WEALDEN LOCAL DEVELOPMENT FRAMEWORK CORE STRATEGY
SUPPORTING STATEMENT BY EAST SUSSEX COUNTY COUNCIL
FOR EXAMINATION IN PUBLIC

1. Introduction

1.1 East Sussex County Council (ESCC) welcomes the publication of the submission version of the Wealden Core Strategy and supports Wealden District Council and South Downs National Park Authority (SDNPA) – the Planning Authorities - in their partnership approach to delivery of the Core Strategy.

1.2 The County Council considers the Core Strategy to be a sound document, appropriately prepared and based upon a robust evidence base. The comments offered below relate in particular to the close working with county infrastructure providers in testing the various levels and distribution of growth within the Strategy and in ensuring, as a key provider, that the County Council is putting in place the necessary implementation plans to help deliver infrastructure to support the levels of growth proposed. The comments below seek to address the particular concerns raised by the Highways Agency (HA) in their Regulation 27 response to the Core Strategy and with regards the delivery of transport infrastructure and interventions. This statement also addresses other key elements relating to education provision and development of a Community Infrastructure Levy (CIL). We have also set out the close relationship between the core strategy and our developing work on the Local Transport Plan (LTP).

1.3 It is recognised that some further detailed work is required on those infrastructure requirements that are the responsibility of the County Council, in particular on education and transport. This work is currently being undertaken or commissioned and will form, through subsequent development stages of the Local Development Framework, key components of the Councils Strategic Sites Development Plan Document (DPD). We will continue to work closely with the District Council on the implementation and delivery of such Infrastructure to support their Strategy.

2. Infrastructure and CIL

2.1 Infrastructure

2.1.1 The County Council has responsibilities for many of the major public services provided to communities across Wealden District. The County Council has, therefore, provided several iterations of advice to the District Council regarding the infrastructure that will be required to continue the delivery of those public services in the context of the level and broad distribution of growth proposed by the submission draft Core Strategy. The IDP accompanying the Core Strategy reflects that advice. ESCC is confident that the necessary identified infrastructure, that is a county responsibility, can be delivered within the timeframe of the Core Strategy and in a timely fashion to support the growth identified within the Strategy.

2.1.2 The County Council infrastructure requirements, as set out in the IDP, include needs for significant investment in transport infrastructure and additional secondary and primary education capacity. Since the next stage of the Planning Authorities’ LDF will be a Strategic Sites DPD, which will in effect act as a masterplan for growth within each broad strategic development area identified within the Core Strategy, broad
proposals for providing that additional capacity, including potential locations, will emerge as part of the regulation 25 consultations on the SPD.

2.1.3 Transport infrastructure investment will be required to support the proposed housing growth. Transport modelling has been carried out for the south Wealden area (South Wealden and Eastbourne Transport Study – SWETS) and also for Uckfield as these are the areas where most significant growth is proposed. The SWETS studies have been jointly commissioned by Wealden District and Eastbourne Borough Councils to take account of cumulative effects from the core strategies of both of those Councils. As a result the need for a number of transport interventions has been identified at a number of locations which are set out within the IDP. We are currently working with a number of key major developers to identify and cost design solutions to address these needs which are outlined in more detail in the sections below. We are committed to working with Wealden District Council and developers in the development of their Strategic Sites DPD and identifying costed design solutions for each of the individual transport site infrastructure requirements.

2.1.4 The County Council strongly supports the principle of policy WCS5 (Managing the release of land) and which requires that the release of land is to be dependent upon the timely provision of infrastructure necessary to deliver housing. The County Council also supports the need for reviews of the Infrastructure Delivery Plan, as both needs and funding streams are subject to change, and this may lead to necessary adjustments in the pace of housing delivery and prioritisation of schemes. The County Council is happy to help Wealden to continually keep the Infrastructure Delivery Plan up to date from the perspective of County managed and provided infrastructure.

