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Wealden District Council
Planning Services
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Our ref: HALL2002
Your ref:

Dear Sirs

WEALDEN CORE STRATEGY EXAMINATION
REPRESENTATIONS FOLLOWING THE ADOPTION OF THE NATIONAL PLANNING POLICY FRAMEWORK

Following the adoption of the National Planning Policy Framework (NPPF) we welcome the opportunity to comment on the draft Core Strategy in the context of this new national planning guidance.

The NPPF leads with the presumption in favour of sustainable development and an emphasis on local decision making through a plan-led approach. In the Ministerial Foreword, Greg Clark emphasises that *'sustainable development is about positive growth – making economic, environmental and social progress for this and future generations'* Supporting this view, one of the twelve core planning principles of the document seeks to '*proactively drive and support sustainable economic development to deliver homes, business and industrial units, infrastructure and thriving local places that the country needs'*.

In this context and in accordance with advice from Greg Clark to PINS, the Core Strategy should include a new policy as follows:

> *"When considering development proposals the Council will take a positive approach that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework. It will always work proactively with applicants jointly to find solutions which mean that proposals can be approved wherever possible, and to secure development that improves the economic, social and environmental conditions in the area.*
>
> *Planning applications that accord with the policies in this Core Strategy will be approved without delay, unless material considerations indicate otherwise.*

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Where there are no policies relevant to the application or relevant policies are out of date at the time of making the decision then the Council will grant permission unless material considerations indicate otherwise – taking into account whether: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 of the National Planning Policy Framework taken as a whole; or*
- *Specific policies of the Framework indicate that development should be restricted."*

Focusing more specifically on the guidance contained within Section 6 of the NPPF, entitled *'Delivering a wide choice of high quality homes'*, this represents key advice that the Council must accord with when assessing and identifying the housing needs for the District over the plan period. The first bullet point of the first paragraph (paragraph 47) of the chapter is very important to note, advising that local planning authorities should

"use their evidence base to ensure that their Local Plan meets the fully, objectively assessed needs for market and affordable housing... including identifying key sites that are critical to the delivery of the housing strategy over the plan period."

It is clear from the evidence base as presented at the Inquiry, and the Inspector's letter dated 5 March, that the Core Strategy housing requirement target currently seeks to under-provide the level of housing required.

In his letter dated 5 March, the Inspector notes that the Council's preference is to use a housing requirement figure based on the East Sussex County Council (ESCC) variant and the midpoint between the Wealden District Council and ESCC household projections, which converts to a give a range of between 8,837 and 10,452 additional homes (2006 – 2026). The midpoint within this range is 9,644, which is still in excess of the revised upward target of 9,440 up to 2027 as recommended as a modification by the Inspector.

Moreover, the Council are clearly not able to meet the identified need for affordable housing (812 units per annum) through the proposed housing targets and the targets therefore do not accord with the general thrust of the NPPF, which seeks positive growth for future generations, or specific requirements which talk about targets based on identified need.

The second bullet point of paragraph 47 of the NPPF advises that the local planning authority should *'identify and update annually a supply of specific deliverable sites sufficient to provide five years worth of housing against their housing requirements'*. It goes on to state that a 5% buffer is also required to ensure choice and competition, and where there has been a history of under provision, this buffer should be 20%.

The Inspector's recommendation to increase the overall housing requirement figure and shorten the lifetime for this target would result in an increase in the annual requirement rate to 450 units, which is welcomed in principle and considered vital in seeking to meet identified need. However, when

reviewing the housing trajectory set out within the AMR 2010/11, it is clear that the preceding 4 years from 2006 have not met the previous annual target of 400, the first and fourth years falling significantly short. By increasing the annual housing target in line with the Inspector's recommendation, completions between 2006 and 2011 will fall further short. Indeed, it is not considered that the assumptions made in setting the housing trajectory for the next 5 years (as set out at Annex 2 of the AMR) are realistic, relying *inter alia* on increased completion rates from two sites at Hellingly Hospital and Welbury Farm to plug this significant gap.

Furthermore, based on previous completions, it is clear that the District has a history of under provision, as has been acknowledged and accepted by two inspectors following appeals at The Old Flour Mill, Upper Horsebridge (PINS Ref: APP/C1435/A/10/138255) and Honeypot Farm, Polegate (APP/C1435/A/10/2130580). It is therefore considered that the Council should identify a five year supply plus 20% to accord with the NPPF, which would mean a five year target of 2,500, or 500 per annum.

In order to meet this new requirement it is considered that the Council should remove the phased delivery of the Strategic Development Areas identified within Policy WCS4 and encourage the early delivery of many of these sites. In particular, the Land East of Hailsham and Land North of Hailsham (SD2 and SD3) should be combined as a single Strategic Development Area that would allow areas to the East to come forward as soon as available whilst not precluding immediately deliverable sites to the North to come forward to address the 5 year land supply shortfall.

Accordingly, the Council would be able to provide the additional 20% 5 year land supply buffer to ensure that the new annual housing target is met, providing choice and flexibility in the market place to meet the identified need and address the previous shortfall.

Overall, it is considered that there needs to be a step change in the delivery of housing Wealden in accordance with the general thrust of the NPPF that seeks to encourage positive growth. Leaving aside the overall housing requirement target for the period to 2027 as recommended by the Inspector, Wealden has the ability to ensure that annual delivery rates of new housing are increased, through the identified Strategic Development Areas, the suitability of which have already been assessed as part of the Core Strategy process.

In addition to these representations, we will be making further separate representations in connection with the Proposed Modifications to the Core Strategy and published by the Inspector. These representations will consider issues such as the Council's 5 Year Land Supply in more detail. It is considered that comments made in relation to the NPPF and the Proposed Modifications are intrinsically linked and should be read in conjunction with one another.

We trust the above will be fully considered by the Council and the Inspector and would be happy to discuss the content of this letter in further detail if required.

Yours sincerely

Graeme Warriner
Director

CC: