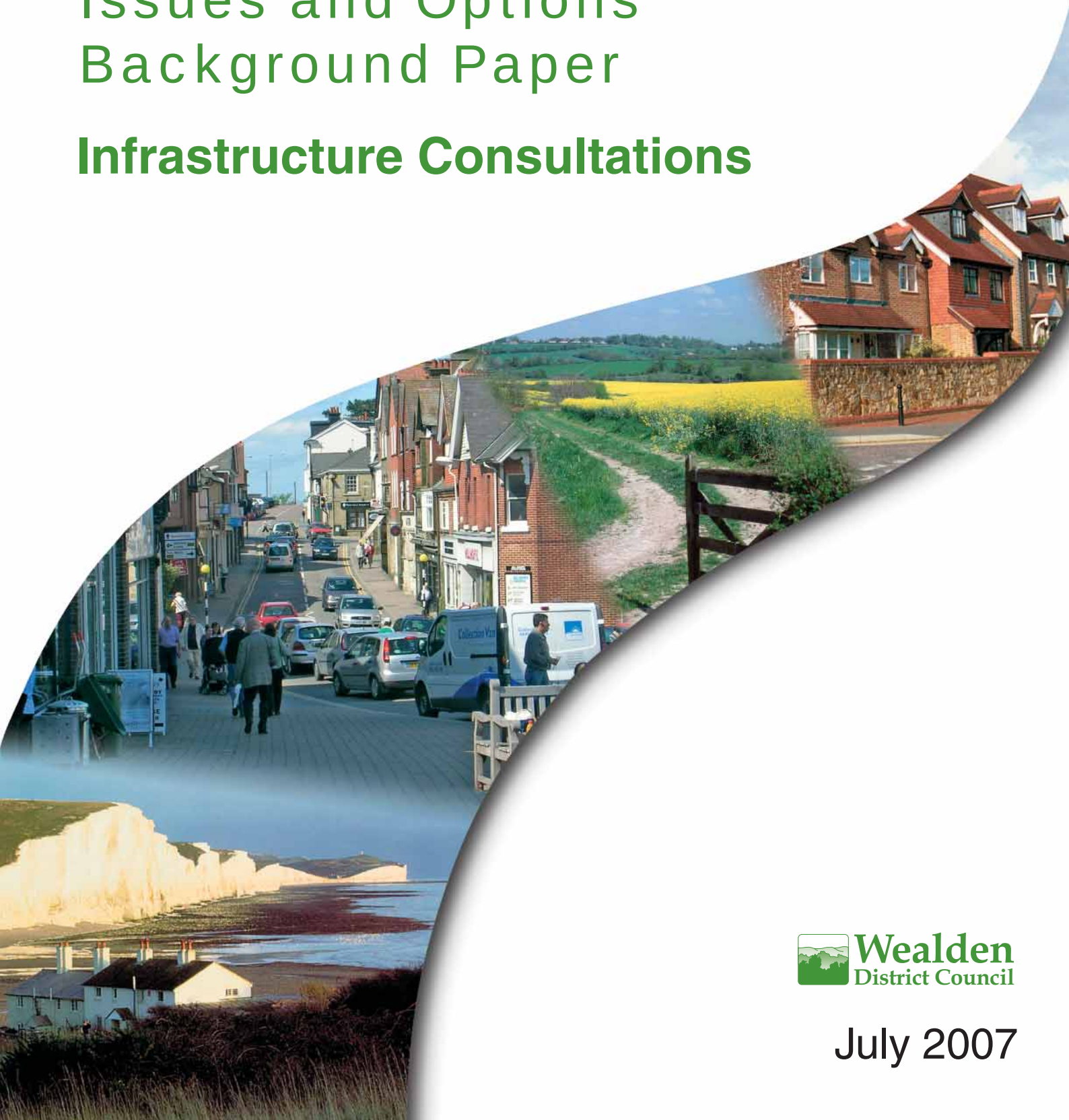


Wealden District Council
Local Development Framework

Core Strategy

Issues and Options Background Paper

Infrastructure Consultations



How to Contact Us

Head of Planning and Environmental Policy

Wealden District Council

Council Offices, Pine Grove, Crowborough, East Sussex TN6 1DH

Telephone 01892 602007

Email ldf@wealden.gov.uk

Website www.wealden.gov.uk

Office hours Monday to Friday 8.30am to 5.30pm

Wealden District Council

Council Offices, Vicarage Lane, Hailsham, East Sussex BN27 2AX

Telephone 01323 443322

Website www.wealden.gov.uk

Office hours Monday to Friday 8.30am to 5.30pm

If you, or somebody you know, would like the information contained in this document in large print, Braille, tape/CD or in another language please contact Wealden District Council on 01323 443322 or info@wealden.gov.uk



Recycled Paper

**WEALDEN LOCAL DEVELOPMENT FRAMEWORK
CORE STRATEGY: ISSUES AND OPTIONS
REPORT ON INFRASTRUCTURE CONSULTATIONS
Early Engagement up until 2007**

July 2007

**Wealden District Council
Directorate of Environmental Services
Council Offices
Pine Grove
Crowborough
East Sussex
TN7 4BT**

**www.wealden.gov.uk
ldf@wealden.gov.uk
01892 602007**

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1.0 INTRODUCTION

- 1.1 This document contains copies of correspondence and minutes of meetings relating to early consultations with infrastructure and service providers prior to publication of Wealden District Council's Core Strategy Issues and Options Paper.
- 1.2 Work on developing the Council's Local Development Framework Core Strategy commenced in earnest at the beginning of 2007. To enable the Council to identify an appropriate and realistic range of options upon which consultation should proceed, key service and infrastructure providers were contacted to ascertain their views. In particular, the consultations sought to identify whether there are any key "show stoppers" which should preclude some options from further analysis or consultation at this early stage in the process.
- 1.3 Inevitably the consultation process is an iterative one. As work develops, the nature and range of options develops also. Some of the options now identified in the Council's July 2007 Issues and Options Consultation Paper therefore differ from those identified in initial consultations with service providers undertaken earlier in 2007. In addition, work on developing a strategy for growth in the villages has taken place in parallel with infrastructure consultations, and it has not yet been possible to seek views on the suitability of these villages for growth in terms of infrastructure capacity. It is however emphasised that one of the key aims of the Issues and Options Consultation Paper is to elicit views from all relevant parties and stakeholders on a full list of options. The Consultation Paper will therefore be issued to all of those service and infrastructure providers to enable an appropriate dialogue to continue. In other cases, where no response has been received, the Council will use its best endeavours to encourage key bodies to respond and input in to the LDF process.
- 1.4 Many of the options identified in the Core Strategy Issues and Options Consultation Paper will not be taken forward. At this stage in the process, the purpose of consultation is to seek views on a "long-list" of possibilities. As the Core Strategy progresses, it will only be necessary to take forward sufficient options necessary to meet the housing and development requirements of the South East Plan, together with any necessary contingencies and other options to meet specific local requirements. Further more detailed analysis and assessment of options will also be required before any decisions can be taken on the Council's "Preferred Options". That work may also rule out some options as being unfeasible or unrealistic in the context of the level of infrastructure likely to be achieved.
- 1.5 To ensure that Wealden's Core Strategy passes the tests of soundness, once it reaches its "Examination" stage, it will be important that the Plan puts forward a realistic strategy for the development of the District. Options should have regard to the capacity of existing

infrastructure to accommodate development or to the prospects of securing new infrastructure necessary to meet the needs generated by new development. This means that the Core Strategy will need to be underpinned by evidence of infrastructure capacity, the impact of new development, the level of additional provision requirement and mechanisms which can be put in place to secure the new infrastructure at the appropriate time. It is important that infrastructure providers align their own strategies and budgets to integrate with the Local Development Framework. This can only be achieved through developing close working relationships and an early dialogue on the possible options. The Council wishes to thank all of those bodies which have responded to early engagement requests and in particular for the support offered by the Wealden Local Strategic Partnership.

- 1.6 The Council welcomes comments on both the Core Strategy Issues and Options Consultation Paper and on any of the points raised within this document. The Council in particular invites comments from the development industry on the infrastructure constraints and opportunities. If you wish to make comments on the Consultation Paper, please do so through the Council's web site www.wealden.gov.uk and follow the links to the Local Development Framework pages. If you wish to make comments on anything you see in this document, please e-mail the Council on ldf@wealden.gov.uk. Please note that the Council must receive all comments no later than 5.30pm, 13th August 2007.

- 1.7 Information on infrastructure consultations is presented as follows:

- Schedule summarising key issues for each of the towns and urban areas;
- Copies of letters issued to key service providers in February 2007;
- The content of letters of response or of minutes of meetings held with infrastructure providers are also reproduced, relating to each of the key bodies. All responses received are documented.

2.0 SUMMARY SCHEDULE OF KEY SERVICE/INFRASTRUCTURE PROVIDERS RESPONSES TO EARLY ENGAGEMENT ON CORE STRATEGY ISSUES AND OPTIONS (Up Until June 2007)

2.1 This Schedule summarises the key findings emerging from the initial consultations with service providers carried out in early 2007. It aims to provide an overview of the main issues.

Town/Urban Area & Infrastructure Topics	Crowborough	Heathfield	Uckfield	Hailsham	Polegate	Edge of Tunbridge Wells Area
Education (ESCC)	Significant spare capacity available in the primary school sector. Some spare capacity also available at Beacon School (100 places, broadly equivalent to demand generated by about 500 dwellings)	Secondary school already operating above capacity. Some extra accommodation is being added. Overall, no capacity to accommodate more than about 50 children (250 homes). No significant capacity concerns for the primary school sector.	Secondary school capacity is the key issue. School already too large for site and lack of space to expand further. One solution may be a separate 6 th form facility but this requires further investigation.	Further assessments necessary. Current capacity in secondary sector likely to be taken up by sites already identified in Non-Statutory Local Plan. A separate post 16 centre is being pursued, which may offer scope for capacity <16.	No spare capacity to accommodate further growth in this area. Options are to expand Causeway and/or Eastbourne Technology College. ESCC to advise on potential need for a wholly new secondary school to serve the catchment.	Children would be eligible to attend Frant and Uplands. Capacity issues at Frant still to be resolved through bringing forward the site identified in the Non Statutory Local Plan. Consultations with Kent County Council also required as in practice children likely to prefer to attend schools in Tunbridge Wells.
Health (PCT)	Existing premises have the capacity to accommodate about a	Insufficient capacity to accommodate significant	Some spare capacity will be available (for up to about 250	Overall, no capacity to accommodate further growth above that	Requirement for additional accommodation	Subject to further consideration.

Town/Urban Area & Infrastructure Topics	Crowborough	Heathfield	Uckfield	Hailsham	Polegate	Edge of Tunbridge Wells Area
	further 1,500-2,000 people (500-650 dwellings).	expansion at Heathfield.	homes) through the new surgery development at Rocks Park. Development on the east and north side of Uckfield would be most difficult to accommodate, compared to options to the south and west. Expansion on the north side of Uckfield could necessitate additional investment at Buxted.	identified in the Non-Statutory Local Plan.	(above that allocated in the Non-Statutory Plan) to be considered once more information on precise locations is available. Capacity constraints at existing surgeries.	
Libraries (ESCC)	Existing library too small for demand but potential for expansion linked to Pine Grove development opportunities.	Capacity to accommodate about 100 additional dwellings, although the existing library is below the ideal standard square meterage for its population.	No significant constraints on future growth.	Capacity for further growth dependent upon delivery of new premises East of Battle Road. No ESCC funds available for this – developer contributions only.	Need for additional facilities/premises will depend upon the location of new development. The existing location may need to be reviewed.	Consultations with Kent County Council will be necessary. Facilities at Wadhurst are limited, although lottery funding being sought for a new building project.
Transport – Highways Agency	No significant trunk road issues.	No significant trunk road issues.	No significant trunk road issues.	Development at Hailsham will necessitate implementation of the	Development at Polegate will necessitate implementation of the	No response received, but scale of development

Town/Urban Area & Infrastructure Topics	Crowborough	Heathfield	Uckfield	Hailsham	Polegate	Edge of Tunbridge Wells Area
				A27 West of Polegate Trunk Road Junction Improvements. Developments at Hailsham will have a lesser impact on the trunk road than development at Polegate. Developer funding will be required to bring forward a scheme before 2011.	A27 West of Polegate Trunk Road Junction Improvement. Development at Polegate will have a greater impact on the trunk road than development at Hailsham. Developer funding will be required to bring forward a scheme before 2011. The HA would not support any new direct access points from the A27 to serve new developments.	unlikely to have a material impact on operation of A21.
Transport – ESCC	Options to the south of Crowborough are problematic given constraints at Western Road and poor connections with the town centre. Options to the north are preferable and are well positioned in relation to bus routes, although impacts on	Poor public transport connections to surrounding villages and rail stations. ESCC believe only a larger scale of development could fund necessary public transport improvements (eg improved bus services). South	Town centre safety and capacity key constraint on growth. Options being developed to accommodate traffic generated by developments in the Non-Statutory Plan but no clear conclusion about potential to accommodate growth	Capacity and safety record of A271 a major constraint on development to north and east of Hailsham. Both of these areas would be likely to necessitate some form of A271 relief road, although the proximity of options to the east of Hailsham to the town centre	ESCC consider grade separation of Cophall to be critical to releasing capacity on A2270 and therefore the potential for Polegate to accommodate growth.	Concerns about poor quality of connections to A26/A267 and any increase in traffic using unsuitable rural routes. Bus service connections to Tunbridge Wells also poor.

Town/Urban Area & Infrastructure Topics	Crowborough	Heathfield	Uckfield	Hailsham	Polegate	Edge of Tunbridge Wells Area
	the B2100/A26 Crowborough Cross Junction would need to be assessed.	Heathfield is most problematic in terms of links to town centre.	beyond this. Funding for the scheme is however problematic. ESCC would not support new junctions to A22 which limits options on west side of Uckfield. Overall, options to east side of Uckfield likely to be most problematic. A22 also approaching capacity so improved bus connections would be necessary, more likely to be achieved through larger focused developments than smaller dispersed developments around the town.	would have sustainable travel benefits. Options to the south of Hailsham have poor connectivity to town centre and could also require new link road infrastructure.		Further consultations with Kent County Council required.
Drainage (Southern Water)	Southern Water advise that there are no significant capacity constraints at the 2 treatment works serving the town. Some additional treatment plant may be	Southern Water advise that there is significant additional spare capacity in the catchment.	The Environment Agency has advised that there are no water quality issues at the Uckfield STW. Southern Water has indicated that there is some headroom to	Capacity constraints at Hailsham North and South STW, which will necessitate a new treatment works to accommodate any development.	Polegate is served by Hailsham South STW. Given capacity constraints at that location, any development will necessitate a new treatment works to be	Southern Water advised of possible "environmental" issues and constraints on handling additional

Town/Urban Area & Infrastructure Topics	Crowborough	Heathfield	Uckfield	Hailsham	Polegate	Edge of Tunbridge Wells Area
	necessary but there is discharge consent headroom to accommodate this. Some local sewer improvements would be required. The EA has not raised any concerns on “environmental aspects” of drainage.		accommodate growth within existing consents, although some upgrading could be necessary to cope with additional volumes. Southern Water also expressed concerns about development within 400m of Uckfield STW. Odour modelling work is being undertaken to determine the precise limits.	Southern Water also expressed concern about any development within 400m of Hailsham South STW – odour safeguarding.	provided. The EA advise that Development east of Stone Cross would drain into Eastbourne STW. Whilst there are no water quality issues there, Southern Water has indicated a capacity constraint .	discharges in this area.
Flooding (EA)	The EA wishes to “reserve judgement” on options pending completion of strategic flood risk assessments.	As per comments for Crowborough.	The extent of floodplain is likely to restrict potential development options.	The extent of flood plain is likely to restrict development options.	The extent of floodplain is likely to restrict development options.	
Water Supply (SE Water)	SE Water is unable to offer comments on specific spatial options ahead of the production of its Draft Water Resources Plan	See entry for Crowborough. All options close to minor aquifer with a shallow water table	See entry for Crowborough. Options on south, east and west side of Uckfield are close to	See entry for Crowborough.	See entry for Crowborough.	See entry for Crowborough.

Town/Urban Area & Infrastructure Topics	Crowborough	Heathfield	Uckfield	Hailsham	Polegate	Edge of Tunbridge Wells Area
	(Scheduled for consultation in April 2008). The current Water Resource Plan identifies a deficit by 2015/16. If confirmed in the next plan there will be a need for demand management measures and new resources such as A new reservoir at Clay Hill. The lead in time for such facilities is significant. Further consultation with SE Water required to assess implications of any decision not to proceed with the Newhaven desalination, which may reduce headroom earlier.	sensitive to development (EA).	aquifers, so potential pollution concerns.(EA) There are some Source Protection Zones in the vicinity of options, with moderate/low sensitivity.			
Waste	No response from Waste Planning Authority.	As per comments on Crowborough.	As per comments on Crowborough.	As per comments on Crowborough.	As per comments on Crowborough.	Further consultations with Kent County Council required.
Other	The LSP expressed concerns about the lack of services in the	Concerns expressed regarding public transport	The LSP suggests that development could be promoted as	The EA highlighted the potential ecological impacts of	The LSP has expressed a preference for	No specific views obtained.

Town/Urban Area & Infrastructure Topics	Crowborough	Heathfield	Uckfield	Hailsham	Polegate	Edge of Tunbridge Wells Area
	voluntary sector around Crowborough.	accessibility.	a means of helping to deliver the reinstatement of the Lewes-Uckfield line. The EA has expressed concerns about development on the NW area of Uckfield due to ecological impacts.	any Greenfield development. Hailsham was however considered to be a particular concern due to potential impacts on the Pevensey Levels.	development at Polegate over Hailsham due to its rail access and proximity to Eastbourne. The LSP also expressed strong concerns about developing in the gap between Hailsham and Polegate.	

3.0 INITIAL INFRASTRUCTURE CONSULTATION LETTERS: DATED 19 FEBRUARY 2007

3.1 The following letter was issued to:

British Gas
EDF Energy
Environment Agency
East Sussex County Council (separately to Planning, Transport,
Education, Libraries and Minerals and Waste)
East Sussex Downs and Weald NHS Primary Care Trust
East Sussex Hospitals NHS Trust
Highways Agency
Government Office for the South East
Maidstone & Tunbridge Wells NHS Trust
National Grid
South East Coast Strategic Health Authority
South East Water
Southern Gas Networks
Southern Water
Sussex Ambulance NHS Trust
Transco
Transco South East

my
reference

LDF0410/JW

Head of Planning & Environmental Policy
David L Phillips

ask for

Jacqueline Watson

date

19 February 2007

(letter A)

Council Offices, Pine Grove
Crowborough, East Sussex TN6 1DH
T: 01892 653311
F: 01892 602777
Minicom: 01323 443331
E: planning@wealden.gov.uk
W: www.wealden.gov.uk

your

CONFIDENTIAL

Dear

WEALDEN DISTRICT COUNCIL'S LOCAL DEVELOPMENT FRAMEWORK CORE STRATEGY: EARLY ENGAGEMENT

Wealden District Council has commenced work on the preparation of its Local Development Framework. Last month, the Government Office for the South East agreed a revised Local Development Scheme setting out the timetable for the production of the various documents which will collectively comprise our Local development Framework. This year, our priority is

to progress work on a Core Strategy for the District, which will provide a strategic overarching vision for the period up to 2026, in line with the emerging South East Plan. Our programme is to undertake a full public consultation on an Issues and Options paper in June 2007, before developing a Preferred Options Document for formal consultation in early 2008. The purpose of the Issues Paper is primarily to seek views on priorities and the main cross-cutting issues for the Core Strategy to tackle, and to identify an initial "long-list" of the possible locations for accommodating growth with information on their pros and cons.

In accordance with the Town and Country Planning (Local Development) (England) Regulations 2004 we are now seeking the views of various bodies to help inform the production of our Core strategy Issues Paper. Initially, we are contacting all major infrastructure and service providers to gain an understanding of how each relevant body is responding to the challenges of the South East Plan and to commence a dialogue on the constraints and opportunities within Wealden to help identify appropriate options for growth.

Whilst Local Development Frameworks must focus on setting out how Council's will accommodate future housing and economic growth in line with their relevant Regional Spatial Strategy, they also provide an important vehicle for helping to deliver the spatial requirements of key service providers, through identifying land for buildings and facilities or through setting out policies for developer contributions towards the cost of providing necessary and associated new infrastructure. We believe that our collective aims are likely to be more deliverable by aligning our respective plans, strategies and investment programmes. We are therefore writing to you to request information about your current forward planning programmes, to ascertain what evidence we can share, to explore how best we can work together and to seek your views on some initial geographic options for locating future development.

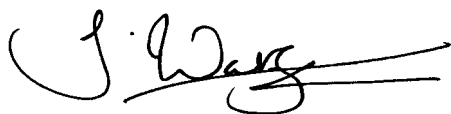
I attach a sheet of questions, together with two plans identifying indicative areas for investigation for accommodating future development around our towns. We would welcome the opportunity to meet with you or your representative to discuss the points raised. Alternatively should you wish to send a written response at this stage or send relevant material which we should be taking into account, please write to me at the above address. The questions on the attached sheet are not intended to be comprehensive, but simply to guide our future discussions, equally you may wish to raise other points and issues.

We would be most grateful for some initial feedback over the course of the next few weeks on opportunities and constraints and the spatial options for development. Whilst we recognise that there is likely to be a need for continuing liaison it would be helpful for us to be aware, as early as possible, of any potential "show stoppers" which may preclude us from investigating any particular options in more detail. We would stress that at this stage no detailed work has been undertaken on the suitability of the specific the areas identified on the plans, they simply reflect possible areas where town expansions could take place. There will no doubt be other options, indeed we note that recent planning guidance on housing includes new settlements within the list of possibilities for planning authorities to consider. Whilst there is no provision for a new settlement within the South East Plan, we are seeking views on whether such a possibility should be considered, at least at the early Issues stage. In view of this, we would also appreciate your views on the appropriateness of a new settlement option in areas outside of protected landscapes, perhaps linked to the A22 corridor in the South of Wealden, or as a means to promote reinstatement of the Lewes-Uckfield line in the centre of our District. Equally, at this stage, we have yet to assess and determine the criteria which should be employed for identifying which villages may be suitable locations for taking some new development, and we will write to you separately on this aspect in due course. In the meantime, we would welcome any thoughts which you may have in developing the criteria.

We look forward to working with you in meeting the significant challenges set by the South East Plan. Please do not hesitate to contact me should you wish to discuss any aspect of this letter or the information and questions attached. If you would prefer to meet to discuss your views on the content of this letter, please contact me on 01892 602499.

We look forward to hearing from you soon.

Yours faithfully



Jacqueline Watson
Planning Policy Manager

cc. David Paine, Government Office for the South East (and for Strategic Health Authority)

Encs.

A: Questionnaire

B: Plans showing possible areas for growth around Wealden Towns;

C: Schedule of Indicative Housing Numbers for Each Potential Growth Area

GENERAL QUESTIONS APPLICABLE TO ALL SERVICE/INFRASTRUCTURE PROVIDERS

Assisting Our Understanding of Your Remit, Current Plans and Future Investment Strategies

1. Please confirm your statutory duty in providing your relevant service and a brief description of how this happens;
2. Do you/can you require developer contributions towards the cost of providing your service/infrastructure?
3. What forward planning do you undertake in assessing the future demands for your service? What timescale are you looking ahead to?
4. How are you responding to the changes likely as a result of the policies of the South East Plan? What is the key driver in your own forward planning process?
5. What relevant plans, policies, strategies in relation to the provision of your service should we have regard to in producing our LDF?

Sharing/creating an Evidence Base to Justify Policies and Spatial Development Options in our LDF

6. What are the key issues for your service, to be addressed in Wealden's LDF and what evidence do you have to support this view?
7. In terms of your service, are there particular issues and challenges which are distinctive to Wealden which warrant a special response?
8. Have you undertaken any recent consultation or research, the results of which need to be addressed in our LDF?
9. Can you provide catchment plans relevant to your service as they apply to Wealden. Eg GP catchments, drainage catchments, school catchments?

Helping Us to Support Your Requirements through our LDF

10. In which areas of Wealden do you consider there to be a need for new and improved facilities (for your service) irrespective of future development issues? For example,

deficiencies with existing premises, or expansion requirements to address existing shortfalls;

11. In what way or current shortfalls being addressed? Is there a role for the LDF in seeking to assist implementation? Eg. Identification of a site. How is it being funded?
12. Have you identified particular deficiencies in your service area in meeting anticipated future needs and what action is being taken to address these?

Our Communications with You and Your Involvement in our LDF

13. Please confirm your preferred point of contact for future correspondence/communication;
14. Would you value meeting with a member of our LDF team to clarify any of the points raised in this letter?
15. Would you be willing to participate in other discussions/events, possibly with local parish council representatives;
16. In what way have you involved your customers/users/local community in shaping your own policy and practices in service delivery?

INITIAL CONSULTATION ON POSSIBLE DEVELOPMENT LOCATIONS AROUND TOWNS

The South East Plan requires Wealden District Council to make provision for building 8,000 new homes over the period 2006-2026 (400 per annum). Of which some 4,600 are to be located in the southern part of the District (from Hellingly/Hailsham in the north to the boundaries with Eastbourne in the south), and some 3,400 are to be located in the rest of the District north of Hailsham/Hellingly. Given commitments already identified in the Non-Statutory Local Plan, it is envisaged that provision now needs to be made for a further 5,000 dwellings for the period 2011-2026. Of this 5,000, about 60% (3,000) will need to be in the southern part of the District, and 40% (2,000) in the rest of Wealden, although it is anticipated that there could be some limited flexibility in this distribution, provided that the overall total is achieved.

The South East Plan also makes it clear that most of the future development should be in the form of extensions to the main urban areas, although we will need to test this assumption. In addition to housing growth, the South East Plan also emphasises the need for economic development and balancing employment growth with housing growth. Whilst no targets on land areas or net additional floorspace have been set, the expectation is that significant amounts of land will also need to be allocated for employment purposes, to ensure that housing growth is matched by employment opportunities.

To help inform the identification and refinement of options to put forward for consultation in our forthcoming Issues Paper, we are seeking your views on a number of general principles, as set out below. We are also seeking your views on the opportunities and constraints associated with specific geographic sectors of each of our main towns (identified on the attached plans), to inform the process of whether any of these locations should be ruled out from further consideration. Please note that we have only put forward indicative housing numbers for each geographic area to act as a guide on the maximum scale of development which could be contemplated in a particular sector. Inevitably, some sectors may be more suitable for business growth rather than housing growth, and those choices will be made as work progresses. It is also important to note that only some of the sectors will ultimately be selected to go forward in our Core Strategy. What combination of sectors and locations will be determined having regard to issues such as infrastructure constraints and deliverability, will need to be developed at the next stage, following this process of early engagement.

All of the questions set out below, should be considered in the context of the delivery of your particular service.

17. From your own service perspective, is focusing most of the development around existing urban areas, the most appropriate solution for meeting the requirements of the South East Plan?
18. What proportion of the total housing requirement should be accommodated in the villages as opposed to through urban extensions? We will need to look at a range of scenarios ranging from 10% to 25% - what would be the implications in terms of the delivery of your service?
19. What issues would be raised if a more dispersed pattern of development were to be pursued (in excess of 25%) with a greater share of development being allocated to villages around the District?
20. Do you favour the majority of development being split equally (as far as practicable) between the different urban areas or focused on one or two key areas?
21. Do any of the towns have particular constraints which may preclude consideration being given to significant growth, irrespective of the specific part of the town? Can these constraints be overcome in any way and within what timescales?
22. Are there specific capacity limits which may constrain development to particular thresholds in any of the towns?
23. In terms of the areas identified on the enclosed plans, are there particular constraints associated with the principle of development taking place in these areas, either for housing or business?
24. In terms of selecting which villages should accommodate some housing growth (ie. Up to 25% of the total), do you favour allocating smaller scale development to a greater number of villages, or focusing on fewer villages (but with potentially larger scale allocations)?
25. Are there particular villages which have significant constraints on expansion, even on a limited scale? And conversely, are there particular villages which have capacity at present?
26. The expectation is that development will need to be phased over the lifetime of the Plan ie. To 2026. How will this phasing impact on service delivery and the timing of any new infrastructure required?
27. If there are particular constraints, from your own service perspective, should development be phased to focus on specific towns initially, and if so which?
28. What other spatial options have we missed?
29. Do you believe that from your own service perspective consideration should be given to a new settlement or new settlement options? If so, why and where should it/they be and what size would be necessary to secure the necessary infrastructure?

SERVICE SPECIFIC QUESTIONS

We have set out below some questions specific to particular service providers. These are intended to act as a guide in our future consultations and are not intended to be fully comprehensive. They act as a starting point, and we would intend to refine and continue our dialogue as work on looking at specific options progresses. At this stage, we are looking for a more strategic approach to pros and cons of how development is accommodated.

Education

1. Wealden District Council's Non-statutory Local Plan makes reference to the potential need for a new secondary school to serve the Eastbourne/South Wealden area in the period post 2011. What consideration is being given to how this need should best be addressed/delivered?
2. What forecasts are being made for school rolls generally and over what timescale? Do they show a declining roll, in the without development scenario, and to what extent will this in the longer term release capacity? We understand that Uckfield Community College now has the capacity to accommodate pupils arising from the development of an additional 300 homes over and above the Non-Statutory Plan allocations. IS this likely to be typical elsewhere?
3. What are the most up to date pupil product ratios which should be used in assessing the likely need for places generated by new development?
4. If most of the secondary schools within each of Wealden's main towns are operating at or close to capacity, which of those schools, if any is capable of expansion to meet the needs of future population growth?
5. If expansion cannot be achieved on existing sites (possibly due to insufficient space) how should additional secondary school places be secured? Will there be limits on particular towns on how much further development (over and above that already identified) can take place? Will this necessitate focusing development on fewer urban areas, to achieve sufficient critical mass to secure a new school? Can post 16 education be entirely split as a means of releasing capacity on existing sites?
6. If a new secondary school is considered necessary for future growth, what will be the criteria on its size and phasing of bringing into operation, having regard to the likely need to phase development over the lifetime of the plan period?
7. In the case of primary schools, which schools are expected to remain close to capacity and have no potential for further expansion to meet future needs?
8. What consideration is being given to integrating service delivery with other agencies, eg. Allowing multi-purpose use of school facilities, eg hall and recreation space?

Transport (general)

1. Where are the main constraints/stress points on the highway network in the District? How will these affect the choice of locations for future growth or the scale of growth around particular towns? How can these constraints be overcome? What measures will be necessary?
2. What are the particular significant transport constraints associated with each of the geographical sectors around the towns, as identified on the accompanying plans? Again, what significant measures would be necessary to address those constraints, in terms of highway improvements, access arrangements, improvements to public transport?
3. What specific transport (including accessibility by public transport) criteria should be taken into account in identifying villages which may be appropriate for some future development? Do you have a view on which settlements offer capacity for growth?
4. What is the most appropriate way for taking forward matters in relation to Parking Standards – what role will the LTPs play in determining these?

Public Transport Services

1. Where are there particular capacity constraints with public transport operations? How can these best be overcome?
2. Which locations can be best served by public transport or which have the potential for significant improvements to public transport?
3. From a public transport perspective, is development better focused in fewer locations?
4. Are there villages where further development could help improve the viability of existing public transport services/routes?
5. What consideration is being given by train operators as to how use of train services can be maximised/increased passenger demand accommodated? Eg. Additional services, increased station parking?
6. Are you aware of studies being carried out regarding formation of new routes or the feasibility of a new station?

Health Care

1. Are there particular constraints associated with specific towns in their ability to accommodate future development in line with the South East Plan?
2. Are there particular practices which have the ability to accommodate additional development, either without improvement or with limited expansion?
3. Conversely are there particular practices, particularly in the rural areas, where there is no capacity or patient lists have been closed, which could preclude certain villages from taking any further development unless it was of a scale to help facilitate a new practice?
4. What are the current assumptions for assessing the need for additional GPs and health care facilities, associated with new development?
5. Is there a threshold below which new development is not considered to present a material increase and can therefore be accommodated within existing practices? (ie. Can villages accommodate small scale growth, without significant impact on service delivery, and if so what do you consider to be small, in terms of the number of dwellings?)
6. What is your preference about how new facilities are provided, in terms of focused (one-stop shop approach) or more dispersed smaller premises?
7. what consideration is being given to delivering services jointly or in combination with other services, eg through village halls, community centres etc?

Water Supply

1. Would it be possible to supply a copy of the most recent 5 year Water Resources Plan and most recent annual review, together with information on how the District receives its supply at present?
2. What preparatory work is being undertaken on the next review?
3. Which areas of the District have particular constraints in terms of water supply/pressure, having regard to the overall predicted deficit for the period to 2015/2016?

4. Of the 5MI/d bulk supply likely to be achieved by completion of the Bewl-Darwell and Hazards Green works, how much will be taken by developments already committed in Local Plans, including the Wealden Non-Statutory Plan or meeting current supply/pressure issues?
5. What are the constraints associated with each of the main urban areas and the options identified for initial investigation? How can these be overcome and will it influence the scale and timing of development in particular areas?
6. We understand that consideration is being given to increasing capacity through a proposed desalination plant at Newhaven and a proposed reservoir at Clay Hill. How will these schemes impact on the timing of development taking place in particular localities? What are the options if they do not proceed?
7. What other schemes are envisaged for the future and how will they impact on implementing the South East Plan, including necessary new pipelines and Pumping Stations?

Drainage

1. What is the programme for the completion of the Wealden growth study and can you offer a view on the likely impact on the options and growth potential of Polegate and Hailsham? We understand the constraints associated with the capacity of the Hailsham treatment works (north and south) particularly in terms of the issue of drainage to the Pevensey Levels, and naturally are keen to understand the latest situation.
2. What other work, if any, is being undertaken in advance of the 2009 Periodic Review which is relevant for Wealden?
3. Wealden's Local Development Scheme does not envisage adoption of our Core Strategy until 2010, how will this impact on the timing of the 2009 Review and the ability to secure funds to invest in improvements for the future, beyond our current plan period of 2011?
4. We also understand that there are constraints associated with the size of the outfall for surface water drainage, in the Eastbourne area. Again, how is this issue being addressed and how will it impact on the options and timing for growth in the southern part of the District?
5. Are there particular capacity constraints associated with Drainage which would preclude particular urban options or particular villages within the District?

Power and Utilities

1. Are there particular capacity problems and constraints which may limit growth potential in specific parts of the District or any of the sectors around the towns identified on the attached plans?
2. Which parts of the District are not currently supplied in terms of your particular service? Could some additional development make new connections viable – for particular villages?
3. Are there clear preferences in terms of which locations can be best served?

Waste

1. A number of facilities appear to be operating close to capacity already, on what basis is the need for additional facilities associated with growth now calculated?

2. Are there particular constraints associated with geographic locations associated with handling the consequences of waste generation?
-

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**SCHEDULE OF INDICATIVE NUMBERS OF DWELLINGS
URBAN EXTENSIONS – INITIAL POSSIBLE OPTIONS**

Plan Reference	Urban Area	Sector	Indicative & Approximate No. of Dwellings to Assess
1	Edge of Tunbridge Wells	(South)	100
2	Crowborough	North	150
3	Crowborough	South West	100
4	Crowborough	South	600
5	Uckfield	North-West	500
6	Uckfield	West of A22	800
7	Uckfield	South West	500
8	Uckfield	South	100
9	Uckfield	East	500
10	Heathfield	West	80
11	Heathfield	East	60
12	Heathfield	South	100
	Frant Station/Bells Yew Green	N/A	Up to 25
1	Hailsham	West of A22	700
2	Hailsham	North	500
3	Hailsham	East	450
4	Hailsham	South	500
5	Polegate	North	1,500
6	Polegate	Adjacent to By-Pass	300
7	Polegate	South West	50
8	Polegate	South East	800
9	Stone Cross	East of	300
10	Edge of Eastbourne	Adjacent to Sovereign Harbour	500
	Berwick Station	N/A	Up to 25

DO NOT SUM: Total exceeds SE Plan Requirement, as not all options will be progressed.
Numbers approximate as a guide only.
Table Excludes Village Development Options.

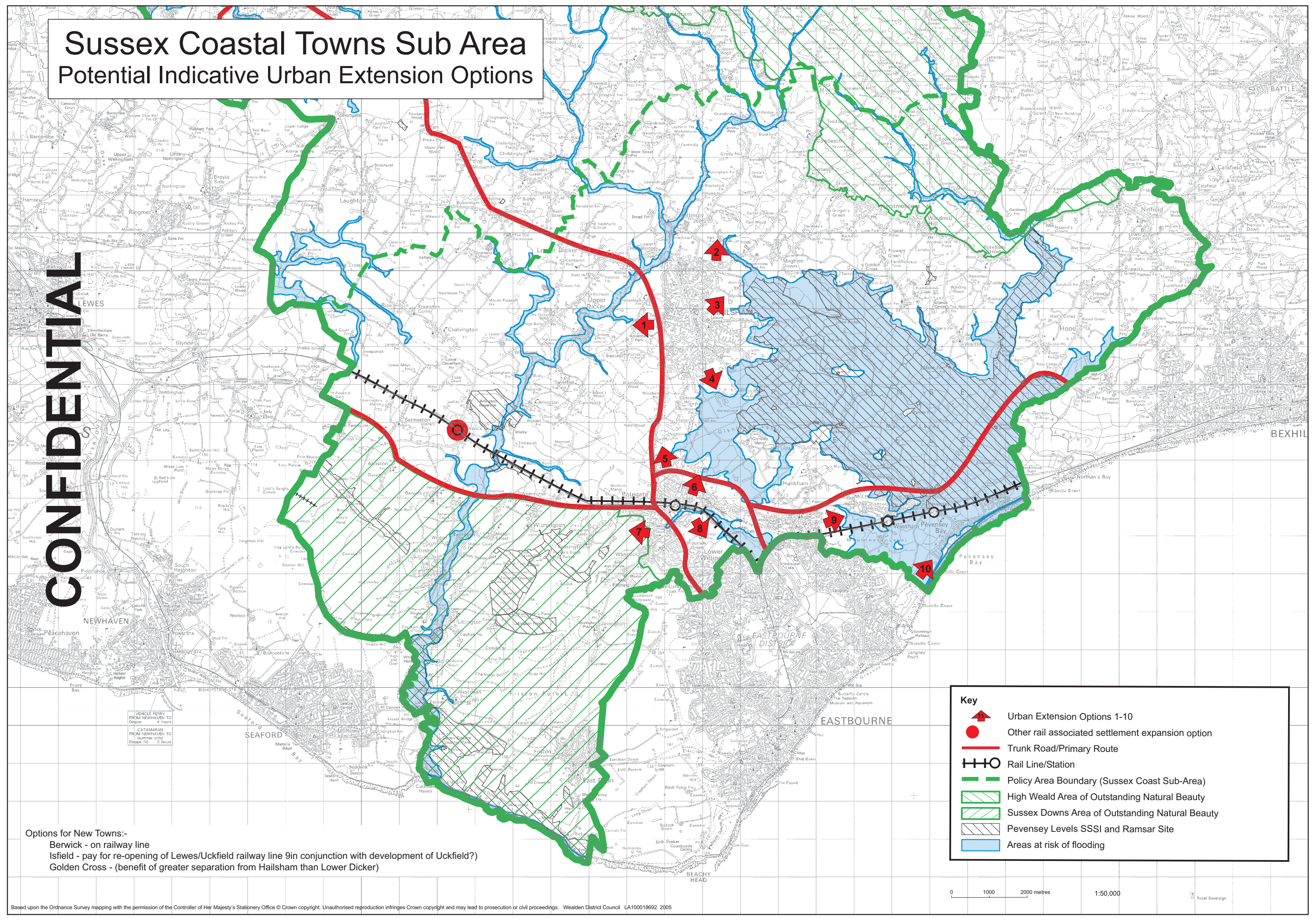
Notes:

The development area options and the approximate number of dwellings set out above are indicative only and have been produced for the purposes of early engagement with service providers, to ascertain constraints associated with developing in particular locations at particular scales. They have no other status and no inference should be taken that they have been calculated following detailed planning appraisals or have been supported by Wealden District Council for inclusion in the Core Strategy. This work is to be undertaken as part of the Core Strategy development. Some options will be discounted and the carrying capacity (in terms of the number of dwellings) will be refined in the light of that work. Some localities may prove more suitable for business growth rather than housing development, this will be assessed as work progresses. The housing numbers are approximate only. No precise boundaries have been identified at this stage.

Sussex Coastal Towns Sub Area

Potential Indicative Urban Extension Options

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Options for New Towns:-
 Berwick - on railway line
 Isfield - pay for re-opening of Lewes/Uckfield railway line 9in conjunction with development of Uckfield?)
 Golden Cross - (benefit of greater separation from Hailsham than Lower Dicker)

Key

Urban Extension Options 1-10

Other rail associated settlement expansion option

Trunk Road/Primary Route

Rail Line/Station

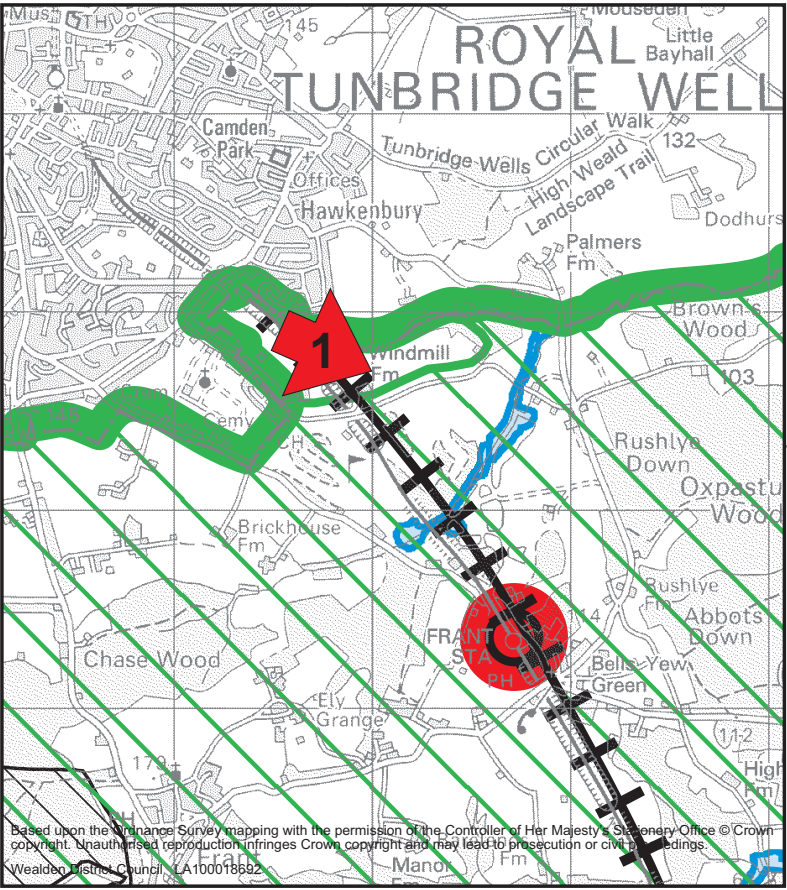
Policy Area Boundary (Sussex Coast Sub-Area)

High Weald Area of Outstanding Natural Beauty

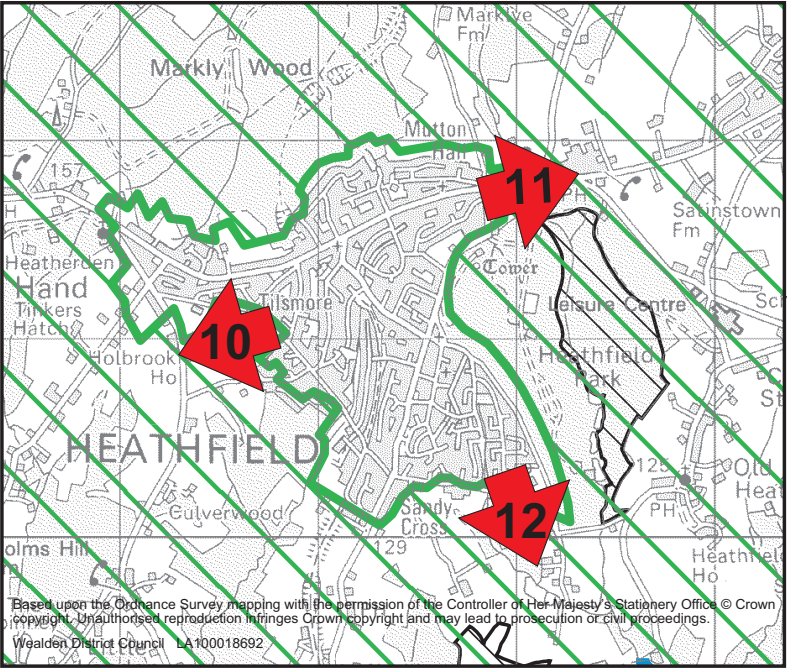
Sussex Downs Area of Outstanding Natural Beauty

Pevensey Levels SSSI and Ramsar Site

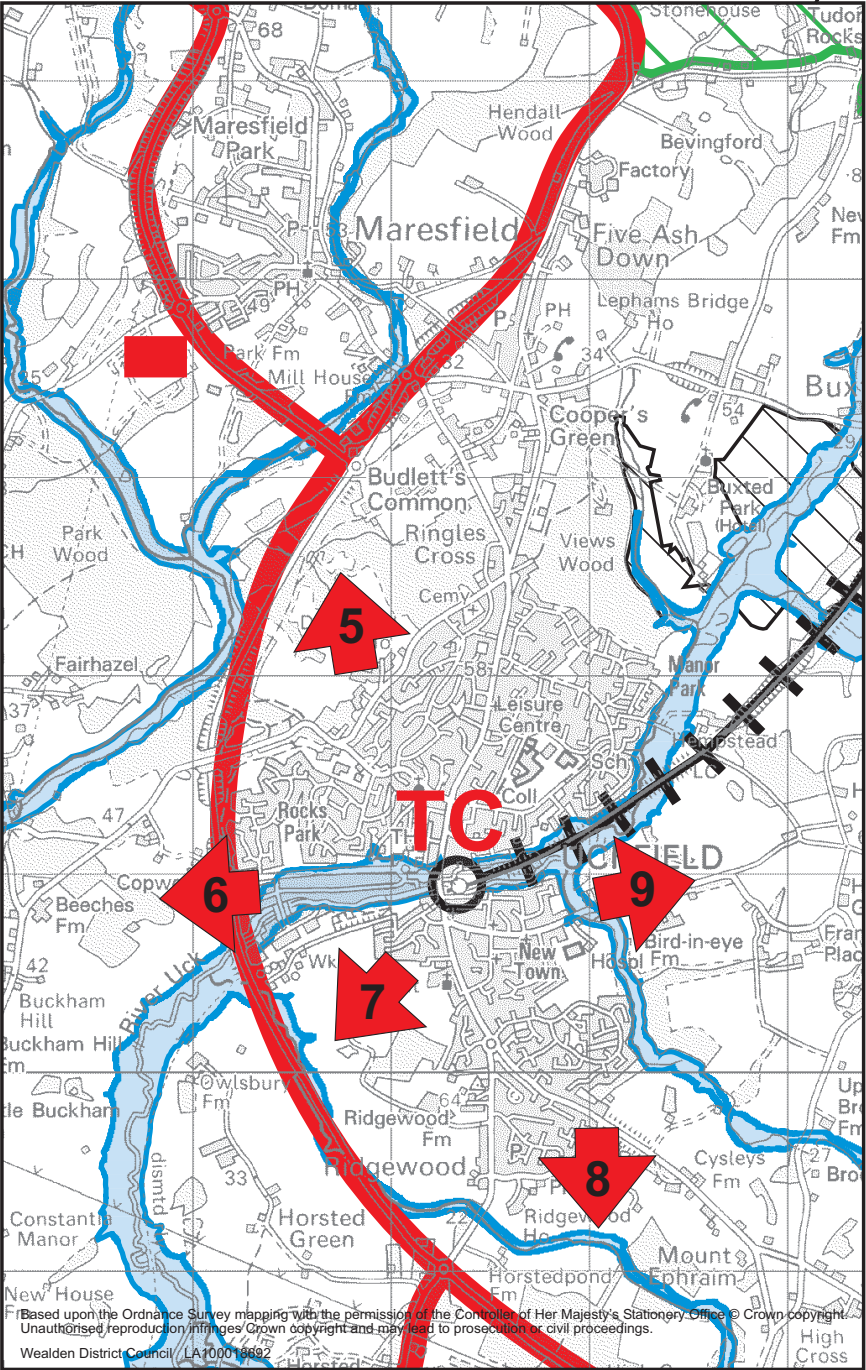
Areas at risk of flooding



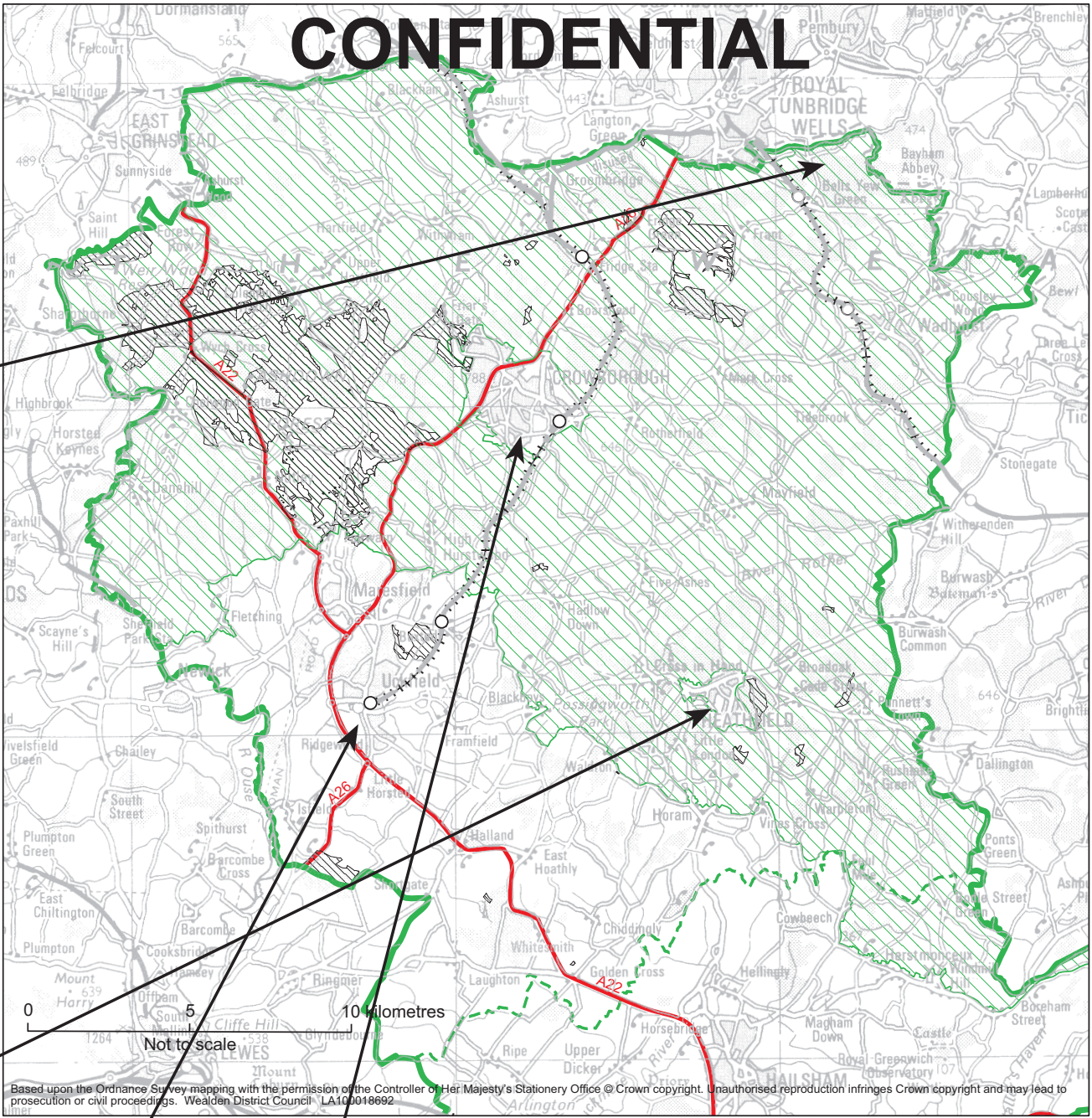
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Wealden District Council LA100018692



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Wealden District Council LA100018692



Rest of Wealden Policy Area
Potential Indicative Urban Extension Options

Key

Urban Extension Options 1-12

Other rail associated settlement expansion option

Unimplemented major allocation for review

Town Centre Opportunity

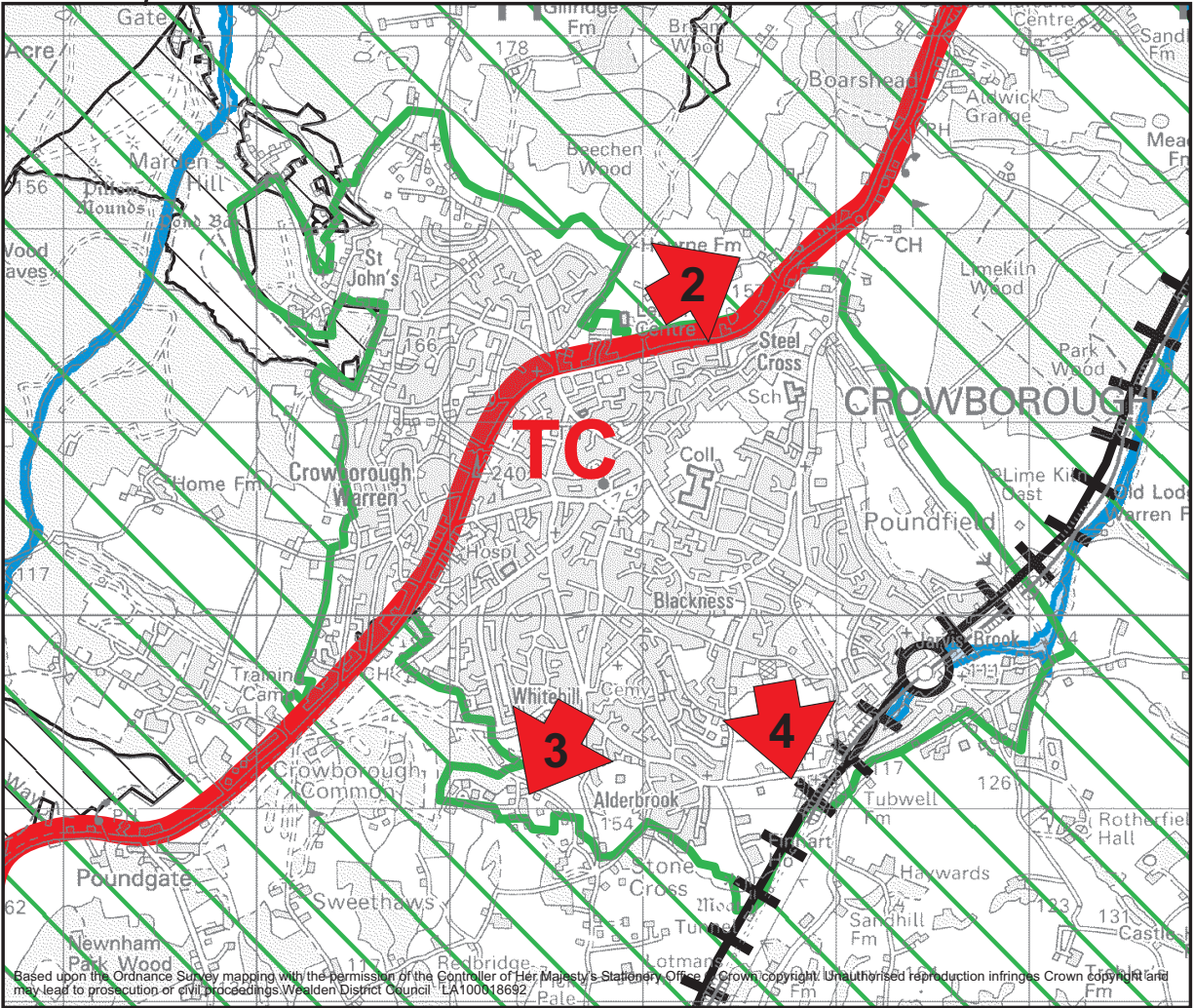
Primary Route

Rail Line/Station

High Weald Area of Outstanding Natural Beauty

Ashdown Forest SPA, SSSI, and Candidate SAC

Areas at risk of flooding



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Wealden District Council LA100018692

3.2 The following letter was issued to:

Arriva Southern Counties Ltd
BT Group PLC
Eastbourne Buses
Go Via
Country Liner
Network Rail
East Sussex County Council (Education & Transport)
NTL
Mobile Operators Association
Renown Coaches

my reference LDF0410/JW

Head of Planning & Environmental Policy
David L Phillips

ask for Jacqueline Watson

date 19 February 2007

Mr Steve Barrett
Eastbourne Buses
Birch Road
Eastbourne
East Sussex BN23 6PD

Council Offices, Pine Grove
Crowborough, East Sussex TN6 1DH
T: 01892 653311
F: 01892 602777
Minicom: 01323 443331
E: planning@wealden.gov.uk
W: www.wealden.gov.uk

your reference

Dear Mr Barrett

**WEALDEN DISTRICT COUNCIL'S LOCAL DEVELOPMENT FRAMEWORK
CORE STRATEGY: EARLY ENGAGEMENT**

Wealden District Council has commenced work on the preparation of its Local Development Framework. Last month, the Government Office for the South East agreed a revised Local Development Scheme setting out the timetable for the production of the various documents which will collectively comprise our Local development Framework. This year, our priority is to progress work on a Core Strategy for the District, which will provide a strategic overarching vision for the period up to 2026, in line with the emerging South East Plan. Our programme is to undertake a full public consultation on an Issues and Options paper in June 2007, before developing a Preferred Options Document for formal consultation in early 2008. The purpose of the Issues Paper is primarily to seek views on priorities and the main cross-cutting issues for the Core Strategy to tackle, and to identify an initial "long-list" of the possible locations for accommodating growth with information on their pros and cons.

We are now seeking the views of various bodies to help inform the production of our Core strategy Issues Paper, this letter is being issued to Network Rail, Southern Trains, local bus operators, East Sussex County Council, as Local Transport Authority and to communications providers. Initially, we are contacting you to gain an understanding of how you are

responding to the challenges of the South East Plan and to commence a dialogue on the constraints and opportunities within Wealden to help identify appropriate options for growth.

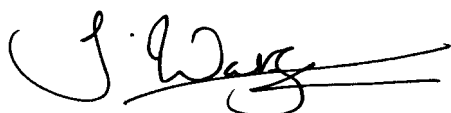
Whilst Local Development Frameworks must focus on setting out how Councils will accommodate future housing and economic growth in line with their relevant Regional Spatial Strategy, they also provide an important vehicle for helping to deliver the spatial requirements of key service providers, through identifying land for buildings and facilities or through setting out policies for developer contributions towards the cost of providing necessary and associated new infrastructure. We believe that our collective aims are likely to be more deliverable by aligning our respective plans, strategies and investment programmes. Consequently, we would also welcome any information which you can provide about your current forward planning programmes.

To begin our dialogue, I attach a brief set of questions which seek to ascertain what evidence we can share, to explore how best we can work together and to seek your views on some principles about where future development should be located. The questions on the attached sheet are not intended to be comprehensive, but simply to guide our future discussions, equally please feel free to raise other points and issues.

We would very much welcome the opportunity to meet with you or your nominated representative to discuss the points raised. Alternatively should you wish to send a written response at this stage or send any other relevant material which we should be taking into account, please write to me at the above address. We would be most grateful for some initial feedback over the course of the next few weeks. Please do not hesitate to contact me should you wish to discuss any aspect of this letter or the information and questions attached. If you would prefer to meet to discuss your views on the content of this letter, please contact me on 01892 602499.

We look forward to hearing from you soon.

Yours sincerely



Jacqueline Watson
Planning Policy Manager

cc. Brendan Wright, East Sussex County Council (For information)

Encs.
Questionnaire and Plan showing Wealden District

GENERAL QUESTIONS

Assisting Our Understanding of Your Remit, Current Plans and Future Investment Strategies

1. What forward planning do you undertake in assessing the future demands for your service? What timescale are you looking ahead to?
2. How are you responding to the changes likely as a result of the policies of the South East Plan (ie significant housing growth in the District)? What is the key driver in your own forward planning process?
3. What relevant plans, policies, strategies in relation to the provision of your service should we have regard to in producing our LDF?

Sharing/creating an Evidence Base to Justify Policies and Spatial Development Options in our LDF

4. What are the key issues for your service, to be addressed in Wealden's LDF and what evidence do you have to support this view?
5. In terms of your service, are there particular issues and challenges which are distinctive to Wealden which warrant a special response?
6. Have you undertaken any recent consultation or research, the results of which need to be addressed in our LDF?
7. In what way have you involved your customers/users/local community in shaping your own policy and practices in service delivery?
8. Can you provide any information on trends associated with your service, eg. Level of use, or information on route/network coverage or particular capacity constraints?

Helping Us to Support Your Requirements through our LDF

9. In which areas of Wealden do you consider there to be a need for new and improved facilities (for your service) irrespective of future development issues?
10. In what way are current shortfalls being addressed? Is there a role for the LDF in seeking to assist implementation? Eg. Station car parking site identification? How is it being funded?
11. Have you identified particular deficiencies in your service in meeting anticipated future needs and what action is being taken to address these, eg capacity?
12. What consideration is being given by train operators as to how the use of train services can be maximised/increased passenger demand accommodated? Eg. Additional services, increased station parking?
13. What measures are needed to increase use of public transport, which can be delivered through the LDF?
14. Are you aware of studies being carried out regarding formation of new routes or the feasibility of a new station?

Our Communications with You and Your Involvement in our LDF

15. Please confirm your preferred point of contact for future correspondence/communication;
16. Would you be willing to participate in other discussions/events, possibly with local parish council representatives;
17. How are you responding to similar requests from adjoining authorities, would it be helpful to have joint meetings with you, and if so with which authorities?

INITIAL CONSULTATION ON POSSIBLE DEVELOPMENT LOCATIONS AROUND TOWNS

See attached Plan of Wealden District, it shows the main towns in our District.

The South East Plan requires Wealden District Council to make provision for building 8,000 new homes over the period 2006-2026 (400 per annum). Of which some 4,600 are to be located in the southern part of the District (from Hellingly/Hailsham in the north to the

boundaries with Eastbourne in the south), and some 3,400 are to be located in the rest of the District north of Hailsham/Hellingly.

Given commitments already identified in the Non-Statutory Local Plan, it is envisaged that provision now needs to be made for a further 5,000 dwellings for the period 2011-2026. Of this 5,000, about 60% (3,000) will need to be in the southern part of the District, and 40% (2,000) in the rest of Wealden, although it is anticipated that there could be some limited flexibility in this distribution, provided that the overall total is achieved.

The South East Plan also makes it clear that most of the future development should be in the form of extensions to the main urban areas, although we will need to test this assumption. In addition to housing growth, the South East Plan also emphasises the need for economic development and balancing employment growth with housing growth. Whilst no targets on land areas or net additional floorspace have been set, the expectation is that significant amounts of land will also need to be allocated for employment purposes, to ensure that housing growth is matched by employment opportunities.

To help inform the identification of options as to where development should be located, we are seeking your views on a number of general principles, as set out below. All of the questions should be considered in the context of the delivery of your particular service.

18. From your own service perspective, is focusing most of the development around existing urban areas, the most appropriate solution for meeting the requirements of the South East Plan?
19. Do you favour the majority of development being split equally (as far as practicable) between the different urban areas or focused on one or two key areas?
20. Do any of the towns in Wealden have particular constraints (in terms of your own service delivery) which may preclude consideration being given to significant growth, irrespective of the specific part of the town? Can these constraints be overcome in any way and within what timescales?
21. What scale of growth should take place in the villages? We are intending to look at a range of scenarios ranging from 10% to 25% - what would be the implications in terms of the delivery of your service?
22. What issues (for your service) would be raised if a more dispersed pattern of development were to be pursued (in excess of 25%) with a greater share of development being allocated to villages around the District?
23. In terms of selecting which villages should accommodate some housing growth (ie. Up to 25% of the total), should only a few key service villages be targeted to accommodate the overall proportion, or from your own service delivery perspective, do you support a wider dispersal of development around more villages?
24. What specific transport (including accessibility by public transport) criteria should be taken into account in identifying villages which may be appropriate for some future development? Do you have a view on which settlements offer capacity for growth, in terms of your own service area?
25. Are there villages where further development could help improve the viability of existing public transport services/routes?
26. Do you believe that from your own service perspective consideration should be given to a new settlement or new settlement options? If so, why and where should it/they be and what size would be necessary to secure the necessary infrastructure? Please note that there is no requirement for a new settlement in the South East Plan, however new planning guidance on Housing does suggest that consideration may need to be given.

27. The expectation is that development will need to be phased over the lifetime of the Plan ie. To 2026. How will this phasing impact on service delivery and the timing of any new infrastructure required?
28. If there are particular constraints, from your own service perspective, should development be phased to focus on specific towns initially, and if so which?
-

3.3 A follow up reminder letter was also issued on 28 April 2007, as follows:

FOLLOW UP INFRASTRUCTURE CONSULTATION LETTER DATED 28 APRIL 2007

LDFearlyeng/0407

Head of Policy & Environment
David L Phillips

my

David Phillips

ask for

28 April 2007

date

Council Offices, Pine Grove
Crowborough, East Sussex TN6 1DH
T: 01892 653311
F: 01892 602777
Minicom: 01323 443331
E: planning@wealden.gov.uk

your

Dear

Wealden District Council's Local Development Framework Core Strategy: early engagement

I am writing to you following a letter you will have received from my colleague Jacqueline Watson, Planning Policy Manager, in February this year. You may recall that the letter explained that we are currently in the early stages of identifying and seeking views on priorities and the main crosscutting issues for the Core Strategy to tackle.

Our programme is to undertake a full public consultation on an Issues and Options paper in June of this year with the consultation period running for six weeks. This will lead to the development of a Preferred Options Document, which will be formally consulted on in early 2008.

It is key to the Local Development Framework that we seek, as early as possible, the views on the potential options available to us as a Council. In particular, we would very much welcome the views of service providers and infrastructure providers in respect of broad capacity issues and major stumbling blocks to new development across our five main towns; Crowborough, Hailsham, Heathfield, Uckfield and Polegate.

It would be most helpful to our LDF process if you might submit your summary views in writing to me by mid May, as I would like to be in a position to be able to update the Council's Members on the views of service providers at the next meeting of our LDF Sub Committee in early June. For your reference, I have enclosed a copy of the original letter you will have received from Jacqueline Watson. Whilst this sets out a number of queries, which may well require further detailed discussion and / or meetings, I look forward to receiving your summary views in the near future.

If you have any questions or would like to discuss the content of this letter, please do not hesitate to contact me.

Yours sincerely,

David L Phillips
Head of Policy & Environment

4.0 CONSULTATIONS WITH EAST SUSSEX DOWNS AND WEALD PRIMARY CARE TRUST (NHS)

- 4.1 The East Sussex Downs and Weald Primary Care Trust is responsible for the planning for doctor's surgeries and the commissioning of acute (hospital care). To address the issues raised in the consultation letter of 19 February 2007, a meeting with PCT representatives was held on 4 April 2007. Wealden District Council representatives have also attended a PCT event on planning for the future, which was held in June 2007. PCT representatives have also appeared before the Wealden District Council Cabinet Local Development Framework Sub-Committee to provide further information on health care in the District. See the agendas for further information.

NOTES OF MEETING

4 April 2007

10am at Hailsham Community Centre

Present:

David May, East Sussex Downs and Weald, Primary Care Trust
Graham Credland, East Sussex Downs and Weald, Primary Care Trust
Mark Paice, East Sussex Downs and Weald, Primary Care Trust
Jacqueline Watson, Planning Policy Manager, Wealden District Council
Caroline Adcock, Community Liaison Officer, Wealden District Council

Purpose of Meeting: To address issues raised in WDC's consultation letter of 19 February 2007 seeking comments about options for Wealden's Local Development Framework Core Strategy.

General Issues

1. The PCT made a request for better monitoring information to be provided by WDC. Need decision lists on planning applications. A single point of contact at WDC would be helpful to avoid confusion.
2. The PCT representatives confirmed that they personally had not been significantly involved in issues relating to the SE Plan. Other suggested points of contacts:
 - Kandy Morris – Head of Primary Care (she has been the key link with SE Plan, PCT and Strategic Health Authority);
 - Jim Davey – Director of Operations for Eastbourne and Hastings areas;
 - Sarah Valentine – Director of Commissioning for Primary Care;
 - Peter Finn, Director of Commissioning with Acute Trusts;
 - Ian Watley – Sussex Partnership Trust – based at Worthing, covering mental health issues for east and west sussex.
 - Brenda Darking – PCT Community Nursing – for information re. Community hospitals and health workers etc.
 - Ambulance Trusts – response time targets.
 - Andrew Demetriades, Estates – responsible for strategy on estates which is looking at capacity of all of the existing facilities. Expect strategy to be substantially complete by end of June.
3. The PCT has a commissioning role in providing health care for local communities. They are responsible for the following:

- contracts with GPs;
 - contracts with dental services;
 - contracts with pharmacists;
 - contracts with Sussex Hospital Trusts and also with Brighton, Tunbridge Wells & Maidstone, Haywards Heath.
4. In general, the level of population growth associated with the LDF has a much greater impact on primary care (GP) services than acute care (that is hospital care). Locally, at Eastbourne Hospital – about 80% of patients are from the Polegate and Eastbourne area, with the remaining 20% from the rest of East Sussex.
 5. The Annual contracts with Hospital Trusts include targets for the numbers of procedures to be carried out. Targets on waiting lists are defined by Government. Peter Finn will monitor waiting lists and can provide more information. Acute trusts cannot exceed waiting list limits.
 6. There is also a trend towards practice based commissioning. This involves a group of GPs coming together to provide certain services directly. Any cost savings are shared – 70% to GPs and 30% to PCT. However, this arrangement can also destabilise the acute care sector (which then has to focus only on the more significant procedures – more costly etc). It also has potential implications for capacity in the GP/primary care sector.
 7. The PCT is currently consulting on proposals to reconfigure services at Eastbourne and Hastings. It has 5 options for dealing with maternity. Both hospitals deliver in the order of 2,00 births – and this does not fit with the model arrangement for maternity.
 8. The minimum size of GP surgery supported by PCT is 2 GP practice, which serves a 4,000 population (although preference is for 3 GP practice). Dispensaries can help make rural practices more viable. For population growth in the order of 1,000, expanded surgeries are necessary, which may still need finding a new site where there is not a single obvious existing practice which is well located with the potential to be expanded.

Polegate Issues

9. There are 2 practices currently operating at Polegate: 1 is a 5 GP practice, the other is a 3 GP practice. There are constraints on the latter, which is based at Hampden Park, in terms of physical expansion. The Non-Statutory Plan makes provision for a new surgery which would accommodate immediate development demands. Further requirements would be dependent upon the direction of growth.

Hailsham Issues

10. Overall, no spare capacity for additional growth beyond the quantum identified in the Non Statutory Plan.

Uckfield Issues

11. A planning application for a new surgery is scheduled for May 2007, with a view to commencing work in July. This site is close to Tesco/Fire Station (referred to as Rocks Park). This facility will have the potential to accommodate about an extra 500 patients/250 homes, generated by developments over and above existing identified sites. No further capacity at Bird in Eye Hill and any development at east Uckfield will be difficult to serve. A new build practice and relocation of Bird in Eye surgery would be

necessary with options for east Uckfield. South and south west Uckfield are served by the town centre practice..

12. There are issues on the northern side of Uckfield where patients tend to go to Buxted. The Buxted practice will accommodate the Five Ash Down development and expansion at Maresfield. The new build at Buxted could also be designed to take patients from North Uckfield, but decisions must be made within 5 years.

Heathfield Issues

13. Heathfield has 2 practices, one in the High Street which is operating at full capacity and the other a branch surgery at Cross in Hand. Some residents also use the practice at Horam. Any significant development at Heathfield would present problems in terms of health care capacity.
14. There are discussions underway with GPs about options for expansion of practice capacity, but this is at a very early stage.

Crowborough Issues

15. Capacity in Crowborough has been expanded recently, which should offer the potential to absorb up to an additional 1,500-2,000 people.

Village Issues

16. An application to expand the Groombridge practice (for new permanent premises at Hartfield) is imminent. There are local calls for a branch surgery at Nutley, but there is not sufficient population growth to support this. There is enough capacity at the health centre at Forest Row to meet the needs of Nutley. Potential also exists to expand facility at Stone Cross, because not all of the available space is currently leased. Provision also in Wealden Local Plan Review for new surgery at East Hoathly.

