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13 June 2012

Delivered by Email and Post

Wealden District Council
Planning Services
Pine Grove
Crowborough
East Sussex TN6 1DH

Our ref: HALL2002
Your ref:

Dear Sirs

PROPOSED MODIFICATIONS TO THE CORE STRATEGY
REPRESENTATIONS ON BEHALF OF HALLAM LAND MANAGEMENT

We write on behalf of Hallam Land Management in response to the Proposed Modifications to the Core Strategy that were published for consultation on 11 April (following the Examination in Public, at which we appeared).

We welcome the opportunity to comment on the proposed modifications and are pleased to see that some of points raised at the Public Examination have been taken on board by the Inspector.

We have already made separate representations by letter dated 12 May 2012 to the Core Strategy in light of the adoption of the National Planning Policy Framework, and would request that our latest representations to the Proposed Modifications should be read in conjunction with this earlier submission.

In summary, we would like to raise three main points:

1) We welcome the proposed removal of phasing, however to provide further flexibility in terms of housing delivery, the strategic sites SD2 and SD3 (Land East of Hailsham and Land North of Hailsham) should be merged and considered holistically;
2) We welcome the requirement to review the strategy in 2015 in order to address environmental factors that are restricting the adequate supply of development land in the longer term (MM14).
3) We welcome the shortening of the Plan period to 2027 (MM1) and the increase in housing delivery requirements to 450 dwellings per annum, however in recognition that it has not been demonstrated that there is a demographic basis to support lower housing provision than in the South East Plan (MM4), we believe that the increase in housing delivery could go further.

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Delivery of Housing in Hailsham

We support the suggested modifications to remove phasing (Page 30, 31, 32, 42, 46, 49, and Key Diagram) as agreed during the course of the Core Strategy Examination. The NPPF requires Councils to adopt a positive approach to delivering housing that reflects the presumption in favour of sustainable development. Phasing is not justified by infrastructure constraints and therefore presents an unnecessary hurdle to delivery and reduces the flexibility and responsiveness of the plan in reacting to changing circumstances.

For consistency and clarity, we suggest that the Land East of Hailsham and Land North of Hailsham (SD2 and SD3) should be combined as a single SDA within the housing trajectory in Figure 5. It was agreed at the examination that there was no justification for phasing land to the East ahead of land to the North and this further modification would avoid any subsequent confusion and ensure that immediately deliverable sites to the North can come forward to address housing supply issues and provide a new primary school, which is required in the short term.

An Early Review of the Core Strategy

In view of the recognition that it has not been demonstrated that there is a demographic basis to support lower housing provision than in the South East Plan (MM4), we welcome the addition within the supporting text to Policy WCS1 (MM14) that the strategy will be reviewed in 2015 or when preferred solutions to the capacity issues associated with the water treatment works have been identified (whichever is earlier).

It is important that environmental and infrastructure constraints are addressed as soon as possible to ensure that an adequate supply of development can be facilitated in the longer term to meet economic and social needs.

Shortening of Plan Period and increase in housing delivery requirements (MM1)

We welcome the Inspector's recommendation (MM1) to shorten the Plan period from 2030 to 2027, and the increase in annual housing completions from 400 to 450 units.

However, whilst the Inspector goes some way to increasing the overall housing figures, the Core Strategy still stops short of the 11,000 target figure identified within the South East Plan (SEP), and any other trend based figures, such as those based on ONS / CLG population and household trends, and ESCC migration led variants.

In his letter dated 5 March, the Inspector notes that the Council's preference is to use a range based on the ESCC variant and the midpoint between the Wealden and ESCC figures, which converts to give a range of 8,837 to 10,452 (2006 – 2026). The midpoint within this range is 9,644, which is still in excess of the revised upward target of 9,440 up to 2027 as recommended as a modification by the Inspector. This range is also based on very modest household projections that do not clearly relate to wider assumptions about the national and international migration and the need to stimulate greater economic growth in the Sussex Coast area.

