MATTER 4 ‘SUPPLY OF HOUSING’

WEALDEN LOCAL PLAN EXAMINATION

STATEMENT PREPARED BY QUOD
(RESPONDENT REFERENCE: 1186776)

MAY 2019
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?

1.1 The Local Plan strategy relies heavily on windfalls as source of meeting needs. Whilst the NPPF does enable such an approach where it “will continue to provide a reliable source of supply”, we would question in this instance whether these can be considered a reliable source of supply for the purposes of the Wealden Local Plan (WLP).

1.2 In particular, other policies within the WLP are restrictive in nature to the delivery of substantial housing through windfalls. These include draft Policy WLP7, which seeks to place a cap on the level of windfall housing through setting out a settlement capacity for growth.

1.3 It is critical that the WLP is realistic and deliverable. This includes meeting the full identified housing needs. Given the proposed short timeframe of the WLP, this can only be achieved through appropriate allocations / safeguarding of land though a positively prepared plan led system. Indeed, in accordance with the NPPF, in order to boost significantly the supply of housing, local planning authorities should identify a supply of deliverable sites for years 6-10 and for years 11 to 15.

1.4 Therefore, although windfalls can be used as a source of housing supply, additional allocations should be made to provide greater certainty that the housing needs will be met. The need to fully consider further opportunities is further emphasised by the fact that the housing figure outlined in the current WLP needs to be increased beyond that currently being planned for.

1.5 Given the general policy thrust of the WLP of focusing development in the South Wealden Growth Area, which we broadly support, it is essential that all opportunities within this area are fully considered. This is particularly the case given the planned highway infrastructure improvements being promoted through the WLP – as being proposed under draft policies SWGA 3 and SWGA 4 – provide the opportunity for the delivery of substantial housing.

1.6 Such opportunities within the South Wealden Growth Area will include land adjoining Honey Pot Farm, and Cophall, Eastbourne Road, Polegate. A plan showing the extent of this area is contained at Appendix 1.

1.7 This location has long been recognised as having the potential for new housing. It was allocated for such purposes in the Non-Statutory Wealden Local Plan (NSWLP) (Policy PW1), which was approved in December 2005.

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1 Para. 48
2 Para. 47
1.8 Furthermore, as established by the Secretary of State decision\(^3\) (as summarised in our initial representations\(^4\)) this site is broadly free of constraints and provides a clear opportunity that is deliverable and in a sustainable location that can assist in meeting the housing needs of the District.

1.9 This site was also considered as part of the recent Strategic Housing and Economic Land Availability Assessment (SHELAA) (Site ref. 255/1510) undertaken by Wealden District Council (WDC). Although the SHELAA concluded that the Site was not suitable, this was due to the need for the necessary infrastructure improvements being delivered. Such improvements are being promoted through the WLP and therefore the constraint identified can be fully addressed. The SHELAA did not identify any other constraints preventing this site’s delivery. Formally identifying land at and adjoining Honey Pot Farm and Cophall for housing-led development is therefore consistent with the thrust of the Vision outlined for the South Wealden Growth area in the WLP.

1.10 The site’s suitability and potential for development needs be fully recognised within the WLP. This should be through the land being allocated for housing, or at the very least, identified as safeguarded land for residential-led development subject to the wider highway infrastructure being delivered.

1.11 In accordance with the NPPF, such approach will ensure that the WLP takes a positive plan-led approach in seeking meet the identified needs through allocating sufficient sites.

1.12 In addition, when considering the matter of windfalls, it is also evident that draft Policy WLP3 identifies boundaries for settlements across the District where the principle of development is acceptable. Outside of Development Boundaries, draft Policy WLP4 states that development will be deemed unsustainable, and not supported, unless it accords with specific policies in the development plan.

1.13 Whilst the principle of revising Development Boundaries is broadly supported, the approach fails to provide the necessary flexibility to ensure that the substantial housing needs are met. As currently worded draft policies WLP3 and WLP4 suggest a simplistic ‘in or out’ approach. Such an approach will have implications on housing delivery, particularly given the current reliance on windfalls in meeting housing needs.