5.0 CONSULTATIONS WITH EAST SUSSEX COUNTY COUNCIL

- 5.1 East Sussex County Council is responsible for a range of services, including education, library services, transport, strategic planning, minerals and waste. Initial consultation requests were issued to all of the above service areas, although it is recognised that the County has other responsibilities and interests. Comments are now welcomed from any relevant service area.
- 5.2 A combination of meetings and correspondence is reproduced below.

NOTES OF MEETING

**3 April 2007, 11.15-4.30pm, East Sussex County Council
at County Hall, Lewes**

Present:

Graham Arr-Jones, Principal Strategic Planner, Strategic Policy, Transport & Environment, ESCC;
Mike Langthorne, Strategic Policy Team Leader, Strategic Policy, T&E, ESCC;
Alison Horan, Head of Community Partnerships (until 12.15 only);
Joss Makin – Area Manager (north) Libraries and Information Services, ESCC (attending on behalf of Valerie Wright);
Tony Blackman, Head of Planning for Schools, Children's Services Department (from 12.30);
Brendan Wright, Assistant Section Manager for Wealden, Eastbourne & Hastings Area, Network Strategy, T&E, ESCC;
Kieran McNamara, Head of Strategic Economic Development and Skills (1-2pm only);
Andrew Preissner, Estates Manager, ESCC (1.30-2pm)
Jacqueline Watson, Planning Policy Manager, Wealden District Council
David Phillips, Head of Planning & Environmental Policy, Wealden District Council (until 1pm);
Duncan Morrison, Senior Planning Officer, Wealden District Council
Caroline Adcock, Community Liaison Officer, Wealden District Council

Purpose of Meeting: To address spatial planning issues addressed in WDC's letter dated 19 February 2007 concerning the development of Wealden's LDF Core Strategy Issues and Options.

Library Service

1. Usually apply a standard ratio of library floor space requirement to population growth of 32sqm per 1,000 population.
2. The minimum size for a new library is about 200sqm. Typically need about 2,500 new homes to generate the minimum size library through developer contributions. Prefer to have 2 staff at premises but partnership opportunities for shared premises and services are sought where appropriate. New technology for self-service terminals is also now available.
3. Where library expansion is considered necessary, contributions usually needed to pay for fit out and new equipment. A refit cost is typically in the order of about £40-50K.

Crowborough

4. Pressure on library at present (as too small for current demands), but potential for expansion linked to future of Pine Grove complex.

Uckfield

5. ESCC does not envisage major difficulties with population growth..

Polegate

6. Location and capacity may be significant issues at Polegate if the area is designated for major expansion. Depending upon the direction of growth, the existing location may need to be reviewed.

Heathfield

7. The library is below the ideal standard for square meterage for the size of its population. However, its High Street location generates good footfall and usage. Could cope with up to about 100 new dwellings.

Hailsham

8. Already an aspiration for shared new premises – east of Battle Road, but no funds available (except through developer contributions). ESCC did however acknowledge that they own the existing site, which could be realised to fund new provision, but this would depend on the priorities of ESCC's capital programme. Developers approaching ESCC on future for Hailsham.

Villages

9. Facilities at Forest Row, Wadhurst and Mayfield are at shared premises and single staffed. Difficult to contemplate significant expansion within existing locations Wadhurst seeking lottery funding for a new building project. There are also "village centres" i.e. a limited book loaning facility staffed by volunteers at Rotherfield and Alfriston. Books at these centres are exchanged every quarter.
10. A mobile library service exists – 2 services operating. ESCC to provide details of communities served by mobiles. The ability for incorporating additional stops would require further investigation. *ESCC subsequently provided this information which is appended.*

Strategic Planning Issues

11. ESCC has commissioned a set of population projections based on the SE Plan. In one set, housing levels act as a capacity constraint on migration. In a nil net migration scenario, there would not be a significant need to build new houses. ONS projections suggest increased demand from the Brighton & Hove market area – possibly twice the level assumed in the SE Plan. Employment projections will also be key, since these could determine the type and quantity of inward migration. ESCC to check projections and whether these can be supplied to WDC.
12. ESCC emphasised the need for employment space in the south of the District particularly and favoured NW Polegate as a business focused development.

Transport Issues

13. For Wealden, ESCC consider that trip rates will generally be in the order of 6-10 trips per dwelling per day, depending on the levels of accessibility provided at any single location.

Local Transport Plans

14. ESCC intend to roll forward all LTPs. LTP2 will be looking up to 2011, but will also identify some longer term aspirations. Work on LTP3 will commence within 3 years.
15. Transport Accessibility Strategy work on Uckfield, Heathfield and Crowborough is scheduled to be undertaken in 2007/8 and Hailsham, Polegate and Eastbourne in 2008/9. ESCC to provide WDC with copies of the briefs and timetable information for these studies. They have been commissioned by ESCC to identify scheme priorities but could help inform the LDF process. WDC raised concerns about the timetable and enquired whether the work could be brought forward.
16. Parking standards: ESCC has no current plans to revise its adopted standards.
17. ESCC also involved in feasibility study on Uckfield-Lewes rail reinstatement and work on south coast line linkages to Ashford. ESCC to provide details to WDC. Quarterly meetings with TOC/Network Rail and ESCC are held, WDC asked to be involved.

Edge of Tunbridge Wells

18. Concern about potential increase in traffic on roads linking to the A267 should development be located on edge of Tunbridge Wells. Local roads, including in Frant area, are poor and unsuitable for additional traffic.

Crowborough

19. Areas/options to the south of Crowborough have poor access and connections to A26 – there is little scope for improving this. Remoteness from the town centre and limited scope for securing meaningful public transport usage are also concerns for ESCC. Any solution would need to be bus based. Jarvis Brook is considered by ESCC to be a particular “pinch point” due to rail bridge. Options to the north of Crowborough offer the best scope in transport terms, and have good access to the A26. ESCC to assess options further.

Uckfield

20. Town centre capacity is the main constraint on future growth at Uckfield. The level of contributions from the Non-Statutory Local Plan allocations is now likely to fall short of the cost of solutions now being studied by ESCC. JMP has been commissioned to look at 3 options for dealing with the non-statutory Plan allocations. ESCC has no plans to upgrade any part of A22 or A26.
21. Areas to west and north-west of Uckfield could be potentially accessed via modified A22 junctions. Land SW of Uckfield – a new access from the A22 would not be supported. East of Uckfield – acceptability would depend upon deliverability of a link across the railway. South Uckfield considered to be remote from town.
22. ESCC to provide details of the options being considered for Uckfield town centre. Scheme cost expected to be in the order of £8M with a current £4M shortfall in contributions secured through new development. WDC encouraged ESCC to consult the public on those options in parallel with LDF process.
23. No other comments offered in relation to spatial options – ESCC to confirm.

Heathfield

24. Heathfield's poor connectivity with other towns was the major issue. Local access issues would be a concern for options west and south of the town. Areas east of the town are considered to be preferable from a transport perspective, particularly having

regard to the proximity of bus routes. The operation of the A265 and A267 will be improved by the planned upgrading of the A265/A267 and A267/B2102 junctions.

Hailsham

25. North Hailsham – development in this area would necessitate a new relief road on the grounds of safety, severance and capacity constraints on A271. Bowship roundabout also approaching capacity.
26. Work in relation to the Tesco proposals in the town centre is currently underway. Options are being developed as part of the Hailsham LATS and will be completed within a few months, ESCC to advise on progress and outcomes. All options will facilitate growth in Non-Statutory Local Plan. A second tranche of work is being carried out to look at the wider network.
27. West of the A22 could offer potential and it would be possible to connect to the A22 through a junction modification.
28. East Hailsham options would pose the same issues as north Hailsham, in terms of a need for a relief road for A271. The sustainable locational advantages of this option were however recognised together with the scope for walking and cycling.
29. South Hailsham is more difficult due to its poor links to the town centre, although a connection to the A22 as a southern relief road was not ruled out.

Polegate

30. North Polegate concerns about severance by A27 and/or A22 – although good pedestrian/cycle connections to Hailsham, via Cuckoo Trail. South Hailsham – issue of A2270 capacity will be a major constraint. ESCC to confirm its stance re. A new A22 junction to the north of Polegate. Any development between Polegate and A27 by-pass would necessitate traffic calming on Dittons Road.

Stone Cross Area

31. No direct route to primary route network – and poor connectivity to Eastbourne itself. New junction to A259 unlikely to be supported. Potential issue should this area be pursued as a location for park and ride. ESCC to advise of the situation.

Eastern Edge of Eastbourne

32. Seaside roundabout is major congestion point, which would limit potential of any options in the Pevensey Bay area.

Berwick Station

33. ESCC indicated that most trains do not actually stop, which reduces any sustainability advantages. Road connection to A27 good, although HA may have an issue with capacity of roundabout. Level crossing will also be a safety issue.

Youth Services

34. ESCC estimated that a new youth centre would not be needed until development reached about 10,000 houses. ESCC currently revisiting assumptions on this and will advise.

Education

35. As a general overview, half of secondary schools in Wealden are currently full and half are on sites which also have limited capacity for expansion. For primary schools, falling rolls is releasing capacity, but longer term forecasting work has yet to be carried out to estimate over what period of time this is likely to be the case. Also, rolls tend to be cyclical, so may rise again, but to what new level will be the issue. ESCC to provide WDC with a list of schools with falling rolls and to provide latest capacity figures. ESCC will complete analysis work on rolls within about 6 months. WDC asked whether development can be phased over the long term, allowing for a recycling of school places, having regard to pupil school life and projected rolls in the future. If rolls are falling now, at what point will they start to increase?
36. BSF (Building Schools for the Future) programme – this is a Government funding programme, that is intended to enable LA's to rebuild around half their Secondary schools, and refurbish/remodel the rest. ESCC is not due to receive funding until 2012/13 at the earliest, but has recently been allocated money for a One School Pathfinder in advance (to be Bexhill High School). DfES has also now introduced the Primary Capital Programme (PCP) to start from 2009/10, but to only rebuild/refurbish /remodel around 50% of Primary schools in total. ESCC will be starting to assess schools against BSF and PCP later this year, and will keep WDC informed.
37. ESCC confirmed that they are also reviewing work on Pupil Product Ratios to ensure robust and appropriate. Reference was made to work undertaken in Kent. Again, ESCC agreed to keep WDC informed accordingly. The Government's "parental preference" policies do not help when trying to manage admissions, however, these policies are not going to change.
38. Minimum school sizes: ESCC has adopted some policy guidance for Primary school sizes – in urban areas new schools should be not less than 1FE (but a 2FE is considered preferable for curriculum reasons ie. The breadth of subjects which have to be covered). For secondary schools, officers regard the minimum size for a new school as 6FE (900 pupils) but an 8FE (1,200 pupils) is preferable. As an indication of current costs, the new school at Bexhill is costing approx. £37M for 1,600 places. The land needed for Secondary school provision equates roughly to 1ha per FE.
39. Parts of Wealden are in the catchments of schools outside of the District – eg Ringmer and there are significant cross-border flows to and from Kent.
40. All of secondary school capacity assumptions will need to be reviewed if there is a Government decision to raise the leaving age to 18.

Crowborough

41. ESCC confirmed that Beacon School currently has some spare capacity and given that it occupies a large site, it could also expand if necessary. *ESCC subsequently advised that as the school is already at 10FE further expansion could be problematic.* Beacon has space for 1,900 pupils but current roll is nearer to 1,700 (*ESCC subsequently reviewed this figure down to 1,800*). Also significant spare capacity in primary sector. If no development takes place at Crowborough, the equivalent of one 1FE primary school will be spare. Currently, the greatest number of spare places is at Whitehill Primary.
42. As to spatial options, north Crowborough options which could separate new housing from schools (A26) would be less favoured.

Edge of Tunbridge Wells

43. Children would be eligible to attend Frant and Uplands, but in practice are likely to go to schools in Tunbridge Wells. WDC to liaise with KCC.

Uckfield

44. The Community College does not have much spare space, if any and is already too large for its site. One solution may be a separate 6th form facility. ESCC to advise what scale of growth would be necessary to support such an option or alternatively a wholly new school.

Heathfield

45. ESCC confirmed that the secondary school is full and the site is operating above capacity, only very small scale development at Heathfield could be accommodated – eg. About 250 homes, generating up to 50 additional children. The school capacity is 1,350 (*ESCC subsequently advised that some extra accommodation is being added*) so could potentially cope with this due to overlaps with other school catchments which could be restricted if necessary. Capacity of primary schools at Heathfield is not a key issue.

Hailsham and Polegate

46. There is capacity (200 places) in the secondary sector at Hailsham, but a large number of new residential schemes are coming through, hence a separate post 16 centre is being pursued (Whitehouse site). Polegate: Willingdon secondary has no spare capacity, the options in the south are to expand Causeway (up to 3 ha available) and/or Eastbourne Technology College. All other Eastbourne Secondary schools are forecast to be full. Others may also be full but have not been assessed at the time of writing. All other Eastbourne schools are full. The Cavendish School is in need of replacement.
47. WDC enquired about general need for a new secondary school in Polegate/Eastbourne area. ESCC to advise. WDC highlighted the importance of the LDF in helping to deliver this.

County Community Strategy

48. Expect to be produced by April 2008. Considerable emphasis on sustainability and transport. A new LAA in place from next year – by summer.

Economic Development

49. ESCC emphasised the need for additional employment land (B1, B2 and some B8) in the Crowborough area.

Appendix: List of Communities Served by Mobile Libraries

Alphabetical list of mobile library stops

Stop	Time	Mobile	Day	Week
Alciston, opp Rose Cottage	10.40 – 11.00	Mobile Library One (Polegate)	Tuesday	2
Alfriston, Dene's Road	9.30 – 10.10	Mobile Library One (Polegate)	Tuesday	2
Arlington, Yew Tree Inn	11.40 – 12.05	Mobile Library One (Polegate)	Tuesday	2
Ashburnham	9.50 – 10.15	Mobile Library Two (Hastings)	Thursday	2
Barcombe, Weald View	10.45 – 11.15	Mobile Library One (Polegate)	Thursday	1
Beckley, Village Hall	1.15 – 2.00	Mobile Library One (Polegate)	Friday	2
Bells Yew Green, Rushlye Close	3.55 – 4.15	Mobile Library Two (Hastings)	Tuesday	2
Berwick, Village Hall	12.15 – 12.45	Mobile Library One (Polegate)	Tuesday	2
Bexhill, Cowdray Park	11.50 – 12.35	Mobile Library Two (Hastings)	Saturday	2
Blackboys, Mount Pleasant	2.50 – 3.30	Mobile Library One (Polegate)	Wednesday	2
Bodiam, Levetts Lane	3.35 – 3.55	Mobile Library Two (Hastings)	Thursday	1
Bodle Street Green, Village Hall	10.30 – 10.55	Mobile Library Two (Hastings)	Wednesday	2
Brede Village Hall	1.35 – 2.25	Mobile Library Two (Hastings)	Thursday	1
Brightling, Village Hall	11.25 – 11.50	Mobile Library Two (Hastings)	Thursday	2
Broad Oak, Brede, Reedswood Rd	4.50 – 5.10	Mobile Library Two (Hastings)	Tuesday	1
Broad Oak, Brede, Oakhill Drive	4.00 – 4.40	Mobile Library Two (Hastings)	Tuesday	1
Burwash Weald, Scout Hut	2.10 – 2.35	Mobile Library Two (Hastings)	Thursday	2
Burwash, Christ the King	12.10 – 12.35	Mobile Library Two (Hastings)	Thursday	2
Burwash, Rother View	1.30 – 1.55	Mobile Library Two (Hastings)	Thursday	2
Buxted, Buxted Court, Gordon Rd	4.05 – 4.25	Mobile Library One (Polegate)	Saturday	2
Buxted, Church Lane	1.15 – 1.35	Mobile Library One (Polegate)	Saturday	1
Camber, Castle Public Hse	10.20 – 11.00	Mobile Library Two (Hastings)	Monday	1
Camber, Pelwood Road	9.45 – 10.15	Mobile Library Two (Hastings)	Monday	1
Catsfield, Village Hall	4.15 – 4.45	Mobile Library Two (Hastings)	Saturday	2
Chailey, Grantham Close	2.25 – 2.50	Mobile Library One (Polegate)	Tuesday	1
Chailey, Markstakes Corner	12.15 – 12.40	Mobile Library One (Polegate)	Thursday	1

Chailey, Mill Lane	11.45 – 12.05	Mobile Library One (Polegate)	Thursday	1
Chalvington, Postbox	1.55 – 2.15	Mobile Library One (Polegate)	Tuesday	2
Chelwood Gate, Village Hall	3.55 – 4.35	Mobile Library One (Polegate)	Thursday	1
Chiddingly School	12.00 – 12.30	Mobile Library One (Polegate)	Wednesday	1
Cooksbridge, Little Mead	3.00 – 3.45	Mobile Library One (Polegate)	Tuesday	1
Cripps Corner, White Hart	10.20 – 10.45	Mobile Library Two (Hastings)	Thursday	1
Crowborough, Montargis Way	12.15 – 12.55	Mobile Library One (Polegate)	Saturday	1
Crowborough, Nevill Court, off Beacon Rd	10.45 – 11.30	Mobile Library One (Polegate)	Saturday	1
Crowborough, Warren Drive, Fielden Rd	11.40 – 12.00	Mobile Library One (Polegate)	Saturday	1
Crowhurst, Blacksmith's Field	10.45 – 11.05	Mobile Library Two (Hastings)	Saturday	2
Crowhurst, Forewood Rise	9.40 – 10.00	Mobile Library Two (Hastings)	Saturday	2
Crowhurst, Station Car Park	10.10 – 10.35	Mobile Library Two (Hastings)	Saturday	2
Dallington, Village Hall	10.40 – 11.00	Mobile Library Two (Hastings)	Thursday	2
Danehill Oak Tree Cottages	3.15 – 3.45	Mobile Library One (Polegate)	Thursday	1
Deanland Caravan Park	9.15 – 11.20	Mobile Library One (Polegate)	Wednesday	1
Ditchling, Dumbrell's Court	11.15 – 11.45	Mobile Library One (Polegate)	Tuesday	1
Ditchling, The Bull, car park	10.35 – 10.55	Mobile Library One (Polegate)	Tuesday	1
East Dean, Village Hall	11.40 - 12.40	Mobile Library One (Polegate)	Friday	1
East Hoathly, Lydfords, High Street	9.20 – 9.45	Mobile Library One (Polegate)	Wednesday	2
East Hoathly, Church	4.25 – 5.00	Mobile Library One (Polegate)	Tuesday	2
Eastbourne, Avarde Cres.	9.55 – 10.15	Mobile Library One (Polegate)	Friday	1
Eastbourne, Coventry Court	12.05 – 12.55	Mobile Library Two (Hastings)	Friday	1
Eastbourne, Homegate House	10.45 – 11.15	Mobile Library One (Polegate)	Friday	1
Eastbourne, Latimer Road	2.55 – 3.40	Mobile Library Two (Hastings)	Friday	1
Eastbourne, Sovereign Court	1.50 – 2.35	Mobile Library Two (Hastings)	Friday	1
Etchingham, Village Hall	4.00 – 4.40	Mobile Library Two (Hastings)	Thursday	2
Ewhurst	4.05 – 4.25	Mobile Library Two (Hastings)	Thursday	1
Fairlight Cove,	9.40 – 1.00	Mobile Library Two	Tuesday	1

Shepherd's Way		(Hastings)		
Fairwarp, Foresters Arms	10.55 – 11.30	Mobile Library One (Polegate)	Wednesday	2
Firle, opposite Post Office	9.15 – 10.00	Mobile Library One (Polegate)	Thursday	1
Fletching, Car Park behind Village Hall	1.25 – 1.45	Mobile Library One (Polegate)	Wednesday	2
Flimwell, opp. 'Longbranch'	3.35 – 4.20	Mobile Library Two (Hastings)	Friday	2
Four Oaks, Village Hall	11.35 – 12.15	Mobile Library One (Polegate)	Friday	2
Framfield, Beckett's Way	3.40 – 4.00	Mobile Library One (Polegate)	Wednesday	2
Framfield, Framelle Mount	2.10 – 2.30	Mobile Library One (Polegate)	Wednesday	2
Frant, Village Hall	10.15 – 10.55	Mobile Library One (Polegate)	Saturday	2
Groombridge, Broad Oak	12.10 – 12.35	Mobile Library One (Polegate)	Saturday	2
Groombridge, The Ridge	1.30 – 1.50	Mobile Library One (Polegate)	Saturday	2
Groombridge, Village Hall	11.30 – 12.05	Mobile Library One (Polegate)	Saturday	2
Guestling, Allards	09.40 – 10.10	Mobile Library Two (Hastings)	Wednesday	1
Guestling, The School	12.15 – 12.35	Mobile Library One (Polegate)	Thursday	2
Hadlow Down, St Marks Church	1.45 – 2.05	Mobile Library Two (Hastings)	Wednesday	2
Hailsham East, Community Centre	12.55 – 1.25	Mobile Library One (Polegate)	Wednesday	1
Hailsham, Southdown Court, Bell Banks Rd	2.20 – 3.05	Mobile Library One (Polegate)	Wednesday	1
Hailsham, Cedars, Milland Road	3.40 – 4.20	Mobile Library One (Polegate)	Wednesday	1
Hartfield, Castle Fields	2.40 – 3.20	Mobile Library One (Polegate)	Saturday	2
Herstmonceux Woolpack	10.40 – 11.20	Mobile Library Two (Hastings)	Friday	2
Hooe, opp. Denbigh Court	1.50 – 2.35	Mobile Library Two (Hastings)	Saturday	2
Horam, Horebeech Lane	2.30 – 3.20	Mobile Library Two (Hastings)	Wednesday	2
Horam, Paynsbridge Way	3.40 – 4.10	Mobile Library Two (Hastings)	Wednesday	2
Hurst Green, Village Hall	2.25 – 3.15	Mobile Library Two (Hastings)	Friday	2
Icklesham, Brede Valley View	4.20 – 5.05	Mobile Library Two (Hastings)	Wednesday	1
Icklesham, Old Post Office	3.35 – 4.05	Mobile Library Two (Hastings)	Wednesday	1
Iden, Village Hall	12.05 – 12.45	Mobile Library Two (Hastings)	Monday	1
Langney, St Richard's	11.15 – 11.45	Mobile Library Two (Hastings)	Friday	1
Laughton, Village School	3.05 – 4.05	Mobile Library One (Polegate)	Tuesday	2

Maresfield, Village Hall	11.55 – 12.25	Mobile Library One (Polegate)	Wednesday	2
Mark Cross, Mark Cross Inn	3.15 – 3.40	Mobile Library Two (Hastings)	Tuesday	2
Mountfield, Hoath Hill	9.25 – 10.05	Mobile Library Two (Hastings)	Thursday	1
Netherfield Stores	11.55 – 12.15	Mobile Library Two (Hastings)	Friday	2
Newick, Oldaker	2.25 – 2.55	Mobile Library One (Polegate)	Thursday	1
Newick, South Rough	1.50 – 2.20	Mobile Library One (Polegate)	Thursday	1
Ninfield, Downsview	3.40 – 4.05	Mobile Library Two (Hastings)	Saturday	2
Ninfield, Millfield	2.50 – 3.25	Mobile Library Two (Hastings)	Saturday	2
Norman's Bay Caravan park	9.45 – 10.15	Mobile Library Two (Hastings)	Friday	2
Northiam, Godden Gill	2.40 – 3.10	Mobile Library Two (Hastings)	Thursday	1
Nutley, Fords Green, layby	10.05 – 10.40	Mobile Library One (Polegate)	Wednesday	2
Peasmarsh, Memorial Hall	2.40 – 3.00	Mobile Library Two (Hastings)	Monday	1
Peasmarsh, The Maltings	1.45 – 2.35	Mobile Library Two (Hastings)	Monday	1
Pett Level Nr.Smugglers	11.45 – 12.15	Mobile Library Two (Hastings)	Wednesday	1
Pett, Chick Hill (Top)	11.10 – 11.35	Mobile Library Two (Hastings)	Wednesday	1
Pett, Church of England	10.20 – 10.50	Mobile Library Two (Hastings)	Wednesday	1
Playden, Poppyfields	11.30 – 11.50	Mobile Library Two (Hastings)	Monday	1
Plumpton, Old School lay-by	12.50 – 1.20	Mobile Library One (Polegate)	Tuesday	1
Plumpton, The Fountain, car park	12.10 – 12.45	Mobile Library One (Polegate)	Tuesday	1
Punnetts Town, opp. the school	11.45 – 12.25	Mobile Library Two (Hastings)	Wednesday	2
Ringmer, Delves House, Delves Close	4.15 – 4.45	Mobile Library One (Polegate)	Tuesday	1
Ripe, Lamb Inn	2.20 – 2.45	Mobile Library One (Polegate)	Tuesday	2
Robertsbridge. Nr, George Inn	1.20 – 2.10	Mobile Library Two (Hastings)	Friday	2
Rotherfield, The School	9.30 – 10.00	Mobile Library One (Polegate)	Saturday	2
Rushlake Green, Osborne Pk	11.10 – 11.35	Mobile Library Two (Hastings)	Wednesday	2
Rye, Tilling Green	2.10 – 3.25	Mobile Library Two (Hastings)	Tuesday	1
Seaford, Merrifield Ct, Edinburgh Rd	1.50 – 2.20	Mobile Library One (Polegate)	Friday	1
Seaford, Mitchell House, Lexden Dr.	2.35 – 3.15	Mobile Library One (Polegate)	Friday	1
Seaford, Old Ben,	3.25 – 3.55	Mobile Library One	Friday	1

Chyngton		(Polegate)		
Seaford, Old Ben, Chyngton	3.25 – 3.55	Mobile Library One (Polegate)	Friday	1
Sedlescombe, Park Shaw	10.55 – 11.35	Mobile Library Two (Hastings)	Thursday	1
Selmeston, Village Hall	11.05 – 11.30	Mobile Library One (Polegate)	Tuesday	2
St Leonard's, Bexhill Road	9.25 – 9.55	Mobile Library One (Polegate)	Thursday	2
St Leonard's, Bulverhythe Rd	10.00 – 10.30	Mobile Library One (Polegate)	Thursday	2
St Leonard's, Warrior Square	10.55 – 11.55	Mobile Library One (Polegate)	Thursday	2
Staplecross, Cricketers Field	12.00 – 12.35	Mobile Library Two (Hastings)	Thursday	1
Stonegate, Village Hall	3.00 – 3.30	Mobile Library Two (Hastings)	Thursday	2
Three Oaks	12.50 – 1.25	Mobile Library One (Polegate)	Thursday	2
Ticehurst, Car Park	10.00 – 12.30	Mobile Library Two (Hastings)	Tuesday	2
Ticehurst, Horsegrove Avenue	1.25 – 1.45	Mobile Library Two (Hastings)	Tuesday	2
Uckfield, Cedars Close	4.10 – 4.30	Mobile Library One (Polegate)	Saturday	1
Uckfield, Millington Court, Mill Lane	2.45 – 3.30	Mobile Library One (Polegate)	Saturday	1
Uckfield, Streatfield House, Southview Drive	3.40 – 4.00	Mobile Library One (Polegate)	Saturday	1
Udimore, Lower Cross Cott.	10.15 – 10.40	Mobile Library One (Polegate)	Friday	2
Udimore, opp. 'Little Stocks'	10.55 – 11.15	Mobile Library One (Polegate)	Friday	2
Wadhurst, Durgates	2.15 – 3.00	Mobile Library Two (Hastings)	Tuesday	2
Wannock, Village Hall	9.00 – 9.30	Mobile Library One (Polegate)	Friday	1
Westfield, Church Fields	3.30 – 3.55	Mobile Library One (Polegate)	Friday	2
Westfield, Geary Place	2.25 – 3.15	Mobile Library One (Polegate)	Friday	2
Westham, Church Bailey	10.00 – 10.45	Mobile Library Two (Hastings)	Friday	1
Wilmington, Ades Field	4.35 – 4.55	Mobile Library One (Polegate)	Friday	1
Winchelsea Beach, opp. Windmill Way	12.25 – 1.15	Mobile Library Two (Hastings)	Wednesday	1
Winchelsea, Castle Street	2.25 - 3.10	Mobile Library Two (Hastings)	Wednesday	1
Windmill Hill, Hurst Lane	9.50 – 10.20	Mobile Library Two (Hastings)	Wednesday	2
Withyham, Dorset Arms	2.05 – 2.25	Mobile Library One (Polegate)	Saturday	2
Wivelsfield Green, Village Hall	9.45 – 10.20	Mobile Library One (Polegate)	Tuesday	1

NOTES OF MEETING OF 16 MAY 2007

NOTES OF MEETING 16 MAY 2007

EAST SUSSEX COUNTY COUNCIL: TRANSPORT INPUT TO LDF CORE STRATEGY ISSUES AND OPTIONS REGULATION 25 CONSULTATION

Present:

Graham Arr-Jones, Principal Strategic Planner, East Sussex County Council – Transport & Environment

Brendan Wright, Assistant Section Manager for Wealden, Eastbourne & Hastings Area, East Sussex County Council, Transport & Environment;

Jacqueline Watson, Planning Policy Manager, Wealden District Council

Marrianne Boorer, Assistant Planning Officer, Wealden District Council

Purpose of Meeting: To address spatial planning issues raised in WDC's letter dated 19 February 2007 concerning the development of Wealden's LDF Core Strategy Issues and Options and to continue debate on points arising from meeting of 3 April 2007.

General Matters

1. ESCC setting up an internal LDF Group which should be established by June, a specific Wealden LDF group will also be set up. This will help facilitate input in to the LDF process in a timely fashion;
2. ESCC confirmed that responses/inputs to the LDF to date are based on existing data/work. ESCC will provide a full list of studies to which reference is made and issue to WDC.
3. ESCC agreed to clarify their policy stance re. Road capacity and mitigation.
4. Modelling – ESCC confirmed that it has traffic models for Eastbourne/Polegate (Mott MacDonald) (devised for EBC to look at highway schemes in the Eastbourne Park area) and for Hailsham (covering town centre and being extended to rest of Hailsham) and Uckfield. ESCC to advise extent of models and potential to utilise or enhance models to assess options for the Wealden Core Strategy process, in partnership with WDC. ESCC to offer dates for a meeting with WDC to discuss potential use of models.

Edge of Tunbridge Wells

5. Principal issue relates to the poor quality connections to the A26/A267, which could entail southbound traffic having to use unsuitable routes. Bus service connections to central Tunbridge Wells also poor. Capacity on Benhall Mill Road (within East Sussex boundary) not an issue.

Crowborough

6. Options to the south of Crowborough are problematic. Option 3 has better access to A26 and connections to town centre via Whitehill. Western Road is a problem for developing in areas 3 and 4. On-street parking and safety, due to conflict with 2-way traffic. ESCC to advise whether any recent traffic counts undertaken at Western Road. Connections to the town centre are also poor, with limited potential for promoting sustainable transport, due to rural character of surrounding lanes.

7. There are capacity issues in the town centre at Crowborough Cross, but potential to mitigate via upgrading bus routes and possible junction improvements.

Heathfield

8. Main issue is poor public transport connections to surrounding villages and rail stations. Area 12 at south Heathfield is the most problematic in terms of access and links to town centre, although if accessed from B2203 potentially little to choose between 3 options. Capacity on the A267 is not a key issue.

Uckfield

9. The town centre is the principal issue. Study now concluded and a presentation by ESCC to WDC is being organised. Copies of the study will also be provided shortly. ESCC believed that the study had a time horizon to 2020, but only incorporated Non-Statutory Local Plan developments and not any growth likely post 2011 to meet the South East Plan. ESCC to advise (in consultation with Jon Wheeler) whether further testing could be undertaken using the model to assess options for Wealden. WDC specifically requested information on the following:
 - Whether the scheme options for the town centre offer any “headroom” for developments post 2006;
 - If yes, how much additional development, if any, could be accommodated under each option; and what would be the optimal location for new development to maximise newly created road capacity.
10. ESCC reaffirmed their position that they do not intend to undertake consultation on scheme options until all monies all collected from developments in the Non-Statutory Plan. Given the potential deficit in funding which would still remain, it was accepted that further development in the Uckfield area could generate the funding necessary to secure the scheme. WDC continued to urge ESCC to reconsider their position re. Consultation and invited ESCC to make information available as part of the LDF consultation process.
11. The main issue with Area 9 (Bird in Eye) relates to the connections with the town centre. Development would necessitate a bridge over the railway – there are issues re. Viability and land holdings. The concerns about parking on Framfield Road are capable of being addressed
12. Area 8 at Ridgewood is considered to be relatively remote, however a large scale development could potentially support a viable public transport connection to the town centre. It was noted that this area was considered suitable by ESCC planners (in landscape terms) for assessing potential for Structure Plan housing numbers.
13. The potential to achieve an acceptable access would be the main issue for area 7. ESCC policy would not support the formation of a new access from the A22. ESCC reaffirmed that its policy for the A22 is to ensure that it serves as a primary route for through traffic, although not to further improve to attract traffic away from the trunk road box. No upgrades would therefore be supported. WDC urged ESCC to review its policy on the A22 to have regard to the requirements of the SE Plan.
14. Area 6, west of the A22 would present problems of severance from the built up area, although it would be capable of being accessed from the existing junction. Area 5 can be accessed from a modified A22 junction. If bus services, including to Haywards Heath, can be enhanced, it would reduce potential impact of traffic on the A22.

Hailsham

15. ESCC made reference to developers promoting East Hailsham and confirmed that a meeting has taken place with developers to agree a scoping for their assessment work.
16. For north Hailsham, ESCC maintained that development would necessitate a new A271 relief road. Traffic calming of A271 was not considered appropriate and securing a traffic order to apply speed restrictions below 30 mph on this key route would be problematic.
17. Area 4 – south Hailsham would necessitate a link road through the development areas. Connections to town centre are poor and bus routes would need to be improved.

Polegate

18. ESCC emphasised the importance of achieving grade separation at Cophall as part of any trunk road improvement, to help encourage traffic to use the A22 new route as a way in to Eastbourne and provide some relief for the A2270.
19. Access to area 6 (north Polegate) via the existing residential area may not be suitable. Area 7 would not present any significant issues for a development of less than 100 dwellings, in isolation, but further improvements to the Wannock Road signalised junction could be required if developed in combination with other Polegate sites, especially in Area 8. Area 5 can be accessed via a modified junction at Bay Tree Lane. However, further junction modelling would be required to assess capacity.

LETTER FROM EAST SUSSEX COUNTY COUNCIL DATED 22 MAY 2007

date
22 May 2007

please contact
Brendan Wright
01273 482284
E-mail: brendan.wright@eastsussex.gov.uk

our ref
WLDF

CFD/BIW

your ref
LDF0410/JW

Dear Mr. Phillips

Wealden Local Development Framework Core Strategy: Early Engagement

I refer to your letter dated 28th April 2007, in which you seek views on the indicative spatial development options that accompanied Jacqueline Watson's letter of 19th February 2007 and formed the basis of our meeting early in April.

My comments are intended to identify the principal transport infrastructure constraints to delivering growth within the District and provide an overview of the practicalities that would need to be addressed in the broad locations you are currently considering. I have initially sought to focus on the spatial options that are associated with the five main towns in the District but can provide you with further comments on the prospective alternatives in due course if that would be helpful.

As you are aware, the County Council does not have a county-wide network model at its disposal to enable road capacity constraints to be systematically defined across the District. My comments have therefore been based on the County Council's knowledge of transport infrastructure pressures, gained from the work undertaken in support of the Local Transport

Plan and the analysis of Transport Assessments submitted in support of planning applications. I regard this to provide a useful overview that can inform the inception of the District Council's Core Strategy.

Before discussing the location specific issues that could affect growth within the five towns, I would want to convey the over-arching principles that are enshrined within 'The Future of Transport' White Paper published by the Department for Transport (DoT) in July 2004. The paper highlights how building greater capacity on transport networks is not, in isolation, an appropriate way forward and sets out a strategy to 2030 for balancing the need to travel with improving the quality of life. This is important in the context of future planning and the ongoing drive towards sustainable communities.

Having regard to the current limitations of transport infrastructure within Wealden District, I would want to emphasise the need for the Core Strategy to support the delivery of appropriate improvements, such as new or enhanced bus services, by facilitating critical mass(es) of development that can collectively absorb the costs. This approach would achieve greater economies of scale to a scattering of development sites across the District which, although spreading the impact over a wider area, offers less potential for any worsening deficiencies to be successfully overcome. It would be appropriate for Transport Assessments and area-wide Travel Plans to be devised to inform any evolving development stratagem, although I would highlight that the County Council does not have sufficient resources at its disposal to undertake work of this nature.

