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Ms Lynette Benton
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Our ref: E116/C1/NPPF/Let01
16th May 2012

Dear Lynette

Wealden District Core Strategy National Planning Policy Framework

Thank you for your letter of the 4th April requesting representations on the National Planning Policy Framework (NPPF).

These representations have been prepared on behalf of the Trustees of the KKH Banner Life Interest Settlement which own land immediately to the north and east of the built up area of Stone Cross. This land has been identified as part of urban extensions SD6 and SD7 to Stone Cross in the Core Strategy and so can provide housing to meet the needs of the District. We attach a plan showing the land outlined in red.

The NPPF is clear that the delivery of housing to meet objectively assessed needs is a priority. The Core Planning Principles (paragraph 17 bullet point 3) state that "every effort should be made objectively to identify then meet the housing, business and other development needs of an area." Plans should "set out a clear strategy for allocating sufficient land which is suitable for development in their area."

Paragraph 47 states that "to boost significantly the supply of housing, local planning authorities should use their evidence base to ensure that their Local Plan meets the full objectively assessed needs for market and affordable housing in the housing market area."

The Core Strategy seeks to deliver 400 homes per annum which is below the 550 per annum required by the South East Plan (or regional spatial strategy). Our client's interests lie in the Stone Cross Area. As was apparent at the Core Strategy Hearing into Matter 8, the Polegate, Willingdon and Stone Cross Area Strategy, there is more land available than the Council propose to allocate. Much of this land is developable, deliverable and is

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sustainably located. The constraint to bringing forward more development is the ability to treat waste water in the area. To meet the policy requirements of the NPPF the Core Strategy should meet the objectively assessed housing needs. The South East Plan puts these housing needs much higher than Wealden District who have stated that their ability to deliver homes is constrained by environmental factors and that their demographic analysis does not support the South East Plan housing requirements.

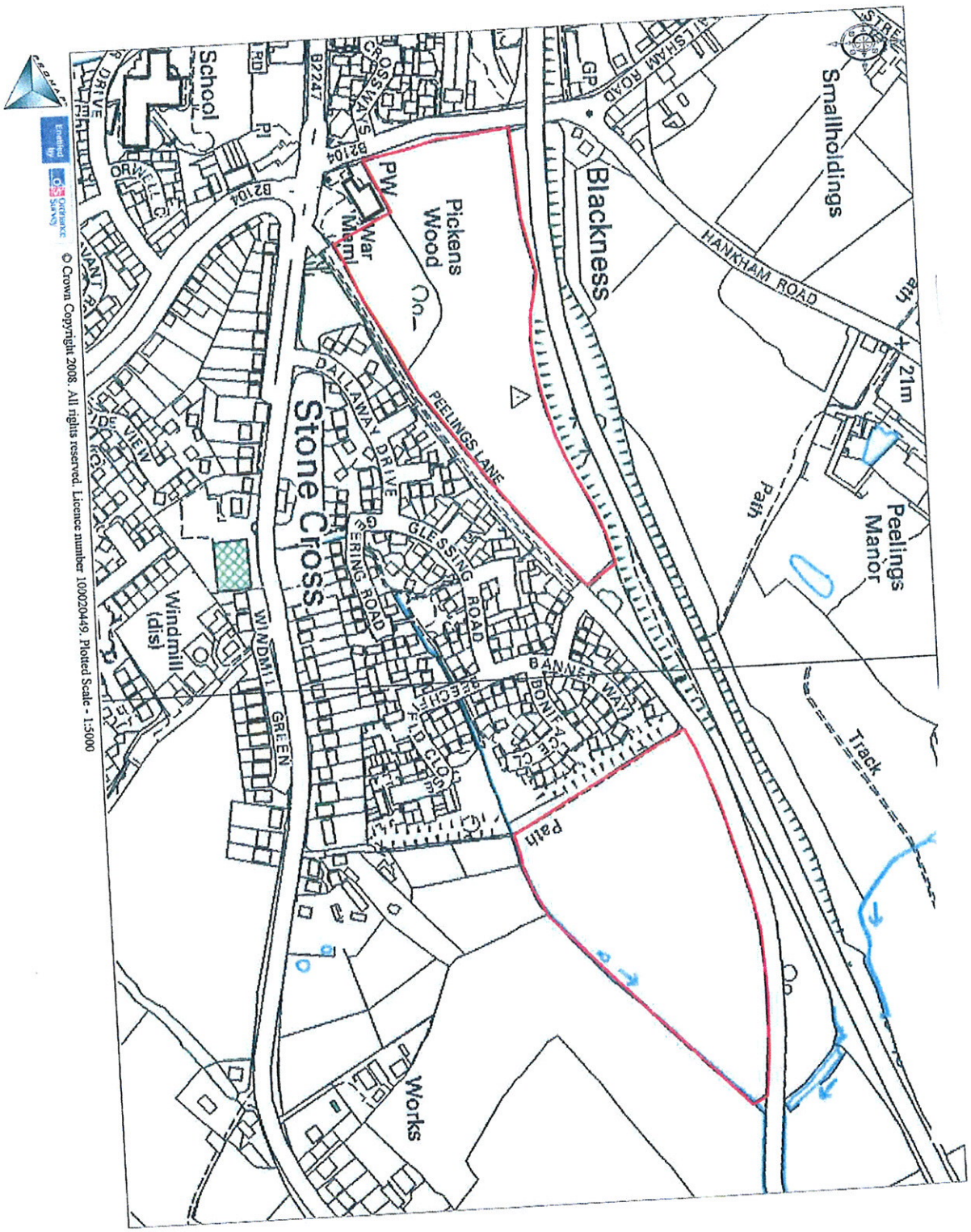
The Core Strategy should contain the flexibility to deliver more homes in the Polegate, Willingdon and Stone Cross area as soon as more waste water capacity can be made available. In this respect we support the Inspector's proposed modifications to include a review of the Core Strategy by 2015, at the latest, so that increased waste water treatment capacity predicted by 2020 can be used to increase housing delivery in south Wealden.

The NPPF in paragraph 32 states that "development should only be prevented or refused on transport grounds where the residual cumulative impacts of development are severe."The Core Strategy indicates in paragraph 6.32 that a risk to delivery of the Polegate, Willingdon and Stone Cross area strategy is highways infrastructure. In our Matter 8 statement we suggested that simple improvements to the B2247/B2104 Hailsham Road Junction could mitigate the impact of development on our client's land to the north and provide benefits to other road users. In view of the NPPF and the findings of our client's assessment, paragraph 6.32 should be changed to be point 8 of paragraph 6.31 stating: "highways infrastructure in the south Wealden area will be improved as required to mitigate the impacts of development."

These comments are made as written representations and we do not wish to be involved in any hearing on the NPPF.

Yours sincerely

DAVID BARKER MRICS MRTPI
PARTNER


Smallholdings
Blackness
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21m
Peelings Manor
Path
Track
Pickens Wood
War Meml
PW
PEELINGS LANE
DALLAWAY DRIVE
Stone Cross
GLEESING ROAD
GERING ROAD
BANNER WAY
BONIFACE CLOSE
WINDMILL GREEN
Windmill (dis)
School
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