12 April 2012

Lynette Benton
Programme Officer
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BY EMAIL ONLY

Dear Mrs Benton

Wealden District Council & South Downs National Park Authority Core Strategy Proposed Modifications
Reference: LDF 0440

On behalf of Heyford Developments Ltd I write in response to the Inspector's and the Council's proposed modifications to the Core Strategy in order to make it "sound". I also write in response to the recently published National Planning Policy Framework.

In effect, the limit in the capacity of the North Hailsham Waste Water Treatment Works and the concern over the environmental impact on the Pevensey Levels is the 'cork in the bottle' that constrains the Council from meeting the South East Plan's housing requirements for the South Coast Sub Region set out under Policy H1. The Inspector has recognised this and whilst accepting the evidence of the Council, Southern Water and the Environment Agency his proposed modifications are to ensure that a housing review takes place in 2015, when it is expected that the results of modelling, survey and options work by Southern Water and the Environment Agency would have been published.

Whilst the Inspector's modifications seek to address the current constraints to housing delivery in East and North Hailsham they rely on Southern Water completing their scheduled work and identifying and implementing outcomes based upon a number of financial and other factors, some of which are outside Southern Water's control. Firstly, Southern Water's track record is one of prevarication: In 2006, at the EiP into the South East Plan, the capacity constraints at North Hailsham were known, but no remedial action has taken place in 6 years. Secondly, until capacity is actually reached Southern Water would not be making any funding bid to Ofwat or seeking to increase capacity through major capital works because it would not need to. Southern Water's responses to housing growth are retrospective/reactionary.

It is our recommendation that the Inspector's proposed modifications should be as 'directional' as possible so that there would be no doubt that from 2015 it would be expected that new housing would come forward in East and North Hailsham and that there would be provision made in waste water infrastructure to accommodate the pace and scale of new housing development. This should encourage Southern Water to make appropriate provision.

The Inspector's proposed modifications to ensure a housing review around 2015 takes place has not resulted in any real commitment or response from the Council. There are no

suggested wording changes in the Council's modifications that indicate that should capacity become available after 2015, and subject to a housing review, the Council will seek to increase the average annual housing supply to the levels anticipated in the SEP through to 2027. In other words, the Council should commit to producing a DPD that would result in new housing sites coming forward in North Hailsham that would increase the scale and pace of housing delivery for the latter part of the Core Strategy period.

The Council's current Draft Strategic Sites DPD seeks to 'choose' between sites within the SD2 area to meet the current housing requirements. We recommend that the Council's proposed modifications should not only commit to increasing the scale and pace of housing delivery after the results of the Southern Water and Environment Agency reviews, and the implementation of their recommended measures, but they should also identify those sites within the SD2 area that although might not be chosen in the current SPD, they would be chosen after the review.

This recommendation seeks to ensure the increased provision of housing supply in the post 2015 period of the Core Strategy within East Hailsham (to catch up on shortfall and meet the requirements of SEP Policy H1) and chooses sites already within the SD2 area to enable certainty and consistency. The 'area' of search which has already been identified in the Core Strategy would reduce the delay and uncertainty of new sites being promoted that are currently outside the SD2 area.

In support of our recommendations we draw upon the NPPF. The NPPF seeks to "boost significantly the supply of housing" (Para 47). The NPPF requires local planning authorities to include strategic policies to deliver waste management, water supply and wastewater..." (Para 156). The NPPF seeks an additional 5% buffer for housing supply above housing requirements and a 20% buffer for housing where local planning authorities have persistently under delivered on housing supply.

Should you have any queries or require further comments please let me know.

Yours sincerely,

Vic Hester