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 X (*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 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. This is reinforced by the fact that the NPPF sets out that the presumption in favour of sustainable development is the 'golden thread running through both plan-making and decision making'. As such it should provide the framework within which all other policies are considered, making it essential that it is provided upfront within the Local Plan. 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 is the failure of the Local Plan to *positively* plan to meet the housing requirements of the South East Plan, which remain part of the Development Plan. Whilst there are acknowledged ecological restraints, the Council's approach is far too precautionary in its application. This is particularly so with respect to the gap in evidence concerning the effect of increased levels of traffic on the Ashdown Forest SPA. It is considered that this evidence gap should be plugged before the Examination proceeds, rather than introducing what is effectively an embargo on any further development in this area. This does not accord with the emphasis within the NPPF on positive planning, or the wording of the proposed new policy

	on the presumption in favour of sustainable development which commits to find solutions. Any assessment as part of this process should also investigate methods of mitigating adverse impacts that maybe identified, to enable sustainable forms of development to proceed.

Signed:	

Name and Address:	Sarah Hufford Planning Consultant
E-Mail Address:	
If on behalf of a	The Lampson Family

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 x No ☐
I would wish to be notified of the adoption of the Core Strategy	Yes x 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.