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Lynette Benton,
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Dear Lynette

WEALDEN DISTRICT (INCORPORATING PART OF THE SOUTH DOWNS NATIONAL PARK) CORE STRATEGY
AN ASSESSMENT OF THE CORE STRATEGY IN RELATION TO THE NPPF

I refer to your letter of 4th April in connection with the relationship between the Core Strategy and the NPPF, and there are a number of elements of the NPPF against which it is considered relevant to compare the Core Strategy in order to determine the extent to which the Strategy is compliant with current national planning policy. In summary I consider that there are a number of areas in which the Core Strategy is affected by the NPPF to a degree that it would be appropriate to reopen the examination to consider the implications, and I would like to formally request that.

It is relevant to note here, although not to consider in detail, that the NPPF does make a number of fundamental changes to overall policy direction and policy detail that require any presently adopted plan, or any plan currently in process but prior to being adopted, to be considered in specific detail relating to the NPPF. This letter refers in particular to: the presumption in favour of sustainable development; the Duty to Cooperate; the appropriate development plan policy regime and the weight to be attached to it; the fundamental requirement for a plan to be positive; and, in the circumstances in which the plan was examined in terms of housing requirements, the replacement of the housing supply criteria of PPS3 with those of the NPPF.

This document considers these principle elements of the NPPF and their relationship to the Core Strategy as presently drafted, with comments on the resulting position of the Strategy. The conclusions are: -

a) that the Core Strategy cannot proceed to adoption in its present form;

b) that the presently proposed Major Modifications are insufficient to rectify that situation;

c) that substantial further amendment would be required in order to produce a plan that was appropriate and acceptable in relation to the NPPF;

d) that there would of necessity have to be a further period of consultation on those amendments; and

e) that at the very least the Examination into the plan must be reopened to allow proper consideration and debate of the new situation.

SUSTAINABLE DEVELOPMENT

1. The presumption in favour of sustainable development is the key to the NPPF. The first sentence of the foreword says that "*the purpose of planning is to help achieve sustainable development"* and the seventh paragraph says "*sustainable development is about positive growth – making economic, environmental and social progress for this and future generations.*" The ninth paragraph confirms that "*planning must not simply be about scrutiny. Planning must be a creative exercise in finding ways to enhance and improve the places in which we live our lives."*

2. There are three dimensions to sustainable development – economic, social and environmental. Paragraph 8 confirms that these "*should not be undertaken in isolation, because they are mutually dependent."* Importantly, *"economic growth can secure higher social and environmental standards…Therefore, to achieve sustainable development, economic, social and environmental gains should be sought jointly and simultaneously through the planning system."*

3. We make no apology for setting out those comments in detail, because they go to the heart of the plan making process and firmly direct the way in which policy making should in future be carried out. The emphasis is clearly one of positivity – of using the planning system to create a better future. These circumstances give rise to a situation where it should not be for the planning approach set out in the development plan to merely adopt a precautionary approach, but to look for the means of moving positively to seek to meet acknowledged need. The result in practical terms, in specific relation to the Wealden Core Strategy, is that it fails in to a significantly unacceptable extent to meet the test of achieving sustainable development. In short, the Core

Strategy is unsound in its present form (including the proposed Major Modifications, about which we have made other representations).

4. There is a wider context against which the NPPF is set, and specifically in relation to the natural environment the second bullet point of paragraph 9 notes a link with a 2011 report *'The Natural Choice: Securing the value of Nature'* produced by Defra. This report deals specifically with the need to address the way in which environmental concerns should be dealt with in a wide context.

5. For instance, Paragraph 3 states*:* -

   "The Government wants this to be the first generation to leave the natural environment of England in a better state than it inherited. To achieve so much means taking action across sectors rather than treating environmental concerns in isolation. We will mainstream the value of nature across our society by: creating a green economy, in which economic growth and the health of our natural resources sustain each other, and markets, business and Government better reflect the value of nature; strengthening the connections between people and nature to the benefit of both;

   Through reforms of the planning system, we will take a strategic approach to planning for nature within and across local areas. This approach will guide development to the best locations, encourage greener design and enable development to enhance natural networks.

   Economic growth and the natural environment are mutually compatible."

