Matter 3 /WDC

Wealden District (Incorporating part of the South Downs National Park)

Core Strategy Hearing

Matter 3: Housing - Statement by WDC/ SDNPA

December 2011

Wealden District Council and South Downs National Park Authority
Response to the Inspector's Matters, Issues and Questions
(Issued 3 November 2011)

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?

1.1 The overall scale and distribution of housing provision accords with the requirements of the South East Plan having regard to all the policies in the South East Plan. As explained in the Council's Response to the Summary of Concerns (reference X4a, paragraphs 1.1 to 1.13) it is considered that the Core Strategy is in general conformity with the whole of the South East Plan.

1.2 The relevant matters regarding the overall scale and distribution of housing are provided in the Council's Response to the Summary of Concerns (reference X4a, pages 15 to 22), submitted prior to the Exploratory Meeting. In detail, the relevant South East Plan policies to be regarded include:

- Policy H1 requires the preparation of plans to ensure the delivery of the annual average net additional dwelling requirement of 550 dwellings (11,000 dwellings) between 2006 and 2026. Policy SCT5 requires that local planning authorities work collaboratively to facilitate the delivery of 7,000 dwellings in the part of Wealden within the Sussex Coast Sub Region (350 per annum) and AOSR5 requires the provision of 4,000 dwellings (200 dwellings per annum) in the remaining part of Wealden. The text associated with policy AOSR5 states that "the town of Uckfield will play an important role as a small market town in supporting its wider hinterland" and that "it is expected that the town will help meet wider housing needs" (paragraph 25.27). The text further states that a balanced dispersal strategy should be used in Wealden District taking into account the role and accessibility of each rural settlement moderated by environmental designations (paragraph 25.28). The promotion of the sustainable economic growth and regeneration of the Sussex Coast underpins the Core Strategy (SCT1) in this area with some flexibility allowed for those authorities not wholly within the Sub Region.

Wealden District Council and South Downs National Park Authority
Response to the Inspector's Matters, Issues and Questions
(Issued 3 November 2011)

- The overall scale of growth and distribution is influenced by the need to comply with Policy NRM 5. Policy NRM5 relates to those settlements which affect the Ashdown Forest Special protection Area (SPA) and Special Area of Conservation (SAC) by virtue of nitrogen deposition and recreational impact as well as those settlements which affect the Pevensey Levels Ramsar Site and candidate SAC through treated waste water discharge. As explained in the Response to the Summary of Concerns (reference X4a, paragraphs 3.0 to 3.7 and 8.0 to 8.5) it is considered that the Core Strategy avoids an adverse effect on the integrity of these European sites and that we would not be able to conclude that additional development in these areas, to that set in the Core Strategy, would have no adverse effect on the integrity of the sites. Policy NRM5 is clear that the plan or project shall not be approved irrespective of conformity with other polices in the RSS, unless otherwise in compliance with 6(4) of the Habitats Directive.

1.3 In order to comply with NRM 5 those settlements outside of the affected areas have been considered for housing growth also having due regard in terms of other policies within the Plan. Particular regard to the need to ensure deliverability through land availability assessments. Taking this into account the following policies have also shaped the spatial distribution:

- Policy C2 the South Downs: The designation has had an influence on the allocation of growth with regards to East Dean and Alfriston. This is particularly relevant when considering the landscape impact of land that is available and the local needs assessment.

- Policy C3 Areas of Outstanding Natural Beauty (AONB): AONB settlements such as Heathfield accord with the policy relating to small scale proposals that are sustainably located.

Wealden District Council and South Downs National Park Authority
Response to the Inspector's Matters, Issues and Questions
(Issued 3 November 2011)

- Policy BE4 The Role of Small Rural ('Market' Towns): The strategy takes into account Policy BE4 - the need to provide for sufficient housing development in our market towns where this would reinforce and develop the distinctive character and role of the town and meet identified needs. In addition the distribution takes into account the reference in the South East Plan to "a balanced dispersal strategy ..... taking into account the role and accessibility of each rural settlement moderated by environmental designations" (paragraph 25.28). The remaining settlements are villages which, according to Policy BE5, require "to meet the defined local needs of their rural communities for small scale affordable housing" and should "define the approach to development in villages based on the functions preformed, their accessibility....". The Core Strategy takes this policy into account in allocating growth as shown in the Settlement Classification and Hierarchy in Background Paper 1: Development of the Core Strategy (reference A17 Appendix 3 and Appendix 4).

