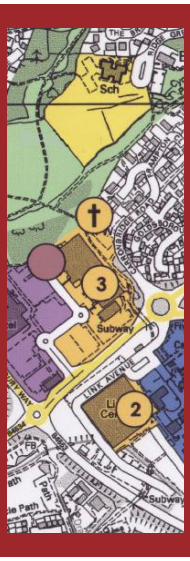
Boyer PLANNING

Gallagher Estates / Heron Land / Persimmon Homes – Matter 3 - 107752







Wealden Core Strategy

Main Matter 3: Housing

Submitted on behalf of Gallagher Estates Ltd,
Heron Land Developments and Persimmon Homes South East

December 2011

10.160

Crowthorne House, Nine Mile Ride,
Wokingham, Berkshire RG40 3GZ

T 01344 753 220
F 01344 753 221

enquiries@boyerplanning.co.uk
www.boyerplanning.co.uk

CONTENTS

	Page No.
SECTION ONE – INTRODUCTION	**1**
SECTION TWO – MATTERS TO BE EXAMINED	**2**
SECTION THREE – RECOMMENDED CHANGES	**14**

SECTION ONE – INTRODUCTION

1.1 These representations have been prepared by Boyer Planning Limited on behalf of our clients, Gallagher Estates Ltd, Heron Land Developments and Persimmon Homes South East, in relation to the Matter 3: Housing of the Wealden Core Strategy Examination, to be held on 18th January 2012.

1.2 Our clients have submitted representations in respect of the Proposed Submission Core Strategy and have now instructed us to represent them through participation in the Examination process and the submission of representations upon relevant matters.

1.3 Our representations to the Core Strategy are directly relevant to the list of matters to be examined, and this statement specifically addresses the questions that have been raised that are relevant in the context of our representations along with applying these to the tests of soundness as most recently amended within PPS12.

1.4 On behalf of our client we are also submitting representations in respect of Matter 1: Spatial Strategy and Matter 6: Uckfield Area Strategy.

1.5 In respect of the Tests of Soundness, we consider that, whilst the broad locational strategy of the Core Strategy is sound, some significant amendments should be made in respect of specific policies to improve the soundness and clarity of the document. We expand upon these points in our response to the various questions which have been raised by the Inspector. In particular we recommend the increasing of the housing target and consider that SD1 is not a sound proposal and that it should only be included as an allocation with a substantial reduction in the number of dwellings to a figure that reflects certainty of the deliverability of that number. In turn we consider that there are alternative sites, and in particular our clients' land at Bird in Eye South, that should be included as a strategic allocation.

1.6 We set out our response to the questions in Section Two. Our comments have regard to national planning guidance and other material considerations.

SECTION TWO – MATTERS TO BE EXAMINED

2.1 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?

2.1.1 No. The South East Plan set a housing target equivalent to 550 dwellings per annum (dpa) for the District. Policy *WCS1 Provision of Homes and Jobs 2006-2030* sets out the Council's target in relation to the provision of net additional dwellings and employment floorspace over the plan period. Policy WCS1 proposes a provision of 9,600 dwellings in Wealden District over the period 2006 -2030, equivalent to 400 dwellings per annum (dpa). The Council's proposed target is therefore significantly below that established through the South East Plan. The Council's target represents a locally-derived target which is explained in para. 3.11 of the Consultation document to be based on estimates of capacity and community aspirations.

2.1.2 In setting its housing target the South East Plan took account of local infrastructure and environmental needs and constraints. It is not considered that the proposed reduction in the housing target is in accordance with the requirements of the South East Plan in these regards.

2.1.3 Although further justification for the target has been provided by the Council in response to the Inspector's questions following the Exploratory Meeting we do not consider that this is sufficient to justify the lowering of the housing target from that included in the South East Plan. We expand on our reasoning for this stance in section 2.2.

2.2 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?

2.2.1 No. Although some of the evidence which supported the SEP has been revised since its adoption it is not considered that this is sufficient to warrant the change in target proposed by the Council. Indeed the SEP itself recognised that the housing



targets included in it were likely to require increases as part of its review. Para. 7.7 of the SEP notes that ***'the review of the RSS will examine the current levels of housing and a rate of provision higher than 32,700 dwellings per annum is likely to be required to meet the strategic needs in the region.'***

2.2.2 We recognise that it is the intention of Government policy that Local Authorities should decide their own housing targets. It remains important however for such targets to be justified by robust evidence as was emphasised in the CLG Guidance dated 6th July 2010 (pursuant to the proposed abolition of RS). PPS3 identifies the range of considerations that need to be taken into account in determining the appropriate level of housing at Local Authority level. Para. 33 states:

> ***'Regard should be had to evidence including Strategic Housing Market Assessments, the latest Household Projections, Strategic Housing Land Availability Assessments, affordability and the impact on infrastructure.'***

2.2.3 Whilst PPS3 is set to be removed and replaced by the National Planning Policy Framework (NPPF) in due course, the NPPF also emphasises the need to set an appropriate and justified housing target. Para. 109 of the NPPF states that Local Planning Authorities should:

> ***'use an evidence-base to ensure that their Local Plan meets the full requirements for market and affordable housing in the housing market area, including identifying key sites which are critical to the delivery of the housing strategy over the plan period.'***

The draft NPPF also states the following, at para 109:-

> ***'Identify and maintain a rolling supply of specific deliverable sites sufficient to provide five years' worth of housing against their housing requirements. The supply should include an additional allowance of at least 20% to ensure choice and competition in the market for land.'***

The requirement for additional housing of at least 20% is a further reason for the Council to increase its housing figure for the District.

2.2.4 As highlighted above the South East Plan set a housing target of 550dpa over the plan period. This target was based on the 2004 Sub National Household Projections which have since been updated as follows.

Sub National Household Projections	Wealden Household Growth 2006-2026	Wealden Household Growth 2006-2030**
2004 Base	+14,000	N/A
2006 Base	+14,000	N/A
2008 Base	+12,000	+15,000

** Interpolation of 2028 and 2033 projections

2.2.5 It can be seen that whilst the latest projections imply a slightly lower level of household generation than at the time the South East Plan was issued, the projection is still substantially above the housing provision included in the South East Plan, and therefore even higher than that proposed in Policy WCS1.

2.2.6 The Council's response to the Inspector's questions highlights that:-

> ***'the South East Plan distributed housing requirements in relation to a number of factors, including environmental and other constraints (including infrastructure) as well as economic factors. In the context of Wealden District, the South East Plan makes it clear that the Sussex Coast Sub Region addresses its own need and helps wider regional demand, and matches development requirements with the scope and limitations imposed by the physical environment.'***

2.2.7 We consider that the factors identified for consideration through the South East Plan process remain of relevance in the setting of a local housing target for Wealden. It is unclear how the Council considers such a statement to help justify the reduction in the housing target for the District. The South East Plan considered both local and wider regional housing needs and set these against constraints to development such as environmental designations. On balance the South East Plan concluded that the District could support an additional 550dpa. This in itself was below the level of need identified in the Sub National Household Projections for the District but considered factors other than housing need.

2.2.8 The Council's SHLAA, published in March 2010, identifies land for 21,646 dwellings over the plan period, significantly over the South East Plan target of 11,000 dwellings. The reduction in housing target cannot therefore be justified on a lack of housing land availability and the presence of constraints on delivery as a result of environmental or other designations. We therefore turn to the level of housing

demand for the District in our consideration of the Council's justification for the reduction in the housing target.

2.2.9 The Council's response to the Inspector's questions considers a variety of demographic projections which are considered in turn below:

- ONS Projection (2004) = 14,100
- ONS Projection (2008) = 12,218
- East Sussex County Council (ESCC) migration led variant = 11,543
- Wealden District extrapolation based on previous trends = 8,312
- ESCC zero net migration = 2,691

2.2.10 The Council's proposed target is based on the mid-point between the ESCC migration led variant and the Wealden District extrapolation based on previous trends. We do not consider that this is the appropriate approach to base the target on. Three of the five targets support a target higher than that proposed by the Council through the Core Strategy. Of the remaining two targets one is based on zero net migration which is widely acknowledged to be an unsustainable basis on which to plan household growth. The other merely projects previous trends without conducting an appropriate assessment of the future needs of the District set against likely constraints. To calculate its housing target the Council has averaged its favoured two projections; using the same principle with the four most appropriate projections provides an average target of approximately 11,500 dwellings over the period to 2026.

2.2.11 In direct contrast to the Council's assessment we therefore consider that there is no basis on which to support a lowered housing target. The Council has not provided any robust evidence as to why a higher figure should not be proposed. Accordingly we submit that Policy WCS1 is unsound and that a housing provision of at least 550 dpa (13,200 over the period 2006 – 2030) should be proposed.

