

HAILSHAM TOWN COUNCIL'S

RESPONSE TO

THE WEALDEN LOCAL PLAN CONSULTATION

Hailsham Town Council (HTC) is willing to work constructively with all stakeholders on its preferred option for testing as outlined in the Wealden District Council (WDC) Local Plan - Wealden Local Plan (WLP). However, HTC feels that a number of questions are posed, rather than answered, in the draft plan and clear answers would be sought before a formal acceptance of the key 'sustainability' issue of the draft plan can be agreed.

The following document is an outline of the areas of concern that will need to be addressed exhaustively, evidenced correctly, and both the feasibility and affordability demonstrated before HTC can be convinced to fully support the plan.

Should the required infrastructure feasibility, funding (i.e. Community Infrastructure Levy (CIL) contributions) and affordability results come up short then the housing numbers should come up proportionately short.

We welcome WDC front-loading infrastructure to ensure no further detriment to the existing residents of Hailsham. However, we would seek further assurances over the scheduling and co-ordination of the revolving infrastructure fund with the other key stakeholders e.g. East Sussex County Council (ESCC), Clinical Commissioning Group (CCG), etc.

Education

We have concerns over the budgets and lack of CIL contributions indicated in the plan to actually meet the needs of the future provision of education. ESCC's own data shows a huge deficit in early years provision, this year there are 120 places short of the need. This will only increase when Government funded hours double. There are little signs of any increase in privately run nurseries or childminders due to the financial challenges of running such a business. With no ESCC owned land available, school provision will be developer led. HTC must have direct input into the Area Action Plan (AAP) to identify the future growth of schools. The Higher Education (HE)/Further Education (FE) College has made little progress as students prefer the courses provided by neighbouring Eastbourne colleges. Therefore there is merit to look to the future of broader FE services in Hailsham. We also feel that there has been no consideration for a special needs school and would like this reviewed with some urgency. HTC will actively support and encourage the use of our community spaces/buildings for a range of family activities and care services.

Translating housing numbers and population statistics into recommended infrastructure, whilst tentative, gives some idea of the development which will be needed. Data from Department for Education (DfE) show there are 23,727 pupils and 22 Primary School in East Sussex (1080pupils/school). 9,380 more households even at an optimistic projection of one child per represent nine more primary schools needed. The projections from ESCC clearly indicate a growth rate of significant proportion in school population (11-16), which with new development, will become ever larger. www.gov.uk states there are 26,902 students in East Sussex in 26 secondary schools (1,200 in Hailsham Community College). Extrapolating the data for the additional homes, another secondary school will be required.

Major issues the town faces:

- Recruitment and retention of teachers; a problem not solved by affordable housing for teachers.
- ESCC's admissions process causes huge transport issues as families travel across town to go to chosen schools/nurseries; not solved by walking, bus routes or cycle routes.
- ESCC cuts; to avoid further deterioration of existing schools and pupil learning, a greater emphasis has to be given from Wealden to funding and building schools to avoid undue pressure on existing schools.
- In larger schools (2+ entry form schools) before and after school provision is unable to be met; as you increase the working population this becomes a key issue.

Medical Services

In the WLP there is no health assessment of Hailsham.

This is unacceptable given the proposed increase in homes that should only be proportional to our current provision of National Health Service (NHS) services deliverable today.

Current figures show 14% of older residents are income deprived.

16 % of children come from households of low income.

Poverty is on the rise 21% of children in Hailsham attract a pupil premium for social and emotional needs.

The health of our town is poor with obesity, smoking and alcohol consumption and of utmost concern are the rising mental health issues that affect about 2,000 Residents. In addition to this the health provision is widely accepted as inadequate for the Hailsham area due to the downgrade of the District General Hospital (DGH).

Vaccinations for Herd Immunity are well below acceptable levels and the risks of the programme of delivery need addressing urgently.

WLP needs to provide now within the infrastructure:

- A community Hospital will be a requirement due to downgraded services at the DGH
- Build a rehabilitation residential centre in order to free up bed blocking at DGH.
- Community Provision of Day Care for our aged population. Residential homes are required along with specialist dementia places.
- Home suitable for retirement including bungalows, flats, assisted housing and purpose built retirement village(s) proportional to the local need.

- Be visionary about the use of community buildings to incorporate a range of NHS services i.e. health visitors, play specialists, disability groups and day clubs.
- Pursue with vigour the promised polyclinic.

