



# HAILSHAM TOWN COUNCIL

## NEIGHBOURHOOD PLANNING SUB-COMMITTEE AGENDA

### **NOTICE IS HEREBY GIVEN**

Of a meeting of the Neighbourhood Planning Sub-Committee, to be held at the Fleur-de-Lys Council Chambers/Meeting Rooms, Market Street, Hailsham, on

**Wednesday 9<sup>th</sup> December 2015 at 7.00 p.m.**

1. **Apologies for Absence**  
To receive notice of declarations of personal and prejudicial interest in respect of items on this agenda.
2. **Declarations of Interest**  
To receive notice of declarations of personal and prejudicial interest in respect of items on this agenda
3. **Minutes of Previous Meetings**  
To note and adopt or amend the minutes of the meetings of the Neighbourhood Planning Sub-Committee held on Tuesday 1<sup>st</sup> December 2015 and Wednesday 2<sup>nd</sup> December 2015
4. **Hailsham Town Council's Response to the Wealden Local Plan Consultation**  
To work towards agreeing the committee's approach to and contents of the response to the WDC Local Plan Consultation.

Dated 7<sup>th</sup> December 2015

JOHN HARRISON  
Town Clerk

### **Committee Membership:**

Councillor C. Collinson-O'Toole  
Councillor S. Cottingham  
Councillor P. Holbrook  
Councillor M. Laxton  
Councillor G. Moore  
Councillor J. Puttick  
Councillor P. Soane  
Councillor C. Tasane

Councillor C. Triandafyllou

### **Ex-Oficio Members:**

Ms V. Browne  
Mr S. Cross  
Ms H. Deehan

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## REPORT BY CLLR. SHARON COTTINGHAM

- CONSERVATION - For sanities sake we need open areas for us to walk in, parks, more, to bring new communities together. What's happening to the area of black material, which was once a children's playground by Butts Field?; it's nice to be able to walk in woodlands and see farms. Life is so traumatic at times it's necessary for all of us to take time out and see life through different eyes.
- TRANSPORT – The removal of the railway caused many residents hardship and I know some people would like to see some sort of reinstatement. The current backlog of traffic leading into the town from all directions mostly at peak times is a problem. The Cuckoo Trail is a wonderfully tranquil area for walking, cycling, horse riding but some people have thought maybe there could be a form of light gauge railway running along the side but how the area could accommodate all desires may be for someone else to help with.
- EMPLOYMENT – The need to attract more businesses to fill up the Station Road Industrial Estate and keep the Diplocks and Swan Industrial estates fully operational. Maybe a need to suggest that local people might be employable by those firms desiring to build here.
- HOUSING NEEDS – a) There is a need for enough housing to firstly cover existing people in our area, i.e. those young people leaving home and wishing to set up on their own. Renting – desirable for some social housing, plus a need for housing only for those who have never bought a house, which would be affordable for them b) Also, those people who cannot live anymore as a family and need to separate. c) Those of us who have become disabled or ill and who want to live somewhere we believe to be more suitable. d) Allotments for residents to grow their own produce should be included in new estates. e) Somewhere pleasant for visitors to Hailsham to stay – I think there are quite a few pubs, holiday homes, Bed & breakfasts, motels and hotels but it's still worth bearing in mind.
- EDUCATIONAL NEEDS Already Hailsham schools are at bursting point so buildings required for nursery, infant/junior/secondary/college requirements. I do not envisage these having to be new buildings as it would be I think desirable to up-grade an existing, vacant building.
- UTILITIES & SERVICES Water is, I know an issue. Also drains and drainage on an area which is not unfamiliar with flooding. Ever more housing without great thought to all the necessary plumbing requirements etc. More gas and electricity installations for the homes. More telephones to be made available. Mobile phone usage so the need for everything needed there. Green energy – many and varied suggestions. Sensibility in understanding the impact of various forms of energy on the environment and how to ameliorate these. Wind turbines.
- RETAIL I'm not happy with shops which have been empty for quite a while for various reasons. Prime examples are the empty (ex bedding unit) on the corner of George Street/Station Road, the Hollywood Nails in the High Street which had the fire, the Wizard unit in the Quintins. Statements have been made regarding the need for large high street shops such as in Eastbourne and other large towns. Personally I've been happy to travel to Eastbourne or some other large town for items I can't buy at home. More buses need to be facilitated for those who can ill afford transport to

get to other places in the locality. I think the use of the high street units has been improving and I love the Millie's shop. To buy items which aren't churned out by the million is wonderful. Also I think the charity shops have a variety of good quality items for sale. Most people here like the fact that our town is a market town, not a large city type place. I love the shops in Lewes which is our County town; they are individual and interesting. There are less people resident in Lewes than here.

OVERALL – I would like to retain the flavour and style of Hailsham as an individual market town of friendliness and kindness. A town where people can walk in safety knowing it is a good place to live.

(Also I would like to add that I wonder if the old mill at the bottom of London Road cross sectioning with Horsebridge could be adapted to make a school or cottage hospital. Does it flood?)

"why build a sports field on the estate off hempstead lane when the country park is almost opposite but no sports fields, parks off any estates off battle road, where you are near the leisure centre. Developers should be made to put a sports field or park on every new estate otherwise there is no where for people to go, ,meet, kids to play, or dog walk without going in the car. Then there are complaints about dog mess on pavements, well what do they expect if all the green spaces are taken away or built together in one area." – Response from member of the public.

**Suggested Response to WDC of the Town Council's Position re the Wealden  
Draft Development Plan for the Hailsham Area:  
Chriss Triandafyllou**

Hailsham Town Council will work constructively with all the other stakeholders in implementing the Wealden Local Plan; taking the proportional housing which is supported by infrastructure and which reflects the priorities of the town.

Hailsham is a growing market town situated in the south of Wealden. It is the largest town in Wealden and also the largest inland town in East Sussex. It has no train station, slow bus connection to Eastbourne, Polegate etc. and no night buses. It has a number of pubs and restaurants, one cinema, 4 small to medium supermarkets, an ageing cattle market and a few street and farmer markets per month. The High Street has few empty shops, relatively, but a large number of charity shops.

**Medical Services**

The Eastbourne Area PCT has for some time struggled to persuade doctors to set up practices in Hailsham. In the mid 2000 the residents of Hailsham were promised a Polyclinic which never happened. The doubling of Hailsham with 9,000 new homes, demands a multi-service Medical Centre, which should be committed to by our CCG in advance.

**Conservation  
Environment**

**Road Transport**

The current roads in the centre of Hailsham are already inadequate at either end of a normal day, given the current population, let alone the housing growth planned. We require a detailed plan to ameliorate the traffic problems on South Road and London Road. Areas around the Town's boundaries are served mainly by single-track country lanes, apart from Ersham Road and the A271. A comprehensive up to date traffic study is required with suggested alternative solutions.

The main Traffic bottlenecks are following junctions:

- 1) Ersham Road / South Road/ Diplocks Way
- 2) Battle Road / London Road
- 3) Station Road / George Street / South Road.

There are very few bicycle lanes In Hailsham.

The access to Hailsham is via the A22 from the north and south, and the A27 coastal road from Lewis (west) and Bexhill (east). The A22 north (heading south) is almost stationary for several miles, most weekday early evenings.

The A27 West to Lewes has been considered for improvement for many years, and without an upgrade to dual carriageway in places, and a bypass at Selmeston, the minor tinkering of the last few years will not deal with the large increase of traffic caused by the residents of 9,000 more houses.

**Public Transport**

Rail is only accessible via Polegate station which has limited parking and poor access. The rail connections to London are very slow and overcrowded at peak times.

The County Council plan for a fast bus corridor from Eastbourne to Hailsham, makes little sense until the traffic load in South Road is ameliorated.

It is essential that parking facilities in Polegate are improved, and the size of trains, or frequency are also improved.

Night buses should be introduced.

## **Education**

The existing schools in Hailsham are already at full capacity, and written guarantees will be needed to ensure that new schools are built in or near the new developments.

The open ground will be need to be identified in advance and work started as houses are being built.

5-6 new primary schools will be required. HCC will need to be expanded or a second secondary school created. In addition, a 6<sup>th</sup> form college will be required.

## **Sports and Leisure**

Hailsham area is already underprovided for sports provision and a large amount of land will need to be allocated for a sports park including built facility for both indoor and outdoor activities

## **Economic Plan**

--Rural Economy

--Tourism

--manufacturing

## **Employment**

Hailsham and area has a long history of higher than average unemployment and society deprivation. There are no existing large local employers to employ the anticipated new arrivals. The poor road access has long been a disincentive for employers to relocate here. Existing Hailsham business parks are gradually turning to out-of-town centre retail units.

With a lack of local employment, those seeking work will have to travel, to Eastbourne, Brighton, etc, using already the already crowded A22 and A27 at peak times

WDC needs to provide evidence of how sufficient new industry and jobs will be created to enable this project to succeed.

--retail

## **Social Infrastructure**

The Hailsham cemetery needs to be able to expand within the next 10-20 years. It may also be a good idea to add a crematorium to the cemetery. This would provide a necessary service and also be a source of additional income for the town.

**Wealden Design Guide**  
**Social Equity**  
**Utilities and Services**

**Infrastructure Financing**

The current housing growth, for which the Core Strategy is mainly responsible, has not led to adequate infrastructure improvements. In fact, according to WDC documentation there is at least £73 million shortfall on required infrastructure. The only scheduled improvement to the town is the High Street redevelopment project, due to start in February.

We feel that at this moment the proposed additional housing which is projected to double the Hailsham Area housing stock, is excessive. As history has shown and despite assurances of infrastructure funding, simple arithmetic calculations show that without significant government grants, there is insufficient developer income projected, that could cover infrastructure.

HTC appreciates that WDC has established and will continue to monitor openly an appropriately sized Revolving Infrastructure Fund (RIF) for the required infrastructure needed for any new development, such as (but not limited to) education, health, transport (both road and public), business and employment development, sport, tourism and leisure or as otherwise identified in the IDP. We have, however, not been shown an estimate of the size of this fund and what percentage of required infrastructure it hopes to cover

There are basic questions that need answering.

- 1) A realistic assessment of the cost of infrastructure and the chances of government grants to meet the shortfall.
- 2) What will happen if the A27 improvements do not take place, or are delayed.

**Response to WLP conservation Area  
By Paul Holbrook**

To support option 1 to extend inclusion of the High Street and London Road as previously some of these properties were subject to compulsory purchase from ESCC then when the proposed works fell through some 7/8 years ago individuals were paid compensation at the expense of the public purse .

We support options 2/8 for inclusion .

We support that area 11 which is the Tesco Site be excluded from the current boundary .

Option 10 .whilst accepting that this area has undergone extensions and alterations over a period of time that were granted under the current Wealden guidelines of design ,the loss of footfall,car parking and existing traders would have a major detrimental and impact on the look of the high street and the investment of the improvement about to take place .A new modern complex would not lend itself to be an add on on this Site .

No amount of redesign of this particular area of the current high street will address the congestion of traffic and further loss of parking or bring in new customers to our high street .we do not support this change for testing .

WDC need to understand and survey the shopping habits of its residents before testing for option 10 .

Area 9 this is a modern development which is not of historic value and would lend itself to a change in boundary .

## **Suggested response – Steven Cross**

### **Environment**

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 (2012) and Department of Transport (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 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) on public health (BMI: The Public Health Problem which won't go away 2015) on accidents and on 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 demograph 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, Pevensy 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 spoil 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 current structures and loss of amenity space. These will cause deterioration in the natural environment.

The closest sensitive habitat is the Pevensy Levels (SSI, Ramsar, 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 policy PPG17 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.

## **Sustainability**

The centralisation of infrastructure will have significantly adverse effects on the smaller communities of the South Weald.

In the short term people will travel to access resources and facilities like schools and medical clinics, increasing reliance on transport which runs counter to the NPPF framework, which condemns planning that produces greater dependence on cars. Over time the villages will decay and become more isolated as people move to more vibrant centres.

The emphasis on the South Weald for housing development is also unsustainable as movement will substantially increase. The demand on infrastructure raises issues of land acquisition, buildings lying idle whilst populations increase.

## **Employment**

An analysis of the options produces uncomfortable conclusions, there is very little history of manufacturing or business, and 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 section both in conversion of buildings and repeats in rural commercial activities, that there would be more likely a trend towards 'large scale expensive dwellings'.

A final observation; it might be wise to conduct a demand survey (eg tourism sites) and compare to data about supply (where are these sites) to determine if the advantages cited are realistic and contribute to the economy as suggested.

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.

## Infrastructure – Steven Cross

One theme emerges repeatedly from the letters, petitions, street canvass and the variety of other responses: the provision of infrastructure to support the housing proposals.

History and experience produces anecdotal evidence that promises and potential developments are not achieved. Examples? The current systems do not support present demands; doctors surgeries ask for registrations to be suspended, children have to be taxed to other school. It is with this questioning perspective that individuals view the proposals.

There will be a growing number of vehicles on our constrained road system. Traffic surveys demonstrate that gridlock occurs at the traditional times of the day (morning and evening rush hours), but additionally South Road and George Street provided narrower lanes and cause bottlenecks all day. The movement of cars out of the town as individuals move to work, and into town to use the resources will worsen the situation. The potential traffic flows can be mitigated by changing direction of movement or by making 'one-way' systems, but they cannot compensate for the huge increase in total that will be generated by the proposals. Cars use 'rat runs' (Summerheath Road exemplifies this) to avoid the centre, meaning that the impact on these unclassified roads will be even greater.

