EXAMINATION STATEMENT – MATTER 03

Wealden District Local Plan

Representations on behalf of Catesby Property Group

May 2019
## CONTENTS

<table>
<thead>
<tr>
<th>Section</th>
<th>Title</th>
<th>Page No.</th>
</tr>
</thead>
<tbody>
<tr>
<td>1.0</td>
<td>INTRODUCTION</td>
<td>01</td>
</tr>
<tr>
<td>2.0</td>
<td>RESPONSE TO MATTER 03 – OBJECTIVELY ASSESSED NEED</td>
<td>02</td>
</tr>
</tbody>
</table>
1.0 INTRODUCTION

1.1 This Statement has been prepared by Barton Willmore LLP on behalf of our Client, Catesby Property Group. Catesby has interests in land within Wealden District.

1.2 Representations have been made on behalf of our Client during the production of the Local Plan. Our representations to the Reg 19 Proposed Submission Local Plan were, in broad terms, supportive of the spatial strategy within the Local Plan, however, we sought to provide commentary on certain areas of the Plan for which we did not consider to be sound. These aspects are addressed again in matter statements to the Examination of the Local Plan.

1.3 Notwithstanding the land interests of our Client, these representations have been prepared in recognition of prevailing planning policy and guidance, in particular the National Planning Policy Framework (NPPF) and Planning Practice Guidance (PPG).

1.4 The Local Plan was submitted during the period for when transitional arrangements for applying the 2012 NPPF were in place. Reference is therefore made to the 2012 NPPF in responses to the Inspector's questions, unless otherwise stated. These representations respond to the Inspector's questions within Matter 03 and have been considered in the context of the tests of ‘Soundness’ as set out at Para 182 of the NPPF which requires that a Plan is:

- **Positively Prepared** - the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where reasonable;
- **Justified** - the plan should be the most appropriate strategy, when considered against the reasonable alternative, based on proportionate evidence;
- **Effective** - the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities;
- **Consistent with National Policy** - the plan should enable the delivery of sustainable development in accordance with the policies in the NPPF.
2.0 RESPONSE TO MATTER 03 - OBJECTIVELY ASSESSED NEED

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?

Question 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 From the likely date of adoption (2019/2020), the Local Plan will only provide for an eight- or nine-year time horizon.

2.2 The NPPF (para 47) states that in order to boost significantly the supply of housing LPAs should identify a supply of specific, developable sites or broad locations for growth, for years 6 – 10, and:

...... where possible for 11 - 15 years.

2.3 Para 157 then confirms that “Crucially” Local Plans should be:

Drawn up over an appropriate timescale, preferably a 15-year time horizon, take account of longer-term requirements, and be kept up to date.

2.4 The Local Plan is proposed to cover the period 2013 – 2028. Whilst this is a period of 15 years (in total) it is near identical to the Core Strategy Local Plan (Feb 2013) Plan period (2013 – 2027) for which the Local Plan is seeking to replace.

2.5 The Core Strategy was originally proposed to extend up to 2030, however, the Examination Inspector recommended an earlier end date (2027), in order to provide an appropriate 15-year Plan period.

2.6 The Inspector also required that a clear commitment to an early review of the Core Strategy (by 2015) was required as the CS was unable to meet the full OAN at the time (largely due to constraints at the time relating to Hailsham Waste Water Treatment Works and Ashdown Forest).
2.7 It is against this background, that the new Local Plan needs to positively plan for the forthcoming 15 period rather than serve as a “sticking plaster” to the Core Strategy by planning for 8/9 years growth.

2.8 The Plan should therefore be revised to provide a more suitable 15-year Plan period, i.e. 2018 – 2033 to ensure the Plan is positively prepared, justified, consistent and “sound” in accordance with National policy.

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

2.9 The 2016-based household projections form the most up-to-date projections, however the recent Government technical consultation¹ has clarified that the 2014-based projections should continue to be used for the purposes of calculating housing need.

2.10 This is re-iterated in a recent update to the PPG (Reference ID: 2a-005-20190220) which confirms the 2014-based household projections reflect historic under-delivery and declining affordability and are consistent with the Government’s objective of significantly boosting the supply of homes.

**Question 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?**

2.11 No, the figure of 950 dwellings per annum is not considered to be robust or justified.

2.12 The identified OAN does not suitably consider housing affordability, in line with the requirements of the NPPF (para 17).

