Matter 8: Polegate and Willingdon and Stone Cross Area Strategy

a) Have reasonable alternatives to the strategy been considered?

1. It is considered that the proposed strategy for Polegate, Willingdon and Stones Cross is appropriate and that the areas identified are suitable locations for development within the district. A number of areas were considered for development within the Issues and Options consultation document in July 2007 and assessed by the Sustainability Appraisal and it is considered that these represented reasonable alternatives for the strategy for the area and demonstrated the suitability of the locations chosen.

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

2. Figure 2.1 in Background Paper 10 "Summary of the Evolution of the Core Strategy Spatial Distribution in Relation to S A" is a graphic summary of the period July 2009 to December 2010. It might be said in that respect to be an 'audit trail' of the Core Strategy process between those dates. It is not, however, by any means a complete description. The Spatial Distribution documents of July 2009 gave no more than a brief overview of six possible approaches to development distribution, although there was public consultation at that stage. Two 'Scenarios' were taken forward for assessment but there is no clear description of them in the background to the process, and in fact committee consideration of them did not provide any clear conclusions. Instead, a further scenario was brought forward.

3. Paragraph 8.40 of Background Paper 10 gives a brief summary of the apparent reasons for rejecting scenarios A and B but there is no evidence base which supports this or evidence that these scenarios could have not been accommodated in the District. Although evidence of the infrastructure issues was identified, possibly restricting the adoption of Scenario A, there is no statistical data or other evidence (other than general unsubstantiated statements) that the council tested Scenario B, i.e. that additional growth should be accommodated in the north.

4. Instead, Scenario C (which forms the basis of the Core Strategy) was briefly described and agreed, and was subsequently published as the Submission Document, on which there had been no prior consultation.

5. That notwithstanding, however, it is considered that a clear audit trail is apparent subsequent to the adoption of Scenario C insofar as the spatial alternatives for Polegate, Willingdon and Stone Cross are concerned and it has been clearly demonstrated why the broad locations of development for this area have been chosen. Within the Issues and Options consultation paper in July 2007 a number of broad areas in were identified, within the Spatial Development Options consultation document in July 2009 Polegate and Willingdon is identified as a district wide location for development and within the Sustainability Appraisal the assessment of the available options is clear and the preferred location for development in the area is identified. It is however unclear in relation to Polegate why the broad location to the north was not carried forward into the Core Strategy even though it has been stated in the SA that this area has been selected.

6. It is also unclear why Stone Cross is considered to be a service centre and not a district centre within the settlement hierarchy given the proposed development of almost 700 dwellings in this location and the importance that it has therefore been afforded. Given the level of development proposed it is not considered that the evidence base or the Core Strategy has sufficiently demonstrated why it has been described as a service centre within the hierarchy

7. It is therefore considered that whilst the strategy for Polegate, WIllingdon and Stone Cross can be traced through the various consultations documents it is not clear why the final proposed strategy deviated from broad locations selected within the SA.

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?

8. With regard the development strategy for Polegate, Willingdon and Stone Cross it is considered that the main infrastructure implications have been identified however it is not clear in the Infrastructure Delivery Plan who is going to deliver the required infrastructure and by when. In

relation to transport infrastructure, a number of critical improvements and capacity issues are identified however within Appendix A of Background Paper 11 there is no detail on costs or timing and it is stated that the implementation of the schemes are critical to allow the development of 700 dwellings in land south of Polegate and east of Willingdon. Given the importance and impact that timely infrastructure provision will have on bringing development forward in this location it is therefore considered that further information is required and needs to be incorporated to provide greater clarity on the provision of this infrastructure which is key to the development of Polegate, Willingdon and Stone Cross.

d) Has the impact of the strategy on the Strategic Road Network been adequately assessed and is there a reasonable prospect that the transport infrastructure required is deliverable?

9. The South Wealden and Eastbourne Transport Study (SWETS) indicates the proposed impact of the strategy on the Strategic Road Network and has identified a number of issues and improvements that will need to be made to ensure that the strategy is deliverable. The Infrastructure Delivery Plan also identifies the critical infrastructure requirements and details the transport improvements that are required to bring the development for the area forward. It is not however considered that there is sufficient detail on the manner in which the improvements will come forward or sufficient clarity on timing. Appendix A of the Infrastructure Delivery Plan indicates that two of the schemes relating to the Strategic Road Network are essential to the development in south Wealden however there is no detail on cost or timing and schemes are still at concept stage. It is therefore not known whether there is a reasonable prospect that the infrastructure required is deliverable and this need further clarification to ensure that the strategy is sound. The strategy is therefore unsound as it has not be justified or demonstrated by the evidence base that the transport infrastructure is deliverable.