   The Natural Choice: Securing the value of Nature reflects many of the concerns and aims of the report *"Making Space for Nature: A review of England's Wildlife Sites and Ecological Network*, Chaired by Professor Sir John Lawton CBE FRS and Submitted to the Secretary of State, the Department for Environment, Food and Rural Affairs on 16 September 2010. For instance it has the following aspiration: -

   "….we need a step-change in our approach to wildlife conservation, from trying to hang on to what we have, to one of large-scale habitat restoration and recreation, under-pinned by the re-establishment of ecological processes and ecosystem services, for the benefits of both people and wildlife."

6. It is quite apparent from both documents that the mood is positive; that there is an overall need to consider the environment and the need for development in a balanced and positive way. The positive tone of the document is a thread that runs through to the NPPF and its own approach - the

presumption in favour of sustainable development that is the NPPF 'Golden Thread' running through plan making and decision taking.

7. The NPPF is not therefore a stand-alone document in seeking to establish a balanced approach to sustainable development. Its relationship to the 2011 Defra report and associated documents concerning the need for a more positive approach is significant. It is clear that the intention is to balance the approach to development. Paragraph 9 of the NPPF confirms this approach in asserting that "Pursuing sustainable development involves seeking positive improvements in the quality of the built, natural and historic environment".

8. In considering the Core Strategy, and in assessing its fundamental relationship with conservation and ecological matters in relation to the base on which the NPPF was prepared, it is apparent that the approach adopted by the council not only fails to reflect the positivity of the NPPF but also fails to have proper regard to these much wider ecological issues. The Core Strategy takes the stance of seeking to prevent development beyond a certain level until there can be satisfaction that sufficient information has been received. The plan making process has thus been undertaken on a partial basis only. There has been no attempt to consider the positive manner in which the development needs of the District might be met in the way envisaged by the NPPF and the documents that support it.

9. In turn that means that the Core Strategy fails in the fundamental requirement to achieve sustainable development by failing to provide a proper and appropriate balance between economic, social and environmental matters. At this stage it is very unclear as to whether the CS approach can ever meet the requirements of sustainable development in the NPPF; the necessary balanced consideration of the key elements does not occur in the document.

10. This is a circle that cannot be squared by the Core Strategy in the form in which it has been submitted and for that reason it is unsound in relation to the NPPF in that its approach is wholly wrong in comparison with what is now national planning policy.

11. The reliance of the Core Strategy on policy NRM5 of the RSS as a justification for a stance that seek to significantly limit development below RSS levels, (and in terms of the requirement of the NPPF, significantly lower that identified local need). However, the situation has been moved forward by the NPPF to one where it should be the task of the Core Strategy to look for positive ways to meet need without compromising protected landscapes and habitats. That demands an approach that marries development and environmental provision and requires the Core Strategy to have in place a strong and balanced approach that meets housing need and promotes the creation

of new natural habitats. The introduction of amendments in WCS13 simply does not address that situation and the Core Strategy is incomplete in relation to the requirements of the NPPF.

DUTY TO COOPERATE

12. Section 110 of the Localism Act (insofar as it inserted a new section 33A into the Planning and Compulsory Purchase Act 2004) contains a Duty to Cooperate. Section (1)(a) requires a local planning authority to cooperate in in maximising the effectiveness with which specified activities are undertaken and (by virtue of subsection 2(a)) to *"engage constructively, actively and on an ongoing basis in any process by means of which activities within subsection (3) are undertaken".* Subsection 3 includes the preparation of development plan documents. There is a clear duty on the council to prepare its development plan in association with adjoining LPA's.

13. This need is drawn out in greater detail in the NPPF, and is specifically relevant in the case of the Wealden Core Strategy insofar as the need to consider a joint approach to the Ashdown Forest SPA and SAC is concerned. Paragraphs 178 and 179 of the NPPF state: -

    a. "178. *Public bodies have a duty to cooperate on planning issues that cross administrative boundaries, particularly those which relate to the strategic priorities set out in paragraph 156. The Government expects joint working on areas of common interest to be diligently undertaken for the mutual benefit of neighbouring authorities.*

    b. *179. Local planning authorities should work collaboratively with other bodies to ensure that strategic priorities across local boundaries are properly coordinated and clearly reflected in individual Local Plans. Joint working should enable local planning authorities to work together to meet development requirements which cannot wholly be met within their own areas – for instance, because of a lack of physical capacity or because to do so would cause significant harm to the principles and policies of this Framework. As part of this process, they should consider producing joint planning policies on strategic matters and informal strategies such as joint infrastructure and investment plans."*

