**WEALDEN DISTRICT (INCORPORATING PART OF THE SOUTH DOWNS NATIONAL PARK) CORE STRATEGY**

**MATTERS, ISSUES AND QUESTIONS**
**(Draft issued 3 November 2011)**

*References to policies in brackets indicate against which main matter (or matters) they will be considered. Any issues relating to the evidence base or other documents will be considered as appropriate under the relevant main matter.*

## Legal Compliance

- Has the Core Strategy (CS) been prepared in accordance with the Local Development Scheme?
- Has the CS had regard to the Sustainable Community Strategy?
- Is the CS in general accordance with the Statement of Community Involvement and public consultation requirements?
- Has the CS been subjected to Sustainability Appraisal?
- Is the CS in general conformity with the Regional Strategy?
- Has the CS had regard to national policy?
- Has a Habitat Regulations Assessment been prepared?
- Does the CS comply with the 2004 Regulations (as amended), particularly in terms of consultation arrangements?

**Matter 1: Spatial Strategy** (WCS1, WCS2, WCS3)
*Main issue - Whether the overall spatial strategy is soundly based, presenting a clear spatial vision for the District in accordance with national and regional policies.*

a) Does the Core Strategy contain an appropriate spatial vision and objectives for the District?
b) Do the policies in the Core Strategy reflect the identified spatial vision and objectives?
c) Have reasonable alternatives to the overall spatial strategy been considered?
d) Is there a clear audit trail showing how and why the preferred strategy was arrived at?
e) Is the overall strategy sufficiently flexible to respond to an unexpected change in circumstances?

**Matter 2: Settlement Hierarchy and Rural Areas Strategy** (WCS6)
*Main issue – Whether the settlement hierarchy and strategy for rural areas are soundly based.*

a) Are the categories in the Core Strategy settlement hierarchy appropriate and justified?
b) Does the evidence base support the position of individual settlements within the settlement 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?
d) Has the approach to development boundaries in some villages been justified by the evidence base?

**Matter 3: Housing** (WCS1, WCS2, WCS5)

*Main issue – Whether the overall level of housing provision and its distribution are justified and appropriate.*

a) Does the overall scale and distribution of housing provision accord with the requirements of the South East Plan (SEP) having regard to policies relating to infrastructure and the environment as well as those for housing? Is the Core Strategy in general conformity with the SEP in this regard?
b) Is there evidence since the SEP was adopted that would support a different level of housing provision in the Core Strategy from that in the SEP?
c) How does the overall level of housing provision in the Core Strategy relate to the need for both market and affordable housing in the District?
d) Has the distribution of housing between the different types of settlement been justified by the evidence base and does it accord with national and regional policy?
e) Have reasonable alternatives to the distribution and location of housing development been considered? Has it been demonstrated that there are no reasonable options that would avoid the infrastructure and environmental constraints identified in the Core Strategy?
f) Does the Core Strategy assist in providing a continuous supply of deliverable sites so that the housing requirements of the next 5 years can be delivered?
g) Is the Core Strategy likely to result in an adequate supply of developable sites in the plan period beyond 5 years?
h) Is there an adequate strategy for bringing previously developed land into housing use? Should there be a local previously developed land trajectory? Is the Core Strategy sufficiently clear about an overall target for the proportion of new housing on previously developed land and should this be included in a policy?

**Matter 4: The Local Economy** (WCS1, WCS3)

*Main issue – Whether the Core Strategy would help to sustain and strengthen the local economy.*

a) Does the Core Strategy accord with national policy, particularly PPS4: Planning for Sustainable Economic Growth and the Ministerial Statement on 'Planning for Growth'?
b) Is the scale and distribution of employment growth in the Core Strategy justified by the evidence base? Is there an appropriate balance between the scale and location of additional employment allocations in relation to those for housing?

**Matter 5: Retail Provision** (WCS1, WCS3)

*Main issue – Whether the Core Strategy provides a sound basis for retail development*

a) Does the Core Strategy provide adequate guidance on the future retail growth requirements of the Borough?
b) Is the scale and location of future retail floorspace in Policy WCS3 justified by the evidence base?

**Matter 6: Uckfield Area Strategy** (WCS2, WCS3, WCS4)
*Main issue - Whether the strategy for the Uckfield Area, including the Strategic Development Area (SDA), is soundly based and deliverable*

a) Have reasonable alternatives to the strategy been considered?
b) Is there a clear audit trail showing how and why the preferred strategy was 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?
d) Is the strategy sufficiently flexible to respond to an unexpected change in circumstances?
e) Is there sufficiently clear guidance on retail floorspace provision in Uckfield?
f) Is SD1 justified and deliverable?
g) Have reasonable alternatives to SD1 been considered – omission sites?

**Matter 7: Hailsham / Hellingly Area Strategy** (WCS2, WCS3, WCS4)
*Main issue - Whether the strategy for the Hailsham/Hellingly area, including the Strategic Development Areas, is soundly based and deliverable*

a) Have reasonable alternatives to the strategy been considered?
b) Is there a clear audit trail showing how and why the preferred strategy was 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?
d) Is the strategy sufficiently flexible to respond to an unexpected change in circumstances?
e) Is SD2 justified and deliverable?
f) Is SD3 justified and deliverable?
g) Is there appropriate justification for the phasing of housing at SD2 from 2017 and SD3 from 2021?
h) Have reasonable alternatives to SD2 and SD3 been considered – omission sites?

**Matter 8: Polegate and Willingdon and Stone Cross Area Strategy** (WCS2, WCS3, WCS4)
*Main issue - Whether the strategy for the Polegate and Willingdon and Stone Cross area, including the Strategic Development Areas, is soundly based and deliverable*

a) Have reasonable alternatives to the strategy been considered?
b) Is there a clear audit trail showing how and why the preferred strategy was 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?
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?

e) Is the strategy sufficiently flexible to respond to an unexpected change in circumstances?
f) Is SD4 justified and deliverable?
g) Is SD5 justified and deliverable?
h) Is SD6 justified and deliverable?
i) Is SD7 justified and deliverable?
j) Is there appropriate justification for the phasing of housing at SD4 from 2019?
k) Have reasonable alternatives to SD4, SD5, SD6 and SD7 been considered – omission sites?

**Matter 9: Crowborough Area Strategy** (WCS2, WCS3, WCS4)
*Main issue - Whether the strategy for the Crowborough area, including the Strategic Development Areas, is soundly based and deliverable*

a) Have reasonable alternatives to the strategy been considered?
b) Is there a clear audit trail showing how and why the preferred strategy was 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?
d) Is the strategy sufficiently flexible to respond to an unexpected change in circumstances?
e) Is SD8 justified and deliverable?
f) Is the loss of some employment land at SD8 without specific provision for employment uses elsewhere in the Crowborough area soundly based?
g) Is SD9 Justified and deliverable?
h) Is SD10 justified and deliverable?
i) Is there appropriate justification for the phasing of housing at SD10 from 2024?
j) Has the contingency urban extension north of the A26 been justified? What are the circumstances that support the identification of a contingency site here but not elsewhere in the District?
k) Have reasonable alternatives to SD8, SD9 and SD10 been considered – omission sites?

**Matter 10: Heathfield Area Strategy** (WCS2, WCS3, WCS4)
*Main issue - Whether the strategy for the Heathfield area, including the Strategic Development Areas, is soundly based and deliverable*

a) Have reasonable alternatives to the strategy been considered?
b) Is there a clear audit trail showing how and why the preferred strategy was 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?
d) Is the strategy sufficiently flexible to respond to an unexpected change in circumstances?
e) Is SD11 justified and deliverable?
f) Have reasonable alternatives to SD11 been considered – omission sites?

**Matter 11: Strategic Development Area in the Parish of Frant** (WCS4)

*Main issue - Whether the proposal for a Strategic Development Area in the Parish of Frant is soundly based and deliverable*

a) Is SD12 compatible with planning policy for Tunbridge Wells?
b) Is there a clear audit trail showing how and why the SDA was arrived at?
c) Have the infrastructure implications of SD12 clearly been identified and supported by the evidence base? Is it clear who is going to deliver the required infrastructure and by when?
d) Is the strategy sufficiently flexible to respond to an unexpected change in circumstances?
e) Is there appropriate justification for the phasing of housing at SD12 from 2026?
f) Have reasonable alternatives to SD12 been considered – omission sites?