Consideration should also be given to affordable housing needs in the District, which is identified within the Core Strategy as being 812 units per annum over 5 years, (equating to 4,060 dwellings). The Council are clearly not able to meet this identified need through the proposed housing targets and the targets therefore do not accord with the general thrust of the NPPF, which seeks positive growth for future generations and specific requirements based on identified need.

The Sustainability Appraisal (SA) that was carried out to assess the options that fed into the Core Strategy, considered two scenarios for additional dwelling numbers in the District; one being the SEP figure; the other being a reduced figure of 9,600 units. Therefore, the environmental impacts of accommodating a higher amount of development has been fully assessed as part of the preparation of the Core Strategy, and was found to be acceptable in the case for 9,600 units. The SA only found 'on a precautionary basis' that 11,000 units would have an adverse effect on sensitive sites and on the basis that no firm proposals to mitigate the impact were considered.

To this end, the Core Strategy should plan for a minimum requirement of 9,600 homes in the plan period to 2027.

Conclusions

Whilst our client, Hallam Land Management welcomes in principle the Proposed Modifications issued by the Inspector, it is considered that these are fairly conservative, and do not go far enough to address the acknowledged under provision of housing that will be delivered by the Core Strategy. If the Council want to improve the overall economic position of the District, a step change in housing provision is required. It is possible to address and implement the mitigation measures required to allow a higher housing target within the District over the Plan period, and the Inspector should encourage the Council to take a more proactive approach to this within the Core Strategy, reflecting the broad objectives of the NPPF, which encourages every effort to identify and meet the housing, business and other development needs of an area, responding positively to wider opportunities for growth.

We trust our representations will be duly considered by the Inspector and we would be happy to answer any questions or discuss in further detail the contents of this letter.

Yours sincerely

Claire Newbury
Associate Director

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 1, 5, 8, 10, 12, 18, 22, 25	**WS**
(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:	Whilst the Inspector goes some way to increasing the overall housing figures, the Core Strategy still stops short of the 11,000 target figure identified within the South East Plan (SEP), and any other trend based figures, such as those based on ONS / CLG population and household trends, and ESCC migration led variants. The environmental impacts of accommodating a higher amount of development have been fully assessed through the Sustainability Appraisal as part of the preparation of the Core Strategy, and this was found to be acceptable in the case for 9,600 units. The Core Strategy should therefore plan for a minimum requirement of 9,600 homes in the plan period to 2027. Please see accompanying letter dated 13 June 2012, which sets out further detailed reasoning.

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:	Miss C Newbury Turley Associates

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 5, 6, 8, 9, 16, 17, 43**
(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:	Phasing is not justified by infrastructure constraints and therefore presents an unnecessary hurdle to delivery and reduces the flexibility and responsiveness of the plan in reacting to changing circumstances. For consistency and clarity, we suggest that the Land East of Hailsham and Land North of Hailsham (SD2 and SD3) should be combined as a single SDA within the housing trajectory in Figure 5. It was agreed at the examination that there was no justification for phasing land to the East ahead of land to the North and this further modification would avoid any subsequent confusion and ensure that immediately deliverable sites to the North can come forward to address housing supply issues and provide a new primary school, which is required in the short term. Please see accompanying letter dated 13 June 2012, which sets out further detailed reasoning.

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:	

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 14	**WS**
(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:	In view of the recognition that it has not been demonstrated that there is a demographic basis to support lower housing provision than in the South East Plan (MM4), we welcome the addition within the supporting text to Policy WCS1 (MM14) that the strategy will be reviewed in 2015 or when preferred solutions to the capacity issues associated with the water treatment works have been identified (whichever is earlier). Please see accompanying letter dated 13 June 2012, which sets out further detailed reasoning.

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:	Miss C Newbury Turley Associates

E-Mail Address:	
If on behalf of a company, please state:	Hallam Land Management
Date:	13.06.12

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.