Sussex Coastal Towns Sub-Area

In the context of any growth at Hailsham or Polegate, it will be paramount to achieve high quality connectivity along the corridor to Eastbourne, encompassing Polegate rail station. This would need to be largely based around enhanced public transport, consisting of high frequency bus services and appropriate bus route infrastructure. The ability of these to incorporate rail interchange and form part of convenient linkages to more remote travel demand destinations such as Brighton would also be important in managing the impact of additional travel demand across the wider network. This is principally critical to the effective operation of the A27 trunk road, but in turn carries implications for the county network in how local traffic is distributed.

A prospective west of Polegate trunk road improvement forms a crucial component in strengthening the strategic function of the A27 and ensuring that it is not undermined by local traffic growth arising from new development. The potential worsening of operational inefficiencies on the A27 could serve to impact upon alternative County routes, thereby giving rise to a more expansive scope of highway improvements necessary to mitigate the adverse impact.

Hailsham (Options 1- 4)

The transportation studies undertaken for the purposes of the non-statutory Local Plan initially assessed a more substantive level of development within the northern part of Hailsham than was ultimately allocated and therefore provides a useful proxy for gauging the implications of further growth in this part of the town. The A271 was identified as a major constraint, primarily on account of there being no conceivable on-line improvement that could overcome the fundamental issues of safety and severance. Whilst there may be a need to revisit the modelling exercise that was undertaken to inform the studies through reference to the County Council's Hailsham network model, the findings also highlight the likelihood that the capacity of the road would be breached. This would carry consequences for the operational function of the A271, accessibility to the town and conditions for local residents.

Drawing from this body of evidence, it is clear that further growth would be likely to necessitate the provision of a Hellingly/Lower Horsebridge Bypass as part of overcoming the current deficiencies of the A271. This would be most pertinent to options 2 and 3, which would both place a heavy reliance on the A271 as a means of accessing the A22 Primary Route. By virtue of its proximity to the town centre, option 3 would offer a better prospect of

facilitating a higher proportion of non-car journeys, but the need to deter car trips through the town centre would appear to reduce the scope for the degree of impact on the A271 to be minimised to a level where any requirement for an off-line improvement can be averted. Option 2 offers less potential in this respect as it would be largely dependent on bus based travel as an alternative to car use.

It would be important for any Hellingly/Lower Horsebridge Bypass to have specific regard to capacity limitations at the Bowship roundabout, which could not be addressed as part of any wholesale widening of the A22 due to the overriding need to ensure there is no capacity incentive for strategic traffic to deviate from the trunk road network.

Option 1 poses a specific difficulty in how to overcome the severance effect of the A22 dual carriageway in providing connectivity to the existing built-up area. Dedicated at-grade facilities would not be appropriate on account of the volume and speed of traffic and there are design difficulties associated with creating bridges and underpasses that are safe and appealing to use.

The County Council would resist any prospective new development access junction onto the A22 as there is a need to preserve the functional integrity of Primary Routes as a route for longer distance traffic. There could however, be scope to serve option 1 via an adapted existing A22 junction, subject to the usual safety and capacity criteria being met.

The merits of Option 4 would be dependent on the provision of road linkages to the existing network, which could suitably be focused on South Road and Ersham Road in the absence of other suitable roads that could facilitate access to the A22.

Polegate (Options 5 – 8)

The level of growth that can be accommodated within Polegate will, to a large degree, be determined by improvements to the trunk road network and how these could influence localised pressures on the County network. More specifically, a prospective west of Polegate improvement would have an important bearing on capacity along the A2270 and the scope to downgrade this road as part of a strategy to enhance the status of the A22 as the principal approach into Eastbourne.

The transportation studies undertaken on the non-statutory Local Plan identified how, even with a west of Polegate trunk road improvement, the A2270 would operate at a level close to its intended capacity. This reinforces the imperative of ensuring that there is a reduction in strategic traffic using the A2270 so as to free up available capacity for additional development, particularly in the light of Options 7 and 8. Further work, using the County Council's Eastbourne/Polegate network model could test the implications of different development scenarios in this respect and provide an understanding on the extent to which the internal Eastbourne network could be affected by further growth at Polegate.

Option 5 raises similar issues to those in Hailsham in how it could imply potential new access junctions onto the A22 dual carriageway. More appropriately, it is plausible that the existing Bay Tree Lane approaches to the A22 could be upgraded to facilitate access, although these may be affected by any prospective trunk road alterations to the Cophall Roundabout. The severance effect of the A27 is lessened by the presence of the two existing bridges, although it would be necessary to ensure that the routes across these form safe and attractive linkages towards the town centre.

Access to Option 6 would be dependent on the creation of suitable approach roads through the existing residential areas. In their current form, the roads offer variable potential according to carriageway width, extent of highway boundary and existing on-street parking. This could serve to limit the scope of improvements and more detailed assessments would be needed to ascertain the scale of new development that they could accommodate. The location of the access routes could also have a bearing on route choice to access the trunk road and county primary road networks, although negative safety and severance impacts on the B2247 could be overcome through appropriate mitigation works.

Rest of Wealden Policy Area

Crowborough (Options 2 – 4)

The growth potential of southern Crowborough, as proposed by options 3 and 4, would be dependent on the extent to which the inadequacies of the local highway network can be successfully overcome. These are largely founded on the unsuitability of Western Road to accommodate increased traffic demand to and from the east and the absence of any workable on-line solution to remove on-street parking whilst maintaining convenience for existing local residents who are not afforded off-street parking. Further study work could be helpful in understanding what scope is available to improve conditions along the road but it is, at this stage, difficult to envisage how the road user conflicts created by the lack of two-way traffic flow could be overcome without significant new road building.

Option 4 carries the additional constraint of a network of country lanes that represent unsuitable connections to surrounding areas, including the town centre and Jarvis Brook local centre. Any wholesale widening and realignment would involve a sizable number of existing private properties and alter the rural character of the area in view of the need to provide dedicated footways with street lighting.

With this in mind it is likely to be necessary to achieve a substantive scale of development capable of sustaining enhanced bus services to the town centre, Jarvis Brook and, potentially, Tunbridge Wells. This could be realised through a combination of Options 3 and 4 but would be dependent on the ability of buses to negotiate or bypass Western Road as part of a route with good levels of service reliability.

Option 2 is less problematic in how it is better placed in relation to the town centre and could be connected to the A26 and bus services to Tunbridge Wells and the rail station. It would be important for these linkages to provide scope for any worsening of junction capacity at The Cross (A26/B2100) to be suitably mitigated.

Uckfield (Options 5 – 9)

Recent planning applications have identified how the current capacity and safety difficulties on the town centre network represent a potential obstacle to future growth in the absence of a deliverable highway improvement scheme. The timely prospect of such a scheme coming forward could be dependent on whether additional major development is envisaged for the town, as the County Council would not regard a progressive 'natural' growth in existing network traffic to represent a justifiable case for using its own funding mechanisms to achieve further capacity improvements to the town centre.

This is consistent with the philosophy of the aforementioned DoT White Paper and has regard to an accepted tolerance of congestion occurring during peak periods. The difficulty posed by Uckfield is that there is no scope to increase operational capacity within the existing network and any further growth of the town would necessitate a traffic management scheme capable of coping with the prospective magnitude of impact.

As you are aware, the County Council has commissioned a study that tests potential scheme options against the traffic impact of the non-statutory Local Plan land allocations. This incorporates a network model that could be used to test future LDF development scenarios and further work would be necessary to understand the extent to which the various scheme options could enable further growth to be accommodated. As part of this exercise, full regard would have to be given to a potential reinstatement of the Uckfield-Lewes rail line as part of ensuring that any realisation of this improvement to the rail network is not unduly prejudiced.

Setting aside the technicalities of mitigating traffic impact on the town centre, it would be important to achieve a critical mass of development within town capable of facilitating the delivery of an appropriate scheme. The study work to date has indicatively estimated costs to exceed £8million and this would be likely to rise by 10% per annum in the light of increasing

costs within the construction industry. The timeframe associated with any scheme delivery would be dependent on the District Council exercising its CPO powers to assemble the land and the likelihood of future developments benefiting from those planning obligations already secured, which hold available scheme contributions for a 10 year period.

Having regard to the finite capacity limitations of any town centre solution, there will be an onus on identifying those sites that offer the best potential for sustainable travel to the town centre. Options 5 and 7 are most promising in this respect in that they are well placed to facilitate good connections to the town centre that could reduce reliance on the car. Option 9 also provides some scope but is dependent on the delivery of a rail line crossing as part of creating a more direct route to the town centre than is currently available. Options 6 and 8 are more challenging in that the former is severed by the A22 and the latter is remotely located with limited existing bus services.

Access to the A22 Primary Route additionally forms an important influence on travel and option 9 fares poorly in this respect in how northbound journeys would be likely to gravitate through the town centre. All of the other options could be afforded more direct connections, although the County Council would resist those that would necessitate the creation of a new junction. This would be most likely to hinder option 7, where there appears to be little prospect of adapting an existing junction.

All of the options would give rise to the issue of capacity on the A22 Uckfield Bypass due to it already operating close to its intended design capacity at peak periods. In accordance with the County Council's principle of not improving capacity on the A22, mitigation for a large scale development could only be achieved through improved bus service and infrastructure connections to out-commuting towns such as Haywards Heath, East Grinstead, Brighton and Crawley.

Heathfield (Options 10 – 12)

The relative merits of each of the options differ little in terms of overall accessibility, aside from the relative remoteness of option 12 to the town centre. They all however, lack the public transport connections that are necessary to cater for travel demand to destinations further afield such as access to the rail network and key employment/shopping centres such as Eastbourne and Tunbridge Wells. For this to be achieved as part of creating sustainable communities, a sufficiently substantive amount of development would need to be created as part of ensuring that new or enhanced bus services can operate viably over a number of years, thereby enabling them to establish a patronage and ultimately become self-financing.

I hope you find these comments helpful and please let me know if any further clarification would be helpful.

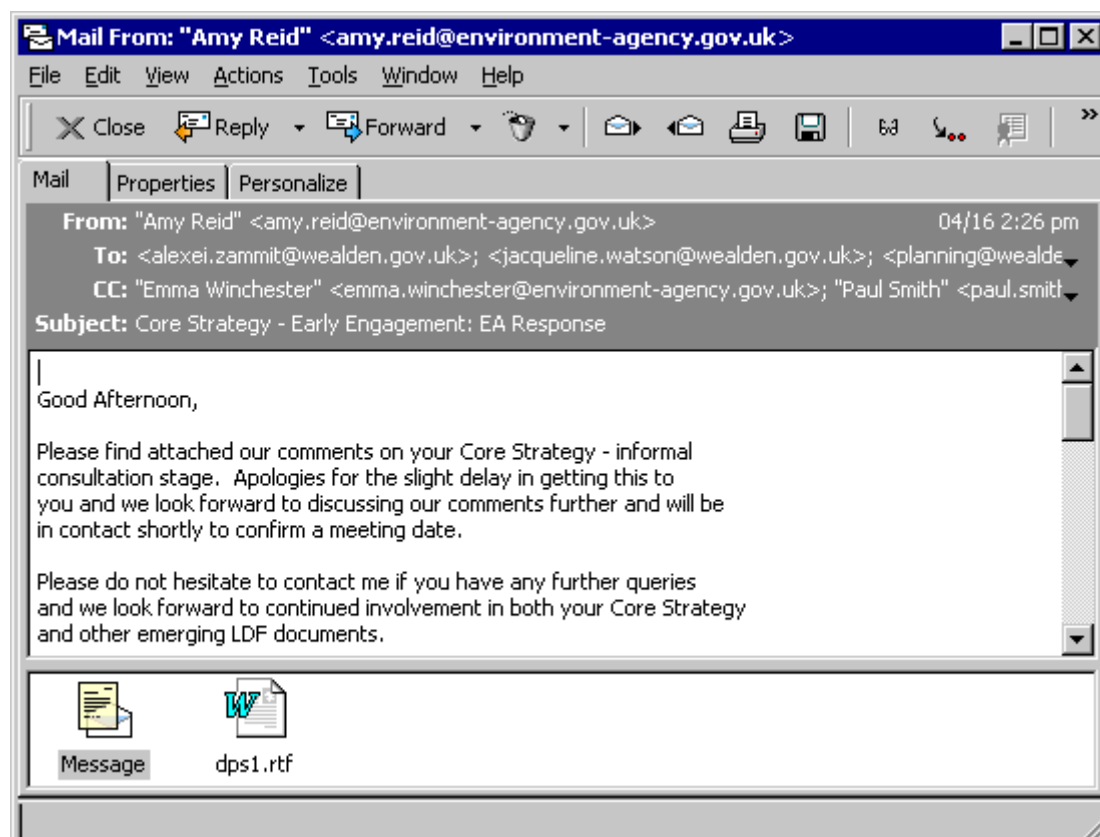
Yours sincerely

Brendan Wright
Assistant Manager
Development Control (Transport)

cc: Graham Arr-Jones – Strategic Policy
Mark Valleley – Transport Strategy
Jon Wheeler – Transport Strategy
Eric Portchmouth – Transport Policy & Monitoring

6.0 CONSULTATIONS WITH THE ENVIRONMENT AGENCY

6.1 The Environment Agency's response dated 16 April 2007 is reproduced below.



Attachment dps1.rtf dated 16 April

Jacqueline Watson
Wealden District Council
Council Offices Pine Grove
Crowborough
East Sussex
TN6 1DH

Our ref: SX/2006/000271/CS-
01/IC1-L01
Your ref: LDF410/JW
Date: 16 April 2007

Dear Jacqueline

Core Strategy - Informal Consultation

Thank you for giving us the opportunity to provide comments on your Core Strategy at this early stage. We have the following general comments to make as well as more specific comments relating to issues raised within our remit included in your questionnaire and the possible areas for growth identified around Wealden.

General Comments

Water Quality

As you are well aware, there are a number of capacity issues associated with sewage treatment works within the Wealden District. It is therefore essential that the need for adequate infrastructure to be in place prior to any development in your District is a clear message of your Local Development Documents (LDD's).

Flood Risk

We are aware that your local authority is currently undertaking a Strategic Flood Risk Assessment (SFRA) in conjunction with Eastbourne Borough Council.

Although it is accepted that you have utilised our flood maps to undertake your initial assessment we reiterate that these maps are indicative only of flooding from main rivers and the coastline. Annex 3 of the PPS25: Development & Flood Risk (PPS25, December 2006) lists all forms of flooding that should be taken into consideration. As such we can make general comments on flood risk at this stage, however, we will need to reserve judgement on any site allocation or broad area identified until completion of your SFRA. The SFRA should also be used to inform the preferred options of the Core Strategy for the identification of broad locations.

It should be noted that PPS 25 contains revised climate change figures for fluvial and tidal flood risk. As such it is unlikely that our maps show the full extent of the floodplain required by these revised climate change figures.

It would appear, from the enclosed plans, that the majority of the sites are either adjacent to, or have, floodplains in the immediate vicinity. This is particularly relevant at Pevensey, Polegate, Hailsham and Uckfield where flood risk and surface water disposal is likely to restrict the extent of any potential development sites.

As I am sure you will appreciate we expect any proposals to follow the sequential test, and where necessary, the exception test, as set out in Annex D of PPS25.

On completion of your SFRA we will be in a position to make further, and more site-specific comments.

Waste

East Sussex County Council (ESCC) is the Waste Planning Authority (WPA) responsible for waste planning issues within Wealden District. A joint Waste Local Plan has been recently adopted by ESCC and Brighton & Hove City Council. The joint WPA are currently starting preparatory work on the Core Strategy of the Minerals and Waste Development Framework which will eventually replace the Waste Local Plan.

Development Plan Documents (DPDs) and Supplementary Planning Documents (SPDs) should be in general conformity with the Regional Spatial Strategy (RSS)/Regional Planning Guidance which is currently RPG9. This will be replaced by the South East Plan which is currently under examination (we understand the panels report will be published this summer). Minerals and waste policies within the Draft South East Plan have not changed significantly from those presented as updated chapters to RPG9 Minerals & Waste (June 2006). These regional policies provide some degree of certainty to inform waste planning decision.

SPECIFIC QUESTIONS RELEVANT TO OUR REMIT

ASSISTING OUR UNDERSTANDING OF YOUR REMIT, CURRENT PLANS AND FUTURE INVESTMENT STRATEGIES

2. Do you/can you require developer contributions towards the cost of providing your service/infrastructure?

Should any improvements be required to any of our services/infrastructure, or if any flood mitigation measures were required, we would expect them to be fully funded by the developer.

5. What relevant plans, policies, strategies in relation to the provision of your service should we have regard to in producing our LDF?

Although this is in no means an exhaustive list and deals primarily with plans, policies and strategies within our remit, we recommend you have regard to the following documents:

International

- The Water Framework Directive (2000/60/EC)
- EC Directive 2001/42/EC – SEA Directive

National

- Planning and Compulsory Purchase Act 2004
- PPS 1: Delivering Sustainable Development
- PPS 9: Biodiversity and Geological Conservation
- PPS10: Planning for Sustainable Waste Management
- PPS 12: Local Development Frameworks
- PPG 20: Coastal Planning
- PPS 23: Planning & Pollution
- PPS 25: Development & Flood Risk (December 2006)
- Biodiversity: UK Action Plan
- Making Space for Water, DEFRA
- Code for Sustainable Homes
- Environment Agency Groundwater Protection: Policy and Practice. (GP3)
- Sustainability Appraisal of Regional Spatial Strategies and Local Development Frameworks (ODPM, 2005)
- A Better Quality of Life – UK Sustainable Development Strategy (March, 2005)
- Sustainable Development – UK Government's Approach
- RPG9 Waste & Minerals (DCLG June 2006)
- MPS1: Planning & Minerals (DCLG November 2006)

Regional

- Regional Spatial Strategy (RSS)
- Draft South East Plan
- SEERA Climate Change Guide
- Beachy Head to Selsey Bill Shoreline Management Plan (SMP) & The South Foreland to Beachy Head SMP.

County

- East Sussex and Brighton and Hove Waste Local Plan
- East Sussex Structure Plan

Local/District

- Cuckmere & Sussex Havens Catchment Flood Management Plan (CFMP)
- Cuckmere & Pevensey Levels Catchment Abstraction Management Plans (CAMs, March 2007 available at: www.environment-agency.gov.uk/regions/southerns/582283/310255/?version=l&land=e)

- Parish Plans and Village Design Statements
- The Cuckmere Estuary Partnership

SMPs, CFMPs & CAMS – Further Information

For your information, we note that both SMPs and CFMPs are of particular interest to the Agency in relation to the coast:

Shoreline Management Plans

The aim of a Shoreline Management Plan (SMP) is to provide the basis for sustainable coastal defence policies and to set objectives for the future management of the shoreline. Sustainable coastal defence policies need to take account of the interaction between defences, developments and coastal processes and they should avoid, as far as possible, committing future generations to inflexible and expensive options for defence. Shoreline Management Plans are led by the maritime local authorities with input from the Agency and other interested parties.

Coastal flooding and erosion are managed through Shoreline Management Plans. The coastlines of the Cuckmere and Sussex Havens CFMP are included in the *Beachy Head to Selsey Bill Shoreline Management Plan* and the *South Foreland to Beachy Head Shoreline Management Plan*. These two SMPs focus primarily on the open coast and the management of coastal defences.

The *Beachy Head to Selsey Bill Shoreline Management Plan* (First Review, 2005) shows that the boundary between the SMP and the CFMP at Cuckmere Haven is at the mouth of the estuary. This document recommends that the long-term plan for Cuckmere Haven is to no longer intervene with this coastline and to allow natural processes to re-create a self-sustaining system. The *South Foreland to Beachy Head Shoreline Management Plan* (First Review, 2005) covers Eastbourne, Pevensey Bay, Bexhill, Bulverhythe and Hastings and recommends a continuation of the policy of 'hold-the-line' along the coast.

Catchment Flood Management Plans

CFMPs will provide a large-scale strategic planning framework for integrated management of flood risks to people and the developed and natural environment in a sustainable manner.

The Cuckmere and Sussex Havens CFMP is made up of five relatively small catchments draining into the English Channel. These are: the Cuckmere River; the Pevensey Levels; the Willingdon Levels; Wallers Haven and Combe Haven. Together these catchments extend from Seaford to Hastings on the coast and to Heathfield inland, incorporating all of Eastbourne, Bexhill and Hailsham and including parts of the proposed South Downs National Park and the High Weald Area of Outstanding Natural Beauty (AONB). The Pevensey Levels, some 4,000 hectares in area, is also a nationally important habitat and is protected as a Site of Special Scientific Interest (SSSI) and a Ramsar site.

Catchment Abstraction Management Plans

CAMS set out how water resources are managed at a local level. The CAMS process identifies the amount of water available for abstraction and compares this with the amount needed by the environment. From this a management/licensing policy is proposed to improve the sustainability of water resources for the future.

The Cuckmere and Pevensey Levels CAMS incorporates the catchments of the River Cuckmere, the Combe Haven and those associated with the Pevensey Levels. The CAMS area also encompasses a large section of the South Downs stretching from Seaford to Eastbourne.

Public water supply abstraction dominates this CAMS area with important strategic sources on the River Cuckmere (at Arlington), the Wallers Haven (at Hazards Green) and the groundwater sources of the Seaford-Eastbourne Chalk Block.

Although much of the area suffered from significant flooding during the winter of 2000/2001,

pressure from new development and rising household demand is increasing the need for water. Resources are finely balanced between meeting the demands of existing abstractions and the need to protect river flows to meet environmental and other in-stream requirements. This is illustrated by the general presumption against any further consumptive abstraction from the Chalk aquifer and from rivers during the summer.

SHARING/CREATING AN EVIDENCE BASE TO JUSTIFY POLICIES AND SPATIAL DEVELOPMENT OPTIONS IN OUR LDF

6. What are the key issues for your service, to be addressed in Wealden's LDF and what evidence do you have to support this view?

- Reducing Flood Risk
- Climate Change
- Encouraging Sustainable Drainage Systems (SuDS)
- Water Resources: Encouraging more sustainable use of waters
- Protection of Water Quality (Surface and Ground waters)
- Biodiversity – Protection and Enhancement
- Contaminated Land: Protecting & Restoring land and soils
- Waste: Promoting wiser and more sustainable use
- Recreation: Contributing where we can to help improve access to green space, coastal and other waters.
- Air Quality: Working at local and regional level to promote regional air quality strategies.
- Encouraging Sustainable Building/Construction techniques

7. In terms of your service, are there particular issues and challenges, which are distinctive to Wealden, which warrant a special response?

As highlighted throughout our comments from our perspective it is water quality (specifically in relation to STW's capacity) and flood risk that will provide the greatest challenges for development within Wealden District. Notwithstanding this however, other environmental factors such as the protection of controlled waters, groundwater and contaminated land, nature conservation and water resources will need to be taken into consideration.

8. Have you undertaken any recent consultation or research, the results of which need to be addressed in our LDF?

Please see our comments relating to more specific questions below – i.e. water supply, drainage and waste for details of studies undertaken that may assist the preparation of your emerging LDF.

INITIAL CONSULTATION ON POSSIBLE DEVELOPMENT LOCATIONS AROUND TOWNS

Questions 21, 22, 23 and 25

Please see our comments relating to the specific locations identified as potential growth areas.

WATER SUPPLY

1. Would it be possible to supply a copy of the most recent 5 year Water Resources Plan and most recent annual review, together with information on how the District receives its supply at present?

The 2004 water resources plans are the most recent and show how a company intends to maintain the balance between supply and demand over the next 25 years. The water companies did not publish the plans but did produce a public summary. The relevant water companies should be approached for this information.

2. What preparatory work is being undertaken on the next review?

It is now a statutory duty for water companies to produce water resources management plans. This process (which will involve consultation in due course) will begin very soon. These plans will have to be finalised for use in Ofwat's next Period Review of water company business due to be determined in 2009. Again, the relevant water companies should be approached for this information.

3. Which areas of the District have particular constraints in terms of water supply/pressure, having regard to the overall predicted deficit for the period to 2015/2016?

Our report entitled "Response to latest South East Plan housing provision and distribution received from SEERA" (May, 2006) assessed the water supply-demand balance implications of two housing growth scenarios to year 2025/26:

- 28,900 households per annum, representing the **district level** distribution from policy H1 of the draft South East Plan submitted to government on March 31st 2006. This amounts to 580,000 new homes across the SEERA region by 2026.
- 40,000 households per annum, reflecting general indicators that higher housing growth (than policy H1) should still be considered. This amounts to 800,000 new homes across the SEERA region by 2026.

Six corresponding water efficiency scenarios were considered and applied in combination with either only new homes or with 20% or 40% of existing homes:

- The achievable range of water efficiency lies between 8% and 21% in agreement with the water companies of the region;
- 47% savings, reflecting the highest standard in the ODPM consultation: "Proposals for introducing a Code for Sustainable Homes" (Dec. 2005).
- Per capita consumption capped at 80, 100 or 120 litres per head per day.

The following resource development scenarios were also assumed:

- Baseline resources (no resource development beyond that expected by 2009/10).
- Further resources (resource development to 2030 as proposed by water companies in their PR04 (2004) final water resources plans).

The report identified that the housing growth scenarios can be accommodated in the supply-demand balance of the Wealden district by 2016 subject to assumptions about water efficiency and resource development. Indeed, an approximate balance exists for all water resource zones if resource development (as proposed by the respective water companies 2004 water resources plans) and only 8% water efficiency in new homes is achieved.

With respect to water company abstractions licences that provide water to the relevant water resources zones at present; these have not been identified as having a detrimental impact on the environment. This assessment was undertaken through our Catchment Abstraction Management Strategies (CAMS) process. The relevant CAMS are each published on the internet or are available as hard copies on request.

4. Of the 5Ml/d bulk supply likely to be achieved by completion of the Bewl-Darwell and Hazards Green works, how much will be taken by developments already committed in Local Plans, including the Wealden Non-Statutory Plan or meeting current supply/pressure issues?

South East Water should be approached for this information as it relates to their water services infrastructure.

5 What are the constraints associated with each of the main urban areas and

the options identified for initial investigation? How can these be overcome and will it influence the scale and timing of development in particular areas?

The relevant water companies should be approached for this information as it relates to their water services infrastructure.

6) & 7) We understand that consideration is being given to increased capacity through a proposed desalination plant at Newhaven and a proposed reservoir at Clay Hill. How will these schemes impact on the timing of development taking place in particular localities? What are the options if they do not proceed?

South East Waters' PR04 water resources plan identifies a desalination plant and a new reservoir at Clay Hill as two potential options for meeting future demand. Whilst the latter is provisionally scheduled for 2014/15, it remains one of five reservoirs proposed in the SEERA region (along with an Upper Thames reservoir, the enlargement of Bewl reservoir, Broad Oak reservoir and Havant Thicket reservoir). It is important to note that not all of these reservoirs may be required and timings of construction may change as further investigations progress. Equally, other resource development alternatives may yet be determined, for example effluent reuse schemes.

Across the SEERA region as a whole, water company water resources plans propose more resource development than is needed even if the 40,000 per annum housing growth scenario and high water efficiency savings (as summarised above) are assumed. As a result of this, a detailed options appraisal will follow also considering the use of existing and notional transfers between neighbouring resource zones to make best use of surplus resources where and when they exist, rather than adopt the resource development preference that might be assumed in a water company water resources plan.

In the water resources in the south east group, the Environment Agency, Ofwat and water companies are working together to progress joint understanding of the best overall strategy for further water resources planning.

DRAINAGE

1. (a) What is the programme for the completion of the Wealden growth study and can you offer a view on the likely impact on the options and growth potential of Polegate and Hailsham?

The Wealden Growth Study has been commissioned by Southern Water. A number of my colleagues from different teams met Southern Water in Summer 2006 to discuss the early stages of this study and we have not received any further updates with regards to the work undertaken. We recommend you contact Southern Water directly in relation to this study.

(b) We understand the constraints associated with the capacity of the Hailsham treatment works (north and south) particularly in terms of the issue of drainage to the Pevensey Levels, and naturally are keen to understand the latest situation

Surveys & Findings - Hailsham Sewage Treatment Works

The following information will also be useful to inform your Sustainability Appraisal.

Our Ecological Appraisal team has conducted four invertebrate surveys on Hailsham North and South STWs between 1979 - 1995. The 1979 study of the Western Pevensey Levels indicated that Hailsham North was having a serious polluting effect on the upper Hurst Haven. Water Quality Improvement Plan (WQIP) surveys in 1994 and 1995 noted a much-reduced impact from the STW's since the late seventies, although an impact was still detectable downstream of the discharge. The 1994 report (E027ES942) stated that a significant impact

was not recorded but potentially masked by naturally limited fauna. The 1995 survey detected a larger impact than 1994 (B174WD952).

Hailsham South was surveyed in 1991, when it was shown that the discharge from the STW was impacting ecological quality of the White Dyke up to 1 km downstream (X165PL794). The WQIP surveys of 1994 indicated that there had been an improvement in water quality since the 1991 survey.

The 2004 Catchment Report identifies declines in ecological quality at routine sites on the Pevensey Levels below both Hailsham north and south. It is apparent that since 1995 there has been a down turn in ecological quality on watercourses receiving water from the Hailsham sewage treatment works.

There is also suggestion that the nutrient enrichment from Hailsham North is aiding the spread of the non-native floating pennywort on the Hurst Haven.

Further Monitoring undertaken at Hailsham

Any ecological monitoring in the future will be targeted on the tributaries feeding the Hurst Haven catchment and whether the water quality of these tributaries are affecting water quality above the sewage treatment works. Flowing out of Hailsham town centre it is unlikely that these tributaries can achieve similar quality to that observed on the main Cuckmere but improvements are possible, and will be needed with the increase of planned development around Hailsham. With limited space available in Hailsham developers would be looking to maximise the allocated land they are given, this putting strain on a sewerage infrastructure that appears to be approaching capacity. This can be assessed in the future by the occurrence of pollution incidents downstream of the pumping stations in Hailsham as well as fluctuations in water quality immediately downstream of the sewage treatment works.

Infrastructure/ Discharge	Impact	Comments
Amberstone CSO	Slight organic enrichment	No control site
Town Farm Estate PS	Organic enriched	No control site
Howards Close	No impact recorded	Very poor habitat/quality at control site
Horsebridge PS	Slight impact	Reduction in scores when compared to upstream site

- Diatoms

Diatom analysis of samples taken in 2006 downstream of Hailsham North and South STW indicates that both watercourses are demonstrating high levels of nutrient enrichment.

- Ongoing studies

In 2004 nutrient stripping was put in place as part of the Urban WasteWater Treatment Directive at both sewage treatment works and post monitoring of this work (macrophytes and diatoms) is currently underway.

Both Hailsham North and South STW were monitored as part of a wider survey of sewage treatment works in 2006. We are currently waiting for this data to come back from contractors.

2. What other work, if any, is being undertaken in advance of the 2009 Periodic Review, which is relevant for Wealden?

Following on from our comments on question 1(a) above, we were approached by Southern Water to provide indicative consents for strategic sites in the Wealden District. A copy of this response to alternative discharge sites around Hailsham is attached for you information.

Our Ecological Appraisal team has highlighted that other discharge points for sewage effluent have been discussed. Willingdon Sewer, (using the historic Polegate STW/pumping station) has been

identified as being capable of taking additional discharge. Although we hold little data on the Willingdon Sewer the lower end is used for recreational angling (through a series of large online lakes) and the ditch network has the potential to hold species of conservation importance, much like the nearby Pevensey Levels and Lewes Brooks. Further work will be undertaken in 2007 to provide data on these sites.

A pollution incident in 2004 was responsible for a large fish kill on the Willingdon Sewer following failure of the Polegate pumping station. Increased flow through this station could place the infrastructure under considerable pressure, increasing the likelihood of more frequent, unplanned discharges in to the Willingdon Sewer.

3. Wealden's Local Development Scheme does not envisage adoption of our Core Strategy until 2010, how will this impact on the timing of the 2009 Review and the ability to secure funds to invest in improvements for the future, beyond our current plan period of 2011?

The majority of investment into Sewage Treatment Works (STW's) is to account for population growth is expected to be funded outside the 2009 Periodic Review process so we recommend you consult with the Water Companies directly in regard to this issue. However there may be a few specific instances under the Urban Waste Water Treatment Directive "emission standards" where PR funding could be applicable, but Ministerial guidance is still being awaited as to exactly how this will be determined. Note: Initial Ministerial Guidance is due in December 2007 with Final Ministerial Guidance in January 2009.

4. We also understand that there are constraints associated with the size of the outfall for surface water drainage, in the Eastbourne area. Again, how is this issue being addressed and how will it impact on the options and timing for growth in the southern part of the District?

The joint SFRA currently being undertaken by yourselves and Eastbourne Borough Council should address this issue. In addition it is our understanding that this has also been addressed in the assessment of the existing Eastbourne Park Flood Alleviation review.

5. Are there particular capacity constraints associated with Drainage which would preclude particular urban options or particular villages within the District?

The Environment Agency study on Water Quality and Growth in the South East (11th October, 2006) sets out where there are STW environmental constraints within Wealden District (available on web at:

<http://www.environment-agency.gov.uk/regions/southern/955496/1661262/?version=1&lang=en>).

However we suggest contacting Southern Water with regard to the most up to date capacity constraints. As mentioned earlier, we highlight that in all cases, adequate sewage collection and treatment facilities must be provided before new houses are built in any location and it is important that this is made clear throughout the policies of your LDD's.

With regards to surface water disposal and in accordance with PPS25 we recommend that Sustainable Drainage Systems (SuDS) be the primary source of controlling surface water disposal from new development sites. Such systems do have land take implications and these should be considered at the earliest stage within the planning process, and in particular for your Site Allocation DPD.

WASTE

1. A number of facilities appear to be operating close to capacity already, on what basis is the need for additional facilities associated with growth now calculated?

The RSS provides forecasts of waste requiring management into the future. It also identifies the shortfall in waste management (landfill) capacity by WPA. The WLP/W MDF identify what facilities (type/scale etc) are required, based on the data for waste arisings, forecast waste growth and new development, existing capacity and further required capacity etc. A review of existing facilities (adequacy, capacity, and potential for expansion etc) usually forms part of this process.

2. Are there particular constraints associated with geographic locations associated with handling the consequences of waste generation?

The WLP/W MDF should identify the criteria/constraints that are relevant to the location of new waste sites.

1. The location of landfill sites is guided by the need to protect groundwater, our position is set out in Landfill Directive Regulatory Guidance Note 3 (version 4.0, December 2002) Groundwater protection: locational aspects of landfills in planning consultation responses & permitting decisions (www.environment-agency.gov.uk/commondata/103599/rqn3version4.0december2002final.).
2. We will reject applications for composting operations with a boundary less than 250 metres from 'sensitive human receptors' (i.e. a workplace or the boundary of a dwelling) unless a risk assessment demonstrates that there are site specific reasons why the compost facility will not pose a risk to neighbouring properties.

COMMENTS ON POTENTIAL URBAN EXTENSION OPTIONS

Flood Risk

We highlight that Pevensey, Polegate, Hailsham and Uckfield all have flood risk and surface water disposal issues associated with them and this is likely to restrict the extent of any potential development at these locations.

Water Quality Concerns

Sussex Coastal Towns Sub Area

Sites 1-3

There is no public foul sewer at these locations. The nearest public foul sewer drains to Hailsham South STW.

Sites 4-8

There is no public foul sewer at this location. The nearest public foul sewer drains to Hailsham North STW.

For the above sites there may be capacity issues at Hailsham North and South sewage treatment works. We have been working with SEERA and the water companies (Thames Water and Southern Water) to identify locations where there is a risk that the sewage treatment works will be unable to treat the sewage from the proposed new housing to the standards required to protect water quality using current best available technology.

It has been recommended that for Hailsham South STW's, a limit of 2460 new homes be imposed on housing beyond that already connected. At Hailsham North a limit of 2960 new homes is recommended, as outlined in the "Planning for Water Quality and Growth in the South East" document available on the SEERA website at: http://www.southeast-ra.gov.uk/southeastplan/publications/research/wq_and_growth-report.pdf.

For information, this figure does not take into account any proposals which already have planning permission, but are yet to be built and also those currently in the planning system but are yet to gain permission.

Any applications for private sewage treatment works would be subject to the same figures above if they were to discharge to the same catchment.

Sites 9 and 10

Development at this site would drain into Eastbourne STW and there are currently no water quality issues associated with this STW that we are aware of

Rest of Wealden Policy Area

Sites 5, 6, 8

There is no public foul sewer at this location. The nearest public foul sewer drains to Uckfield sewage treatment works. There are currently no water quality issues with this STW, although Southern Water will need to be consulted regarding capacity in the sewer as there are known problems in Uckfield.

