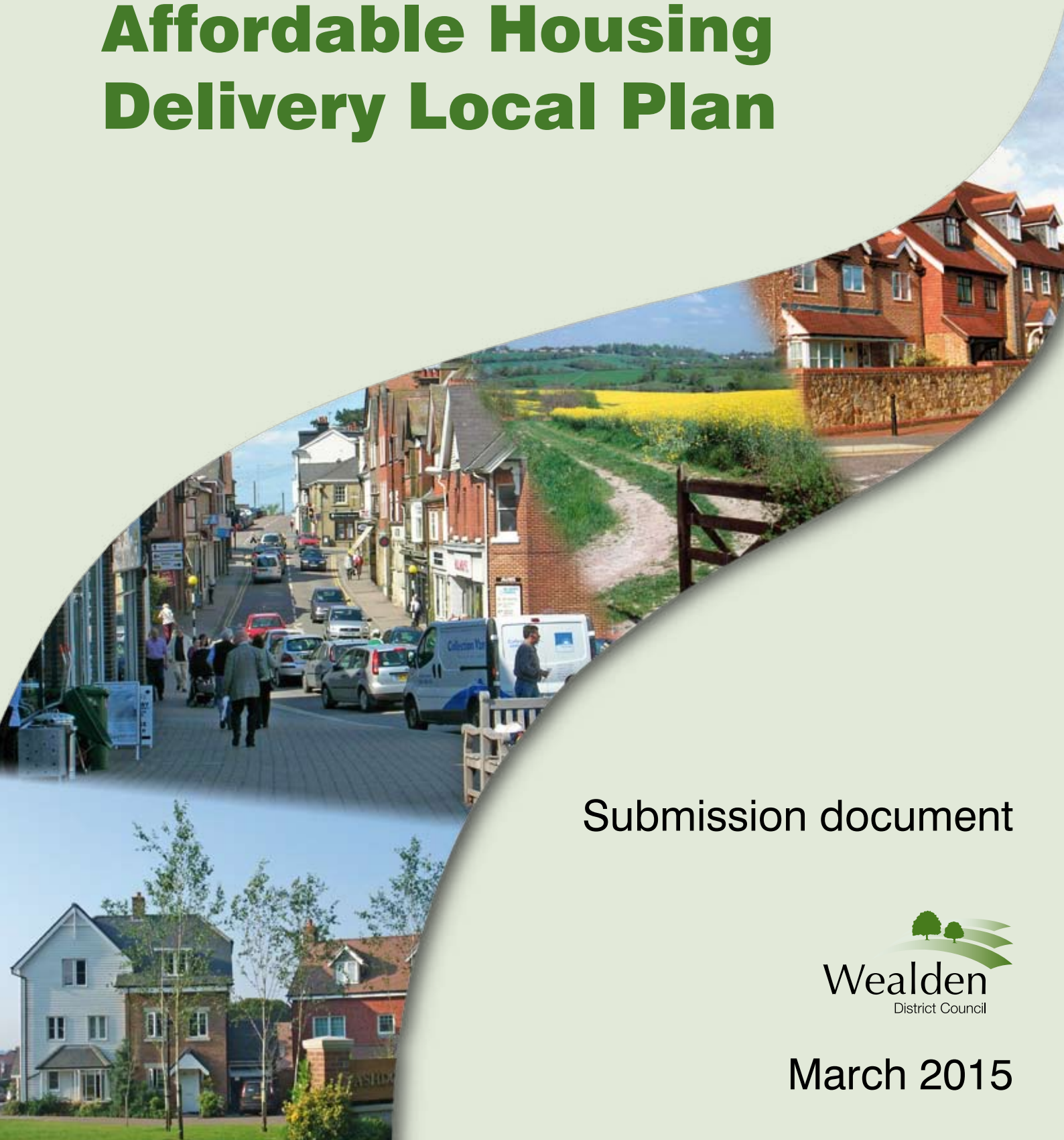
Wealden District Council Local Plan

Development of the Affordable Housing Delivery Local Plan



Submission document

Wealden
District Council

March 2015

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NAPM RECYCLED 75% APPROVED

1. Introduction

1.1 This document provides the background to the development of the Affordable Housing Delivery Local Plan, and explains how the Duty to cooperate was met in the production of the document.

2. Background

2.1 On 12th September 2014, the Portfolio Holder took a Single Portfolio Holder decision to publish for representations under Regulation 18[1] an Affordable Housing Delivery Local Plan. The scope of the Plan was the review of the Wealden District Core Strategy Policy WCS8 concerning Affordable Housing.

2.2 Prior to September 2014, the Council had been developing a Community Infrastructure Levy (CIL), taking into account policies within the adopted Core Strategy Local Plan and the Strategic Sites Local Plan. The CIL Charging Schedule was timetabled to be submitted for examination in 2015, in order to enable CIL to be collected when legislation changed with regards to Section 106 planning obligations in April 2015. The report associated with the Portfolio Holder decision explained that when submitted the CIL examiner would consider whether the policy aspirations of the Council's Local Plan could be achieved when the CIL is in place, for example whether the affordable housing target can be met.

2.3 The adopted Core Strategy Affordable Housing Policy (WCS8) requires affordable housing to be provided on sites of 5 or more dwellings or on sites of 0.2 hectares or more. Sites allocated in a site allocations Development Plan Document, may specify a different affordable housing target having regard to viability assessment and site specific considerations. It further states that the provision should incorporate a mix of tenures, and that tenure split will be negotiated on each site. However the presumption is that around 80% of the affordable housing will be social rent and 20% remainder for intermediate accommodation.

2.4 The Strategic Sites Local Plan, which was submitted in March 2014, is currently being examined and identifies the amount of affordable housing on an allocated site basis. The majority of sites remain with a requirement of 35% affordable housing, however sites at Stone Cross and Pine Grove have a requirement for 40% affordable housing. The tenure of the affordable housing for Strategic Sites changed from the Core Strategy policy to 40% social rent, 40% affordable rent and 20% intermediate accommodation.

