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Lynette Benton
Programme Officer
Wealden District Council
Pine Grove
Crowborough
East Sussex
TN6 1DH

16 May 2012

Our ref: 231701

Dear Ms Benton,

Consultation on implications of the National Planning Policy Framework for the Core Strategy Development Plan Document

We write on behalf of our client Marchfield Management Services LLP (Fairfield Partnership) in response to the above consultation. We will write separately in response to the Council's consultation on the proposed modifications to the Core Strategy.

As set out within our previous representations on the Core Strategy our client controls land to the north of Hailsham (SHLAA site reference 243/1310), which is located within the proposed North Hailsham Strategy Development Area (SDA). The site has capacity to provide a significant proportion of the 700 new dwellings identified for this SDA.

Paragraph 14 of the National Planning Policy Framework (NPPF) highlights that:

- at its heart is a *'presumption in favour of sustainable development'*
- *'local planning authorities should positively seek opportunities to meet the development needs of their area'* and
- development proposals that accord with the development plan should be approved without delay.

Paragraph 153 of the NPPF states that '*Each local planning authority should produce a Local Plan for its area'* and that '*Any additional development plan documents should only be used where clearly justified.'*

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Paragraph 156 refers to local planning authorities setting out strategic priorities for the area in the Local Plan, with paragraph 157 making reference to Local Plans indicating *'broad locations for strategic development on a key diagram and land-use designations on a proposals map.'*

The Council's Local Development Scheme (LDS) and the Core Strategy refer to a Strategic Sites Development Plan Document (DPD). An issues and options consultation on this DPD was carried out earlier this year. The LDS states that this document will establish the exact location of development within the SDAs through the identification of strategic sites and that each site will be presented on the proposals map and supported by specific policies applicable to that site.

Whilst the Core Strategy was prepared prior to the NPPF, we do not consider it necessary to set detailed boundaries for the strategic allocations through an additional tier of planning policy, in the form of the Strategic Sites DPD. The exact location of development within each SDA can be better addressed through the planning application process, which will realistically address landownership and delivery issues as well as identifying sufficient deliverable land necessary to mitigate any environmental and/or infrastructural impacts of the strategic development. Development control policies will be incorporated within the Delivery and Site Allocations DPD, also included as part of the Council's LDS, and these can be used to set criteria for development. The Strategic Sites DPD is unnecessary, and will cause additional delay. It is therefore in conflict with the principles of the NPPF. The delay it will cause is evidenced by a recent request for a pre-application meeting to discuss a proposed planning application for our client's site being denied by the Council on the grounds that a meeting at this time would be premature pending further progress on the DPD. This should be brought to the attention of the Inspector in the context of this issue.

In light of the above, reference to the Strategic Sites DPD within the Core Strategy is considered to render it **unsound** on the basis of being contrary to national policy. This can however be easily rectified through the deletion of all references to the Strategic Sites DPD from the Core Strategy prior to its adoption.

The NPPF gives further support to the proposed modifications removing references to phasing; phasing imposed as a matter of policy rather than in response to technical issues causes an unnecessary constraint to sustainable development which conflicts with the NPPF.

We trust that the above comments will be given full consideration prior to the adoption of the Core Strategy.

Yours sincerely,

Nick Guildford
Associate Director
cc Marchfield Management Services LLP