

Matter 1 /WDC

Wealden District (Incorporating part of the South Downs National Park)

Core Strategy Hearing

Matter 1: Spatial Strategy - Statement by WDC/ SDNPA

December 2011

**Wealden District Council and South Downs National Park Authority
Response to the Inspector's Matters, Issues and Questions
(Issued 3 November 2011)**

Matter '1: Spatial Strategy (WCS1, WCS2, WCS3)'

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

- 1.1 Section 4, paragraph 4.1 of the submitted Core Strategy sets out the Authorities vision and spatial planning objectives for the area and confirms the widespread basis of the consultation that has been undertaken in arriving at the vision. Fifteen Strategic Planning Objectives SPO1-SPO15 are set out in the document. The initial consultation on a preliminary spatial vision was set out in the Council's 2007 Issues and Options consultation (page 143) and asked a number of bespoke questions both on a spatial vision and subsequently upon a series of 14 possible spatial objectives. Paragraphs 8.2-8.4 of that document also explain the relationship between the Core Strategy and the Wealden Community Strategy primary themes set in the community strategy as they will influence the emerging spatial, or core strategy .Paragraph 1.15 of the 2007 consultation set out the clear themes that had emerged from consultation on the Core Strategy and the revised Community Strategy for Wealden. Attached with our statement on Legal compliance is Appendix B that further details the close working relationship between the Local Strategic Partnership and the Council's LDF process in ensuring the link between the Community strategy and the emerging, and now submitted Core Strategy in developing our spatial vision.
- 1.2 The results of this consultation were reported back and taken into consideration in the further round of consultation that took place in 2009 - Core Strategy Spatial development options. Section five of this document explained how the strategic housing and development options being considered shared a number of common issues. Section 5.3 explained how the Regional Strategy (South East Plan) contained a number of key policies and themes (identified in 11 bullet points) that helped to shape these spatial development options. Later paragraphs set out the more local detail and context of how these options might be accommodated within Wealden and the issues that were raised.

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- 1.3 The Vision and Spatial Objectives take into account the Purposes and Duty of the National Park, which apply within the 7% (approx) of the District within the South Downs National Park, as well as the duty placed on all local authorities, under Section 62 of the Environment Act (1995), to have regard to the Parks Purposes and Duty.
- 1.4 Background paper 1 (BP1) on the development of the Core Strategy sets out at section 4 of that paper our spatial strategy methodology combining an appraisal of broad locations with analysis of key issues affecting Wealden (paragraphs 4.2-4.4). BP1 page 14, illustrates the methodology used in identifying our Spatial Strategy. Background Paper 8 provides a summary of the consultation and participation that further shaped the vision elements through the Spatial Development Options consultation of 2009. Sections 2-7 of that paper identify the various processes that we have undertaken, including use of workshops and PAS diagnostic of the evolving strategy and how these have been taken into account in developing our core strategy (Appendix 1 of BP8). This vision is underpinned by 15 broad spatial planning objectives (SPO1-SPO15) set out within the strategy which confirm how we intend to deliver that vision.

B) do the policies in the core strategy reflect the identified spatial vision and objectives ?

- 2.1 Policies contained within the document reflect this identified vision and objectives. For example Objectives SPO3, 4, 5, 6 and 7 are reflected in our Policy approach WCS1 to providing for the levels of housing and employment growth needed within Wealden and also where the bulk of our growth is proposed in the form of sustainable urban extensions (Policies WCS1-WCS34 refer) - to encourage more sustainable development, improved economic performance within our towns, employment and retail provision. Policies for the protection of the environment WCS12 and WCS13, reflect our strategic objectives SPO1, SPO2 and SPO11. We therefore consider that the Core Strategy contains a clear and appropriate spatial vision for the District together with an agreed set of strategic planning objectives which are appropriate for the District. The Policies set out within the Strategy appropriately reflect the identified spatial vision and objectives as referred to.

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C) have reasonable alternatives to the overall spatial strategy been considered?

