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:	Policy WCS14 as introduced in the proposed mods of July 2012 reflects verbatim the model policy on the planning portal That said we do believe Policy WCS14 should be qualified by reference to Para 119 of the NPPF which states that the presumption in favour of sustainable development should not apply to sites needing appropriate assessment under the Birds or Habitats Regs. Thus we would suggest Policy WCS14 is expanded to read:- 'Where there are no policies relevant to the application or relevant policies are out of date at the time of making the decision then the Council will grant permission unless material considerations indicate otherwise – taking into account whether: • Any adverse impacts of granting permission would significantly and demonstrably outweigh the benefits, when assessed against the policies in the National Planning Policy Framework taken as a whole; or • Specific policies in that Framework indicate that development should be restricted, **The presumption in favour of sustainable development in this policy shall not apply to sites needing appropriate assessment under the Birds or Habitats Directive.**' In addition to the above, given the proposed introduction of Policy WCS14, we believe there need to be a number of consequential alterations to the text of the Proposed Core Strategy to reflect the new policy/ the NPPF. These are listed below with words to be deleted struck through and additions in bold. Para 1.5 The Core Strategy is founded upon, but does not duplicate, guidance contained within **the National Planning Policy Framework (March 2012)** ~~a series of documents provided by the Government called Planning Policy Statements and Planning Policy Guidance.~~ Para 3.2 A critical part of our approach in this Core Strategy is that the future allocation of development and growth is based upon **the presumption in favour of sustainable development, and** the attributes and constraints of settlements. Against this background, a review of Wealden's towns and a detailed assessment of its villages has been undertaken.

	Para 3.7 After careful consideration of our settlements and our growth strategy it is considered appropriate to apply countryside constraints to neighbourhood centres and other unclassified settlements. This does not necessarily mean that **sustainable** growth will not be allowed, but that it will need to reflect the character and needs of the area. Para 3.12 Each of the five towns has their own ambitions, as identified through town masterplanning exercises, and constraints to growth. The level of development and change proposed in our Core Strategy takes into account these ambitions, wider social and economic needs of the District as well as local constraints **and the presumption in favour of sustainable development**. Para 3.17 This pattern of growth seeks to meet wider housing needs and demands, and is also influenced by **the need for sustainability,** economic need, environmental considerations, infrastructure capacity and the overall balance of settlement function Para 5.8 The brownfield component of the spatial strategy is therefore likely to be ~~well~~ below ~~the national annual target of~~ 60% ~~identified in Planning Policy Statement 3.~~ However, this is an average target and in a rural area such as Wealden, where there is a limited supply of brownfield opportunities, it is inevitable that there will have to be a substantial use of **sustainable** greenfield land to meet existing and future housing needs Para 6.31 (2) supporting appropriate **and sustainable** development within the built up area contained within the development boundaries of Stone Cross and Polegate and Willingdon, which will be reviewed as part of the Site Allocation DPDs (4) encouraging appropriate **and sustainable** development which supports the range and quality of services and facilities available to its local community and improving the town centre environment and choice of shops in Polegate town centre; Para 6.45 Outside the towns and the rural settlements identified for growth development will be restricted to **that which reflects the presumption in favour of sustainable development** i.e. ~~primarily to that required to~~ **i.e. meets** an essential rural need, **supports** rural diversification and sustainability of the countryside, **promotes** tourism or **enhances** the countryside. More detailed development management policies and proposals will be contained in the Delivery and Site Allocations DPD in relation to development in the countryside. In the meantime the Council will use national policy and retained Local Plan policies to support development management decisions. Para 6.48 Development boundaries enable a clear distinction to be made between settlements (towns and villages) where certain forms of **sustainable** development may be appropriate or encouraged, and the smaller settlements and rural areas where protection of the countryside would usually take precedence

Signed:	

Name and Address:	Judith Ashton Associates
E-Mail Address:	
If on behalf of a company, please state:	Wates Developments Limited

Date:	14th 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

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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.