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

Our Ref: 11-053JW

14th May 2012

Dear Ms Benton

Re: Wealden District Council & The South Downs National Park Authority Core Strategy Examination.

Inspector's Invitation to comment on issues and implications arising from the publication of the National Planning Policy Framework (NPPF).

We represent Mr H Reilly, in respect of land adjoining the eastern side of Heathfield. Our interest remains principally in the Heathfield Area Strategy and Core Strategy (CS) policy SD11.

The introduction of the NPPF has made a number of relevant policy direction changes which now need to be considered following the Inspector's invitation to consider its relevance to the CS. Your letter dated 4th April 2012 refers.

Paragraph 47 of the NPPF explains how the housing land supply should be provided and states that additional buffers of between 5% and 20% housing must be brought forward from latter plan years depending on the evidence of housing delivery. As a consequence the housing trajectory on page 30 of the Core Strategy needs to be revised to take on board the 'front loading' of housing. In our original written evidence on matter 3F, we explained that Wealden District Council have historically under provided in terms of its annual housing delivery. On that basis, the Core Strategy should be updated to emphasise that 20% front loading of housing should occur. The increase in housing delivery in the early years should happen as a matter of some urgency and the ability of the Heathfield area to deliver housing should be reconsidered to help facilitate this process.

NPPF Section 6 (paragraphs 47-53) requires a wide choice of deliverable high quality homes to be provided. The site adjoining the eastern side of Heathfield (which we have promoted through the CS process) meets the criteria in paragraph 47 (footnote 11) as it is available now and provides a realistic prospect of housing

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delivery within 5 years on a site that is viable and where sustainable development can be provided. This location assumes all the more relevance given the identified constraints applying to the development of sites in proximity of the Pevensey Levels and within 7 km of the Ashdown Forest.

The reintroduction of a strategic allocation for Heathfield on this land would allow the requirements of paragraph 50 of the NPPF to be fulfilled in all respects, including the provision of a wide choice of high quality homes, the creation of sustainable, inclusive and mixed communities and affordable homes. Excluding new housing growth for Heathfield in the CS would deny this specific town the opportunity to bring forward new, sustainable growth which would not meet the aims of the NPPF. In this context, paragraph 52 may be a key part of the NPPF where it advocates that the supply of new homes can sometimes be best achieved through the planning for larger scale development, such as the extension of existing villages that follow the principles of Garden Cities as a way of achieving sustainable development. The reintroduction of a strategic allocation for Heathfield on the land we have promoted can meet the objectives and guidance in this part of the NPPF given its overall lack of constraint and the freedom of opportunity to bring about sustainable development that adheres to the principles set out in the new Guidance.

As it stands, the CS makes no provision for Heathfield as a town or community which would seem to be contrary to the direction taken in Section 8 of the NPPF. The allocation of the land we have promoted would provide the means by which improved community facilities including open space for sport and recreation, can be provided as an integrated development package that achieves the level and standard of provision expected in the NPPF. The proposals put forward in our 'concept proposal' also provides an opportunity to enhance public access and rights of way and to create the sort of green spaces that the NPPF sees as being created and retained for community benefit in the long term.

It would logically follow that given the heightened level of constraint that has been identified for sites within 7 km of the Ashdown Forest and that affect the Pevensey Levels, an urgent re-focus is required on Heathfield as a strategic provider of housing and growth. It is acknowledged that the NPPF affords high levels of protection to the AONB, but it does not rule out development in these areas altogether, the objective is to ensure that appropriate sustainable growth is accommodated in a way that meets that criteria in the NPPF (paragraph 115).

Yours sincerely

Jon Williams MRTPI (Partner)
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cc. Mr H Reilly