MATTER 4
SUPPLY OF HOUSING

Hearing Session:
Day 6
(Thurs 30 May 2019)

HEARING STATEMENT

Prepared by:
Woolf Bond Planning LLP

On behalf of:
Croudace Homes Ltd

Representor ID No: 968148

May 2019

WBP Ref: 7336
Executive Summary

Croudace Homes Ltd maintain their objections to the soundness of the Submitted Local Plan for the following reasons:

- The Plan is not positively prepared having regard to the derivation of the OAN, the approach to housing needs and housing delivery generally, including having regard to the stepped trajectory.

- The Plan is not justified having regard to the spatial strategy and housing allocations, such that it cannot be said to be said to provide the most appropriate strategy when considered against the reasonable alternatives.

- The Plan is not effective and will fail to provide a five year supply of deliverable housing land and/or deliver the requisite amount of housing during the plan period.

- The Plan is not consistent with national policy having regard to the allocation and delivery assumptions relating to certain of the allocated sites, alongside the curtailed plan period.

In order for the Local Plan to provide an appropriate basis for the planning of the District to 2035 rather than 2028 as currently envisaged (thus covering a 15 year period from adoption), Croudace Homes Ltd identify a need to prepare and consult upon necessary modifications to the Local Plan in the form of amended policy wording that would, inter alia:

(i) Increase the OAN from 950dpa to at least 1,044dpa (plus unmet need from Eastbourne BC). This equates to a requirement for at least 22,968 dwellings during the period 2013 to 2035. The requirement should be applied as an annual target across the plan period to respond to longstanding unmet needs.

(ii) Additional sites should be allocated in order to meet the increased housing requirement; and to ensure sufficient housing delivery in the early part of the plan period

(iii) As a function of (ii) above, allocate land south of Bird in Eye, Uckfield for approximately 175 dwellings and associated open space (including a SANG if required) 1

The above changes are necessary in order to ensure a sound Plan.

1 We acknowledge the Inspector’s Guidance Note for the Stage 1 Hearings does not indicate when omission sites may be considered at the Examination. However, whether the Plan has assessed the reasonable alternatives is a matter of soundness, as is testing whether the spatial strategy (and hence site selection) is justified. In the event the Inspector identifies a need to increase the housing requirement and/or extends the plan period and/or identifies the need for additional housing allocations, the land south of Bird in Eye, Uckfield (Site Ref: 002A/1410) is one such location that must be considered by the Council. In this regard, we remain of the view that it represents an appropriate location for development having regard to the lack of technical constraints preventing its delivery.
Issue 1: Is the Council’s approach to its housing supply, justified, effective and consistent with national policy?

58. Is reliance on the scale of windfall housing predicated within the LP being delivered, realistic, justified and consistent with national policy? In particular, how have the Core Areas been determined? How does the projected contribution from windfall housing compare with recent housing delivery? Is it appropriate to rely to such an extent on windfall housing rather than the allocation of housing sites within a plan led system?

58.1. It is not considered that the Council’s reliance on windfall sites is realistic, justified or consistent with national policy.

58.2. The NPPF (2012) at paragraph 48 details the circumstances when authorities may make an allowance for windfalls as part of their overall supply.

58.3. Appendix 2 of the Submitted Plan indicates that the Council expects 2,516 dwellings to be completed on windfall sites between 1st October 2017 and 31st March 2028. This equates to an annual windfall rate of 240 dwellings (2,516/10.5).

58.4. Annex 2 of the Council’s Authority Monitoring Report 2017/18 (H.10) indicates that between April 2006 and March 2018, a total of 3,039 windfall completions were achieved. This equates to 253 dwellings annually.

58.5. Annex 2 also indicates that from April 2006 to March 2008, all completions in the District were windfalls and over the full 12 year period, over half the 6,015 dwellings completed arose through windfalls.

