Matter 10 /WDC

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

Core Strategy Hearing

Matter 10: Heathfield Area Strategy
- Statement by WDC/ SDNPA

December 2011

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

Matter 10:Heathfield Area Strategy (WCS2,WCS3,WCS4)

A) have reasonable alternatives to the strategy been considered ?

1.1 Within the Council's issues and Options consultation of 2007 we set out and consulted upon possible spatial objectives for Heathfield, and showed by Figure 15 and Table 3 of that document (pages 61-65) the main options and alternatives for development in and around Heathfield. The town is tightly surrounded/constrained by the nationally significant landscape of the High Weald Area of Outstanding Natural Beauty - as shown on figure 15 referred to above. Indeed all of the land submitted through SHLAA in respect of Heathfield was in the AONB.

1.2 For each of the broad areas of possible growth which we looked at we set down the approximate scale of development together with identified impacts and issues to be considered in respect of e.g. landscape and biodiversity, transport and accessibility and infrastructure and services. Consultation questions were asked in respect of six possible areas for growth, as identified in the 2007 consultation, together with a further set of questions which also asked whether there were any other areas for growth that people felt the Council should consider.

1.3 The evidence base and the development of the six housing options subject of consultation in the Spatial Development Options are documented in the background papers to the 2009 Spatial Development Options Consultation (document references C1-C12). These Options were also subject to Sustainability Appraisal which was published for consultation at the same time as the Spatial Development Options Consultation. The consultation responses to the Spatial Development Options lead to the LDF Sub Committee agreement on 16th December 2009 to a way forward to reduce the amount of alternatives for the purposes of testing, including the need to follow the broad distribution of growth set out in the South East Plan.

1.4 Working with the Local Strategic Partnership and other partners we further developed this work through to the 2009 consultation on six possible spatial options for housing growth and assessed these against key elements of our emerging vision for growth (paragraphs 2.13-2-19 of 2009) and Part 3 - Strategic spatial housing options.

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1.5 Our SHLAA has further enabled us to test and progress alternatives where we are aware that landowners are willing to work with us to deliver our strategy. However a number of the broad locations considered in 2007 have subsequently been rejected following discussions with ESCC regarding transport difficulties.

1.6 Background paper 1 Development of the Core Strategy sets out at page 51-66 how we have considered the development potential of each of our towns including taking into account emerging or published town masterplans for the area. For each Town we set out matters relating to housing land availability, a sustainability appraisal summary and a strategy for that Town. The sustainability summary is accompanied by a plan showing the broad alternative locations considered for growth in each town. Paragraphs 8.54 - 8.59 of BP1 deal specifically with Heathfield and figure 6 on page 65 shows the broad locations. We consider that reasonable alternatives to the Strategy have been considered.

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

2.1 There is some natural overlap with the audit trail set out in response to the previous question regarding consideration of broad alternatives for growth in Heathfield and of proposed strategy for Heathfield which details how that strategy for Heathfield and the selected choice of SDA11 was arrived at.

2.2 The matter of ***how*** the strategy was arrived at is partly covered above in the answer to the previous question but is further supported by the consultation work carried out in 2007 and also in respect of emerging town masterplans .BP7 Summary of town masterplans identifies the work that has been carried out locally and details how this has helped shape the development of the Core Strategy. This work has helped to identify Town Objectives which then have informed the strategies for the towns themselves and as set out in the Core Strategy. Paragraph 5.7 of BP10 Sustainability Appraisal of the Core Strategy refers to Heathfield and the objectives for the town.

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2.3 The submitted Sustainability Appraisal for the Core Strategy Background Paper 10 also helps in showing why the given strategy is arrived at. It details from page 40 of the document ,paragraph 5.7 of the document the objectives for each of the Towns, objectives arrived at following widespread consultation. We then list each of the principal Objectives for each of the Towns and explain that these have helped shape and inform the strategies for each of the Strategies for the Towns which appear in the Core Strategy itself. BP10, page 40, Paragraph 5.7 Objectives 1-5 set out those objectives for Heathfield. At Figure 8.2, on page 76 of the paper we set out the broad locations for development being considered and a detailed commentary on these when assessed against the Councils 22 approved sustainability objectives. These are set out for Heathfield , and indeed for all of the towns, as assessed against social, environmental and economic objectives. Pages 76-79 of BP10 refer specifically to Heathfield.

2.4 In arriving at **why** the strategy has been selected the SA also identifies for each Town the broad and reasonable alternatives considered and sets down a summary of the reasons why any particular area was selected or not taken forward. In respect of the broad locations for Heathfield this is set out at pages 102-103 of BP10.The SA process, which has been integral to the development of the Core Strategy also sets out at page 110, in Table 9.1 of BP10 how each of the Policies within the CS (including WCS2,3and 4) fare when assessed against each of the Councils 22 adopted sustainability objectives. We conclude that this work demonstrates both how and why we have arrived at the preferred strategy and the selection of SD11 for growth of Heathfield.

