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

PHD Chartered Town Planners on behalf of MarkStephen Limited

This response relates to the Proposed Modifications of Mr Michael Moore (the Inspector)

MM √ **WS √**

Overarching Objection to soundness

Declaration:	I consider the proposed modifications will assist the submitted Core Strategy to be found **unsound** for the following reasons:

Reasons Given:	These comments are made in the context of the replacement of all PPGs and PPSs as well as certain other circulars and advice notes with the National Planning Policy Framework (the Framework). We have already made representations on the Framework and its relationship to the draft Core Strategy and concluded that the range and nature of the conflicts between the emerging CS and the Framework are such that either the CS should be found to be unsound and not fit for purpose or the Hearing should be re-opened in order that participants can be heard in order that such matters are fully explored ahead of the formal deliberations of the Inspector. Failure to hear these representations would, in our respectful view, substantially prejudice participants and undermine participation in the planning process. In particular we have noted the aim of the Framework set out at paragraph 47 is to boost the supply of housing whilst the CS seeks to restrain housing growth without exploring how planning policy can facilitate greater growth. The CS fails to meet the full objectively based need for either market or affordable housing, indeed the total proposed annual housing growth figures fail to provide much more than half the annual affordable housing need of the District (which has persistently failed to meet its housing needs). Rather than repeating them, all our representations should be read in conjunction with our comments relating to the Framework as articulated in our letter of 16 May 2012. The Inspector has raised issues of concern and concluded fairly that the Council's housing projections do not provide a robust demographic basis that justifies departing from the housing provision in the South East Plan. The Council do not provide any alternative basis for such a deviation over the whole plan period and have not tested higher levels of provision above that they advocate. On this basis, having regard to the pre Hearing meeting and continued invitations to the Council, the only reasonable course of action is to find the plan to be unsound.

	The only alternative is to re open the Hearing to explore the options open to the Council and debate the options of reducing the time period of the plan, the appropriate length of time for the plan, the phasing of development during the plan period, the testing of higher housing allocation numbers and overall housing numbers. Any alternative course of action would significantly prejudice the interests of the public and development industry as no debate was aired regarding these factors at the Examination in Public. Introducing a need to review housing provision in 2015 is tantamount to an acknowledgement that the housing strategy of the CS is unsound and that the Council should have proactively engaged and investigated comprehensively such matters ahead of producing their CS. The plan should either expire in 2015 or make provision for increased housing beyond 2020 contingent upon infrastructure improvements at North and South Hailsham WWTPs. This latter approach would provide the certainty craved by the statutory undertakers who sought the proper planning for housing to come ahead of their need to plan and provide for the infrastructure to serve that development. The game of chicken and egg that has evolved in this case has resulted in the housing needs of the District taking a back seat in this process. It would also provide greater certainty for the development industry and the public who are supposed to be operating in a plan led system of planning. The planning system is awaiting commitment from the statutory undertakers and the statutory undertakers are awaiting assurances from the planning system about housing numbers, it seems no one is willing to provide leadership. This is a failure of the planning system and not the statutory undertakers as the planning regime is supposed to be plan led and not statutory undertaker led. The plan is manifestly unsound and unfit for purpose. This CS would not be in any sense aspirational nor contribute toward achievement of sustainable development as defined in the Framework. Significant adverse impacts to sustainable development in terms of meeting the housing needs of the community and exacerbating existing shortfalls would not be unavoidable and no mitigation measures are proposed. The plan does not identify opportunities for development to meet the housing needs of the District and seeks to avoid addressing such matters. The plan fails to meet its strategic priority or policy to deliver the homes needed in the area (156), notably what the plan fails to do (in a plan led system) is plan positively for the development and infrastructure required in the area during the plan period (157).

	Given the fact that infrastructure cannot come forward in the plan period it is inexplicable why the plan should extend to a period of 21 or 24 years, there is no need for the plan to extend beyond 15 years and a significant argument that the plan period can exceptionally be limited to 2015 when the approach of statutory undertakers will be known. The plan (for all the reasons set out above and in the detailed objections to follow) cannot be considered to be based on adequate, up to date or relevant evidence. The evidence regarding housing fails to take full account of relevant and economic signals (158). The Council's understanding of housing need is flawed and unsound, it does not meet household or population projections or take account of migration and demographic changes. Of greatest note is that the plan fails to address all types of housing including affordable housing and fails to cater for housing demand and the scale of housing supply necessary to meet this demand (159).