2.5 The proposed CIL is viable, taking into account the policies within the Core Strategy and the Strategic Sites Local Plan. However, the delay to the

[1] The Town and Country Planning (Local Planning) (England) Regulations 2012

Strategic Sites Local Plan meant that a review of the Core Strategy Affordable Housing Policy was required for the purposes of CIL.

3. Development of the Plan

3.1 The Affordable Housing Delivery Local Plan was developed in the following chronological stages.

Issues and Options

3.2 The Affordable Housing Delivery Local Plan Issues and Options Consultation took place between 22nd September and 3rd November 2014. A number of reasonable alternatives were considered, and a Sustainability Appraisal Report was published alongside the document.

Proposed Submission

3.3 A summary of the consultation responses to the Issues and Options Consultation were reported to the Local Development Framework Sub Committee and Joint Planning Committee North and South on 13th November 2014. As a result of the recommendations made by the Local Development Framework Sub Committee and Joint Planning Committee North and South, Full Council agreed on 26th November 2014 to the publication of the Proposed Submission Affordable Housing Delivery Local Plan. Subject to the consideration of responses it was proposed that the Affordable Housing Delivery Local Plan be submitted to the Secretary of State for examination shortly after the 12th January 2015.

3.4 The Proposed Submission Affordable Housing Delivery Local Plan, together with the Sustainability Appraisal Report, was published for representations on Monday 1st December 2014 for 6 weeks. On 28th November 2014, a written ministerial statement regarding the use of planning obligations for the provision of affordable housing was published and the NPPF and resulting Government Guidance was changed. National policy now states that affordable housing contributions should not be sought on sites of 10 units or less, and which have a maximum combined gross floor space of 1000 square metres. However, for designated rural areas authorities may choose to implement a lower threshold of 5-units or less where affordable housing contributions should not be sought. In addition to this, between 6 and 10 dwellings planning obligations should only be sought in the form of cash payments which are commuted until after completion of units.

Revised Proposed Submission

3.5 The change to Government Policy and Guidance was reported to the Local Development Framework Sub Committee and Joint Planning Committee North and South on 15th January 2014. It was reported that the change in national policy would have an impact on the provision of affordable housing with a change in threshold to 11 dwellings and above. However, designated rural areas may have a threshold of 6 dwellings or above. From

advice received it was believed that designated rural areas under Section 157(1) of the Housing Act 1985 included the Area of Outstanding Natural Beauty (AONB) and the Parishes of Arlington, Berwick, Buxted, Chalvington with Ripe, Chiddingly, Danehill, East Hoathly, Fletching, Framfield, Frant, Hadlow Down, Hartfield, Hellingly, Herstmonceux, Hooe, Horam, Isfield, Laughton, Little Horsted, Long Man, Maresfield, Mayfield, Newick, Ninfield, Pevensey, Rotherfield, Selmeston, Wadhurst, Warbleton, Wartling, Westham, Withyam and specific areas identified on maps contained within legislation in the Parishes of Forest Row, Hailsham, Heathfield and Waldron, Polegate and Willingdon and Jevington.

3.6 The report stated that it is necessary for the Council to submit what it considers to be a sound plan for examination by the Secretary of State. Whilst the Council has evidence of the need for affordable housing and that affordable housing provision on smaller sites is a viable proposition, it is necessary for the Council to have regard to national planning policy. It would be necessary for the Council to have good reasons to not conform to national policy, and with the amount of land within the District considered to be a rural designated area it was recommended to revise the policy to reflect national policy. No changes to the proportion or tenure of affordable housing were proposed.

3.7 Full Council agreed on 28th January 2015 to the publication of the Revised Proposed Submission Affordable Housing Delivery Local Plan. The document, with the accompanying Sustainability Appraisal Report, was published for representations on 2nd February 2015. The period for representations closed on 16th March 2015. Subject to the review of consultation responses it was the intention of the Council to submit the Affordable Housing Delivery Local Plan for examination.

Submission Document

3.8 During the consultation on the Revised Proposed Submission Affordable Housing Delivery Local Plan it came to our attention, after further enquiries were made, that Section 157 (1) of the Housing Act 1985 only covered the Area of Outstanding Natural Beauty and a small number of parishes within the country. These parishes not within the AONB did not include parishes within Wealden District.

3.9 Text has been amended in the submission document to clarify the situation.

Justification for Local Plan approach

3.10 The change in Government policy regarding Section 106 states that

•contributions should not be sought from developments of 10-units or less, and which have a maximum combined gross floorspace of no more than 1000sqm

•in designated rural areas, local planning authorities may choose to apply a lower threshold of 5-units or less. No affordable housing or tariff-style contributions should then be sought from these developments. In addition, in a rural area where the lower 5-unit or less threshold is applied, affordable housing and tariff style contributions should be sought from developments of between 6 and 10-units in the form of cash payments which are commuted until after completion of units within the development. This applies to rural areas described under section 157(1) of the Housing Act 1985, which includes National Parks and Areas of Outstanding Natural Beauty

•affordable housing and tariff-style contributions should not be sought from any development consisting only of the construction of a residential annex or extension to an existing home

3.11 The changes to policy concerning the use of Section 106 planning obligations identify circumstances where the use of obligations should not be sought. It is necessary for the Council to have regard to national planning policy in devising its policies and it is necessary for the Council to have good reasons to not conform to national policy. The fundamental principles of national policy remain within the submitted policy AFH1, however in this case the Council has a number of good reasons to deviate from national policy in relation to what is defined as a rural area.

