**Wealden District (incorporating part of the South Downs National Parks) Local Development Framework**

**Core Strategy DPD**

**Examination**

**Further Statement**

**MATTER NO: 3**

**Housing**
**CS Policies WCS 1, 2 & 5**

| | | |
|---|---|---|
| **A.** | **What part of the CS is unsound?** | **WCS1 and 2** |
| **B.** | **Which of the criterion is failed?** | **Justified** |
| **C.** | **Why it fails?** | |

**Scale and Distribution of Housing/General Conformity with the SEP (3a)**

As indicated in the note entitled "Exploratory Meeting – Summary of Inspectors Concerns", DPD's must be in general conformity with the relevant regional strategy.

WDC has argued that the CS is in general conformity with the SEP including Policy H1 Housing and NRM 5 Conservation & Improvement of Bio-diversity.

The word "general" provides for some flexibility in interpretation. The Core Strategy does not provide the quantity of housing development set in the Regional Plan. The Regional Plan did not for example provide for a range of housing development under Policy H1. Policy H1 is clear when it states that local planning authorities will

- Allocate sufficient land and facilitate the delivery of 654,000 net additional dwellings …

- Work collaboratively to facilitate the delivery of additional dwellings in sub-regions and the rest of the sub-regional areas and,
- Prepare plans to ensure the delivery of additional dwellings

WDC in its 3 October 2011 letter of reply to the Inspector's concerns sets out, in effect, why it did not strictly conform with SEP Policy H1, and that it must therefore rely upon NRM 5. The question as to whether the Core Strategy is in general conformity with the regional strategy cannot be answered in the abstract. It would appear to turn upon the issue identified in the exploratory meeting, ie. whether WDC has in fact made provision up to the level closest to its original allocation (Policy NRM 5 iii, P.91, SEP refers), and the extent to which development is capped to the south by infrastructure capacity.

**Housing Levels Post SEP (3b)**

SEP Policy H2 deals with managing the delivery of the regional housing provisions.

One question is whether the present economic climate jeopardises the housing strategy overall – with the downturn in house building, is it unrealistic to expect the regional strategy to be achieved?

Our view is that it is too early to say. The South East Plan period extends up to 2026 and we do not believe the circumstances are such that there should be a fundamental departure from it.

**CS Provision versus Housing Need (3c)**

As we comment elsewhere under Matter 2, WDC presents a range of projection data in its 2 December 2011 dated letter to the Inspector. It calculates housing requirements based upon forecasts of district trends and a County Council migration led variant. WDC discounts 2008 based ONS/CLG projections as being least likely to reflect local circumstances. Clearly, different permutations of projections will generate a higher or lower housing requirement. We believe the council's approach produces a conservative estimate of the future housing requirements. Notwithstanding this, the calculations

produced by the council reveal a significant short fall within the rest of the Wealden area over the planned period. The council seeks to deal with this by stating that :-

- The needs of the northern part of the district must be seen in the context of it having a buoyant housing market, high land values and with high out commuting
- Many properties are situated in villages and hamlets dispersed across the countryside
- The impact of new housing will be less in the north as people tend not to work and shop in the area.

From this the council concludes that under provision in north Wealden will have a negligible impact within the south.

We contend that the fact remains that WDC will not be meeting housing requirements up to 2030 overall or within the north of Wealden.

**Distribution by Settlement (3d)**

WDC has produced an infrastructure etc constrained housing distribution reflecting the Ashdown Forest zone of influence and the Pevensey Levels catchment levels (Scenario C).

We argue elsewhere (under Matter 2) that settlements outside these areas could be identified under WCS6 for further development thus providing an opportunity to address the housing shortfall, as a variant to Scenario C.

**Alternatives to Distribution & Location of Development (3e)**

As under Matter 2 and above.

**Housing Supply/PDL (3f, g & h)**

Comments to be made during discussion as appropriate.

## D/E. How the CS can be made sound/precise changes sought

As under Matter 2