I wish for this matter to be heard in front of the Inspector.

Signed:	

Name and Address:	Phillip E Hughes BA(Hons) MRTPI Ph.D Dip Man MCMI
E-Mail Address:	
On behalf of:	MarkStephen Limited
Date:	8 June 2012

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
I would wish to be notified of the adoption of the Core Strategy	√ Yes

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

PHD Chartered Town Planners on behalf of MarkStephen Limited

This response relates to the Proposed Modification:

MM 3 **WS**

Declaration:	I consider the proposed modifications will assist the submitted Core Strategy to be found **unsound** for the following reasons:

Reasons Given:	The modification of the plan period to 2027 would reduce the time over which the plan relates by three years so a plan that runs from 2006 to 2027 and would run for 21 years. However given the previous advice in PPS12 and the current guidance in the Framework allied to the need to review and the parlous state of housing provision in the District it is difficult to understand why any period beyond 15 years is being considered (in this case 2006 – 2021). Indeed a much shorter period would seem to be justified given the fact that a review is proposed in 2015 (2006 – 2015). The proposed amendment would not address the fundamental failure of the plan to provide housing to meet the identified housing needs of the District and as such it fails to overcome the unsoundness of this plan. The need to review the plan within 2 – 3 years of adoption is symptomatic of the fact that it is not sound or fit for purpose. In any case the duration of the plan is a matter that should be discussed in a public arena as it would have fundamental implications for the ability to plan for the future and meet the needs of the local community and a consensus is required to be reached as to the appropriate length of time for the plan to run.

I wish for this matter to be heard in front of the Inspector.

Signed:	

Name and Address:	Phillip E Hughes BA(Hons) MRTPI Ph.D Dip Man MCMI
E-Mail Address:	

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

PHD Chartered Town Planners on behalf of MarkStephen Limited

This response relates to the Proposed Modification:

MM 4 MM5 MM7 MM8 MM12 MM21 MM22 MM23 MM24 MM32

Declaration:	I consider the proposed modifications will assist the submitted Core Strategy to be found **unsound** for the following reasons:

Reasons Given:	The proposed modification would do little other than reduce the plan period by three years to meet the excessive levels of need for housing in the District and in particular within the South Coastal Sub area. During the plan an increase in population of 19000 – 20000 is predicted with an increase of 16800 households predicted. The Council's response is to provide just 57% of this urgent need (9600). A reduction in the plan period to 2027 could reduce the increase in new household formation by 12.5% or 2100 to 14700. However, delivery of 450 houses per annum during a 21 year plan period would provide just 9440 households or 64% of the demand for new housing. The modification whilst an improvement on the Council's approach still fails to make the plan sound as it manifestly fails to provide for the needs of the District in terms of housing over the plan period. The SEP required the provision of 550 dwellings per annum, this was already a moderated figure allowing for local constraints and as demonstrated a need for 16800 households over the plan period equates to 700 dwellings per annum. The delivery of 450 dwellings per annum would only equate to 13.5 years supply of housing set against the need for 16800 dwellings in the District to 2030. The most satisfactory way to deal with the matter would be to restrict the life of the plan to 2006 to 2020 (i.e. a period consistent with the amount of housing that can be delivered to keep pace with need and a time when the statutory undertaker will be able to satisfactorily report on how they will be able to increase headroom to account for new housing in the area and deliver such infrastructure. Such a reduction still provides a strategic plan outlook as well as giving statutory undertakers more certainty in terms of their long terms planning, funding and investment programmes in terms of the period beyond 2020.

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

PHD Chartered Town Planners on behalf of MarkStephen Limited

This response relates to the Proposed Modification:

MM 14 **WS**

Declaration:	I consider the proposed modifications will assist the submitted Core Strategy to be found **unsound** for the following reasons:

Reasons Given:	This approach whilst preferable to the blind approach of the Council still leaves much doubt in the minds of the development industry, statutory undertakers and most importantly the public. Moreover it reduces the effectiveness of a plan that is intended to run until 2027 or 2030 as effectively it becomes worthless after 2015. The only reasonable and sound response to the issues is either to find the plan unsound given it is not based on a demographic basis and fails to plan for the needs of the District and more particularly the South Coastal Sub Region and is not consistent with the Regional Spatial Strategy. *The review shall include an assessment of current and future levels of need and demand for housing to provide an appropriate basis for longer term housing provision*. Surely it is the role of the plan to make provision for housing provision in the medium and long term and the fact that there is a need for a review is indicative of the fact that the plan is unsound. The introduction of the review clause breaks the period the CS relates to and effectively undermines the soundness, effectiveness and clarity of the plan.