3.12 Wealden District is a rural District, and is classified by the Office for National Statistics as a Rural 80 Local Authority. This means that at least 80% of the population of Wealden District lives in a rural area. It is not clear from Section 157 (1) of the Housing Act 1985 why the AONB is designated as rural for the purposes of the Act, whilst other rural areas are not designated as such. With the exception of the landscape quality designation many of the rural villages and parishes within the District have comparable qualities whether they are inside or outside of the AONB designation.

3.13 Data provided by East Sussex in Figures for 2014 shows that outside of the five main towns[2] the population density per hectare is around 1 person per hectare. The parishes within the AONB have a density of around 0.8 persons per hectare and outside the AONB and Towns around 1.13 persons per hectare. This is compared to the Towns[3] which have a density range from around 11 to 20 persons per hectare. In addition, the largest populations in parishes in the AONB are Wadhurst with 4,969 persons and Forest Row with 4,992 persons. In the rural parishes outside of the AONB[4] the largest populations in parishes include Buxted with 3645 persons and Maresfield with 3639 persons.

[2] The five main towns include Hailsham, Crowborough, Uckfield, Heathfield and Polegate and Willingdon. The data includes parishes that straddle the boundary with the South Downs National Park

[3] Excluding Parishes of Heathfield and Willingdon which are urban areas with significant hectares of unpopulated rural areas.

[4] Not including Westham Parish which includes the Stone Cross Settlement, which is situated adjacent to Eastbourne and is considered to be an urban settlement.

3.14 In terms of house prices, the geographical differential between house prices is provided in Community Infrastructure Levy Viability Report (August 2014). Figure 6.1 (page 40) shows that in non AONB rural areas such as Chiddingly and East Hoathly the average house price sale between January 2012 and April 2014 was £450,000 to £510,000 which is comparable to Wadhurst which is within the AONB. Indeed the average for Chiddingly and East Hoathly is higher than a significant proportion of AONB Parishes including Mayfield and Rotherfield which have an average price sale of £390,000 to £450,000. Although Hartfield, which is within the AONB, has the highest average house price of £570,000 to £630,000 non AONB areas including parts of Selmeston and Ripe have an average house price sale of £510,000 to £570,000.

3.15 The Core Strategy adopted in 2013 provides a settlement hierarchy, which identifies sustainable villages with a development boundary and less sustainable villages without a development boundary and where countryside policies apply. This hierarchy does not differentiate between AONB and non AONB villages. Page 9 and 10 of the Core Strategy shows that a mixture of AONB and non AONB settlements have a development boundary and that a significant number of non AONB settlements do not have a development boundary. Whilst AONB areas are designated in order to conserve and enhance natural beauty this does not mean that development is prohibited, and in certain circumstances AONB settlements may have more growth than non AONB settlements. Arguably this is reflected in house prices where non AONB areas may have greater house prices than AONB. In addition to this, the South Downs National Park has an influence over non AONB settlements as a proportion of land within Wealden District is situated adjacent to the South Downs National Park, and its setting will also have a bearing on house prices.

3.16 Due to the high house prices, affordability remains an issue within Wealden District. This is a particular issue within all of the rural areas, both AONB and non AONB. The average income within the District is £41,287[5] with little differentiation between the non AONB and AONB rural areas described elsewhere in this paper. The house price to earning ratio in Wealden in 2013 is 8.13 with the lower quartile affordability ratio 2013 of 10.2. This is compared to the average within England of 5.38 and 6.5 accordingly.

3.17 The Council relies upon the use of rural exceptions policy and rural allocations in order to provide the majority of affordable housing in rural areas, due to the limitation of development boundaries in both the AONB and the non AONB areas. Due to the scarcity of such development the Council also relies upon the Statutory Instruments which designate rural areas within Wealden in relation to providing affordable housing in perpetuity. The Housing (Right to Acquire or Enfranchise) (Designated Areas in the South East) Order 1997 and The Housing (Right to Enfranchise) (Designated Protected Areas) (England) Order 2009 identify the following to be rural areas:

[5] East Sussex in figures Average household income in 2014 - parishes

Parishes of Arlington, Berwick, Buxted, Chalvington with Ripe, Chiddingly, Danehill, East Hoathly, Fletching, Framfield, Frant, Hadlow Down, Hartfield, Hellingly, Herstmonceux, Hooe, Horam, Isfield, Laughton, Little Horsted, Long Man, Maresfield, Mayfield, Newick, Ninfield, Pevensey, Rotherfield, Selmeston, Wadhurst, Warbleton, Wartling, Westham, Withyam and specific areas identified on maps referred to in the Orders in the Parishes of Forest Row, Hailsham, Heathfield and Waldron, Polegate and Willingdon and Jevington.

3.18 The Community Infrastructure Levy Viability Evidence base update (August 2014) provides the most recent viability assessment of development within Wealden District. It shows that the smaller schemes of 5 dwellings, with provision of affordable housing, are more viable than larger schemes of 50 dwellings across the District.

3.19 The Policy AFH1, reflects the rural areas designated by the The Housing (Right to Acquire or Enfranchise) (Designated Areas in the South East) Order 1997 and The Housing (Right to Enfranchise) (Designated Protected Areas) (England) Order 2009 and contains all land within the AONB. Whilst outside the AONB, this does not strictly conform to Section 157 (1) of the Housing Act 1985, it is considered that there are compelling reasons to undertake this approach. Section 157 (1) of the Housing Act 1985 does not make it clear the reasons why designated areas such as Areas of Outstanding Natural Beauty are special cases, as affordable housing does not relate to landscape character. In Wealden District it is proven that in terms of house prices, housing potential, affordability and population density there is no difference that would make the AONB a special case compared to other rural areas in terms of affordable housing. It is the designated rural areas where affordability is and viability is greatest.

