

OUR REF: DP/ LDF 0440
ASK FOR: D. Phillips 01892 602587
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YOUR REF: Letter of 31st October 2011

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Dear Lynette Benton,

Inspector's Summary of Concerns and letter dated 31st October 2011

Thank you for your letter of 31st October 2011 in which our Inspector has raised a number of detailed matters on which he is seeking the further views of the National Park and the District Council. I note that these also cover some additional points arising from the recent Exploratory Meeting held on the 12th October 2011. We have set out below our response to these matters .

The extracts from the letter dated 31st October 2011 are shown in bold and italic.

1.0 Housing Requirements

In his summary of concerns note for the EM the Inspector had asked what the Council's view was of the level of housing need in the District during the plan period. In its written response the Council referred mainly to affordable housing. At the EM the Inspector explored a wider definition of housing requirements. This had not been covered in the Council's written response but you responded verbally at the meeting. He would like to give you the opportunity to summarise your view in writing of the total District requirements (for both market and affordable housing), notwithstanding the infrastructure and environmental constraints, ahead of the hearings so that this is clear to all parties.

Question raised at Exploratory Meeting - It is not clear what the Council's view is of the level of housing need during the plan period, irrespective of any considerations of infrastructure or environmental capacities to accommodate that growth. Is it that included in the RS with some further provision for the additional 4 years in the CS plan period? What does the Council consider to be the overall level of housing need during the plan period? If the level of growth is not being met within the District is it being provided for elsewhere and, if so, where is this being accommodated? If it is not being met elsewhere what are the likely consequences for the housing needs of the District?



Housing Requirements - Definition

1.1 There is no particular guidance available to calculate housing requirements, however it is a common approach to consider housing needs and demands. The Strategic Housing Market Assessment Guidance (CLG) provides an approach to assessing housing need and demand. However, the guidance explains that housing markets are dynamic and complex and because of this, strategic housing market assessments will not provide definitive estimates of housing need, demand and market conditions (page 9). The guidance also does not combine housing demand and needs to provide a definitive calculation for housing requirements.

1.2 In terms of current policy, housing requirement and housing provision are considered to be two separate issues. The Government provides the basis for determining housing provision in Planning Policy Statement 3 (paragraph 33). It confirms that in determining housing provision a number of factors need to be taken into account including infrastructure, a sustainability appraisal as well as consideration of current and future levels of need and demand.

1.3 On the basis of national policy and Government guidance the (unconstrained) housing requirements for both market and affordable housing have not been set out in the evidence base to the Core Strategy. However, in order to respond to the question raised, the authorities will identify housing demand and need in order to provide an estimate of housing requirements. This will be compared to the Regional Strategy (South East Plan) and the targets within the Core Strategy.

South East Plan Housing Requirements

1.4 In order to compare housing requirements to the South East Plan provisions we would reiterate that the South East Plan distributed housing requirements in relation to a number of factors, including environmental and other constraints (including infrastructure) as well as economic factors. In the context of Wealden District, the South East Plan makes it clear that the Sussex Coast Sub Region addresses its own need and helps wider regional demand, and matches development requirements with the scope and limitations imposed by the physical environment. The redistribution of higher growth figures in the adopted South East Plan again did not reflect a proportional distribution across the Region based on housing need and demand, but on other factors. Therefore, the way in which the South East Plan distributed housing provision does not directly relate to housing requirements on a Local Authority basis. This needs to be understood when comparing housing provision in the South East Plan and housing requirements for Wealden.

Housing Demand

1.5 The SHMA guidance explains that in addition to demographic projections, market demand and economic factors have an impact on housing demand.

Labour Demand

1.6 The Wealden SHMA (reference I4) was published in 2007 prior to the economic downturn in 2008 however it reports that within Wealden District, North Wealden previously produced the most number of new jobs (compared to South Wealden and Eastbourne), which rose on average by 460 per annum. In contrast, just over half this level of jobs (260 per annum) were generated in South Wealden over the same period (Wealden SHMA reference I4 paragraph 1.27). The Wealden SHMA (reference I4, paragraph 1.28) also reports that economic activity levels in North Wealden are also higher than in South Wealden, which is due to the more robust economy in North Wealden and its higher levels of commuting into Tunbridge Wells, London and Gatwick when compared to South Wealden. These commuting patterns also raise residence based wages in North Wealden compared to South Wealden and Eastbourne.

1.7 The Eastbourne and South Wealden SHMA (reference I5, paragraph 1.25) reports that lower economic activity levels in Eastbourne and South Wealden are partly a consequence of weaknesses in the local economy and that there were concerns (expressed during the consultations conducted as part of the study) that the Eastbourne HMA area is becoming dormitory and that skills shortages may deter new job formation in the future (particularly higher paid jobs and those not related to the tourism and retail sectors).

Labour Supply

1.8 The Wealden SHMA (reference I4) analysis for North Wealden concludes that jobs will continue to grow, enabled by increases in activity rates of working age and growth in activity rates among retirement age people (reference I4, paragraph 1.31). However, the lack of affordability of housing may have an impact on small rural businesses reliant upon lower paid labour (reference I4, paragraph 1.31).