2.1.5 The County Council also strongly supports policy WCS7 (Infrastructure). In particular it considers that it is important that the release of land for development will be conditional upon there being sufficient capacity in the existing local infrastructure to meet the requirements generated by the proposed development, or that there is an agreed programme for delivery of new infrastructure which will ensure that improvements are provided at the time they are needed. This will entail close working between partners including with the development industry. As indicated in 2.1.3 above, work on this is already underway and from those discussions the County Council believes that there is both certainty and willingness to appropriately contribute and deliver within the period of the Core Strategy.

2.2 Community Infrastructure Levy

2.2.1 A Community Infrastructure Levy (CIL) Working Group has already been set up involving all the Boroughs and Districts in East Sussex, including Wealden District Council, Brighton & Hove City Council and the South Downs National Park to scope the potential for sharing the technical work required to support the preparation of CIL Charging Schedules and to develop CIL charging regimes before April 2014. This work will enable viability assessments of levels of contributions to be tested to meet the identified funding gaps, to provide the critical infrastructure to support growth.

2.2.2 The timetable for the overall work of the group, some elements of which may vary between CIL Charging Authorities, is to:
Wealden Local Development Framework Core Strategy
Supporting Statement by East Sussex County Council for Examination in Public

<table>
<thead>
<tr>
<th>Work Element</th>
<th>Timetable</th>
</tr>
</thead>
<tbody>
<tr>
<td>• Review level of development to be provided in LDF Core Strategy (post SE Plan)</td>
<td>December 2011</td>
</tr>
<tr>
<td>• Each charging authority area assess Infrastructure Delivery Plans for identifying new infrastructure necessary to support planned level of development.</td>
<td>WDC's IDP has been Completed)</td>
</tr>
<tr>
<td>• Commission Viability Study</td>
<td>February 2012</td>
</tr>
<tr>
<td>• Undertake Viability Study to:</td>
<td>February – July 2012</td>
</tr>
<tr>
<td>o assess sources of funding for each item of key infrastructure and whether CIL is appropriate to plug gaps</td>
<td></td>
</tr>
<tr>
<td>o Identify overall levels of cost for CIL – related development</td>
<td></td>
</tr>
<tr>
<td>o Calculate initial CIL “base rate” across the area (per m² of new floorspace) or for each charging authority</td>
<td></td>
</tr>
<tr>
<td>• Carry out CIL viability assessment to test and refine base rate by types of different for which CIL may be levied and appropriate geographical area</td>
<td></td>
</tr>
<tr>
<td>• Each CIL Charging Authority to set draft charging schedule</td>
<td>July- December 2012</td>
</tr>
<tr>
<td>• Public consultation on draft CIL Charging Schedule</td>
<td>Autumn 2012 / Winter 2013</td>
</tr>
<tr>
<td>• Submit CIL Charging Schedule to Planning Inspectorate for examination</td>
<td>Spring 2013</td>
</tr>
<tr>
<td>• Formal CIL Charging Schedule examination and receipt of Inspector’s report</td>
<td>Summer 2013</td>
</tr>
<tr>
<td>• Formal adoption and introduction of CIL Charging Schedule</td>
<td>Autumn 2013 onwards</td>
</tr>
</tbody>
</table>

2.2.3 In conclusion it is considered that the levels of growth proposed in Wealden's (and Eastbourne's) strategies, coupled with the agreed programme for adoption of a CIL charging regime, will enable a considered programme and funding schedule to be in place in good time to provide the necessary infrastructure. The County Council, as highway authority and education authority is committed to ensuring implementation in a timely fashion as required by Policies.

3 Transport

3.1 Local Transport Plan

3.1.1 The HA in their Regulation 27 response to the Core Strategy highlights the need to ensure that the strategies in the development plan and the local transport plan are complementary.
3.1.2 The County Council’s Local Transport Plan 2011 – 2026 (LTP) was adopted in May 2011. This followed an extensive consultation process and the comments received from Wealden District Council and other stakeholders have helped shape the final strategy. Wealden’s formal response to our draft LTP3 document is attached as Annex 1.

3.1.3 The LTP comprises of a high level strategy document and a series of shorter term Implementation Plans. These will give greater clarity on the timescales for delivery of infrastructure, which will be influenced by the levels of funding that will be available over the duration of the plan, and as appropriate, align with Infrastructure Delivery Plans of constituent Districts and Boroughs.

