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 33	**WS WCS12**
(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 Core Strategy forms the Strategic Development Plan Document against which to consider future devleopment within the District. The adoption of the Core Strategy with so many unknown elements will prevent the delivery of any windfall development sites (or sites unable to provide Suitable Alternative Natural Greenspaces(SANGS) within 7km of the SPA for an unknown length of time. Such delays will have a significant and adverse impact on housing delivery within the District and the effected areas more specifically and this is not acceptable. There continues to be high levels of completions on windfall sites, and of the 709 total completions in 2010/11, 358 of these were on windfall sites. (WDC AMR 2010/11). Over 50% of the effected areas housing supply could therefore be removed by the imposition of such policies, without appropriate mitigatory provisions in place. Until SANGS are identified and a mechanism to deliver financial contributions towards there maintenance etc is put in place by an Adopted Development Plan Document (Delivery and Sites Allocation Development Plan Document) the Council have stated clearly that they will refuse any net gain in dwellings within 7km of the SPA. Housing must be delivered at a rate of 450 dwellings per annum, including the provision of much needed Affordable Housing units. Removing Windfall Site developments from this equation for a period of at least 3 years will have a significant and adverse impact on housing delivery in the effected towns and villages, contrary to the provision of the key objectives of the Core Strategy and the NPPF. The proposed allocation of 300 new homes in Crowborough cannot alone provide for the required growth in housing need in the town and will not provide for the necessary Affordable Housing levels. The WDC Housing Needs Assessment identified 305 Households on Housing Register within Crowborough alone. Of these 305 households 84% or 256 households are in 'current need'. The delivery of housing and affordable housing is therefore a key priority for the District which will be severely compromised by the proposed policy stance. The SPA is not a new designation for the District and mechanisms to mitigate new development near to the area (not within 400m) has been put in place at many Authorities dating back more than 5 years. The Thames Basin models are cited also by Mid Sussex District Council in relation to their proposed policies relating to the Ashdown Forest SAC and SPA. The Council were fully aware of their responsibilities under the Habitat Regulations in protecting such areas and the Core Strategy should have taken these issues into full account from the outset of the LDF. The Habitat Regulations Assessment results in the need to distribute development to towns and villages in a way that does not adversely affect the Ashdown Forest in relation to recreational pressure and also nitrogen

	deposition from traffic. Suitable alternative natural green space (SANGS) is also required in order to mitigate development and reduce recreational pressure in the Ashdown Forest SPA and SAC. Mitigation will also be required within the Pevensey Levels hydrological catchment area through the provision of Sustainable Drainage Systems (SuDS). The detail ofthis will be addressed further within relevant DPDs. (WDC AMR 2010/11) Nothing was or has been done to forward the provision of a DPD in the intervening time period. To leave such a void in housing delivery would make the Core Strategy Unsound as it stands as the provision of SANGS should have been considered in the same vein as the major housing allocations considered in the Core Strategy. At present significant concern is expressed that the Council will not be able to deliver its suggested housing numbers due to the inabilty to deliver windfall housing sites (which make up to a large percentage of overall numbers) within 7km of the SPA, effecting key settlements such as Crowborough, Uckfield, Maresfield, Buxted etc. 'Any development coming forward from windfall sites could help to maintain the housing land supply in the case of unforeseen difficulties associated with bringing forward allocated sites. Development on windfall sites could particularly help as regards housing land supply within the towns.' WDC Managing the Delivery of Housing Background Paper. February 2011 Focusing housing delivery only outside of the 7km exclusion zone is not considered to be sustainable and this will have a significant adverse impact on the vitality and viablity of the effected towns and villages. There is no ability to accommodate exceptions sites for affordable housing in the effected areas and this issue has not been addressed within the consideration of this matter. Protection of the SPA is taking precedence over the deliver of much needed homes, employment sites and other development which are needed to meet the key objectives of the Core Strategy and the NPPF. A balance needs to be struck between conservation and development need and the Core Strategy as drafted places a moritorium on development within 7km of the SPA, SAC which will have a significant and adverse impact on the effected towns and villages. Without the direct allocation and provision of SANGS or mitigatory mechanisms to deliver new development within 7km of the designated areas the Core Strategy must be found unsound as it cannot deliver the development targets set out in respect of housing and employment. The impact of nitrogen deposition on the Forest is acknowledged to need further investigation within the Core Strategy, however the Council consider that any development within 7km generating additional car movements will be refused due to their impact on nitrogen deposition on the Forest.

