Wealden Local Plan

Duty to Cooperate
Background Paper - Appendix ESCC

Submission Document
Wealden District Council
January 2019
How to Contact Us

Planning Policy
Wealden District Council
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WLP Sites for ESCC highways input up to 19oct16.xlsx

Sent: 19 October 2016 16:46

ESCC

To: [REDACTED] WDC

1 Attachments

WLP Sites for ESCC highways input up to 19oct16.xlsx (36 KB);

Message

Dear All,

East Hoathly are done with exception of one for which a plan was not provided.

Regards

[REDACTED]

Principal Transport Development Control Officer
East Sussex County Council
County Hall
Lewes BN7 1UE

[REDACTED]@eastsussex.gov.uk

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You can visit our website at http://www.eastsussex.gov.uk
RE: WLP Sites for ESCC highways input up to 19oct16.xlsx

Sent: 19 October 2016 17:03

From: [redacted]

Message

Ok thank you.

Send as you go, then I can fit in the dribbles of SHELAA so it doesn’t get too monotonous!
Thanks

Principal Transport Development Control Officer
East Sussex County Council
County Hall
Lewes BN7 1UE

Subject: RE: WLP Sites for ESCC highways input up to 19oct16.xlsx

Thank you. Really appreciate your input, [redacted] has said don’t worry about Hailsham as this will be strategic!

There a couple of sites that I am looking to allocate that have just been submitted. Can I ping you these please? Also, I have a couple of questions, which I am writing down as I go. Can I send you these on Monday as a group or would it be possible to send them as I go? I am bearing in mind that you are busy too.

Kind regards

ESCC2
RE: Coxlow farm, Horam 875/3030

Sent: 21 October 2016 11:48

Yes, it is indeed a lot larger! It's a late submission, that I have to consider! Thank you, that is really helpful.

From: [redacted]@eastsussex.gov.uk
Sent: 21 October 2016 11:46
To: [redacted]
Cc: [redacted]
Subject: RE: Coxlow farm, Horam 875/3030

Hi

This site is substantially larger than the 123 site for 8-9 units. A main access from the A267 for 123, 875 and recreation land would in principle be advisable rather than coming off Grange Close as was suggested for site 123. I cannot be specific about the type of access this should be because any junction assessment would need to take into account the highway works that will be in place as a result of the Merrydown site, or any capacity constraints that may emerge at the Horsebeech Lane junction should the Rose Mead Farm development come forward. With such an elongated site, there would be benefit to having the bus routed through the site to encourage sustainable travel modes.

Hope this helps to some degree, with so much potential change to the network imminent there is no specific solution at this stage.

Principal Transport Development Control Officer
East Sussex County Council
County Hall
Lewes BN7 1UE

From: [redacted]@eastsussex.gov.uk
Sent: 20 October 2016 20:45
To: [redacted]
Subject: Coxlow farm, Horam 875/3030

Hi

The above site has recently been submitted. I was wondering whether it would be an option to provide a highways solution like a roundabout to assist with access to the above site to allow access to be gained from the southern part of the site that is adjacent to the road rather than the northern land parcel 123/3030? Any thoughts on either option? We would be looking to allocate around 300 houses and required infrastructure maybe including community facilities of some sort.

Thank you

ESCC3
Thanks I couldn’t find these at all when I needed them on Friday.

Hi,

Comments on Heathfield sites below.

...[Email Signature]...  
Senior Planning Policy Officer  |  Environment and Community Services  
Wealden District Council  |  Council Offices  |  Vicarage Lane  |  Hailsham  |  East Sussex  |  BN27 2AX  
...[Email Address]...  |  Web.  
www.wealden.gov.uk/planningpolicy

From: [Email Address]  
Sent: 14 October 2016 09:45  
To: [Email Address]  
Cc: [Email Address]  
Subject: FW: WLP Sites for ESCC highways input up to 03oct16.xlsx

564/562/588/567 – site on A267 (8580AADT, 2% HGV) no footways, 40 mph speed limit (visibility 120m x 2.4m req’d). Not clear on housing numbers. Sightlines are likely to be achievable but consideration should be given to reduce speed limit to 30 mph to accommodate increase in ped/cycle use. May need to be supported with physical features. Town centre 1km approx; primary school on Sheepsetting lane and reached on footways. Cuckoo trail 1.4km accessed via Leeves Way (shortest route). Queuing at junction with A267 and Cross-in-Hand will need to be assessed. Public transport avail on A265 regular services to TW and HH.

566/560/561/565 – as above. New Pond Hill is not wide enough for 2 vehicles to pass (desktop measurement offers 4.1m- 4.3m and has no footways – unsuitable for access unless only for a small number of dwellings (speeds derestricted – visibility sightlines need to accord with actual speeds).
-----Original Message-----
From: [REDACTED]@eastsussex.gov.uk
Sent: 14 December 2016 10:27
To: [REDACTED]@wealden.gov.uk
Subject: RE: Re Wealden Local Plan - HIGHLY CONFIDENTIAL - ALLOCATION MAPS

Many thanks

[REDACTED]
Principal Strategic Planner
East Sussex County Council

From: [REDACTED]@wealden.gov.uk
Sent: 14 December 2016 10:10
To: [REDACTED]@wealden.gov.uk
Subject: Re Wealden Local Plan - HIGHLY CONFIDENTIAL - ALLOCATION MAPS

NB The information contained within or attached to this e-mail, is currently exempt from disclosure under Regulation 12 (d) of the Environmental Information Regulations 2004 in that the Wealden Local Plan is still in the course of completion.

Hi [REDACTED],

Please find attached 10 plans showing the proposed locations for housing allocations in the following areas:

Berwick
Hailsham
Heathfield
Herstmonceux
Horam
Lower Willingdon
Ninfield
Stone Cross
Wadhurst
Westham

Please note that these plans are still subject to modification as we refine and complete the plan and are not for general circulation. However, we hope that they assist with assessing County infrastructure requirements.

Kind regards

[REDACTED]

ESCC5
-----Original Message-----
From: [redacted]@eastsussex.gov.uk
Sent: 31 January 2017 16:45
To: [redacted]@wealden.gov.uk
CC: [redacted]@wealden.gov.uk, [redacted]@wealden.gov.uk, [redacted]@eastsussex.gov.uk
Subject: RE: ESCC comments on WLP 16.1.17 draft

HI

Further to my email yesterday please find attached ESCC officer comments on the draft Plan. For ease of reference I have also included the landscape and education comments I had previously sent.

Unfortunately Waste management comments have been delayed but I am hoping to send these to you in the next couple of days.

Transport DC and Flood risk management officers will provide comments through the meetings that have been suggested. We will be in touch shortly about preferred dates.

Kind regards,

[Redacted]

Principal Strategic Planner
East Sussex County Council

From: [redacted]@wealden.gov.uk
Sent: 31 January 2017 11:46
To: [redacted]
Cc: [redacted]
Subject: RE: ESCC comments on WLP 16.1.17 draft

Dear [redacted]

Thank you for getting back to us within a short timescale and for the comments provided so far.

