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For the attention of Lynette Benton

18 May 2012

Dear Ms Benton,

IMPLICATIONS OF THE NATIONAL PLANNING POLICY FRAMEWORK ON THE CORE STRATEGY EXAMINATION

Thank you for providing the Highways Agency (HA) with the opportunity to make representations on the implications of the National Planning Policy Framework (NPPF) on Wealden's Core Strategy.

As you will be aware, we made representations as part of the Examination against the soundness of the Core Strategy due to the lack of evidence relating to the deliverability of critical infrastructure improvements to the:

- A27 Cophall roundabout;
- A27 / A22 Dittons Road roundabout; and
- A27 / A2270 signal controlled junction

Work is currently ongoing between East Sussex, Wealden District and the HA to progress and resolve the outstanding issues.

With respect to the NPPF, we would like to take this opportunity to outline how the policy affects the Core Strategy from the point of view of the Strategic Road Network (SRN) which we have the responsibility to manage on behalf of the Secretary of State. Please find our comments below.

<u>Sustainable Development</u>

The NPPF focuses strongly on promoting sustainable development which it defines through the use of economic, social and environmental criteria. The economic aspect of sustainability is designed to produce a strong competitive economy by ensuring that, amongst other things, the proposed LDF development is coordinated with the provision of necessary infrastructure (Paragraph 7).

In relation to the Core Strategy, this policy is of particular significance as development within the district is reliant on the delivery of SRN infrastructure improvements without which the targets for growth set out in the Core Strategy cannot be met. Our written statements therefore, focussed on understanding how the identified junction improvements will be funded, phased in relation to development trigger points and designed to meet DMRB standards in order to demonstrate that the improvements can be delivered.

This approach is consistent with the NPPF from a sustainable development aspect but also infrastructure and deliverability which are discussed in Paragraphs 162 and 173 respectively and further emphasises the need for development to be linked to infrastructure improvements.

Planning System

The NPPF states that development proposals that accord with the Local Plan should be approved without delay. With respect to the highway provisions and SRN improvements outlined in the Core Strategy, it is important that the HA is able to agree measures with Wealden District / East Sussex as the NPPF restricts the ability to oppose proposals once within the Core Strategy.

It should be noted however that the ongoing work associated with the SRN improvements is likely to result in certain aspects of the Core Strategy / Infrastructure Delivery Plan (IDP) being superseded and this will necessitate the need for updates to be incorporated in to the Core Strategy / IDP at a later date.

Sustainable Transport

The sustainable transport section of the NPPF is supportive of the HA's role as the operator of the SRN. It advocates a hierarchical approach in terms of:

- Directing development to sustainable locations;
- Minimising travel demand;
- Managing the residual impact; and
- Capacity enhancement as a last resort.

This approach accords with our own and has been used within the review of the Core Strategy.

I hope that the above is helpful in outlining where the NPPF is relevant to the SRN in terms of Wealden's Core Strategy. It should be noted that we do not think that it is necessary for the views to be heard in front of the Inspector as they do not differ significantly from our previous position.

Yours sincerely

Glen Thompson
Business Manager