WEALDEN DISTRICT COUNCIL
LOCAL DEVELOPMENT FRAMEWORK

Examination into the Wealden District (Incorporating Part of the South Downs National Park) Core Strategy Development Plan Document

MATTER 8: Polegate and Willingdon and Stone Cross Area Strategy

Hearing Session 24 January 2012

RYDON HOMES LTD
PARTICIPANTS RESPONSE
Identification Number: 534595

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Rydon
RydonHomes.co.uk

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1.0 INTRODUCTION

1.1 Rydon Homes Ltd is a local firm of housebuilders based in East Grinstead. It is part of the Rydon Group which is a construction, development, maintenance, investment and management group operating throughout Southern England. Rydon Homes builds at the quality end of the market, mainly in Kent, Surrey and East and West Sussex. Rydon currently holds land interests that it is promoting in south-east Crowborough and Stone Cross.

1.2 Mrs Heidi Kelly BA (Hons) Dip UP MRTPI is a Chartered Town Planner and a Strategic Land Manager for Rydon Homes Ltd dealing with the identification, acquisition and promotion of strategic land across the south-east of England. Heidi has worked for private residential developers since graduating 15 years ago, 13 years of which have been for Rydon Homes. During that time Rydon has been involved in the promotion of sites in Wealden District, successfully securing four housing allocations in the last (non-statutory) Local Plan.

2.0 SCOPE OF REPRESENTATION

2.1 Rydon has land interests in both the northern and southern parts of the district. The representations in response to the issues raised in Matter 8 are made in relation to SD6: Land at East and South East of Stone Cross contained in Policy WCS4 of Wealden District Council's (WDC) Core Strategy.

2.2 Rydon believes that SD6 in Policy WCS4 meets the tests of soundness in terms of being justified, effective and consistent with national policy. Therefore, these representations are supportive of this element of the policy. The comments offered as part of this statement are to assist the

Inspector's understanding of the deliverability of the Council's strategy for the Stone Cross area.

3.0 MATTER 8 a)

Have reasonable alternatives to the strategy been considered?

3.1 Rydon believes that reasonable alternatives to the strategy in relation to Polegate, Willingdon and Stone Cross have been considered in the context of the proposed housing target.

3.2 However, if following consideration of the issues discussed in relation to Matter 3 the Inspector concludes that the housing requirement needs to be increased, there could be potential to accommodate further housing numbers than currently proposed under Policy WCS2. This is discussed in more detail in response to question 8 k) at paragraph 13.2.

4.0 MATTER 8 b)

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

4.1 Rydon does not wish to offer a response on this question.

5.0 MATTER 8 c)

Have the infrastructure implications of the strategy clearly been identified and supported in the evidence base? Is it clear who is going to deliver the required infrastructure and by when?

5.1 Rydon does not have a view about the overall infrastructure position and leaves this to other participants to investigate.

5.2 However, in the case of Stone Cross the existing infrastructure position has been established and the strategy for growth in this location has been planned accordingly. Where capacity in infrastructure is at its limit, such as the Hailsham South Waste Water Treatment Works, the scale of development proposed is restricted to the remaining available headroom. Where improvements can be made to other elements of infrastructure, such as education, in order to deliver the Council's strategy the various development sites are required to contribute accordingly. This approach taken at Stone Cross satisfies the tests of soundness.

5.3 The existing infrastructure in Stone Cross is capable of accommodating growth and any shortfall in provision can be mitigated through the proposed development.

5.4 The evidence base shows that there is sufficient capacity in local infrastructure to accommodate the release of planned housing sites at Stone Cross early in the plan period in line with the phasing plan contained in Figure 5 of the Core Strategy. As other sites come forward later in the plan period development can seek to address infrastructure issues as they arise.

6.0 MATTER 8 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?

6.1 Rydon does not have enough information to reach a properly informed view on the wider Strategic Road Network in order to make a meaningful contribution to discussion on the matter.

6.2 However, Rydon has satisfied itself through its own site investigations that early delivery of land within SD6 in the short term is possible with minimal alterations to the existing network.

6.3 The SWETS Study recommends an appropriate package of measures to mitigate the scale of development proposed. It is for East Sussex County Council as Highway Authority and other stakeholders to demonstrate how the impact of necessary growth should be resolved and funded. This can of course include developer contributions and should not prevent the flow of sites coming forward.