It would be really helpful to meet Transport and Floodrisk Management Officers and thank you for this offer. If we can meet transport officers on one date and flood risk management officers on another then that would probably work best for all.
We are currently free on the following times / dates and would prefer earlier dates if this is possible?

6th Feb – 10am until 1pm
7th Feb – 9am – 12pm (Option for transport only)
13th Feb – [9am – 1pm
17th Feb – All day
23rd Feb – All day
24th Feb – All day

We are happy to meet either at your offices or ours. Whatever works best.

Look forward to hearing from you shortly.

Kind regards

<table>
<thead>
<tr>
<th>Local Plan Team Leader</th>
<th>Environment and Community Services</th>
</tr>
</thead>
<tbody>
<tr>
<td>Wealden District Council</td>
<td>Council Offices</td>
</tr>
<tr>
<td>[email protected]</td>
<td>[email protected]</td>
</tr>
</tbody>
</table>

From: [email protected]
Sent: 30 January 2017 16:20
To: [email protected]
Cc: [email protected]
Subject: ESCC comments on WLP 16.1.17 draft

Hi,

Thank you for the opportunity to provide further comments on the emerging Wealden Local Plan. Please find below comments from education and attached from landscape. I am expecting to get more comments back to you tomorrow which I hope will be OK.

Some officers are however struggling to provide comprehensive comments/suggested changes on the plan within your deadlines due to the length and complexity of the plan and other workload pressures. Therefore officers wish you to note that comments will not comprehensively represent all interests of ESCC and that further comments may need to be made or changed particularly on parts of the plan we may not have considered yet and where the supporting evidence has yet to be finalised and/or made available to us.

To help with the review of policies it is suggested that it would be useful if WDC officers could meet and go through the site specific policies with Transport DC and Flood risk management officers. Please could you let me know if this would be OK and possible dates.

Kind regards,

Education Comments

- Remove any specific reference about early years, primary and secondary from any policy wording and replace with ‘education provision’
- Remove any reference to ‘school’ provision in any text and replace with ‘education’ provision
• Avoid naming specific schools and talk more generally about ‘education provision’ (e.g. page 241, para 19.37 ‘Heathfield Community College’)
• Remove reference to land and buildings for education from Policy INF 2 on page 58 regarding the loss of infrastructure. The responsibility for this sits with the LA in compliance with statutory legislation, I do not believe it is in WDC’s gift or remit to include a policy to this effect.

I would like to see the revised version before it is published to ensure that our comments have been taken on board.

Principal Strategic Planner
East Sussex County Council

From: [email] Sent: 16 January 2017 15:08
To: [email]
Cc: [email]
Subject: RE: Local Plan update

Dear [name],

Please find attached a Confidential working Draft of the Wealden Local Plan. Please note that there is text missing from certain areas. There are also some maps missing.

The document will be refined further over the coming weeks and the wording of certain text and policies is likely to be updated as the document is reviewed and refined. However, hopefully this early draft will allow us to progress in partnership with yourselves.

If you have any questions then please do not hesitate to contact me in [name]’s absence.

Kind regards

[Name] | Local Plan Team Leader | Environment and Community Services
Wealden District Council | Council Offices | Vicarage Lane | Hailsham | East Sussex | BN27 2AX

From: [email] Sent: 13 January 2017 14:42
To: [email]
Subject: RE: Local Plan update

Thanks.

Have a good weekend too.

[Name]
I am unable to confirm Committee dates as these have not been set yet, however, I do intend to send you a PDF of the Draft Plan in confidence sometime on Monday. There will be some gaps still, but it is now further than it was previously.

is on leave until Wednesday, so I am unaware of the education requirements at the moment. This is left blank in the draft plan currently, but we will add requirements when is back.

Hope that helps?

Have a good weekend.

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Hi

I have just got out of office. So clearly I was a bit late in sending my email. Are you able to respond in her absence?

Many thanks,

Principal Strategic Planner
East Sussex County Council
From: [redacted]
Sent: 13 January 2017 14:15
To: [redacted]@wealden.gov.uk
Subject: Local Plan update

Hi [redacted],

I am suddenly conscious that you are about to go away fairly soon, and just wanted to get a quick update before you go. Is there any update on the timetable of the Local Plan, when it's going to committee, Full Council and out for consultation? Also when would it be possible for us to see confidentially the latest draft of the Plan. Hopefully [redacted] will have passed on the information from [redacted] on education requirements to you.

Many thanks,

[redacted]

Principal Strategic Planner
Strategic Economic Infrastructure Team
Communities, Economy and Transport Department
East Sussex County Council

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Wealden Local Plan draft version 16.1.17

ESCC Officer Comments - 31.1.17

Transport Policy and General Infrastructure

Suggested new text is written in **red**, text suggested to be deleted has a ***strikethrough***

Vision for South Wealden Growth Area

- Page 95 - Change text 'The sustainability of the area will have been further improved by facilitating a new **parkway** rail station'

Infrastructure

- Page 97, Para 12.12 - We still strongly disagree with and object to the inclusion of the sentence 'The historic under provision of infrastructure'. This should be removed. The need for the significant levels of infrastructure comes from high levels of additional growth and not an under provision. Infrastructure funding is required to support growth not to fund existing deficiencies. Therefore we wish to see the sentence replaced with -

>'The high levels of development proposed within this plan will require significant investment into new infrastructure to support that growth.'

Strategic Transport Infrastructure

- Page 98, Para 12.14 - add text '.....Transport Study with updates to transport data and an extension to the geographical...'
- Para 12.18 - change text '.....Stage 2 Transport Study will be undertaken during 2017 – 2019....'

Policy SWGA 4 - A27 Improvement

- Page 100 - Remove last sentence, this does not add anything to the policy and not sure exactly what it means. The suitability of development will be demonstrated through a suitable study agreed by East Sussex County Council and Highways England.

Policy SWGA 37 Development in West Hailsham Sectors

- Page 158, Last para in Policy – Add text ‘Feasibility studies are required to be funded by developers within this sector with regards to the A22 link road. These studies must identify the proposed route of the A22 link road, which has been agreed by the Highway Authority. Development must not be released until it is confirmed by the Highway Authority that development will not prejudice the delivery of the A22 link road.’
- Also change same text in 13.70.

Hailsham West 1 Policy SWGA 39 Infrastructure

- Remove the following from list under b)
  - Boship roundabout
  - A267 North Street junction
- New distributor road between Hailsham Bypass and Golden Dicker Road plus links to Hailsham bypass junctions

Village and Towns with Allocations

Heathfield

- page 241, para 19.38 - Replace text ‘No infrastructure requirements have currently been identified in relation to the primary road network (A265) which forms the main route and High Street of the town.’ with ‘Cumulative impacts of development on the transport network and any necessary mitigation measures will be identified and considered through future transport studies.’
Wadhurst
- Add text - 'Cumulative impacts of development on the transport network and any necessary mitigation measures will be identified and considered through future transport studies.'