I wish for this matter to be heard in front of the Inspector.

Signed:	

Name and Address:	Phillip E Hughes BA(Hons) MRTPI Ph.D Dip Man MCMI
E-Mail Address:	

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

PHD Chartered Town Planners on behalf of MarkStephen Limited

This response relates to the Proposed Modification:

MM **WS 2**

Declaration:	I consider the proposed modifications will assist the submitted Core Strategy to be found **unsound** for the following reasons:

Reasons Given:	The amendments leave the text making no sense, how would a free for all in terms of the limited proposed housing development in the period 2006 – 2030 with no phasing mechanism "better provide for the timely delivery of infrastructure". The Policy would remain with low ambitions and no incentive to provide more than the 400 dwellings per annum set out in the policy. The policy remains unsound for all the reasons previously considered and those new considerations set out in our covering and overarching objection.

I wish for this matter to be heard in front of the Inspector.

Signed:	

Name and Address:	Phillip E Hughes BA(Hons) MRTPI Ph.D Dip Man MCMI
E-Mail Address:	
On behalf of:	MarkStephen Limited
Date:	8 June 2012

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
I would wish to be notified of the adoption of the Core Strategy	√ Yes

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

PHD Chartered Town Planners on behalf of MarkStephen Limited

This response relates to the Proposed Modification:

MM **WS 3**

Declaration:	I consider the proposed modifications will assist the submitted Core Strategy to be found **unsound** for the following reasons:

Reasons Given:	Further amendments required as there is no brownfield target and PPG3 has been revoked.

I **do not** wish for this matter to be heard in front of the Inspector.

Signed:	

Name and Address:	Phillip E Hughes BA(Hons) MRTPI Ph.D Dip Man MCMI
E-Mail Address:	
On behalf of:	MarkStephen Limited
Date:	8 June 2012

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
I would wish to be notified of the adoption of the Core Strategy	√ Yes

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

PHD Chartered Town Planners on behalf of MarkStephen Limited

This response relates to the Proposed Modification:

MM **WS 4**

Declaration:	I consider the proposed modifications will assist the submitted Core Strategy to be found **unsound** for the following reasons:

Reasons Given:	It remains the view of Mark Stephen Limited that a strategic allocation at South Hailsham should be preferred to either of the provision at Stone Cross (SD6 or SD7) and as such the text should be amended to read either: SD6: Land at South Hailsham - provision of around 220 dwellings SD7: Land at North Stone Cross - provision of around 430 dwellings or SD6: Land at East and South East of Stone Cross - provision of around 220 dwellings with flexibility between SD6 and SD7 SD7: Land at North Stone Cross - provision of around 230 dwellings with flexibility between SD6 and SD7 SD13: Land at South Hailsham - provision of around 200 dwellings Either scenario would remain within the capacity levels of the local waste water treatment plant and if more capacity was to be indentified then housing numbers could be increased at some or all of the sites. As matters stand the allocations fail to reflect Government policy of providing housing in the most sustainable locations given the dearth of facilities provided in the dormitory settlement of Stone Cross. It is also clear that Stone Cross is being promoted to meet the needs of housing from Eastbourne and not the needs of Wealden, the allocation at South Hailsham would help to address such matters and make the plan sound.

I wish for this matter to be heard in front of the Inspector.

Signed:	

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

PHD Chartered Town Planners on behalf of MarkStephen Limited

This response relates to the Proposed Modification:

MM **WS 5**

Declaration:	I consider the proposed modifications will assist the submitted Core Strategy to be found **unsound** for the following reasons:

Reasons Given:	The amendments leave a free for all in terms of the limited proposed housing development in the period 2006 – 2030 with no phasing mechanism other than being able to condition permissions to ensure they do not come ahead of infrastructure improvements it is unclear how this change would "*better provide for the timely delivery of infrastructure*". Figure 5 indicates that no housing from any strategic site would come forward until 2016 at the very earliest. Given the plan runs from 2006 to 2026 (as proposed by the Inspector) that means no strategic housing allocation would be delivered until the second half of the plan period. Housing from a South Hailsham allocation can come forward in the short term delivering housing in the year 2014/15 The policy and its supporting text remains unsound and ill conceived for all the reasons previously considered and those new considerations set out above and in our overarching objection.

