Matter 3/ Housing
Knight Developments
Mr and Mrs Colliver
The Clay Family
Starglade Healthcare
Mr Houlton
Hope Way Ltd
Evergreen Ltd

Matter 3: Housing (WCS1, WCS2, WCS5)

a) Does the overall scale and distribution of housing provision accord with the requirements of the South East Plan (SEP) having regard to policies relating to infrastructure and the environment as well as those for housing? Is the Core Strategy in general conformity with the SEP in this regard?

1. It is not considered that the overall scale and distribution of housing provision is in general conformity with the SEP. The representations which were submitted to the Proposed Submission Core Strategy document in April 2011 are still entirely relevant and it is requested that these detailed comments are taken into account in discussing this matter. In summary:

    - The justification for the reduction in housing figures does not take into account the SEP period of 2006-2026 and the relative deficit as a result of direct comparison.
    - The direct comparison housing figure provided by the SEP is 13,200 additional dwellings (550 per annum) over the Core Strategy plan period of 2006-2030. The Core Strategy will only produce 400 in comparison.
    - The Core Strategy does not acknowledge the deficit or the current circumstances which confirms that all plans which are examined must be in accordance with the SEP.
    - Trend based and policy based population projections clearly demonstrate the housing need in the district which has not been adequately acknowledged within the Core Strategy, both in respect of market and affordable housing.

2. The SEP acknowledges that there are two parts of Wealden and allocates housing accordingly. The council's Strategic Housing Market Assessments (2007) also acknowledge that there are two quite different housing market areas in the district, therefore assessing North Wealden and South Wealden and Eastbourne as two separate areas. The SEP designates specific policies to the Sussex Coast Sub-Region as this is identified as an area which would benefit from strategic

economic growth and regeneration of the coast. South Wealden is included within this sub-region and this is allocated 7000 dwellings over the SEP period.

3. The SEP has taken into account potential district based issues which may arise out of the housing provision in the sub-region, and thus have allowed flexibility and alternatives to be considered on a local level, this set out in Policy SCT5, including environmental and infrastructure constraints. Likewise the Core Strategy acknowledges the need for economic growth and regeneration of South Wealden, whilst not specifically referring to the SEP aims of achieving a successful growth region on the Sussex Coast.

b) Is there evidence since the SEP was adopted that would support a different level of housing provision in the Core Strategy from that in the SEP?

4. The SEP is the relevant policy document and evidence base for housing provision within Wealden. There is no subsequent or alternative evidence base in which to alter the approach to housing taken by the SEP. It is important point that the SEP would have taken account of local factors in its allocation for Wealden and allows such flexibility and allowances to provide this. The SEP was produced around the time as the Wealden Core Strategy was being developed and therefore the very issues and circumstances would have been apparent to the Council when the Core Strategy was being prepared. The Core Strategy therefore must relate to the SEP which is still the relevant policy and which contains the most up to date evidence base.

5. Since the announcement of the revocation of Regional Spatial Strategies and the LDF Sub-Committee meeting (7th July 2010) it is not considered that an appropriate evidence base could have been put together to accompany a dramatically reduced housing figure in the timeframe from July 2010 to the submission of the Core Strategy in August 2011, particularly as the council's evidence base accompanying the Core Strategy up until July 2010 had been based on accommodating SEP provision for housing which had begun prior to 2007, a period of over 4 years.

c) How does the overall level of housing provision in the Core Strategy relate to the need for both market and affordable housing in the district?

6. In relation to housing need, the forecast change is 16,900 additional households by the end of the plan period (BP2, paragraph 7.1) with the Wealden SHMA (2007) predicting a need of around 1200 affordable dwellings per annum (p.31). In addition to this a large proportion of affordable housing is required with a current total of 2161 households in need (BP2, Appendix 1). The Housing Needs Assessment (2010) states an annual affordable housing need of 812 per year (Housing Needs Assessment, S13). Although this issue was discussed at the Exploratory Meeting and addressed in the Inspector's letter (31st October 2011), no robust analysis of affordable housing need, or provision within the Core Strategy has been clearly explained. The need is clearly high, for example in Crowborough, the various areas of need are not covered by the growth planned by the Core Strategy as there are 302 households in need (BP2, paragraph 8.23) currently but the housing figures only propose 300 dwellings overall over the plan period.

d) Has the distribution of housing between the different types of settlement been justified by the evidence base and does it accord with national and regional policy?