East Hoathly
- Page 278 para 21.19 add text 'Cumulative impacts of development on the transport network and any necessary mitigation measures will be identified and considered through future transport studies.'

Horam
- Page 295 para 22.23 Replace text 'No infrastructure requirements have currently been identified in relation to the primary road network (A267 and connecting roads) which forms the main route and High Street of the village. However again, this will be subject to further review.' with 'Cumulative impacts of development on the transport network and any necessary mitigation measures will be identified and considered through future transport studies.'

Ninfield
- Page 312 para 23.24 Replace first sentence 'No infrastructure requirements have currently been identified in relation to the primary road network (A269) which forms the main route and High Street of the village, but this may be subject to review.' with 'Cumulative impacts of development on the transport network and any necessary mitigation measures will be identified and considered through future transport studies.'

Herstmonceux
- Page 326 para 24.37 Add text to the end of the para 'Cumulative impacts of development on the transport network and any necessary mitigation measures will be identified and considered through future transport studies.'

Edge of Tunbridge Wells
- Page 331 para 25.8 Add text 'Cumulative impacts of development on the transport network and any necessary mitigation measures will be identified and considered through future transport studies.'

Village and Towns with Development Boundaries

Crowborough
- Page 350 para 27.10 Replace text 'No infrastructure requirements have currently been identified in relation to the primary road network (A22) which runs through the town, or connecting routes. This may be subject to review.' with 'Cumulative impacts of development on the transport network and any necessary mitigation measures will be identified and considered through future transport studies.'

Village and Towns Infrastructure Policies

- In advance of the CIL review and particularly a revised Reg. 123 list it is felt that it is not appropriated for policies to state which development contributions mechanism (CIL/S106) infrastructure will be funded by.
- Uncertainty over interpretations of the Reg. 123 list and its implications raised previously still remain. In particular, the current 'comprehensive' nature of the Reg. 123 list is undermining the ability of the Highway Authority to secure off-site and non-strategic highway infrastructure works (often for road safety reasons) that are required to support the developments permitted. There is general concern and uncertainty over how some infrastructure will be funded through the CIL/S106/S278 regime and therefore there are issues over how infrastructure will be funded and delivered to support development in a timely manner.
- Infrastructure policies should also refer to strategic transport improvements being required as identified by transport studies.
• It is noted that infrastructure policies within this section still need to drafted or finalised therefore we wish to see these once they are more advanced.

**Archaeology - head line comments at this stage**

1) The Plan has not objectives for the Historic Environment and there are therefore no Key Indicators. As a minimum Heritage at Risk should be considered for inclusion as a measure.

2) Site Allocations— has undertaken a RAG assessment for all WDC site allocations which has been submitted to WDC. The relevant comments about archaeological interest, risk and approaches to assessment, evaluation and mitigation should be included with the texts on each site allocations in the Plan.

3) Section 43 Historic Environment:

4) 43.6 ‘...help ensure development is sustainable. Updated Conservation Area appraisals.’

5) 43.8 ‘...by notable events such as the iron industry in the Roman, medieval and post-medieval period and remnants of this area evident...’ We also suggest that the following text is added to this section: ‘Recent development-led archaeological work in Wealden District as revealed new and important evidence for settlement and landscape development during the prehistoric, Romano-British and subsequent periods.’

6) Policy HER 1 – Make reference to the significance of the asset, including drawing from research and documentation including as a minimum the East Sussex Historic Environment Record;’

7) 43.12 – We suggest adding the following text: ‘The known sites and areas of archaeological interest within the district are mapping within the Historic Environment Record as Archaeological Notification Areas (ANA). As yet undiscovered archaeological remains, in particular below ground but also hidden with historic buildings and structures, can be found outside these ANAs.’

8) 43.13 ‘The is a common misconception that archaeology related to below ground remains only, but buildings may also have archaeological interest as they...’

9) Policy HE 2 – we would like to have the opportunity to present a detailed re-writing of this policy. We would be happy to provide a draft this this would be acceptable and/or discuss with the WDC officers

10) Policy HE 3 – we would like to suggest an additional policy statement here ‘to ensure that before demolition takes place an adequate archaeological record is made of the building/structure.’

11) 43.15 – Suggest this section could be called ‘Non-Designated or Locally Designated Built Heritage Assets

12) 43.16 ‘There are examples of non-designated heritage assets.’


**Ecology**

Spatial objective 6 - Natural Environment

• Should be amended to include habitats and species outside designated sites, e.g. "We will have particular regard to all of our national and local designated ecological features and to Habitats and Species of Principal Importance (listed under Section 41 of the Natural Environment and Rural Communities Act 2006) which may occur outside designated sites, and will seek a net gain of biodiversity with regards to these features".

Key indicators - natural environment

• It is agreed that net gain in biodiversity should be used as an indication of whether WDC is meeting spatial objective 6, but consideration will need to be given to how this indicator will be measures. One possibility is regular review of LWS to ensure that and increasing number are brought into positive conservation management (in line with Single Data List 160-00).
Spatial Objective 10 - Health, Wellbeing and Communities
- The link between green infrastructure and health and wellbeing is supported. Green infrastructure should seek to be multi-functional where possible.

Hierarchy of Sites - Biodiversity (7.1 - 7.3)
- Local Nature Reserves should be added to the hierarchy of sites. These are statutory sites designated for both people and wildlife. They are places with wildlife and/or geological features that are of special interest locally. They offer people special opportunities to study or learn about nature or simply to enjoy it.
- Across Sussex, Sites of Nature Conservation Importance are now being referred to as Local Wildlife Sites (LWS) in line with Defra guidance and to aid clarity between local authority areas.
- It is important to note that LWS are often of equivalent interest to SSSIs. However, whereas SSSIs are representative of different habitats and species, LWS networks provide a comprehensive suite of sites.
- Para 7.5: the statement that an assessment of the existing nature conservation assets on a development site should be undertaken at the application stage is supported; such an assessment should be carried out in accordance with national best practice (CIEEM Technical Guidance) and BS42020:2013 Biodiversity - Code of Practice for planning and development.
- Para 7.6: rather than referring to a sequential approach, the applicant should provide evidence that the mitigation hierarchy has been followed.
- Policy EA 1 Biodiversity is broadly supported. SNCLs should be referred to as LWS. a) should be amended to "... a significant effect alone and/or in combination...". Also, Biodiversity Opportunity Areas were defined by the Sussex Biodiversity Partnership rather than the Sussex Biodiversity Action Plan. Habitats and Species of Principal Importance (Section 41 of the NERC Act) should be used to guide the LA in assessing the importance of ecological features.

Policy SSS 1 - General Development Principles
- Para r) states that where it is not possible to achieve a net gain in biodiversity on site then S106 planning obligations will be required to ensure a net gain through the provision of off-site enhancement and management. This statement needs to be clearly supported by a policy on biodiversity offsetting, setting out the metrics to be used etc.
- Para s) is a little weak with respect to the protection of wildlife corridors and stepping stones.

Site Allocations
- All planning applications must be accompanied by an Ecological Impact Assessment, carried out in accordance with CIEEM Technical Guidance and BS42020:2013 and the mitigation hierarchy should be followed. Without specific detail, it is not possible to comment on appropriate mitigation, compensation and enhancement. However, the commitment to the provision of green infrastructure and natural green space through the retention, protection and enhancement of existing features and the creation of new ones is welcomed.
- Throughout, reference should be made to Habitats and Species of Principal Importance (S41 NERC Act) rather than or as well as to BAP habitats and species.

Policy ETW 2: Allocation - Land adjacent to Tunbridge Wells
a. The interest features of Hawkenbury Meadow LWS may have changed since its designation. As such, the most ecological important areas of the LWS should be protected, retained and managed taking into account the objectives of the LWS designation and any additional interest that may have developed since designation.

i. Wording should be amended to states "... a formal mitigation strategy will need to guide the protection of reptile populations to ensure their long-term viability". Whilst translocation may
be the best policy, it may be possible to keep at least part of the population on site; the proposed amendment keeps this option open.

**Landscape Comments**

**Spatial objective 6**

In order to reflect policy paragraph 109 of the NPPF this objective could refer to the need to protect and enhance sensitive and/or valued landscapes.

Valued landscapes are as defined in the European Landscape Convention:

"Landscape" means an area, as perceived by people, whose character is the result of the action and interaction of natural and/or human factors;

A landscape indicator would be: Evidence of conservation and enhancement of local landscape character, distinctiveness and sense of place.

**Section 8**

This section describing the distinct character areas of the district is welcomed, a cross reference to the National Character Assessment and The East Sussex County Landscape Assessment would provide the link to the background evidence context.

**Policy EAL1**

c) As well as taking account of views from the designated landscapes development would need to have regard to the setting of the AONB and SDNP. Setting is not just about the view as there is usually a transitional character to areas on the boundaries which share the sensitivities and characteristics of the designated landscape and provide a buffer or gateway to them.

d) To be in accord with NPPF para.109 it is recommended that this refers to locally valued landscapes rather than locally designated. It is not clear what is meant by locally designated as AONB and National Park are national designations. Habitat and heritage designations can add to the value of local landscapes.

**Policy SSS1**

h) Recommended additional wording… a landscape and visual impact assessment will be undertaken to inform the appropriate landscape mitigation measures required to protect features of landscape……

Suggest omit last sentence ‘All landscaping must relate to the design of development’ and substitute with… A landscape design strategy should be considered in the earliest stages of scheme development and be fully integrated with the design of the development.

s) and t) Include protection of ancient hedgerows as landscape features and wildlife corridors.

**Policy SWGA7**

It is recommended that this policy is cross referenced with Policy SWGA 12 c) so that open space provision is linked with and incorporated into multifunctional GI.

Multi-functional GI needs to be incorporated into the masterplans required in policy SWGA 11 in the earliest stages of site planning.

**Policy SWGA 12**

Recommended rewording…
f) A landscape and visual assessment...... and a scheme implemented which protects landscape character, features and views.

Suggest omit last sentence ‘All landscaping must relate to the design of development’ and substitute with: A landscape design strategy should be considered in the earliest stages of scheme development and be fully integrated with the design of the development.

Policy SWGA 13

General Comment: the Landscape Institute recommends that the term landscaping is avoided when referring to landscape mitigation, SUDs and masterplans as it suggests the landscape scheme is an afterthought rather than an integral part of the site analysis and design process.

Policy SWGA 16

a) Public rights of way need to be integrated into the network of green infrastructure corridors to ensure that they are given generous accommodation and to maximise the amenity value. This could be an overarching section under the GI policy.

South Wealden Growth Areas

The growth areas around Hailsham, Polegate, Stone Cross and Berwick are obviously extensive and it is important that this is set within a robust and defended landscape framework which conserves and enhances the most valued landscape areas and features including habitats, water features, flood plains and recreational routes. It is recognised that the Green Infrastructure part of the plan is still to be developed, however it is strongly recommended that a mapped GI framework is provided to support the SWGA part of the plan. This would provide the context for the setting of individual areas of development and prevent coalescence of distinct settlement areas. If the strategic landscape master planning is left to each individual development this would miss the opportunity to create a comprehensive multifunctional GI framework or adequate mitigation.

This is set out in Policy SWGA 12 c) with regard to individual development. However if developers can work within an established GI framework, as set out above, it would be easier to ensure that they deliver strategic GI as well as site specific landscape mitigation.

Much of the mapping for this is already available in the GI mapping for East Sussex and held by the Sussex Biodiversity Record Centre. The background paper: Landscape Character and Development Option Evaluation Study2009 does identify landscape buffers and green corridors which could provide the baseline for GI mapping for each settlement where growth is planned. The more recent Wealden Landscape Settlement and Character Assessment (CBA 2014) also maps sensitive landscape and heritage features.

The key areas for this GI framework to address would be:

Hailsham North –

- Landscape corridors and buffers for the Cuckoo Trail and water bodies/ flood plains and woodland.

Hailsham East – The plan acknowledges that there is a sensitive relationship with the Pevensey levels which would require physical and visual separation from proposed development. This could be achieved with:

- Suitable open landscape buffer areas adjacent to the levels
- Tree planting on the edges of the proposed development.
- Landscape corridors for rights of way and streams.
Hailsham South –

- landscape buffers to the Cuckoo Trail and other rights of way,
- landscape corridor buffers to streams and flood plains.
- Paragraphs 13.65 and 66 identify that Area South 5 is a strongly rural landscape with strong rural character. This provides evidence for retaining the southern part of this area as open countryside. A clear landscape separation should be provided between new settlements at Hailsham and Polegate, this is particularly important to the protection of views from the South Downs National Park this is acknowledged in the draft plan in 13.55 and 13.61.

Hailsham West -

- The landscape corridor of the Cuckmere river valley between Upper and Lower Dicker at Coldharbour Road and Knockhatch (Hailsham West 2) is identified as sensitive landscape with low capacity for development in both landscape background studies. It is recommended that this area is not developed for the extent of the Character Area 9 in the Chris Blandford study. This would also protect the floodplain.

The development proposals for the remainder of Hailsham East 3 and 4 would need to be in a strong new landscape structure of trees and woodland as the open rectangular structure of the landscape would be sensitive to change in the absence of this.

Policy SWGA 36 – a new distributor road between Golden Cross and the A22 has obvious environmental implications for impacts on landscape character and views which would need to be fully assessed.

Stone Cross SC2B – (Friday Street Farm) it is recommended that development is restricted to the southern facing slopes to protect the visual sensitivity of Mountney level.

Berwick Station Policy SWGA 63. The landscape structure of the fields in Berwick station West E lacks structure with few hedgerows and trees it is also open to views from the SDNP. Any proposals would need to strengthen the landscape structure with tree and woodland planting to reinforce existing boundaries and tree belts.

East Hoathly,

The proposals would involve expansion of the village into some sensitive countryside areas. The detailed policies do allow for the retention and enhancement of key landscape features.

