MATTER 2: SETTLEMENT HIERARCHY AND RURAL AREA STRATEGY (WCS6)

Main Issue – Whether the settlement hierarchy and strategy for rural areas are soundly based

Summary of Response – The settlement hierarchy does not categorise the settlements appropriately and is not based on objective, clear criteria. The data used to assess towns and villages address different criteria and is not comparable. It is submitted that the Settlement Hierarchy is not based on robust evidence. It is, therefore, 'unsound', as defined by Planning Policy Statement 12.

A) Are the categories in the Core Strategy settlement hierarchy appropriate and justified?

1.1 No. The proposed settlement hierarchies are not developed through the various stages of the process and there is no information in the evidence base to back up or explain the approach that is now proposed. In addition, there are too many categories and each category is too loosely defined.

1.2 The Issues and Options document briefly addresses the settlement hierarchy. It describes Crowborough, Uckfield, Heathfield, Hailsham and Polegate/Willingdon as market towns (paragraph 1.26). Figure 11 suggests a settlement classification based on:

- towns of 7,500 people or more;
- larger service villages of 2,000 people or more;
- smaller village local service centres of 100 people or more;
- other smaller villages and hamlets comprising of all other settlements.

1.3 In Matrix A of Background Paper: Draft Settlement Strategy for the Villages, which supports the Issues and Options document, each village is analysed but not categorised in accordance with the level of services provided.

1.4 The Spatial Development Options document expands on options for future development. It does not propose a settlement hierarchy. This document is supported by Background Paper 1: Wealden Profile. Section 7 of this document compares, but does not categorise, each of the five towns on the basis of services, demographics and accessibility. This assessment of towns is not directly comparable with the assessment of villages described above, which raises concerns about the use of this data to categorise settlements within a single settlement hierarchy.

1.5 Table 1 of the Core Strategy (CS) outlines the settlement hierarchy, using a number of settlement types that are not considered or addressed in the previous documents. This is supported by Appendix 3 of Development of the Proposed Submission Core Strategy Background Paper. The two main criteria for determining the rank of a settlement in the hierarchy are stated as being accessibility and self sufficiency[1].

1.6 It is submitted that the proposed settlement hierarchy is not based on any previously discussed categories. There is no evidence to back up the categorisation of each of the

[1] Page 72, Appendix 3 of Development of the Proposed Submission Core Strategy Background Paper

settlements in accordance with this hierarchy. Such evidence would provide clarity regarding the considerations that influenced the categorisation of each settlement.

1.7 It is considered that the settlement categories are poorly defined. The criteria set out in page 72 of Appendix 3 of Development of the Proposed Submission Core Strategy Background Paper, do not have a clear relationship with the settlement categories described on page 73 of the same document and on pages 9 and 10 of the Core Strategy. For example, the current description of a district centre refers to a settlement with a range of services including a secondary school, which is accessible by road and public transport. It is submitted that a district centre could be described as having 'very good accessibility' and as being 'self sufficient'. This would provide a clearer definition of a district centre.

1.8 The lack of clarity becomes more apparent at the lower end of the hierarchy, in relation to local service centres, neighbourhood centres and other unclassified settlements. For example, the description of a service centre does not include a reference to public transport provision, which such a settlement would undoubtedly require.

1.9 There are also too many categories of settlement. As outlined above, the various categories are poorly defined and as a result, there is little apparent difference between a local service centre and a neighbourhood centre.

1.10 In summary:

- analysis of towns and villages is not comparable, which raises doubts about the categorisation of these settlements in a comparative settlement hierarchy;
- there is no clear link between the types of settlements discussed in the various stages of the process and those in the Core Strategy;
- the settlement types are poorly defined and there is no clear link between the accessibility and self sufficiency criteria and the settlement hierarchy;
- there are too many categories of settlement, which are not sufficiently different from each other.

B) Does the evidence base support the position of individual settlements within the settlement hierarchy?

1.11 No. The evidence base does not support the position of individual settlements within the settlement hierarchy. A clear example of this is the position of Polegate in comparison with that of Stone Cross.

1.12 The Issues and Options document briefly addresses the settlement hierarchy. It describes Crowborough, Uckfield, Heathfield, Hailsham and Polegate/Willingdon as market towns (paragraph 1.26). Figure 11 suggests a settlement classification based on:

- towns of 7,500 people or more;
- larger service villages of 2,000 people or more;
- smaller village local service centres of 100 people or more; and
- other smaller villages and hamlets comprising of all other settlements.