East Hertfordshire, as a component of its appraisal, commissioned a separate Health Impact Assessment along with its proposed development plan. WDC fails to identify the impact on health of the preferred option and the increasing urbanisation in the south of the district.

The Nuffield Trust survey indicates 6.8 doctors for every 10,000 people (exceptionally low by comparison to European Union countries). Even if the Local Plan is limited to a doubling in population a further 13 doctors are needed. As current vacancies cannot be filled, it seems optimistic to believe that further requirements will be met. Towns with a population of 40,000+ all have a hospital, but the WLP fails to mention hospitals and hospital doctors. Equally four dentists per 10,000 people (Health and Social Care Indicators from www.gov.uk) would mean 12 more dentists would be needed.

Issues include:

- The ability of health services to meet the needs of growing populations is a national concern, particularly with regards to the number of General Practitioners (GPs) being trained and impact upon primary health care provision to meet the needs of local communities.
- There is a need for capital and revenue funding support in order to provide new facilities.
- Where significant growth is proposed in an area which is currently served by a branch surgery, issues may arise in relation to primary care provision. Areas of concern at present are Uckfield, Heathfield, Mayfield and Horam in the north.
- The pace of development will present problems with provision. For each additional 2,000 people an extra GP may be required. There are a number of GPs in the area close to retirement and recruitment may be a problem.
- Additional workforce issues in relation to nursing staff and support staff.
- GPs are independent practices. Whilst CCG's work with GP practices, the CCG cannot require them to expand to meet new demands. This could leave the CCG with problems where there are significant numbers of people requiring treatment.
- Ensure sufficient land is allocated for the demand and that there is strategic infrastructure provision for educational, health or recreational provision to support this plan that has been identified through the Infrastructure Delivery Plan (IDP) and supported by other feasibility and need studies.
- A health assessment should be commissioned in order to deliver the plan.

Road Transport

The Movement & Access Strategy for Hailsham and Hellingly (MASHH) project has identified many aspects of road transport issues in and around Hailsham already:

- Ersham Road/South Road/Diplocks Way Junction;
- Battle Road/High Street junction;
- Western Road / South Road junction;
- Hempstead Lane to Leap Cross road upgrade (including roundabout.)

A full study of the impact on the existing and new town areas will need to be commissioned, and should be a priority for the AAP to investigate at its earliest convenience.

We welcome the statement from WDC that the A27 is a 'show stopper.'

The requirement that development is predicated on the delivery of improvements to the A22 and A27 is not an argument that merits consideration within the current views of the Department of Transport (DoT) - A27 Upgrade.

It is accepted that a complete review of car parking will be needed for the town due to the pressure that already exists. HTC supports the WDC policy of free parking, however accepts that the provision of schemes such as park and ride or multi-story parking could carry some cost.

Public Transport

Hailsham will require an innovative public transport service to work around the restrictions on the road network currently.

The goal should be direct & fast links to an upgraded Polegate Parkway station that serves Hailsham.

The proposals for the 'Quality Bus Corridor' at a cost of £10M+ will in the face of the scale of the development, be largely redundant before the project even sees the light of day. Thus this should be halted immediately, the funding available ring-fenced, and a new plan be brought forward that can actually deliver the public transport need for the next 20- 30 + years. Buses can only travel as fast as the slowest vehicle in their way and a bus corridor would not address the 'pinch points' already in the town.

Conservation Area

There are concerns over the Conservation Area proposals for High Street and these need further consideration and discussion before a final position can be submitted.

Economic Plan and Employment

HTC is sceptical over the methodology behind the employment opportunities suggested to be created as part of the plan. There is a need to attract skilled labour, 'hi tech' and professional employment to enable a more cohesive and affluent society.

There is a concern that the growth forecast for Wealden is suggested as 67% faster than Lewes and Rother to 2025, 126% faster than Eastbourne and 210% than Hastings. There are no reasons put forward to support or explain the large difference in scale of these figures, which given their magnitude must raise serious concern regarding their veracity.

An analysis of the options produces uncomfortable conclusions, there is very little recent history of manufacturing or business, so raising the profile and dependence on retail and rural economics becomes more important.

Here there is the conflict between sustainable development and travel, accessibility to jobs and communications. There are options which have opposite proposals and are contradictory. Option 40 for example, uses the idea of resisting provision (*subsection 1*) and yet supporting it (*subsection 3*.)