A green infrastructure map and strategy for these areas will ensure that the existing hedges, tree belts, stream valleys and rights of way are retained in generous green corridors. The new development boundary would need to be well defined with defensible boundaries.

Horam

The proposals would involve expansion of the village into some sensitive countryside areas. The detailed policies do allow for the retention and enhancement of key landscape features.

A green infrastructure map and strategy for these areas will ensure that the existing hedges, tree belts, stream valleys and rights of way are retained in generous green corridors. The new development boundary would need to be well defined with defensible boundaries.

Horam South around Coxlow Farm is on a ridge and potentially visible from the countryside to the east. The landscape mitigation scheme would need to address the visual impacts from the wider countryside.
Ninfield

The draft plan acknowledges that the site selected for development is exposed to long views and is sensitive due to its open nature and lack of boundary trees. The policy requirements should ensure that development on this site can be mitigated by restoring lost landscape structure within the development and providing woodland buffers to the boundaries with the countryside.

Education

- Remove any specific reference about early years, primary and secondary from any policy wording and replace with 'education provision'
- Remove any reference to 'school' provision in any text and replace with 'education' provision
- Avoid naming specific schools and talk more generally about 'education provision' (e.g. page 241, para 19.37 'Heathfield Community College')
- Remove reference to land and buildings for education from Policy INF 2 on page 58 regarding the loss of infrastructure. The responsibility for this sits with the LA in compliance with statutory legislation, I do not believe it is in WDC’s gift or remit to include a policy to this effect.

I would like to see the revised version before it is published to ensure that our comments have been taken on board.
I hope you are well?

Please find attached amendments to chapters 13 – 17, these are included as tracked changes and reflect the outcomes of the transport modelling.

We would also like to suggest amendments to chapter 7, page 59 - Please can you remove text under future studies and replace with the following:-

Policy Inf 3
Transport Infrastructure
Future Studies

Studies will be undertaken to assess the impact of the proposed growth on the wider highway network, to assist in the identification of additional transport improvements. These will include:-

- A271 Corridor Study
- A267 Corridor Study
- A26 Corridor Study
- A22 Corridor Study

I would also like to raise just a couple of points:-

1. Rail – This has been reflected in chapter 16 Polegate and Willingdon. Whilst this has not been assessed by the transport modelling work, we think that it is important that it is reflected and we propose to work with Network Rail, during the plan period, to assess the impact of the growth on Polegate Rail Station.

2. Eastbourne – Whilst the impact of the growth on the Eastbourne highway network has not been specifically highlighted, we propose that there will be an opportunity to assess this as part of the A22 Corridor Study.

3. FYI - Reference to a stage 2 study has been removed and this will be replaced by transport studies, to assess the wider impacts on the network on key corridors and to identify the detailed requirements for specific locations i.e. Polegate and Hailsham Town Centres.

Please note that we are awaiting the final transport modelling reports from ESCC, these should arrive either today or tomorrow. If following assessment of these, we find that we need to make any further changes to the WLP document, we will advise you asap.

ESCC

If you have any queries, please let me know. Please note that I am on leave until the end of th
of this week, returning on 4 September 2017.

Kind regards

Principal Transport Policy Officer, Strategic Economic Infrastructure
Economic Development, Skills and Infrastructure Service, Communities, Economy & Transport

eastsussex.gov.uk

Please note that my working pattern is usually Monday, Tuesday, Thursday and Friday 7.30am-3.00pm, but I can be flexible with this.
From: [email@example.com]@wealden.gov.uk
Sent: 09 October 2018 15:49
To: [email@example.com]
Cc: [email@example.com]
Subject: FW: Wealden Local Plan Draft settlement Chapters
Attachments: East Hoathly.pdf; Wadhurst.pdf; Heathfield.pdf; Wadhurst.pdf; Heathfield.pdf; East Hoathly.pdf

-----Original Message-----
From: [email@example.com]@wealden.gov.uk
Sent: 21 February 2017 15:12
To: [email@example.com]@eastsussex.gov.uk [mailto:[email@example.com]@eastsussex.gov.uk]
CC: [email@example.com]@eastsussex.gov.uk
Subject: Wealden Local Plan Draft settlement Chapters

Dear [Name],

Further to the discussion with [Name] this morning I have attached 3 x draft chapters and the associated maps for:

- Heathfield
- Wadhurst
- East Hoathly

These are still very much draft but hopefully an improvement from last time. There are more to come but I have been side tracked to the topic of Landscape for now!

Chapters etc. attached for comment by [Name] and other officers (if you would like to circulate) as agreed at our meeting. We have not yet labelled the sites but if you or [Name] want to give me a call I can guide you through to Label. Apologies I am at home working and not in the office –

[Name]

I have hopefully incorporated comments from our discussion but if you have any further comments or you would like to amend wording then I am more than happy for alternative wording to be suggested. If I can have this by the end of the week that would be good. We hit the publish button on 2nd March.

Any questions then please give me a call and thank you in advance.

[Name]

[Name] | Local Plan Team Leader | Environment and Community Services
Wealden District Council | Council Offices | Vicarage Lane | Hailsham | East Sussex | BN27 2AX
Further to the IDP meeting and our meeting afterwards, I wanted to let you know that we should be in a position to send you the broken down housing figures by next week. This will be accompanied by a map showing the Middle Supper Output Areas.

At your earliest convenience would you be able to send through the education and transport meeting notes as my colleague is currently compiling the meeting notes and minutes of the IDP meeting.

Kind regards

(Hons) MA MRTPI | Senior Planning Policy Officer |
Wealden District Council | Council Offices | Vicarage Lane | Hailsham | East Sussex | BN27 2AX
@wealden.gov.uk | Web. www.wealden.gov.uk

Communities
Environment
Economy

www.wealden.gov.uk
Facebook
@wealdenDC

Sign up to MyWealden to access our services online
We hope to be in a position to send them through next week.

Kind regards

[Redacted]

Senior Planning Policy Officer | Wealden District Council | Council Offices | Vicarage Lane | Hailsham | East Sussex | BN27 2AX
@wealden.gov.uk | Web. www.wealden.gov.uk

From: [Redacted]@eastsussex.gov.uk
Sent: 31 May 2018 12:15
Subject: RE: Housing Figures and Infrastructure

Is there any update on when you can get the revised breakdown of housing figures to us?

Also it would be useful to know how the revised figures compare with the development levels in the Transport Study (Table 2.4, page 7). I am slightly concerned that the figures now are a lot higher than were tested. The table shows that the model only allowed for windfalls of 350 dwellings.

I am cautious that we need to be careful about the exact conclusions that are coming out of the Transport Study.

Thanks,

[Redacted]

Principal Strategic Planner, Strategic Economic Infrastructure
Economic Development, Skills and Infrastructure Service
Communities, Economy and Transport
eastsussex.gov.uk

From: [Redacted]
Sent: 18 May 2018 11:07
To: [Redacted]
Subject: RE: Housing Figures and Infrastructure

Thanks, I have reminded [Redacted] and [Redacted] to send their notes to you directly.

