Matter 8 /WDC

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

Core Strategy Hearing

Matter 8: Polegate, Willingdon and Stone Cross 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 8: Polegate and Willingdon and Stone Cross Area Strategy

A) Have reasonable alternatives to the strategy been considered?

1.1 The Council's Issues and Options consultation of 2007 consulted upon a number of possible spatial objectives for Polegate and Willingdon, as shown on page 85 (reference D1), and a rural settlement strategy, including Stone Cross (reference D1, page 41 to 47). Part 4 (pages 48 to 49) sets out the spatial distribution options between settlements within the Sussex Coast Sub Region. Part 5 of the document sets out our approach to Polegate and Willingdon and paragraphs 5.34 - 5.36 explain the opportunities and constraints. Figure 19 and Table 7 of that document (pages 86 - 90) identify the main options and alternatives for development in and around Polegate, Willingdon and Stone Cross with a summary of impacts and issues to aid the consideration of the alternative locations for growth. Consultation questions were asked in respect of these possible areas for growth together with a further questions which 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.

1.2 A detailed analysis of the responses to the consultation were undertaken, and reported to the Local Development Framework Sub Committee on 15th October 2007 (reference A8). 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. Background Paper 8 (reference A6) sets out a summary of consultation and participation in developing our strategy.

1.3 Background Paper 3: Development of the Strategic Housing Options (reference C8) details the development of the six housing options which were subject to consultation in 2009. This paper shows a number of iterations of the options that were considered and the process by which they were developed.

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1.4 Six alternative distributions of housing growth were published for consultation as part of the Spatial Development Options Consultation (reference C1), with varying amounts of growth attributed to the areas. The housing growth in Polegate and Willingdon ranged from 315 dwellings, 675 dwellings, 1635 dwellings, 1420 dwellings, 1355 dwellings and 2215 dwellings. A range for the parish of Westham (including the settlements of Stone Cross and Westham) were also provided; three scenarios ranged from 201-500 dwellings, with a lower range of 201-300 and ranges of 351-415 and 301 -500. A number of employment scenarios were also published.

1.5 Following the consultation and consideration of the responses by the Local Development Framework Sub Committee it was agreed to test and model growth options with key infrastructure providers based on the South East Plan and the conclusions drawn from the consultation responses (reference A11). As a result two different distributions for growth (known as Scenario A and B) were tested as shown in the Sustainability Appraisal Background Papers (reference A3, page 180) of 850 dwellings in the Polegate area and 750 dwellings in Stone Cross. The process of testing included SWETS Phase 1 (reference N1 and reference A11, paragraph 29) as well as considering deliverability (reference A11, paragraphs 13, 17, 26 and 31).

1.6 The distributions for Polegate, Willingdon and Stone Cross sought to meet the South East Plan requirements to create mixed use sustainable urban extensions as well as deliver the objectives raised at the Issues and Options Consultation, the town objectives (Sustainability Appraisal Report, pages 40 to 42) and the Polegate Town Masterplan (summarised in Background Paper A23, pages 15 to 17). The scenarios also took into account the rural settlement hierarchy with regards to Stone Cross (Background Paper 1: Development of the Core Strategy, reference A17, Appendix 3 and 4).

1.7 The alternative strategy for growth within Polegate, Willingdon and Stone Cross, was developed in the context of all settlements within the Sussex Coast Sub Region. The town objectives provide the basis for the strategy including: the need to meet the objectives of Hailsham; the need to retain Polegate as a service centre whilst acknowledging the function of Eastbourne as the main service provider; the need to provide market and affordable housing to help meet economic and social needs and provide employment opportunities.

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1.8 From the consideration of the two housing scenarios, together with all the evidence base, including the referred to inability to further increase the headroom for the number of dwellings to be connected to Hailsham North and Hailsham South Waste Water Treatment works the preferred strategy was created and tested, taking into account all the needs of South Wealden.