As a more general criticism there are laudable aims, but no plans, objectives or actions as to how they might be achieved and certainly no predictions about potential outcomes and figure. However the proposed developments are within the countryside, do not promote sustainable development and do not reduce ambient particulate matter. The issue of increased carbon emissions is repeatedly quoted as problematic in this section: encouraging movement in tourism, converting rural buildings (*Tables 45, 46, 48, 49, 50*.)

The proposed equestrian options and conversion of rural buildings will not yield the number of opportunities desired, but even if they do accessibility will be a key issue.

It is a fact that rural wages tend to be lower than the average, so demand on social and affordable housing will increase as a result of this proposal. The Local Plan acknowledges in its agricultural and rural commercial activity sections that there would be less conversion of existing buildings and more large scale expensive dwellings.

In 'A critique of the Strategic Housing Market Assessment' the economic growth of Wealden is challenged at a number of levels: the use of data, the conclusions and relationships and future projections. The arguments will not be rehearsed here other than to reinforce the validity of the interpretations about the economy and employment.

Tourism

HTC seeks further clarification of the vision and deliverability of the 'large scale tourist attraction' along with substance and method of attracting such private sector funding in the area. Furthermore there appears to be no allocation for the land that would be required.

A survey should be conducted of the proposed tourism site to compare data to supply and determine if the advantages cited are realistic and contribute to the economy as suggested

Sport and Leisure

There is evidential demand for a large multi sports facility and, in particular. team sports facilities, including astro turf pitches, indoor sports halls and specialist sports.

Land allocation for sport and leisure is not specified in the WLP at all and must be identified appropriately, and adequately to ensure sports at all levels can be accommodated.

Design and Layout

Rigid adoption of a newly 'beefed up' design guide would need to be agreed ensuring the mistakes of years gone by with poor quality housing built in too close proximity to each other are not made again – real substance to the words from WDC will need to be given.

Planning aspects such as density levels, materials used, communal space and styles of buildings should be closely attended to in this document and enforced.

The proposed 'extension' to the town centre will need to be sympathetic to the existing town in order to avoid an 'old town' vs 'new town' divide in terms of trader appeal and shopper experience.

Close attention should also be made towards ensuring that land allocation is appropriate, with schools, medical and community facilities in the right places for the residents.

Social Infrastructure

There is a need to construct a new plan to address the burials situation. The proposal to build approximately 4000 new houses to the south side of Hailsham and approximately 5400 in the parish of Arlington, with future planning applications for infill of one off or small developments of more houses in the next 6 years as an add-on to the proposed housing projection.

The existing cemetery has approximately 1200 spaces remaining. Therefore, there is a need for negotiations with developers or land owners to procure land for an extension to the cemetery in line with the projected future expansion of Hailsham.

A Working Party/Committee to investigate the infrastructure needed to meet the requirements as indicated:

- Expansion of the Cemetery;
- Existing and future projected burial requirements;
- New cremation interment area;
- Construction of a new road giving funeral corteges better access to the interment site;
- Modernisation of the chapel.
- Co-operation from the funeral directors to be included in the plan;
- Consider the overall layout, if any is required to accommodate different religions;

- Possibility of a Crematorium – reasoning that Hailsham could accommodate other parishes i.e., Berwick, Ripe, Willington, Polegate, Stone Cross, Chalvington, Chiddingly, Magham Down and Herstmonceux or within a given radius of Hailsham;
- Closer liaison with Hellingly.
- Five new Community Halls with full disabled facilities.

Environment

An Environmental Impact Assessment is needed to study the impact of the options before any further plans are discussed.

The environment forms one of the core roles of sustainable development, and offers a number of dimensions for potential delivery. We analyse our issues against this framework.

Data from the National Traffic Survey (NTS) (2012) and the DoT (2015) conclude that 2.6 trips/day/person are made with 68% of people using personal transport to travel to work.

The Office for National Statistics (ONS) adds that the South East has the highest car ownership, number of vehicles (double the next area) and accidents (2014).

Given the lack of rail infrastructure and paucity of public transport these figures are likely to remain at least stable (as they have since 2007). East Sussex County Council (Focus 2012) states that traffic is the main contributor to air quality. The 97% increase in housing for the area (9,500 houses) will have significant and fundamental effects on: congestion (ONS) public health (BMI: The Public Health Problem which won't go away 2015) accidents and road infrastructure. A reasonable optimistic estimate would be an additional 50,000 journeys. We also question the capacity of our local road network to sustain a 97% growth in housing numbers.

