Polegate and Willingdon and Stone Cross Area Strategy

a. In the formulation of the CS the Council have failed to consider the strategic advantages of Polegate as an employment location in terms of existing transport infrastructure and how this is planned to be improved.

   In Background Paper 5 at para 5.45 it was pointed out to the Council by Polegate Town Council that the location of Polegate at the junction of the A22 and A27 with a railway station junction should be taken advantage of by locating strategically important employment and civic facilities here. The CS proposal to position employment locations at limited employment sites has failed therefore to consider Polegate as a reasonable alternative and therefore the CS is consequently unsound in this respect.

b. There is no clear audit trail which has been produced by the Council to identify how the particular employment allocations were arrived at in respect of the individual settlements and no evidence as to whether any consideration has been given to that employment provision which exists, is already in the pipeline or how to ensure that choice of location and type of employment accommodation is available to ensure that entrepreneurial effort is not stifled.

   Furthermore, since the Ministerial Statement “Planning for Growth has been published the Council has not reviewed the employment land quantum and distribution and has such has failed to use the CS as an “opportunity to be proactive in driving and supporting the growth that this country needs” as required by “Planning for Growth” and as a result the distribution of the employment proposals in the CS is not justified.

c. Following the issue of the Ministerial Statement “Planning for Growth and consideration of the implications on the need to provide further land for employment uses it is considered that the land at Bramley Farm should come forward in addition to those sites already proposed in the CS for

future development for Polegate. The area identified on the attached drawing includes land which goes beyond that which will be needed for the development and it will be necessary to identify development boundaries at a later date through the Site's DPD. Without the additional employment land which can be delivered at Bramley Farm the CS is unsound as it has failed to demonstrate compliance with both the Ministerial Statement "Planning for Growth" and the South East Plan.

d. Set out below are the infrastructure requirements and delivery mechanisms required in respect of the delivery of employment development at Bramley Farm.

Transport

From the Core Strategy evidence base it can be seen that the South Wealden and Eastbourne Transport Study (SWETS) has only tested 8,000 sqm of general employment development at Polegate, whereas the Core Strategy proposes 16,000sqm. Land at Bramley Farm can accommodate at least 40,000sqm, giving a total employment land provision at Polegate, proposed in these representations, of 56,000sqm.

The conclusions (paragraph 5.3) of the three phases of SWETS modelling (Phase 1 being South East Plan requirements) show that to accommodate the levels of LDF growth proposed in South Wealden from 2009 to 2030, a range of mitigation measures will be required. Paragraph 5.4 then confirms that "*on the basis of the proposed mitigation measures it is considered that the development proposed in South Wealden could be delivered*."

SWETS tests possible new employment development at Hailsham, Polegate and Dittons/Stone Cross. Development at Stone Cross has poor access to public transport and development traffic impacts directly on the A27(T). Mornings Mill is relatively close to Polegate town centre although access by bus may not be possible (definitely not QBC) and the development traffic impacts on the critical A2270/A27 Lewes Road

traffic signal junction. Employment at Bramley Farm would have direct access onto the less constrained A22 County highway network, would have access by both pedestrians and cyclists to the town centre and would be served by buses using the high speed Quality Bus Corridor running from Eastbourne to Hailsham. As such it is a highly sustainable proposal and would have less impact on the road network than the other sites which have been tested in SWETS .

Although Bramley Farm was not specifically modelled in SWETS, we consider that once the Bramley Farm traffic is added to the model SWETS would almost certainly have come to the same conclusions (SWETS para 5.4 above). The future employees who would work at Bramley Farm have been assessed in SWETS, since their traffic impacts have been modelled as they travel to/from their houses in the new development areas. These impacts will thus be on this part of the strategic road network in South Wealden, in any event, with an additional allowance having been taken into account in the TEMPRO growth forecasts. Deliveries and business users associated with the proposed employment development at Bramley Farm would be spread throughout the working day, with delivery drivers particularly avoiding peak hours.

Access to the Bramley Farm employment area would be via a new roundabout, direct from the A22, situated approximately 0.5km north of Cophall Roundabout. Local access, for non-HGV traffic, could also be achieved to Bay Tree Lane on the southern boundary of the site and pedestrian/cycleway links can be achieved to the Cuckoo Trail on the eastern boundary of the site.