Translating housing numbers and population statistics into recommended infrastructure, whilst tentative, gives some idea of the development which will be needed. Data from DoE 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 1 child represent 9 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](http://www.gov.uk) states there are 26,902 students in East Sussex in 26 secondary schools (1000 students/school and 1,200 in HCC). Extrapolating the data for the additional homes, another secondary school will be required.

The Nuffield Trust survey indicates 6.8 doctors for every 10,000 people (exceptionally low by comparison to EU countries for example). Even if the Local Plan is limited to a doubling in population this is a further 13 doctors 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 WDP fails to mention hospitals and hospital doctors. Equally 4 dentists per 10,000 people (Health and Social Care Indicators from [www.gov.uk](http://www.gov.uk)) would mean 12 more dentists and their practices would be needed.

This very brief analysis of infrastructure raises two vital issues: where are the financial resources and where is the space needed? The reliance on developers must be very limited and certainly not yield the sums required to address the construction. The dependence on the plan for upgrading the A27 and moving the A22 would surely mean that central funding would be a necessity. It is also evident that surgeries, clinics, and schools need car parking, which requires further land. Access to these places needs roads. People do not use public transport; they do not walk with their children to school; they use cars. A more vibrant town centre which does not rely on 'takeaway', 'charity shops' and 'hairdressers' will attract more visitor numbers, with the implications that result.

We propose that a simple scale is used which relates development size to infrastructure. That this is a proportional relationship: the less the infrastructure, the fewer homes can be supported.

## **Subject: Education – Mary Laxton and Helen Deehan**

We have grave concerns over the budgets and lack of CIL contributions indicated in the plan to actually meet the needs of current and future provision of education. ESCC own data shows a huge deficit in early years provision, this year there is 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. We demand HTC has direct input into the AAP to identify the future growth of schools. The HE/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 e.g baby clinic.

Major Issues The Town Faces;

- \* Recruitment & retention of teachers; a problem not solved by affordable housing for teachers.

- \* ESCC 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 & after school provision is unable to be met; as you increase the working population this becomes a key issue.

**Subject: Sports Facilities – Mary Laxton and Helen Deehan**

Whilst there is a desire for a large sports park, this would not be sited in Hailsham and would be at some considerable cost. With limited CIL contributions there is an immedia need to address the opportunity to site community sports facilities across the schools. SKiL CIC are a pioneer is sports led health for our children and community and are a much needed before & after school provision and community resource. We would like to see any Hailsham school site explored with greater sports facilities in the first instance which directly helps the health needs of future generations.

Health / Well being All based on the latest JNS Scorecards .(2013) – **Mary Laxton and Helen Deehan**

In our CCG locality there are currently 29,399 patients registered at 7 practice locations .  
We are currently 4.5 FTE GPs Short  
Current lists for new patients are closed 25% of Patients are over 65  
46 % of Patients are over 85  
By 2019 increase in 65 yr olds is 11% and 85 yrs olds is 21%

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 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 is our rising mental health issues that effect about 2,000 Residents .  
Vaccinations for Herd immunity is well below acceptable levels and the risks of the programme of delivery need addressing urgently .

WLP needs to provide now with in the infrastructure:

- 1, A community Hospital .....due to downgraded services at DGH 2, Build a rehabilitation residential centre in order to free up bed blocking at DGH .
- 3 Community Provision of Day care for our Aged Population Residential homes are Required and specialist dementia places.
4. Suitable retirement size homes to include bungalows .Flats ,Assisted Housing and purpose built retirement village proportional to the local need 5. be visional about the use our community buildings to incorporate a range of NHS services ie Health visitors,play specialist ,disability groups day clubs .
- 6 .Peruse with vigour the polyclinic promised .
7. The provision of our own crematorium and Woodland burial Area must be explored with urgency and out burial records to go digital .

To Look at Transport links and provision of accessible buses that all residents can use on a daily Basis and review the usage and routes of the cuckmere buses to further accommodate our ageing residents .

**Mary Laxton**

**Provision of Employment/ retail outlets**

My opinion is that for any meaning employment huge investment would need to be put in place in enticing and encouraging large companies or digital or media or manufacturing to relocate in our area . In reality this is not an attractive business proposal. Over loaded roads and poor commuter facilities would not attract the large players .

Any proposed Retail units could be sited at Coppal near polegate .I doubt that any large retailer ie Next .M&S .BHS, River Island etc would be enticed to open shops in our locality as they are committed to the new £85 million refurb in eastbourne some 6 miles away .

**Environment.**

The huge investment required for lakes .parks .golf club .country sports facilities leisure activities ,cycling .walking ,hotels and Spa etc would be required to make the added enhancement to cover up from the vast and unattractive building of large estates . I believe this is unobtainable .

WDC need to commission an Air Quality Survey now and a full environmental survey to look at the impact of the options before any further plans are discussed .

On behalf of the residents that I represent I wish it to be stated that "Our Quality of Life is Impaired and our Daily living Compromised ".The WLP does not recognise the Fundementaly unsound and unqualified proposals will have on our Town and Current Residents and future generations.

## **Infrastructure – Virginia Browne**

The Wealden District Issues and Options document is merely a microcosm of the macrocosm. It chooses to ignore issues for example climate change and negative environmental impacts. The low Weald has a wealth of farming options. Looking at predictions of world population growth and food production the argument for retaining farmland is a strong one.

Hailsham is already behind what it needs in terms of schools, roads, medical and sports facilities. The rationale of building a concentrated spate of houses in the hopes of getting improvements to the A27 and A22 is naive. Again Wealden are using a term such as 'lobbying' to suggest the money required for improvements will be made available. Clearly government funding which the relevant stakeholders require to make the required infrastructure

None of the Options presented by Wealden District Council are acceptable. Given the plans are so grand in numbers and length of time Wealden should be employing Town Planners and other experts to work with Hailsham Town Council to create suitable and realistic plans.

## Wealden Local Plan Sustainability Appraisal Critique

Paul Soane November 2015

Introduction:

A sustainability appraisal is defined as an iterative process that identifies and reports **on all the likely significant effects of the plan** and the extent to which implementation of the plan will achieve the social, environmental and economic objectives by which sustainable development can be defined.

By doing so, it can help ensure that the proposals in the plan are the most appropriate, given the assessment of reasonable alternatives.

It is also used to test the evidence underpinning the plan and demonstrate how the tests of **soundness** have been met.

The Government through the *Planning Practice Guidance* website, lays out a detailed Sustainability Appraisal Process and its relationship with the preparation of the local plan.

In compiling this critique, I have compared the SA for the Wealden local plan with the following:

1. Sustainability Appraisal WDC Core Strategy 2005
2. SA South East regional spatial strategy 2009
3. Lewes DC SA 2011
4. East Hertfordshire DC SA 2010
5. Epping Forest DC SA 2010
6. Planning for Housing UK Government briefing paper June 2015
7. The role of sustainability appraisal, Planning Advisory Service July 2013

The comparisons have in part informed my observations, and as with any discussion of sustainability, my interpretation may be considered subjective, irrelevant and out of context.....much the same as any other.

There in, lay the problem. Even the NPPF fails to offer anything other than a loose, ambiguous and weasley collection of pious phrases that can mean anything to anybody.

My observations and comments on the Sustainability Appraisal are as follows:

- The NPPF clearly states that the SA (sustainability appraisal) should inform and be consulted upon at every stage of the plan preparation process. WDC states that the SA scoping report went out for **public consultation** May / June 2015. How was this consultation announced and publicised, and who was invited to comment?
- WDC received 9 comments on the scoping report. How many were from statutory key stakeholders as opposed to members of the general public?
- What difference would have been made to the sustainability objectives covered in the sustainability framework if, a broader consultation on scoping had taken place?
- The SA Framework objectives and questions should be designed to tease out all the likely significant effects across a balanced spectrum of objectives on the Environmental, Economic and social impacts of the emerging plan. The framework is biased towards environmental protection of the Ashdown Forest and the AONB. Is this bias a political or planning motivation?
- What is the net environmental loss associated with the preferred South Weald development option on the Pevensey levels.
- The 18 SA objectives contained within the framework comprise a narrow definition of sustainability that has allowed no devolution to local communities to influence a distinctive vision of the places in which they would want to live.
- The objectives are 'cherry picked' to promote the preferred option for testing, and to

conform to a government definition of sustainability that would ease the passage through inspection and avoid future appeals and legal challenge.

- It is a tick box, wholly subjective exercise that lacks scientific rigour and substantive evidence. For example, where is the air quality assessment associated with increase in traffic density in the South Weald or indeed any traffic flow data.
- There should be a non technical summary provided of the report.
- Where a key effect is identified it is brushed aside with generalisations, non specifics and no clear recommendations. The solution to waste water treatment in Hailsham and the impact on the Pevensy levels is one example.
- The appraisal fails to identify and evaluate which aspects of social and economic benefits matter for peoples quality of life. One of the comparison appraisals has an objective that focuses on community happiness and human well being.
- There is no evaluation of the liveability or bearability of the impacts of the planned urban expansion in the South Weald.
- What are the social consequences of providing 35% affordable housing in an urban extension of the magnitude proposed for Hailsham?
- East Hertfordshire, as a component of it's appraisal commissioned a separate Health impact assessment of the impact from it's 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.
- There is no social impact identification in the plan emanating from the equality, health and social care needs of a growing ageing population across the district..
- In the SA section devoted to the appraisal of the plan on Hailsham and it's environs, there is no reference to the potential for deteriorating air quality despite the scale of expansion. Why not?
- There is no objective around integrated transport or sustainable methods of transport, out commuting, prevention or mitigation of congestion in the South Weald. However, diverting traffic from the Ashdown Forest is a priority?
- Why are the Pevensy levels not afforded comparable concern?
- What has been identified to deal with the social equity issues and disparities between the most affluent communities and the most deprived. How does the plan benefit the most deprived areas of the district, aside from a vague notion of providing employment opportunities?
- The settlement hierachy has been designated on the current supply of services and amenities. There is no urban capacity assessment to measure the ability of these settlements deemed sustainable to accommodate the size of the planned allocations.
- There is no assessment of the capacity of the existing infrastructure or the identification of specific needs to be planned for.
- There is no acknowledgement of the funding shortfall from the 2005 non statutory plan and the core strategy back logged infrastructure requirement. However, WDC is already warning of funding problems for infrastructure provision from the emerging Wealden plan.
- There is no mention of how the likely failure of critical infrastructure to follow housing development will be felt or compensated for. The WDC track record of failure to provide infrastructure is indicative of this outcome. An infrastructure delivery road map sounds strategically catchy but, provides little confidence of delivery. Housing numbers will be delivered whether the predicated infrastructure is delivered or not.
- 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. How viable is this element of the plan?
- How does WDC propose to deliver the employment expansion indicated in the plan, and how do you justify economic growth at twice the forecast level of our neighbouring districts?
- The settlement hierachy has been based on the settlements in there current form. There has been no attempt to envision what they may have the potential to become.

- There is scarce evidence of any creative ways in which policies might achieve social and economic growth, whilst affording environmental protection in the High Weald.
- What consideration has been given to the likely oversupply of housing in the South Weald and the irreversible consequences of development incursions onto greenfield sites.
- What will be the consequences of over supply on house prices and the trapping of families in property that they cannot afford to sell?
- The impact of limited building in the High Weald will lead to scarcity of supply, ever increasing land prices and cost of homes. What social impacts have been considered and mitigated against from this policy?
- How will economic growth be provided for in the High Weald and in particular the towns of Crowborough and Uckfield?
- ESCC is already forecasting long term over subscription to most of it's schools. How will the necessary additional capacity be provided that ensures the parental choice of schools advocated by central government across the range of age provision, whilst ensuring that educational attainment continues to increase?
- There is no indication that the substantial number of currently vacant homes will be prioritised and used to mitigate some of the OAHN.
- Concerns to reduce crime and ensure safe communities were given consideration in the Core Strategy SA objectives. Despite the scale of proposed urban expansion in the Wealden plan this is given no regard in the current SA. Why not?
- The alternative options for housing distribution are limited in scope and poorly appraised. There is a more convincing argument for an equitable distribution on economic and social logic grounds.
- What consideration has been given to a new settlement across the boundaries of Lewes DC and WDC?
- The preferred option is justified in Wealden's words as being 'quicker and easier' to deliver than alternative distribution options. Can this justification stand scrutiny under the test of soundness?

I would like to propose a small amendment to our initial paragraph, that I believe will add considerable weight and clarity to our meaning.  
My proposal is as follows:

HTC will work constructively with all the other stakeholders in implementing the Wealden Local Plan; **only** taking the proportional housing **which will be supported by the requisite** infrastructure **capacity** which reflects the priorities of the town.

Over and above the points I make in my critique, I would add the following for consideration:

1. What urban capacity assessment has been carried out that ascertains that Hailsham can accommodate the scale of development proposed without negatively affecting (further) the quality of life experienced by Hailsham residents?
2. The socio / economic data for Wealden clearly illustrates an already significant level of economic deprivation in Hailsham in comparison to Wealden averages. How does the preferred option address this?

3. What social impacts will be visited on Hailsham in relation to the inward migratory affects of such a large urban expansion plan and the Wealden policy of requiring 35% social housing provision on any development above 10 units.
4. What evidence do you have that supports a proposal of edge of town retail development providing a regenerative effect on the high street?
5. In what way does an edge of town (Diplocks) retail park, promote connectivity to the current high street?
6. Where is the 'visionary', creative and analytically derived plan for Hailsham town centre, that clearly illustrates a compelling reason for optimism?

