Appendix to Matter Legal Compliance /WDC

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

Core Strategy Hearing

Legal Compliance - Statement by WDC/ SDNPA

Appendix

December 2011

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

Appendix To Legal Compliance

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Sustainable Community Strategy objectives & Core Strategy policies towards them

Appendix A Legal Compliance /WDC

Prepared May 2011 - Core Strat representations period complete, Strat Sites development still ongoing.

CS policies (/ aspirations) reflect SCS objectives
Partial alignment between SCS objectives & CS policies (/ aspirations) or work on aligned policies in progress
Policies do not align or objective is not reflected in CS policies

Policy area	Core Strategy-relevant Objectives	Relevant Core Strategy policies
OVERARCHING 1	Enough decent, affordable homes to meet the needs of everyone who lives in or needs to live in the District	Delivery of Housing background paper explores need levels and recommends appropriate target %ages of affordable housing for developments around the district. 35% baseline target recommended with increase where possible (increased from previous 30% target). Mix will vary between sites depending on viability, need assessment, etc.
	A broad range of opportunities to improve quality of life, health and well-being, including sport, leisure, recreation and the arts	PPG17 assessment explores current sporting and leisure provision in the District (including on a town-by-town basis) and makes recommendations for improvement; these will be addressed at a later stage of the IDP & Core Strategy.
	A prosperous and sustainable local economy that is dynamic, flexible and maintains the environmental qualities of the area	Background papers on economy & sustainability seek to balance the need for economic growth with the preservation of the natural environment. Individual Development Plan Documents include sustainability impact assessments of particular developments and seek to provide employment space where deemed necessary/appropriate.
	Residents and visitors to Wealden are confident of their safety and free from the fear of crime	Active crime prevention is not within the scope of the Core Strategy but 'passive' crime deterrence can often be achieved through building design and the Wealden Design Guide lays out considerations (section 7.13).
	Improved accessibility for all and reduce the impact of traffic on people and places	Sustainability assessments at strategic site level include air quality impact appraisal and recommendations on measures to ensure sustainable transport access & encourage usage of sustainable transport modes. Specific work undertaken at Environment Agency's request to ensure increased traffic due to development in Ashdown Forest catchment area does not adversely impact the Forest environment.
ENVIRONMENT	Recognise and adapt to climate change and its impact on Wealden, including management of CO2 emissions, the demand for water and the provision of adequate water resources, including new resources where there is environmental capacity	Infrastructure Development Plan explores water supply issues and South East Water's Water Resource Management Plan lays out measures to ensure adequate water supply in future. Sustainability and climate change mitigation policies are embedded throughout the Core Strategy and its supplementary documents. Core Strategy s7.31: "Further detailed design requirements will be included as part of the Delivery and Site Allocations DPD, which will seek to mitigate and adapt to the effects of climate change."

ENVIRONMENT 2	Support flood risk assessments and appropriate plans to reduce flood risk and make space for water; and providing of a network of green spaces to buffer the effects of climate change on wildlife	Flood Risk Assessment undertaken as part of the evidence base for the Core Strategy & findings taken into account at site identification stage. Findings are summarised in sections 14.20 - 14.32 of the green infrastructure paper. Green infrastructure & biodiversity background papers seek to address wildlife needs & maintain and extend existing network of green spaces.
	Strive for the provision of adequate environmental infrastructure to be in place before more houses are built	Infrastructure Development Plan states that new development in Crowborough and Uckfield is not to be occupied until Suitable Alternative Natural Green Spaces have been provided to offset increased footfall on Ashdown Forest.
	Encourage sustainable design through the introduction of a Supplementary Planning Document which includes energy efficiency, greater use of renewables and sustainable transport	No specific Supplementary Planning Document as yet but strategic site DPDs will explore local potential for renewable energy, sustainable transport, etc.
	Encourage support for farmers, other landowners and managers who maintain the landscape and contribute to the quality and visual attractiveness of rural environments	Economic objectives include "support[ing] appropriate employment generating rural and farm diversification projects to support the rural economy".
	Support efforts to ensure that proposed new development takes account of the appearance and unique character of the area	Wealden Design Guide provides detailed exploration of Wealden's local character and guidance on how to ensure development takes account of this. Character of place taken into account in Core Strategy's settlement hierarchy work.
	Encourage improved facilities for pedestrians and adequate provision of high quality, accessible open space, to include facilities for children's recreation in safe, central locations with minimal nuisance to neighbours, a safe and comprehensive network of footpaths, bridleways, and rationalised signage and street furniture	Green infrastructure background paper seeks provision of quality accessible open space & Core Strategy policies reflect (e.g. provision of Alternative Green Space in Crowborough and Uckfield). Strategic site DPDs generally seek to retain existing footpaths and bridleways and explore appropriate additional provision and links with other existing networks. Wealden Design Guide includes guidance on the provision and appearance of street furniture and signage (s. 8.6).
	Strengthen policies for dealing with waste and encourage waste reduction and more recycling by providing additional opportunities, and their inclusion as standard in new developments	Potential replacement of Hailsham Household Waste Recycling Site identified in IDP; further work to be undertaken.
HOUSING	Lobby for an increase in the percentage of affordable housing in developments, an extension of the requirement to include smaller schemes, and encourage affordable provision in all settlements	See overarching affordable housing policy - base percentage increased from 30 to 35%, requirement applied to smaller schemes than previously, and provision will be encouraged on all strategic sites
	Encourage initiatives to promote the green agenda, working towards a reduction in carbon emissions, and the 'eco-homes' standards in the provision of both social and private sector housing	Discussions underway at strategic site level regarding possible requirements to reduce the carbon footprint of new development & take advantage of potential renewable energy sites.
	Encourage greater provision of specialist adaptation of accommodation, e.g. for older people and those with special needs, in the social and private housing sectors	IDP explores potential need for expansion of sheltered housing as a result of new development. Specific details yet to be scoped.

