Wealden District (Incorporating part of the South Downs National Park) Representation on the Proposed Modifications to the Core Strategy

Wealden District Council

Working in Partnership

South Downs National Park Authority

This response relates to the proposed modification	
MM 3 & MM33	**WS 5, 8, 10, 13, 35**
(Please add numeric reference e.g. MM22 or Wealden District Council/ South Downs National Park Authority modification WS e.g. WS 23)	

Declaration:	I consider the proposed modification will assist the submitted Core Strategy to be found sound ☐ /unsound ☒ (*place a cross in the box to show which option you have chosen) for the following reasons:

Reasons Given:	The proposed modifications to the Core Strategy made by both the Planning Inspector (reference MM) and by Wealden District Council, in their document dated April 2012 (reference WS) cumulatively have significant implications. The shortening of the plan period to 2027 requires strategic development sites to be built out more quickly than originally envisaged, including at West Uckfield (Policy SD1). The removal of commencement dates (in reference to West Uckfield - this is 2016) can be seen in the context of the Inspector's letter dated 5 March 2102, in which he stated "I consider that the SDAs could come forward and be developed more quickly than suggested by the housing trajectory." Nonetheless, in respect of land at West Uckfield, the District Council have acknowledged in their Submission Core Strategy that the delivery of this allocation is subject to a number of factors which may increase the risk of delivery (see paragraph 6.11(3)). It notes that development of this site will require significant preparation work for infrastructure delivery and, in order to allow the market to deliver on this large single site, housing would be built over the long term. It notes that if development has not commenced by 2016, a review of the Core Strategy in relation to Uckfield would be required. Suggested modifications by both the Planning Inspector and the District Council have now underlined a further significant risk to the timely delivery of development on this site, namely its proximity within 7kms of Ashdown Forest. The policy and text changes now require mitigation measures, including the provision of suitable alternative natural green space to be provided prior to the occupation of development (see reference MM33, WCS8 and WCS35). There is no evidence within the submission Core Strategy or the proposed modifications to indicate that there is either any clarity on the detail of the necessary mitigation measures to facilitate the residential delivery of SD1, or a clear timescale on when such mitigation may be in place. Furthermore, there is no evidence that the geographic extent of Policy SD1 will be adequate to deliver the requisite development envisaged with the appropriate mitigation measures. These concerns are particularly poignant in respect of Policy SD1, given the District Council's admission within their Strategic Sites DPD Issues and Options Consultation Paper that "In order to achieve the development of 1,000 dwellings on this site, in addition to the business floor space and any community facilities, it will be necessary to develop the remainder of the land outside of these particular constraints (for example, Areas of Ancient Woodland and areas at risk of flooding)" (paragraph 5.14). The proposed modifications to the Core Strategy therefore result in further delivery constraints and challenges beyond those that have already been identified on land at West Uckfield, and a lack of certainty that they can be delivered in a timely fashion to ensure an early commencement of development, as required by the proposed modifications.

The consequence of these proposed modifications is that there is a weakening of the prospect of the development allocated at west of Uckfield (Policy SD1) coming forward in a timely fashion and at a quantum that is envisaged. On this basis, the proposed modifications render the Core Strategy unsound.

As a result of this, the necessary consequential changes should be an acknowledgement within the Core Strategy that additional land beyond that covered in Policy SD1 may need to be identified in and around the fringes of the Uckfield settlement boundary, to ensure that there is the potential for other sites to come forward early in the plan period to contribute to the housing need for the town. These are likely to be less constrained in infrastructure and delivery terms than the large single site at Uckfield.

In particular, land at Ridgewood House would be suitable and appropriate for identification for housing delivery early in the plan period. This site has good connectivity to the strategic development area and is geographically well placed between that site and existing open space at the Millennium Green to the southeast and is also adjacent to a river corridor, enabling further mitigation and ecological enhancement of the land at West Uckfield. This site is of a sufficient size to enable the delivery of housing development in conjunction with suitable alternative natural green space on site, and for these to be delivered prior to the occupation of any development. Such a SANGS has the potential to link with existing open space at the Millennium Green and any SANGS on land at SD1.

If this is a new matter that you have raised please complete the following I wish ☒ / do not wish ☐ (*place a cross in the box to show which option you have chosen) for this matter to be heard in front of the Inspector	
Signed:	
Name and Address:	Mr E Sim & Mr G Harvie Smith c/o Mr D Mayhew DOWSETTMAYHEW Planning Partnership
E-Mail Address:	

If on behalf of a company, please state:	DOWSETTMAYHEW Planning Partnership Ltd
Date:	13 June 2012

Please place a cross in the box to show which option you have chosen	
I would wish to be notified of the publication of the recommendations of any person appointed to carry out an independent examination of the Core Strategy	Yes ☒ No ☐
I would wish to be notified of the adoption of the Core Strategy	Yes ☒ No ☐

Note: If completing this in hardcopy form, please use additional sheets if necessary.

Please return this form by **5pm on Wednesday 13th June 2012**:

By post to: Head of Planning and Environmental Policy, Wealden District Council, Freepost SEA 10959, Crowborough, East Sussex, TN6 1BR

By email to: ldf@wealden.gov.uk

Data Protection Act 1998 and Freedom of Information Act 2000
Representations cannot be treated in confidence. Regulation 30 of the Town and Country Planning (Local Development) (England) Regulations 2004, as amended, requires copies of all representations to be made publicly available. The Council will also provide names and associated representations on its website but will not publish personal information such as telephone numbers, e-mails or private addresses. By submitting a representation on the Proposed Modifications you confirm that you agree to this and accept responsibility for your comments.

Please telephone 01892 602007 or e-mail ldf@wealden.gov.uk if you require assistance in submitting your representation or if further information is required. If you, or somebody you know, would like the information (guidance notes, forms etc) in large print, braille, audio tape/CD or in another language please let us know.