WEALDEN DISTRICT COUNCIL

LOCAL DEVELOPMENT FRAMEWORK

'PROPOSED MODIFICATIONS TO THE
CORE STRATEGY DEVELOPMENT PLAN DOCUMENT'
(APRIL 2012)

REPRESENTATIONS
ON BEHALF OF
SUMMERTREE ESTATES LTD

June 2012

BARTON WILLMORE
Planning · Design · Delivery

WEALDEN DISTRICT COUNCIL
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1.0 INTRODUCTION

i) Purpose of Representations

1.1 These representations have been prepared on behalf of Summertree Estates Ltd and set out comments in respect of the 'Proposed Modifications to the Core Strategy Development Plan Document' (April 2012) (PMCS). Summertree Estates has residential land interests in North West Heathfield, known as 'Land to the rear of the Police Station, High Street, Heathfield' hereon in referred to as 'the Site'.

1.2 Notwithstanding our Client's specific land interests, these representations have been prepared in objective terms and assessed against the prevailing planning policy framework, now being the National Planning Policy Framework (NPPF) which was published on 27 March 2012 and post-dates the Inspector's Interim Report and proposed 'Main Modifications' (05 March 2012). The NPPF has cancelled all relevant Planning Policy Statements/Guidance in relation to the Core Strategy DPD, in particular PPS7: Sustainable Development in Rural Areas and PPS12: Local Spatial Planning.

1.3 The PMCS comprises two parts, namely, the proposed 'Main Modifications' by Wealden District Council (WDC) as set out in Section 2 of the PMCS and the proposed 'Main Modifications' by the Inspector as set out in Section 3. For the purposes of clarity, these representations relate solely to the Inspector's 'Main Modifications' as set out in Section 3, and particularly, the modification to 'delete' Strategic Development Area 11 : Land at North West Heathfield from the Core Strategy and 'defer' any allocation at Heathfield to a subsequent Development Plan Document.

1.4 In reviewing the NPPF, it is evident that the policy guidance relating to the 'major' release of AONB is contained within Paragraph 14 (inc. footnote 9), and Paragraph 116. This states:

> *14. At the heart of the National Planning Policy Framework is the **presumption in favour of sustainable development**, which should be seen as a golden thread running through both plan-making and decision-taking.*
>
> *For **plan-making** this means that:*
> - *Local planning authorities should positively seek opportunities to meet the development needs of their area;*

- *Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change, unless:*
  - *Any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole; or*
  - *Specific policies in this Framework indicate development should be restricted.*[9]

*For **decision-taking** this means:*[10]

- *approving development proposals that accord with the development plan without delay; and*
- *Where the development plan is absent, silent or relevant policies are out-of-date, granting permission unless:*
  - *Any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole; or*
  - *Specific policies in this Framework indicate development should be restricted.*[9]

[9] *For example, those policies relating to sites protected under the Birds and Habitats Directives (see paragraph 119) and/or designated as Sites of Special Scientific Interest; land designated as Green Belt, Local Green Space, an Area of Outstanding Natural Beauty, Heritage Coast or within a National Park (or the Broads Authority); designated heritage assets; and locations at risk of flooding or coastal erosion.*

[10] *Unless material considerations indicate otherwise.*

116. Planning Permission should be refused for major developments in these designated areas except in exceptional circumstances and where it can be demonstrated they are in the public interest. Consideration of such applications should include an assessment of:

- *the need for the development, including in terms of any national considerations, and the impact of permitting it, or refusing it, upon the local economy;*
- *the cost of, and scope for, developing elsewhere outside the designated area, or meeting the need for it in some other way; and*
- *any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated.*

1.5 The 3 No. bullet point criteria to justify any 'major' AONB release has been carried into the NPPF (para. 116) from PPS7 (para. 22). The NPPF (para. 116) criteria are identically worded, and maintain the importance of protecting the AONB. The NPPF (para. 116) also maintains the opportunity to locate 'major' development in the AONB, if exceptional circumstances exist, and subject to the 3 No. bullet point criteria being assessed and met. We consider such exceptional circumstances exist in Heathfield and therefore the restriction placed upon the 'presumption in favour of sustainable development' in NPPF para 14 does not apply.

1.6 These representations provide WDC and the Inspector with a brief assessment of the 3 No. criteria required to be considered as part of any 'major' AONB release.

2.0 INSPECTOR'S 'MAIN MODIFICATIONS'

2.1 We would like WDC and the Inspector to note that we **object** to the Inspector's 'Main Modifications' to delete SD11: Land at North West Heathfield from the Core Strategy (and reduce the overall housing numbers accordingly). There are two primary reasons for this objection:

i) We do not consider that 160 dwellings at SD11: Land at North West Heathfield would constitute 'major' development in the context of the former PPS7 and the now NPPF and 'national considerations'. There is no definition of 'major' in this national context and we note that the Council confirmed to the Inspector at the Examination Hearing Session relating to Heathfield, that the Council considers this to be 'minor' development. By way of example, we understand a Site Allocations DPD Examination for the town of Holt, North Norfolk debated this issue in 2010. In that particular circumstance, a development of 100 dwellings was not considered 'major' development in the AONB and went onto be allocated and subsequently planning permission granted.

ii) We consider that a significant amount of the existing WDC Core Strategy Evidence Base already justifies 'major' AONB release when set against the NPPF (para. 116) criteria for such release.

2.2 However, we are satisfied the Inspector considers an allocation in Heathfield can be made by WDC in a subsequent DPD and recognises there is a 'need' to deliver a scale of housing growth in the town that is considered to be 'major', subject to a more rigorous assessment being made.

2.3 We are pleased to see the Inspector recognises that the *'AONB boundary has been tightly drawn around the town'* and that the '*SDA has advantages in terms of its proximity to the town centre and has been identified in the SHLAA process as a result of which it has been selected over other sites identified as potentially suitable which are also all in the AONB'* (para. 27 of Inspector's Interim Report dated 05 March 2012).

2.4 If the Inspector is minded to continue to pursue the 'deletion' or in practice, the 'deferral', of an allocation, then we consider the appropriate DPD to allocate land in Heathfield should be the 'Strategic Site DPD' (SSDPD) and not the later 'Site Allocations DPD' as identified in the WDC Local Development Scheme. We consider that this should be made explicit within the Core Strategy.

2.5 We consider that, as currently worded the Inspector's Main Modifications, as set out under MM17, MM25 and MM30 do not provide for clarity with regards to identifying the appropriate DPD in which to pursue an allocation. We consider this could further delay the delivery of housing in Heathfield.

2.6 We propose the following amended wording to the Inspectors recommendations:

Ref	**Page**	**Policy/ Paragraph**		**Main Modification**
MM17	26	WCS2	Inspector Modification	*Table, Heathfield and Waldron row- under 'New allocations (dwellings)' delete* "~~160~~*" and insert* "To be determined in a subsequent DPD"
			Barton Willmore Proposed Amendment	*Table, Heathfield and Waldron row- under 'New allocations (dwellings)' delete* "~~160~~" *and insert* "To be determined in ~~a subsequent~~ the Strategic Sites DPD"
MM25	32	5.16	Inspector Modification	Amend 5th Bullet Point:"~~Development~~ ~~a~~At Heathfield ~~(SD11) will be phased for early in the plan period and this will enable much need social housing to be provided~~ consideration will be given in a subsequent DPD to the identification of housing site shaving regard to national policy on AONBs and any opportunities for redevelopment within the town. Any housing land identified will be in addition to the overall District provision of 9440 dwellings," *(The Council's proposed modification would delete this bullet point but the above wording would replace it)*
			Barton Willmore Proposed Amendment	Amend 5th Bullet Point:"~~Development~~ ~~a~~At Heathfield ~~(SD11) will be phased for early in the plan period and this will enable much need social housing to be provided~~ consideration will be given in ~~a subsequent~~ the Strategic Sites DPD to the identification of housing site shaving regard to national policy on AONBs and any opportunities for redevelopment within the town. Any housing land identified will be in addition to the overall District provision of 9440 dwellings," *(The Council's proposed modification would delete this bullet point but the above wording would replace it)*

MM30	50	6.42	Inspector Modification	*Sub paragraph 3* "meeting the housing and community needs of Heathfield by seeking to identify appropriate ~~allocating deliverable housing sites for around 160 homes on land adjacent to the urban area to the north west of Heathfield (SD11). S~~sites for housing development ~~within this broad location will be identified and phased~~ through the Site Allocations DPDs."
			Barton Willmore Proposed Amendment	*Sub paragraph 3* "meeting the housing and community needs of Heathfield by seeking to identify appropriate ~~allocating deliverable housing sites for around 160 homes on land adjacent to the urban area to the north west of Heathfield (SD11). S~~sites for housing development ~~within this broad location will be identified and phased~~ through the Strategic Sites ~~Allocations~~ DPD~~s~~."

2.7 We consider the 'Strategic Site DPD' is necessary to be specifically referenced in the Core Strategy as this is the DPD which is being progressed first by WDC and assures the delivery of an allocation in Heathfield in an expedient manner. It is anticipated by the WDC Local Development Scheme to be adopted in March 2014.

2.8 In referencing the SSDPD, the Core Strategy will provide for certainty to the local community, the Heathfield and Waldron Parish Council and other interested bodies (such as the Heathfield Partnership Trust) that a suitable and sufficient allocation can be made in Heathfield in the next stage of the LDF process. This is an important factor to the local community and was demonstrated at the committee stages prior to the Core Strategy Pre-Submission document being finalised. At that time, the Parish Council requested WDC reconsider the timing of the allocation coming forward to 2015/16 moved forward from the original timing of 2022 due to the urgent need to deliver housing in Heathfield now. This should hold significant weight in the Inspector's conclusion on this matter.

2.9 It is evident through the WDC CS Evidence Base that there is a significant need for housing (both Market and Affordable) in Heathfield presently. This was discussed at the Examination Hearing Session for Heathfield, whereby it was confirmed that there had been no delivery of Affordable Homes in Heathfield in the last 10 years. We also consider that a large proportion of the Evidence Base to justify any 'major' AONB release has indeed already been undertaken, albeit not 'rigorously assessed' to the satisfaction of the Inspector. We therefore consider that the appropriate AONB assessment/Evidence Base can be produced and justified in accordance with the 'Strategic Site DPD' timetable.

