



Subject	Wealden District Council Core Strategy: Examination in Public Matter 1: SPATIAL STRATEGY (WCS1, WCS2, WCS3)
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On behalf of	David Wilson Homes

Main Issue: Whether the overall spatial strategy is soundly based, presenting a clear spatial vision for the district in accordance with national and regional policies.

- a) Does the Core Strategy contain an appropriate spatial vision and objectives for the District?
1. The vision is not appropriate as it does not promote growth to meet and respond to the needs of existing and future residents and households. The implementation of the vision and the spatial distribution of growth and development as reflected through the strategic objectives and policies are thus inappropriate.
 2. In particular, Spatial Objective 3 (SPO3) significantly underplays the housing potential for the district. It does not reflect the evidence base. Para 1.32 of the Council's Housing Market Assessment (2007) states 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'*. The Core Strategy does nothing to relieve this pressure: indeed, it exacerbates it.
 3. Policy SPO3 states that growth should not be limited in villages if it can be demonstrated that growth will have a benefit / is sustainable. But the Council have instead constrained growth in the villages. Limiting growth to low figures will not help these villages to be sustainable and provide for affordable housing. This is a particular issue in Wealden where almost half of the population live in rural areas dispersed across the district. The vision does not adequately reflect the spatial character of the district nor the needs of its rural population. Our response to Matter 2 discusses this in length.
 4. We note in our representations to the Core Strategy that Maresfield can and should be identified as a location for growth in the Core Strategy. But the Core Strategy caps the housing figure at just 50 units for Maresfield. This equates to 2 units per year over the life of the Core Strategy. How can that possibly be a vision for growth and sustainability? And how will it ensure delivery of affordable housing? How can the delivery of average of just 2 units per annum be considered flexible?



- b) Do the policies in the Core Strategy reflect the identified spatial vision and objectives?
5. No. The Core Strategy constrains housing growth. There is no relationship between the evidence base and the vision for housing delivery. There is no empirical evidence that supports the Council's figure of 400 units per annum. There is no evidence for a figure of just 9,600 units over the plan period. The requirement is for a much higher housing figure in the district. This is discussed in more detail in Matter 3.
 6. The delivery of affordable housing is not appropriately or clearly reflected in the quantum of development allocated to the villages: limited development in the villages will not allow enough affordable housing to come forward to meet objectives for a mixed and balanced community, with development meeting the needs of all, as set out in SPO3.
- c) Have reasonable alternatives to the overall spatial strategy been considered?
7. No. Previous iterations of the Core Strategy were based on the SEP growth requirements and policy approach in that. The submission Core Strategy establishes a housing figure of 9,600 units for the period 2001 – 2030. There has been no consultation of alternative spatial options based on this level of growth.
 8. Following the 'Dear Chief Planner' letter in July 2011 the Council took the decision to revert to tier 1 housing figures (see section 2 of our representations to the Core Strategy). The associated spatial strategy for this does not follow from those previously consulted upon, considered and assessed. It is not clear how the social and economic aspects of a reduced housing figure have been assessed through the SA process (see section 6 of our representations). It is not clear how the spatial distribution of growth (homes and employment) relates to the evidence base, which was prepared for a Core Strategy that was initially being developed in line with the SEP.
 9. It is clear that housing delivery is constrained in the south of the district by a combination of infrastructure and environmental matters (see for example Background Paper 1 to the Core Strategy and our response to Matters 14 and 15). But this should not be a reason for constraining housing across the district as a whole. The preferred strategy should have considered the potential for redistributing growth and development in the district, with greater emphasis given to the north. It is not clear that this has been considered. At the very least, housing delivery should be focused on the north of the district in the early years of the plan. This will then provide the flexibility for infrastructure constraints to be overcome in the south of the district in the longer term.
 10. Housing delivery should not be constrained across the whole of the district because of infrastructure constraints in the south – particularly as there is no guarantee that these can be overcome. So, development should



come forward in the north of the district early on, and in advance of overcoming any infrastructure issues in the south, and flexibility should be built into the Core Strategy which allows for more development to come forward in north.

11. Maresfield, in the north of the district, has the potential to accommodate more growth than allocated in the Core Strategy (50 units) and indeed, far higher levels of growth were explored in both the 2007 Issues and Options Core Strategy (up to 500 homes) and the 2009 Spatial Options Core Strategy (up to 150 homes). Maresfield is not constrained in the way many other parts of the district are: it is not in the AONB or the floodplain; there are no landscape constraints; it has local facilities, sports and leisure provision; and permission exists for the Ashdown Business Park, which will provide a significant supply of employment opportunities. Maresfield is located within the 7km catchment around the Ashdown Forest, but land has been identified and is available for the delivery of SANGS. Significantly, responses to the 2007 Core Strategy Issues and Options document showed that more people were in favour of the scale of growth proposed than against (see section 2.4 of our representations).
 12. Para 5.23 of BP1 states that there is a clear need to meet affordable housing needs, with accompanying employment provision. Maresfield is an ideal location. The Ashdown Business Park will generate a significant number of jobs. Balancing these with homes is an important policy criteria. And even if the total workforce population of the borough was to remain static, BP1 states at paragraph 5.35 that employment growth is necessary to reduce out-commuting. Again, this points to Maresfield, with very real housing and employment opportunities, as being a good location for development.
- d) Is there a clear audit trail showing how and why the preferred strategy was arrived at?
13. No. As noted above, consultation on the 2007 and 2009 versions of the Core Strategy was based on different levels of growth and spatial approach (see sections 2 and 4 of our representations). There is no clear link between these and the submission draft, and thus no clear justification.
- e) Is the overall strategy sufficiently flexible to respond to an unexpected change in circumstances?
14. No. What happens if infrastructure constraints limit growth in south of district? Where should the housing then go? What happens if strategic SANGs cannot be delivered to mitigate impacts of these developments which cannot provide suitable SANGS onsite?
 15. There is no contingency in the Core Strategy. Background Paper 2 sets out how the under or over provision of housing supply will be managed.



Although the Core Strategy notes that it will deliver ‘at least’ 9,600 homes over the plan period, this acknowledgement of the targets as a minima will not be sufficient to address the scale of difference between the Core Strategy housing allocation and actual levels of need / demand. BP2 states at paragraph 10.34 that between 10-20 percent over provision maybe considered acceptable, but anymore and phasing will be slowed down. This only amounts to between 40 – 80 units a year over the 400 planned for in the Core Strategy. This is effectively a maximum figure that the Council would allow to come forward in any one year, but this is still below the SEP housing figures (550 per year).

16. In terms of under provision, the Council notes (paragraph 10.38 of BP2) it will work with partners to overcome obstacles and to adjust the phasing of sites. This is very general and aspirational. It doesn’t adequately address concerns about infrastructure delivery though. Background Paper 11 raises doubts about the delivery of critical infrastructure in the first five years of the plan and, even if delayed until after this, there is still no realistic prospect of delivery (see our response to Matter 15).

Summary Response

What part of the CS is unsound?	Spatial Strategy (WCS1, WCS2, WCS6)
Which of the soundness criteria it fails to meet	Not justified
Why it fails	Level of housing too low and not appropriately distributed
How the CS can be made sound	Increase housing: the SEP figures should be used as a minima, and more housing allocated to the north of the district
The precise change / wording sought	n/a