to limit new allocations whilst relying on the continued development of sites within existing settlements to supplement this additional supply. It is therefore proposed to retain a number of existing development boundaries first established in the adopted Local Plan of 1998. In our view, retention of the existing development boundaries will only serve to prevent beneficial

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**Sound**
- Yes
- No
- Justified
- Effective
- Consistent with national policy

**Legally Compliant**
- Yes
- No

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**Details of Reasons for Soundness/ Legal Compliance:**

POLICY WCS 6 Rural Areas Strategy

On behalf of our client, objection is raised to the above policy as modified by the published Errata on the basis that it is unsound. It is considered that the policy as worded is not justified, as it is not consistent with the stated objectives of the DPD; it is not founded on a credible evidence base, as it fails to examine the available sites at the individual settlements; it is not consistent with national planning policy in that it does not foster a sustainable pattern of development and provide for the continued viability of existing settlements. Tests of Soundness

Justified

The draft Core Strategy confirms that half of the local population is resident in the rural area beyond the main towns (para 2.6) and acknowledges that the challenge for the CS is to focus growth where it is most accessible and sustainable whilst maintaining the balance between rural settlements and larger service centres (para 2.7). The need to reflect the relative sustainability of the existing rural settlements in the strategy is explicit in this. Accordingly, it is confirmed in the document that the spatial strategy should recognise that some of the settlements could support some development to meet the needs of the local communities (para 2.7). In this context, it is noted that in other settlements in less sustainable locations additional growth would encourage more travel and out commuting (ibid). We draw attention to the fact that this strategy is therefore dependent on the relative sustainability of the individual settlements. It follows that the more sustainable settlements should be the focus for development if a sustainable pattern of development is to be created. It is noted in the CS that in order to reduce social inequalities it is necessary to ensure accessibility to services and to determine the best pattern of development across the District to ensure it is sustainable and supports the future role and function of settlements (para 2.18). The functions of the various settlements have been set out (see Table 1) with the role of larger settlements being confirmed. Whilst some development may be appropriate at Neighbourhood Centres, we note that these are categorised as settlements with limited, basic or no facilities but with access to another centre or where there are facilities but poor access to other centres. In both cases the introduction of further development is proposed at a relatively unsustainable settlement when compared to others that have a greater level of access to services including a supply of employment. As a result, we consider that the emphasis on new development allocations should be focused on those settlements that are regarded as more sustainable, notably the Service Centres and Local Service Centres. The draft policy seeks to accommodate a significant amount of development at Neighbourhood Centres (we calculate some 32% of the rural total), which in our view is substantial. It also involves development of a significant scale at certain locations such as Maresfield, Berwick Station and Cross-in-Hand. By excluding those remaining Service Centres and Local Service Centres from the allocation list, we consider that the strategy fails to promote the continued functioning of these and will not foster a sustainable pattern of development. On this basis, we consider that it is not justified by the needs of the population or the identified future role of the individual settlements. The CS notes that evidence confirms that ‘if more sustainable patterns of living are to be promoted, the large majority of future planned growth needs to be focused on the towns and larger villages in the hierarchy where facilities, services and site opportunities exist’. (para 3.4). The proposed split of new allocations within the selected rural settlements does not reflect these considerations in our view. In terms of the spatial planning objectives in the plan it is the case that SPO3 acknowledges that ‘the majority of new housing will be accommodated within, or as sustainable extensions to, existing towns, while allowing for limited growth within those villages capable of accommodating development in a sustainable fashion’. The proposed distribution simply fails to do this as in many cases it involves development that is proposed at the less sustainable settlements. In respect of the rural area it is proposed under SPO8 ‘to maintain and where appropriate enhance through the encouragement of growth, the effective network of villages that will continue to support the day to day needs of our rural communities, and which will accommodate some additional growth where this would be sustainable’. The need to promote development in sustainable locations therefore places an emphasis on those villages that are already sustainable, such as Local Service Centres. The proposed pattern of development in WCS6 fails to do this and is therefore not justified. Effective In order to be effective the policies and proposals need to be capable of being delivered. As part of the rural strategy, it is an objective of the plan to foster and enhance through development the functioning of existing settlements in order to provide for the needs of the rural based population (which is significant). This strategy requires a supportive approach to development if it is to be effective. The draft plan seeks to limit new allocations whilst relying on the continued development of sites within existing settlements to supplement this additional supply. It is therefore proposed to retain a number of existing development boundaries first established in the adopted Local Plan of 1998. In our view, retention of the existing development boundaries will only serve to prevent beneficial
development by maintaining areas of existing development and will therefore preclude delivery of rural development in sustainable locations. It is confirmed that ‘in order to sustain our larger, and more sustainable, villages the retention of development boundaries will allow a flexible approach in the provision of employment and other services and facilities’ (para 6.48). It is evident that the policy as drafted seeks to retain the development boundaries set out in the existing Local Plan for a number of sustainable settlements. These boundaries have been established for a long period and additional potential within them is strictly limited. In our view this approach will completely negate the potential of these settlements as it is prejudicial to the introduction of further development. Settlement boundaries were identified in the adopted Local Plan of 1998 and reflected in the informal review of 2005. This means that any potential development sites that were contained within these areas have long since been identified and implemented. Whilst it is notable that windfall sites have made a contribution in the past, we consider that these would have been sought at the height of recent economic cycles and are unlikely to be viable or achievable now. Examination of the existing boundaries reveals that in many cases they have been drawn tightly to prevent the outward expansion of settlements and contain only developed areas with further policy restrictions on intensification in certain places for reasons of townscape quality. Retaining existing boundaries will not provide for development opportunities and will not therefore provide a flexible approach. In our view the exact opposite is likely with the perpetuation of a highly restrictive policy framework that will prevent the delivery of much needed development in sustainable settlements. As drafted, policy WCS6 will thus prevent the delivery of sustainable development and will therefore not be effective in securing beneficial development to meet the needs of local communities in sustainable locations. This restrictive approach will preclude the delivery of the rural strategy as set out. Contrary to national policy PPS1 ‘Delivering Sustainable Development’ confirms that ‘sustainable development is the core principle underpinning planning’ (para 2). As part of the preferred approach it is confirmed that ‘planning should facilitate and promote sustainable and inclusive patterns of urban and rural development by (inter alia) ensuring that development supports existing communities and contributes to the creation of safe, sustainable, liveable and mixed communities with good access to jobs and key services for all members of the community’ (para 5). It follows from this that the CS must adopt an approach that accommodates development at the most sustainable settlements if a sustainable pattern of development is to be achieved in rural locations. In the absence of this, the draft policies will fail to secure the preferred approach as advocated by national planning policies. Part of this approach must be to co-ordinate housing development with the ability to provide for local jobs and services. The more sustainable villages are therefore those that combine the existence of services with access to employment provision. This places an emphasis on those settlements that have a better range of facilities, such as the Service Centres and the Local Service Centres as identified in the plan. It is also confirmed that ‘plans should be drawn up with community involvement and present a shared vision and strategy of how the area should develop to achieve more sustainable patterns of development’ (para 7). The requirement to promote greater levels of sustainability in rural areas is an integral part of this approach and needs to be adopted through the plan-making process. The identification of the more sustainable villages as Service Centres and Local Service Centres reflects community wishes and needs to form the basis of the strategy. Accordingly, it is confirmed that development plans should ‘promote development that creates socially inclusive communities’ and policies should (inter alia) ‘address accessibility (both in terms of location and physical access) for all members of the community to jobs, health, housing, education, shops, leisure and community facilities’ (para 16). This requirement places an emphasis on the need to maintain the functioning of the larger rural settlements given that these provide for the main services that are available to rural communities at a local level. The de-facto restriction on development at those settlements where development boundaries are proposed to be retained is unlikely to improve the accessibility of the services found in these and thus is contrary to national policies that seek to promote accessibility and inclusiveness. Under PPS3 ‘Housing’ 2010 it is the case that ‘the delivery of housing in rural areas should (provide) high quality housing that contributes to the creation and maintenance of sustainable rural communities…’ (para 3). In order to achieve this it is a requirement that housing is developed in suitable locations ‘which offer a range of community facilities and with good access to jobs, key services and infrastructure’ (para 36). In our view the failure of the plan to provide for new development at the larger villages is not consistent with this stance as it promotes development in unsustainable locations. It is confirmed that in identifying locations for development ‘the location of housing should facilitate the creation of communities of sufficient size and mix to the development of and sustain community facilities, infrastructure and services’ (para 38). The current proposals for the expansion of some of the neighbourhood centres under policy WCS6 is considered to be contrary to these considerations given the recognition that the level of services in these settlements is basic at best. Whilst it is agreed that the identification of sites for rural development are not of a strategic nature and therefore do not need to be allocated in the Core Strategy, there is already strong evidence that the housing market in the northern area of the District is strong and that demand here is causing problems for affordability. Although some sites may have been promoted through the SHLAA, the relative small scale of provision in rural locations is capable of being addressed through the updated evidence base for the Delivery & Site Allocations DPD. Excluding settlements through the retention of development boundaries at this stage is therefore not in accordance with the advocated criteria based approach (see para 38). The draft CS should therefore avoid prejudicing the detailed assessment of potential development sites at sustainable settlements as these can be more appropriately dealt with through the subsequent DPD.
Details of Changes to be Made:

REPRESENTATIONS ON THE WEALDEN LOCAL DEVELOPMENT FRAMEWORK POLICY WCS 6 Rural Areas Strategy

It is submitted that draft policy WCS6 should read as follows; ‘WCS6 Rural Areas Strategy The rural areas comprise the following categories of settlement: Service Centre Local Service Centre Neighbourhood Centre Unclassified Settlements Within Service Centres, Local Service Centres and Neighbourhood Centres (excluding Stone Cross, Polegate and Willingdon and Heathfield) provision will be made for at least 455 new dwellings (net). The Delivery & Site Allocations DPD will allocate sites for development sufficient to ensure that the requirements above can be met. Development boundaries as shown in the adopted Wealden Local Plan are removed from Service Centres, Local Service Centres and Neighbourhood Centres. New development boundaries will be reviewed for these settlements as part of the Strategic Sites and Delivery and Site Allocations DPD’s as appropriate. It is not proposed to retain or provide development boundaries for settlements that are categorised as unclassified. The following are selected settlements classified as Service Centres, Local Service Centres or Neighbourhood Centres where suitable sites have already been identified. The table indicates the proposed scale of additional housing development to be allocated in these settlements up until 2030: Name New Housing Allocations (Net Additional Dwellings) Wadhurst 70 Frant 20 Herstmonceux 70 Ninfield 50 Horam 100 Maresfield 50 East Dean 10 Berwick Station 20 Cross-in-Hand 25 Boreham Street 10 Ripe 10 Selmeston 10 Upper Dicker 10

In the light of the detailed boundary review in the Strategic Sites and Delivery and Site Allocations DPD’s, in all of the categorised Service Centres, Local Service Centres and Neighbourhood Centres further housing development of an appropriate scale on currently unidentified sites will be permitted at these settlements to supplement the overall supply’.
POLICY WCS 6 Rural Areas Strategy

On behalf of our client, objection is raised to the above policy as modified by the published Errata on the basis that it is unsound. It is considered that the policy as worded is not justified, as it is not consistent with the stated objectives of the DPD; it is not founded on a credible evidence base, as it fails to examine the available sites at the individual settlements; it is not consistent with national planning policy in that it does not foster a sustainable pattern of development and provide for the continued viability of existing settlements. The above reasons are expanded on below. Tests of Soundness

Justified

The draft Core Strategy confirms that half of the local population is resident in the rural area beyond the main towns (para 2.6) and acknowledges that the challenge for the CS is to focus growth where it is most accessible and sustainable whilst maintaining the balance between rural settlements and larger service centres (para 2.7). The need to reflect the relative sustainability of the existing rural settlements in the strategy is explicit in this. Accordingly, it is confirmed in the document that the spatial strategy should recognise that some of the settlements could support some development to meet the needs of the local communities (para 2.7). In this context, it is noted that in other settlements in less sustainable locations additional growth would encourage more travel and out commuting (ibid). We draw attention to the fact that this strategy is therefore dependent on the relative sustainability of the individual settlements. It follows that the more sustainable settlements should be the focus for development if a sustainable pattern of development is to be created. It is noted in the CS that in order to reduce social inequalities is it necessary to ensure accessibility to services and to determine the best pattern of development across the District to ensure it is sustainable and supports the future role and function of settlements (para 2.18). The functions of the various settlements have been set out (see Table 1) with the role of larger settlements being confirmed. Whilst some development may be appropriate at Neighbourhood Centres, we note that these are categorised as settlements with limited, basic or no facilities but with access to another centre or where there are facilities but poor access to other centres. In both cases the introduction of further development is proposed at a relatively unsustainable settlement when compared to others that have a greater level of access to services including a supply of employment. As a result, we consider that the emphasis on new development allocations should be focused on those settlements that are regarded as more sustainable, notably the Service Centres and Local Service Centres. The draft policy seeks to accommodate a significant amount of development at Neighbourhood Centres (we calculate some 32% of the rural total), which in our view is substantial. It also involves development of a significant scale at certain locations such as Maresfield, Berwick Station and Cross-in-Hand. By excluding those remaining Service Centres and Local Service Centres from the allocation list, we consider that the strategy fails to promote the continued functioning of these and will not foster a sustainable pattern of development. On this basis, we consider that it is not justified by the needs of the population or the identified future role of the individual settlements. The CS notes that evidence confirms that if more sustainable patterns of living are to be promoted, the large majority of future planned growth needs to be focused on the towns and larger villages in the hierarchy where facilities, services and site opportunities exist’. (para 3.4). The proposed split of new allocations within the selected rural settlements does not reflect these considerations in our view. In terms of the spatial planning objectives in the plan it is the case that SPO3 acknowledges that ‘the majority of new housing will be accommodated within, or as sustainable extensions to, existing towns, while allowing for limited growth within those villages capable of accommodating development in a sustainable fashion’. The proposed distribution simply fails to do this as in many cases it involves development that is proposed at the less sustainable settlements. In respect of the rural area it is proposed under SPO8 ‘to maintain and where appropriate enhance through the encouragement of growth, the effective network of villages that will continue to support the day to day needs of our rural communities, and which will accommodate some additional growth where this would be sustainable’. The need to promote development in sustainable locations therefore places an emphasis on those villages that are already sustainable, such as Local Service Centres. The proposed pattern of development in WCS6 fails to do this and is therefore not justified. Effective In order to be effective the policies and proposals need to be capable of being delivered. As part of the rural strategy, it is an objective of the plan to foster and enhance through development the functioning of existing settlements in order to provide for the needs of the rural based population (which is significant). This strategy requires a supportive approach to development if it is to be effective. The draft plan seeks to limit new allocations whilst relying on the continued development of sites within existing settlements to supplement this additional supply. It is therefore proposed to retain a number of existing development boundaries first established in the adopted Local Plan of 1998. In our view, retention of the existing development
boundaries will only serve to prevent beneficial development by maintaining areas of existing development and will therefore preclude delivery of rural development in sustainable locations. It is confirmed that ‘In order to sustain our larger, and more sustainable, villages the retention of development boundaries will allow a flexible approach in the provision of employment and other services and facilities’ (para 6.48). It is evident that the policy as drafted seeks to retain the development boundaries set out in the existing Local Plan for a number of sustainable settlements. These boundaries have been established for a long period and additional potential within them is strictly limited. In our view this approach will completely negate the potential of these settlements as it is prejudicial to the introduction of further development. Settlement boundaries were identified in the adopted Local Plan of 1998 and reflected in the informal review of 2005. This means that any potential development sites that were contained within these areas have long since been identified and implemented. Whilst it is notable that windfall sites have made a contribution in the past, we consider that these would have been sought at the height of recent economic cycles and are unlikely to be viable or achievable now. Examination of the existing boundaries reveals that in many cases they have been drawn tightly to prevent the outward expansion of settlements and contain only developed areas with further policy restrictions on intensification in certain places for reasons of townscape quality. Retaining existing boundaries will not provide for development opportunities and will not therefore provide a flexible approach. In our view the exact opposite is likely with the perpetuation of a highly restrictive policy framework that will prevent the delivery of much needed development in sustainable settlements. As drafted, policy WCS6 will thus prevent the delivery of sustainable development and will therefore not be effective in securing beneficial development to meet the needs of local communities in sustainable locations. This restrictive approach will preclude the delivery of the rural strategy as set out. Contrary to national policy PPS1 ‘Delivering Sustainable Development’ confirms that ‘sustainable development is the core principle underpinning planning’ (para 2). As part of the preferred approach it is confirmed that ‘planning should facilitate and promote sustainable and inclusive patterns of urban and rural development by (inter alia) ensuring that development supports existing communities and contributes to the creation of safe, sustainable, liveable and mixed communities with good access to jobs and key services for all members of the community’ (para 5). It follows from this that the CS must adopt an approach that accommodates development at the most sustainable settlements if a sustainable pattern of development is to be achieved in rural locations. In the absence of this, the draft policies will fail to secure the preferred approach as advocated by national planning policies. Part of this approach must be to co-ordinate housing development with the ability to provide for local jobs and services. The more sustainable villages are therefore those that combine the existence of services with access to employment provision. This places an emphasis on those settlements that have a better range of facilities, such as the Service Centres and the Local Service Centres as identified in the plan. It is also confirmed that ‘plans should be drawn up with community involvement and present a shared vision and strategy of how the area should develop to achieve more sustainable patterns of development’ (para 7). The requirement to promote greater levels of sustainability in rural areas is an integral part of this approach and needs to be adopted through the plan-making process. The identification of the more sustainable villages as Service Centres and Local Service Centres reflects community wishes and needs to form the basis of the strategy. Accordingly, it is confirmed that development plans should ‘promote development that creates socially inclusive communities’ and policies should (inter alia) ‘address accessibility (both in terms of location and physical access) for all members of the community to jobs, health, housing, education, shops, leisure and community facilities’ (para 16). This requirement places an emphasis on the need to maintain the functioning of the larger rural settlements given that these provide for the main services that are available to rural communities at a local level. The de-facto restriction on development at those settlements where development boundaries are proposed to be retained is unlikely to improve the accessibility of the services found in these and thus is contrary to national policies that seek to promote accessibility and inclusiveness. Under PPS3 ‘Housing’ 2010 it is the case that ‘the delivery of housing in rural areas should (provide) high quality housing that contributes to the creation and maintenance of sustainable rural communities...’ (para 3). In order to achieve this it is a requirement that housing is developed in suitable locations ‘which offer a range of community facilities and with good access to jobs, key services and infrastructure’ (para 36). In our view the failure of the plan to provide for new development at the larger villages is not consistent with this stance as it promotes development in unsustainable locations. It is confirmed that in identifying locations for development ‘the location of housing should facilitate the creation of communities of sufficient size and mix to justify the development of and sustain community facilities, infrastructure and services’ (para 38). The current proposals for the expansion of some of the neighbouring centres under policy WCS6 is considered to be contrary to these considerations given the recognition that the level of services in these settlements is basic at best. Whilst it is agreed that the identification of sites for rural development are not of a strategic nature and therefore do not need to be allocated in the Core Strategy, there is already strong evidence that the housing market in the northern area of the District is strong and that demand here is causing problems for affordability. Although some sites may have been promoted through the SHLAA, the relative small scale of provision in rural locations is capable of being addressed through the updated evidence base for the Delivery & Site Allocations DPD. Excluding settlements through the retention of development boundaries at this stage is therefore not in accordance with the advocated criteria based approach (see para 38). The draft CS should therefore avoid prejudicing the detailed assessment of potential development sites at sustainable settlements as these can be more appropriately dealt with through the subsequent DPD.
Details of Changes to be Made:

REPRESENTATIONS ON THE WEALDEN LOCAL DEVELOPMENT FRAMEWORK POLICY WCS 6 Rural Areas Strategy

It is submitted that draft policy WCS6 should read as follows; ‘WCS6 Rural Areas Strategy

The rural areas comprise the following categories of settlement: Service Centre Local Service Centre Neighbourhood Centre Unclassified Settlements Within Service Centres, Local Service Centres and Neighbourhood Centres (excluding Stone Cross, Polegate and Willingdon and Heathfield) provision will be made for at least 455 new dwellings (net). The Delivery & Site Allocations DPD will allocate sites for development sufficient to ensure that the requirements above can be met. Development boundaries as shown in the adopted Wealden Local Plan are removed from Service Centres, Local Service Centres and Neighbourhood Centres. New development boundaries will be reviewed for these settlements as part of the Strategic Sites and Delivery and Site Allocations DPD’s as appropriate. It is not proposed to retain or provide development boundaries for settlements that are categorised as unclassified. The following are selected settlements classified as Service Centres, Local Service Centres or Neighbourhood Centres where suitable sites have already been identified. The table indicates the proposed scale of additional housing development to be allocated in these settlements up until 2030:

<table>
<thead>
<tr>
<th>Name</th>
<th>New Housing Allocations (Net Additional Dwellings)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Wadhurst</td>
<td>70</td>
</tr>
<tr>
<td>Frant</td>
<td>20</td>
</tr>
<tr>
<td>Herstmonceux</td>
<td>70</td>
</tr>
<tr>
<td>Ninfield</td>
<td>50</td>
</tr>
<tr>
<td>Horam</td>
<td>100</td>
</tr>
<tr>
<td>Maresfield</td>
<td>50</td>
</tr>
<tr>
<td>East Dean</td>
<td>10</td>
</tr>
<tr>
<td>Berwick Station</td>
<td>20</td>
</tr>
<tr>
<td>Cross-in-Hand</td>
<td>25</td>
</tr>
<tr>
<td>Boreham Street</td>
<td>10</td>
</tr>
<tr>
<td>Ripe</td>
<td>10</td>
</tr>
<tr>
<td>Selmeston</td>
<td>10</td>
</tr>
<tr>
<td>Upper Dicker</td>
<td>10</td>
</tr>
</tbody>
</table>

In the light of the detailed boundary review in the Strategic Sites and Delivery and Site Allocations DPD’s, in all of the categorised Service Centres, Local Service Centres and Neighbourhood Centres further housing development of an appropriate scale on currently unidentified sites will be permitted at these settlements to supplement the overall supply’.

Representation ID

353

Person ID  Mr Burrough

Agent ID  Mr Ide

WCS6 Rural Areas Policy 6

Sound  Yes No Justified Effective Consistent with national policy

Legally Compliant  Yes No

Details of Reasons for Soundness/ Legal Compliance:

Rural sites may be more constrained, due to topography, landscape, access etc, than those within the built up area. The wording of WCS6 seems to recognise this by implying there should be flexibility in the quantum of new house building within rural areas, as it refers to ‘at least’ 455 dwellings overall. The policy seems therefore to suggest that residential development in the 13 named settlements is a minimum. If so, Fig 11 should reflect this.

Proposed Change

Details of Changes to be Made:

Remove settlement banding in notation to Fig 11 of the Core Strategy.
## Representation ID 333

<table>
<thead>
<tr>
<th>Person ID</th>
<th>Agent ID</th>
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<tbody>
<tr>
<td>Mr Green</td>
<td>WCS6 Rural Areas Policy 6</td>
</tr>
</tbody>
</table>

**Details of Reasons for Soundness/ Legal Compliance:**

Point 6.48: "Each rural settlement will be considered on its own merit in following DPDs." together with blanket removal of development boundaries and allocation of housing for neighbourhood centres and smaller settlements does not seem to be a particularly coherent strategy. Villages such as Upper Dicker, with the potential for "in-migration" and prosperity provided by St Bedes school should have more than 10 houses allocated. It is marked on the map as adjacent to a major tourism destination. In addition, this should be the time to encourage development of homes in the southern quadrant of the area, that on which the village school stands. The allocation of homes across the rural areas, at 455, is too low. How else are we to encourage retention of residents who are of working age and stop them from migrating out of the area altogether? Housing development should be aimed at keeping families together.

**Details of Changes to be Made:**

This policy is inconsistent in how it addresses rural development: Focussing on larger towns, but then intending to use predominantly greenfield sites for this is surely a contradiction and would undoubtedly change the nature of the area by encouraging "urban sprawl". It makes more sense to encourage development over the area as a whole, which would prevent further collapse of our rural villages.

## Representation ID 1732

<table>
<thead>
<tr>
<th>Person ID</th>
<th>Agent ID</th>
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<tbody>
<tr>
<td>Haffenden</td>
<td>Mr Lander</td>
</tr>
</tbody>
</table>

**Details of Reasons for Soundness/ Legal Compliance:**

Inadequate allocations to rural areas. Inappropriate to remove development boundary at Framfield. SECTION SEVEN - RURAL AREAS STRATEGY 7.1 Policy WCS6 (taking into account the errata published on 24th February 2011) sets out a strategy for rural areas. Our submissions on this matter rely on the material set out in Section Three of this Statement in respect of the settlement hierarchy. Also relevant is the need to increase housing provision overall (Policy WSC1).

**Details of Changes to be Made:**

7.2 We consider that Policy WCS6 is unsound in the following respects: · housing provision in rural areas should be increased from 455 dwellings in accordance with the need to increase housing provision in the District overall; · a development boundary should be maintained at Framfield; · Framfield should be added to the table of settlements with a new allocation of 50 dwellings; · Figure 11 should be amended accordingly. Increase housing provision. Retain Framfield as a settlement with a development boundary and identify it as a settlement with an allocation of 50 dwellings. Amend Figure 11 accordingly.
<table>
<thead>
<tr>
<th>Representation ID</th>
<th>1733</th>
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<tbody>
<tr>
<td>Person ID</td>
<td>Mr Wheeler</td>
</tr>
<tr>
<td>ID</td>
<td>107137</td>
</tr>
<tr>
<td>Agent ID</td>
<td>Maresfield Conservation Group</td>
</tr>
<tr>
<td>WCS6 Rural Areas</td>
<td>Policy 6</td>
</tr>
<tr>
<td>Strategy</td>
<td></td>
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</table>

**Details of Reasons for Soundess/ Legal Complaince:**

the question of Development Boundaries was never put forward for consultation and indeed was only raised at a very late state, with very little free discussion in council, before this Porposed Submission was produced. We deplore this. “Distinction between towns and villages, where development may be appropriate and smaller settlements where protection of the countryside would normally take precedence”. The current (non-statutory) Wealden Local Plan lists 39 villages with development boundaries. (para.19.50). some are quite small settlements (e.g. Fairwarp) where further development is clearly inappropriate, and where removal of the development boundary is probably correct. The proposed new Core Strategy (WC S6) retains development boundaries for 14 villages and removes them from 13. However in some cases the rationale behind retaining or removing development boundaries is unclear, as in the case of Buxted where the boundary is retained and Maresfield where it is removed. We wish to see the Development Boundary retained for Maresfield for the following reasons: · The village has grown considerably over the past 20 years by extension and infill, and by virtue of its strategic position, remains under considerable development pressure. We are not advocating major new development but wish to see further development properly controlled for the benefit of the village as a whole. · The Ashdown Business Park (see para. 3.21) to the immediate west of the village has now received planning consent, and as it develops should provide considerable employment for the village. · The village is strategically placed at the intersection of the major east-west and north-south routes, and as a direct result of this has relatively very good bus services in most directions (as compared with Buxted for example) which would be further enhanced. We note that one of the aims of the Core Strategy (see SPD.7) is to reduce private car usage, and consider the development of frequent and reliable bus services, is almost certainly the way to achieve this. Regretfully rail services in this part of Wealden can very limited impact on the local need to travel. · Although the village has limited facilities at present, it has all the elements of a vibrant community, primary school, church, village shop and post office. · There is general support for a small number of new homes in this village (Maresfield) over and above the 80 provided for in the current non-statutory Local Plan. Almost certainly this will require some extension of a retained Development Boundary.

**Details of Changes to be Made:**

<table>
<thead>
<tr>
<th>Representation ID</th>
<th>1754</th>
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<tbody>
<tr>
<td>Person ID</td>
<td>Janet McInnes</td>
</tr>
<tr>
<td>ID</td>
<td>106031</td>
</tr>
<tr>
<td>Agent ID</td>
<td>Herstmonceux Parish Council</td>
</tr>
<tr>
<td>WCS6 Rural Areas</td>
<td>Policy 6</td>
</tr>
<tr>
<td>Strategy</td>
<td></td>
</tr>
</tbody>
</table>

**Details of Reasons for Soundess/ Legal Complaince:**

Herstmonceux Parish Council supports the need for a mix of housing in the parish with a particular need for supported housing for older residents.
### Details of Reasons for Soundness/ Legal Complaince:
For Herstmonceux I don’t believe we should build along the road from the village hall to Collins garage, we should not allow the road side to become a new row of houses. Wealden may say that they don’t like the idea of houses being built on the land towards Lime park going down the lane besides the new houses and building opposite the recreation ground, the view is not seen by the people but would be great for those in houses there, but I suggest a tiered development as enclosed. The Windmill hill plan at the monkey puzzle has enough houses; this site where the garage still stands should be a social centre for the people in the area. That’s to say accommodation for a couple of families that can be on site to have a coffee shop, library, youth club open every evening, a place for young and older people that can be for a number of events.

### Details of Changes to be Made:
Conclusion Whilst the strategy plan will appear to have a lot of effort put into it, as it stands it would be a disaster if implemented and I would like to see the secretary of state to call in a public inquiry

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### Details of Reasons for Soundness/ Legal Complaince:
Village Housing Whilst some villages have been mentioned in the strategy document I feel every village should be allowed to take a number of houses for those people who grow up in those areas and the affordability should be retained and work units should be provided, possible old farm buildings can be adapted to this. While I do appreciate this is happening in some places more sites could be made available.

### Details of Changes to be Made:
Conclusion Whilst the strategy plan will appear to have a lot of effort put into it, as it stands it would be a disaster if implemented and I would like to see the secretary of state to call in a public inquiry
These representations are made on behalf of Rookwood Trinity Limited, owners of the Non-Statutory Plan Policy V5 site: West of Oakleigh, Five Ash Down. Our comments relate only to the Rural Areas Strategy and in particular the failure to allocate any new development to Five Ash Down under Policy WCS6 and the proposal under that policy to remove the Development Boundary from the village. Inconsistencies in the Rural Areas Strategy make it unsound. If adopted in its present form it could lead to development in relatively unsustainable locations while preventing any new development in relatively sustainable and accessible settlements such as Five Ash Down. Five Ash Down is an example of a settlement with a range of services, close proximity and excellent accessibility to a district centre, Uckfield. In early LDF publications, Five Ash Down was considered suitable for further growth as, indeed, it was in the Non-Statutory Plan where our client’s site was allocated for housing development under Policy V5. In this draft Core Strategy document, Five Ash Down is not proposed for development and it is proposed to remove the present development boundary. This represents a complete reversal of policy from the allocation of a site at Five Ash Down in the non-statutory plan and recognising it as a village with growth potential in early LDF consultation documents. The reasons for such a fundamental change of policy are unclear and ill-founded. This shift appears to be based first on inconsistencies and factual errors in the methodology on which the present draft policy is based and secondly on unsound overemphasis on “parish aspirations”. Methodology 1. Accessibility The “Development of the Proposed Submission Core Strategy Background Paper” Appendix 3 deals with the categorisation of Wealden settlements in terms of public/sustainable transport (including the quality and frequency of those services). The first category “Very Good Accessibility”, the highest category, is defined as “frequency of 30 minutes or less and duration of travel of 30 minutes or less by public/sustainable transport”. Brighton & Hove Transport service 29/29A, which runs between Brighton and Tunbridge Wells, passes through Five Ash Down with a half hour service throughout the day. This provides access to primary and secondary schools, Uckfield Rail Station, Uckfield town centre and to the subregional shopping centres of Brighton and Tunbridge Wells as well as Crowborough and Lewes. The travel times for the facilities referred to in the methodology are significantly less than 30 minutes. On this basis, Five Ash Down should be classified as having very good accessibility. While the Settlement Facilities Matrix in Appendix 4 of the background paper correctly shows Five Ash Down having very good accessibility, in Appendix 3 it is shown as having only “fair accessibility”. The draft policy on Five Ash Down appears to be based on this incorrect assessment. The benefit of a good regular bus service is not always given sufficient emphasis in assessing the sustainability of settlements in comparison with rail services. Many rural bus services are slow, circuitous and infrequent. By contrast Service 29/29A, which serves Five Ash Down half hourly, is regular, frequent and connects the village to the services and facilities of Uckfield and other centres. It provides a greater contribution to accessibility to non-car modes of travel than the rail services in Wealden which mainly provide long distance connections. 2. Services The Settlement Facilities Matrix correctly shows Five Ash Down having a convenience store, post office, public house, place of worship, community hall, business areas and “other locally significant employment opportunities”. However, it shows the village as not having a primary school. In fact, Buxted CE Primary School, lies within walking distance approximately 1 km from the A26 – A272 traffic lights at Five Ash Down. The primary school is in fact slightly closer to Five Ash Down than to most of the village of Buxted lying approximately equidistant between the two. Buxted CE Primary School is, therefore, equally or more accessible to Five Ash Down than it is to the village of Buxted itself. In addition, the No. 29 bus service provides access to primary schools in Uckfield. The Settlement Facilities Matrix also shows it as having no children’s play area whereas the new Ashdown Place development has a children’s play area which is not confined to the residents of that estate alone. Proposals for development of the West of Oakleigh site included provision of additional playspace. If the Policy V5 allocation is confirmed in the forthcoming Site Specific DPD, additional playspace could be provided close to the centre of the village. 3. Assessment of Growth Potential Chapter 8 of the Development of the Proposed Submission Core Strategy Background Paper includes “Table 2 – Rural Growth Potential”, which contains an appraisal of growth potential for those rural settlements that are either accessible or have some facilities. Five Ash Down is classified as a Neighbourhood Centre. The analysis is complicated by the fact that some of the assessments are on a village/settlement basis and others on a parish basis. Five Ash Down lies within Buxted Parish and is, therefore, denied a voice of its own in this context. One of the criteria – “Parish Council Favoured Option” – states: “No further development due to current allocations.” However, the footnote indicates that this comment was taken from responses to the Spatial Development Options consultation in July 2009 and in any event the reference to “current allocations” can only mean the allocations in the Wealden Local Plan and the
Non-Statutory Plan, including the Policy V5 allocation at Five Ash Down. The analysis recognises that Five Ash Down is “well related to Uckfield with good connectivity and future employment opportunities” and that “development in this area is sustainable by virtue of links with Uckfield by public transport and employment provision in the area could meet wider housing needs”. The conclusion of “no growth potential” for Five Ash Down is at odds with that analysis and is based on the statement that development is “not compatible with Parish aspirations and significant growth could lead to a change in the hierarchy or settlements”. This conclusion contradicts the preceding analysis. The Parish’s apparent assumption that the Non-Statutory Local Plan allocated sites will be developed is not consistent with a conclusion that will result in the Policy V5 allocation site at Five Ash Down not being developed.