2.10 We consider that there could also be significant delays to the delivery of the SDA's that fall within 7km of the Ashdown Forest SPA/SAC. This includes the main towns of Crowborough and Uckfield, leaving Heathfield as the only remaining town in the North of the District outside of the 7km Ashdown Forest SPA/SAC. Due to this current uncertainty and WDC's current position with regards to any development in within 7km of the Ashdown Forest, we consider greater emphasis is now placed upon Heathfield to be in a position to deliver housing growth to meet the present housing needs. In order to facilitate this, the Core Strategy should be explicit in identifying the 'Strategic Sites DPD' as the document in which an allocation in Heathfield can be made.

3.0 NPPF AONB ASSESSMENT

3.1 Since the Inspector's 'Main Modifications' were issued (05 March 2012), the National Planning Policy Framework (NPPF) has been published (27 March 2012). This has cancelled PPS7 (including para. 22) which the 'Main Modifications' refer to. However, the NPPF (para. 116) has carried forward the 3 No. criteria to rigorously assess any 'major' AONB release as advocated in PPS7.

3.2 In order to demonstrate the suitability of an allocation in Heathfield, the 3 No. criteria as set out in NPPF (para. 116) must be assessed should the development be considered 'major'. Notwithstanding this new guidance, a significant amount of evidence base has already been produced by WDC and/or interested parties to demonstrate the suitability and delivery of the growth location in Heathfield. The 3 No. criteria are referenced in para. 1.4 above.

3.3 The following seeks to address NPPF Paragraph 116: Criterion i) '*The need for the development, including in terms of any national considerations, and the impact of permitting it, or refusing it, upon the local economy.'*

a. Need for the development including in terms of National Considerations

3.4 The 'need' for the development falls into a number of categories including the overall 'need' responding to population growth and demographic change as well as the 'need' for Affordable Housing.

3.5 The level of overall growth has been extensively assessed as part of the Core Strategy Examination and forms a large proportion of the Inspector's Interim Report. It is clearly evident that there will be a significant demographic change in population (up to 12,121 households to 2030) that will not be fully met through Core Strategy (proposing only 9,440 dwellings if the Inspector's Modifications are adopted). Whilst this approach is to be justified in the context of the protected environments in the District (SPA in the north and SSSI's in the south), as well as significant infrastructure constraints, the overall 'need' of housing in the District will always be more than has been planned for within the Core Strategy and forever present within the Plan Period.

3.6 With regards to Affordable Housing, there is a recognised District wide need for 812 homes per annum (albeit this does not directly relate to 'new' homes). The Evidence Base to support this figure has a base date of June 2010 (see Appendix 1 of WDC 'Background Paper 2: *Managing the Delivery of Housing'*), which also identified a figure of 112 households in Heathfield. Appendix 3 of 'Background Paper 2' also identifies that there are 0 (zero) No.

Affordable Units that are identified as 'Undelivered Affordable Units that have planning approval as at 1 April 2010'.

3.7 In March 2012, WDC provided Summertree Estates Ltd with an up-to-date Affordable Housing Register for Heathfield (see **Appendix 1** of this representation). This identified that a total of 176 applicants (note: an applicant can involve more than 1 individual) are on the Affordable Housing Register who have expressed an aspiration to live in Heathfield (note this is an increase from the 112 previously identified in Appendix 1 of WDC 'Background Paper 2'). Of these 176 applicants, 50 applicants have been confirmed as having a local connection to Heathfield and Waldron and a further 28 applicants are pending this confirmation as having a local connection (i.e. still to provide further information to demonstrate they have a local connection). A further 98 applicants have specified Heathfield and Waldron as their first choice area to live in, but do not necessarily have a local connection.

3.8 This evidence clearly demonstrates the 'need' exists both on a District wide level and at a more local level to deliver housing in Heathfield and this is recognised in para. 27 of the Inspectors Interim Report dated 05 March 2012.

3.9 With regards to 'national considerations', the publication of the NPPF provides clear guidance that there is to be a 'presumption in favour of sustainable development'. This is seen as the 'golden thread' through the framework and demonstrates the Governments intentions to promote sustainable development.

3.10 It is considered the SDA11 growth area, and particularly the site known as 'Land to the rear of the Police Station, High Street, Heathfield', represent a highly sustainable location. This is due to the proximity of the site to the town centre, which is within 100 metres and sits on existing public transport links which has been recognised by the Inspector in para. 27 of the Interim Report dated 05 March 2012 '*the SDA has advantages in terms of its proximity to the town centre'.*

3.11 Heathfield is a sustainable location in its own right and as such, is a suitable settlement to locate development which in turn, will support existing services and facilities. It is considered that SDA11 represents one of the most sustainable Strategic Development Areas being promoted within the Core Strategy.

b. <u>The impact of permitting it, or refusing it, upon the local economy</u>

3.12 With regards to the impact on the local economy, one of the main Government objectives as set out in the Ministerial Statement for Growth (23 March 2011) and the NPPF (para. 18) is to

secure economic growth in order to create jobs and prosperity. Without the delivery of a significant allocation in Heathfield, the vitality and vibrancy of the town centre could be compromised. The Heathfield Partnership Trust and Heathfield and Waldron Parish Council have actively sought to improve the economic output of the town centre and a key component of the future success of this is the delivery of sustainable development.

3.13 An Economic Benefits Statement has been prepared which details the likely economic benefits that could arise from the delivery of 160 dwellings at Heathfield **(Appendix 2**) and its associated future residents. The growth of 160 dwellings could generate an additional population of 362 people of which 46% will be economically active. This will generate approximately:

- £2.3 million per annum in Gross Value Added terms;
- £800,480 per annum in convenience goods expenditure;
- £1,277,280 per annum in comparison goods expenditure;
- £775,520 per annum in leisure goods and services expenditure, (the majority of which will be spent in the local economy i.e. Heathfield.);
- £1,624,611 New Homes Bonus for the Council (inc. County) over the next 6 years.

3.14 The above figures provide for an indication of the likely contribution that future residents could input into the local economy as a result of living in Heathfield. This is essential to the continued vitality and viability of the town centre. It is therefore considered that if strategic growth does not take place in Heathfield, the above economic benefit will be lost.

3.15 The following seeks to address NPPF Paragraph 116: Criteria ii) *The cost of, and scope for, developing elsewhere outside the designated area, or meeting the need for it in some other way.*

a. <u>Cost of and Scope for development elsewhere outside the designated area</u>

3.16 In order to develop outside the designated AONB area, we consider there are 3 No. alternative options:

a) Develop pockets of Non-AONB land outside, but adjacent to the settlement boundary of Heathfield;
b) Identify sufficient sites within the settlement boundary of Heathfield; or
c) Locate development some distance from Heathfield outside the High Weald AONB.

3.17 In order to rely upon sites adjacent to or within Heathfield itself (i.e. options a) and b) above) they need to be based on a robust assessment and identifed as 'deliverable' i.e. 'available, 'suitable' and 'achievable'. The current WDC SHLAA Evidence Base clearly demonstrates that the only sites that were identified as 'deliverable' that were either within the town or in non-AONB locations were in SD11: Land at North West Heathfield. All other sites identified considered 'suitable' within the WDC SHLAA are within the AONB. As such, the principle of locating development at Heathfield requires the release of AONB land of sufficient scale in order to meet the identifed need (as established above in Criterion 1).

3.18 There are a small number of potential sites (some previously developed) that lie outside of, but adjacent to the AONB boundary. The AONB boundary around Heathfield is not considered to always follow a logical manner where it meets the settlement boundary. Nevertheless, the 'pockets' of non-AONB land are limited by either some, or all of the following list which is by no means exhaustive:

- Size;
- Location;
- Deliverability;
- Landscape impact;
- Technical constraints;
- Sustainability;
- Impact on more sensitive environments (Historic Parks/SSSI etc).

3.19 The AONB washes completely over all settlements in the High Weald AONB except for Tunbridge Wells, Crowborough and Heathfield. As such, the High Weald AONB is an extensive designation which extends approximately a further 2.5km to the south of Heathfield. The consequence of this is that no development can be located near to Heathfield in non-AONB locations.

3.20 This is also applicable to a number of village locations identified for growth in the WDC Core Strategy 'Policy WCS6: The Rural Areas Strategy'. In total, 115 No. dwellings have been identified in three locations in the High Weald AONB. These are:

- Wadhurst 70 dwellings
- Frant 20 dwellings
- Cross-in-Hand 25 dwellings

3.21 A further 10 dwellings in East Dean (located in the Sussex Downs AONB) are also identified to be delivered in the WDC Core Strategy 'Policy WCS6: The Rural Areas Strategy'.

3.22 At present we consider the Inspector's proposed 'Main Modifications' do not apply the same principles to AONB development to the above named four locations (which fall wholly within an AONB designation), as they do for Heathfield.

3.23 Therefore, the 'cost of' finding an area that is outside the AONB designation, results in either:

- locating development in less sustainable rural locations (thereby not being compliant with the NPPF, which is seeking a presumption in favour of sustainable development); or
- locating development in other sustainable locations (such as Uckfield) that will not relate to Heathfield, will not meet the 'needs', including the 'needs' for people with a local connection and create additional pressure on locations that have already been identified for significant housing growth.

3.24 Furthermore, locating development in the nearest Town (Uckfield) will result in moving more development to within 7km of Ashdown Forest SPA/SAC. This will require increased SANGs provision and the potential for increased impacts of Nitrogen Deposition levels will not have been taken into account in the WDC CS Evidence Base: Appropriate Assessment (unlike the current provision for 160 dwellings in Heathfield which has been accounted for). Therefore, locating the additional dwellings towards the SPA/SAC, could result in an adverse effect on this European protected area as a result of protecting AONB release.

3.25 Locating development further South in the District will also have a negative effect. Not only will the need in Heathfield again not be met, but it will create additional pressure on infrastructure and environmental issues relating to the Pevensey Levels SSSI and Waste Water Treatment Works. Furthermore, para. 15 of the Inspector's Interim Report (05 March 2012) recognises that the 'transfer' of housing provision from one Sub Region to the other is unacceptable in the context of SEP Policy SCT5.

b. <u>Meeting the need for it in another way</u>

3.26 It is considered that there are no reasonable or realistic prospects for addressing the acute housing need in Heathfield in another way. The alternative options to deliver housing, such as 'Rural Exception Sites' or on small previously developed sites, has yielded very little Market Housing and no Affordable Housing in Heathfield in the past 10 years.

