Wealden District (Incorporating part of the South Downs National Park) Representation on the Proposed Modifications to the Core Strategy – National Planning Policy Framework Presumption in Favour of Sustainable Development

Wealden District Council

Working in Partnership

South Downs National Park Authority

This response relates to the proposed modification WS WCS14 Presumption in favour of sustainable development

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:	Whilst the inclusion of a model policy based upon the wording set out in Paragraph 14 of the National Planning Policy Framework is welcomed, it is not considered that this would be sufficient to bring the Local Plan/Core Strategy into step with the NPPF to the extent that it is sound. Firstly, it is considered that the proposed policy should be located nearer to the front of the Local Plan, rather than as proposed sited at the end of Chapter 7. It is suggested that this policy – reflecting as it does a core constituent of the Government's overarching planning policy framework – would be more appropriate within Chapter 4 – Vision and Spatial Planning Objectives. The currently proposed location of this policy would, it is considered, result in the policy being overlooked or wrongly interpreted as being to do with environmental sustainability – rather than the balanced approach envisaged by the Government. Secondly, it is not considered that the plan – taken as a whole – properly reflects the positive tone and specific policies contained within the NPPF. Of particular relevance in light of our earlier representations – both written and as made at the examination – is the emphasis within the NPPF upon delivering sustainable development in rural areas. We have already remarked that the Core Strategy does not sufficiently exploit existing good levels of rail provision within parts of the District – for example by only allocating c.20 homes at Berwick Station in the south of the District. It is considered that greater policy support should be provided for development that helps to facilitate the use of sustainable modes of transport, as required by paragraph 30 of the NPPF. Also of relevance, is the recognition within paragraph 55 of the NPPF of the shared sustainability of groups or clusters of Villages, which itself draws on the conclusions of the Taylor Review, published in 2008. This is particularly

	important in a very rural District such as Wealden where a train station may serve a wider group of smaller villages that if viewed in isolation would be deemed unsustainable because of the lack of facilities offered in each location. As we have already remarked, the Core Strategy Evidence Base does tend to view rural settlements in isolation.

Signed:	

Name and Address:	Lee Scott Associate
E-Mail Address:	
If on behalf of a	The Firle Estate

company, please state:	
Date:	16 August 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 Thursday 16th August 2012**:

By post to: Head of Planning and Environmental Policy, Wealden District Council, PO Box 49, Hailsham, East Sussex, BN27 2AZ

By email to: ldf@wealden.gov.uk

Data Protection Act 1998 and Freedom of Information Act 2000
Representations cannot be treated in confidence. We are required to make copies of all representations publically 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.