RESPONSE TO THE IMPACT OF THE NPPF ON THE PROPOSED CORE SRATEGY

by Jennifer Owen & Associates on behalf MR A. CHECKLEY

1. **Positive Planning. (paragraph 14 of NPPF).** The CS makes no allowance for sites failing to come forward and therefore the annual housebuilding target not being met. With regard to employment development the Council's approach has been to limit employment allocations to housebuilding and to a rate which reflects previous average uptake. This is not positive planning for a District where, in the south of which in particular, unemployment and wages are certainly below the average for the South East of England.

2. Positive planning requires further allocations of employment land in order to provide choice and to ensure that prospective employers have every encouragement to locate in the District. Also that a move can be made to grow in a different direction from the existing low wage economy in this area based on tourism etc.

3. **Objectively assessed needs (paragraph 14 of NPPF)**. The Council have not objectively assessed their needs, choosing to ignore both the SEPlan housing figures and also the higher population projections. This has had a significant knock on effect in respect of employment land provision which the Council have based on their proposed (and low) housing figures. As set out above this is not acceptable and significant further work is needed to ensure that all the employment needs of the District including those relating to existing businesses and the low wage economy are met.

4. **Adverse impacts must significantly and demonstrably outweigh benefits.(paragraph 14 of NPPF).** The most significant adverse impacts identified by the Council relate to the potential impact of increased traffic on air quality at the Ashdown Forest and foul water discharge into the Pevensey Levels.

5. With regard to the Pevensey Levels and the discharge from the treatment works at Hailsham the Council have the opportunity to redistribute and even increase development in South Wealden by giving priority to sites where on site treatment is achievable and which do not discharge into the Pevensey Levels. This option has been rejected by the Council which has

followed advice by the Environment Agency derived from Circular 3/99[1] which advocates a preference for mains sewerage. This approach has been supported by the Environment Agency. However, it is apparent that in preferring the disposal of foul water to the Hailsham plants no account has been taken of the reduced risk associated with disposal from on site treatment plants to watercourses which do not discharge to intimation ecologically designated areas.

6. It cannot be the case that on site treatment should be rejected without consideration being given to where the mains collected and treated foul sewerage will be discharged. It should be noted that circular 3/99 pre-dated the Strategic Environmental Assessment Directive which was introduced into the UK in 2004. It is, therefore, the case that the Council's development distribution strategy must be reconsidered and the SEA for the CS must consider a revised distribution strategy based on a mixture of onsite foul sewage treatment and treatment at the Hailsham works. It will then be possible to consider whether the clear benefits of increasing development within the CS to meet identified employment and housing needs are outweighed significantly by the adverse impacts as now required the NPPF.

7. **Proactively drive and support sustainable economic development to deliver the homes, business and industrial units, infrastructure and thriving local places that the country needs. (paragraph 17 of the NPPF)**. The CS in dealing with economic development merely provides for the status quo. It is not a proactive document and makes no provision for businesses wishing to locate into the district whose needs cannot be met from the very limited employment provision in the CS.

8. **Actively manage patterns of growth to make fullest possible use of public transport, walking and cycling (paragraph 17 of the NPPF).** The failure to capitalise on the excellent public transport opportunities at Polegate by identifying a strategic employment growth point is a major shortfall in the CS and demonstrates non compliance with this part of the NPPF.

9. **Significant weight should be placed on the need to support economic growth (paragraph 19 of the NPPF).** The CS and background documents place significant emphasis on the social

[1] Planning Requirement in respect of the Use of Non-Mains Sewerage incorporating Septic Tanks in New Development

and environmental aspects of the District but pay insufficient attention to the support of economic growth.

10. **Set out a clear economic vision and strategy for their area which positively and proactively encourages sustainable economic growth (paragraph 21 of the NPPF)**. Again this is lacking in the CS which cannot be found sound as it is not compliant with the NPPF.

11. **Set criteria or identify strategic sites , for local and inward investment to match the strategy and meet anticipated needs over the plan period (paragraph 21 of the NPPF)**. AS set out above strategic employment sites have not been identified. At Polegate the small employment allocation at Mornings Mill Farm and the proposal to extend the existing employment site at Dittons Road is insufficient in respect of this requirement of the NPPF.

12. **Boost significantly the supply of housing and use their evidence base to ensure that their Local plan meets the full, objectively assessed needs for market and affordable housing in the housing market area... (paragraph 47 of the NPPF)**. The CS Inquiry heard much evidence concerning this topic and the failure of the Council in respect of overall housing allocations but in particular the requirement to meet affordable housing needs within the area is evident.

13. Local plans should set out the strategic priorities for the area in the Local Plan. This should include strategic policies to deliver
    - The homes and jobs needed in the area; (paragraph 156 of the NPPF). Currently the CS does not meet this requirement as set out above.

14. The overarching theme of the NPPF is that of sustainable development. This falls into three separate strands as set out below
    a. The Economic Role. This is clearly defined in the NPPF and the CS currently does not properly identify either the local requirements, see 1 above, or strategic employment sites/criteria by which strategic sites can come forward.
    b. The Social Role. The amount of housing both market and affordable identified in the plan is inadequate to meet local needs.

c. The Environmental Role. As set out above the Council have failed to properly investigate the alternatives to foul water treatment at the Hailsham works and the implications for increasing development in South Wealden.

15. The balancing exercise. The NPPF is quite clear that the three roles must be considered together. In the case of the Wealden CS it is clear that more development, thereby improving economic and social well being, can be achieved in South Wealden with the potential to reduce environmental impact through diverting and not increasing sewage discharge into the Pevensey Levels.

16. It cannot be the case that a Circular produced in 1999 which has not been subject to SEA should be used by the Council and the EA to delay important positive development in South Wealden.

17. **Conclusion: The CS as it currently stands is not compliant with the NPPF and, therefore, in the circumstances cannot be found to be sound.**

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