3.27 The opportunity to develop brownfield sites is limited in Heathfield and this is evidenced within the SHLAA which identified very few brownfield sites as being 'deliverable'. Of the sites that were identified, all comprise existing residential dwellings and their associated curtilages and form parts of larger SHLAA greenfield sites (all of which are located in the AONB).

3.28 Furthermore, with regards to the delivery of Affordable Units via the 'Rural Exception Sites' policy, it is evident that this policy does not deliver for Heathfield. This policy has been in existence for a number of years (via the Non-Statutory Local Plan) and therefore the opportunity to deliver such sites under this policy framework has been given. However, no such developments have come forward under this policy, and are unlikely to come forward in the emerging policy as set out in the Core Strategy.

3.29 We therefore consider the acute need (both Market and Affordable) cannot be met in another suitable or realistic way and the release of a strategic greenfield AONB site is necessary.

3.30 The following seeks to address NPPF Paragraph 116: Criteria iii*) Any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which it can be moderated.*

a. Any detrimental effect on the environment*, the landscape and recreational opportunities, and the extent to which it can be moderated.*

3.31 The effect on the environment through development at SD11: Land at North West Heathfield and specifically the site known as 'Land to the rear of the Police Station, High Street, Heathfield, will be rigorously assessed as part of an Environmental Impact Assessment (EIA). An EIA Screening Opinion has been provided by Wealden District Council confirming this to be the case. A copy of the EIA Screening Opinion can be found in **Appendix 3.** The EIA Scoping for such an assessment is currently being undertaken.

3.32 Notwithstanding this specific EIA, a Landscape Study has been undertaken by Barton Willmore Landscape Planning and Design which assesses the Site's impact on the overall landscape, as well as assessing alternative development locations in Heathfield. It demonstrates that the site has the capacity to accommodate and absorb development and avoid any material or significant adverse visual effects on the wider landscape. A summary of that Landscape Appraisal is provided in **Appendix 4**. Whilst this was dated September 2011 and therefore refers to now cancelled PPS's and the draft NPPF, the report does assess the site in the context of PPS7, of which the principles have been maintained in the NPPF.

3.33 It should also be noted that the topography of this location results in the most northern parts of 'the Site' (i.e. the area that extends furthest into the AONB), to be the lowest point of the 'the Site', thus resulting in a reduced visual impact as one moves 'into' the AONB. Due to the topographical variation, the northern lower lying part of the site is both visually and physically well contained and therefore visually less prominent from the AONB than the existing residential properties that front the High Street, and which lie on more elevated land and which, incidentally, lie outside of the AONB designation. In addition, due to 'the Site's' urbanised backdrop and context, it is not considered to be one of the most scenic areas of the AONB.

3.34 In this respect, the High Weald AONB Unit's representations to the recent WDC 'Strategic Site DPD Consultation' (January 2012) suggests that whilst it maintains it objection to any AONB release, it does provide for positive commentary on how SD11: Land at North West Heathfield could come forward if it is established that there is indeed sufficient justification for AONB release. The AONB Unit recognises that further work is required to establish design parameters and whilst it has suggested a way in which the area could be developed, it is recognised that this further work could yield an alternative option/design coming forward *'It is generally considered that further detailed design, and survey of the site is required to establish further parameters and constraints in regard to the specific siting and distribution of development across the site*[1]*.'*

3.35 With regards to recreational opportunities, 'the Site' provides limited opportunity for any strategic formal or informal recreational use. This is mainly due to the topography of 'the Site' not being suitable and that it is a private field. Furthermore, immediately adjacent to 'the Site' is the Heathfield and Waldron Millennium Green which is considered to provide a high quality amenity space and should be intensified and not 'competed' against for visitors. As such, the development of 'the Site' is likely to improve and enhance the use of existing areas of open space, namely the Millennium Green, in accordance with WDC Core Strategy Policy WCS13: Green Infrastructure.

[1] Extract from High Weald AONB Unit Representations to Strategic Site DPD Consultation January 2012

4.0 CONCLUSION

4.1 These representations have been submitted on behalf of Summertree Estates Ltd (Representor No. 104179) and relate to the 'Proposed Modifications to the Core Strategy Development Plan Document' (April 2012).

4.2 We **object** to the Inspector's proposed deletion of SD11: Land at North West Heathfield for the two primary reasons given in paragraph 2.1 of these representations, albeit we support the principle that an allocation can be made in a subsequent DPD.

4.3 We consider a significant amount of AONB Evidence Base has already been prepared that assesses the appropriateness of SD11: Land at North West Heathfield, albeit this does not specifically address the NPPF (para. 116) 3 No. criteria relating to the rigorous assessment of the 'major' release of AONB land to the satisfaction of the Inspector.

4.4 We consider the 3 No. criteria can be fully assessed and met (as set out in Section 3 of these representations) and the allocation of a suitable number of dwellings could be rigorously assessed and achieved in the 'Strategic Sites DPD'.

4.5 As set out in paragraphs 3.20 – 3.22 of these representations, we consider the Inspector's proposed 'Main Modifications' do not apply the same principles to AONB development for Wadhurst, Frant, Cross-in-Hand and East Dean as they do for Heathfield.

4.6 If the Inspector is minded to continue to 'defer' any allocation in Heathfield to a subsequent DPD, we consider the Core Strategy should reference the specific DPD that should undertake this allocation as being the 'Strategic Sites DPD'. This provides the earliest opportunity to allocate development that would meet the local community's aspirations for the delivery of homes in the short term.

4.7 We are aware of the local support for the proposed development, including the desire of the Heathfield and Waldron Parish Council and the Heathfield Partnership Trust to deliver a strategic allocation as envisaged within the Core Strategy. This should hold significant material weight in determining the appropriateness of continuing to maintain SDA11: Land at North West Heathfield within the Core Strategy and this has been recognised by the Inspector in para. 27 of the Interim Report dated 05 March 2012.

APPENDIX 1:

Affordable Housing Data

Andrew Wilford

From: Neil Harper <neil.harper@summertree-estates.co.uk>
Sent: 13 June 2012 09:28
To: Andrew Wilford
Subject: Heathfield - Housing Needs Figures for Heathfield and Waldron

----- Original Message -----
From: Stephen Marsden
To: neil.harper@summertree-estates.co.uk ; Dick Angel
Cc: John Scrace
Sent: Wednesday, March 28, 2012 10:44 AM
Subject: Housing needs figures for Heathfield and Waldron

Good Morning

Further to our telephone conversation, I can confirm the following:

There are currently 50 applicants on the Council's Housing Register with a local connection to Heathfield and Waldron. There are a further 28 applicants on the register who either do not have a local connection yet, or need to provide more information to the Council's Housing Options team in order to have a definite local connection. There are 98 applicants on the register who have specified Heathfield and Waldron as their first choice area to live in, but these do not necessarily have a local connection.

The figures quoted in the Core Strategy background paper are figures from the Housing Register from 2010. Numbers on the register are subject to change, and may go up or down depending on a number of factors.

The 110 applicants reference in the background paper were applicants who had stated Heathfield and Waldron would be their first choice area to live, rather than those with a local connection. At the time of writing the paper, Heathfield and Waldron was defined as a town, so affordable homes provided would not have been subject to the Council's rural lettings policy. Any applicant from the Housing register could 'bid' for the properties and would be assessed in order of priority band and time spent on the register without having to have a local connection.

Under the Council's new allocations policy, Heathfield and Waldron is no longer considered a town, so is subject to the Council's rural lettings policy. Priority will now be given to applicants with a local connection to the parish, therefore, when quoting housing need figures, the most appropriate figures to use are applicants with a definite local connection to the Parish.

Definition of local connection from the Council's Allocations policy:

For the purposes of the Council's Parish Lettings Policy, a local connection to the Parish is defined as meeting *one* of the following criteria:

People in need of separate affordable accommodation who currently live in the parish and have normally done so for a continuous period of at least **five** years.

People with close adult relatives (over the age of 18), generally defined as parents and adult children or siblings who live in the parish and normally have done so continuously for a period of at least **ten** years.

People who have lived in the parish for **five** years out of the last **ten** years and who had to move away from the parish because of a lack of affordable housing.

People who have 'established' employment within the parish, or have a genuine offer of established employment within the parish, which provides an important service to the local community and who need to live locally to carry out their duties.

Exceptional circumstances - where failure to reside in the parish would cause hardship to the applicant or others (to be agreed by the Housing Options and Strategy Manager on a case by case basis)

For the purposes of the Parish Lettings Policy, 'established employment' means:

A person employed on a permanent full time basis (37 hours) by an employer whose business or undertaking is located within the parish, or

A person employed on a permanent part time basis where the hours worked are not less than 16 hours per week by an employer whose business or undertaking is located within the parish, or

A person carrying out work on a self employed basis equivalent to or averaging not less than 16 hours per week where that person's business or undertaking is based within the parish.

I hope this helps

Stephen

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Wealden District Council

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Any views expressed are not necessarily the views of Wealden District Council unless stated.

APPENDIX 2:

Economic Benefits Statement

ECONOMIC BENEFITS STATEMENT FOR 160 DWELLINGS AT HEATHFIELD, EAST SUSSEX

ON BEHALF OF
SUMMERTREE ESTATES LTD

June 2012

BARTON WILLMORE
Planning · Design · Delivery

ECONOMIC BENEFITS STATEMENT
FOR 160 DWELLINGS
AT HEATHFIELD,
EAST SUSSEX

ON BEHALF OF

SUMMERTREE ESTATES LTD

June 2012

Ref: 17959/A5/DU/mg/djg
Date: 13 June 2012

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1.0 INTRODUCTION

1.1 This report has been prepared by Barton Willmore on behalf of Summertree Estates to assess if the economic benefits that are forecast to result if planning permission is granted for a scheme of up to 160 dwellings at Heathfield, Wealden.

1.2 This report provides an assessment of the economic benefits arising from the following sources:

- Employment and labour generation expressed as Gross Value Added ;
- Commercial Expenditure per annum on Convenience, Comparison and Leisure goods;
- New Homes Bonus generated over a 6 year period; and,
- Construction jobs;

1.3 The report provides for the planning policy context (Section 2) detailing the current emphasis of promoting the economy through the planning system, and draws upon central government empirical and statistical data (Section 3) to demonstrate how the scheme benefits the local economy, which should be considered as material weight in favour of the scheme.