	There is clearly limited understanding of this issue, with many other issues failed to be considered in respect of nitrogen depostion on the Forest and what are the main causes and how these can be mitigated. The adoption of the Core Strategy as drafted would result in a moritorium on new development with 7km of the Forest which generates traffic. Such a stance is completely polarised with the objectives of the Core Strategy in delivering a sustainable place for people to live and work and visit. The Forest is clearly defined as an asset to the District attracting visitors, who contribute significantly to the economic wellbeing of the District. The proposed wording to the Core Strategy removes the ability even to propose new tourism related development within 7km of the Forest, which is neither sustainable nor sound in planning terms. The adopted approach will cause stagnation of the effected areas, which cover huge swathes of existing settlements and built up areas. The inability to deliver new housing, new employment, new tourism facilities or any development that is deemed to increase nitrogen deposition on the Forest is fundamentally polarised to the key objectives of the NPPF and the Core Strategy. Such paradoxical objectives cannot reasonably be considered at this stage without further research and mitigatory measures put in place as 'no development' is not a sustainable answer to these issues. A balance must be struck in deliverable planning terms in order for the Core Strategy to be found sound in relation to these issues or the effected population living, working and visiting the effected areas will be significantly effected to the severe detriment of the future of the District. Sustainability as clearly defined in the NPPF; ensuring that better lives for ourselves don't mean worse lives for future generations. It is clear that the proposed modifications to the Core Strategy will mean worse lives for future generations due to the inability to deliver much needed development within 7km of the Forest. Until such time as the Allocations of Land Document provides SANGS and the abiility to mitigate new housing within 7km of the SPA the presumption should be in favour of new development rather than producing a moritiorium on development. The Core Strategy in order to be found sound must directly provide for such land and mitigatory measures. The Council state that the Allocation Document may be adopted by 2015, however on the basis of the significant timescales the Council have taken to move forward their Core Strategy to this stage the equivalent delays may not see such documents being adopted until far later, causing further, unneccessary delays to sustainable developments.

	The significant unknowns relating to the key causes and impacts of nitrogen deposition on the Forest must be understood further before the Core Strategy again places a moritorium on developments within 7km of the Forest. A balance must be achieved in order for the Core Strategy to deliver its key objectives, however the current Core Strategy fails to consider the ramification of such a moritorium on certain developments within 7km. The proposed Core Strategy is therefore considered to be unsound in this respect and should not be adopted for the aforementioned reasons. In this regard I would suggest that the Core Strategy in this matter would be unsound in respect of; Not positively prepared; Failing to take account of key objective findings in relation to housing delivery and employment requirements within 7km of the designated areas. Not Justified fully; The strategies in this regard are not appropriate in the circumstances, relevant alternatives have not been fully considered and the evidence base relating to harm from visitor pressure and nitrogen deposition is clearly not robust or credible due to the need for further investigation) Not Effective; The plan is not deliverable over its plan period in respect of the effected areas within 7km of the forest until such time as the issues are fully understood and relevant mitigatory mechanisms are put in place. Not Consistent with National Policy: Inconsistent with objectives of the NPPF in respect of delivering sustainable development

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:	Chris Barker

Name and Address:	ECE Planning

E-Mail Address:	
If on behalf of a company, please state:	Penden Homes Ltd
Date:	11.6.2012

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.