7. The distribution of housing between the different types of settlement has not been appropriately justified by the evidence base. There is no cohesion between the development of the Spatial Development Options (2009) and the Scenarios regarding spatial distribution (SA, paragraph 8.40) of housing. In respect of North Wealden, Crowborough appears to have been discounted due to the Ashdown Forest SPA without proper investigation to whether development could be undertaken without detriment to the SPA. As BP2 demonstrates on Page 22, Crowborough has a current need for 302 new affordable households more than Uckfield (288, BP2, p.21) which undermines the council's aim for sustainable growth of the town. The council has recognised the restraints posed to Crowborough by way of its employment restriction but no additional employment has been proposed and the proposed SD8 and SD9, both existing employment sites,

will only increase this deficit. Paragraph 8.13 of the SA, confirms the Core Strategy (Scenario C) is based on areas of need with local aspirations which would suggest the Strategy is based on these aspirations rather than a robust evidence base.

8. The household projections for North Wealden increase by 8300 up to 2026 and 5800 in South Wealden (Strategic Housing Market Assessment of Wealden, 2007, figure 5). North Wealden produced the most significant number of new jobs, which rose on average by 460 per annum (paragraph 1.27). The report concludes that the most likely scenario for North Wealden is that jobs will continue to grow, enabled by increases in activity rates of the working age and growth in activity rates among retirement age people, with scope for reduction in net out-commuting. The impact of Uckfield on the environmental policies does not appear to have been considered especially as the traffic and visitor impacts on the SPA appear will be more significant than more strategically sited development. It would be more appropriate to reallocate further development to Crowborough from Uckfield due to the increased commuting from Uckfield to Crowborough and East Grinstead whereas Crowborough commutes northwards away from Forest (Wealden SHMA, figures 1-2).

e) Have reasonable alternatives to the distribution and location of housing development been considered? Has it been demonstrated that there are no reasonable options that would avoid the infrastructure and environmental constraints identified in the Core Strategy?

9. The basis of allocating land for development in the district appears to stem from the eight options proposed within the Issues and Options (2007) and Strategic Development Options (2009) documentation leading to the preparation of the Core Strategy. Although a number of the options proposed in the Strategic Development Options were selected for further analysis this approach appears to have been superseded by three spatial distribution options which focus solely on housing figures and broad distribution of the towns (Sustainability Appraisal (SA), p.64). This approach was adopted in the period following 2009 where the Local Development Framework Sub

Committee considered the consultation responses (Background Paper 1: Development of the Proposed Submission Core Strategy (BP1)) and the correlation between the options and the methodology in reaching them is unclear.

10. The first two options considered in the preferred spatial strategy for the district centred upon the distribution of housing proposed in the South East Plan Regional Spatial Strategy (SEP). Scenario A considers accommodating 7000 dwellings in the Sussex Coast Sub-Region (South Wealden) and 4000 dwellings in the rest of the district (North Wealden) in direct compliance with the SEP proposals (over the period 2006-2026). Scenario B addresses concerns regarding infrastructure and waste water constraints in South Wealden and instead directs a further 1000 dwellings to North Wealden to address the inability of South Wealden to accommodate the SEP target for the Sussex Coast Sub-Region. Both scenarios and the evidence base for the preparation of the Core Strategy are based on the 11,000 dwellings proposed in the SEP.

11. This figure was not considered unfeasible in the development of the Core Strategy as the options proposed at all stages recognised the constraints but established alternative options in order to accommodate 11,000 dwellings which have been robustly assessed within the SEP for addressing housing need and demand in the district. The constraints within the district were fully recognised as part of the development of the SEP and as the council's figures show (letter of 2nd December, Table 3), housing need is far greater than even the SEP proposals. Thus, the annual provision of 550 dwellings is considered the minimum the district should accommodate.

12. The Sub Committee Report (7th July 2010) focused on the announcement of the government to revoke Regional Spatial Strategies and why it would be appropriate to defer the consideration of the Core Strategy. Subsequently Scenario C was introduced, selected and proceeded with in the final stages of preparing the Core Strategy without any clear justification. It is not considered there has not been appropriate justification for reducing housing figures, particularly as a Scenario B had already been prepared to consider the impacts of potential constraints in South Wealden. The Sustainability Appraisal referred to significant infrastructure and environment constraints for the justification for developing Scenario C.

13. However since the LDF Sub Committee meeting and the Government intention to revoke Regional Spatial Strategies with immediate effect, the proposed number of dwellings was reduced to 9,600 without, it would appear, calculated reasoning for this reduction and the methodology for reaching the figure.

14. The Infrastructure Development Plan and the Habitats Regulation Assessment (HRA) documentation which accompany the Core Strategy are both prepared on the basis of accommodating a 9,600 (400 dwellings pa) target over the 2006-2030 plan period. The evidence base for testing the 11,000 dwellings (or rather 13,200 over the same plan period) in relation to these infrastructure and environmental constraints is not available or was not developed at this time. The above studies only demonstrate a methodology based on 9,600 dwellings and have not at any time provided any explanation into the potential infrastructure problems and the ways these could be managed, i.e. higher levels of development.