Nick Collinson

**Suggested Topics Headings for debate at NDP Committee - 9<sup>th</sup> December 15**

**Medical Services**

- Currently no provision for minor injuries or A&E
- Social Care Provision
- Nearest Maternity approx. 20 miles away
- Critical need exists to attract GP's and Specialist Doctors

**Conservation Area**

- Farmers Market regeneration
- Historic building protection
- Specialist consultants

**Environment**

- Parks and open spaces
- Woodland protection
- Wildlife protection

**Transport - Road**

- A27 Upgrade
- Ersham Road/South Road Junction
- Battle Road/High street Junction
- Western Road / South road Junction
- Hempstead Lane to Leap Cross road upgrade (including roundabout)

**Transport - Public**

- Rail – No rail provision, options such as Monorail / Tram or Light Railway need investigating
- Polegate Parkway station 'suggestion' could provide a train station within 4 miles of town centre
- Bus – Proposals for the Quality bus corridor are flawed, a complete rethink required

**Education**

- Already short of spaces – 9,000 houses would need substantial primary and secondary school places
- University – could Hailsham provide land for, and attract a higher education campus facility?
- Pre school?

**Sports and Leisure**

- Already some 15 acres short of playing fields and facilities, there is now high demand for regular sports fields in addition to extended sports facilities to include astro-turf pitches for all year round sports as well as indoor winter training facilities etc.
- Specialist Sports Facilities

**Economic Plan**

- Rural – investment into farming community (EU?) to protect the remaining farms and farmland.
- Tourism – Provision of a 'large scale tourist attraction' could feed into employment and infrastructure requirements – Centre Parcs / Eden Project or similar? – not an Alton Towers!
- Business/Manufacturing – Funding (LEP / EU?) for encouraging resettlement of existing larger employers to the new industrial/business parks

- Employment – EU/LEP funding for establishing new business parks (50,000 – 60,000 M<sup>2</sup> – approx. would be required)
- Retail – Significant compulsory purchase of property to make way for new retail space to facilitate an extension of current town centre

#### **Social Infrastructure**

- 5x Community Halls (1x 575 M<sup>2</sup> facility recommended per 2000 houses or 4000 population)
- Full (not minimum requirements) for disabled facilities in all new community halls
- Crematorium and/or Cemetery
- Broadband – already weak provision!
- Mobile telephone masts

#### **Wealden Design Guide**

- Tighter specification of materials used, general build density and overall design
- Better enforcement
- More rigid planning rules

#### **Infrastructure Financing**

- Aside from the developer contributions ...
- Major Road Infrastructure financing to be lobbied for from central government
- NHS / CCG need to come forward for hospital/polyclinic etc. – and contribute towards sports!
- Education Authority (whoever that will be in the future!) need to wake up!
- Sport and Tourism – could be funded to a large degree by private finance?

## Suggested Draft Response Outline - 2<sup>nd</sup> December 15

**Hailsham Town Council is willing to work positively with Wealden District Council on its preferred option for testing as outlined in the Wealden Local Plan, however Hailsham Town Council 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.**

**In the following paragraphs, an outline of the areas of concern that will need to be addressed exhaustively, evidenced correctly and both the feasibility and affordability demonstrated before Hailsham Town Council can be convinced to fully support the plan.**

**Should the required infrastructure feasibility and affordability results come up short then so should the housing numbers come up proportionately short.**

### Education

It is widely accepted that for every 1000 homes one new primary school is required, this means the equivalent of 9 new primary and then a further secondary school will be required. Given the backdrop of the shortage of provision in Hailsham already, and the difficulty in attracting teachers to the current schools being seen now. How will this be addressed?

### Medical Services

Hailsham will be, by some distance, the largest inland town in East Sussex (as it is already), yet currently has no minor injuries unit or hospital. Coupled with the backdrop of the health provision the CCG currently offers residents are already having to travel to Hastings and Brighton (and further afield) to get even basic or regular treatment such as maternity etc. How will this be addressed?

### Road Transport (including Parking)

At peak times the town suffers from a distinct slowdown, if not halt, in traffic movement. Similarly there is a huge pressure on the car parking facilities within the town. Whilst the MASHH project has identified some 'game changers' the proposed plan brings an entirely different level to the requirements. What assurances can be sought that the impact on traffic flow can be negated (if not an actual delivery of improvements in this area?)  
Then something about parking...

### Public Transport

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. Schemes such as a 'light railway' or 'monorail' service have been floated or voiced? What is the feasibility, and best path to delivery of such a scheme?

### Conservation Area

The proposed changes to the conservation areas give rise to some concerns...

### Employment

There is scepticism 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 More detail required.

### **Sports and Leisure**

Hailsham is some 15 acres short of sports facilities now, and will be 30 acres + short by 2037 if these plans are adopted, yet there is no detail around allocation of land for this purpose. It is generally accepted that funding for this type of facility is outside the remit of local authorities, however without land allocation the mountain of achieving this required fund raising in the private sector is impossible.

### **Tourism**

Similar to sports and leisure, the proposal for a 'large scale tourist attraction' has no substance, nor does it have land allocation. A proposal if we are talking about an 'Eden Project' scale attraction, then this will need (and could partially provide funding for) the costs for a light railway or monorail service? It could also make such a service a sustainable one for an operational point of view.

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

## **(Hellingly Parish Council – Draft/proposed)** **Wealden Local Plan Response**

Wealden Local Plan Issues Options and Recommendations September 2015

### **Question 1 page 22**

#### **Presumption in Favour of Sustainable Development**

Do you agree or disagree with the inclusion of the Presumption in Favour of Sustainable Development within the Local Plan?

**Yes - agree**

### **Question 2 page 59**

## **Strategic Housing Strategy**

Do you agree or disagree with the Settlement Hierarchy, and the preferred options for housing together with the associated plan period?

**Agree** with the principle of a settlement hierarchy but not with the suggested groupings. There is a significant difference in accessibility of those settlements described as Sustainable between settlements such as Buxted, Crowborough, Polegate, Uckfield and Wadhurst that have direct rail links and are therefore very accessible and those described as having good accessibility. Equally the level of local services although referred to as good differs significantly between settlements such as the main towns where there is a range of convenience and some comparative shopping (e.g. Heathfield and Forest Row) and those where the convenience shopping is more limited and the comparative shopping virtually non-existent (e.g. Horam, Herstmonceux, Frant, Groombridge, and Hartfield). Do not agree that all within the same group are “sustainable”.

Lower Dicker, Lower Horsebridge and Hellingly are all classified as “Local Settlements” “not considered sustainable for planning purposes” where “appropriate development” may be “acceptable as an exception”. The arbitrary allocation of numbers of new dwellings is not justified in the absence of a detailed assessment of potential sites which should only be evaluated on a site by site basis.

Do not agree with the preferred options for housing. Consider that the proposed level of housing and the rate of build out are too great. As such they are likely to be undeliverable over the proposed period of the plan.

Disagree with preferred options 2 and 3 for testing.

In particular both options place undue reliance upon significant development in Hailsham. Should this prove undeliverable for whatever reason (and the document lists various potential difficulties) the Council would be unable to meet the housing need. Whilst accepting that the environmental constraints, that affect much of the District, mean that the emphasis will be to develop in the South of the District where the constraints are less restrictive, the Council should be exploring the possibility of a more dispersed pattern of development as well as the possibility of one or more stand alone new settlements in more sustainable locations that have ready access to a rail link.

Option 3 would appear to be the most vulnerable to failure to deliver. In particular, the proposal to double the size of the town without any indication of the extent of the land required to accommodate such a level of growth; or of the ability of the existing infrastructure to service such growth; or of the ability to expand the existing retail and employment space to the extent necessary; or of the availability of the investment required to upgrade the existing or provide the new infrastructure.

Option 3 carries high risk of failure of the Plan particularly in concentrating the majority of the growth for the District in one location which

- a) will be dependent upon significant investment in major road improvements;
- b) is likely to result in an increase in traffic crossing the Ashdown Forest;
- c) is likely to accentuate flooding around Hailsham and Eastbourne; and

- d) will require significant investment in new and upgraded infrastructure which is unlikely to be funded from the new housing development.

In concentrating so much of the development in one location the opportunity is being missed of

- a) addressing the acute housing need in other parts of the District particularly in the North where the housing need is greatest;
- b) of regenerating many of the District's smaller communities that are in need of additional low cost housing; and
- c) of taking advantage of the potential that exists to utilise rail transport and reduce car dependency and therefore pollution should the Uckfield - Lewes rail line reopen

Option 3 places too great a reliance upon delivery of a large urban extension at Hailsham and is conditional upon improvements to the strategic road network (the A27) upon which there is no certainty. In the event that this proves undeliverable for whatever reason the majority of the housing would fail leaving the plan undeliverable.

### **Question 3 page 66**

#### **Strategic Economic Strategy**

Do you agree or disagree with the preferred Strategic Economic approach?

**Disagree.** Too much reliance is placed upon

- a) the A22 corridor when there is no evidence to suggest that there is or will be a demand for growth in this area - previous incarnations for growth - "the Eastbourne Hailsham Economic Triangle" - proved a spectacular failure and there is no reason to suppose a different outcome for the "corridor", and
- b) upon employment and retail growth in Hailsham. However insufficient space is being made available in the centre of Hailsham for either retail or employment uses.

The market will decide the ideal location for growth which is normally in locations with good transport infrastructure. If the A22 corridor and Hailsham was suitable it would have attracted growth in the past which it has not. There is no certainty of attracting major employment or "engineering clusters" and no evidence to support the belief that this will occur or that there exists the ability to develop skills within the local workforce. There is no certainty of the major infrastructure improvements and investment of public monies required to make this happen.

Additional economic activity along the A22 will accentuate the present problems on the Ashdown Forest

### **Question 4 page 68**

#### **Business Areas**

Do you agree or disagree with the preferred option for testing for business areas?

In part but it is important to protect business land allocations in order to provide local employment opportunities as part of new housing developments

### **Question 5 page 70**

#### **Strategic Culture and Leisure (Including a Sports Park)**

Do you agree or disagree with the Preferred Option for testing for culture and leisure (Including a Sports Park)?

**Agree**

### **Question 6 page 74**

#### **Gypsy and Traveller Housing Provision**

Do you agree or disagree with the preferred option for testing for Gypsy and Traveller housing provision?

### **Question 7 page 75**

#### **Vision**

Do you agree or disagree with the vision?

There is an element of “*motherhood and apple pie*” in the vision with which few would disagree. We however question whether it is deliverable. It is highly aspirational to assume an attractive and prosperous part of the south east with expanding retail opportunity attracting national chains and a growing hi-tech sector providing good quality jobs and opportunities for local people to improve skills. The opposite side of the aspiration, and the risk, is that in the absence of significant investment in infrastructure we will create a huge housing dormitory resulting in poor quality cramped developments lacking in access to basic facilities and services and leading to a significant increase in out commuting with resultant damage to the environment.

The presently largely undeveloped environment and landscape of the Low Weald that provides the setting for the South Downs national park could suffer irreparable harm from sporadic ribbon development focused along the “A22 corridor” generating a proliferation of new access points, advertising signage and all the paraphernalia associated with unplanned growth and low tech businesses seeking cheap accommodation.

We do not believe that the vision, in particular the suggested road and rail improvements, is realistic in the absence of a deliverable and costed plan in which the amount, timing and source of the necessary funding is clearly identified and a commitment to delivery obtained before the grant of planning consents.

### **Question 8 page 80**

#### **Brownfield Land**

Do you agree or disagree with the preferred option for testing for brownfield land?  
Agree with reservation. Priority should be given to retaining previously used employment land for employment uses so far as this is consistent with Government policy. Not all previously used employment land is suitable for residential development in view of its location, the uses of neighbouring property, its access to services and the quality of any resultant residential development. The option for testing should be extended to include the objectives in paragraph 3 of option 13.

### **Question 9 page 85**

#### **Development Boundaries**

Do you agree or disagree with the preferred option approach for testing for development boundaries  
Broadly agree

### **Question 10 page 90**

#### **Settlements Without Development Boundaries**

Do you agree or disagree with the preferred option for testing for settlements without development boundaries?

### **Question 11 page 121**

#### **Town and Village Centre Hierarchy**

Do you agree or disagree with the preferred option for testing regarding the Town and Village Centre Hierarchy?

### **Question 12 page 131**

#### **Uckfield Town Centre**

Do you agree or disagree with the preferred option for testing in relation to Uckfield Town Centre.

### **Question 13 page 134**

#### **Hailsham Town Centre**

Do you agree or disagree with the preferred option for testing in relation to Hailsham Town Centre?

#### **Disagree.**

Effective redevelopment of the town centre is an essential element in supporting any proposed housing growth. The town centre is severely constrained by the existence of the Cuckoo trail and the housing developments that surround the existing centre. There exists limited opportunity (which should be tested) to include additional areas such as the cattle market and the police and fire stations for potential retail development. Also the potential to redevelop the dated retail centres of Vicarage Fields and the Quintins incorporating the respective adjacent parking. However, any town centre redevelopment must protect, and increase existing parking space, and must address the road infrastructure making provision for through traffic as well as destination traffic. The provision of an eastern relief road from the A271 to the Bolney roundabout should be tested.

The proposal to extend the town centre along South Road to include the eastern part of the Diplocks Industrial Estate is likely to result in two distinct and physically separate retail areas. The ease of access to the Diplocks without negotiating the present town centre is likely to detract from the ability to improve the existing retail offer in the present town centre with major new investment and retailers preferring to take space in the Diplocks leading to the long term decline of the High Street.