- 3.1 Yes. In developing our Strategy we have consulted widely on how we may best accommodate growth. Our 2007 Issues and Options consultation document sought views on how best to accommodate the growth required of us by the South East Plan and as to the appropriate split of growth between north and south of the District, urban extensions, rural settlements and the development of a settlement hierarchy. Sections 4 and 5 the 2007 consultation refer specifically to the development of a settlement hierarchy and growth potential of villages. Paragraphs 4.27 - 4.40 refer. The consultation also considered various splits of development between the towns and villages and also how best we could accommodate the growth required by the South East Plan, both for the Sussex coast sub region identified in the RS and for the rest of Wealden .Further detail on spatial alternatives is set out in paragraphs 4.41-4.53, at pages 48 -50 of the 2007 document (questions 8a-8d and questions 9a-9c of the document refer). For each town we identified a number of possible areas of search for growth by use of key diagrams/ plans , together with an indication of their potential to accommodate housing and other growth (see as examples the maps on pages 56,62,70, 78 and 86 of the document for examples in respect of Crowborough, Heathfield, Uckfield, Hailsham and Polegate/ Willingdon/Stone Cross. A further option, looking at possible locations for a new settlement, was also produced and consulted upon (see map on page 96 of the 2007 Issues and Options document).
- 3.2 For each of these main options and alternatives that were being considered a table set out the various parameters under consideration e.g. the broad area, potential scale of housing being considered, and impacts and issues (landscape and biodiversity, transport and accessibility, infrastructure and other services). The results of this widespread consultation were reported back through the Council's LDF Sub Committee to enable further development of our core strategy.
- 3.3 Following this work, and a change to the regulations in 2008 the Council again consulted widely on a range of possible spatial development options in order to accommodate some 11,000 new homes over the plan period which was the number required of Wealden by the South East Plan following its adoption in 2009. Concurrently with this exercise our SHLAA was a very comprehensive exercise - developed alongside a number of key stakeholders - to assess where there was deliverable potential for accommodating growth.

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- 3.4 We have subsequently used the SHLAA to identify where there was potential through willing landowners to accommodate growth and then to undertake appraisal of this land through our published SHLAA work. Following this exercise sustainability appraisal has then been used to identify and compare sites deemed as SHLAA suitable to arrive at our preferred strategy. These were assessed in respect of the Council's 22 approved sustainability objectives (please see Background Papers on SA of the core strategy for list of these objectives - pages 5-10 refer) to assist in arriving at the identified areas for growth set out in Policy WCS4 - Strategic Development Areas.
- 3.5 The sustainability appraisal report that was published as BP10 (pages 100-101) to the strategy sets out the consideration of *"reasonable alternatives taking into account the objectives and scope of the plan or programme"* (taken from the SEA Directive) and also *"an outline of the reasons for selecting the alternatives dealt with"*. This SA considers three broad scenarios for growth - one following the RS distribution of housing, two a possible re distribution from south Wealden to North Wealden and a third, selected option. Table 8.10 (pages 101 -107 of BP10) follows a similar approach in looking at growth options for each of Wealden's towns with reasons and references as to why particular options were selected or rejected.
- 3.6 The submitted Background Papers supporting the SA of the Core strategy identify at section 4 (submission document A3) a detailed assessment of the scenarios referred to. We also set out at pages 19-21 our SA of the broad spatial objectives of our strategy.
- 3.7 In conclusion and in considering alternatives to the overall spatial strategy the chronology of key events, and the relevant evidence bases (including participative evidence), that lead to the final distribution are set out below.
- Issues and Options Consultation (2007) included alternative broad locations for housing growth, a strategy for employment growth, a rural settlement strategy and areas of potential new settlements. Background Paper 8: Summary of Core Strategy Consultation and Participation (reference A6, pages 7 to 10) provides a summary of this process and how this has been taken into account in the shaping of the distribution of housing.

