Matter 15 /WDC

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

Core Strategy Hearing

Matter 15: Infrastructure - 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 15: Infrastructure (WCS7, WCS13)

A) Have the critical infrastructure requirements in the Infrastructure Delivery Plan been justified by the evidence base? What would the consequences for the strategy if any of the critical infrastructure was not delivered? Is there sufficient commitment at this stage from the relevant organisations responsible for delivery?

1.1 The Infrastructure Delivery Plan (reference A25) has been produced from information provided by our key infrastructure providers, and based on a robust evidence base. The critical infrastructure includes:

- Environmental mitigation relating to the Ashdown Forest;
- Schools Provision - Primary and Secondary;
- Road network provision including South Wealden and Uckfield; and
- Waste Water.

1.2 The evidence base relating to the mitigation required for the Ashdown Forest is covered in Matter 14 relating to The Environment, Climate Change and Sustainable Construction. The evidence base includes The Assessment of the Core Strategy under the Habitats Regulations (reference A24), the study relating to Visitor Access Patterns on Ashdown Forest (reference K2), the Ashdown Forest Visitor Survey Data Analysis (reference K4) and The Assessment of the Increase in Traffic Resulting from the Proposed Submission Core Strategy on the Ashdown Forest Special Area of Conservation and the Lewes Downs Special Area of Conservation (reference K5).

1.3 Future planned provision of schools and school places is informed by the pupil number projections generated by East Sussex County Council's (ESCC) Pupil Forecasting Model. ESCC has a statutory duty to ensure the adequate supply of school places across the District to meet current and future demand. ESCC is responsible for planning, organising and commissioning school places in a way that promotes high educational standards, ensures fair access to educational opportunity, promotes the fulfilment of every child's educational potential, promotes diversity and increases parental choice.

Wealden District Council and South Downs National Park Authority
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1.4 Pupil forecasting is updated on a annual basis, the results of which are contained within the Infrastructure Delivery Plan (reference A25), and are validated by the Statement by East Sussex County Council, October 2011 (reference U27).

1.5 The evidence base for the road network in south Wealden is contained within the South Wealden and Eastbourne Transport Study (SWETS) (reference N1), which has recently been reviewed to take into account recent changes to Integrated Transport and Economics and Appraisal (TEMPRO). This additional work has not changed the SWETS outcomes. This report is appended to the Statement by East Sussex County Council in relation to this Matter. In addition, the Statement by East Sussex County Council provides the Highways Agency assessment of the suitability of the SWETS model for assessing the impact of development in the South Wealden area.

1.6 The evidence for the need for Uckfield Town Centre improvements is detailed in the Uckfield Transport Study (2010) Interim Report Published in August 2010[1].

1.7 The critical Issues in relation to waste water primarily relate to the need to undertake works to increase the treatment capacity of Hailsham North Waste Water Treatment Works to the consented capacity and the study into alternative discharge locations. However, it is established in the IDP (A25) in Table 3 that funding is in place for both issues, and the work is commissioned.

1.8 Therefore it is concluded that the critical infrastructure requirements in the Infrastructure Delivery Plan been justified by the evidence base.

1.9 All the infrastructure listed as critical has an impact on growth. If they are not delivered these essential requirements will limit growth taking place as shown in the Core Strategy, and the information concerning the risk is contained within Appendix A of the Infrastructure Delivery Plan (reference A25). This is in conformity with Policy CC7 of the South East Plan.

[1] http://www.wealden.gov.uk/Wealden/Planning_and_Building_Control/Planning_Policy/Planning_Policy_Publications/Evidence_Base_for_LDF/Planning_Evidence_Base_for_LDF_Transport.aspx

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

1.10 In terms of delivery, SANGs provision has been dealt with as part of Matter 14. In relation to the other mitigation requirements relating to the Habitats Directive we are working with the Conservators to achieve the most acceptable forms of mitigation on the Ashdown Forest with delivery through the Conservators of Ashdown Forest[2]. These measures will be provided through the Strategic Sites Development Plan Document.

1.11 Schools provision will be through East Sussex County Council, working within a system which allows the formation and management of schools through various mechanisms. East Sussex County Council has a duty to ensure the adequate supply of school places and therefore is committed to undertake appropriate delivery actions.

