13/06/2012 12:43
"John Watts"
Re: Wealden District Council & The South Downs National Park Authority, Core Strategy Examination

Attention : Ms Benton – Programme Officer, Wealden Core Strategy Examination
Date :
Our Ref :

Dear Ms Benton

I write in response on the invitation to comment on the assessment of the Core Strategy.

We are in receipt of your letter to Wealden District Council dated 24th April 2012, headed "National Planning Policy Framework – Presumption in Favour of Sustainable Development"; and the reply from Wealden District Council dated 9th May 2012.

Whilst we welcome the inclusion of the model policy into the Core Strategy, we are of the opinion that the Council's suggested explanatory text appears to be more of an attempt to sidestep the requirement than to embrace the Framework, where it refers to "*Proposed development that conflict with an up-to-date Local Plan should be refused unless other material considerations indicate otherwise*". In our opinion, if permitted, it will result in diluting the positive thrust of the Framework, at the heart of which is a presumption in favour of sustainable development. We conclude that the Council suggested explanatory test is designed to maintain the previous regime at the expense of the Framework, thus maintaining the culture of overburdening disproportionate planning controls. (We are aware that such a stance is not limited to this Council, which if endorsed, could lead to other councils following suit). The Framework clearly states that it must be taken into account in the preparation of local and neighbourhood plans and is a material consideration in planning decisions. The Council suggested explanatory test, in our opinion, is unnecessary and should be omitted; or at the very least amended to bring it into conformity with the spirit of the Framework.

We are aware of the wide and detailed representations expressing concern made by others on the Core Strategy and do not propose to repeat in detail all the arguments contained therein.

However, the Core Strategy fails in several respects to reflect the requirements and spirits of the National Planning policy Framework.

The Framework represents a significant change of direction in the determining of planning applications. The approach that councils should take to sustainable development should be positive, engaging with applicants to arrive at solutions

wherever possible with development proposals. We are of the opinion that the Core Strategy in its present form amounts to a conservative and less than proactive approach to the planning process, which the Framework is designed to change.

The Core Strategy signally fails to provide the full housing requirements of the SEP, resulting in an incremental shortfall year on year, which will result in an unacceptable under-provision of homes in future years. For this reason, the housing provision should be front end loaded so that there will be adequate time in later years to make up on the previous and current deficits. Larger housing developments, because of their associated necessary infrastructure take time to come to fruition. Whereas the contribution of smaller rural windfall sites of, say, up to twenty dwellings in and around existing settlements, can respond more rapidly, particularly where they are in locations not requiring significant infrastructure provision; and where their impact on the environment would be minimal. To meet the front ended housing requirements, full consideration should be given to the contribution of small sites.

The Core Strategy fails to include a positive approach to balancing environmental concerns and the requirements of adequate levels of sustainable development and in this respect it is not compliant with the Framework.

The Core Strategy does not adequately address the issue of the Duty to Co-operate which is contained in the Framework and requires public bodies to co-operate on issues that cross boundaries of neighbouring authorities, to their mutual benefit. The Framework states, inter alia "*joint working should enable local planning authorities to work together to meet development requirements which cannot wholly be met in their own areas"*. This is two-way and should be demonstrated as being so with the Core Strategy.

Yours faithfully

John Watts

Olorun Planning Partnership Ltd