dha planning
& development consultants

Redrow Homes

Examination into the Wealden District (Incorporating Part of the South Downs National Park) Core Strategy Development Plan Document

STATEMENT OF RESPONSES TO THE INSPECTOR'S QUESTIONS

Matter 3: Housing

December 2011

1 Introduction

1.1.1 This statement on 'Matter 3: Housing' has been prepared on behalf of our clients Redrow Homes, and responds to the Inspector's written questions following the submission of our client's original representations by Woolf Bond Planning in April 2011.

1.2 Matter 3: Inspector's Questions

(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?

1.2.2 No the Core Strategy is not in general conformity with the SEP. As previously set out in our client's representations, and also in representations of other participants, the Core Strategy's target housing figure is significantly lower than the housing requirement set out in the SEP.

1.2.3 As noted in several of the other representations, the Core Strategy provides no explanation for this deviation from the SEP.

(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?*

1.2.4 Since the SEP was adopted in 2009 Wealden District Council has updated its Housing Needs Assessment[1], which identifies a need totalling 812 affordable dwellings per annum over a 5 year period.

1.2.5 The Council has also produced its Strategic Housing Land Availability Assessment[2] since the SEP was adopted, which identified land considered to be suitable, available and achievable for some 22,755 homes.

1.2.6 Table 3 of Background Paper 2[3], also published since the SEP was adopted, sets out the forecast change in Wealden Households. The total projected growth in households from 2006 to 2030 is forecast to be 16,900.

1.2.7 The updated evidence base would therefore suggest that, based on the District's housing need and land availability, the level of housing provision in the Core Strategy should be significantly increased. An increased level of housing would also help to fund the infrastructure required for the urban extensions.

[1] Wealden District Council Housing Needs Assessment, January 2010 (Fordham Research)
[2] Strategic Housing Land Availability Assessment (SHLAA, March 2010)
[3] Background Paper 2: Managing the Delivery of Housing, August 2011

(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?***

1.2.8 The affordable housing need in Wealden over the 5 year period equates to 4060 dwellings, and it is acknowledged in the Housing Needs Assessment that the main means of achieving affordable housing delivery is by means of market housing subsidising and delivering affordable homes.

1.2.9 As explained in paragraph 5.17 of Background Paper 1[4], if all affordable housing were able to be delivered through the delivery of market housing and taking into account committed sites, 8,611 houses would be needed from the date of the Housing Need Assessment to meet the 5 year requirement.

1.2.10 As the proposed target level in the Core Strategy for the plan period 2006-2030 is 9600 dwellings, the level of housing currently proposed will not meet the District's long term housing need and therefore fails to accord with regional and national policy.

(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?

1.2.11 The general principle for distributing development between the different types of settlements appears to be based on a strategic approach of focusing the majority of development within and around towns, rather than the evidence base. As explained in paragraph 8.1 of Background Paper 1 *'The Core Strategy focuses upon strategic growth in terms of broad locations and provides a direction in terms of growth of smaller settlements'*.

1.2.12 From the evidence base and submission documents, it would appear that the more specific distribution between the settlements is then based on a hierarchy of settlements (Background Paper 1), need (Housing Needs Assessment), land availability (SHLAA) and infrastructure matters (Background Paper 11[5]), all of which appear to accord with national and regional policy.

1.2.13 Our concern is how the housing is distributed within the settlements rather than between the settlements.

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?

1.2.14 The distribution of housing has been largely founded on the results of Strategic Housing Land Availability Assessment (March 2010 and Addendum, October 2010), which deem land to be predominantly available within the five towns of Crowborough, Uckfield, Heathfield, Hailsham/Hellingly and Polegate/ Willingdon.

[4] Background Paper 1: Development of the Core Strategy, August 2011
[5] Background Paper 11: Infrastructure Delivery Plan, August 2011

1.2.15 Paragraph 6.19 of BP1 confirms that suitable, available and achievable land has not been identified in all Wealden's settlements. Whilst the settlements identified as having available land for housing growth are listed (Appendix 2), the settlements deemed unsuitable are not listed or explained in any further detail.

1.2.16 The five identified towns for housing growth all have infrastructure and environmental constraints as identified in Background Paper 11 (Infrastructure Delivery Plan, August 2011). Yet it has not been demonstrated in the Core Strategy that there are no other reasonable options for development growth that would avoid the constraints identified in these towns.

(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?

1.2.17 The opportunities for development on either allocated or identified sites (and excluding windfall) in Wealden amounts to provision for around 4,700 homes, sufficient to deliver the target for the next 5 years.

1.2.18 However, whether these identified sites are sufficient to ensure that the housing targets are met depends to a large extent on whether the sites are deliverable in reality and that there are no changes of circumstance which could prevent development e.g. where a landowner may refuse to sell their land. We therefore question whether all of these sites are really deliverable.

1.2.19 Despite this uncertainty, there is no contingency plan in the Core Strategy if the supply of sites starts to fall short of the housing requirement of the next 5 years.

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

1.2.20 This is questionable as there are so many uncertainties regarding the sites identified in the SHLAA as being suitable for development.

1.2.21 In particular there are concerns regarding the ownership status of the sites as there appears to be no indication in the evidence base that these owners are working together, or indeed whether they will want to work together.

1.2.22 There is also a question over the status and timescales involved for the required infrastructure to deliver the planned growth. For example in Background Paper 11 (page 38), table 4 (Critical and key infrastructure requirements for growth in Polegate/ Willingdon/ Stone Cross) under the transport column, its states that '*additional development identified in the Core Strategy is contingent on delivery of infrastructure identified*', yet there is no indication of the cost of the required infrastructure, when the works will be start or how they will be funded.

1.2.23 The supply of developable sites in the plan period beyond 5 years is therefore uncertain and not founded on a robust or credible evidence base. As with the 5 year supply of housing, there is no contingency plan identified in the Core Strategy if there are any changes in circumstances relating to the identified sites.

h). Is there an adequate supply 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?

1.2.24 No response.