

Wealden District Council Local Development Framework

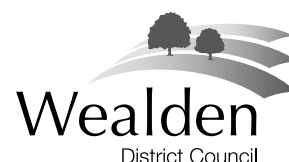
Core Strategy

Spatial Development Options Background Paper



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**Infrastructure
Position Statement**



July 2009

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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



Background

The Council has published a series of background papers to accompany the Core Strategy - Spatial Development Options consultation (July 2009). These cover a range of issues and provide more technical or detailed information than is contained in the consultation document itself. They also provide links to the various published sources of evidence on which the development of the housing and employment options has been based.

The background papers are:

1. Wealden Profile 2009
2. Housing land availability
3. Development of the strategic housing options
4. Summary guide to evidence studies
5. Summary guide to town visioning and masterplanning
6. Rural settlement classification
7. Infrastructure position statement

These background papers can be downloaded from the Council's website or are available from the Council in hard copy at a charge to cover photo copying and postage/packing.

Should you wish to make comments on the contents of this document; please write to Head of Planning and Environmental Policy, Wealden District Council, Council Offices, Pine Grove, Crowborough, TN6 1DH or email ldf@wealden.gov.uk.

1.0 Introduction

1.1 This Infrastructure Position Statement documents on-going dialogue with bodies involved in the regulation and delivery of infrastructure relevant to Wealden District and the Local Development Framework.

1.2 To ensure that the Core Strategy is ultimately sound it is important that the Plan puts forward a strategy that can be delivered. This means that the Core Strategy will need to be underpinned by evidence of: infrastructure capacity; the impact of new development on existing infrastructure; and the level of additional provision required and mechanisms which can be put in place to secure the new infrastructure at the appropriate time. It is important therefore that infrastructure providers can plan and align their own strategies and budgets to integrate with the development proposed through the Local Development Framework. This can only be achieved through the continuing development of close working relationships and an early and continued dialogue.

1.3 Following on from our issues and Options Consultation in 2007 the Council has been speaking to a number of bodies that advise on and deliver infrastructure. These discussions have focused on infrastructure needs and delivery. For the purposes of this paper these bodies will be referred to as 'Infrastructure Agencies'. This paper provides a summary of the on-going dialogue through written responses to key questions concerning:

- existing capacity constraints and planned infrastructure provision;
- the extent to which the agency can meet the capacity demands arising to 2026, from the development envisaged in South East Plan (e.g. investment strategies); and
- other relevant issues.

1.4 The South East Plan (Policy CC7) requires that *"local development documents identify the necessary infrastructure and services required to serve the area and the development they propose, together with the means, broad cost and timing of their provision related to the timing of development"*. The South East Plan defines infrastructure (page 38). The categories and types of infrastructure which will be considered as part of the Local Development Framework are shown in Appendix 1.

1.5 The Infrastructure Agencies that have been approached at this stage, and who have provided information in terms of infrastructure provision, are detailed in Appendix 2.

2.0 Summary of Infrastructure Position

2.1 Each Infrastructure Agency has provided information relating to the current situation concerning infrastructure and any known issues concerning future levels of growth in the District, as identified by the South East Plan. The following provides a summary of the responses (as agreed by the respective agency) together with a brief outline of the implications for the Core Strategy.

(A) Transport

(i) Strategic Highway Network (A27 Trunk Road) - Highway Agency (4th April 2009)

Current capacity constraints exist on the A27 to the west of Polegate, at the Cophall Roundabout and the Lewes Road traffic signalled junction.

The Highways Agency has no programmed major infrastructure improvements within the District. However, the Joint Transport Study (undertaken for the Non-Statutory Local Plan) 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 Non-Statutory Local Plan.

Improvements to the A27 to the west of Polegate are currently scheduled for 'online safety only' works, which are planned to be implemented in the period prior to 2014. However, it is likely that SEERA will be shortly withdrawing this scheme, with the intention for alternative and possibly more substantial improvements to be carried out to the A27 to the west of Polegate, in the period after 2014. Although the replacement scheme may be funded from SEERA's Regional Challenge Mapping Programme, the Highways Agency also acknowledges that developer funding may be required to contribute to the improvements.

The case for and identification of the level of improvement needed to the A27 west of Polegate to enable the development within the LDF to be delivered, needs to be made by Wealden DC as part of their evidence base for their LDF. East Sussex CC have agreed to undertake assessment work for both Wealden DC and Eastbourne BC in order to identify a joint transport strategy covering the Eastbourne-Hailsham Triangle, which would, amongst other things, make the case for improvements to the A27 west of Polegate and provide the transport evidence base for their respective LDFs. The Highways Agency is unaware of any progress to date with this study.

Once the study has been completed, the Highways Agency would support Wealden in a bid for infrastructure funding post 2014 to be submitted under SEERA's new strand of regional programmes (termed Regional Challenge Mapping). The bid will serve to replace the currently proposed 'safety only' scheme.

The proposed scheme will seek funding for improvements to the A27 trunk road to the west of Polegate but the nature and scale of those improvements will have to await the outcome of the study. It is intended that this scheme would address existing capacity issues in the locality and in addition, facilitate the delivery of future development at Polegate and Hailsham.

Wealden DC will need to fund the current transport study work being undertaken on their behalf by East Sussex CC, including work to identify the need and magnitude of any improvements to the A27 west of Polegate.

The HA does not have any funding for the financial year 2009/10 to undertake any study work to identify and progress improvements to the A27 west of Polegate. If, on the basis of the findings of the Wealden DC transport study, SEERA accept the need for a major improvement of the A27 it will be for the Department for Transport (DfT) to consider the advice provided by SEERA. If this advice is accepted by DfT they will then request and provide funding to the HA to progress the major improvement with a view to delivering the improvement, as far as is practicable, to the timescale identified by SEERA.

The transport study should look to identify and take into account all workable and deliverable measures to reduce the need to travel and the provision of alternatives to car-based travel before looking to increasing road-space capacity. The Highways Agency seek to minimise the impact of developments on the trunk roads (and local roads) by reducing the need to travel where possible, by careful planning and by the provision of alternative sustainable travel mode, by locating development in sustainable locations and by balancing housing and employment.

The Highways Agency 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.

Air Quality Management and safety issues will be an overriding importance to Highway Agency in deciding whether development locations are viable. Developments where the transport impacts cannot be satisfactorily mitigated through cost (lack of funding) or unacceptable environment impacts, will be deemed to be 'showstoppers' and their inclusion in the LDF would be resisted by the Highways Agency. The Highways Agency will not support direct access off the A27 trunk road for development sites.

The Highways Agency would be looking to the Wealden Local Development Framework 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 and to encourage sustainable travel for both new and existing development.

(ii) Non-Strategic Network - County Highways, East Sussex County Council (6th April 2009)

It remains the policy of the County Council that the A22 (and A26) as Primary Routes should principally serve as routes for longer distance traffic accessing the County from the trunk road box, i.e. the A23, M25 A21, A259 and A27.

No work has been possible on developing a structured modelling approach to the strategic distribution of development across the District/County.

Sussex Coastal towns (i.e. Hailsham and Polegate)

Growth at Hailsham or Polegate, would need 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. 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

A transport model exists for the town. The A271 is a major constraint, primarily on account of there being no conceivable on-line improvements that could overcome the fundamental issues of safety and severance.

Further growth of the town would be likely to necessitate the provision of a Hellingly/Lower Horsebridge Bypass as part of overcoming the current deficiencies of the A271. A new bypass at Hellingly/Lower Horsebridge would have 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.

Polegate

A prospective west of Polegate A27(T) 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. Transport studies indicate that, 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. Any future development around Polegate would need to provide effective walk, cycle and bus links connecting new development with the town centre and railway station.

Crowborough

The growth potential of southern Crowborough, would be dependent on the extent to which the inadequacies of Western Road can be successfully overcome. Western Road is unsuitable in respect of accommodating increased traffic demands to and from the east. In addition, there is an 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.

Uckfield

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. Recent modelling work has quantified the capacity 'headroom' of the town centre highway network as somewhere between 1500 and 2000 homes in addition to the non-statutory Local Plan allocations. Further modelling and assessment work is however needed to agree future development more precisely. On the basis of the work so far, it is not possible to suggest an optimum distribution.

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. 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.

Any further significant housing or business development within the town will 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

The town lacks the public transport connections that are necessary to cater for travel demand to destinations further a field 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. The sustainable transport potential of Heathfield is inherently less than for the coastal area towns within the District.

Investment programmes to address existing capacity issues

ESCC Funding Strategy -The County Council determines budgets annually through the Reconciling Policy and Resources (RP&R) process, and this is applicable to all respective transport delivery services, such as:

Major Schemes (over £5 million) *see below for more information*;
Maintenance; and
Integrated Transport (less than £5 million).