HOUSING	Support the Local Development Framework Core Strategy and Wealden Design Guide to set standards and provide a means to strengthen the case for good design which is in keeping with local character. The Guide should address issues around sustainability, quality of life and the flexibility to encourage and allow new patterns of working	The Guide's section 4 encourages development to be in keeping with local character, and addresses sustainability issues and various quality of life issues. Working patterns are dealt with by the Economy & Provision of Jobs background paper and relevant Core Strategy policies on broadband provision to encourage home working, etc. - see under 'prosperity' below.
	Encourage planning authorities to secure benefits from developers to contribute to adequate infrastructure in line with housing development including water, energy, transport and the provision of new jobs and services that provide for the needs of an ageing population	Infrastructure Development Plan identifies infrastructure needs of new developments through consultation with stakeholders and providers. Use of Section 106 agreements already underway to secure funding for infrastructure provision / improvement, and work in progress on Community Infrastructure Levy charging schedule.
	Support and encourage mixed development comprising both houses and employment sites	Mixed developments proposed for several strategic sites including Polegate, Crowborough, Uckfield and Hailsham.
	Influence the Local Development Framework to allow villages to expand in order to provide small scale developments, and allow higher density dwellings (e.g. terraced houses) in rural areas providing the design and layout is appropriate and includes suitable provision for open space and parking	Provision for at least 455 dwellings across Wealden's rural areas. Development boundaries retained or to be provided across several settlements. (Core Strategy 6.43 - 6.49 & Fig 11) Density & design of dwellings yet to be scoped.
PROSPERITY	Support existing and emerging businesses in order to encourage a thriving range of sectors which will provide more employment opportunities as a prerequisite for enhancing quality of life in Wealden	Economy and provision of jobs background paper includes policies on supporting existing businesses & providing 'grow-on' space (5.51), supporting the rural economy and promoting tourism.
	Encourage small, clean, high-skill businesses with minimal transport needs, e.g. the knowledge-based sector	Economy paper makes reference to reducing business-related transport and provides mostly for small/medium enterprises in keeping with existing business character of the district; otherwise no specific policies at this time.
	Encourage a balanced approach between residential use and new or existing business sites, for example, by encouraging a more sympathetic approach to the conversion of redundant farm buildings for alternative business uses	Policy to "suppor[t] rural diversification where appropriate, particularly where needed to support the landscape, and through the conversion of redundant rural buildings" (Core Strat 3.22)
	Support efforts to ensure that adequate employment opportunities are in place or under development where more houses are to be built	See 'mixed developments' under Housing above. Economic development background paper assesses the likely increase in labour supply from new development (5.56 - 59) and the land provision necessary to accommodate sufficient employment opportunities (5.60 -68).
	Ensure that appropriate support and infrastructure is available for the small and micro businesses which tend to predominate in the area	Proposed employment space takes into account this predominance and seeks to provide both start-up and move-on space for small & medium enterprises. Core Strategy seeks to "ensur[e] provision for a range of sizes, types and locations of premises to meet a range of business needs, including start up, move on, and expansion accommodation" (Core Strat 3.22)

PROSPERITY	Encourage partners to ensure the five core towns are attractive as local retail and service centres	Core Strategy settlement hierarchy identifies service centres of varying degrees and includes policies to retain and enhance these designations. Economic background paper similarly identifies the five core towns and their economic characters, and their aspirations as laid out in town masterplans. Strategic site DPDs will take these into account when proposing housing & employment growth.
	Improve links between business and the local community for example, by encouraging local businesses to employ local people, encouraging and supporting flexible working patterns and measures to include people with disabilities	Working patterns are dealt with by the Economy & Provision of Jobs background paper and relevant Core Strategy policies on broadband provision to encourage home working, etc.
	Develop use of broadband, particularly for electronic communication and websites, and encourage more active networking amongst local businesses	Broadband infrastructure is largely beyond the scope of the IDP but it notes efforts (e.g. RGF fund bids, SEEDA-supported projects) to improve broadband access & supports these efforts. See Core Strategy Appendix D.
COMMUNITY SAFETY	Influence the Local Development Framework to ensure that the design of housing and communal facilities enhances community cohesion and the feeling of well-being	Wealden Design Guide developed at behest of the LSP and LDF in general compiled in consultation with LSP (among others).
TRANSPORT AND ACCESS 4	Encourage early consideration of traffic flow and parking issues when new facilities are being planned	Transport modelling undertaken when planning development, particularly in south of district (South Wealden & Eastbourne Transport Study) & in Uckfield
	Lobby for and encourage more integrated public transport to allow interchange wherever possible between rail, bus, community transport, shared cars, cycling and walking, with appropriate facilities to promote their safe use	IDP recommends integrated bus services at Polegate and Eastbourne stations. As mentioned above, ongoing strategic site discussions aspire to retain and improve transport connections, particularly sustainable transport (e.g. linkage of Polegate-area sites to Cuckoo Trail).
	Promote and lobby for the reinstatement of the Uckfield to Lewes railway line	Core Strategy reflects these aspirations: "Whilst recent studies have confirmed that there is no current operational or business case to reinstate the line to Lewes, it is considered that circumstances and criteria for assessment of any business case may change in the future and the Council continues to support the principle."
	Lobby for further improvements to train services and better station facilities to encourage their use: this includes additional carriages to reduce overcrowding, extra trains later into the evening for leisure purposes, and a simplification of the fare structure to encourage increased use	Improvements to Uckfield Line services (additional carriages, timetabling changes and station improvements at Uckfield itself) either in place or underway. Improvements to other services recommended in Network Rail Sussex Rail Utilisation Strategy but unimplemented as yet.
	Encourage improved access to rail stations by all modes of transport, including provision of adequate parking facilities	IDP recognises this need and notes that developer contributions may be indicated to meet it.
	Raise the profile for further improvements along the A27	IDP identifies improvements to A27 around Polegate as critical to supporting further development in the area.

NB Appendix 1 of the Green Infrastructure paper lays out in more detail the contribution of green infrastructure planning to the delivery of SCS objectives.

Legal Compliance Statement

Has the CS had regard to the Sustainable Community Strategy?

The Core Strategy not only has regard for the Sustainable Community Strategy (SCS), it is the spatial delivery of the SCS vision in Wealden - the two are thoroughly integrated.

The Local Strategic Partnership (LSP) is the body charged with developing and overseeing delivery of the Sustainable Community Strategy. The LDF was introduced to the LSP at their meeting of 23 Feb 2005, and became a standing item on LSP agendas from September 2005. The LSP have played a significant part in shaping the Wealden LDF and have worked with the Planning Policy team to ensure alignment with the SCS. The imprint of the LSP and the SCS is strong in the Development Plans, Statement of Community Involvement and Infrastructure Delivery Plan, just as the LDF work features prominently on the LSP website and in the SCS. Presentations, meetings and events are listed in Background Paper 8 – Summary of consultation and participation.

To focus on the Core Strategy the LSP expanded its membership and attendance to ensure that the SCS themes and the positions of the organisations relevant to them were reflected (e.g. Transport and Access theme – greater Highways Agency participation in 2009). Direct contact between the Planning Policy team and LSP partners was also extensive.

Specific exercises to prepare for, ensure and double-check alignment were carried out in September 2006, January/February 2008 and May 2011 respectively[A]. The main event involving LSP members in this alignment work was on 15 January. Other key meetings and events were the Spring/Summer 2009 board meetings in which the LSP's Core Strategy Spatial Development Options consultation response was agreed; the LSP's Core Strategy priorities workshop on 18 February 2009; the WDC–LSP–developers planning/housing event on 27 May 2009; and the LSP infrastructure event 'Highways to Prosperity' on 24 November 2009.

The LSP also dynamised Parish Council input to the Core Strategy through the LSP Parishes Workshop on 25 April 2007 and the 'Parish Plan – LDF bridging template', through which almost all Parish Councils contributed their top three priorities under each of the SCS themes.

In conclusion, the Wealden Sustainable Community Strategy's vision and priorities are at the heart of the Wealden LDF Core Strategy. This has been achieved through early and regular involvement of the LSP in the development of the Core Strategy documents. Focussed LSP–LDF meetings and events have produced close alignment between the two strategies, including a workshop specifically designed for the purpose.

[A] These are saved in I:\POLICY & PARTNERSHIPS\LSP related\LDF\Core Strategy read across Community Strategy