14. It was readily apparent at the Examination of the Core Strategy that the LPA had not fulfilled the basic duty set out in general terms in the Localism Act. The requirement of the NPPF is more specific and there is great emphasis on the need for cooperation. The council's reasons for failing to undertake appropriate dialogue with adjoining authorities included the fact that its own inability to provide sufficient housing meant that it was not in a position to consider the potential that such

cooperation would result in additional housing requirements as a failure of adjoining local authorities to bring sufficient land forward. Specifically, there was disagreement with Tunbridge Wells Borough Council as to the position in respect of a proposed strategic development site at Frant. Perhaps more importantly, however, there as a failure to consider an overall approach to Ashdown Forest with Mid Sussex District Council.

15. The fundamental backbone of the Wealden position for development in the north of the District, based upon a 7km zone of influence for development around the Ashdown Forest SAC, is the same situation faced by Mid Sussex, and it is not appropriate to deal with that situation on a piecemeal basis. A significant failure to assess the impact of the Core Strategy proposals on a proper comprehensive basis in accordance with the Duty to Cooperate has led to a situation where the Core Strategy development options cannot be brought forward at all because there is no mechanism in the document to allow that. Further, a failure to cooperate with the adjoining local authority in a consistent approach to Ashdown Forest SAC will potentially result in an inconsistent and fragmented approach that will not secure the protection required.

16. The Major Modification to WCS 12 deals with the matter only in broad simplistic terms and it is quite apparent from the present position that that modification will not be sufficient to secure soundness because it does not include a specific policy. Only by including a positive approach to the balance between environmental and other elements of sustainable development can the Core Strategy be compliant with the NPPF. Wealden District Council's position, which has clarified since the closure of the Examination, is that there can now be no new development at all in the zone of influence until it has formulated a policy approach to deal with the Ashdown Forest question. That is as graphic an indication of the failure of the Core Strategy to take a balanced approach as there could be.

17. The demonstrable failure of the Core Strategy to meet need (or to provide for any development at all for the foreseeable future) is so clearly at odds with the aim of the NPPF to achieve sustainable development in the terms expressed in paragraph 7 that it cannot be sound, and major modification is required to bring the Core Strategy in line with the NPPF.

18. Specifically, without a framework that will ensure that "sufficient land of the right type is available in the right places and at the right time to support growth and innovation" the Core Strategy will not meet the economic role of sustainable development. By failing to provide "the supply of housing required to meet the needs of present and future generations" it will fail to meet the social role. While it will meet the environmental role by preventing any meaningful level of development and thus arguably protecting the natural environment, paragraph 8 of the NPPF requires all three roles

to be met simultaneously. By failing to do so the Core Strategy does not meet the requirement of the NPPF to "play an active role in in guiding development to sustainable solutions."

THE POLICY TEST – NPPF v DEVELOPMENT PLAN

19. The manner in which the Core Strategy should be examined in relation to the NPPF is set out at paragraph 182 of the NPPF. In essence, therefore, the extent to which the Core Strategy is sound now depends not upon the tests that were relevant at the time of the Examination but upon those in that paragraph. Where there is a difference it should be highlighted and the nature of the council's position explained. The primary tests are whether the plan has been prepared in accordance with the Duty to Cooperate, legal and procedural requirements, and whether it is sound. A "sound" plan is: -

- **Positively prepared – the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development.** In response to this the Wealden Core Strategy fails. The plan does not seek to meet objectively assessed development; it specifically seeks to make provision for significantly less development than it acknowledges is required. There has been no discussion with adjoining authorities regarding the potential for allocation of housing on a wider basis that might allow some of the Wealden need to be located elsewhere or for Wealden to accept housing development in lieu of provision elsewhere. The CS therefore completely fails the Duty to Cooperate test and the need for positive preparation.