RP&R ensures that the County Council's limited resources are allocated as appropriate to the Council Plan Policy Steers. The process takes due regard to the priorities identified in 'Pride of Place' the Community Strategy for East Sussex, the Local Area Agreement, and the 2nd East Sussex Local Transport Plan, amongst others. In respect of Integrated Transport (schemes less than £5 million), these schemes are considered annually within an Integrated Transport Programme. Proposed schemes are subject to an assessment and are appraised against the objectives of the Second Local Transport Plan. Those schemes scoring highest, are awarded funding from the RP&R funding programme.

Major Schemes

Where the County Council is a major scheme promoter, support and associated funding is subject to three key stages, namely:

1. Prioritisation by the Regional Transport Board (via the newly named South East England Strategy Unit – formerly South East England Regional Assembly) for inclusion in Regional Funding Advice (RFA) to Government. *NB – RFA2 (which was submitted to the Secretary of State for Transport in February 2009) includes a programme of schemes to be implemented before 2014. RFA3 will be formulated in early 2011, where schemes seeking funding between 2014 – 2019 will be prioritised following Regional Challenges Mapping Work, and completion of DaSTS¹ (or equivalent) transport studies.*
2. Completion by major scheme promoter, and acceptance by Department for Transport (DfT), of Major Scheme Business Case for scheme concerned. This must include robust value for money element, with scheme demonstrating acceptable Benefit to Cost ratio, before securing programme entry.
3. For DfT to accept a major scheme for funding, the promoter must make a significant contribution to the total scheme cost (*which I understand to be 10% of total scheme cost*) and take on risk of any scheme cost increases through a 'risk layer' which is agreed with the

¹ Delivering a Sustainable Transport System, Department for Transport, November 2008

DfT. If the County Council is scheme promoter, this contribution will be subject to RP&R process.

Where applicable, the County Council will also take into consideration the availability of 3rd party contributions (e.g. Development Contributions via Section 106 agreements) as appropriate, when determining funding strategy.

Other relevant issues

The emerging Core Strategy needs 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. It would be appropriate for Transport Assessments and area-wide Travel Plans to be devised to inform any evolving development strategy. However, the County Council does not have sufficient resources at its disposal to undertake work of this nature.

It is important that any distribution of new development across the District is compatible with the current or possible future provision of attractive and viable sustainable transport alternatives to the car. Of particular importance are rail and road links serving the Sussex Coastal Towns area. There is also a need for appropriate improvements to manage the implications of the current deficiencies in the effective operation of the A27 trunk road.

Uckfield and the Sussex Coastal towns sub-area would appear to provide the best opportunities for integrated delivery of new homes with new and existing employment, and with existing and enhanced public transport and walk/cycle networks.

(iii) Rail Network - Network Rail (27th March 2009)

Existing capacity constraints to meeting the proposed growth assigned within the Regional Spatial Strategy

London-bound trains in the AM Peak are currently 40-60% loaded from Polegate. Car parking is always an issue at stations so an integrated bus service to Polegate and Eastbourne stations would be recommended. On the Uckfield route, whist demand growth has been strong over recent years there are no current capacity problems within the Wealden area. The loadings increase significantly as trains get closer to London but Wealden area passengers are not seriously affected in their journeys towards London in the morning peak. Crowding is becoming a more significant issue in the evening peak now but levels are still generally lower than the morning peak. The same applies to the route through Tunbridge Wells.

Progress on the status of proposals noted in SEERA' Regional Transport Challenge Mapping Programme

1) Willingdon Chord – the Sussex Regional Utilization Study (RUS), currently being written for draft publication in May/June 2009 has looked at this proposal and cannot find a viable business case for it. A large number of passengers travel between Hastings/Ore/Bexhill and Eastbourne. The old

alignment would require significant works as it is breached by Golden Jubilee Way (A22) requiring a new alignment to be constructed where the A22 crosses the railway line, closer to Hampden Park resulting in a severe speed restriction around the chord.

2) Additional station Polegate/Eastbourne –Of most concern is the negative impact on journey time caused by a new station stop, particularly as stations on this route are reasonably close together. Alternatives should ideally be sought, perhaps improvements to existing stations and bus links should be considered.

Track/service improvements

Some speed increases and a signalling scheme that may improve journey times. There are no significant proposals at the moment for service improvements

Accessibility improvements

Wealden District Council may wish to promote improvements to existing stations to improve local accessibility (e.g. a second entrance to Polegate station on the south-side of the railway line, to enable buses and car/taxi drop-off without using the level crossing).

(iv) Southern - Rail Service (17th April 2009)

Existing capacity constraints to meeting the proposed growth assigned within the Regional Spatial Strategy

Train service becoming much busier in recent years, resulting in trains serving the Wealden District being more crowded. Pressure points occurring at some stations from overflowing car parks.

Investment programmes to address capacity issues

Investment through the Sussex Route Utilisation Study. This study is due to be published for public consultation in May/June 2009.

Other relevant issues

The announcement of the new franchise will be made in June 2009 with the new South Central franchise commencing on 20th September 2009.

(v) Community bus services - Passenger Transport, East Sussex County Council (4th May 2009)

Existing capacity constraints to meeting the proposed level of growth assigned within the Regional Spatial Strategy

The following communities are currently serviced with infrequent bus services (*typically two hourly or less, Mondays to Fridays, including certain days of the week only*):

Nutley, High Hurstwood, Hadlow Down, Buxted, Halland, East Hoathly, Laughton, Golden Cross, Deanland Wood, Lower Dicker, Upper Dicker, Ripe, Chalvington, Arlington, Selmeston, Alciston, Berwick, Wilmington, Wannock, Jevington, Littlington and West Dean.

Investment programmes to address existing capacity issues

The County Council are currently developing Bus and Community Transport Strategies. The Community Transport Strategies will cover communities within East Sussex and will fully recognise the value of community transport services. They will aim to develop future thinking to boost provision across the County and will sit alongside and complement the new Bus Strategies. Local Councils will be consulted on the new Community Transport and Bus Strategies between May and July 2009. Final strategy documents should be produced for adoption by the County Council in September 2009.

The existing '40-plus community transport schemes', which currently operates in the County will be enhanced through the development of Parish Transport Champions. This will involve the County Council working hand-in-hand with local communities and other key partners, to identify opportunities for new or enhanced services and running pilot schemes to enable more residents to gain greater access to services.

Other relevant issues

The contracts for the operation of most of the supported local bus services in the Wealden and Eastbourne areas, along with some services in the Lewes and Rother areas, are due to change from the end of July 2009 following the expiration of the current contracts. Whilst no significant changes are expected, they have been designed to take into account the financial constraints on the County Council's budget for supported bus services.

WDC Commentary - Transport implications for the Local Development Framework

A Sustainable Transport study for South Wealden/ Eastbourne is currently at scoping stage and, when complete, will identify constraints and requirements for transport infrastructure in the Eastbourne, Hailsham and Polegate area, based on development options. This study will be used to provide evidence to support any future bid for regional funding for transport improvements, and will provide the evidence to support development of the LDF approach to developer contributions.

Further transport studies may also be commissioned for the other Wealden towns, taking into account development options.

B. Education

(i) Primary, Secondary schools and Children's Services - East Sussex County Council (1st May 2009)

Existing capacity constraints to meeting the growth assigned within the Regional Spatial Strategy (RSS)

The commentaries below reflect whether the size of the site would enable expansion of the school to increase pupil places, but the Children's Services

Authority also advise that resulting class sizes would have to be taken into account for any proposals to proceed. The information is thus for indicative purposes only. The information is presented in 3 tables -

Table 1 - Primary and Secondary Schools operating over, at or close to capacity (under 5% spare places) and site is larger than minimum requirement in Building Bulletin 99.

Table 2 - Primary & Secondary Schools where current Numbers on Roll exceed or are within 5% of Net Capacity (under 5% spare places) and site is too small (smaller than minimum requirement in Building Bulletin 99).

Table 3 - Primary & Secondary Schools where current Net Capacity exceeds the size of the site.

TABLE 1 - Primary and Secondary Schools in the District's currently operating over, at or close to capacity (under 5% spare places) and site is larger than minimum requirement in Building Bulletin 99 - Briefing Framework for the Primary School Projects and Building Bulletin 98 - Briefing Framework for Secondary School Projects .

Primary School	Status
Crowborough - town	
Sir Henry Fermor CE Primary School	Large site with possible scope for expansion
St John's CE Primary School	Site could enable limited expansion from current 1 Form Entry (FE) to 1.5 FE
Hailsham - town	
Grovelands Community School	Size is adequate for current operation at 3FE. CSA does not intend further expansion
Hawkes Farm Primary School	Site larger than needed for current 2FE, but not sufficient for 2.5 FE
Heathfield - town	
Parkside Community Primary School -	Large site has some scope for expansion but no current need
Polegate and Willingdon - town	
Willingdon Primary School	Large site with scope for enlargement
Uckfield - town	
St Philips Catholic Primary School	Large site but buildings occupy small area, which it may be possible to enlarge, depending on demand for faith provision
Rural Primary Schools	
Broad Oak Community Primary School	large site with scope for enlargement, but is Federated with Punnetts Town Community Primary School
High Hurstwood CE Primary School	large site but topography limits scope for expansion

Nutley CE Primary School	very limited scope for expansion on buildings site, and detached playing field
Park Mead Primary School	very limited scope for expansion
St.Michael's Primary School, Withyham	limited scope for expansion
Secondary School	
Uckfield Community Technology College	Main campus is too small for the current size of the college, but overall size large enough when detached playing field included . A feasibility study has recently been completed which will help inform choices for when DCSF agree entry into the BSF Programme

TABLE 2 - Primary & Secondary Schools in the District currently operating over, at or close to capacity (under 5% spare places) and site is too small (smaller than minimum requirements in Building Bulletin 99 and Building Bulletin 98).