Sites 7 & 9

These sites drain to Uckfield sewage treatment works. As above, there are no issues with the STW, although Southern Water will need to be consulted regarding capacity in the sewer as there are known problems in Uckfield.

Ecology Concerns

All these proposed broad areas are greenfield sites and by the nature of the landscape have many landscape features that will act as constraints to development. It is therefore difficult to assess at this stage which of the sites are less or more favourable for development. Ancient and ghyll woodlands, watercourses and ponds are typical of the northern sites. Ditches and watercourses are typical of the southern most sites. Protected species have previously been recorded in the vicinity of each of the broad locations.

This means that in order to progress with any site it will be necessary to target more specific areas for potential development, considering in more detail the individual ecological constraints. Furthermore, ecological surveys will be required to assess the appropriateness and scale/design of development.

In any development site it will be necessary to retain and protect ecological landscape features such as hedges, woodlands, ponds and watercourses. Furthermore, in line with PPS 9 it will be necessary for developments to enhance and create ecological habitat links, corridors and networks with existing features. Major development in any of these areas will put pressure from human disturbance and hydrological impacts on existing habitats, particularly habitats such as ancient and ghyll woodlands. Particularly relevant around Hailsham will be the cumulative pressures from multiple existing developments and new development on such habitats. Most of the coastal sites have direct hydrological links with Pevensy Levels SSSI and must not cause water quality or other impacts on this designated site.

Requirements

We require the following to be taken into account when selecting sites and developing plans within the LDF:

1) *Ecological Surveys*

At any potential development site we will expect to see results of detailed ecological surveys undertaken at an appropriate time of year by a suitably qualified and approved ecologist (preferably Institute of Ecological and Environmental Management affiliated). Surveys should include 1) Phase 1 habitat surveys and 2) protected species surveys. Such ecological surveys should be used to determine the appropriateness of development and inform the design of any development appropriate to any existing ecological site features and particularly at the planning application stage.

2) *Protection of watercourses*

At any proposed site, we would request that a buffer strip (minimum 5 metres on any ordinary watercourse/waterbody and minimum of 8 metres on any main river) is maintained between the bank of any wetland/watercourse and any development or works. This is in order to maintain a functioning wildlife river corridor/wetland habitat for ecological, amenity and aesthetic reasons.

Any works should be carried out sensitively, and for any site development that results in a loss of wetland habitat, we would expect species mitigation and compensation for habitat loss.

In our remit to protect and enhance watercourses we would object to the loss of any length of watercourse, without at least like-for-like compensation. We would be concerned about the overall loss of wetland habitats and species, and the detrimental implications for local biodiversity.

We are also generally opposed in principle to the culverting of watercourses because of the adverse ecological, flood defence and other effects that are likely to arise. No installation of new culverts within any watercourse on site should be considered unless there is no practical alternative or an existing culvert is being replaced like-for-like in the existing location. Opportunities should be sought to remove existing culverts and convert to open watercourses where practicable.

3) *Enhancements*

LDF policies should seek opportunity for ecological enhancements should be an intrinsic part of plans. This is in keeping with PPS1 'Delivering sustainable development', PPS9: Biodiversity and Geological Conservation and the Draft South East Plan. Policy NRM4 of the Draft South East Plan seeks to avoid a net loss of biodiversity and to actively pursue opportunities to achieve a net gain of biodiversity across the region.

4) *Sustainable Drainage Systems (SuDS)*

Policies should be included within the LDF, which seek the inclusion of SuDS) Provision of ecological enhancements through the use of SUDS is encouraged. Drainage methods may include surface water fed features such as swales (wide grassed ditches), wet balancing ponds incorporating reedbeds, and wetland areas which will help to store and clean surface water. These can also be designed as beneficial wildlife, amenity and landscape features as part of an open space or a landscaping scheme for a development.

We actively promote the use of sustainable drainage techniques for the regulation and remediation of surface water run-off and to mitigate the loss of natural drainage patterns. We would therefore recommend that, if ground conditions are suitable, developments should consider these alternatives to more traditional drainage methods.

5) *Protected areas*

We are particularly concerned with wetland areas and protected habitats. Some areas in Wealden District are within/adjacent to a protected area (SNCI, SSSI, Ramsar site, SAC or SPA) and will therefore be unsuitable if the development will result in any disturbance/loss of the protected area. In these cases, assessments of the impacts of any development on adjacent or nearby protected areas will be required to inform the appropriateness of development. If development is to occur, extensive buffer areas will be expected between any development and any protected area, and enhancements will be sought as part of the development.

6) *Protected species*

We are particularly concerned with wetland areas and associated species. Species of particular interest and within our remit include water voles, crayfish, otters, and amphibians. Further information about species present may be available from the Sussex Biological Records Centre. Rare or protected species would require protection throughout development, and habitat enhancement for these species would be welcomed.

Broad area specific comments are below, though not all inclusive as the locations and extents of sites for comment are not clearly defined:

Sussex Coastal Towns Sub Area	
1	Cuckmere River Floodplain; ancient woodland; SNCI; watercourses; protected species
2	Pevensey Hurst Haven; protected species; woodland and ponds; ancient woodland
3	Protected species; Harebeating stream; ponds and woodland
4	Ponds and ditches; saltmarsh sewer river
5	Woodland; ponds; streams
6	Protected species; ponds; ditches and streams
7	Diplocks Wood SNCI; Folkington Reservoir SSSI; Protected species;
8	Wilmington Downs SSSI; Streams and Ponds; Woodland
9	Rattle stream and ditches; ponds; protected species
10	Watercourses and ditches; protected species
Rest of Wealden	
1	This site actually falls within our Kent area and we will be in a position to consult wider on this and provide further details at later stages of your LDF process.
2	As above
3	Crowborough Common SNCI; protected species; woodland; ancient/ghyll woodland; watercourses and ponds; In vicinity of Ashdown Forest SSSI SAC & SPA
4	As above in 1 and 2
5	Ancient/ghyll woodland; watercourses; main river; ponds; SNCIs and protected species. Have been concerned previously over proposals to develop the downlands farm site.
6	Ancient/ghyll woodland; ponds and streams; protected species; River Uck; woodland.
7	Ponds; woodland; ancient woodland; protected species; Ridgewood Stream
8	Ponds; protected species; streams; ancient woodland; Ridgewood Clay Pit SNCI
9	Ancient woodland; Framfield stream; pond and streams; protected species
10	Ancient/ghyll woodland; wet woodland; ponds; watercourses; protected species
11	As above in 1 and 2
12	Ghyll/ancient woodland; ponds and watercourses; protected species; Sapperton meadows SSSI

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Groundwater & Contaminated Land Concerns

Sites 1, 2, 3, 4, 5 & 6

These sites are all in areas of non/minor aquifer therefore the concerns regarding groundwater will be minimal. Contamination should be dealt with if and when it arises in order to protect local surface and groundwater resources.

Sites 7 & 8

Both of these sites are close or on a thin strip of major aquifer. There are potentially more issues associated with these. Historic pollution/contamination will have to be looked at depending on the scale and size of the proposed allocations or development proposals.

Sites 9 and 10

These sites are located on a minor aquifer with a shallow water table and are therefore sensitive to development.

Heathfield – Sites 10, 11 & 12

These sites are on a minor aquifer and there is potentially a shallow water table beneath. This must be protected as this area is likely to be sensitive to pollution and development.

Uckfield 5, 6, 7, 8, 9

These sites sit on Weald Clay, non/minor aquifer. There are also some Source Protection Zones in the vicinity. In terms of groundwater, this is moderately low in terms of sensitivity with regards to groundwater.

We hope the above comments are useful and appreciate the opportunity this early consultation provides us. With this in mind, we wish to meet with you to discuss our comments and future assistance in the preparation of this Core Strategy and other DPD documents within your LDF. I understand that Paul Smith has suggested a couple of dates to meet you and I look forward to hearing from you to confirm this.

Yours faithfully

Emma Winchester
Planning Liaison Technical Specialist

Direct dial 01903 703952

Direct fax 01903 215884

Direct e-mail emma.winchester@environment-agency.gov.uk

Cc: Paul Smith, Sussex Planning Liaison Team Leader

Letter to Wealden District Council from Environment Agency dated 5 June 2007

creating a better place



Mr Charles Lant
Chief Executive
Wealden District Council
Council Offices
Pine Grove
Crowborough
TN6 1DH

Our ref: L069
Your ref:

Date: 5 June 2007

Dear Charlie

Environment Agency announcement regarding Southern region

You may be aware that we have been looking at how the Environment Agency Southern Region achieves its objectives while providing the best value for money.

Our intended option, currently under review, is to merge our existing three areas, Kent, Sussex and Hampshire and the Isle of Wight into two operational areas. This would have Kent and East Sussex as one area and West Sussex and Hampshire and the Isle of Wight as the other.

Today The Argus newspaper in Brighton received an anonymous letter making a number of outrageous claims about our working practices. This letter is likely to appear in the paper tomorrow (Wednesday). We thought it only right to let you know in advance of the publication of the story so that you didn't hear it first from the local press.

The letter suggested that we would be closing our Sussex Area and diverting our funding away from operations in Sussex and towards "wealthy landowners" in Hampshire and developing the Thames Gateway on the North Kent coast. I would like to reassure you that this will not be the case. If the proposals are approved by our Board of Directors, we will reduce the layers of management and continue working to improve and protect the environment across the whole region.

A statement is attached which goes into a little more detail and may answer some of your questions. Of course, I am happy to discuss this with you.

As you may be aware I am leaving the Environment Agency to join East Sussex County Council, my last day with the Environment Agency will be 8 June. This means your point of contact for Sussex issues will change from Monday 11 June. We will not be recruiting a new Sussex Area Manager. As an interim measure James

Saxon House, Little High Street, Worthing, West Sussex, BN11 1DH.
Customer services line: 08708 506 506
Email: enquiries@environment-agency.gov.uk
www.environment-agency.gov.uk



Humphrys, currently Hampshire and Isle of Wight Area Manager, will head up West Sussex and Hampshire. Harvey Bradshaw, Kent Area Manager will head up East Sussex and Kent. Although the point of contact changes the telephone and correspondence details will remain the same for the time being.

If you have any queries relating to the above changes please contact me.

Yours sincerely



Rupert Clubb
Sussex Area Manager

Direct dial 01903 703905

Enc.

Environment Agency response to enquiries about structural changes

Howard Davidson, Regional Director for the Environment Agency said:

"The Environment Agency's Southern Region is made up of our Sussex, Kent and Hampshire and the Isle of Wight operating areas. The regional office takes a strategic view of environmental issues across the whole of the south of England.

"As a Government agency, we have a responsibility to tax-payers to spend their money wisely. We need to look at how we operate internally and whether our structures enable us to use as much of our money as possible towards protecting and improving the environment.

"Over the last few months, we have been investigating how we might move from a three area operation to a two area operation. This would mean that we could spend less money on layers of management and more on resolving environmental issues in Kent, Sussex, Hampshire and the Isle of Wight. We will be taking this proposal to our Board of Directors soon.

"If we do move to two areas, it will not effect our operations in Sussex or anywhere else. We will still have the same responsibilities to the environment and the local communities.

"Flood risk management is funded on a national basis from Defra through our head office. Money is allocated according to areas where there is the highest need. This will not be affected by any local restructure.

"We aim to avoid making any redundancies and we foresee that we will continue to operate from our current offices for at least the next five years. We are re-shaping the way we do our work so that some things can be done once nationally rather than separately in each area across the country. This will mean that we can divert our resources towards improving and protecting our environment.

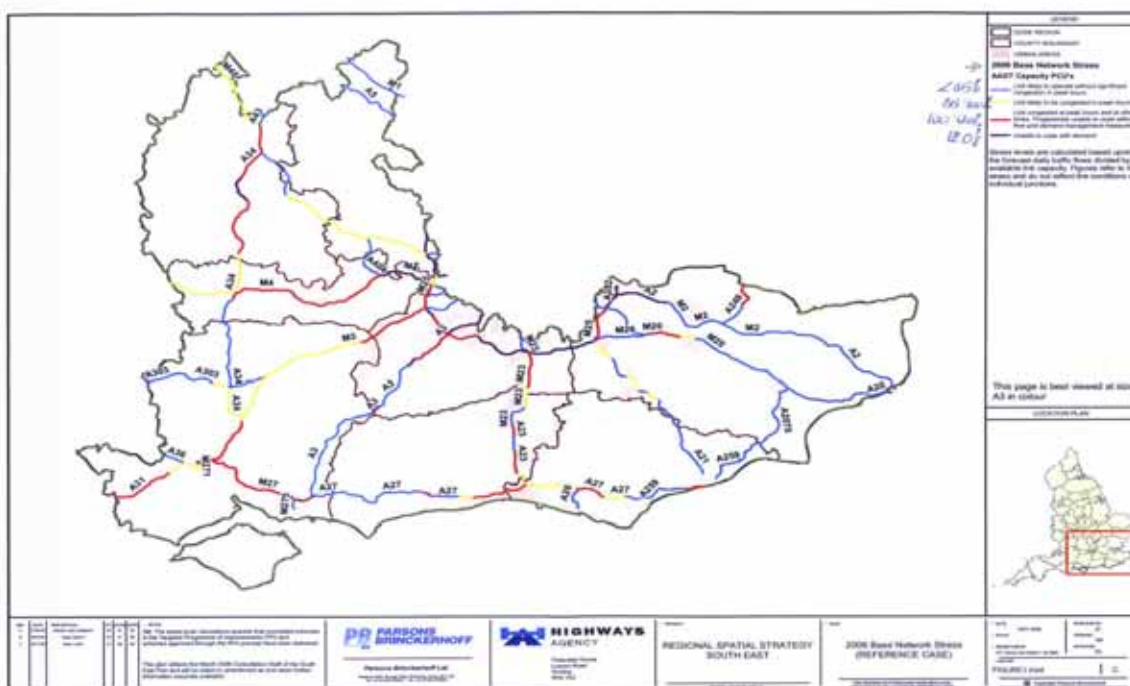
"We are incredibly proud of the work of our teams across the region. We have a workforce who are committed to the environment and it is their commitment and enthusiasm that has led environmental improvements in the south. There are fewer water pollution incidents than there were a few years ago and water quality in rivers and coastal waters is improving, wildlife sites are also improving and otter populations have increased."

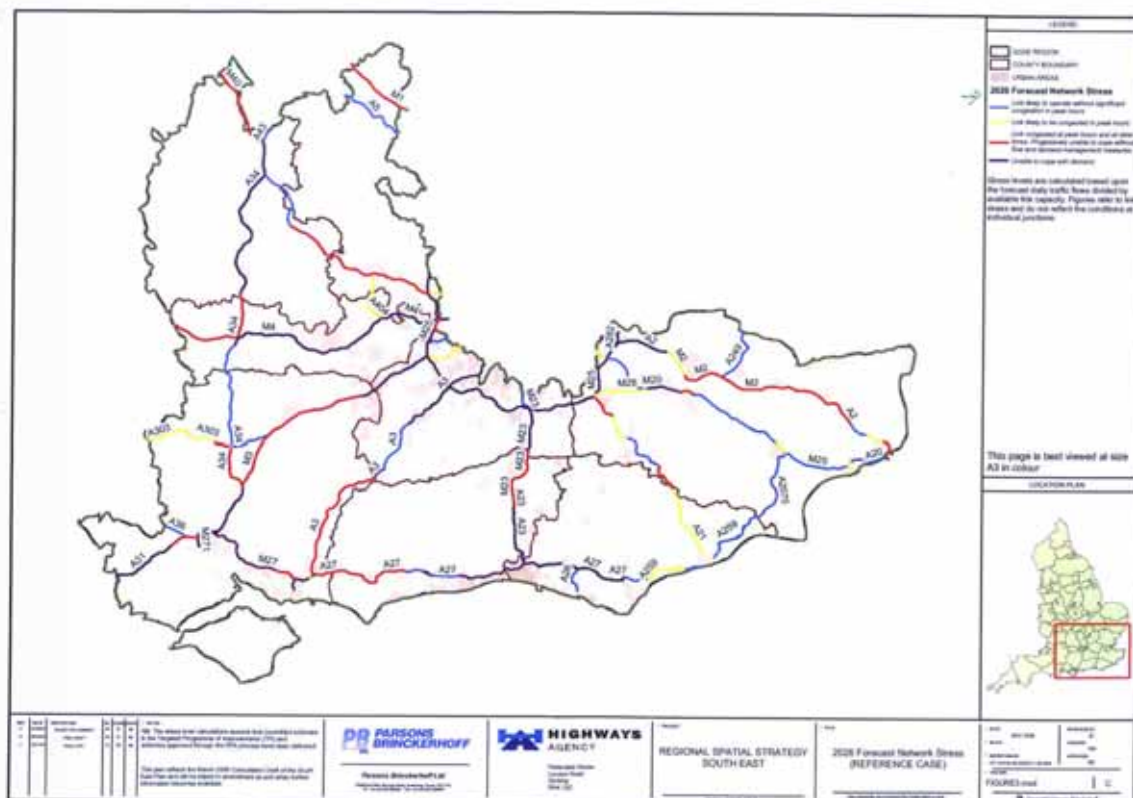
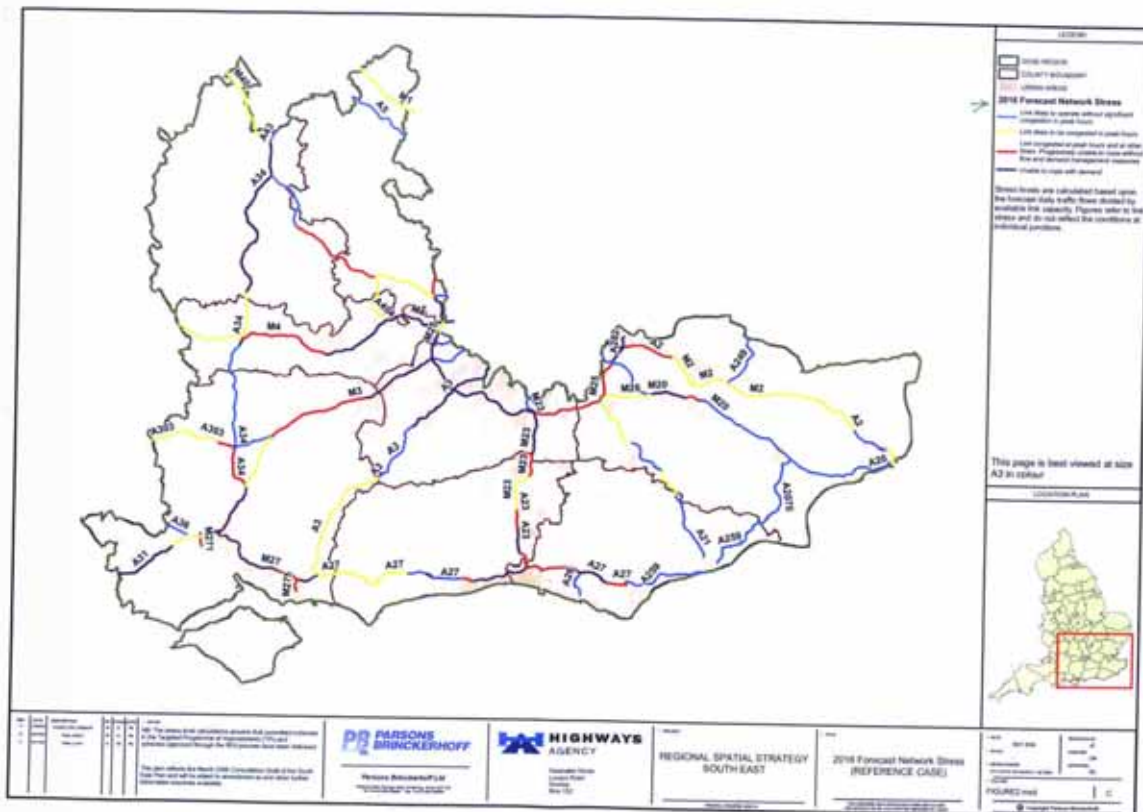
7.0 CONSULTATIONS WITH THE HIGHWAYS AGENCY

- 7.1 The Highways Agency is responsible for the planning and management of the A27 trunk road. The Highways Agency's responses to the Council's letter dated 19 February 2007 are reproduced below, together with Plans prepared for the Draft South East Plan Examination. It is however noted that a series of meetings with the Highways Agency has been taking place in parallel, however the full minutes of these meetings are not reproduced since they related to matters wider than the LDF.

Copies of Papers Presented to WDC by HA on 12 March 2007

Plans Submitted as Evidence to the Draft South East Plan Examination, showing potential implication so planned housing growth for the trunk road network.





Highway Agency's Response Dated 21 April 2007

HA RESPONSES TO GENERAL QUESTIONS APPLICABLE TO ALL SERVICE/INFRASTRUCTURE PROVIDERS:

Assisting Understanding of Remit, Current Plan and Future Investment Strategies

1. Statutory duty in providing relevant service and description of how this happens:

The Highways Agency is responsible for operating, maintaining and improving the Strategic Road Network (SRN) in England on behalf of the Secretary of State for Transport. The Agency's aim is to provide safe roads, reliable journeys and informed travellers.

We aim to ensure that development is planned so as to cause minimum impact on the SRN and to ensure that where there will be an impact this can be mitigated thereby ensuring that proposals are deliverable once their impact has been mitigated.

2. Do you/can you require developer contributions towards the cost of providing your service/infrastructure?

Developers will be required to mitigate any impact their development may have on the SRN. Where this requires physical improvements to the network (either junctions or links) the Agency would expect developers to fund this work. In addition, where a group of developments impact on the SRN at the same point then contributions from each of the developments to the improvement would be needed.

The Highways Agency may gain developer contributions through section 278 agreements or through section 106 agreements.

A section 278 agreement is essentially a financial mechanism; it is not a contract to carry out works. A developer may enter into a section 278 agreement with the Secretary of State (Highways Agency) for works to the SRN. However, the Agency can only enter a section 278 agreement with one developer. Where there is group of developments involved contributions would need to be collected under a section 106 agreement. However, the section 106 power does not extend to the Secretary of State; therefore the Highways Agency relies on section 106 agreements with LPAs.

3. What forward planning do you undertake in assessing the future demands for your service? What timescales are you looking ahead to?

The Highways Agency constructs major improvements (over £5m) and small scale improvements (under £5m). All major improvements require Ministerial approval. The Government's programme of major improvements has been informed by a series of multi-modal studies; in the case of Wealden this is the South Coast Multi-modal study, the only scheme identified in the study within Wealden is the A27 Wilmington Bypass. You will be aware of the circumstances around this scheme, in particular that the Regional Transport Board has identified the scheme for delivery late in the period 2011-16. If studies show that the scheme is needed earlier alternative funding sources (principally developer contributions) would need to be found.

Beyond those schemes identified in the multi-modal studies the Agency is able to identify further schemes as necessary. As you will be aware the Agency has undertaken significant analysis based on the housing provisions required in the South East plan. This has highlighted areas of high network stress. There is

limited funding for road improvements and their assessment. Therefore, much of the assessment work and improvements will require developer contributions.

The Agency is generally looking ahead to 2026 – the period covered by the South East Regional Spatial Strategy but occasionally, when needed, looks beyond this date.

4. How are you responding to the changes likely as a result of the policies of the South East Plan? What is the key driver in your own forward planning process?

As part of our participation in the RSS process, the Agency highlighted the issues resulting from the current state of the SRN and the likely impact of development upon it.

Our forward planning process is linked to our responsibility for operating, maintaining and improving the SRN.

The provision of new road infrastructure needs to be planned on the basis of what is practicable and affordable. It is Government transport policy, wherever possible, to look for alternatives to building new or improved roads.

5. What relevant plans, policies, and strategies in relation to the provision of your service should we have regard to in producing our LDF?

You should consider the policies in PPG13 and Circular 2/2007 which has replaced Circular 4/2001. For larger sites you will need to take account of the new Guidance on Transport Assessments produced by the Department for Transport.

The Agency also has congestion, journey time reliability and environmental targets together with a Targeted Programme of Improvements. Please see the Highways Agency's recently published 2007-08 Business Plan, in particular Annex C, at:

http://www.highways.gov.uk/aboutus/documents/HA_Business_Plan_07-08_WFV.pdf

Sharing/creating an Evidence Base to justify policies and spatial development options in our LDF

6. What are a) the key issues for your service, to be addressed in Wealden's LDF and b) what evidence do you have to support this view?

a) Minimise the impact of developments on the trunk roads by reducing the need to travel where possible by careful planning, and by provision of alternative modes and by locating development in sustainable locations and by balancing housing and employment.

b) See targets and policies as set out in answer 5 above and the Stress Maps provided to the RSS Panel. The Agency also has the outputs from the assessments which provided information on existing and predicted conditions on the SRN.

7. In terms of your service, are there particular issues and challenges which are distinctive to Wealden which warrant a special response?

In general the HA would be concerned about any development that is to be located close to the junctions of the trunk roads, as these are likely to result in larger numbers of trips using the already congested network.

You will be aware of the issues around the A27 Wilmington Bypass and the Folkington Link section of this improvement. In essence the scheme will address current problems at Cophall Roundabout and the Lewes Road traffic signalled junction and will facilitate the delivery of development at Polegate and Hailsham. You will be aware that the Regional Transport Board has identified this scheme for delivery in the later part of the period 2011-16. However, there is a possibility of developer funding delivering this scheme earlier. In the event that it is not delivered early interim improvements to the junctions on the A27 around Polegate would enable some development to be delivered. The current study, although running late, will inform your LDF on these matters.

8. Have you undertaken any recent consultation or research, the results of which need to be addressed on our LDF?

The HA has undertaken assessment of the SRN in preparation for the SE plan examination. Stress maps for the SRN have been produced.

As noted above, the current study includes updating the Highways Agency's Polegate traffic model. This will supply information and evidence to support your LDF proposals.

9. Can you provide catchment plans relevant to your service as they apply to Wealden? Eg GP catchments, drainage catchments, school catchments?

An appropriate means of assessing the distribution of trips from new development onto the SRN would be to use 2001 Travel to Work Census data. The proportions of trips to and from locations can be calculated and an estimate of their assignment can be undertaken. This would give an indication of the impact of developments on the SRN.

The table below outlines the percentages of trips made by people who live in the Wealden district that might be expected to travel to each of the destinations to work.

Destination	Percentage
Internal	65%
Eastbourne	9%
Tunbridge Wells	5%
Lewes	4%
Mid Sussex	3%
Crawley	3%
Brighton and Hove	2%
Rother	2%
Tonbridge and Malling	1%

While this is the travel pattern from 2001 we would expect the developments within your LDF to reduce the level of out-commuting by, for example, balancing housing and with employment provision.

Helping Us to Support Your Requirement through our LDF

10. In which areas of Wealden do you consider there to be a need for new and improved facilities (for your service) irrespective of future development issues. For example, deficiencies with existing premises or expansion requirements to address existing shortfalls

Please see the response to question 7 in relation to the A27 Wilmington Bypass/Folkington Link.

In addition we would look to your LDF to provide policies to increase sustainable travel and reduce car-based travel.

11. In what way are current shortfalls being addressed? Is there a role for the LDF in seeking to assist implementation? Eg Identification of a site. How is it being funded?

Please see the response to question 7 in relation to the A27 Wilmington Bypass/Folkington Link.

12. Have you identified particular deficiencies in you service area in meeting the anticipated future needs and what action is being taken to address these?

Please see the response to question 7 in relation to the A27 Wilmington Bypass/Folkington Link.

Transport (general) and Public Transport Services

The Highways Agency's responses to the questions under these headings are dealt with in our answers to the General Questions above.

Further Comments Submitted to Wealden District Council by the Highway Agency's Consultants PB, dated 1 June 2007

HA position lines for Wealden

1. The HA has identified a need for localised improvements to the A22 and A27 to the west of Polegate. The need for these improvements has been shown to be related to the housing development allocated to Polegate and Hailsham in the Joint Transport Study. Although the scheme may be funded from the Regional Funding Allocation, the HA acknowledges that a developer funded scheme is more likely to come forward before Regional funding.
2. The HA are currently considering a single carriageway standard improvement west of Polegate which is consistent with the route standard from Polegate to Lewes, but cannot confirm that this would be our recommended solution until the completion of the current testing. This testing is currently underway and it is anticipated that a preferred solution will be identified in the near future.
3. The HA proposes to retain an at-grade roundabout at Cophall, although its final form will be determined by junction capacity tests. Grade separation will be considered if there are no at-grade junctions designs that provide sufficient capacity, however, such schemes will be assessed against the appropriate environmental and cost appraisal.
4. The HA identifies that development at Hailsham will have a lesser impact on the Trunk Road Network than development at Polegate, but recognises that Polegate has the greater opportunity for sustainable travel.

5. Air Quality Management and safety issues will be of overriding importance to HA in deciding whether development locations are viable.
6. The HA will not support direct access off the trunk road for development sites.
7. The HA would be looking to the Wealden LDF to include policies aimed at reducing the level of commuting in and out of the district by balancing housing and employment and matching skills to employers.
8. The HA would be looking to the Wealden LDF to provide and encourage sustainable travel for both new and existing development.

8.0 WEALDEN LOCAL STRATEGIC PARTNERSHIP

16 July - consensus view



Wealden Local Strategic Partnership
c/o Policy & Review
Wealden District Council
Vicarage Lane
Hailsham BN27 2AX

David Phillips
Head of Planning Policy and Environment
Wealden District Council
Pine Grove
Crowborough TN6 1DH

25th May 2007

Dear David

LSP early engagement feedback on emerging LDF Core Strategy Issues and Options

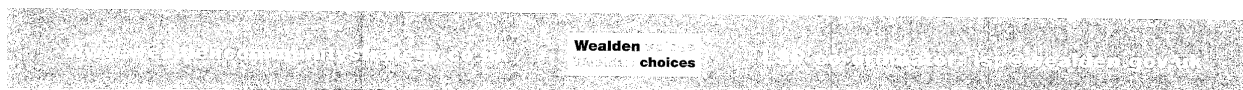
Many thanks for the support and involvement of your Planning Policy Team over the past months as we have been starting to get to grips with what the new Local Development Framework really means for Wealden.

As you know, for many of the partners around the LSP table, Planning is a new and uncharted territory, especially in this new, more integrated format. The process of revising our Community Strategy last year with our new, broader membership profile has enabled the LSP to begin to develop views as a body in its own right, and the LDF process provides us with a stimulating challenge.

At the last LSP meeting on 16th May, we had a most interesting and varied discussion around emerging key development issues for the Wealden Local Development Framework. We have analysed the views and ideas expressed by Board members at that meeting, and I should like to share the outcomes of this early engagement with you in the attached report. Please feel free to use this to feed into any ongoing discussions or committee proceedings if this would be helpful. If there are any points you would particularly like to discuss, do please get in touch.

Yours sincerely,


PP Ian Chisnall
Chair



LDF Issues and Options – LSP early engagement position

At the most recent meeting of the Wealden Local Strategic Partnership, 16th May 2007, partners discussed a range of key issues relating to the forthcoming LDF Core Strategy Issues and Options consultation paper. This discussion was facilitated by members of the Wealden District Council Planning Policy Team, and the supporting notes they provided appear at Appendix 1.

Part A below gives a summary of LSP partner views insofar as a consensus was discernable from the analysis of responses shown in Part B. A 'Scorecard' (see Appendix 2) was devised to capture individual partner views anonymously to allow an even-handed aggregation of the preferences expressed.

A Overview of LSP early engagement views on development strategies for Wealden

1. Urban / Rural Split

The consensus for the rural areas was generally to focus on villages with greatest potential to accommodate growth.

There was recognition of the need for affordable housing, but preferences were expressed by some for an 'exception site' approach and allocated sites rather than a percentage of any development.

2. Sussex Coast Sub-region

There was little solid consensus here, although there was some weighting in favour of including Hailsham in plans for growth in addition to Polegate & Willingdon. Comments suggested that there were other, more balanced options which should be considered. This would suggest a tendency towards the 'triangle' approach in this area, but members expressed a need for more information before taking a clear position on development potential in this area.

3. Rest of Wealden

There was a slightly greater preference for focusing development around the Uckfield area, particularly in relation to its rail links and the potential to encourage the reinstatement of the Lewes – Uckfield rail link.

However, there was a significant view that the complexities of the constraints to development around Uckfield mitigated in favour of more balanced dispersal, to meet needs in Heathfield and Crowborough as well.

Conclusion

Partners noted that outcomes awaited from the Employment Land Review might give some stronger evidence of likely future needs. Overall, partners felt that development should respond to need, whilst respecting the existing character of settlements to maintain social cohesion / social fabric of the community. Growth should also make best use of existing facilities and infrastructure, given the uncertainty of securing funding / agreement for significant new infrastructure development

B Analysis of LSP Board early engagement views

1. Development Strategy – Urban / Rural Split

	Summary	Preferences	
		Points (max 90)	% of possible points
1	Restrictive approach to rural development	11	12%
2	Increase growth in rural areas	17	19%
3	Focus on villages with greatest potential to accommodate growth	62	69%

Comments

Restrict rural development

This is ease v need.

Increase growth in rural areas

As long as this focuses on the provision of affordable housing, as this is the gap in rural areas in terms of needs as opposed to demand.

Focus on villages with potential

Could be expanded to reflect a more 'risk'-based approach balancing need and benefit. Risk to the community of not having a certain development.

Appears to offer a more flexible approach with ability to accommodate elements of other choices.

The 'devil is always in the detail'. On face value this is the most sustainable option in my view.

My choice from these three is option 3, but only from the point of view of ease of delivery. 'Need' is all-important.

If there is potential for growth, people, groups etc will feel more able to accept growth and development.

Where there are existing facilities in a village, some extra growth should ensure long term viability. Very dispersed growth probably doesn't ensure viability of anything.

Criteria for growth

Ability to accommodate growth should be linked to public transport / rail routes. Improved infrastructure may just be a hope – we may have to manage with what we have for decades.

Important to recognise that one of the highest benefits identified by Wealden residents in the Community Strategy Survey was quality of life. Therefore should seek to enlarge existing infrastructure rather than diversifying broadly where adequate infrastructure is unlikely ever to be achieved.

Growth in areas with greatest services currently present is most desirable eg transport, education, policing and social services.

Vital to identify mechanisms for measuring sustainability of villages and allocate housing with this in mind, rather than on simply the potential to accommodate growth.

Not necessarily *no* development at all, but development within AONBs should be small-scale and necessary to meet local socio-economic needs within those areas (PPS7). Outside AONBs, option 3 would probably be preferable.

Not really sure that the idea of a few houses here and there supporting schools and services, and encouraging a new public transport service really works. Evidence for the former Countryside Agency demonstrated that people tend to drive to a wider area regardless of what facilities and services there are available on their doorstep. Also, the critical mass for a new shop is quite high!

Affordable housing

Getting affordable housing into areas that need it most rather than as a percentage of developments wherever they are.

Affordable housing should be through exception sites and sites allocated specifically for affordable housing rather than allowing market housing simply to gain a %age of affordable housing.

Maximising exception sites where needs evidenced for affordable housing.

2. Development Strategy – Sussex Coast Sub-region

	Summary	Preferences	
		Points (max 45)	% of possible points
1	Focus development of Polegate / Willingdon	14.5	32%
2	Also plan for the Hailsham to grow	24.5	54%

Comments

Polegate

Preference to Polegate over Hailsham because of rail link, proximity to Eastbourne with established services. Could offer the type of rail link that exists between Cardiff and Valley towns to the north.

Option 1 will decrease the boundaries and help Polegate and Willingdon to feel less isolation; ties in with development and funding along coastal strip.

Focus on Polegate / Willingdon, but please try and save the strategic gap between Polegate and Hailsham.

Hailsham

In terms of equality, Hailsham development would appear appropriate.

During discussion the point was made that we must ensure Polegate / Willingdon and Hailsham do not join up – this is very valid and important. On balance, option 3, but with care.

Keen to see Hailsham enabled to regenerate.

Hailsham has a very vital town centre and good employment land provision, and therefore should have some steady growth.

'Triangle' approach

Hailsham / Polegate / Willingdon triangle approach for regeneration. Hailsham's proximity to Polegate and Willingdon mean it is not sensible to exclude it.

Development in both areas required. Hailsham not to be excluded.

Again, the devil is in the detail. A balance between both options is probably the most sustainable option. I feel that I need information to help me make this decision. I suspect growth in both areas would be possible, with more development / bigger % of homes in Polegate / Willingdon.