Details of Changes to be Made:
In summary, the Rural Areas Strategy needs further refinement and the correction of factual errors and inconsistencies. Five Ash Down has “Very Good Accessibility” and a good range of local services and facilities. On this basis it should be considered suitable for further modest growth and its development boundary should be retained. Five Ash down does not neatly fit the criteria of Neighbourhood Centre defined in the document and background paper. The development of sustainable sites such as the Policy V5 site at Five Ash Down should not be precluded by Core Strategy Policy. The Council has previously judged the site suitable for allocation for low density development. At that time, the density policy for the site was inconsistent with national density guidelines in PPS3. Those density guidelines have now been removed and there is nothing to prevent the Council from revisiting the policy at its own density preference. That would be supported by the landowner.
5.2 Issues

5.2.1 Th the option. Support was made for growth in Maresfield and for a change to the boundary to the south of the village another issue. Did the options being consulted upon actually reflect the question the Council was trying to ask, i.e.; should development boundaries be removed from some settlements? If this is the case, and consultees have submitted responses unaware of this, then the consultation undertaken must be flawed. Question 5a is perhaps the closest to asking the question about removal, but it is clearly couched in the context of growth and development, i.e.; should they be maintained, reflecting the status quo, or expanded to allow for growth. The question does not ask whether the boundaries should be removed. 5.2.11 Either way, it is clear from the officer recommendation based on the responses to the 2007 consultation (see page 60 ) that settlement boundaries are a positive planning tool and should be retained. There is no mention of removal: 'It would appear that, from the comments received, settlement boundaries are a positive planning policy tool and as an initial recommendation that they should be retained. It is preferable, taking into account the comments raised, that any review of development boundaries should be comprehensive in nature with transparent criteria and consultation . In addition
to the use of settlement boundaries, there appears to be some agreement to allowing development in the countryside to meet local need and this will also need to be considered’. 5.2.12 This recommendation also refers to the use of transparent criteria and consultation when reviewing development boundaries. We can not see (a) any evidence of what transparent criteria have been employed to suggest that the development boundaries should be removed, nor (b) what consultation was undertaken that expressly asked whether the boundaries should be removed. 5.2.13 Para 4.40 of the paper prepared under Agenda Item 8 of the LDF sub Committee on 15th October 2007 states: (i) There is a need for a comprehensive review of boundaries to reflect the current situation on the ground, with appropriate community involvement; (ii) A balance needs to be found between preventing urban sprawl, preventing town cramming and not stifling the development needs of individual communities, particularly where no specific allocations are envisaged. The High Weald AONB Unit was amongst those considering boundaries to have been applied too rigidly and that they have not necessarily taken into account the historic pattern of village development. (iii) That any redefinition of settlement boundaries should have regard to the need to retain the distinct and separate identify of nearby settlements; (iv) Not to limit appropriate design and force high densities in locations where new development is proposed; (v) There could be a need for settlement boundaries to be drawn for villages not identified for growth in any event; (vi) There could be a need to redraw more tightly the boundaries for certain villages, a view shared (cautiously) by the South Downs Joint Committee. (vii) The need for well-defined and systematic criteria for defining settlement boundaries and for the selection of settlements where settlement boundaries should be applied. 5.2.14 This response: (a) acknowledges support for the retention of settlement boundaries; (b) that, even in those settlements where there would be no growth, settlement boundaries are required; and (c) there is a need for a well-defined and systematic criteria for defining settlement boundaries and where they should be applied. It is quite clear that there is no intention to remove development boundaries and, in fact, the consultation strengthened the rationale for retention and, where appropriate, modification and expansion. 5.2.15 The 2009 Spatial Options consultation presents options in regard to the quantum and distribution of growth across the District, but does not present options about settlement boundaries nor ask whether they should be removed. 5.2.16 Although responses were made to the 2009 consultation in terms of the level of growth that might be appropriate and which spatial growth option should be progressed, there is no specific response which states that the Maresfield development boundary should be removed.

Details of Changes to be Made:

SUMMARY 5.2.17 In conclusion, we contend that the Core Strategy is unsound because: 1. it is not justified because (i) it is not based on evidence as no question was asked and (ii) it has not been considered against alternatives; 2. it is not effective, because it is not flexible; and 3. it is not consistent with national policy, specifically that set out in the Local Growth White Paper. 5.2.18 Representations made in previous sections indicate that the level of housing growth set out in the submission Core Strategy is too low, that the housing distribution and trajectory should be reconsidered, and that Maresfield is a suitable and sustainable location to accommodate additional housing growth. We thus suggest that Maresfield should (a) have a settlement boundary, and (b) that this should be drawn to allow for additional housing growth.
Paragraph 7.2

Details of Reasons for Soundess/ Legal Complaince:

7.2 states 'the fundamental principle is that development that generates a need for infrastructure or enhancements to existing infrastructure will only be permitted if the necessary infrastructure to support it is already in place, or there is a reliable mechanism to ensure that it will be provided at the right time, when it is needed.' WJPC seeks assurances that this fundamental principle will be applied prior to the commencement of any development identified in SD4.

Details of Changes to be Made:

PTC has no confidence that necessary infrastructure will be provided in the future, as this has not been the case with the Wealden Local Plan and the Wealden non statutory plan, development has been allowed without the infrastructure being in place.
Details of Reasons for Soundess/ Legal Complaince:

3. We agree with the underlying objectives for the housing trajectory to ensure that there is a continuous supply of new housing over the plan period that takes account of market conditions, the ability for communities to assimilate new development and the provision of the necessary infrastructure. However whilst Policy WCS5 does include flexibility in itself, and this is implicit in the housing trajectory (figure 4) which is referred to in Policy WCS5, the status of figure 5 is unclear and the wording in paragraph 5.16 reduces the flexibility. For example, it is suggested that development at south Polegate and east Willingdon (SD4) will be phased to commence from 2019 to enable integration of development in relation to transport infrastructure requirements and interventions in south Wealden. Transport analysis undertaken on behalf of our client suggests there may well be scope for some development before this date. We do not consider there is any advantage in artificially delaying the commencement of development if there is no good reason to do so. This approach would be consistent with paragraph 7.4 where it is stated that development should make the most effective use of existing infrastructure. It is possible to phase housing development to take advantage of existing infrastructure and ensure a satisfactory supply of housing is achieved and development should not be hindered by more strategic infrastructure concerns. One of the advantages of the area identified for growth in Polegate is that it will integrate more naturally into the existing built form, rather than satellite locations with intervening movement constraints such as main roads etc, will help to minimise the use of cars and therefore will create less need for highway infrastructure improvements. 4. The infrastructure constraints of the various Strategic Development Areas in the Core Strategy will become clearer through the Strategic Site Allocations DPD and we consider that more detailed phasing guidance should await this document and not be included in the Core Strategy. In addition the introduction of the Community Infrastructure Levy by 2014 may give better opportunities to fund transport (and other) infrastructure than has been the case in the past. In addition, Policy WCS7 (Effective Provision of Infrastructure) ensures that the release of land for development is conditional upon there being sufficient capacity in the existing local infrastructure to meet the requirements generated by the proposed development.

Details of Changes to be Made:
The County Council strongly supports this policy. In particular it considers it is important that the release of land for development will be conditional upon there being sufficient capacity in the existing local infrastructure to meet the requirements generated by the proposed development, or that there is an agreed programme for delivery of new infrastructure which will ensure that improvements are provided at the time they are needed. The planned growth in the Core Strategy requires additional education provision and a number of transport interventions identified as critical in the Infrastructure Delivery Plan (IDP). There is at this stage, a level of uncertainty about their deliverability. County Council advice on education provision needs to be updated due to variations made to the spatial distribution of growth in the agreed Wealden District Council Submission Strategy. There has not been enough time so far for transport interventions to have been appropriately designed and costed, so there is a risk that they could fail to be delivered, either because the cost (once assessed) exceeds the available funding, or because the intervention itself proves unacceptable. Although these uncertainties present some risks to the strategy they are not so unreasonable to make the strategy unsound, because WCS7 provides a fundamental safeguard on the provision of infrastructure by making the release of land for development conditional upon infrastructure capacity being assured. The Core Strategy needs to be updated to take account of the Coalition Government’s embrace of the Community Infrastructure Levy (CIL) as the appropriate mechanism for securing development contributions. Wealden District Council will need to decide the area, or areas over which a CIL will operate as well as the possible need for cross-boundary co-operation (for example with Eastbourne).

**Details of Changes to be Made:**
Details of Reasons for Soundess/ Legal Complaince:
Legally Compliant - Possibly We appreciate that the ‘larger settlements outside the District exert a significant influence in terms of providing for jobs, health care, leisure, further education and shopping.’ (para.2.3) However, this paragraph should also include access to arts and cultural activities and, nevertheless, the document does not reflect the aspirations of the Cultural Activities and Leisure section of the Community Strategy 2007 which could be included in Policy WCS7 and will therefore be ineffective. Also the document is missing a section to give information on the monitoring and implementation of the Core Strategy policies. In order to assess whether the Core Strategy has helped achieve its objectives it is important that the Council monitors the impact of the policies. The accompanying text throughout mentions the arrangements for managing and monitoring delivery but the document is missing a section on this important matter.

Details of Changes to be Made:
Your revised 2007 Community Strategy states on page 6 that the people of Wealden will be provided ‘with access to a broad range of opportunities to improve their quality of life including …. and the arts’. The same paragraph goes on to say that Wealden will encourage ‘a range of local cultural and arts opportunities.’ Objective SPO11 of the Core Strategy recognises the ‘shortfalls in open space, leisure and recreational facilities within the District ….’ But this objective doesn’t refer to arts and cultural opportunities – the word ‘arts’ doesn’t appear anywhere in the document and ‘cultural’ only appears regarding ‘cultural assets’ and ‘cultural heritage’ both of which refer to green infrastructure. Paragraph 6.38 on page 47 of the Core Strategy states that a community building will be provided for Crowborough but there are policies for the main towns to provide guidance on future developments. We would expect Policy WCS7 to make some reference to specific deficits of community facilities in the District - the strategic infrastructure requirements should be generated from assessments structured around the key questions of what, when, where, how and how much infrastructure is needed to offset any deficits.
Details of Reasons for Soundess/ Legal Complaince:

Eastbourne Borough Council welcomes the importance that Wealden’s Proposed Submission Core Strategy has placed on the “Effective Provision of Infrastructure”. This is one of the essential components of the Core Strategy and the issue upon which its overall deliverability will ultimately be determined. The Council welcomes the inclusion of the wording which states that “The release of land for development will be conditional upon there being sufficient capacity in the existing local infrastructure to meet the requirements generated by the proposed development” and believes this is a fundamental premise upon which to base development proposals. The accompanying Infrastructure Delivery Plan provides a comprehensive list of transport interventions required in South Wealden, but there is little explanation of the cumulative impact that travel to work, access to services and facilities has on the movement between Eastbourne and locations in South Wealden. Furthermore, there is no explanation in the supporting text about whether or how developer contributions would be sought and allocated, and this is something that should be clarified to ensure that Policy WCS7 is as effective as possible. There is a high degree of uncertainty regarding the Hailsham South Waste Water Treatment Works and whether or not an extension to the plant will be delivered within the course of the plan period to cater for the additional growth proposed. This additional growth has the potential to place pressure on Eastbourne’s existing Waste Water Treatment Works, which may be required to cater for growth in the southern part of Wealden outside Eastbourne’s boundary. This has the potential to affect the deliverability and developability of new residential development within Eastbourne and something that needs further consideration. There is a lack of information to explain how the pupil number projections are calculated and what the forecast level of growth in children of school age will be over the course of the plan period. The possible expansion of primary and secondary education in the Polegate/Willingdon and Stone Cross areas could also cater for growth in children of school age in peripheral areas of Eastbourne such as Ratton, Hampden Park and Langney. This should be referred to in the Infrastructure Delivery Plan as school catchment areas are not confined to local authority boundaries. The way the key infrastructure issues for each location within Wealden have been listed systematically is very useful and is particularly valuable for the Borough Council in understanding the cross-boundary implications that development in Wealden will have for Eastbourne. It is expected that greater clarity will be provided on the infrastructure issues as the Core Strategy nears adoption but all issues should ideally be resolved before the Examination in Public. The Borough Council is keen to work closely with Wealden District Council to ensure a satisfactory outcome.

Details of Changes to be Made:

Details of Reasons for Soundess/ Legal Complaince:

I remain to be convinced that the message has got through that we must have the necessary infrastructure before development is allowed.

Details of Changes to be Made:
Summary of all Representations - Proposed Submission Core Strategy Regulation 27 - Report 11th July 2011

Representation ID
691
Person ID  Mr  Beams  Agent ID
519685  Willingdon and Jevington Parish Council

WSC7 Effective Provision of Infrastructure

Sound  No  Justified  Effective  Consistent with national policy
Legally Compliant  No

Details of Reasons for Soundess/ Legal Complaince:
WSC7 - WJPC seeks assurances that this condition will be enforced prior to the commencement of any development identified in SD4

Details of Changes to be Made:

Representation ID
497
Person ID  Ms  Goulden  Agent ID  Mr  Ide
522120  Batcheller Monkhouse  335759  Batcheller Monkhouse

WSC7 Effective Provision of Infrastructure

Sound  No  Justified  Effective  Consistent with national policy
Legally Compliant  Yes  No

Details of Reasons for Soundess/ Legal Complaince:
WSC7 states adequate infrastructure is a precondition of any development. Developers need to understand what the implications of this are going to be, eg what happens when a piece of infrastructure is so significant that it cannot be afforded until contributions are received from later, phased development? Also, who has responsibility for providing and implementing the infrastructure? The infrastructure delivery plan, which is offered up as evidence in support of the Core Strategy, needs to be examined alongside WCS7, eg at a separate session of the forthcoming Examination. As presented in the Plan, WCS7 could deter development and jeopardise the Core Strategy; also what safeguard is there that infrastructure suppliers will not come to rely disproportionately upon developers.

Details of Changes to be Made:
The Infrastructure Delivery Plan is examined at a separate session of the forthcoming Examination to prove that WCS7 is deliverable.
### Representation ID: 589

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WCS7 Effective Provision of Infrastructure

**Sound**: Yes, No, Justified, Effective, Consistent with national policy

**Legally Compliant**: Yes, No

**Details of Reasons for Soundness/ Legal Compliance:**

Infrastructure Needs Para 7.2 states "the fundamental principle is that development that generates a need for infrastructure or enhancements to existing infrastructure will only be permitted if the necessary infrastructure to support it is either already in place, or there is a reliable mechanism to ensure that it will be provided at the right time, when it is needed." Given the history of difficulties in Wealden in providing the necessary infrastructure to support development there is little confidence that development will not be allowed in the future without the infrastructure being in place. There have to be questions whether the policies relating to infrastructure are sound.

**Details of Changes to be Made:**

Policy WCS7 Delete the words 'will be conditional upon there being' and substitute 'take into consideration' delete the words 'must' and substitute 'should'

### Representation ID: 1118

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<tr>
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WCS7 Effective Provision of Infrastructure

**Sound**: Yes, No, Justified, Effective, Consistent with national policy

**Legally Compliant**: Yes, No

**Details of Reasons for Soundness/ Legal Compliance:**

The need to provide related infrastructure with housing development is acknowledged. However the need for infrastructure is not a precise measurement. Some level of overloading may well be acceptable until new or improved facilities are provided. The policy as currently drafted could be an absolute embargo on needed development.

**Details of Changes to be Made:**

Policy WCS7 Delete the words 'will be conditional upon there being' and substitute 'take into consideration' delete the words 'must' and substitute 'should'
Details of Reasons for Soundness/ Legal Complaince:

Those residents who disagree would simply list the following justifiable reasons for doing so because they live in and know their area. Most importantly they do not believe the necessary infrastructure will be put in place in time to deal with: 1. Traffic congestion on the A22 2. Health requirements - Doctors and hospital at full capacity 3. Education: local schools full capacity - sufficient places 4. Water drainage, sewage treatment 5. Recreational requirements; sports facilities

Details of Changes to be Made:

Sound: Yes, No, Justified, Effective, Consistent with national policy
Legally Compliant: Yes, No

Details of Reasons for Soundness/ Legal Complaince:

3. We agree with the underlying objectives for the housing trajectory to ensure that there is a continuous supply of new housing over the plan period that takes account of market conditions, the ability for communities to assimilate new development and the provision of the necessary infrastructure. However whilst Policy WCS5 does include flexibility in itself, and this is implicit in the housing trajectory (figure 4) which is referred to in Policy WCS5, the status of figure 5 is unclear and the wording in paragraph 5.16 reduces the flexibility. For example, it is suggested that development at south Polegate and east Willingdon (SD4) will be phased to commence from 2019 to enable integration of development in relation to transport infrastructure requirements and interventions in south Wealden. Transport analysis undertaken on behalf of our client suggests there may well be scope for some development before this date. We do not consider there is any advantage in artificially delaying the commencement of development if there is no good reason to do so. This approach would be consistent with paragraph 7.4 where it is stated that development should make the most effective use of existing infrastructure. It is possible to phase housing development to take advantage of existing infrastructure and ensure a satisfactory supply of housing is achieved and development should not be hindered by more strategic infrastructure concerns. One of the advantages of the area identified for growth in Polegate is that it will integrate more naturally into the existing built form, rather than satellite locations with intervening movement constraints such as main roads etc, will help to minimise the use of cars and therefore will create less need for highway infrastructure improvements. 4. The infrastructure constraints of the various Strategic Development Areas in the Core Strategy will become clearer through the Strategic Site Allocations DPD and we consider that more detailed phasing guidance should await this document and not be included in the Core Strategy. In addition the introduction of the Community Infrastructure Levy by 2014 may give better opportunities to fund transport (and other) infrastructure than has been the case in the past. In addition, Policy WCS7 (Effective Provision of Infrastructure) ensures that the release of land for development is conditional upon there being sufficient capacity in the existing local infrastructure to meet the requirements generated by the proposed development.

Details of Changes to be Made:
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<td>Mrs Pidgeon</td>
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<td>Adams Hendry</td>
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<tr>
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<td>Policy 7</td>
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**Sound**  
☑️ No  
☐ Justified  
☑️ Effective  
☐ Consistent with national policy

**Legally Compliant**  
☑️ Yes  
☐ No

**Details of Reasons for Soundess/ Legal Complaince:**

It is considered that Policy WCS7 is unsound on the grounds that the Core Strategy is not effective in providing the necessary planning policy support for the delivery of water infrastructure. Such infrastructure may be necessary to deliver development promoted by the Core Strategy. South East Water broadly welcomes the assertion in the policy that the “release of land for development will be conditional upon there being sufficient capacity in the existing local infrastructure to meet the requirements generated by the proposed development”. Whilst the policy recognises the need to work with infrastructure providers and identifying requirements within the Infrastructure Delivery Plan, the Core Strategy fails to provide policy support for water companies or other service providers in bringing forward new infrastructure. The policy should clearly state that new infrastructure necessary to meet existing and future demands will be supported.

**Details of Changes to be Made:**

In order for the Core Strategy to be effective, the following should be incorporated into policy WCS7: "New infrastructure necessary to meet the needs of existing or future development will be supported."

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Page 1434 of 1511
Summary of all Representations - Proposed Submission Core Strategy Regulation 27 - Report 11th July 2011

Representation ID
309

Person ID  Mr  Hatfield
104480  Agent ID  Mr  Hatfield
102470  Agent ID  J J Hatfield & Co Ltd

WCS7 Effective Provision of Infrastructure

Sound  ☑ Yes  ☑ No  ☑ Justified  ☑ Effective  ☑ Consistent with national policy
Legally Compliant  ☑ Yes  ☐ No

Details of Reasons for Soundness/ Legal Complaince:

I have examined the Proposed Submission Core Strategy (PSCS) against the Soundness Tool and found it wanting in terms of justification and effectiveness. The PSCS is a carefully prepared document, well thought out to offer a plan for the future but it does not take full account of the background research and documentation upon which it is based. In particular the proposals to expand Hailsham to the north do not comply with the sustainability or infrastructure objectives for Wealden and the proposals for development to the east and north of Hailsham are contrary to previous WDC research and to current Background Papers. Participation The consultation process has permitted all interested parties to engage but the options for answering have been strictly limited on a Yes or No basis when, in fact, more discursive answers are needed. Research/Fact Finding The content of the PSCS is not justified by the evidence, particularly in respect of infrastructure and especially highways and sewerage. Document No 7 Infrastructure Position Statement dated July 2009 refers under (A) Transport to the need to reduce travel distances. The PSCS shows strategic development to North and East Hailsham and towards Hellingly at distances from the town centre of up to 2.2 km. The South Wealden & Eastbourne Transport Study (SWETS) in paragraph 3.29 makes it clear that development for major housing allocations in north and east Hailsham would cause significant traffic pressure. Fewer pinch points and reduced traffic pressure are shown for development south of Hailsham. BP No 11 Infrastructure Delivery Plan defines the highways issue for development to the north and east as ‘CRITICAL’ and states ‘Development is contingent on delivery of this infrastructure’. Regarding sewerage/waste water capacity, as outlined in BP No 11, Hailsham North wastewater works had a consented discharge capacity at 1st Jan 2007 at 2900 dwellings. Hailsham South wastewater works had a capacity of 2400 dwellings at same date. This same document shows infrastructure developments in the Appendix for the North water treatment works is deemed CRITICAL to deliver 1500 dwellings. In the south of Hailsham ‘A scheme is not necessary to deliver the proposed Submission Core Strategy. However a scheme may be required for windfalls of housing and employment development.’ The same Background Paper states under ‘Further Supporting Evidence’: ‘Infrastructure is not necessary to achieve the full allocation of development in Hailsham, Polegate and Stone Cross as shown in the proposed Submission Core Strategy.’ This reliance on ‘massing’ in the north of Hailsham therefore has infrastructure issues which could be avoided by reducing the size of the Strategic Development Areas and spreading the housing to the south of the town. According to the Housing Needs Assessment the greatest number of low income families are located to the south and such development would help to balance with Affordable and mixed housing. The Table at the end of BP 11 sets out water treatment for extant Planning Permissions and completions from April 2006-April 2010 and states that there are capacity issues arising in the north from the Spatial Strategy but not in the south. The Conclusions to BP 11 state that wastewater funding has been secured from Ofwatt for works in 2012 to increase capacity in the Hailsham area and to undertake a study to investigate other technical solutions. The financial solution would be via appropriate developer contributions. In summary, therefore, according to BP11 there are no capacity issues in South Hailsham providing development is not beyond 2400 houses, less 885 already approved – namely 1515 dwellings in Polegate, Stonecross and South Hailsham. The Oaklands/Brickfield SHLAA site 100/1310 (224 dwellings) includes an East Sussex County Council approved road scheme to allow capacity for up to 300 dwellings. Landscape In January 2001 WDC prepared the ‘Low Weald Towns Sector Appraisal Landscape’ as part of the Background Papers for the then Local Plan Review. This document is partly incorporated in Background Paper No 6 Green Infrastructure. BP 6 does not include the following relevant paragraph about the landscape around Hailsham: ‘South of Hailsham: …Urban Influence: On the western side of the sector the urban edge of Hailsham is generally well concealed by woodland often in deep ghylls or valleys. Scattered farms and houses are linked by a network of roads and lanes, the latter often sunk between high overgrown hedges. Horse grazing is common, a reflection of urban pressures, and as a result many of the pastures have the unkempt rather untidy appearance of paddocks. Rough sherd, water troughs and other paraphernalia are common place. …’ Under the heading ‘Sensitivity to Development’ the Landscape Appraisal states: ‘The relatively open aspect of the landscape east of the Cuckmere flood plain makes it sensitive to change by new development and any large scale expansion of the built form beyond the existing urban edge of Hailsham in this location would tend to damage the rural setting of the town. ..’ ‘However there is very little scope for additional development on the western edge of the sector without threatening the intrinsic qualities of the landscape and more particularly the rural settings of Hellingly and Horselunges Manor. Importantly the urban influence of Hailsham is hardly noticeable in this reach of the Cuckmere valley apart from some ribbon
development along the A271 on the immediate fringes of the town. Any significant expansion of the built form in this location (Hellingly/North Hailsham) would be likely to erode the historic landscape, structure and rural character of this valuable landscape and irreparably damage the vulnerable gap of countryside between Hailsham and Hellingly.' The Sustainability Appraisal sets out on p 42 the Sustainability Objectives for Wealden. The environmental objectives include: 7. ‘To make the most efficient use of land by prioritising brownfield sites for development, the re-use of existing buildings and promoting higher development densities.’ 11. ‘To conserve, enhance and make accessible for enjoyment the District’s countryside (in particular protecting the best and most versatile agricultural land) landscape, historic and built environment.’ 12. ‘Reduce the need to travel by car and promote alternative methods of transport.’ Development north and east of Hailsham is contrary to all or most of these objectives because it would increase travel distance, increase reliance on motor cars and damage the landscape and countryside, being on greenfield sites. SHLAA site 100/1310 Oaklands & The Brickfield are on a previously developed site, the Brickfield being defined as ‘Brownfield’. Oaklands, being used for business ‘horsey culture’ and not agriculture is also classified as ‘brownfield/previously developed’ under PPS3. Development of these sites south of Hailsham therefore complies with the environmental objectives set out in the Sustainability Appraisal. Alternatives The Council’s chosen approach in the PSCS is therefore not the most appropriate given the reasonable alternatives and it goes against the Background Papers and existing evidence base. It would appear from the PSCS that sustainability considerations have not informed its content from the start. In particular, it is stated at Para 6.30 of the PSCS that the Polegate, Willingdon, Stonecross development of 700 dwellings can only take place when formal road infrastructure is in position. Therefore SD4 is not programmed to start until 2019/20. Similarly, Para 5.16 states that the proposed northern urban extension of Hailsham (SD2 & SD3) cannot occur without infrastructure improvements namely sewerage and roads. Hence SD2 cannot start until 2017 and SD3 until 2021. I would submit that this issue of roads indicates that, by definition, the Strategic Development Areas forming the northern extension of Hailsham towards Hellingly and those in Polegate, Willingdon and Stone cross are unsustainable. The PSCS was initially prepared in its Draft and Consultation forms on the basis of the requirements of the South East Plan. This is now being abandoned and will no longer be valid. Because the Draft Core Strategies and most of the evidence gathering and Background Papers were prepared in accordance with the South East Regional Plan, the current PSCS is probably invalid and I would submit that the Inspector should examine this. Delivery The Council has correctly identified the main issues that the PSCS is seeking to address but does not present a clear vision for Wealden District into the future, only the equivalent of a ‘wish list’ of construction of 400 houses a year and sufficient commercial development for employment. It does not clarify how to achieve this, particularly in respect of infrastructure. The major strategic development north and east of Hailsham introduce an unacceptable risk in the ability to provide the infrastructure. Cross boundary issues have not been adequately addressed. In particular with Mid Sussex District Council and associated County Council Highways liaison for a relief road around East Grinstead. Nor does it address the problems of coalescence between Polegate, Willingdon and Stonecross and Eastbourne Councils, nor does it address the cross boundary issues which will arise with Lewes District Council, particularly in connection with development around Uckfield. The PSCS sets out objectives in terms of construction and development but does not connect these in sufficient detail with the necessary infrastructure. The most obvious gap in the policies is related to transport, in that the entire PSCS is predicated on continued and developing use of motor vehicles, there being no positive action proposed in relation to the Uckfield-Lewes Railway line and only passing mention of the possibility of public transport or reinstated railway from Hailsham southwards to Polegate and Eastbourne. The timescales given in the Plan are governed by the moribund South East Plan and are not realistic, particularly in respect of infrastructure provision and especially given the proposals in the PSCS for development north of Hailsham which will rely on the motor car. This is contrary to Spatial Planning Objective 7. Currently the Strategic Development Areas SD2, SD3, SD4, SD6 & SD7 are all undeliverable as set out in Paras 3.16, 6.19 & 6.31 due to lack of existing highways infrastructure. This amounts to 2650 dwellings which cannot be delivered. Flexibility It is not clear whether the PSCS will be flexible enough to respond to a variety of, or unexpected changes in, circumstances, whether environmental, political or economic. Currently there is no clear plan for updating it. It cannot be very flexible because of the infrastructure constraints in Wealden District. Summary The PSCS does not explain how its key policy objectives will be achieved because it is based on the South East Plan which is being abolished. Most of the supporting documents are also based around the South East Plan and pre-date its abolition. The proposals for Strategic Development housing north and east of Hailsham and in Polegate, Willingdon & Stonecross are all undeliverable because of lack of highways infrastructure and, in the north, due to lack of sewerage capacity. These proposals therefore contradict Wealden’s own sustainability and environmental objectives. The PSCS does not take proper account of some sites in the SHLAA which are recognised as suitable and which meet sustainability objectives better than those selected for ‘Strategic Development’. The Oaklands and Brickfield site south of Hailsham (SHLAA 100/1300: 224 dwellings) is largely on previously-developed (brownfield) land and has a highways scheme for the Ersham Road roundabout agreed with East Sussex County Council and should be included in the SDAs to the exclusion of less suitable development. It meets the Hailsham Sustainability Objectives, being a local Urban Extension within walking distance of Hailsham town centre and offering proximity to open space, woodland and biodiversity – at a scale capable of delivering up to 224 dwellings with minimum impact on infrastructure and environmental amenity. This PSCS has given careful consideration to the issues within the Wealden area but falls short of achieving deliverability because of a decision to favour massing over locality, with all the consequent risks involved in reliance on a minimum number of SDAs and with an intention to
release more greenfield sites than is compliant with government recommendations. I welcome the Review and monitoring procedures inherent in the PSCS but this document is currently unsound.

**Details of Changes to be Made:**
Infrastructure is defined by Wealden District Council as CRITICAL for development north and east of Hailsham and at Polegate, Willingdon and Stonecross. Such development is therefore uncertain due to its scale and Wealden should look to other developments which have already agreed infrastructure provision, such as SHLAA site 100/1310, Oaklands & The Brickfield.

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<td><strong>Sound</strong></td>
<td>☐ Yes ☑ No ☐ Justified ☑ Effective ☐ Consistent with national policy</td>
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**Details of Reasons for Soundess/ Legal Complaiance:**
WCS7 states adequate infrastructure is a precondition of any development. Developers need to understand what the implications of this are going to be, eg what happens when a piece of infrastructure is so significant that it cannot be afforded until contributions are received from later, phased development? Also, who has responsibility for providing and implementing the infrastructure? The infrastructure delivery plan, which is offered up as evidence in support of the Core Strategy, needs to be examined alongside WCS7, such as at a separate session of the forthcoming Examination. As presented in the Plan, WCS7 could deter development and jeopardise the Core Strategy; also what safeguard is there that infrastructure suppliers will not come to rely disproportionately upon developers. Proposed Change

**Details of Changes to be Made:**
The Infrastructure Delivery Plan is examined at a separate session of the forthcoming Examination to prove that WCS7 is deliverable.

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**Details of Reasons for Soundess/ Legal Complaiance:**
WCS7 states adequate infrastructure is a precondition of any development. Developers need to understand what the implications of this are going to be, eg what happens when a piece of infrastructure is so significant that it cannot be afforded until contributions are received from later, phased development? Also, who has responsibility for providing and implementing the infrastructure? The infrastructure delivery plan, which is offered up as evidence in support of the Core Strategy, needs to be examined alongside WCS7, such as at a separate session of the forthcoming Examination. As presented in the Plan, WCS7 could deter development and jeopardise the Core Strategy; also what safeguard is there that infrastructure suppliers will not come to rely disproportionately upon developers.

**Details of Changes to be Made:**
The Infrastructure Delivery Plan is examined at a separate session of the forthcoming Examination to prove that WCS7 is deliverable.
Details of Reasons for Soundess/ Legal Complaince:
It is inappropriate to make the release of land for development conditional on there being sufficient capacity within the existing local infrastructure instead the policy should be more appropriately reworded to make provision for the timely improvement of infrastructure concurrent with development.

Details of Changes to be Made:
That the first sentence of WCS7 be deleted.

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Details of Reasons for Soundess/ Legal Complaince:
WCS7 states adequate infrastructure is a precondition of any development. Developers need to understand what the implications of this are going to be, eg what happens when a piece of infrastructure is so significant that it cannot be afforded until contributions are received from later, phased development? Also, who has responsibility for providing and implementing the infrastructure? The infrastructure delivery plan, which is offered up as evidence in support of the Core Strategy, needs to be examined alongside WCS7, eg at a separate session of the forthcoming Examination. As presented in the Plan, WCS7 could deter development and jeopardise the Core Strategy; also what safeguard is there that infrastructure suppliers will not come to rely disproportionately upon developers. Proposed Change

Details of Changes to be Made:
The Infrastructure Delivery Plan is examined at a separate session of the forthcoming Examination to prove that WCS7 is deliverable.
Details of Reasons for Soundness/ Legal Complaince:

The Core Strategy acknowledges that there remains a great deal of work to be done in achieving a satisfactory understanding of the infrastructure consequences of the development associated with the release of the broad locations identified. It is also apparent that the completion of various studies and assessment of the findings could significantly influence the way in which sites can deliver new homes and/or by when. Furthermore a number of sites appear to have been ruled-out before the completion of studies which could have led to their identification and inclusion within the identified broad locations. The approach also suggests that a Community Infrastructure Levy (or CIL) should be investigated which would significantly improve certainty and greater predictability in terms of funding issues and related delivery.

Details of Changes to be Made:

There remains a great deal of work to be done in understanding the infrastructure consequences of the various locations identified for growth together with a re evaluation of those sites superficially rejected without the outcome of on-going or completion of only partial studies. A CIL policy should be considered.

Details of Reasons for Soundness/ Legal Complaince:

WCS7 states adequate infrastructure is a precondition of any development. Developers need to understand what the implications of this are going to be, eg what happens when a piece of infrastructure is so significant that it cannot be afforded until contributions are received from later, phased development? Also, who has responsibility for providing and implementing the infrastructure? The infrastructure delivery plan, which is offered up as evidence in support of the Core Strategy, needs to be examined alongside WCS7, eg at a separate session of the forthcoming Examination. As presented in the Plan, WCS7 could deter development and jeopardise the Core Strategy; also what safeguard is there that infrastructure suppliers will not come to rely disproportionately upon developers. Proposed Change

Details of Changes to be Made:

The Infrastructure Delivery Plan is examined at a separate session of the forthcoming Examination to prove that WCS7 is deliverable.
Representations ID 1578
Person ID 522137
Agent ID Policy 7
WCS7 Effective Provision of Infrastructure

Sound ☑ Yes ☐ No ☐ Justified ☑ Effective ☐ Consistent with national policy
Legally Compliant ☐ Yes ☐ No

Details of Reasons for Soundness/ Legal Complaince:
WCS7 states 'the release of land for development will be conditional upon there being sufficient capacity in the existing local infrastructure to meet the requirements generated by the proposed development.'

Details of Changes to be Made:
PTC seeks assurances that this condition will be enforced prior to the commencement of any development.

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Representations ID 1674
Person ID 107737
Agent ID 522234
WCS7 Effective Provision of Infrastructure

Sound ☑ Yes ☐ No ☐ Justified ☑ Effective ☐ Consistent with national policy
Legally Compliant ☜ Yes ☐ No

Details of Reasons for Soundness/ Legal Complaince:
3.2 Suitable Alternative Natural Green Space 3.2.1 This section of our representations refers to policy WCS7 and supporting paragraph 3.32. It is summarised below: Section of Core Strategy: Policy WCS7 Effective Provision of Infrastructure and para 3.32 Legally Compliant: -Sound: No -Justified: No -Effective: No -Consistent with national policy: -

3.2.2 We contend that the Council has not demonstrated that there is a reasonable prospect of delivery of Suitable Alternative Natural Green Space (SANGS) on time to mitigate impacts from development on the Ashdown Forest Special Protection Area (SPA) which means that the quantum of housing identified in the Core Strategy can not be delivered. 3.2.3 Para 3.32 of the submission Core Strategy states that for developments within seven km of the Ashdown Forest, there will be a requirement for SANGS to be provided. This has a particular impact on the deliverability of homes in Uckfield and Crowborough. 3.2.4 The housing trajectory set out in Figure 5 of the submission Core Strategy shows homes being delivered in Uckfield from 2016/17 onwards, and in Crowborough from 2015/16 onwards. 3.2.5 In respect of Crowborough, this is just five years away (from the time of submitting these responses). Para 6.34 of the submission Core Strategy notes that for land to come forward for development in Crowborough SANGS will be required. However, no land for SANGS has been identified. 3.2.6 According to the Wealden Local Development Scheme (LDS) 2009-2013 (March 2010), the Councils Strategic Sites DPD is not due to be adopted until the end of 2012, with a Delivery and Site Allocations DPD following for adoption at the end of 2013. The LDS notes that public consultation on the Site Allocations document will be undertaken in January / February 2011. This did not take place. There is no publically available timeframe to establish when this consultation will now take place. The programme for delivery has slipped and it is unclear when these documents will be adopted. The end of 2014 may be a more realistic date now for the Delivery and Site Allocations DPD. 3.2.7 We would expect one of the DPDs to identify development sites and land for SANGS. The timing here is critical: if land for SANGS is not identified until 2014 this does not allow sufficient time for this to be incorporated within planning applications and proposals for new homes in Crowborough, and for these to be determined in enough time to allow for the first units to be delivered in the phasing period 2015/16. 3.2.8 The Core Strategy Infrastructure Delivery Plan (Background Paper 11) explicitly identifies the issue of SANGS as critical to supporting growth. It states (see Table 1): 'Development within and around Crowborough is constrained by proximity to the Ashdown Forest and Special Protection Area / Special Area of Conservation'. 'A number of avoidance and mitigation measures required, including visitor management and the provision of a local SANG in Crowborough'.

Details of Changes to be Made:
SUMMARY 3.2.9 We thus contend that the housing trajectory is unsound because it is not effective as the Council has not demonstrated that quantum of growth identified in Crowborough can be delivered.
Details of Reasons for Soundness/ Legal Compliance:
Herstmonceux C of E Primary School would not be able to accommodate any significant increase in pupil numbers; the present Year 1 class already has 39 children and who started in the school in September 2009, exceeding the ESCC guidelines of 30 pupils. The problems associated with these high numbers both in teaching and of physical space will continue through the subsequent school life of these children. This point was also raised in the Parish Council's response to the Spatial Options Consultation in August 2009, which noted that the ESCC Report on Primary Schools 1 May 2009 stated that the current site of the school is too small for the pupil numbers and it has insufficient outside space for the children. There are no current plans to build or expand the school to proved extra school spaces for new families.