3.1.4 The LTP Strategy has five high level objectives:

- improve economic competitiveness and growth;
- improve safety, health and security;
- tackle climate change;
- improve accessibility and enhance social inclusion, and
- improve quality of life.

3.1.5 These objectives closely align and compliment with the following Core Strategy spatial planning objectives:

- SPO3 (Need for homes and economic prosperity)
- SPO6 (Support growth of Wealden economy)
- SPO7 (Sustainable transport)
- SPO9 (Adapt and mitigate to climate change)
- SPO12 (Safer Wealden)
- SPO13 (Development of high quality, safe and attractive living environments)

3.1.6 In response to the HA’s concerns raised in their representations, ESCC supports the overall strategic planning objective SPO7 (Sustainable Transport) as appropriate within the Core Strategy relating to promoting sustainable travel and reducing the need to travel by car which reflects the overall objectives of LTP. Meanwhile, SPO12 sets road safety in the broader context of community safety and reflects the wider focus of the LTP objective to ‘Improve safety, health and security’ on reducing the number and severity of road crashes and improving personal security. Therefore, ESCC feels that these policies and policy objectives adequately and appropriately address the HA’s concerns on the lack of a specific transport policy for Wealden.

3.1.7 The LTP Strategy identifies that the County Council will need to:

“continue to work with the Borough and District Councils on the identification of transport infrastructure for inclusion in the Infrastructure Delivery Plan (IDP) element of their Local Development Frameworks, which also needs to be reflected in our LTP long term strategies for the priority areas of the county (which includes Eastbourne and South Wealden) and shorter term LTP Implementation Plans. The levels of housing growth will be a key driver of the demand for infrastructure and increases in land values will provide the means for development to make its contribution to infrastructure provision. The development industry will need to assume responsibility for delivery of the necessary infrastructure in a timely fashion”.

3.1.8 As highlighted in section 1 and 2, ESCC will continue to work with Wealden and the development industry on the implementation and delivery of the Strategy, and ensure the linkages between the Core Strategy Infrastructure Delivery Plan and the LTP Implementation Plans continue not only to be made but also to be implemented.

3.1.9 The approach set out in the LTP Strategy for south Wealden clearly identifies the need to facilitate housing growth; create a more diverse and integrated economy; protect the local environment, enhance social inclusion and create sustainable communities. The strategy approach reflects and supports the overall objectives for the south Wealden settlements and an assessment of the proposed development coming forward through the LDF (see section 3.2) which has identified the most effective package of measures to deliver housing and sustainable economic growth in the area.

3.1.10 These include:

- a package of long term strategic and local improvements to key junctions on the A27, A22 and A271 corridors around Polegate, Hailsham, Stone Cross and Pevensey;
- relieving congestion in Hailsham town centre and the Battle Road, London Road and High Street corridors in the town;
- improving access for pedestrians and cyclists and public transport users as well as traffic movement in Hailsham town centre;
- supporting the development of a Quality Bus Partnership focused on improving services and infrastructure on key corridors including:
  - Eastbourne to Polegate/Hailsham including Eastbourne – Hailsham express bus service.

3.1.11 This wider approach for the South Wealden area reflects and supports the area strategies in the Core Strategy for Polegate, Willingdon and Stone Cross and Hailsham/Hellingly. Further detail on the work currently being undertaken in the south Wealden area is set out in 3.2 and 3.3 of this statement.

3.1.12 The approach for Uckfield in the LTP Strategy identifies that the highway network is already very near capacity, resulting in town centre congestion issues, and that it will struggle to accommodate the traffic generated by existing permissions and future housing proposed in and around Uckfield. LTP identifies that to address this issue an appropriate traffic management solution is to be developed and implemented in the town centre. This approach reflects the need to provide “through the Site Allocations DPDs, a detailed scheme to reduce congestion” as set out in the Uckfield area based strategy in the Core Strategy. Further detail on the work currently being undertaken to implement such measures in Uckfield is set out in 3.4.