Primary School	
Crowborough - town	
St Mary's Catholic Primary School	Only just smaller, but no scope for enlargement, and no need perceived to expand on current forecasts
Hailsham - town	
Hellingly Community Primary School	Current site too small for current size of school
Rural Primary School	
Danehill CE Primary School	site is already too small for current numbers and no playing field.
Blackboys CE Primary School	site is already too small for current numbers.
Framfield CE Primary School	site is already too small for current numbers and no playing field
Little Horsted CE School	site is already too small for current numbers.
Frant CE Primary School	one of the smallest school sites, yet popular and within 1% of capacity. Likely to be replaced on a new site. No playing field.
Groombridge St.Thomas' CE Primary School	site is already too small for current numbers.
Hankham Primary School	site is already too small for current numbers. Has been flagged up for modernizing when funds allow.
Herstmonceux CE Primary School	site is already too small for current numbers, no playing field (uses Recreation ground).
Laughton Community	site is already too small for current numbers.

Primary School -	
Mark Cross CE Primary School	site is already too small for current numbers.
Mayfield CE Primary School	site is already too small for current numbers.
Ninfield CE Primary School	site is already too small for current numbers and no playing field.
Pevensey and Westham CE Primary School	site only just smaller than needed for current numbers.
Rotherfield Primary School	site is already too small for current numbers and no playing field
St.Marks CE Primary School, Hadlow Down	site is already too small for current numbers
Stone Cross School	site is already too small for current numbers
Secondary School	
Heathfield Community College	site already too small for the current size of the college. A feasibility study will be required to inform choices for when DCSF agree entry into the BSF Programme.
Uplands Community Technology College	site is already too small for the current size of the college, but extra land is likely to be acquired. A feasibility study has recently been completed which will help inform choices for when DCSF agree entry into the BSF Programme.
Willingdon Community School	site is already too small for the current Net Capacity. A feasibility study has recently been completed which will help inform choices for when DCSF agree entry into the BSF Programme.

DCSF Building Table 3 - Primary & Secondary Schools where current Net Capacity exceeds the size of the site Bulletins 98 and 99² published in recent years, include new minimum site sizes based on the number of pupils, which in turn is determined by the Net Capacity of the premises. The following schools are where existing site sizes are therefore below those needed for the current Net Capacity, even though they may have surplus places at the time of writing.

Primary School	
All Saints' and St Richard's CE Primary School - Heathfield	Site is just short of required size
Alfriston School	Site is around 50% of required size and no playing field
East Hoathly CE Primary School	Very small site, but land option from

²Building Bulletin 98 - Briefing Framework for Secondary Schools Project, Department for Children, Schools and Families, (DCSF) November 2004; Building Bulletin 99 - Briefing Framework for Primary Schools Project, (DCSF) November 2006

	developer will enable to site to be increased, but will still be below required size
Fletching CE Primary School	Very small site and no playing field
St.Mary the Virgin CE Primary School - Hartfield	area for buildings adequate but lacks playing field
Cross in Hand CE Primary School	Site approximately 75% required size
Punnetts Town Community Primary School	Site is around 50% of required size because of no playing field (note, Federated with Broad Oak Community Primary School)
Five Ashes CE Primary School	Very small site and no playing field
Secondary School	
Hailsham Community College	Site already too small for the current size of the college. A feasibility study has recently been completed which will help inform choices for when DCSF agree entry into the BSF Programme

Investment programmes to address existing capacity issues

The County Council's Capital Programme (agreed January 2009) contains investment proposals on a rolling basis, ranging from minor works through to modernizing and replacement of schools, as well as providing additional temporary and permanent accommodation. The funding for these proposals is anticipated from a variety of sources including Department for Children, Schools and Families (DCSF), Development Contributions, and rate-borne.

Also for the first time the authority's initial proposals under the Government's Primary Capital Programme (PCP) and main Building Schools for the Future (BSF) programme are shown. Both these programmes are not just about replacing or refurbishing schools, but are driven by the need to transform learning, and will also enable the opportunity to reconsider the organization of schools including their size and location. There is also indicative funding for the first two Academies in East Sussex, which are intended to replace three secondary schools in Hastings. The DCSF expects local authorities to join up its own funding streams together with those from other bodies, including the provision of co-located community facilities, so the details for each individual scheme can be complex.

Primary Capital Programme (PCP). Funding for Year 1 projects has been approved, and these are currently being worked up to planning application stage (none of these are in Wealden). A revised strategy has been approved by the DCSF. Approval of the revised strategy and Year 2 funding, includes a proposal to replace the school in Frant (on a new site). Work is being undertaken on investment proposals beyond Year 2, but has not yet been agreed, because which schools will be included is dependant upon the strategy and the mix of assessment criteria (deprivation, standards, condition and suitability) being approved.

Building Schools for the Future (BSF) programme. The original DCSF plan placed East Sussex in the last 'waves' of the 15-year programme. However in 2007 DCSF agreed that the County Council could have a "One School Pathfinder" project under the programme. The replacement of Bexhill High School was chosen as the project, and the new school is currently under construction.

In 2008 DCSF has offered some authorities the opportunity to gain accelerated entry into the main BSF programme, also known as "dewaving". The County Council is currently in discussion with Partnership for Schools (PfS), the government's delivery arm for BSF, about this. The earliest point of entry as stated by PfS is the Financial Year 2011/12 but this is under review. It would most likely be around another 4 years after entry before the first project was completed.

ESCC has therefore prepared an indicative local programme, and Uckfield Community Technology College, Uplands Community College and Hailsham Community College feature in the second batch of schools. Currently there are building Options Appraisals being completed for these schools. The third batch features both Willingdon Community School and Heathfield Community College, with Beacon Community College featuring in the fourth and final batch. This programme is still indicative, and the exact scheme for each school (whether rebuild or refurbishment) has still to be agreed.

School Projects outside of PCP and BSF

Also although DCSF have announced PCP as an overall 15-year programme, they only intend that 50% of all primary schools will be included, with a mix of rebuild and refurbishment. The County Council is therefore having to consider the needs of schools that will fall outside PCP. There will also be some secondary schools that will fall outside of BSF, and the County Council is therefore having to consider their needs from other funding.

Finally the needs of Special Schools also need to be taken into consideration, and it is intended to include those catering for pupils of secondary age within the BSF programme. Currently DCSF do not allow Special Schools catering for primary-age pupils to be included within PCP, so their needs will have to be addressed by other means.

Children Services other than schools

There are also non-schools projects reflecting the wider remit of the Children's Services Authority compared to the previous role as Local Education Authority. For example this now encompasses responsibility for children's homes, respite centres, children's centres, early years facilities and youth services. All of these have accommodation needs that will change during the lifespan of the LDF. ESCC are currently undertaking an annual review of Service Asset Management Plan (SAMP) which will encompass adding in new forward planning proposals (e.g. the next phase of the Children's Centres Programme). The SAMP is currently being drafted.

Other relevant issues

Capacity information for NEW SCHOOLS

	Primary School (4-10 age range)	Secondary School (11-16 age range)
Minimum Forms of Entry each year	One	Six
Number of pupils resulting from the above	210 (7 years x 30)	900 (5 years x 180)
Approximate scale of development that equates to number of pupils	1000 dwellings	5000 dwellings
Optimum size: Forms of Entry	Two	Eight
Optimum size: Number of pupils	420 (7 years x 60)	1200 (5 years x 240)

The latest pupil forecasts are indicating that the past decline in Primary Rolls will come to an end in academic year 2009/10 and there will be a rise in pupil numbers until around 2016/17. Secondary numbers are forecast to decline until around 2016/17 and then rise again in the following years. There are likely however, to be significant spatial variations across the District within the overall picture. This will in turn depend to a large extent on where future new housing goes.

WDC Commentary - Education implications for the Local Development Framework

Wealden District Council is continuing an on-going dialogue with East Sussex County Council as Local Education Authority in terms of future infrastructure provision. East Sussex County Council is currently undertaking modelling based on the options contained within the Spatial Development Options Consultation Document. The results of this, and the continuing dialogue which will seek to refine options, will feed into the preferred development strategy for Wealden's final Core Strategy document.

C. Health Care -

(i) Strategic Health Care -South East Coast Strategic Health Authority

Considered that the Primary Care Trust (East Sussex Downs & Weald Primary Care Trust) are the most appropriate Trust to input information regarding Infrastructure capacity, constraints and future provision.