2.3 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?

2.3.1 As discussed above we consider the overall level of housing provision in the Core Strategy to be too low to meet the needs of the District. Our comments above primarily consider the need for market housing in the District. This will of course

have associated implications for the supply of affordable housing in the District particularly as a result of Policy WCS8 which sets the threshold and requirement for affordable housing on sites.

2.3.2 Appendix B to the Council's response to the Inspector's questions sets out the Council's position in relation to affordable housing need. The Council's Housing Needs Survey (2009) identifies a housing need of 812 dwellings per year. This is substantially above even the overall housing target proposed by the Council and therefore exceeds the level of affordable housing likely to be provided. Policy WCS8 of the Core Strategy sets a requirement of 35% affordable housing on site of 5 or more dwellings (net) or on sites of 0.2 hectares or more. At best the policy will provide 3360 dwellings, sufficient to meet only 4.12 years of the identified affordable housing need. Although it must be recognised that the policy does highlight the potential for higher level requirements for the sites identified through Site Allocations DPDs it is not considered that this is likely to overcome the anticipated shortfall in affordable housing supply.

2.3.3 The Council's Statement of Affordable Housing Need seeks to justify this shortfall by highlighting that the 812 unit per year housing need *'does not equate to the need to build 812 new affordable homes per year.'* We acknowledge and support the spirit of this statement and recognise that alternative methods to meeting housing need can make a significant contribution. The extent of the Council's reliance on such alternative methods is however questioned and whether this can truly meet the level of need the Council anticipate. As such we consider that a housing target of at least 550 dpa with its associated increase in supply of affordable housing will be more appropriate than that currently being proposed in order to meet the need for market and affordable housing.

2.4 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?

2.4.1 As previously advised in our response to the Core Strategy pre-submission consultation and in our response to Matter 1 of the hearing sessions of the Examination, we support the proposed broad distribution of housing growth across

the District. The approach proposed is felt to be legally compliant and sound. The policy will see the focus of development at the main settlements whilst ensuring the smaller settlements receive sufficient development to be sustainable.

2.4.2 It is considered that the identification of Uckfield as a District Centre and the associated level of housing proposed for the settlement is appropriate. The settlement meets the requirements of the classification being an accessible settlement by road and public transport containing a range of shops, employment opportunities and facilities including secondary school. As such it is considered that the settlement is an appropriate location for development in the District due to its sustainability credentials. Although District Centre is not the highest classification of settlement overall, it is the highest type found within Wealden District. Consequently Uckfield is identified as forming one of the main three settlements located within the District.

2.4.3 The South East Plan identified Uckfield as having an important role to play in the District and this is supported by the Council's chosen spatial strategy. On the role of Uckfield, the South East Plan states:-

> ***'The town of Uckfield will continue to play an important role as a market town in supporting its wider hinterland. Given its accessibility by rail and road and its potential to address constraints, it is expected that the town will help meet wider housing needs through provision of new housing.'***

2.4.4 It is considered that the emphasis of the role of Uckfield supports the Council's strategy. We would however highlight the importance of setting an appropriate housing target in ensuring Uckfield can achieve this objective.

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

2.5.1 As discussed above, we are in general support of the distribution and location of housing development across the District. Potential alternative distributions of future housing development across the District have been the subject of previous Core

Strategy consultations. This has enabled the Council to reach an appropriate conclusion on the most suitable distribution for the District.

2.5.2 The Sustainability Appraisal Report which accompanies the Core Strategy does identify the following infrastructure and environmental constraints to the proposed strategy:

- ***'The additional recreational pressure on the Ashdown Forest possibly created by new residents in the vicinity will require some form of mitigation.***
- ***A key supplementary policy to the development strategy would need to include a substantial contribution to improving walking and cycling facilities and improving connectivity by bus between Polegate and Hailsham, and between rural areas and the main towns both within and outside the District.***
- ***Consider the need for a high level of water efficiency in new development in Hailsham/Hellingley, Polegate, Willingdon and Jevington, Chiddingly and Westham.'***

2.5.3 It is considered that the identified constraints can be overcome through appropriate mitigation which will enable a suitable development strategy to come forward. We do not consider that any of the alternative strategies are subject to lesser constraints which can be more easily overcome through mitigation and as such we support in principle the proposed distribution and location of housing.

