HEARING STATEMENT

MATTER 03 – OBJECTIVELY ASSESSED NEEDS FOR HOUSING AND EMPLOYMENT LAND

30 MAY 2019

WEALDEN DISTRICT LOCAL PLAN EXAMINATION

Prepared on Behalf of Gleeson Strategic Land Limited and Rydon Homes Limited [Representor Id – 1199788]

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MAY 2019

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<th>24293/A5</th>
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<td>Status:</td>
<td>FINAL</td>
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<tr>
<td>Issue/ Rev:</td>
<td>01</td>
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<tr>
<td>Date:</td>
<td>07 May 2019</td>
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<td>Joshua Mellor</td>
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<td>Checked by:</td>
<td>Andrew Wilford</td>
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<td>Authorised by:</td>
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1.0 INTRODUCTION

1.1 This Hearing Statement has been prepared on behalf of Gleeson Strategic Land Limited and Rydon Homes Limited in respect of Matter 03 relating to Objectively Assessed Needs.
2.0 RESPONSE TO MATTER 03 - OBJECTIVELY ASSESSED NEEDS

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 The National Planning Policy Framework (NPPF, 2012) confirms at paragraph 157 that 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.

2.2 Paragraph 157 is clear, the purpose of a 15-year time horizon is to take account longer-term requirements.

2.3 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 (February 2013) Plan period which covers 2013 – 2027. The Local Plan is seeking to supersede this, but would fail to take account any longer-term requirements than the Core Strategy Local Plan.

2.4 The Council had initially, through its Issues and Options (Regulation 18) Consultation in October to December 2015 (CD C1) identified a longer Plan period 2013 – 2038, i.e. an additional 10 years. The Council amended its Plan period in March 2017 in light of evidence gathered on the impact of Nitrogen Deposition on the Ashdown Forest SAC, as detailed in Appendix B of the 13 March 2017 Joint Planning Committee meeting agenda (CD B55) which states:

Alongside the proposals for protecting the Ashdown Forest the council is proposing to revise the Plan period to be 2013 to 2028. This plan period is felt to be more appropriate given the recent Housing and Planning White Paper and provides a 15 year plan period from the adoption of the Wealden Core Strategy and a 10 year plan period from the anticipated adoption date of the Wealden Local Plan.
2.5 In light of Natural England’s Regulation 19 consultation response, highlighting improving background trends of pollution, there appears to be no need for a shorter plan-period but instead the Council should be seeking to meet its full OAN across a suitable plan-period which includes longer-term requirements.

2.6 The Council’s current approach will result in a Plan which potentially only covers circa. 8 years following adoption (assuming a mid-2020 adoption). The Council should re-adopt a longer Plan period providing a more suitable 15 year period which addresses longer-term needs. The revision to the Plan period is necessary to ensure the Plan is found “sound” with the current short period not being positively prepared, justified or consistent with national policy.

2.7 We recommend a more suitable 15 year Plan period would be 2018 – 2033.

2.8 The advancement of the base date to 2018 results in the removal of completions from supply during the revised plan period (totalling 2,421 dwellings between April 2013 and September 2017, paragraph 6.3 of the Local Plan, CD A1) but also reduces the Council’s shortfall for calculating 5-year supply.

2.9 The Council will need to allocate additional sites to meet housing needs across the latter part of the Plan period (2028 – 2033) to meet the uplift resulting from the removal of completions from supply (and any other OAN uplift implications).

**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?**

2.10 The 2016-based projections are the most up-to-date however a recent Government consultation response has clarified that the 2014-based projections should continue to be used for the purposes of calculating housing need. This is re-iterated in a recent update to Planning Practice Guidance (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.

2.11 Whilst the consultation response and PPG update specifically relate to the calculation of the Standard Method for housing, this supports the continued use of the 2014-based projections.

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¹ Technical consultation on updates to national planning policy and guidance (19 February 2019)
**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?**

2.12 No the figure of 950 dwellings per annum is not robust or justified.

2.13 The Wealden Objectively Assessed Need (OAN) Update Paper: 2013 to 2028 (CD H4) identifies a range of OAN figures from 930dpa up to 1,233dpa.

<table>
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<tr>
<th>OAN Alternative Scenarios</th>
<th>Total Dwellings (2013 - 2028)</th>
<th>Dwellings per Annum</th>
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<tbody>
<tr>
<td>10% uplift Demographic</td>
<td>15,100</td>
<td>1,005</td>
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<tr>
<td>Household Formation Rates return to 2001 conditions Demographic</td>
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<td>Cambridge Econometrics</td>
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<td>Experian Local Market Forecasts</td>
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<td>LPEG method Based on SNPP 2014 (as per LPEG)</td>
<td>18,500</td>
<td>1,233</td>
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<tr>
<td></td>
<td>Based on long-term migration</td>
<td>14,200</td>
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<tr>
<td>Standard Method (not included in OAN update paper)</td>
<td>-</td>
<td>1,231</td>
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</table>

2.14 The Housing Background Paper (CD A30) considers the appropriate OAN for the district as being 950dpa (or 14,250 dwellings across the plan period 2013 - 2028). This is deemed to correlate with “four of the six outputs” for OAN. Nevertheless, no scenario actually results in an OAN output of 950dpa, the majority being above this.

2.15 Further, the identified OAN fails to suitably consider housing affordability in line with the requirement of paragraph 17 of the NPPF 2012. Our Regulation 19 Local Plan representations included a detailed assessment of the justified uplift in regards to ONS data, recent nearby local authority Local Plan examination decisions and the Standard Method for calculating housing need. This demonstrated an uplift of at least 20% is justified in Wealden.

2.16 The figure of 950dpa is not justified, positively prepared or consistent with national policy and therefore results in a Plan that is in a not “sound”.

2.17 As detailed in the OAN and Affordability Technical Note supporting our Regulation 19 Local Plan representations an OAN considered to be “sound” including a 20% affordability uplift results in an OAN for the District of 1,108dpa based on the 2014-based projections. This is considered a conservative uplift, especially in light of the 48% uplift for affordability that would be required under the standard method.
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 Council’s overall housing requirement needs to increase to reflect the necessary changes to both Plan period and OAN as previously established in this Hearing statement.

2.19 In relation to OAN, on the basis of a conservative 20% uplift to address affordability (and reflect the 2014-based projections) the requirement is 1,108 dwellings per annum, albeit this remains on the basis of a 2013 – 2028 Plan period and there may be further variation based on longer-term trends.

2.20 Nevertheless, carrying forward the 1,108dpa requirement for the Plan period 2018 – 2033, the housing requirement for the proposed plan period is 16,620 dwellings.

2.21 The Council identifies (paragraph 6.3 of the Local Plan) a total forward supply of 11,807 dwellings comprised extant permissions, proposed allocations and proposed windfall. The 2,421 dwellings identified as completions are removed from the supply on the basis of the revised Plan period.

2.22 It will therefore be necessary for the Council to identify additional land for circa. 4,800 dwellings to meet needs over the revised Plan period 2018 – 2033.