1.14 In contrast, draft Policy WLP5, which deals with Core Areas of much smaller settlements does provide a more flexible approach. In particular this states that development within and adjacent to Core Areas may be acceptable. Such flexibility is not provided by the wording of draft policies WLP4 and WLP5 despite Development Boundaries capturing much larger urban areas, which by their very nature provide more sustainable locations (towns) in the District than smaller settlements covered by Core Areas.

1.15 Policies of the WLP need to be flexible so that development proposals adjoining the sustainable settlements are not immediately classified being ‘unsuitable’. Instead such proposals must be considered on their merits having regard to all the policies of the Development Plan and the NPPF. Indeed, Polegate is identified as a sustainable location for development elsewhere within the WLP. This sustainability will still apply for future housing locations currently beyond the Development Boundary.

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\(^3\) Appeal Reference APP/C1435/A/10/2130580
\(^4\) Letter dated 8\(^{th}\) October 2018
Against this background, greater flexibility is required in relation to land outside Development Boundaries if the housing needs of the District are to be met.

Specifically, we consider that draft Policy WLP3 is amended as follows (additional text underlined):

“Within and adjacent to development boundaries the principle of development is acceptable, subject to other policies contained within the development plan including Policy AF1.”

Without such flexibility the housing supply strategy outlined in the WLP will fail to provide a full opportunity to meet housing needs. The need for flexibility and to recognise development opportunities will be even greater should, as we consider is the case, the housing target currently set out in the WLP be increased. The identification of additional sites to deliver housing will ensure that WDC’s approach to its housing supply is effective and consistent with national policy.

In addition, whilst the Development Boundaries and Core Areas are proposed to be extended, they remain largely tightly drawn and are unlikely to deliver the scale of housing envisaged to be achieved through windfalls. The remedy for this is to therefore to extend the boundaries and / or formally allocate additional sites for housing. There provides further reasoning for WDC to consider further potential development opportunities within the District, and particularly in the South Wealden Growth Area.

The housing strategy outlined in the WLP places even more emphasis on the need for clarity on the timescale of any future review of the Local Plan. Draft Policy WLP3 outlines a number of future scenarios where a review will be necessary. This includes the delivery of the South Wealden Growth Area not in line with the housing trajectory. However, it fails to provide an indication when this review will take place or what it will cover. Given that the Council’s approach to housing supply relies heavily on the delivery of the South Wealden Growth Area and windfalls, it is critical that clarity is provided on the timescale of the trigger for a review and what this review will cover. As currently drafted, the wording to this policy does not explicitly state when a review will take place.

It is therefore considered necessary to provide explicit text that outlines:

• The timeframe for when a review of the Local Plan will take place and the date the Local Plan Review will be submitted to the Secretary of State; and
• What matters the review will cover, which must include formally identifying sufficient housing land to meet housing needs of the District and neighbouring areas, including any unmet need.

In terms of a timescale, given the importance of meeting housing needs, this review should commence within 3 years of adoption of the WLP, with submission to the Secretary of State by 2024. By explicitly outlining the timesframe of a review and what this will cover provides the necessary clarity.

Overall, the scale of housing need is such that it is important that sufficient sites are identified for housing within the WLP, particularly those that accord with the overall vision of focusing development within the South Wealden Growth Area. A clear opportunity exists (Land at and west of Honey Pot Farm and Cophall, Eastbourne Way) to plan positively by allocating an additional site for future housing in a sustainable location to ensure that housing needs are met. And the Council’s approach to meeting future needs is effective.
1.24 Against this background, the WLP should be modified so that it provides formal support and explicit recognition through allocating future potential growth areas that have the potential for housing delivery if the road infrastructure comes forward – as currently planned for – within the South Wealden Growth Area. Land at and west of Honey Pot Farm and Cophall, Polegate provides such an opportunity.
APPENDIX 1

SITE LOCATION PLAN