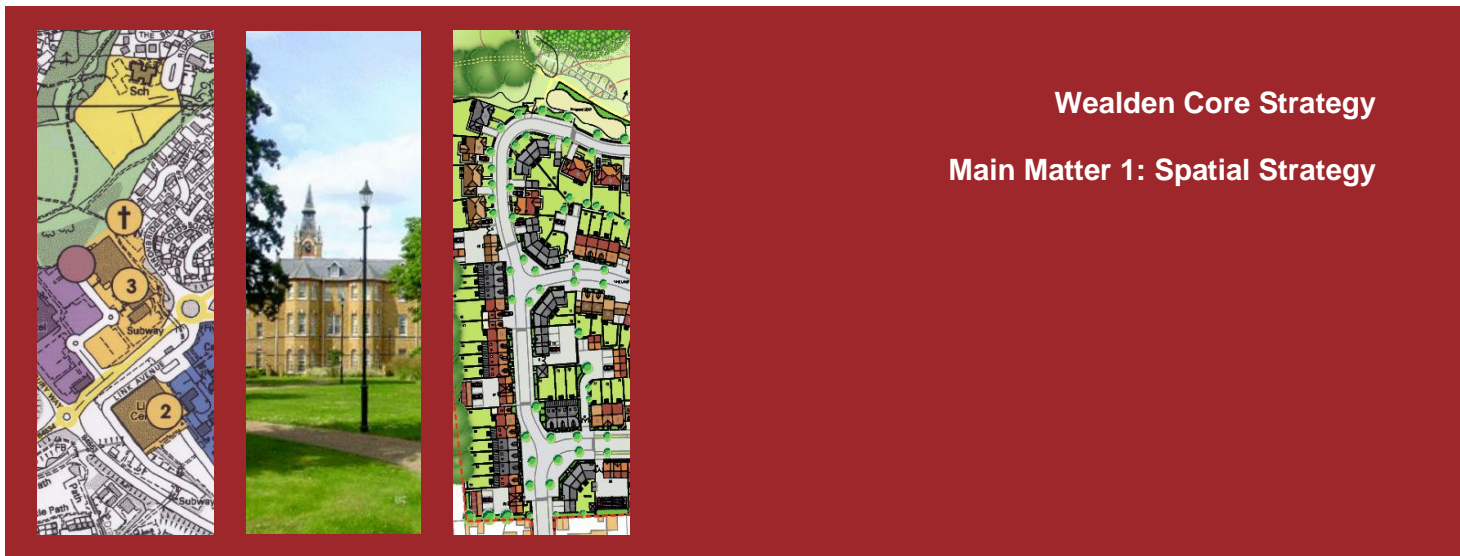




Gallagher Estates / Heron Land / Persimmon Homes – Matter 1 - 107752



Wealden Core Strategy
Main Matter 1: Spatial Strategy

**Submitted on behalf of Gallagher Estates Ltd,
Heron Land Developments and Persimmon Homes South East**

December 2011

10.160

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SECTION ONE – INTRODUCTION

- 1.1 These representations have been prepared by Boyer Planning Limited on behalf of our clients, Gallagher Estates Ltd, Heron Land Developments and Persimmon Homes South East, in relation to Matter 1: Spatial Strategy of the Wealden Core Strategy Examination, to be held on 17th January 2012.
- 1.2 Our clients have submitted representations in respect of the Proposed Submission Core Strategy and have now instructed us to represent them through participation in the Examination process and the submission of representations upon relevant matters.
- 1.3 Our representations to the Core Strategy are directly relevant to the list of matters to be examined, and this statement specifically addresses the questions that have been raised that are relevant in the context of our representations along with applying these to the tests of soundness as most recently amended within PPS12.
- 1.4 On behalf of our client we are also submitting representations in respect of Matter 3: Housing and Matter 6: Uckfield Area Strategy.
- 1.5 In respect of the Tests of Soundness, we consider that, whilst the broad locational strategy of the Core Strategy is sound, some significant amendments should be made in respect of specific policies to improve the soundness and clarity of the document. We expand upon these points in our response to the various questions which have been raised by the Inspector. In particular we consider that amendments are required to objective SPO3 and that policy WCS1 is unsound as it is not justified or effective and a higher housing target should be introduced. It is also considered that SD1 is not a sound proposal, and that only following further investigations should it be included as an allocation with a substantial reduction in the number of dwellings to a figure that reflects certainty of the deliverability of that number. In turn we consider that there are alternative sites, and in particular our clients' land at Bird in Eye South, that should be included as a strategic allocation. These points are expanded on in our hearing statements in relation to Matters 3 and 6 on which we are also responding and appearing at the Examination of.