2.5 The background papers supporting the SA of the Core Strategy set out in specific detail (document reference A3, SA background papers) the sustainability appraisal of the broad locations for the development of each of the towns. Appendix 1 of this paper, at pages 207-212 shows the broad locations for growth considered whilst pages 213 -237, Appendix 2 Matrix tables shows the full assessment of broad locations. This detailed work further supports why the preferred strategy and choice of strategic development areas has been arrived at.

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C) have the infrastructure implications of the strategy clearly been identified and supported by the evidence base? Is it clear who is going to deliver the required infrastructure and by when?

3.1 Our strategy is supported by our Infrastructure Delivery Plan, which is a living document and has been compiled with inputs from all relevant infrastructure providers as this is a "living" document and one that will be being updated by partners in respect of there various interest and responsibilities there are two submitted background papers BP11 and BP11 "proposed changes".

3.2 Within BP11 at page 42 we set out in tabular form any key or critical infrastructure requirements for the growth identified for Heathfield at Strategic Development Area SDA11. Whilst each of the various possible infrastructure matters associated with development are set down in the table there are no identified capacity issues predicted for transport, education (all phases) waste, or waste water, and health. We identify that ESCC Children's services has indicated that they would maybe need to consider the implications further and that provision as outlined in the table may require adjustment. The IDP itself and the tables within it have been compiled and updated on the basis of close consultation with the infrastructure providers in respect of the proposed growth in the core strategy and based upon their information as provided to us. This has included the sharing of the information from an extensive LDF evidence base with partners and providers of infrastructure.

3.3 In respect of Heathfield there are currently no changes needed in respect of the IDP (BP 11 Infrastructure Delivery Plan - proposed changes). In conclusion we therefore consider that the infrastructure implications for SD11/Heathfield have been clearly identified, are supported by the evidence base, and the responsibility for any provision of infrastructure made clear.

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

4.1 The Council continues to work with landowners and their agents in seeking to ensure delivery of the growth proposed in its core strategy. We are aware that additional work and various studies have been carried out by the principal landowner and in discussions with him and his agent we are confident that growth in SDA11 can be delivered within the period identified in the core strategy.

4.2 We have however set out in our monitoring framework and Annual Monitoring Report (AMR) the measures that we would take should delivery not be forthcoming. Within Heathfield most if not all alternatives would necessitate land being used within the AONB, indeed SDA11 is itself within the AONB but other consideration of local need and a very sustainable site were considered to outweigh this. Whilst additional land around Heathfield was put forward under SHLAA this was not deemed suitable for any broad area of growth or indeed this scale of growth for the town. In the unlikely event of any difficulty in delivery on SD11 this could be reviewed. We consider that our arrangements for monitoring the delivery of the strategy are sufficiently flexible to accommodate this and our approach for dealing with such matters is set out clearly within the core strategy at 8.4-8.6 and within our AMR.

E) Is SD11 justified and deliverable ?

5.1 We consider that SDA11, which is acknowledged as lying within the formally designated High weald Area of Outstanding Natural Beauty (AONB), is justified. This is for a number of key reasons.

5.2 Firstly there is, as identified in our SHLAA, no land available other than land that is within the AONB and even though important AONB designation does nevertheless allow consideration of development in order to meet local needs.

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5.3 Secondly Heathfield, though by some margin Wealden's smallest town (population c 7,500) is a thriving town that has local needs both in respect of affordable and other housing. It also has its own aspirations for growth as set down in its local masterplan work (BP 7) and this was reflected in the Parish Council's response to the 2009 spatial development options consultation and when the Parish Council advised us of its preference for growth for some 140 houses (see Appendix 1, page 79, of BP1 Development of the Core Strategy).

5.4 Thirdly we consider that the SDA11 identified is a very sustainable and accessible location for the town centre, with no acknowledged infrastructure delivery or capacity concerns. Sustainability Appraisal work (BP10) has clearly shown that this land scores much more highly when compared with other possibilities submitted under SHLAA.

5.5 Finally we are aware of work carried out that will, we consider, enable successful implementation of a scheme that will not have significant strategic adverse impact upon the AONB landscape.

5.6 As referred to in the reply to the previous question we have been working closely with landowners and agents to ensure that SDAs proposed within the strategy are deliverable and achievable. We have confidence that the SD11 is both justified and deliverable.

F) Have reasonable alternatives to SD11 been considered - omission sites?

6.1 Yes. This is set out within the earlier responses to Matter 10: questions a-e and in which we have set out the approach to consulting upon, gathering evidence, considering, and subsequently testing through SA the alternative broad options for growth, the broad locations for growth in Heathfield that were looked at (e.g. as set out at pages 76-79 of BP10 Figure 8.2 and table 8.4 of BP10 - Sustainability Appraisal). This, together with that section of table 8.10 referring to Heathfield, pages 102 -103 of the document - options selected and reasons and use of our SHLAA evidence we consider that we have shown that reasonable alternatives and omission sites have been considered in arriving at the preferred strategy .