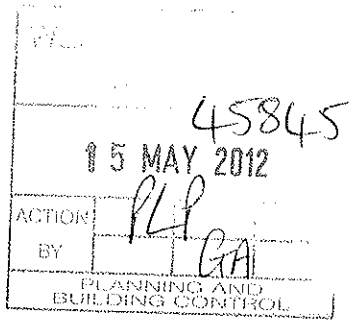
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H Reilly

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

Our Ref: 11-053JW

15th May 2012

Dear Sir

Re: Wealden District Council & The South Downs National Park Authority Core Strategy Examination.

Representations in respect of proposed modifications

Ref: MM20 - Policy WCS4

We represent Mr H Reilly, in respect of land adjoining the eastern side of Heathfield. Our interest remains principally in the Heathfield Area Strategy and Core Strategy (CS) policy WCS4 and strategic development area SD11.

Having reviewed evidence and following the Examination, the Inspector has decided to rule out any strategic housing allocations for Heathfield. Given the constraints that now are applied to development within 7 kms of the Ashdown Forest and which affect the Pevensey Levels, there is even more reason to re-consider alternative strategic locations that avoid creating environmental impacts on these designated areas. Heathfield represents the clearest alternative location for a strategic housing allocation given its relative lack of constraint in terms of infrastructure and facilities that has been demonstrated in submitted evidence. It is beyond the 7 kms zone of the Ashdown Forest and housing in this location will not impact on the designated area.

Whilst it is acknowledged that Heathfield is surrounded by AONB, submitted evidence comprising a landscape appraisal shows that the land that we have promoted on behalf of Mr H Reilly would not result in any significant impact on the AONB. The land is of a sufficient size and location to provide a comprehensive range of housing including affordable homes, community facilities, open space and public access, landscape and environmental enhancement and highways improvements. The land has also been shown to have low levels of ecological and other constraints.

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

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As it stands, the CS makes no strategic provision for Heathfield as a town or community which would seem to be contrary to Section 8 of the NPPF. It is difficult to see how this approach contributes to a sound CS. The allocation of the land we have promoted would provide the means by which improved community facilities including open space for sport and recreation, can be provided as an integrated development package that achieves the level and standard of provision expected in the NPPF. The indicative layout put forward in our 'concept proposal' also provides an opportunity to enhance public access and rights of way and to create the sort of green spaces that the NPPF sees as being important for community benefit in the long term.

The reintroduction of a strategic allocation for Heathfield on this land would allow the requirements of paragraph 50 of the NPPF to be fulfilled in all respects, including the provision of a wide choice of high quality homes, the creation of sustainable, inclusive and mixed communities and affordable homes. Excluding new housing growth for Heathfield in the CS would deny this specific town the opportunity to bring forward new, sustainable growth which would not meet the aims of the NPPF. In this context, paragraph 52 may be a key part of the NPPF where it advocates that the supply of new homes can sometimes be best achieved through the planning for larger scale development, such as the extension of existing villages that follow the principles of Garden Cities as a way of achieving sustainable development. The reintroduction of a strategic allocation for Heathfield on the land we have promoted can meet the objectives and guidance in this part of the NPPF given its overall lack of constraint and the freedom of opportunity to bring about sustainable development that adheres to the principles set out in the new Guidance.

It would logically follow that given the heightened level of constraint that has been identified for sites within 7 kms of the Ashdown Forest and that affect the Pevensey Levels, an urgent re-focus is required on Heathfield as a strategic provider of housing and growth. It is acknowledged that the NPPF affords high levels of protection to the AONB, but it does not rule out development in these areas altogether, the objective is to ensure that appropriate sustainable growth is accommodated in a way that meets that criteria in the NPPF (paragraph 115).

The Inspector's comments at paragraphs 25-28 of his recommendations imply that an allocation in Heathfield is not altogether ruled out provided further evidence is produced by the Council to show that an allocation could meet the three tests in paragraph 22 of PPS7 (now superseded by Paragraph 116 of the NPPF). If this avenue is pursued by the Council, it is imperative that all potential land allocation options are considered and that the Council do not simply apply a 'one site approach', ie towards the previous SD11 land. If a further appraisal is to be carried out, it can no longer be done so on the basis of PPS7 criteria and so the basis for such consideration needs to be explicit in the CS. Any subsequent DPD that considers the potential housing allocation should take a broad approach and potentially to consider a multi-site approach. Again this needs to be made explicit in the CS. Should the Council decide that the way forward for Heathfield is for a range of smaller sites to be identified in a subsequent 'small sites allocation DPD', then for clarity this should be explicit as part of CS policy in WCS4, given that SD11 has been omitted.

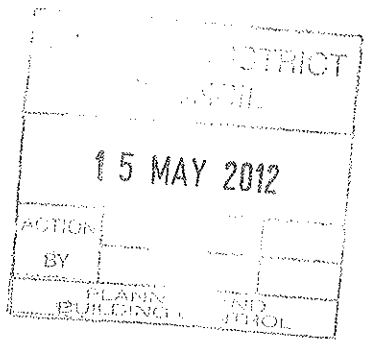
WEALDEN DISTRICT COUNCIL
15 MAY 2012
ACTION
BY
PLANNING AND BUILDING CONTROL

In the absence of a strategic housing allocation for Heathfield, this approach would at least create a level of certainty for future housing provision for the Town.

Yours sincerely

Jon Williams MRTPI (Partner)
Kember Loudon Williams LLP

cc. Mr H Reilly



Wealden District (Incorporating part of the South Downs National Park) Representation on the Proposed Modifications to the Core Strategy

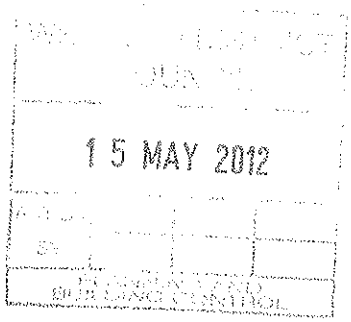
Wealden District Council

Working in Partnership

South Downs National Park Authority

This response relates to the proposed modification	
MM 20	**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 (*delete as applicable) for the following reasons:
Reasons Given:	Please refer to attached comments



If this is a new matter that you have raised please complete the following I wish/ do not wish (*delete as applicable) for this matter to be heard in front of the Inspector

Signed:	on behalf of Mr H. Reilly

Name and Address:	Jean Williams Tanner Hanson Williams LLP
E-Mail Address:	
If on behalf of a company, please state:	Tanner Hanson Williams LLP
Date:	15TH MAY 2012

Please delete as appropriate	
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.