**Matter 12: Affordable Housing** (WCS8, WCS9)

*Main issue - Whether the Core Strategy makes appropriate provision for affordable housing.*

a) Have the requirements in terms of the threshold and percentage for affordable housing been justified by the evidence base?
b) Is the possibility of different affordable housing targets on some allocated sites justified by the evidence base?
c) Has the effect of affordable housing provision on the overall viability of development been appropriately considered?
d) Has the presumption that 80% of the total number of affordable homes should be social rented been justified by the evidence base?
e) Does the change to the definition of affordable housing in Annex B of PPS3 to include affordable rented housing have any implications for the Core Strategy?

**Matter 13: Travelling Community** (WCS10, WCS11)

*Main issue - Whether the Core Strategy has adequately addressed the accommodation needs of the travelling community in accordance with national and regional policy.*

a) Has the Core Strategy made adequate provision for additional pitches for gypsies and travellers?
b) Does the Core Strategy accord with the requirements of Circulars 01/2006 and 04/2007 having regard to the Government's intention to revoke the Circulars?
c) What weight should be attached to the draft PPS on Planning for Traveller Sites and are there any implications for the Core Strategy?

**Matter 14: The Environment, Climate Change and Sustainable Construction** (WCS12)

*Main issue - Whether the Core Strategy makes appropriate provision for the protection of the natural environment and other environmental assets and for sustainable construction.*

a) Has it been demonstrated that the Core Strategy would have no likely significant effects upon internationally important nature conservation sites?
b) Has the proposed 400m 'exclusion zone' around the Ashdown Forest Special Protection Area (SPA) been justified by the evidence base?
c) Has the proposed 7km zone around the Ashdown Forest SPA, within which contributions to Suitable Alternative Natural Green Spaces (SANGS) would be sought, been justified by the evidence base?
d) Is there adequate evidence that the scale of SANGS required can be identified and are deliverable?
e) Has the evidence base adequately demonstrated that levels of development materially greater than those in the Core Strategy would be unacceptable in the light of the effects of nitrogen deposition on the Ashdown Forest Special Area of Conservation?
f) Is the limit on the quantity of residential development that might connect to the mains sewers relating to Hailsham North and South Waste Water Treatment Works (WWTWs), aimed at protecting water quality in the Pevensey Levels candidate Special Area of Conservation (cSAC), justified by the evidence base? Have water metering and water efficiency measures been fully taken into account?
g) If the headroom level at the two WWTWs has been justified, has it been demonstrated that all alternative options that would permit growth beyond this are being explored? Has it been shown that these options could not be delivered and that the headroom limit could not be removed during the plan period?
h) Should the Core Strategy give more guidance on the approach to water efficiency in new development?
i) Does the Core Strategy take sufficient account of sustainable waste management objectives?
j) Should the Core Strategy make provision for the potential need to enlarge Bewl reservoir?
k) Does the Core Strategy give appropriate guidance on sustainable construction and, if so, is the approach evidence-based and justifiable in terms of the Supplement to PPS1?

**Matter 15: Infrastructure** (WCS7, WCS13)
*Main issue – Whether the infrastructure requirements for the Core Strategy are soundly based and deliverable?*

a) Have the critical infrastructure requirements in the Infrastructure Delivery Plan been justified by the evidence base? What would be the consequences for the strategy if any of the critical infrastructure was not delivered? Is there sufficient commitment at this stage from the relevant organisations responsible for delivery?
b) Is it clear what infrastructure is required for the first 5 years of the plan and who is going to fund and provide it?
c) Does the Core Strategy take sufficient account of the introduction of the Community Infrastructure Levy?
d) Does the Core Strategy provide an adequate basis for the achievement of more sustainable forms of transport and travel?

Should there be a policy setting out the transport strategy for the District?

e) Does the requirement for all new residential development to contribute to the green infrastructure network and make provision for new open space in Policy WCS13 accord with the tests in Circular 05/2005 and the CIL regulations?

**Matter 16: Monitoring and Implementation**

*Main issue – Whether the Core Strategy has clear mechanisms for delivery, implementation and monitoring.*

a) Does the Core Strategy include clear arrangements for managing and monitoring the delivery of the strategy?

b) Does the Core Strategy and identify sufficient targets and milestones to enable the delivery of policies to be measured? Are the circumstances under which remedial action would be triggered sufficiently clear?