- **Justified – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence.** The Core Strategy fails because there is no effective assessment of potential alternative strategies. In the opposite, the council has undertaken no meaningful research into the potential to accommodate additional levels of development or the positive steps that might be undertaken to accommodate it. Contrary to the NPPF the council has in fact taken an entirely negative approach to development.

- **Effective – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities.** There has been no attempt at effective cross-boundary working. On present evidence there are significant parts of the Strategy that are not deliverable at all because the council has failed to properly address the manner in

which land will be brought forward, and in that respect the Strategy may, in substantial areas of the District, be entirely ineffective.

- **Consistent with national policy – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework.** The last point regarding effectiveness is equally relevant here. The Strategy will not ensure the timely delivery of sufficient housing to meet acknowledged need. It is not promulgated to any meaningful degree on the basis that it will deliver sustainable development in the manner envisaged in the NPPF. That is, in a balanced way that seeks to equally meet a range of identified criteria dealing with economic, social and environmental objectives. The Core Strategy as drafted fails to deal effectively with the necessary social and economic needs of the District because of significant over-emphasis on environmental factors. Instead of seeking to prevent development as a 'precautionary' reaction against environmental factors that are in any case only based on questionable data the council should be seeking positive and imaginative solutions to meet the need to build a strong, responsive and competitive economy and a supply of housing sufficient to meet existing and future generations. The Strategy needs to be based on a fundamentally different approach as a result of the NPPF and it is difficult to see how it could be amended simply through modification.

20. The importance of a clear and properly related approach are set out in paragraph 17 of the NPPF, which requires local plans to provide a practical framework within which decisions on planning applications can be made with a high degree of predictability and efficiency. The manner in which the Core Strategy is drafted is fundamentally flawed in this regard. The nature of the position in which the council presently finds itself, as a result of the failure to provide the required positive approach or to take any proper account of the requirements of the NPPF towards a balanced and positive approach to development, has left it in a situation where development in the northern part of the District has floundered, and where the council finds itself unable to approve even a single new dwelling. That cannot be right, and it serves starkly to demonstrate the inadequacy of the Core Strategy not only to deliver timely development but more importantly to meet the requirements of the NPPF in any meaningful way at all.

21. The Core Strategy reflects a perceived need to protect important landscape and conservation interests clearly above all other considerations. Its approach to that has been entirely on the basis of support offered by policy NRM5 of the South East Plan. It is important therefore to analyse that policy in relation to the NPPF, to seek to attribute appropriate weight to it and to compare that to the NPPF approach. The policy is part of the development plan but it is to be revoked in the near future.

POLICY WEIGHT

22. The basis of the necessary test is contained in paragraph 214 of the NPPF, which confirms that full weight can continue to be given to NRM5 "*even if there is a limited degree of conflict with this Framework."* It is thus appropriate to consider whether the 'brake' on development provided by NRM5 in the present case carries greater weight than the positive approach to sustainable development in the NPPF.

23. Paragraph 212 of the NPPF requires that it be taken into account in the preparation of plans. Paragraph 216 requires an examination of the degree of consistency of the relevant policies in the emerging plan to the policies in the NPPF. The closer the policies in the emerging plan to the policies in the Framework, the greater the weight that may be given.

24. The test, therefore, is the manner in which the policy approach of the Wealden Core Strategy is consistent with the NPPF. That is, whether policy NRM5 should continue to closely direct the Core Strategy or whether the very different approach of the NPPF should prevail.

25. The view that is taken here is that since policy NRM5 essentially contains an approach that conflicts with the NPPF it should carry less weight. The NPPF, being the latest and most up to date element of policy, should carry most weight in any case. A comparison of the approaches is set out below.

POLICY REQUIREMENT

26. The starting point of the NPPF in plan making (paragraph 14) requires local authorities to 'positively seek opportunities to meet the development needs of their area' and to 'meet objectively assessed needs'. There are two caveats to that, including whether any adverse impacts of doing so would 'significantly and demonstrably' outweigh the benefits.

27. The fundamental approach of the Core Strategy has been defined to be to meet lower housing requirements than specified by the RSS, and it has been clearly confirmed by the inspector that on that basis the Core Strategy is clearly unsound in relation to the RSS.