15. The methodology of selecting Scenario C appears to be explained on pages 92-93 of the Sustainability Appraisal. However this is a simplistic approach and the following documentation to robustly assess the Scenario and associated housing numbers, namely the IDP and the HRA, has not been used to test other options or higher levels of development. It is considered this would have been the most appropriate and clear process in order to test the minimum housing numbers required to meet local need, against the constraints in the district.

16. It is thus not considered that reasonable alternatives have been appropriately assessed within the development of the Core Strategy with regard to distribution and location of housing development as there is no evidence base to substantiate either Scenario A or B, or the methodology of reaching Scenario C. The environmental and infrastructure constraints have therefore not been adequately assessed in relation to the SEP housing figures and the evidence base in relation to these does not assess a range of options and a clear methodology for reaching the most appropriate solution.

f) Does the Core Strategy assist in providing a continuous supply of deliverable sites so that the housing requirements of the next 5 years can be delivered?

17. The figures in the Housing Trajectory contained on page 30 of the Core Strategy indicate that over the next five years (2011-12 to 2015-16) housing supply is likely to equate to approximately 2,930 dwellings (586 per annum). This would potentially meet the council's five year supply, however it solely relies on existing sites with planning permission rather than the those strategic development areas as part of the strategy which are not due to come forward until 2015. Furthermore, there is no evidence these extant permissions will come forward and that they can support this delayed commencement of the strategy and therefore highlights the uncertainty of the plan meeting the housing supply over the first five years. More significantly, the peak in the next five years is used to justify meeting less than the council's aim of 400 dwellings per annum in future years, and this is not considered an appropriate way of addressing housing supply due this uncertainty of potentially expired planning permissions.

g) Is the Core Strategy likely to result in an adequate supply of developable sites in the plan period beyond 5 years?

18. On the basis of the detailed comments made on housing figures overall, it is not considered that the council can meet provide a continuous supply of deliverable sites over five years. If the SEP was appropriately adhered to, the total supply figure from 2006-2030 would be 13,200 dwellings delivered at an annual rate of 550. The council's justification for a five year supply relies only on the 400 dwellings per annum figure proposed (9,600 over the plan period).

19. The council's Annual Monitoring Report (AMR, 2009-2010) and the housing trajectory and anticipated phasing of development (Core Strategy, p.30-31) assess the delivery of a five year supply in the district. The development of housing sites is predicted to peak between 2013-2015 due to the a large number of sites allocated in the Non-Statutory Local Plan coming forward after the housing market recession in 2008 (AMR, p.16). It is anticipated that after 2015 the aim is to

phase delivery of sites allocated in the Core Strategy and this will contribute to the five year supply. However, the projected annual delivery rate in 2015-2016 is 352 dwellings per annum. The council anticipate that after this date, the projected annual delivery figure will be approximately 350 units per annum. The aim within the Core Strategy housing figures is 400 dwellings per annum and the shortfall is justified by approximately 700 units coming forward in the peak years of 2013-2015 (AMR, p.18).

20. This justification is not considered sufficient as the aim of a rolling five year supply is to enable the council to remain adaptable in respect of housing markets and encourage choice to address housing need (PPS3, paragraph 60).

h) Is there an adequate strategy for bringing previously developed land into housing use? Should there is a local previously developed land trajectory? Is the Core Strategy sufficiently clear about an overall target for the proportion of new housing on previously developed land and should this be included in a policy?

21. Although where possible brownfield land should be utilised for redevelopment but not at the expense of employment land which can help support the future growth of the town. Allocations SD8 and SD9 are contrary to this approach. This flexible approach should form part of the overall housing strategy.

Conclusion

22. It is not considered the strategy is sound on the basis of non-compliance with the SEP housing figures. The SEP allowed for flexibility within the district as a whole to accommodate the 11,000 dwellings proposed over the period 2006-2026, and the council have ignored this in the preparation of Scenario C. Furthermore, higher levels of housing have not been tested in relation to the environmental or infrastructure constraints and therefore the number to be delivered has not been justified.

23. The distribution of development does not follow the identified need within the District and therefore this failure to address this need also contributes to the unsound nature of the plan. Therefore the plan is not justified in relation to the evidence base, nor has it been effectively tested against other alternatives (higher levels of growth against the environment constraints) and therefore it will not be effective in meeting the needs of the District. Due to the nature of the lack of its recognition of the infrastructure and environmental in its approach, the plan will also not be deliverable. In light of these factors the plan is not compliant with national policy.

24. The plan should be revised to take account of the required housing numbers and effectively tested against the HRA and the IDP.