Matter 2 /WDC

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

Core Strategy Hearing

Matter 2: Settlement Hierarchy and Rural Areas 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 2 : Settlement Hierarchy and Rural Areas Strategy (WCS6)

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

1.1 The Core Strategy work on developing a hierarchy of settlements was initiated in the 2007 Issues and Options consultation. At section 4, paragraph 4.27 of that document we set out why we consider that some form of classification of rural settlements is needed and refer to the National Planning Policy guidance set out in PPS7 which requires certain villages to be classified as " local service centres" with development focussed upon such centres (paragraph 4.29). The 2007 consultation was accompanied by a background paper on the methodology for classification of settlements (title reference of this paper D5).

1.2 Figure 11 and paragraphs 4.30 - 4.37 of the 2007 Issues and Options consultation set out the basis and criteria for classifying settlements and the summary box on page 44 identified those settlements which, using these criteria would fall to be considered as larger local service centres and smaller local service centres. Figure 12 on page 45 suggested how this might equate to the ability of a village to accommodate growth. BP1 Development of the Core Strategy sets out the detailed criteria that have been used in classification of our settlements looking at the role and function of the settlement and factors such as accessibility and service provision. This work developed further the initial (2007) work on settlement classification and in particular looked at placing more emphasis on accessibility in terms of public/sustainable transport. This work was fed in to and identified seven types of settlement based upon accessibility and the range of services/role that was provided by the settlement in question. At pages 88-94 we indicate which type of centre any particular settlement falls within and why. Appendix 4 of the BP (pages 95-98) shows a detailed matrix of facilities within each based upon the latest and best information supplied to the Council at that time by the Town and Parish Councils.

1.3 We consider that the approach detailed in these documents together with the criteria used and inventory of facilities provides an appropriate and justified settlement hierarchy for the District .

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

2.1 The 2007 consultation document put forward a suggested settlement classification for consideration and identified an initial classification together with an explanation of what this might mean in terms of village growth potential Questions 7a-7e sought specific views on this matter. A detailed background paper outlining the methodology used for assessing and arriving at the settlement classification was also available on the council's website. This emerged from stakeholder consultation at the 2007 parish conference and further work with the LSP and where the general thrust of this work received support.

2.2 The 2009 Spatial Development Options consultation set out a variety of options for meeting growth, including for proportionate growth within the existing settlement hierarchy, and for each then identified a summary of what such growth might mean for the rural settlements/ parishes. Each of the six possible housing distribution options was accompanied by a brief description, a plan showing the resulting pattern of growth and summary tables of indicative numbers of additional houses to be provided in each town or parish. A summary of the sustainability appraisal of each was also set out in this document and questions were posed as to which people felt was the most appropriate housing option for Wealden.

2.3 Background Paper 1 on the development of the submission core strategy sets out in detail at Appendix 3 (pages 71-80) how we have developed our methodology in respect of Rural Settlement Classification based upon accessibility of settlements and their self sufficiency. These were then further refined by qualitative assessment to rank our towns and villages on the basis of 5 categories of accessibility and 6 categories of self sufficiency. At page 73 of BP1 we set out in tabular form the settlement criteria used in assessment and at pages 74 - 80 what this means in terms of classification for settlements within Wealden. This reflects also the role of larger settlements beyond Wealden's boundaries e.g. Tunbridge Wells, Eastbourne. Appendix D of BP1 (pages 81-85 inc) sets out a detailed matrix of facilities for each of the settlements in Wealden. This was developed with information provided by our Town and Parish Councils in order to provide the best and most up to date evidence for finalising the settlement hierarchy for the core strategy.

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2.4 Our published sustainability appraisal of the Core Strategy (BP10) at pages 56 -61 show the results of this assessment for our settlements when assessed against social, environmental and economic criteria to give a sustainability hierarchy scoring that sites alongside the settlement hierarchy scoring. At pages 88-94 we indicate which type of centre any particular settlement falls within and why. Appendix 4 of the BP (pages 95-98) shows a detailed matrix of facilities within each based upon the latest and best information supplied to the Council at that time by the Town and Parish Councils.

2.5 We consider that the approach detailed in these documents namely the five identified accessibility criteria and the eight categories of settlement self sufficiency (BP10 page 86) together inventory of facilities provides good justification through our evidence base for the classification of individual settlements.

2.6 Within the background papers supporting the sustainability appraisal of the core strategy (submission document A3) we set out at pages 35 -90 the sustainability appraisal of the Rural Settlement Hierarchy for those rural settlements in the south of the District and at pages 91 -179 for those rural settlements in the north. This detailed evidence further supports the position of individual settlements within the hierarchy.

C) Is it appropriate for the Core Strategy to indicate the overall scale of new housing allocations in individual villages and, if so, is the level of provision justified and deliverable?