Details of Changes to be Made:

Conclusion Whilst the strategy plan will appear to have a lot of effort put into it, as it stands it would be a disaster if implemented and I would like to see the secretary of state to call in a public inquiry.

Details of Reasons for Soundess/ Legal Compliance:
Schools / Education I understand that there are 700 children in Eastbourne that are unable to attend a school in Eastbourne with lack of places, with more development proposed in Wealden the case for more educational centres are needed. I understand some developers are not willing to pay the contribution to schools infrastructure; they should be told if you don't pay, go away!

Details of Changes to be Made:
Conclusion Whilst the strategy plan will appear to have a lot of effort put into it, as it stands it would be a disaster if implemented and I would like to see the secretary of state to call in a public inquiry.
SP03 Herstmonceux Parish Council supports the statements relating to the delivery of infrastructure particularly in respect of development in Herstmonceux and Hailsham. However, although the document notes the intent, Wealden District Council is not capable of the delivery of the schemes as these are the functions of other bodies. If there are procedures in place for Wealden District Council to materially influence the delivery of infrastructure, explicit details of how it will be achieved should be listed.

Details of Changes to be Made:

7.11 Housing Needs Survey has confirmed an annual need for 812 dwellings. However this is not deliverable in context of the proposed housing provision. So what? If housing need is not met in full this will lead directly to a shortage which in turn will drive up prices and make housing in Wealden even less affordable. The housing waiting list is bound to increase at this time and to make no provision for this increase or indeed to deliberately not meet WDC’s own confirmed need is irresponsible and makes the survey a waste of public money. Because of recent and current conditions the Housing Waiting List is probably inflated by middle income groups who might be able to afford a mortgage, on a shared ownership basis, and this type of housing should be encouraged to give a step into home ownership and so that those in real need, because of restricted incomes, can be given priority for rentable social housing.

Details of Changes to be Made:

With regards to affordable housing, Policy WCS8 does not allow for exceptional circumstances where 35% affordable housing is not achievable due to economic viability (although it is mentioned in paragraph 7.14). It is considered that this should be included in the wording of the policy in order to ensure that a five year supply of housing can be maintained and enable developers to bring forward viable housing development.

Details of Changes to be Made:
Details of Reasons for Soundess/ Legal Complaince:
A robust policy on affordable housing is an integral part of any Core Strategy and the inclusion of Policy WCS8 is therefore welcomed. Paragraph 6.3 of Background Paper 2: Managing the Delivery of Housing, acknowledges that Wealden "has a high proportion of owner occupied properties (83%) and a lower proportion of social rented (8%) and private rented properties (9%) than East Sussex as a whole or the South East". Furthermore, paragraph 6.4 notes that "Wealden has the highest [house price to median income] ratio of all the East Sussex authorities and is therefore one of the most difficult and expensive places in which to access the housing market". In this context, and given the evidence contained in other supporting documents including the Strategic Housing Market Assessment (SHMA) and Housing Needs Assessment (HNA), it is clear that there are important housing issues in Wealden that need to be addressed in its Core Strategy. Issues relating to affordability are particularly acute and whilst a balance needs to be found, which ensures that schemes remain viable, it is clear that the supply of affordable housing needs to be significantly enhanced to help address historical shortfalls. Policy WCS8 requires affordable housing to be provided on sites of 5 or more dwellings (net) or on sites of 0.2 hectares or more. Affordable housing will be required at a level of 35% of the number of dwellings in any scheme. This is different to the proposed affordable housing requirement threshold in The Eastbourne Plan (Eastbourne’s Proposed Core Strategy). Policy D5 of The Eastbourne Plan states that “All development will be required to contribute towards affordable housing where there is a resultant net gain of 1 or more residential units”. There is some concern that Wealden’s threshold might pose problems for the deliverability of small housing schemes (between 1 and 4 residential units) in Eastbourne. This threshold has the potential to lead to developers looking at small sites in Wealden where there is no requirement for contributions towards affordable housing, rather than in Eastbourne. Eastbourne has very few large scale strategic residential sites and is consequently likely to rely strongly on smaller sites to meet its overall housing requirement over the course of the plan period. This is a very different situation to Wealden District, which has a number of large allocated development sites, on which a certain quota of affordable housing will be sought on each site. More detail will be provided on this in their emerging Allocations Development Planning Document (DPD). Policy WCS9 also allows for affordable housing to be developed on ‘rural exception’ sites, encouraging the provision of affordable housing in settlements where new housing development will not normally be permitted. A coordinated approach needs to be taken to balance the need for affordable housing, whilst at the same time ensuring developments remain economically viable across both local authorities. There is further opportunity to address this through close working on the development of Wealden’s Allocations DPD.

Details of Changes to be Made:

Details of Reasons for Soundess/ Legal Complaince:
Whilst it is acknowledged that there is a need for affordable housing, it is considered the policy has the potential to constrain development. It is not considered the appropriate time for such a drastic and fundamental change to the affordable housing threshold. Further detailed amplification is found in the covering letter to this rep, and a revisit of the policy is required, suggesting a less dramatic change to the affordable housing ‘trigger’. 
Details of Reasons for Soundness/ Legal Compliance:
The Plan notes the need for flexibility in providing affordable housing following the Strategic Housing Marketing Assessment. It is suggested that Paragraph 2 of the Policy is reworded to indicate the provision may be higher or lower, as indicated in the reasoned justification.

Details of Changes to be Made:
Reword Paragraph 2 of WCS8 along the lines that subsequent Development Plan Documents may specify a different Affordable Housing Target with regard to the Housing Viability Assessment and the Strategic Housing Marketing Assessment.

Details of Reasons for Soundness/ Legal Compliance:
The provision of 35% of all residential schemes is a significant impact on the economies of a residential site. The need is for family housing but if 35% is all in the form of housing this takes a disproportionate amount of development land. The policy should reflect this so that a range of 30 - 35% should be included depending on the number of affordable houses compared with affordable flats.

Details of Changes to be Made:
Change "Affordable housing will be required at a level of 35% of the number of dwellings in any scheme" to "Affordable housing will be required at a level of 30 - 35% of the number of dwellings in any scheme. The percentage being dependent on the number of affordable houses proposed compared with affordable flats."
Summary of all Representations - Proposed Submission Core Strategy Regulation 27 - Report 11th July 2011

Representation ID
826

Person ID  Mr & Flittner
Agent ID
106034

WCS8 Affordable Housing
Policy 8

Sound  □ Yes  ☑ No  ☑ Justified  ☑ Effective  ☑ Consistent with national policy
Legally Compliant  □ Yes  □ No

Details of Reasons for Soundless/ Legal Complaince:
Consider the level set for the start of the requirement for affordable housing is too low and will deter sites coming forward. Most small sites are likely to be windfall sites where there is an existing economic use or value. Or there can be additional development costs due to contamination or demolition and site preparation costs. Equally the government and councils increasingly look on housing as a milch cow to fund everything under the sun, with developments now effectively having to pay a roof tax to fund all these requirements. This may get even worse if the CIL is imposed on every new house as some councils are now doing, and the government has indicated it may bring in. Thus this policy as set out is likely to be self defeating as it will not make it worth while for small windfall sites to come forward in the way they have in the past thus causing less already development land to be available, so forcing more greenfield land to have to be used. As an illustration, the objectors own a possible/potential windfall site and at the start level submitted for affordable housing by WEC we would not make any attempt to put it forward as it would not viable to develop with all the other costs involved in just getting permission, CIL, S106 costs etc.

Details of Changes to be Made:
The policy should be amended to 21- houses or more, and o.5a or more

Legally Compliant  ☑ Yes  □ No

Representation ID
1200

Person ID  Mr Skellorn
Agent ID  Mr Barker

WCS8 Affordable Housing
Policy 8

Sound  □ Yes  ☑ No  ☑ Justified  ☑ Effective  ☑ Consistent with national policy
Legally Compliant  ☑ Yes  □ No

Details of Reasons for Soundess/ Legal Complaince:
1.1 We object ot Policy WCS8 national policy states that planning obligations must be fairly and resonably related to the poposed development. Community infrastructer Levy Regulation 122 states tha a planning obligation will only constitute a reason to grant planning permission if it is necessary to make the development acceptable in planning terms, it is directly related to the development and fairly and reasonably related in scale and kind to the development. This legal test (which reflects the existing policy position) has general application for determinations made on or after 6 April 2010. 1.2 We support the comments in paragraph 7.10 to 7.14 that the requirement to prove affordable housing will be varied if the developer can provide evidence of economic viability. We also note the assessment that the northern and central parts of the District can provide more affordable housing than the southern part of the district.

Details of Changes to be Made:
The policy does not reflect the supporting text that precedes it. To reflect the supporting text and national policy the policy should be amended so that the second sentence of the second paragraph reads "Wher sites are allocated in a site allocations Development Plan Document, that document may specify a different housing target, having regards to the findings of Wealden House Viability Assisment, any site specific considerations and national policy which requires that planning obligations must be fairly and reasonably related to the proposed development.

Legally Compliant  ☑ Yes  □ No
WCS8 Affordable Housing Policy 8

Sound  ☑ Yes  ☐ No  ☑ Justified  ☐ Effective  ☐ Consistent with national policy
Legally Compliant  ☑ Yes  ☐ No

Details of Reasons for Soundess/ Legal Complaince:
Whilst the policy is supported the infrastructure constraints of the major urban extensions to the north and east of Hailsham will prevent early delivery of housing within the settlement with these areas dependent on significant highway infrastructure improvements before housing can be delivered.

Details of Changes to be Made:
The provision of an additional urban extension to the south of Hailsham (SD13) will assist in delivering affordable housing, consistent with the policy in the short to medium term as opposed to the alternative sites which will not deliver until later in the plan period.
Summary of all Representations - Proposed Submission Core Strategy Regulation 27 - Report 11th July 2011

Representative ID
1426

Person ID Mr. Harper
104179

Agent ID Mr. Wilford
339545

WCS8 Affordable Housing Policy 8

Sound ☑ Yes ☐ No ☐ Justified ☑ Effective ☐ Consistent with national policy

Legally Compliant ☑ Yes ☐ No

Details of Reasons for Soundness/ Legal Compliance:

iii) Core Policies a) WCS8: Affordable Housing – COMMENT/OBJECT 2.55 There is a recognised ‘need’ for affordable homes in the District. The overall delivery of housing in Wealden is recognised as resulting in a significant backlog of Affordable Homes which requires a delivery rate of 812 affordable dwellings per annum (para. 7.11 of CS) to rectify this deficiency over the plan period. As a result of this, a viability assessment has been prepared to support a specific affordable housing target and threshold. Within Policy WCS8, this is set at 35% on housing sites of 5 No. or more or 0.2ha and above. However, WCS8 also states that where sites are allocated in a Site Allocation DPD, this provision could be higher. 2.56 Notwithstanding the significant backlog, we consider that it is not for new strategic sites to rectify the existing affordable housing deficiencies in the District and attempt to deliver what has not been provided for in the past and perhaps its over-reliance upon smaller windfall sites that do not deliver such provision. Whilst we recognise the viability assessment considers that housing sites in the North and South of the District can accommodate a different level of affordable housing (para. 9.13 of BP2: Managing the Delivery of Housing), we do not consider this is an appropriate way forward. 2.57 By way of example, Appendix 2 of BP2: Managing the Delivery of Housing, identifies that Hailsham and Polegate have two of the highest gross affordable housing needs per annum in both quantum (266 and 124 dwellings per annum respectively) and as a percentage of all households (3.1% and 3.4% respectively). Notwithstanding Uckfield (189 dwellings or 3.2%), towns in the North of the District i.e. Heathfield (88 dwellings or 1.8%) and Crowborough (120 dwellings or 1.5%) have the lowest gross need for affordable housing (when compared to the other locations), and yet, are expected to deliver the higher level of affordable dwellings (potentially 50%). This is contrary to the Evidence Base and simply because the viability assessment recognises that areas in the North could deliver a higher percentage of affordable housing, it does not mean they should, especially when the identified ‘need’ is taken into account. We therefore question if this approach is the most suitable when compared to the alternatives and if it is based on credible evidence i.e. this approach is not ‘justified’. 2.58 We do not consider it appropriate that strategic sites identified in any Site Allocation DPD should be required to provide for a greater percentage of affordable housing than as set by Policy WCS8. This is contrary to Circular 05/2005 and the CIL. Given that the majority of strategic sites will also be required to provide for critical elements of infrastructure (dependent on the location) to mitigate against their impact, it is unlikely that sites will remain viable if they are required to deliver a higher level of affordable housing as well as contribute to any necessary infrastructure provision and meet all other financial commitments such as CIL or Code for Sustainable Homes etc. Furthermore, the decreasing availability of grant funding is having significant impact on the ability to deliver higher levels of Affordable Housing. 2.59 Furthermore, the CS (para 5.9) identifies that in the past, 200 dwellings per annum (approximately 50% of overall housing delivery in the District) has been built on unidentified ‘windfall’ sites. Therefore, if the higher affordable housing requirement is applied to only identified sites in a Site Allocation DPD, and the windfall rate continues, then potentially two sites, in the same location could be required to provide different levels of affordable housing simply based on whether they were considered ‘strategic’ or not. The policy does not have any flexibility to accommodate unidentified sites even though para 5.9 of the CS recognises that these sites also have ‘increase in demand on the Districts environmental and infrastructure constraints’. 2.60 Paragraph 8 of PPS1 provides clear intention that ‘This plan-led system, and the certainty and predictability it aims to provide, is central to planning and plays the key role in integrating sustainable development objectives.’ We do not consider that Policy WCS8 or the intention to increase affordable housing for allocated sites provides for this certainty and as such, we propose the following alteration to Policy WCS8: The Council will require affordable housing on sites of 5 or more dwellings (net) or on sites of 0.2ha or more. Affordable housing will be required at a level of 35% of the number of dwellings in any scheme. "Where sites are allocated in a Site Allocations Development Plan Document, that document may specify a different, and potentially higher, housing target, having regards to the findings of the Wealden Housing Viability Assessment and any site specific considerations." (proposed alteration: (Strikethrough) " " shows removal of existing text,

Details of Changes to be Made:
Details of Reasons for Soundess/ Legal Complaince:
With regards to affordable housing, Policy WCS8 does not allow for exceptional circumstances where 35% affordable housing is not achievable due to economic viability (although it is mentioned in paragraph 7.14). It is considered that this should be included in the wording of the policy in order to ensure that a five year supply of housing can be maintained and enable developers to bring forward viable housing development.

Details of Changes to be Made:

Reword Paragraph 2 of WCS8 along the lines that subsequent Development Plan Documents may specify a different Affordable Housing Target with regard to the Housing Viability Assessment and the Strategic Housing Marketing Assessment.

Details of Reasons for Soundess/ Legal Complaince:
The Plan notes the need for flexibility in providing affordable housing following the Strategic Housing Marketing Assessment. It is suggested that Paragraph 2 of the Policy is reworded to indicate the provision may be higher or lower, as indicated in the reasoned justification. Proposed Change

Details of Changes to be Made:
Reword Paragraph 2 of WCS8 along the lines that subsequent Development Plan Documents may specify a different Affordable Housing Target with regard to the Housing Viability Assessment and the Strategic Housing Marketing Assessment.
Representation ID
393
Person ID  Mr  Eddison
521943  Batcheller Monkhouse
Agent ID  Mr  Ide
335759  Batcheller Monkhouse
WCS8 Affordable Housing  Policy 8
Sound  No  Justified  Effective  Consistent with national policy
Legally Compliant  Yes  No

Details of Reasons for Soundess/ Legal Complaince:
The Plan notes the need for flexibility in providing affordable housing following the Strategic Housing Marketing Assessment. It is suggested that Paragraph 2 of the Policy is reworded to indicate the provision may be higher or lower, as indicated in the reasoned justification.

Details of Changes to be Made:
Reword Paragraph 2 of WCS8 along the lines that subsequent Development Plan Documents may specify a different Affordable Housing Target with regard to the Housing Viability Assessment and the Strategic Housing Marketing Assessment.

Representation ID
366
Person ID  Mr  Burrough
521930  Batcheller Monkhouse
Agent ID  Mr  Ide
335759  Batcheller Monkhouse
WCS8 Affordable Housing  Policy 8
Sound  No  Justified  Effective  Consistent with national policy
Legally Compliant  Yes  No

Details of Reasons for Soundess/ Legal Complaince:
The Plan notes the need for flexibility in providing affordable housing following the Strategic Housing Marketing Assessment. It is suggested that Paragraph 2 of the Policy is reworded to indicate the provision may be higher or lower, as indicated in the reasoned justification. Proposed Change

Details of Changes to be Made:
Reword Paragraph 2 of WCS8 along the lines that subsequent Development Plan Documents may specify a different Affordable Housing Target with regard to the Housing Viability Assessment and the Strategic Housing Marketing Assessment.
Details of Reasons for Soundess/ Legal Complaince:
Housing We develop as proposed as in the core strategy we will continue to build some awful estates which I believe are the Cause of family breakdown, depression, mental health issues, vandalism as these estates are lacking in open space and open marketing housing makes most people have a mortgage that is beyond their means, again may I refer you to look at my campaign for change document under land community trust we should not allow developers to build what they want buy they should be instructed to build what is needed, we cannot have open market housing with part time jobs. In the document it states that there is a need for 812 affordable dwellings annually, it then goes on to say that Wealden will deliver 400 homes per year, whilst some of these may be called affordable but in reality they are not and the vast majority of those on the market can bring more people in to the area putting more pressure on social services and school placements. We should stop building open market housing for the life time of this planet.

Details of Changes to be Made:
Conclusion Whilst the strategy plan will appear to have a lot of effort put into it, as it stands it would be a disaster if implemented and I would like to see the secretary of state to call in a public inquiry

Details of Reasons for Soundess/ Legal Complaince:
nb I have also made a similar comment in section 5.7 but consider that this is the more relevant section. I applaud the inclusion of a policy for affordable housing in rural areas but consider that this policy should be expanded to include allowing the development of Low Impact Agricultural Smallholdings. I believe there is at least one instance (in Pembrokeshire, Wales) where a similar policy has already been implemented by a far-sighted local authority. Smallholdings are beneficial socially and environmentally and it can be argued that they are more agriculturally productive and profitable than large industrial farms. As a member of a local smallholders group (Small Farm Training Group) and an active smallholder I am aware that there are many people who want to be smallholders but cannot due to both affordability and lack of suitable properties.

Details of Changes to be Made:
My proposal for a "Low Impact Affordable Agricultural Smallholding" policy is along the following lines: The development of an agricultural smallholding, with a dwelling, should be allowed on agricultural land holdings of five acres or more, subject to existing planning law and also to the following additional restrictions. 1. The domestic curtilage should not occupy not more than one third of an acre. 2. The ownership of the land and the dwelling/curtilage should be linked together ie no partial sale of any part of the holding is allowable. 3. The use of the agricultural land must remain for agricultural puposes such as food production for humans and/or animals, and not be recreational (eg horses, pets, quad bike circuits etc). 4. The dwelling must be carbon-neutral. 5. The dwelling must have its own borehole or well water supply, if conditions allow. 6. Any new agricultural buildings on the agricultural land should be subject to existing planning law.
Representations ID
740
Person ID  Mr Wimbush  Agent ID
520056  Lammas Low Impact Initiatives Ltd
WCS9 Rural Exception Policy 9 Affordable Housing
Sound ☐ Yes ☐ No ☐ Justified ☐ Effective ☐ Consistent with national policy
Legally Compliant ☐ Yes ☐ No
Details of Reasons for Soundness/ Legal Compliance:
A policy could be included allowing low-impact smallholdings
Details of Changes to be Made:

Representation ID
1334
Person ID  Mr Ankers  Agent ID
106660  South Downs Society
WCS9 Rural Exception Policy 9 Affordable Housing
Sound ☑ Yes ☐ No ☐ Justified ☐ Effective ☐ Consistent with national policy
Legally Compliant ☐ Yes ☐ No
Details of Reasons for Soundness/ Legal Compliance:
We support Policy WCS 9: rural Exception Affordable Housing
Details of Changes to be Made:
Details of Reasons for Soundness/ Legal Complaince:
Please refer to the group statement below

Details of Changes to be Made:
We are a group of people, many of whom are members of the Small Farm Training Group (SFTG) which is an association of small farmers and smallholders many of whom live in Wealden District. We believe that agricultural smallholdings are beneficial in many aspects: social, environmental and economic and that more smallholdings should be encouraged. Our experience is that there are many aspirant smallholders who are prevented from becoming such partly due to barriers created by current planning policies. We agree with the need for restrictions which prevent non-agricultural development in the countryside and minimise environmental impact but would support changes in planning policy which will do more to encourage the development of genuine agricultural smallholdings. We authorise Paul Lovatt-Smith to make this statement on our behalf.

Mr Andrew Blackburn & Jo Hart, Lindfield, W Sussex (SFTG Members) Mr Roy and Mrs Patricia Brigden, Ewhurst Green, E Sussex (SFTG Members) Mrs Joyce Byrne, Crowborough, E Sussex (SFTG Member) Miss Jennifer Cloke, Hellingly, E Sussex (SFTG Member) Mr Simon Cramond, Isfield, E Sussex (SFTG Member) Mr Robin de Wilde, Dallington, E Sussex (SFTG Member) Mrs Lorraine Dillon and Mr Rob Gaunt, Horam, E Sussex (SFTG Members) Mrs Tina Fearman, Buxted, E Sussex (SFTG Member) Mr Stuart Fletcher, Wadhurst, E Sussex (SFTG Member) Mr Simon and Mrs Tess Gray, Lower Dicker, E Sussex (SFTG Members) Mr Paul Hamblly, Wadhurst, E Sussex (SFTG Member) Mr John and Mrs Violet Henning, Battle, E Sussex (SFTG Members) Miss Mary Hinton and Mr John Oddie, Heathfield, E Sussex (SFTG Members) Mr Andrew Holbrook, Wartling, E Sussex (SFTG Member) Mr Andrew and Mrs Beverley Lake, E Grinstead, E Sussex (SFTG Members) Mr Paul Lovatt-Smith and Ms Helen Webster, Hellingly, E Sussex (SFTG Members) Mr Tony Mardell & Ms Elaine Pelling, St Leonards, E Sussex (SFTG Members) Ms Pamela McLellan, Uckfield, E Sussex (SFTG Member) Mr Robert and Mrs Vibeke Morfield, Bolney, E Sussex (SFTG Members) Mr Brian and Mrs Pat Paterson, Seaford, E Sussex (SFTG Members) Ms Melanie Powell & Mr Robert Hughes, Hailsham, E Sussex (SFTG Members) Mrs Rosemary Richardson, Ringmer, E Sussex (SFTG Member) Mr Roy Stevens, Woodingdean, E Sussex (SFTG Member) Mrs Anne Tapper, Hellingly, E Sussex (SFTG Member) Mr Dan, Mrs Hannah, Mr Eric and Ms Julie Tebay, Broad Oak, E Sussex (SFTG Members) Mrs Barbara and Mr Steve Thompson, Chailey, E Sussex (SFTG Members) Mrs Valerie and Mr Graham Tye, Robertsbridge, E Sussex (SFTG Members) Mr David and Mrs Annie Woolley, Lindfield, W Sussex (SFTG Members) Ms Angela Lewis, Canterbury, Kent Mrs Tessa James, Herstmonceux, E Sussex (SFTG Members) Ms Zoe Wangler, Lewes, East Sussex Ms Catherine Carr, Uckfield, East Sussex Ms Sara Rose, Hove, East Sussex Mr Steve Niner, Hailsham, East Sussex Mr Malcolm Bosher, Blackheath, London Mr Leo Rutherford, Horam, E Sussex Mr Lawrence Keeley, Herstmonceux, E Sussex Mr Alister and Mrs Sarah Scott, Berwick, E Sussex Mr Malcolm Emery, Herstmonceux, E Sussex
Policy WCS10 and WCS 11 We must object to these two policies on the grounds that the policy will not meet all the local needs that can be reasonably be determined at this stage and that the some of the criteria are not justified rendering the core strategy internally inconsistent. 1. Level of Need First turning to the level of need. The background paper describes the complicated sequence of events relating to the SE partial review and various revisions. It concludes that there is a need for 32 pitches to 2016 which is close to the number (33) assessed by the unfinished panel report. However the latest set of caravan count statistics (the only available evidence which although notoriously unreliable does at least provide minimum figures to work on) show that numbers of caravans have markedly increased over the 2006 baseline. The Jan 2006 data shows 50 caravans, the Jan 2010 data shows 104 caravans in the district. Clearly there is substantial unmet need. There has been only a small apparent change in the level of private provision during this period - 11 caravans on private sites in 2006 and 14 on private sites with permanent planning permission in Jul 2010. The 3 local authority sites in Wealdon are now at capacity (31 caravans as against 23 in 2006, total capacity 31 caravans). In July 2010 there were 11 caravans on sites with only temporary permission (and as such cannot count towards any requirement), one caravan on a tolerated owned site and 9 caravans which are not tolerated. In addition there were 38 caravans on unauthorised encampments. As such there is an immediate and proven residential need for sites for 21 caravans. We estimate that on RSL sites there are 21 pitches and probably a further 9 private pitches with permanent planning permission. There are probably also between 10-15 pitch equivalents without the benefit of permanent permission. This totals 40-45 pitches. Using the standard 3% compound increase to take account of family formation there will be a need for a further 7-8 pitches to 2016 for this need. The total residential need would therefore to 2016 be around 18 to 23 pitches which accords with the levels stated in WVS10. However these levels make no provision at all for need arising from those on unauthorised encampments or those in housing. Clearly there are problems here which can only be satisfactorily cleared up by means of a robust GTAA to be carried out as a matter of urgency. However there are changes which can be made to the needs figures which will go some way to addressing this issue. The unfinished panel report examined this issue at length (para 2.30 et seq) and concluded: 2.38. Most GTAAs justified their 0 or very low assumed need from this source to be on the basis of limited information. We find this to be fundamentally unsound and to effectively ignore such need. We consider that any robust figure of need for gypsy and traveller pitch in the South East should include at least a nominal figure reflecting the undoubted need from this source, and that that figure should be considerably greater than the 72 estimated by the GTAA if it is to make any real difference to addressing even a small proportion of those needs. 2.39. CLG Guidance on Preparing RSS Reviews suggest that ‘RPBs look critically at the way movement between sites and houses is treated in GTAA and whether the conclusions reached and the assumptions made seem reasonable. If the issue is not dealt with at all, it might be fair to regard resulting pitch requirements as likely to be an underestimate’. Page 36 of that Guidance suggests that adjustments to the GTAA figures can be made where there is a significant under- or over-estimate, based either on the formula set out in that study or on the basis of individual judgment of the various elements. That formula takes no explicit account of the needs arising from housed gypsies and travellers and we do not regard it as of any assistance in this matter. 2.40. Although not evidence based, taking into account such information as we do have we Recommend that a figure of 10% of the 2006 baseline plus the recommended needs arising to 2011 should be applied to all county totals and distributed in accordance with the recommended distribution. Across the Region as a whole this represents a need for an additional xx pitches to 2016 (probably about 350) which remains a modest figure, probably substantially less than actual need from this source. We regard this as a reasonable, clearly derived minimum figure but we would encourage future GTAAs to seriously consider how to obtain an evidence-based, locally representative figure of the pitch accommodation requirements of gypsies and travellers living in housing and for local authorities to make a reasoned judgment as to how many of these should be provided for in a future policy. Following this suggestion there would be a need for an additional 6 pitches to make a contribution to this need in line with the panel report (10% of baseline 29 plus recommended requirement of 33). This would mean a need of 30 pitches to be found before 2016, excluding those already provided for since 2006. We are concerned about the conclusion in the background paper (para 5.28) that there is no need for any further transit sites in Wealdon. Clearly the area is used regularly by Gypsies and Travellers as shown by the caravan count figures with regular numbers of unauthorised encampments. The presence of 38 caravans in July 200 is surely prima facie evidence of the need for transit provision in a large district. There clearly is a need for the council to further investigate need in the district and to establish a site if required to ensure that the large district does not become a no-go area for those
passing through or visiting. 2. Criteria The criteria listed do present some problems. The requirement that sites should be close to major roads and/or public transport makes little sense given the recognition by Circular 1/2006 that local authorities should be realistic about alternatives to the car in accessing local services (para 54). This is especially so in view of the recognition by 1/2006 of the difficulties which Gypsies and Travellers have in finding suitable affordable land for their needs. The second criterion contains the phrase ‘be suitable in terms of topography’. Without further detail this is a meaningless term and opens the door to NIMBY objections. The third criterion requires that sites should not lead to a reduction in residential amenity. This means that sites are treated differently from rural exception housing which contains no such term. The use of this phrase would certainly give support to NIMBY objections based on prejudice and is unacceptable. Almost any development of any sort could be held to reduce residential amenity - it is the level of impact balanced against the utility of the development which has to be considered. Hence impact should be measured against acceptability on residential amenity. The fourth criterion would seem to allow rejection of almost any site in an area which has a landscape or nature conservation designation. Circular 1/2006 recognises that sites in nationally designated areas (para 52) that it is the objectives which should not be compromised and also that (para 53) local landscape and local nature conservation designations should not be used in themselves to refuse permission. As it stands this criterion could allow this to happen.

Details of Changes to be Made:
Changes: 1. WCS10 To ensure conformability with the evidence presented above this could be reworded as follows: To meet the needs of Gypsies and Travellers within the district for the period 2006-2016, 37 pitches will be provided for (an additional 30 pitches). Sites will be allocated within the Delivery and Sites Allocation Development Plan document (DPD) to make up for any shortfall. 2. WCS11 a) replace first criterion with “reasonably well related to existing settlements”. This will help ensure a reasonable approach both the accessing land that may be available and ensuring that services can be accessed in a reasonable manner. b) delete ‘be suitable in terms of topography’ from second criterion. In the absence of detailed topographic requirements retention of this phrase would lead to confusion and potentially to arbitrariness. c) We think that reference to residential amenity should be deleted on the grounds that it not included for other forms of housing. However if the Inspector is minded to include some reference then we suggest that the word ‘unacceptable’ be inserted before ‘residential amenity’. d) The fourth criterion I essentially a restatement of 1/2006 and goes beyond it. Therefore we see no reason to include such a criterion. If the Inspector is minded to include such a criterion then it could be usefully amended to read: ‘Areas with nationally recognised designations should be avoided if the development compromises objectives of the designations.”

Representation ID
99
Person ID Mrs de la Rue
Agent ID Derbyshire Gypsy Liaison Group
Paragraph 7.19
Sound ☑ Yes ☐ No ☐ Justified ☐ Effective ☐ Consistent with national policy
Legally Compliant ☑ Yes ☐ No
Details of Reasons for Soundess/ Legal Complaince:
Support paragraph 7.19
Details of Changes to be Made:
Details of Reasons for Soundess/ Legal Complaince:

Eastbourne Borough Council recognises the need in providing residential opportunities for both the settled and travelling communities and the inclusion of Policies setting out the need to provide provision (Policy WCS10) and setting the site criteria for gypsies and travellers (Policy WCS11) will help to reduce unauthorised encampments and help enhanced opportunities for increased social cohesion with the settled community. The site selection criteria established in Policy WCS11 is considered to represent an appropriate balance between the accommodation needs of gypsies, travellers and travelling showpeople, the needs of the settled community, and the need to protect and enhance existing landscape and wildlife assets.

Details of Changes to be Made:

Suggest the following wording for the criteria in policy WSC11: Criterion 1 (reword to comply with paragraph 54 of Circular 01/2006): The site is reasonably accessible to local services and facilities Criterion 2 (reword for clarity and to ensure policy is effective): The site has safe and convenient vehicular access and is located where infrastructure exists, or can be provided, for on site services such as water supply and sewerage disposal Criterion 3 (reword as current criterion unjustified - all development has some level of impact): The site will provide an acceptable level of amenity for the proposed residents and will not have an unacceptable impact on the residential amenity of neighbouring dwellings Criterion 4 (current criterion goes beyond paragraph 53 of Circular 01/2006): Consider rewording this criterion
Representation ID
1336
Person ID  Mr  Ankers  Agent ID
106660  South Downs Society
WCS11 The Travelling Community- Provision for Gypsies, Travellers and Travelling Showpeople: Site Criteria

Sound  Yes  No  Justified  Effective  Consistent with national policy
Legally Compliant  Yes  No

Details of Reasons for Soundess/ Legal Complaince:
We support, within Policy SCS11 (Travelling community) the commitment under "site criteria" that essential features of the national park (and other designations) should not be comprised.

Details of Changes to be Made:

Representation ID
1771
Person ID  Mr  Keeley  Agent ID
104437
WCS11 The Travelling Community- Provision for Gypsies, Travellers and Travelling Showpeople: Site Criteria

Sound  No  Yes  Justified  Effective  Consistent with national policy
Legally Compliant  Yes  No

Details of Reasons for Soundess/ Legal Complaince:
Travellers It would appear again that the councillors are burying their heads in the sand regarding this issue, the travelling community aren't all bad people and with proper sites they could fit into the community, which may wish to do. If you were to see the 10 biggest crooks in Britain, you would find 9 of them living in large houses.

Details of Changes to be Made:
Conclusion Whilst the strategy plan will appear to have a lot of effort put into it, as it stands it would be a disaster if implemented and I would like to see the secretary of state to call in a public inquiry.

Representation ID
514
Person ID  Ashdown  Agent ID
522134  Natural England
WCS12 Biodiversity Policy 12

Sound  No  Yes  Justified  Effective  Consistent with national policy
Legally Compliant  Yes  No

Details of Reasons for Soundess/ Legal Complaince:

Details of Changes to be Made:
Representations on the proposed Core Strategy:

**1335**
**Person ID** Mr Ankers  
**Agent ID** South Downs Society
**WCS12 Biodiversity** Policy 12

**Details of Reasons for Soundness/ Legal Compliance:**
We support Policy WCS 12 - Biodiversity

**Details of Changes to be Made:**

**1436**
**Person ID** Ms Mears  
**Agent ID** Environment Agency
**WCS12 Biodiversity** Policy 12

**Details of Reasons for Soundness/ Legal Compliance:**
We are happy that your Core Strategy seeks to protect and enhance biodiversity in Wealden. We are pleased to see the incorporation of a green infrastructure policy (WCS12) and the proposal for a specific green infrastructure plan which will be delivered through developer contributions.

**Details of Changes to be Made:**

**280**
**Person ID** Mr Hurwood  
**Agent ID** CPRE Sussex, Wealden South Group
**WCS12 Biodiversity** Policy 12

**Details of Reasons for Soundness/ Legal Compliance:**
WCS 12 Whilst generally agreeing with what is said, there does not appear to be a clearly set out strategy at this time. We would wish for a strategy to be an integral part of the LDF. As well as providing protection for the sites set out in appendix 4, we would like to see some positive measures proposed, particularly to provide links between sites; suitable interconnection corridors could be proposed and feature in the LDF. As an example the site BOA74, along the Cuckmere River, should be extended northwards to link with other sites to the north and not leave a large gap across the Low Weald. If thus protected the whole length of the Cuckmere River and would continue to provide a very useful corridor for wildlife, a really useful green pathway, and preserve the whole Cuckmere valley as a unique asset within WDC area.
Details of Reasons for Soundess/ Legal Complaince:
The Core Strategy should consider the principle of "Conservation Credits" currently being trialed by Defra and referred to in the Coalition's joint agreement. It originally appeared within the Conservative’s Green Paper - Open Source Planning. This enables the creation of effective off-setting for land taken out of eco system services and bio diversity. See web site www.environmentbank.com for further information.

Details of Changes to be Made:
That WCS12 Biodiversity should be revised to include the potential use of Conservation Credits.
Details of Reasons for Soundess/ Legal Complaince:
WJPC is concerned at the numerous references to Polegate and Willingdon as one settlement, as highlighted in 3.3 Table 1, 3.11, SPO6, WCS2, WCS3, 5.13, 6.31(2), Figure 8 and Figure 12. In particular, Figure 2 showing settlement hierarchy, places Polegate and Willingdon as one settlement, yet details other settlements individually.