2.5.4 Although the principle of the proposed distribution and location of housing is supported we raise concerns regarding the enactment of this strategy, in particular through SD1: West of Uckfield. Our concerns in relation to the allocation of this site are set out in our response to Matter 6: Uckfield Area Strategy and are therefore not duplicated here.

2.6 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?

2.6.1 We do not consider that the Core Strategy is entirely successful in providing a continuous supply of deliverable sites so that the housing requirements of the next 5 years can be delivered. Whilst the housing trajectory suggests that the Council is capable of achieving the housing requirement over the next five years this assumes a significant increase in the supply compared to historic rates. Although recent

years may not give an accurate reflection of likely housing supply given the economic recession, it is questioned on what basis the Council has based its trajectory.

2.6.2 Development of some of the strategic sites is scheduled to commence in 2015/16 at the earliest. These sites will not therefore make a significant contribution to housing completions in the first five years of the plan. Furthermore given our concerns in relation to the deliverability of the urban extension at Uckfield, SD1, as outlined in our hearing statement in relation to Matter 6, we question whether this site will contribute as anticipated to the housing completions for the District in this period.

2.6.3 As such we recommend the phasing schedule be amended to include our clients' site, Bird in Eye South, for 200 dwellings and assign it to years 2013/14 – 2016/17 for delivery. It is considered that this will help to ensure an adequate level of supply across the plan period.

2.7 Is the Core Strategy likely to result in an adequate supply of deliverable sites in the plan period beyond 5 years?

2.7.1 We consider the Core Strategy capable of achieving more than the proposed housing target and as such recommend the target be increased in order to meet more of the District's housing need. Our justification for proposing an increased housing target is set out in earlier sections of this report and is therefore not repeated.

2.7.2 The Core Strategy sets a clear basis for sites to come forward through. Although we question the allocation of SD1 we support the general distribution and location of housing development as set out in the Core Strategy.

2.8 Is there an adequate strategy for bringing previously developed land into housing use? Should there be 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?

2.8.1 We consider there to be an adequate strategy for bringing previously developed land into housing. As recognised by the Council it is unlikely that the District will be able to maintain the historic high level of development on previously developed land. The Council has reacted in an appropriate manner by recognising the need for urban extensions and ensuring that these form a key part of the strategy for the District.

2.8.2 Whilst the Core Strategy does not contain a specific policy on the overall target for the proportion of new housing on previously developed land we consider the wording of the Core Strategy to be sufficiently clear. As such we do not consider that any changes to the Core Strategy are required on this matter. This will ensure the Council has sufficient flexibility in its approach to the allocation of land for housing development.



SECTION THREE – RECOMMENDED CHANGES

3.1 In summary we recommend that the following changes be made to the Core Strategy:-

1. *SPO3:*

   Wording to be amended to the following:-

   'New housing will be provided to help address the need for homes, to ensure the economic prosperity of the District and to support its residents and the changing requirements of residents in terms of size, type, tenure and location of homes, whilst protecting our valued environment. Delivery will be phased across the 24 year period of the strategy to provide a realistic timeframe for the market to deliver the housing, and at a rate that allows our communities to adjust to the growth and create mixed and balanced communities. The timescale will also better provide for the timeframe of necessary infrastructure. The majority of new housing will be accommodated within, or as sustainable extensions to, existing towns, while allowing for limited growth within those villages capable of accommodating development in a sustainable fashion. Development will be focused in and around the settlements of Hailsham/Hellingley, Polegate/Willingdon/Stone Cross and Uckfield to help stimulate investment in those centres, and, to varying but lesser degrees, in and around Crowborough and Heathfield to meet housing need.'

2. *Policy WCS1:*

   The revision of the housing target to at least 550 dpa (13,200 over the plan period)

3. *Policy WCS4 :*

   The inclusion of an additional strategic development area – SD…: Land at Bird in Eye South, Uckfield.

4. *Policy WCS4 :*

   The inclusion of strategic development area – SD1: Land at West Uckfield, only following further investigations and with a substantial reduction in the number of dwellings to a figure that reflects certainty of the deliverability of that number.

5. *Figure 5: Phasing of Development:*

   The phasing schedule to be amended to reflect the above, to include Bird in Eye South for 200 dwellings, and assign it to years 2013/14 – 2016/2017 for delivery.

6. *Chapter 6 – Uckfield area strategy:*

   This subsection should reflect the above, in particular at para 6.11 to include Bird in Eye South for 200 dwellings, as well as through amendments to Figure 6: Uckfield Area Strategy.

Boyer Planning Limited
December 2011