The proposed new roundabout on the A22 would only have a minor effect on traffic capacity along this section of dual carriageway. There would be a road safety benefit in respect of the long standing accident problem associated with traffic on the southbound A22 approaching the Cophall Roundabout intersection at too high speed. New bus stops for

the QBC could be provided at the roundabout adjacent to the site entrance.

Waste Water Treatment

The February 2011 Proposed Submission Document Infrastructure Delivery Plan (IDP) reports that no capacity issues are expected to arise at either of the Hailsham Waste Water Treatment Works (WwTW) from the spatial strategy proposed, however, as noted below there is a continued underestimation of the 'headroom' at the WwTW by not taking into account thewater efficiency measures which are already taking effect through amendments to the Building Regulations.

The IDP highlights that there is current headroom within the existing flow consent from the Hailsham South WwTW. The calculations within the IDP predict that this equates to a dwelling headroom of 2,400 units (January 2007). However, as of the 1st April 2010 this headroom is reported to have been reduced to 1,515 dwellings as a result of recent development and planning consents.

Notwithstanding the ongoing SW investigation into the delivery of additional development (to that within the Proposed Submission CS) in the Hailsham North and South WwTW catchments, we cannot agree with the February 2011 IDP's wastewater calculations since:

- the calculations have not considered the mandatory level of water efficiency in new dwellings as required by Building Regulations;
- the increasing requirement for even stricter water efficiency through the plan period, as anticipated in the Code for Sustainable Homes, has not been considered;
- a simple allowance for commercial foul water flows has been made rather than a relevant calculation.

Whilst water supply and wastewater generation are inextricably linked, the wastewater calculations within the February 2011 IDP do not reflect the requirement for water efficiency. Code Level 3 water efficiency measures for all new dwellings sets the usage at 105 litres/head/day (221 litres/household/day). Therefore, even with an allowance for commercial flows, the IDP figure of 500 litres/household/day would appear to significantly overestimate.

In terms of the second bullet point, the plan period extends to the year 2030 and it is anticipated that Code Level 6 will be the requirement from 2016 onwards (water usage of 80 litres/head/day) thereby further increasing the available headroom.

In terms of the third bullet point above, 16,890m2 of B1/B2/B8 floor space is proposed within the Polegate/Stone Cross area (strategic policy WCS3) and 14,880m2 of A1/B1/B2/B8 floor space is proposed in the Hailsham/Hellingly area. Using an average commercial foul flow generation figure of 400 litres per 100m2 of floor area, a specific calculation can be made. There is therefore no need to assume such a large allowance for commercial flows within the residential figures, as per the February 2011 IDP, since employment flows are small in comparison to residential flows.

The implications of the above for Hailsham South, are that if Code Level 3 dwellings were constructed the wastewater calculations in the February 2011 IDP would have been overestimated by 185% and if Code Level 6 dwellings were constructed the calculations these will have been are overestimated by 229%. Thus capacity for an additional 40,000 sqm of employment development at Bramley Farm, would be available at the Hailsham South Waste Water Treatment Works.