3.2 South Wealden (Polegate and Hailsham) allocations

Road network

3.2.1 The County Council is somewhat surprised by the response of the HA given their awareness of the work undertaken by the SWETS modelling since its inception in January 2010 and their own comments submitted in April 2011 which confirmed their broad endorsement of the methodology and findings of SWETS. Further to the HA’s concern in their Regulation 27 response, ESCC can confirm that the modelling work
undertaken as part of the South Wealden and Eastbourne Transport Study (SWETS) and the supporting evidence set out in the various accompanying technical reports has helped to test and inform the development of the Wealden Core Strategy. The modelling work has identified that the housing and employment allocations in the south Wealden area will require implementation of a number of capacity creating transport interventions on the strategic road network, but that these can be accommodated. These include:

- improvement of the A22(T)/A27/A2270 and Cophall Farm junctions on the A27 trunk road;
- improvement of the A27/Jubilee Way (A22) and Dittons Road/Jubilee Way (A22) junctions;
- the development of a quality bus corridor from Polegate into Eastbourne; and
- the development of an express bus service from Hailsham to Eastbourne.

3.2.2 These additional proposals as identified through the SWETS modelling are required to address the unacceptable levels of congestion on the strategic road network that would occur in the later part of the Plan period, compromising the economy of the Sussex Coast sub region as identified in the Regional Strategy.

3.2.3 Preliminary designs and costings for some of these interventions are being developed with support from the major / significant developers and their agents whose strategic growth areas are considered critical to delivery of the Core Strategy in Wealden’s Infrastructure Delivery Plan. Further work will be undertaken during 2012/13 and 2013/14 by the County Council as required as part of the development of the Planning Authorities’ Strategic Sites DPD and CIL work to develop these strategic and other localised interventions into deliverable, designed and costed schemes.

3.2.4 As highlighted in paragraph 10.3 of the Planning Authorities response to the Inspector’s concerns, developer contributions of circa £1 million have already been secured by Wealden District Council through section 106 agreements from existing permitted development in the area to help deliver these interventions/improvements to the trunk road network. These have been collected at the request of the HA and which they are presumably aware of.

3.2.5 As reflected in the County Council's comments on the IDP, further contributions will be secured from planned growth in the South Wealden area to enable these interventions, which are identified as critical infrastructure in the Core Strategy's Infrastructure Delivery Plan and previously identified in Wealden’s Non-Statutory Plan, to come forward in a timely manner. Notwithstanding the Highway Agency’s concerns as outlined in their Regulation 27 response to the Core Strategy, there appears to be reasonable certainty that these schemes will be delivered and from our more detailed recent work and discussions with developers, we have no evidence to indicate that these identified interventions are not deliverable within the timeframe of the plan.
Public Transport/Sustainable Transport

3.2.6 As identified in 3.2.1 above, in south Wealden an overarching transport issue contingent with the employment and housing allocations in the area is the need to increase public transport connectivity and capacity between Eastbourne, Polegate and Hailsham along with links out of the area to the rest of the south east. Current poor performance of the public transport network is inhibiting spatial growth and diversification of the economy and will work against the shared ambitions of Eastbourne, Wealden and the County Council to secure economic growth and regeneration.

3.2.7 In response to the HA’s concerns on ensuring sustainable transport infrastructure comes forward alongside development, the introduction of a quality bus corridor has been identified as a key infrastructure requirement in Wealden’s Infrastructure Delivery Plan to support their Core Strategy. This again reflects our emerging LTP and the complementarities between the two strategies. This corridor will aim to improve the punctuality and reliability of bus services between Hailsham and Eastbourne and providing an interchange with rail services at Polegate, which then provides transport connections to London, Brighton and Hastings/Ashford. For those who have expressed doubts about this provision on the basis of lack of physical space, it is emphasised that the provision of a quality bus corridor between Hailsham and Eastbourne does not necessarily mean long lengths of bus lanes, although this may be considered where practical, but may also include measures such as signalised bus priority at junctions along the corridor, improved bus waiting infrastructure and better pedestrian links to bus stops which improve the overall end of end journey for users.

3.2.7 Walking and cycling infrastructure, linking planned development into existing networks, supporting the integration of specific sites into local communities and providing sustainable access to jobs and services, will be considered as part of the development of the Strategic Sites DPD.

