# 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 | |
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| **MM 14** | **WS** |
| **(Please add numeric reference e.g. MM22 or Wealden District Council/ South Downs National Park Authority modification WS e.g. WS 23)** | |

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| **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: |

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| **Reasons Given:** | The proposed modification to policy WCS1 is not in our opinion clear and could as a result be ineffective. Furthermore it makes no reference to cross boundary issues which, given paragraphs 178-181 of the NPPF, should in our opinion be taken into account in these modifications<br>Rather than say:-<br>'The review shall include an assessment of current and future levels of need and demand for housing to provide an appropriate basis for longer term housing'<br>We would suggest the following alternative wording:-<br>'The review shall include an assessment of current and future housing requirements within the district, having regard to a detailed demographc analysis and cross boundary requirements. The housing requirement shall encompass affordable, intermediate and market needs and demands so as to provide an appropriate basis for longer term housing land supply |

**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

# 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** | **WS 4, 5 and 6** |
| **(Please add numeric reference e.g. MM22 or Wealden District Council/ South Downs National Park Authority modification WS e.g. WS 23)** | |

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| **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: |

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| **Reasons Given:** | The proposed mods were issued concurrently with the publication of the NPPF.<br>Para 47 of the NPPF look's to 'boost significantly the supply of housing' and as a result indicates that LPA's should:-<br>'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'<br>Having regard to the above 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.<br>We do not believe the background papers to the CS demonstrate this is achievable and as such believe the CS, even with the proposed mods 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.<br>In addition to the above we would suggest that given the proposed changes to the wording of policy WCS4, which now provides flexibility between the level of housing proposed in SD6 and SD7, it would be more effective to amalgamate SD6 and SD7, allowing for 650 dwellings to be accommodated on land to the north, east and south of Stone Cross. This change would enable the DC greater freedom, through the Strategic Sites DPD, to review the scale of growth proposed to the north, south and east of Stone Cross. Furthermore, as Westham Parish Council have recently agreed to look at progressing a Neighbourhood Plan for their Parish, and all of the sites put forward by WDC in the Strategic Sites DPD in Stone Cross fall within the parish of Westham, this would provide a more positive basis upon which local residents can determine where development is to be located, and as a result a more effective plan, that reflects the aims and aspiration of national government guidance and the Localism Act.<br>We therefore recommend that policy WCS4 is amended with the scale of growth proposed in SD6 and SD7 encompassed in one SDA that provides for 650 dwellings to be delivered on land to the north, east and south of Stone Cross<br>Thus we would suggest the following alternative wording to that part of WCS4 that refers to SD6 and SD7<br>'SD6: Land at North, East and South East of Stone Cross - provision of around 650 dwellings';<br>SD7 - deleted<br>Associated consequential changes to the CS would then flow from this amendment including Figure 8 and the Key Diagram |

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**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

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| **Signed:** | Judith Ashton |

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| **Name and Address:** | Judith Ashton Associates |

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|---|---|
| **E-Mail Address:** | |
| **If on behalf of a company, please state:** | Wates Developements Limited |
| **Date:** | 21st May 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 ☒<br>No ☐ |
| I would wish to be notified of the adoption of the Core Strategy | Yes ☒<br>No ☐ |

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

Please return this form by **5pm on Wednesday 23rd May 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**

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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.