Wealden District ~~Council's~~ (~~-~~Incorporating part of the South Downs National Park)~~submitted~~

Working in Partnership

This response relates to the p~~p~~roposed ~~Inspectors m~~modification	
MM	**WS 10, WS2, WS3, The National Framework**
(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 National Planning Policy Framework ('the Framework') materially changes the housing related background to the proposed Core Strategy (CS), and creates some inconsistencies which might lead to an undersupply of housing over the plan period. In his letter dated 28th May 2012, the Local Plan Inspector clearly states that the Framewor aims to 'significantly' boost the supply of housing, there being a need to identify and update 'annually a supply of deliverable sites sufficient to provide 5 years growth'. A buffer is also required where there has been persistent under-delivery. The Inspector goes on to state that 'it has been suggested that the CS is not consistent with this part of the Framework'. It is our Client's concern that the CS has not been 'positively prepared' and that this will lead to an undersupply of housing over the Plan period. It is welcomed that the Council propose a policy on sustainable development, but there are possible deliverability problems in the Council's housing policy, which have not been resolved by the proposed modifications. The CS does not therefore, fully comply with the Framework Our Client is of the view that para. 47 of the Framework needs to be objectively applied, with evidence presented to the Inspector and public that Wealden's housing supply projection (inc. a buffer) can indeed be met. Para. 48 on windfall sites also needs to be more positively referred to in the CS. It is also noted that the Framework seeks a 'mix of housing' to meet the 'needs of different groups'. Most importantly, the Framework refers to sustainable housing development in rural areas, and refers to a situation where development in one village might support services in a village nearby. LPAs should be 'responsible to local circumstances and plan housing development to reflect local needs'. It is stated that ' housing should be located where it will enhance or maintain the vitality of rural communities'. In our view, this new policy marks a shift towards allowing housing in a wider number of sustainable locations in Wealden that the CS omits (whilst still containing the largest proportion of housing development in the larger settlements). The background to our Client's concerns is that the CS promotes (at para 3.7.) 'countryside constraints to neighbourhood centres and other unclassified settlements'. Table 9.2. contains a list of revoked village development boundaries. NO LESS THAN 25 SETTLEMENTS ARE REMOVED FROM THE HOUSING PROVISION POLICIES OF THE CS AND PLACED UNDER DEVELOPMENT CONSTRAINT Proposed Modification policy WCS5 now allows for monitoring so that there can be a closer link between housing delivery and infrastruture provision, but it is contended that the removal of 25 settlements with development boundaries will prejudice the implemetation of this revised policy and revised policies WCS1 & WCS2. The extended housing aspirations of the Framework, having regard to the fact that Wealden Council has had a settlement hierarchy in place which included the 25 smaller settlements since 1998 running through to the 2005 plan, need to be re-assessed in the context of the CS. There has been an historical acknowledgement in the District that smaller settlements with services and good transport links have a role to play in Wealden's overall housing provision, and this has, in fact, led to the growth of some villages into more sustainable locations. It seems to be a backward move in housing provision terms to take villages like Five Ashes out of the CS's housing provision figures. They could continue to make a small but valuable contribution

	Now that the Framework has been issued and is in force, there is a need to ensure that the CS complies with it. In a housing context, our client is of the opinion that this should involve a re-assessment of the settlement heirarchy and a re-look at the 25 settlements to see which ones have become more sustainable since 1998. Our Client owns a possible small housing site in the village of Five Ashes. Whilst this objection does not specifically seek to promote Five Ashes' development boundary to be reinstated - our comments refer to the need in the context of the Framwork for ALL of the settlements in Table 9.2. of the CS to reassessed - we refer to Five Ashes as an exampl of where future sustainable housing development in a smaller settlement might be possible. Five Ashes has grown significantly since 1998 (i.e since Council poilcy imposed a development boundary) and more recent housing has been built there that supports the maintainence of the services in the Mayfield. It should be noted that there are bi-hourly bus services to and from Mayfield and the journey time is only 6 minutes (see: http://www.stagecoachbus.com/PdfUploads/Timetable_8520_EASTBOURNE%2051.pdf These bus services allow Five Ashes residents without cars to access and use the wide range of services within Mayfield, which are listed at http://www.mayfieldfiveashes.org.uk/Village/v_directory.html. The Framework mentions situations where residential development in one village might support services in another so further small scale residential development within Five Ashes over the CS Plan period might be acceptable, and there might be other similar settlements to this. Furthermore, it sould be noted that Five Ashes has two schools - Skippers Hill Manor Preparatory School and Five Ashes CE Primary School. These schools would make a material contribution towards reducing car journeys, with children in Five Ashes getting to school via a short walk. The Village also contains a small number of business premises and has a village hall available for hire for social and entertainment purposes. Thus, Five Ashes has become a more sustainable location than it used to be, precisely because of the Council's historic settlement heirarchy. There might be other similar or even better examples of village settlements that have become more sustainable Now that there is a need for the CS to comply with the National Framework - which is a crucial important new material consideration - in our opinion there is a need to review the settlement heirarchy, look at the 25 settlements that have been removed and RE-INCLUDE THOSE THAT ARE CONSIDERED SUSTAINABLE LOCATIONS. This would make a material contribution to the housing projections and would result in a plan that has been 'positively prepared'. We are of course not saying that all 25 settlements should be re-included, or that the integrity of the Council's rural, landscaping and biodiversity policies be threatened in any way, but there are villages that, like Five Ashes, have become more sustainable over time because of the Council's own policy and whose re-introduction into the housing projections of the CS might be considered a sustainable and postive move.

	If the settlement heirarchy is re-structured to (a) include some of the more sustainable 25 excluded settlements and (b) to not be so restrictive towards smaller, sustainable settlement locations then a signifcant positive contribution towards revised policies WCS1, WCS2 (an increase in the rural villages housing figure) and WCS5 will be made and a better more complimentary relationship with the Framework will be acheived. Regarding revision WS3, it should be noted that the re-introduction of SOME of the 25 settlements, such as Five Ashes, as sustainable housing locations would help support this policy. Small scale housing sites might be identified within the re-introduced development boundaries. We would add that the re-introduction of some of the currently revoked settlement boundaries will provide for future flexbility in housing supply and provide a CS that will be far more responsive and locally based (i.e. allowing for local decisions to be made on village growth or constraint). It does seem something of a backward step to exclude all 2 of the smaller settlements, which has created a CS that is out of step with the National Framework.

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:	Peter Kyte MRTPI Enabling Projects (Town Planners)
E-Mail Address:	
If on behalf of a company, please state:	objection lodged on behalf of: Mr & Mrs Barnes
Date:	12th 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 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.