Additionally, the present town centre cannot expand without addressing the highways and transport infrastructure. Traffic in the town is already often at a standstill and there is no capacity for greater traffic movements utilising the existing roads and junctions

Any proposals for redevelopment must include additional town centre parking.

### **Question 14 page 137**

#### **Crowborough Town Centre**

Do you agree or disagree with the preferred option for testing in relation to Crowborough Town Centre?

### **Question 15 page 140**

#### **Heathfield Town Centre**

Do you agree or disagree with the preferred option for testing in relation to Heathfield Town Centre?

### **Question 16 page 142**

#### **Polegate Town Centre**

Do you agree or disagree with the preferred option for testing in relation to Polegate Town Centre?

### **Question 17 page 145**

#### **Wadhurst Village Centre**

Do you agree or disagree with the preferred option for testing in relation to Wadhurst Village Centre?

### **Question 18 page 149**

#### **Forest Row Village Centre**

Do you agree or disagree with the preferred option for testing in relation to Forest Row Village Centre?

### **Question 19 page 151**

#### **Restricting Change of Use within Town Centres**

Do you agree or disagree the preferred option for testing in relation to restricting changes of use within Town Centres?

### **Question 20 page 152**

#### **Increasing the range and size of units within Wealden's Town and Village centres.**

Do you agree or disagree with the preferred option for testing in relation to increasing the range and size of units within Wealden's Town and Village Centres?

### Question 21 page 158

#### Retail Allocation - Uckfield Town Centre

Do you agree or disagree with the preferred option for testing for the allocation of additional retail provision in Uckfield Town Centre?

### Question 22 page 165

#### Retail Allocation - Hailsham Town Centre

Do you agree or disagree with the preferred option for testing for the allocation of additional retail provision in Hailsham Town Centre?

We **disagree**.

The preferred option for testing omits the potential of testing for redevelopment of the livestock market site. The location of the property is included within the town centre as shown on Map 29. Its proximity and ease of pedestrian access from the High Street and George Street makes it a more sustainable location for additional retail space and redevelopment unlike the proposed allocation of part of the Diplocks Industrial estate, and would consolidate and not fragment the town centre.

Considerable work was undertaken by town centre planning specialists (Tibbalds) and was published as part of the Hailsham and Hellingly Masterplan 2009. Existing and future town centre sites were evaluated and their capacity to provide additional retail space was assessed. This work should be revisited and updated as part of the planning of the future of the town centre with emphasis upon testing for the potential to redevelop and expand the existing retail developments (Vicarage Fields and the Quintins), and to explore the options of redeveloping the sites of the fire and police stations, the livestock market, and the BT exchange and Seaforth surgery in Vicarage Lane.

We do not agree with the proposals for the expansion of the retail area to include the Diplocks Industrial estate for the reasons given above and in response to question 13. In addition, this would involve the loss of employment space in a convenient town centre location for which there is otherwise inadequate provision.

We do not believe the town can be successfully expanded until adequate proposals to address the existing Infrastructure issues, particularly transport, have been implemented.

### Question 23 page 173

#### Hailsham, Hellingly, Polegate and Arlington

Do you agree or disagree with the preferred option for testing for Hailsham, Hellingly, Polegate and Arlington?

We **strongly disagree**. For the reasons given in answer to earlier questions (in particular question 2) we disagree with the proposal to locate the majority of the growth in the District in Hailsham, Hellingly, Polegate and Arlington.

It is inconceivable that the already constrained Hailsham town infrastructure will be able to accommodate the expansion. Not only will the existing physical infrastructure (the sewers, drains, pipes, wires and cables) require replacement and/or significant

upgrading but any further growth in the town and its immediate surrounds will necessitate substantial investment in additional new physical infrastructure.

In addition, the social infrastructure identified as part of the Wealden Non Statutory Plan and The Wealden Core Strategy Local Plan (the school and nursery places the health centre and the additional recreational and cultural facilities) have not been delivered resulting in a substantial shortfall in what is required to meet the needs of the already expanded population.

There is a predicted shortfall in the proposed CIL contributions and contributions from further development will not cover the cost involved. The potential funding deficit poses questions as to the deliverability of the proposed housing.

The area suffers from a shortage of water and use is already restricted in a dry summer.

There is no current capacity in the existing foul water drains or in the existing sewage treatment plants which already causes regular problems in Upper Dicker and Lower Horsebridge.

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).

Turning to the specific area of search, none of the six sectors provide a satisfactory area for search - all have their own specific drawbacks in addition to the general problems referred to above

- **Hailsham North West** – an area of high groundwater levels much of which is within the Cuckmere flood plain, where there are existing foul and surface water drainage problems. Would elongate the development of the town and close the gap with Hellingly village. Remote from town centre services and likely to increase car usage.
- **Hailsham North** – would elongate the developed area of the town resulting in residential development incusing on Greenfield agricultural land in open countryside and closing the gap between Hailsham and Hellingly. Remote from town centre services and likely to increase car usage.
- **Hailsham East** – low lying land drains directly to the Levels constrained by the odour zone of the Hailsham North Waste water treatment works. Would increase traffic on Battle Road and through the town centre.
- **Hailsham South East** – low lying draining to the Levels with poor access to the town centre. Would require significant investment in new access roads.
- **Hailsham South** – difficult topography – poor access – closes the gap to Polegate.
- **Hailsham West** – cut off from Hailsham by the dual carriageway A22 Hailsham By-pass. Low lying land draining to the Cuckmere. Environmental constraints of the Cuckmere flood plain, ancient woodland and poor access. Without significant investment in new and improved infrastructure is likely to result in a poorly accessed stand alone settlement.

In view of the absence of a direct rail connection significant further development of Hailsham will result in additional car usage. A more sustainable option for future growth in the District would be to concentrate development in areas where there are good rail links to London and the coast that, if correctly utilised, would offer a more sustainable approach to town planning.

**Question 24 page 178**

**Polegate and Willingdon**

Do you agree or disagree with the preferred option for testing for Polegate and Willingdon?

**Question 25 page 181**

**Heathfield**

Do you agree or disagree with the preferred option for testing for Heathfield?

**Question 26 page 184**

**Crowborough**

Do you agree or disagree with the preferred option for testing for Crowborough?

**Question 27 page 187**

**Parish of Frant on the Edge of Tunbridge Wells**

Do you agree or disagree with the preferred option for testing for Edge of Tunbridge Wells in the Parish of Frant?

**Question 28 page 190**

**Stone Cross**

Do you agree or disagree with the preferred option for testing for Stone Cross?

**Question 29 page 193**

**Westham**

Do you agree or disagree with the preferred option for testing for Westham?

**Question 30 page 196**

**Herstmonceux**

Do you agree or disagree with the preferred option for testing for Herstmonceux?

**Question 31 page 200**

**Ninfield**

Do you agree or disagree with the preferred option for testing for Ninfield?

**Question 32 page 204**

**East Hoathly**

Do you agree or disagree with the preferred option for testing for East Hoathly?

**Question 33 page 207**

**Horam**

Do you agree or disagree with the preferred option for testing for Horam?

### Question 34 page 210

#### Mayfield

Do you agree or disagree with the preferred option for testing for Mayfield?

### Question 35 page 214

#### Wadhurst

Do you agree or disagree with the preferred option for testing for Wadhurst housing allocations?

### Question 35 page 228

#### Landscape

Do you agree or disagree with the preferred options for testing for Landscape?

**Broadly agree** but would wish to see option 37 extended to include consideration of a policy to protect, conserve, and enhance the attractive landscape of the Low Weald

### Question 36 p245

#### Development in the Countryside

Do you agree or disagree with the preferred options for testing for Development within the Countryside?

### Question 37 page 269

#### Design and Location of Development

Do you agree or disagree with the preferred options for testing for design and location of development?

**Agree** although much of what has gone before in this document contradicts the policy guidance for testing

### Question 38 page 278

#### Historic Environment

Do you agree or disagree with the preferred options for the Historic Environment?

### Question 39 page 298

#### Natural Environment and Climate Change

Do you agree or disagree with the preferred options for testing for the Natural Environment and Climate Change?

### Question 40 page 303

#### Affordable Housing

Do you agree or disagree with the preferred options for testing regarding affordable housing?

**Disagree.** The rural exceptions policy should be drawn to facilitate the delivery of affordable dwellings for local inhabitants in need, in rural parishes where other policies in the plan do not permit housing. The policy should not be used as a means of delivering affordable dwellings in locations where the need is already being addressed through housing allocations in the plan and where additional housing is used to meet the district wide housing need

### Question 41 page 310

## **Housing Policy**

Do you agree with the preferred options for testing for housing?

### Question 42 page 316

#### **Shopping Policies Outside Town and Village Boundaries**

Do you agree or disagree with the preferred options for testing in relation to Shopping Policies Outside Town and Village Boundaries?

### Question 43 page 326

#### **Infrastructure Provision**

Do you agree or disagree with the preferred options for testing for Infrastructure?

**Broadly in agreement** but would suggest that social infrastructure should be extended to include retail and employment uses both of which are essential for the wellbeing of residents of the District.

### Question 44 page 327

#### **Contents of the Plan**

Do you agree or disagree with the proposed scope of the Plan? Do you consider that the Plan should contain other subject areas or policies?

### Question 45 page 327

#### **Hailsham Area Action Plan**

Do you agree or disagree with the scope of the Hailsham Area Action Plan? Should the HAAP cover other subject areas or policies?

Cannot access the HAAP. Would suggest however that representatives of Hellingly Parish should form part of the Steering Group.

### Question 46 page 327

#### **Sustainability Appraisal**

Do you agree or disagree with the Sustainability Appraisal that accompanies the document?

## **(Hellingly Parish Council – Draft/proposed)**

Wealden Local Plan  
Conservation Areas

Consultation Response  
From  
Hellingly Parish Council

### **Question 1 – Existing Conservation Areas**

*This response relates to Hellingly Conservation Area (HLY)*

- A. Yes, we agree with the recommendations and all the Preferred Options for Testing.
- B. Yes, we agree with the recommendations but not with the exclusion from Area 6 of :-
  - I. The Infants School opened in 1913 and one of the 8 buildings in and around Hellingly described in *The Buildings of England: East Sussex* (p 476) as a 'busy but not unsuccessful composition'.
  - II. Lobdens, an 18c house listed Grade II.
  - III. The Village Hall erected in 1914-15.

These three meet criteria 1.1 and especially 1.2 for the Selection of Areas and criteria 2.3 for the Selection of Boundaries. They demonstrate a significant relationship with the village over the last Century. Note that the Village Recreation Ground was located at the rear of the Village Hall until 1953 when the land was required for highway purposes.

- C. Not applicable.
- D. No – See B above

### **Question 3 – Settlements Not Meeting Agreed Criteria**

*This response relates to Lower Horsebridge (NRA 23)*

- A. No, we do not agree with the recommendation.
- B. We disagree with the recommendation and consider that the area between the Old Sweetshop and Back Lane, plus the Kings Head on the south side of the A271, meet criteria 1.1 and 1.2 for the Selection of Areas and criteria 2.1 and 2.2 for the Selection of Boundaries for the following reasons:-

Lower Horsebridge owes its origin to the development of the highway system in the early 18<sup>th</sup> Century. It was situated at the junction of two turnpike roads established after the passing of the first Turnpike Act affecting East Sussex in 1696. The southward turnpike followed the present London Road to Hailsham and then Ersham Road to Langney and Eastbourne. The northward turnpike followed Back Lane, skirted Dicker Common and then passed through Chalvington to Lewes, with a branch up to Uckfield. There used to be two toll gates, one on each road. The Tollhouse, now vacant, is immediately opposite the Kings Head.

The Kings Head is an old coaching inn with a more recent front where coaches would stop to rest or change horses (at one time it had stables for a large number of horses) and where passengers could have refreshments or accommodation. Written accounts of the hostelry's use and facilities exist from 1754 (Turnpike Trust) and 1788 (Lord Torrington). Gradually a small settlement grew to serve the passing traffic and local needs. Busbridge Cottage (at the junction of Back Lane and A271) and Croft Cottage (next to the White Hart) both date from the 18<sup>th</sup> Century. Olive House and the former antiques shop at the Cottage (both opposite the Kings Head) date from the early 19<sup>th</sup> Century. All four are Grade II listed.

Other non-listed but not unattractive buildings dating from the 19<sup>th</sup> Century are the White Hart public house, Burleigh Cottage (Back Lane), St Anne's Cottage (North Street, r/o The Cottage) and the terrace comprising Cherries, Hope Cottage and the Old Sweetshop Cottage (adjacent to Olive House).

Of the 20 buildings in the area identified above as being potentially suitable for conservation area designation, 8 are of modern 20<sup>th</sup> Century construction. These

are however mostly set back from the road and not prominent in the street scene which derives its character and appearance largely from the other 18<sup>th</sup> and 19<sup>th</sup> Century buildings (especially the two large public houses) which abut the highway.

The former 'Horse Pond' where horses used to be taken to drink and be cooled down, on the south side of the A271, has been filled in to provide a series of car parks. These do little to enhance the street scene. If included within the conservation area, the Parish Council would seek to promote their enhancement both directly and through the emerging Neighbourhood Plan.