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- Consideration of the responses of the Issues and Options Consultation, as well as national and regional guidance were used to develop six housing options in the 2009 Spatial Development Options Consultation. Background Paper 3: Development of the Strategic Housing Options (reference C8) shows the development of options. The Consultation sought views on objectives, developed from previous consultation, and the spatial distribution of housing on a Parish level. A Summary Guide to the Evidence Studies (reference C9) was published at the time of the consultation and Background Paper 8: Summary of Core Strategy Consultation and Participation (reference A6, pages 15 to 17) provides a summary of the consultation process and how this has been taken into account in the shaping of the distribution of housing.
- In 2010 town objectives were created, as shown in the Sustainability Appraisal Report (reference A2, paragraph 5.7) from the evidence base including the previous participative evidence as shown above, Wealden Profile (reference C6), the Town Master Plans a summary of which is contained within Background Paper 7 (reference A23) as well as the Housing Register (shown in Background Paper 2: Managing the Delivery of Housing reference A18 page 52), the Employment Land Review (H3), The Shopping Study (reference H5), the Housing Market Assessments (reference I4 and I5) and the Wealden Housing Needs Assessment (I8 and I9). These objectives shape the distribution between towns.
- The Strategic Housing Land Availability Assessment was published in March 2010, which provided information as to the land availability and the ability for settlements to provide for housing growth. The SHLAA took into account our evidence of the physical attributes of the District including flood risk through our Strategic Flood Risk Assessments (reference G1, G2, G3 and G4), landscape impact through the Landscape Character Assessment (M1) and other national and regional policy implications.

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3.8 From the 2009 consultation responses and the agreed approach to the refining of options by the LDF Sub Committee on 16th December 2009 (reference A1, pages 9 to 19 and minutes), the town objectives (with associated evidence), the SHLAA evidence, and infrastructure requirements and capacities (Infrastructure Delivery Plan reference A25) was used to produce 2 alternative town distributions. This was coupled with a developed rural settlement hierarchy (developed from the 2007 and 2009 consultations), and relevant evidence ,as shown in Background Paper 1: Development of the Core Strategy,(reference A17 Chapter 7) to inform the rural housing provision. Two housing options were then tested. The testing of infrastructure matters, as well as assessment under the Habitat Regulations (reference A24) resulted in the final and preferred distribution, subject to minor amendments through updates to the evidence base (Cabinet 24th November 2010, reference O3, pages 76 to 77) and then to Full Council on the 8th December.

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

4.1 Submitted Background Paper 1 on the Development of our Core Strategy sets out in detail how and why the preferred strategy was arrived at. Section 3 of that BP explains what has shaped the strategy and its relationship with national guidance and the regional Strategy. We refer also in the paper to the breadth of our evidence base and provide a summary of the development of the Strategy itself. This sets out from the beginnings of our LDF process the various consultation exercises, workshops, exhibitions and partnership working which we have used in developing the CS. We highlight the consultation on Issues and Options (2007) and possible development of Spatial Options (2009) and the reporting back of the results from these exercises. Section 4 of BP1 sets out the methodology we have used in developing the document and Section 5 refers to the key strategic issues which have helped shape it.

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- 4.2 Sections 6 of the paper identifies the strategic factors affecting and influencing growth and 7 addresses the mechanisms for distribution of our growth based upon development of a settlement hierarchy and looks at strategic distribution of growth between towns and villages. Subsequent sections of the BP1 show how we have assessed growth potential at our towns and villages and looked at the towns development potential using evidence gathered from our SHLAA and use of accompanying sustainability appraisal work. Paragraphs 8.68 - 8.97 provide a summary of the rationale for the overall distribution of growth for the rest of Wealden (outside of the Sussex coast sub - region as identified in the RS), for each of the principal settlements and a similar approach is set out for the Sussex coast sub region .Paragraphs 8.78 - 8.97 adopt a similar approach for the villages within the two broad areas identified within the RS.
- 4.3 Background paper 10 - Sustainability Appraisal of the core strategy identifies at section 1 how the process of SA assists the planning authority in the delivery of sustainable development and confirms its place as part of the evidence base of the strategy. Figure 1 (page 2 - BP10) shows how the SA process is integral to the testing and development of the core strategy DPD. At paragraph 1.14 we set out the six spatial development options for housing growth along with the four for employment that were considered in July 2009 and the reasons for the selection of these options or indeed their not being taken forward. We show how the settlement hierarchy, consulted upon initially in 2007 and subsequently refined in 2009 following advice from PINS and with added emphasis on accessibility of settlements, was arrived at. Table 1.2 shows a summary of the SA work on Core Strategy Policies and strategies when assessed against the Councils adopted sustainability objectives (This SA scoping report was produced and consulted upon in 2006 and published in 2007).
- 4.4 Table 6.1 of BP10 shows the various spatial housing and employment options from the 2009 consultation and sets out why particular options were selected or not taken forward. A similar approach is taken in section 7 of BP10 in explaining the development of the final settlement hierarchy. Section 8 deals with the sustainability appraisal of the various plan alternatives, scenarios A -C, with A being a distribution based upon the RS, B a possible relocation of growth from South to North again based upon RS figures and C a testing of maximising growth within acknowledged capacity constraints .