Details of Changes to be Made:

Details of Reasons for Soundess/ Legal Complaince:
Concern raised at the reference to Polegate and Willingdon as one settlement

Details of Changes to be Made:

Details of Reasons for Soundess/ Legal Complaince:
7.23 states 'in order to maximize the benefits, policy places the emphasis on the creation and maintenance of linkages between green spaces.'

Details of Changes to be Made:
What assurances can be provided to PTC that this policy will be applied to protect and maintain the existing green space at Hindsland playing fields which separates the town of Polegate from the parish of Willingdon and Jevington?
7.1.1 Introduction 7.1.1 In this section of the report we present our representations in regard to landscape matters in and informing the Core Strategy. Our representation is made in regard to paragraphs 3.30 – 3.33 of the submission Core Strategy, Policies WC4 and WC13 and supporting background papers. 7.1.2 For the purposes of this representation we have reviewed the ‘Landscape Character Assessment and Development Option Evaluation Study’ undertaken for the district (referred hereinafter as the ‘Landscape Study’), which is included as a background paper to the Core Strategy on the Councils website. However, it is not clear how the Landscape Study has been used to inform the spatial strategy as it is not specifically referred to in the text of Core Strategy nor is the Landscape Study listed as a background paper at paragraph 1.7 of the Core Strategy (although it is included as a background paper on the Councils website). 7.1.3 We have reviewed the methodology set out in the document and we have also reviewed whether the methodology has been consistently applied resulting in a final report that is robust, thorough and transparent and one that would form a credible evidence base suitable to inform the spatial strategy contained in the Core Strategy. 7.1.4 We contend that the Landscape Study is flawed and therefore the assessment of housing sites in the district, the spatial strategy and the Councils Sustainability Appraisal, and thus the Core Strategy, is unsound. 7.1.5 Our representation is summarised below: Section of Core Strategy: Spatial Planning Objectives 1, 3 and 11, Paras 3.30 - 3.33, Policy WCS4 Strategic Development Areas, Framework. The Landscape Study is not listed as a background paper at paragraph 1.7 of the Core Strategy (although it is included as a background paper on the Councils website). Policy WCS4 Strategic Development Areas and Paragraphs 6.9 and 6.11, Policy WSC13 Green Infrastructure, Paras 7.23 - 7.28Legally Compliant: -Sound: No;Justified: No;Effective: No;Consistent with national policy: No 7.1.6 Paragraph 3.30 of the Proposed Submission Core Strategy refers to Wealden’s environmental attributes and that they have an important part to play in the development of the spatial strategy and ‘had a significant impact upon the assessment of the suitability of housing land in relation to the SHLAA’. 7.1.7 Paragraph 3.30 goes on to state that: “...and sites have been carefully scrutinised with regards to landscape impact.” 7.1.8 Paragraph 3.33 refers to Government guidance and the level of protection this provides for the environment, particularly nationally and internationally designated sites, which are not duplicated in the Core Strategy. The paragraph goes on to state: “However, our strategy has been guided by high levels of protection on local and national levels, and more detailed policies are contained within the Core Strategy and further ones in subsequent DPDs.” 7.1.9 Paragraph 1.7 in the Introduction to the Core Strategy refers to a number of specialist studies that have been produced to provide a robust evidence base to inform the Local Development Framework. The Landscape Study is not listed as a background paper at paragraph 1.7 of the Core Strategy (although it is included as a background paper on the Councils website). Policy WCS4 Strategic Development Areas and Paragraphs 6.9 and 6.11 The Core Strategy proposes that the land to the west of Uckfield be identified as a ‘strategic development area’ suitable for accommodating 1,000 homes and some 12,650 sq metres net of employment floor space and education provision as an extension to the urban area to the west of New Town. Paragraph 6.9 refers to the SHLAA and assessment of the potential sites at the fringes of the urban area. 7.1.11 In the light of the comments that follow in this section of our representations on the Landscape Study, it considered that this proposal be reassessed and, taking into account other representations made on other parts and policies contained in the Core Strategy, greater emphasis should be given to the suitability of land at Maresfield to accommodate increased housing numbers and a larger proportion of the housing requirements for the district. Policy WSC13 Green Infrastructure, Paragraphs 7.23 - 7.28 and Background Paper BP6 7.1.12 Policy WSC13 and paragraph 7.23 to 7.28 relating to Green Infrastructure is supported although it is considered that the anomalies and errors in the Landscape Study be addressed before this document is used to guide the implementation of Green Infrastructure Strategy and also formulation of the specific measures for the protection and enhancement of the landscape which are to be set out in the Delivery and Site Allocations DPD referred to at paragraph 7.28 of the Core Strategy. 7.1.13 It is not clear from reading the Core Strategy, how the Landscape Study has been used to inform the above policies. 7.2 Consideration of the Methodology employed in the Landscape Study 7.2.1 Wealden Council commissioned the Landscape Study from the Landscape Group at East Sussex County Council, in September 2007. It was published in February 2009. The purpose of the Study is to: 1. Inform the preparation of WDC Local Development Framework Core Strategy and; 2. Inform the development policies on landscape management and protection. 7.2.2 The Landscape Study states that it will: 1. Assess the existing landscape character of key search areas 2. Assess the quality and value of the existing landscape in these key search areas 3. Assess the sensitivity if the existing landscape and its capacity to accept change or having regard to the scope for mitigation 4. Make recommendations on preferred locations from a landscape perspective. 7.2.3 The Landscape Study purports to use a number of methodologies for the assessment and
identifies these as being: 1. For Landscape Character/ Quality and Value - Design Manual for Roads and Bridges Vol 11, section 3, Part 5 (DT) which has been further refined by the Landscape Character Assessment Guidance for England and Scotland (CA/SNH 2002) and; 2. For landscape sensitivity – Landscape Character Assessment Guidance for England and Scotland, Topic Paper No.6: Techniques and criteria for Judging Capacity and Sensitivity (CA 2002). 7.2.4 The Landscape Study sets out, in section 2.0, the methodology and criteria used for each aspect of the landscape being assessed, including the following: 1. Landscape Quality (this should be ‘condition’ if following latest LCA guidance as the term quality is now a discredited approach to assessing landscapes) 2. Landscape Value 3. Landscape Sensitivity 4. Visual Sensitivity 5. Landscape Capacity 7.2.5 In relation to the assessment of landscape capacity, capacity is defined in Topic Paper No.6: ‘Techniques and Criteria for Judging Capacity and Sensitivity’ as: ‘The degree to which a particular landscape type or area is able to accommodate change without significant effect on its character, or overall change of landscape character type. Capacity is likely to vary according to the type and nature of change being proposed’. 7.2.6 We have reviewed the Landscape Study, in particular, the methodology set out in the document and whether this has been consistently applied to form a credible evidence base suitable to inform the spatial strategy contained in the Core Strategy.

7.2.7 The review of the Core Strategy background paper indicates that the Landscape Study has not followed the guidance in Topic Paper No.6. Topic Paper No.6 suggests that there are two approaches to assessing landscape sensitivity. These are: 1. Judging Overall Landscape Sensitivity and; 2. Judging Landscape Sensitivity to a specific type of change. 7.2.8 However, in order to assess landscape capacity, the assessment of the sensitivity of different types or areas of landscape to the type of change in question must be combined with an assessment of the more subjective or perceptual aspects of the landscape and of the value attached to the landscape. 7.2.9 The stages for assessing landscape capacity of a landscape are set out in Section 3.0 of Topic Paper No.6 and reproduced in Figure 7.1 below. Figure 7.1: Stages for assessing landscape capacity Source: Landscape Character Assessment Guidance for England and Scotland, Topic Paper No.6: Techniques and criteria for Judging Capacity and Sensitivity (CA 2002) 7.2.10 Sections 5.0 and 6.0 of Topic Paper No.6 provide the more detailed considerations that need to be taken into account. 7.2.11 The boxed text, at paragraph 2.11.2 of the Landscape Study, follows the same assessment stages used to assess the landscape capacity to accommodate a specific type of change and given the local scale of the assessment work it is considered that this is the appropriate method to use. 7.2.12 However, Topic Paper No.6, at paragraph 6.5, also goes on to state that: ‘Capacity is all a question of the interaction between the sensitivity of the landscape, the type and amount of change and the way that the landscape is valued’. 7.2.13 Sections 2.11 and 2.12 of the Landscape Study set out the approach used by East Sussex County Council landscape group in undertaking the landscape study. However, the assessment does not define the quantum of housing development used to assess the capacity of each character area, nor is the LDF Core Issues and Options Consultation Paper July 2007 referred to as a guide to the quantum of housing development used to assess each of the different character areas. The Landscape Study does however state at paragraph 2.12.3 that: ‘an overall assessment can be made for each character area on the capacity to accept the type of change being considered. This judgement is made according to the combination of characteristics that contribute to a particular area of landscape. The capacity of an area to accept change is related to the potential of the area to accommodate development in a particular location without detracting from the overall character of that landscape. The capacity evaluation of each character area does not assume that this is the capacity across the entire character area’. 7.2.14 There are a number interrelated issues raised in the above paragraph which we now turn to. 7.2.15 In relation to the type of change, the Landscape Study defines, at paragraph 2.12.6, the assumptions used for the assessment business uses, i.e. the assessment of sensitivity / capacity is based on light industrial type uses which would be consistent with a residential environment and these would be single storey units. However the Landscape Study does not define the full details of the housing use, such as type (housing - single storey / two storey / three storey etc) or amount (large / medium / small scale development) and we contend that the details of the change being considered is not transparent from the Landscape Study, as although the type of change (i.e. housing) is known, the form and amount of housing is unknown. These are important factors when considering the landscape capacity of an area to accommodate development, especially if using the stages set in the Landscape Study. 7.2.16 A similar assumption to the business use (or range of assumptions) could have been used for assessing the impact on housing on landscape sensitivity / capacity of each character area. For example two to three storey houses at the following ranges: 1. small scale housing between five to 50 dwellings 2. medium scale housing development between 50 to 200 dwellings, and 3. large scale housing development between 200 to 500 dwellings. 7.2.17 In relation to the combination of the characteristics that contribute to a particular area, comments on these are made in later sections (See paragraphs 7.4.1 to 7.4.14 below). 7.2.18 The Landscape Study also refers to mitigation and management of the landscape (Section 2.13) and, in paragraph 2.13.1, it highlights that mitigation has been used to determine the visual and character sensitivity of the landscape. This approach does not accord with Topic Paper No.6 as mitigation should only be used to inform the visual sensitivity of the area assessed, (See Figure 7.1 above), and not directly the character sensitivity of an area (although visual aspects are one of the aspects that inform the character of an area). Mitigation in itself can have a significant effect on character and the landscapes capacity to accommodate development. In some cases mitigation would make an area less suitable to accommodate development not more suitable. Again this, we would contend, is a flaw in the assessment. The existing management of the landscape is relevant to determining the condition (or quality) of an area of landscape but the identification of management opportunities is not relevant to determining the capacity of the landscape to
accommodate development. Management of the land could in itself bring about a change to the landscape which is
discordant with its character, for instance managing the land to encourage woodland growth or planting
extensive woodlands in a very open exposed landscape would lead to a significant change. 7.2.19 The
methodology section of the Landscape Study also includes a part dealing with the Areas of Outstanding Natural
Beauty (AONB) within the district. Section 2.14 refers to ‘AONBs and AONB Buffer Zones’ as a way of identifying
higher value landscapes within Wealden. At paragraph 2.14.2 the Landscape Study states: ‘There is, in some
areas adjacent to the AONB boundary a buffer zone to the AONB landscape. This is usually an area of similar
designation but not of the same quality as the AONB landscape and not covered by the same planning policy. Where
relevant these areas are indicated in the figures’. 7.2.20 Paragraph 2.14.4, the Landscape Study goes on the state
the following: ‘These buffer zones have been identified through the character area analysis. The relative sensitivity
of these areas has been considered according to the landscape character to achieve a balanced comparison with
AONB and AONB landscapes’. 7.2.21 The Landscape Study considers that there is support for this ‘buffer zone’
approach due to Policy EN2 (f) of the East Sussex and Brighton and Hove Structure Plan. We contend that this
approach is flawed and unsound. Firstly, the Structure Plan has been superseded by the South East Plan and at
the time of preparing the Landscape Study during the period August 2007 to February 2009, both East Sussex
County Council and Wealden District Council would have been aware of the emerging South East Plan policies
through the draft regional plan. Secondly, Policy EN2 (f) does not prohibit development but seeks to protect the
Sussex Downs and High Weald AONBs and minimise the impact of development within them by requiring
measures to integrate the development into the landscape. Thirdly, there is no Government policy support for the
concept of ‘AONB buffers’ in Planning Policy Statement No.7. Like Policy EN2 of the Structure Plan, PPS 7 does
not prohibit development within the boundaries or adjoining an AONB but merely seeks to ensure that the
landscapes within AONBs are considered carefully and appropriate measures taken to mitigate the harm that
potential development may cause. 7.2.22 The fourth point is that, whilst the Council would seek support from
Policy EN2 (f) as a way of ‘balancing the comparison between AONB and non AONB areas’ especially the areas of
landscape close to the AONB boundary, the East Sussex and Brighton and Hove Structure Plan does not define
the extent of the buffer zone on the Key Diagram nor is the extent of the buffer area set out in its explanatory text.
We contend that the justification for this approach must be given very little weight. 7.2.23 Lastly, it is
acknowledged that some areas of landscape within an AONB may be of poorer condition (quality) score and / or
lower visual and character sensitivity than areas outside of the AONB but the adjustment in the landscape
sensitivity / capacity scoring by introducing what appears to be an arbitrary AONB buffer zone seems to undermine
the purposes and status of the AONB designation,(and its planning policy protection), by attaching increased value
to a character area that adjoins the AONB which although it may be of a similar character, does not meet the
quality criteria for inclusion within the AONB. In addition, it is noted that the Landscape Study has not been subject
to peer review and there is no evidence that it has had stakeholder input / consultation with statutory consultees,
such Natural England / High Weald AONB Joint Advisory Committee and other interested bodies to agree this
approach to the AONBs. 7.2.24 The Study goes on to set out the method used to undertake a comparative
evaluation of a potential development area within a character area which has capacity to accommodate
development. This gives an early indication of sites which would be worthy of further consideration for
development in landscape terms. We contend that the comparative assessment of character areas within the
District is flawed as the starting point for the assessment the landscape sensitivity / capacity analysis is unsound
for the reason given above. 7.2.25 Notwithstanding the above point, Section 2.15.4 of the Landscape Study states
that: ‘Prior to coming to a firm view on the full potential and scope in these areas further investigation would be
required’. 7.2.26 However, the Study does not present evidence of this further investigation or how preferred
development areas have been chosen; for example there is no detailed assessment of the west of Uckfield area
although this has been identified as a major urban extension area under Policy WCS4 - SD1. 7.3 Critical Review of
the findings of the Landscape Study 7.3.1 The Landscape Study methodology sets out how each landscape
character is to be assessed and the information recorded using landscape character assessment sheets (section
2.5) whilst section 2.17 of the Landscape Study refers to mapping which is split into two stages. Stage 1 relates to
recording baseline information on each character area such as planning designation, Public Right of Way and key
viewpoint, focal point, landscape features and detractors (which should be read with the assessment record
sheets). Stage 2 relates to the identification of potential development areas with indicative boundaries and also
identifies key woods, shaws, hedges, tree belts etc and also the potential for mitigation planting. 7.3.2 In order to
assess the robustness of the landscape capacity study for the purpose of this representation, the area around
Uckfield, Maresfield and Five Ash Down were visited and the baseline information recorded on the landscape
assessment sheets checked and the judgements reached reviewed. This check revealed that that were a number of
elements / features not recorded or identified for some areas and therefore these factors were not able to
inform the judgement reached. 7.3.3 For example, ‘Maresfield Area A’, is described as: ‘An open, undulating
landscape used for pasture to the west and pleasure to the east. It is ungrazed showing some scrub. Wide long
views to the south. Surrounded on other sides by mature trees and exotic Eucalyptus and Cedars from nearby
Park. Fine houses on outskirts and within site. Fine clumps of Pines. Some road noise adjoins picturesque
recreation ground’. 7.3.4 The assessment sheet omits a number of important features such as areas of woodlands
and plantations, (some of which are ancient woodlands and provide screening, containment and form visual
barriers). Hedges, fences, footpaths and reference to the bypass were not recorded. The assessment sheet also
refers to parkland and that the majority of the land is amenity land lacking management. A wide long view(s) out to
the south is highlighted as a key feature which is correct when looking south from a small part of the area but
evertheless views are contained and obscured by landform and vegetation. The record sheet includes a photograph
of the view south but this is not taken from the urban fringe as recorded on the map Figure 52. The
photograph was taken from private land on the footpath. 7.3.5 In the visual appraisal section of the assessment
sheet it records the local receptors as amenity land and houses, types of view as long views from top of ridge to
the south and visual barriers as landform / trees and hedges. It concludes that the sensitivity is high (see table 7.1
below). It is acknowledged that there are views within the area but these tend to be short partial or glimpsed views
with long views out towards the south from high ground in the north eastern parts of character area. Views into the
area are very limited and development within the area would have a minimal impact on views. However, in views
from the ridge to the south the recreation occupying the north eastern parts of the character area is seen whilst the
remaining areas are hidden from view and therefore the visual sensitivity of the majority of the area is low. 7.3.6
The resultant evaluation of this area was considered as follows: Table 7.1: Landscape Study Assessment,
Maresfield Area A Character Area Maresfield A Quality Good Value Medium Sensitivity to Change Moderate
Visual Sensitivity High Management Opportunities Mange hedges and grazing. Mange recreational spaces and
access to countryside. Need to retain gap between Maresfield and Uckfield. Potential for Mitigation LowPlanting
would change open character and obscure long views out from recreation ground Capacity to Accept Change:
Housing LowClose to village edge only Capacity to Accept Change: Business Low 7.3.7 We contend that the
record sheets are incorrect and the judgement on quality / condition is erroneous and should be ‘ordinary’ as most
of the land is unmanaged comprising rank grassland of little intrinsic landscape value and the visual sensitivity of
the area is ‘moderate or low’ due to the strong enclosure afforded to the area. It is interesting to note that one of
the management opportunities is to retain a gap between Maresfield and Uckfield although there is no planning
policy support for the retention of gaps in the Core Strategy or previous Non Statutory Wealden Local Plan. 7.3.8
By comparison, another example is Character Area L – land to the west of Uckfield, which is described as: ‘Land
sloping away from urban edge to Uck valley and A26 Uckfield by pass. Strong field structure with arable and
pasture. Some large fields. Sewage works detractors. Few focuses of character. Development would need a well
defined edge to prevent creep’. 7.3.9 The assessment sheet for this character area has recorded the land cover
and landscape elements correctly but has not recorded any landform features and relatively few aesthetic factors,
although it describes the land as sloping away from the urban edge with a strong field structure with arable and
pasture. The landscape condition is considered to be fair which is not defined in the methodology although this
changes to ordinary in the comparison table. 7.3.10 In the visual appraisal section of the assessment sheet it
records the local receptors as countryside on the other side of Uck Valley, isolated properties, footpaths and A26
and houses on the urban edge, types of view as views across to woods at West Park / Butchers Wood, wooded
ridge of Shortbridge across Uckfield Valley and visual barriers as few. It concludes that the sensitivity is ‘moderate’
(see table 7.2), Table 7.2: Landscape Study Assessment, Uckfield Area L Character Area Uckfield L Quality
Ordinary Value Medium Snaw Accessible for recreation Sensitivity to Change Moderate Visual Sensitivity Moderate
High on ridge Management Opportunities Mange urban fringe. Farm diversification pressure. Manage wood and
existing trees and hedges Potential for Mitigation Moderate Low on ridge as need to retain open fields Soften urban
distributions. Create green network. Relocate recreation ground Capacity to Accept Change: Housing Moderate Need
well defined boundaries close to urban edge avoid high ground Capacity to Accept Change: Business No capacity.
7.3.11 We contend that the record sheets are incorrect and the judgement on quality / condition is under estimated
and should be ‘good’ as most of the land is attractive farmed landscape with some distinctiveness features with a
recognisable landscape structure. The assessment sheet ignores the open exposed nature of this character area,
with long views south and west and numerous views in to the area from the surrounding countryside (roads and
footpaths), and therefore the visual sensitivity of the area should be ‘high’ due the number of viewpoints where
views can be obtained. This can be compared to the Maresfield A area which is considered to have ‘high’
sensitivity rating but with a few vantage points available where development impacts will be perceived. 7.3.12 We
also note that under management opportunities it is considered that the area could contribute to managing the
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These examples illustrate the inconsistency of the landscape assessment record sheet and the arbitrary nature of
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Landscape Study has been undertaken or to the transparent way that the judgements have been reached. 7.4.4 We contend that the Landscape Study is flawed and therefore the assessment of housing sites in the district, the spatial strategy and the Council's Sustainability Appraisal is unsound. In addition, in relation to the comparison assessment of sites within the district surrounding the towns and villages; we contend that this comparative assessment of character areas is flawed as the starting point for the assessment the landscape sensitivity / capacity analysis is unsound for the reason given above. 7.4.5 The Core Strategy proposes that the land to the west of Uckfield be identified as a 'strategic development area' suitable for accommodating 1,000 homes and some 12,650 sq metres net of employment floor space and education provision as an extension to the urban area to the west of New Town. In the light of the comments made on the Landscape Study, it is considered that this proposal be reassessed and, (taking into account the other representations made on other parts and policies contained in the Core Strategy), greater emphasis be given to the suitability of land at Maresfield to accommodate increased housing numbers and a larger proportion of the housing requirements for the district. 7.4.6 Policy WSC13 relating to Green Infrastructure is supported although it is considered that the anomalies and errors in the Landscape Study be addressed before this document is used to inform and guide the implementation of Green Infrastructure Strategy and also formulation of the specific measures for the protection and enhancement of the landscape which are to set out in the Delivery and Site Allocations DPD referred to at paragraph 7.28 of the Core Strategy.

Details of Changes to be Made:
SUMMARY 7.4.7 In conclusion, we contend that the Core Strategy is unsound because: 1. It is not justified as it is not based on a sound evidence base as the Landscape Study (Landscape Character Assessment and Development Options Evaluation Study of the District) is flawed and therefore the assessment of housing sites in the district, the spatial strategy and the Council's Sustainability Appraisal is unsound. It is not clear how the Landscape Study has been used to inform the spatial strategy as it is not specifically referred to in the Core Strategy nor is the Landscape Study listed as a background paper at paragraph 1.7 of the Core Strategy; 2. It is not justified because the Landscape Study as it is not robust, thorough, and transparent and that it does not form a credible evidence base suitable to inform the spatial strategy contained in the Core Strategy. The Landscape Study contains a number inconsistencies set out in the landscape assessment record sheets and contains a number of arbitrary judgements and so it does not give any confidence to the manner in which the Landscape Study has been undertaken or to the transparent way that the judgements have been reached 3. It is not consistent with national policy as the methodology for undertaking the Landscape Study (which has been used to inform the spatial strategy) refers to 'AONB and AONB Buffer Zones' as a way of identifying higher value landscapes. There are a number of reasons why this approach is unsound but there is no Government policy support for the concept of 'AONB buffers' in Planning Policy Statement No.7 or any other policy guidance.
Paragraph 7.24

Sound ☐ Yes ☑ No ☑ Justified ☐ Effective ☑ Consistent with national policy

Legally Compliant ☐ Yes ☑ No

Details of Reasons for Soundess/Legal Complaince:

7 Landscape 7.1 Introduction 7.1.1 In this section of the report we present our representations in regard to landscape matters in and informing the Core Strategy. Our representation is made in regard to paragraphs 3.30 – 3.33 of the submission Core Strategy, Policies WC4 and WC13 and supporting background papers. 7.1.2 For the purposes of this representation we have reviewed the ‘Landscape Character Assessment and Development Option Evaluation Study’ undertaken for the district (referred hereinafter as the ‘Landscape Study’), which is included as a background paper to the Core Strategy on the Councils website. However, it is not clear how the Landscape Study has been used to inform the spatial strategy as it is not specifically referred to in the text of Core Strategy nor is the Landscape Study listed as a background paper at paragraph 1.7 of the Core Strategy (although it is included as a background paper on the Councils website). 7.1.3 We have reviewed the methodology set out in the document and we have also reviewed whether the methodology has been consistently applied resulting in a final report that is robust, thorough and transparent and one that would form a credible evidence base suitable to inform the spatial strategy contained in the Core Strategy. 7.1.4 We contend that the Landscape Study is flawed and therefore the assessment of housing sites in the district, the spatial strategy and the Councils Sustainability Appraisal, and thus the Core Strategy, is unsound. 7.1.5 Our representation is summarised below: Section of Core Strategy: Spatial Planning Objectives 1, 3 and 11, Paras 3.30 - 3.33, Policy WCS4 Strategic Development Areas, Framework. The Landscape Study is not listed as a background paper at paragraph 1.7 of the Core Strategy (although it is included as a background paper on the Councils website). 7.1.6 Paragraph 3.30 of the Proposed Submission Core Strategy refers to Wealden’s environmental attributes and that they have an important part to play in the development of the spatial strategy and ‘had a significant impact upon the assessment of the suitability of housing land in relation to the SHLAA’. 7.1.7 Paragraph 3.30 goes on to state that: ‘...and sites have been carefully scrutinised with regards to landscape impact.” 7.1.8 Paragraph 3.33 refers to Government guidance and the level of protection this provides for the environment, particularly nationally and internationally designated sites, which are not duplicated in the Core Strategy. The paragraph goes on to state: “However, our strategy has been guided by high levels of protection on local and national levels, and more detailed policies are contained within the Core Strategy and further ones in subsequent DPDs.” 7.1.9 Paragraph 1.7 in the Introduction to the Core Strategy refers to a number of specialist studies that have been produced to provide a robust evidence base to inform the Local Development Framework. The Landscape Study is not listed as a background paper at paragraph 1.7 of the Core Strategy (although it is included as a background paper on the Councils website). Policy WCS4 Strategic Development Areas and Paragraphs 6.9 and 6.11 7.1.10 The Core Strategy proposes that the land to the west of Uckfield be identified as a ‘strategic development area’ suitable for accommodating 1,000 homes and some 12,650 sq metres net of employment floor space and education provision as an extension to the urban area to the west of New Town. Paragraph 6.9 refers to the SHLAA and assessment of the potential sites at the fringes of the urban area. 7.1.11 In the light of the comments that follow in this section of our representations on the Landscape Study, it considered that this proposal be reassessed and, taking into account other representations made on other parts and policies contained in the Core Strategy, greater emphasis should be given to the suitability of land at Maresfield to accommodate increased housing numbers and a larger proportion of the housing requirements for the district. Policy WSC13 Green Infrastructure, Paragraphs 7.23 – 7.28 and Background Paper BP6 7.1.12 Policy WSC13 and paragraph 7.23 to 7.28 relating to Green Infrastructure is supported although it is considered that the anomalies and errors in the Landscape Study be addressed before this document is used to inform and guide the implementation of Green Infrastructure Strategy and also formulation of the specific measures for the protection and enhancement of the landscape which are to set out in the Delivery and Site Allocations DPD referred to at paragraph 7.28 of the Core Strategy. 7.1.13 It is not clear from reading the Core Strategy, how the Landscape Study has been used to inform the above policies. 7.2 Consideration of the Methodology employed in the Landscape Study 7.2.1 Wealden Council commissioned the Landscape Study from the Landscape Group at East Sussex County Council, in September 2007. It was published in February 2009. The purpose of the Study is to: 1. Inform the preparation of WDC Local Development Framework Core Strategy and; 2. Inform the development policies on landscape management and protection. 7.2.2 The Landscape Study states that it will: 1. Assess the existing landscape character of key search areas 2. Assess the quality and value of the existing landscape in these key search areas 3. Assess the sensitivity if the existing landscape and its capacity to accept change or having regard to the scope for mitigation 4. Make recommendations on preferred locations from a landscape perspective. 7.2.3 The Landscape Study purports to use a number of methodologies for the assessment and
identifies these as being: 1. For Landscape Character/ Quality and Value - Design Manual for Roads and Bridges Vol 11, section 3, Part 5 (DT) which has been further refined by the Landscape Character Assessment Guidance for England and Scotland (CA/SNH 2002) and; 2. For landscape sensitivity – Landscape Character Assessment Guidance for England and Scotland, Topic Paper No.6: Techniques and criteria for Judging Capacity and Sensitivity (CA 2002). 7.2.4 The Landscape Study sets out, in section 2.0, the methodology and criteria used for each aspect of the landscape being assessed, including the following: 1. Landscape Quality (this should be ‘condition’ if following latest LCA guidance as the term quality is now a discredited approach to assessing landscapes) 2. Landscape Value 3. Landscape Sensitivity 4. Visual Sensitivity 5. Landscape Capacity 7.2.5 In relation to the assessment of landscape capacity, capacity is defined in Topic Paper No.6: ‘Techniques and Criteria for Judging Capacity and Sensitivity’ as: ‘The degree to which a particular landscape type or area is able to accommodate change without significant effect on its character, or overall change of landscape character type. Capacity is likely to vary according to the type and nature of change being proposed’. 7.2.6 We have reviewed the Landscape Study, in particular, the methodology set out in the document and whether this has been consistently applied to form a credible evidence base suitable to inform the spatial strategy contained in the Core Strategy. 7.2.7 The review of the Core Strategy background paper indicates that the Landscape Study has not followed the guidance in Topic Paper No.6. Topic Paper No.6 suggests that there are two approaches to assessing landscape sensitivity. These are: 1. Judging Overall Landscape Sensitivity and; 2. Judging Landscape Sensitivity to a specific type of change. 7.2.8 However, in order to assess landscape capacity, the assessment of the sensitivity of different types or areas of landscape to the type of change in question must be combined with an assessment of the more subjective or perceptual aspects of the landscape and of the value attached to the landscape. 7.2.9 The stages for assessing landscape capacity of a landscape are set out in Section 3.0 of Topic Paper No.6 and reproduced in Figure 7.1 below. Figure 7.1: Stages for assessing landscape capacity Source: Landscape Character Assessment Guidance for England and Scotland, Topic Paper No.6: Techniques and criteria for Judging Capacity and Sensitivity (CA 2002) 7.2.10 Sections 5.0 and 6.0 of Topic Paper No.6 provide the more detailed considerations that need to be taken into account. 7.2.11 The boxed text, at paragraph 2.11.2 of the Landscape Study, follows the same assessment stages used to assess the landscape capacity to accommodate a specific type of change and given the local scale of the assessment work it is considered that this is the appropriate method to use. 7.2.12 However, Topic Paper No.6, at paragraph 6.5, also goes on to state that: ‘Capacity is all a question of the interaction between the sensitivity of the landscape, the type and amount of change and the way that the landscape is valued’. 7.2.13 Sections 2.11 and 2.12 of the Landscape Study set out the approach used by East Sussex County Council landscape group in undertaking the landscape study. However, the assessment does not define the quantum of housing development used to assess the capacity of each character area, nor is the LDF Core Issues and Options Consultation Paper July 2007 referred to as a guide to the quantum of housing development used to assess each of the different character areas. The Landscape Study does however state at paragraph 2.12.3 that: ‘an overall assessment can be made for each character area on the capacity to accept the type of change being considered. This judgement is made according to the combination of characteristics that contribute to a particular area of landscape. The capacity of an area to accept change is related to the potential of the area to accommodate development in a particular location without detracting from the overall character of that landscape. The capacity evaluation of each character area does not assume that this is the capacity across the entire character area’ 7.2.14 There are a number interrelated issued raised in the above paragraph which we now turn to. 7.2.15 In relation to the type of change, the Landscape Study defines, at paragraph 2.12.6, the assumptions used for the assessment business uses, i.e. the assessment of sensitivity / capacity is based on light industrial type uses which would be consistent with a residential environment and these would be single storey units. However the Landscape Study does not define the full details of the housing use, such as type (housing - single storey / two storey / three storey etc) or amount (large / medium / small scale development) and we contend that the details of the change being considered is not transparent from the Landscape Study, as although the type of change (i.e. housing) is known, the form and amount of housing is unknown. These are important factors when considering the landscape capacity of an area to accommodate development, especially if using the stages set in the Landscape Study. 7.2.16 A similar assumption to the business use (or range of assumptions) could have been used for assessing the impact on housing on landscape sensitivity / capacity of each character area. For example two to three storey houses at the following ranges: 1. small scale housing between five to 50 dwellings 2. medium scale housing development between 50 to 200 dwellings, and 3. large scale housing development between 200 to 500 dwellings. 7.2.17 In relation to the combination of the characteristics that contribute to a particular area, comments on these are made in later sections (See paragraphs 7.4.1 to 7.4.14 below). 7.2.18 The Landscape Study also refers to mitigation and management of the landscape (Section 2.13) and, in paragraph 2.13.1, it highlights that mitigation has been used to determine the visual and character sensitivity of the landscape. This approach does not accord with Topic Paper No.6 as mitigation should only be used to inform the visual sensitivity of the area assessed, (See Figure 7.1 above), and not directly the character sensitivity of an area (although visual aspects are one of the aspects that inform the character of an area). Mitigation in itself can have a significant effect on character and the landscapes capacity to accommodate development. In some cases mitigation would make an area less suitable to accommodate development not more suitable. Again this, we would contend, is a flaw in the assessment. The existing management of the landscape is relevant to determining the condition (or quality) of an area of landscape but the identification of management opportunities is not relevant to determining the capacity of the landscape to...
accommodate development. Management of the land could in itself bring about a change to the landscape which is discordant with its character, for instance managing the land to encourage woodland growth or planting extensive woodlands in a very open exposed landscape would lead to a significant change. 7.2.19 The methodology section of the Landscape Study also includes a part dealing with the Areas of Outstanding Natural Beauty (AONB) within the district. Section 2.14 refers to ‘AONBs and AONB Buffer Zones’ as a way of identifying higher value landscapes within Wealden. At paragraph 2.14.2 the Landscape Study states: ‘There is, in some areas adjacent to the AONB boundary a buffer zone to the AONB landscape. This is usually an area of similar character but not of the same quality as the AONB landscape and not covered by the same planning policy. Where relevant these areas are indicated in the figures’. 7.2.20 Paragraph 2.14.4, the Landscape Study goes on the state the following: ‘These buffer zones have been identified through the character area analysis. The relative sensitivity of these areas has been considered according to the landscape character to achieve a balanced comparison with AONB and AONB landscapes’. 7.2.21 The Landscape Study considers that there is support for this ‘buffer zone’ approach due to Policy EN2 (f) of the East Sussex and Brighton and Hove Structure Plan. We contend that this approach is flawed and unsound. Firstly, the Structure Plan has been superseded by the South East Plan and at the time of preparing the Landscape Study during the period August 2007 to February 2009, both East Sussex County Council and Wealden District Council would have been aware of the emerging South East Plan policies through the draft regional plan. Secondly, Policy EN2 (f) does not prohibit development but seeks to protect the Sussex Downs and High Weald AONBs and minimise the impact of development within them by requiring measures to integrate the development in to the landscape. Thirdly, there is no Government policy support for the concept of ‘AONB buffers’ in Planning Policy Statement No.7. Like Policy EN2 of the Structure Plan, PPS 7 does not prohibit development within the boundaries or adjoining an AONB but merely seeks to ensure that the landscapes within AONBs are considered carefully and appropriate measures taken to mitigate the harm that potential development may cause. 7.2.22 The fourth point is that, whilst the Council would seek support from Policy EN2 (f) as a way of ‘balancing the comparison between AONB and non AONB areas’ especially the areas of landscape close to the AONB boundary, the East Sussex and Brighton and Hove Structure Plan does not define the extent of the buffer zone on the Key Diagram nor is the extent of the buffer area set out in its explanatory text. We contend that the justification for this approach must be given very little weight. 7.2.23 Lastly, it is acknowledged that some areas of landscape within an AONB may be of poorer condition (quality) score and / or lower visual and character sensitivity than areas outside of the AONB but the adjustment in the landscape sensitivity / capacity scoring by introducing what appears to be an arbitrary AONB buffer zone seems to undermine the purposes and status of the AONB designation, (and its planning policy protection), by attaching increased value to a character area that adjoins the AONB which although it may be of a similar character, does not meet the quality criteria for inclusion within the AONB. In addition, it is noted that the Landscape Study has not been subject to peer review and there is no evidence that it has had stakeholder input / consultation with statutory consultees, such Natural England / High Weald AONB Joint Advisory Committee and other interested bodies to agree this approach to the AONBs. 7.2.24 The Study goes on to set out the method used to undertake a comparative evaluation of a potential development area within a character area which has capacity to accommodate development. This gives an early indication of sites which would be worthy of further consideration for development in landscape terms. We contend that the comparative assessment of character areas within the District is flawed as the starting point for the assessment the landscape sensitivity / capacity analysis is unsound for the reason given above. 7.2.25 Notwithstanding the above point, Section 2.15.4 of the Landscape Study states that: ‘Prior to coming to a firm view on the full potential and scope in these areas further investigation would be required’. 7.2.26 However, the Study does not present evidence of this further investigation or how preferred development areas have been chosen; for example there is no detailed assessment of the west of Uckfield area although this has been identified as a major urban extension area under Policy WCS4 - SD1. 7.3 Critical Review of the findings of the Landscape Study 7.3.1 The Landscape Study methodology sets out how each landscape character is to be assessed and the information recorded using landscape character assessment sheets (section 2.5) whilst section 2.17 of the Landscape Study refers to mapping which is split into two stages. Stage 1 relates to recording baseline information on each character area such as planning designation, Public Right of Way and key viewpoint, focal point, landscape features and detractors (which should be read with the assessment record sheets). Stage 2 relates to the identification of potential development areas with indicative boundaries and also identifies key woods, shaws, hedges, tree belts etc and also the potential for mitigation planting. 7.3.2 In order to assess the robustness of the landscape capacity study for the purpose of this representation, the area around Uckfield, Maresfield and Five Ash Down were visited and the baseline information recorded on the landscape assessment sheets checked and the judgements reached reviewed. This check revealed that that were a number of elements / features not recorded or identified for some areas and therefore these factors were not able to inform the judgement reached. 7.3.3 For example, ‘Maresfield Area A’, is described as: ‘An open, undulating landscape used for pasture to the west and pleasure to the east. It is ungrazed showing some scrub. Wide long views to the south. Surrounded on other sides by mature trees and exotic Eucalyptus and Cedars from nearby Park. Fine houses on outskirts and within site. Fine clumps of Pines. Some road noise adjoins picturesque recreation ground’. 7.3.4 The assessment sheet omits a number of important features such as areas of woodlands and plantations, (some of which are ancient woodlands and provide screening, containment and form visual barriers). Hedges, fences, footpaths and reference to the bypass were not recorded. The assessment sheet also refers to parkland and that the majority of the land is amenity land lacking management. A wide long view(s) out to
the south is highlighted as a key feature which is correct when looking south from a small part of the area but elsewhere views are contained and obscured by landform and vegetation. The record sheet includes a photograph of the view south but this is not taken from the recreation ground as recorded on the map Figure 52. The photograph was taken from private land on the footpath. 7.3.5 In the visual appraisal section of the assessment sheet it records the local receptors as amenity land and houses, types of view as long views from top of ridge to the south and visual barriers as landform / trees and hedges. It concludes that the sensitivity is high (see table 7.1 below). It is acknowledged that there are views within the area but these tend to be short partial or glimpsed views with long views out towards the south from high ground in the north eastern parts of character area. Views into the area are very limited and development within the area would have a minimal impact on views. However, in views from the ridge to the south the recreation occupying the north eastern parts of the character area is seen whilst the remaining areas are hidden from view and therefore the visual sensitivity of the majority of the area is low. 7.3.6 The resultant evaluation of this area was considered as follows: Table 7.1: Landscape Study Assessment, Maresfield Area A Character Area Maresfield A Quality Good Value Medium Sensitivity to Change Moderate Visual Sensitivity High Management Opportunities Mange hedges and grazing. Mange recreational spaces and access to countryside. Need to retain gap between Maresfield and Uckfield. Potential for Mitigation LowPlanting would change open character and obscure long views out from recreation ground Capacity to Accept Change: Housing LowClose to village edge only Capacity to Accept Change: Business Low 7.3.7 We contend that the record sheets are incorrect and the judgement on quality / condition is erroneous and should be ‘ordinary’ as most of the land is unmanaged comprising rank grassland of little intrinsic landscape value and the visual sensitivity of the area is ‘moderate or low’ due to the strong enclosure afforded to the area. It is interesting to note that one of the management opportunities is to retain a gap between Maresfield and Uckfield although there is no planning policy support for the retention of gaps in the Core Strategy or previous Non Statutory Wealden Local Plan. 7.3.8 By comparison, another example is Character Area L – land to the west of Uckfield, which is described as: ‘Land sloping away from urban edge to Uck valley and A26 Uckfield by pass. Strong field structure with arable and pasture. Some large fields. Sewage works detractors. Few focuses of character. Development would need a well defined edge to prevent creep’. 7.3.9 The assessment sheet for this character area has recorded the land cover and landscape elements correctly but has not recorded any landform features and relatively few aesthetic factors, although it describes the land as sloping away from the urban edge with a strong field structure with arable and pasture. The landscape condition is considered to be fair which is not defined in the methodology although this changes to ordinary in the comparison table. 7.3.10 In the visual appraisal section of the assessment sheet it records the local receptors as countryside on the other side of Uck Valley, isolated properties, footpaths and A26 and houses on the urban edge, types of view as views across to woods at West Park / Butchers Wood, wooded ridge of Shortbridge across Uckfield Valley and visual barriers as few. It concludes that the sensitivity is ‘moderate’ (see table 7.2). Table 7.2: Landscape Study Assessment, Uckfield Area L Character Area Uckfield L Quality Ordinary Value MediumSnawAccessible for recreational Sensitivity to Change Moderate Visual Sensitivity Moderate High on ridge Management Opportunities Mange urban fringe. Farm diversification pressure. Manage wood and existing trees and hedges Potential for Mitigation ModerateLow on ridge as need to retain open fields Soften urban edge. Create green network. Relocate recreation ground Capacity to Accept Change: Housing Moderate Need well defined boundaries close to urban edge avoid high ground Capacity to Accept Change: Business No capacity 7.3.11 We contend that the record sheets are incorrect and the judgement on quality / condition is under estimated and should be ‘good’ as most of the land is attractive farmed landscape with some distinctiveness features with a recognisable landscape structure. The assessment sheet ignores the open exposed nature of this character area, with long views south and west and numerous views in to the area from the surrounding countryside (roads and footpaths), and therefore the visual sensitivity of the area should be ‘high’ due the number of viewpoints where views can be obtained. This can be compared to the Maresfield A area which is considered to have ‘high’ sensitivity rating but with a few vantage points available where development impacts will be perceived. 7.3.12 We also note that under management opportunities it is considered that the area could contribute to managing the urban fringe, which could equally apply to the land at Maresfield, and that under the potential for mitigation heading is considered that the area has a ‘moderate’ ability, although the introduction of mitigate planting as shown Figure 11 of the landscape Study would dramatically and significantly change the landscape character of the area. 7.3.13 These examples illustrate the inconsistency of the landscape assessment record sheet and the arbitrary nature of the judgements made. 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**Details of Changes to be Made:**