(ii) Local Health Care - East Sussex Downs & Weald Primary Care Trust

The PCT has a commissioning role in providing health care for local communities. They are responsible for:

- contracts with GP's
- contracts with dental services
- contracts with pharmacists
- contracts with Sussex; Tunbridge Wells & Maidstone and Brighton University Hospital Trusts

Existing capacity constraints to meeting the proposed growth within the Regional Spatial Strategy

Primary Care

The existing network of Primary Care facilities provides General Medical Services to meet the needs of the current population. Much of that network has been in existence for a number of years and was built to different standards than exists today. 80% of the present facilities are considered too small to meet the demands of modern service provision. It follows that any significant increase in local population resulting from the house building programme will have a noticeable impact on the capacity of our current estate.

Because of the rural nature of much of the Wealden area the PCT assesses capacity on a community basis and so the location of land allocated for house building is of great importance. Where we are currently planning to provide new Primary Care buildings we try to include an ability to increase capacity to respond to future building programmes. It is almost impossible to build capacity now that may not be needed until the end of the South East Plan period but we can design buildings with future expansion in mind.

The most difficult pattern of land allocation for building would be to create small developments over a wide area. This could place demands on our smaller surgeries and result in a series of small expensive expansion projects. Our preference would be to site the bulk of developments around the larger communities where we can concentrate our resources in creating larger Health Centres. This will enable us to replace some of our inadequate buildings with modern facilities capable of dealing with increased population.

Secondary Care

There are no large hospitals in the Wealden area and our patients always have to travel to adjoining areas to receive Secondary Care. There will obviously be an impact on capacity but this needs to be taken into account in the context of the wider South East Plan and not just the Wealden area.

The local Community Hospitals at Crowborough and Uckfield already operate near their full capacity and continued expansion of local population will add to the pressure on those resources.

There will also be pressure on Community Nursing services. The provision of care in this sector will also be influenced by the age breakdown of the population. In turn this will be affected by the nature of the houses being provided and early knowledge of the demographic breakdown will help in the planning of these services.

Investment programmes to address existing capacity issues

The PCT is currently defining its Estate Strategy and the document will be available later in the Year. Our investment programme currently deals with existing inadequacies in provision whilst providing some additional capacity. (The new Meads Surgery building will replace an old existing building and provide space for about another 1,000 patients.) There are also new surgeries being considered in Buxted and East Hoathly.

Our investment strategy to some extent is reactive to the external demands placed on it by changes in the local population and so greater clarity in Wealden's plans is an essential element on forming that strategy.

Other relevant issues

Probably not part of the Local Development Framework but we need to give early notice of the need to have provision of a reasonable level of Developer contribution. Section 106 agreements do provide a method of securing some contribution to infrastructure but the current system is not robust. Because developments will take place over a period, a mechanism needs to be provided that will gather contributions and pay them over as facilities are provided. For the PCT the sums are not insignificant. Our current calculation indicates that a contribution of £500 per unit is needed; this is a total of £4M for Wealden alone.

(iii) Royal Sussex County Hospital (Brighton) and Princess Royal Hospital (Haywards Heath) - Brighton and Sussex University Hospitals NHS Trust (20th March 2009)

Existing capacity constraints to meeting the proposed growth within the Regional Spatial Strategy

The role of the Royal Sussex County Hospital (Brighton) as the critical care hospital for the south east coast was confirmed in 2007 in the 'Fit for the Future' service model. This model also concluded that Accident & Emergency services and acute medical admissions should be maintained at Princess Royal Hospital (Haywards Heath) and other acute hospital sites in Sussex. Maternity services will also be retained on both sites for the foreseeable future.

By 2012 all our specialties and services will be performing in the top quartile for hospitals in England Wales.

Investment programmes to address existing capacity issues

A Strategic Outline Case was approved on 3rd June 2008. The Strategic Outline Case (SOC) is the first formal step in the NHS process for obtaining capital development funding. The SOC presents a single proposal for investment that integrates new proposals for major trauma and secondary care provision with earlier proposals for capital investment in Cancer and Neurosciences. The SOC sets out proposals for improving patient access and clinical outcomes in both tertiary and secondary care.

Other relevant issues

Brighton & Sussex University Hospitals NHS Trust comprises the Royal Sussex County Hospital campus in Brighton (which includes the Royal Alexandra Children's Hospital, the Sussex Cardiac Centre, the Sussex Cancer Centre and the Sussex Eye Hospital) and the Princess Royal Hospital campus in Haywards Heath (which includes the Regional Centre for Neurosciences). It also provides services from a number of community based sites, including the Victoria Hospital in Lewes and Brighton General Hospital.

(iv) Eastbourne District and Conquest (Hastings) Hospitals - East Sussex Hospitals NHS Trust Hospital

Existing capacity constraints to meeting the proposed growth within the Regional Spatial Strategy

The Trust's long term services strategy has incorporated known forecast population growths including those highlighted within the South East plan. At present, it is envisaged that the acute provision from Eastbourne District General Hospital (which services the majority of the Wealden area) can be adapted to meet future needs.

An assessment of the impact of additional growth is often dependent on the demographics of the population profile. In particular there is significant evidence to show that the older the population, the more likely they are to require access to healthcare.

Investment programmes to address existing capacity issues

There are no specific investment programmes within the Trust's strategy linked to the expected increase in housing within the Wealden area.

Other relevant issues

Eastbourne District General Hospital is accessed by patients from Wealden and to a lesser degree, patients can also access healthcare at the Hastings site (Conquest Hospital). Patients from Wealden can also access healthcare with other providers in Brighton, Tunbridge Wells or London.

(v) Existing and new Pembury Hospitals, Tunbridge Wells- Maidstone & Tunbridge Wells NHS Trust (20th March 200)

Existing capacity constraints to meeting the proposed growth within the Regional Spatial Strategy

The Trust have assumed that in the Wealden catchment for the Trust (Crowborough, Wadhurst and Heathfield and to a limited extent Uckfield) a level of 2,000-2,500 new homes is not unreasonable. Given a catchment of 500,000 people currently, we do not see this as significant. The pressure points for healthcare will undoubtedly be births, paediatrics and care for the elderly population and it is not possible to predict this other than by ONS demographic data. Assessing population by housing numbers is not reliable.

Investment programmes to address existing capacity issues

The Trust has a number of options for increasing capacity at the new hospital. These include greater use of outpatients for procedures previously carried out in operating theatres (and hence needing to admit patients), 23 hour surgery, the provision of shell space for diagnostics growth and several build options at the new hospital to provide additional ward space should this be required.

Other relevant issues

The new Pembury Hospital at Tunbridge Wells is scheduled to open in two phases;

Phase 1a (Women's and Children's Zone) is scheduled to be open to patients in January 2011.

Phase 1b is scheduled to open in July 2011 and will involve the move of services from the remainder of the Old Pembury Hospital; services from Kent and Sussex Hospital and any services from Maidstone Hospital that are already planned to be consolidated into the new hospital e.g. Women's and Children's. At this point, the acute Kent and Sussex site will be closed and the site redeveloped.

The planning of the new hospital was undertaken jointly with the local PCTs and is based on 'acute work only' therefore successful operation of the new hospital will depend on sufficient capacity in the community to ensure that the agreed acute services will operate from the new hospital and this is currently being planned in detail.

(vi) South East Coast Ambulance Service NHS (18th February 2009)

Existing capacity constraints to meeting the proposed growth assigned within the Regional Spatial Strategy

The increase in population outlined in the Regional Spatial Strategy (South East Plan) will impact on the need for response and standby posts along the south coastal belt. Increased road congestion will have the effect of increasing response times and reducing clinical outcomes. In respect of changing patterns of primary care, the planned introduction of polyclinics may be perceived by the population to represent a reduction in local services. Based on historical trends, if the population perceive that they are medically underserved, they are likely to turn to the ambulance service as an entry point to the NHS, increasing demands on the ambulance service.

Investment programmes to address existing capacity issues

The Estate Strategy (2008-2012) proposes a move to a Depot based model of service delivery, moving away from traditional ambulance stations to a matrix of response and standby posts. The strategy proposes new depot locations. Whilst the locations of the new depots are yet to be identified, it is not anticipated that any new depots will be located within the district of Wealden.

WDC Commentary - Health implications for the Local Development Framework

Wealden District Council will await the response from the Health Authorities in relation to the Spatial Development Options consultation paper and continue a dialogue in order to refine options and ensure the timely provision of local health infrastructure across the District, in line with the selected development strategy.

D. Public Services

(i) Sussex Police (27th March 2009)

Existing capacity constraints to meeting the proposed level of growth proposed within the Regional Spatial Strategy

New provision for police premises would only be required if planning decisions were to result in the significant enlargement of a small village (not close to a town) up to a 'town' size or a new town is created. If development is located in or near to large conurbations; placed near strategic road links or if developments are small but spread throughout the district, there will be little impact.

Investment programmes to address existing capacity issues

There are no capital plans at this time to increase the police estate within Wealden District.

Other relevant issues

With the development of neighbourhood policing we are keen to station officers in remote locations, ideally this should be a consideration under s106 legislation for a specific police premises, house or office within a community building.