1.13 The list of larger local service centres includes Stone Cross, but does not include Polegate. In figure 13, Polegate/Willingdon is shown as a town and Stone Cross is shown as a large village local service centre with growth potential. In Figure 12, a village with growth potential is a village with access to within 5km (3.1miles) of a rail station, with a weekday bus service. Development in such villages should not increase the population by more than 15% of the existing population (Figure 12) over a 10 year period. This approach is supported by a background paper, entitled Draft Settlement Strategy for Villages, which categorises the villages by existing services.

1.14 In Matrix A of Background Paper: Draft Settlement Strategy for the Villages, which supports the Issues and Options document, Stone Cross is noted as having a population of just under 3,000, a nursery, a primary school, a doctor, a dentist, a dispensary, a public house, a place of worship, a community hall, employment opportunities, a play area and playing pitches. The matrix also notes that, unlike Polegate, Stone Cross is not within two miles (3.2km) of a train station and does not have a post office, a library or a petrol station.

1.15 The current Core Strategy figures significantly increase the population of Stone Cross above the 15% limit described above. A rough estimate is outlined below:

- Stone Cross has a population of just 2842 people
- The number of dwellings proposed in the area is 650 between 2015 and 2028 (figure 5 of Core Strategy), which averages 500 dwellings over a ten year period;
- With an average household size of 2.3, which is higher than might be expected in Stone Cross and in the future[2], this results in a population increase of 1150;
- This results in a population increase of circa 40%[3].

1.16 By contrast, based on a similar calculation, Polegate will experience an 18% population growth over 10 years. Polegate is better serviced and more accessible than Stone Cross; it is not considered sustainable to concentrate a greater population growth in smaller settlements[4].

1.17 The Spatial Development Options document expands on options for future development. It does not propose a settlement hierarchy. This document is supported by Background Paper 1: Wealden Profile. Section 7 of this document compares the data available for each of the five towns, including Polegate. Although Polegate has the smallest population, it has more business space than Heathfield and a reasonable number of retail units, including 6 convenience stores, 20 comparison stores and 23 service outlets. It also has a primary school, a nursery, two doctors and a dentist, the second highest number of bus services in the district and a railway station. This data overlooks that Polegate/Willingdon has a secondary school (Willingdon Community School) which is approximately 1 mile from Polegate Rail Station and is very accessible from the town centre.

1.18 Table 1 of the Core Strategy outlines the settlement hierarchy, using a number of categories that are not considered or addressed in the previous documents. It is noted that

[2] http://www.communities.gov.uk/documents/statistics/pdf/1172133.pdf
[3] [{(650/13)*10*2.3}/2842]*100=40.4%
[4] 636*2.3/7929*100=18.44%

Polegate/Willingdon is not classified as a district centre, but as a service centre, which is the same category as Stone Cross. This is supported by Appendix 3 of Development of the Proposed Submission Core Strategy Background Paper. The two main criteria for determining the rank of a settlement in the hierarchy are accessibility and self sufficiency (pg 72). One of the criteria for self sufficient settlement is access to a secondary school.

1.19 There is an apparent inconsistency between the ranking of settlements, as exemplified by Polegate/Willingdon and Stone Cross. As outlined above, Polegate/Willingdon is a highly accessible location with a range of shops and facilities and with a secondary school in Willingdon, which is not acknowledged in the evidence base. In Appendix 3 of Development of the Proposed Submission Core Strategy Background Paper, Polegate is described as having good connections and an above average service provision, but as being dependent on Eastbourne. Stone Cross is briefly described as self-sufficient. It should be noted that, unlike Polegate, Stone Cross does not have a train station, a library, a filling station, a secondary school or a post office and does not have the range of shops available in Polegate. In addition, Stone Cross is dependent on Polegate for access to the rail network (see plan in Appendix 1).