Any development proposed at Polegate / Willingdon should not impact adversely on the Sussex Downs AONB. What is the capacity of Eastbourne's transport infrastructure to handle more travel to work from outside Eastbourne to the town movements? Wouldn't a better strategy be to develop services and employment opportunities in Polegate / Hailsham etc to 'siphon off' potential excessive traffic journeys to Eastbourne? Or are there many unfilled jobs in Eastbourne??

Other

Difficult – too many unknowns and variables.

Neither option is particularly attractive. Both areas have considerable constraints. The option of a new settlement or extension of other service centres should not be excluded.

Uplift in residents should centre on areas where permanent service provision is viable.

3. Development Strategy – Rest of Wealden

	Summary	Preferences	
		Points (max 45)	% of possible points
1	Focus development around Uckfield	23	51%
2	More balanced dispersal	19	42%

Comments

Uckfield

For the reason of transport / rail links, preference for Uckfield area development. Good access to A22.

There appears on balance to be a demonstration that Uckfield requires growth to allow necessary regeneration for town and build on critical mass for education and other vital services.

This might help the future of the Uckfield railway and encourage opening of the Lewes – Uckfield link, and ultimately Brighton – Tonbridge.

I see the benefit of building substantially in the Uckfield area if done well.

Focusing development around Uckfield could provide a good balance between social, environment and economic considerations. Environment Agency should be involved at the early stages!

More balanced dispersal

Crowborough is hard to reach and has a lack of services within the voluntary and community sector; more development needed for Heathfield and Crowborough will be good for regeneration.

The topography and road structure of Uckfield makes it very difficult to focus major development around it, although some development in the area should not be dismissed. Might need to 'bus' pupils from Uckfield to Crowborough.

On balance prefer more balanced dispersal, but recognise need for development in Uckfield.

Again, development centred on one town with infrastructure constraints will exacerbate an already difficult position.

Other

The Employment Land Review may give some real indication of future needs.

Unfamiliar with the rest of Wealden but pattern / location should be sustainable, not only in terms of minimising vehicle movements but also in terms of conserving landscape, amenity, quality of life etc.

More development to allow better services.

Other comments

Concern that no growth in any particular settlement should not destroy social cohesion or the social fabric of the settlement.

Appendix 1 Discussion notes provided by WDC Planning Policy Team

LSP Board Meeting 17 May 2007

LDF Issues and Options Consultation

The following are alternative options in respect of development strategies which could be adopted within the LDF:

Development Strategy – Urban/Rural split

- 1) Should we take a restrictive approach to development in rural areas/villages to protect the landscape and character of these areas?
- 2) Alternatively should we substantially increase growth in rural areas in order to optimise provision of rural affordable housing?

- 3) The third option is to focus on those villages which have the greatest potential to accommodate growth. This potential could be judged in terms of the availability of services in the settlement and whether or not development would cause significant damage to the environment.

Development Strategy – Sussex Coast sub-region

- 1) Should we focus development in the Polegate/Willingdon area as these areas are in the closest proximity to Eastbourne (with its provision of employment and services) and thus this strategy could help to minimise the need to travel and the length of journeys?
- 2) Alternatively should we also plan for Hailsham to have some growth in order to encourage some regeneration and to support services in this area. This type of approach is supported by the fact that the A22 is less congested than the A27(T).

Development Strategy – Rest of Wealden

- 1) Should we focus development in and around Uckfield in order to provide a critical mass which would help to support the provision of new services and to provide funding to help solve congestion and flooding problems in the town? This would also mean that development could be directed away from the environmentally sensitive areas of Ashdown Forest and the High Weald Area of Outstanding Natural Beauty.
- 2) Alternatively should we plan for a more balanced dispersal with some growth in Crowborough, Heathfield and some of the villages with potential for growth? This would reflect the complex travel-to-work and other travel journey patterns between settlements in this area.

Appendix 2 Wealden LSP: LDF Issues and Options Consultation Scorecard

The options below relate to our discussions around the emerging LDF Issues and Options paper, please tick a box or boxes for the option(s) you prefer and write any comments you have in the space provided.

Development Strategy – Urban / Rural Split

	Summary	Preference	Please write any additional comments below
1	Restrictive approach to rural development		
2	Increase growth in rural areas		
3	Focus on villages with greatest potential to accommodate growth		

Development Strategy – Sussex Coast Sub-region

	Summary	Preference	Please write any additional comments below
1	Focus development on Polegate / Willingdon		
2	Also plan for Hailsham to grow		

Development Strategy – Rest of Wealden

	Summary	Preference	Please write any additional comments below
1	Focus development around Uckfield		
2			

Any other comments?

9.0 SOUTH EAST WATER

7 St Peter Street Winchester
Hampshire SO23 8BW

T 01962 877414
F 01962 877415/844968

W www.adamshendry.co.uk
E info@adamshendry.co.uk

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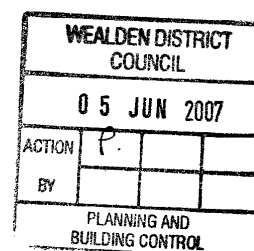
Our Ref: SEW/512/SE

Jacqueline Watson
Planning Policy Manager
Wealden District Council
Pine Grove
Crowborough
East Sussex
TN6 1DH

4 June 2007

Dear Ms Watson

**WEALDEN DISTRICT COUNCIL'S LOCAL DEVELOPMENT FRAMEWORK
CORE STRATEGY: EARLY ENGAGEMENT
SOUTH EAST WATER**



I am responding on behalf of South East Water to your letter dated 19 February 2007 (but received in March 2007). South East Water very much welcomes the opportunity to input into the Core Strategy. I apologise for the delay in responding, but in the intervening period David Spiller, South East Water's water resource manager, has moved elsewhere and this has coincided with an exceptionally busy time for the Company.

The Company's overall position is that it would like to see much greater acknowledgement of water supply issues in the statutory development plan. This should start with clear regional policies that support the provision of the water resource infrastructure required to achieve higher environmental standards and serve population growth. Representations to this effect were made to the recent South East Plan EiP, which devoted time to considering the issue and its relationship with sustainability and intended growth.

A modified RSS is, we understand, due to be published for consultation in late September. If South East Water's views are taken on board, this would result, at least, in strategic allocations of land for reservoirs at Clay Hill (within Lewes District but close to the Wealden border) and elsewhere in other water companies' areas, as proposals of RSS. The schemes mentioned in the relevant policy in submitted RSS (NRM2) are those identified in current water company resource plans. Along with research undertaken by the Environment Agency for the Assembly, to which the water companies contributed, the evidence base provided by water resource plans is the best currently available and therefore should be used to plan future infrastructure provision.

However, it will also be necessary to allow for uncertainties in forecasting the water demand-supply balance. Relevant matters to be taken into account in this respect include:

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- the final requirements of the Habitats Directive (the EA are currently reviewing existing consents for abstraction and discharge);
- assumptions made about climate change;
- the EA's Restoring Sustainable Abstraction Programme;
- the preparation and implementation of Catchment Abstraction Management Strategies, and
- implementation of the Water Framework Directive (River Basin Management Plans).

These matters cover complex issues, whose resolution is likely to result in overall reductions in the water resources currently available to be deployed to public supply in the South East. Proposals in RSS and LDDs relating to water supply infrastructure therefore need to be both clearly supportive of proposals to implement new schemes (to ensure that the necessary infrastructure is put in place in good time) and also sufficiently flexible to accommodate the uncertainties that may be associated with future reductions in resource availability.

Water resource planning is undertaken under the Water Act 2003 and relates to different timescales and areas to those used in spatial and land-use planning. Local Authority boundaries are rarely of relevance. Statutory water companies, South East Water included, are currently progressing detailed technical, planning and environmental studies of the water supply options currently identified in draft RSS Policy NRM2, together with a series of additional and/or alternative options for securing public water supply. South East Water has been granted funding by Ofwat to investigate the feasibility of the Clay Hill scheme against other options. This feasibility work should be completed by the end of 2007.

When completed, the study of Clay Hill, and the wider appraisal of water resource options being undertaken by South East Water and the other water companies, will form the basis for individual proposals to be progressed through future Water Resource Management Plans submitted to OFWAT for funding approval. Many of these schemes will require planning consent. Hence the need for coherent planning policy context in RSS and LDDs.

It is anticipated that the outcomes of both the demand-supply studies and the current studies of Clay Hill will be more fully understood by the end of 2007. Consultation on the draft Water Resources Plan is due to take place in early 2008. Until these tasks have been completed, South East Water cannot specify what new strategic water resources will be required within Wealden District.

You will gather from the above that although details of what infrastructure may be required in Wealden are as yet uncertain, the Core Strategy should acknowledge that the District needs to plan for water resource development, a requirement that it shares with surrounding Districts. The Strategy should recognise the potential role that the District might play in the development of new water resources, for example in the Lower Ouse catchment. As RSS progresses to approval, the Strategy will need to take account of any strengthened regional policies supporting water resource development. Finally, the Strategy needs to be flexible, so that as the results of the detailed studies and water resource planning emerge, there is a strong commitment to allocate land for schemes which can be justified after a robust and thorough analysis.

As requested we have provided some preliminary information in the attached schedule which we trust will be useful to you. We would be more than happy to discuss further and provide clarification as you see fit.

Yours sincerely



Suzanne Ellis
Principal Planner

QUESTIONS FOR SERVICE/INFRASTRUCTURE PROVIDERS

Assisting Our Understanding of Your Remit, Current Plans and Future Investment Strategies

South East Water is a statutory undertaker and is responsible for supplying water to an area of some 3607km² of Kent, Sussex, Surrey, Berkshire and Hampshire in two discrete regions (Appendix 1). The company supplies on average 390 million litres of water a day to 1.4 million customers. For resource planning purposes the Company is split into five Resource Zones, two in the Northern Region and three in the Southern Region.

In terms of developer contributions, South East Water will evaluate each site on an individual basis where an application for water supply is made from a developer. Where identified, developer contributions will be required for all off-site reinforcement to existing infrastructure.

South East Water, in common with all water companies, plans its water resources 25 years in advance. This 25-year-plan is under constant review and ensures South East Water can continue to meet its obligations to deliver safe, clean drinking water to all customers. It also takes into account factors such as the proposed house building in the south east, increased water usage and climate change.

The plan looks at three key ways of making more water available by:

- Making better use of existing resources
- Managing customers' demand for water
- Developing new resources

The current plan, the PR04 Final Water Resource Plan, was approved in 2003. A summary of the Plan is included as Appendix 2. Work has commenced to produce the PR09 Water Resource Plan. This plan for the first time will be statutory and will also be subject to Strategic Environmental Assessment. The timetable is expected to be as follows:

Draft Water Resource Plan submitted to DEFRA	-	End 2007
DEFRA review of draft Water Resource Plan	-	Jan – March 2008
Consultation	-	April – June 2008
Plan Revisions and Modelling	-	Mid 2008 – Early 2009
Final Water Resource Plan submitted to DEFRA	-	Mid 2009

As part of the water resource planning process the growth proposed by the South East Plan will be factored into the demand forecasts. In terms of South East Water's driver for its forward planning, it is required to provide a secure supply of water for its customers. As a consequence, new water resources along with water efficiency and management measures may be required.

Wealden District Council must have regard to the South East Plan in developing its LDF, especially where this calls for the development of new strategic water resources and supports

demand management measures, and the Company's Water Resource Plan, both existing and emerging. As set out in the covering letter, the following uncertainties also need to be recognised in terms of future water demand:

- the final requirements of the Habitats Directive (and the associated review of consents);
- climate change;
- the Environment Agency's Restoring Sustainable Abstraction Programme;
- the preparation and implementation of Catchment Abstraction Management Strategies; and
- the implementation of the Water Framework Directive (River Basin Management Plans).

Sharing/creating an Evidence Base to Justify Policies and Spatial Development Options in our LDF

The evidence base to justify policies is covered above and included within the Company's Water Resource Plans.

South East Water does not have any specific comments at this stage on the spatial options being considered but will do so when the options have been further defined and developed.

South East Water's supply area is shown in Appendix 1.

Helping us to Support your Requirements through our LDF

The current Water Resource Plan anticipates that there will be deficits in supply within its Southern Region by 2015/16, in particular within its Mid Sussex Resource Zone (RZ2) (see Appendix 1). This Resource Zone includes Uckfield and Crowborough. The 2004 Water Resource Plan identified water resource options to address this deficit, which included Clay Hill reservoir and desalination at Newhaven. The deficit predictions, along with the potential solutions, will be reviewed as part of the new Water Resources Plan. As already covered above, South East Water will be looking to LDFs to support and allocate sites for new water resource development. Policies that support water efficiency in new development would also be welcome.

Our Communications with You and the Council

Please contact Mrs G Cooper at South East Water in the first instance. Her email address is gcooper@southeastwater.co.uk.

South East Water would be happy to meet with the LDF team and participate in further discussions.

South East Water will be undertaking consultation on its emerging Water Resource Plans. Further information on how the company engages with its customers can be found on their website – www.southeastwater.co.uk.

Initial Consultation on Possible Development Locations Around Towns

South East Water does not have any specific comments to make on the location and distribution of development at this time. With the necessary planning policy support, allowing for the timely provision of water resources, then the company should be in a position to meet the demand arising from growth within the District.

Water Supply

1. A summary of the Water Resources Plan has been included within Appendix 2. The District is served by a combination of ground and surface water abstractions, a key resource being Arlington Reservoir to the west of Polegate. Water for the majority of the District is treated and distributed via Barcombe Water Treatment Works (WTW), located on the River Ouse to the north of Lewes. The northern part of the District is served by Groombridge WTW, located on the Kent/Sussex border.
2. Work has commenced on preparing the PR09 Water Resource Plan and details of the proposed methodology were sent to all District Councils within South East Water's Southern Region at the end of last year for comment. The process is prescribed by the Environment Agency's Water Resource Planning Guidelines (April 2007). Work is currently progressing on the following:
 - Identifying and defining the SEA/Sustainability criteria;
 - Identifying a long list of options across a range of supply and demand categories, including:
 - Surface water reservoirs – raising existing ones and new sites
 - River abstractions
 - Groundwater sources
 - Effluent reuse
 - Bulk transfers from other water companies in the region or further afield
 - Desalination
 - Demand management
 - Leakage control
 - Developing a tiered approach to the screening and short-listing of options - Initial Screening, Intermediate Screening and Final Appraisal ensuring that the decision-making process is fully documented and justified at every stage.

Questions 3 – 7

The key considerations in questions 3-7 appear to be:

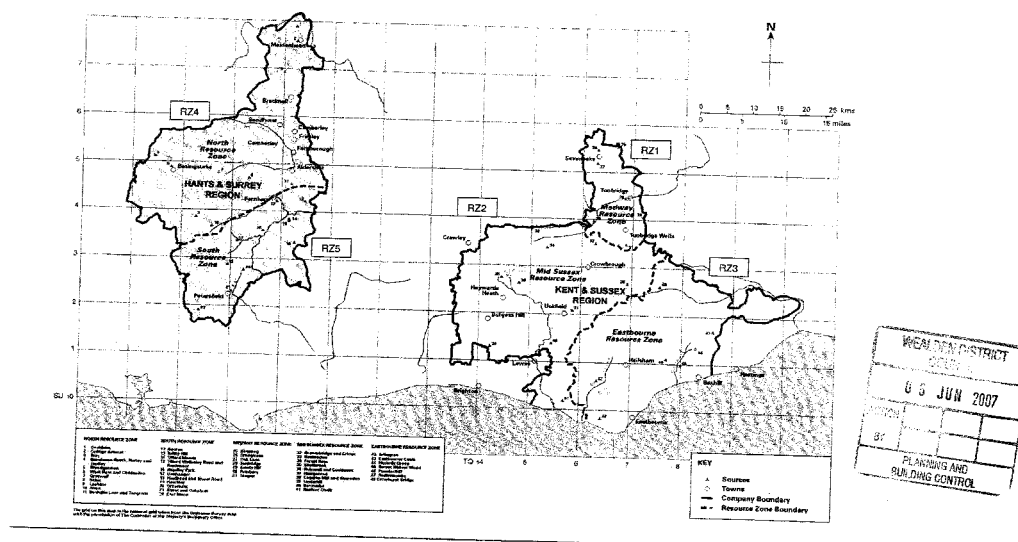
- are there any parts of the District that are more constrained in water supply terms than others?
- if there is a predicted deficit, what are the implications for growth in the District?

Firstly it should be understood that water planning is not undertaken on a District by District basis. Secondly, the majority of water resources are linked and it is possible for South East Water to move water around its region. It is therefore difficult within a District to say that one area is more constrained than another as for the most part it is within the control of South East Water to address any supply/demand disparities on a District level, provided overall that there is sufficient water within the supply network.

The current Water Resource Plan identifies a deficit by 2015/16 and this will be subject to review for the new Plan. If this is confirmed, then South East Water will seek to address this through a twin track approach of demand management measures and new resources. As you rightly point out, the feasibility of Clay Hill and a Desalination Plant at Newhaven are already being assessed. These options will be considered alongside others in the new Water Resource Plan and will be taken forward if these prove to be the most practicable and sustainable solutions. Other options may emerge and therefore planning policies must be sufficiently flexible to reflect this possibility. The lead in time for major resource schemes is significant and the planning system can present a significant hurdle. With policies supporting water resource development, South East Water will be in a better position to deliver the resources needed to support regional and district growth and sustainability objectives.

south east water

Appendix 1 South East Water Resource Zones

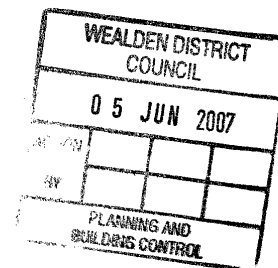


SOUTH EAST WATER

PRICE REVIEW 2004

WATER RESOURCES PLAN

April 2004



EXECUTIVE SUMMARY

This PR04 Final Water Resources Plan submission has been prepared in accordance with the Water Resources Planning Guideline issued by the Environment Agency (Agency) in February 2003 and updated in December 2003.

It is presented as the Company Preferred Scenario (CPS) for the management of the supply demand balance over the period to 2030 and is consistent with the Company's Final Business Plan submission. The outputs forecast in this plan can only be completed following appropriate funding as set out in the Final Business Plan.

A number of working meetings have been held between South East Water and the Agency during the preparation of the Draft and Final Water Resources Plan, which reflects South East Water's current supply demand balance and a least cost solution to the planning problem.

The Company continues to fully support the Environment Agency and Government's policy on a twin-track approach to water resource planning, that is undertaking demand management measures in conjunction with resource development.

Overview

South East Water covers an area of some 3607km² of Kent, Sussex, Surrey, Berkshire and Hampshire in two discrete regions (Figure 1). Last year we supplied on average 376 million litres of top quality drinking water a day to approximately 1.4 million customers.

For resources planning purposes the Company is split into five Resource Zones, two in the Northern Region and three in the Southern Region (Figure 2), consistent with the Agency's definition:

"The largest possible zone in which all resources, including external transfers, can be shared and hence the zone in which all customers experience the same risk of supply failure from a resource shortfall"

Progress to 2005

South East Water started the new millennium with a significant supply demand deficit in both its Northern and Southern Regions. Substantial in-roads into this deficit can be reported despite being funded only to maintain the balance, not remove the deficit, under the Ofwat methodology. The re-negotiation of the Ouse abstraction licence has provided a significant level of out-performance in this respect.

In the Southern Region our continued commitment to leakage reduction, as demonstrated in the latest results published by Ofwat, coupled with progress on a number of water resource projects including the Bewl-Darwell Transfer Scheme will make a significant impact on the supply demand balance. By the end of the regulatory year 2004-05 we forecast balance to target headroom in this region.

In the Northern Region our main focus has also been on leakage reduction and this has contributed to some of the largest percentage reductions reported in the industry. Abstraction from the Wey Springs borehole near Alton has ceased under the National Environment Programme as agreed in our 1999 Water Resources Plan. This has been achieved with no reduction to security of supply because of the significant reductions achieved in leakage.

The hot summer of 2003 produced some extreme peaks in demand for water and as a result the Company reviewed peak factors used in the calculation of the dry year and peak week scenarios. In both regions the demands experienced peaked within 5% of the forecast without surpassing it, which lends support to the demand forecasting assumptions. Although surface water supplies deteriorated rapidly, the year started with above average levels of groundwater supply and therefore the Company was able to meet demand despite being in a position of deficit.

The Post 2005 Environment

South East Water is committed to removing the remaining deficit in the Northern Region and maintaining the balance between supply and demand. This will involve addressing forecast growth in demand and meeting target headroom.

The Plan shows that headroom will be achieved in 2005-06 in the Southern Region and 2006-07 in the Northern Region.

Demand Forecasting

South East Water has carried out a considerable amount of work reviewing its demand forecast. The Company has joined Mid Kent Water, Southern Water, and Folkestone and Dover Water in contracting Experian Business Strategies Ltd to provide new property/population forecasts. This forecast includes Census 2001 data, ensuring our Plan is as up-to-date as possible and further improving the Plan's robustness. With significant growth forecast in the south east it has been important to have a full understanding of where this growth is planned and to prepare to meet new demand accordingly.

From this forecast it is clear that further investment in the supply demand balance is essential if we are to continue to balance supply and demand and to meet our target headroom. In the Southern Region the investment driver continues to be dry year annual average demand whilst in the Northern Region there is both a dry year and a peak week investment driver. However, analysis has shown that peak week conditions should form the investment driver. We continue to adopt a twin track policy that involves demand management and resource development and this policy is reflected in our Plan.

Headroom

South East Water has adopted the new headroom calculation based upon the UKWIR report *"An Improved Methodology for Assessing Headroom"* (ref: No.02/WR/13/2 UKWIR, 2002). The report addresses the weaknesses of the old methodology and allows companies to present more realistic resources plans that reflect changing levels of uncertainty over time. The impact of this change has been a smaller headroom allowance in the short-term and slightly larger in the longer-term than those allowed in PR99.

Climate Change

The challenge of planning for the impact of climate change is something South East Water takes very seriously. The potential impacts on the supply demand balance are considerable and although the true impacts of change may not be truly evident for another couple of decades, it is important to examine and address the issues now.

Climate change will have a double impact on water companies. On the demand side it could result in higher summer peaks and higher annual average usage due to increased garden watering. On the supply side, longer drier summers may reduce the deployable output of our surface water sources and could impact on our groundwater resources, although this is currently less certain.

The Company has included an allowance in headroom for the impact on demand based on the DEFRA commissioned research entitled, *CC:DeW Climate Change and Demand for Water* (2003). The effect on supply has been based on the latest UKWIR research, *Effect of Climate Change on River Flows and Groundwater Recharge* (UKWIR, 2002), and applied to our "run of river" sources to provide a direct reduction to deployable output and also an allowance in headroom. The impact of climate change on groundwater sources is much more uncertain and thus we have chosen not to include any effect in our Plan.

Environmental Obligations

In line with the latest Agency guidance following the publication of Ministers' Guidance, no specific output reductions have been made for sustainability reductions in our Plan. This is because there is no specific and substantiated figure that has been determined against which to allow for. Guidance also prevents us from including for the uncertainty within headroom.

South East Water recognise the potential significance of upcoming environmental legislation and has included in its Business Plan the costs of investigating the various sites highlighted by the Agency as being potentially at risk.

The Company believes that the opportunity to align the deadlines of key environmental legislation and the Periodic Review process has been missed and that the wholesale use of the IDOK process to deal with forthcoming environmental objectives is unfortunate.

Leakage

Leakage detection and reduction has always been of key importance to South East Water as we operate in a recognised resource scarce area. The Company has continued to reduce our levels of leakage, achieving a 26% reduction since 1999 as reflected in Ofwat's *Security of Supply, Leakage and the Efficient use of water 2002-2003* report. Our objective is to ensure that these savings are maintained.

The cost of reducing leakage has been considerable and the re-assessment of our Economic Level of Leakage (ELL) carried out this year indicates that we are already operating below this level. However, given the political sensitivity surrounding leakage South East Water do not intend to allow leakage to rise from the agreed 2003-04 target.

Metering

In our 1999 Water Resources Plan it was anticipated that legislation would allow the continuation of compulsory metering. However changes to the legislation has effectively stopped the wide-scale compulsory metering of domestic properties.

Because of this, the Company has been unable to install meters at the rates set out in our 1999 Plan. Metering is more expensive under current legislation and the economics of metering are not an attractive alternative when compared to resource development and leakage reduction.

Despite this, South East Water continue to support metering as the fairest way to charge for usage habits. As well as continuing to provide meter free of charge to all those who opt for one, the Company has included a selective metering programme based on metering void properties with steady outputs over the planning horizon.

An application for water scarcity status has been carefully considered and since the submission of the Draft Business Plan sensitivity analysis has been carried out to establish the likely costs and benefits of a successful application.

Feedback from our customer research shows that customers believe that metering is the least favourable option when asked what type of solution would be most acceptable to maintain water reserves. Additionally the Company expects to achieve supply demand balance early in the PR04 period potentially questioning the outcome of an application for water resource scarce status. South East Water will keep this option under review and inform the Agency through annual resource plan updates of any changes in our views.

Regional Solution - RESPLAN

South East Water has worked with neighbouring water companies and the Environment Agency to develop further the 'RESPLAN' model, that used 1999 Plans to help identify the most appropriate regional solutions to the supply demand balance. The Company is pleased that in the main the results of this work reinforce the proposals presented by our own modelling work.

A number of potential future schemes highlighted by the modelling will be investigated further over the PR04 period, such as the possibility of a bulk transfer from Portsmouth Water. The study has helped refine the key strategic options for water resource development in the South East of England and South East Water remains committed to working with the Agency and neighbouring water companies to deliver the least cost planning solution to balancing supply and demand.

Resource Development

South East Water has constructed a least cost planning model that investigates combinations of potential schemes in order to find the least cost solution. Demand management and resource development schemes have been included in our studies and the outcomes set out in this plan reflect an optimal approach to water resources planning that is both least cost and takes into account the needs of our environment.

In our baseline scenario funding has been assumed to fulfil our obligations to offer free meter installations at a level of 3,500 installations per year. Also included in the baseline is the continuation a water efficiency strategy that raises the awareness of water as a limited resource.

In our Southern Region we have identified three schemes in addition to the existing planned schemes over the period to 2005 that satisfy the dry year annual average demand driver. These schemes are set out overleaf.

<i>Scheme</i>	<i>Average Yield (Ml/d)</i>	<i>Implementation Date</i>
Desalination	9.5	2006-07
Postern Park	3.63	2012-13
Clay Hill Reservoir	18	2015-16

The building of a desalination plant at Newhaven has been accepted as a part of the Early Start Programme.

In the Northern Region the following five schemes are identified as the least cost planning solution for the average day peak week demand driver.

<i>Scheme</i>	<i>Peak Yield (Ml/d)</i>	<i>Implementation Date</i>
Wey LGS Enhancement – Phase 1	9.57	2005-06
Maidenhead Chalk Enhancement – Phase 1	7.69	2006-07
Bray Stage II	23	2008-09
Wey LGS Enhancement – Phase 2	15.32	2017-18
Maidenhead Chalk Enhancement – Phase 2	6.61	2026-27

These are shown graphically in Figures 3 & 4.

Conclusion

South East Water has made significant progress with enhancing its water resource planning processes since the 1999 price review. A number new techniques identified in the *Economics of Balancing Supply and Demand* (EBSD) framework have been successfully adopted, to determine the least cost approach to balancing supply and demand.

The Company remains committed to providing a secure supply of water for our customers, taking into account the environment in which we operate. This Final Water Resources Plan, in support of our Periodic Review 2004 Business Plan, is based on sustainable economic and environmental principles.

Figure 1 South East Water Location Map

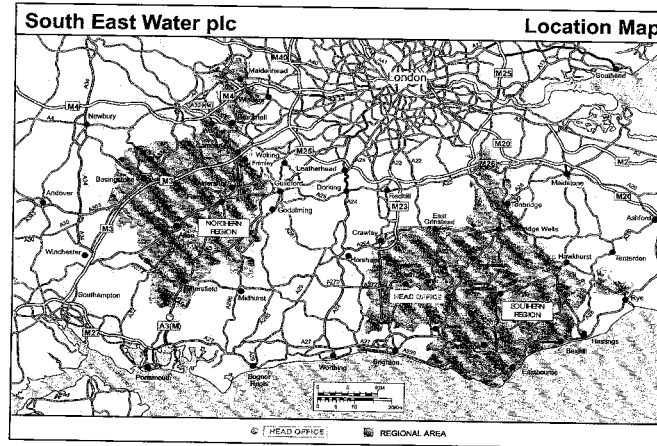
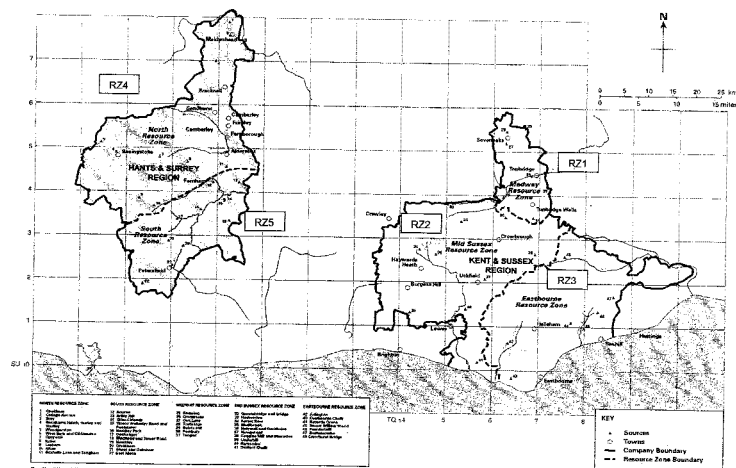


Figure 2 South East Water Resource Zones



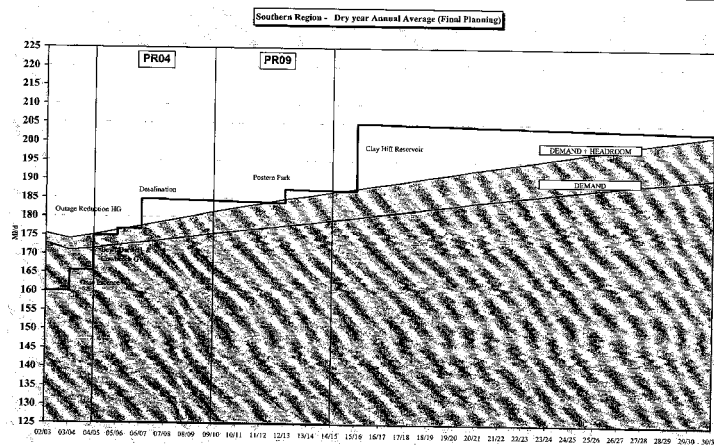


Figure 3 Supply Demand Balance Southern Region (Dry Year Annual Average, Final Planning)

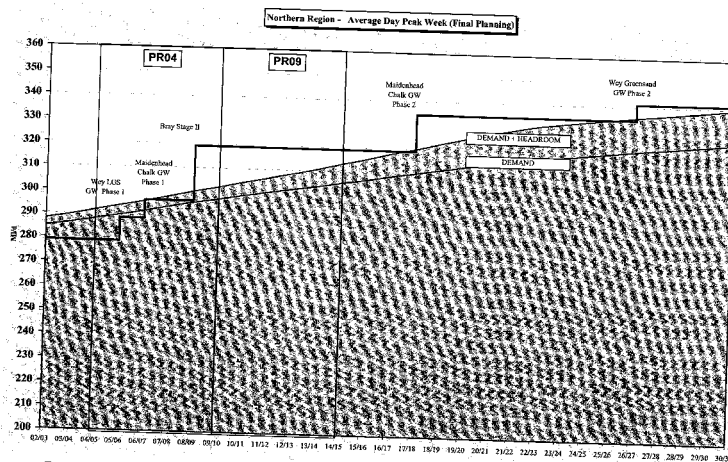


Figure 4 Supply Demand Balance Northern Region (Average Day Peak Week, Final Planning)

10.0 SOUTHERN WATER

10.1 Relevant minutes and correspondence are reproduced below.

WEALDEN LOCAL DEVELOPMENT FRAMEWORK REGULATION 25 CORE STRATEGY EARLY ENGAGEMENT SOUTHERN WATER

NOTES OF MEETING

Date of Meeting: 21 March 2007

Place of Meeting: Council Offices, Pine Grove

In attendance:

Chris Kneale, Corporate Planning Manager, Southern Water

Susan Solbra, Southern Water

Marina Briginshaw, WDC

Jacqueline Watson, WDC

Purpose of Meeting: To address the issues raised in WDC's letter dated 19 February 2007 issued to all key service providers re. Core Strategy.

GENERAL BACKGROUND

1. SW has a duty to drain and connect new development. They do not have powers to refuse connections;
2. SW requires policies in LDFs which support provision of infrastructure, ie. Land for facilities, protection of infrastructure in terms of capacity, timing and phasing of development, protection of water resources – aquifers, and avoidance of development in close proximity to waste water treatment in line with PPS23 – need to separate development from treatment (typically odour dispersion modelling suggests 400m clearance (case law in Thames)). OFWAT position is that if developers build next to facilities they should fund odour control and the cost should not be met through an increase in bills to existing customers, although there is no clear mechanism for achieving this.
3. SW advised that they have produced a document entitled “guiding principles” setting out what they are looking for from the LDF process. SW agreed to issue a further copy to WDC;
4. SW explained that developers can at their expense requisition SW to provide sewerage infrastructure under Water Industry Act. If there is an existing sewer they have a right to connect. SW noted that there are some differences in rights depending upon whether a site is Greenfield or brownfield. SW will look for planning conditions to be applied in some instances to ensure that the connection is made to the point where capacity exists. For greenfield sites SW also have powers of direction under the Water Industry Act to ensure connection is made at a point where capacity exists.
5. Developers must construct sewers in line with national standards set out in the current version (Version 6) of “Sewers for Adoption” (see <http://www.wrcplc.co.uk/sfa/>). SDS not adoptable by drainage authorities. They do not fall within the legal definition of a “sewer” – so under current law they cannot adopt. Drainage systems must have a free pipe discharge to meet the definition of a sewer. Councils can evidently adopt SDS. There are issues over maintenance therefore and appropriate provision needs to be made to guarantee they continue to operate as designed. One issue is that if future housing occupiers subsequently decide to make a connection to the sewer instead, the main pipe diameter will not have been designed to accommodate additional surface water and the system cannot cope, leading to flooding of property. SW referred to an

“Interim Code of Practice for SDS” and a model agreement for maintenance, they agreed to provide a web link to WDC. <http://www.ciria.org/suds/icop.htm>

6. Ofwat 2009 Period Review will set customer charges and define investment plans for the period 2010-2015.
7. The EA is the environmental regulator on drainage issues. Their policy with respect to effluent discharges to the environment is set out in their report “Creating a Better Place: Planning for Water Quality in the South East”. The EA has been looking at the environmental capacity available to accept additional waste water discharges.

WEALDEN SPATIALLY SPECIFIC ISSUES

Sussex Coastal Towns Policy Area

8. SW advised that the 2007 EA report “Creating a Better Place: Planning for Water Quality in the South East” has identified that there is an environmental constraint which limits the additional number of households that can be connected to some WTWs. The constraint reflects that current wastewater treatment technology is unable to remove pollutants to levels low enough to meet the water quality objectives of the receiving waters. Both WTWs at Hailsham that discharge effluent to the Pevensey Levels fall in to this category. The EA has advised SWS that it will not be permitted to increase the effluent load discharged above that currently consented. The EA has also set headroom figures for the number of additional connections that can be made to each WTW.
9. SW advised that EA figures on headroom for the two Hailsham treatment works are as follows:

Hailsham North (which drains the northern half of Hailsham) 2,800 dwellings; and
Hailsham South: (which drains the southern half of Hailsham and Polegate) 1,900 dwellings.
10. SW advised that these figures are liable to change (reduce) having regard to forthcoming studies by the EA on habitats directive and consents. WDC would need to clarify with EA how these figures have been calculated, and to what extent they take into account or otherwise sites already granted planning permission and sites identified in the non-statutory local plan. SWS anticipated that much of the headroom available would be taken up by development coming forward from the Wealden Non Statutory Local Plan. It cannot accommodate the needs arising from the South East Plan. *Southern Water has subsequently indicated that taking a cautious approach, the assessment of “headroom capacity” also has regard to an assumption about increasing flows from existing households, as well as an increase in flows likely to be generated per new household.*
11. SW explained that a consent to discharge has regard to two factors: firstly volume and secondly pollutant levels. If pollutant levels cannot be reduced via technology, then volume is the constraint.
12. SW indicated that some consideration will need to be given to separating out surface water from foul within the catchment, but this would be an expensive and extremely disruptive operation;
13. SW made reference to forthcoming studies which will influence the process:
 - (i) SW/EA/WDC Growth Study (Simon Sharp coordinating) – outcomes study to be completed by June, this will clarify the current situation and identify options for the future

- (ii) EA Study (Habitats Directive Review of Consents)– which is reviewing each abstraction and effluent discharge consent against environmental standards required to meet the Habitats Directive. The outcome of the review is due to be published by the end of March. This report could change the EA's previously held view on capacity. It will identify 3 approaches for dealing with consents/abstractions: stay as at present; improvements are needed or consents to be revoked. A further report is due to be published by the EA in June indicating mitigation measures.
14. An alternative discharge point is needed to meet the needs arising from new development proposed in the draft South East Plan. SWS believe that this could prove difficult to achieve having regard to the new habitats directive which would preclude any deterioration in water quality. The options being investigated are as follows:
- (i) New works and drainage point to the Cuckmere, upstream of Arlington;
 - (ii) A new sea discharge point in the Pevensy area (this could require existing drainage from the Polegate area to be re-routed southwards); and/or
 - (iii) Separation of foul and surface water drainage, which then needs to be piped to somewhere with chalky ground conditions for the surface water outlet/discharge.
15. SW advised that achieving an alternative discharge point would require finding a suitable site, obtaining planning consent and effluent discharge consents. Although construction would only take two years, gaining the necessary permissions and funding could take up to 15 years. The constraint will apply to all development locations within the Hailsham/Polegate catchment. SW will be looking to Core Strategy to highlight this issue, along with Waste Local Plan. Given the timing of the next periodic review it is important to involve ESCC in site finding exercises as soon as practical so that it can feed in to the next periodic review (the next funding bid would be a further 5 years away). It was agreed that a meeting between ESCC, WDC, EA and SW would be set up for June 2007.

