

2 pg. Fairlight's Pond Field housing de-allocation discussion leaflet

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Working with the highly experienced Local Planning Consultant with whom we won the called-in, five day Public Inquiry in Warwickshire, before moving to Fairlight, I have drafted a detailed five page discussion paper for councillors and below is a summary for Fairlight area residents, setting out the simple argument of why it is in Rother's, Fairlight's, Pett Level's and the environment's interest to **de-allocate housing on Wakeham's Pond Field (its historic name).**

Summary of objective:

Rother District Council (RDC) need to adopt a robust New Local Plan in 2023 with housing numbers that are deliverable, which is defined by the government's NPPF, as within five years.

The Government Planning Inspector in his Aug 2022 rejection of the developer's Wakeham Farm (Pond Field) Appeal, mentioned concerns around Highway safety, effects on living conditions, too many houses and AONB landscape harm, while the Appeal fell on the central issue of Fairlight's considerable sewage/flooding/drainage problems, on which this leaflet focuses.

Keeping Pond Field allocated will under-deliver housing Nos, making RDC vulnerable to unplanned opportunistic applications that get permitted simply on the basis of insufficient planned housing Nos.

Flooding and sewage pollution :

Sewage pollution, has become a national scandal, regularly featured in the media. A Palace of Westminster debate in Oct 2022, was led by the MP for Bexhill and Battle. Southern water (SW) is among the worst performing sewage polluters in the country and has been heavily fined by Ofwat.

The environmental damage in Fairlight and downstream, has been scientifically measured by Dr Simon Young through his research on invertebrates, which is in agreement with Govt EA surveys.

Rother DC's planning executives role:

The democratic, unanimous decision of Rother's elected planning committee rejected the Pond Field development. Nevertheless, Rother planning execs shockingly withdrew their key '*Sewage/flooding Objection*' to the Appeal Hearing for inaccurate reasons.

The Inspector's role:

This withdrawal failed though because the Inspector was professional in his approach and was the first person in 20 years to properly listen to residents, Maggie Sullivan and her independent Civil Engineer advisor. They explained SW's historic lack of correct, timely and regular maintenance and remedy of Fairlight's flooding and sewage pollution, and why this is not an easy problem to solve.

As important to the Inspector, in my view, was the impressive number of some 90 residents who made the effort to drive 30 minutes to the Hearing in Bexhill.

The Inspector's findings (see paragraphs 47 and 49 particularly) makes clear that Fairlight's sewage pollution and flooding problems have to be solved before houses are built on Pond Field.

Southern Water's role:

The previous works under SW's K3 Plan (2002), now requires greater ongoing maintenance and mitigating resolutions, and has caused further pollution and additional costs to residents.

SW's Executive Review Team in an email to Fairlight residents in 2021; suggested that any resolution to the sewage flooding and surcharging in Fairlight, is neither near a conclusion nor currently even in the list of priorities against the needs of other assets across SW's business.

Nevertheless, pressure from residents, reporting of pollution to EA and directly following the Inspector's Pond Field decision, SW made a belated acknowledgement of the importance of Fairlight's drainage problems, finally adding Fairlight into the '*Southern Water Pathfinder Project*' which defines SW's priority areas in combatting sewage pollution and they hope reducing their risk of further Ofwat/EA fines.

However, the journey SW speak of within the Pathfinder Report is predominantly a desk-top, fact-finding project and a proposal of '*possible*' resolution works that SW admit may not go ahead.

SW call their 'key aim' is to: "*Significantly reduce the use of storm overflows by 2030.*"

Simply put, to reduce the majority of sewage overflows that occur from the four Fairlight CSOs, according to the small amount of data SW have made publicly available, would require undertaking the significant upgrading of the Fairlight Wastewater Treatment Works, unlikely before 2050.

The Pathfinder executive summary states: "*This report is only the start of the journey towards a sustainable drainage system in Fairlight.*" (My emphasis).

SW's Pathfinder Report cannot therefore be relied upon by RDC to achieve anything whatsoever, let alone deliver a budgeted scheme with evidence of housing completions happening within 5 years.

Groundwater survey:

Fairlight has always been awash with groundwater assets and its geology makes it a flood area. Following SW asking for help from residents, these assets have now been objectively evidenced by the recent ongoing survey, painstakingly researched and mapped by Maggie Sullivan and other family members. This has been provided to SW and is Appendix D of the Pathfinder Report.

Conclusion: Pond Field de-allocation:

It's not possible therefore, that RDC planning executives could obtain any reassurance from the groundwater survey, Dr Young's/EA research nor the SW Pathfinder Report, in respect to the deliverability of the housing allocation on Pond Field within the necessary NPPF five-years.

There are many reasons why housing on Pond Field is the wrong place. RDC now need to come out of denial, listen to the Inspector, acknowledge the reality and accept that no extra housing on Pond Field should be permitted until, at the very least, there is a definitive solution to Fairlight's sewage pollution and flooding issues; and that once completed, has also been tried and tested over an extensive period.

In the same way that SW have an extremely challenging hydrological solution to devise, along with a moral and environmental obligation to remedy the current complex and long-term sewage flooding and pollution issues within Fairlight and downstream, Rother DC also have a '*duty of care*' to ensure the plans within their housing directive do not further impact the significant, persistent and historical issues of sewage, surface and groundwater flooding that currently already blights the area.

Without question, the Pond Field Housing allocation needs to be removed and not be in the New Local Plan. We need all our local and regional councillors to actively persuade the Rother DC executives of this requirement that is in Rother's and the Environment's best interest.