Matter 6 /WDC

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

Core Strategy Hearing

Matter 6:Uckfield 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 6 : Uckfield 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 a number of possible spatial objectives for Uckfield which was a town flagged for growth within the Regional Strategy. These were shown in map and tabular form in the 2007 consultation .Part 5 of the document set out our approach and para 5.4 explained why certain broad search areas had been included or excluded at this stage. In looking at the potential priorities and options for each town we set down a brief description of the town together with a series of possible spatial objectives for Uckfield (p 69 of the document). By Figure 17 and Table 5 of that document and in pages 71-75 the main options and alternatives for development in and around Uckfield were considered.

1.2 For each of the eight 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. As Uckfield had been identified for growth within the RS we set out at paragraph 5.6 how a long list of potential search areas had been identified for initial consultation. Consultation questions were asked in respect of each of these eight possible areas for growth, as identified in the 2007 consultation, together with a further set of questions which also asked whether there was agreement with the broad objectives for the town and if 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 Spatial Development Options Consultation (documents reference D1-D7). These Options were also subject to Sustainability Appraisal which was published for consultation at the same time as the Spatial Development Options Consultation in 2009. 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.

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

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 in Wealden 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. BP8 sets out a summary of consultation and participation in developing our strategy and from which it can be seen that engagement both with the Town Councils and the LSP was an integral part of this process.

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.

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 8.2 - 8.16 of BP1 deal specifically with Uckfield and figure 1 on page 52 of BP1 shows the broad locations considered and consulted upon. We consider that reasonable alternatives to the Strategy now chosen have been considered.

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

2.1 There is some overlap with the audit trail set out in response to the previous question regarding consideration of broad alternatives for growth in Uckfield and of proposed strategy for the town which details how that strategy for Uckfield and the selected choice of strategic development area SDA1 was arrived at.

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

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 the emerging town masterplan. Uckfield has produced its own town masterplan for the town centre and production of this has been supported by the District Council both financially and through officer advice and support. 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. Background Paper 7 (BP7) section 7, paragraphs 7.1 -7.16 details some of the main elements of the masterplan for the town and the links with the LDF/Core Strategy process.

2.3 This work has helped to identify Town Objectives which have then 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 specifically to Uckfield and the 6 identified objectives for the town.

2.4 The submitted Sustainability Appraisal for the Core Strategy, Background Paper 10 also helps in showing both how and why the given strategy is arrived at. It details from page 40, paragraph 5.7 of the document the objectives for each of the Towns, objectives arrived at following widespread consultation and building upon the 2007 work. We then list each of the principal Objectives for each of the Towns and explain how these have helped shape and inform the strategies for each of the Strategies for the Towns which appear in the Core Strategy itself. Paragraph 5.7 sets out those six objectives for Uckfield. At Figure 8.1 we set out the broad locations for development being considered for the town of Uckfield and a detailed commentary on these when assessed against the Councils 22 approved sustainability objectives. These are set out for Uckfield, and indeed for all of the towns, as assessed against social, environmental and economic objectives. Pages 72-76 of BP10 refer to the assessment of broad locations for Uckfield.

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

2.5 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 Uckfield this is set out at pages 101-102 of BP10 (table 8.10). The SA process, which has been integral to the development of the Core strategy also sets out 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 SDA1 identified for growth of Uckfield.

2.6 The background papers supporting the SA of the Core Strategy set out in specific detail (document reference A3, SA background paper 5 - page 193) the sustainability appraisal of the broad locations for the development of each of the towns. Appendix 1 of this background paper, at pages 207-212 shows the broad locations for growth considered whilst Appendix 2 Matrix tables "Full assessment of broad locations" (pages 213 - 237)shows the full assessment of broad locations for the towns. This detailed work further supports why the preferred strategy and choice of strategic development areas has been arrived at.

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 their various interests and responsibilities there are two submitted background papers BP11 and BP11 "proposed changes".

3.2 Within BP11 at page 32, Table 2, we set out in tabular form any key or critical infrastructure requirements to support the growth identified for Uckfield at Strategic Development Area SDA1. Whilst each of the various possible infrastructure matters associated with development are set down in the table there are identified critical capacity issues predicted for nature conservation & biodiversity, transport and education (all phases).

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

3.3 For waste, or waste water, and health emergency services and flood protection whilst other needs are identified no particular critical issues are identified .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. This information will come forward as part of the work we are undertaking on our strategic sites DPD.

3.4 The infrastructure requirements have clearly been identified. Appendix A of our IDP (pages 57 -77) sets out the responsible agency for each type of infrastructure funding arrangements, costs (where known) status of schemes, risks and lead agency for delivery. The IDP itself and the tables within it have been compiled and updated on the basis of close consultation with each of 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.

3.5 In respect of Uckfield there are currently no changes needed in respect of the IDP Table 1 (BP 11 Infrastructure Delivery Plan - proposed changes) however work is progressing well with ESCC on the implementation, after consultation, on necessary traffic management measures and interventions within Uckfield to accommodate existing and proposed growth. In conclusion we therefore consider that the infrastructure implications for SD1 have been clearly identified, are supported by the evidence base, and the responsibility for any provision of infrastructure made clear.

