

## **SPATIAL STRATEGY**

- a. The Core Strategy (CS) does not contain an acceptable spatial vision and employment objectives for the District. It has failed to have regard to Government Policy in respect of employment provision as required by PPS4 and also the Government's latest statement on Planning for Growth through the prioritising of a growth strategy.

It has also failed to comply with the South East Plan in respect of the need to centre economic growth in the South of Wealden. The CS employment provision is based on the Council's "Revised floor space calculations for Employment Land Provision " dated June 2010 which pre-dated the Ministerial statement: Planning For Growth. In any event the Scenario chosen for the CS (Scenario A) has sought only to encourage a moderate step-change which would only see a reduction in the growth rate gap between Wealden and the South East as a whole.

In summary therefore the CS vision and objectives are unsound as they are inconsistent with Government Policy and the CS should be based on at least Scenario B which would plan to close the gap between Wealden and the South East in order to bring the CS closer to the National Policy which is now to plan for growth. Furthermore, additional employment provision needs to be made in the CS to allow for choice and also to provide for sites not coming forward.

- b. The policies in the CS do not reflect the identified vision that by 2030 Wealden will have successfully accommodated growth to meet future needs. The shortfall in housing provision has had a knock on effect on the employment provision through the calculations in "Revised floor space calculations for Employment Land Provision" June 2010 and in this respect alone the policies fail to respond to or reflect the vision. The CS policies do not, therefore,

reflect the identified spatial vision, are not justified and as a result the CS cannot be considered sound in this context.

- c. In respect of employment the CS has looked at alternative scenarios as set out in the “Revised floor space calculations for Employment Land Provision” June 2010 but have not justified why the restricted growth scenario was chosen.

Furthermore, there is no justification as to why higher growth rates were not looked at.

It is also important to question why following the Ministerial Statement, “Planning for Growth this issue was not looked at again. There is no identification of any harm which would result from identifying more employment land in order to give enhanced opportunities for growth and choice in respect of locations. In conclusion the CS in respect of employment strategy is unsound because it has not considered all reasonable alternatives.

- d. With regard to the CS Vision there should be added a further sentence as follows:

“In particular growth will be centred in the south of Wealden in order to address economic imbalance within the District.”

SP06 should be amended to increase the amount of additional employment floorspace to at least 100,000 sq m. In addition the words, “...principally located in South Wealden” should be added.

Policy WCS1 should be amended to increase the amount of additional employment floorspace to at least 100,000 sq m and the words, “principally located in South Wealden” added.

The uses B1/B2/B8 should be dropped to allow other employment generating uses to be included in this category. The total amount of additional floorspace to be created should be increased to 100,000 sq m.

Policy WCS 3 should be amended to increase the employment floorspace at Polegate and Willingdon/Stone Cross by at least an additional 40,000 sq m to provide for a business park at Bramley Farm (new site SDA13)

Policy WCS4, Strategic Development Areas should be amended to include SDA13 , Land at Bramley Farm, Polegate.

Para. 6.30 should be amended to include reference to “...the need to provide a Business Park at Polegate to take advantage of infrastructure provision, public transport and access to the town centre”

Para 3 should be amended to include a fifth bullet point “provision for at least 40,000 sq.m of employment floorspace at Bramely Farm to the north of Polegate with vehicular access to the A22, pedestrian and cycle links to the town and access to the Polegate Hailsham bus corridor”.

Figure 8 should be amended to include the Bramley Farm as an employment site, SDA 13.