3.3 Hailsham

3.3.1 The Wealden Non Statutory Local Plan when allocating land for development in Hailsham required that new development should be located so as to reduce the need to travel, especially by car, provide for the travel demands that it creates and maximise the potential for access by public transport, cycling and walking. Similarly Wealden’s emerging Core Strategy allocates further land for housing development in Hailsham, subject to the provision of development contributions to provide necessary highway and transport infrastructure.

3.3.2 The Wealden Core Strategy recognises that traffic congestion creates problems in Hailsham town centre and any additional traffic generated by development will require interventions through demand management techniques and alterations to the transport network around the town. Opportunities to increase connectivity, particularly for pedestrians, cyclists and public transport will also increase the potential regenerative benefits for the town/town centre. To date, the following contributions totalling £1.485m have been secured towards bus services/infrastructure from developments in Hellingly and Hailsham.
£625,000  Hellingly Hospital  towards bus services between the site, Hailsham and Polegate.

£460,000  Welbury and Woodholm  towards bus priority on A2270 and Hailsham town centre improvements

£360,000  East of Battle Road  towards bus services/infrastructure around town and to Polegate or Hailsham town centre improvements

£40,000  Battle Road (Amberstone)  towards bus services

3.3.3 In addition, £240,000 has been secured from existing permissions towards sustainable travel measures in the town. This detail confirms the County Council’s view that working with developers can, and indeed will, enable necessary delivery. We see no reason that this success cannot continue to deliver within the timeframe of the Core Strategy and the identified growth. It is however important to stress our support for the necessary phasing of growth, as required by the Core Strategy, to ensure finding streams are in place to enable timely provision of infrastructure.

3.3.4 The Core Strategy highlights that the A271 to the north of the town has poor alignment, tight bends and a proliferation of access points into individual properties which create traffic safety and severance concerns. In addition, it identifies that congestion issues, created by additional development, at junctions between the town and the A22 including at the Boship roundabout, Ersham Road/South Road roundabout and Diplocks Way roundabout will need to be addressed. It also sets out the need to support improvement of linkages between the shopping core and other areas of the town, and improve accessibility to the town centre, particularly by public transport.

3.3.5 Given the impact that these developments are likely to have on the transport system the need for a comprehensive traffic/transport masterplan is recognised by ESCC, building on the strategic outcomes of the South Wealden and Eastbourne Transport Study (SWETS), to identify the necessary transport improvements required to accommodate the planned development in Hailsham and to manage the effective use of the currently secured contributions and those secured from further future developments. These identified (costed and designed) schemes will be included in future versions of the Infrastructure Delivery Plans arising from the Strategic Sites DPD together with agreed timescales for delivery.

3.3.6 As identified in paragraph 10.2 of the Planning Authorities’ response to the Inspector’s concerns, to enable the development of the transport masterplan for Hailsham, a more detailed town centre model is being commissioned by the County Council to:

a) illustrate existing and future traffic flows in and around the town;
b) assess the impact of development and mitigation schemes at a local level.
c) carry out an operational assessment of the possible town centre traffic management solutions (Scheme Options) and other improvements elsewhere in the town to model their effectiveness.
d) inform the spending and delivery of the £1.725 million already secured from existing permitted growth in Hailsham (see 3.3.2 & 3.3.3) and the additional contributions that will be secured from planned development.
3.3.7 This modelling work is being part funded by a number of the developers/landowners who represent those Strategic Development areas identified in Hailsham in the joint Core Strategy of the Planning Authorities. This, we would suggest, is a good example of close partnership working and a commitment to deliver.