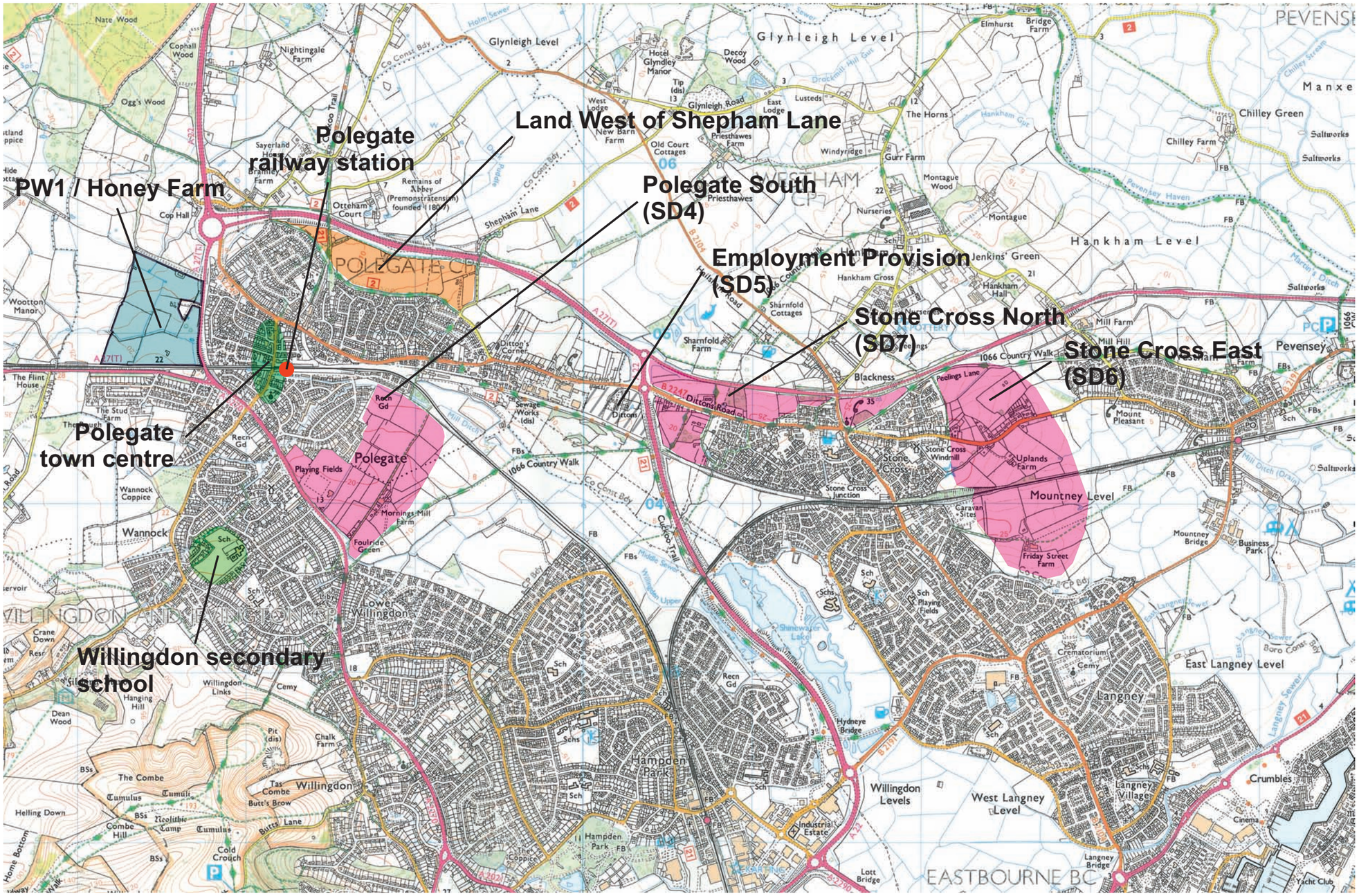
1.20 Polegate is not completely self sufficient. This is true, however, of all of the settlements in Wealden, as there is no primary centre or secondary centre in the district. It is submitted, however, that Polegate is well served by transport, having access to both a railway station and the second highest number of bus routes in the district and has a range of services to provide for the everyday needs of residents, including a secondary school. Stone Cross has less than 40% of the population of Polegate (c.8000 v c.3000), has fewer services and is less accessible. It is not justifiable to place these towns in the same category. Polegate is one of the towns of Wealden and should be regarded as a district centre. Stone Cross cannot be regarded as self sufficient as should be categorised as a local service centre.

1.21 In summary, the settlement hierarchy is not justified. The criteria are incorrectly and inconsistently applied, particularly in relation to Polegate/Willingdon and Stone Cross.

APPENDICES – TABLE OF CONTENTS

Appendix 1: Figure 1 – Polegate and Stone Cross Potential Development Areas

APPENDIX 1: FIGURE 1 – POLEGATE AND STONE CROSS POTENTIAL DEVELOPMENT AREAS



KEY

Land West of Shepham Lane

PW1 / Honey Farm

Wealden District Council Proposed Submission Core Strategy - Area Strategy:

Proposed Development Area

Area of Employment Provision

N

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Project
POLEGATE - Core Strategy EIP

Drawing Title
Potential Development Areas

Scale
1:25,000 at A3

Date
DEC 2011

Drawing No.
Figure 1