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Lynette Benton
Programme Officer
Wealden District Council
Pine Grove
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Our Ref: KLW/07/031

Date: 18th May 2012

Dear Ms Benton

WEALDEN DISTRICT COUNCIL

& THE SOUTH DOWNS NATIONAL PARK AUTHORITY

CORE STRATEGY EXAMINATION

INSPECTOR'S INVITATION TO COMMENT ON THE IMPLICATIONS OF NPPF

We represent Millwood Designer Homes Ltd (MDH), Consultee ID: 332748 and Agent ID:103948. MDH have a controlling interest in two parcels of land to the southwest of Crowborough which is within SD10.

The NPPF has made a number of important changes which now need to be considered.

Paragraph 47 of NPPF explains how the housing land supply should be provided and states that additional buffers of between 5% and 20% housing must be brought forward from latter plan years depending on the evidence of housing delivery. As a consequence the housing trajectory on page 30 of the Core Strategy needs to be revised to take on board the 'front loading' of housing. In our original evidence on matter 3F we explained that historically Wealden District Council had consistently under provided in terms of its annual housing delivery. On that basis, the Core Strategy should be updated to emphasise that 20% front loading of housing should occur. The increase in housing delivery in the early years should happen as a matter of urgency and the ability of the SD10 area to deliver housing should be identified as a way in which this front loading of housing should occur. The Council's proposed embargo on new development until, in some cases, 2015 is contrary to this policy.

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The Core Strategy needs to include guidance to deal with situations where this 20% front loading is not being delivered. Clearly, it is not in the wider communities interests for the local authority to fall back into its habit of low housing delivery and there must be clear advice to developers on when they should make applications. Applications should not solely be contingent on local authority endeavours to provide alternative green spaces, which are likely to take valuable time in conflict with the aims of NPPF. The role of on site provision or a contribution mechanism which was discussed at the Examination is therefore very important and should be identified as a mechanism to allow early housing delivery.

The Core Strategy indicates that windfalls were not considered in the calculation of housing provision, but the Council notes that they "will count towards the overall house building totals achieved in Wealden." Paragraph 48 of NPPF says that in exceptional circumstances windfalls can be considered but specifically excludes the contribution from garden redevelopment. Since a proportion of the windfall development has historically come from garden sources it is important that future calculations are based on previously developed land redevelopment only.

Yours sincerely

Martin Hull MRTPI
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