Chestnut Planning
architecture and town planning

MATTER 2 / OWNER OF LAND AT NINFIELD
MATTER 3 / OWNER OF LAND AT NINFIELD

WEALDEN DISTRICT (INCORPORATING PART OF THE SOUTH DOWNS NATIONAL PARK) LOCAL DEVELOPMENT FRAMEWORK

CORE STRATEGY SUBMISSION DOCUMENT EXAMINATION

WRITTEN REPRESENTATIONS ON BEHALF OF GUINNESS MAHON TRUSTEES

LAND AT NINFIELD (INGRAMS FARM)

We are instructed by Guinness Mahon Trustees as owners of Ingrams Farm at Ninfield to supplement the representations submitted by Nick Ide of Batcheller Monkhouse to address the inspector's Summary of Concerns and letter to the Council dated 31/10/2011. We are proceeding on the basis of written representations and will not be attending the hearings.

In line with the Guidance Note we have re submitting further representations only in relation to the matters where the inspectors concerns make this appropriate.

Housing Requirements

The LPA's response to the inspector's concerns sets out its explanation as to why it proposes to provide less housing than is required by the South East Plan.

The *Cala Homes* and most recently the *Stevenage* High Court cases have made it clear that it is a legal requirement that development plan documents (the Core Strategy under consideration here) must be in conformity with requirements of the relevant regional spatial strategy, in this case the South East Plan.

We would request that the table in WCS2 'Distribution of Housing Growth 2006-2030' should be amended to provide for a total provision in accordance with the South East Plan. This will require an increase in proposed dwelling numbers.

Change requested:
- Increase in total dwelling number to accord with requirements of South East Plan

Rural Areas Strategy

Removal of development boundaries at the neighbourhood centres and unclassified rural settlements is consistent with the focussing development in Service Centres, Local Service Centres and Neighbourhood Centres as identified in WCS6. We note the inspector's concern relating to the adequacy of the planning framework in settlements during the interim period. Our view is that the this should be addressed by:

- Preparing the Delivery and Site Allocations DPD quickly and efficiently so as to put a planning framework in place.
- In line with the settlement hierarchy in WCS6, providing the majority of housing in the Local Service Centres and Neighbourhood Centres, because this will support the vitality and sustainability of villages and rural settlements throughout the plan period. These settlements have development boundaries so the inspector's concern does not arise in relation to them.

In line with this, we support the identification of Ninfield as Local Service Centre in Figure 2 'Settlement Hierarchy'. This recognises the importance of the village as a local centre with a good range of local services.

We support the proposal that ,"Within Service Centres, Local Centres (excluding Stone Cross, Polegate and Willingdon and Heathfield) provision will be made for at least 455 dwellings". However the New Allocations to individual rural centres in the table is not entirely consistent with this because it provides for a total of 455. The policy should be amended to make it clear that the allocations are minimums.

Ninfield has greater capacity than neighbouring settlements to accommodate development. The SHLA shows a total figure of 424 dwellings on 4 sites, including our client's site at Ingrams Farm. Our clients land has few constraints and could be developed in a form that would add to the village in a sustainable way providing environmental benefits as well as much needed new homes. The SLHA shows its capacity as 140 dwellings.

The proposed allocation of 50 dwellings at Ninfield is unsound in view of the above. We would therefore request this should be increased to 100 dwellings so as to be in line with the allocations at Horam and Herstmonceux which are similar Local Service Centres in the southern part of the Wealden.

Changes requested:
- State that allocations are minimums
- Increase proposed allocation at Ninfield to 100 dwellings.

Nigel Hartley RIBA MRTPI
Chestnut Planning
15 December 2011