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 45	
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:	These comments are made in relation to a proposed modification to the Core Strategy in relation to the NPPF presumption in favour of sustainable development and the proposed inclusion of policy WCS14. Although this policy is based on the model policy wording suggested by the Planning Inspectorate, the proposed policy is not adequate and the Core Strategy is unsound as a result. As stated within the NPPF, the presumption in favour of sustainable development is a 'golden-thread' that runs through plan making and decision taking. Whilst the proposed policy intends to promote a positive approach to the presumption, this has not been taken into account at the beginning of the plan making process and therefore it cannot be said to be truly running through the Core Strategy document. The policy has been arbitrarily added to the end of the Core Strategy within the Delivery Policies section and is not considered therefore to have due prominence and to be seen as influencing the presumption of sustainable development throughout the Core Strategy. As stated, the presumption in favour of sustainable development is intended to be a 'golden-thread' and therefore seeks to ensure that LPA's plan positively and that development that accords with policy is approved without delay. Given its importance and the manner in which the Government intend for the presumption to permeate all areas of planning, from plan-making to decision-taking, it is not sufficient merely to mention 'sustainability' in the Core Strategy. This plan for the district should therefore be more positive as a result of the presumption and embed the aim for sustainable development throughout the document and not just mention the 'sustainability' at the end of the document.

	Within the NPPF it is stated that there are three dimensions to sustainable development; economic, social and environmental, and therefore all these aspects need to be taken into account within the Core Strategy document and they should not be undertaken in isolation as they are mutually dependent. It is however considered that the Core Strategy fails to address all of these aspects of sustainable development and therefore the document does not achieve the balance between them and the presumption in favour of sustainable development does not run throughout the document as it should be. For example the NPPF states that pursuing sustainable development includes 'making it easier for jobs to be created in cities, towns and villages' however the Core Strategy makes no employment allocations for Crowborough and has proposed housing development on existing employment sites. This is considered to result in an imbalance of employment and housing and will not result in positive economic or social balance and does not result in sustainable development. Also the NPPF states that the planning system should provide the supply of housing required to meet the needs of present and future generations however the Core Strategy does not meet the housing needs of the district to its detriment whereby not enough housing will be provided in the future. This will then potentially impact on economic and social aspects which will not result in sustainable development now or in the future. Given the importance of the need for sustainable development to run throughout the Core Strategy, it is not considered that the policy that has been proposed is sufficient to make the plan sound and is therefore inadequate. The inclusion of the policy, whilst in line with the NPPF, doesn't mean that the presumption in favour of sustainable development runs through the document and does not mitigate against the need for this presumption to make a positive impact on all aspects of the Core Strategy from its beginning. It is not considered that the Core Strategy embraces the positivity towards sustainable development which is a key element of the NPPF and the future of the planning system. This opportunity to make the Core Strategy consistent with national policy is not clear throughout the document and the policy as set out is too vague and it does not say how it is to be applied locally, as per paragraph 10 of the NPPF which states that plans and decisions need to take account of local circumstances. Sustainable development runs through the NPPF and the core planning principles which it sets out and it is not considered that the Core Strategy has addressed the wider approach of the NPPF as a whole and therefore Policy WS14 is inadequate to resolve the need to have a presumption in favour of sustainable development running throughout the document.

Signed:	ASP

Name and Address:	ASP
E-Mail Address:	
If on behalf of a company, please state:	Knight Developments
Date:	16/08/12

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.