WEALDEN DISTRICT COUNCIL

LOCAL PLAN EXAMINATION HEARING

MATTER 4: Supply of Housing

SUBMITTED ON BEHALF OF HEYFORD DEVELOPMENTS LTD
1.0 Introduction

1.1 This Statement is submitted on behalf of Heyford Developments Ltd (HDL) which has a development site within the Draft Plan’s “Development Boundaries” of Hailsham. The Site, known as Land at Poplar Cottage, forms one half of a site that already has planning permission for housing development and is shown on the plans appended to this Statement (Appendix 2). The site is not allocated in the Draft Plan and is not ‘identified’ as a windfall site.

1.2 In context, HDL has secured planning permission for housing development west of the site on land leading up to and crossing Amberstone Nursery (which is being built out) and beyond the Public Footpath to the west of Amberstone Nursery on land that has been built out by Redrow Homes and adjoins Battle Road. HDL has a track record of securing planning permission for housing development in this area and has an understanding of the local housing market. The Land at Poplar Cottage is deliverable and meets the tests of availability, suitability and achievability and falls within the development boundary of Hailsham, but has not been allocated for housing.

1.3 This Statement seeks to respond to the Inspector’s Matter 4 - the supply of housing.

1.4 Appendix 1 contains HDL’s response to the consultation stage of the Draft Local Plan, in particular with regard to the policy status and the location in the Plan of SHELAA Sites. The Examination Inspector is respectfully requested to consider that response as a supporting document to this Statement.
2.0 Is the Council’s Approach Consistent with National Policy?

2.1 The housing supply matter should be seen in the context of consistent under-delivery of housing against the Interim OAN requirement and the need for the Draft Plan to demonstrate that its strategy is taking positive steps to not only buck this trend, but to significantly boost the supply of housing in the District on a consistent and sustainable basis, beyond the immediate 5 year supply of housing and for the lifetime of the Local Plan.

2.2 Over the last 5 years, the average number of new dwellings completed per annum was 535. Between 2018 and 2023, this is ‘projected’ to ramp up to 750 per annum, with this figure ramped up again to 1,179 per annum from 2023 to 2028, but there is no obvious delivery mechanism that will encourage a step-change in housing delivery.

2.3 For Hailsham, which is a town of significant growth potential, there is an anomaly in the Council’s housing strategy in that a site (such as HDL’s) could fall within the development boundaries of the town and be considered suitable and appropriate for development in principle under Policy WLP3, be recognised in the SHELAA as a deliverable site, but be held back from being delivered by ‘in principle’ Policy constraints. Having identified and designated development boundaries around Hailsham, the Plan, as a consequence, therefore recognises and identifies the town’s “settlement capacity”. However, the Plan does not follow this up and either allocates the land within the capacity or supports the land coming forward as a windfall. There is currently no Policy step to allow non-allocated’ development within the capacity of the town to come forward. It is unclear as to why the Output Area around Hailsham has been so imposed and is needlessly restrictive.
2.4 The Draft Plan over-relies on achieving housing development on brownfield land and places less reliance on the presumption in favour of sustainable development. Having identified development boundaries, land within them should by implication or definition be considered a sustainable location. The step change in delivering housing should include the promotion of housing development on land within the boundaries either through specific housing allocations, or through allowing windfall development without placing a capacity on them.

2.5 The HDL site has been assessed as deliverable, it forms part of a larger site that has planning permission, it is being promoted by a company with a track record within this sub area of Hailsham and there is no reason not to allocate the site. The housing supply requirements are not maximum, but minimum, and the Plan should seek every opportunity for housing sites to come forward on the basis that there is a presumption in favour of sustainable development. Furthermore, small/medium sized sites are important in helping the housing supply to tick over – because larger, more strategic, sites take longer to come forward and over reliance on them to meet housing supply needs can create a hiatus in the consistent supply of housing coming forward.

2.6 The Hailsham area has identified one windfall site to deliver 300 dwellings by 2028 and the Plan prevents any other windfall site coming forward. The approach should be to encourage windfall sites to come forward through a policy that also sets out that certain criteria have to be met – due to the environmental constraints. This could be achieved through an amendment to Policy AF1.
2.7 If there is an environmental constraint to housing development coming forward around Hailsham, then the Draft Plan’s Policies should be positively worded, promotional, but make reference to the need for appropriate assessments and/or mitigation measures to demonstrate that there would be no significant effects on protected sites or other sensitive locations. If the HDL site is not allocated, as currently the position, the wording of Policy AF1 should accommodate or account for sites such as the HDL land that fall within the development boundary of Hailsham.

2.8 It is clear that the Draft Plan has been prepared under a degree of investment/infrastructure uncertainty and current environmental constraints, which means that the wording of policies is heavily caveated at times and hesitant due to the requirement for further work and assessments. There should be a clear lead, certainty and a more positive approach towards housing supply throughout the Plan. This will lead to a greater level of confidence in the housing market.