3.20 The evidence in relation to the overall need and viability has not changed significantly between the adopted Core Strategy and the submission of the Affordable Housing Delivery Local Plan. The Core Strategy sets a threshold of 5 or more dwellings where affordable housing is required. It is therefore considered that across the whole of Wealden the case remains that this threshold is valid. However, in light of the change in Government Policy it proposed to change the threshold in urban areas to 11 and above. However, there is no proven differential in affordable housing terms between the AONB and non AONB rural areas within the District and it is proposed that a threshold of 6 and above in these areas are reasonable.

4. Duty to Cooperate

4.1 The provision of housing is a strategic matter affecting two or more local authority areas. Policy AFH1 relates to the provision of affordable housing as opposed to the overall numbers of housing, however any change in policy may have an impact on surrounding areas. However, it must be noted that the eligibility of occupation of affordable housing, including that of rural affordable housing is not subject to planning policy but that of housing allocations within each local authority area.

4.2 The Town and Country Planning (Local Planning) (England) Regulations 2012 state that the bodies prescribed for the purposes of section 33A(1)(c) of the Localism Act are—

(a) the Environment Agency;
(b) the Historic Buildings and Monuments Commission for England (known as English Heritage);
(c) Natural England;
(d) the Mayor of London;
(e) the Civil Aviation Authority;
(f) the Homes and Communities Agency;
(g) each Primary Care Trust established under section 18 of the National Health Service Act
2006(b) or continued in existence by virtue of that section;
(h) the Office of Rail Regulation(c);
(i) Transport for London(d);
(j) each Integrated Transport Authority(e);
(k) each highway authority within the meaning of section 1 of the Highways Act 1980(f)
(including the Secretary of State, where the Secretary of State is the highways authority);
and
(l) the Marine Management Organisation.

(2) The bodies prescribed for the purposes of section 33A(9) of the Act are each local enterprise partnership.

4.3 Due to the scope of the policy, and the need to be proportional in terms of engagement, the following bodies were consulted:

the Environment Agency; the Historic Buildings and Monuments Commission for England; Natural England; the Homes and Communities Agency, Transport for London, the Highways Authority, Highways Agency and the Marine Management Organisation, the Civil Aviation Authority and each Primary Care Trust established under section 18 of the National Health Service Act 2006(b) or continued in existence by virtue of that section

4.4 The Local Enterprise Partnership is intrinsically involved in Plan making and Plan implementation. The Affordable Housing Delivery Local Plan seeks to assist in the delivery of Strategic Sites and the Community Infrastructure due to the delay in the Strategic Sites Local Plan examination. The submission regarding the involvement of the LEP to the Strategic Sites Local Plan is relevant to the Affordable Housing Delivery Local Plan as is provided at Appendix A.

4.5 The development of this Plan was raised with East Sussex County Council as well as other Local Authority within the area and surrounds primarily through the Local Plan Mangers Meetings. Local Plan Mangers Meetings relevant to the Affordable Housing Delivery Local Plan are:

- 24th September 2014
- 25th November 2014
- 28th January 2015

4.6 In addition to the Local Plan Manager Meetings, Wealden District Council liaises with the County Council through joint Infrastructure work. As the Affordable Housing Delivery Local Plan has a direct impact upon Infrastructure funding through the development of CIL, the Plan has been discussed informally and formally through the joint Infrastructure Provision meeting on 19th January 2015.

4.7 In addition to this a report on the Affordable Housing Delivery Local Plan was taken to the East Sussex Strategic Planning Members Group on 8th December 2014. This group is made up of relevant Members from all authorities within East Sussex including East Sussex County Council. Representatives from Brighton and Hove City Council also attended this meeting. The minutes of the meeting are provided at Appendix B.

4.8 Notwithstanding this, all surrounding Local Authorities were consulted on each formal consultation stage of the Local Plan. Other meetings with individual authorities include a meeting with Mid Sussex District Council officers on 2nd February 2015 which identified affordable housing policy matters as well as other issues. Also discussions with Rother District Council have taken place with regard to affordable housing policy, particularly in relation to rural areas. In addition to this Wealden District and Rother District Councils are working together in relation to creating a methodology for commuted sum payments, which will be part of an Affordable Housing SPD resulting from this Local Plan.

Wealden District Council Submissions – 20th June 2014

Wealden Strategic Sites Local Plan Examination

MF1(3): Duty to Cooperate

Question : Document A17 sets out the Council's initial comments on the way that it has complied with it's Duty to Cooperate (DTC).A number of meetings are cited in relation to the developments of SANGS in relation to Ashdown forest . Has there been a similar number of meetings –

MF1 (3) with the LEP and other commercial interest groups, and what outcomes have occurred ?

WDC statement .

With regards to engagement with the LEP and commercial interest groups in the development of the SSLP and the interrelationship between the Strategic Sites Plan and the LEP/ draft Strategic Economic Plan (SEP) the Council is represented at SELEP Board level by the Leader of the Council, Cllr Robert Standley who has been on the Board since its inception. The first meeting of the SELEP was the interim Board meeting held on the 2nd December 2010 at Dartford. Both the Leader and a senior officer (Head of Planning Policy and Economic Development) represent the Council at the meetings of Team East Sussex (TES) which meets regularly and prior to the Full SELEP Board meetings in order to ensure a coordinated East Sussex approach to engagement with the LEP and in particular the ongoing work that has been taking place at LEP level in the drafting of the Strategic Economic Plan(SEP). This Plan , referred to at the hearing sessions by JAA Associates as the SEP (Strategic Economic Plan) was in fact only presented to Government at the end of March 2014 however the engagement of the Council with the SELEP, as referred to above, was in fact clearly from the very first meeting of the interim SELEP Board in December 2010.The SELEP Board of course, in addition to Local Authority representatives, comprises a significant number of Business and commercial interests that sit on the Board.