3.1 A significant broad element of developing the core strategy has been to consult upon the relative proportions of growth that should be directed to the towns as opposed to the villages. This has been guided by the clear requirement within the Regional Strategy to seek to accommodate the bulk of the growth in the form of sustainable urban extensions.

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3.2 As set out in responses to the exploratory meeting whilst a number of Wealden's villages have SHLAA suitable land available a significant number of these settlements are constrained by matters affected by the Habitats Regulations (both in terms of nitrogen deposition in the north and waste water in the south) and also by flood risk, AONB or National Park designations. In this respect whilst a number of the individual village allocations may, of themselves, appear small scale, the Authorities consider it important to identify where and in what quantum settlements may grow in order to achieve an overall rural/urban split as well as our managing to accommodate overall levels of growth. Use of the SHLAA in this way has also enabled us to be confident on the delivery side .We would also point out that the scale of growth shown e.g. at 20 units is significant for a number of our smaller settlements.

3.3 The Strategy's overarching approach to the promotion of sustainable development, with evidence from and linked to the development work on our settlement hierarchy also supports this approach. This is set out at paragraph 3.11 of the core strategy itself and embodied within our Strategic Planning Objectives SPO7 and SPO8. Background Paper BP1 confirms at page 61 that there is limited scope for the development of our sustainable villages and that we have used a combination of our settlement hierarchy work and assessment of rural housing potential to provide greater clarity for the overall spatial vision.

3.4 An important part of this process has also been the widespread consultation with our parishes and their own aspirations for change. Where possible, and where supported by the technical evidence available to us, we have sought to broadly match our indicated growth for the villages with the choices and preferences expressed to us by the Parish and Town Councils in their response to the 2009 spatial development Options consultation (Appendix 1 of BP1). We believe that it is appropriate to show this level of village growth in this way to achieve certainty of delivery of the overall housing growth set out within the CS and to guide future DPD work for the smaller settlements. Further it is felt important to identify this rural urban split in order to show how we intend to meet our overall vision for the CS through the sustainable growth of a number of our villages and the Spatial Planning Objectives as set out at SPO3 and SPO8 of the strategy.

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D) Has the approach to development boundaries in some villages been justified by the evidence base ?

4.1 In 2007 our Issues and Options consultation (pages 34 -51) Part 4: Wealden's Settlement Pattern set out the particular issues facing the District in light of its pattern of dispersed settlements. At Sections 4.1-4.8 we identified the benefits and possibilities for retention and redrafting of settlement boundaries. We confirmed at paragraph 4.7 that the methodology by which settlements have settlement boundaries needs to be consistent and also required to be reviewed. The consultation asked a number of specific questions on the matter(page 36, questions 5a-5c refer).

4.2 In seeking to adopt an approach of focussing development within the more sustainable villages as required by Strategic Planning Objectives SPO7 and especially SP08 we have used a combination of our settlement hierarchy work, together with local consultation responses referred to above to allocate rural growth. As part of the development of our strategy we took the opportunity of accepting a critical friend review of our document from the then regional body GOSE and also the Planning Inspectorate (PINS) Previous advice from PINS advised that in instances where settlements which previously had development boundaries were not seen as sustainable settlements for growth then the Development Boundaries should be considered for deletion within Core Strategies. Since, within any DB the broad principle of development is acceptable and the Planning Authorities could not, in a Policy sense, seek to arbitrarily limit the amount of growth to the very low levels indicated by some Parishes as supportable (in one case to "c 1-2 units per year") we support this approach. Within BP1, pages 67-68 we have set out at paragraphs 8.62 - 8.64 of the development of the strategy our approach to the use of Development Boundaries and the reasons for the removal of some Development Boundaries as set out in Policy WCS6. This reflects the agreed approach to sustainable development and advice received regarding continued use of development boundaries within our emerging core strategy.

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4.3 We believe from the extensive work and consultation upon the development of our settlement hierarchy methodology and matrix of facilities as referred to above that this approach is justified. Some concerns have been received from some Parishes whose settlements will lose the development boundary and fears that this will make affordable housing in particular even more difficult to achieve. We consider that such concerns can however be met through use of the rural exception affordable housing policy (WCS9) and also through the various initiatives arising from the Localism Act e.g. Neighbourhood Plans and Community Right to Build. This approach is clearly encouraged within paragraph 7.17 of the strategy and yet, in the Authorities view, will not undermine the broader objectives regarding promotion and encouragement of sustainable development primarily in those settlements with greater accessibility and a wider range of services .

4.4 One such village which would no-longer have a development boundary is East Dean. This settlement now falls within the newly designated National Park which would support the removal of a development boundary, however, the National parks Circular clearly states that NPAs should “pro-actively respond to local housing needs” and that “new housing will be focussed on meeting affordable housing requirements”. (para. 78, 2010 circular).