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- 4.5 The strategy has been developed following two informal rounds of consultation under Regulation 25 and 1 Regulation 27 representations exercises. Sustainability appraisal has been an integral part of the process with each of these exercises being supported by published SA reports. Following consideration of the responses to the Issues and Options consultation in 2007 a series of possible spatial development options was developed. Each of the broad options set out in 2009 provides alongside it a summary of the Sustainability Appraisal for each option in respect of meeting the Councils agreed 22 sustainability objectives. Further details of the perceived advantages and disadvantages of each of the six housing distribution options and the four employment distribution options were set out in the 2009 document. Paragraphs 3.3-3.10 explain in greater detail how the strategy was being developed and consulted upon.
- 4.6 In February 2011 we published our proposed submission core strategy for representations. This showed the Council's preferred strategy for delivery of growth and contained a key diagram together with a series of key diagrams for the towns identifying the selected strategic development areas where growth would be accommodated. The document was supported by a number of published background papers and evidence studies including a sustainability appraisal of the proposed submission document. As indicated above our SA report (BP10) shows why certain options have been taken forward for selection or rejected.
- 4.7 Reports on the nature and level of responses and representations received have been submitted to the Council's LDF sub Committee for consideration at each relevant stage in our process and prior to progressing the document through a joint meeting of the Planning Committees, then through Cabinet and finally through Full Council. All evidence studies have been published on our website and have again informed the chosen strategy as appropriate. BP 8 - Summary of the Core Strategy consultation and participation further sets out each of the stages which we have taken, and the reasons for, arriving at our preferred strategy. In conclusion we consider that we have a clear audit trail showing how and why the preferred strategy was arrived at.

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E) Is the overall strategy sufficiently flexible to respond to an unexpected change of circumstance ?

- 5.1 The Strategy sets out how the Council intends to monitor and implement the Strategy. A number of triggers for possible review are also referred to in broad terms within the Strategy itself, e.g. paragraph 6.11 final bullet point in respect of Uckfield (page 37 of the CS), page 47, paragraph 6.36 in respect of Crowborough (and where a contingency SDA is identified) paragraph 6.41 (Heathfield) and pages 41 and 45, paragraphs 6.20 and 6.32 respectively for Hailsham and for Polegate/ Willingdon.
- 5.2 Paragraph 8.3 refers to the development by the Council of a number of indicators to provide a consistent basis for monitoring performance. It identifies at paragraphs 8.4 - 8.6 how this is linked in with other reporting mechanisms and updating of the Infrastructure Delivery Plan, its associated risk analysis and reviewed as part of our Annual Monitoring Report (AMR). In particular paragraph 8.5 of the strategy and paragraph 1.13 of the submission Background Paper 13 (implementation and Monitoring Framework) confirms that monitoring of the performance of core strategy policies will be done through the AMR.
- 5.3 Our most recent approved AMR was considered and approved by Cabinet in December 2012 and sets out in detail those indicators which we intend to use to measure delivery and performance and alongside these are agreed trigger points that will be used to prompt review. This approved AMR is posted on the Council's website. The Authorities accordingly consider the strategy to be sufficiently flexible to respond to unexpected changes in circumstance .