#### **Question 46 Sustainability Appraisal**

*"To test the provision of around 4,000 dwellings in the North, South East and Southern Sectors adjoining Hailsham Town, and to include infill development/redevelopment of the existing urban area the exact amount of which will be provided through a capacity study. This will include the provision of the remaining 418 homes to the East of Hailsham identified in the Core Strategy. This will however, not allow any further incursion towards the Pevensy Levels in this Sector.*

*The first choice to provide the remaining 5,380 dwellings is the provision of an urban extension on land at West Hailsham with the re-routing of the A22 and the down grading of the existing A22. However it is acknowledged that there are significant issues with regards to delivery and the second choice is the development within South Hailsham in the Parish of Hailsham and Polegate with the third choice of land at west Polegate.*

*The option of 9,380 dwellings is predicated on the improvements to the A27, or another alternative, and the delivery of other road and social infrastructure as well as the improved waste water treatment in Hailsham"*

The preferred option for testing has not been clearly identified the exact option depends on which site is chosen to deliver the 5,380 dwellings.

The latest DfT viability assessment for improvements has stated that any improvements to the A27 do not represent "Value for Money". To put in a dual carriageway the project cost is over £400M, rerouting the A22 would cost approx £50M and as it is not a major trunk road the burden of cost will be placed on ESCC.

	<b>Sustainability Objectives</b>
--	----------------------------------

	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18
<b>Preferred Option 24 for Testing (P.242)</b>	+	?	o	o	o	o	?	o	+	?	o	?	+	o	o	+	+	+
<b>Corrected Preferred Option</b>	-	-	?	o	o	o	-	-	?	-	o	-	-	-	-	o	o	?

**SA1 To protect and enhance biodiversity and geodiversity within the District**

As there are little Brownfield sites within these areas. The level of expansion proposed would be on green fields. This assessment lacks any sort of credibility.

**SA2 Conserve and enhance the District's countryside, landscape, historic environments and cultural assets**

I fail to see how building houses over green fields conserves and enhances the Districts countryside and landscape.

**SA3 Where appropriate enhance and provide access to the District's countryside, landscape, historic environments and cultural assets for residents and visitors**

This is unknown as it depends on how the option would be implemented. Access to all areas from Hailsham is an issue as the highway network in the locality is not fit for such a large increase that is proposed. Building a development right next to ancient woodland may improve the access to that particular asset in the area but this doesn't support SA1

**SA7 Reduce the risk of flooding and the resulting damage to public wellbeing, the economy and the environment.**

It incorrectly states on page 248 in Sustainability Appraisal that "The Preferred Option includes sectors which are close to flood risk areas but not within flood risk areas. According to the Environment Agency there are large parts of South and South East in particular fall into flood zone 2 and in parts fall into flood zone 3

**SA8 Reduce air pollution and ensure local air quality continues to improve; promote energy efficiency measures and encourage the use of renewable energy**

The matrix has been assessed as neutral, through the sheer level of development proposed there will be an impact on local air quality. The only choice transport in Hailsham is a bus or to use a private car. For this reason the matrix has been changed to negative. I note on the Sustainability Appraisal for other towns/villages this issue has been identified as questionable.

**SA9 Ensure the best use of previously developed land and existing buildings**

The Sustainability Appraisal pg 248 states that "the Preferred Option is likely to have positive effects on SA9 as it seeks to provide infill/redevelopment opportunities within the existing urban area of Hailsham. The extent of the positive effects will be dependent on the urban capacity study which the Preferred Option makes provision for. Notwithstanding this, the scale of development proposed here will require significant Greenfield land development also". Little of the development that is proposed will not be on Brownfield so although there could be an opportunity to utilise previously developed land the opportunities for this are slim. For it to have been graded as a positive could be construed as misleading.

**SA10 Achieve a pattern of development which minimises journey lengths and encourages the use of more sustainable transports modes (walking, cycling and public transport)**

Significant road and social infrastructure improvements will be required to accommodate this scale of development and going on past history for Hailsham this has been severely lacking. For this reason I have marked this as a negative, it could be argued that this could be changed to unknown but the record of infrastructure delivery is poor to say the least.

***SA12 Improve access to services; facilities; the countryside and open spaces***

It correctly states that the effects are assessed as uncertain at this time. It also states that there are significant issues with the delivery of the large urban extension and the re-routing of the A22 and the downgrading of the existing A22. Past delivery of infrastructure does not inspire me with confidence that improvements will be delivered. Added to this there is the uncertainty of funding available and it can easily be understood why residents of Hailsham are very wary.

***SA13 Ensure everyone has the opportunity to live in a good quality, sustainably constructed and affordable home***

Whereas people moving in to new homes should be provided with a good quality and sustainably constructed new home, there is no guarantee that everyone has the opportunity to live in an affordable home. In addition, this objective includes **everyone** and there is nothing in Wealden's proposals to ensure that any existing resident has the realistic opportunity to live in a good quality, sustainably constructed and affordable home. Thus, this objective should be scored negative.

***SA14 Improve the level of skills, education and training amongst the population and develop a skilled workforce to support long term economic competitiveness***

There is no acknowledgement of the skills gap that exists within the Hailsham area. The words sound very good but the reality is that there has been no provision identified to address this issue.

***SA15 Facilitate improved health and wellbeing of the population including enabling people to stay independent and reducing inequalities in health***

As no text has been added this further discredits this Sustainability Appraisal. The access to GP's in the area is poor with one surgery closed and one surgery running short on GP's with difficulties to recruit and has at the current time closed their books to new patients. The fact that this has not been mentioned at all makes me question what actual assessment has taken place to look at GP provision within Hailsham. The Eastbourne District General Hospital and the Conquest have both been rated as inadequate yet the proposal is for a significant increase in their catchment area. One would assume that families would be encouraged to move to the Hailsham area yet the Eastbourne District General Hospital only has a midwife led maternity unit.

***SA16 Create vibrant, active, inclusive and open minded communities and reduce poverty and social exclusion for all sectors of the community***

There is potential that this could be used as a way of improving the deprivation that exists in Hailsham. There has to be serious concerns how this could be addressed though with the limited budget that will be available. When a Wealden District Council officer states that funding for infrastructure is going to be limited to purely basic road provision linked to the new development it casts doubts on the "nice to haves" would stand any chance of being implemented.

***SA17 Create new employment opportunities and improve access to jobs through facilitating appropriate development opportunities to meet the needs of the economy including support for small and local businesses***

As stated in the Sustainability Appraisal pg 249 "Employment development would place potential employees within accessible reach of jobs and hence improve access to job opportunities". I fear this is wishful thinking, I have seen no evidence to promote the fact that employers will be attracted to this area of the South East. "The scale of development would help regenerate the town centre of Hailsham" again another wishful thinking statement with no evidence to back this up.

***SA18 Diversify and strengthen the local economy through stimulating the regeneration of town centres, enhancing the Districts rural economy, increasing the vitality of the Districts villages and promoting sustainable tourism***

Doubling the size of Hailsham to make a case for regenerating the town centre is a very high price to pay and strengthens the statements I have made above that infrastructure spend in Hailsham has been severely lacking for many years. Many false promises made and little delivered.

## **Infrastructure Category Specific Facility**

### **Transport**

- Road Network
- Bus network
- Rail Network
- Cycling and walking infrastructure

### **Housing**

- Affordable Housing
- Gypsy and Traveller accommodation

### **Education**

- Further and Higher education
- Secondary education
- Primary education
- Early Years (nursery) education

### **Health**

- Acute care and general hospitals
- Health centres/Primary care facilities

### **Public Services**

- **Emergency Services**
  1. Police
  2. Fire
  3. Ambulance
- Libraries
- Waste management and disposal

### **Utility Services**

- Gas supply
- Electricity supply
- Water supply
- Waste water treatment
- Telecommunications infrastructure (including mobile phone and broadband provision)

### **Renewable Energy**

- Biomass, solar, wind energy etc.

### **Flood Defences**

- River Flood defences,
- Coastal defences etc.

### **Social infrastructure**

- Supported accommodation
- Social and community facilities - village halls,
- post offices etc.
- Sports Centres
- Open spaces
- Parks and play space
- Places of worship

### **Green Infrastructure**

- Appropriate Assessment requirements
- Parks and Gardens
- Natural and seminatural urban greenspace
- Green corridors
- Outdoor sports facilities

- Amenity Greenspace
- Provision for children and teenagers
- Allotments
- Churchyards and cemeteries
- Accessible countryside in urban areas
- River corridors
- Green roofs and walls
- Nature conservation and biodiversity

## **RESPONSE TO WEALDEN LOCAL PLAN**

### **HAILSHAM CEMETERY, ERSHAM ROAD by Paul Holbrook**

There is a need to construct a new plan to address the situation of burials. 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 with the projected future expansion of Hailsham.

Requirement to set up a working party/committee to investigate the future situation that the infrastructure would require to meet the needs of the public should they require a burial within the Parish of Hailsham as indicated:

- Expansion of the cemetery;
- Existing and future projected Burial requirements;
- New cremation internment area;
- Construction of a new road giving funeral corteges better access to the internment site;
- Modernisation of the chapel including heating;
- Co-operation from the Funeral Directors to be included in the plan (3 situated in Hailsham);
- 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, Willingdon, Polegate, Stone Cross, Chalvington, Chiddingly, Magham Down and Herstmonceux or within a given radius of Hailsham;
- Liaise with Hellingly as they have their own burial ground as to look at the compatibility due to the future growth in housing in both areas.

## **Charlotte Collinson-O'Toole**

### **Medical services**

- Need for a small hospital – multi use medical centre.
- Hailsham is currently served by 7 doctors surgeries this number would need to double at least to serve the existing area better and begin to serve the new houses.

### **Conservation Area**

- Continue to make sure that Hailshams historic buildings are protected
- Ensure the farmers market is within the plan to keep Hailsham's market town status

### **Environment**

- Green areas, lakes need to be part of the plan – Hailsham cannot take 9,380 houses without provision for these.

### **Transport**

#### Road

- To avoid further issues with traffic Hailsham needs to be restructured to avoid congestion at peak times. Areas of concern are: Ersham Road - South Road - Diplocks Way. Station Road - George Street - North Street.
- Further out of Hailsham the Boship Roundabout is congested at peak times of day. There need to be improvements as these roads serve other large towns as well as commuters.

#### Public

- Whilst the idea of a rail or light rail option to access Polegate would be the preferable, other things to be considered would be greater parking at Polegate with better access would improve things greatly.
- More frequent buses with a night service.

### **Education**

- An absolute need for at least 7 more primary schools and another secondary school but would need to be guaranteed support from the appropriate council to ensure there are enough teachers to cover the area.

- A greater number of nurseries / preschools / play groups needed.

### **Sports and Leisure**

- Hailsham leisure facilities have just been upgraded however, they would not cope with double our population. A need for a potential new site for another leisure centre.
- Allocation for public use sports areas (tennis/basketball)

### **Economic Plan**

#### Tourism

- To allocate land for a tourist attraction to create employment and get people to visit Hailshams area.

#### Retail

- Create better units to gain other retailers to Hailsham. Therefore boosting employment.

### **Social Infrastructure**

- Cemeteries/Burial Grounds
- Town Halls / Community Centres

### **Wealden Design Guide**

- To make sure Hailsham not only gets what it needs but what it wants.

# Wealden SHMA

## A Critique of the Strategic Housing Market Assessment

26 November 2015

This document has been written by Nick Daines  
Nick is a resident of Wealden. It is not been written as a technical consultant

## **Note:**

The SHMA report has been produced by GVA on behalf of Wealden District Council. GVA's document is titled "Strategic Housing Market Assessment Final Report October 2015". However, when published on Wealden's website, there is a plain sheet inserted in front of GVA's document with the following text:

### *Wealden SHMA*

*This SHMA is a draft final document and some detailed elements are still subject to clarification and possible amendment. However, the overall fundamental aspects which provide the basis of our preferred options for testing are considered robust.*

At of the date of this critique, 26 November 2015, Wealden has not advised of any changes, clarifications or amendments to GVA's report.

Wealden has been informed in November of several errors within the Final Report, but no corrections or addenda has been issued.

Two FOI requests have been made to Wealden for further information on their requirements and discussions with GVA regarding their SHMA report, but receipt of the information is still awaited.

This critique is therefore based upon the contents of GVA's Final Report dated October 2015 and Wealden's use thereof.

## **Contents**

1. Executive Summary
2. Economic Growth
3. Affordable Homes
4. Errors

## 1.0 Executive Summary

The GVA SHMA report dated October 2015, has been used by Wealden District Council to inform their objectively assessed housing need (OAN).

In Section 7 of the report, GVA conclude that the OAN is 735 dwellings per annum in the period 2013 - 2033. They also state that the affordable dwelling requirement is 6,617 dwellings at 331 dwellings per annum.

Due to time pressures, this critique has only examined part of Section 7, Objectively Assessed Housing Need (7.31 - 7.51 on Economic Growth) and parts of Section 8, Meeting the Affordable Need of Households (8.1 – 8.71). However, in these sections, it is considered that there are errors in the analysis employed by GVA that result in an inflated number of dwellings being assessed to meet the need.

Period 2013 - 2033	OAN Dwellings Economic Growth		Affordable Dwellings	
	Total	Annual	Total	Annual
<b>GVA SHMA Final Report</b>	<b>14,720</b>	<b>736</b>	<b>6,617</b>	<b>331</b>
<b>Corrected analysis</b>	<b>9,360</b>	<b>468</b>	<b>3,374</b>	<b>169</b>
<b>Excess dwellings in GVA Report</b>	<b>5,360</b>	<b>268</b>	<b>3,243</b>	<b>162</b>

GVA has included several warnings with regard to the accuracy of forecast data and the effect on their analysis. They advise Wealden to be cautious with the results. Wealden has ignored this advice

The GVA analysis has used forecasts to 2026 or 2031 and extrapolated the results to 2033. Wealden, however, has compounded any forecasting errors by further extending the figures to 2037.

The GVA report contains additional errors and these have been brought to the attention of Wealden. However, there has not been any feedback from Wealden concerning these errors.

**This paper concludes that the GVA SHMA is not fit for the purpose of assessing either the objectively assessed housing need, or the affordable housing need.**

**Given that these two needs are so fundamental to local plan making, it is considered that the current consultation process on the Issues, Options and Recommendations documents should be suspended until a sound assessment is available showing the correct OAN and affordable housing need.**

## 2.0 OAN - Economic Growth

### 2.1 Summary

GVA has utilised forecasts from three forecasting bodies to predict the number of jobs in Wealden in 2031 (or 2025 in the case of one forecast). GVA has then projected these figure forward to arrive at the number of jobs in 2033. The three forecasts do not agree on either historical job growth in Wealden (varying from 471/year to 866/year) nor do they project similar results for future growth (253 – 690 jobs/year). GVA has used a figure of around 600 jobs/year, based on the average of the two higher forecasts, and termed this the high growth scenario. The figure of 253 jobs/year has been termed the low growth scenario.

GVA has not undertaken any analysis to investigate the variances between the three forecasts. They have however, included a considerable number of warnings in their report regarding uncertainties in both the data used, the output of the forecasts and their subsequent assessments.

GVA indicate that one forecast shows Wealden job growth increasing 67% faster than Lewes and Rother to 2025, 126% faster than Eastbourne and 210% faster 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.

Between 2005 and 2013, 4,490 jobs were created in Wealden and 3,505 houses constructed. This equates to a ratio of 0.78 houses/job. GVA has decided not to use this ratio going forward and has arrived at their own figure of houses needed to accommodate people migrating in to the District to fill the new jobs. They state in para. 7.50:

*It is not satisfactory to simply roll forward this relationship / ratio. Instead GVA has used reasonable assumptions about how each of these assumptions might change going forward over the projection period.*

There is no explanation what these reasonable assumptions entail nor their effect on the other assumptions (which are also undefined). However, GVA concludes that 736 new dwellings per annum are required for the high growth scenario and 486 dwellings per annum for the low growth scenario.

In their Issues, Options and Recommendations document, Wealden has taken forward the 736 dwellings/year as their objectively assessed housing need (OAHN). Wealden has ignored the large numbers of warnings or cautions that GVA include in their SHMA report.

However, if it is assumed that 600 jobs/year is the correct figure, using the historical ratio of 0.78 for houses/jobs, this results in a need of 468 dwellings/year using the high growth scenario and 197 dwellings/year using the low growth scenario. If an average jobs growth between the three forecasts was used, this would result in 490 jobs and a need for 382 new dwellings/year.

The need of either 382 or 462 new dwellings is considerably less than the 736 figure Wealden is proposing to take forward which, upon careful examination of the SHMA, can be shown to be an incorrect figure.

## 2.2 Introduction

Paragraphs 7.31 - 7.51 of the SHMA examine the future economic growth of the District and attempts to make a case that a rising jobs demand will require people to in-migrate to fill these jobs.

The concluding paragraph of this section of the SHMA proposes a need for 736 new dwellings/year, based on a high jobs growth scenario, or 486 new dwellings/year, based on a low jobs growth scenario.

The 736 dwellings/year has been taken forward by Wealden as their objectively assessed housing need.

Evidence is provided below that demonstrates that the 736 dwellings/year has been calculated incorrectly by GVA and the actual number of dwellings needed to permit economic growth is considerably lower.

## 2.3 Future Job Growth

The section containing paragraphs 7.31 – 7.41 is headed “Economic Growth”. However, it is solely concerned with jobs growth and appears to consider the two are synonymous. There is no analysis on type, quality or provider of these jobs. Thus to assume that all jobs growth either leads to economic growth or is a result of economic growth is overly simplistic.

To inform their analysis, GVA has used forecasts of employment growth developed by three forecasting bodies. Two of these bodies, EEFM and Experian, have produced forecasts to 2031, whilst the third forecast, by ESEFM, is to 2025.

Combining the three forecaster’s data from Tables 62 & 63 in the SHMA, shows the large variance between the three forecasts:

### Employment growth

Forecaster	1997 – 2013 Estimate		2013 – 2031 Forecast	
	Total Jobs Growth	Annual Jobs Growth	Total Jobs Growth	Annual Jobs Growth
EEFM	8,228	514	4,562	253
Experian	7,540	471	9,480	527
ESEFM	13,857	866	12,424	690

There are several points to note:

1. The wide difference between the historic growth estimates.
2. The even wider difference between the forecasts
3. Two forecasters predict that future jobs growth will be at a lesser rate than their historical estimate, whilst the third predicts an increased rate

Taking each of these points in turn:

The difference between the highest and lowest estimates of job creation in Wealden between 1997 and 2013 is 83%. This is a very wide margin for an estimate of historical data. There is no evidence that GVA has sought to investigate these differences to understand whether any of the three forecasters' models is more robust than the others or is likely to be more relevant to Wealden.

The difference between the three forecasts is even more pronounced with the highest forecast being 173% greater than the lowest. It is considered that this substantial difference should have raised a concern within GVA who should have then attempted to investigate the reasons behind the difference. There is no evidence that this has been undertaken.

The three forecasts predict a change from each of their historical trends of -103%, +12% and -29%. Again, this is a very wide difference, and without any subsequent investigation, it should cast great doubt on using, without further analysis, the outputs of these forecasts.

However, GVA has taken the average of the numbers of jobs predicted by the two higher forecasts (600 jobs/year) and termed this the high growth scenario and called the lower forecast (253 jobs/year) as the low growth scenario.

GVA has indicated that they sought advice from Wealden with regard to which forecast should be used to form the basis for understanding future employment growth. They state that the ESEFM forecasts were put forward as the most appropriate for the District. The reason behind this was that these forecasts are used by other Districts in East Sussex. It is considered that this is a very weak reason for selecting this forecast over any other, and that the selection should have been on the basis of which forecast is more likely to accurately reflect future employment growth. That GVA did not do this, and Wealden selected the forecast that showed the highest growth on a very weak reason, completely undermines the integrity and validity of any subsequent use of the data.

As stated above, two of the forecasts are to the period ending in 2031, whilst the third forecast, the one selected as the most appropriate, is to 2025. GVA has extrapolated these results to 2033, which in the case of the EEFM and Experian forecasts, is not likely to induce too much error. However, in the case of the ESEFM forecast to 2025, to extrapolate a further eight years to 2033 could incur significant error. This possibility has not been acknowledged by GVA.

This potentially unsound position has been further exacerbated by Wealden in their extrapolation further of the results through to 2037. In the case of the chosen ESEFM forecast, this is making the assumption that the forecast results for the period 2013 – 2025 are valid through to 2037 i.e. an extension equal to the original forecast period. Given the uncertainties inherent in any forecast, this is bad practice and liable to result in a significant error.

GVA has produced a table in the SHMA, Table 64, which illustrates the forecast growth in employment in East Sussex showing that new jobs in Wealden will grow at a rate 67% greater than Lewes and Rother, over 100% greater than Eastbourne and more than 200% greater than Hastings. Given the complete lack of large employers in Wealden, and the proximity of these other areas, these figures produced by ESEFM seem highly implausible. GVA has not undertaken any testing on these forecasts to check on their robustness or sensitivity.

## 2.4 Relationship between jobs growth and housing

Paragraphs 7.42 – 7.51 in the SHMA provide text on unemployment, economic activity, commuting and the relationship between jobs growth and housing. However, there is no evidence relating to how any of the included data has been used to inform the jobs/housing relationship.

Paragraph 7.50 provides data from 2005 – 2013 stating that Wealden delivered around 3,505 houses in this period and 4,490 jobs were created (ESEFM). It is thus straightforward to calculate that this represents an average of 0.78 houses/job over this eight year period.

However, GVA continue by stating:

*This ratio is based on a specific set of circumstances such as the level of household formation at the time, unemployment in the population, economic activity levels etc. It is not satisfactory to simply roll forward this relationship / ratio. **Instead GVA has used reasonable assumptions about how each of these assumptions might change going forward over the projection.** (Author's emphasis)*

However, no information whatsoever is provided on any assumptions made by GVA and how they may have modified these assumptions. Given that the relationship between new jobs and housing need is obscure, the complete lack of any explanation by GVA in how they have derived their housing number is bizarre and casts doubt on the provenance of their analysis.

In paragraph 7.51 GVA state that using the high jobs growth scenario, (average of the growth forecast by ESEFM and Experian) demonstrates a need of 736 dwellings/year whilst the low jobs growth scenario (EEFM) results in a much lower annual requirement of 486 dwellings. There is no explanation with regard to how these dwelling needs have been derived.

The 736 dwellings figure represents a ratio between houses and jobs of 1.23.

The low jobs growth scenario represents a ratio between houses and jobs of 1.85.

The reason for the difference between these two GVA ratios is 50%, is unexplained and impossible to deduce. These ratios are also considerably at variance with the recent trend of 0.78. With no explanation as to why GVA consider their ratio is authentic, their use of this ratio lacks credibility. It is noted that Wealden has not questioned this point.

If the historic 0.78 ratio is used to assess the level of housing needed by people to fill the 600 jobs, this would produce a housing need of 468 dwellings/year using the high jobs growth scenario and 197 dwellings/year using the low jobs growth scenario.

GVA state in paragraph 7.51 that they consider the EEFM forecast to be overly pessimistic and therefore propose that the high growth scenario should be put forward as the most appropriate basis for understanding future job growth. The reason for this position is not explained, nor is there any rationale or evidence to support this position. Wealden has not challenged GVA's position but has accepted the high growth figure and ignored any other.

Given the wide variance between the jobs forecasts, it is considered that the average between them may be more appropriate to take forward. An average would produce a figure of 490 jobs. At the historic 0.78 house/jobs ratio this would require 382 new dwellings per annum.

## 2.5 Concerns on Use of Data

Throughout this section on Economic Growth, GVA has recorded various warnings with regard to either the robustness of the data they have used, the veracity of the forecasts or how their outputs should be interpreted.

These concerns are repeated below:

7.32

*The forecasts are therefore quite crude at the local level and do not take into account some of the very specific and local issues.....*

*Overall there is a considerable level of uncertainty associated with any local forecast which must be considered when reviewing the results of this work.*

*Furthermore, and as set out below, the lack of 'agreement' between the different forecasts and estimates used provides a further level of uncertainty about which forecast(s) represents an appropriate understanding of the future jobs economy in Wealden.*

7.33

*It should be noted that these models all have different base dates, inputs and methodologies and are therefore not directly comparable;*

7.37

*....shows that each forecast has a different conclusion about how the economy of Wealden will grow in future.*

7.38

*Caution should be exercised when utilising economic forecasts for population and household projections as they include population as an input and make specific assumptions about how the economic characteristics of a population might change over time which may/may not be realistic. Indeed the PAS Guidance on assessing housing needs raises this as a potential issue.*

*.....when assessing future housing needs albeit any uncertainties should be recognised.*

7.39

*Given the forecasts do not project that far ahead assumptions have been made.*

***This introduces more uncertainty.***

7.41

*A further uncertainty which should be discussed is the relationship between job growth and population growth.*

7.43

*Given the unreliability of the data and the significant variations.....*

7.51

*Given the implications this has for housing needs, it is recommended that future changes in economic prospects/forecasts are monitored going forward*

It is clear that by including 12 warnings in the space of 20 paragraphs, that GVA is very concerned that uncertainties within the data and large variances within the three forecasts could well result in an unsound assessment of the housing need. However, it is also very clear that Wealden has completely ignored all GVA's concerns. Wealden has used the high growth need to inform its assessment that the housing need is 736 dwellings/year and has taken this figure forward to the Issues, Options and Recommendations consultation document.

A more sound and professional approach would have been to test the sensitivity and provenance of the data to arrive at a figure for the housing need that was far more robust. Undoubtedly, this figure would be considerably lower than the 736 dwellings/year taken forward by Wealden.

### **3.0 Affordable Housing Need**

#### **3.1 Summary**

In Section 8.58 of the SHMA on page 191, the authors, GVA state:

*Wealden District Council therefore has a net average affordable housing need of 322 households annually, which equates to 4,506 households over the Core Strategy plan period, and 6,436 households over the projection period.*

Note: the figure of 331 households annually and 6,617 households in total quoted above includes a 2.8% allowance for empty stock.

However, GVA's analysis of the affordable home requirement is flawed and greatly overestimates the housing need. Significant errors have been made in three aspects of the analysis:

- the number of houses needed to clear the backlog (the current waiting list) has been overestimated by 375 dwellings
- the proportion of existing and new households requiring affordable homes has been overestimated by a factor of five
- the future rate of delivery of affordable homes has been underestimated by 87%

By correcting these errors, it is shown that if Wealden continue to provide an average of 203 affordable units per year, similar to that achieved over the five year period 2010/11 – 2014/15, then there will be an over-supply of 686 more affordable units the forecast need to 2033.

Therefore there is no need to upwardly adjust the assessed housing need in order to meet the requirement for affordable homes

#### **3.2 GVA Errors**

There are at least three areas where it is considered that GVA's analysis is at fault.

1. There is an error in the way GVA has cleared the backlog i.e. the waiting list, of affordable houses. (1.3 in the table at 3.2.4 below)

2. GVA has calculated that 49% of households in Wealden cannot afford to buy or rent a home in the open market and thus need an affordable home. They have assumed that 49% of newly formed households within Wealden will also be unable to afford market housing and that 49% of households migrating in to the District will need affordable housing. (2.2 in the table at 3.2.4 below)

3. GVA has assessed that there will be an average of 116 new affordable homes constructed each year. (3.3 in the table at 3.2.4 below)

These errors are described in more detail in the text below, and are corrected in the table in section 3.2.4. The first three columns of this table have been copied from columns 1, 3 & 5 of Table 74 in the SHMA. Three further columns have been added, the first for notes with the other two columns either replicating GVA's numbers (shown in black) or the corrected numbers (shown in red).

