Matter 3: Housing (WSC1 & WSC5)

Main Issue: Whether the overall level of housing provision and its distribution are justified and appropriate.

- WSC 1 is unsound, because it is unjustified given the robust and credible evidence base.
- It fails for the reasons set out below, in answer to the Inspector's questions.
- The CS could be made sound by increasing the level of housing provision to 11,000 dwellings over the plan period.
- The precise wording
  "Land will be identified for the provision of **11,520** additional dwellings over the period 2006-2030..."

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

The SEP, adopted 2009, requires the provision of 11,000 dwellings in Wealden over the 20 years period 2006 – 2026, split as follows:

- Wealden within Sussex Coast – 7,000 dwellings (Policy SCT:5)
- Rest of Wealden – 4,000 dwellings (Policy AOSR5)

Extrapolated forward to cover the period to 2030 the provision would be 13,200 dwellings overall with 63% of provision falling to the Sussex Coast.

There is no case to make that the provision of 9,574 dwellings (400 dpa) over the same period in any way accords with the requirements of the SEP, which:

- Should be read as a whole;
- Does include the need to safeguard the environment; but, importantly,
- Considered infrastructure and environmental constraints in its evolution

Particularly in respect of the Sussex Coast sub-region, paragraph 17.8 of the SEP confirms:

"This requirement has regard to the level of economic and demographic needs in the area together with the extent and disposition of Natura 2000 and Ramsar sites and AONB."

Notwithstanding the above, in considering the issue of conformity, in the context of the intention to revoke regional spatial strategies (confirmed by the Localism Act), and taking the plan as a whole, which recognises the environmental sensitivity of the district, it is appropriate to consider the conclusions of the examination Panel.

The Panel did not accept the 400dpa figure for Weladen, which was also put forward in the draft SEP. They did not accept that this limited level of provision was

justifiable on any basis, including need and vision, or arguments put to them in respect of environment and infrastructure constraints. Importantly they were fully aware of the constraints, which had been debated and considered. This is demonstrated by their note that:

"The Regional Assembly and other supporters of the housing level in the draft Plan tend to rely on arguments about correcting the jobs/housing imbalance, deficiencies in infrastructure and impact on the environment." (Panel Report 17.45)

The Panel's conclusion, based on the evidence before them, was to recommended that the overall provision for Wealden be increased to 480 dpa, stating at paragraphs 17.58 and 17.59:

"The draft Plan provision for the whole of Wealden district of 400 dpa is well below the RPG9 housing figure. Even so, since the level of recent dwelling completions has been under 200 dpa we recognise that delivery of the draft Plan will be challenging. Nevertheless this under provision against the RPG9 housing requirement must not be seen as an incentive to continue doing so and we are not convinced by the local authorities' arguments that the draft Plan figure for this part of Wealden is the maximum that can be achieved.

We recognise the current congestion problems and the importance of improved transport infrastructure to support further growth in this area. We consider that there should certainly be scope for private sector contributions towards new infrastructure in association with development…"

On this basis, taking the SEP requirement to balance planning for economic, environmental and social benefits, it would be appropriate to amend the overall provision for Wealden to 11,520 over the plan period, which is within 13% of the SEP plan requirement and, if expressed as a minimum, could be exceeded through additional windfall development, which, although likely to be lower than past rates as more opportunities will be allocated through the allocations DPD and neighbourhood plans, is likely to be achievable.

The way in which the Core Strategy distributes the 9,574 dwellings could be contended to fall within the requirements of the SEP, with:

- Wealden within Sussex Coast - 4,902 dwellings
- Rest of Wealden - 3,299 dwellings
- Rural Villages – 1,373 dwellings

Taking the distributional split between Sussex Coast and Rest of Wealden only, the ratio remains in favour of Sussex Coast at 60%. This proportionate split, using the higher overall requirement, could be retained.

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

Again it is relevant to look at the Panel Report and the balanced approach that they took to issues of demographics, housing need, infrastructure and environment, particularly because the Council's main justification continues to fall with constraints.

We note the WDC further response to questions (letter dated 2nd December 2011). In particular we note the statement at 1.4 that the SEP makes it clear that the Sussex Coast sub-region addresses it's own need and helps the wider regional demand. However, if taking the Panel's approach, as contended above, they stated:

"The Sussex Coast is not a sub-region that should be expected to make a substantial contribution to meeting wider needs in the South East." (Para 17.53)

As there has been no update to the SHMA it is difficult to assess whether there should be any adjustment to account for the current economic climate, although we would note the length of the plan period of 24 years and the SHMA conclusion that new housing will only impact on the margins. On this basis the SHMA must remain valid.