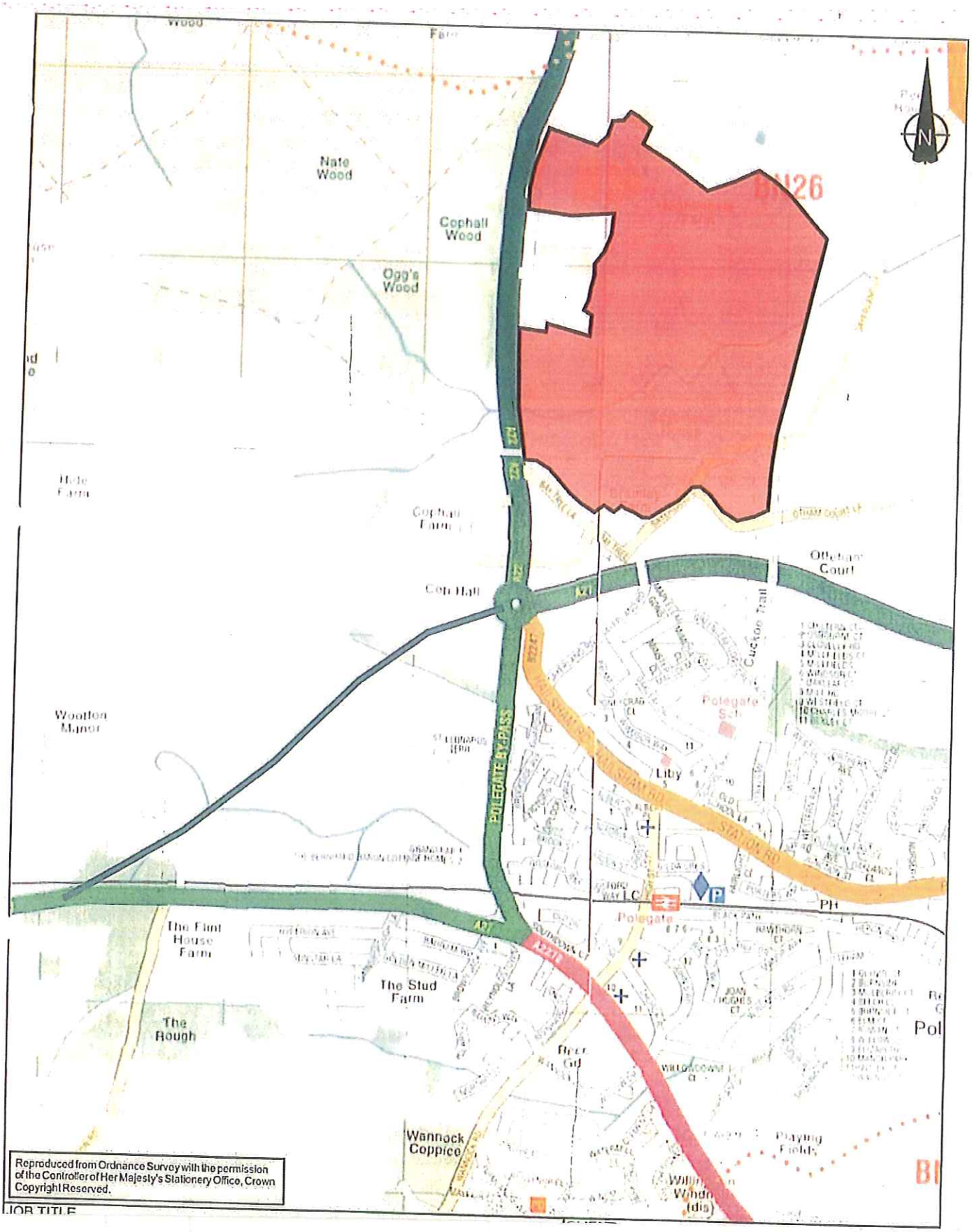
It should also be recognised that a number of the sites referred to in the February 2011 IDP, could deliver on-site waste water treatment facilities and some sites are not in the catchments for the Hailsham North and

Hailsham South WwTW. On both counts, further headroom capacity would be delivered.

Flood Risk

It can be seen from the Strategic Flood Risk Assessment, in the Core Strategy evidence base, Figure 5A the Tidal Flood Zones Map, that the majority of the Bramley Farm development area lies within Flood Zone 1 (low probability of flooding). The national policy on development and flood risk, contained within PPS25, states that all uses of land are appropriate in this zone.

From Figure 5A, a small part of the proposed development area adjacent to the Cuckoo Trail appears to be in Flood Zones 2 and 3a. Employment development is a 'less vulnerable use', as classified in Table D.2 in Annex D of PPS25, which would be acceptable in Flood Zones 2 and 3a. It is likely in any event that a large part of this area would be used for open space and swales/landscaping.


Nate Wood
Cophall Wood
Ogg's Wood
Hide Farm
Cophall Farm
Cop Hall
Ottelands Court
Woolton Manor
POLEGATE BYPASS
A27
A22
Polegate Sch
Liby
STATION RD
Polegate
The Flint House Farm
The Stud Farm
The Rough
Wannock Coppice
Playing Fields
N
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JOB TITLE