Hearing Statement on Wealden District Council’s Proposed Submission Local Plan

Inspector Nurser, thank you for giving me the opportunity to make this statement.

As per your guidance notes, this statement relates to the whole plan but primarily to Policy WLP1, which is unsound because it is out of accordance with national planning policy and is unsafe.

I write this, having spent most of my life in Wealden District and as someone who cares deeply about its future, in some despair. I am not so naïve as to think that this representation will have any impact on the outcome of your hearing and the rules of the process may even allow it to be ignored. However for the record and on behalf of the voiceless, both human and non-human, in this process, I submit the following.

The plan proposes to increase the number of households in Wealden District by 14,228 homes (or approximately 23%) by 2028, with nearly all of the development on greenfield sites. Wealden District Council have spent many hundreds of hours of work, commissioned numerous studies, backed up by a raft of reports and written thousands of pages, which try to demonstrate that the development proposed is sustainable, as is the central requirement of National Planning Policy.

I hope you would agree that the following is a good definition of the term “sustainable development”:

*Development that meets the needs of the present without compromising the ability of future generations to meet their own needs*

With this definition in mind I would like to ask you to consider the following questions:

1. Greenfield development replaces soil and vegetation with tarmac, concrete, bricks and mortar thereby releasing stored soil carbon into the atmosphere as CO$_2$ and permanently stopping future capture of CO$_2$ and storage of carbon by the soil. How is this sustainable in a world where man-made CO$_2$ emissions are causing global warming at a rate which threatens the very future of mankind?

2. Greenfield development kills large quantities of soil life (as an organic farmer I know that each hectare of pastureland contains upwards of 10 tonnes of soil life) as well as the plant and animal life above ground level. How is this sustainable in an ecosystem where the majority of UK wildlife is declining and an increasing number of species are threatened with extinction (State of Nature 2016)?

3. Greenfield development permanently destroys farmland. How is this sustainable in a country whose food production is in decline and which now only produces half of its own food consumption?

4. Greenfield housing development results in enormous financial rewards, much of which becomes concentrated into the hands of a very few people: landowners, speculators and executives of development companies. How is this unfair re-distribution of natural capital sustainable in an economy where there is a high and rising wealth gap between rich and poor and food bank use in towns like Hailsham is rising year on year?
5. The development proposed by the plan will significantly increase the population of the district. How is this sustainable in a district where

   a. The transport system is inadequate, with overcrowded trains and increasing road traffic jams and bottlenecks, particularly in the South Wealden area?
   
   b. The rate of road accidents is significantly higher than the regional average: “Wealden has twice as many people killed or seriously injured on its roads per 10,000 of the population compared to East Sussex as a whole which highlights this as an issue for the District.” (Section 3.30, Proposed Submission Local Plan 2018) and “Evidence produced by an independent research company – Road Safety Analysis – places the roads in Wealden as the fifth most dangerous district in Britain (n = 379) for young drivers”. (From Driving the Message Home – a review of road safety in Wealden, WDC 2014)?

   c. Air pollution frequently exceeds recommended daily limits for PM2.5 particulates and yearly limits for Ozone (2018 Air Quality Annual Status Report, WDC) and the Ashdown Forest is suffering the effects of high nitrogen pollution?

   d. The health service is over-stretched, with problems in hospitals due to overcrowding (East Sussex Healthcare NHS Trust, Care Quality Commission inspection report, March 2018 – see Appendix 1)?

The above issues have been either ignored, under-played or contradicted in the plan. The over-riding objective seems to be to meet housing target numbers. The justification in terms of sustainable development has been achieved by reducing the scope of the term to a narrow set of principles which can be achieved in a self-fulfilling way. The use of the term ‘sustainable development’ by the plan is firmly in the realms of Orwellian doublespeak.

Not only is the plan’s development unsustainable, it is also undemocratic. Most residents do not want greenfield development. In the last poll I can find which Wealden District Council undertook of its residents on this subject, shamefully more than 18 years ago, (Report on Public Consultation Feb-May 2000, WDC – Appendix 2), only 12% of respondents wanted greenfield development whereas 97% wanted brownfield development. The plan represents the reverse of that very clear mandate.

The solution to the housing shortage should not involve destroying fields. There is little emphasis on brownfield development in the plan. “Reduce, re-use, recycle” – this excellent maxim can be applied to housing as well consumer goods. As well as conventional brownfield development, here are three more suggestions:

1. Internet shopping is resulting in many town centre commercial premises becoming available for conversion to residential accommodation – great places for building new affordable apartments for young people and regeneration of the town centre at the same time.

2. There are large areas of low density housing (eg single storey bungalows) in the district, where incentivisation to merge or extend properties, upwards and outwards, would provide great opportunities for both family and retirement accommodation.
3. There is a huge accommodation surplus in existing under-used property: according to the English Housing Survey more than 1/3rd of existing owner-occupied properties are under-occupied and the Intergenerational Foundation has estimated that there are 25 million empty bedrooms nationally.