In respect of demographic projections, whilst evidence to the SEP used the 2004 data set, of course it did not take a predict and provide approach:

"Local demographics are not a strong argument for increasing the housing levels in the Sussex's Coast. As a proxy for natural change the projections provided by both the Regional Assembly and East Sussex CC13 indicate that in the absence of continued net in-migration the sub-regional population would decline by just over 52,000 over the next 20 years. This would however still translate into a need for an additional 18,000 dwellings, i.e. about 34% of the Policy SCT7 levels." (Para 17.48)

BUT

"The importance of strong net in-migration flows in recent years is reflected in the fact that Policy H1's housing level for the whole of the 10 constituent districts is set at about half that suggested in the Government's 2004-based household projections. Panel" (Para 17.49)

Of course, the Draft National Planning Policy Framework states that migration should be taken into account when setting local housing targets (paragraph 28).

As a consequence, even taking the 2008 data set including the reduction of 13% in the projection of household formation (WDC letter para 1.10), there is no basis to detract from the Panel position. This is supported by the projection data provided by WDC (2nd December letter 1.15).

In the context of the Governments Plan for Growth, whilst the terminology of a 'step change' in housing delivery may have disappeared the need to increase supply has not.

c) How des the overall level of housing provision in the CS relate to the need for both market and affordable housing in the District

It is clear from WDCs submissions that the Council is taking a wider approach to meeting housing need than relying solely on the delivery of new homes. Nevertheless, the provision of new homes is an important element of meeting needs, not only through the provision of affordable housing, but also by meeting wider demand and keeping supply in pace with this demand.

The demand figures identified by WDC (1.22 – 1.26) again support the higher overall figure recommended by the SEP Panel.

We disagree with the Council's contention that *"In both the 2026 and 2030 scenario the District's needs in the area defined as the Sussex Coast sub-region is being met and indeed exceeded."* (1.33) The comparison to 2026 is entirely unacceptable, that its not the time period proposed by the plan. In respect of the 2030 scenario we do not consider the need to be met, given the underestimation of household growth and real demand, but even using the Council's figures the comparison can be illustrated as follows,:

	Demand at 2030*	Core Strategy	CS adjusted to Panel recommendation
Sussex Coast	4,314 – 4,970	4,902	5,875
Rest of Wealden	6,207 – 7,151	3,299	4,032
Rural Villages		1,373	1,613
Total	10,521 – 12,121	9,574	11,520

* WDC 2nd December 1.25 & 1.26 – for 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?

We would support the distribution to Hailsham, with potential for increased provision to address the overall under-provision, and cover this in greater detail in matter 7.

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

The potential to increase housing provision at Hailsham must be considered as a reasonable alternative. There are no infrastructure constraints to this development which is allocated as an area of search for 700 dwellings but has capacity to deliver a more extensive development, as demonstrated by the SHLAA and Site Allocations DPD.

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

All of the strategic sites are phased beyond the 5 year period, placing full reliance on existing commitments to deliver in the next 5 years. The trajectory shows the rate of delivery of these commitments as 355 dpa, which, even if all of this provision comes forward for development, falls below the requirement. The Council does not seek to justify the trajectory on the basis of any potential underperformance on previously developed sites, but we understand from correspondence with Council officers that:

"the objective in the Core Strategy is to phase delivery at a constant rate to ensure that there is a continuous housing supply." (see appendix 1)

However, whilst PPS3 supports the management of land supply, this is directed to ensuring that *"at least enough sites to deliver the housing requirements over the next five years of the housing trajectory".* (para 57) There is nothing within government policy that seeks to hold back sustainable sites from being developed, indeed increasing supply and supporting the development industry is a government priority, as outlined in the Plan for Growth and the government's 'Get Britain Building' housing strategy which was announced alongside the November 2011 budget. This priority is being translated into a matter of policy through the introduction of the presumption in favour of sustainable development (NPPF).

In short, the trajectory should not be used as a constraint to hold back suitable and sustainable sites where they are in accordance with the spatial strategy and do not undermine wider policy objectives. The phasing causes the Core Strategy to be ineffective and inflexible.

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

This question continues the point above. PPS is clear that maintaining a continuous supply is about releasing "at least" the amount of land necessary. It does not require a ceiling on provision. This interpretation is clear in PPS3 para 7, which discusses the 'rolling-five year supply'. This means that as a shortfall can accumulate, so can any overprovision. Hence, holding back suitable sites will only risk the future situation of shortfall.

In any event, the trajectory alone demonstrates that insufficient land is will be released within the next 10 years to meet the requirement of 480 dpa.

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

Whilst some previously developed land may be in a sustainable location, and some may be suitable for residential redevelopment, other brownfield land will not be sustainably located, will not be suitable for housing and may be more appropriate for

other uses, for example to redress issues of town cramming or lack of open space within the urban area. The Government is removing the national 'pdl' target and as a consequence the Core Strategy policy should not be further strengthened in this regard.