WDC Response to Wates questions on under-provision in Sussex Coast /Matter 3

In response to the question "Is the core strategy likely to result in an adequate supply of developable sites in the plan period beyond 5 years?", Wates (Judith Ashton Assoc) claims in paragraph G2 that there is a shortfall in the Sussex Coast sub region of 409 dwellings.

In paragraph F2 they claim the WDC response to the inspector's concerns for the EM, we are looking to accommodate 5280 dwellings in the Sussex coast at 220 pa over 24 years.

In paragraph F2, they base this on Appendix 8 of BP2 which shows 1493 dwellings which have been completed or have extant PP in Hailsham and Polegate and 610 dwellings of equivalent status in the southern parishes. This provides a total of 2103.

In G2 they then state this figure as 2031, add 2650 new strategic allocations, then add the 190 new units in the southern parishes. This arrives at a total of 4871. They then subtract this from the 5280 dwellings and find a shortfall of 409 dwellings in the Sussex coast.

There are two issues within their own argument: First, It is not clear where they get the 5280 dwellings figure from. The WDC response Table 3 shows a provision up to 2030 in the Sussex coast of 5197 dwellings and there is no mention of 220 pa over 24 years - this accounts for 83 of the 'shortfall'; Second they seem to have made a typo error of their own calculation, in F2 the existing and permitted allocations equal 2103 but in G2 they give this number as 2031 which would account for 82 dwellings. So that's a total of 165 units of 'shortfall' which can be explained through their statement.

However that would still leave a shortfall of 244 (409-165) if they were correct. As we discussed, the reason for any apparent shortfall is this:

Sussex coast = 5197 allocations according to WDC Table 3 letter to inspector. This is made up of:
2103 which are completed or have extant consent as detailed in Appendix 8 of BP2.
170 on land east of Battle Road (09/2705) as detailed in Appendix 12 of BP2.
40 on land adjacent Grovelands School, off Dunbar Drive as detailed in Appendix 12 of BP2.
44 on land south of Howard Close as detailed in Appendix 12 of BP2.

Added to this the 2650 set out in WCS 2 and the 190 in WCS 6

This equals 5197.

The issue is that Wates (Judith Ashton Assoc) have not accounted for the 254 additional units detailed in Appendix 12 and have then added to this an over-calculation in paragraph F2 (5280 starting figure) and a what seems to be a typo in G2 (2031 built and extant figure) to arrive at an under-provision of 409 units in the Sussex coast.

Table comparing JAA and WDC calculations of Sussex coast shortfall

JAA	**Development**	**Source**	**Dwellings**
	Sussex Coast Core Strategy Provision	WDC letter to inspector	5280
	Built or already committed	Appendix 8 BP2	2031
	SDAs	WCS2	2650
	Southern villages	WCS6	190
	Shortfall		-409

WDC	**Development**	**Source**	**Dwellings**
	Sussex Coast Core Strategy Provision	WDC letter to inspector table 3	5197
	Built or already committed	Appendix 8 BP2	2103
	SDAs	WCS2	2650
	Southern villages	WCS6	190
	Hailsham other built or already committed	Appendix 12 BP2	254
	Shortfall		0