Wealden District (Incorporating part of the South Downs National Park) Representation on the Proposed Modifications to the Core Strategy

Wealden District Council

Working in Partnership

South Downs National Park Authority

This response relates to the proposed modification	
MM 22	**WS**
(Please add numeric reference e.g. MM22 or Wealden District Council/ South Downs National Park Authority modification WS e.g. WS 23)	

Declaration:	I consider the proposed modification will assist the submitted Core Strategy to be found sound ☐ /unsound ☒ (*place a cross in the box to show which option you have chosen) for the following reasons:

Reasons Given:	While this modification (and MM4) provides for a level of housing growth closer to the South East Plan target, it is considered that there should be a recognition of the contribution of windfall sites to the overall supply when both considering and presenting housing figures. This is because the anticipated contribution of windfall sites is significant and, in conjunction with the planned level of allocations, will mean that the actual level of house-building is likely to approximate to that of the South East Plan. The basis of this ascertion draws on the Council's published background paper "Managing the delivery of housing". The contribution of development on windfall sites is acknowledged paragraph 6 of this paper. It states that "in addition to land allocated for housing development throught the development plan, some development will come forward on windfall sites". It adds that "the average number of residential units completed on windfall sites over the 10 years is 211 per annum." This is equivalent to nearly a half (47%) of the proposed house-building rate of 450 per annum and over twice the shortfall between this and the South East Plan annual requirement of 550 pa. Not unreasonably, the background paper allows for a somewhat lower rate of completions on windfall sites in the future. Paragraph 10.8 states "for the purposes of estimating the total number of dwellings which may come forward from this source, it is assumed that the annual rate of development on windfall sites may fall to approximately 150 per annum as a result of changes to PPS3" On this basis, with the combination of 450 dwellings per annum from existing permitted sites and new allocations together with the 150 dwellings per annum from windfalls, there would be a total of 600 dwellings per annum being built - which is in excess of the South East Plan requirement. It is not clear whether the reduced windfall allowance takes account of the NPPF's exclusion of development on garden land. Even if this is not the case, the figures in Appendix 10 of the background paper for new housing commitments on garden land in 2008/9 and 2009/10 (101 dwellings), when compared to the total number of dwellings build on windfall sites in the same years (422) in Appendix 11, suggest that these only make up only a small proportion (approximately a quarter) of total windfall developments.* This will still mean that the South East Plan target would, in practice, likely be reached. * It is appreciated that the figures for approvals and completetions are not directly comparable but, for records for the adjoining Rother district over 5 years from 2006 -2011 show that 21% of windfall site housing completions were on garden land, which is consistent with the above estimate. In view of this, it is requested that the Inspector gives express consideration in his final report to the contribution that windfall sites will make towards overall housing supply and towards the South East Plan target. Also, it is submitted that paragraph 514 be amended by the addition of further text to the effect that the trajectory does not include allowance for anticipated windfall site developments, which would be in addition to the proposed development provisions in this plan and would contribute towards meeting assessed need.

	NB This representation should be read in conjunction with the duly submitted representation on the implications of the NPPF on the Wealden Core Strategy.

If this is a new matter that you have raised please complete the following

I wish ☐ / do not wish ☒ (*place a cross in the box to show which option you have chosen) for this matter to be heard in front of the Inspector

Signed:	
Name and Address:	David Marlow Planning Strategy and Environment Manager Rother District Council

E-Mail Address:	
If on behalf of a company, please state:	Rother District Council
Date:	13 June 2012

Please place a cross in the box to show which option you have chosen	
I would wish to be notified of the publication of the recommendations of any person appointed to carry out an independent examination of the Core Strategy	Yes ☒ No ☐
I would wish to be notified of the adoption of the Core Strategy	Yes ☒ No ☐

Note: If completing this in hardcopy form, please use additional sheets if necessary.

Please return this form by **5pm on Wednesday 13th June 2012**:

By post to: Head of Planning and Environmental Policy, Wealden District Council, Freepost SEA 10959, Crowborough, East Sussex, TN6 1BR

By email to: ldf@wealden.gov.uk

Data Protection Act 1998 and Freedom of Information Act 2000
Representations cannot be treated in confidence. Regulation 30 of the Town and Country Planning (Local Development) (England) Regulations 2004, as amended, requires copies of all representations to be made publicly available. The Council will also provide names and associated representations on its website but will not publish personal information such as telephone numbers, e-mails or private addresses. By submitting a representation on the Proposed Modifications you confirm that you agree to this and accept responsibility for your comments.

Please telephone 01892 602007 or e-mail ldf@wealden.gov.uk if you require assistance in submitting your representation or if further information is required. If you, or somebody you know, would like the information (guidance notes, forms etc) in large print, braille, audio tape/CD or in another language please let us know.