1.6 We set out our response to the questions in Section Two. Our comments have regard to national planning guidance and other material considerations.



SECTION TWO – MATTERS TO BE EXAMINED

2.1 Does the Core Strategy contain an appropriate spatial vision and objectives for the District?

2.1.1 It is considered that the Core Strategy contains an appropriate spatial vision for the District which clearly expresses the aspirations of the Council. The spatial planning objectives expand on the spatial vision and provide more detailed guidance as to how the Council will seek to achieve its vision. Whilst we in general consider the objectives to be appropriate and likely to be successful in achieving the vision we raise issue with elements of SPO3.

2.1.2 SPO3 establishes the Council's objective in relation to the provision of housing. In particular it states that:

'to help address the need for homes, to ensure the economic prosperity of the District and to support its residents and the changing requirements of residents in terms of size, type, tenure and location of homes, whilst protecting our valued environment we will provide for at least 9600 homes within Wealden from 2006 to 2030.'

2.1.3 We consider that this element should not be included in the objective as it does not specifically relate to the spatial element of the vision. Furthermore this element of the objective is then duplicated in Policy WCS1 which we consider is the appropriate location for such criteria to be located.

2.1.4 Although we consider the specific housing target should be removed from the objective we do support the general comments of the objective. The objective clearly establishes the Council's spatial vision for the distribution of housing across the Borough which is then expanded on in the relevant accompanying policies. We therefore consider that the objective should be amended to read as follows:

'New housing will be provided to help address the need for homes, to ensure the economic prosperity of the District and to support its residents and the changing requirements of residents in terms of size, type, tenure and location of homes, whilst protecting our valued environment. Delivery will be phased across the 24 year period of the strategy to provide a realistic timeframe for the market to deliver the housing, and at a rate that allows our communities to adjust to the growth and create mixed and balanced communities. The timescale



will also better provide for the timeframe of necessary infrastructure. 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. Development will be focused in and around the settlements of Hailsham/Hellingley, Polegate/Willingdon/Stone Cross and Uckfield to help stimulate investment in those centres, and, to varying but lesser degrees, in and around Crowborough and Heathfield to meet housing need.'

2.2 Do the policies in the Core Strategy reflect the identified spatial vision and objectives?

2.2.1 The Core Strategy contains thirteen policies which seek to guide the achievement of the objectives. Whilst we in general agree with the principle of the objectives, with the exception of part of SPO3, we do not consider that these have been appropriately translated in to policies in all instances. We deal with each of the policies with which we have concerns in turn.

2.2.2 *WCS1 Provision of Homes and Jobs 2006-2030:* The policy sets out the Council's target in relation to the provision of net additional dwellings and employment floorspace over the plan period. 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. Further justification for the target has been provided by the Council in response to the Inspector's questions following the Exploratory Meeting.

2.2.3 To prevent duplication of our comments contained in our hearing statement in relation to Matter 3: Housing, we do not expand in relation to this policy here. In summary our opinion is that the proposed housing target is too low, has not been derived appropriately and will not meet the needs of the District.

2.2.4 *WCS2 Distribution of Housing Growth 2006-2030:* As previously advised in our response to the Core Strategy pre-submission consultation we support the proposed distribution of housing growth across the District. The approach proposed 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.

2.2.5 It is considered that the identification of Uckfield as a District Centre and the associated level of housing proposed for the settlement is appropriate. 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. 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.

2.2.6 *WCS4 Strategic Development Areas:* 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. Our full comments in relation to this policy are submitted as part of our hearing statement for Session 6: Uckfield Area Strategy and therefore to avoid repetition these are not expanded on further.

2.3 Have reasonable alternatives to the overall spatial strategy been considered?

2.3.1 No. Although the general intentions of the strategy are supported it is considered that certain elements are inappropriate. It is not considered that the Council has fully considered the alternatives to elements of the proposed strategy and this has resulted in them supporting a strategy which we consider, although legally compliant, to be unsound in relation to certain elements.

