

Email from CPRE Sussex Chair to Wealden District Councillors

Subject: Wealden Local Plan - Full Council Meeting 8 February 2024

Dear Councillors,

I write as Chair of CPRE Sussex, the countryside charity. We have members, volunteers and supporters throughout Sussex and work to help promote a greener future for all the communities of Sussex and to protect and celebrate its wonderful landscapes and green places in the countryside and town.

You will be considering a draft of the Wealden Local Plan at your Full Council meeting tomorrow. CPRE Sussex is pleased to note that as things stand the new housing requirement is being set below that that would be required if the “standard method” were applied through the District.

We would urge you to consider at your meeting tomorrow whether Wealden should make a stronger case for the exceptional circumstances of the District so much of which is covered by landscapes, areas and sites of national, and in some ways international, importance. This is allowed for in the NPPF and indeed the Housing Minister, Lee Rowley, said in Parliament recently:

“The resulting update of the framework [the NPPF] builds on the Levelling-up and Regeneration Act 2023 and delivers on the intent set out by the Secretary of State for Levelling Up, Housing and Communities last year. It does so in a way that seeks to promote building the right homes in the right places with the right infrastructure, which will ensure that the environment is protected and will give local people a greater say on where, and where not, to place development.” And then added later:

“I am absolutely certain that there will be more cases for exceptional circumstances put forward in the future, and I encourage councils to consider them if they believe that they apply. Logically, I would then expect more cases for exceptional circumstances to be accepted by the Planning Inspectorate, although that will also be for the inspectorate to determine on a case-by-case basis. It is the Government’s intention to indicate that cases for exceptional circumstances can be made, that local authorities should weigh up making them and that, if they feel that they have a strong case through the Planning Inspectorate process, they do so for the good of the communities they seek to serve.”

It is clear from the Minister’s remarks in Parliament that the Government expects Council’s to make exceptional circumstances arguments based on their local landscape and needs and to do so in good faith and test these with the Planning Inspectorate. It would thus likely be wrong, for example, to fail to bring forward an exceptional circumstances argument because, say, it was thought this was counter to the NPPF - where a sole footnote example (see paras 60 and 61 of the NPPF) refers to the possible exceptional circumstances of an island. The fact that Wealden is not an island would be no basis, for example, on which to build a sound Plan especially given the wording of the NPPF and the Ministers recent remarks.

In considering the draft Plan we would ask you also to consider whether:

- a. the natural resources of Sussex can bear the increases in housing provision that might occur. This might include considering whether there are sufficient reserves of water and

the infrastructure necessary to supply and treat wastewater. These resources are already under pressure with interruptions in supply being already well documented and problems with sewage reappearing often. Too often water companies feel obliged to say they can supply and treat when the facts on the ground suggest this is not the case.

- b. policies are in place to mitigate and adapt to climate change. These might include a policy to require all new housing and industrial and commercial buildings to be built not only with charging points for EVs but also to be equipped with rooftop solar panels. CPRE research suggests that rooftop solar could supply power for some 19,000,000 homes. Measures on adaptation might include ones linked to insulation and ones that would help avoid homes overheating.
- c. there is an adequate provision of truly affordable homes that are affordable by local people. There is a real problem with affordable housing in rural areas as well as in towns.
- d. all brownfield options have been taken-up. Too often greenfields look on maps to contain nothing when in fact they provide vital ecosystem services such as storing carbon, regulating water supplies and flood risk, and, potentially, much of our food and some beverages. “Brownfield first” is an approach that helps protect these “hidden” services derived from Sussex’s exceptional natural capital.
- e. policies are in place that protect ancient woodland and other rural, urban and inter-town/village green spaces or green gaps. These areas not only provide habitats for biodiversity but provide significant benefits for the health and wellbeing of residents and visitors. Too often ancient woodlands are subject to development proposals and green gaps between settlements are likewise under pressure even though cases to preserve such gaps and such woodland have been upheld through the appeals process.

The landscapes, biodiversity and communities of Sussex are valued locally, nationally and worldwide. I hope your deliberations and decisions tomorrow will recognise that and help the future of Sussex be “greener” than it would be if business as usual principles were to dominate into the future.

Your sincerely,
Dan Osborn,
Chair CPRE Sussex

Cc’d to selected CPRE Sussex staff, trustees and volunteers

Supporting documentation:

Minister’s remarks can be found here: <https://hansard.parliament.uk/Commons/2024-01-23/debates/AD440671-52A7-4FD0-9F85-3C40B88BF776/RevisedNationalPlanningFramework?fbclid=IwAR1dFS53KGbj7yva42dVILZ3UgRJAfWPLfkT8Gg8T9T4Go-UD0mbmClTnGk>

And CPRE rooftop solar research here: <https://www.cpre.org.uk/what-we-care-about/climate-change-and-energy/renewable-energy/our-rooftop-solar-campaign/>