Police resource allocation is determined by a number of factors. In relation to 24/7 emergency and non-emergency activity, the key factor is the crime level, with the additional factors of incident rate and scarcity taken into account. Neighbourhood policing allocation reflects the number of neighbourhoods (in Wealden District Wards), levels of deprivation with crime and incident data as a lesser influencing factor.

(ii) Sussex Fire and Rescue Service- Fire and Rescue (18th February 2009)

Existing capacity constraints to meeting the proposed growth assigned within the Regional Spatial Strategy

Uckfield - the existing fire station is located in a flood plain. There are no flood prevention works planned by the Environment Agency and therefore, options for relocation are required. The relocated fire station must be located within close proximity to the main residential areas of Uckfield, to enable a 5 minute 'travel time' to be achieved for employees and retained fire-fighters.

The costs of a new site would be in the region of £2 million build cost (excluding land cost).

Polegate and Hailsham - whilst the current location is ideally suited to be accessed by employees and retained fire-fighters, any extensive residential development in Hailsham and Polegate would lead to the need to relocate the existing fire station. A relocated fire station would require a site area of approximately 2000 square metres and a fire station developer contribution of approximately £2 million. If this cannot be maintained, East Sussex Fire and Rescue Services would have to consider other and more expensive staffing options.

Investment programmes to address existing capacity issues

There is no specific funding provided to address increasing populations other than the increasing Council Tax Precept, which would hopefully cover the running costs of additional facilities and services to cover such growth.

(iii) Household and Business Waste - Minerals and Waste Division, East Sussex County Council (8th April 2009)

Existing capacity constraints to meeting the growth assigned with the Regional Spatial Strategy

A demand study is currently being undertaken within the preparation of the Waste and Minerals Core Strategy, to establish the capacity at existing sites to manage municipal waste and commercial waste in the future. The existing sites within Wealden are as follows:

Household Waste Sites: Faircrouch Lane, Wadhurst; Farningham Road, Crowborough; High Street (Mobile, Car Park), Uckfield; Off A265, Heathfield; Station Road, Forest Row; and Station Road, Hailsham

Scrap Metal Facilities: Elm Field, Saltmarsh Lane, Hailsham; Hazelmere, Punnets Town, Heathfield; and Diplocks Way, Hailsham

Waste Transfer Stations: Cophall Wood, Nr.Polegate; A.M.Plant and Skip Hire, Hazelbank, near Maresfield; Potts Marsh WTS, Industrial Estate, Westham; Rock Robin Scrap yard, Three Oaks Lane, Wadhurst; Skilton Skips, Rose Cottage, Blackness Road, Crowborough; and Plot 1, Diplocks Way, Hailsham.

Waste Water Treatment Works (serving the District's 5 towns): Hailsham South, Station Road, Hailsham; Redgate Mill, Beech Pit Lane, Rotherfield; Cowbeech Pumping Station, Hailsham; and Hailsham North, Harebeating Lane, Hailsham; Uckfield, Bridge Farm Road, Uckfield; and Vines Cross, Heathfield.

Liquid Waste spreading on agricultural land: Flitteridge Farm, Fletching

Material Recovery Facility (MRF): Bellbrook MRF, Bellbrook Industrial Estate, Uckfield

Green Waste Composting: Boathouse Farm, Isfield

Investment programmes to address existing capacity issues

The County Council are in the process of preparing a Waste and Minerals Core Strategy. The initial Issues and Options document has already been published and undergone statutory public consultation. An informal consultation is anticipated to take place on the preferred strategy document in September/October 2009. It is intended that the proposed submission document will be published for comment in February/March 2010, with formal submission to the Secretary of State in June 2010. Public Examination is anticipated in September 2010 and adoption in January/February 2011.

The emerging Waste and Minerals Core Strategy is intended to address the broad, strategic-level issues and options. Matters of detail, including the precise locations of sites for all types of waste and minerals development, are an issue for other, more detailed development plan documents. The Waste and Minerals Core Strategy will guide the future work of allocating suitable sites which will then appear in a separate 'Waste Sites Development Plan Document' (DPD). The preparation of the Waste Sites DPD will, therefore, follow on from the preparation of the Core Strategy and will undergo a similar process of public consultation and stakeholder involvement leading to a separate examination by the Planning Inspectorate

WDC Commentary - Public Services implications for the Local Development Framework

It will be necessary to ensure that all public services are aware of the development, refinement and the ultimate choice of preferred option, to ensure that any implications may be considered as part of the service providers' plans or strategies. Further discussion will be required with public service authorities, including the Fire and Rescue Service so as to quantify growth required for a new Station for Polegate and Hailsham and any implications the Local Development Framework may have to the Station at Uckfield.

E. Utility Services

(i) Water Supply - South East Water (6th April 2009)

Existing capacity constraints to meeting the proposed level of growth assigned within the Regional Spatial Strategy

As part of the water resource planning process, the growth proposed by the South East Plan will be factored into South East Water's 25 year demand forecasts. As a consequence, new water resources along with water efficiency and management measures, may be required. South East Water will seek to address this deficit through a twin track approach of demand management measures and new resources. However, the lead-in time for major resource schemes (when required) is significant and the planning system can present a

significant hurdle. This is factored into our planning by providing realistic long-lead in times to our proposals

Investment programmes to address these capacity issues

Water Companies in the UK have a duty to maintain the security of their water resources and as part of this statutory duty are required to plan carefully for the future. This is achieved principally through the production of Water Resource Management Plans (WRMP). These Plans set out forecasts of supply and demand over a twenty-five year horizon. They also explain how companies intend to provide sufficient water to meet their customer's needs, while protecting the environment. Plans are formally reviewed every five years.

The Draft Water Resources Plan

South East Water plans its water resources 25 years in advance. This 25-year-plan is under constant review and ensures that 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 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. The preparation of the subsequent plan is underway (PR09 Water Resource Plan), which will cover the period 2010-2035. The South East Water Draft Water Resource Management Plan was published in May 2008. It is noted that Wealden District Council made a valuable and detailed consultation response to the draft plan in July 2008. In January 2009, South East Water published its Statement of Response to those who made representation upon it's draft WRMP. The statement of response reflects South East Water's Final WRMP proposals. The company must now await Defra direction, prior to publishing its Final Plan (earliest date will be early 2010)

Proposals for Wealden in the Draft Water Resource Management Plan 2008 (to cover period 2010-2035)

Wealden District is situated within Resource Zone 2 and Resource Zone 3. The Draft Water Resource Management Plan indicates that the preferred option is to make use of inter-resource zone transfers and small improvements to existing works in the short term in Resource Zone 2. Following refinement between the draft WRMP and Final WRMP, further resource development will be required. From 2020, the favoured option is the development of further winter storage in the Ouse catchment to support both Resource Zones 2 & 3

One possible option is to raise Bewl Reservoir in 2026. South East Water were granted funding by OFWAT to investigate the feasibility of the Clay Hill scheme against other options. South East Water considers the outcome of

these investigations to continue to support winter storage as the most sustainable long term solution. It is essential the South East Water completes further work on the alternative options before a firm conclusion is made.

Other relevant issues

Water supply Wealden 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, located on the River Ouse to the north of Lewes. The northern part of the District is served by Groombridge Water Treatment Works, located on the Kent/Sussex border.

It should be understood that water planning is not undertaken on a District by District basis. 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 that there is sufficient water within the supply network

(ii) Regulator of wastewater, water supply, biodiversity and green infrastructure - Environment Agency (10th March 2009)

Existing capacity constraints regarding Water Resources, to meeting the growth assigned within the Regional Spatial Strategy

The whole of the South East is identified by the Environment Agency as an area of 'Water stress'. This term is based on the rainfall being particularly low compared with the rest of the country and the population being particularly high.

The Catchment Abstraction Management Plan shows that there are two distinctions within Wealden. The central and northern sections of the District are being 'over licensed' which means that the levels of current water abstraction results in there being no water available at low flows. The rest of the area is defined as having 'no water available'. This means that there is no water available for further licensing at low flows.

Investment strategies to overcome identified capacity constraints, not to be undertaken (but regulated) by Environment Agency

Environment Agency take the position that in the Southern Region (as a minimum requirement), homes built before 2016 should achieve internal water use of 105 litres/head/day (as required by Code for Sustainable Homes (CSH) level 3), moving to 80 litres/head/day (CSH level 5) after 2016. The Environment Agency will be supportive where a developer or local authority wish to aim for lower water use.

(iii) Wastewater Treatment - Southern Water (16th April 2009)

Existing capacity constraints to growth assigned within the Regional Spatial Strategy (RSS)

The Environment Agency issues wastewater discharge consents which are set to meet environmental quality standards in the receiving water. Southern Water is not permitted to discharge effluent in excess of the consented dry weather flow (DWF) or breach the required quality standards.