2.3.2 Our concerns surrounding the housing target for the Borough and the inclusion of Strategic Development Location 1: West of Uckfield are dealt with in our responses to other hearing statements and are therefore not duplicated.



2.3.3 We also wish to raise concerns regarding the process through which the proposed spatial strategy was determined. The housing target for the District has been considered as part of previous consultations however only in combination with a variety of approaches to the distribution of housing. It is not considered that this has allowed for appropriate consideration to be given to the impact of differing housing targets on the strategy for the District.

2.3.4 The housing target for the District and its spatial distribution are key decisions to be taken through the Core Strategy process. These two matters must be considered both separately and in combination to ensure an appropriate strategy is selected. This decision will have far reaching implications for the future of the District and will affect the social, economic and environmental progress of the District. Without full and effective consultation on these matters it is not considered that an effective and appropriate strategy can be established. This has resulted in the Council progressing with a strategy which in our opinion is flawed and will not be successful in achieving the vision for the District set out in the Core Strategy.

2.3.5 Although the Council has attempted to justify its proposed housing target for the District through its response to the Inspector's questions it is not considered that this has been successful. Our analysis of the appropriate housing target for the District is discussed in our hearing statement relating to Matter 3: Housing.

2.4 Is there a clear audit trail showing how and why the preferred strategy was arrived at?

2.4.1 A clear audit trail showing how and why the preferred strategy was arrived at is present for only some of the elements of the strategy.

2.4.2 As discussed above in relation to the housing target for the District this has been considered as part of previous consultations however only in combination with a variety of approaches to the distribution of housing. We consider that this approach is flawed and has not allowed for effective consideration of two key elements of the strategy. Both the housing target and the distribution of housing across the District, in our opinion, should have been considered both individually and in conjunction. The failure to take such an approach has allowed the Council to propose a strategy



which we consider unable to achieve the vision for the District which they have proposed.

2.4.3 Furthermore, previous Core Strategy consultation documents focused on larger scale aspects of the development strategy for the District. As such the proposed strategic allocation was not included prior to the Proposed Submission Core Strategy. Although the more generalised aspects of the Uckfield Area Strategy have a clear audit trail, including public consultation responses, showing how and why the preferred strategy was arrived at, this is not the case for the proposed strategic allocation SD1. We consider that there is a lack of a clear audit trail in relation to the decision to allocate the strategic site west of New Town and that other more appropriate approaches exist. The uncertainty regarding the deliverability of the strategic allocation and the postponement of a thorough assessment of the site to a later DPD is inappropriate as the Core Strategy is the appropriate forum for such decisions to be taken through. The justification behind our concerns in relation to the decision to allocate the strategic site are set out in our hearing statement in relation to Matter 6.

2.5 Is the overall strategy sufficiently flexible to respond to an unexpected change in circumstances?

2.5.1 We do not consider that the overall strategy is sufficiently flexible to respond to an unexpected change in circumstances. The proposed strategy fails to respond to the current needs of the District and therefore is considered to be unlikely to be able to respond to any unexpected change in circumstances. A revised housing target of 550dpa (13,200 over the period 2006 – 2030) should be proposed. This will enable a variety of forms of sites to come forward to meet the changing needs of the Borough.

2.5.2 Concern is also raised in relation to the allocation 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 of unsound as it is not justified or effective. Paragraph 5.11 of the Core Strategy states that the Council recognises that it needs to identify a “*deliverable*” 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 the evidence does not support an allocation as there appear to be many obstacles to its delivery. One of these is that there is unlikely to be housing in the short term due to the potentially long lead-in to commencement on site. In addition one large site is unlikely to deliver the level of housing that two sites in different locations can achieve, given the ability to provide alternative marketplaces and housing products.

- 2.5.3 It is therefore considered that some fundamental changes are required to the Core Strategy in order to meet the needs of the District and ensure flexibility in order to respond to any unexpected changes in circumstances.



SECTION THREE – RECOMMENDED CHANGES

3.1 In summary we recommend that the following changes be made to the Core Strategy:-

1. *SPO3:*

Wording to be amended to that suggested at para. 2.1.4

2. *Policy WCS1:*

The revision of the housing target to at least 550 dpa (13,200 over the plan period)

3. *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 – 2016/2017 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.

Boyer Planning Limited

December 2011