SUMMARY 7.4.7 In conclusion, we contend that the Core Strategy is unsound because: 1. It is not justified as it is not based on a sound evidence base as the Landscape Study (Landscape Character Assessment and Development Options Evaluation Study of the District) is flawed and therefore the assessment of housing sites in the district, the spatial strategy and the Councils Sustainability Appraisal is unsound. It is not clear how the Landscape Study has been used to inform the spatial strategy as it is not specifically referred to in the Core Strategy nor is the Landscape Study listed as a background paper at paragraph 1.7 of the Core Strategy; 2. It is not justified because the Landscape Study as it is not robust, thorough, and transparent and that it does not form a credible evidence base suitable to inform the spatial strategy contained in the Core Strategy. The Landscape Study contains a number inconsistencies set out in the landscape assessment record sheets and contains a number of arbitrary judgements and so it does not give any confidence to the manner in which the Landscape Study has been undertaken or to the transparent way that the judgements have been reached 3. It is not consistent with national policy as the methodology for undertaking the Landscape Study (which has been used to inform the spatial strategy) refers to ‘AONB and AONB Buffer Zones’ as a way of identifying higher value landscapes. There are a number of reasons why this approach is unsound but there is no Government policy support for the concept of ‘AONB buffers’ in Planning Policy Statement No.7 or any other policy guidance.
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However, it is not clear how the Landscape Study has been used to inform the spatial strategy as it is not specifically referred to in the text of Core Strategy nor is the Landscape Study listed as a background paper at paragraph 1.7 of the Core Strategy (although it is included as a background paper on the Council’s website). 7.1.3 We have reviewed the methodology set out in the document and we have also reviewed whether the methodology has been consistently applied resulting in a final report that is robust, thorough and transparent and one that would form a credible evidence base suitable to inform the spatial strategy contained in the Core Strategy. 7.1.4 We contend that the Landscape Study is flawed and therefore the assessment of houses sites in the district, the spatial strategy and the Council’s Sustainability Appraisal, and thus the Core Strategy, is unsound. 7.1.5 Our representation is summarised below: Section of Core Strategy: Spatial Planning Objectives 1, 3 and 11, Paras 3.30 - 3.33. Policy WCS4 Strategic Development Areas, Figure 6 Uckfield Area Strategy, Paras 6.9 and 6.11. Policy WSC13 Green Infrastructure, Paras 7.23 - 7.28 Legally Compliant: -Sound: No Justified: No Effective: No Consistent with national policy: Proposed Submission Core Strategy Paragraphs 3.30 – 3.33 7.1.6 Paragraph 3.30 of the Proposed Submission Core Strategy refers to Wealden’s environmental attributes and that they have an important part to play in the development of the spatial strategy and ‘had a significant impact upon the assessment of the suitability of housing land in relation to the SHLAA’. 7.1.7 Paragraph 3.30 goes on to state that: ‘...and sites have been carefully scrutinised with regards to landscape impact.” 7.1.8 Paragraph 3.33 refers to Government guidance and the level of protection this provides for the environment, particularly nationally and internationally designated sites, which are not duplicated in the Core Strategy. The paragraph goes on to state: “However, our strategy has been guided by high levels of protection on local and national levels, and more detailed policies are contained within the Core Strategy and further ones in subsequent DPDs.” 7.1.9 Paragraph 1.7 in the Introduction to the Core Strategy refers to a number of specialist studies that have been produced to provide a robust evidence base to inform the Local Development Framework. The Landscape Study is not listed as a background paper at paragraph 1.7 of the Core Strategy (although it is included as a background paper on the Council’s website). Policy WCS4 Strategic Development Areas and Paragraphs 6.9 and 6.11 7.1.10 The Core Strategy proposes that the land to the west of Uckfield be identified as a ‘strategic development area’ suitable for accommodating 1,000 homes and some 12,650 sq metres of employment floor space and education provision as an extension to the urban area to the west of New Town. 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Inform the preparation of WDC Local Development Framework Core Strategy and; 2. Inform the development policies on landscape management and protection. 7.2.2 The Landscape Study states that it will: 1. Assess the existing landscape character of key search areas 2. Assess the quality and value of the existing landscape in these key search areas 3. Assess the sensitivity if the existing landscape and its capacity to accept change or having regard to the scope for mitigation 4. Make recommendations on preferred locations from a landscape perspective. 7.2.3 The Landscape Study purports to use a number of methodologies for the assessment and
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7.2.7 The review of the Core Strategy background paper indicates that the Landscape Study has not followed the guidance in Topic Paper No.6. Topic Paper No.6 suggests that there are two approaches to assessing landscape sensitivity. These are: 1. Judging Overall Landscape Sensitivity and; 2. Judging Landscape Sensitivity to a specific type of change. 7.2.8 However, in order to assess landscape capacity, the assessment of the sensitivity of different types or areas of landscape to the type of change in question must be combined with an assessment of the more subjective or perceptual aspects of the landscape and of the value attached to the landscape. 7.2.9 The stages for assessing landscape capacity of a landscape are set out in Section 3.0 of Topic Paper No.6 and reproduced in Figure 7.1 below. Figure 7.1: Stages for assessing landscape capacity Source: Landscape Character Assessment Guidance for England and Scotland, Topic Paper No.6: Techniques and criteria for Judging Capacity and Sensitivity (CA 2002) 7.2.10 Sections 5.0 and 6.0 of Topic Paper No.6 provide the more detailed considerations that need to be taken into account. 7.2.11 The boxed text, at paragraph 2.11.2 of the Landscape Study, follows the same assessment stages used to assess the landscape capacity to accommodate a specific type of change and given the local scale of the assessment work it is considered that this is the appropriate method to use. 7.2.12 However, Topic Paper No.6, at paragraph 6.5, also goes on to state that: ‘Capacity is all a question of the interaction between the sensitivity of the landscape, the type and amount of change and the way that the landscape is valued’. 7.2.13 Sections 2.11 and 2.12 of the Landscape Study set out the approach used by East Sussex County Council landscape group in undertaking the landscape study. However, the assessment does not define the quantum of housing development used to assess the capacity of each character area, nor is the LDF Core Issues and Options Consultation Paper July 2007 referred to as a guide to the quantum of housing development used to assess each of the different character areas. The Landscape Study does however state at paragraph 2.12.3 that: ‘an overall assessment can be made for each character area on the capacity to accept the type of change being considered. This judgement is made according to the combination of characteristics that contribute to a particular area of landscape. The capacity of an area to accept change is related to the potential of the area to accommodate development in a particular location without detracting from the overall character of that landscape. The capacity evaluation of each character area does not assume that this is the capacity across the entire character area’ 7.2.14 There are a number interrelated issues raised in the above paragraph which we now turn to. 7.2.15 In relation to the type of change, the Landscape Study defines, at paragraph 2.12.6, the assumptions used for the assessment business uses, i.e. the assessment of sensitivity / capacity is based on light industrial type uses which would be consistent with a residential environment and these would be single storey units. However the Landscape Study does not define the full details of the housing use, such as type (housing - single storey / two storey / three storey etc) or amount (large / medium / small scale development) and we contend that the details of the change being considered is not transparent from the Landscape Study, as although the type of change (i.e. housing) is known, the form and amount of housing is unknown. These are important factors when considering the landscape capacity of an area to accommodate development, especially if using the stages set in the Landscape Study. 7.2.16 A similar assumption to the business use (or range of assumptions) could have been used for assessing the impact of housing on landscape sensitivity / capacity of each character area. For example two to three storey houses at the following ranges: 1. small scale housing between five to 50 dwellings 2. medium scale housing development between 50 to 200 dwellings, and 3. large scale housing development between 200 to 500 dwellings. 7.2.17 In relation to the combination of the characteristics that contribute to a particular area, comments on these are made in later sections (See paragraphs 7.4.1 to 7.4.14 below). 7.2.18 The Landscape Study also refers to mitigation and management of the landscape (Section 2.13) and, in paragraph 2.13.1, it highlights that mitigation has been used to determine the visual and character sensitivity of the landscape. This approach does not accord with Topic Paper No.6 as mitigation should only be used to inform the visual sensitivity of the area assessed, (See Figure 7.1 above), and not directly the character sensitivity of an area (although visual aspects are one of the aspects that inform the character of an area). Mitigation in itself can have a significant effect on character and the landscapes capacity to accommodate development. In some cases mitigation would make an area less suitable to accommodate development not more suitable. Again this, we would contend, is a flaw in the assessment. The existing management of the landscape is relevant to determining the condition (or quality) of an area of landscape but the identification of management opportunities is not relevant to determining the capacity of the landscape to
accommodate development. Management of the land could in itself bring about a change to the landscape which is discordant with its character, for instance managing the land to encourage woodland growth or planting extensive woodlands in a very open exposed landscape would lead to a significant change. 7.2.19 The methodology section of the Landscape Study also includes a part dealing with the Areas of Outstanding Natural Beauty (AONB) within the district. Section 2.14 refers to ‘AONBs and AONB Buffer Zones’ as a way of identifying higher value landscapes within Wealden. At paragraph 2.14.2 the Landscape Study states: ‘There is, in some areas adjacent to the AONB boundary a buffer zone to the AONB landscape. This is usually an area of similar character but not of the same quality as the AONB landscape and not covered by the same planning policy. Where relevant these areas are indicated in the figures’. 7.2.20 Paragraph 2.14.4, the Landscape Study goes on the state the following: ‘These buffer zones have been identified through the character area analysis. The relative sensitivity of these areas has been considered according to the landscape character to achieve a balanced comparison with AONBs and AONB landscapes’. 7.2.21 The Landscape Study considers that there is support for this ‘buffer zone’ approach due to Policy EN2 (f) of the East Sussex and Brighton and Hove Structure Plan. We contend that this approach is flawed and unsound. Firstly, the Structure Plan has been superseded by the South East Plan and at the time of preparing the Landscape Study during the period August 2007 to February 2009, both East Sussex County Council and Wealden District Council would have been aware of the emerging South East Plan policies through the draft regional plan. Secondly, Policy EN2 (f) does not prohibit development but seeks to protect the Sussex Downs and High Weald AONBs and minimise the impact of development within them by requiring measures to integrate the development in to the landscape. Thirdly, there is no Government policy support for the concept of ‘AONB buffer’ areas within the Structure Plan in the South East Plan. 7.2.22 The fourth point is that, whilst the Council would seek support from Policy EN2 (f) as a way of ‘balancing the comparison between AONB and non AONB areas’ especially the areas of landscape close to the AONB boundary, the East Sussex and Brighton and Hove Structure Plan does not define the extent of the buffer zone on the Key Diagram nor is the extent of the buffer area set out in its explanatory text. We contend that the justification for this approach must be given very little weight. 7.2.23 Lastly, it is acknowledged that some areas of landscape within an AONB may be of poorer condition (quality) score and / or lower visual and character sensitivity than areas outside of the AONB but the adjustment in the landscape sensitivity / capacity scoring by introducing what appears to be an arbitrary AONB buffer zone seems to undermine the purposes and status of the AONB designation,(and its planning policy protection), by attaching increased value to a character area that adjoins the AONB which although it may be of a similar character, does not meet the quality criteria for inclusion within the AONB. In addition, it is noted that the Landscape Study has not been subject to peer review and there is no evidence that it has had stakeholder input / consultation with statutory consultees, such Natural England / High Weald AONB Joint Advisory Committee and other interested bodies to agree this approach to the AONBs. 7.2.24 The Study goes on to set out the method used to undertake a comparative evaluation of a potential development area within a character area which has capacity to accommodate development. This gives an early indication of sites which would be worthy of further consideration for development in landscape terms. We contend that the comparative assessment of character areas within the District is flawed as the starting point for the assessment the landscape sensitivity / capacity analysis is unsound for the reason given above. 7.2.25 Notwithstanding the above point, Section 2.15.4 of the Landscape Study states that: ‘Prior to coming to a firm view on the full potential and scope in these areas further investigation would be required’. 7.2.26 However, the Study does not present evidence of this further investigation or how preferred development areas have been chosen; for example there is no detailed assessment of the west of Uckfield area although this has been identified as a major urban extension area under Policy WCS4 - SD1. 7.3 Critical Review of the findings of the Landscape Study 7.3.1 The Landscape Study methodology sets out how each landscape character is to be assessed and the information recorded using landscape character assessment sheets (section 2.5) whilst section 2.17 of the Landscape Study refers to mapping which is split into two stages. Stage 1 relates to recording baseline information on each character area such as planning designation, Public Right of Way and key viewpoint, focal point, landscape features and detractors (which should be read with the assessment record sheets). Stage 2 relates to the identification of potential development areas with indicative boundaries and also identifies key woods, shaws, hedges, tree belts etc and also the potential for mitigation planting. 7.3.2 In order to assess the robustness of the landscape capacity study for the purpose of this representation, the area around Uckfield, Maresfield and Five Ash Down were visited and the baseline information recorded on the landscape assessment sheets checked and the judgements reached reviewed. This check revealed that that were a number of elements / features not recorded or identified for some areas and therefore these factors were not able to inform the judgement reached. 7.3.3 For example, ‘Maresfield Area A’, is described as: ‘An open, undulating landscape used for pasture to the west and pleasure to the east. It is ungrazed showing some scrub. Wide long views to the south. Surrounded on other sides by mature trees and exotic Eucalyptus and Cedars from nearby Park. Fine houses on outskirts and within site. Fine clumps of Pines. Some road noise adjoins picturesque recreation ground’. 7.3.4 The assessment sheet omits a number of important features such as areas of woodlands and plantations, (some of which are ancient woodlands and provide screening, containment and form visual barriers). Hedges, fences, footpaths and reference to the bypass were not recorded. The assessment sheet also refers to parkland and that the majority of the land is amenity land lacking management. A wide long view(s) out to
the south is highlighted as a key feature which is correct when looking south from a small part of the area but
elsewhere views are contained and obscured by landform and vegetation. The record sheet includes a photograph
of the view south but this is not taken from the recreation ground as recorded on the map Figure 52. The
photograph was taken from private land on the footpath. 7.3.5 In the visual appraisal section of the assessment
sheet it records the local receptors as amenity land and houses, types of view as long views from top of ridge to
the south and visual barriers as landform / trees and hedges. It concludes that the sensitivity is high (see table 7.1
below). It is acknowledged that there are views within the area but these tend to be short partial or glimpsed views
with long views out towards the south from high ground in the north eastern parts of character area. Views into the
area are very limited and development within the area would have a minimal impact on views. However, in views
from the ridge to the south the recreation occupying the north eastern parts of the character area is seen whilst the
remaining areas are hidden from view and therefore the visual sensitivity of the majority of the area is low. 7.3.6
The resultant evaluation of this area was considered as follows: Table 7.1: Landscape Study Assessment,
Maresfield Area A Character Area Maresfield A Quality Good Value Medium Sensitivity to Change Moderate
Visual Sensitivity High Management Opportunities Mange hedges and grazing. Mange recreational spaces and
access to countryside. Need to retain gap between Maresfield and Uckfield. Potential for Mitigation Low
PLanting would change open character and obscure long views out from recreation ground Capacity to Accept Change:
Housing Low Close to village edge only Capacity to Accept Change: Business Low 7.3.7 We contend that the
record sheets are incorrect and the judgement on quality / condition is erroneous and should be ‘ordinary’ as most
of the land is unmanaged comprising rank grassland of little intrinsic landscape value and the visual sensitivity of
the area is ‘moderate or low’ due to the strong enclosure afforded to the area. It is interesting to note that one of
the management opportunities is to retain a gap between Maresfield and Uckfield although there is no planning
policy support for the retention of gaps in the Core Strategy or previous Non Statutory Wealden Local Plan. 7.3.8
By comparison, another example is Character Area L – land to the west of Uckfield, which is described as: ‘Land
sloping away from urban edge to Uck valley and A26 Uckfield by pass. Strong field structure with arable and
pasture. Some large fields. Sewage works detractors. Few focuses of character. Development would need a well
declared edge to prevent creep’. 7.3.9 The assessment sheet for this character area has recorded the land cover
and landscape elements correctly but has not recorded any landform features and relatively few aesthetic factors,
although it describes the land as sloping away from the urban edge with a strong field structure with arable and
pasture. The landscape condition is considered to be fair which is not defined in the methodology although this
changes to ordinary in the comparison table. 7.3.10 In the visual appraisal section of the assessment sheet it
records the local receptors as countryside on the other side of Uck Valley, isolated properties, footpaths and A26
and houses on the urban edge, types of view as views across to woods at West Park / Butchers Wood, wooded
ridge of Shortbridge across Uckfield Valley and visual barriers as few. It concludes that the sensitivity is ‘moderate’
(see table 7.2). Table 7.2: Landscape Study Assessment, Uckfield Area L Character Area Uckfield L Quality
Ordinary Value Medium Snaw Accessible for recreational Sensitivity to Change Moderate Visual Sensitivity Moderate
High on ridge Management Opportunities Mange urban fringe. Farm diversification pressure. Manage woodland
and existing trees and hedges Potential for Mitigation Moderate. Low on ridge as need to retain open fields Soften
urban edge. Create green network. Relocate recreation ground Capacity to Accept Change: Housing Moderate
Need well defined boundaries close to urban edge avoid high ground Capacity to Accept Change: Business No capacity
7.3.11 We contend that the record sheets are incorrect and the judgement on quality / condition is under estimated
and should be ‘good’ as most of the land is attractive farmed landscape with some distinctiveness features with a
recognisable landscape structure. The assessment sheet ignores the open exposed nature of this character area,
with long views south and west and numerous views in to the area from the surrounding countryside (roads and
footpaths), and therefore the visual sensitivity of the area should be ‘high’ due the number of viewpoints where
views can be obtained. This can be compared to the Maresfield A area which is considered to have ‘high’
sensitivity rating but with a few vantage points available where development impacts will be perceived. 7.3.12 We
also note that under management opportunities it is considered that the area could contribute to managing the
urban fringe, which could equally apply to the land at Maresfield, and that under the potential for mitigation heading
is considered that the area has a ‘moderate’ ability, although the introduction of mitigate planting as shown Figure
11 of the landscape Study would dramatically and significantly change the landscape character of the area. 7.3.13
These examples illustrate the inconsistency of the landscape assessment record sheet and the arbitrary nature of
the judgements made. It does not give any confidence to the manner in which the Landscape Study has been
undertaken or to the transparent way that the judgements have been reached. 7.4 Implications for the soundness
of the Core Strategy 7.4.1 We have reviewed the ‘Landscape Character Assessment and Development Option
Evaluation Study’ of the district. It is not clear how this Landscape Study has been used to inform the spatial
strategy as it is not specifically referred to in the Core Strategy, nor is the Landscape Study listed as a background
paper at paragraph 1.7 of the Core Strategy (although it is included as a background paper on the Councils
website). 7.4.2 We have reviewed the methodology set out in the document and we have also reviewed whether
the methodology has been consistently applied resulting in a final report that is robust, thorough, and transparent
and that it would form a credible evidence base suitable to inform the spatial strategy contained in the Core
Strategy. The Study also includes a methodology employed to undertake a comparative evaluation of a potential
development area within a character area which has capacity to accommodate development. 7.4.3 The examples
referred to in our analysis above illustrate the inconsistency of the landscape assessment record sheets and
arbitrary nature of the judgements made and it does not give any confidence to the manner in which the
Landscape Study has been undertaken or to the transparent way that the judgements have been reached. 7.4.4 We contend that the Landscape Study is flawed and therefore the assessment of housing sites in the district, the spatial strategy and the Council’s Sustainability Appraisal is unsound. In addition, in relation to the comparison assessment of sites within the district surrounding the towns and villages; we contend that this comparative assessment of character areas is flawed as the starting point for the assessment the landscape sensitivity / capacity analysis is unsound for the reason given above. 7.4.5 The Core Strategy proposes that the land to the west of Uckfield be identified as a ‘strategic development area’ suitable for accommodating 1,000 homes and some 12,650 sq metres net of employment floor space and education provision as an extension to the urban area to the west of New Town. In the light of the comments made on the Landscape Study, it is considered that this proposal be reassessed and, (taking into account the other representations made on other parts and policies contained in the Core Strategy), greater emphasis be given to the suitability of land at Maresfield to accommodate increased housing numbers and a larger proportion of the housing requirements for the district. 7.4.6 Policy WSC13 relating to Green Infrastructure is supported although it is considered that the anomalies and errors in the Landscape Study be addressed before this document is used to inform and guide the implementation of Green Infrastructure Strategy and also formulation of the specific measures for the protection and enhancement of the landscape which are to set out in the Delivery and Site Allocations DPD referred to at paragraph 7.28 of the Core Strategy.

Details of Changes to be Made:
SUMMARY 7.4.7 In conclusion, we contend that the Core Strategy is unsound because: 1. It is not justified as it is not based on a sound evidence base as the Landscape Study (Landscape Character Assessment and Development Options Evaluation Study of the District) is flawed and therefore the assessment of housing sites in the district, the spatial strategy and the Council’s Sustainability Appraisal is unsound. It is not clear how the Landscape Study has been used to inform the spatial strategy as it is not specifically referred to in the Core Strategy nor is the Landscape Study listed as a background paper at paragraph 1.7 of the Core Strategy; 2. It is not justified because the Landscape Study as it is not robust, thorough, and transparent and that it does not form a credible evidence base suitable to inform the spatial strategy contained in the Core Strategy. The Landscape Study contains a number inconsistencies set out in the landscape assessment record sheets and contains a number of arbitrary judgements and so it does not give any confidence to the manner in which the Landscape Study has been undertaken or to the transparent way that the judgements have been reached. 3. It is not consistent with national policy as the methodology for undertaking the Landscape Study (which has been used to inform the spatial strategy) refers to ‘AONB and AONB Buffer Zones’ as a way of identifying higher value landscapes. There are a number of reasons why this approach is unsound but there is no Government policy support for the concept of ‘AONB buffers’ in Planning Policy Statement No.7 or any other policy guidance.
7.1.1 In this section of the report we present our representations in regard to landscape matters in and informing the Core Strategy. Our representation is made in regard to paragraphs 3.30 – 3.33 of the submission Core Strategy, Policies WC4 and WC13 and supporting background papers. 7.1.2 For the purposes of this representation we have reviewed the ‘Landscape Character Assessment and Development Option Evaluation Study’ undertaken for the district (referred hereinafter as the ‘Landscape Study’), which is included as a background paper to the Core Strategy on the Councils website. However, it is not clear how the Landscape Study has been used to inform the spatial strategy as it is not specifically referred to in the text of Core Strategy nor is the Landscape Study listed as a background paper at paragraph 1.7 of the Core Strategy (although it is included as a background paper on the Councils website). Paragraph 6.9 refers to the SHLAA and assessment of the potential sites at the fringes of the urban area. 7.1.3 We have reviewed the methodology set out in the document and we have also reviewed whether the methodology has been consistently applied resulting in a final report that is robust, thorough and transparent and one that would form a credible evidence base suitable to inform the spatial strategy contained in the Core Strategy. 7.1.4 We contend that the Landscape Study is flawed and therefore the assessment of housing sites in the district, the spatial strategy and the Councils Sustainability Appraisal, and thus the Core Strategy, is unsound. 7.1.5 Our representation is summarised below: Section of Core Strategy: Spatial Planning Objectives 1, 3 and 11, Paras 3.30 - 3.33, Policy WCS4 Strategic Development Areas, Figure 6 Uckfield Area Strategy, Paras 6.9 and 6.11, Policy WSC13 Green Infrastructure, Paras 7.23 - 7.28Legally Compliant: -Sound: NoJustified: NoEffective: -Consistent with national policy: No Proposed Submission Core Strategy Paragraphs 3.30 – 3.33 7.1.6 Paragraph 3.30 of the Proposed Submission Core Strategy refers to Wealden’s environmental attributes and that they have an important part to play in the development of the spatial strategy and ‘had a significant impact upon the assessment of the suitability of housing land in relation to the SHLAA’. 7.1.7 Paragraph 3.30 goes on to state that: “...and sites have been carefully scrutinised with regards to landscape impact.” 7.1.8 Paragraph 3.33 refers to Government guidance and the level of protection this provides for the environment, particularly nationally and internationally designated sites, which are not duplicated in the Core Strategy. 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The capacity evaluation of each character area does not assume that this is the capacity across the entire character area’ 7.2.14 There are a number interrelated issues raised in the above paragraph which we now turn to. 7.2.15 In relation to the type of change, the Landscape Study defines, at paragraph 2.12.6, the assumptions used for the assessment business uses, i.e. the assessment of sensitivity / capacity is based on light industrial type uses which would be consistent with a residential environment and these would be single storey units. However the Landscape Study does not define the full details of the housing use, such as type (housing - single storey / two storey / three storey etc) or amount (large / medium / small scale development) and we contend that the details of the change being considered is not transparent from the Landscape Study, as although the type of change (i.e. housing) is known, the form and amount of housing is unknown. 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Mitigation in itself can have a significant effect on character and the landscapes capacity to accommodate development. In some cases mitigation would make an area less suitable to accommodate development not more suitable. Again this, we would contend, is a flaw in the assessment. The existing management of the landscape is relevant to determining the condition (or quality) of an area of landscape but the identification of management opportunities is not relevant to determining the capacity of the landscape to
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In addition, it is noted that the Landscape Study has not been subject to peer review and there is no evidence that it has had stakeholder input / consultation with statutory consultees, such Natural England / High Weald AONB Joint Advisory Committee and other interested bodies to agree this approach to the AONBs. 7.2.24 The Study goes on to set out the method used to undertake a comparative evaluation of a potential development area within a character area which has capacity to accommodate development. This gives an early indication of sites which would be worthy of further consideration for development in landscape terms. We contend that the comparative assessment of character areas within the District is flawed as the starting point for the assessment the landscape sensitivity / capacity analysis is unsound for the reason given above. 7.2.25 Notwithstanding the above point, Section 2.15.4 of the Landscape Study states that: ‘Prior to coming to a firm view on the full potential and scope in these areas further investigation would be required’. 7.2.26 However, the Study does not present evidence of this further investigation or how preferred development areas have been chosen; for example there is no detailed assessment of the west of Uckfield area although this has been identified as a major urban extension area under Policy WCS4 - SD1. 7.3 Critical Review of the findings of the Landscape Study 7.3.1 The Landscape Study methodology sets out how each landscape character is to be assessed and the information recorded using landscape character assessment sheets (section 2.5) whilst section 2.17 of the Landscape Study refers to mapping which is split into two stages. Stage 1 relates to recording baseline information on each character area such as planning designation, Public Right of Way and key viewpoint, focal point, landscape features and detractors (which should be read with the assessment record sheets). Stage 2 relates to the identification of potential development areas with indicative boundaries and also identifies key woods, shaws, hedges, tree belts etc and also the potential for mitigation planting. 7.3.2 In order to assess the robustness of the landscape capacity study for the purpose of this representation, the area around Uckfield, Maresfield and Five Ash Down were visited and the baseline information recorded on the landscape assessment sheets checked and the judgements reached reviewed. This check revealed that that were a number of elements / features not recorded or identified for some areas and therefore these factors were not able to inform the judgement reached. 7.3.3 For example, ‘Maresfield Area A’, is described as: ‘An open, undulating landscape used for pasture to the west and pleasure to the east. It is ungrazed showing some scrub. Wide long views to the south. Surrounded on other sides by mature trees and exotic Eucalyptus and Cedars from nearby Park. Fine houses on outskirts and within site. Fine clumps of Pines. Some road noise adjoins picturesque recreation ground’. 7.3.4 The assessment sheet omits a number of important features such as areas of woodlands and plantations, (some of which are ancient woodlands and provide screening, containment and form visual barriers). Hedges, fences, footpaths and reference to the bypass were not recorded. The assessment sheet also refers to parkland and that the majority of the land is amenity land lacking management. A wide long view(s) out to
the south is highlighted as a key feature which is correct when looking south from a small part of the area but elsewhere views are contained and obscured by landform and vegetation. The record sheet includes a photograph of the view south but this is not taken from the recreation ground as recorded on the map Figure 52. The photograph was taken from private land on the footpath. 7.3.5 In the visual appraisal section of the assessment sheet it records the local receptors as amenity land and houses, types of view as long views from top of ridge to the south and visual barriers as landform / trees and hedges. It concludes that the sensitivity is high (see table 7.1 below). It is acknowledged that there are views within the area but these tend to be short partial or glimpsed views with long views out towards the south from high ground in the north eastern parts of character area. Views into the area are very limited and development within the area would have a minimal impact on views. However, in views from the ridge to the south the recreation occupying the north eastern parts of the character area is seen whilst the remaining areas are hidden from view and therefore the visual sensitivity of the majority of the area is low. 7.3.6 The resultant evaluation of this area was considered as follows: Table 7.1: Landscape Study Assessment, Maresfield Area A Character Area Maresfield A Quality Good Value Medium Sensitivity to Change Moderate Visual Sensitivity High Management Opportunities Mange hedges and grazing. Mange recreational spaces and access to countryside. Need to retain gap between Maresfield and Uckfield. Potential for Mitigation LowPlanting would change open character and obscure long views out from recreation ground Capacity to Accept Change: Housing LowClose to village edge only Capacity to Accept Change: Business Low 7.3.7 We contend that the record sheets are incorrect and the judgement on quality / condition is erroneous and should be ‘ordinary’ as most of the land is unmanaged comprising rank grassland of little intrinsic landscape value and the visual sensitivity of the area is ‘moderate or low’ due to the strong enclosure afforded to the area. It is interesting to note that one of the management opportunities is to retain a gap between Maresfield and Uckfield although there is no planning policy support for the retention of gaps in the Core Strategy or previous Non Statutory Wealden Local Plan. 7.3.8 By comparison, another example is Character Area L – land to the west of Uckfield, which is described as: ‘Land sloping away from urban edge to Uck valley and A26 Uckfield by pass. Strong field structure with arable and pasture. Some large fields. Sewage works detractors. Few focuses of character. Development would need a well defined edge to prevent creep’. 7.3.9 The assessment sheet for this character area has recorded the land cover and landscape elements correctly but has not recorded any landform features and relatively few aesthetic factors, although it describes the land as sloping away from the urban edge with a strong field structure with arable and pasture. The landscape condition is considered to be fair which is not defined in the methodology although this changes to ordinary in the comparison table. 7.3.10 In the visual appraisal section of the assessment sheet it records the local receptors as countryside on the other side of Uck Valley, isolated properties, footpaths and A26 and houses on the urban edge, types of view as views across to woods at West Park / Butchers Wood, wooded ridge of Shortbridge across Uckfield Valley and visual barriers as few. It concludes that the sensitivity is ‘moderate’ (see table 7.2). Table 7.2: Landscape Study Assessment, Uckfield Area L Character Area Uckfield L Quality Ordinary Value Medium Snap Accessible for recreation Sensitivity to Change High on ridge Management Opportunities Mange urban fringe. Farm diversification pressure. Manage wood and existing trees and hedges Potential for Mitigation Moderate Low on ridge as need to retain open fields Soften urban edge. Create green network. Relocate recreation ground. Capacity to Accept Change: Housing Moderate Need well defined boundaries close to urban edge avoid high ground Capacity to Accept Change: Business No capacity 7.3.11 We contend that the record sheets are incorrect and the judgement on quality / condition is under estimated and should be ‘good’ as most of the land is attractive farmed landscape with some distinctiveness features with a recognisable landscape structure. The assessment sheet ignores the open exposed nature of this character area, with long views south and west and numerous views in to the area from the surrounding countryside (roads and footpaths), and therefore the visual sensitivity of the area should be ‘high’ due the number of viewpoints where views can be obtained. This can be compared to the Maresfield A area which is considered to have ‘high’ sensitivity rating but with a few vantage points available where development impacts will be perceived. 7.3.12 We also note that under management opportunities it is considered that the area could contribute to managing the urban fringe, which could equally apply to the land at Maresfield, and that under the potential for mitigation heading is considered that the area has a ‘moderate’ ability, although the introduction of mitigate planting as shown Figure 11 of the landscape Study would dramatically and significantly change the landscape character of the area. 7.3.13 These examples illustrate the inconsistency of the landscape assessment record sheet and the arbitrary nature of the judgements made. It does not give any confidence to the manner in which the Landscape Study has been undertaken or to the transparent way that the judgements have been reached. 7.4 Implications for the soundness of the Core Strategy 7.4.1 We have reviewed the ‘Landscape Character Assessment and Development Option Evaluation Study’ of the district. It is not clear how this Landscape Study has been used to inform the spatial strategy as it is not specifically referred to in the Core Strategy, nor is the Landscape Study listed as a background paper at paragraph 1.7 of the Core Strategy (although it is included as a background paper on the Councils website). 7.4.2 We have reviewed the methodology set out in the document and we have also reviewed whether the methodology has been consistently applied resulting in a final report that is robust, thorough, and transparent and that it would form a credible evidence base suitable to inform the spatial strategy contained in the Core Strategy. The Study also includes a methodology employed to undertake a comparative evaluation of a potential development area within a character area which has capacity to accommodate development. 7.4.3 The examples referred to in our analysis above illustrate the inconsistency of the landscape assessment record sheets and arbitrary nature of the judgements made and it does not give any confidence to the manner in which the
Landscape Study has been undertaken or to the transparent way that the judgements have been reached. 7.4.4 We contend that the Landscape Study is flawed and therefore the assessment of housing sites in the district, the spatial strategy and the Councils Sustainability Appraisal is unsound. In addition, in relation to the comparison assessment of sites within the district surrounding the towns and villages; we contend that this comparative assessment of character areas is flawed as the starting point for the assessment the landscape sensitivity/capacity analysis is unsound for the reason given above. 7.4.5 The Core Strategy proposes that the land to the west of Uckfield be identified as a ‘strategic development area’ suitable for accommodating 1,000 homes and some 12,650 sq metres net of employment floor space and education provision as an extension to the urban area to the west of New Town. In the light of the comments made on the Landscape Study, it is considered that this proposal be reassessed and, (taking into account the other representations made on other parts and policies contained in the Core Strategy), greater emphasis be given to the suitability of land at Maresfield to accommodate increased housing numbers and a larger proportion of the housing requirements for the district. 7.4.6 Policy WSC13 relating to Green Infrastructure is supported although it is considered that the anomalies and errors in the Landscape Study be addressed before this document is used to inform and guide the implementation of Green Infrastructure Strategy and also formulation of the specific measures for the protection and enhancement of the landscape which are to set out in the Delivery and Site Allocations DPD referred to at paragraph 7.28 of the Core Strategy.