1.12 We are currently working with East Sussex County Council and the Highways Agency to deliver highway improvements in both South Wealden (where the Highways Agency are a relevant partner) and Uckfield. East Sussex County Council are fully committed to delivering the necessary solutions with a programme of actions to deliver. These programmes are provided within the supporting statement by East Sussex County Council (reference U27, paragraphs 3.38 and 3.46) with an update provided in the statement to this matter by East Sussex County Council.

B) Is it clear what infrastructure is required for the first 5 years of the plan and who is going to fund and provide for it?

2.1 Appendix A to the Infrastructure Delivery Plan (reference A25) provides the approximate timings of delivery for infrastructure. Implementation mainly relates to the phasing of development, which is identified in the Core Strategy (reference page). However, further iterations of the Infrastructure Delivery Plan, particularly through the Strategic Sites Development Plan Document may have an impact of delivery requirements and the phase approach to infrastructure delivery. The funding requirements are also shown in Appendix A as well as the delivery agencies involved.

[2] More information concerning the Conservators can be fount at http://www.ashdownforest.org/governance/conservators.php

Wealden District Council and South Downs National Park Authority
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C) Does the Core Strategy take sufficient account of the introduction of the Community Infrastructure Levy?

3.1 The Core Strategy identifies the introduction of a tariff based system to collect developer contributions (paragraph 7.5). The use of a charging schedule or Section 106 legal agreements to fund infrastructure is a matter to be considered based on the requirements of the District as well as the Community Infrastructure Levy Regulations. The Council has recently published it proposals for the delivery of a Community Infrastructure Levy (CIL) Charging Schedule through its revised Local Development Scheme. It will be structured so that it will tie in with the Strategic Sites Development Plan Document using a shared evidence base, and it is anticipated to by adopted prior to March 2014. This will allow developers of strategic sites to be aware of the Council's Charging Schedule, particularly for strategic infrastructure. Therefore for this examination, the publication of the revised Local Development Scheme publishing the intentions regarding Community Infrastructure Levy is considered material to the Core Strategy examination and account taken of CIL.

D) Does the Core Strategy provide an adequate basis for the achievement of more sustainable forms of transport and travel? Should there be a policy setting out the transport strategy for the District?

4.1 The distribution of growth and change within the Core Strategy is based upon the achievement of more sustainable forms of transport and travel, taking into account accessibility and reducing the need to travel by car. This is shown in Strategic Planning Objective 7 (Core Strategy reference A1, page 23).

4.2 The focus upon towns, train stations, bus services and walking and cycling forms a fundamental approach to the strategy through the distribution of growth, as shown in the settlement hierarchy (Background Paper 1 reference A17, Appendix 3 pages 85 to 94) and the selection of relevant broad locations as detailed in the Sustainability Appraisal Report (reference A2) and Background Paper 5 reference A3). In addition, the implementation of SWETS and the Uckfield transport solution will also require more sustainable forms of transport and travel.

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

4.3 It is considered that appropriate policies in the Strategic Sites Development Plan Document and an overall policy for windfall and other developments in the Delivery and Site Allocations Development Plan Document should sufficiently meet the requirements for sustainable forms of transport and travel, based on Strategic Planning Objective 7 (Core Strategy reference A1, page 23). Therefore, a discrete transport strategy is not required within the Core Strategy.

E) Does the requirement for all new residential development to contribute to the green infrastructure network and make provision for new open space in Policy WCS13 accord with the tests in Circular 05/2005 and the CIL regulations?

5.1 This matter in relation to open space provision is dealt within the Response to the Summary of Inspector's Concerns and Letter dated 31st October 2011 (reference Y10, paragraphs 6.1 to 6.2). In summary it is considered that in order to meet the tests in Circular 05/2005 and the CIL regulations it is proposed to change the text in policy WCS13.

5.2 In terms of Green Infrastructure, it is considered that development of any site either green field or brown field will require additional green infrastructure. This is to not only off set any biodiversity loss, which may be more relevant to greenfield sites and to redundant brown field sites but also to adapt to climate change and to provide for public access which will be as relevant to brown field sites. This may be in the form of retaining and enhancing green infrastructure and creating new Green Infrastructure. Each new element will be an increase in provision secured and maintained for Green Infrastructure purposes.