In response to the Inspectors question MF1(3) regarding commercial interest groups and their engagement with the SSLP, as part and parcel of the consultation processes for the development of the SSLP the Council has consulted with a very wide range of such interests and businesses on its Local Plan (formerly LDF) data base, with all of the Districts local Chambers of Trade and Commerce, with Sussex Enterprise, the Federation of Small Businesses (FSB) and the local Enterprise Agency (EDEAL). The various responses received were considered as part of the wider consideration of all comments received upon the emerging Strategic Sites Local Plan. All of those responses received from those who made comments and representations are set down within the Council's submitted Regulation 22(1)(c) consultation statement and include comments from Local Chambers of Trade and Commerce, Jobcentre Plus, the Institute of Directors (Sussex), Sussex Enterprise, Eastbourne and District Enterprise Agency (EDEAL) the Federation of Small Businesses (FSB) and the NFU.

The responses received from all of these bodies / business interests were subsequently reported to the Council's Local Development Framework Sub Committee in the further shaping and development of the Strategic Sites Local Plan.

In terms of specific outcomes from this liaison with Business the Council's submitted Consultation Statement as part of the supporting evidence for this SSLP sets down a summary of all of the comments received together with a response/ commentary from the Council and, where appropriate, any suggested amendments to the Plan. These are set down in the consultation document which also categorises the comments received from both the Issues and Options consultation and the subsequent pre submission consultation and the submission Plan.

At the Hearing sessions on the first day it was suggested by Judith Ashton Associates that there had been no connection or evidence of links between the SSLP and the draft Strategic Economic Plan (SEP) of the SELEP. The Council considers this comment to be without foundation for whilst the draft SEP was only presented to Government at the end of March of this year consultation upon it and engagement with the SELEP process has been ongoing for some considerable time. As referred to above it is also clear that the Council was actively represented at senior political level on the SELEP Board by the Leader of the Council and also at senior officer level , both at Board meetings and at the subsequent Team East Sussex (TES) meetings .

Wealden has been actively engaged at Team East Sussex (TES) level from the very beginnings in the LEP and in the process of responding to the emerging draft SEP itself. Far from seeing " no evidence of links between the SSLP and the SEP we consider that the Council's input to this process has been instrumental in ensuring that within the East Sussex Chapter of the SEP there is explicit and very clear reference to Wealden's growth proposals – both for housing and employment purposes that are contained within its adopted Core Strategy and now being taken forward through the allocated sites as identified within the SSLP itself .In terms of meeting the Duty to Cooperate it is also relevant to point out the clear interrelationship established between the adopted Core Strategies of Eastbourne and Wealden (south Wealden) and our joint bid, specifically made to the LEP and as requested by SELEP for what was then detailed as the A22 Enterprise Zone growth corridor. Attached to this **Statement as MF1(3)Appendix A** –is evidence by a wide range of examples of the Council's engagement with the LEP and the duty to cooperate . Page2-35 of this Appendix show the early input from the Council to the emerging SEP East Sussex Chapter whilst pages 96 – 104 of this appendix sets out the East Sussex Chapter of the SEP as submitted to Government. Paragraphs 8.19 and 8.21 make very specific reference to the growth identified within the SSLP and the chapter generally shows great cooperation across all of the County Authorities in inputting to the LEP process.

A sample of TES minutes is attached to this statement as MF1(3) Appendix A – pages 86 - 88 which confirms the engagement of Wealden District Council at senior political level not simply with all neighbouring authorities in this matter but also with a wide range of business interests represented at those meetings including the Association of Chambers of East Sussex (ACES) and also the Federation of Small Businesses (FSB).Also referenced at page 108 is a TES agenda where there is a specific item on the requirement for inter authority and business responses being needed to the SEP through SELEP. This matter is then picked up in the Full Board meeting of SELEP 13th December 2013 in its agenda item 5 (MF1(3) Appendix A page 43.)

In addition further and higher education establishments are represented at TES meetings to represent the skills and learning objectives and priorities established

through SELEP. With regards the Inspectors question regarding the Council's engagement with other commercial interest groups within Issue 97, 28th November 2013 of the SELEP bi- weekly briefing and which is included as part of our MF1(3) Appendix A there is specific mention of a business planning and funding seminar arranged by Wealden District Council and where SELEP officers attended as exhibitors to engage with business. As part of this event there was also a specific presentation by Wealden officers on Planning matters including questions on progress of the emerging SSLP. This event, held in December 2013, was attended by over 100 individuals and organisations and again was an opportunity for the Council, businesses and for SELEP to engage. See page 1 of Appendix A and the the fifth bullet point in this SELEP wide briefing note.

The Inspector has asked what specific outcomes have come from this engagement and in response attached to this statement is the East Sussex Chapter of the submitted SEP (Chapter 8 attached).

In respect of specific outcomes from such engagement and the Duty to Cooperate Wealden is pleased to see that at paragraph 8.19 of the East Sussex Chapter, entitled Eastbourne / South Wealden the opening line of that paragraph states

"these two areas also have a history of working together to maximise their joint potential"

This paragraph goes on to state that **"The Core Strategy (Wealden) proposes significant housing growth within Hailsham, (1,330 dwellings) and Uckfield (1,000 dwellings), with additional growth at Stone Cross (650 dwellings)and Polegate(700 dwellings)"**

The Council would accordingly suggest that contrary to assertions made at the Hearing of their being no evidence of links between the SSLP and the SEP that there are exceedingly clear and evident links. Indeed the above level of detail contained within the SEP is drawn directly from the submitted SSLP.

In response to comments made to the hearing about the need to ensure provision of jobs as well as housing paragraph 8.19 continues by confirming the opportunities that exist within the Core Strategy for provision of some 40,000sq m. of employment land .In conclusion the council considers that this is a very specific and positive outcome of its engagement with the LEP/ SEP process and the duty to cooperate across county with business interests as well as all other constituent local authorities. An outcome which – from the very level of detail contained within the draft SEP is clearly linked to the Strategic Sites Local Plan and one that could not have occurred without very close engagement with the LEP. Please see in particular pages 98 and 99 of the appendix which give a very clear picture of proposed strategic growth not only for Wealden but also across each of the constituent Local authorities – working collaboratively and aligning with the LEP process .