I wish for this matter to be heard in front of the Inspector.

Signed:	

Name and Address:	Phillip E Hughes BA(Hons) MRTPI Ph.D Dip Man MCMI
E-Mail Address:	
On behalf of:	MarkStephen Limited
Date:	8 June 2012

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

PHD Chartered Town Planners on behalf of MarkStephen Limited

This response relates to the Proposed Modification:

MM **WS 8**

Declaration:	I consider the proposed modifications will assist the submitted Core Strategy to be found **unsound** for the following reasons:

Reasons Given:	The note in respect of the South Hailsham WWTP makes no sense as the numbers proposed relate to the level of alleged headroom within the existing facility and are therefore already constrained. No part of the table or policy relates to an increase in capacity at the strategic sites or the provision of alternative sites. Figure 5, Policy WCS4 and supporting text should be amended to make provision for additional strategic locations for housing subject to increased capacity being provided at the WWTP. In particular it should be amended to read (albeit in the first instance we say South Hailsham should be uninhibited and Stone Cross should come forward as a provisional allocation): *Subject to increased capacity being provided at the South Hailsham WWTP the following strategic allocation should come forward in the period 2016 – 2026:* *SD13: Land at South Hailsham - provision of around 200 dwellings* Such an approach would give greater certainty during the plan period and provide greater flexibility within the plan to increase housing to meet the housing needs of the District.

I wish for this matter to be heard in front of the Inspector.

Signed:	

Name and Address:	Phillip E Hughes BA(Hons) MRTPI Ph.D Dip Man MCMI

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

PHD Chartered Town Planners on behalf of MarkStephen Limited

This response relates to the Proposed Modification:

MM **WS 10**

Declaration:	I consider the proposed modifications will assist the submitted Core Strategy to be found **unsound** for the following reasons:

Reasons Given:	There is no mechanism to control release of land save the availability of infrastructure as such this policy is effectively redundant as planning permission would not be granted if infrastructure was not available or could be conditioned to ensure infrastructure was first made available (via a *Grampian* condition).

I **do not** wish for **this** matter to be heard in front of the Inspector.

Signed:	

Name and Address:	Phillip E Hughes BA(Hons) MRTPI Ph.D Dip Man MCMI
E-Mail Address:	
On behalf of:	MarkStephen Limited
Date:	8 June 2012

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
I would wish to be notified of the adoption of the Core Strategy	√ Yes

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

PHD Chartered Town Planners on behalf of MarkStephen Limited

This response relates to the Proposed Modification:

MM **WS 28**

Declaration:	I consider the proposed modifications will assist the submitted Core Strategy to be found **unsound** for the following reasons:

Reasons Given:	The CS provides no incentive for infrastructure providers or the Council to work to make greater capacity at the WWTPs as the plan until 2030 will not lead to deficiencies in waste water treatment plant capacity. As matters stand the plan will provide for deficient housing numbers to 2030 or 2026 and it is only at that point having under delivered for over 30 years that the issue of infrastructure capacity will be visited and there is no certainty (especially from this plan) that capacity will be available beyond 2030 or 2026 to provide any housing in excess of the provision allowed for in this plan. The plan is unsound and fails to meet housing need or provide any mechanism to increase housing provision to meet need during its lifetime. It also leaves great uncertainty about provision beyond the life of the plan with the likely outcome infrastructure providers being in the same position as now in 2026 and 2030 striving for certainty in order to make plans and invest.

I wish for this matter to be heard in front of the Inspector.

Signed:	

Name and Address:	Phillip E Hughes BA(Hons) MRTPI Ph.D Dip Man MCMI
E-Mail Address:	
On behalf of:	MarkStephen Limited
Date:	8 June 2012

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

PHD Chartered Town Planners on behalf of MarkStephen Limited

This response relates to the Proposed Modification:

MM **WS 29**

Declaration:	I consider the proposed modifications will assist the submitted Core Strategy to be found **unsound** for the following reasons:

Reasons Given:	Without identifying clearly the level of need for new housing the provision of 7.6 are toothless and mean nothing as the Council's default position is that they are meeting their housing needs.