2.0 PLANNING POLICY CONTEXT

i) National Planning Policy Framework (27 March 2012)

2.1 The NPPF is written in the context of achieving 'sustainable development' within three 'dimensions'; economic, environmental, and social, as follows:

> **"sustainable development is about positive growth – making economic, environmental and social progress for this and future generations."[1]** (our emphasis)

2.2 Specifically in respect of its economic dimension, the NPPF promotes strong growth in achieving the overarching objective of 'sustainable development'. In summary, the economic dimension of sustainable development is expected to provide the following:

> **"an economic role – contributing to building a strong, responsive and competitive economy, by ensuring that sufficient land of the right type is available in the right places and at the right time to support growth and innovation; and by identifying and coordinating development requirements, including the provision of infrastructure."[2]** (our emphasis)

2.3 In order to achieve 'sustainable development', the NPPF sets out 12 'core planning principles' which are intended to underpin both plan-making and decision-taking. The importance of residential development in achieving the wider economic growth aims of the NPPF is clear from these core planning principles. In this context plan-making and decision-taking should:

> **"proactively drive and support sustainable economic development to deliver the homes, business and industrial units, infrastructure and thriving local places that the country needs."[3]** (our emphasis)

2.4 In delivering sustainable development the NPPF confirms that the Government is committed to ensuring that the planning system does everything it can to support sustainable economic growth and that Planning should operate to encourage and not act as an impediment to sustainable growth. Significant weight should therefore be placed on the need to support economic growth through the planning system.

2.5 The role of residential development in achieving wider economic growth is clearly emphasised in the NPPF and one in which Wealden should support.

[1] Page i, Ministerial Foreword, National Planning Policy Framework, 27 March 2012
[2] Paragraph 7, page 2, National Planning Policy Framework, 27 March 2012
[3] Paragraph 17, page 5, National Planning Policy Framework, 27 March 2012

ii) Ministerial Statement for Growth (23 March 2011)

2.6 The ministerial statement 'Planning for Growth' of 23 March 2011 sets out how the planning system has a key role to play in rebuilding the country's economy, by ensuring that sustainable development needed to support economic growth is able to proceed as easily as possible. The Government's top priority in reforming the planning system is to promote sustainable economic growth and jobs and this is reflected in the NPPF. Local planning authorities are expected to make every effort to identify and meet the housing, business and other development needs of their areas.

2.7 The Statement is clear that in deciding whether to grant planning permission, local planning authorities should support enterprise and facilitate housing, economic and other forms of sustainable development. They should therefore:

> **"consider the range of likely economic, environmental and social benefits of proposals; including long term or indirect benefits such as increased consumer choice, more viable communities and more robust local economies (which may, where relevant, include matters such as job creation and business productivity)"[1]**

2.8 The statement concludes by stating that "Benefits to the economy should, where relevant, be an important consideration when other development-related consents are being determined."

iii) Core Strategy – Submission Document (May 2012)

2.9 Wealden Core Strategy Submission Document (CSSD) was published in August 2011. It sets out the vision to '**further support sustainable development, increase economic performance and the provision of employment opportunities'** within the District.

2.10 Heathfield is identified as one of the five main towns within Wealden District. It is recognised within the CSSD that Wealden's economic contribution is greater than other local authorities within East Sussex; but larger settlements outside the District exert significant influence in terms of jobs and other services. Given this it is clearly stated within the CSSD that the prospects of economic growth within the District are dependent on the ability to increase the number of economically active residents and skill set within the District. This report

[1] Paragraph 5, Planning for Growth, CLG, 23 March 2011

demonstrates that the Proposed Scheme at Heathfield will contribute to increasing the number of economically active residents within the area.

2.11 The CSSD sets out the spatial planning objectives which will be used to monitor the success of the Plan. Spatial vision SP04 states that the Council will `**ensure the long term viability of our five principal towns by supporting a range of improvements compatible with their local retail and service functions and reflecting the scope that exists for physical change within their centres'[4].**

2.12 Objective SP06 of the CSSD encourages the future development of Wealden's economy by supporting the growth of existing companies. The Proposed Application will support the long term viability of existing and future economic growth within the Heathfield area by contributing to the economically active population and therefore actively supporting local services and retail economy.

[4] Objective SP04, Wealden Core Strategy Submission Document, August 2011

3.0 ECONOMIC BENEFITS

INTRODUCTION

3.1 As set out above, if planning permission is granted for a scheme of up to 160 new dwellings at Heathfield, it is expected 35% will be set aside for affordable housing provision.

3.2 Based on an average household size within Wealden District Council of 2.26[5], the population generated by the proposed development would be 362 people.

3.3 In the context of National and Local Planning Policy, which seeks to promote strong economic growth both Nationally and locally in Wealden, this section sets out the key economic benefits that will be generated if the development is approved.

i) Construction jobs

3.4 Evidence presented by the House Builders Federation (HBF)[6] confirms that every new home built provides for 1.5 direct construction jobs. Using this figure, it is clear that the construction of 160 dwellings, as proposed, will generate 240 construction jobs.

ii) Gross Value Added (GVA)

3.5 GVA measures the contribution to the economy of each individual producer, industry or sector in the United Kingdom.

3.6 The UK Competitiveness Index (UKCI) prepared by the Centre for International Competitiveness benchmarks the competitiveness of the UK's region and localities, and provides a more detailed summary of economic productivity at local authority level. The UKCI confirms that the GVA Per Head within Wealden District totals £13,957[7] (see Appendix 2)

3.7 With reference to the official labour market statistics produced by Nomis (see Appendix 3), in 2010 the population of Wealden District was 144,100 people. The number of economically active people was 66,200 people, representing 46% of the population. On this basis we calculate that approximately 167 future residents (46%) of the Application Proposal will be in

[5] Average Household Size by Local Authority DCLG 2008 – see Appendix 1
[6] The labour needs of extra housing output: can the housebuilding Industry cope – extract attached in Appendix 6
[7] Centre for International Competitiveness, UKCL 2010 Datasheet – See Appendix 2

employment. The GVA generated by future residents of the Application Proposal will therefore total **£2.3m per annum** (based on 2010 values).

iii) Commercial Expenditure

3.8 Experian provide up to date retail and leisure expenditure data for all local authorities across the UK. Experian report[8] that the average household expenditure within Wealden District on convenience (food), comparison (non-food), and leisure goods and services is as follows:

- Convenience: £5,003 per household per annum;
- Comparison: £7,983 per household per annum;
- Leisure: £4,847 per household per annum;

3.9 On the basis of these figures we calculate that the provision of 160 dwellings will generate convenience goods expenditure of **£800,480** per annum; comparison goods expenditure of **£1,277,280** per annum; and expenditure of leisure goods and services of **£775,520** per annum; the majority of which will be spent in the town of Wealden.

iv) New Homes Bonus

3.10 The New Homes Bonus Calculator provided by the Department for Communities and Local Government confirms that the provision of 160 new homes (including 35% affordable provision), would equate to a New Homes Bonus of **£1,624,611** over a 6 year period, of which £1,299,689 would be a lower tier contribution to the local authority and the remaining £324,922 being an upper tier contribution to the County. This is set out in Appendix 5.

SUMMARY

3.11 This section sets out the potential economic benefits of the proposed development at Heathfield for Wealden. In summary this would comprise the following:

- Gross Value Added (GVA): £2.3m per annum;
- Commercial Expenditure: £2.85m per annum;
- New Homes Bonus: £0.27m per annum (£1.6m over 6 years).

[8] Experian Retail Planner Data, May 2012 – see Appendix 4

APPENDIX 1

DCLG 2008-BASED AVERAGE HOUSEHOLD SIZE FOR WEALDEN

APPENDIX 1:

DCLG 2008-BASED AVERAGE HOUSEHOLD SIZE FOR WEALDEN

2008-based household projections by average household size and year for Wealden

	2008	2009	2010	2011	2012	2013	2014
Wealden	2.288	2.277	2.266	2.255	2.243	2.231	2.221
South East	2.348	2.345	2.338	2.331	2.324	2.316	2.308
England	2.325	2.322	2.314	2.306	2.298	2.291	2.282

Source:Average Household Size by Local Authority DCLG 2008

APPENDIX 2

GVA PER HEAD, CENTRE FOR INTERNATIONAL COMPETITIVENESS, UKCL 2010 DATASHEET

APPENDIX 2:

GVA PER HEAD,

CENTRE FOR INTERNATIONAL COMPETITIVENESS, UKCL 2010 DATASHEET;

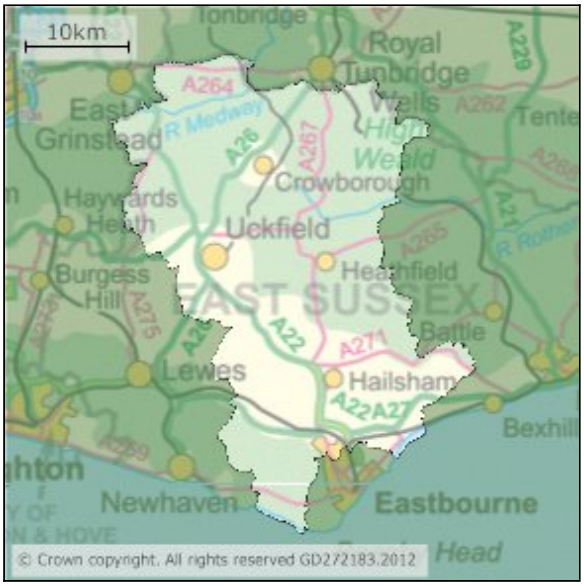
	GVA PER CAPITA			
	2006	RANK (380)	2007	RANK (380)
Eastbourne	17,060	163	17,734	170
Hastings	14,753	236	15,065	247
Lewes	14,369	251	15,282	238
Rother	11,942	338	12,352	340
Wealden	13,478	282	13,957	284

APPENDIX 3

NOMIS 2010 LABOUR MARKET PROFILE FOR WEALDEN

Labour Market Profile
Wealden

The profile brings together data from several sources. Details about these and related terminology are given in the definitions section.