### **3.2.1 Backlog Error**

Wealden has confirmed to GVA that there is an existing backlog of 875 households at April 2015 waiting for an affordable home. This number excludes homeless households as they are considered separately and transfers, as these have a neutral effect on the requirements. GVA has assumed that this backlog will be cleared by the end of the CSLP period in 2027. This backlog is referred to as 'Other Groups' in row 1.3 in the table below.

In their Table 74 on page 190 of the SHMA, GVA indicate that the 875 unit backlog will be eliminated by 2027, by building an average of 63 additional affordable homes per year. However, they have continued this backlog reduction by showing a requirement for an additional 63 dwellings/year through to 2033, thus effectively increasing the number of new homes to clear the 875 dwelling backlog to 1,250 dwellings.

This very basic error has been corrected in the table below by including an annual rate for backlog reduction of 63 dwellings until 2027 and then zero thereafter. Thus, the total number of dwellings in the period to 2033 needed to clear the 875 backlog, correctly remains at the backlog figure of 875.

### **3.2.2. Significant over-estimate of the proportion of Wealden households who cannot afford market housing**

In Section 6 of the SHMA, GVA has undertaken extensive analysis of the housing market in Wealden and the levels of household income. GVA has concluded that 49% of households cannot afford market housing based upon a maximum of 30% income being expended on housing costs. GVA then conclude that 49% of Wealden households require affordable housing. GVA also concludes that 49% of newly formed households in Wealden will be unable to afford market housing.

Furthermore, GVA conclude that 49% of households arriving in Wealden from outside the District will be unable to afford market housing. They qualify this point by stating that those households moving in to Wealden are more likely to be in work given their ability to afford to move into the area and that these households would also be ineligible for a period, for social housing. However, GVA consider that government guidance would not fully permit these households being excluded from the assessment of need and have not made any adjustments.

GVA's analysis may conform to some aspects of the Planning Policy Guidance but when compared with published Wealden housing data there is a huge mis-match.

Wealden's Housing Fact Sheet July 2014 states that Wealden's housing register contains 1,070 applicants of which 296 are transfer cases (no figure is given for the number of homeless on the register). Thus, there are a maximum of 774 applicants who are in need of an affordable dwelling. Wealden has 3,024 council owned dwellings with a further 2,160 provided by other bodies. There is therefore a total of 6,099 households, either on the waiting list or housed in affordable dwellings. This 6,099 represents 9.2% of the total of approximately 65,000 (Table 406 2012 Household Projections) households in Wealden.

Extracts from the Housing Needs Survey 2009 recorded in the Housing Fact Sheet July 2014, indicate that 49.4% of newly formed households moved into the private rented sector whilst 41.4% moved into owner occupation. These two total 90.8% and it can be presumed that the balance i.e. 9.2%, moved into affordable accommodation.

Thus, GVA's assertion that 49% of Wealden households cannot afford market housing is contradicted by the fact that 90.8% of current households are in market housing. This indicates that only 9.2% are either currently in, or on the waiting list, for affordable housing.

It is therefore considered that a figure of 9.2% of Wealden residents require affordable housing is demonstrably realistic.

By arriving at a figure of unaffordability for Wealden households of 49%, which is much higher than all the actual evidence, demonstrates GVA must have made errors in selection of their data, and/or in their analysis. GVA has not attempted to verify their assertions against the current household profile and therefore the huge mis-match between GVA's calculation and reality has not been recognised. It is concluded that the figure of 49% is totally implausible and unreliable.

Given that the 49% needing affordable homes is incorrect for those households within Wealden, it will also be incorrect for those households moving in to Wealden. A figure of 9.2% is proposed for those households moving in to the District who will require affordable housing.

By utilising the figure of 9.2% of households unable to compete in the open housing market, this reduces the future need stated by GVA of 6,292 homes to 1,181 homes, a reduction of 5,111 affordable homes in the period to 2033. This is shown in 2.2 in the table below.

### **3.2.3 New Affordable Housing Stock**

In paragraph 8.41 of the SHMA, GVA has described the method by which they have assessed the future supply of new affordable homes, thus:

*For Step 3.3 the committed supply of new affordable housing has been assessed based on the Affordable Housing Sites & Developments in Wealden 2014/15 data, using sites with planning permission (either on site or not yet started) which are expected to be fully delivered by 2019, having started on site in 2011 at the earliest. As such an 8 year average, 116 units, is used as the annualised figure and this is scaled up appropriately to the level for the Core Strategy plan period, yielding 1,624 units, and projection period, yielding 2,320 units*

This is considered to be a bizarre, convoluted and overcomplicated way to assess the future delivery of affordable homes. It produces a result that is demonstrably incorrect.

GVA consider in their analysis that in the period 2011 – 2018, a total of 928 affordable units will be constructed at an average of 116 units/year. However, the number of units actually constructed in Wealden since 2010 is shown below:

2010/11	228
2011/12	224
2012/13	163
2013/14	207
2014/15	193
<b>Total</b>	<b>1,015 units, at an average of 203/year</b>

The total of affordable homes provided in Wealden after 2010/11 is 787. Thus, for GVA's method of analysis to be correct, this would require that only 141 units are provided in the period 2015 – 2018, at a rate of 35 units/year. This rate is considerably less than the five year average of 203 units a year and it is highly improbable that the current rate of supply will fall to this level. This provides very little confidence in the efficacy of GVA's method of analysis.

The PPG encourages planners to use secondary sources of data to inform their forecasts and these data suppliers e.g. ONS & DCLG, take historic trends and project them forward. This same approach can be employed to forecast the delivery of new affordable homes by assuming a constant rate of future delivery based upon the last five years performance.

Thus, it is considered that a figure of 203 new affordable homes per year has a far more robust provenance than the GVA assessment of 116/year.

The rate of 203 affordable homes per year has been used in row 3.3 in the table below.

### 3.2.4 Corrected Calculation of Affordable Housing Requirement

GVA Analysis			Corrected Analysis		
Replicated from Table 74 on pages 190/191 SHMA					
	2013-2033	Annual	Comment	2013-2033	Annual
<b>Step 1 Current Housing Need</b>					
1.1 Homeless households and those in temporary accommodation	2,940	147	147 used here although FOI request indicated actual number housed in 2014/15 was 69. This would reduce the total by 1,560 units over 20 years	2,940	147

Critique of SHMA v2

1.2 Overcrowded and concealed households	0	0		0	0
1.3 Other groups	1,250	63	1,250 is incorrect as the backlog of 875 will be cleared by 2027 at 63/year	875	63 to 2027 0 after 2027
<b>1.4 Total current housing need (gross backlog)</b>	<b>4,190</b>	<b>210</b>		<b>3,815</b>	<b>210 to 2027</b> <b>147 after 2027</b>
<b>Step 2 Future Housing Need</b>					
2.1 New Household formation	12,840	642	Subject to the household projections being correct	12,840	642
2.2 Proportion of newly emerging households unable to buy or rent	49% 12,840x49% 6,292	49% 642x49% 315	There are 9.2% affordable homes in Wealden. The number of newly formed households in need is also 9,2%	10% 12840x10% 1,284	10% 642x10% 64
2.3 Existing households falling into need	4,600	230		4,600	230
<b>2.4 Total newly arising housing need</b>	<b>10,892</b>	<b>545</b>		<b>5,884</b>	<b>294</b>
<b>Step 3 Future Affordable Housing Supply</b>					
3.1 Affordable dwellings occupied by households in need	0	0		0	0
3.2 Surplus stock	57	3		57	3
3.3 Committed supply of new affordable housing	2,320	116	In the five years 2010/11 to 2014/15 1,070 affordable houses were built at an average of 203/year. This rate has been projected forward to 2033	4,060	203
3.4 Units to be taken out of management	532	27		532	27
<b>3.5 Total new affordable housing stock available</b>	<b>1,845</b>	<b>92</b>		<b>3,585</b>	<b>179</b>
3.6 Supply of social relets	6,500	325		6,500	325

Critique of SHMA v2

3.7 Supply of intermediate affordable housing for re-let/sale at sub market levels	300	15		300	15
3.8 Future supply from existing affordable housing	6,800	340		6,800	340
<b>Step 4 Bringing the evidence together</b>					
4.1 Total affordable housing need	13,326	662	1.4 + 2.4 - 3.5	6,114	325 to 2027 262 after 2027
4.2 Net affordable housing need	6,436	322	4.1 – 3.8  Building affordable houses at 203/year will provide 686 more than the forecast need by 2030	-686	-15 to 2027 -78 after 2027

Notes:

1. Numbers in black are those derived by GVA.
2. Numbers in red are those changed after correcting GVA's analysis
3. Numbers in black used in the corrected analysis columns have not been checked for accuracy and may be subject to review.
4. The 147 households per year used in Step 1.1 in the table is also questionable. GVA state that this figure for homeless households was provided by Wealden. However, in a response to a FOI request (4156), Wealden state that 69 homeless households were placed in either Council or Registered Provider accommodation in 2014/15. Thus, if GVA's figure of 147 was replaced by 69, this would reduce the requirement for affordable homes by a further 1,560 over the period to 2033. However, for this current analysis above, the 147 has not been amended.
4. The net affordable housing need in the corrected columns demonstrate that continuing to build affordable houses at the average rate achieved over the five year period 2010/11 – 2014/15 of 203 per annum, will produce 686 more affordable houses by 2033 than the revised calculation of need.

## 4.0 Errors in SHMA

### 4.1 Summary

Many errors have been found in GVA's SHMA. Most are minor, however, it is clear that some/all of the sections of the report have not been proof read by GVA prior to release to Wealden. In addition, it is clear that some/all sections of the report have not been checked by Wealden prior to using the information in their Issues, Options & Recommendations documents

In addition to the errors in the analysis detailed in Sections 2.0 & 3.0 above, the lack of checking by both GVA and Wealden is a concern and raises a doubt with regard to whether the procedures both organisations have in place have been complied with and raises a question regarding the quality of the analysis .

### 4.2 Errors Notified to Wealden

Para.	Date Wealden notified	Error	Wealden Response
2.26	07/11/15	Table 8 refers to residents 16-64 whilst text has16-74	Your comments relating to the SHMA have been forwarded to the consultants who prepared the draft SHMA to respond to. As soon as we have a response we will contact you further
4.21	07/11/15	97.5% residents are white whilst page 86 has 95.4% are white	As above
7.16	07/11/15	Graph in Figure 67 missing	As above
7.26	07/11/15	Text shows period to 2037 whilst Table 60 indicates 2033	As above
Table 59	07/11/15	Data missing from Table	As above
Table 63	07/11/15	Jobs data different between Tables 10 & 63	As above
4.32	12/11/15	Error in data from 2001 census and	None

		2013 MYE	
5.3	19/11/15	Error in either employment percentage or date.	None

**Wealden Draft Local Plan**  
**Draft response from Wadhurst Parish Council, November 2015**  
**1<sup>st</sup> Revision**

**Introduction**

1. Wadhurst is a thriving community, with many excellent facilities. We have a railway station with one of the best services to London in the District, we have a thriving High Street, primary and secondary schools, a post office, a library, a doctor's surgery, a filling station, three pubs, several cafes, two banks, and many other facilities which many neighbouring communities lack. We therefore accept our designation in the plan as a Sustainable Settlement, and are proud of what we can offer.
2. We also accept that, to remain as a thriving community, we cannot stand still. We must change and adapt to the world as it is in the first half of the 21<sup>st</sup> century. And as part of that change, we accept that we will need more homes, and different homes, as the economy, and the needs of our population, change. If we want our young people to have the option of staying in the village, if we want our older population to remain independent in their own homes, if we want to ensure that people who work in our community live in our community, we need to be part of a planned process which ensures we have the correct mix of homes which are properly geared to the needs of Wadhurst.
3. However, we believe that growth and change should be planned and managed, as far as the current legislative framework allows. This response therefore looks at a range of issues on which we have views: numbers, housing mix, location, infrastructure, phasing, density, and design. And though housing is inevitably the focus of most people's interest and therefore our response, we will also comment on other matters such as the adjustments to the conservation area boundaries.

## Numbers

4. The Draft Local Plan itself acknowledges that the proposed number of houses in Wadhurst may be hard to achieve because of the fact it is entirely within the AONB, is landscape-constrained and “land potential may not be realized and overall growth reduced”. Our previous figure for housing growth was set in 2013 and required 70 new homes, and that has clearly already been exceeded. Although the Bellerby’s development is technically excluded from the numbers, its presence is a reality and the impact of 40+ new homes on the community will be real, even if it is excluded by a paper exercise. We would argue that this development, at the very least, should be included, reducing the overall proposal to around 200 houses.
5. That figure of 200 is in our view still too high, particularly given the nature of the terrain and the problems in locating housing. What defines Wadhurst is its location on a ridge, and land falls away steeply on all sides. This creates logistical issues, particularly along the busy B2099 – not just the regular congestion in the village centre, but complete gridlock at the all-too-frequent times when an incident on the A21 causes traffic to be diverted through the village. We question the capacity of our roads to sustain a 20% growth in housing numbers unless many other infrastructural issues are addressed.
6. In addition, Wadhurst is now within the 15km Screening Zone for Ashdown Forest. The need for this to be taken into account was emphasized when the developers of the Stone Cross Road site were required to contribute £56,000 in mitigation of the development’s impact on Ashdown Forest. We do not believe that this new factor has been properly considered when the numbers for Wadhurst were set, and they should be reduced accordingly.