1.4 Policy CC7 entails a direct correlation between the scale and pace of development and the ability to deliver infrastructure. The need to have infrastructure in place to service new development has an impact on the phasing of sites, as well as overall scale, which is particularly relevant to the waste water treatment works.

1.5 The distribution of growth in the Core Strategy within the areas affected by the Habitats Regulations Assessment, have also been subject to these policies.

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?

2.1 There is a significant amount of evidence that has emerged since the South East Plan was adopted and supports a different level or indeed pace, of housing provision. A number of these matters of evidence were touched upon at the Exploratory Meeting held on the 12th October and also referred to by the Authorities in their responses to the Inspectors letter of 7th September (reference X4). In addition, a list of evidence bases prepared after the adoption of the South East Plan was provided on Pages 24 and 25 in the response to the Inspectors letter of 7th September (reference X4).

Wealden District Council and South Downs National Park Authority
Response to the Inspector's Matters, Issues and Questions
(Issued 3 November 2011)

2.2 Paragraphs 1.4 -1.12 of the letter to the Inspector dated 3rd October 2011 (reference X4) relate to a number of these matters. However, Appendix A provides clarification in relation to:

- Habitat Regulations
- Environmental Report on the Revocation of the South East Plan
- Infrastructure
- Economic Climate
- Household Projections

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?

3.1 The need and demand for both market and affordable housing in the District is outlined in the Response to the Summary of Inspectors Concerns and letter dated 31st October 2011 (reference Y10, paragraphs 1.1 to 1.31). It is shown that overall the level of housing provision in the Core Strategy generally meets the needs for both market and affordable housing in the District.

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?

4.1 The evidence used to underpin the distribution of growth is explained within Background Paper 1: Development of the Core Strategy (reference A17), the Sustainability Appraisal Report (reference A2) and the Background Papers of the Sustainability Appraisal Report (reference A3) and supplemented by the Portfolio Holder Report dated 8th July 2011 (reference A14, Appendix A) together with the explanation provided in the Council's Response to the Summary of Concerns (reference X4a, pages 15 to 22).

4.2 The chronology of key events, and the relevant evidence bases (including participative evidence), that lead to the final distribution are included in paragraph 3.7 in the Council's response to Matter 1, Question C.

4.3 Therefore it is concluded that the distribution has been justified by a robust and extensive evidence base.

Wealden District Council and South Downs National Park Authority
Response to the Inspector's Matters, Issues and Questions
(Issued 3 November 2011)

4.4 National guidance and regional requirements are outlined in Background Paper 1: Development of the Core Strategy (reference A17, pages 15 and 16). The strategic factors affecting growth are outlined from page 24 to 33, with national guidance having an impact on the distribution of growth in terms of promoting accessibility and focussing development in existing centres (page 24 of Background Paper 1: Development of the Core Strategy). General guidance on distribution between settlements is outlined in paragraph 6.6, where, it is advised that the majority of new development should be located at existing centres, with particular emphasis on sustainability and accessibility. This is continued through the Regional Spatial Strategy (RS), in the policies identified in paragraphs 1.1 - 1.4. Of particular relevance is focus upon Uckfield together with a balanced dispersal approach to the rest of the area (South East Plan, reference T1A, paragraphs 25.27 and 25.28) and sustainable urban mixed used extensions in the part of Wealden within the Sussex Coast Sub Region (South East Plan, reference T1A, Policies SCT1 and SCT4). It is also of relevance that development in market towns need to provide for sufficient housing development where this would reinforce and develop the distinctive character and role of the town and meet identified needs (Policy BE4). Villages should seek to meet local need, as do settlements within the AONB/ South Downs National Park whilst also having regard to their national landscape designation and the objectives of those designations (policy C2 and BE5).

4.5 National guidance impacts on the overall distribution with particular regard to Planning Policy Statement 12 which requires Core Strategies to be deliverable. Therefore the role of the Strategic Housing Land Availability Assessment (SHLAA) is crucial in providing evidence as to where suitable land is deliverable. The SHLAA has been influenced by national guidance with regards to such matters as flood risk, impact upon the High Weald Area of Outstanding Natural Beauty and South Downs National Park, impact upon international and national nature conservation sites and other issues such as landscape impact (Final Methodology for the Strategic Housing Land Availability Assessment, reference I1, paragraph 11.7 and 11.8).

4.6 Background Paper 1: Development of the Core Strategy summarises how national and regional guidance have combined with local evidence to assess and justify the potential of settlements including towns (reference A17, pages 35 to 36, pages 51 to 66 and 69 to 71) and villages (reference A17, page 39 to page 50).

Wealden District Council and South Downs National Park Authority
Response to the Inspector's Matters, Issues and Questions
(Issued 3 November 2011)

4.7 The distribution also takes into account landscape designations and the implications of the Habitat Regulations in accordance with national and regional policy as shown in paragraph 1.2. Development of sustainable urban extensions in Hailsham/ Hellingly, Polegate/ Willingdon and Stone Cross, provides for housing needs within these centres as well as reinforcing the role of the settlements, whilst meeting the requirements of the Habitats Regulations. On this basis the distribution is considered to be justified by the evidence base and accord with national and regional policy.

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?

5.1 The Issues and Options Consultation Paper 2007 (reference D1) provided reasonable alternatives to town broad locations, a rural settlement strategy and town objectives. Background Paper 8: Summary of Core Strategy Consultation and Participation (reference A6, pages 7 to 10) provides a summary of the consultation process and how this has been taken into account in the shaping of the distribution of housing.

5.2 From this consultation, and other events outlined in Background Paper 8: Summary of Core Strategy Consultation and Participation (reference A6) six alternative distributions of housing development, on a parish basis, were published under Regulation 25 Spatial Development Options Consultation 2009 (reference C1). Spatial Development Options Background Paper 3 (reference C6) provides an explanation of the development of alternative housing distribution options. It identifies the key factors underlying the options (as prescribed by national policy and the South East Plan) and the iteration of option development. In all there were five iterations of the options, and the development process is outlined in pages 5 through to 10. The six alternative distributions were subject to sustainability appraisal, which was published alongside the 2009 document (reference C3).

Wealden District Council and South Downs National Park Authority
Response to the Inspector's Matters, Issues and Questions
(Issued 3 November 2011)

5.3 Following the consideration of the consultation responses, by the LDF Sub Committee (paragraph 6.2 of Background Paper 1), two spatial distribution scenarios were produced for consideration and testing as shown in Sustainability Appraisal Background Paper 4 (reference A3, pages 179 to 180). These options were based on SHLAA published in March 2010 (reference I2) and the feedback from the consultation (reference A11), other evidence bases (as shown in paragraph 3.7 of Matter 1) as well as available information regarding infrastructure constraints. These alternatives were subject to testing and sustainability appraisal. A final iteration, derived from these two alternatives, taking into account subsequent testing and application of evidence as described in the Infrastructure Delivery Plan (reference A25) and in the Sustainability Appraisal Report (A2, reference pages 64 to 71), is produced in the Core Strategy.

5.4 Alternative broad locations of development were initially subject to consultation through the Issues and Options Consultation Paper produced in 2007. Following the SHLAA exercise the broad locations were re-formed to take into account the SHLAA evidence. The broad locations were then the subject of internal sustainability appraisal workshops where all the broad locations were assessed against the 22 Sustainability Appraisal Objectives. These are published in the Sustainability Appraisal Background Paper 5 (reference A3) with a summary of the conclusions on a town basis. From the Sustainability Appraisal, and using evidence relevant to each town the broad locations were selected from these alternatives as shown in the Sustainability Appraisal Report (reference A2, table 8.9). The summary of the Sustainability Appraisal is provided in Background Paper 1: Development of the Core Strategy (reference A17, pages 52 to 64).

5.5 The Council's Response to the Summary of Concerns (reference X4a, pages 15 to 22) shows the opportunities for an alternative distribution that would avoid infrastructure and environmental constraints. It is considered that there is not other reasonable alternatives that could be delivered that would accord to national and regional policy.

Wealden District Council and South Downs National Park Authority
Response to the Inspector's Matters, Issues and Questions
(Issued 3 November 2011)

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

6.1 The District currently has a 5 year supply of deliverable housing sites judged in relation to the South East Plan housing target. This does not include any allowance for sites which may come forward from the Core Strategy within the next 5 years. It is, however, anticipated that completions will come forward from some of the Strategic Development Areas identified within the Core Strategy within the final year of the 5 year period (i.e. 2015/16) which will help to secure further the 5 year supply. In this respect, the Council's housing trajectory makes an allowance for approximately 200 units from this source for 2015/16. This is set out in the Councils Annual Monitoring Report which is available on the Wealden District Council website. Therefore it is concluded that the Core Strategy will assist in providing a continuous supply of deliverable sites so that the housing requirements of the next five years can be delivered, taking into account the targets set by the Core Strategy.

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

7.1 It is shown in the housing trajectory that in the period from 2010/11 to 2015/16, actual and projected completions are anticipated to be well in excess of the 400 per annum required to meet the Core Strategy target of 9,600 homes over the plan period, and this does not include any allowance for windfall development which, based on past trends, will inevitably occur over this period. The housing trajectory shows that as a result of this, the annual requirement (taking account of past/projected completions) falls to 335 units per annum in 2015/16. The housing trajectory is based on a conservative estimate of development coming forward initially quite gradually from the strategic sites and this explains the dip in projected completions for the years 2016/17 to 2018/19 before development comes fully on stream from these sites. At this point in the trajectory (2015/16), the District has a 5 year supply of deliverable sites based on the completions anticipated to come forward from allocations in the Core Strategy. From this point onwards, the build out rate is anticipated to steadily increase and therefore there will be a considerable surplus in relation to the 5 year housing land supply in following years. This explains why the annual requirement figure (taking account of past/projected completions) falls in future years.

Wealden District Council and South Downs National Park Authority
Response to the Inspector's Matters, Issues and Questions
(Issued 3 November 2011)

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 Core Strategy sufficiently clear about the overall target for the proportion of new housing on previously developed land and should it be included in a policy?

8.1 The Core Strategy includes projected completions on brownfield sites as part of the housing trajectory. As part of this, and the strategy itself, the SHLAA was used to determine the amount of brownfield land that is available. Through the Strategic Sites DPD and the Delivery and Sites Allocation DPD appropriate brownfield sites will be maximised (Spatial Planning Objective14). As the majority of brownfield land in Wealden District is developed through windfall, as shown our AMR (which is available on the Wealden District Council website, and as the Core Strategy does not include windfall in its trajectory, as required by PPS3, we are unable to provide a higher level provision of brownfield as part of the trajectory.

8.2 We have made it clear in the Core Strategy the expected contribution from brownfield housing development (paragraph 5.7). As the Core Strategy does not include a windfall allowance, the only way in which we could deliver a target is through the allocation of previously developed land (which is scarce commodity particularly when the SE Plan requires urban extensions). Any policy in the Core Strategy indicating a target for brownfield land development as part of the allocations indicates some form of agreement on the allocations to be contained within the Strategic Sites Development Plan Document and Delivery and Site Allocations Development Plan Document.

8.3 Therefore, without a mechanism to deliver a brownfield housing land target, it is considered that there is no justification to provide a brownfield target in the Core Strategy. However, our Spatial Planning Objective 14 seeks to maximise brownfield sites, and this allows us to consider appropriate policies to support windfall brownfield development as part of the Delivery and Site Allocations Development Plan Document.