Details of Changes to be Made:

SUMMARY 7.4.7 In conclusion, we contend that the Core Strategy is unsound because: 1. It is not justified as it is not based on a sound evidence base as the Landscape Study (Landscape Character Assessment and Development Options Evaluation Study of the District) is flawed and therefore the assessment of housing sites in the district, the spatial strategy and the Councils Sustainability Appraisal is unsound. It is not clear how the Landscape Study has been used to inform the spatial strategy as it is not specifically referred to in the Core Strategy nor is the Landscape Study listed as a background paper at paragraph 1.7 of the Core Strategy; 2. It is not justified because the Landscape Study as it is not robust, thorough, and transparent and that it does not form a credible evidence base suitable to inform the spatial strategy contained in the Core Strategy. The Landscape Study contains a number inconsistencies set out in the landscape assessment record sheets and contains a number of arbitrary judgements and so it does not give any confidence to the manner in which the Landscape Study has been undertaken or to the transparent way that the judgements have been reached. 3. It is not consistent with national policy as the methodology for undertaking the Landscape Study (which has been used to inform the spatial strategy) refers to ‘AONB and AONB Buffer Zones’ as a way of identifying higher value landscapes. There are a number of reasons why this approach is unsound but there is no Government policy support for the concept of ‘AONB buffers’ in Planning Policy Statement No.7 or any other policy guidance.

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7 Landscape 7.1 Introduction 7.1.1 In this section of the report we present our representations in regard to landscape matters in and informing the Core Strategy. Our representation is made in regard to paragraphs 3.30 – 3.33 of the submission Core Strategy, Policies WC4 and WC13 and supporting background papers. 7.1.2 For the purposes of this representation we have reviewed the ‘Landscape Character Assessment and Development Option Evaluation Study’ undertaken for the district (referred hereinafter as the ‘Landscape Study’), which is included as a background paper to the Core Strategy on the Councils website. However, it is not clear how the Landscape Study has been used to inform the spatial strategy as it is not specifically referred to in the text of Core Strategy nor is the Landscape Study listed as a background paper at paragraph 1.7 of the Core Strategy (although it is included as a background paper on the Councils website). 7.1.3 We have reviewed the methodology set out in the document and we have also reviewed whether the methodology has been consistently applied resulting in a final report that is robust, thorough and transparent and one that would form a credible evidence base suitable to inform the spatial strategy contained in the Core Strategy. 7.1.4 We contend that the Landscape Study is flawed and therefore the assessment of housing sites in the district, the spatial strategy and the Councils Sustainability Appraisal, and thus the Core Strategy, is unsound. 7.1.5 Our representation is summarised below: Section of Core Strategy: Spatial Planning Objectives 1, 3 and 11, Paras 3.30 - 3.33, Policy WCS4 Strategic Development Areas, Framework. The Landscape Study is not listed as a background paper at paragraph 1.7 of the Core Strategy (although it is included as a background paper on the Councils website). 7.1.6 Paragraph 3.30 of the Proposed Submission Core Strategy refers to "Landscape Character Assessment and Development Option Evaluation Study” and sites have been carefully scrutinised with regards to "...and sites have been carefully scrutinised with regards to landscape impact.” 7.1.7 Paragraph 3.31 goes on to state that: “...and sites have been carefully scrutinised with regards to landscape impact.” 7.1.8 Paragraph 3.33 refers to Government guidance and the level of protection this provides for the environment, particularly nationally and internationally designated sites, which are not duplicated in the Core Strategy. The paragraph goes on to state: “However, our strategy has been guided by high levels of protection on local and national levels, and more detailed policies are contained within the Core Strategy and further ones in subsequent DPDs.” 7.1.9 Paragraph 1.7 in the Introduction to the Core Strategy refers to a number of specialist studies that have been produced to provide a robust evidence base to inform the Local Development Framework. The Landscape Study is not listed as a background paper at paragraph 1.7 of the Core Strategy (although it is included as a background paper on the Councils website). 7.1.10 The Core Strategy proposes that the land to the west of Uckfield be identified as a ‘strategic development area’ suitable for accommodating 1,000 homes and some 12,650 sq metres net of employment floor space and education provision as an extension to the urban area to the west of New Town. 7.1.11 In the light of the comments that follow in this section of our representations on the Landscape Study, it considered that this proposal be reassessed and, taking into account other representations made on other parts and policies contained in the Core Strategy, greater emphasis should be given to the suitability of land at Maresfield to accommodate increased housing numbers and a larger proportion of the housing requirements for the district. Policy WSC13 Green Infrastructure, Paragraphs 7.23 - 7.28 and Background Paper BP6 7.1.12 Policy WSC13 and paragraph 7.23 to 7.28 relating to Green Infrastructure is supported although it is considered that the anomalies and errors in the Landscape Study be addressed before this document is used to inform and guide the implementation of Green Infrastructure Strategy and also formulation of the specific measures for the protection and enhancement of the landscape which are to set out in the Delivery and Site Allocations DPD referred to at paragraph 7.28 of the Core Strategy. 7.1.13 It is not clear from reading the Core Strategy, how the Landscape Study has been used to inform the above policies. 7.2 Consideration of the Methodology employed in the Landscape Study 7.2.1 Wealden Council commissioned the Landscape Study from the Landscape Group at East Sussex County Council, in September 2007. It was published in February 2009. The purpose of the Study is to: 1. Inform the preparation of WDC Local Development Framework Core Strategy and; 2. Inform the development policies on landscape management and protection. 7.2.2 The Landscape Study states that it will: 1. Assess the existing landscape character of key search areas 2. Assess the quality and value of the existing landscape in these key search areas 3. Assess the sensitivity if the existing landscape and its capacity to accept change or having regard to the scope for mitigation 4. Make recommendations on preferred locations from a landscape perspective. 7.2.3 The Landscape Study purports to use a number of methodologies for the assessment and...
identifies these as being: 1. For Landscape Character/ Quality and Value - Design Manual for Roads and Bridges Vol 11, section 3, Part 5 (DT) which has been further refined by the Landscape Character Assessment Guidance for England and Scotland (CA/SNH 2002) and; 2. For landscape sensitivity – Landscape Character Assessment Guidance for England and Scotland, Topic Paper No.6: Techniques and criteria for Judging Capacity and Sensitivity (CA 2002). 7.2.4 The Landscape Study sets out, in section 2.0, the methodology and criteria used for each aspect of the landscape being assessed, including the following: 1. Landscape Quality (this should be ‘condition’ if following latest LCA guidance as the term quality is now a discredited approach to assessing landscapes) 2. Landscape Value 3. Landscape Sensitivity 4. Visual Sensitivity 5. Landscape Capacity 7.2.5 In relation to the assessment of landscape capacity, capacity is defined in Topic Paper No.6: ‘Techniques and Criteria for Judging Capacity and Sensitivity’ as: ‘The degree to which a particular landscape type or area is able to accommodate change without significant effect on its character, or overall change of landscape character type. Capacity is likely to vary according to the type and nature of change being proposed’. 7.2.6 We have reviewed the Landscape Study, in particular, the methodology set out in the document and whether this has been consistently applied to form a credible evidence base suitable to inform the spatial strategy contained in the Core Strategy. 7.2.7 The review of the Core Strategy background paper indicates that the Landscape Study has not followed the guidance in Topic Paper No.6. Topic Paper No.6 suggests that there are two approaches to assessing landscape sensitivity. These are: 1. Judging Overall Landscape Sensitivity and; 2. Judging Landscape Sensitivity to a specific type of change. 7.2.8 However, in order to assess landscape capacity, the assessment of the sensitivity of different types or areas of landscape to the type of change in question must be combined with an assessment of the more subjective or perceptual aspects of the landscape and of the value attached to the landscape. 7.2.9 The stages for assessing landscape capacity of a landscape are set out in Section 3.0 of Topic Paper No.6 and reproduced in Figure 7.1 below. Figure 7.1: Stages for assessing landscape capacity Source: Landscape Character Assessment Guidance for England and Scotland, Topic Paper No.6: Techniques and criteria for Judging Capacity and Sensitivity (CA 2002) 7.2.10 Sections 5.0 and 6.0 of Topic Paper No.6 provide the more detailed considerations that need to be taken into account. 7.2.11 The boxed text, at paragraph 2.11.2 of the Landscape Study, follows the same assessment stages used to assess the landscape capacity to accommodate a specific type of change and given the local scale of the assessment work it is considered that this is the appropriate method to use. 7.2.12 However, Topic Paper No.6, at paragraph 6.5, also goes on to state that: ‘Capacity is all a question of the interaction between the sensitivity of the landscape, the type and amount of change and the way that the landscape is valued’. 7.2.13 Sections 2.11 and 2.12 of the Landscape Study set out the approach used by East Sussex County Council landscape group in undertaking the landscape study. 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Secondly, Policy EN2 (f) does not prohibit development but seeks to protect the Sussex Downs and High Weald AONBs and minimise the impact of development within them by requiring measures to integrate the development into the landscape. Thirdly, there is no Government policy support for the concept of ‘AONB buffers’ in Planning Policy Statement No.7. Like Policy EN2 of the Structure Plan, PPS 7 does not prohibit development within the boundaries or adjoining an AONB but merely seeks to ensure that the landscapes within AONBs are considered carefully and appropriate measures taken to mitigate the harm that potential development may cause. 7.2.22 The fourth point is that, whilst the Council would seek support from Policy EN2 (f) as a way of ‘balancing the comparison between AONB and non AONB areas’ especially the areas of landscape close to the AONB boundary, the East Sussex and Brighton and Hove Structure Plan does not define the extent of the buffer zone on the Key Diagram nor is the extent of the buffer area set out in its explanatory text. 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In addition, it is noted that the Landscape Study has not been subject to peer review and there is no evidence that it has had stakeholder input/consultation with statutory consultees, such Natural England / High Weald AONB Joint Advisory Committee and other interested bodies to agree this approach to the AONBs. 7.2.24 The Study goes on to set out the method used to undertake a comparative evaluation of a potential development area within a character area which has capacity to accommodate development. This gives an early indication of sites which would be worthy of further consideration for development in landscape terms. We contend that the comparative assessment of character areas within the District is flawed as the starting point for the assessment the landscape sensitivity/capacity analysis is unsound for the reason given above. 7.2.25 Notwithstanding the above point, Section 2.15.4 of the Landscape Study states that: ‘Prior to coming to a firm view on the full potential and scope in these areas further investigation would be required’. 7.2.26 However, the Study does not present evidence of this further investigation or how preferred development areas have been chosen; for example there is no detailed assessment of the west of Uckfield area although this has been identified as a major urban extension area under Policy WCS4 - SD1. 7.3 Critical Review of the findings of the Landscape Study 7.3.1 The Landscape Study methodology sets out how each landscape character is to be assessed and the information recorded using landscape character assessment sheets (section 2.5) whilst section 2.17 of the Landscape Study refers to mapping which is split into two stages. Stage 1 relates to recording baseline information on each character area such as planning designation, Public Right of Way and key viewpoint, focal point, landscape features and detractors (which should be read with the assessment record sheets). Stage 2 relates to the identification of potential development areas with indicative boundaries and also identifies key woods, shaws, hedges, tree belts etc and also the potential for mitigation planting. 7.3.2 In order to assess the robustness of the landscape capacity study for the purpose of this representation, the area around Uckfield, Maresfield and Five Ash Down were visited and the baseline information recorded on the landscape assessment sheets checked and the judgements reached reviewed. This check revealed that that were a number of elements/features not recorded or identified for some areas and therefore these factors were not able to inform the judgement reached. 7.3.3 For example, ‘Maresfield Area A’, is described as: ‘An open, undulating landscape used for pasture to the west and pleasure to the east. It is ungrazed showing some scrub. Wide long views to the south. Surrounded on other sides by mature trees and exotic Eucalyptus and Cedars from nearby Park. Fine houses on outskirts and within site. Fine clumps of Pines. Some road noise adjoining picturesque recreation ground’. 7.3.4 The assessment sheet omits a number of important features such as areas of woodlands and plantations, (some of which are ancient woodlands and provide screening, containment and form visual barriers). Hedges, fences, footpaths and reference to the bypass were not recorded. The assessment sheet also refers to parkland and that the majority of the land is amenity land lacking management. A wide long view(s) out to
the south is highlighted as a key feature which is correct when looking south from a small part of the area but elsewhere views are contained and obscured by landform and vegetation. The record sheet includes a photograph of the view south but this is not taken from the recreation ground as recorded on the map Figure 52. The photograph was taken from private land on the footpath. 7.3.5 In the visual appraisal section of the assessment sheet it records the local receptors as amenity land and houses, types of view as long views from top of ridge to the south and visual barriers as landform / trees and hedges. It concludes that the sensitivity is high (see table 7.1 below). It is acknowledged that there are views within the area but these tend to be short partial or glimpsed views with long views out towards the south from high ground in the north eastern parts of character area. Views into the area are very limited and development within the area would have a minimal impact on views. However, in views from the ridge to the south the recreation occupying the north eastern parts of the character area is seen whilst the remaining areas are hidden from view and therefore the visual sensitivity of the majority of the area is low. 7.3.6 The resultant evaluation of this area was considered as follows: Table 7.1: Landscape Study Assessment, Maresfield Area A Character Area Maresfield A Quality Good Value Medium Sensitivity to Change Moderate Visual Sensitivity High Management Opportunities Mange hedges and grazing. Mange recreational spaces and access to countryside. Need to retain gap between Maresfield and Uckfield. 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It is interesting to note that one of the management opportunities is to retain a gap between Maresfield and Uckfield although there is no planning policy support for the retention of gaps in the Core Strategy or previous Non Statutory Wealden Local Plan. 7.3.8 By comparison, another example is Character Area L – land to the west of Uckfield, which is described as: ‘Land sloping away from urban edge to Uck valley and A26 Uckfield by pass. Strong field structure with arable and pasture. Some large fields. Sewage works detractors. Few focuses of character. Development would need a well defined edge to prevent creep’. 7.3.9 The assessment sheet for this character area has recorded the land cover and landscape elements correctly but has not recorded any landform features and relatively few aesthetic factors, although it describes the land as sloping away from the urban edge with a strong field structure with arable and pasture. The landscape condition is considered to be fair which is not defined in the methodology although this changes to ordinary in the comparison table. 7.3.10 In the visual appraisal section of the assessment sheet it records the local receptors as countryside on the other side of Uck Valley, isolated properties, footpaths and A26 and houses on the urban edge, types of view as views across to woods at West Park / Butchers Wood, wooded ridge of Shortbridge across Uckfield Valley and visual barriers as few. It concludes that the sensitivity is ‘moderate’ (see table 7.2). Table 7.2: Landscape Study Assessment, Uckfield Area L Character Area Uckfield L Quality Ordinary Value Medium Snaw Accessible for recreation Sensitivity to Change Moderate Visual Sensitivity Moderate High on ridge Management Opportunities Mange urban fringe. Farm diversification pressure. Manage wood and existing trees and hedges Potential for Mitigation Moderate Low on ridge as need to retain open fields Soften urban edge. Create green network. Relocate recreation ground Capacity to Accept Change: Housing Moderate Need well defined boundaries close to urban edge avoid high ground Capacity to Accept Change: Business No capacity 7.3.11 We contend that the record sheets are incorrect and the judgement on quality / condition is under estimated and should be ‘good’ as most of the land is attractive farmed landscape with some distinctiveness features with a recognisable landscape structure. The assessment sheet ignores the open exposed nature of this character area, with long views south and west and numerous views in to the area from the surrounding countryside (roads and footpaths), and therefore the visual sensitivity of the area should be ‘high’ due the number of viewpoints where views can be obtained. This can be compared to the Maresfield A area which is considered to have ‘high’ sensitivity rating but with a few vantage points available where development impacts will be perceived. 7.3.12 We also note that under management opportunities it is considered that the area could contribute to managing the urban fringe, which could equally apply to the land at Maresfield, and that under the potential for mitigation heading is considered that the area has a ‘moderate’ ability, although the introduction of mitigate planting as shown Figure 11 of the landscape Study would dramatically and significantly change the landscape character of the area. 7.3.13 These examples illustrate the inconsistency of the landscape assessment record sheet and the arbitrary nature of the judgements made. It does not give any confidence to the manner in which the Landscape Study has been undertaken or to the transparent way that the judgements have been reached. 7.4 Implications for the soundness of the Core Strategy 7.4.1 We have reviewed the ‘Landscape Character Assessment and Development Option Evaluation Study’ of the district. It is not clear how this Landscape Study has been used to inform the spatial strategy as it is not specifically referred to in the Core Strategy, nor is the Landscape Study listed as a background paper at paragraph 1.7 of the Core Strategy (although it is included as a background paper on the Councils website). Table 7.4 We have reviewed the methodology set out in the document and we have also reviewed whether the methodology has been consistently applied resulting in a final report that is robust, thorough, and transparent and that it would form a credible evidence base suitable to inform the spatial strategy contained in the Core Strategy. The Study also includes a methodology employed to undertake a comparative evaluation of a potential development area within a character area which has capacity to accommodate development. 7.4.3 The examples referred to in our analysis above illustrate the inconsistency of the landscape assessment record sheets and arbitrary nature of the judgements made and it does not give any confidence to the manner in which the
Summary of all Representations - Proposed Submission Core Strategy Regulation 27 - Report 11th July 2011

Landscape Study has been undertaken or to the transparent way that the judgements have been reached. 7.4.4 We contend that the Landscape Study is flawed and therefore the assessment of housing sites in the district, the spatial strategy and the Councils Sustainability Appraisal is unsound. In addition, in relation to the comparison assessment of sites within the district surrounding the towns and villages; we contend that this comparative assessment of character areas is flawed as the starting point for the assessment the landscape sensitivity / capacity analysis is unsound for the reason given above. 7.4.5 The Core Strategy proposes that the land to the west of Uckfield be identified as a ‘strategic development area’ suitable for accommodating 1,000 homes and some 12,650 sq metres net of employment floor space and education provision as an extension to the urban area to the west of New Town. In the light of the comments made on the Landscape Study, it is considered that this proposal be reassessed and, (taking into account the other representations made on other parts and policies contained in the Core Strategy), greater emphasis be given to the suitability of land at Maresfield to accommodate increased housing numbers and a larger proportion of the housing requirements for the district. 7.4.6 Policy WSC13 relating to Green Infrastructure is supported although it is considered that the anomalies and errors in the Landscape Study be addressed before this document is used to inform and guide the implementation of Green Infrastructure Strategy and also formulation of the specific measures for the protection and enhancement of the landscape which are to set out in the Delivery and Site Allocations DPD referred to at paragraph 7.28 of the Core Strategy. 

Details of Changes to be Made:

SUMMARY 7.4.7 In conclusion, we contend that the Core Strategy is unsound because: 1. It is not justified as it is not based on a sound evidence base as the Landscape Study (Landscape Character Assessment and Development Options Evaluation Study of the District) is flawed and therefore the assessment of housing sites in the district, the spatial strategy and the Councils Sustainability Appraisal is unsound. It is not clear how the Landscape Study has been used to inform the spatial strategy as it is not specifically referred to in the Core Strategy nor is the Landscape Study listed as a background paper at paragraph 1.7 of the Core Strategy; 2. It is not justified because the Landscape Study as it is not robust, thorough, and transparent and that it does not form a credible evidence base suitable to inform the spatial strategy contained in the Core Strategy. The Landscape Study contains a number inconsistencies set out in the landscape assessment record sheets and contains a number of arbitrary judgements and so it does not give any confidence to the manner in which the Landscape Study has been undertaken or to the transparent way that the judgements have been reached 3. It is not consistent with national policy as the methodology for undertaking the Landscape Study (which has been used to inform the spatial strategy) refers to ‘AONB and AONB Buffer Zones’ as a way of identifying higher value landscapes. There are a number of reasons why this approach is unsound but there is no Government policy support for the concept of ‘AONB buffers’ in Planning Policy Statement No.7 or any other policy guidance.

Representation ID
733

Person ID Mr Shaw Agent ID
103076 High Weald AONB Unit, Woodlands Enterprise Centre

Paragraph 7.28

Sound □ Yes □ No □ Justified □ Effective □ Consistent with national policy

Legally Compliant □ Yes □ No

Details of Reasons for Soundess/ Legal Complaince:

There is concern that although the AONB is referred to in detailed discussion of various locations, it does not have the profile and reference within the text that would support the statutory duty under Section 85 of the Countryside and Rights of Way Act 2000 to have regard to natural beauty. The submission document does not deal with landscape issues, covering both the High Weald AONB and the South Downs National park, in a strategic way. These designated landscapes cover over 60% of the district area and make a significant contribution to its character. This merits a higher profile policy and strategic reponse to be made in the document. The Unit would recommend a stategic reference to be made to the importance of the AONB, and a detailed policy reference made both to this and to the High Weald AONB Management Plan. The only reference to policy for the AONB comes at the end of the document under the green infrastructure section. The commitment to include landscape polices in the site allocations DPD is questioned as this may infer that AONB policy will only be referred to in relation to specific allocations, and not be a strategic and overall approach to landscape issues in the District.

Details of Changes to be Made:
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<tr>
<th>Representation ID</th>
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<tr>
<td>516</td>
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Paragraph 7.28

Sound  

- Yes  
- No  
- Justified  
- Effective  
- Consistent with national policy

Legally Compliant  

- Yes  
- No

Details of Reasons for Soundness/ Legal Compliance:

Details of Changes to be Made:
7.1.1 In this section of the report we present our representations in regard to landscape matters in and informing the Core Strategy. Our representation is made in regard to paragraphs 3.30 – 3.33 of the submission Core Strategy, Policies WC4 and WC13 and supporting background papers. 7.1.2 For the purposes of this representation we have reviewed the ‘Landscape Character Assessment and Development Option Evaluation Study’ undertaken for the district (referred hereinafter as the ‘Landscape Study’), which is included as a background paper to the Core Strategy on the Councils website. However, it is not clear how the Landscape Study has been used to inform the spatial strategy as it is not specifically referred to in the text of Core Strategy nor is the Landscape Study listed as a background paper at paragraph 1.7 of the Core Strategy (although it is included as a background paper on the Councils website). 7.1.3 We have reviewed the methodology set out in the document and we have also reviewed whether the methodology has been consistently applied resulting in a final report that is robust, thorough and transparent and one that would form a credible evidence base suitable to inform the spatial strategy contained in the Core Strategy. 7.1.4 We contend that the Landscape Study is flawed and therefore the assessment of housing sites in the district, the spatial strategy and the Councils Sustainability Appraisal, and thus the Core Strategy, is unsound. 7.1.5 Our representation is summarised below: Section of Core Strategy: Spatial Planning Objectives 1, 3 and 11, Paras 3.30 - 3.33, Policy WCS4 Strategic Development Areas, Figure 6 Uckfield Area Strategy, Paras 6.9 and 6.11, Policy WSC13 Green Infrastructure, Paras 7.23 - 7.28Legally Compliant: -Sound: NoJustified: NoEffective: -Consistent with national policy: No Proposed Submission Core Strategy Paragraphs 3.30 – 3.33 7.1.6 Paragraph 3.30 of the Proposed Submission Core Strategy refers to Wealden’s environmental attributes and that they have an important part to play in the development of the spatial strategy and ‘had a significant impact upon the assessment of the suitability of housing land in relation to the SHLAA’. 7.1.7 Paragraph 3.30 goes on to state that: “...and sites have been carefully scrutinised with regards to landscape impact.” 7.1.8 Paragraph 3.33 refers to Government guidance and the level of protection this provides for the environment, particularly nationally and internationally designated sites, which are not duplicated in the Core Strategy. The paragraph goes on to state: “However, our strategy has been guided by high levels of protection on local and national levels, and more detailed policies are contained within the Core Strategy and further ones in subsequent DPDs.” 7.1.9 Paragraph 1.7 in the Introduction to the Core Strategy refers to a number of specialist studies that have been produced to provide a robust evidence base to inform the Local Development Framework. The Landscape Study is not listed as a background paper at paragraph 1.7 of the Core Strategy (although it is included as a background paper on the Councils website). Policy WCS4 Strategic Development Areas and Paragraphs 6.9 and 6.11 7.1.10 The Core Strategy proposes that the land to the west of Uckfield be identified as a ‘strategic development area’ suitable for accommodating 1,000 homes and some 12,650 sq metres net of employment floor space and education provision as an extension to the urban area to the west of New Town. Paragraph 6.9 refers to the SHLAA and assessment of the potential sites at the fringes of the urban area. 7.1.11 In the light of the comments that follow in this section of our representations on the Landscape Study, it considered that this proposal be reassessed and, taking into account other representations made on other parts and policies contained in the Core Strategy, greater emphasis should be given to the suitability of land at Maresfield to accommodate increased housing numbers and a larger proportion of the housing requirements for the district. Policy WSC13 Green Infrastructure, Paragraphs 7.23 - 7.28 and Background Paper BP6 7.1.12 Policy WSC13 and paragraph 7.23 to 7.28 relating to Green Infrastructure is supported although it is considered that the anomalies and errors in the Landscape Study be addressed before this document is used to inform and guide the implementation of Green Infrastructure Strategy and also formulation of the specific measures for the protection and enhancement of the landscape which are to be set out in the Delivery and Site Allocations DPD referred to at paragraph 7.28 of the Core Strategy. 7.1.13 It is not clear from reading the Core Strategy, how the Landscape Study has been used to inform the above policies. 7.2 Consideration of the Methodology employed in the Landscape Study 7.2.1 Wealden Council commissioned the Landscape Study from the Landscape Group at East Sussex County Council, in September 2007. It was published in February 2009. The purpose of the Study is to: 1. Inform the preparation of WDC Local Development Framework Core Strategy and; 2. Inform the development policies on landscape management and protection. 7.2.2 The Landscape Study states that it will: 1. Assess the existing landscape character of key search areas 2. Assess the quality and value of the existing landscape in these key search areas 3. Assess the sensitivity if the existing landscape and its capacity to accept change or having regard to the scope for mitigation 4. Make recommendations on preferred locations from a landscape perspective. 7.2.3 The Landscape Study purports to use a number of methodologies for the assessment and
identifies these as being: 1. For Landscape Character/ Quality and Value - Design Manual for Roads and Bridges Vol 11, section 3, Part 5 (DT) which has been further refined by the Landscape Character Assessment Guidance for England and Scotland (CA/SNH 2002) and; 2. For landscape sensitivity – Landscape Character Assessment Guidance for England and Scotland, Topic Paper No.6: Techniques and criteria for Judging Capacity and Sensitivity (CA 2002). 7.2.4 The Landscape Study sets out, in section 2.0, the methodology and criteria used for each aspect of the landscape being assessed, including the following: 1. Landscape Quality (this should be ‘condition’ if following latest LCA guidance as the term quality is now a discredited approach to assessing landscapes) 2. Landscape Value 3. Landscape Sensitivity 4. Visual Sensitivity 5. Landscape Capacity 7.2.5 In relation to the assessment of landscape capacity, capacity is defined in Topic Paper No.6: ‘Techniques and Criteria for Judging Capacity and Sensitivity’ as: ‘The degree to which a particular landscape type or area is able to accommodate change without significant effect on its character, or overall change of landscape character type. Capacity is likely to vary according to the type and nature of change being proposed’. 7.2.6 We have reviewed the Landscape Study, in particular, the methodology set out in the document and whether this has been consistently applied to form a credible evidence base suitable to inform the spatial strategy contained in the Core Strategy. 7.2.7 The review of the Core Strategy background paper indicates that the Landscape Study has not followed the guidance in Topic Paper No.6. Topic Paper No.6 suggests that there are two approaches to assessing landscape sensitivity. These are: 1. Judging Overall Landscape Sensitivity and; 2. Judging Landscape Sensitivity to a specific type of change. 7.2.8 However, in order to assess landscape capacity, the assessment of the sensitivity of different types or areas of landscape to the type of change in question must be combined with an assessment of the more subjective or perceptual aspects of the landscape and of the value attached to the landscape. 7.2.9 The stages for assessing landscape capacity of a landscape are set out in Section 3.0 of Topic Paper No.6 and reproduced in Figure 7.1 below. Figure 7.1: Stages for assessing landscape capacity Source: Landscape Character Assessment Guidance for England and Scotland, Topic Paper No.6: Techniques and criteria for Judging Capacity and Sensitivity (CA 2002) 7.2.10 Sections 5.0 and 6.0 of Topic Paper No.6 provide the more detailed considerations that need to be taken into account. 7.2.11 The boxed text, at paragraph 2.11.2 of the Landscape Study, follows the same assessment stages used to assess the landscape capacity to accommodate a specific type of change and given the local scale of the assessment work it is considered that this is the appropriate method to use. 7.2.12 However, Topic Paper No.6, at paragraph 6.5, also goes on to state that: ‘Capacity is all a question of the interaction between the sensitivity of the landscape, the type and amount of change and the way that the landscape is valued’. 7.2.13 Sections 2.11 and 2.12 of the Landscape Study set out the approach used by East Sussex County Council landscape group in undertaking the landscape study. However, the assessment does not define the quantum of housing development used to assess the capacity of each character area, nor is the LDF Core Issues and Options Consultation Paper July 2007 referred to as a guide to the quantum of housing development used to assess each of the different character areas. The Landscape Study does however state at paragraph 2.12.3 that: ‘an overall assessment can be made for each character area on the capacity to accept the type of change being considered. This judgement is made according to the combination of characteristics that contribute to a particular area of landscape. The capacity of an area to accept change is related to the potential of the area to accommodate development in a particular location without detracting from the overall character of that landscape. The capacity evaluation of each character area does not assume that this is the capacity across the entire character area’ 7.2.14 There are a number interrelated issues raised in the above paragraph which we now turn to. 7.2.15 In relation to the type of change, the Landscape Study defines, at paragraph 2.12.6, the assumptions used for the assessment business uses, i.e. the assessment of sensitivity / capacity is based on light industrial type uses which would be consistent with a residential environment and these would be single storey units. However the Landscape Study does not define the full details of the housing use, such as type (housing - single storey / two storey / three storey etc) or amount (large / medium / small scale development) and we contend that the details of the change being considered is not transparent from the Landscape Study, as although the type of change (i.e. housing) is known, the form and amount of housing is unknown. These are important factors when considering the landscape capacity of an area to accommodate development, especially if using the stages set in the Landscape Study. 7.2.16 A similar assumption to the business use (or range of assumptions) could have been used for assessing the impact of housing on landscape sensitivity / capacity of each character area. For example two to three storey houses at the following ranges: 1. small scale housing between five to 50 dwellings 2. medium scale housing development between 50 to 200 dwellings, and 3. large scale housing development between 200 to 500 dwellings. 7.2.17 In relation to the combination of the characteristics that contribute to a particular area, comments on these are made in later sections (See paragraphs 7.4.1 to 7.4.14 below). 7.2.18 The Landscape Study also refers to mitigation and management of the landscape (Section 2.13) and, in paragraph 2.13.1, it highlights that mitigation has been used to determine the visual and character sensitivity of the landscape. This approach does not accord with Topic Paper No.6 as mitigation should only be used to inform the visual sensitivity of the area assessed, (See Figure 7.1 above), and not directly the character sensitivity of an area (although visual aspects are one of the aspects that inform the character of an area). Mitigation in itself can have a significant effect on character and the landscapes capacity to accommodate development. In some cases mitigation would make an area less suitable to accommodate development not more suitable. Again this, we would contend, is a flaw in the assessment. The existing management of the landscape is relevant to determining the condition (or quality) of an area of landscape but the identification of management opportunities is not relevant to determining the capacity of the landscape to
accommodate development. Management of the land could in itself bring about a change to the landscape which is discordant with its character, for instance managing the land to encourage woodland growth or planting extensive woodlands in a very open exposed landscape would lead to a significant change. 7.2.19 The methodological section of the Landscape Study also includes a part dealing with the Areas of Outstanding Natural Beauty (AONB) within the district. Section 2.14 refers to ‘AONBs and AONB Buffer Zones’ as a way of identifying higher value landscapes within Wealden. At paragraph 2.14.2 the Landscape Study states: ‘There is, in some areas adjacent to the AONB boundary a buffer zone to the AONB landscape. This is usually an area of similar character but not of the same quality as the AONB landscape and not covered by the same planning policy. Where relevant these areas are indicated in the figures’. 7.2.20 Paragraph 2.14.4, the Landscape Study goes on the state the following: ‘These buffer zones have been identified through the character area analysis. The relative sensitivity of these areas has been considered according to the landscape character to achieve a balanced comparison with AONB and AONB landscapes’. 7.2.21 The Landscape Study considers that there is support for this ‘buffer zone’ approach due to Policy EN2 (f) of the East Sussex and Brighton and Hove Structure Plan. We contend that this approach is flawed and unsound. Firstly, the Structure Plan has been superseded by the South East Plan and at the time of preparing the Landscape Study during the period August 2007 to February 2009, both East Sussex County Council and Wealden District Council would have been aware of the emerging South East Plan policies through the draft regional plan. Secondly, Policy EN2 (f) does not prohibit development but seeks to protect the Sussex Downs and High Weald AONBs and minimise the impact of development within them by requiring measures to integrate the development in to the landscape. Thirdly, there is no Government policy support for the concept of ‘AONB buffers’ in Planning Policy Statement No.7. Like Policy EN2 of the Structure Plan, PPS 7 does not prohibit development within the boundaries or adjoining an AONB but merely seeks to ensure that the landscapes within AONBs are considered carefully and appropriate measures taken to mitigate the harm that potential development may cause. 7.2.22 The fourth point is that, whilst the Council would seek support from Policy EN2 (f) as a way of balancing the comparison between AONB and non AONB areas’ especially the areas of landscape close to the AONB boundary, the East Sussex and Brighton and Hove Structure Plan does not define the extent of the buffer zone on the Key Diagram nor is the extent of the buffer area set out in its explanatory text. We contend that the justification for this approach must be given very little weight. 7.2.23 Lastly, it is acknowledged that some areas of landscape within an AONB may be of poorer condition (quality) score and / or lower visual and character sensitivity than areas outside of the AONB but the adjustment in the landscape sensitivity / capacity scoring by introducing what appears to be an arbitrary AONB buffer zone seems to undermine the purposes and status of the AONB designation,(and its planning policy protection), by attaching increased value to a character area that adjoins the AONB which although it may be of a similar character, does not meet the quality criteria for inclusion within the AONB. In addition, it is noted that the Landscape Study has not been subject to peer review and there is no evidence that it has had stakeholder input / consultation with statutory consultees, such Natural England / High Weald AONB Joint Advisory Committee and other interested bodies to agree this approach to the AONBs. 7.2.24 The Study goes on to set out the method used to undertake a comparative evaluation of a potential development area within a character area which has capacity to accommodate development. This gives an early indication of sites which would be worthy of further consideration for development in landscape terms. 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the south is highlighted as a key feature which is correct when looking south from a small part of the area but elsewhere views are contained and obscured by landform and vegetation. The record sheet includes a photograph of the view south but this is not taken from the recreation ground as recorded on the map Figure 52. The photograph was taken from private land on the footpath. 7.3.5 In the visual appraisal section of the assessment sheet it records the local receptors as amenity land and houses, types of view as long views from top of ridge to the south and visual barriers as landform / trees and hedges. It concludes that the sensitivity is high (see table 7.1 below). It is acknowledged that there are views within the area but these tend to be short partial or glimpsed views with long views out towards the south from high ground in the north eastern parts of character area. Views into the area are very limited and development within the area would have a minimal impact on views. 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Potential for Mitigation Low.Planting would change open character and obscure long views out from recreation ground Capacity to Accept Change: Housing Low.Close to village edge only Capacity to Accept Change: Business Low. 7.3.7 We contend that the record sheets are incorrect and the judgement on quality / condition is erroneous and should be ‘ordinary’ as most of the land is unmanaged comprising rank grassland of little intrinsic landscape value and the visual sensitivity of the area is ‘moderate or low’ due to the strong enclosure afforded to the area. It is interesting to note that one of the management opportunities is to retain a gap between Maresfield and Uckfield although there is no planning policy support for the retention of gaps in the Core Strategy or previous Non Statutory Wealden Local Plan. 7.3.8 By comparison, another example is Character Area L – land to the west of Uckfield, which is described as: ‘Land sloping away from urban edge to Uck valley and A26 Uckfield by pass. Strong field structure with arable and pasture. Some large fields. Sewage works detractors. Few focuses of character. Development would need a well defined edge to prevent creep’. 7.3.9 The assessment sheet for this character area has recorded the land cover and landscape elements correctly but has not recorded any landform features and relatively few aesthetic factors, although it describes the land as sloping away from the urban edge with a strong field structure with arable and pasture. The landscape condition is considered to be fair which is not defined in the methodology although this changes to ordinary in the comparison table. 7.3.10 In the visual appraisal section of the assessment sheet it records the local receptors as countryside on the other side of Uck Valley, isolated properties, footpaths and A26 and houses on the urban edge, types of view as views across to woods at West Park / Butchers Wood, wooded ridge of Shortbridge across Uckfield Valley and visual barriers as few. It concludes that the sensitivity is ‘moderate’ (see table 7.2). Table 7.2: Landscape Study Assessment, Uckfield Area L Character Area Uckfield L Quality Ordinary Value Medium Snaw Accessible for recreation Sensitivity to Change Moderate Visual Sensitivity Moderate High on ridge Management Opportunities Mange urban fringe. Farm diversification pressure. Manage wood and existing trees and hedges. Potential for Mitigation Moderate. Low on ridge as need to retain open fields. Soften urban edge. Create green network. Relocate recreation ground Capacity to Accept Change: Housing Moderate. Need well defined boundaries close to urban edge avoid high ground Capacity to Accept Change: Business No capacity. 7.3.11 We contend that the record sheets are incorrect and the judgement on quality / condition is under estimated and should be ‘good’ as most of the land is attractive farmed landscape with some distinctiveness features with a recognisable landscape structure. The assessment sheet ignores the open exposed nature of this character area, with long views south and west and numerous views in to the area from the surrounding countryside (roads and footpaths), and therefore the visual sensitivity of the area should be ‘high’ due the number of viewpoints where views can be obtained. This can be compared to the Maresfield A area which is considered to have ‘high’ sensitivity rating but with a few vantage points available where development impacts will be perceived. 7.3.12 We also note that under management opportunities it is considered that the area could contribute to managing the urban fringe, which could equally apply to the land at Maresfield, and that under the potential for mitigation heading is considered that the area has a ‘moderate’ ability, although the introduction of mitigate planting as shown Figure 11 of the landscape Study would dramatically and significantly change the landscape character of the area. 7.3.13 These examples illustrate the inconsistency of the landscape assessment record sheet and the arbitrary nature of the judgements made. It does not give any confidence to the manner in which the Landscape Study has been undertaken or to the transparent way that the judgements have been reached. 7.4 Implications for the soundness of the Core Strategy 7.4.1 We have reviewed the ‘Landscape Character Assessment and Development Option Evaluation Study’ of the district. It is not clear how this Landscape Study has been used to inform the spatial strategy as it is not specifically referred to in the Core Strategy, nor is the Landscape Study listed as a background paper at paragraph 1.7 of the Core Strategy (although it is included as a background paper on the Councils website). 7.4.2 We have reviewed the methodology set out in the document and we have also reviewed whether the methodology has been consistently applied resulting in a final report that is robust, thorough, and transparent and that it would form a credible evidence base suitable to inform the spatial strategy contained in the Core Strategy. The Study also includes a methodology employed to undertake a comparative evaluation of a potential development area within a character area which has capacity to accommodate development. 7.4.3 The examples referred to in our analysis above illustrate the inconsistency of the landscape assessment record sheets and arbitrary nature of the judgements made and it does not give any confidence to the manner in which the
Summary of all Representations - Proposed Submission Core Strategy Regulation 27 - Report 11th July 2011