2.13 WDC has an established and recognised affordability issue, as confirmed by the Office for National Statistics, with a mean affordability ratio of 11.62 – above the overall average for the South East (c. 10.26) and significantly above that for England (c. 7.91).

¹ Technical consultation on updates to national planning policy and guidance (19 February 2019).
2.14 Other nearby authorities, with similar affordability issues, have been required by Local Plan Inspectors to apply uplifts to their OAN, including:

- Mid Sussex – 20% uplift applied (affordability ratio of 12.69);
- Waverley – 25% uplift applied (affordability ratio of 14.5);
- Canterbury – 20% uplift applied (affordability ratio of 11.03).

2.15 The PPG (Paragraph: 020 Reference ID: 2a-020-20140306) confirms that:

> In areas where an upward adjustment is required, plan makers should set this adjustment at a level that is reasonable. The more significant the affordability constraints (as reflected in rising prices and rents, and worsening affordability ratio) and the stronger other indicators of high demand (e.g. the differential between land prices), the larger the improvement in affordability needed and, therefore, the larger the additional supply response should be.

2.16 There is considered to be a justified upward adjustment required to account for affordability. We consider a 20% uplift to the OAN starting point\(^2\) should be applied, consistent with these other recent Inspector decisions. This results in an OAN of approximately 1,100 dpa (or 16,500 dwellings over the Plan period). To ensure the plan is found sound the full OAN will need to be established as above.

2.17 The adoption of an OAN housing figure that is lower than the OAN (+ affordability) is likely to result in an immediate review of the Plan being required. The plan is currently not considered to pro-actively meet housing needs in full and is therefore not sound.

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

2.18 The overall housing requirement needs to increase to reflect the necessary changes to both:

a) The Plan period; and
b) OAN.

\(^2\) The “starting point” for OAN is recognised as c.880dpa based on 2014 projections.
2.19 The Local Plan (para 6.3) identifies the “current” supply (2013 – 2028) as follows:

<table>
<thead>
<tr>
<th>Supply (2013 – 2028)</th>
<th>Dwellings</th>
</tr>
</thead>
<tbody>
<tr>
<td>a. Completions(^3)</td>
<td>2,421</td>
</tr>
<tr>
<td>b. Extant permissions</td>
<td>5,279</td>
</tr>
<tr>
<td>c. Proposed allocations</td>
<td>4,012</td>
</tr>
<tr>
<td>d. Proposed windfalls</td>
<td>2,516</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>14,228</strong></td>
</tr>
</tbody>
</table>

2.20 The revised Plan period (2018 – 2033) results in the need to:

a) Remove completions (2013 – 2018) from the supply; and
b) Plan for supply at the back end of the revised Plan period (from 2028 – 2033).

2.21 On the basis of a revised OAN of 1,100dpa, the housing requirement for the Plan period (2018 – 2033) is 16,500 dwellings. We therefore set out a revised supply position below:

<table>
<thead>
<tr>
<th>Revised Plan Period (2018 – 2033)</th>
<th>Revised Delivery</th>
<th>Total Revised OAN</th>
<th>Shortfall</th>
</tr>
</thead>
<tbody>
<tr>
<td>b. Extant permissions</td>
<td>5,279</td>
<td></td>
<td></td>
</tr>
<tr>
<td>c. Proposed allocations</td>
<td>4,012</td>
<td></td>
<td></td>
</tr>
<tr>
<td>d. Proposed windfalls</td>
<td>2,516</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>11,807</strong></td>
<td><strong>16,500</strong></td>
<td><strong>4,693</strong></td>
</tr>
</tbody>
</table>

2.22 The above demonstrates the necessity for additional land to be identified for +4,500 dwellings.

2.23 Notwithstanding a heavy reliance on windfall provision from 2021/22 onwards (to be addressed in Matter 04), the Housing Trajectory (Figure 3 of Local Plan) demonstrates good levels of delivery from 2020/21 – 2027/28. The additional land requirement (+4,500 units) will generally be required from 2028 – 2033 to meet the housing requirements having regard to the revised Plan period and OAN.

\(^3\) Completions to have occurred from April 2013 – September 2017
2.24 The Plan should therefore provide the additional land requirement from 2028 – 2033. Conversely, the Plan could include a further “stepping up” of the Housing Trajectory prior to 2028 with a “step down” then occurring from 2028 onwards. This will ensure that the Plan is sound and meeting housing needs.