RESIDENT POPULATION

Total population (2010)

	Wealden (numbers)	South East (numbers)	Great Britain (numbers)
All people	144,100	8,523,100	60,462,600
Males	69,300	4,183,200	29,758,900
Females	74,800	4,339,800	30,703,700

Source: ONS mid-year population estimates

Population aged 16-64 (2010)

	Wealden (numbers)	Wealden (%)	South East (%)	Great Britain (%)
All people aged 16-64	84,000	58.3	63.9	64.8
Males aged 16-64	40,900	59.1	64.8	65.8
Females aged 16-64	43,000	57.5	63.0	63.8

Source: ONS mid-year population estimates
Notes: % is a proportion of total population

LABOUR SUPPLY

Employment and unemployment (Oct 2010-Sep 2011)

	Wealden (numbers)	Wealden (%)	South East (%)	Great Britain (%)
All people				
Economically active†	66,200	75.8	79.2	76.1
In employment†	63,400	72.4	74.4	70.0
Employees†	47,600	56.7	63.6	60.5
Self employed†	15,700	15.7	10.4	9.1
Unemployed (model-based)§	3,000	4.5	5.9	7.9
Males				
Economically active†	37,100	85.9	85.2	82.4
In employment†	35,200	81.0	79.7	75.2
Employees†	22,200	54.5	65.2	62.0
Self employed†	13,000	26.6	14.2	12.8
Unemployed§	#	#	6.4	8.5
Females				
Economically active†	29,000	66.2	73.2	69.9
In employment†	28,200	64.2	69.2	64.9
Employees†	25,400	58.7	62.0	59.0
Self employed†	2,700	#	6.7	5.5
Unemployed§	#	#	5.4	7.1

Source: ONS annual population survey

Sample size too small for reliable estimate

† numbers are for those aged 16 and over, % are for those aged 16-64

§ numbers and % are for those aged 16 and over. % is a proportion of economically active

Economic inactivity (Oct 2010-Sep 2011)

	Wealden (level)	Wealden (%)	South East (%)	Great Britain (%)
All people				
Total	20,000	24.2	20.8	23.9
Student	#	#	22.9	24.3
looking after family/home	5,100	25.7	26.3	25.1
temporary sick	!	!	2.1	1.9
long-term sick	3,800	19.2	18.9	22.4
discouraged	!	!	1.1	0.8
retired	5,600	28.3	19.2	16.9
other	#	#	9.5	8.5
wants a job	4,100	20.5	27.2	23.9
does not want a job	15,900	79.5	72.8	76.1

Source: ONS annual population survey

Sample size too small for reliable estimate

! Estimate is not available since sample size is disclosive

Notes: numbers are for those aged 16-64

% is a proportion of those economically inactive, except total, which is a proportion of those aged 16-64

Employment by occupation (Oct 2010-Sep 2011)

	Wealden (numbers)	Wealden (%)	South East (%)	Great Britain (%)
Soc 2010 major group 1-3	29,300	46.2	48.1	43.3
1 Managers, directors and senior officials	9,100	14.3	11.4	9.9
2 Professional occupations	10,600	16.7	21.2	19.4
3 Associate professional & technical	9,600	15.1	15.3	13.9
Soc 2010 major group 4-5	15,800	24.9	21.5	21.9
4 Administrative & secretarial	5,300	8.4	11.7	11.1
5 Skilled trades occupations	10,500	16.6	9.7	10.7
Soc 2010 major group 6-7	10,900	17.2	16.4	17.2
6 Caring, leisure and Other Service occupations	6,200	9.7	9.2	9.1
7 Sales and customer service occs	4,700	7.4	7.1	8.1
Soc 2010 major group 8-9	7,400	11.7	14.0	17.6
8 Process plant & machine operatives	#	#	4.7	6.5
9 Elementary occupations	5,500	8.7	9.3	11.0

Source: ONS annual population survey
Sample size too small for reliable estimate
Notes: Numbers and % are for those of 16+
% is a proportion of all persons in employment

Qualifications (Jan 2010-Dec 2010)

	Wealden (numbers)	Wealden (%)	South East (%)	Great Britain (%)
NVQ4 and above	24,600	29.7	33.9	31.3
NVQ3 and above	41,100	49.6	53.8	51.0
NVQ2 and above	57,000	68.9	70.8	67.3
NVQ1 and above	67,300	81.3	84.1	80.2
Other qualifications	5,800	7.0	7.5	8.5
No qualifications	9,700	11.7	8.5	11.3

Source: ONS annual population survey
Notes: For an explanation of the qualification levels see the definitions section.
Numbers and % are for those of aged 16-64
% is a proportion of resident population of area aged 16-64

Earnings by residence (2011)

	Wealden (pounds)	South East (pounds)	Great Britain (pounds)
Gross weekly pay			
Full-time workers	570.0	554.4	503.1
Male full-time workers	637.4	607.4	541.7
Female full-time workers	494.7	474.3	446.3
Hourly pay			
Full-time workers	14.72	14.13	12.77
Male full-time workers	15.90	15.26	13.32
Female full-time workers	12.95	12.66	11.95

Source: ONS annual survey of hours and earnings - resident analysis
Note: Median earnings in pounds for employees living in the area.

OUT-OF-WORK BENEFITS

The Jobseeker's Allowance (JSA) is payable to people under pensionable age who are available for, and actively seeking, work of at least 40 hours a week.

Total JSA claimants (April 2012)

	Wealden (numbers)	Wealden (%)	South East (%)	Great Britain (%)
All people	1,348	1.6	2.6	4.0
Males	906	2.2	3.5	5.3
Females	442	1.0	1.7	2.6

Source: ONS claimant count with rates and proportions

Note: % is a proportion of resident population of area aged 16-64 and gender

JSA claimants by age duration (April 2012)

	Wealden (level)	Wealden (%)	South East (%)	Great Britain (%)
Aged 16 to 64				
Total	1,340	1.6	2.6	4.0
Up to 6 months	845	1.0	1.5	2.1
Over 6 and up to 12 months	265	0.3	0.5	0.9
over 12 months	235	0.3	0.5	0.9
Aged 18 to 24				
Total	380	4.7	5.2	7.8
Up to 6 months	285	3.5	3.4	4.8
Over 6 and up to 12 months	65	0.8	1.2	2.0
over 12 months	30	0.4	0.6	1.0
Aged 25 to 49				
Total	660	1.6	2.7	4.1
Up to 6 months	390	1.0	1.5	2.1
Over 6 and up to 12 months	145	0.4	0.6	0.9
over 12 months	125	0.3	0.6	1.1
Aged 50 to 64				
Total	290	0.9	1.6	2.2
Up to 6 months	160	0.5	0.9	1.1
Over 6 and up to 12 months	50	0.2	0.3	0.4
over 12 months	80	0.2	0.5	0.7

Source: ONS claimant count - age duration with proportions

Note: % is number of persons claiming JSA as a proportion of resident population of the same age

Working-age client group - key benefit claimants (November 2011)

	Wealden (numbers)	Wealden (%)	South East (%)	Great Britain (%)
Total claimants	7,230	8.6	10.6	14.7
By statistical group				

Job seekers	1,240	1.5	2.5	3.8
ESA and incapacity benefits	3,500	4.2	4.6	6.5
Lone parents	610	0.7	1.2	1.5
Carers	690	0.8	0.9	1.2
Others on income related benefits	250	0.3	0.3	0.4
Disabled	740	0.9	0.9	1.1
Bereaved	200	0.2	0.2	0.2
Key out-of-work benefits†	5,600	6.7	8.6	12.2

Source: DWP benefit claimants - working age client group

† Key out-of-work benefits includes the groups: job seekers, ESA and incapacity benefits, lone parents and others on income related benefits. See the Definitions and Explanations below for details

Note: % is a proportion of resident population of area aged 16-64

LABOUR DEMAND

Jobs density (2010)

	Wealden (jobs)	Wealden (density)	South East (density)	Great Britain (density)
Jobs density	59,000	0.70	0.80	0.77

Source: ONS jobs density
Notes: The density figures represent the ratio of total jobs to population aged 16-64.
Total jobs includes employees, self-employed, government-supported trainees and HM Forces

Employee jobs (2008)

	Wealden (employee jobs)	Wealden (%)	South East (%)	Great Britain (%)
Total employee jobs	45,200	-	-	-
Full-time	30,200	66.7	69.0	68.8
Part-time	15,000	33.3	31.0	31.2
Employee jobs by industry				
Manufacturing	4,200	9.4	8.1	10.2
Construction	4,300	9.5	4.5	4.8
Services	35,200	77.9	85.7	83.5
Distribution, hotels & restaurants	12,200	27.1	24.6	23.4
Transport & communications	1,300	2.8	5.9	5.8
Finance, IT, other business activities	7,400	16.4	24.0	22.0
Public admin, education & health	10,800	23.8	25.6	27.0
Other services	3,600	7.9	5.6	5.3
Tourism-related†	4,700	10.4	8.2	8.2

Source: ONS annual business inquiry employee analysis
- Data unavailable
† Tourism consists of industries that are also part of the services industry (see the definitions section)
Notes: % is a proportion of total employee jobs
Employee jobs excludes self-employed, government-supported trainees and HM Forces

Earnings by workplace (2011)

	Wealden (pounds)	South East (pounds)	Great Britain (pounds)
Gross weekly pay			
Full-time workers	440.1	528.1	502.6
Male full-time workers	456.9	578.5	540.9
Female full-time workers	366.3	454.0	445.7
Hourly pay			
Full-time workers	10.57	13.41	12.75
Male full-time workers	10.53	14.34	13.30
Female full-time workers	10.51	12.08	11.94

Source: ONS annual survey of hours and earnings - workplace analysis
Note: Median earnings in pounds for employees working in the area.

Jobcentre plus vacancies (April 2012)

	Wealden	South East	Great Britain
Unfilled jobcentre vacancies (numbers)	269	42,720	305,814
Unfilled jobcentre vacancies per 10,000 population aged 16-64	32	78	78
JSA claimants per unfilled jobcentre vacancy	5.0	3.4	5.1

Source: Jobcentre Plus vacancies - summary analysis

BUSINESSES

VAT registered businesses (2007)

	Wealden (numbers)	Wealden (%)	South East (%)	Great Britain (%)
Registrations	570	7.8	10.0	10.2
Deregistrations	465	6.4	7.2	7.3
Stock (at end of year)	7,280	-	-	-

Source: BERR - vat registrations/deregistrations by industry
Note: % is a proportion of stock (at end of year)

Definitions and Explanations

RESIDENT POPULATION

The estimated population of an area includes all those usually resident in the area, whatever their nationality. HM Forces stationed outside the United Kingdom are excluded but foreign forces stationed here are included. Students are taken to be resident at their term-time address.