Landscape Study has been undertaken or to the transparent way that the judgements have been reached. 7.4.4 We contend that the Landscape Study is flawed and therefore the assessment of housing sites in the district, the spatial strategy and the Councils Sustainability Appraisal is unsound. In addition, in relation to the comparison assessment of sites within the district surrounding the towns and villages; we contend that this comparative assessment of character areas is flawed as the starting point for the assessment the landscape sensitivity / capacity analysis is unsound for the reason given above. 7.4.5 The Core Strategy proposes that the land to the west of Uckfield be identified as a ‘strategic development area’ suitable for accommodating 1,000 homes and some 12,650 sq metres net of employment floor space and education provision as an extension to the urban area to the west of New Town. In the light of the comments made on the Landscape Study, it is considered that this proposal be reassessed and, (taking into account the other representations made on other parts and policies contained in the Core Strategy), greater emphasis be given to the suitability of land at Maresfield to accommodate increased housing numbers and a larger proportion of the housing requirements for the district. 7.4.6 Policy WSC13 relating to Green Infrastructure is supported although it is considered that the anomalies and errors in the Landscape Study be addressed before this document is used to inform and guide the implementation of Green Infrastructure Strategy and also formulation of the specific measures for the protection and enhancement of the landscape which are to set out in the Delivery and Site Allocations DPD referred to at paragraph 7.28 of the Core Strategy.

Details of Changes to be Made:

SUMMARY 7.4.7 In conclusion, we contends that the Core Strategy is unsound because: 1. It is not justified as it is not based on a sound evidence base as the Landscape Study (Landscape Character Assessment and Development Options Evaluation Study of the District) is flawed and therefore the assessment of housing sites in the district, the spatial strategy and the Councils Sustainability Appraisal is unsound. It is not clear how the Landscape Study has been used to inform the spatial strategy as it is not specifically referred to in the Core Strategy nor is the Landscape Study listed as a background paper at paragraph 1.7 of the Core Strategy; 2. It is not justified because the Landscape Study as it is not robust, thorough, and transparent and that it does not form a credible evidence base suitable to inform the spatial strategy contained in the Core Strategy. The Landscape Study contains a number inconsistencies set out in the landscape assessment record sheets and contains a number of arbitrary judgements and so it does not give any confidence to the manner in which the Landscape Study has been undertaken or to the transparent way that the judgements have been reached 3. It is not consistent with national policy as the methodology for undertaking the Landscape Study (which has been used to inform the spatial strategy) refers to ‘AONB and AONB Buffer Zones’ as a way of identifying higher value landscapes. There are a number of reasons why this approach is unsound but there is no Government policy support for the concept of ‘AONB buffers’ in Planning Policy Statement No.7 or any other policy guidance.
Details of Reasons for Soundess/ Legal Complaince:
The inclusion of a Policy dealing with the important issue of Green Infrastructure is strongly supported and there is considerable scope for joint working between Eastbourne Borough Council and Wealden District Council to ensure that the “existing network of green infrastructure will be protected, improved and enhanced” as advocated in Policy WCS13. Eastbourne Borough Council is currently preparing a Supplementary Planning Document for Eastbourne Park. It is a document which will set out a detailed vision and series of proposals to conserve and enhance the existing environmental and ecological characteristics of Eastbourne Park, whilst at the same time sensitively developing one of the Borough’s most important under-utilised resource for appropriate leisure and recreational uses to help enhance the social and economic well-being of the local community and attract more visitors to the Borough. It is envisaged that the proposals set out in Policy D11 of the Eastbourne Plan and expanded upon in the Eastbourne Park SPD will provide benefits for existing residents in Polegate/Willingdon and Stone Cross as well as future residents living in the proposed urban extensions (SD4: Land at South Polegate and East Willingdon, SD6: Land at East and South East of Stone Cross, and SD7: Land at North Stone Cross) advocated in Policy WCS4: Strategic Development Areas and shown on the Key Diagram. Eastbourne Park has the potential to be extended northwards into Wealden providing excellent local access to an important area of green infrastructure. The area of land immediately south of SD5 and SD7 (south of the proposed Willingdon Chord railway line) and which is shown on Figure 8 to be an area at risk from flooding would be ideal for providing green infrastructure to compliment the existing residential areas. The Borough Council considers that there would be considerable merit in both authorities working closely together to ensure a seamless transition over their respective administrative areas to enable residents in the southern part of Wealden and Eastbourne to have enhanced access to a larger and attractive area of green infrastructure whilst also preserving it for its important ecological value.

Details of Changes to be Made:
### Representation ID 582

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<th>Agent ID</th>
<th>Mr Stafford</th>
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<td>522174</td>
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**WCS13 Green Infrastructure**

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**Legally Compliant**

| Yes | No |

**Details of Reasons for Soundess/ Legal Complaince:**

It should be recognised that new development often has the benefit of being able to open up otherwise unusable open spaces for the benefit of the community.

**Details of Changes to be Made:**

| Yes | No | Justified | Effective | Consistent with national policy |

### Representation ID 737

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**WCS13 Green Infrastructure**

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**Legally Compliant**

| Yes | No |

**Details of Reasons for Soundess/ Legal Complaince:**

The Unit welcomes the Green Infrastructure policy and recognises that reference is made to landscape and AONB issues in the supporting GI Background Paper. It is considered that the range of issues that this policy is trying to cover mean that it is more than a GI policy and could more fully encompass a full eco-sytems or Landscape Services approach, detailing the goods, services and attributes that the landscape provides and how they can be sustainable and responsibly exploited to provide a sustainable approach to Wealden's development needs. Full reference to the role of the AONB and the importance of the AONB Management Plan in supporting decision making for Landscape/ecosystem services, as well as wider landscape protection and enhancement, in this policy, would be very much welcomed. It is recommended that this be incorporated within the draft proposed Policy relating to Green Infrastructure.

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**Details of Reasons for Soundness/ Legal Compliance:**

The Unit welcomes the Green Infrastructure policy and recognises that reference is made to landscape and AONB issues in the supporting GI Background Paper. It is considered that the range of issues that this policy is trying to cover mean that it is more than a GI policy and could more fully encompass a full eco-systms or Landscape Services approach, detailing the goods, services and attributes that the landscape provides and how they can be sustainable and responsibly exploited to provide a sustainable approach to Wealden's development needs. Full reference to the role of the AONB and the importance of the AONB Management Plan in supporting decision making for Landscape/ecosystem services, as well as wider landscape protection and enhancement, in this policy, would be very much welcomed. It is recommended that this be incorporated within the draft proposed Policy relating to Green Infrastructure.

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**Details of Reasons for Soundess/ Legal Compliance:**

We support Policy WCS13 - Green Infrastructure - but feel strongly that the national park should be specifically mentioned in both the policy and its preamble.

**Details of Changes to be Made:**

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**Details of Reasons for Soundess/ Legal Compliance:**

We support Policy SCS13 - Green infrastructure - but feel strongly that the national park should be specifically mentioned in both the policy and its preamble.

**Details of Changes to Be Made:**
Representation ID
432
Person ID  Wea
521960  Wealden Councillors for Crowborough
Agent ID
WCS13 Green Infrastructure

Details of Reasons for Soundess/ Legal Complaince:
The Crowborough councillors are concerned about how recent density of development would relate to the statement in Background Paper 5 on Biodiversity, particularly 9.13, 9.15 and 9.18. There have been many opportunities in the past 3-4 years in Crowborough to uphold the principles of biodiversity, green corridors and connectivity of habitats referred to in those paragraphs but there does not seem to be a culture within the development control process to do this. It has also frequently been the case that the sheer density of development has made these aspirations unachievable. The Crowborough councillors would therefore like to make the point now, that future DPDs must be sincere and determined in protecting wildlife habitats and the general green environment within towns. We wish to stress the importance of retaining as much as possible of what exists on a site, particularly round the edges and where it assists connectivity, rather than destroying it and then re-planting. Once an established habitat is lost, it is seldom regained with planting. We feel that the only way in which local wishes for an environment with a rural feel can be achieved is with lower density development than has been the case recently.

Details of Changes to be Made:
The PSCS sets out an aspiration to enhance the District's bio-diversity by creating a coherent network of green infrastructure, especially in and around towns that can better support wildlife and improve public health through increased accessibility. This is encapsulated in Policy WCS13 which seeks to maintain and improve 'Green Infrastructure'. Paragraph 6.11(5) states that the strategy for Uckfield, includes supporting the creation of additional amenity and open space along the river corridor, though it is not made clear if this relates solely to the river Uck or extends to its tributaries. In any event Figure 6 indicates there is 'green infrastructure potential' to either side of the Lewes Road along the south-eastern edge of the town. This appears to include land within the ownership of Ridgewood House. It is assumed this reflects an aspiration for enhanced bio-diversity and public access along the corridor of the Ridgewood Stream, linking up to the adjacent Millennium Green to the east. No objection is raised in principle to the concept of enhanced green infrastructure, and its associated benefits. However, it must be recognised within the PSCS that this can only be achieved in conjunction with associated housing development. This will enable support from affected landowners and provide the requisite funding to deliver the green infrastructure enhancement and maintain it in the future. On this basis the PSCS should be modified to note that green infrastructure potential will be delivered in conjunction with associated development, including housing. Consequential changes should be made to Figure 6 of the Uckfield Area Strategy to note that delivery of green infrastructure on land to the east of the Lewes Road, will be delivered in conjunction with housing development under SD1. Failure to acknowledge the necessary linkage between development additional green infrastructure provision will not result in an effective and deliverable Core Strategy.

Details of Changes to be Made:

On this basis the PSCS should be modified to note that green infrastructure potential will be delivered in conjunction with associated development, including housing. Consequential changes should be made to Figure 6 of the Uckfield Area Strategy to note that delivery of green infrastructure on land to the east of the Lewes Road, will be delivered in conjunction with housing development under SD1. Failure to acknowledge the necessary linkage between development additional green infrastructure provision will not result in an effective and deliverable Core Strategy.
Representation ID
281

Person ID  Mr  Hurwood
134707  CPRE Sussex, Wealden South Group

Agent ID
WCS13 Green Infrastructure Policy 13

Sound  □ Yes  □ No  □ Justified  □ Effective  □ Consistent with national policy
Legally Compliant  □ Yes  □ No

Details of Reasons for Soundness/ Legal Complaince:

Details of Changes to be Made:
WCS 13 Please see the comments made for WCS 12
7.1.1 In this section of our representations on the Landscape Study, it is included as a background paper to the Core Strategy. However, it is not clear how the Landscape Study has been used to inform the spatial strategy contained in the Core Strategy. 7.1.2 For the purposes of this representation we have reviewed the ‘Landscape Character Assessment and Development Option Evaluation Study’ undertaken for the district (referred hereinafter as the ‘Landscape Study’), which is included as a background paper to the Core Strategy on the Councils website. However, it is not clear how the Landscape Study has been used to inform the spatial strategy contained in the Core Strategy as it is not specifically referred to in the text of Core Strategy nor is the Landscape Study listed as a background paper at paragraph 1.7 of the Core Strategy (although it is included as a background paper on the Councils website). 7.1.3 We have reviewed the methodology set out in the document and we have also reviewed whether the methodology has been consistently applied resulting in a final report that is robust, thorough and transparent and one that would form a credible evidence base suitable to inform the spatial strategy contained in the Core Strategy. 7.1.4 We contend that the Landscape Study is flawed and therefore the assessment of housing sites in the district, the spatial strategy and the Councils Sustainability Appraisal, and thus the Core Strategy, is unsound. 7.1.5 Our representation is summarised below: Section of Core Strategy: Spatial Planning Objectives 1, 3 and 11, Paras 3.30 – 3.33, Policy WCS4 Strategic Development Areas, Figure 6 Uckfield Area Strategy, Paras 6.9 and 6.11, Policy WSC13 Green Infrastructure, Paras 7.23 – 7.28Legally Compliant: -Sound: NoJustified: NoEffective: -Consistent with national policy: No Proposed Submission Core Strategy Paragraphs 3.30 – 3.33 7.1.6 Paragraph 3.30 of the Proposed Submission Core Strategy refers to Wealden’s environmental attributes and that they have an important part to play in the development of the spatial strategy and ‘had a significant impact upon the assessment of the suitability of housing land in relation to the SLHAA’. 7.1.7 Paragraph 3.30 goes on to state that: “…and sites have been carefully scrutinised with regards to landscape impact.” 7.1.8 Paragraph 3.33 refers to Government guidance and the level of protection this provides for the environment, particularly nationally and internationally designated sites, which are not duplicated in the Core Strategy. The paragraph goes on to state: “However, our strategy has been guided by high levels of protection on local and national levels, and more detailed policies are contained within the Core Strategy and further ones in subsequent DPDs.” 7.1.9 Paragraph 1.7 in the Introduction to the Core Strategy refers to a number of specialist studies that have been produced to provide a robust evidence base to inform the Local Development Framework. The Landscape Study is not listed as a background paper at paragraph 1.7 of the Core Strategy (although it is included as a background paper on the Councils website). Policy WCS4 Strategic Development Areas and Paragraphs 6.9 and 6.11 7.1.10 The Core Strategy proposes that the land to the west of Uckfield be identified as a ‘strategic development area’ suitable for accommodating 1,000 homes and some 12,650 sq metres of employment floor space and education provision as an extension to the urban area to the west of New Town. Paragraph 6.9 refers to the SLHAA and assessment of the potential sites at the fringes of the urban area. 7.1.11 In the light of the comments that follow in this section of our representations on the Landscape Study, it considered that this proposal be reassessed and, taking into account other representations made on other parts and policies contained in the Core Strategy, greater emphasis should be given to the suitability of land at Maresfield to accommodate increased housing numbers and a larger proportion of the housing requirements for the district. Policy WSC13 Green Infrastructure, Paragraphs 7.23 - 7.28 and Background Paper BP6 7.1.12 Policy WSC13 and paragraph 7.23 to 7.28 relating to Green Infrastructure is supported although it is considered that the anomalies and errors in the Landscape Study be addressed before this document is used to inform and guide the implementation of Green Infrastructure Strategy and also formulation of the specific measures for the protection and enhancement of the landscape which are to be set out in the Delivery and Site Allocations DPD referred to at paragraph 7.28 of the Core Strategy. 7.1.13 It is not clear from reading the Core Strategy, how the Landscape Study has been used to inform the above policies. 7.2 Consideration of the Methodology employed in the Landscape Study 7.2.1 Wealden Council commissioned the Landscape Study from the Landscape Group at East Sussex County Council, in September 2007. It was published in February 2009. The purpose of the Study is to: 1. Inform the preparation of WDC Local Development Framework Core Strategy and 2. Inform the development policies on landscape management and protection. 7.2.2 The Landscape Study states that it will: 1. Assess the existing landscape character of key search areas 2. Assess the quality and value of the existing landscape in these key search areas 3. Assess the sensitivity if the existing landscape and its capacity to accept change or having regard to the scope for mitigation 4. Make recommendations on preferred locations from a landscape

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perspective. 7.2.3 The Landscape Study purports to use a number of methodologies for the assessment and identifies these as being: 1. For Landscape Character/ Quality and Value - Design Manual for Roads and Bridges Vol 11, section 3, Part 5 (DT) which has been further refined by the Landscape Character Assessment Guidance for England and Scotland (CA/SNH 2002) and; 2. For landscape sensitivity – Landscape Character Assessment Guidance for England and Scotland, Topic Paper No.6: Techniques and criteria for Judging Capacity and Sensitivity (CA 2002). 7.2.4 The Landscape Study sets out, in section 2.0, the methodology and criteria used for each aspect of the landscape being assessed, including the following: 1. Landscape Quality (this should be ‘condition’ if following latest LCA guidance as the term quality is now a discredited approach to assessing landscapes) 2. Landscape Value 3. Landscape Sensitivity 4. Visual Sensitivity 5. Landscape Capacity 7.2.5 In relation to the assessment of landscape capacity, capacity is defined in Topic Paper No.6: ‘Techniques and Criteria for Judging Capacity and Sensitivity’ as: ‘The degree to which a particular landscape type or area is able to accommodate change without significant effect on its character, or overall change of landscape character type. Capacity is likely to vary according to the type and nature of change being proposed’. 7.2.6 We have reviewed the Landscape Study, in particular, the methodology set out in the document and whether this has been consistently applied to form a credible evidence base suitable to inform the spatial strategy contained in the Core Strategy. 7.2.7 The review of the Core Strategy and other background material indicates that the Landscape Study has not followed the guidance in Topic Paper No.6. Topic Paper No.6 suggests that there are two approaches to assessing landscape sensitivity. These are: 1. Judging Overall Landscape Sensitivity and 2. Judging Landscape Sensitivity to a specific type of change. 7.2.8 However, in order to assess landscape capacity, the assessment of the sensitivity of different types or areas of landscape to the type of change in question must be combined with an assessment of the more subjective or perceptual aspects of the landscape and of the value attached to the landscape. 7.2.9 The stages for assessing landscape capacity of a landscape are set out in Section 3.0 of Topic Paper No.6 and reproduced in Figure 7.1 below. Figure 7.1: Stages for assessing landscape capacity Source: Landscape Character Assessment Guidance for England and Scotland, Topic Paper No.6: Techniques and criteria for Judging Capacity and Sensitivity (CA 2002) 7.2.10 Sections 5.0 and 6.0 of Topic Paper No.6 provide the more detailed considerations that need to be taken into account. 7.2.11 The boxed text, at paragraph 2.11.2 of the Landscape Study, follows the same assessment stages used to assess the landscape capacity to accommodate a specific type of change and given the local scale of the assessment work it is considered that this is the appropriate method to use. 7.2.12 However, Topic Paper No.6, at paragraph 6.5, also goes on to state that: ‘Capacity is all a question of the interaction between the sensitivity of the landscape, the type and amount of change and the way that the landscape is valued’. 7.2.13 Sections 2.11 and 2.12 of the Landscape Study set out the approach used by East Sussex County Council landscape group in undertaking the landscape study. However, the assessment does not define the quantum of housing development used to assess the capacity of each character area, nor is the LDF Core Issues and Options Consultation Paper July 2007 referred to as a guide to the quantum of housing development used to assess each of the different character areas. The Landscape Study does however state at paragraph 2.12.3 that: ‘an overall assessment can be made for each character area on the capacity to accept the type of change being considered. This judgement is made according to the combination of characteristics that contribute to a particular area of landscape. The capacity of an area to accept change is related to the potential of the area to accommodate development in a particular location without detracting from the overall character of that landscape. The capacity evaluation of each character area does not assume that this is the capacity across the entire character area’ 7.2.14 There are a number interrelated issues raised in the above paragraph which we now turn to. 7.2.15 In relation to the type of change, the Landscape Study defines, at paragraph 2.12.6, the assumptions used for the assessment business uses, i.e. the assessment of sensitivity / capacity is based on light industrial type uses which would be consistent with a residential environment and these would be single storey units. However the Landscape Study does not define the full details of the housing use, such as type (housing - single storey / two storey / three storey etc) or amount (large / medium / small scale development) and we contend that the details of the change being considered is not transparent from the Landscape Study, as although the type of change (i.e. housing) is known, the form and amount of housing is unknown. These are important factors when considering the landscape capacity of an area to accommodate development, especially if using the stages set in the Landscape Study. 7.2.16 A similar assumption to the business use (or range of assumptions) could have been used for assessing the impact of housing on landscape sensitivity / capacity of each character area. For example two to three storey houses at the following ranges: 1. small scale housing between five to 50 dwellings 2. medium scale housing development between 50 to 200 dwellings, and 3. large scale housing development between 200 to 500 dwellings. 7.2.17 In relation to the combination of the characteristics that contribute to a particular area, comments on these are made in later sections (See paragraphs 7.4.1 to 7.4.14 below). 7.2.18 The Landscape Study also refers to mitigation and management of the landscape (Section 2.13) and, in paragraph 2.13.1, it highlights that mitigation has been used to determine the visual and character sensitivity of the landscape. This approach does not accord with Topic Paper No.6 as mitigation should only be used to inform the visual sensitivity of the area assessed, (See Figure 7.1 above), and not directly the character sensitivity of an area (although visual aspects are one of the aspects that inform the character of an area). Mitigation in itself can have a significant effect on character and the landscapes capacity to accommodate development. In some cases mitigation would make an area less suitable to accommodate development not more suitable. Again this, we would contend, is a flaw in the assessment. The existing management of the landscape is relevant to determining the condition (or quality) of an area of landscape.
but the identification of management opportunities is not relevant to determining the capacity of the landscape to accommodate development. Management of the land could in itself bring about a change to the landscape which is discordant with its character, for instance managing the land to encourage woodland growth or planting extensive woodlands in a very open exposed landscape would lead to a significant change. 7.2.19 The methodology section of the Landscape Study also includes a part dealing with the Areas of Outstanding Natural Beauty (AONB) within the district. Section 2.14 refers to ‘AONBs and AONB Buffer Zones’ as a way of identifying higher value landscapes within Wealden. At paragraph 2.14.2 the Landscape Study states: ‘There is, in some areas adjacent to the AONB boundary a buffer zone to the AONB landscape. This is usually an area of similar character but not of the same quality as the AONB landscape and not covered by the same planning policy. Where relevant these areas are indicated in the figures’. 7.2.20 Paragraph 2.14.4, the Landscape Study goes on the state the following: ‘These buffer zones have been identified through the character area analysis. The relative sensitivity of these areas has been considered according to the landscape character to achieve a balanced comparison with AONB and AONB landscapes’. 7.2.21 The Landscape Study considers that there is support for this ‘buffer zone’ approach due to Policy EN2 (f) of the East Sussex and Brighton and Hove Structure Plan. We contend that this approach is flawed and unsound. Firstly, the Structure Plan has been superseded by the South East Plan and at the time of preparing the Landscape Study during the period August 2007 to February 2009, both East Sussex County Council and Wealden District Council would have been aware of the emerging South East Plan policies through the draft regional plan. Secondly, Policy EN2 (f) does not prohibit development but seeks to protect the Sussex Downs and High Weald AONBs and minimise the impact of development within them by requiring measures to integrate the development in to the landscape. Thirdly, there is no Government policy support for the concept of ‘AONB buffers’ in Planning Policy Statement No.7. Like Policy EN2 of the Structure Plan, PPS 7 does not prohibit development within the boundaries or adjoining an AONB but merely seeks to ensure that the landscapes within AONBs are considered carefully and appropriate measures taken to mitigate the harm that potential development may cause. 7.2.22 The fourth point is that, whilst the Council would seek support from Policy EN2 (f) as a way of ‘balancing the comparison between AONB and non AONB areas’ especially the areas of landscape close to the AONB boundary, the East Sussex and Brighton and Hove Structure Plan does not define the extent of the buffer zone on the Key Diagram nor is the extent of the buffer area set out in its explanatory text. We contend that the justification for this approach must be given very little weight. 7.2.23 Lastly, it is acknowledged that some areas of landscape within an AONB may be of poorer condition (quality) score and / or lower visual and character sensitivity than areas outside of the AONB but the adjustment in the landscape sensitivity / capacity scoring by introducing what appears to be an arbitrary AONB buffer zone seems to undermine the purposes and status of the AONB designation,(and its planning policy protection), by attaching increased value to a character area that adjoins the AONB which although it may be of a similar character, does not meet the quality criteria for inclusion within the AONB. In addition, it is noted that the Landscape Study has not been subject to peer review and there is no evidence that it has had stakeholder input / consultation with statutory consultees, such Natural England / High Weald AONB Joint Advisory Committee and other interested bodies to agree this approach to the AONBs. 7.2.24 The Study goes on to set out the method used to undertake a comparative evaluation of a potential development area within a character area which has capacity to accommodate development. This gives an early indication of sites which would be worthy of further consideration for development in landscape terms. We contend that the comparative assessment of character areas within the District is flawed as the starting point for the assessment the landscape sensitivity / capacity analysis is unsound for the reason given above. 7.2.25 Notwithstanding the above point, Section 2.15.4 of the Landscape Study states that: ‘Prior to coming to a firm view on the full potential and scope in these areas further investigation would be required’. 7.2.26 However, the Study does not present evidence of this further investigation or how preferred development areas have been chosen; for example there is no detailed assessment of the west of Uckfield area although this has been identified as a major urban extension area under Policy WCS4 - SD1. 7.3 Critical Review of the findings of the Landscape Study 7.3.1 The Landscape Study methodology sets out how each landscape character is to be assessed and the information recorded using landscape character assessment sheets (section 2.5) whilst section 2.17 of the Landscape Study refers to mapping which is split into two stages. Stage 1 relates to recording baseline information on each character area such as planning designation, Public Right of Way and key viewpoint, focal point, landscape features and detractors (which should be read with the assessment record sheets). Stage 2 relates to the identification of potential development areas with indicative boundaries and also identifies key woods, shaws, hedges, tree belts etc and also the potential for mitigation planting. 7.3.2 In order to assess the robustness of the landscape capacity study for the purpose of this representation, the area around Uckfield, Maresfield and Five Ash Down were visited and the baseline information recorded on the landscape assessment sheets checked and the judgements reached reviewed. This check revealed that that were a number of elements / features not recorded or identified for some areas and therefore these factors were not able to inform the judgement reached. 7.3.3 For example, ‘Maresfield Area A’, is described as: ‘An open, undulating landscape used for pasture to the west and pleasure to the east. It is ungrazed showing some scrub. Wide long views to the south. Surrounded on other sides by mature trees and exotic Eucalyptus and Cedars from nearby Park. Fine houses on outskirts and within site. Fine clumps of Pines. Some road noise adjoins picturesque recreation ground’. 7.3.4 The assessment sheet omits a number of important features such as areas of woodlands and plantations, (some of which are ancient woodlands and provide screening, containment and form visual barriers). Hedges, fences, footpaths and reference to the bypass were not recorded. The assessment sheet also
refers to parkland and that the majority of the land is amenity land lacking management. A wide long view(s) out to
the south is highlighted as a key feature which is correct when looking south from a small part of the area but
elsewhere views are contained and obscured by landform and vegetation. The record sheet includes a photograph
of the view south but this is not taken from the recreation ground as recorded on the map Figure 52. The
photograph was taken from private land on the footpath. 7.3.5 In the visual appraisal section of the assessment
sheet it records the local receptors as amenity land and houses, types of view as long views from top of ridge to
the south and visual barriers as landform / trees and hedges. It concludes that the sensitivity is high (see table 7.1
below). It is acknowledged that there are views within the area but these tend to be short partial or glimpsed views
with long views out towards the south from high ground in the north eastern parts of character area. Views into the
area are very limited and development within the area would have a minimal impact on views. However, in views
from the ridge to the south the recreation occupying the north eastern parts of the character area is seen whilst the
remaining areas are hidden from view and therefore the visual sensitivity of the majority of the area is low. 7.3.6
The resultant evaluation of this area was considered as follows: Table 7.1: Landscape Study Assessment,
Maresfield Area A Character Area Maresfield A Quality Good Value Medium Sensitivity to Change Moderate
Visual Sensitivity High Management Opportunities Mange hedges and grazing. Mange recreational spaces and
access to countryside. Need to retain gap between Maresfield and Uckfield. Potential for Mitigation LowPlanting
would change open character and obscure long views out from recreation ground Capacity to Accept Change:
Housing LowClose to village edge only Capacity to Accept Change: Business Low 7.3.7 We contend that the
record sheets are incorrect and the judgement on quality / condition is erroneous and should be ‘ordinary’ as most
of the land is unmanaged comprising rank grassland of little intrinsic landscape value and the visual sensitivity of
the area is ‘moderate or low’ due to the strong enclosure afforded to the area. It is interesting to note that one of
the management opportunities is to retain a gap between Maresfield and Uckfield although there is no planning
policy support for the retention of gaps in the Core Strategy or previous Non Statutory Wealden Local Plan.
7.3.8 By comparison, another example is Character Area L – land to the west of Uckfield, which is described as: ‘Land
sloping away from urban edge to Uck valley and A26 Uckfield by pass. Strong field structure with arable and
pasture. Some large fields. Sewage works detractors. Few focuses of character. Development would need a well
defined edge to prevent creep’. 7.3.9 The assessment sheet for this character area has recorded the land cover and
landscape elements correctly but has not recorded any landform features and relatively few aesthetic factors,
although it describes the land as sloping away from the urban edge with a strong field structure with arable and
pasture. The landscape condition is considered to be fair which is not defined in the methodology although this
changes to ordinary in the comparison table. 7.3.10 In the visual appraisal section of the assessment sheet it
records the local receptors as countryside on the other side of Uck Valley, isolated properties, footpaths and A26
and houses on the urban edge, types of view as views across to woods at West Park / Butchers Wood, wooded
ridge of Shortbridge across Uckfield Valley and visual barriers as few. It concludes that the sensitivity is ‘moderate’
(see table 7.2), Table 7.2: Landscape Study Assessment, Uckfield Area L Character Area Uckfield L Quality
Ordinary Value MediumSnaWAccessible for recreation Sensitivity to Change Moderate Visual Sensitivity Moderate
high on ridge Management Opportunities Manage urban fringe. Farm diversification pressure. Manage wood and
existing trees and hedges Potential for Mitigation ModerateLow on ridge as need to retain open fieldsSoften urban
edge. Create green network. Relocate recreation ground Capacity to Accept Change: Housing ModerateNeed well
defined boundaries close to urban edge avoid high ground Capacity to Accept Change: Business No capacity
7.3.11 We contend that the record sheets are incorrect and the judgement on quality / condition is under estimated
and should be ‘good’ as most of the land is attractive farmed landscape with some distinctiveness features with a
recognisable landscape structure. The assessment sheet ignores the open exposed nature of this character area,
with long views south and west and numerous views in to the area from the surrounding countryside (roads and
footpaths), and therefore the visual sensitivity of the area should be ‘high’ due the number of viewpoints where
views can be obtained. This can be compared to the Maresfield A area which is considered to have ‘high’
sensitivity rating but with a few vantage points available where development impacts will be perceived. 7.3.12 We
also note that under management opportunities it is considered that the area could contribute to managing the
urban fringe, which could equally apply to the land at Maresfield, and that under the potential for mitigation heading
is considered that the area has a ‘moderate’ ability, although the introduction of mitigate planting as shown Figure
11 of the landscape Study would dramatically and significantly change the landscape character of the area. 7.3.13
These examples illustrate the inconsistency of the landscape assessment record sheet and the arbitrary nature of
the judgements made. It does not give any confidence to the manner in which the Landscape Study has been
undertaken or to the transparent way that the judgements have been reached. 7.4 Implications for the soundness
of the Core Strategy 7.4.1 We have reviewed the ‘Landscape Character Assessment and Development Option
Evaluation Study’ of the district. It is not clear how this Landscape Study has been used to inform the spatial
strategy as it is not specifically referred to in the Core Strategy, nor is the Landscape Study listed as a background
paper at paragraph 1.7 of the Core Strategy (although it is included as a background paper on the Councils
website). 7.4.2 We have reviewed the methodology set out in the document and we have also reviewed whether
the methodology has been consistently applied resulting in a final report that is robust, thorough, and transparent
and that it would form a credible evidence base suitable to inform the spatial strategy contained in the Core
Strategy. The Study also includes a methodology employed to undertake a comparative evaluation of a potential
development area within a character area which has capacity to accommodate development. 7.4.3 The examples
referred to in our analysis above illustrate the inconsistency of the landscape assessment record sheets and
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arbitrary nature of the judgements made and it does not give any confidence to the manner in which the Landscape Study has been undertaken or to the transparent way that the judgements have been reached. 7.4.4 We contend that the Landscape Study is flawed and therefore the assessment of housing sites in the district, the spatial strategy and the Councils Sustainability Appraisal is unsound. In addition, in relation to the comparison assessment of sites within the district surrounding the towns and villages; we contend that this comparative assessment of character areas is flawed as the starting point for the assessment the landscape sensitivity / capacity analysis is unsound for the reason given above. 7.4.5 The Core Strategy proposes that the land to the west of Uckfield be identified as a ‘strategic development area’ suitable for accommodating 1,000 homes and some 12,650 sq metres net of employment floor space and education provision as an extension to the urban area to the west of New Town. In the light of the comments made on the Landscape Study, it is considered that this proposal be reassessed and, (taking into account the other representations made on other parts and policies contained in the Core Strategy), greater emphasis be given to the suitability of land at Maresfield to accommodate increased housing numbers and a larger proportion of the housing requirements for the district. 7.4.6 Policy WCS13 relating to Green Infrastructure is supported although it is considered that the anomalies and errors in the Landscape Study be addressed before this document is used to inform and guide the implementation of Green Infrastructure Strategy and also formulation of the specific measures for the protection and enhancement of the landscape which are to set out in the Delivery and Site Allocations DPD referred to at paragraph 7.28 of the Core Strategy. ’

Details of Changes to be Made:
SUMMARY 7.4.7 In conclusion, we contend that the Core Strategy is unsound because: 1. It is not justified as it is not based on a sound evidence base as the Landscape Study (Landscape Character Assessment and Development Options Evaluation Study of the District) is flawed and therefore the assessment of housing sites in the district, the spatial strategy and the Councils Sustainability Appraisal is unsound. It is not clear how the Landscape Study has been used to inform the spatial strategy as it is not specifically referred to in the Core Strategy nor is the Landscape Study listed as a background paper at paragraph 1.7 of the Core Strategy; 2. It is not justified because the Landscape Study as it is not robust, thorough, and transparent and that it does not form a credible evidence base suitable to inform the spatial strategy contained in the Core Strategy. The Landscape Study contains a number inconsistencies set out in the landscape assessment record sheets and contains a number of arbitrary judgements and so it does not give any confidence to the manner in which the Landscape Study has been undertaken or to the transparent way that the judgements have been reached. 3. It is not consistent with national policy as the methodology for undertaking the Landscape Study (which has been used to inform the spatial strategy) refers to ‘AONB and AONB Buffer Zones’ as a way of identifying higher value landscapes. There are a number of reasons why this approach is unsound but there is no Government policy support for the concept of ‘AONB buffers’ in Planning Policy Statement No.7 or any other policy guidance.

