HEARING STATEMENT

MATTER 04 – SUPPLY OF HOUSING

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

Project Ref: 24293/A5
Status: FINAL
Issue/ Rev: 01
Date: 07 May 2019
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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 04 relating to Supply of Housing.
2.0 RESPONSE TO MATTER 4 - SUPPLY OF HOUSING

Issue 1 - Is the Council’s approach to its housing supply, justified, effective and consistent with national policy?

Question 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?

2.1 Section 4 of the Local Plan (CD A1), Spatial Objective 1 - Housing, provides a breakdown of the proposed components of housing supply, consisting of:

- Completions – 2,421 dwellings;
- Extant Consents – 5,279 dwellings;
- New Allocations – 4,012 dwellings; and
- Windfall – 2,516 dwellings.

2.2 The Plan is heavily reliant on windfall provision, making up 17.7% of the Council’s total supply for the plan-period. Discounting sites with consent and completion, windfalls account for 38.5% of the ‘new’ identified supply (i.e. new allocations and windfall).

2.3 The Authority Monitoring Report 2017/18 (AMR, CD H10) provides an update to the Plan figures, up to March 2018, noting (at para 5.24):

- Completions – 2,674 dwellings;
- Extant Consents – 5,288 dwellings;
- Allocations – 4,012 dwellings; and
- Windfall – 2,254 dwellings.

2.4 The change in the level of completions and extant consents (totalling 7,962 dwellings up from 7,700) is attributed to new planning permissions totalling 262 dwellings between September 2017 and April 2018. Paragraph 5.25 identifies these as windfalls with the corresponding Plan windfall figure above updated as such. The level of windfall provision remains high at 15.8% of total supply and 36.0% of future supply.
Paragraph 5.25 confirms that windfalls are not taken into account for the first 3no. years of the Plan (as extant planning permissions are known at this stage). The level of windfall development therefore equates to 322 dwellings per annum over the remaining 7no. year Plan period.

Annex 2 of the AMR details the scale of windfall development delivered in the District over the period 2006/07 – 2017/18 and replicated in Table 1 below:

**Table 1 - Housing Windfall Completion in Wealden District (2006/07 – 2017/18)**

<table>
<thead>
<tr>
<th>Year</th>
<th>Total Windfalls</th>
</tr>
</thead>
<tbody>
<tr>
<td>2006/07</td>
<td>230</td>
</tr>
<tr>
<td>2007/08</td>
<td>415</td>
</tr>
<tr>
<td>2008/09</td>
<td>265</td>
</tr>
<tr>
<td>2009/10</td>
<td>157</td>
</tr>
<tr>
<td>2010/11</td>
<td>358</td>
</tr>
<tr>
<td>2011/12</td>
<td>224</td>
</tr>
<tr>
<td>2012/13</td>
<td>244</td>
</tr>
<tr>
<td>2013/14</td>
<td>200</td>
</tr>
<tr>
<td>2014/15</td>
<td>204</td>
</tr>
<tr>
<td>2015/16</td>
<td>235</td>
</tr>
<tr>
<td>2016/17</td>
<td>308</td>
</tr>
<tr>
<td>2017/18</td>
<td>198</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>3,039</strong></td>
</tr>
</tbody>
</table>

On average, the Council has delivered 253 dwellings per annum as windfall. The Council has only exceeded 322 dwellings per annum as windfall on 2no. occasions, neither of which are in the proposed Plan period.

The Council is over-reliant on windfall sites to meet its housing needs across the Plan period and past evidence demonstrates it is likely to underdeliver against these requirements.

Furthermore, the opportunities for windfall development are artificially constrained by the Council’s approach to allocating specific levels of windfall development to defined Middle Super Output Areas (MSOA) across the District as set out in Policy WLP 7.

This irregular approach controls where windfall development would be acceptable with no policy mechanism allowing flexibility between MSOAs. No evidence has been provided to demonstrate how specific windfall levels will be achieved within each MSOA. Windfall
'capacity' may be fully utilised within certain MSOAs within the first few years of the Plan post adoption, whilst other MSOA capacity may not get utilised at all.

2.11 The matter is further confused as there are examples of where sites have a reduced allocated area/number, but located within a super middle output area identified for windfall development. This is the case for South Hailsham and for Policy SWGA 25 in Super Middle Output Area Wealden 017.

2.12 The Submitted LP (CD A1) presently identifies that Policy SWGA 25 allocates land in South Hailsham for 400 dwellings and education uses. The development boundary significantly extends beyond the allocation area. Policy WLP 7 identifies a windfall figure of 157 dwellings for Super Middle Output Area Wealden 17.

2.13 However, the 03 March 2017 version of the Local Plan (included as part of CD B58 but not a stand-alone Core Document) identified land in South Hailsham could accommodate up 1,025 dwellings and education uses demonstrating that Policy SWGA25 can accommodate significantly increased numbers.

2.14 It is therefore unclear why a windfall figure of 157 dwellings is identified for Super Middle Output Area Wealden 17, when there is the opportunity and availability of increasing allocated land to accommodate the required housing numbers.

2.15 By not apportioning this housing to specific sites through new allocations, there is a high degree of risk that the scale of windfall development will not be delivered and in fact not properly planned for (i.e. infrastructure). By way of example, when all Super Middle Output Areas in Hailsham are counted, this represents a figure of 801 dwellings – making it in effect the largest allocation of housing in Hailsham on no specific sites.

2.16 The Council’s current approach to windfall poses a significant risk to housing requirements not being met across the Plan period. The current approach is not justified and not effective, and the Plan therefore not sound.

2.17 If it is demonstrated necessary (through transport modelling and Air Quality requirements) for the location of housing supply to be identified and the preferred strategy to achieve this is through the use of MSOA, then specific deliverable and suitable sites should be identified and allocated to meet the majority of this supply. This approach will limit the risks posed by significant windfall development and assist in meeting housing needs across the Plan period.
2.18 As detailed in our Regulation 19 representations, Gleeson Strategic Land and Rydon Homes control additional land in South Hailsham, beyond that proposed for allocation under Policy SWGA 25, which has been tested (by the Council) as being available, suitable and deliverable. This additional land should be allocated to reduce the Council’s reliance on windfall development.