Your Ref: N/A
Our Ref: N/A

David Phillips
Head of Planning and Environmental Policy
Wealden District Council
Freepost SEA 10959
Crowborough
East Sussex
TN6 1BR

12 June, 2012

Dear Mr Phillips

Wealden District (Incorporating part of the South Downs National Park) Representations on the Proposed Modifications to the Core Strategy

Please find enclosed a series of completed representation forms in relation to the consultation on the Proposed Modifications to the Core Strategy.

Eastbourne Borough Council [hereafter referred to as EBC] welcomes the opportunity to comment on Wealden and the South Downs National Park's Proposed Modifications to its Core Strategy. EBC notes the main modifications suggested by WDC and the SDNPA (set out in the Proposed Modifications to the Core Strategy Development Plan Document) and is broadly supportive of the changes advocated. EBC considers these main modifications help to enhance the plan and provide clarity on the outstanding issues.

The key modifications that EBC wishes to make comments on relate to the Inspector's conclusions set out in paragraph 20 of his letter dated 5th March, 2012. The response deals specifically with the following issues:

- *"Clarify that the CS does not provide a demographic-based case for departing from housing provision in the SEP",*
- *"Bring forward the end date of the plan to 2027 (with adjustments to the housing trajectory"; and*
- *"Introduce a clear commitment to an early review of the CS where there is more clarity over a preferred solution to the Hailsham WWTWs issue, which will include a re-appraisal of housing requirements."*

The Inspector's letter also sets out additional proposed modifications dealing with issues relating to the identification of Suitable Alternative Natural Greenspaces (SANGs), the nitrogen deposition in Ashdown Forest, the deletion of an urban extension north-west of Heathfield (SD11) and the deletion of a contingency site at Crowborough. However, EBC is broadly content that these do not have any substantive implications for Eastbourne and has no further comment to make on these.

EBC supports the Inspector's decision to bring clarity to the housing situation, which is considered a useful way of helping refine the position in the southern part of Wealden.

The Inspector's acknowledgement of existing infrastructure constraints is supported and the decision to recommend approval of the document subject to a series of main modifications and the inclusion of a clear commitment to review the plan is an appropriate and pragmatic approach that ensures a sound plan whilst enabling a degree of flexibility to address changing circumstances as and when they occur.

In light of the above, EBC would like to comment on the following Main Modifications, which include those proposed by WDC and the SDNPA (with a "WS" reference) and those further modifications made by the inspector (with an "MM" reference). EBC's responses have been set out on the Proposed Modifications Representation Form and including responses to the following:

- WS4
- WS9
- WS26
- WS44
- MM1/3/5/7/8/9/10/11/12/13/15/16/19/21/22/32
- MM4
- MM14

I trust that the above and enclosed are self-explanatory. However, if you require clarification on anything submitted, please do not hesitate to contact Iona Cameron or me.

Yours sincerely

William Nichols
Principal Planning Policy Officer

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Wealden District (Incorporating part of the South Downs National Park) Representation on the Proposed Modifications to the Core Strategy

Working in Partnership

This response relates to the proposed modification	
MM 1, 3, 5, 7, 8, 9, 10, 1, 12, 13, 15, 16, 19, 21 and 22 and 32: Bring forward the end date of the plan to 2027 (with adjustments to the housing trajectory)	**WS**
(Please add numeric reference e.g. MM22 or Wealden District Council/ South Downs National Park Authority modification WS e.g. WS 23)	

Declaration:	I consider the proposed modification will assist the submitted Core Strategy to be found sound ☒ /unsound ☐ (*place a cross in the box to show which option you have chosen) for the following reasons:

Reasons Given:	A large number of the Inspector's main modifications relate to the issue of bringing forward the end date of the plan to 2027. EBC's comments relate to each of the above main modifications, which amend the end date of the plan period. EBC supports the Inspector's proposed main modification to bring forward the end dates of the plan from 2030 to 2027 so that it runs for fifteen years, rather than eighteen years. Whilst the guidance originally set out in PPS12 and more recently in the new National Planning Policy Framework, suggests that local planning authorities can plan for longer than a 15-year period, this should only take place in specific circumstances. Given the significant infrastructure issues and uncertainties that exist within the southern part of Wealden, the inspector has proposed to limit the plan period to fifteen years and this appears to represent an appropriate time-span. A consequence of reducing the length of the plan-period will be that the rate of development is increased. This will help to ensure that the much needed housing identified in the Strategic Housing Market Assessment and required in the sub-region is delivered quickly. This approach increases the rate of development rather than the amount of the development but it also helps to ensure that the necessary housing is delivered over a 15-year period from 2012-2027. In addition, this approach will bring Wealden's Core Strategy's timescale in line with Eastbourne's Core Strategy, which sets out a spatial development strategy up to 2027. Evidently this significant modification will require adjustments to the housing trajectory, which under the original South East Plan figure sought to deliver 11,000 dwellings or 550 dwellings per annum between 2006 and 2026. Wealden District Council's Submission Core Strategy significantly reduced the annual delivery rate both by reducing the overall housing numbers but also by extending the plan period. The Submission Core Strategy sought to deliver 9,600 dwellings or 400 dwellings per annum between 2006 and 2030. The inspector's main modifications that bring forward the end date of the plan to 2027 effectively increase the "dwellings per annum" figure from 400 to 450 by requiring at least 9,440 dwellings between 2006 and 2027.

Wealden District (Incorporating part of the South Downs National Park) Representation on the Proposed Modifications to the Core Strategy

Working in Partnership

This response relates to the proposed modification	
MM 4 (Paragraph 3.10)	**WS**
(Please add numeric reference e.g. MM22 or Wealden District Council/ South Downs National Park Authority modification WS e.g. WS 23)	

Declaration:	I consider the proposed modification will assist the submitted Core Strategy to be found sound ☒ /unsound ☐ (*place a cross in the box to show which option you have chosen) for the following reasons:

Reasons Given:	EBC notes that the Inspector has acknowledged that there is no demographic basis to support lower housing provision than that in the South East Plan and that the reduction in housing provision from 11,000 dwellings to 9,440 cannot be justified purely on the basis of 'need'. EBC recognises that Wealden's original housing figure set out in the South East Plan was underpinned by a robust evidence base, which set out an overall housing requirement based upon a clear demonstrable need. EBC therefore accepts that there is no demographic-based case for departing from the South East Plan housing figure of 11,000 dwellings across Wealden (including 7,000 in the Sussex Coast Sub Region) and has no 'in principle' objection to maintaining the South East Plan, if it can be clearly demonstrated that the waste water treatment and transport infrastructure to support this level of growth can be provided and that other issues such as the coalescence of settlements, landscape impact, flood risk, drainage can be satisfactorily resolved. EBC does have a specific concern about the precise nature of SDA6: Land at Stone Cross and considers that the urban extension should take place to the north of the railway line to avoid the coalescence of settlements. EBC does, however, appreciate that this is outside the scope of this main modifications consultation and that the concerns will be given due consideration in Wealden's Strategic Sites DPD. A report for which will be presented to the Local Development Framework Committee in July, 2012.

Wealden District (Incorporating part of the South Downs National Park) Representation on the Proposed Modifications to the Core Strategy

Working in Partnership

This response relates to the proposed modification	
MM 14 (Policy WCS1)	**WS**
(Please add numeric reference e.g. MM22 or Wealden District Council/ South Downs National Park Authority modification WS e.g. WS 23)	

Declaration:	I consider the proposed modification will assist the submitted Core Strategy to be found sound ☒ /unsound ☐ (*place a cross in the box to show which option you have chosen) for the following reasons:

Reasons Given:	EBC reiterates its support for Wealden's Core Strategy (set out in its Matter Statements to the Examination in Public), which is considered to represent an appropriate and desirable approach to future growth in Wealden. EBC has worked closely and positively with Wealden District Council throughout the plan-making process and in accordance with the requirements set out in the recently published National Planning Policy Framework. EBC share Wealden District Council's concerns about the uncertainty of the Hailsham Waste Water Treatment Works (WWTW) and whether or not a plant could be delivered over the plan period to address the additional growth proposed in the South East Plan. Failure to provide sufficient delivery of necessary infrastructure to support the level of housing and employment growth has the potential to lead to significant capacity issues that could impact on entire communities and place considerable strain on the existing infrastructure. EBC therefore welcomes the Inspector's conclusion set out in paragraph 9 of his letter of 5th March, 2012, which confirmed that he was "satisfied that the evidence is not available that would support different assumptions being made to those used by the Council, the Environment Agency (EA) and Southern Water" and that "Until the capacity issue is resolved [he] consider[s] that there is a limit on the scale of development in south Wealden that can be served by these works." In light of this significant infrastructure issue, it would be inappropriate to continue with the South East Plan housing figure of 11,000 dwellings between 2006 and 2026. EBC notes that the Inspector has set out a clear commitment to an early review of the Core Strategy. This is an appropriate response and strikes the correct balance between the need for housing and the constraints that currently exist in the southern part of Wealden. EBC supports MM14, which reflects the existing uncertainty about infrastructure coming forward adding a third paragraph to Policy WCS1 and states that "The strategy shall be reviewed in 2015 or when a preferred solution to the capacity issues associated with Hailsham North and Hailsham South Wastewater Treatment Works has been identified, whichever is the earlier…" However, EBC would wish to stress that if the review continued to identify infrastructure shortages, it would not support additional housing allocations over and above the 9,440 figure recommended by the Inspector.

Wealden District (Incorporating part of the South Downs National Park) Representation on the Proposed Modifications to the Core Strategy

Working in Partnership

This response relates to the proposed modification	
MM	**WS 4 (WCS4: Strategic Development Areas)**
(Please add numeric reference e.g. MM22 or Wealden District Council/ South Downs National Park Authority modification WS e.g. WS 23)	

Declaration:	I consider the proposed modification will assist the submitted Core Strategy to be found sound ☒ /unsound ☐ (*place a cross in the box to show which option you have chosen) for the following reasons:

Reasons Given:	EBC supports the inclusion of additional text to Policy WCS4: Strategic Development Areas, which brings transparency on the type and scale of development being proposed at each of the District's twelve strategic development areas. The additional wording enables the reader to clearly identify and compare the levels of housing and employment development across the strategic development areas.

If this is a new matter that you have raised please complete the following

I wish ☐ / do not wish ☒ (*place a cross in the box to show which option you have chosen) for this matter to be heard in front of the Inspector

Signed:	William Nichols
Name and Address:	William Nichols Principal Planning Policy Officer

Wealden District (Incorporating part of the South Downs National Park) Representation on the Proposed Modifications to the Core Strategy

Working in Partnership

This response relates to the proposed modification	
MM	**WS 9 (Paragraph 5.16)**
(Please add numeric reference e.g. MM22 or Wealden District Council/ South Downs National Park Authority modification WS e.g. WS 23)	

Declaration:	I consider the proposed modification will assist the submitted Core Strategy to be found sound ☒ /unsound ☐ (*place a cross in the box to show which option you have chosen) for the following reasons:

Reasons Given:	EBC supports the proposed amendments to the text in the second and fourth bullet points of the proposed new paragraph 5.17, which state respectively that: • "Development at Stone Cross will be subject to the provision of necessary transport infrastructure enhancements in south Wealden. • "Development at south Polegate and east Willingdon (SD4) will be contingent upon transport infrastructure requirements and interventions in south Wealden". This broad approach recognises the importance of transport infrastructure and seeks to ensure that in order for development to take place, the necessary transport infrastructure improvements set out in Wealden's Infrastructure Delivery Plan will be required. There is, however, some uncertainty as to why the text differs for both strategic areas and furthermore why reference to SDA6 and SDA7 is omitted from the second bullet point. Unless there is a specific reason to the contrary, in order to maintain consistency, additional text should be added so that each bullet point reads in the same way.