28. The approach of the Core Strategy has been justified by the need to take policy NRM5 of the RSS as the one fundamental test of the level of housing that can be achieved. It authorises LPAs to reduce housing numbers where there is potential conflict with the need to take account of protected landscapes and habitats.

29. Uncertainty over the effect of development on the Ashdown Forest SPA (largely as a result of a failure by the council to prepare or commission appropriate evidence gathering and a consequent inability to produce a level of certainty that it states is required) has resulted in a position where the allocation of housing in the northern part of Wealden District has been curtailed to an extent that has been acknowledged by the council to be well below the market need for housing in that area. The extent to which it is necessary to meet that need in accordance with the NPPF must be measured against the level of recognition to be given to policy NRM5 of the RSS.

30. There is a further matter of importance, however, in relation to the nature of the attention that must be paid to identified need. PPS3, now revoked, but instrumental in producing the approach adopted in the Core Strategy, required that the level of housing provision take into account evidence of need and demand for housing. Paragraph 47 of the NPPF, however, requires the NPPF to meet the full, objectively assessed needs for market and affordable housing. [our emphasis].

31. Thus, the weight of the policy approach to housing has shifted to an extent that there must be a difference at this stage in the balance between NRM5 and the required policy approach. In effect, the strength of NRM5 is reduced by virtue of the significantly greater need against which it must be balanced, and the significantly greater positivity of the approach of the NPPF to development. The Core Strategy housing requirements have not been assessed against this new and more rigorous test and the Strategy cannot be adopted unless and until such test has been properly conducted.

MEETING THE POLICY – A POSITIVE APPROACH

32. In the present context it is abundantly clear that the council's approach to the Core Strategy as a matter of overall principle does not 'positively seek opportunities' and has not sought to meet 'objectively assessed needs'. Instead the Strategy has been prepared on the basis of the precautionary principle instead of proactively seeking solutions to identified potential difficulties to the supply of residential and economic development. The plan is unsound for that reason. In addition the plan is clearly based on inadequate supply. It has already been found unsound on that basis in relation to a less rigorous policy approach, and is certainly unsound in relation to the greater requirements of the NPPF.

THE WAY FORWARD

33. The overall approach of the Core Strategy fails by virtue of a lack of a suitable approach to the potential difficulties it identifies. If it is accepted that there is a potential adverse effect from development on Ashdown Forest then it is for the development plan to seek positive ways of

mitigating that in accordance with the NPPF. There are two principal issues – SANGS and nitrogen deposition.

SANGS

34. The Core Strategy acknowledges the potential problem but then falls silent on what should be an integral and fundamental part of the planning approach – a strategy that seeks not only to mitigate harm that would potentially be caused by seeking to meet housing need in accordance with the NPPF but also seeks to improve the relationship between existing settlements and Ashdown Forest. That requires the integration of new development and SANGS, selecting development locations that not only provide additional open space but also improve the relationship of settlements with the countryside that surrounds them and creates new strategic areas for recreation and enjoyment of the countryside that meet the fundamental principles of SANGS to be Suitable Alternative Areas of Natural Green Space.

NITROGEN DEPOSITION

35. The position now being taken by the LPA in respect of nitrogen deposition and its effect on the SAC has been aligned with that relating to the need for mitigation. Again, the approach adopted by the council is one of significant entrenchment, to the extent that no development that creates additional vehicle movements is considered possible in the SAC 7km zone of influence. The Core Strategy has no mechanism for dealing with this problem and in addition now fundamentally fails to meet the requirement of the NPPF to plan positively to meet identified need.

36. A positive approach to this situation requires consideration of strategic development locations where it can be demonstrated that the likely traffic generation and settlement pattern relate in such a way that it can be anticipated that the effect on the SPA and SAC will be minimised. If such development locations can also incorporate SANGS provision then it would be possible to demonstrate that in combination those measures outweighed any adverse effects.

37. That approach would be supported by paragraph 152 of the NPPF: -

> *"152. Local planning authorities should seek opportunities to achieve each of the economic, social and environmental dimensions of sustainable development, and net gains across all three. Significant adverse impacts on any of these dimensions should be avoided and, wherever possible, alternative options which reduce or eliminate such impacts should be pursued. Where adverse impacts are unavoidable, measures to mitigate the impact should be*

considered. Where adequate mitigation measures are not possible, compensatory measures may be appropriate."

