DM/
Mr Marlow

18 May 2012

Lynette Benton
Programme Officer
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CROWBOROUGH
East Sussex TN6 1DH

Implications of the NPPF on the Wealden Core Strategy.

Dear Mrs. Benton,

I would be grateful if you would forward the following comments in relation to the impact of the NPPF on the Wealden Core Strategy.

The principlal point I would look to make is that the NPPF moves somewhat from the position in PPS3 in that it enables the opportunity to have regard to windfall sites in the first ten years of the plan period.

Therefore, the Inspector may reasonably have regard to the contribution that windfall sites may make towards any housing target.

It is clear from the draft Core Strategy (paragraph 5.9) that the District Council does believe that windfall sites will make a contribution to supply, but at the time of writing, felt unable to make allowance for them. Indeed, it would appear that the wording of Policy SP03 which proposed at least 9,600 homes, together with Policies WCS1 and WCS2, which refer only to the identification/allocation of land to meet the requirement, acknowledge such a contribution.

It is evident from the background paper entitled 'Managing the delivery of housing' and specifically Appendix 9 that windfall sites have made and may reasonably be expected to continue to make a significant contribution to housing supply. This would appear to be the case even discounting the contribution of windfall sites on garden land (which the NPPF does not allow for) based on the information in Appendix 10 for the years 2008-2010.

It is my view that both the Council and the Inspector may legitimately give an indication in the final Core Strategy that there is this reasonable prospect of windfall development, based on substantive evidence, that may be taken into account and will mean that the actual scale of development will be much closer to the South East Plan target than is currently suggested.

I anticipate making a similar representation in respect of the proposed modifications.

David Marlow
Planning Strategy and Environment Manager