Hailsham North and South Wastewater Treatment Works - WTW (serves Hailsham, Chiddingly, Hellingly, Polegate and Jevington settlements)

Two WTWs are located at Hailsham. Hailsham North serves approximately one third of properties located within the north of Hailsham (together with Chiddingly, Hellingly and Lower Dicker). Hailsham South currently serves approximately two thirds of properties located within the south of Hailsham (together with Polegate and Jevington). Both of the WTWs at Hailsham treat wastewater to the highest standards available nationally before the effluent is discharged to the Pevensey Levels. The Environment Agency has advised Southern Water that it will not be permitted to increase the effluent load discharged above that currently consented because of environmental constraints.

The Environment Agency has recently re-assessed available headroom and has estimated that there is capacity for a higher number of households to connect than previously anticipated within their report '*Creating a Better Place: Planning for Water Quality in the South East*' 2007. The original and revised maximum capacities are shown in the table below (rounded down to the nearest 100). The table also shows existing treatment capacity at each WTW, and the capacity which is taken up by new development coming forward from the Non-Statutory Local Plan (i.e. homes not yet built).

Catchment	Assessed maximum number of households that can be connected [Note 1]	Revised assessed maximum number of households that can be connected [Note 2]	Existing treatment headroom (households)	Headroom taken up (households)
Hailsham North	2,700	2,900	1,400	1,372
Hailsham South	1,900	2,400	2,400	1,347
Total	4,600	5,300	3,800	2,719

Note 1: Source: EA Report "*Creating a Better Place: Planning for Water Quality in the South East*".

Note 2: Source: EA revised assessment, April 2009. Figures rounded down to the nearest 100.

The provision of further housing and business development in the Hailsham, Polegate and Willingdon areas (resulting in additional homes above the

existing EA discharge consents), will not be able to be accommodated without the location of an alternative site for discharge of treated effluent; the associated infrastructure receiving the required planning and discharge consents and the infrastructure constructed. This may require the provision of a new wastewater treatment works site. Based on experience elsewhere, it could take until 2015 to obtain the required planning and environmental consents. Construction could follow in the period from 2015.

Uckfield WTW (serves Uckfield, Isfield and Little Horsted)

There are no significant environmental constraints on treatment capacity. There is currently space available to extend the works if necessary and there is headroom in the Environment Agency consent for additional growth, subject to confirmation by the Environment Agency.

Any development planned close to the WTW that is sensitive to odour should be separated from it, in accordance with PPS23.³ Odour modelling has been undertaken which defines the boundary within which development sensitive to odour should be excluded. Any capital works required to mitigate odour to enable development within the odour boundary would need to be funded by developers.

Crowborough WTW (serves Crowborough and Rotherfield)

Two treatment works serve Crowborough:

- 1) St. Johns WTW covering the west of the town
- 2) Redgate Mill WTW covering the east of the town

There is limited existing treatment capacity at Redgate Mill. It is likely that additional investment will be provided in the medium term at this WTW.

Vines Cross WTW (serves Heathfield, Horam and Warbleton)

Vines Cross WTW has spare capacity available.

Villages within the District

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 Environment Agency. This may lead to a requirement for investment to provide additional treatment processes.

Edge of Eastbourne Urban Area

Development on the northern edge of Eastbourne will in principle, be required to drain to Hailsham South and/or the new discharge point, when available. However, minor infill developments will be able to drain to the works in Eastbourne, if separate sewerage would not be practical. There is finite capacity at Eastbourne.

Edge of Tunbridge Wells

The current consent requirements for works serving Tunbridge Wells are very stringent. Southern Water believes that substantial development in this area

³ PPS 23 'Planning and Pollution Control' DCLG, November 2004

may trigger a limit on the number of additional dwellings that can be connected whilst meeting environmental objectives.

Table of wastewater capacity - Wealden's Catchments

The table below entitled 'Wastewater capacity - Wealden's Catchments' lists the existing wastewater treatment works (WTWs) within Wealden District. The table provides estimated treatment headroom capacity for some of the existing WTWs and consented discharge capacity for all the existing WTWs. Southern Water is in the process of examining the existing WTW, to establish the existing treatment headroom for each catchment. The table has been partially completed in relation to known development commitments, existing treatment headroom and existing discharge consent headroom.

Investment programmes to address existing capacity issues

The installed treatment capacity of Hailsham North is below the consented flow capacity set by the Environment Agency (1,400 and 2,900 households respectively). Southern Water has applied for funding to provide additional treatment capacity to match the consented DWF headroom available. It is estimated, subject to approval by Ofwat, that the physical infrastructure can be delivered by March 2012.

The treatment capacity of Hailsham South matches the consented capacity set by the Environment Agency. Odour modelling has been undertaken, which defines the boundary within which development sensitive to odour should be excluded in accordance with PPS23.

Crowborough

Southern Water is seeking funding for a quality scheme at Redgate Mill in the investment period 2010 to 2015. As it is a scheme within the EA's National Environment Programme, it is likely to be approved by Ofwat. This will increase the treatment capacity in the catchment by 20%, providing capacity for around 2,000 additional households. The scheme is scheduled for completion in September 2014.

Investment programmes to address anticipated longer term (to 2026) capacity issues at Hailsham North and Hailsham South WTWs

Southern Water has included a bid in its PR09 Business Plan (in the investment period to 2015) for funding to investigate a new discharge location to serve new development in the Hailsham/Polegate area.

If approved by Ofwat, the investigation is scheduled for completion in March 2013. The feasibility study will define the most appropriate site for treatment, discharge, location and method of disposal. This would allow a proposal to advance towards planning application stage. The study would comprise an engineering appraisal requiring substantial funding and would include an environmental impact assessment. Funding to construct the new discharge point and associated infrastructure could be bid for in the periodic review in 2014, with delivery in the period 2015 to 2020. Ofwat generally agrees to fund investment required to meet the demand from new development with planning certainty, as identified in adopted Local Development Frameworks.

Other relevant issues

Wastewater conveyance - Investment to the sewerage system within each catchment in Wealden is likely to be required to convey flows arising from new development to the appropriate wastewater treatment works. The investment is acquired through requisitioning procedures under the Water Industry Act 1991, combined with planning conditions.

Southern Water will be looking to the Core Strategy to highlight the future longer term capacity constraint at the two Hailsham WTW, along with the East Sussex County Council (ESCC) Waste Development Framework. It is important to involve ESCC as the Waste Planning Authority in site finding exercises as soon as practical. Ofwat require the support of investment through an adopted Core Strategy and implementation is dependant on progression of the LDF and the identification of development sites allocated in South Wealden.

Southern Water published in May 2009 a Draft Resources Management Plan - Revised Draft following Consultation. This version of the plan, although not required at this stage by legislation, shows how the Company have taken into account the various issues that were stated in the Statement of Response, and includes any further development as a result of the requirements of the Environment Agency and Ofwat.

Wastewater capacity - Wealden's Catchments

	Net additional hh from base date Jan 2007 to 2011(existing permissions) [Note 1]	Existing works capacity headroom (hh)	Consented discharge capacity (estimated existing DWF consent headroom) (hh) [Note 2]
Alfriston	3	0	0 [Note 6] 100
Berwick (serves Berwick Station but not Berwick village)	2	60	200
Blackboys	9	40	166
Blackham	0	10	80
Bodle Street Green	0	0	n/a [Note 4]
Buxted	56	50	360
Catsfield (wholly in Rother District)	1		240
Cowden (wholly in Sevenoaks District)	1		98
Crouch Farm Mayfield	7	40	40
Danehill	24	0	0 [Note 6] 110
East Dean	1	5	180
East Hoathly	63	264	264
Eastbourne (mainly	21	0	0 [Note 5]

Eastbourne Borough)			
Fletching	0	0	n/a [Note 4]
Forest Row	46	560	1240
Frant	0		100
Hailsham North	1372	1400	2900
Hailsham South	1347	2400	2400
Halland	0	0	0 AMP5 scheme
Hartfield	2	36	156
High Hurstwood	0		n/a [Note 4]
Hooe	8	40	281
Lime Park Herstmonceux	1	2	n/a [Note 4]
Lunsford Cross	0	0	0 AMP 5 Scheme
Luxfords Lane East Grinstead (mainly Mid Sussex District)	1		0 [Note 5]
Maresfield	99	240	240
Meres Farm Mayfield	47		658
Neaves Lane Ringmer (mainly in Lewes District)	7	50	148
Nutley	4		54
Redgate Mill Crowborough	597	[Note 3]	2480
Ripe	0		0
St Johns Crowborough	23	0	0 [Note 6] 480
Tunbridge Wells South (mainly in Tunbridge Wells District)	18	20	20
Uckfield	670	2230	2570
Vines Cross	126	1500	2310
Wartling	0		n/a [Note 4]
Washwell Lane Wadhurst	18		93
Whitegates Lane Wadhurst	20	1050	1050
Wilmington	0		n/a [Note 4]
Windmill Hill Herstmonceux	19	300	300

Headroom is calculated in terms of households but any additional flows, including from commercial development, will erode the headroom.

hh = households.

DWF = Dry Weather Flow

n/a = not applicable

Note 1: Development data prepared with assistance from Wealden District Council, November 2008.