3.3.8 The subsequent work elements and indicative timescales for the transport delivery/masterplan work which will be led by the County Council are:

<table>
<thead>
<tr>
<th>Work Element</th>
<th>Timetable</th>
</tr>
</thead>
<tbody>
<tr>
<td>• Commission updated transport model for Hailsham</td>
<td>Autumn 2011</td>
</tr>
<tr>
<td>• Scheme option development</td>
<td>Autumn 2011 / Winter 2012</td>
</tr>
<tr>
<td>• Identify potential schemes, initial design and indicative costs</td>
<td>Spring 2012</td>
</tr>
<tr>
<td>• Test schemes and impact through transport model</td>
<td>Spring/Summer 2012</td>
</tr>
<tr>
<td>• Develop scheme designs and more detailed costed options</td>
<td>Summer 2012</td>
</tr>
<tr>
<td>• Consultation on draft transport Masterplan</td>
<td>Autumn 2012</td>
</tr>
<tr>
<td>• Approve transport Masterplan</td>
<td>Autumn 2012</td>
</tr>
<tr>
<td>• Design, consultation and implementation of specific schemes</td>
<td>Early 2013 onwards</td>
</tr>
</tbody>
</table>

3.3.9 In conclusion, we consider that the HA’s stated concerns as to certainty of delivery and mechanisms for funding and delivery of the necessary transport interventions and improvements are unfounded.

3.4 Uckfield

3.4.1 In response to HA’s concern set out in their Regulation 27 response on the lack of detail of the transport measures needed to mitigate the impact of development in Uckfield, ESCC can confirm that Officers and Members of the four authorities - East Sussex County Council, Wealden District Council, Uckfield Town Council and East Sussex Fire and Rescue - have formed a Steering Group to work closely together in order to address the need for Uckfield town centre improvements. This Group ensures that any highway improvement scheme promoted will meet the broad objectives of the agreed town masterplan and the needs of the local residents and businesses.

3.4.2 The Steering Group recognised that in order to assess properly the congestion and traffic movements in the town, an up to date traffic model was necessary. This comprises the first element of an action plan, approved by the County Council’s Lead Cabinet Member for Economy, Transport and Environment in July 2011, to develop traffic management solutions for Uckfield town centre. Extensive traffic surveys were undertaken in November 2010 in order to produce a SATURN transport model. The
model study area covers the whole of the town and includes the existing Uckfield bypass. The model is a comprehensive tool representing existing peak hour traffic conditions. It also provides forecast traffic flows to test different transport interventions taking into account the likely proposed development allocations brought forward through the LDF Core Strategy up to 2027.

3.4.3 A detailed report summarising the SATURN model and the associated transport planning work undertaken to date was published in summer 2011. This provides the background to explain the extent of and reasons for traffic congestion in the town centre and how these might be addressed.

3.4.4 The report highlights that without interventions, traffic levels in Uckfield town centre will become unmanageable as a result of developments permitted on the basis of the Wealden Non-Statutory Local Plan. This has led to congestion centred round the Bell Lane/High Street traffic signal controlled junction. Improvements to the signals have previously been implemented, but there is limited scope to make further significant improvements without additional land being available. Without intervention and implementation of Town Centre Traffic Management Improvements as identified in the Infrastructure Delivery Plan, traffic congestion will continue to grow as the developments that are currently being constructed become occupied. As highlighted in paragraph 10.1 of the Planning Authorities response to the Inspector’s concerns, developer contributions of over £4m have been secured from existing permissions in Uckfield and its surrounds towards the delivery of a town centre traffic management option for Uckfield. The HA has been made aware of these studies and of the County Council’s agreed action plan for Uckfield at a meeting with the District Council in July of this year. The HA has now formally acknowledged and welcomed this work in its latest letter, received in September, to the District Council.

3.4.5 The SATURN model will be used to test and evaluate the potential effects of a range of transport interventions including the effects of any potential measures on the potential reinstatement of the Lewes to Uckfield railway line. These interventions range from Demand Management to providing new highway infrastructure. Demand Management could take the form of a travel planning approach to limit the number of vehicle trips through the junction by provision of improved public transport or improvements in the way car parking is provided and managed in the town. New highway infrastructure could take the form of a new road to the north or south of Bell Lane. Any proposal is likely to be supported by a package of measures to improve facilities for all road users which would benefit residents, businesses, shoppers and other interested parties.

