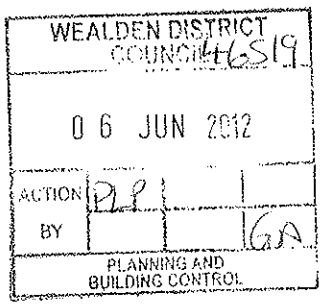
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Head of Planning & Environmental Policy,
Wealden District Council,
FREEPOST SEA 10958,
Crowborough,
East Sussex,
TN6 1BR

Our Ref: KLW/11/00126



Date: 1st June 2012

Dear Sir,

WEALDEN DISTRICT COUNCIL & THE SOUTH DOWNS NATIONAL PARK AUTHORITY

PROPOSED MODIFICATIONS TO THE CORE STRATEGY DEVELOPMENT PLAN DOCUMENT

We refer to your consultation exercise on the proposed modifications to the Wealden District Council (incorporating part of the South Downs National Park) Submitted Core Strategy Development Plan Document following its Examination in Public earlier in the year. Thank you for notifying us of the extension to the consultation period to run, now, until the 13th June.

We represent the interests of the Neville Estate Company Limited: Consultee ID: 534840 Agent ID: 103948. The Estate has a controlling interest in substantial tracts of land across the north of the district, adjoining the southern fringes of Tunbridge Wells, and has a number of smaller land holdings including land off Brook Close in Jarvis Brook. The latter is referenced at SD9 within the draft Core Strategy. In the context of this land holding and the Estate's wider land interests across the High Weald Area of Outstanding Natural Beauty (AONB), we have prepared a series of representations to the modifications proposed by Wealden District Council (referenced 'WS') and to the main modifications proposed by the Inspector (referenced 'MM'). Where appropriate the representations are cross-referenced with the National Planning Policy Framework, which was published on 27th March - after the Inspector's reporting on the main modifications at the beginning of the month.

The representations are included on your standard pro-forma and are referenced: WS2, 5, 7, 25, 35 and 40 and MM10 and MM33. We would be grateful if the Inspector could take these into

Partners: J M Williams *BA(TP) MRTPI* M D Hull *BA(Hons), MA, MRTPI* R P Nightingale *BA(Hons), DipUPI, DMS, MRTPI*
J Black *BSc(Hons), Dip(Urb Des), MRTPI* Aviation Planning Consultant: P J Kember *DipTP, MRTPI, MRAeS*

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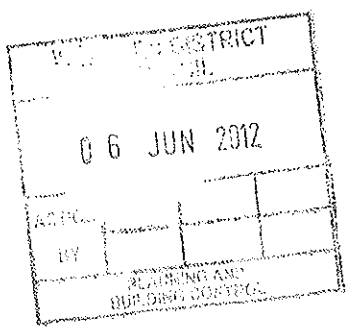
consideration prior to issuing his final report to the Council. If you have any queries regarding the submissions please feel free to contact me at any time.

Yours faithfully,

Julian Black MRTPI
Kember Loudon Williams LLP

Cc Mr John Bee – Neville Estate Company Ltd

Enlcs.



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 10	**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:	Ref MM10, page 25, paragraph 5.3 The Inspector's recommended modification should now include reference to the National Planning Policy Framework in relation to phasing and to the 20% requirement for front loading housing land supply. This would relate to the early part of the plan period for the Core Stratey: as amended to cover the period April 2010 - March 2027.

WEALDEN DISTRICT COUNCIL
06 JUN 2012
ACTION BY
PLANNING AND BUILDING CONTROL

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

WEALDEN DISTRICT COUNCIL
06 JUN 2012
ACTION
BY
PLANNING POLICY

This response relates to the proposed modification	
MM 33	**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:	Ref MM33, page 64 Policy WCS12 The option of securing legitimate financial contributions towards off-site Suitable Aleternative/Accessible Natural Green Space (SANGS) should be facilitated to support the early deilvery of allocated sites. It would not be appropriate for allocated sites to be withheld and the supply of housing held back as a consequence where the potential for the provision of alternative green spaces exists elsewhere that could be unlocked through financial contribution. This may be secured through the Section 106 regime as part of the regular planning process. Alterative forms of localised and sustainable development that contribute to the economic growth and tourism development will be assessed on their merits in accordance with the underlying presumption in favour of the National Planning Policy Framework and the Council's adopted Tourism Strategy. It is essential that the policy or the reasoned justification conveys support for economic generating uses within the broader framework of the acknowledged need to protect the Ashdown Forest Special Protection Area. If this support is not forthcoming within the policy regime, there is a danger that the rather arbitrary 7 kilometer zone of influence will stagnate large tracts of the High Weald in the medium to long term. Whilst the ecological interests and importance of the Forest are fully acknowledged a balance needs to be struck between these interests and other equally important interests of acknowledged importance. It is also queried whether in real terms enough assessment work has been done to explore other opportunities and mitigation measures to address this particular environmental issue. Restricting development is not necessarily going to achieve the benefits being sought.

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 2**
(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:	Ref WS2, page 22, Policy SPO3. The text should be amended to take into account the changes brought about by the National Planning Policy Framework and, in particular, to the presumption in favour of sustsainable development. With reference to the provision of new homes and ensuring economic prospertity, the text of the policy should be amended to confirm that the Council will take a positive approach towards development proposals that reflect the presumption in favour of sustainable development. In line with the Planning for Growth Agenda, the text should confirm that proposals for new housing which accord with the policies of the Core Strategy will be approved without delay unless material circumstances indicate otherwise.

WEALDEN DISTRICT COUNCIL
06 JUN 2012
ACTION
BY
PLANNING AND BUILDING CONTROL

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 25**
(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:	Ref WS25, page 49, Figure 9 - Crowborough Area Study: The Key Diagram for Crowborough should identify SD9 (Infill at Jarvis Brook) for early commencement to support the early delivery of new homes in the 2015 - 2016 period. This would help to meet the National Planning Policy Framework target of 20% of the housing provision being front loaded.

WEALDEN DISTRICT COUNCIL
0 6 JUN 2012
PLANNING AND BUILDING CONTROL

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 35**
(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:	Ref WS35, page 64, Policy WCS12 - Biodiversity The scope of the policy should be expanded to include reference to Suitable Alternative/Acessible Natural Green Space (SANGS). Integral to the policy should be a clear statement advising that if SANGS cannot be provided on site and integrated with new housing development the Council will actively support a financial contribution towards the provision off-site. It would not be appropriate for allocated sites to be withheld and the supply of housing to be held back as a consequence where the potential for the provision of alternative green spaces exists elsewhere and could be unlocked through financial contribution. This may be secured through the Section 106 regime as part of the regular planning process.

WEALDEN DISTRICT
06 JUN 2012
ACTION
BY

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 40**
(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:	Ref WS40, Key Diagram The Key Diagram needs to ensure that the SD9 (infill at Jarvis Brook) residential development location is identified as an area for early housing delivery.

WEALDEN DISTRICT COUNCIL
06 JUN 2012

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**
(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:	Ref WS5, page 30, paragraph 5.16. The text should be amended to take into account the changes brought about by the National Planning Policy Framework. An emphasis should be placed on the 'front loading' of housing land supply of up to 20% where historic under provision has occurred. The text should acknowledge the undersupply of housing within the District in previous plan periods and, as a consequence, should support an increase in housing delivery in the early period of the Core Strategy. The reasoned justification for this should be stated as creating a realistic platform for the Council to achieve its planned supply and to ensure choice and competition within the market for housing land.

WEALDEN DISTRICT COUNCIL
06 JUN 2012
ACTION
BY

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

WEALDEN DISTRICT COUNCIL
06 JUN 2012
ACTION BY
PLANNING POLICY

This response relates to the proposed modification	
MM	**WS 7**
(Please add numeric reference e.g. MM22 or Wealden District Council/ South Downs National Park Authority modification WS e.g. WS 23)	

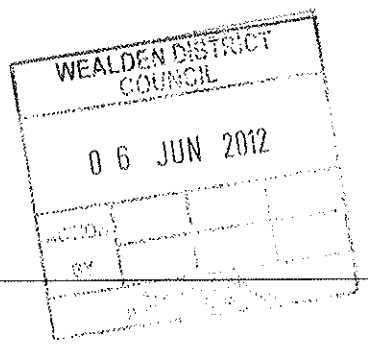
Declaration:	I consider the proposed modification will assist the submitted Core Strategy to be found sound ☒ /unsound ☐ (*place a cross in the box to show which option you have chosen) for the following reasons:
Reasons Given:	Ref WS7, Page 31, Figure 5: Figure 5 should be updated to reflect the 20% increase in housing land supply required by the National Planning Policy Framework and a meaningful emphasis should be placed on 'front loading' the delivery of housing. The latter will require some of the strategic sites identified in Figure 5 to be brought forward earlier in the plan period than the current phasing of development allows. At present the SD9 site (Land at Jarvis Brook, Crowborough) is programmed for the period 2019 - 2020. In the context of the Governement's growth agenda and its unwaivering commitment to the delivery of sustainable forms of housing in locations with locational advantage, the phasing regime set out in Figure 5 should be amended to identify the SD8 and SD9 - Crowborough Urban Area - earlier in the delivery process. The 2015 - 2016 period onwards. This would have the added benefit of helping to meet the clear and demonstrable need to 'front load' the delivery of housing in accordance with the provisions of the National Planning Policy Framework. Land off Brook Street, Jarvis Brook within the SD9 Area is ready and available now and the land owners are willing and able to progress the site. On the provision that a financial contribution is made to the provision of Suitable Alternative/Accessible Natural Green Space (SANGS) through the regular Section 106 process or, alternatively, suitable on-site provision of open/green space is made to mitigate the percieved potential impacts upon the Ashdown Forest Special Protection Area (SPA), there are no policy constraints to the early delivery of the SD9, Crowborough Urban Area, in the 2015 - 2016 period.

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:	Mr Julian Black, Kember Loudon Williams LLP,



E-Mail Address:	
If on behalf of a company, please state:	Neville Estate Company Limited
Date:	28th 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.

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.