If this is a new matter that you have raised please complete the following

I wish ☐ / do not wish ☒ (*place a cross in the box to show which option you have chosen) for this matter to be heard in front of the Inspector

Wealden District (Incorporating part of the South Downs National Park) Representation on the Proposed Modifications to the Core Strategy

Working in Partnership

This response relates to the proposed modification	
MM	**WS 26 (Paragraph 6.42)**
(Please add numeric reference e.g. MM22 or Wealden District Council/ South Downs National Park Authority modification WS e.g. WS 23)	

Declaration:	I consider the proposed modification will assist the submitted Core Strategy to be found sound ☒ /unsound ☐ (*place a cross in the box to show which option you have chosen) for the following reasons:

Reasons Given:	EBC supports 'in principle' the proposed additional wording to paragraph 6.42, which clearly seeks to clarify the role that the Site Allocations DPDs will have in developing future policies. However, to provide further clarification and in order to avoid confusion between the two "site allocations" DPDs, the text should be amended to read: "The strategy provides the context for the development of future policies in the Strategic Sites DPD, and the Site Allocations and Policies DPD and seeks…"

If this is a new matter that you have raised please complete the following

I wish ☐ / do not wish ☒ (*place a cross in the box to show which option you have chosen) for this matter to be heard in front of the Inspector

Signed:	William Nichols
Name and Address:	William Nichols Principal Planning Policy Officer

Wealden District (Incorporating part of the South Downs National Park) Representation on the Proposed Modifications to the Core Strategy

Working in Partnership

This response relates to the proposed modification	
MM	**WS 44 (Key Diagram)**
(Please add numeric reference e.g. MM22 or Wealden District Council/ South Downs National Park Authority modification WS e.g. WS 23)	

Declaration:	I consider the proposed modification will assist the submitted Core Strategy to be found sound ☒ /unsound ☐ (*place a cross in the box to show which option you have chosen) for the following reasons:

Reasons Given:	EBC supports the deletion of the wording that states that SD6 and SD7 will be "phased from around 2015 to 2027". This recognises that development in both these strategic development areas will be subject to the provision of necessary infrastructure requirements in the southern part of Wealden and the changes to Figure 5: Phasing of Development proposed by Wealden District Council and consequently may not come foreword as early as 2015.

If this is a new matter that you have raised please complete the following

I wish ☐ / do not wish ☒ (*place a cross in the box to show which option you have chosen) for this matter to be heard in front of the Inspector

Signed:	William Nichols
Name and Address:	William Nichols Principal Planning Policy Officer

E-Mail Address:	
If on behalf of a company, please state:	Eastbourne Borough Council
Date:	12th June, 2012

Please place a cross in the box to show which option you have chosen	
I would wish to be notified of the publication of the recommendations of any person appointed to carry out an independent examination of the Core Strategy	Yes ☒ No ☐
I would wish to be notified of the adoption of the Core Strategy	Yes ☒ No ☐

Note: If completing this in hardcopy form, please use additional sheets if necessary.

Please return this form by **5pm on Wednesday 13th June 2012**:

By post to: Head of Planning and Environmental Policy, Wealden District Council, Freepost SEA 10959, Crowborough, East Sussex, TN6 1BR

By email to: ldf@wealden.gov.uk

Data Protection Act 1998 and Freedom of Information Act 2000
Representations cannot be treated in confidence. Regulation 30 of the Town and Country Planning (Local Development) (England) Regulations 2004, as amended, requires copies of all representations to be made publicly available. The Council will also provide names and associated representations on its website but will not publish personal information such as telephone numbers, e-mails or private addresses. By submitting a representation on the Proposed Modifications you confirm that you agree to this and accept responsibility for your comments.

Please telephone 01892 602007 or e-mail ldf@wealden.gov.uk if you require assistance in submitting your representation or if further information is required. If you, or somebody you know, would like the information (guidance notes, forms etc) in large print, braille, audio tape/CD or in another language please let us know.