3.4.6 The timetable for delivering the remaining elements of the action plan which is being led by East Sussex County Council on behalf of the four authorities, is:

<table>
<thead>
<tr>
<th>Work Element</th>
<th>Timetable</th>
</tr>
</thead>
<tbody>
<tr>
<td>Option Development - Different options will be worked up to a feasibility level and tested using the model</td>
<td>Autumn 2011</td>
</tr>
<tr>
<td>Consultation and Exhibition - Events showing the range of proposals. The public and other specific interested groups will be given the opportunity to influence and comment on the ultimate scheme through extensive consultation.</td>
<td>Winter 2011/ Spring 2012</td>
</tr>
<tr>
<td>Identify potential schemes and initial design</td>
<td>Spring 2012</td>
</tr>
</tbody>
</table>
### Work Element | Timetable
---|---
- Preferred Option - Depending on the outcome of these public events, a preferred option will be brought back for approval to the Town Centre Steering Group and the County Council's Lead Member for Economy, Transport and Environment | Summer/Autumn 2012
- Scheme Approval/Delivery - Following approval, the scheme will be taken forward through the necessary statutory processes so that implementation can take place once funding is in place. | Beyond 2013

3.5 **Crowborough**

3.5.1 The assessment of the effect of transport movements generated by the allocation of around 300 houses in Crowborough (along with the housing allocation of 1000 houses in Uckfield) over the plan period has identified that providing this overall quantum of growth is not exceeded this will not have an adverse impact on the overall levels of nitrogen deposition in Ashdown Forest. It is understood that growth above this threshold cannot meet that assurance necessary under the habitats regulations and so cannot be promoted within the core strategy.

3.5.2 Development of the quantum proposed in the town can from a highways perspective, be achieved albeit further work is required to determine the deliverability and consequential transport mitigation measures of any final proposed Site Development Allocations in Crowborough as part of the development of the Strategic Sites DPD. Early discussions have been held between ESCC and the developers acting for land at the District Council's preferred Strategic Development Areas - SDA9 (Jarvis Brook) and SDA10 (south east of Crowborough).

3.6 **Transport - conclusions**

3.6.1 With regard to the comments submitted by the HA, the County Council considers that it has shown that there is reasonable certainty of delivery of the necessary transport improvements and interventions identified in the Infrastructure Delivery Plan (IDP) accompanying the Core Strategy.

3.6.2 In particular, the range of works identified in SWETS and the ongoing work with developers and the County Council in the south of the District, coupled with the monies already collected (including those collected on behalf of the HA) for improvements to trunk road schemes and in and around Polegate/Hailsham, confirm that there is both a willingness to deliver, and a deliverable mechanism and timeframe.

3.6.3 Whilst in its original response to the draft SE Plan, the HA indicated clearly that it could not support any growth over and above that proposed in the RS, SWETS has provided more local and up to date evidence to support the level shown in the Core Strategy. However it is important to stress that when additional growth was eventually proposed for the south of the district this was, in part, on the basis of a belief that delivery of A27 improvements near Polegate (Folkington Link) might still be a realistic prospect.
3.6.4 Whilst SWETS has clearly identified this as the probable optimum improvement needed for the trunk road network, the latest Highways Agency response has clearly indicated that they have no such funding to deliver now any prospect of a scheme coming forward. Notwithstanding this confirmation, we have worked closely with the District Council (and Eastbourne Borough Council) and with the development industry to ensure a clear plan for delivery at the local level of what is both appropriate and needed.

3.6.5 We further consider that the work which we have detailed in respect of identifying and funding a range of transport measures to support existing and proposed growth in Uckfield meets the concerns expressed.

4 Education

4.1 As set out in the IDP the County Council expects that the level and distribution of housing development proposed by the Planning Authorities’ Core Strategy will, over the LDF period, give rise to requirements for significant investment in providing additional primary school and secondary school capacity in the following areas.

4.2 Hailsham

4.2.1 A shortfall of primary school places is predicted in the area of up to 2 forms of entry (420 places) from around 2013/14 onwards. Since the Core Strategy indicates most new housing will be provided in the north of the town, the County Council has identified a requirement for land and buildings for a new 2 form entry primary school in that area.

4.2.2 At secondary level, it is possible that a 1 form of entry shortfall (200 places – including post 16s) could arise in the town later in the decade. While Hailsham Community College (HCC) provides most of the town’s secondary school requirements, its campus has no space available for additional capacity. However, in relation to the new housing recently permitted to the east of Battle Road, Hailsham, the developer has agreed, though a Section 106 planning obligation with the District Council, to enter into an option agreement for the transfer of a site for the development of a new secondary school facility. If a stand-alone facility for post 16 students is established on the site to the east of Battle Road, sufficient space would be released on HCC’s existing campus to accommodate the likely increase in students aged 11-16.