It would seem to us that this element will not minimize the pollution or reduce the carbon economy, which are prerequisites of sustainable transport; rather particulates, greenhouse gases and air pollutants are likely to rise. Given the demography of the locality we have population groups which would be inherently more sensitive to this ambient matter with associated public health concerns.

Additionally this will be compounded by the necessity to travel to use social, educational and health infrastructure.

A significant criterion of the delivery structure emphasises the protection of the Green Belt. Strategic Sites Development Plan (SDA3 2012) identifies 87.5% of north Hailsham to be Greenfields and adds that there would be a change in Hydrology (as well as the coalescing of villages) if this area was used for housing development. It is, in fact, a significant strategic area for building. The other site examined was east Hailsham (SDA2 2012) where Wealden District Council listed all the objections including traffic increases, the sensitivity of landscape and the local hydrology. This is also a flood risk which impermeable surfaces will exacerbate.

The proposed development area lies between three environmentally sensitive locations (Ashdown Forest, Pevensey Levels and South Downs) and as a result the housing is concentrated into a relatively small area. The desire to protect the sensitive sites is laudable, and would give rise to very little opposition. However, as a result this reduces the amount of land available for building. The housing allocation for Wealden does not take this into account and so there has to be a compromise.

There can be no concession when it comes to protecting these sites, and so the assessed housing need needs to be reviewed.

If the policy is agreed there will be an increase in housing and population density and erosion of existing landscapes. There would be the loss of ecosystems and habitats, the destruction of traditional field patterns, be visually damaging, conflict with the character of existing structures and loss of amenity space. These will cause deterioration in the natural environment.

The closest sensitive habitat is the Pevensey Levels (Site of Special Scientific Interest (SSSI)), RAMSAR, and Special Area of Conservation (SAC) and The Habitats Regulations already makes reference to the significant effect of the Core Strategy with respect to Biodiversity, drainage and the failing water-bodies, and this plan proposes further development. Wealden outlines in its Biodiversity Paper (2011), the contribution of further developments to loss of biodiversity, the loss of ancient woodland and the fragmentation and deterioration of habitats. In a further paper (2013) Wealden also cites the need for more amenity space, a deficit in provision of leisure space, accessibility and Planning Policy Guidance (PPG) 17 condemns development in East (SHH2) and North (SSH5) Hailsham.

It would appear that delivering sustainable development to the extent proposed would have significant effects on trying to enhance the environment, improving the biodiversity, minimising the waste and pollution and lowering the Carbon economy; criteria upon which the environmental role so heavily relies.

Additionally the policy needs to protect ancient woodland ecosystems.

Waste water would appear to be a major stumbling block to this plan and its preferred options. Therefore, as the waste water provider states that new technology able to handle this size of building provision will not be in place until 2022 NO new large scale building should be considered until at least this date or until the technology is in place, tested and proven, whichever is the later date.

The whole area suffers from a high ground water table that makes adequate provision for surface water drainage difficult and will exacerbate flooding both in the immediate area and the wider areas of Alfriston (in the case of the Cuckmere catchment) and Eastbourne (in the case of Levels).

Utilities and Services

All service providers must be encouraged to contribute to the consultation process and AAP

Broadband and mobile phone masts are of primary concern as there is known pressure on these services already.

Social Equity and Social Impact

The allocation of social and affordable housing within the plan needs a full assessment based on the current provision within the town and surrounding area.

The settlement hierarchy has inconsistencies and need to be reviewed.

Police fire and ambulance services will require significant service provision alterations. Hailsham is already the busiest retained fire station in the district .

Infrastructure Finance

There are many concerns over the financing of the infrastructure that will be required to deliver the plan and significant effort will be required to ensure the funding becomes available and a process of transparent reporting and open accounting occurs throughout.

A realistic assessment of the cost of infrastructure and the chances of government grants to meet the shortfall will be required.

Summary

This council is of the view that all of the provisions should be met in order to handle this scale of housing. Any reduction in the infrastructure provision for Hailsham MUST MEAN a proportional reduction in housing provision over the period of the plan.

This document was written by the Hailsham Town Council Neighbourhood Plan Sub-Committee with delegated authority to respond on behalf of the Town Council.

Members:

Councillors:

N S Collinson
Ms C. Collinson-O'Toole
Mrs S Cottingham
P Holbrook
Mrs. M Laxton
G. Moore
J Puttick
P Soane
C. Triandafyllou

Ex Officio:

Ms V Browne
S Cross
Mrs H Deehan