Further evidence of SEP engagement is then found in the document at paragraph 8.23 and under the Heading Infrastructure. Within the following table there is a list of a package of infrastructure investments now identified at LEP level to help unlock growth potential .These include reference to a package of 5 junction improvements " to the north of Eastbourne , as referred to by Mr R. New at the Hearings and which reflect the identified needs of the South Wealden and Eastbourne (SWETS) studies, the Movement and access studies for Hailsham / Hellingly (MASHH) and those for

the Polegate's movement and access studies (PMAS) – also referred to at the Hearings by Mr New of ESCC and Mr. A Watkin's. Pages 36 – 38 of the attached appendix , entitled " Major Transport Schemes submitted to DfT as SELEP priorities underline a number of these key elements of infrastructure referred to at the SSLP examination – and also in respect of those in other East Sussex authorities as a prime example of joint collaborative working across all authorities .

There is also specific mention in the table referred to for a number of local transport improvements including the bus priority measures referred to in the Hearing sessions for Eastbourne and South Wealden. These again show good examples of full engagement with the LEP – which has a wide range of business interests represented on the SELEP Board , as well as positive outcomes in identifying these needs in the SEP as now submitted to Government. Page 41 of the Appendix identifies very clearly non transport schemes that are employment related and are very obviously aligned with the proposals that have formed part of the Hearing sessions for the SSLP examination .

At paragraph 8.24 of this SEP(East Sussex Chapter) at bullet point two is clear reference to the identified allocations for growth within the submitted SSLP- the A22 Growth Corridor enterprise area – which includes not only Eastbourne Borough Council's Sovereign Harbour proposals but each of the Strategic Sites for this growth corridor – namely, Polegate, Hailsham and Uckfield.

We have attached only a sample of Team East Sussex meetings to show the close level of engagement across County with the LEP. The TES minutes of 7th Feb (page 86 of appendix) at agenda item 2.5 identify an item for input to the SEP from all parties, the TES agenda for 7th April (page 108) similarly identifies at agenda item 3 the importance of input to the SEP and at December 2013 is a matrix of key infrastructure priorities for the Wealden area as identified to the county as coordinating the wider response and input to LEP and the draft SEP. All TES meeting notes and agendas are available on request from D. Evans(LEP project support officer) at ESCC dave.evans@eastsussex.gov.uk

Following the recent move to the federated LEP model these minutes and agendas will be made available on the ESCC website .Also attached to this note is the ranked prioritised list for infrastructure investment to support growth in East Sussex as agreed at TES and as requested by SELEP.

Wealden specifically responded to the SEP consultation and a copy of the relevant portfolio report together with it's Appendices are also attached to this note as pages 92-94 of the Appendix). This report was shared with all TES Members in order to ensure a concerted argument could be put forward on the basis of the growth identified in the area and the need for infrastructure investment and prioritisation across county which could then be reflected within the SEP.

These various levels of continued engagement with the LEP have enabled and strengthened the recent countywide and coordinated bids to the SELEP under RGF for the various transport schemes referred to by Mr Wheeler of the Highways Authority at the hearing sessions and when he confirmed that the county was expecting a response from Government by July of this year.in conclusion the Council believes that it has shown that it has satisfactorily discharged its Duty to Cooperate , not only with neighbouring Authorities as required by the legislation but also by close engagement with the business community commencing with the early " Issues and

Options" publication for the SSLP but also with the LEP and the emerging draft SEP which is clearly by it's content shaped by the Councils adopted Core Strategy and submission SSLP as evidenced by the east Sussex Chapter of the SEP itself.at page 84 of this appendix is a matrix identifying the final prioritised list of East Sussex projects that was submitted at SELEPs request. The final ranked list at ranked numbers 1,2,10,15, 16, 24, and which relate to growth proposed within Wealden's SSLP are in the Council's view very clear examples of extremely positive outcomes from its duty to cooperate approach and also of close and obvious engagement with the LEP and commercial interests.

Marina Brigginshaw 20th June 2014

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EAST SUSSEX STRATEGIC PLANNING MEMBERS GROUP

Notes of the meeting held on Monday, 8th December, 2014 in Civic Community Hall, Vicarage Lane, Hailsham BN27 2AX (1.00 p.m. to 2.32 p.m.)

PRESENT:

Authority:	Members of the Group:	Supporting Officers:
Wealden District Council	Cllr Ann Newton (Host Chairman)	Marina Brigginshaw Nigel Hannam Sarah Lawrence
Eastbourne Borough Council		Craig Steenhoff
East Sussex County Council	Cllr Rupert Simmons	Ellen Reith Tony Cook
Lewes District Council		Edward Sheath
Rother District Council		David Marlow

Other Attendees: Councillor Phelim MacCafferty and Rob Fraser of Brighton and Hove City Council.

APOLOGIES: Apologies for absence were received from Cllr S Wallis (Eastbourne), Cllr C Maynard, Mr P Chowney, Cllr T Jones, Cllr S Wallis, Cllr P Osborne and Mr A Shaxson and Ms Lucy Howard (South Downs), and Mr Charlie Lant (Wealden).

14/14. WELCOME

Councillor Ann Newton welcomed participants to the meeting.

14/15. NOTES OF THE LAST MEETING

The notes of the meeting held on 21 July 2014 were agreed.