LABOUR SUPPLY

Labour supply consists of people who are employed, as well as those people defined as unemployed or economically inactive, who can be considered to be potential labour supply. Information in this section relates to the characteristics of people living in an area.

Most labour supply data comes from the Annual Population Survey (APS). The APS is the largest regular household survey in the United Kingdom. It includes data from the Labour Force Survey (LFS), plus further sample boosts in England, Wales and Scotland. The survey includes data from a sample of around 256,000 people aged 16 and over.

As APS estimates are based on samples, they are subject to sampling variability. This means that if another sample for the same period were drawn, a different estimate might be produced. In general, the larger the number of people in a sample, the smaller the variation between estimates. Estimates for smaller areas such as local authorities are therefore less reliable than those for larger areas such as regions. When the sample size is too small to produce reliable estimates, the estimates are replaced with a #.

Economically Active

Economically active: People who are either in employment or unemployed.

Economic activity rate: People, who are economically active, expressed as a percentage of all people.

In employment: People who did some paid work in the reference week (whether as an employee or self employed); those who had a job that they were temporarily away from (eg, on holiday); those on government-supported training and employment programmes; and those doing unpaid family work.

Employment rate: The number of people in employment expressed as a percentage of all people aged 16-64.

Employees and self employed: The division between employees and self employed is based on survey respondents' own assessment of their employment status. The percentage show the number in each category as a percentage of all people aged 16-64. The sum of employees and self employed will not equal the in employment figure due to the inclusion of those on government-supported training and employment programmes, and those doing unpaid family work in the latter.

Unemployed: Refers to people without a job who were available to start work in the two weeks following their interview and who had either looked for work in the four weeks prior to interview or were waiting to start a job they had already obtained.

Model-based unemployed: As unemployed form a small percentage of the population, the APS unemployed estimates within local authorities are based on very small samples so for many areas would be unreliable. To overcome this ONS has developed a statistical model that provides better estimates of total unemployed for unitary authorities and local authority districts (unemployment estimates for counties are direct survey estimates). Model-based estimates are not produced for male or female unemployed.

The model-based estimate improves on the APS estimate by *borrowing strength* from the claimant count to produce an estimate that is more precise (i.e. has a smaller confidence interval). The claimant count is not itself a measure of unemployment but is strongly correlated with unemployment, and, as it is an administrative count, is known without sampling error. The gain in precision is greatest for areas with smaller sample sizes.

Unemployment rate: Unemployed as a percentage of the economically active population.

Economically Inactive

Economically inactive: People who are neither in employment nor unemployed. This group includes, for example, all those who were looking after a home or retired.

Wanting a job: People not in employment who want a job but are not classed as unemployed because they have either not sought work in the last four weeks or are not available to start work.

Not wanting a job: People who are neither in employment nor unemployed and who do not want a job.

Occupation

Occupations are classified according to the Standard Occupation Classification 2000. Descriptions of the job

titles included in each code are available in the SOC manuals which can be downloaded from: http://www.ons.gov.uk/ons/guide-method/classifications/archived-standard-classifications/standard-occupational-classification-2000/dissemination-media-and-availability/index.html

Qualifications

Qualifications data are only be available from the APS for calendar year periods, for example, Jan to Dec 2005. The variables show the total number of people who are qualified at a particular level and above, so data in this table are not additive. Separate figures for each NVQ level are available in the full Annual Population Survey data set (wizard/advanced query).

The trade apprenticeships are split 50/50 between NVQ level 2 and 3. This follows ONS policy for presenting qualifications data in publications. Separate counts for trade apprenticeships can be obtained from the full APS data set (wizard/advanced query).

No qualifications: No formal qualifications held

Other qualifications: includes foreign qualifications and some professional qualifications

NVQ 1 equivalent: e.g. fewer than 5 GCSEs at grades A-C, foundation GNVQ, NVQ 1, intermediate 1 national qualification (Scotland) or equivalent

NVQ 2 equivalent: e.g. 5 or more GCSEs at grades A-C, intermediate GNVQ, NVQ 2, intermediate 2 national qualification (Scotland) or equivalent

NVQ 3 equivalent: e.g. 2 or more A levels, advanced GNVQ, NVQ 3, 2 or more higher or advanced higher national qualifications (Scotland) or equivalent

NVQ 4 equivalent and above: e.g. HND, Degree and Higher Degree level qualifications or equivalent

Earnings by Residence

The figures show the median earnings in pounds for employees living in the area who are on adults rates of pay and whose pay was not affected by absence. Figures for earnings come from the Annual Survey of Hours and Earnings (ASHE). The ASHE is based on a 1 per cent sample of employees, information on whose earnings and hours is obtained from employers. The survey does not cover self-employed. Information relates to a pay period in April.

The earnings information collected relates to gross pay before tax, national insurance or other deductions, and excludes payments in kind. It is restricted to earnings relating to the survey pay period and so excludes payments of arrears from another period made during the survey period; any payments due as a result of a pay settlement but not yet paid at the time of the survey will also be excluded.

OUT-OF-WORK BENEFITS

JSA Claimant Count

JSA claimant count records the number of people claiming Jobseekers Allowance (JSA) and National Insurance credits at Jobcentre Plus local offices. People claiming JSA must declare that they are out of work, capable of, available for and actively seeking work during the week in which the claim is made.

The percentage figures express the number of claimants resident in an area as a percentage of the population aged 16-64 resident in that area.

The count of total JSA claimants is mostly derived from the Jobcentre Plus computer records. For various reasons, e.g. a claimant's National Insurance number is not known, a few claims have to be dealt with manually. These clerical claims, which amount to less than 1 per cent of the total, are counted separately and not analysed in as much detail as the computerised claims. The count of total JSA claimants includes clerical claims, but only the computerised claims are analysed by age and duration.

DWP Working-Age Client Group

The number of working-age people who are claiming one or more key DWP benefits. The key benefits are: bereavement benefit, carer's allowance, disability living allowance, ESA and incapacity benefit, severe disablement allowance, income support, jobseeker's allowance, and widow's benefit. The age at which women reach State Pension age is gradually increasing from 60 to 65 between April 2010 and April 2020. Throughout this period, only women below State Pension age are counted as working age benefit claimants."

The total count is broken down by statistical groups. These categorise each person according to the main reason why they are claiming benefit. Each client is classified to a single group.

Benefits are arranged hierarchically and claimants are assigned to a group according to the top most benefit they receive. Thus a person who is a lone parent and receives Incapacity Benefit would be classified as incapacity benefits. Consequently, the group lone parent will not contain all lone parents as some will be included in the incapacity benefits group and Job seekers groups.

Key out-of-work benefits consists of the groups: job seekers, ESA and incapacity benefits, lone parents and others on income related benefits.

These groups have been chosen to best represent a count of all those benefit recipients who cannot be in

full-time employment as part of their condition of entitlement. Those claiming solely Bereavement Benefits or Disability Living Allowance (DLA) are not included as these are not out-of-work or income based benefits. DLA is paid to those needing help with personal care. These people can, and some will, be in full-time employment. If DLA claimants are also in receipt of JSA, IS, ESA or Incapacity Benefits in addition to DLA they will be counted under the relevant statistical group. In addition, we exclude those claiming solely carer's benefits or claiming carer's benefits alongside income support, as DWP does not pursue active labour market policies for this group. Carers benefits are paid to those with full time caring responsibilities. The group entitled to Carer's benefits alongside Income Support (IS) includes around 86,000 claimants and has been stable over time.

This Nomis series is different to that published in the Office for National Statistics (ONS) Labour Market Statistics Bulletin (table 25) and on the DWP website at http://83.244.183.180/100pc/wa/tabtool_wa.html (against the link entitled "One-Click" Key Out-of-Work Benefits). This Nomis series uses DWP Jobseeker's Allowance numbers, whilst the other two series use the ONS claimant count for Jobseeker's Allowance. Details of the difference between these series can be found at http://research.dwp.gov.uk/asd/asd1/tabtools/differences.pdf

LABOUR DEMAND

Labour demand includes jobs and vacancies available within the area.

Jobs Density

The numbers of jobs per resident aged 16-64. For example, a job density of 1.0 would mean that there is one job for every resident aged 16-64.

The total number of jobs is a workplace-based measure and comprises employee jobs, self-employed, government-supported trainees and HM Forces. The number of residents aged 16-64 figures used to calculate jobs densities are based on the relevant mid-year population estimates.

Employee Jobs

The number of jobs held by employees. Employee jobs excludes self-employed, government-supported trainees and HM Forces, so this count will be smaller than the total jobs figure shown in the Jobs density table. The information comes from the Annual Business Inquiry (ABI) - an employer survey conducted in December of each year. The survey samples around 78,000 businesses. The ABI records a job at the location of an employee's workplace (rather than at the location of the business's main office).

Full-time and part-time: In the ABI, part-time employees are those working for 30 or fewer hours per week.

Tourism-related includes the following sectors:

551 Hotels
552 Camping sites etc
553 Restaurants
554 Bars
633 Activities of travel agencies etc
925 Library, archives, museums etc
926 Sporting activities
927 Other recreational activities

Earnings by Workplace

The figures show the median earnings in pounds for employees working in the area who are on adults rates of pay and whose pay was not affected by absence. Figures for earnings come from the Annual Survey of Hours and Earnings (ASHE). The ASHE is based on a 1 per cent sample of employees, information on whose earnings and hours is obtained from employers. The survey does not cover self-employed. In 2004 information related to the pay period which included 21 April.

The earnings information collected relates to gross pay before tax, national insurance or other deductions, and excludes payments in kind. It is restricted to earnings relating to the survey pay period and so excludes payments of arrears from another period made during the survey period; any payments due as a result of a pay settlement but not yet paid at the time of the survey will also be excluded.

Jobcentre plus vacancies

The figures in the tables are based on the number of live unfilled vacancies handled by Jobcentre Plus. These are vacancies actively available to jobseekers on the count date and are derived as a by-product of administrative systems. Users should be aware of the following points when using and interpreting the series:

- Coverage relates just to vacancies notified to Jobcentre Plus and as such represent a market share of vacancies throughout the whole economy. This proportion varies over time, according to the occupation of the vacancy and industry of the employer, and by local area.
- The time-series is susceptible to discontinuities arising from changes to vacancy taking and vacancy handling (e.g. 2006 changes to employer follow-up processes).
- Local area data can throw up spurious figures. For example, Lincoln local authority includes all national vacancies notified by the Ministry of Defence since these are recorded against a single central postcode irrespective of actual location.