Please can I remind you that in order for education colleagues to update their forecasts they will need the figures updated in the spreadsheet sent in February this year by [Redacted] (attached).

Kind regards,

[Redacted]

ESCC23
-----Original Message-----
From: [redacted]@wealden.gov.uk
Sent: 8 June 2018 08:49
To: [redacted]@eastsussex.gov.uk, [redacted]@eastsussex.gov.uk
CC: [redacted]@eastsussex.gov.uk, [redacted]@wealden.gov.uk
Subject: FW: HIF Forward Funding - East Sussex

Please find initial responses attached to the questions that I think Wealden need to cover for discussion at our meeting on Tuesday.

Hope these are helpful as a starting point – come back to me in the meantime if you have any follow up questions.

Best regards

[signature]

Director Planning Policy and Economic Development
Wealden District Council

From: [redacted]@eastsussex.gov.uk
Sent: 05 June 2018 10:11
To: [redacted]@eastsussex.gov.uk
CC: [redacted]@eastsussex.gov.uk
Subject: HIF Forward Funding - East Sussex

Hi

We have been contacted by Homes England (HE) with regards to our HIF bid for Forward Funding. The e-mail received is below. You will see in the attached that HE have flagged up a number of queries that they are seeking further information on. At our meeting next Tuesday, we would like to be in a position to collectively agree a response to the queries raised and

ESCC24
arrange the date for the meeting with HE (looking at the w/c 18 June).

You will see that some of the questions raised concern the Ashdown Forest mitigation measures (with a number of references to the proposal for a Low Emission Zone), and the development sites that would benefit from the various infrastructure measures. As I’m sure you can appreciate, we have little information on these matters and will need your input. If possible, would you be able to provide us with a response on these matters by the end of the week?

As I’m going to be on leave on Thursday and Friday, could you copy both [redacted] into any response.

Kind Regards,

Dear [redacted]

**HIF/FF/000175 – East Sussex County – Accelerating Wealden Delivery**

Following our previous letter outlining the co-development process, we are contacting you to set out the next steps for working with you to take your project forward.

Homes England will be your primary point of contact building on our existing working relationships with you. Therefore, we have identified [redacted] as your Homes England Local Lead contact for HIF, with [redacted] as your Homes England Technical Lead contact for HIF.

We would like to meet with you to discuss your project to help us identify how best we can support you to develop your business case, and answer any questions that you have about how the process will work. Colleagues from MHCLG and Other Government Departments, including DfT, who have an interest in your bid will work with us throughout the co-development process and may attend our initial meeting.

Having reviewed your EOI, there are some key areas it would be helpful to discuss at our first meeting:

- The link between the proposed infrastructure interventions and the new homes unlocked
- Delivery timelines and key milestones for the project
- The financing strategy for the project

To help the discussion, we have attached more detail of the specific areas of your bid which we would like to explore further. This will help us to further understand your project, although we recognise that, at the initial meeting, we may not be able to cover every area we have highlighted for discussion.

We are currently looking into providing an offer of support to help you produce your economic case and further details of this will be made available in due course. To help us identify the level of support needed, please outline your progress to-date on assessing the economic benefits and costs of your projects. We are not planning to focus on the economic case in the meeting, so please send this information to
HIF@communities.gsi.gov.uk by 15th June Further detail is set out in the attached Annex.

We would like the initial meeting to take place as soon as possible and we will be contacting you over the next week to arrange a suitable time and venue. If you have any queries in the meantime, contact us either through your identified Homes England Local Lead or via HIF@homesengland.gov.uk.

Kind regards

[Signature]
Project Support
Homes England | HIF Team

[Signature]
Head of Planning and Environment
Communities, Economy and Transport

[Signature]
eastsussex.gov.uk

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You can visit our website at https://www.eastsussex.gov.uk
From: [redacted] eastsussex.gov.uk
Sent: 08 June 2018 14:12
To: [redacted]
Cc: [redacted]
Subject: RE: Housing Figures and Infrastructure

Thanks for the update.

I have tried to call but have had no luck. I look forward to receiving the revised figures but in the meantime a few queries:

Has there been any change in the total Plan number from when we last met: 14,250 dwellings?

Are you still expecting to publish the Plan and IDP at the end of June?

Also can you confirm that any additional allocations are on sites which ESCC officers have already considered and provided comments on previously as allocations or SHLAA sites? I know a lot of the increase is through windfall allocations for specific towns/areas rather than sites, but I seem to remember that Marina mentioned that there would be some additional allocations.

I am not sure what response (if any) we will be able to provide before the supposed deadline of the end of June. However as previously mentioned it would be useful to have the geographic breakdown ASAP so that we have time to consider what possible changes need to be made before the Plan and IDP are published for consultation which I believe you were aiming for late August. Is this still the case? Particularly education colleagues need time to run further forecasts which includes updating demographic projections.

Kind regards,

[redacted]

Principal Strategic Planner, Strategic Economic Infrastructure
Economic Development, Skills and Infrastructure Service
Communities, Economy and Transport

eastsussex.gov.uk

From: [redacted] wealden.gov.uk
Sent: 08 June 2018 07:54
To: [redacted]
Cc: [redacted]
Subject: RE: Housing Figures and Infrastructure

Apologies for the delay in responding to your email.

Unfortunately we are not yet in a position to send the revised figures as they have required detailed checking and assessment as well as reconfiguration to present them on a parish basis. I have forwarded on the query in relation to the extent of windfall development taking account of in the Transport Study to [redacted] for clarification.
I look forward to receiving the housing information for education colleagues by early next week.

Also in order to undertake the additional transport modelling work it would be useful to have ASAP your detailed comparison of the revised growth figures including employment floorspace and those used in the previous transport modelling work.

I also thought that it may be useful to have a brief meeting with either you, to understand more the changes to the figures and the additional transport work required. Let me know if you all agree and when would be a suitable date.

Kind regards,

Principal Strategic Planner, Strategic Economic Infrastructure
Economic Development, Skills and Infrastructure Service
Communities, Economy and Transport

eastsussex.gov.uk

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From: [REDACTED]<wealden.gov.uk>
Sent: 08 June 2018 15:55
To: [REDACTED]
Cc: [REDACTED]
Subject: RE: Housing Figures and Infrastructure

I have spoken to both [REDACTED] in the team and we have a confidential table that is presented by Parish (as attached), which has been used in communication with our Members in the lead up to preparing the Final version of the Plan. Please be advised that this is still being tweaked, and that there is currently an issue with Horam’s numbers (subject to small levels of change).

Just to confirm, the overall Plan figure of 14,250 dwellings is unchanged.

Regarding windfall delivery, I understood the windfall allowance to be higher in the Transport Plan. You will see from the table the windfall figures overall asks whether this can be take account of through the under delivery of housing in Eastbourne?

We still anticipate publishing the Plan at the end of June, then the IDP a little later in early July (subject to further change before we submit).

I am next back in the office on Tuesday and happy to discuss anything further then.