14/16. DEVELOPMENT OF A COMMON EVIDENCE BASE AND POLICY DIRECTION IN RELATION TO TOPIC-BASED POLICIES

Robert King presented the progress report on the common policy issues work programme. It was noted that none of the work areas had yet reached final recommendations. Robert King highlighted the progress on each:

- *Development in the High Weald AONB* – guidance notes had been produced on a range of relevant matters.
- *Biodiversity / Green Infrastructure* – no further progress had been made

since the production of a Green Infrastructure Study, but East Sussex was continued to work with individual authorities on green infrastructure requirements in relation to individual site allocations in local plans.

- *Renewable Energy* – due to the breadth of subject matter, the group had sub-divided the work into solar energy, wind energy and other renewable energy, and was producing guidance / issues papers on all areas.
- *Community Facilities – t*he initial conclusion had been that as each Authority's Core Strategy included a different definition, it would not be possible to come to a common policy on this issue.
- *Older People's Housing* – work to date had shown that each Authority was likely to have a separate policy in relation to Older People's housing. The County Council had provided detailed demand mapping work to each District / Borough and the National Park Authority, which would be required as an evidence base if Authorities wished to make accessible and adaptable housing a requirement of planning applications.
- *Tourism Facilities* – the initial scoping work had finished and existing policies and evidence base were identified. A meeting would be held early 2015 for all Authorities to review the findings and agree a way forward.
- *Equestrian Development – the* work had shown that most Authorities' policies were aligned, but with some additional work required on interpretations of 'small scale' development, issues of adequate pasture, and policies for domestic and commercial properties.

Robert King confirmed that a further update and recommendations would be brought to a future meeting.

Members of the group confirmed that although this work was taking time, it had been worthwhile for building understanding of different Authorities' approaches, for highlighting key issues across the County, and for assisting individual authorities to identify where their own evidence base should be strengthened.

The Group agreed to note the progress of the work on the development of a common evidence base and policy direction for local plans.

14/17. HOUSING UPDATE

David Marlow introduced the report on housing provision issues across the wider region, and on the delivery of housing locally.

The Group discussed the representations being made to the Greater London Authority on the London Infrastructure Plan. Two letters had been written from the Group, highlighting the need for south east authorities to have an input into future plans for housing in the region, resulting from the Local Plan. Councillor Newton had attended a meeting of South East England Councils (SEEC) and was on a task and finish group, and offered to circulate to other members of this group, the terms of reference. The intention was to present the task and finish group's recommendations to the SEEC Board in March 2015.

In addition, there was an emerging officer group, and it was agreed it would be helpful for this to include an officer from one of the East Sussex Authorities.

Councillor MacCafferty, advised that Brighton and Hove Council, would be happy to assist with this matter. He confirmed that the Council was facing similar issues, with the requirement from inspectors to find additional housing land, whilst being prevented from using particular areas of land for development such as protected greenbelt. This was also an issue being raised by outer London boroughs, such as Bromley and Croydon. He confirmed that the Greater Brighton partnership group were in discussions with several London Boroughs on these issues.

The Group agreed that it was important to work together to look at the issue, and that co-operation continued to be key.

The Group went on to discuss where different Authorities were with delivery of housing. It was recognised that there were housing targets in each of the respective local plans, with different start and end dates. David Marlow tabled a copy of a graph showing projected housing completions across East Sussex, and by authority area, up to 2027. The Group highlighted that completions would depend not only on land availability, but also whether developers could deliver that level of development, and funding availability, but this was not recognised by Inspectors for target setting. The projections would change when the South Downs National Park Authority's count was included, but provided a useful background to strategic infrastructure plans.

It was noted that Authorities were treating 'windfall' development in different ways, as to whether it counted against housing requirements. This was particularly difficult for Authorities without an adopted Core Strategy or Local Plan.

Of all the Authorities in East Sussex, Wealden District Council was the only one with a requirement for an early review of housing needs. Marina Brigginshaw advised on its work on strategic housing market assessments, in liaison with other Authorities. She confirmed that the majority of Wealden's strategic site allocations already had consents, but were not yet built out.

Both Eastbourne and Brighton and Hove Council's highlighted the difficulties they had with land banks being held and not released by owners for development, due to lower land values, and that this could have an effect on housing delivery.

It was noted that the Government was due to issue information on commuting flows into the area, and this would have an impact on the assessment of housing market areas.

The Group agreed to:

1) Note and endorse the action taken in response to the emerging London Infrastructure Plan; and
2) Note the respective Local Plan Housing targets and the anticipated housing trajectories.

14/18. DEVELOPMENT OF THE STRATEGIC INFRASTRUCTURE PLAN

Marina Brigginshaw presented a report summarising the responses to the Group's consultation regarding the definition of 'strategic' or 'significant', in relation to infrastructure planning.

The Group had agreed a discussion paper for consultation in July 2014, and this had been sent to all infrastructure providers and authorities for comment by the end of October, with a supporting workshop held on 30 September. The report summarised the responses received, and concluded that the same criteria of 'significant' would not fit all organisations. Based on the responses, it was recommended that an approach was followed which acknowledged where issues were common and where the infrastructure required would support the development strategies of two or more areas it was to be defined as significant, taking into account a checklist of seven criteria set out at paragraph 6 of the report.

The next stage would be to create a draft Infrastructure plan, in consultation with all East Sussex Authorities and wider, and in discussion with all the infrastructure providers. It was recognised that identifying the resources for infrastructure development would be challenging. The intention was to produce the draft plan within 6 months.

Councilllor Simmons highlighted the key role that the Local Enterprise Partnerships (LEPs) provided to infrastructure development, and both he and Nigel Hannam provided a link to the LEPs from this Group. It would be important to take into account infrastructure needs across borders. Councillor Simmons advised that early indications were that all the major parties for the General Election were supporting the continuation of LEPs, although funding streams could well change.