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

10. The strategy for Polegate, Willingdon and Stone Cross proposes a number of sites for development and these will form urban extensions to the existing built up areas. The allocation of the broad development areas are considered to provide an element of flexibility for development as

they incorporate a significant area of land that can be developed in line with infrastructure provision. It is however considered that the council should keep the strategic locations identified as broad as possible to support flexibility of the strategy and they should take into account land that may become available in the future. Whilst the SHLAA demonstrates that land is available to meet the aims of the proposed strategy for Polegate, Willingdon and Stone Cross, it needs to be taken into account that more land than is detailed in the SHLAA is available and parcels of land should not be discounted just because they have not yet been put forward. In order to properly plan and develop the area, all suitable areas should be taken into account and this will ensure flexibility is built into the strategy for the area.

11. Whilst it is considered that the inclusion of the broad areas for development introduces a level of flexibility for the development of Polegate, Willingdon and Stone Cross, it is not considered that the overall strategy for the district is sufficiently flexible due to the issues regarding infrastructure provision and the uncertainty of funding. Without clarity on the provision of infrastructure which will affect the development of strategic sites within the district it is believed that the overall strategy is inherently inflexible and will not be able to respond adequately to any unexpected changes in circumstance which may affect infrastructure provision which underpins the delivery of the whole strategy.

f - i) Is SD4/SD5/SD6/SD7 justified and deliverable?

12. It is considered that the strategic development areas are justified and have been adequately assessed by the Sustainability Appraisal as being a suitable locations for development when assessed and compared to all other reasonable alternatives. In terms of deliverability the SHLAA has identified land that is suitable for development and that can be achieved and delivered. This however needs to be considered in conjunction to the Infrastructure Delivery Plan and the infrastructure that is required in order to develop SD4. Therefore whilst it is considered that SD4 can be delivered, further clarity and detail is needed in the Core Strategy in relation to how and when infrastructure will come forward as this is key to ensuring that the development in this location can be bought forward in the form the strategy proposes.

13. It is also considered that the current broad strategic locations for development shown in the Core Strategy are maintained to ensure that they retains as much flexibility as possible and utilize all suitable and available land that has been identified in this location.

j) Is there appropriate justification for the phasing of housing at SD4 from 2019?

14. No, it is unclear from the Core Strategy submission document or background papers how the phasing of housing has been derived. Whilst it is recognised that the council is required to have a steady supply of housing land over the plan period, it is not understood from the Core Strategy why the sites have been phased in the manner proposed or any discussion of how this will contribute to meeting the aims of the strategy for each area. It is recognised within Background Paper 3 that in terms of the number of people on the Councils Housing Register, Polegate has the second highest proportion of any area within the district with 201 households on the register. Economic issues also need to be addressed and it is stated that the unemployment rates for Polegate are above the District wide level, and that Polegate also has the highest proportion of the main towns of people with no qualifications. Housing growth in Polegate is therefore required to meet acute housing needs as well as housing required to support the local economy.

15. On this basis it is not fully understood why housing development is not going to come forward until 2019 which is considered to be detrimental to achieving the aims and objectives of the Core Strategy vision and to addressing the issues within Polegate. One aspect that is likely to affect phasing is infrastructure provision yet it is not clear how this has affected the proposed phasing for Polegate and the Infrastructure Delivery Plan does not elaborate on timing for key infrastructure such as transport and waste water. It is therefore not understood why development begins in Polegate post 2019 and why this strategy has been adopted within the Core Strategy.

h) Have reasonable alternatives to SD4, SD5, SD6 and SD7 been considered – omission sites?

16. It is considered that the reasonable alternative sites within Polegate, Willingdon and Stone Cross have been considered and this is evident in the Issues and Options document in July 2007 and

also the Sustainability Appraisal which has assessed the strategic development options and also the omission sites.

Conclusion

17. Whilst it is considered that the development strategy proposed for Polegate, Willingdon and Stone Cross is appropriate and reasonable alternatives for this area have been considered, it is considered that a number of issues render the strategy unsound. This includes the lack of detail on the infrastructure implications and who is going to deliver the infrastructure required which have not been justified by the evidence base. Infrastructure provision also effects the flexibility of the strategy, which although the strategic sites for Polegate, Willingdon and Stone Cross are deemed to include an element of flexibility, the uncertainty of infrastructure provision means that the strategy is inherently inflexible and therefore not effective. The phasing of development is also not appropriately justified and therefore makes the plan unsound in terms of deliverability.