Other Hailsham Issues

16. SW confirmed that the Hailsham South Works have been modelled in terms of odour safeguarding. SW believed that the 400m distance applies but will confirm. The North Works at Battle Road have also been modelled. Further details will be provided.

Edge of Eastbourne Urban Area

17. SW did not support development on the northern edge of Eastbourne, given the potential to take away from capacity required to serve planned development in Eastbourne itself. There is finite capacity at Eastbourne because the WTW is contained in an underground concrete box at the beach. Options for increasing this further will be very costly. SW agreed to offer a more definitive view on edge of Eastbourne and what if any scale of development could be accommodated.

Berwick Station

18. No significant drainage issues – it would be primarily down to the EA on environmental issues.

Lower Dicker Area

19. Same issues would apply as for Hailsham and Polegate.

Rest of Wealden

Uckfield

20. SW advised that there are no significant environmental constraints on drainage capacity. Some upgrading may be necessary to cope with additional volumes, including new sewers, but the space is available to extend. There is also headroom in the consent for additional growth.
21. SW advised WDC to consult with EA to reaffirm its understanding that the discharge is ok.
22. SW agreed to check whether any modelling of the Uckfield works (odour) had been carried out. SW believed that any option necessitating relocation may not be viable, a similar situation at Southampton cost in the order of £40-60M. It would also be dependent upon obtaining planning permission from ESCC. Any new site would need to be away from development, accessible to a road and close to the river. SWS agreed to provide a cost estimate for moving the WTW to the western side of the Uckfield by-pass.

Maresfield

23. SW indicated that some upgrading of Maresfield WTW may be needed if further development took place.

Crowborough

24. SW confirmed that there are 2 treatment works serving Crowborough: One at St. Johns covering the north of the town and the other at Redgate Mill covering the south of the town. SW believe that there is environmental headroom in the south, but advised that the EA be consulted specifically on this point. Otherwise no significant constraints to development at Crowborough subject to localised sewer capacity issues.

Heathfield

25. SW indicated that there is significant additional spare capacity in this catchment now that the Merrydown Works is not operating.

Villages

26. SW believed that there would be little spare capacity in any village – as catchments are generally small and capacity is provided to meet demand. Any development in the order of 10% or more of the existing settlement size is likely to be considered as significant from a drainage perspective.
27. SW suggested that WDC liaise with the EA to establish which village catchments are particularly environmentally sensitive.

Edge of Tunbridge Wells

28. SW believed that development in this area may trigger environmental exceedance levels, but otherwise in capacity terms, capable of being accommodated.

WATER RESOURCES ISSUES

29. Bewl Water – SW is looking for support for the extension of Bewl, including provision within LDFs. The Water Resources Strategy for the SE has concluded that the extension of Bewl would be an economic option. Feasibility studies are about to commence – WDC will be consulted. Bewl is owned by SW. For further information, SW referred WDC to the EA Drought web site and to the Final Report for Reg. PAC Committee.

30. South East Water – looking at options at Clay Hill and at Newhaven for increasing water supply.

Papers Provided to WDC by SW at Meeting:

1. Environment Agency, Creating a Better Place: Planning for Water Quality and Growth in the South East, Version 11 (FINAL);
2. Addendum 2 (Alternative Discharge Locations) Creating A Better Place: Planning for Water Quality and Growth in the South East;
3. 2 No. Plans illustrating division for treatment works at Polegate/Hailsham and for Crowborough/Maresfield/Uckfield.

APPENDIX A

Southern Water is committed to:

1. **Meeting the increased demand for services arising from new development.**
2. **Protecting groundwater and surface water sources from pollution.**
3. **Providing high levels of service to new and existing customers, and meeting strict environmental standards in the treatment of wastewater.**
4. **Promoting efficient and sustainable use of water resources and wastewater assets.**
5. **Protecting sensitive development from odour pollution.**

To achieve these aims, Southern Water looks to Local Development Frameworks to provide policies in line with the following guiding principles:

GUIDING PRINCIPLES

Aim: Meet the increased demand for services arising from new development.

Guiding principles: Ensure that:

- ✓ sufficient land is allocated for development in the Local Development Framework (LDF) to meet policies laid down in the Regional Spatial Strategy. LDF allocations inform Southern Water's investment programme, which aims to provide additional water and wastewater service capacity in the right places at the right time.
- ✓ the LDF supports provision of new utility infrastructure, including water and wastewater infrastructure. This will help to ensure timely provision of additional capacity to meet the demand arising from new and existing development.
- ✓ a policy is in place to secure developer contributions in appropriate cases. This would accord with the water industry's economic regulator, OFWAT, who takes the view that the developer should fund upsizing of local networks where this is required to meet demands arising from growth.

Aim: Protect groundwater and surface water sources from pollution.

Guiding principle: Ensure that policies are in place to:

- ✓ prevent development that would lead to unacceptable deterioration in the quality and potential yield of groundwater and surface water sources.

- ✓ support provision of new infrastructure to enable treatment of wastewater to high environmental standards, as set by the Environment Agency.

Aim: Provide high levels of service to new and existing customers, and continue to meet strict environmental standards in the treatment of wastewater.

Guiding principles: Ensure that policies are in place to:

- ✓ require phasing of developments when existing infrastructure and treatment capacity is insufficient to meet the increased demand. This is particularly important when necessary investment has long lead-in times, and implementation is subject to delays beyond Southern Water's control.
- ✓ promote appropriate surface water drainage systems and flood protection. This will prevent inundation of the public sewerage system, which could result in foul water flooding of properties.
- ✓ make land available for the expansion of wastewater treatment works when demand arises. New treatment works may also be needed on rare occasions.

Aim: Promote efficient and sustainable use of water resources and wastewater assets.

Guiding principles: Ensure that policies are in place to:

- ✓ encourage water efficiency in new developments.
- ✓ secure pre-construction agreement on utility infrastructure at large and/or mixed-ownership sites, and a co-ordinated whole-site approach. This will promote sustainable sewerage and water supply networks, and prevent the proliferation of smaller, less efficient networks.
- ✓ ensure that on-site and off-site sewers serving new developments of ten or more dwellings are constructed to adoptable standards. Developers should be referred to the current edition of *Sewers for Adoption*.
- ✓ separate surface water run-off from foul sewers. This will provide more efficient use of foul sewers, and reduce the risk of foul water flooding.

Aim: Protect sensitive development from odour pollution.

Guiding principle: Secure policies which:

- ✓ ensure that sensitive developments are not located close to wastewater treatment works (unpleasant odour zone).

Southern Water's policy on Sustainable Drainage Systems (SUDS)

Proper arrangements for surface water drainage are important in new developments. This is because the area of impermeable surface is usually increased, which promotes rapid runoff rather than percolation of the water into the ground. The effect can be to increase both total and peak water flows, which can lead to flooding both on-site and elsewhere.

Southern Water is supportive of the objectives of SUDS. However, such systems often rely on facilities which are not adoptable by sewerage undertakers, and require long term maintenance. The developer must therefore ensure that arrangements exist for the long term maintenance of SUDS, so that their effectiveness is maintained in perpetuity. The local planning authority plays an important role in ensuring that this is achieved. Further guidance

is provided in the Interim Code of Practice for Sustainable Drainage Systems (<http://www.ciria.org/suds/icop.htm>).

In our view it is unrealistic to expect individual occupants of a new development to maintain SUDS, as they may not have the necessary skills or knowledge. If the system is not adopted by the local authority, the highway authority or the sewerage undertaker, a private arrangement will need to be put in place by the developer, for example a management company. As explained in the Interim Code of Practice for Sustainable Drainage Systems, funding for maintenance under such circumstances can be generated from a maintenance contract. This arrangement would need to be bonded through a Section 106 Agreement to enable the local authority to take over the ownership and management of the feature should the arrangement fail.

The design of SUDS must be appropriate for the location. Factors that need to be considered include topography, run-off rates and ground conditions in relation to the size, type and density of development. SUDS are not suitable in areas with limited free drainage, for example in areas with clay soils.

Failure of SUDS could lead to surface water flooding, and inundation of the foul sewerage system. This could compromise the functioning of the system, leading to foul water flooding of land and property.

Proposed policy text (development plan document):

Development proposals must incorporate appropriate arrangements for surface water drainage to ensure that the risk of flooding after construction is not increased on site or elsewhere. The Council will seek Sustainable Drainage Systems (SUDS) of appropriate design, where practical. SUDS proposals must include maintenance arrangements to ensure effective drainage throughout the lifetime of the development.

Papers issued to WDC by Southern Water at Meeting of 21 March 2007

*Received for
S. Water
21/3/07*

Environment Agency

**CREATING A BETTER PLACE:
PLANNING FOR WATER QUALITY AND GROWTH IN
THE SOUTH EAST**

Version 11 (FINAL)

Water Quality and Growth in the South East

Executive summary

- 1 The purpose of this report is to influence the distribution of houses built in the area of the South East of England Plan in order to safeguard environmental water quality. It is based on assessment of potential impacts.
- 2 Housing development in the wrong locations could adversely affect water quality in our rivers and streams. As well as damaging stream ecology and other wildlife, this could pose risks to water uses including water abstracted for public supply.
- 3 The Environment Agency has been working with the South East of England Regional Assembly (SEERA) and the water companies to identify sensitive locations where sewage treatment technology may not be capable of protecting the waters which would receive effluent arising from new housing.
- 4 We have carried out studies, using computer models, to predict effects on rivers and to define limits on acceptable effluent flows and housing in some locations.
- 5 We conclude that there are 7 locations where a limit needs to be imposed on housing beyond that already connected. (These sites are shaded amber on the attached map).
- 6 Our recommendations reflect this conclusion and also that in all cases, provision of adequate sewerage systems and sewage treatment facilities should precede the connection of flows from new development.
- 7 For all locations place names in this report refer to sewerage catchments that do not necessarily coincide with administrative areas of the same name. Although we recommend constraints on development there may be potential for redirecting effluent to less sensitive receiving waters where some or all of the constraints would be removed.

1.0 Introduction

- 1.1 Good water quality is essential for the people, businesses and wildlife in the South East. Our rivers and groundwater are used for public drinking water supply. Good quality water is also essential to maintain fisheries, recreation, navigation and biodiversity. It is fundamental to sustainable development, health and quality of life in the South East.
- 1.2 This report assesses the distribution of houses in the South East Plan to ensure we improve and protect our water environment. Housing development needs to be in the right place and supported by the right infrastructure otherwise it will cause harm to water quality, wildlife, drinking water and recreational uses.
- 1.3 Planning Guidance presumes that planning controls should not be used to achieve pollution prevention when water pollution legislation can be used. Also, there has been a presumption in Planning/Development Control that pollution problems can always be solved by the installation of appropriate treatment facilities/technology and that they should not therefore impede development.
- 1.4 With the pressure for development in the South East, it is considered that future protection of the water environment cannot be secured on this basis and that proactive planning to secure the necessary water infrastructure is essential. The most important aspect of this in relation to water quality is the provision of adequate sewerage systems, sewage treatment and disposal.
- 1.5 If housing development is allowed to proceed in inappropriate locations there is a significant risk of deterioration in environmental water quality, potentially leading to:
 - failure to achieve River Quality Objectives;
 - failure to comply with statutory EC Directives, including a risk of costly infractions against the UK;
 - adverse effects on drinking water supplies;
 - detrimental effects on ecology/biodiversity;
 - reduction in amenity and recreational value.
- 1.6 The Environment Agency has been working with SEERA and the water companies (Thames Water and Southern Water) to identify locations where there is a risk that the sewage treatment works will be unable to treat the sewage from the proposed new housing to the standards required to protect water quality. Computer models have been used to predict the effects of the extra housing on river water quality.
- 1.7 Our studies have assessed the chemical effects of the increase in sewage effluent. Further studies may need to assess the impact on river ecology that could arise from significant increases in volumes of sewage effluent at a few locations and further investigative work is planned. Early indications do not suggest any river flooding problems will be caused by the proposed increases in sewage effluent flows.

- 1.8 This analysis assumes that the sewage from new housing is accommodated through expansion or upgrade of existing sewage treatment works (STWs). As part of the planning process, other solutions, such as discharging sewage effluent at different locations, need to be fully investigated in future work.
- 1.9 This report concentrates only on sewage treatment works placing a constraint on development due to a lack of available treatment technology. Adequate protection of water quality may also require infrastructure improvements to carry increased sewage flows. In particular sewerage systems that are well designed and incorporate up to date storm overflows and flow balancing facilities must be in place ahead of development.
- 1.10 Increased urbanisation will bring with it additional effects on water quality, such as diffuse pollution from road run-off. This report has not considered this impact. However, it is assumed that general pollution prevention policies contained within the South East Plan, such as those relating to sustainable drainage systems (SUDS), will help to address these impacts.
- 1.11 All place names in this report refer to sewerage catchments that do not necessarily coincide with administrative areas of the same name.

2.0 Initial Assessment

- 2.1 In order to identify potential areas of constraint, screening criteria were developed by the Environment Agency, based on the stringency of sewage treatment works (STW) discharge standards. A stringent consent¹ is an effective indicator that an effluent receives little dilution and/or discharges to a high quality watercourse. Tightening these already strict standards is likely to be an expensive treatment option.
- 2.2 The two-tier system developed by the Environment Agency for identifying sewage treatment works locations potentially constrained by water quality is shown in the table below. The table shows two sets of effluent standards (expressed as concentrations of pollutants). The first (criterion 1) are difficult and expensive to meet. The second (criterion 2) are even more expensive to meet and are at the limits of known treatment capability.

Table 1

	STW consent standard		
	Biochemical Oxygen Demand	Ammonia (N)	Phosphate (P)
Criterion 1	<10mg/l	<3mg/l	1mg/l
Criterion 2	<5mg/l	<1mg/l	1mg/l

- 2.3 The two sets of environmental criteria determine the scale of our concern and are defined as follows:

Criterion 1 Locations where growth may be constrained by environmental water quality, but which require further analysis. Development in these locations may require special technical measures and additional expenditure.

Criterion 2 Locations where significant development is likely to lead to an unacceptable risk of deterioration in water quality and where solutions that would protect the environment/water resource appear to be beyond the scope of established technology.

3.0 Refined Approach

- 3.1 A joint meeting between the Environment Agency, SEERA and the water companies in June 2005 concluded that a more detailed study would be needed in order to inform decisions on district level housing allocations.

¹ The Environment Agency issues a discharge consent for all discharges of sewage to controlled waters.

- 3.2 The initial assessment identified 67 STWs for further study out of the STWs within the SE Plan boundary.
- 3.3 Mathematical models were either built or modified from existing models for the 67 STWs with the Environment Agency's SIMCAT model being used for most locations. A small number of cases were examined using the Environment Agency's River Quality Planning tool. Southern Water's works at Tenterden and Playden/Iden were examined using an existing Entec Integrated Lake and Catchment model. The work was carried out by the Environment Agency, WRc plc and Entec Ltd.
- 3.4 These models were used to examine the impact of the projected housing growth to 2026. Originally, where available, we used location specific housing numbers derived from water company discussions with sub-regional planners. Where these were not available, we used the standard growth rate proposed by the South East Plan i.e. 28900 per annum across the region.
- 3.5 However, since May 2006, we have obtained more housing information from County and District Planning Authorities. Use of this information has led to reduction of the number of STWs which cause us concern from 25 to 7.
- 3.6 We also calculated how many additional houses² could be connected to each prioritised sewage treatment works without requiring effluent standards that can not be achieved using currently established technology. We assessed the following parameters as being indicative of the 'load' on the environment: biological oxygen demand (BOD), ammonia, nitrogen and phosphorus.
- 3.7 These determinands were selected because they are the ones most likely to require constraints to protect water quality in the receiving waters. The table below sets out the relevant environmental quality standards (EQS) used in this report.

² The number of additional houses was calculated from additional flow by assuming average house occupancy of 2.5 people and a population equivalent flow of 200 litres per person per day (which includes an allowance for unaccounted flow). It is assumed for the purposes of this report that these numbers will stay the same to 2026.

Table 2.

EQS	BOD₅ (mg/l) (90 %ile)	Amm. As N (mg/l) (90%ile)	Ortho as P (mg/l) (annual average)	Nitrate as N (mg/l) (95%ile)
RE1	2.5	0.25		
RE2	4	0.6		
RE3	6	1.3		
RE4	8	2.5		
FWFD Cyprinid		0.78 (95%ile)		
FWFD Salmonid		0.78 (95%ile)		
HD Headwaters			0.06	
HD River			0.1	
SWAD				11.3

- EQS = Environmental Quality Standard
- BOD₅ = Biochemical Oxygen Demand over 5 days
- Amm. = Ammonia
- Ortho = Orthophosphate
- Nitrate as N is the same as Total Oxidised Nitrogen as N for the intents and purposes of this report
- RE1 = River Ecosystem class 1
- FWFD = Fresh Water Fish Directive
- HD = Habitats Directive
- SWAD = Surface Water Abstraction Directive
- All targets used are in accordance with Environment Agency policy

4.0 Results

- 4.1 Table 3 shows the locations where growth projected to 2026 can be accommodated, but stricter discharge consents will be required to protect water quality. Upgrades to the sewage treatment facilities will be needed to meet these tighter standards. The water companies have provided estimated cost bands. However, some of these will include an element of environmental improvement where work is also needed to improve already unsatisfactory rivers. It has not been possible to separate the costs of this environmental improvement from those attributable solely to growth. Costs quoted are capital expenditure only. In addition to these costs of STW improvements, there will be additional capital costs for upgrading sewers and additional costs for operating enhanced treatment facilities.

Table 3: Locations where growth projected to 2026 can be accommodated with stricter discharge consents.

Sewage treatment works name	Capital cost band for wastewater treatment
Arborfield	L
Ascot	L
Ashford	L
Banbury	L
Beddington	L
Bicester	L
Bracknell	M
Brockenhurst	L
Canterbury	L
Charing	H
Chertsey	L
Chilbolton	M
Dambridge	M
Eastry	M
Eden Vale	H
Felbridge	L
Fleet	L
Guestling	M
Guildford	L
Harestock	L
Hartley Wintney	M
Herne Bay	L
Hockford:Pirbright	M
Hungerford	L
Kings Somborne	L
Leatherhead	L
Lenham	M
Long Crendon	M
Maidenhead	L
Maple Lodge	L
Oxford	L
Pagham	M
Playden & Iden	L
Pulborough	L
Reading	M
Romsey Greenhill	L
Scaynes Hill	L
Sidlesham	L
Slough	L
Stockbridge	M
Tangmere	M
Tenterden	M
Wargrave	L
White Waltham	M
Wisley	M

Costs assessed in bands as follows:

£k/ additional housing unit
H = >10
M = 5 – 10
L = < 5

Information for Ashford has been derived from a more detailed separate study.

Explanation of Table 3

- i) Table 3 shows the locations where growth to 2026 can be accommodated. For each of these works, our calculated allowable number of additional houses exceeds the number of extra houses that are likely to be built to 2026.
 - ii) The number of extra houses likely to be built to 2026 has been derived in a number of ways. In some cases Local Planning Authorities (LPA) have provided estimated figures. In the majority of cases, however the LPAs have only confirmed that the number of extra houses to 2026 will be less than the allowable number of houses we have calculated.
 - iii) In the absence of any information from LPAs, the number of extra houses anticipated has been obtained from the water companies. The water companies data has been provided as follows:
 - For Southern Water – application of the standard growth rate of 28,900 per annum between 2006 and 2026.
 - For Thames Water – predictions based on their SOLAR model have been used.
- 4.2 The total estimated cost of providing treatment to the required standard, to accommodate the houses to 2026, for the works listed in Table 3 is approximately £1.5 billion. This is the sum of the cost band multiplied by the extra houses likely to be built to 2026 for each works. Calculating costs for each STW is complicated as each is based on different sources of housing data. We have presented an overall cost estimate since individual STW costings would represent a level of accuracy which cannot be justified using the available data.
- 4.3 Table 4 lists sites where we recommend a limit to be imposed on housing beyond that already connected. (These sites are shaded amber on the attached map). With the exception of Chickenhall, Hailsham North and Hailsham South, there are no costs associated with these works as they are already funded to accommodate this housing limit.
- 4.4 We examined the effects that increasing flows of effluent (resulting from increasing house numbers) would have on river quality downstream of the relevant sewage treatment works. We took the quality of the effluent to be the best achievable with established technology. Based on this approach, the number of houses which could be accommodated without causing the Environmental Quality Standard in the river to be exceeded is the allowable number which can be connected to the relevant sewage treatment works.
- 4.5 In addition to achieving Environmental Quality Standards any new permit conditions set at Best Available Techniques limits must not allow greater than a 10% deterioration of the current planned downstream river quality. The number of houses that could be accommodated without exceeding this deterioration in downstream river quality is the allowable number that can be connected to the relevant sewage treatment works. We oppose development that would cause exceedence of the Environmental Quality Standards or an unacceptable deterioration of the current planned downstream river quality.

- 4.6 In the case of orthophosphate EQS failures, we applied two further tests before deciding whether or not to oppose development. Firstly, we would not oppose the relevant development if the works would only contribute a small percentage (< 10%) of the phosphate load carried by the river below the discharge. Also, we would not oppose development unless it would cause a greater than 10% increase in phosphate concentration in the river. This is because it is not necessary to obstruct development in areas where the receiving water fails the EQS if it can be demonstrated that controlling other point and/or diffuse sources will provide a more cost effective means of achieving long-term EQS compliance.

Table 4: Locations where a limit should be placed on additional housing

Sewage treatment works name	Capital costs for wastewater treatment	Allowable number of additional houses	Cost £k
Chickenhall (Eastleigh)	Partially funded in AMP	4,000	?
Fullerton (Andover)	Already funded in AMP	4,500	0
Hailsham North	Partially funded in AMP	2,800	?
Hailsham South	Partially funded in AMP	1,900	?
Hogsmill Valley	Already funded in AMP	3,500	0
Horsham	Already funded in AMP	3,800	0
Newbury	Already funded in AMP	2,700	0
	Total	23,200	0

Notes

- (i) Where Local Planning Authority data predicts that the number of additional houses to 2026 will exceed the "allowable number of additional houses" for a sewage treatment works (STW) the STW has been listed in Table 4. The following assumptions have been made for this purpose: The "allowable number of additional houses" was calculated from the allowable additional flow (see paragraph 4.3 above) by assuming average house occupancy of 2.5 people and a population equivalent flow of 200 litres per person per day (which includes an allowance for unaccounted flow).
- (ii) If in the future, it is demonstrated that per capita water consumption has decreased, consideration will be given to increasing the allowable number of additional houses.
- (iii) We are awaiting better information from Southern Water on actual flows from Chickenhall (Eastleigh) and the allowable number of additional houses figure may change in the light of that information.

- 4.7 The following list shows those works which can treat flows to 2026 without requiring extension or enhanced treatment.

Table 5 Locations where growth to 2026 can be accommodated without incurring capital cost.

Sewage treatment works name
Ash Ridge, Wokingham
Burghfield
Cranleigh
Esher
Kintbury
Woking

- 4.8 The following list shows works where further study is required. It is therefore not possible at this stage to decide whether there should be a limit on future housing or, of course, what that limit should be. More information on further work is contained in Section 6.

Locations requiring further study

Sewage treatment works name
Aldershot
Ash Vale
Aylesbury
Basingstoke
Camberley
Crawley
Eversley Cross
Eversley Lower Common
Sandhurst

- 4.9 The total additional housing for sites in tables 3 to 5 has been subtracted from the total additional housing proposed in the South East Plan (578,000) to calculate the residual housing (i.e. housing which will be connected to other STWs). A cost for this final residual housing has been derived using the lowest cost band and is as follows:

Sewage treatment works name	Capital costs for wastewater treatment	Number of extra houses	Cost £k
Residual STWs (excluding 59 with studies completed)	L	248,000	1,200,000

4.10 Total Costs

Adding the above cost for residual housing to the total costs from tables 3 to 5 gives a **grand total cost for provision of sewage treatment facilities for the proposed housing of £2.8 billion** (£140 million per year for the period of the plan). This does not include provision of enhanced sewerage systems or any operational costs. This figure for wastewater treatment could increase by up to £0.4 billion depending on the results of further studies relating to those STWs requiring further study. The cost of the residual housing represents approximately 43% of the total costs.

4.11 Note.

The selection of locations mentioned in this report is based on the current proposals of the draft South East Plan. If house numbers and distribution should change significantly, the findings of this study will need to be re-visited.

Alternative discharge locations

4.12 We have carried out some studies with the water companies to identify possible new sewage effluent discharge locations which could be used for the discharge of the flows arising from new development. This would remove the need for restriction on housing numbers. The relevant STWs for the period of the SE Plan are those listed in table 4.

4.13 There are many considerations to be taken into account, but it seems likely that significant new discharges of effluent into the ground will be unacceptable. This means that to date we have not identified any alternatives for Fullerton (Andover). There are similar difficulties for Chickenhall (Eastleigh).

4.14 There may be viable alternatives for the other works in table 4, but it is too early to draw any conclusions. In any event, alternatives are likely to be costly.

5.0 Recommendations

The following recommendations assume that the sewage treatment takes place in the existing locations, discharging to the same rivers as they do now. However, it may be possible to look at relocating the discharge points to less sensitive rivers in some cases.

5.1 A limit on housing growth connected to the existing sewage works should be placed on those locations listed in Table 4. The Environment Agency may object to any planning applications for housing in excess of these limits unless the developer can demonstrate that there will be no significant adverse environmental impact.

5.2 When allocating housing targets, due consideration should also be given to the costs shown in Section 4 above.

- 5.3 In all cases, adequate sewage collection and treatment facilities must be provided before new houses are built.

6.0 Further Work

- 6.1 During assessment of sewage treatment works discharging to the River Blackwater catchment, we have encountered problems related to unidentified ammonia sources. We therefore need to carry out further study on the following works:

Aldershot Town
Aldershot Military
Ash Vale
Sandhurst
Camberley
Eversley Cross
Eversley (Lower Common)

- 6.2 The present study has revealed a new concern about phosphorus concentrations downstream of Basingstoke. Further, more detailed, work is now needed to assess:

- i) the impacts of housing growth to 2011 on a nature conservation site downstream; and
- ii) the impacts of additional housing growth proposed in the South East Plan.

- 6.3 It is recommended that this work should form part of an integrated water cycle study already proposed (see below).

- 6.4 Integrated water cycle studies involving detailed investigation of all water management issues are proposed at the following locations:

Aylesbury (funding secured)
Basingstoke (partial funding secured)
Crawley (partial funding secured)

- 6.5 For catchments where the allowable number of additional houses is likely to be less than the projected growth (see Table 4) we propose further work as follows:

- i) Investigate the possibility of alternative treatment options and/or discharge locations
- ii) For feasible options determine cost of treatment and sewerage.

- 6.6 It is anticipated that the results of the studies for Aylesbury and Basingstoke will be available in time for the sub-regional debate of the EiP. The studies for Crawley and the Blackwater Valley, however, are unlikely to be completed in time.

7.0 Important Notes

- 7.1 The information and data contained in this report are without prejudice to the full determination of consent conditions in response to any future applications for consent to discharge.
- 7.2 Cost bands have been provided for indicative purposes only (see tables). They have been prepared using broad assumptions without reference to site specific factors such as land availability and power supply.
- 7.3 This study has not covered any requirements for additional or upgraded sewer networks. The scale of these is dependent on the precise location and magnitude of new development; information that is not currently available.
- 7.4 Constraints on connecting houses to sewage works discharging to groundwater could possibly be required in future years as a result of investigations related to regulations under the EC Groundwater Directive and the EC Water Framework Directive.

Environment Agency
28th Sept 2006

8.0 Annex 1 - Assumptions & Decisions

Assumptions

For the purposes of this project it has been assumed that:

- 9.1 River Quality Objectives will continue to be used for water quality planning purposes despite the fact that Ministers advised against using them to drive investment during the periodic review of water and sewerage company price limits in 2004. Currently where river quality does not meet the objective, an improvement plan has to be established. Throughout England and Wales, a Public Service Agreement has stipulated that 91 per cent of assessed river length should be compliant with their RQO by 2005.
- 9.2 Wastewater will continue to be collected and then treated at municipal treatment works as at present.
- 9.3 There is the potential for new works to replace or supplement existing facilities, but this has not been studied.
- 9.4 The per capita production of wastewater from the **existing** connected population will not increase from current levels.
- 9.5 The per capita consumption of water and production of wastewater from **new** development will stay the same up to 2026 as the figures provided by the water companies.
- 9.6 Wholesale adoption of sustainable drainage systems and water efficiency measures has not been assumed.
- 9.7 The impact of housing was assessed at sites in isolation to one another. Therefore housing growth at upstream locations may affect the ability of downstream locations to accommodate housing growth.
- 9.8 In the absence of more definitive figures, and in accordance with advice from the Regional Assembly, the rate of increase in housing growth has been based on Regional Planning Guidance for the South East Plan at 28,900 houses per year.
- 9.9 Housing figures for EA Thames Region have been supplied by Thames Water Utilities Limited. For the original 9 key growth hotspot sites identified within the Thames Water region population projections were supplied by the company based on the information contained within the SEERA planning consultation document. This was further refined by discussion with Sub Regional planners to ascertain the likely scale and location of growth. In general the highest potential population was projected. For the additional sites for which projections were sought Thames Water were only able to supply flows based on the latest update of the population estimate tool, SOLAR. Due to timescales of supplying this data the information within SOLAR was not verified against the overall growth levels for SEERA and should be regarded as indicative growth.
- 9.10 In EA Southern Region AMP 4 projected flow (2015) has been used as a base and housing numbers have been projected using a standard growth rate.
- 9.11 The following are the sewage treatment works standards achievable using best available technology for the determinands modelled:
 - Ammonia as N= 1 mg/l (95%ile)
 - BOD₅= 5 mg/l (95%ile)
 - Total Nitrogen as N= 10 mg/l (Annual Average)
 - Total phosphorus as P= 1mg/l (Annual Average)These values were agreed with the water companies.

Decisions

For the purposes of this project, the following represent decisions taken:

- 9.12 This report does not contain indicative costs for sewerage improvements
- 9.13 Current planned consents were used in the modelling work. This includes agreed AMP4 consents.
- 9.14 Consented flows were used as the basis for the modelling
- 9.15 Models were run with housing figures provided by the water companies when known: if unavailable, the assumption 30% above housing planned in RPG9 would be used. However, predictions were subsequently based on figures provided by Local Planning Authorities where available. Otherwise, a default of approximately RPG9 growth rate was used.
- 9.16 For locations affected by Urban Waste Water Treatment Directive sensitive areas, uniform emission standards would be applied for phosphorus in conformity with the directive.
- 9.17 The list of sewage treatment works modelled was ranked using priorities derived from:
 - potential stringency of consent conditions (derived from initial Environment Agency screening approach)
 - SEERA's list of preferred development locations
 - The water companies' top priority recommended works
- 9.18 We decided not to include dangerous substances in our studies since current knowledge and policy would not support constraints on housing development.
- 9.19 Total Oxidised Nitrogen (TON) could be a limiting factor to increased growth (flows). Nitrate modelling would be carried out for sites involving the Surface Water Abstracted for Drinking (SWAD) Directive. For sites involving the Habitats Directive and/or those which are Urban Waste Water Treatment Directive sensitive areas, no modelling is required for TON since the STW effluent standard will be the appropriate standard taken from the Directive or relevant regulations.
- 9.20 Phosphate was modelled using the environmental quality standards agreed with English Nature related to receiving water characteristics. This was only done for Habitats Directive (HD) or Sites of Special Scientific Interest (SSSI) in line with the Environment Agency's AMP4 approach. If a prioritised sewage treatment works does not discharge to a SSSI or a HD site and does not involve the SWAD Directive and has lots of "headroom" in relation to ammonia and BOD, it was de-prioritised.
- 9.21 For Southern Water STWs, average house occupancy of 2.5 and a population equivalent flow of 200 l/hd (which includes an allowance for unaccounted flow) were used. (These figures were supplied by Southern Water) For Thames Water STWs, the company supplied site specific flow increases.
- 9.22 Possible requirements of the Water Framework Directive have not been taken into account in this report.

10.0 Annex 2 - Glossary

Amm. - Ammonia

AMP4 - Asset Management Plan 4

BAT - Best Available Technology

BOD₅ - Biochemical Oxygen Demand over 5 days

Diffuse Pollution - Pollution which originates from various activities, and which cannot be traced to a single source e.g. atmospheric deposition, run-off from agriculture, erosion, drainage, groundwater flow and originates from a spatially extensive land use (e.g. agriculture, settlements, transport, industry).

EA policy - Environment Agency policy

EC - European Commission

EC Directive - European Community Directive (e.g. FWFD) which requires Member States to take all necessary measures to ensure identified waters meet certain quality standards prescribed for the protection of the environment and public health

EQS - Environmental Quality Standard

FWFD - Fresh Water Fish Directive

HD - Habitats Directive

N - Nitrogen

NDR - No deterioration requirement: new permit conditions set at Best Available Technology must not allow greater than a 10% deterioration of the current planned downstream river quality.

Ortho - Orthophosphate

P - Phosphorus

Point source pollution - Pollution arising from an identifiable and localised area, structure or facility, such as a discharge pipe.

RE1 - River Ecosystem Class 1 (Water of very good quality suitable for all fish species)

RE2 - River Ecosystem Class 2 (Water of good quality suitable for all fish species)

RE3 - River Ecosystem Class 3 (Water of fair quality suitable for high class coarse fish populations)

RE4 - River Ecosystem Class 4 (Water of fair quality suitable for coarse fish populations)

RE5 - River Ecosystem Class 5 (Water of poor quality which is likely to limit coarse fish populations)

RPG9 - Regional Planning Guidance for the South East

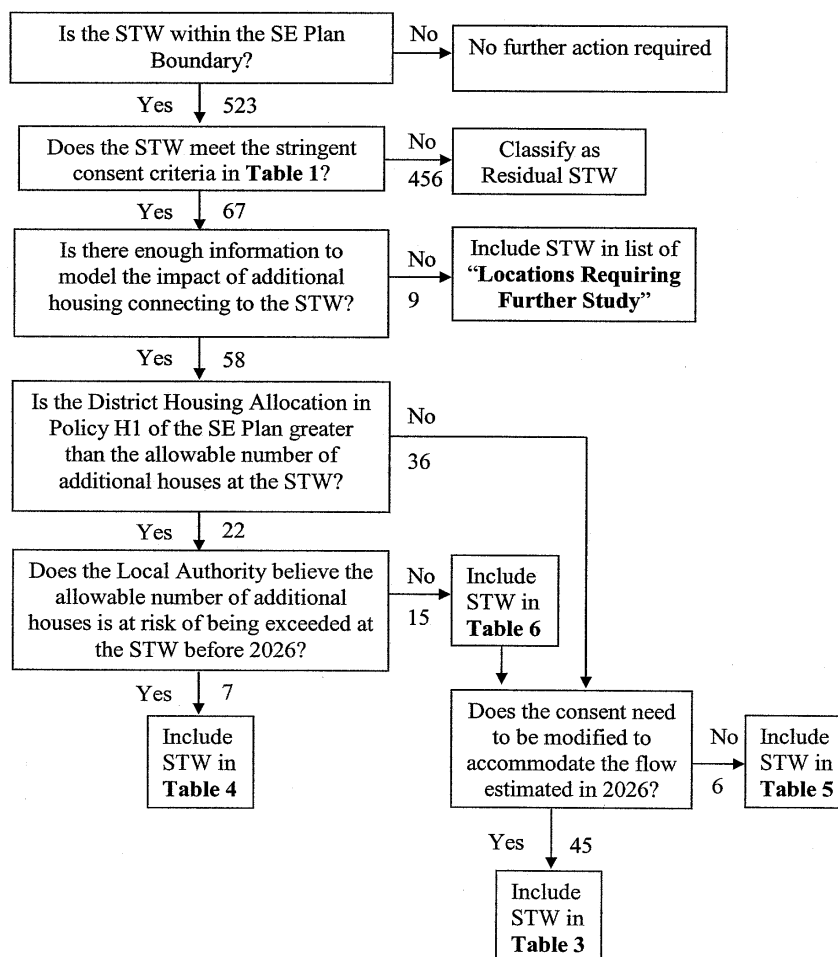
RQO - A River Quality Objective is an agreed strategic target, expressed in terms of River Ecosystem Standards, which is used as the planning base for all activities affecting the water quality of a stretch of water. It is the level of water quality that a river should achieve in order to be suitable for its agreed uses.