4.3 Uckfield

4.3.1 As a result of new housing development, demand for places is forecast to rise over time to the extent that from the beginning of the next decade, the County Council is forecasting a requirement for an additional 1 form of entry (210 primary school places) in the town. Since the Core Strategy indicates most new housing will be provided in the southwest quadrant of the town, the County Council considers the additional capacity could be achieved through the provision of land and buildings for a new school in that area.

4.3.2 The County Council is also predicting a 1 form of entry shortfall in secondary school capacity (200 places – including post 16s) will arise during the LDF period. Enlargement of the Uckfield Community Technical College (UCTC) would be problematic as its existing campus fully developed. The County Council will,
therefore, explore the potential for increasing UCTC’s capacity by providing an ‘off-site’ facility in the town, for which land and buildings would be required.

4.4 **Polegate/Willingdon/Stone Cross**

4.4.1 The County Council estimates that the significant amount of housing development planned by the Core Strategy for the Polegate, Willingdon, and Stone Cross areas is likely to lead to a shortfall of up to 2 forms of entry primary schools (420 places) over the LDF period, with the impact starting to be felt from as early as 2013/14. The necessary capacity could be provided either through the enlargement of existing schools in the area or by providing a new primary school, for which land and buildings would be required.

4.4.2 The County Council is predicting a shortfall of up to 1 form of entry secondary places (150 places) from 2018/19, which could be addressed through enlargement of the existing Willingdon Community School.

4.5 **Buxted/Maresfield**

4.5.1 The County Council is predicting a requirement for up to an additional 0.5 form of entry (105 places) at primary level over the coming years. Pressure is already starting to be felt in the area, with one school admitting over its Published Admission Number in September 2011. The additional places could be delivered through enlargement of the existing primary schools in the area.

4.6 **Frant**

4.6.1 The County Council new housing in the local area is likely to give rise to needs for additional places at Frant CE Primary School later in the LDF period. While it may be necessary to add an additional 5 places per year group (35 places) to meet demand, and the recently completed school building was designed in such a way that an additional classroom could be added in the future if required.

5. **Conclusion**

5.1 In summary, having worked with the Planning Authorities on testing the various levels and distribution of growth, the County Council believes the Wealden Core Strategy to be sound and prepared in the context of a robust evidence base.

5.2 While the County Council recognises that further detailed work is required on the infrastructure required to support the level and broad distribution of development proposed the Core Strategy, in particular on transport and education, there is no evidence that these infrastructure requirements will not be delivered in the life of the Core Strategy.

5.3 As a key provider of transport and education services, the County Council’s service departments are planning to develop implementation plans for the various parts of the Core Strategy area to help to assist with guiding and programming the delivery of infrastructure required to support the levels of growth proposed. The formative phase of work on those implementation plans will be triggered by the Planning Authorities’ regulation 25 consultations on the Strategic Sites SPD.
5.4 This statement sets out the extent and timescales of this work, which is currently being led and commissioned by the County Council, in partnership with other stakeholders to the Core Strategy. The outcomes of this work will inform the subsequent development stages of the Local Development Framework, in particular the Strategic Sites DPD and the continual updating of the Infrastructure Delivery Plan (IDP). The County Council will continue to work closely with the Planning Authorities on the implementation and delivery of their Strategy.

5.5 The formation of the CIL Working Group and development of an action plan to support the preparation of CIL Charging Schedules provides assurance that there is a reasonable prospect of a CIL charging regime being promoted and adopted by the Planning Authorities in parallel with the Strategic Sites DPD. Viability assessments of levels of contributions will be tested to meet the identified funding gaps between the cost of infrastructure and the totality of other funding streams including infrastructure providers own funding resources’ such as the County Council’s capital programme and existing s106 contributions. Currently, we have no evidence that these infrastructure requirements will not be delivered in the life of the Core Strategy.