WEALDEN LDF CORE STRATEGY

REPRESENTATIONS TO THE WEALDEN CORE STRATEGY PROPOSED MODIFICATIONS

Bell Cornwell
CHARTERED TOWN PLANNERS

Proposed Modifications / Charles Church Southern Ltd

This response relates to the proposed modification:		
MM		**WS2 (Proposal SP03)**
Declaration: I consider the proposed modification will assist the submitted Core Strategy to be found ~~sound~~ / unsound for the following reasons:		
Reasons Given:	**Reference to Plan period and average number of dwellings per annum should reflect that set out in the Inspector's Main Modifications MM1 and MM8**	
If this is a new matter that you have raised please complete the following:	I wish / ~~do not wish~~ for this matter to be heard in front of the inspector. N/A	
Signed:	J Terry	
Name and Address:	Bell Cornwell LLP	
Email Address:		
If on behalf of a company, please state:	Charles Church Southern Ltd	
Please put 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: X No:
I would wish to be notified of the adoption of the Core Strategy		Yes: X No:

WEALDEN LDF CORE STRATEGY

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Bell Cornwell
CHARTERED TOWN PLANNERS

Proposed Modifications / Charles Church Southern Ltd

This response relates to the proposed modification:	
MM	**WS4 (Policy WCS4)**
Declaration: I consider the proposed modification will assist the submitted Core Strategy to be found ~~sound~~ / unsound for the following reasons:	
Reasons Given:	**Continued support for the inclusion of SD12: Land adjacent to Tunbridge Wells in the Parish of Frant. However continued objection to limitation of the number of 120 dwellings here which could make a valuable contribution towards the under provision across the rest of the District.** **Please see original representation and our further representations in response to the Inspector's 'Matters, Issues and Questions' (Matter 11, question f)) which in summary are that the capacity of SD12 has been unduly restricted due to an out-of-date and unsubstantiated evidence base (bio-diversity audit). This is despite its location being acknowledged as particularly sustainable on the edge of Tunbridge Wells. The process of preparing the Core Strategy is therefore flawed and the resulting plan unsound.** **As a result WCS4 should be amended in respect of SD12 to accommodate between 220 – 250 dwellings.**
If this is a new matter that you have raised please complete the following:	I wish / ~~do not wish~~ for this matter to be heard in front of the inspector. N/A
Signed:	J Terry
Name and Address:	Bell Cornwell LLP
Email Address:	
If on behalf of a company, please	Charles Church Southern Ltd

state:	
Please put 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: X No:
I would wish to be notified of the adoption of the Core Strategy	Yes: X No:

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CHARTERED TOWN PLANNERS

Proposed Modifications / Charles Church Southern Ltd

This response relates to the proposed modification:		
MM		**WS5 (para 5.16);** **WS6 (Figure 5);** **WS7 (Figure 5)**
Declaration: I consider the proposed modification will assist the submitted Core Strategy to be found sound / ~~unsound~~ for the following reasons:		
Reasons Given:	**Support for the removal of reference to 'phasing' in preference for an 'indication of delivery linked to the delivery of infrastructure'.**	
If this is a new matter that you have raised please complete the following:	I wish / ~~do not wish~~ for this matter to be heard in front of the inspector. N/A	
Signed:	J Terry	
Name and Address:	Bell Cornwell LLP	
Email Address:		
If on behalf of a company, please state:	Charles Church Southern Ltd	
Please put 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: X No:
I would wish to be notified of the adoption of the Core Strategy		Yes: X No:

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Proposed Modifications / Charles Church Southern Ltd

This response relates to the proposed modification:	
MM	**WS8 (Figure 5);** **WS9 (Paragraph 5.16);** **WS10 (WCS5)**
Declaration: I consider the proposed modification will assist the submitted Core Strategy to be found ~~sound~~ / <u>unsound</u> for the following reasons:	
Reasons Given:	**WS8: Figure 5:** Reference to be added to the bottom of Figure 5 (Indication of Delivery of Housing) linking development at the Tunbridge Wells urban extension with capacity of the Waste Water Treatment Works (WWTW) in combination with development arising from the Tunbridge Wells LDF: **RESPONSE and Suggested Revision to Modification WS8 Figure 5:** As an indicative timeline there is no need for further reference to the particular reasons for anticipated delivery which, applied to all sites may be many and varied. It should go without saying that the development trajectory will be subject to the provision of infrastructure and that this is adequately dealt with through Policies WCS5 'Managing the Release of Housing land' and Policy WCS7 'Effective Provision of Infrastructure'. If any further modification to Figure 5 is deemed necessary it should comprise the following: - Reference should be made either within the title to or beneath Figure 5 to clarify that this is simply an <u>indicative</u> timeline; - Reference should be made to Policies WCS5 and 7 with regard to delivery in relation to the provision of infrastructure. All other detailed explanation is unnecessary. **Suggested Revision to Modification WS8:** ***"Figure 5: <u>Indicative</u> Phasing of Development."***

