Wealden District (Incorporating Part of the South Downs National Park) Core Strategy

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Dear Mr Phillips

Wealden Core Strategy

Further to my letter of 7 September concerning the Exploratory Meeting (EM), the Inspector had indicated in his accompanying summary of concerns that there were a number of other detailed matters on which he would be seeking the Council's and the National Park Authority's further views. There are also some points arising from the EM. These queries are set out below (all references to 'the Council' should be taken as also referring to the National Park Authority).

Housing requirement

In his summary of concerns note for the EM the Inspector had asked what the Council's view was of the level of housing need in the District during the plan period. In its written response the Council referred mainly to affordable housing. At the EM the Inspector explored a wider definition of housing requirements. This had not been covered in the Council's written response but you responded verbally at the meeting. He would like to give you the opportunity to summarise your view in writing of the total District requirements (for both market and affordable housing), notwithstanding the infrastructure and environmental constraints, ahead of the hearings so that this is clear to all parties.

Strategic Development Areas (SDAs)

Policy WCS4 simply lists the SDAs and provides no guidance as to the scale or type of development or infrastructure requirements involved. With the exception of SD12 at Frant, the area strategies in section 6 of the document (for example para 6.11 on Uckfield, para 6.31 on Polegate/Willingdon/Stone Cross) provide guidance of this kind for each SDA, set in the context of the wider strategy for the settlement. These paragraphs read as policy. Could the Council explain why it chose to present the CS in this way rather than maintaining a clear distinction between policies and supporting justification? Would it be more appropriate to include the area strategies in policies?

Rural Areas Strategy

As part of the rural areas strategy, Policy WCS6 removes development boundaries from neighbourhood centres or unclassified settlements. At the same time it is proposing

housing allocations in some of these settlements which will be made in the Delivery and Site Allocations DPD. The Local Development Scheme shows that this DPD will not be adopted until the end of 2013. There will therefore be a period within which proposals may come forward relating to these settlements in the absence of both a development boundary and a specific allocation to direct development. Is the Council satisfied that there will be an adequate planning framework in these settlements during this period? The scale of housing allocations in individual villages made in Policy WCS6 is mostly small. Is this level of detail appropriate to a core strategy or should it be a matter for a subsequent DPD?

Affordable Housing

Para 7.13 indicates that it is possible that there may be viability issues on specific sites and para 7.14 refers to flexibility in meeting affordable housing targets where they cannot be achieved due to economic viability. However, this is not carried through into Policy WCS8 which makes no reference to the viability of development. Given the approach in PPS3 and case law and the need for clarity and consistency would the Council consider an appropriately worded change to Policy WCS8 that would introduce a reference to viability? Such a change may meet concerns raised in some of the representations.

In June 2011 there was a change to the definition of affordable housing in Annex B of PPS3 to include affordable rented housing. Does this have any implications for the CS?

Gypsies and Travellers – This will be one of the Inspector's main matters for consideration during the Examination. Representations have been made in relation to Policies WCS10 and WCS11. However, parties have generally not asked to be heard on this matter so he is likely to deal with it by way of the representations made and any further written submissions in accordance with his Guidance Notes. In any further submission on this from the Council in due course the Inspector would wish to see a response to the representations made by the National Federation of Gypsy Liaison Groups and the Traveller Law Reform Project. The Council may also wish to comment on the weight to be attached to the draft PPS on Planning for Traveller Sites and the Government's intention to revoke Circulars 01/2006 and 04/2007.

Green Infrastructure

Policy WCS13 indicates that the Council would require all new residential development to contribute to the green infrastructure network and make provision for new open space. However, in the light of Circular 05/2005 and the CIL regulations, would this requirement apply in all cases even where the existing provision in the locality was adequate? If not then should the policy be amended to bring it in line with national policy?

It would be helpful if the Inspector could be brought up to date on the Council's likely approach to CIL and therefore the role, if any, that it may play in delivering the infrastructure identified in the CS?

Climate Change and Sustainable Construction and Design

The Council has undertaken work in relation to setting a carbon emission target for both residential and commercial properties in the Wealden Renewable Energy Study. There are no policies for sustainable construction in the CS and the question of

imposing targets appears to be one which will be addressed in subsequent DPDs. However, para 7.29 of the CS indicates that in the light of proposed revisions to Part L of the Building Regulations it will not be necessary to duplicate a similar provision, *albeit more rapidly implemented,* in the CS. The reference to more rapid implementation seems to run ahead of policy. Is it necessary to include this in the CS when presumably it is intended that the matter should be subject to public examination in the context of a later DPD?

Monitoring and Implementation

PPS12 indicates that core strategies should include clear arrangements for monitoring and reporting. Monitoring provides the basis on which the contingency plans within the strategy would be triggered. The delivery strategy should contain clear targets or measurable outcomes to assist this process. The CS includes a short section on delivery which touches on monitoring. However, the detail on monitoring is contained in Background Paper 13: Implementation and Monitoring Framework (BP13). Is the Council satisfied that this approach is compatible with the requirements of PPS12? Amongst other things, BP13 sets out a series of indicators and targets relating to objectives in the Sustainability Appraisal. These are expressed mostly in general terms. There are no milestones or trigger points and consequent actions should monitoring show that targets are not being met. Should there be a clearer indication of the circumstances under which the strategy might need to be adjusted and what the appropriate courses of action might be?

Proposals Map (PM)

At the EM the Inspector discussed with you whether the zonings relating to Ashdown Forest and referred to in CS para 3.32 should be shown on the PM. The Council's approach is that the detailed policy will be included in a subsequent DPD and therefore presumably the PM would be amended at that stage. The Inspector understands the logic of that but nevertheless the development strategy in the CS is based in part on the measures included in para 3.32. In that context, can the Council consider whether an appropriate brief reference to the intention to introduce the 400m and 7km zones, with the detail to be provided in a subsequent named DPD, could be introduced into a policy, perhaps WCS12. That would leave the detail and PM changes to the later stage but also confirm that these measures are a crucial component of the CS.

The Inspector would be grateful for the Council's response to these matters by 2 December 2011.

Yours sincerely

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