dha planning
& development consultants

REDROW HOMES

Examination into the Wealden District (Incorporating Part of the South Downs National Park) Core Strategy Development Plan Document

ADDITIONAL SUBMISSION: RESPONSE ON THE IMPLICATIONS OF THE DRAFT NATIONAL PLANNING POLICY FRAMEWORK

DECEMBER 2011

1 Introduction

1.1.1 This additional submission has been prepared on behalf of our clients Redrow Homes, and examines the implications of the draft National Planning Policy Framework[1] (NPPF) on Wealden District Council's Proposed Submission Core Strategy.

1.1.2 Whilst the NPPF is still in draft form, it gives a clear indication of the Government's direction in terms of future planning policy, and is therefore capable of being a material consideration. It is also expected to be adopted by the time Wealden's Core Strategy is adopted.

1.1.3 The draft NPPF has been published since our clients' previous submission in April 2011.

1.2 A New Framework for Planning

1.2.1 The principle of sustainable development permeates the draft of the new Framework, which sets the expectation that proposals should be approved promptly unless they would compromise the key sustainable development principles as set out in the draft.

1.2.2 One component of sustainable development is *'planning for people'*, which seeks the planning system to promote strong, vibrant and healthy communities by providing an increased supply of housing to meet the needs of the present and future generations.

1.2.3 The aim of Wealden's Core Strategy is to promote sustainable growth to meet their needs by balancing the ability of their environment and infrastructure to accommodate that growth. However the proposed Strategy for such growth, in particular housing, is not considered to be a flexible solution and there is no fallback position.

1.2.4 In respect of housing, the aim of the Core Strategy is to focus strategic growth in terms of broad locations rather than a more dispersed strategy of other reasonable smaller sites in and around the main settlements. There is a risk with this concentrated Strategy of putting all the 'eggs in one basket', particularly if constraints arise which mean any one of the proposed urban extensions cannot come forward.

1.3 Ensuring Viability and Deliverability

1.3.1 Paragraphs 39-43 of the NPPF seek to ensure that Local Plans should be deliverable, and in particular paragraph 43 states that *'It is equally important to ensure that there is a reasonable prospect that planned infrastructure is deliverable in a timely fashion. To facilitate this, it is important that local planning authorities understand district-wide development costs at the time Local Plans are drawn up'*.

1.3.2 Whilst the Core Strategy and Background Paper 11[2] identify the key infrastructure provision required to support the proposed growth for each of the five market towns and

[1] Draft National Planning Policy Framework, 25th July 2011, DCLG
[2] Background Paper 11: Infrastructure Delivery Plan, August 2011

key rural settlements, the details on the timescale of the works and who will be responsible for funding the works are not provided. More importantly, for the majority of the required infrastructure and planned provision there is no indication of the costs of the works, and in many cases the cost is not known (Appendix A of Background Paper 11).

1.3.3 Without knowledge of the costs involved it is not possible to assess the economic viability of the strategic development areas to meet the identified requirement for housing over the plan period, and due to this vagueness there is no certainty of actual delivery. The Core Strategy is therefore 'unsound' as it fails to comply with emerging national policy, specifically paragraph 43 of the draft framework.

1.4 Planning for Strong, Vibrant and Healthy Communities

Housing

1.4.1 The draft Framework makes it clear that Councils must be ambitious in delivering the much needed new homes that their communities need and that their local plan should meet the full demand for market and affordable housing. In this regard, Wealden's Core Strategy is not ambitious and does not meet either the market or affordable housing needs of the District.

1.4.2 In the case of Wealden's Core Strategy the evidence base suggests that the level of housing provision in the Strategy should be significantly increased. The Council's own Housing Needs Assessment[3] identifies a need totalling 812 affordable dwellings per annum over a 5 year period, and table 3 of Background Paper 2[4] forecasts the total projected growth in households from 2006 to 2030 to be 16,900. The current level of housing provision set out in Policy WCS1 is therefore significantly lower than the future housing need.

1.4.3 The Core Strategy clearly fails to accord with the explicit requirement of the NFFP that local authorities should meet identified housing needs and so fails to accord with emerging national policy.

[3] Wealden District Council Housing Needs Assessment, January 2010 (Fordham Research)
[4] Background Paper 2: Managing the Delivery of Housing, August 2011