SEERA - South East England Regional Assembly

SIMCAT - Simulated Catchment model
SSSI - Site of Special Scientific Interest
STW - Sewage Treatment Work
SWAD - Surface Water Abstraction Directive
TON - Total Oxidised Nitrogen

ADDENDUM 3 (STW CLASSIFICATION – FLOW CHART)

CREATING A BETTER PLACE: PLANNING FOR WATER QUALITY AND GROWTH IN THE SOUTH EAST



References to tables above refer to those used in the **CREATING A BETTER PLACE: PLANNING FOR WATER QUALITY AND GROWTH IN THE SOUTH EAST** final report (version 11).

Corrections to text of the main report

- i. Last sentence in paragraph 2.2 should read: "The second (criterion 2) are even more expensive to meet and are beyond the limits of established treatment capability."
- ii. Last sentence in paragraph 3.5 should read: "Use of this information has led to a reduction of the number of STWs which cause us concern from 22 to 7."
- iii. Insert sentence at the end of paragraph 4.7: "There are no costs associated with these STWs as the current consent can accommodate the proposed extra housing to 2026."
- iv. The last sentence and text box in paragraph 4.9 should read: "While a small number of residual STWs may have no costs associated with them, as a precaution, a cost for this final residual housing has been derived using the lowest cost band and is as follows:

Sewage treatment works name	Capital cost band for wastewater treatment	Number of extra houses	Cost £k
Residual STWs (excluding 58 with studies completed)	L	248,000	1,200,000

ADDENDUM 1 (SENSITIVITY TEST)

CREATING A BETTER PLACE: PLANNING FOR WATER QUALITY AND GROWTH IN THE SOUTH EAST

1. At the data meeting of 17th October 2006, the Panel for the Examination in Public of the South East Plan questioned the effects that consideration of a higher rate of housing growth would have on this report. This addendum addresses the question.
2. Section 4.11 of the report states the selection of the locations in Table 4 (sites with a proposed limit on development) is based on Policy H1 in the South East Plan together with housing information obtained from the County and District Planning Authorities.
3. As a sensitivity test, we have assessed the impact of a higher annual average housing growth rate of 40,000 net additional houses. To do this, the previous 2026 projections have been increased pro rata. This broad-brush approach has indicated it is unlikely that a constraint will need to be placed on any additional STWs to those listed in Table 4.
4. However if the housing distribution should change significantly, an additional 15 STWs at most risk of exceeding their allowable additional housing number are listed in Table 6 below.

Table 6 Additional locations at most risk if significant changes in housing numbers and distribution occur.

Sewage treatment works name	2026 additional housing projection (A)	Allowable number of additional houses from 2006 (B)	Remaining Headroom after 2026 projection (B-A)
Brockenhurst	*	1,100	?
Charing	*	5,100	?
Chilbolton	*	7,100	?
Eden Vale	3,500	10,100	6,600
Guestling	*	110	?
Harestock	2,500	6,300	3,800
Hungerford	*	3,900	?
Kings Somborne	*	4,000	?
Kintbury	*	2,100	?
Playden & Iden	*	3,600	?
Reading	*	37,400	?
Romsey Greenhill	1,030	5,800	4,770
Sidlesham	*	1,400	?
Stockbridge	*	7,900	?
Tenterden	*	3,100	?

* No 2026 estimated housing figures available. However the Local Authority has confirmed that future development is not expected to exceed the allowable number of additional houses before 2026 at RPG9 growth rates.

Conclusion

5. When considering growth rates of 40,000 p.a., 15 additional locations (Table 6) have been identified as the most likely sites (in addition to the 7 sites listed in Table 4) where the allowable number could represent a constraint on housing growth. Also, at higher growth rates, it is likely that the constraint for sites in Table 4 will be reached earlier.

HAILSHAM NORTH & HAILSHAM SOUTH

(Note: these areas are serviced by two separate STW's but as they are so close to each other their alternative options are the same).

Possible alternative options:

1. Provide new discharge into River Cuckmere
2. Reinstate Polegate STW discharge into the West Langney Sewer which is not SSSI designated.

Discharging extra housing flow via new treated discharge point to the River Cuckmere. This is the preferred option.

A STW once operated at Polegate but this was decommissioned many years ago. The site is still owned by SWS. It was agreed that this warranted further investigation.

HOGSMILL

Possible alternative options:

1. Discharge direct to River Thames
2. Discharge to Beverley Brook.

Discharging into the River Thames is the favoured option as it is only a short distance.

HORSHAM

Possible alternative options:

1. Divert extra housing flow to Crawley STW
2. Expand existing discharge into Parsons Brook on the River Adur West (RE4 – see table 2 of report for more information)
3. Provide new discharge into Blakes Gill on the River Adur West (RE2 – see table 2 of report for more information)

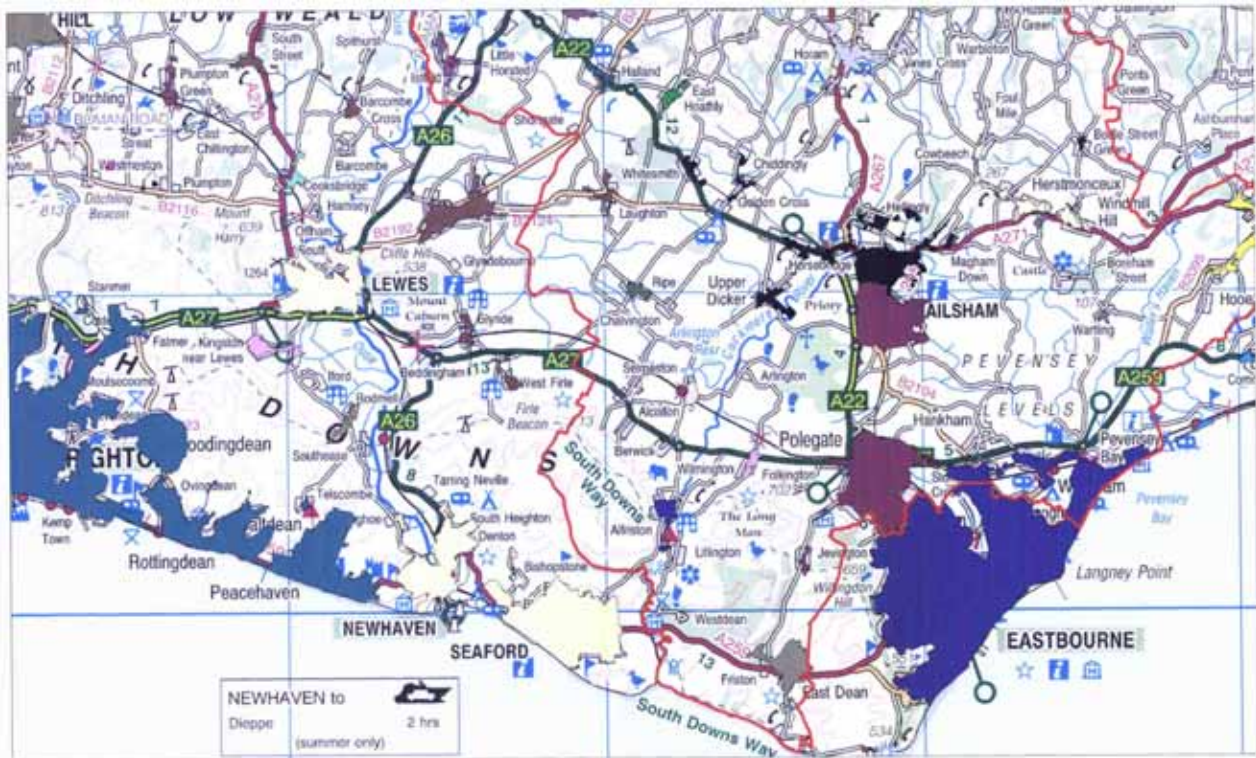
We have received an application to abstract water from the River Arun downstream of Horsham STW. Any consideration of diverting effluent to outside the Arun catchment would have to take this application into account.

NEWBURY

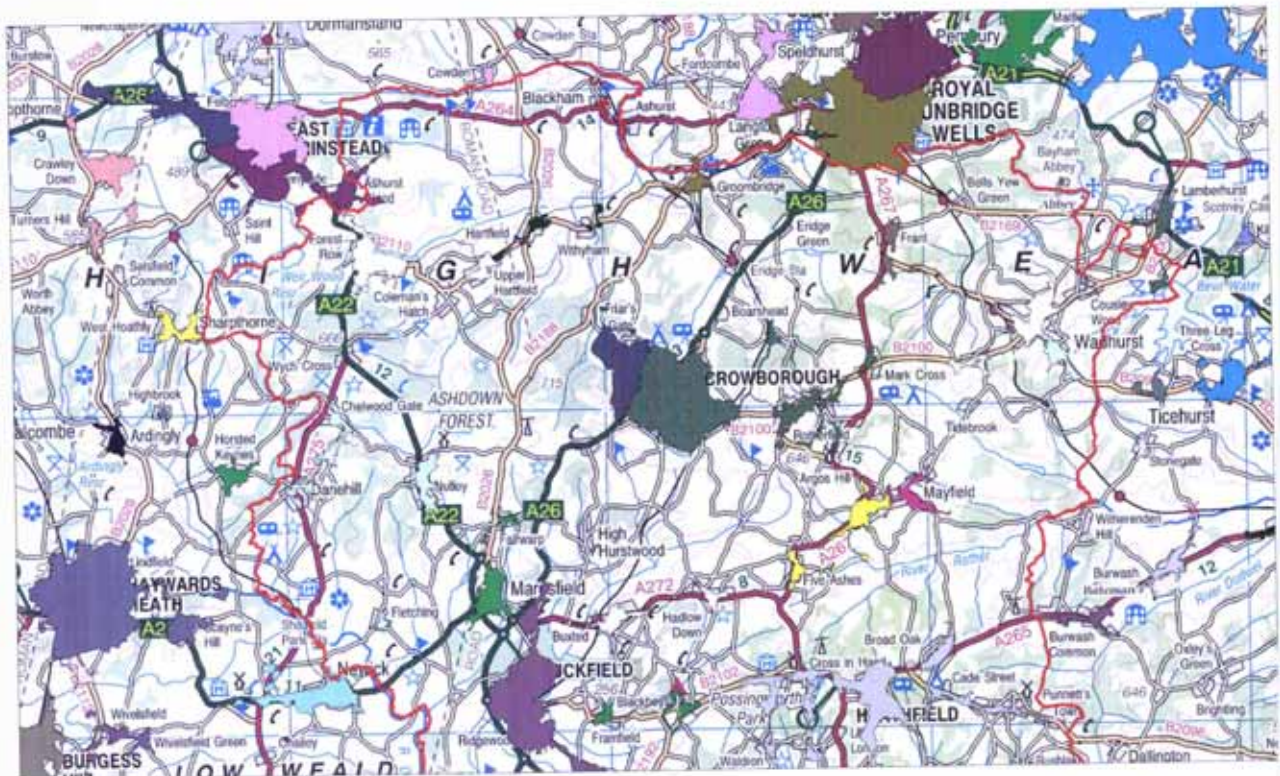
Possible alternative options:

1. Pipe effluent downstream (partial flow)
 - below SSSI on the River Kennet
 - to the River Thames
2. Pump sewage to a neighbouring STW:
 - Reading
 - Pangbourne
 - Woolhampton

Piping effluent downstream is likely to be the least cost alternative.



Revised for Summer 2007
21/3/07



Revised for Summer 2007
21/3/07

Reproduced Text from Southern Water letter dated 18 May 2007 and Addressed to David Phillips at Wealden District Council

Wealden District Local Development Framework

Thank you for your letter of 28 April inviting our views on the opportunities and constraints to development options. I have looked further into the issues raised in the letter from Jacqueline Watson of 19 February and those arising from our subsequent meeting on 21 March. The views of Southern Water are detailed below.

Although Southern Water does not provide drinking water to Wealden District it owns Bewl Reservoir, a strategic regional water resource that supplies raw water to South East Water for treatment and distribution to the District. The reservoir falls partly within the District on the north east boundary with Rother District. Policy NRM2 of the Draft South East Plan recognises the need for the provision of additional water resources as part of the "twin track" approach to meeting future water demands. Enlargement of Bewl Reservoir is planned by 2014/15. We believe the Core Strategy provides the opportunity to include enabling policies to support and facilitate its development, when required.

A key constraint to development in south Wealden is the impact of the Environment Agency (EA) report "Creating a Better Place: Planning for Water Quality and Growth in the South East", submitted by the EA to the South East Plan EiP. Their report identifies locations where environmental constraints place a limit on the number of additional houses that can be connected to some existing wastewater treatment works (WTW). The constraint reflects that current wastewater treatment technology is unable to remove pollutants to levels low enough to meet the water quality objectives of the receiving waters. Both Hailsham North WTW and Hailsham South WTW have been allocated by the EA into this category and Southern Water will not be allowed to increase the effluent load discharged above that currently consented. The EA has also set headroom figures for the number of additional connections that can be made to each WTW. No more than 2,800 additional households can be connected to Hailsham North WTW and no more than 1,900 additional households to Hailsham South WTW. The spare capacity available within the terms of the current discharge consents will be taken up by new development coming forward from the Non-Statutory Wealden Local Plan.

This constraint effectively excludes development, beyond that already set out in the Non-Statutory Plan, in the urban areas of Hailsham, Willingdon and Polegate until a new wastewater treatment works is planned, constructed and commissioned. Southern Water has already initiated a study to investigate the options as in our experience it can take up to ten years to obtain the planning, environmental consents and funding required for construction of a new works. We will continue to work with the Council and the Environment Agency to find a solution to remove this constraint. We will look to the Council to support our bid for the necessary investment funding at the 2009 Ofwat Periodic Review.

The outlook elsewhere in the District is more positive. At Uckfield, the WTW has discharge consent headroom and could be extended to accept additional flows, subject to confirmation by the EA. Any development planned close to the WTW that is sensitive to odour should be separated from it, in accordance with PPS25. As a guide, development sensitive to odour should not be located within 400 metres of the works until the odour boundary is determined otherwise by dispersion modelling. SWS is currently undertaking this modelling work which will be completed by the end of May. The addition of additional odour control plant at the WTW could reduce the size of this zone but a feasibility study would be required to fully investigate the options. Any capital works required to enable development would need to be funded by developers though planning gain. This is necessary because Ofwat does not support funding of such works though increased charges to existing customers.

As requested, SWS has commissioned consultants to estimate the cost of relocating the existing Uckfield WTW to another site. Replicating the existing WTW has been estimated by consultants Faithful and Gould at approximately £21 million, subject to finding a suitable site with planning permission and consent to discharge. This is a budget estimate subject to confirmation by detailed design. The current WTW is fully serviceable and SWS has no

investment plans for its replacement. The cost of relocation cannot be met by SWS as there is no investment driver for it to be funded by Ofwat under the Price Review process.

Small parts of the District that border Eastbourne Borough Council at Stone Cross and Sovereign Harbour drain to the Eastbourne WTW catchment. There is finite treatment capacity at the works which is contained in an underground concrete box on the Langley Point foreshore. The options for extension of the WTW are therefore limited and very costly. SWS must ensure it is able to serve new development in Eastbourne BC that arises from the South East Plan. Until the South East Plan housing allocations are finalised the capacity that can be made available to serve areas in other districts cannot be assessed.

Further development in Crowborough would drain to either Crowborough St Johns WTW to the north or Redgate Mill WTW in the south. Although investment in additional treatment plant would be required to serve new development, discharge consent headroom exists which would allow SWS to discharge more effluent.

Vines Cross WTW serves the Heathfield area and has spare capacity available following the closure of a major business within the catchment. This has released treatment capacity that could be used for further development.

Additional capacity could be made available in smaller catchments such as Berwick, Maresfield and the villages to serve new development. Small catchments can be sensitive to growth and as a rule of thumb, development that increases the existing catchment by 10% will trigger a consent review by the EA.

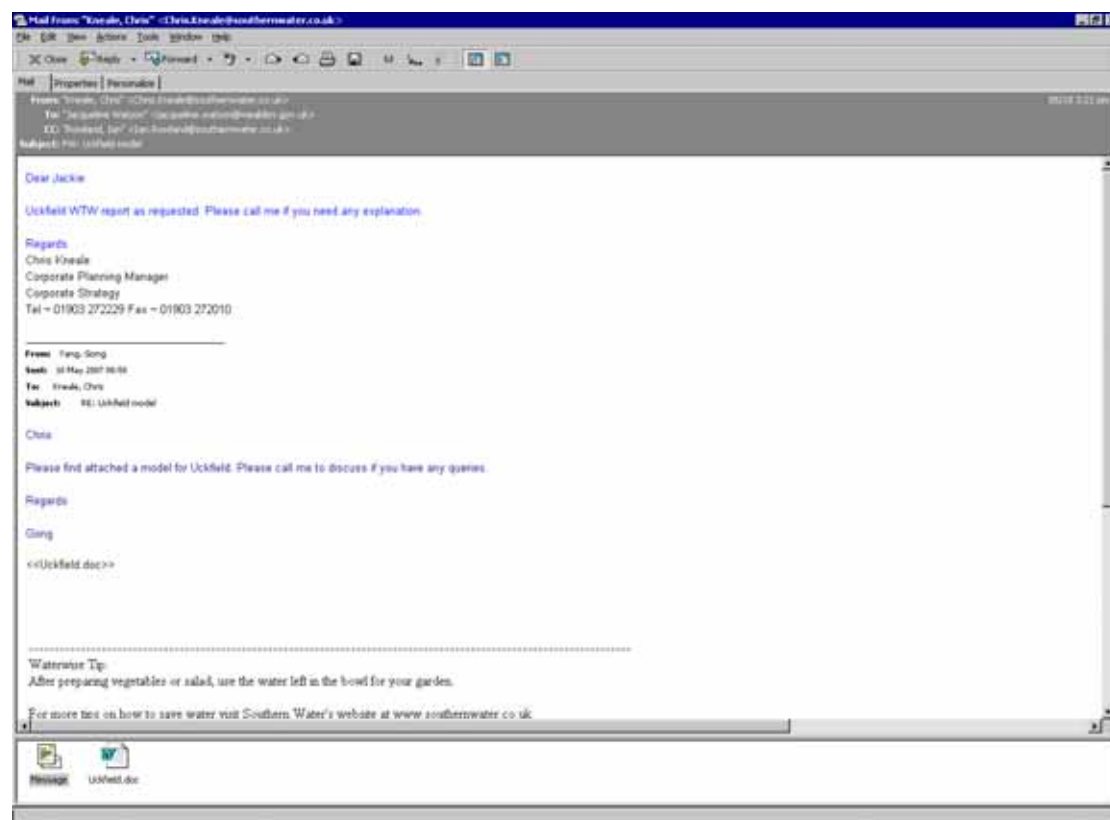
As you are aware from our discussions, future investment in infrastructure necessary to serve new development requires funding approval from Ofwat. Southern Water is required to provide evidence to support investment proposals and the LDF will be key to providing this planning certainty.

I hope the above comments are helpful, please do not hesitate to contact me if I can be of further assistance.

Yours sincerely

Chris Kneale
Corporate Planning Manager

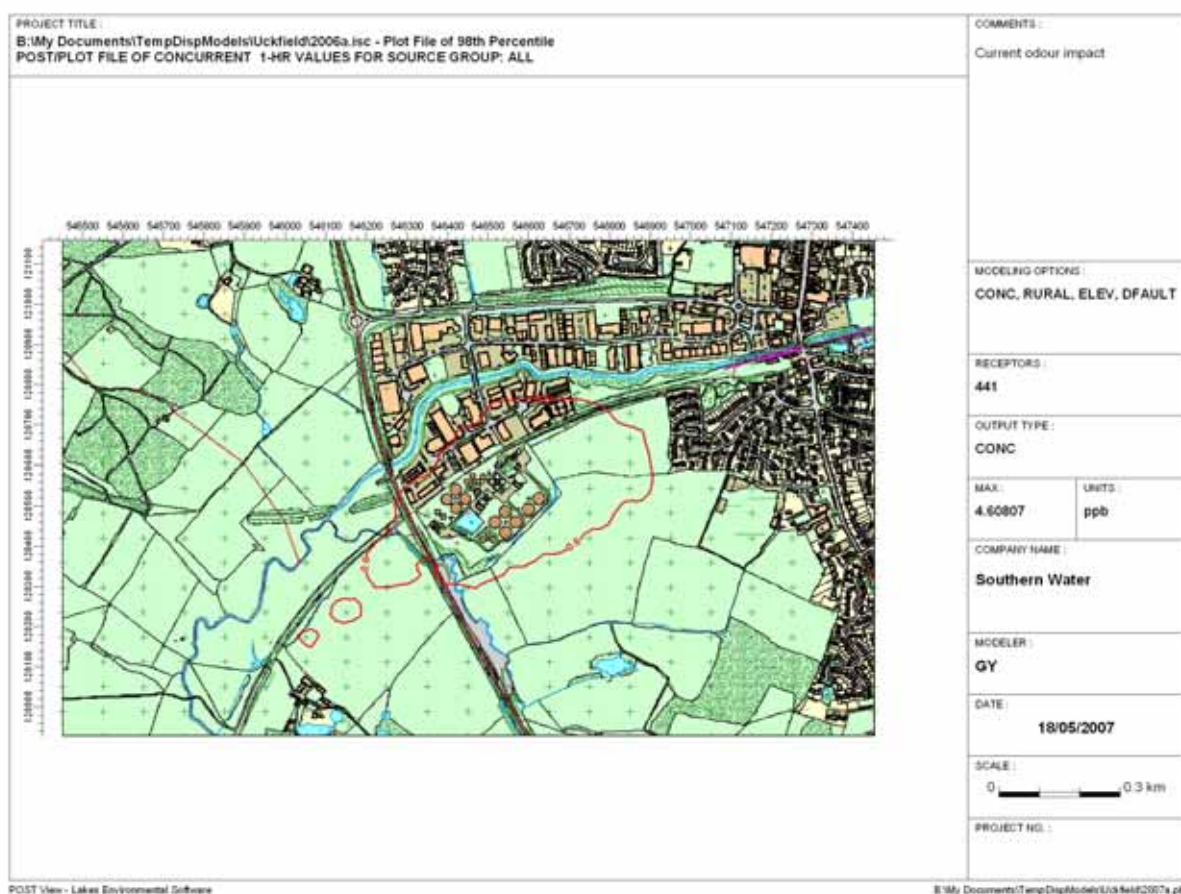
E-Mail From Southern Water Dated: 18 May 2007



Attachment:

Date	Issue No.	Revision	Author	Document Approved	Typing Layout approved	Authorised
18/05/07	1	0	G Yang			

Uckfield WTW 98th Percentile Air Quality Model



RECOMENDATIONS

The above model shows an area surrounding Uckfield WTW would be affected by H₂S related odours on a 98-percentile basis¹.

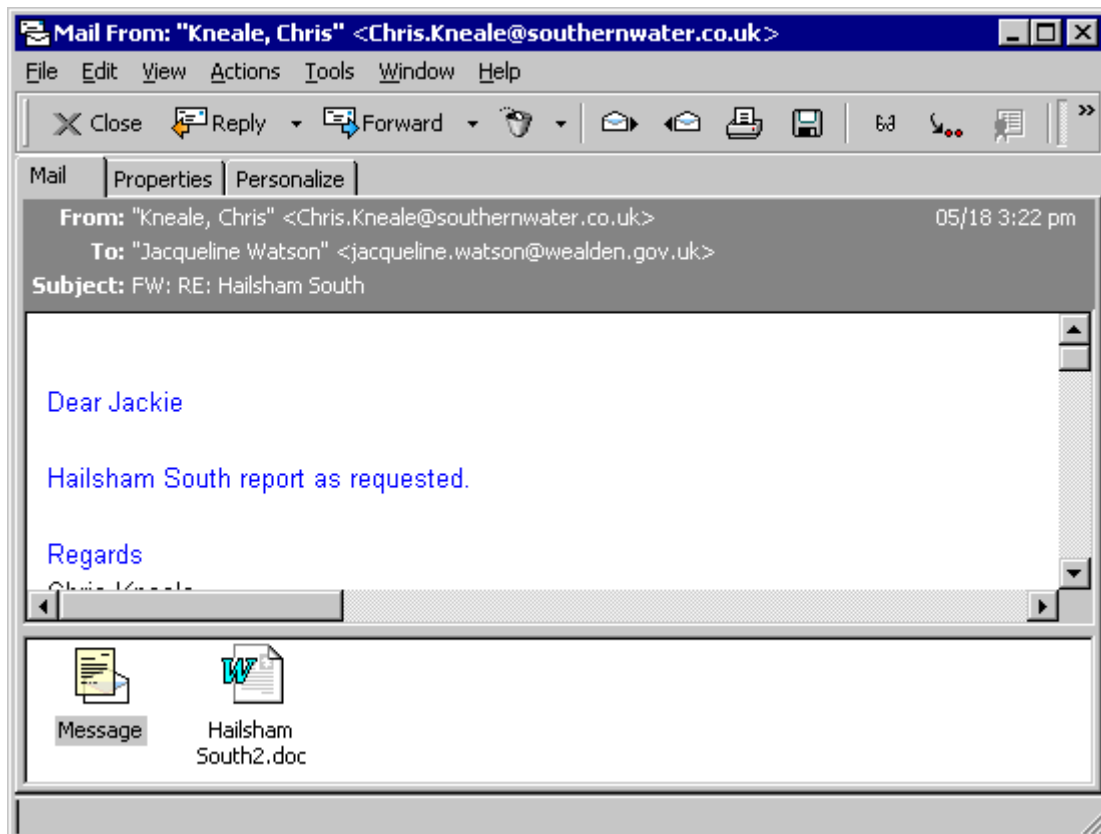
Odour was detected at some parts of the site including the inlet works, cess reception area and sludge tanker loading area. The site has not received odour complaint from local residents on the CSMS², benefiting from an existing Cordon Sanitaire to residential areas.

¹ Because dispersion models are deterministic and can only offer a mathematical representation of a statistical phenomenon, the fact that a residential house lies just outside the area predicted to be subject to an odour level of 0.6 ppb H₂S (on a 98 percentile basis) will not guarantee that property will not be subject to odours from time to time.

² Informal odour complaints were received from the industrial estate to the north of the site.

It is recommended that no new residential or commercial buildings should be developed in the areas exposed to 0.6 ppb of H₂S unless odour control at Uckfield WTW is upgraded.

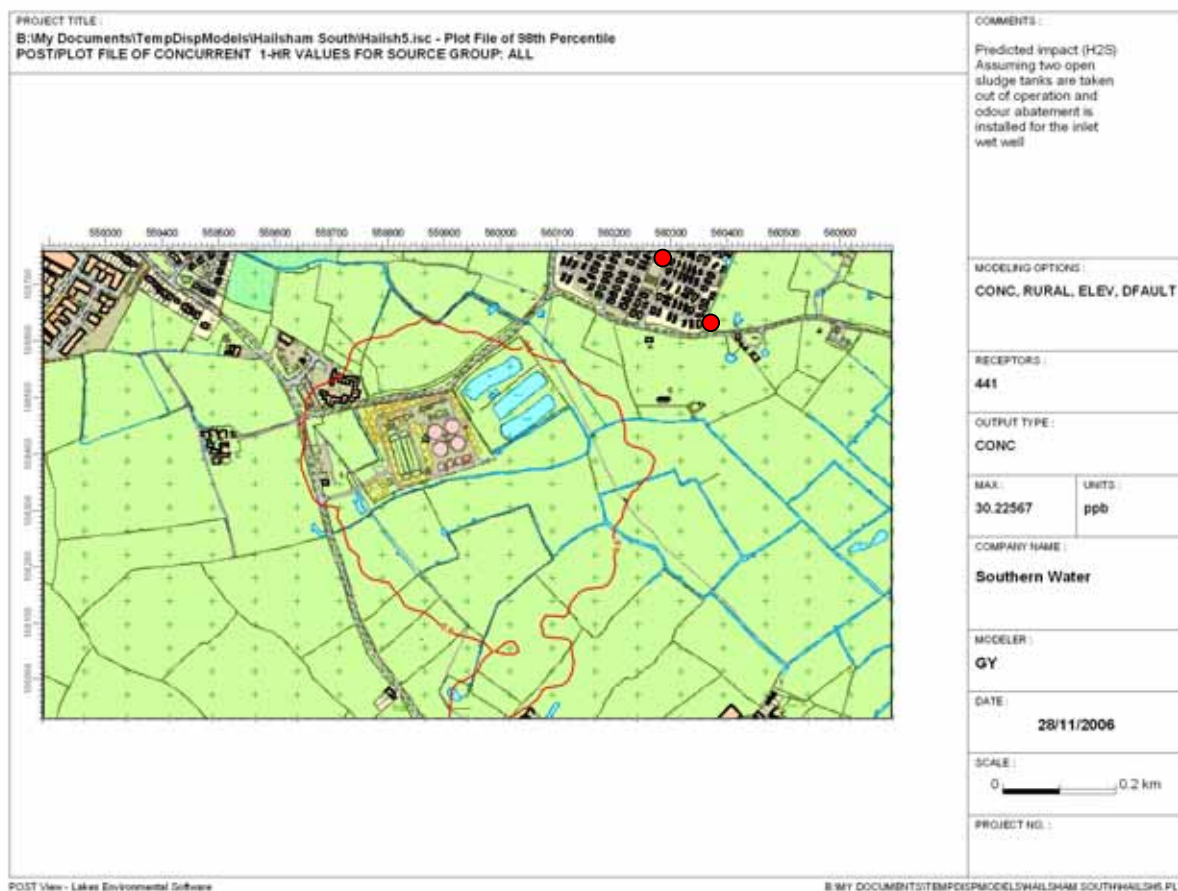
E-Mail From Southern Water Dated: 18 May 2007



Email Attachment

Date	Issue No.	Revision	Author	Document Approved	Typing Layout approved	Authorised
29/11/06	1	4	G Yang			

Hailsham South WTW 98th Percentile Air Quality Model



RECOMENDATIONS

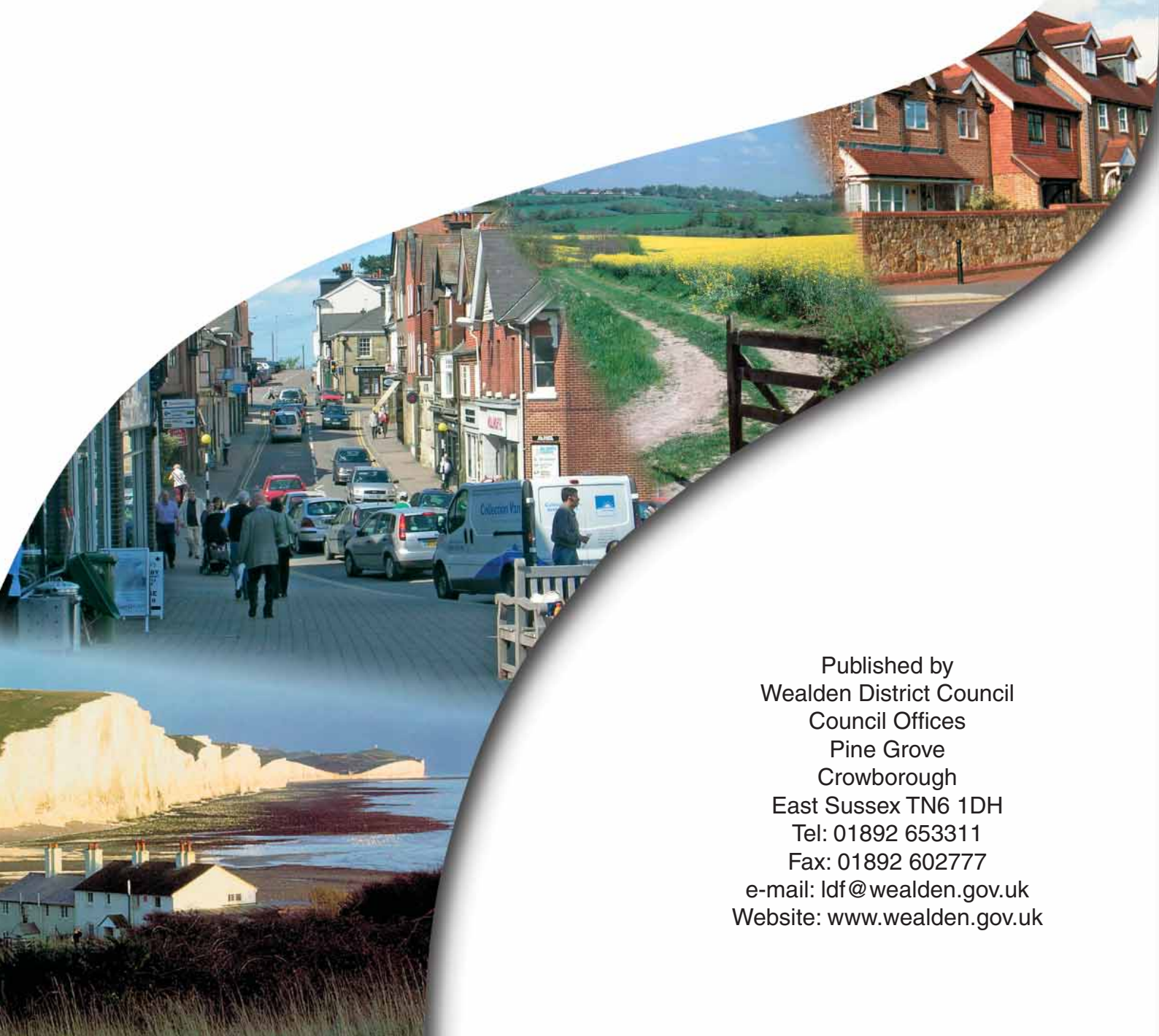
The above model shows an area surrounding Hailsham South WTW would be affected by H₂S related odours on a 98-percentile basis. This model is based on the following assumptions:

- 2 no. sludge storage tank with no cover and no odour abatement are taken out of normal operation and will be used in emergency only (This was confirmed by the site operator Colin Mitchell on 28th Nov 2006).
- It is assumed that manhole 7402, located close to the north site boundary, will be provided with odour abatement (preferably by chemical dosing at Polegate WPS or by covering, odour extraction and treatment)

There was one odour complaint in 2005 from the resident of No 3 Mill Road. There were two odour complaints in 2006 from the resident of No.127 Mill Road and No. 3 Lion House Caravan Park, Mill Road. The locations of the complaints are marked in red dots on the graph.

The fact that some planned residential houses are only 80-m from the site boundary suggests some odour complaints from these residents would be likely, however carefully the works is operated.

Because dispersion models are deterministic and can only offer a mathematical representation of a statistical phenomenon, the fact that a residential house lies just outside the area predicted to be subject to an odour level of 0.6 ppb H₂S (on a 98 percentile basis) will not guarantee that property will not be subject to odours from time to time.



Published by
Wealden District Council
Council Offices
Pine Grove
Crowborough
East Sussex TN6 1DH
Tel: 01892 653311
Fax: 01892 602777
e-mail: ldf@wealden.gov.uk
Website: www.wealden.gov.uk