For further details see: https://www.nomisweb.co.uk/articles/406.aspx

BUSINESSES

VAT Registered Businesses

VAT registrations and de-registrations are the best official guide to the pattern of business start-ups and closures. They are an indicator of the level of entrepreneurship and of the health of the business population. As such they are used widely in regional and local economic planning.

These figures do not, however, give the complete picture of start-up and closure activity in the economy. Some VAT exempt sectors and businesses operating below the threshold for VAT registration are not covered. At the start of 2005, the VAT threshold was an annual turnover of £58,000, and 1.8 million of the estimated 4.3 million enterprises in the UK were VAT-registered.

However, some businesses do voluntarily register for VAT even though their turnover is below the threshold. Data for 2005 shows that around a fifth of all registrations have turnover below the VAT threshold.

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Source: Office for National Statistics

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APPENDIX 4

2011 EXPERIAN RETAIL PLANNER DATA

Retail Expenditure Report - Wealden

2010 Total Expenditure per HH (in 2010 prices) Comparison

Total Comparison per HH	7,983
10% of Non-Durable household goods per HH	21
Appliances for personal care per HH	763
Audio-visual, photographic and information processing equipment per HH	718
Bicycles per HH	54
Books and stationery per HH	376
Clothing materials and garments per HH	1,458
Furniture and furnishings; carpets and other floor coverings per HH	713
Games, toys and hobbies; sport and camping; musical instruments per HH	885
Gardens, plants and flowers per HH	212
Glassware, tableware and household utensils per HH	208
Household textiles per HH	288
Jewellery, clocks and watches per HH	291
Major household appliances (electric or not) per HH	220
Major tools and equipment per HH	24
Materials for maintenance and repair of the dwelling per HH	357
Medical goods and other pharmaceutical products per HH	224
Other personal effects per HH	139
Pets and related products per HH	206
Recording media per HH	246
Shoes and other footwear per HH	220
Small electrical household appliances per HH	36
Small tools and miscellaneous accessories per HH	183
Therapeutic appliances and equipment per HH	140

2010 Total Expenditure per HH (in 2010 prices) Convenience

Total Convenience per HH	5,003
90% of Non-Durable household goods per HH	189
Alcohol (off-trade) per HH	674
Food and non-alcoholic beverages per HH	3,619
Newspapers and periodicals per HH	184
Tobacco per HH	337

Leisure per Household

Total Leisure per Household	4,847
Accommodation services per Household	399
Cultural services per Household	686
Games of chance per Household	610
Hairdressing salons and personal grooming establishments per Household	287
Recreational and sporting services per Household	246
Restaurants, cafes etc per Household	2,620

2011 Experian Ltd
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APPENDIX 5

NEW HOMES BONUS CALCULATOR FOR WEALDON

New Homes Bonus Calculator

Wealden

Current housing stock (Oct 10):	64,226
Net change in stock (Oct 10)[1]:	424
Affordable housing supply (09/10):	90
Stock of empty homes (Oct 10):	465
Affordability ratio (2010)[2]:	10.94

Return to homepage

Band	A	B	C	D	E	F	G	H	Total
Dwelling stock: (Oct 10)	6%	11%	24%	20%	16%	11%	10%	1%	64,226
Council tax: average national band (2010/11)	£959.48	£1,119.39	£1,279.31	£1,439.22	£1,759.05	£2,078.87	£2,398.70	£2,878.44	
Total net additions, including affordable homes[3]:	160								
	10	18	39	32	25	18	16	2	160
Gross affordable housing units[4] (£350 per year premium):	56								56
Empty homes brought back into use[5]:	0	0	0	0	0	0	0	0	0
Traveller pitches[6]:	0								0

Payment for one year:

Lower tier	Upper tier
£216,615	£54,154

Total payment over 6 years:

Lower tier	Upper tier
£1,299,689	£324,922

Assumptions:

1. Net additional dwellings are calculated by subtracting effective stock (total stock less long-term empty homes) as recorded on the CTB in one year from the previous year. This illustration includes the change in long-term empty homes (also separated out for illustration). Please see page 21 of the consultation document for further details. (http://www.communities.gov.uk/publications/housing/newhomesbonusconsult)

2. Affordability is measured by the ratio of lower quartile house price to lower quartile earnings (2010).

3. In this illustration net additions by band are assumed to be delivered in-line with the distribution of existing stock (Oct 10); not based on 09-10 band delivery.

4. Affordable units comprise of social rent, intermediate rent and low cost home ownership and include both new build and acquisitions as measured by DCLG statistics (http://www.communities.gov.uk/documents/housing/xls/1406068.xls). This premium will be paid from year 2 onwards, rewarding affordable units delivered from April 2010 onwards).

5. If there is an increase in the number of long term empty homes, please enter this as a negative figure.

6. Payments for traveller pitches are based on national average band A plus an additional £350 per pitch per annum. This is for pitches on traveller sites owned and managed by local authorities or Registered Social Landlords.

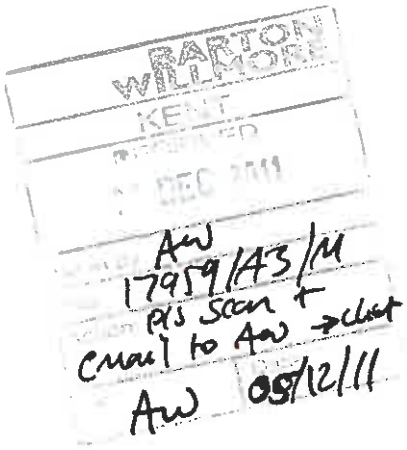
APPENDIX 3:

EIA Screening Decision

OUR REF: CM/WD/2011/6509/SO
ASK FOR: **Ms C McIntyre Tel: 01892 602541**
DATE: 30 November 2011
YOUR REF:

SCANNED

Wealden
District Council



Barton Willmore LLP
The Observatory
Southfleet Road
Ebbsfleet
Dartford
Kent
DA10 0DF

Kelvin Williams
Head of Planning and Building Control

Dear Mr Wilford

Re: WD/2011/6509/SO
REQUEST FOR SCREENING OPINION FOR PROPOSED RESIDENTIAL DEVELOPMENT (CLASS C3), ASSOCIATED ACCESS, OPEN SPACE AND LANDSCAPING
LAND TO THE REAR OF THE POLICE STATION, HIGH STREET, HEATHFIELD

Thank you for your letter received on the 07 October 2011, seeking a formal Screening Opinion from the Council in accordance with Regulation 5(1) of the Town and Country Planning (Environmental Impact Assessment) Regulations 2011 for the above site. I apologise for the delay in confirming to you in writing, my earlier verbal confirmation that an EIA would be required to accompany any application for this site.

The Screening Opinion has been undertaken in accordance with the Town and Country Planning (Environmental Impact Assessment) (England and Wales) Regulations 2011 and the Department of the Environment, Transport and Regions (DETR) Circular 2/99 "Environmental Impact Assessment"

It is the Council's opinion that the development falls under Schedule 2 development within the meaning of the Town and Country Planning (Environmental Impact Assessment) (England and Wales) Regulations 2011 under Category 10(b) being an urban development project whereby the area of the development exceeds 0.5 hectares.

The Council is of the opinion that the size and nature of the development, which would entail up to 160 dwellings on a 4.94 hectare site, has the potential to give rise to significant environmental effects, having regard to:

- The location of the proposed development within the High Weald Area of Outstanding Natural Beauty;
- the significant urbanising effect on this largely greenfield site and its impact on the landscape setting of Heathfield and the AONB;

- the proximity of the site to the designated Ancient Woodland and ghyll, and the need to demonstrate that there would be no adverse impact on the hydrological regime and ecological value of the ghyll and Ancient Woodland;

- the potential for the presence of protected species on the site and the immediate environs,

- the potential impact on the existing infrastructure and its ability to accommodate this development.

Accordingly the Council confirms that an Environmental Impact Assessment would be required for this site and that any planning application must be accompanied by an Environmental Statement. The Council would also expect any application for this development to be accompanied by Stage 1 Road Safety Audit of the proposed access and a Lighting Impact Assessment of the proposed development.

Yours sincerely

Team Leader Major Applications



Selection Criteria for Screening Schedule 2 Development

WDC Reference: WD/2011/6509/SO ***Parish: Heathfield***
Date received: 07 October 2011 *Grid Reference: 557656 121489*

Screening Opinion for:
PROPOSED RESIDENTIAL DEVELOPMENT (CLASS C3), ASSOCIATED ACCESS, OPEN SPACE AND LANDSCAPING
At
LAND TO THE REAR OF THE POLICY STATION, HIGH STREET, HEATHFIELD

The following are the selection criteria for Screening Schedule 2 developments as set out in Schedule 3 of the 2011 regulations

Description of Development		**Yes**	**No**
Is it a Schedule 1 case?			✓
Is it a Schedule 2 case?		✓	
Further details or comments	The proposal qualifies as a Class 10(b) urban development area which exceeds 0.5 hectares.		