58.6. Consequently, it is considered that Wealden has to date has been over reliant on windfalls to deliver housing, especially given the paucity of allocations and other identified sites to provide homes in the intervening period. This is illustrated in the table 1 below.
Table 1: Windfall Completions

<table>
<thead>
<tr>
<th>Year</th>
<th>Total completions</th>
<th>Total windfalls</th>
<th>Windfalls as % of all completions</th>
</tr>
</thead>
<tbody>
<tr>
<td>2006/07</td>
<td>230</td>
<td>230</td>
<td>100.00%</td>
</tr>
<tr>
<td>2007/08</td>
<td>415</td>
<td>415</td>
<td>100.00%</td>
</tr>
<tr>
<td>2008/09</td>
<td>349</td>
<td>265</td>
<td>75.93%</td>
</tr>
<tr>
<td>2009/10</td>
<td>337</td>
<td>157</td>
<td>46.59%</td>
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<tr>
<td>2010/11</td>
<td>709</td>
<td>358</td>
<td>50.49%</td>
</tr>
<tr>
<td>2011/12</td>
<td>619</td>
<td>224</td>
<td>36.19%</td>
</tr>
<tr>
<td>2012/13</td>
<td>674</td>
<td>244</td>
<td>36.20%</td>
</tr>
<tr>
<td>2013/14</td>
<td>560</td>
<td>200</td>
<td>35.71%</td>
</tr>
<tr>
<td>2014/15</td>
<td>576</td>
<td>205</td>
<td>35.59%</td>
</tr>
<tr>
<td>2015/16</td>
<td>520</td>
<td>235</td>
<td>45.19%</td>
</tr>
<tr>
<td>2016/17</td>
<td>564</td>
<td>308</td>
<td>54.61%</td>
</tr>
<tr>
<td>2017/18</td>
<td>462</td>
<td>198</td>
<td>42.86%</td>
</tr>
<tr>
<td>Total</td>
<td>6,015</td>
<td>3,039</td>
<td>50.52%</td>
</tr>
</tbody>
</table>

58.7. The Glossary of the Monitoring Report indicates that windfall sites (as summarised above) were defined as:

“Sites which have not been specifically identified as available in the Local Plan process. They normally comprise previously-developed sites that have unexpectedly become available.”

58.8. However, this differs from the approach in the submitted Plan which Policy WLP7 set out, includes separate allowances for allocations/HELAA sites from windfalls.

58.9. Paragraph 2.7 of the Council’s SHELAA (Document A29) notes that sites which could only accommodate up to 4 dwellings were excluded.

58.10. As such, information on past delivery from windfalls includes completions on sites which provided 5 or more completions which will therefore entail duplication with the Council’s allowances for homes from SHELAA sites.
58.11. Furthermore, Annex 3 of the Monitoring Report indicates that there were extant permissions for 643 dwellings on sites providing up to 4 dwellings at 1st April 2018. If these were to be completed at the delivery rate achieved from windfalls (average 253 dwellings annually), this would take 2 ½ years, although for the reasons outlined above, this is considered optimistic as the historic windfall rate will include past completions achieved on sites over 4 dwellings.

58.12. The information in Appendix 2 of the submitted Plan indicates that any site with planning permission would be a “commitment” and therefore, the allowance of 2,516 dwellings from windfalls could only be delivered from sites that are not commitments, thereby avoiding any duplication.

58.13. Whilst acknowledging the differences in base dates of the land supply and windfall figures, assuming a worst case that the 2,516 windfall dwellings could not be delivered until after the 643 dwellings as a commitment were built i.e. October 2020 (2 ½ years from April 2018), this would leave 7 ½ years for them to be built by March 2028 (the current plan end date) which would equate to 335 dwellings annually. This therefore exceeds the average rate achieved on all windfall sites. On this basis, the Council’s allowance for windfalls cannot be said to be justified having regard to past trends and is also inconsistent with national guidance.

58.14. Given the Council’s unjustified approach to windfalls, (which conflicts with the requirement at paragraph 48 of the NPPF), the allowance should be significantly reduced in order to accurately reflect past windfall delivery rates. As such, and in our opinion, additional allocations included in the plan.

58.15. As detailed in our other statements, one such location for an additional allocation is land south of Bird in Eye as part of an increased emphasis on growth at and around Uckfield.

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