Wealden District (incorporating part of the South Downs National Parks) Local Development Framework

Core Strategy Development Plan Document

Examination

Further Statement

MATTER NO: 2

Settlement Hierarchy and Rural Area Strategy
Core Strategy Policy WCS6

A.	**What part of the CS is unsound?**	**Policy WCS6**
B.	**Which criterion is failed?**	**Justified**
C.	**Why does it fail?**	

Context

All the Examination Matters identified are linked, Matters 1-4 on the spatial strategy, settlement hierarchy, housing and local economy, particularly so. The settlement hierarchy cannot be considered in isolation of these other matters.

Prior to the exploratory meeting, and at that meeting itself, a primary concern was the level and distribution of housing proposed in the Plan and the extent to which that had been influenced by the European sites. On the scale of provision, the CS provides a 25% reduction in housing up to 2026 compared with the South East Plan with the bulk of the shortfall occurring in the Sussex coast sub-region. Enclosed with a WDC letter dated 2 December 2011, in response to the Inspectors summary of concerns and letter of 31 October 2011, the council published a paper that converts population projections and housing requirements in to dwelling numbers. The upshot of this is that when the housing provision in the Core Strategy up to 2026 and 2030 is measured against

housing requirements, whilst it appears that the Plan may meet housing requirements in the south, there could be a significant shortfall inland.

WDC asserts the CS is in general conformity with the SEP, including the Regional Plan's Housing allocation. Also, that it meets housing requirements up to 2026 (Para 1.33 of WDC 2 December 2011 letter). WDC says it achieves this by having full regard to the Habitats Regulations and additional factors. A resulting settlement stratification is illustrated in Appendix G of the WDC letter to the Inspector dated 3 October 2011.

Just as the Council picks out and uses those elements of evidence to support its case, so we can show how the Core Strategy could have difficulty in delivering its vision and objectives –

a. The CS is required to be in general conformity with the Regional Plan, but as indicated above it fails to provide the housing levels set for the Sussex Coast. That allocation forms a key part of the spatial strategy for the sub-region where the challenges are identified as being, inter alia, to improve economic performance and to deliver sufficient decent homes (para. 17.2, SEP, 2009). The Core Strategy does not reflect this emphasis upon economic growth and regeneration in the South East Plan.

b. WDC presents a range of projection data in its 2 December 2011 letter. It calculates housing requirements based upon forecasts of district trends and an ESCC migration led variant. 2008 based ONS/CLG projections are summarily discounted as "the least likely to reflect local circumstances". Different permutations of projections would produce a higher or lower estimated demand. The council's approach produces a conservative estimate of future housing requirements. Notwithstanding this, the calculations reveal a significant potential shortfall within the rest of the Wealden area over the Plan period.

This provides in part at least the context in considering matter 2.

D. How the CS can be made sound

These sub headings refer to the issues raised under matter 2.

Settlement Categories (2a):

Policy WCS 2 and Fig. 11 show where housing development should go. The categories of the settlement hierarchy shown in Figure 2 seem appropriate and justified.

Position of Settlements (2b):

WCS1 housing levels should be raised to meet the SEP target up to 2026 and housing requirements up to 2026 and 2030, for the district as a whole and by sub area.

The Council maintains that its 9,600 dwelling total is the present and foreseeable capacity of the district to accommodate housing development up to 2030 having regard to the Habitats Regulations and additional factors. The impacts of the Ashdown Forest and the Pevensey Levels will be considered further elsewhere at this Hearing.

If the impacts of the Ashdown Forest and Pevensey Levels are so profound, what alternative infrastructure etc based strategies have been examined alongside Scenario C?

If further capacity cannot in fact be found within the Ashdown Forest zone of influence, and within the Pevensey Levels catchment areas, a variant to Scenario C would be for the Plan to allow for more development outside these areas. This would require amendment to WCS6.

Potential development within the Plan area is therefore significantly constrained as evidenced by the plan at Appendix G referred to above. WCS5 deals with managing the release of land and states that if circumstances dictate it may be

necessary to encourage or hold back new development. In the event of the former, the Plan should indicate how this is to be achieved. One mechanism would be for the Plan to recognise contingency sites which could act as a reserve in case housing supply stalls.

Village Allocations (2c):

The CS provides an overall rural area dwelling figure of at least 455 new dwellings. It also disaggregates this by showing broad development levels for individual villages. It is clearly appropriate to indicate the overall scale of rural housing. We believe that it is also appropriate to indicate the scale of new housing development in individual villages. Individual village allocations will add much needed certainty to the Plan. For reasons cited by the council, and with which we agree, the allocations provide the basis for neighbourhood planning and a context should applications be made prior to adoption of the SADPD.

The development shown for each settlement in WCS 6 is taken to be a minimum. If that is a correct interpretation, then the Figure 11 annotation should be amended accordingly to reflect this.

Amendment to development boundaries (2d):

The Appendix G plan (referred to above) shows settlements where development is constrained due to the Ashdown Forest and Pevensey Levels. Settlements falling outside are less constrained although they are affected by additional factors that have been taken into account by the council. In written evidence, we have said the growth centres identified by the council should retain, or have defined, development boundaries – in light of the Appendix G plan, we believe that this should be limited to those settlements lying outside the Ashdown Forest zone of influence and the Pevensey Levels catchment areas.

E. Precise Change/Wording sought

- That WCS1 housing provision be raised to accord with the SEP up to 2026 and housing requirements up to 2026 and 2030, overall and by sub area.

- That in recognition of the constraints imposed upon development within the district and given the uncertainty surrounding future housing delivery, we urge the council to consider including contingency sites to back up potential shortfalls eg. within the Polegate/Willingdon and Stone Cross area (see also statement made under Matter 8). This would add flexibility to the Plan and more certainty to WCS5.

- That the rural area housing provision be increased outside the Ashdown Forest zone of influence and the Pevensey Levels catchment areas with consequential amendments to WCS6.

- That the Fig. 11 annotation be amended to reflect the wording of WCS6 which refers to the development indicated being a minimum.

- That growth areas outside the Ashdown Forest zone of influence and Pevensey Levels catchment areas retain/be given development boundaries.