Amend proposed footnote to read:

"Development will be subject to the provisions of WCS5 and WCS7 in terms of infrastructure provision. ~~The following matters are of relevance to the delivery of housing:~~ …

Delete "~~Development at the Tunbridge Wells urban extension (within Frant parish) will be subject to there being enough capacity within the relevant Waste Water Treatment Works in combination with development arising from the Tunbridge Wells Local Development Framework.~~"

WS9: Paragraph 5.16: The addition of text at para 5.16 to refer to the removal of phasing but that a resolution to infrastructure capacity issues at Tunbridge Wells (in particular the WWTW) to be resolved prior to development taking place;

RESPONSE and Suggested Revision to Modification WS9 Revision to Paragraph 5.16

Suggested Revisions to Modification WS9:

"New para *5.17 (6th bullet point) Development on land within Frant Parish adjacent to the boundary with Tunbridge Wells (SD12) will require resolution of infrastructure capacity issues, ~~in particular waste water treatment capacity at Tunbridge Wells,~~ prior to development taking place".*

WS10: Policy WCS5: Reference to the managed release of land to be dependent on the provision of infrastructure.

Monitoring of the provision of infrastructure is <u>insufficient</u> to ensure the delivery of key infrastructure which will facilitate the release of land for housing. The local planning authority needs to be <u>proactive</u> in ensuring that appropriate infrastructure (such as the WWTW) is in place in a timely manner, particularly where this relates to cross boundary matters. In fact the Council has a DUTY to Cooperate in relation to the planning of sustainable development (Localism Act s110; NPPF paragraphs 178, 179 and 182), in this instance with the neighbouring

	Tunbridge Wells BC and statutory undertakers to ensure appropriate infrastructure is provided. Reference to this duty and measures that the Council propose to take in order to fulfil this duty should be made clear within paragraph 5.16 and WCS5. Without the fulfilment of this duty the Plan will remain unsound. **RESPONSE and Suggested Revision to Modification WS10: Policy WCS5:** **Add a further sentence to WS10 to detail what proactive action the Council will take to discharge its Duty to Cooperate in relation to the planning of sustainable development: In particular, in ensuring the cross boundary strategic priorities are properly coordinated in general and the resolution of capacity issues in particular.**
If this is a new matter that you have raised please complete the following:	I wish / ~~do not wish~~ for this matter to be heard in front of the inspector. N/A
Signed:	J Terry
Name and Address:	Bell Cornwell LLP
Email Address:	
If on behalf of a company, please state:	Charles Church Southern Ltd
Please put 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: X No:
I would wish to be notified of the adoption of the Core Strategy	Yes: X No:

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Proposed Modifications / Charles Church Southern Ltd

This response relates to the proposed modification:		
MM		**WS28 (Paragraph 7.4)**
Declaration: I consider the proposed modification will assist the submitted Core Strategy to be found ~~sound~~ / unsound for the following reasons:		
Reasons Given:	**Reference to the Council seeking a consistent and coordinated approach to meeting infrastructure deficiencies is welcomed as is reference to partnership working. However this is insufficient to give certainty to the supply of housing land which is dependent on the provision of critical infrastructure. The Council has a DUTY to Cooperate in relation to the planning of sustainable development (Localism Act s110; NPPF paragraphs 178, 179 and 182).** **Further clarification and reference should be made within the Infrastructure Delivery Plan as to what form this 'coordinated approach' and 'partnership working' will take to ensure the timely delivery of necessary infrastructure.**	
If this is a new matter that you have raised please complete the following:	I wish / ~~do not wish~~ for this matter to be heard in front of the inspector. N/A	
Signed:	J Terry	
Name and Address:	Bell Cornwell LLP	
Email Address:		
If on behalf of a company, please state:	Charles Church Southern Ltd	
Please put a cross in the box to show which option you have chosen		
I would wish to be notified of the publication of the		Yes: X

recommendations of any person appointed to carry out an independent examination of the Core Strategy	No:
I would wish to be notified of the adoption of the Core Strategy	Yes: X No:

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Proposed Modifications / Charles Church Southern Ltd

This response relates to the proposed modification:		
MM		**WS39 (Key Diagram)**
Declaration: I consider the proposed modification will assist the submitted Core Strategy to be found sound / ~~unsound~~ for the following reasons:		
Reasons Given:	**Urban Extension to Tunbridge Wells: Support for removal of the reference to 'commencement around 2026'**	
If this is a new matter that you have raised please complete the following:	I wish / ~~do not wish~~ for the matter to be heard in front of the inspector. N/A	
Signed:	J Terry	
Name and Address:	Bell Cornwell LLP	
Email Address:		
If on behalf of a company, please state:	Charles Church Southern Ltd	
Please put 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: X No:
I would wish to be notified of the adoption of the Core Strategy		Yes: X No:

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Proposed Modifications / Charles Church Southern Ltd

This response relates to the proposed modification:		
MM1 (Summary); **MM8 (SP03)**		**WS**
Declaration: I consider the proposed modification will assist the submitted Core Strategy to be found sound / ~~unsound~~ for the following reasons:		
Reasons Given:	**Support for the bringing forward of the Plan period from 2030 to 2027 and the increased annual delivery rate from 400 to 450;** **Support for the removal of phasing.**	
If this is a new matter that you have raised please complete the following:	I wish / ~~do not wish~~ for this matter to be heard in front of the inspector. N/A	
Signed:	J Terry	
Name and Address:	Bell Cornwell LLP	
Email Address:		
If on behalf of a company, please state:	Charles Church Southern Ltd	
Please put 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: X No:
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Proposed Modifications / Charles Church Southern Ltd

This response relates to the proposed modification:		
MM4 (Paragraph 3.10)		**WS**
Declaration: I consider the proposed modification will assist the submitted Core Strategy to be found sound / ~~unsound~~ for the following reasons:		
Reasons Given:	**Support for the confirmation that there is no demographic basis to support lower housing provision than that set out in the South East Plan.**	
If this is a new matter that you have raised please complete the following:	I wish / ~~do not wish~~ for this matter to be heard in front of the inspector. N/A	
Signed:	J Terry	
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Email Address:		
If on behalf of a company, please state:	Charles Church Southern Ltd	
Please put a cross in the box to show which option you have chosen		
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Proposed Modifications / Charles Church Southern Ltd

This response relates to the proposed modification:		
MM17 (WCS2)		**WS**
Declaration: I consider the proposed modification will assist the submitted Core Strategy to be found ~~sound~~ / unsound for the following reasons:		
Reasons Given:	**Object in so far as the table seeks to restrict the number of new dwellings adjacent to the Tunbridge Wells boundary to 120: See original representations submitted. In the same way that MM17 seeks to delete the number of dwellings at Heathfield and Waldron row, the figure '120' should be deleted and a similar insertion added against Tunbridge Wells extension to read *'To be determined in a subsequent DPD'*.** **Reason: because the restriction made is artificial and the SDA could contribute to under delivery elsewhere in the District.**	
If this is a new matter that you have raised please complete the following:	I wish / ~~do not wish~~ for this matter to be heard in front of the inspector. N/A	
Signed:	J Terry	
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If on behalf of a company, please state:	Charles Church Southern Ltd	
Please put 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: X No:

WEALDEN LDF CORE STRATEGY REPRESENTATIONS TO THE WEALDEN CORE STRATEGY PROPOSED MODIFICATIONS	Proposed Modifications / Charles Church Southern Ltd

I would wish to be notified of the adoption of the Core Strategy	Yes: X No:

This response relates to the proposed modification:		
MM		**WS**
Declaration: I consider the proposed modification will assist the submitted Core Strategy to be found sound / unsound for the following reasons:		
Reasons Given:		
If this is a new matter that you have raised please complete the following:	I wish / ~~do not wish~~ for this matter to be heard in front of the inspector. N/A	
Signed:	J Terry	
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Please put 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: X No:
I would wish to be notified of the adoption of the Core Strategy		Yes: X

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Bell Cornwell
CHARTERED TOWN PLANNERS

Proposed Modifications / Charles Church Southern Ltd

	No: