Wealden Local Plan EIP: Matter 3: Objectively Assessed Needs for Housing and Employment Land
Land north of Polegate

May 2019
1. Introduction

1.1 This Statement has been prepared by Turley on behalf of our client, Taylor Wimpey Strategic Land in relation to Matter 3 – Objectively Assessed Needs for Housing and Employment Land of the Wealden Local Plan Examination.

1.2 Our clients have important land interests in the Local Plan area, including at Polegate.

1.3 We set out our response to the questions posed by the Inspector, where relevant to our client’s previous submissions, in Section Two of this Statement. Our comments have regard to national planning policy guidance and other material considerations.
2. Matters to be Examined

Issue 1: Whether the Council’s approach to calculating its full, objectively assessed needs is justified, based on up-to-date and reliable evidence, effective, positively prepared, and consistent with national policy?

Objectively Assessed Need - Housing

48. Does the plan period cover an appropriate time frame for the provision of housing (2013-2028), and is it consistent with national policy? Should it be extended. If so, why? Why is a different time period chosen to that set for employment and retail matters?

2.1 The Council’s latest Local Development Scheme (March 2019) anticipates adoption of the Local Plan in 2019. Given sessions have only been scheduled for Stage 1 of the Examination in Public to date this would appear somewhat ambitious, particularly in light of the additional work we consider necessary to ensure the Plan can be found sound. Even assuming this date is achieved, it is clear that upon adoption of the Local Plan there will be under 10 years remaining of the Plan. The NPPF (2012) makes clear that “Local Plans should…be drawn up over an appropriate timescale, preferably a 15-year time horizon” (paragraph 157).

2.2 Furthermore Policy WLP13 commits the Council to undertaking an early review, in part or full, of the Plan under a number of scenarios. It is unclear therefore whether the Plan will even reach the 9 year post-adoption Plan period in its current form, with an early review highly likely to be triggered, although clearly the undertaking and completion of such a review is unenforceable.

2.3 In light of comments regarding the housing cap the District Council has sought to impose, and the additional work it is considered necessary to address the matters raised to ensure the Plan is sound, this provides an opportunity for the Plan period to be extended to an appropriate time horizon in parallel with these workstreams.

50. Is Wealden’s functional housing market discrete? How has the housing requirement for the wider HMA been considered with particular reference to the South Downs National Park and Eastbourne BC? Should an OAHN for the wider HMA have been set in addition to the OAHN which is specific to Wealden? What influence have the overlapping and neighbouring housing markets had on the setting of Wealden’s OAHN, in particular those of Eastbourne and the South Down’s National Park?

2.4 As set out in our Statement to Matter 1: Legal Compliance, including Duty to Co-Operate, it is considered that the Plan does not meet the full OAHN for the District. Furthermore as a result of the Council’s perception of implications for the Ashdown Forest SAC which has seemingly led to growth in the District being restricted, the needs of adjoining authorities and the ability of Wealden to accommodate these needs has not been robustly tested. Further calculation, assessment and discussions are therefore required to ensure these matters are appropriately addressed and the Plan makes sufficient provision where possible in a sustainable manner.

2.5 The Proposed Modifications version of the South Downs National Park Local Plan (2019) states that the Housing and Economic Development Needs Assessment (HEDNA)
identifies an objectively assessed need of 447 homes per year and separately a need for 293 affordable homes per year. The Local Plan however only provides for a net increase of 250dpa and as such a significant shortfall exists. Whilst it is noted that the South Downs National Park does cover a number of authorities and that there is no distribution given as to where the need arises across the Park, it has not been adequately demonstrated that a proportion of this need could not be appropriately met within Wealden District or that there is no need to do so.

2.6 It is noted that the representations by Eastbourne Borough Council on the Pre-Submission version of the Local Plan identified a shortfall of at least 459 dwellings per annum based on the September 2017 SHELAA. As set out in the Duty to Cooperate Statement (August 2018) Wealden have utilised an annual requirement for 336 dpa in Eastbourne, whereas the Borough contend that the Local Housing Need for Eastbourne Borough is 649 dpa. There is therefore potentially a significant quantum of housing need not being planned for and which through the Issues and Options version of the Wealden District Local Plan the Council themselves had identified would be appropriate to be met within Wealden if they can be appropriately and sustainably located.

51. Should the recently published 2016-based household projections be taken into account in setting the OAHN? If so, what would be the consequence?

2.7 Under the transitional arrangements for the NPPF, the Wealden Local Plan falls to be examined under the NPPF (2012) and as such the standard methodology is not to be applied.

2.8 An update to the SHMA (2015) was undertaken by Regeneris Consulting Ltd on behalf of the Council (2017). This was to provide a review of the OAN based on the, at that time, most recent (2014-based) population and household projections. Following market signals adjustments an OAN of between 946 and 1,233 dpa was identified over the period 2013-2028. A similar update has not been released in respect of the 2016-based population and household projections.

2.9 The Government has recently made clear that the 2014-based household projections should be used when calculating OAHN. Whilst it is recognised that this guidance was provided in respect of the NPPF (2019) and the Local Plan is to be examined under the NPPF (2012) in accordance with the transitional arrangements, it is considered that the general thrust of guidance is of relevance. As such whilst the PPG advises that the latest evidence should be used in the calculation of OAHN, in these circumstances it is considered appropriate to use the older 2014-based projections. In any event it is noted that only a marginal difference is present between the two sets of projections in any event.

52. Is the OAHN figure of 950 dwellings per annum, robust and justified? Does it take into account appropriate market signals, household size and household formation, forecast jobs growth and the need for adequate levels of affordable housing to be provided?

2.10 The Plan proposes a housing requirement of 14,228 homes over the Plan period, equivalent to 948 dwellings per annum. This is broadly comparable with the Council’s interpretation of the Objectively Assessed Need in the Strategic Housing Market Assessment of 950 dwellings per annum, with this most recently stated in the
“Wealden Objectively Assessed Need (OAN) Update Draft Paper: 2013 to 2028” (March 2017). The Council contends that the OAN of 950 dwellings per annum is an overestimate of need as it, in their view, takes account of the needs of the part of the District falling within the South Downs National Park. Accordingly the Council have reduced the annual requirement to 948 to allow for development which would come forward in the National Park. As discussed in relation to question 50 however, a significant level of need generated within the National Park does however exist (a minimum of 197dpa) which remains unplanned for. As such it is contended that the OAHN figure is an underestimate of need.

2.11 It is notable that the SHMA and associated documentation provides a wide range of calculations of housing need from 930 to 1,233 dwellings per annum over the Plan period (2013-2028). Furthermore the evidence itself provides no indication as to which scenario the appointed technical consultants consider to be reflective of the Council’s objectively assessed need. Whilst a range of scenarios is appropriate to be tested through the SHMA it is considered that the current spectrum and the Council’s decision to proceed with a figure of 950 dwellings per annum risk underestimating the full objectively assessed need of the District. The Council have chosen to ignore the higher estimates of housing need, suggesting these are ‘outliers’ and simply taken a mid-point between the lower estimates of need. However, the discarded estimates of need are in fact those based on the official projections. Supply in the District has fallen substantially below the level of need for a significant period (whilst exceeding the Core Strategy target of 450dpa, over the period 2013-2018 the Local Plan has delivered on average 535dpa) and as such it is of even greater imperative that the Plan fully reflects the level of need going forwards and makes appropriate provision for meeting these needs.

2.12 The Council anticipates that based on their current housing target and assuming delivery of 35% affordable housing the Plan will meet the full affordable housing needs. No allowance is however made for smaller sites (10 dwellings or less) coming forward which would not be required to make affordable housing provision or sites where a lower level of affordable housing is negotiated on viability or Vacant Building Credit grounds.

2.13 As currently drafted it is considered that the Plan does not make provision for the full OAHN of the District. Higher growth scenarios should be tested to ascertain the level of growth which could be sustainably accommodated.

54. Is the level of housing planned appropriate? Should it be increased or decreased? If so, to what level and on what basis?

2.14 As discussed it is considered that the proposed housing target falls short of meeting the OAHN and appropriate consideration has not been given to the needs of adjoining authorities. Further work is required to assess the appropriate increased level of housing which should be planned for.