Marina Brigginshaw advised that Wealden District Members were working with the Clinical Commissioning Groups regarding infrastructure needs and delivery, there was scope for employment land trajectory work, and there had been recent meetings between the Planning Managers and Economic Development Officers Group, and all this would contribute to the development of the draft infrastructure plan.

It was agreed that this was a really useful piece of work.

The Group agreed to:

1) Note the consultation responses;
2) Agree the proposal for the definition of significant impact; and
3) Agreed the arrangements for the development of the Strategic Infrastructure Plan.

14/19. WEALDEN DISTRICT COUNCIL AFFORDABLE HOUSING DELIVERY LOCAL PLAN

Members of the Group were invited to comment, without prejudice, on Wealden District Council's Proposed Submission Affordable Housing Delivery

Local Plan.

It was noted that this had been developed as a single policy local plan, due to a delay in the Council's Strategic Sites Local Plan. It was recognised that the Government guidance issued in the last few days, might require the Council to go out for a further round of consultation.

The Group discussed the key questions raised for Wealden in relation to affordable housing thresholds, differing thresholds for urban and rural areas, and options for taking a commuted sum in place of provision from developers. David Marlow highlighted similarities and differences for Rother District Council's approach.

It was suggested that a future area of joint work for this Group could be to look at policies on negotiating commuted sums methodology and calculations.

It was asked if social providers might prefer social rented provision. Marina Brigginshaw advised that each calculation would be on a site by site basis on what was needed. The Council was achieving above 35% affordable housing on some existing sites, and the CIL viability would take into account higher levels. The key was to future-proof the policy, and therefore achieve affordable housing, but with a flexible approach.

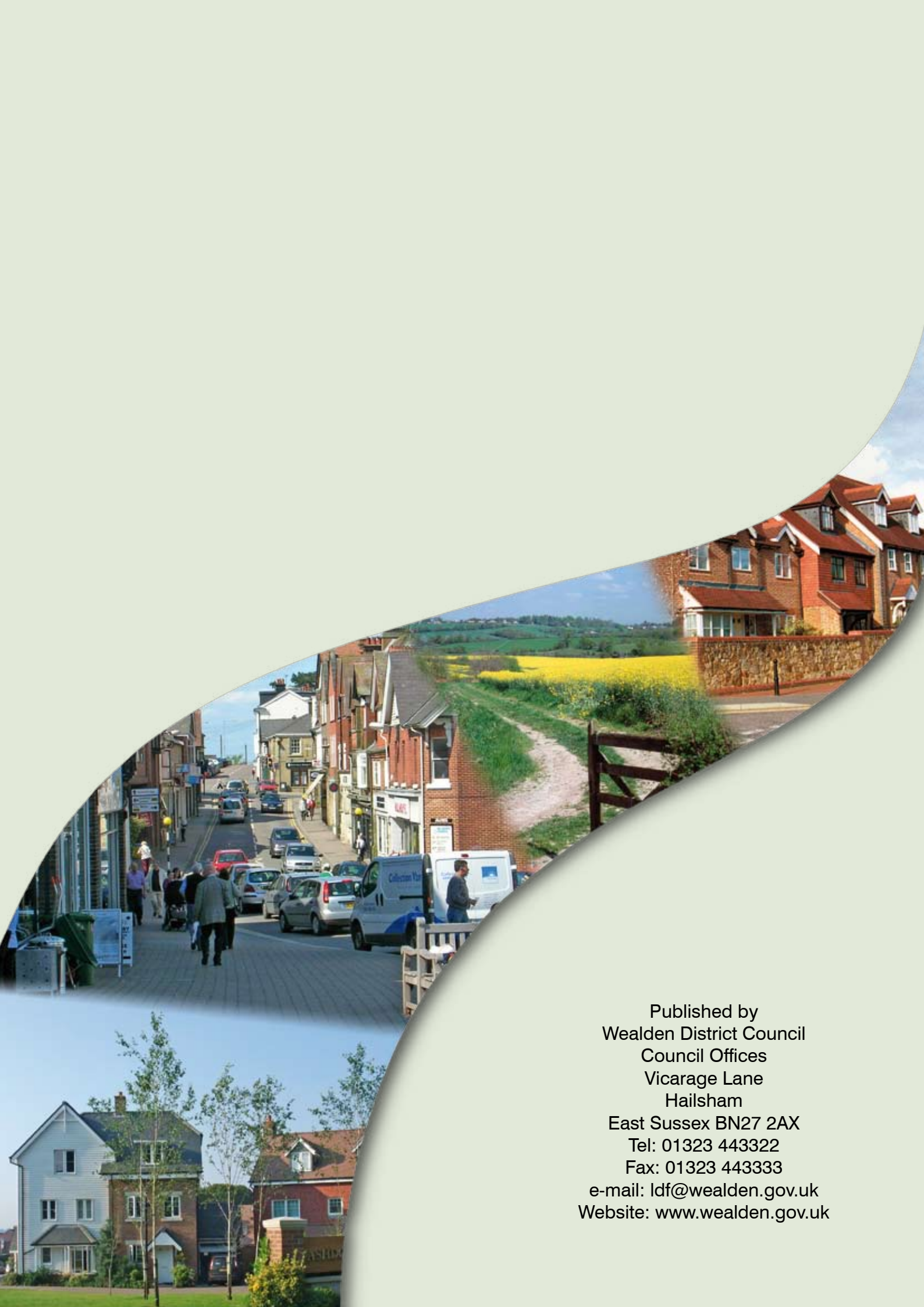
The Group agreed to note the policy contained within the Wealden District Proposed Submission Affordable Housing Delivery Local Plan for comment.

14/20. DATE OF NEXT MEETING AND WORK PROGRAMME

It was agreed that the next meeting would be held in March, on a date to be identified.

The Local Plan Managers Group would update the Work Programme ahead of the next meeting, to include revised target dates for each of the workstreams.

Councillor Ann Newton
Chairman



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