38. That the Core Strategy fundamentally fails to address this situation has been demonstrated by the council's present position, where it considers itself unable to grant planning permission for any new dwellings at all in the 7km zone of influence that has been drawn around the Forest. In effect, the council has confirmed that the Core Strategy is incomplete and that the allocations of land it seeks to make are incapable of implementation because a basic element of the plan is missing. There has been no positive attempt at considering alternative options, the Core Strategy includes no adequate mitigation measures and fails to determine whether compensation measure are required.

39. The Core Strategy has already been confirmed to be unsound in its approach to housing requirements and the fundamental failure to secure an appropriate approach to the balance of need and protection heightens the extent of unsoundness to an extent that means that the Core Strategy cannot be justified in its approach solely on the basis of a policy in the RSS that already carries less weight than the NPPF but which is also shortly to be revoked.

40. The manner in which the Core Strategy should proceed, therefore, is by quantifying the housing need present in the District in accordance with paragraph 47 of the NPPF. Unless the Core Strategy "….meets the full, objectively assessed needs for market and affordable housing in the housing market area, as far as is consistent with the policies set out in this framework" it will remain unsound in that it will fail to provide for identified housing need.

41. It is acknowledged that it is necessary to assess the extent to which such an approach is consistent with the remainder of the NPPF, and in particular to establish whether a 'NRM5' approach can be justified to allow a similar substantial reduction in housing provision (but from locally measured need rather than from regional target figures).

42. Accordingly, one needs to consider whether the Core Strategy can be brought into line by modification. We are aware of the 'model policy' that has been placed on the Planning Portal that effectively sets out the overall basis on which future local plans should be prepared. For the sake of completeness only that policy is set out here.

    a. *"When considering development proposals the Council will take a positive approach that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework. It will always work proactively with applicants jointly to find solutions which mean that proposals can be approved wherever*

possible, and to secure development that improves the economic, social and environmental conditions in the area.

b. *Planning applications that accord with the policies in this Local Plan (and, where relevant, with polices in neighbourhood plans) will be approved without delay, unless material considerations indicate otherwise.*

c. *Where there are no policies relevant to the application or relevant policies are out of date at the time of making the decision then the Council will grant permission unless material considerations indicate otherwise – taking into account whether:*

Any adverse impacts of granting permission would significantly and demonstrably outweigh the benefits, when assessed against the policies in the National Planning Policy Framework taken as a whole; or

Specific policies in that Framework indicate that development should be restricted."

43. As to whether the insertion of such a policy into the Core Strategy would make it sound by becoming the basis of decision making when set against the policies of the CS, that clearly cannot be the case. Where the whole CS is promulgated on the basis of restriction of development rather than looking for opportunities to promote it, and where therefore its approach is fundamentally different from that required by the NPPF, a single policy will have no effect. The only way in which the matter can be resolved is by significant reconsideration of the Strategy and a further Examination to consider its basic policy approach.

44. There are three possible outcomes: -

a) No change to the Core strategy housing provision

b) Increase in the Core Strategy housing provision to the level required by the RSS as a minimum. Include adequate phasing in the Strategy to meet the requirements for the full period of the plan. Allocate housing locations specifically selected to take account of constraints that have been properly quantified and where locations have been specifically selected to meet economic, social and environmental criteria. Include a primary strategy for the creation of suitably located natural green space.

c) Withdraw the Core Strategy and formulate a revised document to provide the level of housing required by the NPPF, and in the accordance with the need to achieve sustainable development. In the north of the District that means positively planning improvements to the relationship between development locations and existing and new areas of nature conservation. In the south of the District that requires providing certainty to infrastructure

providers as to future goals and ensuring that there is a realistic opportunity to meet those goals through proper integration of infrastructure and development. That would result in a balanced Core Strategy that met its required purpose and ensured that there was a creative approach as required by the NPPF and the background documents that it cites.

I hope that these comments are relevant to the matters the inspector wishes to address, and I look forward to the next stages of the Core Strategy process. I will be making further comments in respect of the Major Modifications in due course.

Yours sincerely

Andy Stevens
DipTP MRTPI MRICS