What a waste to be building on green fields when there is so much existing developed potential. If this plan was serious about sustainable development, brownfield options such as those above would be its main focus.

It has taken the plain speaking of a young girl (Greta Thunberg) to wake us up to the climate emergency. In her words, young peoples’ future is being stolen right in front of their eyes. Sadly those hard-hitting words apply here. This plan will continue the plundering of our fast-depleting natural capital which the district has suffered in recent decades and will leave a more unaffordable, unhealthy, unsafe and environmentally degraded district for our young people to inherit. Amazingly, it will be done under the banner of “sustainable development”. Inspector Nurser, you are now the only person standing between this travesty of planning and its dangerous and harmful implementation. Please do not let the residents of Wealden down, please find this plan unsound, on the basis that the development is not sustainable.

Paul Lovatt Smith, 1 May 2019
APPENDIX 1

Evidence of overcrowding in East Sussex Hospitals from East Sussex Healthcare NHS Trust, Care Quality Commission inspection report, March 2018

Compiled by Paul Lovatt Smith, August 2018

The trust was rated as “requiring improvement”, which was the same as the previous inspection.

The following are quotes from the report.

Overall Trust

“At the last inspection undertaken in 2016, the trust was found to be in breach of the following regulations under HSCA(RA) Regulations 2014. These were: Regulation 18 – Safe staffing.”

“The trust was placed in Quality Special Measures following the CQC inspection in 2015. The inspection visit in October 2016 found improvements had been made in many areas but the changes were too recent to demonstrate that the improvements were embedded in practice. The trust remains in Quality Special Measure and was also placed in Financial Special Measures in 2016.”

“The referral to treatment times and the trust’s ability to meet some key performance indicators remained a challenge.”

“Waiting times for some specific appointments had worsened slightly. This included the number of patients waiting less than 13 weeks from a musculo-skeletal or a dietetic referral.”

“The trust struggled to meet the maximum two month (62-day) wait from urgent referral for suspected cancer to the first definitive treatment for all cancers. They had a rolling 12 month average of 77.1% against a target of 85%.”

Conquest Hospital, Hastings

Urgent and Emergency Services p. 26:
“The Royal College of Emergency Medicine recommends that the time patients should wait from time of arrival to receiving treatment is no more than one hour. The trust did not meet the standard for 10 of the 12 month over the time period from December 2016 to November 2017.”

“The Department of Health’s standard for emergency departments is that 95% of patients should be admitted, transferred or discharged within four hours of arrival in the emergency department. The trust breached the standard in every month from January 2017 to December 2017.”
Medical Care p. 35:
“Staff told us that patients were sometimes admitted to other parts of the hospital because of pressure on bed capacity.”

Surgery p. 41:
“Staff told us it was common for medical patients to be cared for on surgical wards, due to a lack of beds on medical wards.”

Eastbourne District General Hospital

Urgent and Emergency Services p.55
“Although nurse vacancies were relatively low we found significant impact of the department working consistently over capacity. This included cancelled training and the loss of newly qualified nurses after a short period of time.”

Urgent and Emergency Services p.59
“Although the mental health liaison team provided by a local mental health trust offered dedicated support, they were limited by capacity and the scope of the service.”

“A dedicated children’s waiting room was not always used for its intended purpose when the department was busy. For example, we saw this space was regularly used by adults and some children needed to sit on the floor because of a lack of space and seats.”

“The trust breached the RCEM standard that 95% of patients should be admitted, transferred or discharged within four hours of arrival in the emergency department in every month from January 2017 to December 2017”

“Between December 2016 and November 2017 the trust did not meet the Royal College of Emergency Medicine standard that patients should wait no more than one hour from time of arrival to receiving treatment in 10 of the 12 months.”
1. **BACKGROUND AND OBJECTIVES**

Wealden District Council are currently planning for the future development of their district. Land must be found for 3,300 more homes, as well as for more jobs and community facilities over the next ten years.

The aim of the survey was to gauge where householders would prefer new housing before sites are chosen for the development and what issues are important with regard to travel and jobs.

2. **METHODOLOGY**

A postal survey was undertaken whereby Wealden District Council designed, printed and despatched questionnaires to all households in the district as part of a leaflet.

61,000 questionnaires were sent out and a total of 9,448 completed questionnaires were returned to Wealden District Council and forwarded to Field2Data for data processing and analysis. This represents a response rate of 15%. This number of responses is robust enough for the purpose of statistical analysis.

3.2 **Type Of Site Where Homes Should Be Built**

Respondents were asked to give their level of agreement on the types of site they would prefer to see new homes built.

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<th>Agree</th>
<th>Disagree</th>
<th>Don't know</th>
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<td>97%</td>
<td>2%</td>
<td>1%</td>
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<tr>
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<tr>
<td>'Greenfield' sites</td>
<td>12%</td>
<td>9%</td>
<td>79%</td>
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</table>

Base: all answering (7721 - 91000)

This reflects the build in Charing at Great and Woolbeding.