Matter 3: Housing WCS 1

Mark Stephen Ltd support the general thrust of objections to the Core Strategy centred on a failure to meet a fair and proportionate element of the areas Housing Need. This short paper highlights the scope of our concerns.

Wealden is an expensive area within which to buy or rent housing and this is a factor of supply and demand as well as the desirability of the area. The historic failure to provide a plan led approach to housing provision within the district and deliver housing to meet need has elevated prices locally as recognised in the background paper Managing the Delivery of Housing (WDC Feb 2011) (the "background paper") which states at 6.4:

> *In fact Wealden has the highest ratio of all of the East Sussex authorities and is therefore one of the most difficult and expensive places in which to access the housing market. Furthermore, the Strategic Housing Market Assessment highlights that not only are a high proportion of Wealden's households unable to afford to purchase market housing, but a high proportion are also unable to afford private rented accommodation.*

In terms of the Housing Needs of the district the background paper refers to the Housing register and acknowledges:

> *Overall there are currently more than 2,100 households on the Council's Housing Register. The Housing Register data highlights particularly high levels of need in Hailsham, Polegate, Pevensey and Uckfield.*

Paragraph 6.11 identifies an annual affordable housing need of 812 in Wealden, which equates to 19488 over the plan period. Whilst this housing need is to be met from various sources including re-lets it would appear that the greatest proportion will have to be met from new builds and it demonstrates the significant and substantial nature of housing need within the District.

The background paper quantifies the change in market housing Wealden Households during the Core Strategy period at Table 3. It concludes that 16,900 new households will be formed during the Plan period. Those households are in addition to the existing households within the District.

In response to such demand and need the Regional Spatial Strategy allocation housing within the district. It required the provision of an annualised rate of 550 houses (or households) which when applied over the CS period would have equated to 13200 dwellings or 78% of the market need for new households identified by WDC in their background paper.

The reason for the RSS shortfall on the district's need is a recognition of the land constraints within the district occasioned by the National Park, SSSIs etc..

The Core Strategy seeks to make provision for just 9600 dwellings over the plan period, that equates to a shortfall of 27% on the RSS allocation and 43% on the open market housing household formation figures for the plan period. In terms of a gross affordable housing need for the plan period the total provision for the plan period of 9600 dwellings would equate to less than half the gross need over the plan period for affordable housing alone.

The Council's approach, insofar as one is able to determine an approach, seems to have started with the premise "what level of provision have we made historically and what level of permissions have we granted" and then used that as a ceiling for their ambitions to deliver housing. Whilst such considerations are material to the consideration of the appropriate level of housing they are not determinative factors and need to be weighed in the balance contrary to the approach of the Council.

This is a fundamentally flawed approach given the high levels of need in the district and would only seek to exacerbate issues of affordability within the district (as it would continue the shortage of supply within the area) and certainly would not deliver against the Council's stated objectives including those in the Wealden section of the East Sussex Sustainable Community Strategy which includes the aim for:

> *"enough decent, affordable homes to meet the needs of everyone who lives in or needs to live in the District".*

The Council's Housing Strategy 2008 – 2013 has the objective of:

> *"striving to meet housing needs"*

The Core Strategy provision of just 9600 dwellings set against the recognised levels of need within the District over the plan period would represent a plan for failure that has no basis for its artificially low housing allocation targets and has failed to explore whether higher levels of much needed provision could be accommodated.

Such an approach to the provision of housing (WCS 1) is unsound as the increased provision of housing has not been the subject to a sustainability appraisal, does not conform with the RSS and are not founded on a robust and credible evidence base.

The Core Strategy can only be made sound by increasing the number of homes to be provided during the plan period by 16900 which represents the level of identified need in that period and would be necessary to meet the Council's objectives and aims in respect of affordability. If there is sound and convincing evidence to depart from meeting the District's needs then the lower RSS figure of 13200 dwellings should be adopted. Therefore WCS 1 should be amended to read:

Land will be identified in subsequent Development Plan to provide for 16,900 dwellings over the period 2006-2030.

Matter 3: Housing WCS 4

Mark Stephen Ltd opposes the identification of Strategic Development Areas (SDA) against the background of the housing restrictions of WCS1. The net result of this approach is that within, for example, the South Hailsham area, the SDAs will account for all the Council's identified housing capacity.

As such the adoption of the SDA policy will leapfrog and make redundant the Site Allocations Process without considering the relative merits of sites for the provision of Housing in the District. The SHLAA has identified a significant number of sites within the area suitable for housing these sites have not been tested against one another and the SDA approach will prevent such an exercise being undertaken.

As an illustration of these concerns the Council has identified SDA sites 2, 4, 5, 6 and 7 all potentially served by the South of Hailsham Water Treatment Plant. The Council's position is that this treatment plant imposes a ceiling on development in this area of 1500 new dwellings (not accepted).

If the SDA approach was to be adopted it looks to provide in excess of the capacity of the plant over the plan period. As such this would prevent any alternative sites being considered or any otherwise suitable sites coming forward in the Site Allocations DPD

Such an approach to the provision of housing (WCS 4) is unsound as the identification and preference for these sites ahead of others has not been tested and as such is not based on a robust and credible evidence base.

The Core Strategy can only be made sound by deletion of WCS 4.

Therefore WCS 4 should be deleted.