28th May 2012

Dear Mr Phillips,

I have had the opportunity to consider the comments that I have received on the implications of the National Planning Policy Framework (‘the Framework’) for the Core Strategy (CS). I note that neither the Council nor the National Park Authority (NPA) has made any comments during this consultation, although you have responded to my suggestion on the inclusion of a policy relating to the presumption in favour of sustainable development. As a result of the comments received there are matters relating to the Framework, where the national policy wording is now different, on which I would like to receive your further views:

1.) The Framework aims to boost significantly the supply of housing and to this end requires that the Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area as far as is consistent with the policies set out in the Framework. There is a need to identify and update annually a supply of deliverable sites sufficient to provide 5 years worth of housing against the requirements with an additional buffer of 5%, or 20% where there has been a record of persistent under delivery. It has been suggested in some of the further comments that the CS is not consistent with this part of the Framework. Having regard to my conclusions in my letter of 5 March 2012, do the Council/NPA have any views on this?

2.) It has been suggested that the provisions of Annex 1 of the Framework affect the weight that should be attached to Policy NRM5 of the South East Plan. What is the Council/NPA view of this?

3.) The soundness requirements in para 182 of the Framework include a new consideration – that the plan must be positively prepared. It should be based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development. To be effective the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities. A number of the responses received on the Framework refer to the CS not adopting a positive approach to necessary development and to overcoming the constraints that may prevent it coming forward. In terms of joint working on cross boundary issues, reference has been made to Wealden’s unmet housing needs overall and to the impacts of development on Ashdown Forest. Do you have any comments on the CS implications of these aspects of the Framework?

4.) Could you comment on the suggestion that the approach to economic development in CS Policies WCS3 and WCS6 does not reflect the emphasis on supporting sustainable economic growth in the Framework?
5.) Is the reference to development being excluded on “...nationally and locally designated biodiversity sites...” in CS para 3.30 consistent with Framework para 113 which requires that protection of sites should be commensurate with their status?

6.) Are there any other specific points raised by any of the comments made on the implications of the Framework for the CS that you would wish to respond to?

There are two further detailed matters that I should like you to consider. The Framework requires each local planning authority to produce a Local Plan for its area with any additional development plan documents only being used where clearly justified. It would be helpful if the Council could indicate if this has resulted in any changes to its intentions in terms of subsequent documents and, if so, whether this has any consequences for the wording in the CS. The Local Development Scheme of November 2011 shows the date of adoption of the CS as being June 2012. As this will not now be possible could you amend the Scheme in this regard?

I should be grateful for your response within 10 working days of the date of this letter.

M J Moore
Inspector