1 CHARACTERISTICS OF DEVELOPMENT

(i) Size of Development		**Yes**	**No**
Does the proposal exceed sizes suggested in Circular 2/99?			✓
Is the proposal significantly in excess of sizes as set out in C2/99?			✓
Further details or comments	Residential development comprising approximately160 units associated open space and landscaping		

(ii) Cumulation with Other Development		**Yes**	**No**
Will the proposal be undertaken in conjunction with other development?			✓
Details	The development would constitute a proposed expansion of the existing Heathfield settlement. The site falls within the area indicated under the submitted Core Strategy Policy WSC4 Strategic development Areas SD11 - Land at North West Heathfield. The hearings into the Wealden District (Incorporating Part of the South Downs National Park) Core Strategy (CS) will open on 17 January 2012		
Will there be any cumulative impact?		✓	
Details	Impact on local infrastructure including wastewater treatment works and highways		

(iii) Use of Natural Resources	**Yes**	**No**
Will any natural resources be lost?	✓	

Details	The construction of the proposed development will utilise existing land which is predominantly greenfield open land and includes the residential properties and curtilages of Reynards, Woodhatch, Holmhurst and Lavender Cottage.		
Will their loss be significant?		✓	
Why?	The development will change the character of the site which is largely undeveloped with the exception of the frontage ribbon development of the existing residential properties. The proposed development would have a significant urbanising effect on the land and the landscape setting of Heathfield. The surrounding environs has the potential for rare and protected species and the loss of these could result from impacts during both construction and usage of completed development as follows: • At construction stage – damage to habitat not required for land-take from various aspects of construction activities, including dust, vehicle movement storage of materials and incursion of site workers into sensitive areas • Usage following completion of development - Isolation of potential wildlife habitats, general presence of people & pets and vehicles leading to disturbance to plant/animal communities and possible long term loss. • Potential impact on Ancient Woodland and the ghyll		

(iv) **Production of Waste**		**Yes**	**No**
Will the proposal generate waste?		✓	
Details	Construction will inevitably require excavation of sloping fields and transport and disposal or reuse of a large quantity of spoil		
Will this be significant in terms of impact on the site?		✓	
Details	Visual and landscape impact and impact on hydrological regime of the ancient woodland and the ghyll		
Will this be significant in terms of off-site impacts?		✓	
Details	Transport impact on local highways and surrounding villages		

(v) **Pollution and Nuisances**		**Yes**	**No**
Will the proposal cause any pollution/nuisance?		✓	
Will it be short term (during construction)?		✓	
Will it be medium term (first 12 months of use)?		✓	
Will it be longer term?		✓	
Are the impacts significant?		✓	
Details	The construction period will give rise to pollution and nuisance from: • demolition, site clearance, excavation and earth working, movement of trucks and mixing and batching operations giving rise to dust emissions; and • potential air pollution from the exhausts of construction related traffic • noise pollution from plant and working methods A combination of good environmental management, together with effective use of mitigation measures should ensure that impacts from construction activity will be within acceptable limits		

(vi) Risk of Accidents	Yes	No
A higher than average risk of accident during construction?		✓
A higher than average risk of accident during operation?		✓

2 LOCATION OF DEVELOPMENT

(i) Environmental Sensitivity		Yes	No
Does the site have an existing land use?		✓	
Details	Existing site comprises part existing residential curtilage and part open grassland/fields		
Is there an abundance of natural resources in the area?		✓	
Are they of high quality?		✓	
Details	The majority of the site is located within the AONB which constitutes a "sensitive area" as defined in Regulation 2(1) Ancient woodland also lies on east and north-east boundaries and the ghyll beyond		
Do they have regenerative qualities?			✓
Can the natural environment absorb the proposal?			✓
Details	The proposals will significantly urbanise this part of Heathfield and change the landscape setting of Heathfield. The development is permanent and irreversible and therefore the impact on the natural environment cannot be absorbed by virtue of the loss of a significant tract of open land. The site itself has no statutory nature conservation designation however the site is adjacent to the ghyll and ancient woodland and therefore there is potential for rare and protected species. Impact on hydrological regime Light pollution is also a potential issue		

3 CHARACTERISTICS OF POTENTIAL IMPACTS

(i) Extent of the Impacts		Yes	No
Will the impacts extend beyond the site?		✓	
Details	The proposed development is likely to increased vehicular movements on the local highway network The proposed site also slopes down towards the ghyll, offering long distance views across the area and the High Weald AONB.		
How far beyond?	Surrounding local highway network and the AONB		

(ii) Transfrontier Impacts		Yes	No
Are there any impacts beyond the national boundary?			✓
What are they?	Not applicable		

(iii) Magnitude and Complexity of the Impacts	Yes	No
Are the impacts of greater scale or complexity than other applications?		✓

Details	No unusual impacts for a development of this nature, size and location. However given the sensitive nature of the site there is the potential for these impacts to be significant.

(iv) Probability of Impacts	Yes	No
Are the impacts very likely to occur (100%)?	✓	
Is there less chance of them occurring (50%)		✓
Is there limited chance of them occurring (25%)		✓
Which impacts, if any are very likely to occur?	Traffic, landscape/visual and ecological impact.	

(vi) Duration, Frequency and Reversibility of the Impacts	Yes	No
Will the impacts last beyond the construction phase?	✓	
Will the impacts be frequent?	✓	
Are any impacts reversible?		✓
Which ones?	The proposal is for the construction of a residential development on a greenfield site which will be a permanent and non-reversible impact	

Conclusions	Yes	No
Is an Environmental Statement required?	✓	

Further comments	A full EIA is considered a requirement in view of the scale of the development and the potential impacts in this sensitive location within the High Weald AONB. Application will also need to include Stage 1 Safety Audit and Lighting Assessment

Authorised by: C McIntyre

Signature

Date: 29th November 2011

APPENDIX 4:

Interim Landscape Technical Summary

(Sept 2011)

LAND TO THE REAR OF POLICE STATION, HIGH STREET, HEATHFIELD SUMMERTREE ESTATES

INTERIM LANDSCAPE TECHNICAL SUMMARY (SEPTEMBER 2011)

1.0 Landscape and Visual Appraisal

1.1 Barton Willmore Landscape Planning and Design (BWLP&D) undertook a Landscape Visual Appraisal (LVA) of the Site in August 2011. The LVA assessed the Site in the context of the wider landscape to understand the Site's ability to accommodate change in the setting of the AONB. Furthermore, the LVA also assessed 11No. other SHLAA sites in Heathfield (located in north east and west Heathfield) to evaluate the impact of those potential SHLAA locations on the AONB. The report concluded that North West Heathfield was the most suitable location to accommodate future development in Heathfield and, as such, supported the proposals of SD11 of the submitted Core Strategy.

1.2 The LVA was prepared in accordance with the Guidelines for Landscape and Visual Impact Assessment (GLVIA) (Spon Press. 2nd ed. 2002) and Topic Paper 6: Techniques and Criteria for Judging Capacity and Sensitivity (Scottish Natural Heritage and the Countryside Agency, 2004). The assessment adopts a clear and transparent process forming the basis from which professional judgements have been made.

1.3 The LVA has taken into consideration the following policies:

National

- *Planning Policy Statement 1: Delivering Sustainable Development*
- *Planning Policy Statement 3: Housing*
- *Planning Policy Statement 7: Sustainable Development in Rural Areas*
- *Draft National Planning Policy Framework*
- *Joint Character Area 122: High Weald*

Regional

- *The High Weald Area of Outstanding Natural Beauty Management Plan (2nd Ed.)*
- *The South East Plan*
- *Urban Character Area 38: Heathfield*

- *High Weald Character Area 6: Upper Rother Valley*
- *High Weald Character Area 5: South Slopes of the High Weald*

Local

- *Wealden District Local Plan - 'saved policies'*
- *Non-Statutory Wealden Local Plan*
- *Wealden District (Incorporating Part of the South Downs National Park) Local Development Framework Core Strategy Submission Document*
- *Wealden Design Guide (November 2008)*
- *High Weald Character Area 8: Dudwell Valley*

1.4 The Site Appraisal exercise identified that the Site is influenced by existing elevated residential development along the southern boundary, with adjoining open fields enclosed within a blanket of established woodland and reflects the broader woodland character to the north-west of Heathfield. Existing landscape features within the Site include ornamental curtilage planting with mature trees surrounding existing residential properties to the south.

1.5 Overall the landscape character sensitivity of the Site has been assessed as "low-medium" owing to its contained location within an established enclosure of woodland in close proximity to urban influences along High Street and within the town centre. Landscape value has been assessed as "medium" on account of its extension into the High Weald AONB from an existing settlement pattern associated with properties along High Street. The Site's containment within established woodland and the ability to strengthen links between residential areas and adjoining areas of woodland also increases the potential landscape capacity of the Site.

1.6 The High Weald AONB designation collars the entirety of the existing settlement of Heathfield and requires this same level of careful regard to all potential development options considered beyond the existing settlement edge.

1.7 A number of photographs from near, medium and long distance views were undertaken from public accessible viewpoints. A visual appraisal of the Site identifies that potential views are almost entirely limited to near distance private views from adjoining residential properties along the southern boundary with glimpsed views from adjoining sections of High Street. The potential for longer distance views from elevated areas to the north has also been assessed, identifying that the combination of viewing distance and intervening vegetation makes the Site difficult to observe. Overall the visual sensitivity of the Site is assessed as "low-medium".

1.8 A comparative assessment of the Site comparing this against alternative SHLAA sites identifies that the area to the north-west of Heathfield provides the greatest potential to absorb residential development without detrimental impacts on the underlying woodland character or views to and from the wider High Weald AONB. By comparison, land further to the west introduces a stronger woodland context with greater potential effects into adjoining areas. As such, proposed strategic area SD11 is considered the most appropriate location for development within Heathfield.

1.9 In the wider area encompassing Heathfield, the alternate SHLAA sites considered have been assessed as having greater landscape sensitivity and an associated reduction in their landscape capacity in terms of their ability to absorb residential development. Land to the north-east of Heathfield is assessed as extending beyond the existing settlement pattern into a separate visual catchment and onto areas of elevated and exposed ridge tops. The relationship between adjoining listed buildings and Heathfield Park add additional sensitivities to the south of this area. A similar increase in landscape character sensitivity is identified on land to the west of Heathfield to the south of Ghyll Road where the requirement to remove vegetation established in this area would result in a substantial reduction in the containment and rural character established in this area.

1.10 In summary, the Site is considered to represent a "medium" level of landscape sensitivity with "medium-high" capacity to absorb residential development embedded within an established landscape framework. Medium capacity is identified as:

> *The Site is able to accommodate larger amounts of development, providing it has regard to the setting and form of existing settlement and the character and the sensitivity of adjacent landscape character areas. Certain landscape and visual features in the area may require protection.*

1.11 This represents the highest level of landscape capacity (i.e. the most suitable to accommodate development) surrounding Heathfield, when compared to the other SHLAA locations. Such development could retain a mature woodland backdrop and establish a sympathetic transition between adjoining areas of woodland enhancing the contribution of existing woodland to the character of this area. In this context, the Site is considered to be acceptable in landscape and visual terms and addresses relevant landscape policies including the High Weald Management Plan. Given these outcomes, the Site is considered to have the ability to absorb residential development and avoid any material landscape or significant adverse visual effects.