I wish for this matter to be heard in front of the Inspector.

Signed:	

Name and Address:	Phillip E Hughes BA(Hons) MRTPI Ph.D Dip Man MCMI
E-Mail Address:	
On behalf of:	MarkStephen Limited
Date:	8 June 2012

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
I would wish to be notified of the adoption of the Core Strategy	√ Yes

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

PHD Chartered Town Planners on behalf of MarkStephen Limited

This response relates to the Proposed Modification:

MM **WS 36**

Declaration:	I consider the proposed modifications will assist the submitted Core Strategy to be found **unsound** for the following reasons:

Reasons Given:	Does not read properly needs amending further.

I **do not** wish for this matter to be heard in front of the Inspector.

Signed:	

Name and Address:	Phillip E Hughes BA(Hons) MRTPI Ph.D Dip Man MCMI
E-Mail Address:	
On behalf of:	MarkStephen Limited
Date:	8 June 2012

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
I would wish to be notified of the adoption of the Core Strategy	√ Yes

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

PHD Chartered Town Planners on behalf of MarkStephen Limited

This response relates to the Proposed Modification:

MM **WS 38**

Declaration:	I consider the proposed modifications will assist the submitted Core Strategy to be found **unsound** for the following reasons:

Reasons Given:	This means nothing and could result in no change to capacity. The text needs to be amended to state that the aim is to provide greater capacity for new housing and employment space during the plan period and before 2020 to make provision for an additional 2000 homes during the plan period within the South Coastal area. Only then will this plan bring forward any degree of certainty rather than vague platitudes and possible talks about talks.

I wish for this matter to be heard in front of the Inspector.

Signed:	

Name and Address:	Phillip E Hughes BA(Hons) MRTPI Ph.D Dip Man MCMI
E-Mail Address:	
On behalf of:	MarkStephen Limited
Date:	8 June 2012

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
I would wish to be notified of the adoption of the Core Strategy	√ Yes

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

PHD Chartered Town Planners on behalf of MarkStephen Limited

This response relates to the Proposed Modification:

MM **WS 43**

Declaration:	I consider the proposed modifications will assist the submitted Core Strategy to be found **unsound** for the following reasons:

Reasons Given:	Add Urban extension south of Hailsham at Oaklands (SD13) (residential/ doctors' surgery)

I wish for this matter to be heard in front of the Inspector.

Signed:	

Name and Address:	Phillip E Hughes BA(Hons) MRTPI Ph.D Dip Man MCMI
E-Mail Address:	
On behalf of:	MarkStephen Limited
Date:	8 June 2012

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
I would wish to be notified of the adoption of the Core Strategy	√ Yes

Response to Suggested Amendments of the Inspector and Councils

These comments are made in the context of the revocation of all PPGs and PPSs as well as certain other circulars and advice notes and their replacement with the National Planning Policy Framework (the Framework).

We have already made representations on the Framework and its relationship to the draft Core Strategy and concluded that the range and nature of the conflicts between the emerging CS and the Framework are such that either the CS should be found to be unsound and not fit for purpose or the Hearing should be re-opened in order that participants can be heard in order that such matters are fully explored ahead of the formal deliberations of the Inspector. Failure to hear these representations would, in our respectful view, substantially prejudice participants and undermine participation in the planning process.

In particular we have noted the aim of the Framework set out at paragraph 47 is to boost the supply of housing whilst the CS seeks to restrain housing growth without exploring how planning policy can facilitate greater growth. The CS fails to meet the full objectively based need for either market or affordable housing, indeed the total proposed annual housing growth figures fail to provide much more than half the annual affordable housing need of the District (which has persistently failed to meet its housing needs).

The Inspector has raised issues of concern and concluded fairly that the Council's housing projections do not provide a robust demographic basis that justifies departing from the housing provision in the South East Plan. The Council do not provide any alternative basis for such a deviation and have not tested higher levels of provision above that they advocate. On this basis, having regard to the pre Hearing meeting and continued invitations to the Council, the only reasonable course of action is to find the plan to be unsound. The only alternative is to re open the Hearing to explore the options open to the Council and debate the options of reducing the time period of the plan, the appropriate length of time for the plan, the phasing of development during the plan period and overall housing numbers. Any alternative course of action would significantly prejudice the interests of the public and development industry as no debate was aired regarding these factors at the Examination in Public.