Note 2: Headroom based on assumed flow returned to sewer per new household of 500 litres/property/day.

Note 3: Monitoring required. Maximum capacity available is currently estimated to be 600 households (May 09). Proposed AMP5 scheme (completion scheduled for September 2014 if approved).

Note 4: Descriptive consent, very small works.

Note 5: Headroom allocated to other districts.

Note 6: New consent agreed in principle by the EA. Formal consent awaited.

(iv) Regulator of wastewater - Environment Agency (10th March 2009)

Existing capacity constraints regarding Water Quality, to meeting the growth assigned within the Regional Spatial Strategy

Fundamental concerns with regard to the impact of any new development within the catchments of the Hailsham North and Hailsham South Wastewater Treatment Works (WTW). Ecological investigations on the impact of the Works undertaken by Environment Agency have identified that ecological quality has continued to decline downstream of them both, despite the implementation of nutrient stripping techniques to improve the quality of the effluent discharge. Further monitoring is on-going and further specific sampling programmes are planned for 2009/10. Under the Water Framework Directive, the deterioration of environmental standards of a receiving water body would be unacceptable and the distribution of new development must be informed by this constraint. The need to prevent any deterioration of water quality and maximise opportunities for making improvements, must influence the location and scale of development planned within this catchment.

Ecological monitoring on the Willingdon Sewer was undertaken in 2007 which suggested that the water suffers from organic enrichment. There are a number of potential causes to this water quality issue. However further investigation would need to be undertaken at a site specific level to determine the impact of any new development within this catchment. It would need to be identified whether any specific waste water improvements would need to be made, in order ensure that any new development would not result in a deterioration of water quality within the Willingdon Sewer catchment.

Investment strategies to overcome identified capacity constraints, not to be undertaken (but regulated) by Environment Agency

In principle, there are a number of ways in which the environmental capacity constraint at Hailsham North and South WTWs can be overcome:

1. By locating development (which would exceed the current permitted effluent discharge from the Hailsham North and South WTW), outside of the catchment;
2. Applying sufficiently high levels of effluent treatment by introducing Best Available Technology which recognises the economic and technical considerations of the treatment process; or
3. Identify alternative effluent discharge locations which would not result in a deterioration of water quality elsewhere, taking account of any cumulative effect from development planned elsewhere in the District.

The Water Framework Directive (WFD) requires the UK to plan to achieve defined minimum 'Good' ecological water body characteristics by 2014 and also to plan to avoid deterioration where a waterbody's quality might drop between classes defined by the directive. Within the class deterioration of waterbodies failing to achieve 'Good' status, does not meet the requirements of the directive. Non-compliance with the requirements of the directive carries the risk of infraction proceedings against the UK. Adoption of Best Available Technology (BAT) treatment levels may allow 'Good' quality to be achieved but protecting that status will limit the amount of growth that may then be allocated within the catchment. A further implication is that if effluent is already treated at BAT standards and 'Good' status has not yet been achieved, then an increase in effluent discharge may not be acceptable at that location (as this would constitute deterioration). The use of discharge locations remote from the area where growth is required and which would not result in a deterioration of water quality, may provide a solution under these circumstances.

An Ecological Appraisal study of urban rivers was undertaken in 2005 on sewage pumping stations running through Hailsham. This report indicates that the tributaries joining the eastern Pevensey Levels are suffering from variable degrees of deterioration in water quality. It shows organic enrichment is a particular problem from the Amberstone Combined Sewer Overflow, Town Farm Estate Pumping Station and Horsebridge Pumping Station. In addition, a survey of the East Stream was undertaken during 2006 which concluded that the Little Common Combined Sewer Overflow was detrimentally affecting the watercourse. The sensitivity of the water quality within the catchments of the above pumping stations and combined sewer overflows in the south of the district, has the potential to be detrimentally affected by new development in this area. Further investigation would be required to identify the impact of any new development in this catchment and improvements needed to the wastewater infrastructure, to deal with the resultant increased flows without a deterioration in water quality.

(v) Transmission of electricity and gas - National Grid UK (2nd March 2009)

Existing capacity constraints to meeting the proposed growth assigned within the Regional Spatial Strategy

Development proposals within the Wealden District will not have a significant effect upon National Grid's infrastructure, both gas and electricity transmission. It is unlikely that any extra growth will create capacity issues for National Grid given the scale of these gas and electricity transmission networks. The existing network should be able to cope with additional demands.

Investment programmes to address these capacity issues

Electricity - Significant demand increases across the Wealden distribution electricity network area can be adequately addressed by the local network

distribution operator, through the provision of reinforcements at existing substations or at new grid supply points.

Gas - No investment programme as no gas transmission assets are located within the administrative area of Wealden District.

Other relevant issues

Electricity and gas transmission

National Grid operates the national electricity transmission network across Great Britain and owns and maintains the network in England and Wales, providing electricity supplies from generating stations to local distribution companies. Separate regional companies own and operate the electricity distribution networks that comprise overhead lines and cables at 132,000 volts and below. National Grid owns and operates the high pressure gas transmission system in England, Scotland and Wales.

National Grid and Local Development Plan Documents

The Energy White Paper⁴ makes clear that UK energy systems will undergo a significant change over the next 20 years. To meet the goals of the White Paper it will be necessary to revise and update much of the UK's energy infrastructure during this period. There will be a requirement for;

- An expansion of national infrastructure (e.g. overhead power lines, underground cables, extending substations, new gas pipelines and associated installations).
- New forms of infrastructure (e.g. smaller scale distributed generation, gas storage sites).

(vi) Local gas network distribution operator - Southern Gas Networks (7th April 2009)

Existing capacity constraints to meeting the proposed growth assigned within the Regional Spatial Strategy

All the settlements located within Wealden currently have a gas supply.

Investment programmes to address existing capacity issues

Reinforcement of the network is carried out on a reactive basis. Specific sites are assessed individually to determine the required reinforcement together with assessing who should bear the cost. As such, Southern Gas Networks will be able to adequately provide reinforcements arising from the planned increase in housing in the District.

⁴ Energy White Paper - *Meeting the Challenge*' Department of Energy and Climate Change (DECC) May 2007

(vii) Local electricity distribution network operator - EDF Energy Networks (18th February 2009)

Existing capacity constraints to meeting the proposed growth assigned within the Regional Spatial Strategy

The network capacity for the Wealden District is currently adequate for meeting existing customer demand. Forecasting load growth across the majority of the network has been adjusted to reflect the current downturn in the economy with long term forecasts indicating very low growth levels over the next few years.

Investment programmes to address existing capacity issues

An asset replacement programme to 2020 is scheduled to be undertaken, which is anticipated to meet future customer needs, particularly for connections to green and renewable energy sources. Investment of Infrastructure ahead of need is prevented by the regulator (OFGEM). The regulator views such investment as risky, inefficient and not in the best interests of customers as a whole.

WDC Commentary - Utility services implications for the Local Development Framework

It will be necessary, in conjunction with the Environment Agency and South East Water to agree an evidence base as to the necessary water efficiency measures in relation to new developments. This will need to be combined with our viability evidence base so that, if possible, a water efficiency standard can be provided through the Local Development Framework.

The Council is currently part on an on-going dialogue with Southern Water, Easy Sussex County Council and the Environment Agency regarding the provision of new infrastructure to overcome the capacity issues of waste water treatment provision in the Hailsham/ Polegate area. Matters are progressing, with an agreed recent adjustment to the Hailsham/ Polegate treatment capacity, and the partners will continue to be involved in options development. The short term and mid term capacity of the treatment works will inform options development and ultimately the housing and employment growth. Options for development in areas outside the Hailsham/ Polegate catchments will be considered against the capacities provided by Southern Water.

(F) Flood Defences

(i) Environment Agency (Flooding/Flood Defence) (10th March 2009)

Existing capacity constraints regarding Flood Risk, to meeting the growth assigned within the Regional Spatial Strategy

Part of Wealden are at risk of flooding. Environment Agency are aware that a Level 1 and 2 Strategic Flood Risk Assessment (SFRA) has been prepared in partnership with Eastbourne Borough Council for the southern part of the

District and a Level 2 SFRA is in preparation for the northern part of the District.

There are current flood risk issues in (but not exclusively to); Uckfield, Pevensey, Isfield and Forest Row. Environment Agency strongly recommend that flood risk is used to identify the acceptability of development locations across the District.

A Sequential Test must be undertaken firstly identifying sites in areas at lowest risk of flooding (Flood Zone 1) then considering reasonably developable sites tested sequentially in terms of the risk of flooding. The two SFRAs for the District will provide the evidence on which to base the Sequential Test.

Without the benefit of a Level 2 SFRA for the northern part of the District, the best available information will be from our own flood mapping and from site specific Flood Risk Assessments where they are available. The Environment Agency have commissioned a built-model of Uckfield to inform the development of a fluvial flood defence to the north of the town. The results of the modelling already undertaken for Uckfield will provide more detailed flood risk information to inform the SFRA and the Sequential Test in the interim.