Kind regards

[REDACTED] BSc (Hons) MA MRPI | Senior Planning Policy Officer |
Wealden District Council | Council Offices | Vicarage Lane | Hailsham | East Sussex | BN27 2AX

ESCC28
From: [redacted]@wealden.gov.uk
Sent: 05 July 2018 11:35
To: [redacted]
Cc: [redacted]
Subject: RE: Housing Figures and Infrastructure

Hello [redacted]

Thank you for the e-mail.

The housing requirements for the Wealden Local Plan has been detailed within the Draft WLP at Appendix 2 (pages 547 and 548) so should assist with the Councillor’s queries in terms of clarification of the housing numbers by Parish. Please do not use the previously attached table for distribution as this is now out of date and we will be continually referring to the WLP as it progresses. We would obviously be happy for you to send/direct the Councillor to Appendix 2 of the WLP as this is now in the public domain.

In terms of the additional transport modelling work, as you are aware, neither myself or [redacted] were around at the time the last numbers were inputted into your previous transport modelling work. Therefore, it would be helpful to have a template or at least an idea of how you wish for this information to be presented so that the additional transport modelling work can run smoothly. If you have the information that was sent previously by our predecessor(s) then we would be quite happy to update this information also. If you have any queries on this aspect of the work, then it may be best to speak with [redacted] directly on this, as I am at slight disadvantage in terms of not being involved in the earlier work.

In terms of the meeting with yourselves, we do think this would be a good idea. In terms of a suitable dates, can I suggest that we meet after our Full Council date on the 18 July as a) we have limited times in our calendars to meet with you prior to that date and b) as the Plan goes through its committee/Full Council stages, there may be some small changes to the Plan that may affect the transport modelling work. Therefore, the week commencing 23rd July would be best for us if this is possible. The best dates/times that week would be 24th July am, 25th July pm and the 27th July. If any of those times suit, then please let me know and I will try and arrange a meeting room for this.

Kind regards,

[redacted]

[redacted] | Senior Planning Officer | Environment and Community Services
Wealden District Council | Council Offices | Vicarage Lane | Hailsham | East Sussex | BN27 2AX
[redacted]@wealden.gov.uk | Web. www.wealden.gov.uk/planningpolicy

From: [redacted]@eastsussex.gov.uk
Sent: 05 July 2018 10:18
To: [redacted]
Cc: Marina Brigginswath; [redacted]
Subject: FW: Housing Figures and Infrastructure

Hi [redacted]

As discussed please could you confirm that I can forward the attached table (with any additional tweaks as mentioned in email below) to [redacted] who has requested clarification on the housing numbers by parish.
I look forward to hearing from you shortly.

Kind regards

______________________________
Principal Transport Policy Officer, Strategic Economic Infrastructure
Economic Development, Skills and Infrastructure Service
Communities, Economy and Transport

eastsussex.gov.uk

From: [Redacted]
Sent: 06 July 2018 12:42 PM
To: [Redacted]; [Redacted]; [Redacted]; [Redacted]
Cc: [Redacted]
Subject: RE: Housing Figures and Infrastructure

Hi,

Thanks for pointing me to Appendix 2, that’s very helpful and sorry for not spotting it myself.

Regarding the latest transport figures used these were sent to [Redacted] on 28 April 2017 see attached spreadsheets which relate to the tables in the Transport Study (also attached) Tables are 2.2, 2.3 and 2.4. (pages 5,6,7) Development locations are shown in Figure 2.2 (page 8). Also in the Transport Study Dec 2016 permissions were added to [Redacted] Table 2.3 and outlined in Appendix B (also attached).

I will also forward the email that [Redacted] sent separately as it is archived, hopefully you will be able to open the documents and it may be of further assistance on the information previously provided, it includes information on permissions and completions. (Note: some of the table formats and geographic scope I think date back to the original SWETS work in 2010 which I wasn’t involved in, but Marina might be able to confirm this.)

Hopefully you will be able to make sense of this all, but let me know if anything is unclear.

Unfortunately [Redacted] is not working today so I am unable to confirm the best date for a meeting, though looking at her calendar it appears that Tuesday 24 July am is the most appropriate for us but I will confirm this early next week.

Kind regards,

______________________________
Principal Strategic Planner, Strategic Economic Infrastructure
Economic Development, Skills and Infrastructure Service
Communities, Economy and Transport

eastsussex.gov.uk
-----Original Message-----
From: [redacted]@wealden.gov.uk
Sent: 6 September 2018 11:30
To: [redacted]@eastsussex.gov.uk; [redacted]@eastsussex.gov.uk; [redacted]@eastsussex.gov.uk; [redacted]@wealden.gov.uk
CC: [redacted]@wealden.gov.uk
Subject: RE: Confidential Draft Interim Air Quality Mitigation Strategy - Tariff Guidance

Hi 

There is a push to publish the tariff guidance tomorrow. Any chance in receiving the comments that you mentioned by COP today or sooner if you can?

Sorry to chase........

Kind regards

[redacted]

[redacted] BSc (Hons) MA MRTP | Planning Policy Manager | Environment and Community Services
Wealden District Council | Council Offices | Vicarage Lane | Hailsham | East Sussex | BN27 2AX
[redacted]@wealden.gov.uk | Web.
www.wealden.gov.uk/planningpolicy

-----Original Message-----
From: [redacted]
Sent: 29 August 2018 14:13
To: [redacted]@eastsussex.gov.uk; [redacted]@eastsussex.gov.uk; [redacted]@eastsussex.gov.uk; [redacted]@wealden.gov.uk; [redacted]@wealden.gov.uk
Subject: RE: Confidential Draft Interim Air Quality Mitigation Strategy - Tariff Guidance

Hi 

ESCC31
Thank you for letting us know. That is really helpful. We will share with partners and let them know that the document / tariff is pending ESCC comment. Hope that way forward is ok with you?

Kind regards

From: @eastsussex.gov.uk
Sent: 29 August 2018 14:10
To: @wealden.gov.uk; @eastsussex.gov.uk;
Cc: @eastsussex.gov.uk
Subject: RE: Confidential Draft Interim Air Quality Mitigation Strategy - Tariff Guidance

Hi

are meeting tomorrow morning to have a look through and discuss – we should be able to get some initial comments back to you later on in the day.

Kind Regards,

Head of Planning and Environment
Communities, Economy and Transport
eastsussex.gov.uk

Hi all

We will be sending the Draft Tariff to other partners at COP today. Apologies for our short timescales but if you have any initial comments on the Draft document or cash flow spreadsheet it would be helpful to know. Alternatively, if you can let me know if you are able to provide feedback / comments by COP Thursday then that would be helpful. There is an aim to publish the tariff document early next week.

Kind regards
Dear all

Thank you for meeting with us yesterday. Please find attached the above confidential draft. I have also attached the mitigation and cash flow spreadsheet. This is also provided on a confidential basis.

Your comments / input on both are very welcome as discussed yesterday.

We are due to provide the tariff guidance as a confidential draft on Wednesday to other partners. I recognise the short working week next week, but if you are able to provide any comments by COP Tuesday it would be really helpful to us. We can of course refine after Tuesday if necessary prior to publication.

