Friday 18th May 2012
493/A3/JJA

Lynette Benton
Programme Officer
Wealden District Council
Pine Grove
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By Email only

Dear Sirs

Re: Wealden District Council's Core Strategy – The Implications of the NPPF Representations of Judith Ashton Associates on behalf of Wates Developments Limited

I write with reference to the above and set out below our views on the implications of the recent changes in national planning policy on Wealden District Council's (WDC's) Core Strategy (CS).

Para 47 of the NPPF look's to '*boost significantly the supply of housing*' and as a result indicates that LPA's should:-
'identify and update annually a supply of specific deliverable sites sufficient to provide five years worth of housing against their housing requirements with an additional buffer of 5% (moved forward from later in the plan period) to ensure choice and competition in the market for land. Where there has been a record of persistent under delivery of housing, local planning authorities should increase the buffer to 20% (moved forward from later in the plan period) to provide a realistic prospect of achieving the planned supply and to ensure choice and competition in the market for land'

Having regard to the above and our previous submissions on the housing needs of the area as set out in the SHMA/ HNA, and WDC's history of undersupply – as evidenced by the AMR, we believe WDC are an authority who should be looking to identify and update annually a supply of specific deliverable sites sufficient to provide five years worth of housing against their housing requirements with an additional buffer of 20% (moved forward from later in the plan period) to ensure choice and competition in the market for land. We do not believe the background papers to the CS demonstrate this is achievable and as such believe the CS is **inconsistent with national policy** – i.e. it does not meet the tests of Para 182 of the NPPF. The CS needs to be amended, with the housing delivery targets in the first 5 years of the plan period increased and the phasing shown on figure 5 amended accordingly, without such an amendment the CS as drafted is in our opinion **unsound**.

In addition to the above, having regard to the advice in Para 159 of the NPPF (meeting household and population projections and catering for housing demand), and the evidence put before the CS inquiry, we believe further consideration should be given to the level of housing to be accommodated during the plan period, and the distribution of said housing. Whilst Para 154 of the NPPF requires plans to be realistic and to address the spatial implications of economic, social and environmental change, and Para 152 of the NPPF acknowledges that 'significant adverse impacts of any of these dimensions [economic, social and environmental] should be avoided, and wherever possible, alternative options which

reduce or eliminate such impacts should be pursued', the CS needs to demonstrate why the scale of growth proposed is realistic given the economic, social and environmental implications, and why these effects cannot be mitigated (in line with para 152 of the NPPF), if it is to be **consistent with national policy** as required by Para 182 of the NPPF.

Likewise the plan needs to explain how it has looked to address cross boundary issues. Given the fact the CS does not look to accommodate its housing requirement it needs to demonstrate that this has been discussed with neighbouring authorities and that all parties have reached an agreement as to how this unmet need is to be addressed/ why it can't be, especially given the fact neighbouring authorities such as Mid Sussex are looking to significantly reduce their housing land supply. Without any evidence of cross boundary cooperation (as required by paragraphs 178 – 181 of the NPPF), we do not believe the plan can be said to be **positively prepared** in accordance with Para 182 of the NPPF, and as such it is fundamentally **unsound**.

Given Wates interests in Wealden, and having been present, and participated in the debates on matters 3 (Housing) and 8 (Polegate, Willingdon and Stone Cross) we would ask, should the inspector deem it necessary to re open the hearings to debate the effects of the NPPF, that we are able to participate in said debate.

Yours sincerely.

JUDITH ASHTON
Judith Ashton Associates

C.c. Simon Knight Wates Developments Limited