Introducing a need to review housing provision in 2015 is tantamount to an acknowledgement that the housing strategy of the CS is unsound and that the Council should have investigated comprehensively such matters ahead of producing their CS. The plan should either expire in 2015 or make provision for increased housing beyond 2020 contingent upon infrastructure improvements at North and South Hailsham WWTPs.

This latter approach would provide the certainty craved by the statutory undertakers who sought the proper planning for housing to come ahead of their need to plan and provide for the infrastructure to serve that development. The game of chicken and

egg that has evolved in this case has resulted in the housing needs of the District taking a back seat in this process.

WS2

The amendments leave the text making no sense how would a free for all in terms of the limited proposed housing development in the period 2006 – 2030 with no phasing mechanism “better provide for the timely delivery of infrastructure”.

The Policy would remain with low ambitions and no incentive to provide more than the 400 dwellings per annum set out in the policy.

The policy remains unsound for all the reasons previously considered and those new considerations set out above.

WS3

Further amendments required as there is no brownfield target and PPG3 has been revoked.

WS4

It remains the view of Mark Stephen Limited that a strategic allocation at South Hailsham should be preferred to either of the provision at Stone Cross (SD6 or SD7) and as such the text should be amended to read either:

SD6: Land at South Hailsham - provision of around 220 dwellings

SD7: Land at North Stone Cross - provision of around 430 dwellings

or

SD6: Land at East and South East of Stone Cross - provision of around 220 dwellings with flexibility between SD6 and SD7

SD7: Land at North Stone Cross - provision of around 230 dwellings with flexibility between SD6 and SD7

SD13: Land at South Hailsham - provision of around 200 dwellings

Either scenario would remain within the capacity levels of the local waste water treatment plant and if more capacity was to be indentified then housing numbers could be increased at some or all of the sites.

As matters stand the allocations fail to reflect Government policy of providing housing in the most sustainable locations given the dearth of facilities provided in the dormitory settlement of Stone Cross. It is also clear that Stone Cross is being promoted to meet the needs of housing from Eastbourne and not the needs of Wealden, the allocation at South Hailsham would help to address such matters and make the plan sound.

WS5

The amendments leave a free for all in terms of the limited proposed housing development in the period 2006 – 2030 with no phasing mechanism and other than being able to condition permissions to ensure they do not come ahead of infrastructure improvements it is unclear how this change would "*better provide for the timely delivery of infrastructure*".

Figure 5 indicates that no housing from any strategic site would come forward until 2016 at the very earliest. Given the plan runs from 2006 to 2026 (as proposed by the Inspector) that means no strategic housing allocation would be delivered until the second half of the plan period. Housing from a South Hailsham allocation can come forward in the short term delivering housing in the year 2014/15

The policy and its supporting text remains unsound and ill conceived for all the reasons previously considered and those new considerations set out above.

WS8

The note in respect of the South Hailsham WWTP makes no sense as the numbers proposed relate to the level of alleged headroom within the existing facility and are therefore already constrained. No part of the table or policy relates to an increase in capacity at the strategic sites or the provision of alternative sites.

Figure 5, Policy WCS4 and supporting text should be amended to make provision for additional strategic locations for housing subject to increased capacity being provided at the WWTP. In particular it should be amended to read (albeit in the first instance we say South Hailsham should be uninhibited and Stone Cross should come forward as a provisional allocation):

> *Subject to increased capacity being provided at the South Hailsham WWTP the following strategic allocation should come forward in the period 2016 – 2026:*
>
> *SD13: Land at South Hailsham - provision of around 200 dwellings*

Such an approach would give greater certainty during the plan period and provide greater flexibility within the plan to increase housing to meet the housing needs of the District.

WS10

There is no mechanism to control release of land save the availability of infrastructure as such this policy is effectively redundant as planning permission would not be granted if infrastructure was not available or could be conditioned to ensure infrastructure was first made available (via a *Grampian* condition).

WS28

The CS provides no incentive for infrastructure providers or the Council to work to make greater capacity at the WWTPs as the plan until 2030 will not lead to deficiencies in waste water treatment plant capacity.

