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Head of Planning and Environmental Policy
Wealden District Council
Freepost SEA 10959
Crowborough
East Sussex
TN6 1BR

16 May 2012

Our ref: 231701

Dear sir/madam,

Proposed Modification to the Core Strategy Development Plan Document

We write on behalf of our client Marchfield Management Services LLP (Fairfield Partnership) in response to the above consultation.

As set out within our previous representations on the Core Strategy our client controls land to the north of Hailsham (SHLAA site reference 243/1310), which is located within the proposed North Hailsham Strategy Development Area (SDA). The site has capacity to provide a significant proportion of the 700 new dwellings identified for this SDA.

Our client is generally supportive of the modifications proposed to the Core Strategy, both by the District Council / South Downs National Park Authority and the Inspector, in particular the entries regarding phasing being confirmed to be indicative only.

It is noted however that no modification is proposed with respect to the first sentence of paragraph 5.16 which states that *'Post 2015 the aim is to phase delivery such that new housing development is delivered at a constant rate in order to ensure that there is a continuous housing supply throughout the Plan period, allowing for market considerations, the ability of our community to assimilate growth and the development and delivery of necessary infrastructure.'* It is assumed that this is an oversight, however this paragraph should also be modified to ensure that the Core Strategy is sound in this respect.

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In addition to the above comments our client has concerns with respect to the following modifications, which are also referred to on the enclosed completed representation forms:

Ref: WS4 in relation to policy WCS4

As highlighted separately within representations to the Programme Officer on the implications of the National Planning Policy Framework (NPPF) for the Core Strategy, paragraph 14 of the NPPF highlights that:

- at its heart is a *'presumption in favour of sustainable development'*
- *'local planning authorities should positively seek opportunities to meet the development needs of their area'* and
- development proposals that accord with the development plan should be approved without delay.

Paragraph 153 of the NPPF states that '*Each local planning authority should produce a Local Plan for its area'* and that 'A*ny additional development plan documents should only be used where clearly justified.'*

Paragraph 156 refers to local planning authorities setting out strategic priorities for the area in the Local Plan, with paragraph 157 making reference to Local Plans indicating *'broad locations for strategic development on a key diagram and land-use designations on a proposals map.'*

The Council's Local Development Scheme (LDS) and the Core Strategy refer to a Strategic Sites Development Plan Document (DPD) and is noted that an issues and options consultation on this DPD was carried out earlier this year. The LDS states that this document will establish the exact location of development within the SDAs through the identification of strategic sites and that each site will be presented on the proposals map and supported by specific policies applicable to that site.

Whilst the Core Strategy was prepared prior to the NPPF, we do not consider it necessary to set detailed boundaries for the strategic allocations through an additional tier of planning policy, in the form of the Strategic Sites DPD. The exact location of development within each SDA can be better addressed through the planning application process, which will realistically address landownership and delivery issues as well as identifying sufficient deliverable land necessary to mitigate any environmental and/or infrastructural impacts of the strategic development. Development control policies will be incorporated within the Delivery and Site Allocations DPD, also included as part of the Council's LDS, and these can be used to set criteria for development. The Strategic Sites DPD is unnecessary, and will cause additional delay. It is therefore in conflict with the principles of the NPPF.

In light of the above, reference to the Strategic Sites DPD within the Core Strategy (including within proposed modification WS4) is considered to render it **unsound** on the basis of being contrary to national policy. This can however be easily rectified through the deletion of all references to the Strategic Sites DPD from the Core Strategy and removal of reference to 'including phasing where necessary' in the last sentence of proposed modification WS4.

Ref: WS6 in relation to Figure 5 'Indicative Delivery of Housing Development'

With respect to the land controlled by our client, the modification to Figure 5 refers to an indicative start date for the North Hailsham urban extension of 2017. Our client's site is available now, suitable for development (being in a sustainable location, directly adjacent to the existing urban area) and deliverable. Subject to planning permission being secured, housing could realistically be delivered on the site by 2015.

We trust that the above comments will be given full consideration prior to the adoption of the Core Strategy.

Yours faithfully,

Nick Guildford
Associate Director

cc Marchfield Management Services LLP (Fairfield Partnership)

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**
(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:	Refer to covering letter dated 16 May 2012 (ref: 231701).

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:	Nick Guildford (on behalf of Terence O'Rourke Ltd)

Name and Address:	Terence O'Rourke Ltd Everdene House Deansleigh Road Bournemouth BH7 7DU
E-Mail Address:	
If on behalf of a company, please state:	Marchfield Management Services LLP (Fairfield Partnership)
Date:	16 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 ☒ 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 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

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.

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 6**
(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:	Refer to covering letter dated 16 May 2012 (ref: 231701).

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:	Nick Guildford (on behalf of Terence O'Rourke Ltd)

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Date:	16 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 ☒ No ☐
I would wish to be notified of the adoption of the Core Strategy	Yes ☒ No ☐

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