7.0 MATTER 8 e)

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

7.1 Rydon does not wish to offer a response on this question.

8.0 MATTER 8 f)

Is SD4 justified and deliverable?

8.1 Rydon does not wish to offer a response on this question.

9.0 MATTER 8 g)
Is SD5 justified and deliverable?

9.1 Rydon does not wish to offer a response on this question.

10.0 MATTER 8 h)
Is SD6 justified and deliverable?

10.1 Rydon Homes has land interests to the south of Rattle Road, Stone Cross, within SD6. The site is considered suitable, available and achievable in the Council's Strategic Housing Land Availability Assessment (SHLAA), along with a number of other sites that fall within SD6.

10.2 During the consultation period on the Proposed Submission Core Strategy fairly limited representations were lodged on the principle of development at Stone Cross in general. No significant opposition was raised to Strategic Development Area SD6 and extremely limited specific reference was made to the inclusion of the area of land south of Rattle Road/north of the railway line.

10.3 Rydon can confirm that this site is immediately deliverable. Following consultation with the Parish Council and local community, a planning application for the development of 120 dwellings, a community facility and open space was submitted in October 2011. A decision is awaited at the time of writing this statement. The preparation of this planning application was prompted by the Council's own report to the planning committee in December 2010 on Wates's planning application for the development of 38 dwellings off Penrith Way, Langney, which also falls within SD6. The Council approved the application on the grounds that it was appropriate in order to bring on stream housing completions at the

rate anticipated in the (draft) Core Strategy. Rydon supports this approach and felt it was appropriate to make its own application in order to achieve the same objective.

10.4 The Core Strategy suggests in the supporting text at paragraph 6.31 that SD6 could deliver around an additional 220 dwellings within the plan period. It also suggests that SD7: Land North of Stone Cross could deliver 430 dwellings. The Council has allowed for a degree of flexibility between these two locations and this is welcomed as a sound approach to delivering an effective strategy. Rydon believes that there are more suitable sites available within SD6 than within SD7.

10.5 WDC has produced its draft Strategic Sites Development Plan Document (SS DPD) which is due for consultation in January 2012. Following further analysis of available of sites within SD6 and SD7 the Council has shown a much higher proportion of the overall 650 dwellings allocated to Stone Cross as being within the SD6 options, illustrating the belief that there are more suitable sites in SD6. The Core Strategy should be amended to reflect the greater availability of suitable sites and reliance on SD6 to ensure consistency between DPDs.

10.6 The SS DPD identifies four different options containing combinations of sites within SD6. The Rydon site south of Rattle Road is shown in all four options, supporting the recognition that this is a suitable and deliverable site which can come forward in the short-term assisting in meeting the Council's housing trajectory.

11.0 MATTER 8 i)

Is SD7 justified and deliverable?

11.1 Rydon does not wish to offer a response on this question.

12.0 MATTER 8 j)

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

12.1 Rydon does not wish to offer a response on this question.

13.0 MATTER 8 k)

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

13.1 In terms of consideration of alternative locations to the Strategic Development Areas SD6 and SD7, the Council has given the widest possible consideration to all alternatives as the entire periphery of Stone Cross has been assessed. Only the south-western edge of the settlement area has been excluded from a Strategic Development Area due to inaccessibility.

13.2 However, if the Inspector is considering alternative ways to deliver higher housing numbers in the south of the district there may be the potential to increase the amount of housing at Stone Cross without compromising the infrastructure position. The planned growth of 650 dwellings across two Strategic Development Areas at Stone Cross is based on working within the capacity constraint at the Hailsham South WWTW. Therefore, this assumes that all 650 dwellings will drain to the Hailsham WWTW and use up the available headroom. There is sufficient land within SD7 and SD6 north of the railway line to deliver the full 650 dwellings. That leaves the area of SD6 south of the railway line which is believed to drain to Eastbourne WWTW. If it can be demonstrated that there is not a capacity issue at the Eastbourne WWTW, additional dwellings in excess of the proposed 650 dwellings, in the region of 250 dwellings, could be allocated to this area (as

indicated for Site A in Figure 13: Option Three in WDC's draft SS DPD Issues & Options Consultation document November 2011). The housing requirement for Stone Cross could be increased to 900 dwellings overall without exceeding the WWTW capacity and this would go some way towards increasing the overall housing target if the Inspector is minded to revise the level of housing to be provided.