As matters stand the plan will provide for deficient housing numbers to 2030 or 2026 and it is only at that point having under delivered for over 30 years that the issue of infrastructure capacity will be visited and there is no certainty (especially from this plan) that capacity will be available beyond 2030 or 2026 to provide any housing in excess of the provision allowed for in this plan.

The plan is unsound and fails to meet housing need or provide any mechanism to increase housing provision to meet need during its lifetime. It also leaves great uncertainty about provision beyond the life of the plan with the likely outcome infrastructure providers being in the same position as now in 2026 and 2030 striving for certainty in order to make plans and invest.

WS29

Without identifying clearly the level of need for new housing the provision of 7.6 are toothless and mean nothing as the Council's default position is that they are meeting their housing needs.

WS36

Does not read properly needs amending further.

WS38

This means nothing and could result in no change to capacity. The text needs to be amended to state that the aim is to provide greater capacity for new housing and employment space during the plan period and before 2020 to make provision for an additional 2000 homes during the plan period within the South Coastal area. Only then will this plan bring forward any degree of certainty rather than vague platitudes and possible talks about talks.

WS43

Add Urban extension south of Hailsham at Oaklands (SD13) (residential/ doctors' surgery)

WS44

Delete SD6 or amend SD7 as per suggested changes at WS4.

MM3

The modification of the plan period to 2027 would reduce the time over which the plan relates by three years so a plan that runs from 2006 to 2027 would run for 21 years. However given the previous advice in PPS12 it is difficult to understand why any period beyond 15 years is being considered in this case (2006 – 2021). Indeed a much shorter period would seem to be justified given the fact that a review is proposed in 2015 (2006 – 2015).

The proposed amendment would not overcome the unsoundness of this plan.

MM4

The proposed modification would do little other than reduce the plan period by three years to meet the excessive need for housing in the District and in particular within the South Coastal Sub area.

During the plan an increase in population of 19000 – 20000 is predicted with an increase of 16800 household predicted. The Council's response is to provide just 57% of this urgent need (9600). A reduction in the plan period to 2027 could reduce the increase in household formation by 12.5% or 2100 to 14700. However, delivery of 450 houses per annum during a 21 year plan period would provide 9440 households or 64% of the demand for new housing.

The modification whilst an improvement on the Council's approach still fails to make the plan sound as it manifestly fails to provide for the needs of the District in terms of housing over the plan period.

The SEP required the provision of 550 dwellings per annum, this was already a moderated figure allowing for local constraints and as demonstrated a need for 16800 households over the plan period equates to 700 dwellings per annum. The delivery of 450 dwellings per annum would only equate to 13.5 years supply of housing set against the need for 16800 dwellings in the District to 2030.

The most satisfactory way to deal with the matter would be to restrict the life of the plan to 2006 to 2020 (i.e. a period consistent with the amount of housing that can be delivered to keep pace with need and a time when the statutory undertaker will be able to satisfactorily report on how they will be able to increase headroom to account for new housing in the area.

Such a reduction still provides a strategic plan outlook as well as giving statutory undertakers more certainty in terms of their long terms planning, funding and investment programmes in terms of the period beyond 2020.

MM5

Same comments from MM4 to be carried forward

MM7

Same comments from MM4 to be carried forward

MM8

Same comments from MM4 to be carried forward

MM12

Same comments from MM4 to be carried forward

MM14

This approach whilst preferable to the blind approach of the Council still leaves much doubt in the minds of the development industry, statutory undertakers and most importantly the public. Moreover it reduces the effectiveness of a plan that is intended to run until 2027 or 2030 as effectively it becomes worthless after 2015.

The only reasonable and sound response to the issues is either to find the plan unsound given it is not based on a demographic basis and fails to plan for the needs of the District and more particularly the South Coastal Sub Region and is not consistent with the Regional Spatial Strategy.

The review shall include an assessment of current and future levels of need and demand for housing to provide an appropriate basis for longer term housing provision. Surely it is the role of the plan to make provision for housing provision in the medium and long term and the fact that there is a need for a review is indicative of the fact that the plan is unsound.

The introduction of the review clause breaks the period the CS relates to and effectively undermines the effectiveness and clarity of the plan.

MM21

Same comments from MM4 to be carried forward

MM22, 23 and 24

Same comments from MM4 to be carried forward

MM32

Same comments from MM4 to be carried forward