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Lynette Benton
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My ref: WEV/001/RG

17th May 2012

Dear Lynette,

Re; Town and Country Planning Act 1990: National Planning Policy Framework (NPPF) and the Wealden District (Incorporating Part of the South Downs National Park) Core Strategy.

I refer to the above and to your letter of 4th April 2012. On behalf of the WE Vine Trust this Practice welcomes the opportunity to respond to the invitation to submit representations regarding the implications of the recently published NPPF. I would be grateful if you would kindly refer this letter to the Core Strategy Inspector.

In his letter of 5th March 2012 to the District Council's Mr. Phillips, the Inspector identified the fact that the District Council had not demonstrated a robust demographic basis which justified departing from the housing provision of the South East Plan (SEP). The scale and extent of the shortfall in housing provision was, furthermore, of such significance that the Inspector considered that the Core Strategy could not be regarded as in "general conformity" with the SEP.

Whilst the environmental constraints and waste water treatment works capacity issues identified offered a partial solution, albeit in the latter case a timing issue, the fact remains that the Core Strategy does not make sufficient housing provision, particularly in the absence of there being any evidence of co-operation with adjoining authorities in order to compensate for the level of under provision now confirmed by the Inspector.

The NPPF requires positive plan making. Paragraph 157 establishes the crucial role which Local Plans should have in planning positively for the development and infrastructure required in the area to meet the objectives, principles and policies of the NPPF.

Whilst a rapid review of the Core Strategy has been recommended by the Inspector the interim impact of the under provision of housing needs to be fully understood particularly within the context of the local housing market where there is already significant evidence of high demand and a growing need for affordable housing. Once the housing market improves and mortgage lending returns to more conventional levels there is no doubt that the result of stalled delivery and under provision will be an even greater detrimental effect unless action is taken to release unconstrained land within the wider area. This will mean engaging with adjoining local planning authorities. At this stage it is anticipated that such co-operation will not be forthcoming and unfortunately therefore places the focus back on Wealden District and, in particular, the Southern Water study regarding waste water treatment capacity in that part of the District which is within the Sussex Coast sub region.

As the lead times for development are often considerably longer than anticipated it seems therefore essential to plan for the growth now – whatever the waste water sewage treatment works solution

is going to be. The delays in the production of this study are unacceptable given the fact that Southern Water made the SEP Panel aware of its intentions in this regard some six years ago. The Panel did not regard such studies as any impediment to the delivery of housing within the period to 2026 as *" 17.36.....we heard that EA and Southern Water were doing further studies and are optimistic that a solution can be found and we assume that this is most likely to be a phasing issue."*

In order to *"plan positively"* therefore the capacity of the waste water treatment works, etc. currently constraining the provision of housing within the District needs to be tackled through a phasing policy and not a review mechanism. So far as the Trust is concerned no one has suggested that these difficulties were insurmountable and therefore the positive decision should be to plan ahead within a phasing strategy.

In conclusion, the NPPF seeks constructive, positive planning and not one of protracted delays and procrastination as will be the inevitable consequence of a review (no matter how soon). Given the severity of the housing shortfall and the absence of any evidence of compensatory collaborative measures to help overcome this critical problem, positive planning must mean a return to planning for the housing provision established within the SEP now without further delay.

The Inspector is respectfully suggested to recommend such a course of action in the light of the NPPF.

Yours sincerely,

Robert Gillespie
Managing Director.