Thanks and regards and have a good weekend

BSc (Hons) MA MRTP| Planning Policy Manager | Environment and Community Services
Wealden District Council | Council Offices | Vicarage Lane | Hailsham | East Sussex | BN27 2AX
@wealden.gov.uk | Web.
www.wealden.gov.uk/planningpolicy
Good morning

Further to our meeting on 6th December re site specific access and local transport assessments for allocated sites. I attach a table of sites identified within the ESCC representation to the Regulation 19 Wealden Local Plan with details of SHEELA information concerning the site and any representations made by developers/promoters. Can you let me know which sites you wish us to progress and what level of detail you require. Owing to GDPR we are unable to share personal data and therefore we will need to contact individuals to progress this matter further.

Kind regards

Marina Brigginshaw BSc (Hons) MA MRTPi | Head of Policy and Economic Development | Wealden District Council | Council Offices | Vicarage Lane | Hailsham | East Sussex | BN27 2AX
@wealden.gov.uk | Web. www.wealden.gov.uk
We’ll get it to you next week.

Cheers

---

Hi

As soon as you are able. I think we can progress without it for the timebeing, but if we can put it into the set of maps by end of March that would be helpful.

Thanks

I’ll review today and await your input on Monday.

By the way when do you need the Willingdon catchment shape file?

Cheers

---

Morning,

Thank you for the meeting yesterday – it was very helpful. I am attaching two short sections nne has the flood risk policy (which includes SuDs stuff) and the
Sorry – missed an important bit out.

See highlighted change

---

From: WDC  
Sent: 27 February 2017 13:50  
To: ESCC  
Subject: Wealden LP - LLFA comments

Hello both

Some observations on the drafts you kindly provided:

**Section 40  Climate Change**

The SFRA identifies surface water flooding as the principal flood risk to the district. However, the reasoned justification for CC1 appears to downplay surface water risk despite devoting a number of paragraphs to the issue.

With this in mind I suggest that para 40.7 is altered to the effect of replacing the first sentence with: *Whilst the significance of fluvial and coastal flooding is recognised, surface water flooding has been identified as a widespread risk throughout the District. In parts of the district this is exacerbated by the presence of high ground water and impermeable ground conditions in many parts of the District. Consequently Flood Zone1 does not indicate an absence of risk.*

Provide a definition of groundwater flooding. *Groundwater flooding occurs as a result of water within underlying soil rising up to the surface. This usually happens during long periods of sustained high rainfall.*

Paragraph 40.9  add a sentence along the lines of – *There are locations within the District where greenfield run off rates are unusually high due to underlying geology and topography, and in these areas the District Council, in consultation with the LLFA, will look to improve upon greenfield run off rates to limit the flashy response of catchments to rainfall.*

Paragraph 40.14 – “the following” or “including”? if the former add Uckfield.

Paragraph 40.15 – the Eastbourne Lakes, as I understand it, need to be assessed following almost three decades of neglect. Currently, there is no indication that they cannot function adequately in their present state. The issue is that we do not know how far their design
Apologies for the delay in getting back to you on the draft SFRA but end of year has proved to be more of a distraction than it usually is.

As per our conversation I will keep my comments brief as I don’t want to generate any additional unnecessary work.

As a general observation I remain very frustrated with the inadequacies of national policy and guidance. It’s as if the Pitt review never happened.

Section 2.2.2 PFRA – this section notes that there were no FRAs in the county when we undertook the PFRA in 2011. Whilst this is true, it does underplay the significant coalescence of risk in southern Wealden. We are reviewing the PFRA, Eastbourne and Hastings are designated FRAs this time – the presence of risk in Southern Wealden remains.

The attached shows a heat map of flood incidents and risk in the county with the 2017 PFRA at risk squares – for illustrative purposes only.

Table 2.1 – move “acting consistently with LFRMS etc.” from LLFA section to LPA section.

Figure 2-3 I would disagree with the way in which this the roles are represented. It is not entirely accurate. However, it is not wildly inaccurate and consequently I am prepared to live with it given the limitations on time and budget.

Section 3.1 Flood Zones – this needs to make it clear that this applies to Rivers and Sea flooding and no other form of flooding. The assumption that everything is fine in FZ1 is a misunderstanding which the government is unwilling to address. The consequence is that SFRA and local plans repeat the error. Given that the SFRA states that the biggest risk in the district is the risk of localised flooding/groundwater the traditional use of FZs is far from helpful.

The final para in section 3.4.1 goes some way to address the above point – can it be brought into starker relief?

Figure 6-1 This map is little at odds with our understanding of risk in the county. For example Five Ashes and Cross in Hand are at the lowest risk in county. However, our work and that represented in the SFRA have differing methodologies.

Section 9.2 – we probably need to say something along the lines that the LLFA will seek to work with WDC to identify Areas of Critical Drainage Concern where both major and minor development will have an impact on local forms of flooding.
Will also need to include some words on the Pev and Cuck WLMB’s role in commenting on planning applications.

Section 11.1 – should include a reference to consulting the LLFA on drainage and localised flooding matters if clarification is required.

Flood zone 1 recommendation – final bullet point – replace “should” with “must”

I’ll be back in next Tuesday if you have any questions.

Regards

[Signature]

Team Manager
Flood Risk Management

eastsussex.gov.uk

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performance has deteriorated, rather than an acknowledged need to upgrade them – if this sentence is kept I would suggest “refurbishing” to replace “upgrading”.

Would it be appropriate to include the Pevensey and Cuckmere WLMB here as well? I believe that the byelaws will be approved by Defra this week – see attached.

Policy CC1 – suggest the following changes

f) It should be demonstrated through a Surface Water A Drainage Strategy, prepared in accordance with the advice provided by the LLFA, should demonstrate that the proposed drainage scheme, site layout and design, will prevent properties from flooding from surface water, including at construction phase, allowing for climate change effects. The Strategy should also show that flood risk elsewhere will not be exacerbated by increased levels of surface runoff. Consideration must also be given to residual risk and maintenance of sustainable drainage and surface water systems;

Add “Uckfield” to criterion k

Section 41 Environmental Control

I am aware that paragraph 41.3 does make a connection between SuDS and water quality, however it may worth mentioning that the Water People Places guidance provides advice on how that may be delivered.

Happy to help with the refinement of the text as the plan progresses.

Regards

Team Manager
Flood Risk Management

eastsussex.gov.uk

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Environmental Control policy which the last policy relates to WFD.

I am happy for you to look at both and make any suggestions in text/policy. Happy for you to add in about the By Laws in the text too. Because the Pevensey Levels relates to the Habs Regs there is an earlier policy in the plan about this. This is also relevant. I am going to review it as it is not specific as to what we want to achieve and I was thinking about:

The creation of impermeable surfaces within the Pevensey Levels Catchment Area will require mitigation, in the form of sustainable drainage systems, to control the quality and volume of surface water run-off to a level to avoid a likely significant effect on the SAC and Ramsar Site.
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