## Housing Mix

7. Wadhurst has possibly the best connections to London of anywhere in the District. It has therefore inevitably over the years attracted a large number of people who live here mainly because of the easy access it offers to London. This means that we have a large number of “executive” homes, 4 and 5 bedroom houses, which are targeted at the commuter population. These homes are attractive for developers to provide, and seem to have a bottomless market, which can only increase as house prices in London continue to rise. As the plan itself states “Easily accessible high-paid jobs situated outside of the District means that it is difficult for the relatively low paid locally employed people to compete in the market.”
8. The continuing development of such homes puts pressure on the infrastructure (medical facilities, schools, car parking) while bringing proportionately little into the local economy in terms of jobs, local shopping etc. We wish to see an appropriate housing mix in the village. The creation of new social housing (confusingly known as “affordable” housing) is important, but is not the only issue. We need homes for first time buyers, smaller homes for older people downsizing, and a range of tenures including shared ownership initiatives to help the less wealthy to get a foot on the housing ladder. We seek assurances from WDC that these issues will be taken into consideration, and need clear statements as to how this can happen.

## **Location**

9. In view of the problems of congestion in the village centre, we believe it is important that development is largely concentrated to the north-west and west of the village, in locations which give easy access to the station. The sooner actual preferred locations are set, the sooner a full consideration of infrastructural issues can be undertaken.

## **Infrastructure**

10. There is a general concern that any support for infrastructure development will be pulled away to the south of the District, particularly in supporting the developments in Hailsham, and improvements to the A27. Unless the needs of smaller communities to the north of the district are considered, it will become increasingly hard for large numbers of our population to have access to services and to recreational and cultural opportunities.
11. One aspect of Wadhurst's infrastructure is immovable – we have a medieval High Street at our centre, and this will continue to cause problems (as well as enhance the attractiveness of the village). There has been some interest during this consultation in the creation of a by-pass, though there is a recognition that finances are unlikely to allow this to happen. There are also mixed views on this, with local examples given both of by-passes having drawn life out of a village (Lamberhurst), and of villages prospering as a result (Robertsbridge).
12. Whatever the solution, the impact of a growing number of cars on our constrained road system is all too clear – many of our roads are literally falling apart due to the weight of traffic. Cars use rat-runs to avoid the village centre, meaning that the impact on these unclassified roads is catastrophic – Blacksmith's Lane provides a dramatic example of this. Increased development, particularly to the East of the village, can only make this worse.
13. Another “big idea” which has been raised is the creation of an education campus on the outskirts of the village, to which both schools and possibly other facilities would move. This would have the advantage both of diverting traffic and parking from the village centre, and freeing up the current school sites for housing development. However, in the current climate for public spending, it is hard to see how this might be financed.
14. One aspect of our infrastructure causes particular concern in relation to housing growth – the GPs surgery. We are lucky to have a well-resourced, training practice, offering a wide range of services. However, as the services have grown over the years, the building, on a particularly constrained site, has not, and it is inconceivable that the level of growth suggested could be countenanced without the surgery expanding. An opportunity may arise to a relocation elsewhere in the village if the proposed changes on the Commemoration Hall site take place. If this does not happen, an alternative solution will need to be found. This is our number one priority for infrastructure investment, and it will be necessary for plans for this to be well advanced before there is much more housing development.

15. It is our understanding that any necessary expansion of our schools can happen on the existing sites, though this may need additional financial support.
16. Parking remains a major issue in the village which is yet to be resolved.
17. We urge the District to develop a clear, transparent basis by which towns and villages can articulate, and seek support for, the infrastructure we need. Otherwise the infrastructure investment will inevitably be drawn away to the south of the District.

### **Density**

18. Density is one of those issues which has a major impact on housing developments, and we are concerned that there are very few constraints on this. We are alarmed by some recent examples in the village where too many houses have been crammed onto very small areas of land, and the problems this causes particularly in relation to parking and traffic management. At the other end of the scale, the purchase of large areas of agricultural land to create very few luxury homes is also of concern, eroding the ANOB with very little benefit to the village.

### **Design**

19. Likewise, we are concerned that there are too few constraints on design. We are of course supportive to the general principle that developments should be appropriate to the area and its vernacular, but are concerned that too often this leads to feeble pastiche rather than an attempt to find the 21<sup>st</sup> century equivalent of local design.
20. The prominence of large national developers compounds this problem – there is a danger that we effectively get an identikit development, with perhaps a bit of hung tile or weatherboarding making a nod to the location, rather than a real interest in local design and materials.
21. In addition, the streetscape of ancient villages and small market towns is characterized by their diversity, and simply varying a standard design a few times within a development of 30 houses is inevitably going to erode that diversity.
22. For these reasons, we are particularly keen on the use of self-build, and of local developers, who might create smaller developments or single houses which are more creative and sympathetic. However, we note that self-build is currently exempt from the payment of CIL, and believe that this needs to be addressed in order to close a loophole which developers might exploit.

### **Phasing**

23. We understand that the timing of developments is often dictated by a number of factors outside the District Council's control – particularly the availability of land and the interest of developers. We would like there to be a clearer sense in the plan (a) that development will be phased and (b) that those communities which do see a lot of early development will not be

penalized by further development being permitted. We understand that the Inspector would not allow phasing to be part of the previous plan, and believe that this should be strongly contested. The issue of phasing is particularly crucial to an area like Wealden where there are many scattered communities – it may be less so when there is development around one single urban mass. The Inspector’s view needs to be challenged as being one which creates problems in a dispersed rural community, and we feel that Wadhurst, because of the attractiveness to commuters which we have already explored, is particularly vulnerable to continual development pressures.

### **Non Housing matters**

24. We support the proposed changes to the conservation area, to include an important area to the West of the village, and to further preserve some of our best views.
25. In terms of the development of the economy, we would like to see more recognition in the plan of the fact that this part of the District is more affected by the London economy than the economy of the rest of the District.
26. While we recognize that there may be parts of the District in which attracting national retail chains would be desirable, we feel strongly that this is not desirable in a village like Wadhurst where the very character of the village is defined by its independent shops.
27. Wadhurst Parish Council supports dark-skies initiatives and believes that this issue should be fully taken into account in the plan. As an officer of the AONB Unit wrote last year:  
“Fortunately, in the High Weald AONB there are still places relatively free from the damaging impacts of light pollution and the parish of Wadhurst is one of them. The unusually dark skies over Wadhurst ..... therefore represent a special resource worthy of conservation, particularly in the context of the densely populated South East”
28. In terms of the Strategic Culture and Leisure Options discussed in the Plan, we strongly support the development of a wide range of local options rather than the development of single solutions to serve the whole district (such as a sports campus). Such facilities are unlikely to be of benefit to communities like ours on the edges of the District. This is a particular issue for young people, who are least likely to be able to use a distant facility.

### **Conclusion**

29. We are fully aware of the number of constraints under which the District is working, not least the generally permissive planning legislation and a huge number of factors which are largely beyond its control, from the nature of the A21 to overseas purchase of housing in London for investment.
30. However, if the District is to continue to benefit from the things which mark it out a great place to live and work, more consideration needs to be given to the things which make it special, particularly preservation of the rural environment and the ability for each community to

function as just that – a community.

31. Our overall stance in this consultation can therefore be summarized as follows:
- a. We welcome some housing growth, but less than is proposed and with an appropriate mix of size and tenure of homes.
  - b. However, in order for our community to benefit, we need infrastructural investment, and wish to see some guarantees that this will come in a timely manner which relates to any growth in housing.

John Puttick 01/12/2015 (during NP Sub-Committee)

The council will work positively with Wealden on the Hailsham Area as long as satisfactory answers to the following issues are received, in document form, from Wealden District Council and the appropriate service providers, for the services detailed below

Virginia Browne 02/12/2015

The Town Council takes an active role in responding to consultations on matters concerning development and infrastructure within the town's boundary. The Town Council do not see the Issues and Options Consultation as a constructive document given the length of time the plan is expected to be in place for. Hailsham Town Council do not agree with the proposed development figures produced. These figures should be revised to facilitate a growth rate of 60%. Also, given the weighted demographics of the town's ageing population - retirement/residential homes and windfall developments should all contribute to the growth figures.

The plan should also include:

1. Clear support for the creation of thriving community facilities which can sustain themselves in the long term.
2. Clear support for making new communities strong, vibrant and well-integrated with existing communities.

Hailsham Town Council should have a set in stone funding for the following:

1. Relief Ring Road before any Wealden District Council planning decisions are made.
2. Provisions for healthcare and education etc
3. etc

Planners should be told to insist the developers provide infrastructure with adequate parking etc for community use and that this should NOT be the subject of negotiation.

Helen Deehan 02.12.2015

To be considered by the chair....

Apologies for my absence. I will make my position clear. As a resident I am not against development, however I am yet to be convinced that the proposed 9,380 is sustainable development. It is the fundamental concept I think we all need to make sure we understand. I am no expert so I hope others will be able to discuss.

I would recommend reading the attached quote from a letter from MP Brandon Lewis to Hailsham resident John Pilgrim

I would then ask the committee to read page 61 & following pages of the proposed local plan which outlines the strategic economic strategy which is a key part of the sustainable development rationale.

Then I have enclosed the two pages of the NPPF which details their view on sustainable development. ( you might want this full document electronically to hand)

My viewpoint is I would challenge the business vision that Wealden appears to be assigning for Hailsham. As we fast loose our agricultural heritage and farming community it seems that an engineering/construction focus seems to be a new direction. I cannot find strong evidence to support the need for some of these industries in this location. Also how would this sit along side an 'Eden style project?!?

Referring back to the plan these were the sectors...

Healthcare – specifically in relation to the ageing population;  
Land-Management – linked to the LEP Growth Strategy Strategic Objective of Place, including the visitor economy and high added-value food and drink production;

Digital and media (Creative);  
Engineering / Advanced Manufacturing;  
Engineering / Materials & Electronic Systems;  
Low carbon and environmental goods and services;  
Wholesale/Retail/Motor;

Construction Industry; and  
Financial Sector (Banking, Insurance and Accountancy).

I cannot comment on all these but as someone who held senior management positions in the Digital Media & Creative sector I would have to challenge the long term future of this industry as its a high risk industry being digitally driven allowing access to the global market place e.g contracts are easily lost to overseas business's who have lower operating and staffing costs.

Note for Paul Soane - Chairman

We are all aware of the infrastructure issues and could pen quite quickly the challenges we feel that are faced with the proposed housing numbers. I would happily write education challenges & impact now and in the future along with a councillor if necessary. If areas are assigned to individuals at tonight's meeting please may I be considered for education.

The Government wants to see sustainable development, not development at any cost. The cumulative impact of development and the need for infrastructure to support development, are material considerations in deciding whether development is appropriate. The National Planning Policy Framework asks councils to identify priority areas for viable infrastructure, and work with neighbouring authorities and transport providers to develop plans for its provision, including roads and transport links, water resources and schools.

6. The purpose of the planning system is to contribute to the achievement of sustainable development. The policies in paragraphs 18 to 219, taken as a whole, constitute the Government's view of what sustainable development in England means in practice for the planning system.
7. There are three dimensions to sustainable development: economic, social and environmental. These dimensions give rise to the need for the planning system to perform a number of roles:
  - **an economic role** – contributing to building a strong, responsive and competitive economy, by ensuring that sufficient land of the right type is available in the right places and at the right time to support growth and innovation; and by identifying and coordinating development requirements, including the provision of infrastructure;
  - **a social role** – supporting strong, vibrant and healthy communities, by providing the supply of housing required to meet the needs of present and future generations; and by creating a high quality built environment, with accessible local services that reflect the community's needs and support its health, social and cultural well-being; and
  - **an environmental role** – contributing to protecting and enhancing our natural, built and historic environment; and, as part of this, helping to improve biodiversity, use natural resources prudently, minimise waste and pollution, and mitigate and adapt to climate change including moving to a low carbon economy.

8. These roles should not be undertaken in isolation, because they are mutually dependent. Economic growth can secure higher social and environmental standards, and well-designed buildings and places can improve the lives of people and communities. Therefore, to achieve sustainable development, economic, social and environmental gains should be sought jointly and simultaneously through the planning system. The planning system should play an active role in guiding development to sustainable solutions.
9. Pursuing sustainable development involves seeking positive improvements in the quality of the built, natural and historic environment, as well as in people's quality of life, including (but not limited to):
  - making it easier for jobs to be created in cities, towns and villages;
  - moving from a net loss of bio-diversity to achieving net gains for nature;<sup>6</sup>
  - replacing poor design with better design;
  - improving the conditions in which people live, work, travel and take leisure; and
  - widening the choice of high quality homes.
10. Plans and decisions need to take local circumstances into account, so that they respond to the different opportunities for achieving sustainable development in different areas.

### The presumption in favour of sustainable development

11. Planning law requires that applications for planning permission must be determined in accordance with the development plan unless material considerations indicate otherwise.<sup>7</sup>
12. This National Planning Policy Framework does not change the statutory status of the development plan as the starting point for decision making. Proposed development that accords with an up-to-date Local Plan should be approved, and proposed development that conflicts should be refused unless other material considerations indicate otherwise. It is highly desirable that local planning authorities should have an up-to-date plan in place.
13. The National Planning Policy Framework constitutes guidance<sup>8</sup> for local planning authorities and decision-takers both in drawing up plans and as a material consideration in determining applications.