Investment strategies to overcome identified capacity constraints

Flood defence improvements in Uckfield (in the form of a flood barrier on the northern bank of the River Uck) are due to begin in early May 2009. The work is intended to protect the centre of the town which is currently in the flood plain, so any proposed built development within the development boundary of the town should, in the first instance, be directed to areas of lower risk.

WDC Commentary - Flood defences implications for the Local Development Framework

The District Council will continue to develop its evidence base with regards to flood risk through the Strategic Flood Risk Assessment and associated sequential test; involving the Environment Agency throughout plan preparation.

(G) Green Infrastructure

(i) Regulator -biodiversity and green infrastructure - Environment Agency (10th March 2009)

Existing capacity constraints regarding Biodiversity to meeting the growth assigned within the Regional Spatial Strategy

There are a number of protected habitats in Wealden, not least the Pevensey Levels Ramsar site and a number of Sites of Nature Conservation Importance, SSSIs, Special Area for Conservation and Special Protection Areas. At the site allocation stage, ecological surveys will need to be

undertaken to assess the appropriateness or the scale and design of any development to ensure that sites and species are protected and where possible enhanced in addition to the national ecological protection and enhancement policy in the form of PPS9.⁵

Investment strategies to overcome identified capacity constraints, not to be undertaken (but regulated) by Environment Agency

Environment Agency 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.

Environment Agency encourage the recognition of the protection and where possible enhancement of locally important habitats and opportunities to promote green infrastructure to allow safe passage for wildlife, particularly in urban areas.

WDC Commentary - Green Infrastructure implications for the Local Development Framework

Natural England and the Environment Agency will be kept informed of the progression of the green network strategy as the options are developed and refined. Issues of sustainable drainage techniques for the regulation and remediation of surface water run-off will be considered on a broad location and site by site basis.

3.0 Conclusion

3.1 Planning Policy Statement (PPS) 12 stresses the importance placed on the Core Strategy "*making it clear how infrastructure which is needed to support the strategy will be provided...*"(para. 4.45). As the Council develops and refines its preferred spatial development option, following the current consultation, it will need to able "*to state clearly who is intended to implement different elements of the strategy and when they will happen*" (PPS12 para. 4.45). Recent advice from the Planning Inspectorate also emphasises the importance of identifying who is going to deliver the necessary infrastructure and confirming its timing complements the timescale of the strategy. Where actions required are outside the direct control of the Local Planning Authority, the Planning Inspectorate will seek evidence that there is the necessary commitment from the relevant agency to the implementation of the policies. Developing a multi-agency plan for Wealden will be a critical part of the next stage of the Core Strategy process.

⁵ PPS 9 - Planning Policy Statement 9 - Biodiversity and Geological Conservation, August 2005

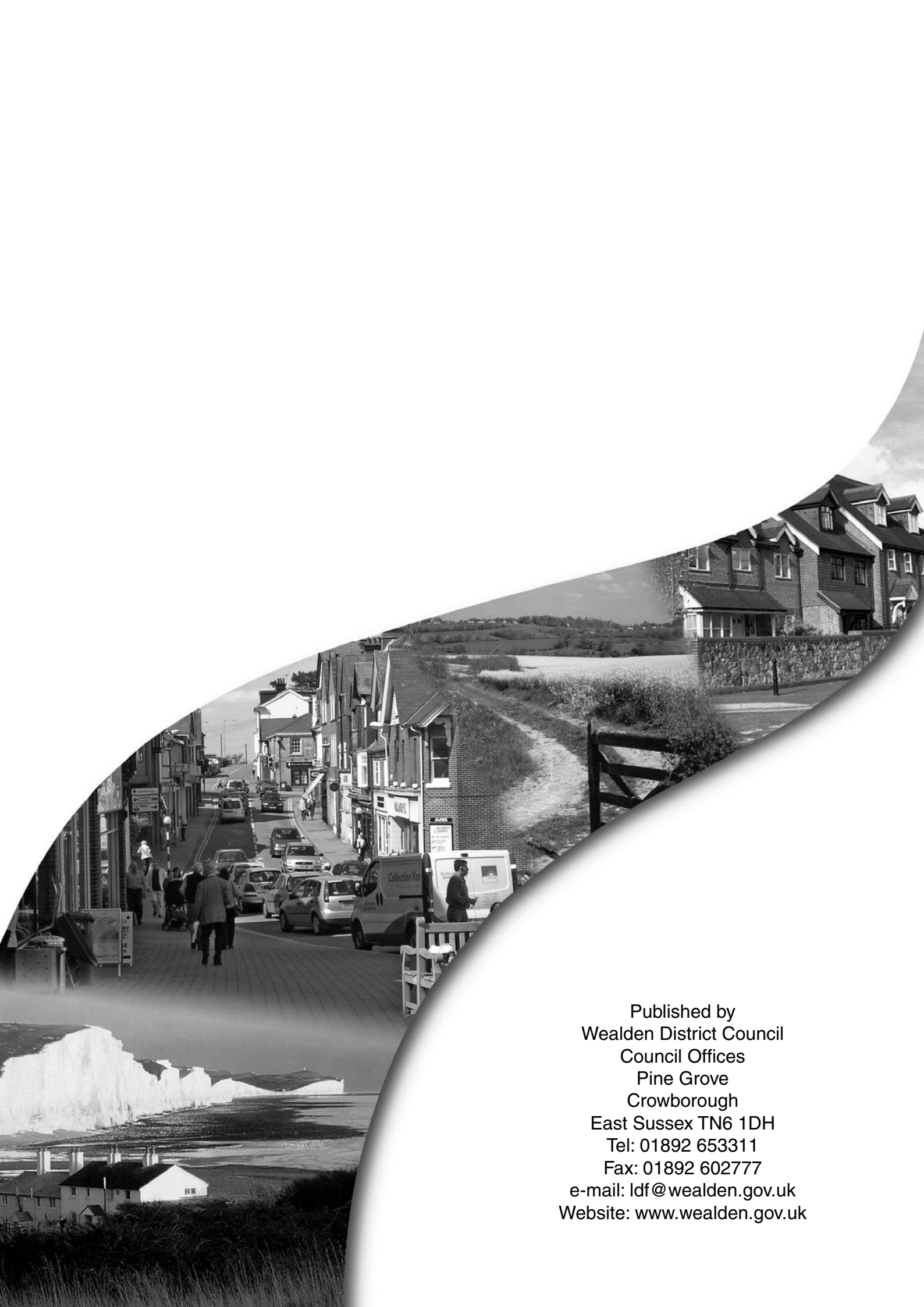
Appendix 1

Infrastructure types and categories

INFRASTRUCTURE CATEGORY	SPECIFIC FACILITY
Transport	Airports Ports Road network Cycling and walking infrastructure Rail network Bus services
Housing	Affordable housing Gypsy and Traveller Provision
Education	Further and higher education Secondary and primary education Nursery schools
Health	Acute care and general hospitals Health centres/primary care trusts Ambulance services
Social Infrastructure	Supported accommodation Social and community facilities Sports centres Open spaces Parks and play space
Green Infrastructure	Parks and gardens Natural and semi-natural urban greenspace Green corridors Outdoor sports facilities Amenity greenspace Provision for children and teenagers Allotments Churchyards Accessible countryside in urban areas River corridors Green roofs and walls Nature Conservation and Biodiversity
Public Services	Waste Management and disposal Libraries Cemeteries Emergency services (police, fire, ambulance) Places of worship Prisons Drug treatment centres
Utility Services	Gas supply Electricity supply Heat supply Water supply Waste water treatment Telecommunications infrastructure
Flood Defences	

Appendix 2
Infrastructure Agencies

Infrastructure	Infrastructure Agency
Transport	
Strategic Highway Network (Trunk Road - A27 T)	Highway Agency
Non-strategic Highway Network	East Sussex County Council
Rail Network	Network Rail
Rail Service	Southern
Community Bus Operators	Passenger Transport Division - East Sussex County Council
Education	
Education - Primary Schools	East Sussex County Council
Education - Secondary Schools	East Sussex County Council
Health	
Health Care - Strategic Health Care	South East Coast Strategic Health Authority
Health Care - Local Health Care	East Sussex Hospitals NHS PCT
Health Care - NHS Hospital Trust Princess Royal Haywards Heath Eastbourne District and Conquest (Hastings) Hospitals Pembury Hospital (Tunbridge Wells)	Brighton & Sussex University Hospitals East Sussex Hospitals NHS Trust Hospital Maidstone and Tunbridge Wells NHS Trust
Public Services	
Waste Planning	- East Sussex County Council - Development, Minerals and Waste
Emergency Services Ambulance Police Fire and Rescue	South East Coast Ambulance Service NHS Sussex Police East Sussex Fire and Rescue Service
Utility Services	
Transmission (electricity and gas)	National Grid UK
Gas supply (local distributor)	Southern Gas networks
Electricity supply (local distributor)	EDF Energy Networks
Water supply	South East Water
Water Regulation	Environment Agency
Wastewater treatment	Southern Water
Flood Defences	
Flood protection/Flood defences	Environment Agency



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