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<td>522137</td>
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<tr>
<td>Agent ID</td>
<td>Polegate Town Council</td>
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<td>WCS13 Green Infrastructure</td>
<td>Policy 13</td>
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</tbody>
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Sound ☐ Yes ☑ No ☐ Justified ☐ Effective ☐ Consistent with national policy

Legally Compliant ☐ Yes ☐ No

Details of Reasons for Soundess/ Legal Complaince:
WSC13 states ‘development proposals will not be permitted which would result in the loss of existing open space or harm to Wealden's network of green spaces unless measures are incorporated within the development that will either mitigate the effects of development or alternative and suitable provision is made that is accessible, of good quality and value to its users, in an appropriate location, at an appropriate scale and nature and would positively contribute to the overall network of green space.’

Details of Changes to be Made:
A development proposal is required which will address the issues of green spaces in Polegate. This area has always been seen as an important green gap between Polegate and Willingdon.
Details of Reasons for Soundness/ Legal Compliance:
Housing planning should be carefully controlled. Solar panels and water conservation schemes for rain water to be used as grey water mad a general feature in all new houses.

Details of Changes to be Made:

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Details of Reasons for Soundness/ Legal Compliance:
Housing planning should be carefully controlled. Solar panels and water conservation schemes for rain water to be used as grey water mad a general feature in all new houses.

Details of Changes to be Made:
Wealden is identified as being an area of ‘water stress’, as is the whole of the South East. Water stress is a blanket term for the whole region and variations have not been identified for specific districts or boroughs. This term is based on the rainfall being particularly low compared with the rest of the country and the population being particularly high. Paragraph 7.30 of your Strategy relies on Building Regulations to deliver water efficiency measures for new homes. The basic Building Regulations 2010 Part G currently requires a minimum design standard of 125 l/h/d, which is below the Code for Sustainable Homes Level 1 of 120 l/h/d. The Catchment Abstraction Management Plan however shows that there are two distinctions within Wealden taking into account human impact on available water. The central and northern sections of the District are classified in this document as being 'over licenced'. This means that the levels of current water abstraction results in there being no water available at low flows. If the maximum amount of water were to be abstracted to the current licenced limit, then there is potential for unacceptable environmental impact, particularly at low flows. The rest of the area is defined as having ‘no water available’. This means that there is no water available for further licencing at low flows, although it may be acceptable at high flows with appropriate restrictions. We are using this data to ensure that domestic water consumption is reduced by applying a minimum standard. Our position is that in the Southern Region, as a minimum requirement, homes built before 2016 should achieve internal water use of 105 litres/head/day (as required by Code for Sustainable Homes (CSH) level 3). Your strategy relies too heavily on Building Regulations to deliver water efficiency to 125 litres/head/day (l/h/d). We consider that the local evidence in the CAMS shows that there is a specific requirement to reduce water consumption further than national standards in Wealden and across the South East of England. You should reflect the local water scarcity issues in Wealden by including a policy to achieve 105 l/h/d. Should the Inspector require further evidence to consider this matter, we would be happy to provide a further statement.

Details of Changes to be Made:
Details of Reasons for Soundess/ Legal Complaince:

Please refer to comments in respect of Policy SP09. The Core Strategy fails to acknowledge that one of the key components in mitigating and adapting to climate change is minimising the use of water. Despite recognising that Wealden District is within an area of water stress, as identified by the Environment Agency, the Core Strategy does not include any policies that will impose water efficiency measures on new properties, instead recent changes to the Building Regulations that will restrict water usage are considered to be adequate. South East Water does not consider this to be the most appropriate strategy and therefore believes the Plan to be unsound. The amendment to the Building Regulations 2000 Part G: Sanitation Hot Water Safety and Water Efficiency approved in 2010 will indeed require increased water efficiency measures for new dwellings. It includes a ‘Water Efficiency Calculator’ to ensure the potential consumption of water does not exceed 125 litres per day. The standards within the Code for Sustainable Homes are much lower than those set out within the revised Building Regulations. The standards are as follows: Level 0 - Part G of the Building Regulations Levels 1-2 - less than 120 litres/person/day Levels 3-4 - less than 105 litres/person/day Levels 5-6 - less than 80 litres/person/day For private dwellings, currently the Code for Sustainable Homes is voluntary and it is only through Local Development Frameworks that lower limits can be imposed on new development. It is South East Water’s view, being within a water stress area, that it would be legitimate for Wealden District Council to impose more stringent limits for new property based on measures set out in the Code for Sustainable Homes. Indeed, most local authorities within South East Water’s area of responsibility have taken the opportunity to do this. If the Core Strategy does impose water consumption measures limits, it is also important that Wealden District also monitor and evaluate the effect of those limits in terms of the level of water efficiency that is achieved. This is important to water companies’ demand forecasting in terms of determining the actual sustainable levels of water efficiency savings that are achieved.

Details of Changes to be Made:
South East Water considers that it is appropriate and indeed essential for the Core Strategy to impose water consumption measures limits, in line with the Code for Sustainable Homes measures, for new development and monitor the effectiveness of any policy in reducing water consumption.

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Details of Reasons for Soundess/ Legal Complaince:

Housing planning should be carefully controlled. Solar panels and water conservation schemes for rain water to be used as grey water made a general feature in all new houses.

Details of Changes to be Made:
### Details of Reasons for Soundness/ Legal Complaince:

South East Water has significant concerns about the deliverability and therefore the soundness of the Core Strategy as it fails to acknowledge its responsibility and role in addressing potential water deficit issues within the District. The need to do this is compounded by the abolition of Regional Spatial Strategies, as set out below. South East Water welcomes the inclusion of the sections on water supply and water efficiency within the Infrastructure Delivery Plan (IDP) - Proposed Submission Document (February 2011) but considers that the issues are of such significance to Wealden District, both in terms of the existing population and future growth, that these need to be reflected within the main body of the Core Strategy and within its policies. As acknowledged within the IDP, Wealden District is within a severe water stress area and this is addressed within South East Water's Water Resource Management Plan (WRMP). The IDP references the measures set out within the draft Revised Water Resource Management Plan, including the development of further water winter storage in the Ouse catchment from 2020 and Bewl water dam raising, stating that, “Land use implications of additional water storage at these locations in due course subject to final adoption of the Draft Revised Management Plan”. The Secretary of State approved South East Water’s WRMP in December 2010 and the final version of the plan has now been published. The final plan is essentially unchanged from the draft revised WRMP in respect of the need for further water winter storage in the Ouse catchment and Bewl water dam raising. In respect of a water winter storage in the Ouse catchment, the WRMP says the following, “The company’s latest options appraisal modelling for the post 2020 period continues to identify a local winter storage reservoir as the preferred solution. The dWRMP identified a site at Clay Hill, north of Ringmer. Subsequent company-level modelling confirmed this to be the least cost and most sustainable long-term option on the basis of known information. However, other sites, in or close to the River Ouse catchment, could also meet the same need and could conceivably match or better the criteria used in the model. Whether this is the case can only be ascertained by further detailed studies which will be required to help formulate a proposal, prior to an application for planning or development consent, but which in themselves do not form part of this first stage, which is the separate WRMP process. The statutory process of an environmental assessment, which will be brought into play at that point, also requires consideration of possible alternatives. These will have to be identified and compared against a range of detailed planning and environmental policies set out in the statutory development plan and elsewhere.” What the WRMP confirms is therefore that there is a water supply deficit which will, more than likely, require the development of new water resources. South East Water readily acknowledge that further work to analyse alternatives is required but it is feasible that development may be required within Wealden District during the plan period up to 2030. South East Water is committed to working closely with the District Council in reviewing potential options. Similarly, increasing the output from Bewl Reservoir by raising the level of dam has also been retained within South East Water’s WRMP and is also part of Southern Water’s WRMP. Again, it is recognised that further investigation is needed to confirm the details of any proposal and to further consider alternatives. It is therefore essential that the potential need for water resource infrastructure is reflected within the Core Strategy and that there is sufficient flexibility to support any development that may come forward during the plan period. The imperative for this is even greater with the planned abolition of regional planning through the Localism Bill. South East Water had significant involvement in the regional planning process and had secured support for new strategic water resources within the South East Plan through policy NRM3. The broad policies contained within the South East Plan remain sound and have a substantive evidence base. In the absence of any regional policies, the Core Strategy needs to take forward these policies and should: • recognise that there is a demonstrable need for new water resource schemes and increased demand management to cater for water supply needs for current and future development and the protection of the environment; • provide a commitment that Wealden District will work with South East Water and the Environment Agency in assisting in the timely delivery of schemes; • state that sites identified for water resource schemes by water companies and the Environment Agency as being required to deliver necessary water infrastructure will be safeguarded and allocated. Without explicit policy support, as stated above, for water resource and demand management within the Core Strategy, it is South East Water’s view that the Core Strategy could fail to meet the challenges of climate change and that future growth could be hindered by potential water deficit issues.

### Details of Changes to be Made:

In order for the Core Strategy to be sound, the water demand and supply issues that face the District, as stated above, need to be directly addressed within the Plan and reflected in policy. The following policy should be incorporated into the Core Strategy: “New water resource schemes, improvements to the water supply network
and demand management measures that are needed to meet current and future water supply needs, meet the challenges of climate change and protect the environment will be supported. Wealden District will work with the water companies and the Environment Agency to assist in the time delivery of schemes. Sites that are identified for water resource schemes by water companies and the Environment Agency as being required to deliver necessary water infrastructure will be safeguarded and allocated within Development Plan Documents."
### Summary of all Representations - Proposed Submission Core Strategy Regulation 27 - Report 11th July 2011

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<th>Details of Reasons for Soundess/ Legal Complaince:</th>
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| 311               | Mr Hatfield | 102470 | Proposed Urban Extension in North & East Hailsham Planning Policy Statement 1 (PPS1), states that: ‘In preparing development plans, planning authorities should seek to: Reduce the need to travel... and focus development in existing centres and near to major public transport interchanges.’ The urban extension to north Hailsham (SD3) identified in the Figure 7 of the Proposed Submission Core Strategy (PSCS) is 1.95 km from the centre. Although the southern sections of the east extension (SD2) would be close to the town centre the northern sections would be approximately 2.2 km from the town centre. In contrast, southern sites identified as being suitable in the SHLAA (in particular Oaklands & The Brickfield SHLAA Ref 100/1310) are located 1.2 km from the town centre. This shorter distance means that trips into the town centre are much more likely to be undertaken on foot or bicycle rather than in a car. On this basis, the proposed residential development to Hailsham as identified in Figure 7 for the PSCS is contradictory to PPS1. This point was also highlighted by the Strategic Housing Land Availability Assessment. The site at Danecroft Nursery, Station Road, Hellingly and adjacent site at 13 Station Road, Hellingly are both within the north extension (SD3), and were deemed to be unsuitable for development by the SHLAA. This was because as stated; ‘These sites are relatively isolated and are remote from local services and facilities. They are disconnected from the boundary of Hailsham which is some distance away. Housing development would be unsustainable and would have the effect of consolidating a linear form of built development in this semi-rural location.’ PPS 1 states that; ‘In some circumstances, a planning authority may decide in reaching a decision to give different weight to social, environmental, resource or economic considerations. Where this Is the case, the reasons for doing so should be explicit and the consequences considered.’ The various studies undertaken in preparation for the PSCS do not address this issue. No compensatory positive reason is given for the location of development so removed from the town centre. The evidence base study; ‘Landscape Character Assessment and Development Option Evaluation Study’ undertaken in 2009 in preparation for the PSCS states that; ‘Development of the northern fringes of Hailsham would be north of the A271 and isolated from the town....’ The isolated nature of this development which is removed from the town centre of Hailsham contradicts guidance in PPS1. PPS1 states that Planning Authorities should; ‘ensure that the impact of development on the social fabric of communities is considered and taken into account’. Hailsham is more able to accommodate smaller sites to the south than larger sites to north and east. Flood Risk According to Figure 7 of the PSCS, sites identified to the north of communities is considered and taken into account’. Hailsham is more able to accommodate smaller sites to the east of Hailsham (SD2 and SD3) are positioned alongside a flood prone area. The Strategic Housing Land Availability Assessment (SHLAA) also points out that; ‘the eastern side of the north site are within Flood Zones 2 & 3’. PPS 1 states that ‘new development should be avoided in areas at risk of flooding’. Strategic Gap Section 3.10.7 of the ‘Landscape Character Assessment and Development Option Evaluation Study’ states that; ‘The countryside to the south of Ersham Road and Ingrams Way is more enclosed and has a stronger character than areas to the east. This is the strategic gap between Polegate and Hailsham and should be protected to prevent coalescence.’ The land south and west of Ersham Road is associated with previous use as a brickfield. There are a number of existing residential developments dotted around this area with the predominant use of the land being for horses and riding. There is existing residential development adjacent to the B2104 (Ersham Road) which is further south than southern sites identified as being suitable by the SHLAA. Development at this location would provide infill between this isolated area of housing and the existing south urban fringe of Hailsham. There is also additional existing development south of this site adjacent to the A22 (Woodside Way). It is therefore not accurate to say that development south of Ersham Road and Ingrams Way would reduce the strategic gap between Hailsham and Polegate. There is currently a gap of 2.5 km between the south side of Oaklands Farm & The Brickfield and the north edge of Polegate. This is a considerable distance. The proposed development of the northern sites such as those identified in Figure 7 of the PSCS would mean that the historic village of Hellingly would effectively become engulfed by Hailsham. Referring to the Hellingly Hospital site; Section 4.9.2 of the Landscape Character Assessment and Development Option Evaluation Study’ states that: ‘The consideration of this area as a new settlement should avoid coalescence between the settlements at north Hailsham and the village of Hellingly..... A new community in this area would need to include the areas to the north of Upper Horsebridge.’ Since the north extension (SD3) identified in Figure 7 of the PSCS would be located 350m from Hellingly, it seems clear that coalescence would occur between north Hailsham and the village of Hellingly. This seems to be a blatant contradiction to the aims of the Landscape Character Assessment and Development Option Evaluation Study. BP1: ‘Development of the Proposed Submission Core Strategy’ Document BP1:’Development of the Proposed Submission Core Strategy’ – February 2011’ section 8.21 refers to south sites indentified in the SHLAA as: ‘area with rural character compared to other broad locations. The access to the town centre, and the proximity..."
of the A22 would not provide a suitable alternative to car use, and compared to other broad locations would not benefit the town centre and the wider population to such degree.’ This assessment is not accurate. Access to the town centre from the identified south sites is superior to that of the north sites identified, with an existing bus stop located on the adjacent B2104 providing regular 3 minute shuttles directly to the town centre. The south sites are significantly closer to Hailsham town centre (1.2km rather than 2.2km) than the north sites identified in the SHLAA and increase the likelihood that this journey would be taken by bicycle or foot. Section 8.24 of Document BP1 provides an assessment of the north sites identified in the SHLAA, stating: ‘In order to maximise the use of existing waste water capacity the strategy is directed to north Hailsham.’ The SHLAA contradicts the above, stating that the northern site at Upper Horsebridge, Hailsham for 520 dwellings is currently not deliverable due to the current wastewater capacity constraints at Hailsham North Wastewater Treatment Works. With reference to the north site, Section 8.24 of Document BP1 goes on to state: ‘It is less sensitive in terms of landscape impact, provides an opportunity to consolidate development at Hellingly Hospital and has the necessary road linkages and ability to create mixed housing and employment areas. Provision of services in this location will not detract from the town centre and will help provide for the wider area, and allows for the provision of additional primary school places.’ The assessment states that development at this site would be less sensitive in terms of landscape impact despite being adjacent to the historic village of Hellingly containing several listed properties. It is also contrary to the Assessment made in 2001 in the then Local Plan Review Landscape Appraisal. Conclusion The PSCS has been prepared using flawed evidence base studies such as BP1: ‘Development of the Proposed Submission Core Strategy’ and the ‘Landscape Study’. The use of such studies has meant that the PSCS has not been able to provide the most appropriate strategy for development of sites surrounding Hailsham. The PSCS is not consistent with national policy document PPS1 in that the proposed residential development at Hailsham is not positioned close to the town centre and existing facilities. The Council has not been able to provide clear and convincing reasoning to justify the approach of positioning development to the North of Hailsham which is isolated from the town centre and does not comply with PPS1. The Oaklands and Brickfield site south of Hailsham (SHLAA 100/1300: 224 dwellings) is largely on previously-developed (brownfield) land and has a highways scheme to be paid for by the developers agreed with East Sussex County Council and should be included in the SDAs to the exclusion of less suitable development. It meets the Hailsham Sustainability Objectives, being a local Urban Extension within walking distance of Hailsham town centre and offering proximity to open space, woodland and biodiversity – at a scale capable of delivering up to 224 dwellings with minimum impact on infrastructure and environmental amenity.  

I have examined the Proposed Submission Core Strategy (PSCS) against the Soundness Tool and found it wanting in terms of justification and effectiveness. The PSCS is a carefully prepared document, well thought out to offer a plan for the future but it does not take full account of the background research and documentation upon which it is based. In particular the proposals to expand Hailsham to the north do not comply with the sustainability or infrastructure objectives for Wealden and the proposals for development to the east and north of Hailsham are contrary to previous WDC research and to current Background Papers. Participation The consultation process has permitted all interested parties to engage but the options for answering have been strictly limited on a Yes or No basis when, in fact, more discursive answers are needed. Research/Fact Finding The content of the PSCS is not justified by the evidence, particularly in respect of infrastructure and especially highways and sewerage. Document No 7 Infrastructure Position Statement dated July 2009 refers under (A) Transport to the need to reduce travel distances. The PSCS shows strategic development to North and East Hailsham and towards Hellingly at distances from the town centre of up to 2.2 km. The South Wealden & Eastbourne Transport Study (SWETS) in paragraph 3.29 makes it clear that development for major housing allocations in north and east Hailsham would cause significant traffic pressure. Fewer pinch points and reduced traffic pressure are shown for development south of Hailsham. BP No 11 Infrastructure Delivery Plan defines the highways issue for development to the north and east as ‘CRITICAL’ and states ‘Development is contingent on delivery of this infrastructure’. Regarding sewerage/waste water capacity, as outlined in BP No 11, Hailsham North wastewater works had a consented discharge capacity at 1st Jan 2007 at 2900 dwellings. Hailsham South wastewater works had a capacity of 2400 dwellings at same date. This same document shows infrastructure developments in the Appendix for the North water treatment works is deemed CRITICAL to deliver 1500 dwellings. In the south of Hailsham ‘A scheme is not necessary to deliver the proposed Submission Core Strategy. However a scheme may be required for windfalls of housing and employment development.’ The same Background Paper states under ‘Further Supporting Evidence’: ‘Infrastructure is not necessary to achieve the full allocation of development in Hailsham, Polegate and Stone Cross as shown in the proposed Submission Core Strategy.’ This reliance on ‘massing’ in the north of Hailsham therefore has infrastructure issues which could be avoided by reducing the size of the Strategic Development Areas and spreading the housing to the south of the town. According to the Housing Needs Assessment the greatest number of low income families are located to the south and such development would help to balance with Affordable and mixed housing. The Table at the end of BP 11 sets out water treatment for extant Planning Permissions and completions from April 2006-April 2010 and states that there are capacity issues arising in the north from the Spatial Strategy but not in the south. The Conclusions to BP 11 state that wastewater funding has been secured from Offwat for works in 2012 to increase capacity in the Hailsham area and to undertake a study to investigate other technical solutions. The financial solution would be via appropriate developer contributions. In summary, therefore, according to BP11 there are no capacity issues in South Hailsham providing development is not beyond 2400 houses, less 885 already approved – namely 1515 dwellings in Polegate, Stonecross and South Hailsham. The Oaklands/Brickfield SHLAA site 100/1310 (224...
dwellings) includes an East Sussex County Council approved road scheme to allow capacity for up to 300 dwellings. Landscape In January 2001 WDC prepared the ‘Low Weald Towns Sector Appraisal Landscape’ as part of the Background Papers for the then Local Plan Review. This document is partly incorporated in Background Paper No 6 Green Infrastructure. BP 6 does not include the following relevant paragraph about the landscape around Hailsham: ‘South of Hailsham: ….Urban Influence: On the western side of the sector the urban edge of Hailsham is generally well concealed by woodland often in deep ghyls or valleys. Scattered farms and houses are linked by a network of roads and lanes, the latter often sunk between high overgrown hedges. Horse grazing is common, a reflection of urban pressures, and as a result many of the pastures have the unkempt rather untidy appearance of paddocks. Rough sheds, water troughs and other paraphernalia are common place. ‘. Under the heading ‘Sensitivity to Development’ the Landscape Appraisal states: ‘The relatively open aspect of the landscape east of the Cuckmere flood plain makes it sensitive to change by new development and any large scale expansion of the built form beyond the existing urban edge of Hailsham in this location would tend to damage the rural setting of the town. ‘. ‘However there is very little scope for additional development on the western edge of the sector without threatening the intrinsic qualities of the landscape and more particularly the rural settings of Hellingly and Horselunges Manor. Importantly the urban influence of Hailsham is hardly noticeable in this reach of the Cuckmere valley apart from some ribbon development along the A271 on the immediate fringes of the town. Any significant expansion of the built form in this location (Hellingly/North Hailsham) would be likely to erode the historic landscape, structure and rural character of this valuable landscape and irreparably damage the vulnerable gap of countryside between Hailsham and Hellingly.’ The Sustainability Appraisal sets out on p 42 the Sustainability Objectives for Wealden. The environmental objectives include: 7. ‘To make the most efficient use of land by prioritising brownfield sites for development, the re-use of existing buildings and promoting higher development densities.’ 11. ‘To conserve, enhance and make accessible for enjoyment the District’s countryside (in particular protecting the best and most versatile agricultural land) landscape, historic and built environment.’ 12. ‘Reduce the need to travel by car and promote alternative methods of transport.’ Development north and east of Hailsham is contrary to all or most of these objectives because it would increase travel distance, increase reliance on motor cars and damage the landscape and countryside, being on greenfield sites. SHLAA site 100/1310 Oaklands & The Brickfield are on a previously developed site, the Brickfield being defined as ‘Brownfield’. Oaklands, being used for business ‘horsey culture’ and not agriculture is also classified as ‘brownfield/previously developed’ under PPS3. Development of these sites south of Hailsham therefore complies with the environmental objectives set out in the Sustainability Appraisal. Alternatives The Council’s chosen approach in the PSCS is therefore not the most appropriate given the reasonable alternatives and it goes against the Background Papers and existing evidence base. It would appear from the PSCS that sustainability considerations have not informed its content from the start. In particular, it is stated at Para 6.30 of the PSCS that the Polegate, Willingdon, Stonecross development of 700 dwellings can only take place when formal road infrastructure is in position. Therefore SD4 is not programmed to start until 2019/20. Similarly, Para 5.16 states that the proposed northern urban extension of Hailsham (SD2 & SD3) cannot occur without infrastructure improvements namely sewerage and roads. Hence SD2 cannot start until 2017 and SD3 until 2021. I would submit that this issue of roads indicates that, by definition, the Strategic Development Areas forming the northern extension of Hailsham towards Hellingly and those in Polegate, Willingdon and Stone cross are unsustainable. The PSCS was initially prepared in its Draft and Consultation forms on the basis of the requirements of the South East Plan. This is now being abandoned and will no longer be valid. Because the Draft Core Strategies and most of the evidence gathering and Background Papers were prepared in accordance with the South East Regional Plan, the current PSCS is probably invalid and I would submit that the Inspector should examine this. Delivery The Council has correctly identified the main issues that the PSCS is seeking to address but does not present a clear vision for Wealden District into the future, only the equivalent of a ‘wish list’ of construction of 400 houses a year and sufficient commercial development for employment. It does not clarify how to achieve this, particularly in respect of infrastructure. The major strategic development north and east of Hailsham introduce an unacceptable risk in the ability to provide the infrastructure. Cross boundary issues have not been adequately addressed. In particular with Mid Sussex District Council and associated County Council Highways liaison for a relief road around East Grinstead. Nor does it address the problems of coalescence between Polegate, Willingdon and Stonecross and Eastbourne Councils, nor does it address the cross boundary issues which will arise with Lewes District Council, particularly in connection with development around Uckfield. The PSCS sets out objectives in terms of construction and development but does not connect these in sufficient detail with the necessary infrastructure. The most obvious gap in the policies is related to transport, in that the entire PSCS is predicated on continued and developing use of motor vehicles, there being no positive action proposed in relation to the Uckfield-Lewes Railway line and only passing mention of the possibility of public transport or reinstated railway from Hailsham southwards to Polegate and Eastbourne. The timescales given in the Plan are governed by the moribund South East Plan and are not realistic, particularly in respect of infrastructure provision and especially given the proposals in the PSCS for development north of Hailsham which will rely on the motor car. This is contrary to Spatial Planning Objective 7. Currently the Strategic Development Areas SD2, SD3, SD4, SD6 & SD7 are all undeliverable as set out in Paras 3.16, 6.19 & 6.31 due to lack of existing highways infrastructure. This amounts to 2650 dwellings which cannot be delivered. Flexibility It is not clear whether the PSCS will be flexible enough to respond to a variety of, or unexpected changes in circumstances, whether environmental, political or economic. Currently there is no clear plan for updating it. It cannot be very flexible because of the infrastructure constraints in Wealden District. Summary The PSCS does not
explain how its key policy objectives will be achieved because it is based on the South East Plan which is being abolished. Most of the supporting documents are also based around the South East Plan and pre-date its abolition. The proposals for Strategic Development housing north and east of Hailsham and in Polegate, Willingdon & Stonecross are all undeliverable because of lack of highways infrastructure and, in the north, due to lack of sewerage capacity. These proposals therefore contradict Wealden’s own sustainability and environmental objectives. The PSCS does not take proper account of some sites in the SHLAA which are recognised as suitable and which meet sustainability objectives better than those selected for ‘Strategic Development’. The Oaklands and Brickfield site south of Hailsham (SHLAA 100/1300: 224 dwellings) is largely on previously-developed (brownfield) land and has a highways scheme for the Ersham Road roundabout agreed with East Sussex County Council and should be included in the SDAs to the exclusion of less suitable development. It meets the Hailsham Sustainability Objectives, being a local Urban Extension within walking distance of Hailsham town centre and offering proximity to open space, woodland and biodiversity – at a scale capable of delivering up to 224 dwellings with minimum impact on infrastructure and environmental amenity. This PSCS has given careful consideration to the issues within the Wealden area but falls short of achieving deliverability because of a decision to favour massing over locality, with all the consequent risks involved in reliance on a minimum number of SDAs and with an intention to release more greenfield sites than is compliant with government recommendations. I welcome the Review and monitoring procedures inherent in the PSCS but this document is currently unsound.

Details of Changes to be Made:
The Strategic Developments proposed by Wealden District Council for North and East Hailsham and Polegate, Willingdon & Stonecross all depend on critical roads infrastructure and critical sewerage infrastructure north of Hailsham. These Strategic Developments are therefore not deliverable and there is a major risk that this Core Strategy cannot be implemented. This could be resolved by adding smaller urban extensions, particularly around the south of Hailsham where there are much reduced infrastructure constraints and one site would be Oaklands & The Brickfield (SHLAA site 100/1310).

Details of Reasons for Soundness/ Legal Complaince:
We support the Legal Compliance and Soundness of the Core Strategy. We support its development objectives.

Details of Changes to be Made:

Representation ID
731
Person ID Mr Clarke MSc
Agent ID Bluebell Railway Plc
Key Diagram
Sound ☑ Yes ☐ No ☐ Justified ☐ Effective ☐ Consistent with national policy
Legally Compliant ☑ Yes ☐ No

Details of Reasons for Soundness/Legal Complaint:
It is recommended that the larger Key Diagram map should indicate the location of the Bluebell Railway and include a notation, perhaps by dotted line, of the safeguarded route of the Uckfield to Lewes railway within the District Council's boundary.

Details of Changes to be Made:
Key Diagram 10

Details of Reasons for Soundess/ Legal Complaince:

Key Diagram and Errata dated 24 February 2011 – SUPPORT 2.52 We support paragraph 3.1 of the Errata to the Proposed Submission Core Strategy dated 24th February 2011. This amends a factual discrepancy between Figure 5: Phasing of Development (p31) of the Core Strategy and the Key Diagram which currently states ‘commencement around 2022’. 2.53 Whilst we support the overall strategy for Heathfield, we consider the Key Diagram is misleading and could result in an element of confusion. Currently, the wording for SD11 ‘urban extension to North West of Heathfield’ sits between two arrows relating to ‘wide AONB and views from ridge top’. We consider these two statements, i.e. the long distance views, and the potential for development, appear contradictory to each other on the Key Diagram. 2.54 We consider long distance views also exist to the South and West of Heathfield as well as areas in Crowborough and Uckfield as identified in the Landscape Strategy (paragraphs 3.1.4 (Crowborough), 3.4.5–3.4.7 (Heathfield) and 3.7.5 (Uckfield). Landscape arrows have not been provided in the Key Diagram in these locations and represent an inconsistency within the Key Diagram between settlements. We would recommend the Council to reconsider how this information is presented in order to avoid any confused messages the Key Diagram could present without reviewing the associated CS text.

Details of Changes to be Made:

Representations ID
1425

Person ID Mr Harper
104179 Summertree Estates Ltd

Agent ID Mr Wilford
339545 Barton Willmore

Key Diagram 10

Sound ☑ Yes ☐ No ☐ Justified ☑ Effective ☐ Consistent with national policy

Legally Compliant ☐ Yes ☑ No

Details of Reasons for Soundess/ Legal Complaince:

Key Diagram and Errata dated 24 February 2011 – SUPPORT 2.52 We support paragraph 3.1 of the Errata to the Proposed Submission Core Strategy dated 24th February 2011. This amends a factual discrepancy between Figure 5: Phasing of Development (p31) of the Core Strategy and the Key Diagram which currently states ‘commencement around 2022’. 2.53 Whilst we support the overall strategy for Heathfield, we consider the Key Diagram is misleading and could result in an element of confusion. Currently, the wording for SD11 ‘urban extension to North West of Heathfield’ sits between two arrows relating to ‘wide AONB and views from ridge top’. We consider these two statements, i.e. the long distance views, and the potential for development, appear contradictory to each other on the Key Diagram. 2.54 We consider long distance views also exist to the South and West of Heathfield as well as areas in Crowborough and Uckfield as identified in the Landscape Strategy (paragraphs 3.1.4 (Crowborough), 3.4.5–3.4.7 (Heathfield) and 3.7.5 (Uckfield). Landscape arrows have not been provided in the Key Diagram in these locations and represent an inconsistency within the Key Diagram between settlements. We would recommend the Council to reconsider how this information is presented in order to avoid any confused messages the Key Diagram could present without reviewing the associated CS text.

Details of Changes to be Made:

Representations ID
1742

Person ID Mrs McKeown
521906 Hallam Land Management Limited

Agent ID

Key Diagram 10

Sound ☐ Yes ☑ No ☑ Justified ☑ Effective ☑ Consistent with national policy

Legally Compliant ☑ Yes ☐ No

Details of Reasons for Soundess/ Legal Complaince:

Objection

Details of Changes to be Made:

That all of the phasing provisions are deleted.