1.9 The Issues and Options identification of Broad Locations, assisted in bringing forward sites to be considered under SHLAA. The sites assessed as being suitable, available and achievable were grouped into broad locations. These broad locations were then subject to a Sustainability Appraisal by assessing each location against the 22 Sustainability Appraisal Objectives, with a resulting comparative analysis against each other. The Sustainability Appraisal is contained within SA Background Paper 5 (reference A3, pages 200 - 203 and 228 - 233). The broad locations were then accepted or rejected as shown in the Sustainability Appraisal Report (reference A2, Table 8.10).

1.10 Therefore it is considered that reasonable alternatives were considered, based on the factual and participative evidence base.

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

2.1 There is a clear audit trail between the Issues and Option Consultation in 2007, the Spatial Development Options Consultation in 2009 and the preferred Strategy. The Sustainability Appraisal Report (A2, paragraph 4.2) provides a comprehensive audit trail of the approach taken to produce the preferred strategy.

2.2 The Issues and Options Consultation in 2007 outlined suggested objectives for the area (reference D1, page 85), and a rural settlement strategy including Stone Cross (reference D1, pages 41 to 47). The objectives for Polegate and Willingdon were incorporated into Town Objectives which are contained within the Sustainability Appraisal Report (A2, page 41). These objectives are derived from: the Polegate Town Plan (Background Paper 7, reference A23 pages 15 to 17); the Wealden Profile (reference C6); other factual evidence bases; and the consultation responses to the Spatial Development Options (summarised in Background Paper 1 A17, paragraph 6.2). The Town Objectives were subject to Sustainability Appraisal as shown in SA Background Paper 2 SA of Plan Objectives (reference A3). These objectives have a direct impact on the strategy for Polegate and Willingdon, as it seeks to address the objectives.

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2.3 The rural settlement strategy has undergone a number of iterations, and has shaped the strategy for Stone Cross. After initial consultation in 2007 the settlement strategy was revised for the 2009 Spatial Development Options Consultation and was incorporated within Option 5. The methodology of the settlement strategy is contained within Background Paper 3: Development of the Strategic Housing Options (reference C8, pages 14 to 15). The Options were subject to Sustainability Appraisal and reported in the Sustainability Appraisal Report (reference A2, pages 45 to 51). The LDF Sub Committee considered the responses to the Spatial Development Options Consultation and resolved to include, in the refinement of options, the creation of a sustainable settlement strategy recognising sustainable transport provision (reference A11). As a result the rural settlement hierarchy and strategy was further refined. The methodology and results are provided in Appendix 3 and 4 in Background Paper 1: Development of the Core Strategy (reference A17) and the Sustainability Appraisal is contained within SA Background Paper 3 (reference A3).

2.4 The 2009 Spatial Development Options Consultation clearly outlined the objectives for Wealden, taking into account the consultation responses received in 2007 in relation to Part 8 of the Issues and Options Document (reference D1). The options for housing and employment growth were based upon a number of factors, seeking to achieve the objectives outlined in the 2009 Spatial Development Options Consultation Document (reference C1, pages 11 to 15). Background Paper 3: Development of the Strategic Housing Options provides the basis on which the six housing options were developed and the iterative approach which produced the six housing options. The Spatial Development Options Consultation was supported by a Sustainability Appraisal of Options (reference C3).

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2.5 The consultation responses to the Strategic Development Options, as summarised in Background Paper 1 (A17, paragraph 6.2) lead to the LDF Sub Committee to agree on 16th December 2009 (reference A11) an approach to refine alternatives for the purposes of testing, including the need to follow the distribution set out in the South East Plan. The Sustainability Appraisal Report (A2, pages 47 to 50) summarises the options and mitigation requirements and identifies why options or part of options were rejected or accepted (51 to 52). From this two distributions were formulated, including individual growth scenarios for each town, identified as Scenario A and B. These scenarios were based on town objectives, national and regional policy and the factual evidence base, including SHLAA. These two options are provided in SA Background Paper 4 (reference A3), and were subject to Sustainability Appraisal (page 65 to 71 of the Sustainability Appraisal Report reference A2). The need to comply with the Habitats Directive and the headroom of the waste water treatment works are provided within this document.