D) Is the strategy sufficiently flexible to respond to an unexpected change in circumstances?

4.1 Yes. Firstly the amount of SHLAA suitable land within the SDA exceeds the capacity to deliver the amount of growth identified in the CS (1000 units). This level is identified as that which can be accommodated without breaching Habitats Regulations. We are aware from discussions with landowners and agents affected that they are aware of the requirement for mitigation under the HR and that sufficient land is also available to allow for the provision of any necessary SANG provision. The further work which we have already commenced on publication for consultation of our strategic sites development document (SSDPD), including through SA work, shows that there is considerable flexibility in delivering this level of growth.

4.2 Landowners and their agents acting in respect of SDA1 have already held meetings with Natural England to ascertain SANG requirements and built this into their plans.

4.3 Discussions with ESCC have also confirmed that there is no objection in principle to the provision of necessary access (including a primary access from the existing Uckfield by pass) to develop this land. Delivery on this large site is proposed to be phased throughout the period of the plan but review of exactly how this can take place is part of the development management process regarding phasing.

4.4 Our SHLAA evidence confirms the viability of this large greenfield site and we are confident that, as a site in a single ownership and with agents who are already in active discussions that this can be delivered. Within the core strategy itself we acknowledge that this quantum of growth at Uckfield is important to delivery of our overall strategy and that this is subject to the provision of a suitable access and a number of other factors to be addressed through the SSDPD. In this regard we confirm that if delivery has not commenced on the land identified at SDA1 by 2016 that this would trigger a partial review of the strategy. This would be identified through our AMR process and by looking, as appropriate at other SHLAA suitable sites. However we currently have no evidence to suggest that this SDA will not prove deliverable within this timescale and every affirmation from those involved that it will be.

E) Is there sufficiently clear guidance on retail floorspace provision in Uckfield ?

5.1 From the key evidence on capacity, need and demand for retail floorspace provision within Wealden's towns we ascertained that the towns of Uckfield and Hailsham were capable, together with the level of growth being considered, of supporting additional retail floorspace provision. Additional work carried out to refine and clarify this probable level of capacity/need within the town was completed in 2010. Both of these studies are detailed below and form part of our evidence base.

Wealden District Council Interim Shopping Study 2008, Volume 1, October 2008

Wealden District Council Shopping Study 2008, Addendum Report on Quantitative Need Arising From Proposed Housing Development Options, April 2010

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

5.2 Further to these studies new retail allocations of some 10,707 sq metres of retail floorspace has been identified for Uckfield within the core strategy. We consider that ongoing work with the Town Council on the Uckfield masterplan, coupled with use of saved policies from the non statutory plan in respect of Uckfield Town Centre provide appropriate guidance. Tescos have formally made representations to the submitted Core strategy under Regulation 27. The company has clearly previously identified their wish to expand within the town and also to work to help achieve the objectives of the UTC approved masterplan.

5.3 The provision of enhanced retail provision to support the town will be expected to be within the town/town centre in order to assist in meeting the objectives for the town of Uckfield as set out in BP10 (page 41, objective 4 *"to increase retail floorspace and support significant improvement of the town centre public realm taking into account local environmental assets including the local green network"*. We consider that the level of guidance at this stage is appropriate for the core strategy. Further guidance may be provided through future DPDs and/or the NPPF however we consider that the core strategy provides appropriate guidance on this matter. Broad locations for both retail and employment provision within Uckfield are shown on the key diagram and also opposite page 74 within the document and also in Figure 6 "Uckfield Area Strategy" (page 38).

F) Is SDA1 justified and deliverable ?

6.1 Yes. We have set out above at answers to a-c of Matter 6 how and why we have arrived at the choice of SDA1 to deliver growth within Uckfield. We believe it to be the most suitable, sustainable and reasonable option when considered against the reasonable alternatives originally consulted upon in 2007 and subsequently refined through consultation, evidence testing and sustainability assessment.

6.2 For the reasons set out in our response to D) above we consider the SDA to be deliverable within the timescale identified in our core strategy.

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

G) Have reasonable alternatives to SD1 been considered - omission sites ?

7.1 Yes. We have set out in detail and in responding to how and why we have arrived at our strategy the considerable work that has gone into consideration of all reasonable alternative options. This is exemplified by the identification, as far back as the 2007 consultation of the range of reasonable possible alternative broad areas of search for growth and individual sites within them.

7.2 Our SHLAA yielded a lot of potential around the town - maybe not surprisingly as not only was Uckfield identified for growth with the RS but some land subject of these 2007" main options and alternatives for development in and around the town" (please refer to Figure 17, page 70 of the 2007 document) have fairly recently been the subject of conjoined appeals. Overall assessment of these locations against a range of agreed sustainability objectives was set out in the SA pages 71-75 (Table 8.3) and considered on the basis of this assessment.

7.3 Through our 2007 consultation, SHLAA exercise and our SA work the potential suitability of these sites, as possible reasonable alternatives have therefore been considered as part and parcel of developing our strategy. Subsequently, through our sustainability assessment of six broad identified options in respect of "SHLAA suitable" land we set out why SDA1 has been selected and others not taken forward (pages 101-102 Table 8.10 of BP 10 refers).