2.6 Background Paper 5 (reference A3, pages 200 - 203 and 228 - 233) provides the Sustainability Appraisal of the broad locations. The broad locations were then accepted or rejected as shown in the Sustainability Appraisal Report (reference A2, Table 8.10).

2.7 Background Paper 1: Development of the Core Strategy (reference A17, pages 57 to 61) provides a summary of the Sustainability Appraisal of broad locations and the rationale behind the Strategy for Polegate, Willingdon and Stone Cross.

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 (reference A25), which is a living document and has been compiled with inputs from all relevant infrastructure providers (reference A26).

3.2 Within BP11 (reference A25) at page 38, Table 4, we set out any key or critical infrastructure requirements to support the growth identified for Polegate, Willingdon and Stone Cross. There are identified critical capacity issues predicted for transport, education and waste water. The justified approach to our evidence bases concerning transport in south Wealden and Education have been outlined in Matter 15, and waste water in relation to Matter 14.

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3.3 The District Council has recently resolved to publish its draft Strategic Sites DPD for public consultation under Regulation 25 and where this further work on necessary infrastructure will be developed. 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.

3.4 We therefore consider that the infrastructure implications for Polegate, Willingdon and Stone Cross have been clearly identified, are supported by the evidence base, and the responsibility for any provision of infrastructure made clear.

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?

4.1 It is considered that the extensive modelling work undertaken and shown in the South Wealden and Eastbourne Transport Study, 2010 (reference N1) adequately assesses the strategic growth in both South Wealden and Eastbourne. Such a strategic approach is considered robust, particularly when it takes into account the vehicle movements of Eastbourne and the strategic road network. This study is also up to date, with new modelling completed that takes into account current updates to future projections. This report will be provided in the statement by East Sussex County Council in relation to Matter 15, Infrastructure.

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4.2 A number of the interventions required to mitigate the impact of development are based upon those contained within the Non Statutory Wealden Local Plan. Funds are currently being collected for a number of junction improvements to be delivered on behalf of East Sussex County Council and the Highways Agency. SWETS has provided alternatives to larger schemes, however it is considered that as many of the road improvements involve existing junctions that there is reasonable prospect of delivery. This is ratified by East Sussex County Council in their submission of October 2011 (reference U27, sections 3.2 and 3.3). The design and costing for such improvements is anticipated to be completed by 2012 (U27, paragraph 3.3.2), so that they may be included in the evidence base supporting the CIL Charging Schedule and the Strategic Sites Development Plan Document which is scheduled to be adopted before March 2014, as specified by the revised Local Development Scheme.

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

5.1 The Core Strategy acknowledges that there is a risk to delivery posed by South Wealden transport Infrastructure requirements (reference A1, paragraph 6.32). The development is phased to be delivered 2019/2020 which provides time to develop the infrastructure strategy to minimise risk. In addition this will allow time for negotiations with the developers necessary to minimise risk to delivery.

5.2 In terms of land, however, there is sufficient resource to provide some flexibility through other Development Plan Documents to provide some contingency if delivery becomes uncertain on part of the site.

F) Is SD4 justified and deliverable?

6.1 Strategic Development Area 4 has been justified through the significant evidence base. It has been considered against reasonable alternatives and found the most appropriate in sustainability terms (Sustainabilty Appraisal Report, reference A2, Table 8.7 and Background Paper 1 paragraph 8.34), and is considered suitable available and achievable (SHLAA reference I2 and I3).

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6.2 The evidence base shows that it is deliverable particularly in relation to the South Wealden and Eastbourne Transport Study (reference N1, Phase 3) and land availability. Further work undertaken for the proposed Strategic Sites Development Plan Document Issues and Options Consultation show a number of deliverable options, with associated infrastructure. Many of the concerns raised regarding the development of this area at Regulation 27 area are already addressed through a number of the options set out in this draft consultation document, particularly relating to loss of recreational land, green infrastructure and flood risk.

G) Is SD5 justified and deliverable?

7.1 The strategy for SD5 is justified with positive benefits for Eastbourne and Polegate in terms of employment provision helping to achieve a modest step change in the economy by developing in an area with strong economic links. Further work undertaken for the proposed Strategic Sites Development Plan Document Issues and Options Consultation show a number of deliverable options, with associated infrastructure.

7.2 The SHLAA showed this broad location to be unsuitable for housing purposes, but suitable for employment (reference I2 and I3).

H) Is SD6 justified and deliverable?

8.1 Strategic Development Area 6 has been justified through the significant evidence base. It has been considered against reasonable alternatives and found the most appropriate in sustainability terms (Sustainability Appraisal Report, reference A2, Table 8.6), and is considered suitable available and achievable (SHLAA reference I2 and I3).

8.2 The evidence base shows that the broad location is deliverable particularly in relation to the South Wealden and Eastbourne Transport Study (reference N1) and SHLAA. Further work undertaken for the proposed Strategic Sites Development Plan Document Issues and Options Consultation show a number of deliverable options, with associated infrastructure.

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I) Is SD7 justified and deliverable?

9.1 Strategic Development Area 7 has been justified through the significant evidence base. It has been considered against reasonable alternatives and found the most appropriate in sustainability terms (Sustainability Appraisal Report, reference A2, Table 8.6), and is considered suitable available and achievable (SHLAA reference I2 and I3).

9.2 The evidence base shows that the broad location is deliverable particularly in relation to the South Wealden and Eastbourne Transport Study (reference N1) and SHLAA. Further work undertaken for the proposed Strategic Sites Development Plan Document Issues and Options Consultation show a number of deliverable options, with associated infrastructure.

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

10.1 There are a number of identified transport interventions of a strategic nature identified in relation to SD4 (SWETS reference N1). This is of particular relevance to the strategic trunk road network as well as local interventions which have an impact upon the truck road network. It is considered necessary to back load development as much as possible taking into account delivery rates, on such a large site with a limited number of landowners, to ensure that the infrastructure is delivered in a timely manner with development, as opposed to development being built without the necessary infrastructure being in place. This fully in accordance with CC7 and takes into account the number of interventions required and the strategic nature of the interventions required in order to facilitate SD4 (Table 10 of SWETS reference N1).

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

11.1 Background Paper 1 Development of the Core Strategy provides a summary of the reasonable alternatives considered. These reasonable alternatives comprise sites that are deemed suitable, available and achievable (SHLAA reference I2 and I3). Through the Sustainability Appraisal process a comparative analysis has been undertaken against the 22 Sustainability Appraisal Objectives (SA reference) as well as against each other in each town and therefore all reasonable alternatives have been considered.

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11.2 In response to specific omissions sites the following comments are made:

- Land north of Polegate - The Sustainability Appraisal considered this broad location against the broad location selected in the Core Strategy (SA Background Paper 5). It was considered that the site selected was more sustainable in terms of linkages to Polegate and Willingdon and a summary of this is provided in Background Paper 1 (reference A17, page 59).

- Land West of A22, Polegate - The site is not considered suitable under the Strategic Housing Land Availability Assessment, and upheld on appeal (APP/C1435/A/10/2130580) due to its location and its potential impact on the setting of the National Park and the inability to currently mitigate its severance from any settlement as stated in paragraph 408 of the appeal report which concludes that "the poor connectivity on foot or by cycle contravenes relevant social inclusion and sustainable travel objectives of PPS1 and PPG13". The conclusions to that appeal (paragraph 450) also confirm that SHLAA identifies other land that is not severed from the urban area by a trunk road and that there may be other locations with reduced landscape and visual impact (paragraph 427). In addition to these matters, there is the impact of the site on many views from, and the setting, of the National Park as well as expanding the "hard" urban edge along the SDNP boundary and the duty placed on all local authorities in Section 62 of the Environment Act which lead to the conclusion that the site is not suitable. As this site is not considered to be suitable it is not considered further or assessed as a reasonable alternative when clearly other opportunities are available.

- Intensification and expansion for employment on land at Mountney Bridge, Westham - It is considered that any intensification, if reasonable, can be considered under saved policies. Having said this, this area is not a growth area and therefore not deemed to have a strategic influence and has a particular constraint with regards to flood risk.