1.9 The Eastbourne and South Wealden SHMA analysis (reference I5, paragraph 1.29) of the composition of future household growth in the Eastbourne Housing Market area is that there may be a shortage of labour if job growth is maintained at past levels. However (from consultation with stakeholders) the SHMA reported that job growth may well be less than in the past due to skills shortages coupled with a weak economic base. The SHMA provided two scenarios firstly where there is a need for lower housing targets relative to the past to match the lower job growth or a scenario where new housing supply exceeds job growth and promotes further out commuting. The Eastbourne and South Wealden SHMA (reference I5) concludes that "new housing development will only impact at the margins in terms of its impact on factors such as workforce growth, in-migration and commuting etc since completions in one year will only add around 1% to the stock of housing" (paragraph 1.30).

Demographic Projections

1.10 The projected increase in the number of households can be determined in a number of ways. The various projections are shown in figure 1 in Appendix A. The Government, through population data generated by the Office for National Statistics, provide projections on household growth. The latest figures were published in 2010-some time after the adoption of the South East Plan, based on 2008 data. This trend based data is unconstrained by planning policy and is based on a number of assumptions, including historic data. It does not take into account future policy which may have an impact on the future patterns of growth. This data must be considered in this context. The South East Plan was based on an earlier data set (2004) and has a significantly higher rate of household growth when compared to the 2008 data. Overall the number of households projected to form from 2006 to 2026 is 1882 less in 2008 data than the 2004 data. This is some 13% of the 2004 data and therefore not insubstantial in the context of the overall growth prescribed.

1.11 East Sussex County Council also provide projections on growth, which is some 675 households less than the ONS/ CLG projections in 2026 and 1828 in 2030. In addition, East Sussex County Council provide data on the number of households that would be created if there was no migration.

1.12 There is one significant difference between ONS/ CLG and ESCC data, and that is the household formation peaks in 2021 in the ESCC data and the rate of increase is significantly less from 2021 to 2031 compared to the ONS/ CLG projections. The ONS/ CLG projection on the whole, however, increases proportionally up until 2030. It would appear that ESCC takes into account the reduced household formation of the current population in the later years of the proposed plan period that is 2021 to 2030. This information from ESCC is considered to be a more locally specific and therefore robust analysis than the generic national projection, and therefore is used as a basis of the calculation for demand. All the projections discussed here are shown in Figure 1 (Appendix A).

1.13 In addition to these data sources the historic household growth rates of Wealden District have been extrapolated to show future household growth. As the housing market, including the rate of build, is dependant on housing demand the extrapolation of household growth, based on previous rates, provides a comparative data set, against other projections, and also provides an indication of the market, in relation to household formation in order to assist the process to determine housing demand. This projection is considered to be more market orientated, compared to other projections.

1.14 The differences in the rates of change is shown in Figure 1 (Appendix A).

Projection data for 2006 to 2026

1.15 The actual projected increase in households between 2006 to 2026 are:

ONS/ CLG Projection (2004) = 14,100 households
 ONS/ CLG Projection South Wealden (2004) = 5,800 households (41% of overall)
 ONS/ CLG Projection North Wealden (2004) = 8,300 households (59% of overall)
 ONS/ CLG Projection (2008) = 12,218 households
 ESCC Migration led variant = 11,543 households
 Wealden District extrapolation based on previous trends = 8,312 households
 ESCC Zero net migration variant = 2691 households

Relationship between household formation, migration and population

1.16 Table 1 shows the pattern of household formation in Wealden District against migration and changes in population

Table 1: Migration, Population Change and Household Formation

Time period	Net migration (persons)	Population Change	Household formation
2001 - 2002	1100	616	531
2002 - 2003	1100	1000	577
2003 - 2004	900	200	456
2004 - 2005	500	700	366
2005 - 2006	600	500	295
2006 - 2007	1100	300	387
2007 - 2008	300	-124	215
2008 - 2009	100	-288	not available
2009 - 2010	1200	1008	Not available

1.17 On a yearly basis there is not a defined relationship between household formation, migration and population. This could be due to fluctuations in birth rates, death rates, size of a household when formed and social trends which will all influence household formation. Therefore there is a degree of uncertainty over household formation rates (as only the 2001 census can provide a reasonably accurate account of the number of households in the District). In addition, projections taken over a number of years will become less accurate and do not take into account the nuances of local circumstances. This is shown by the change in projections between 2004 and 2008 ONS/ CLG data, and the difference between ESCC migration led data and the 2008 ONS/ CLG data. Indeed projections are also unable to take into account the changing popularity or otherwise of locations based on economy, infrastructure provision or lack of infrastructure and social trends.

Analysis of projections

Wealden District

1.18 There is a significant degree of variation between projections with the difference between the 2008 ONS/ CLG projections and Wealden District extrapolation of 3906 households. It is considered that the ONS/ CLG projections would be a maximum projection, and the least likely to reflect local circumstances. The projections by ESCC provide a greater reflection of local circumstances but remain linked to the national data. It is acknowledged that the Wealden District extrapolation (Figure 1) will take into account previous policy constraints, but it also takes into account that circumstances in the attributes of Wealden will not change significantly in the next 20 to 24 years and provides a good basis to consider growth in the area. It is considered that providing a range and using a mid point between the ESCC projection and the Wealden District extrapolation will provide a reasonable reflection of demand in terms of household formation.

2006 to 2026 Projections

Degree of variation 8,312 and 11,543 = 3231 households

Mid point between ESCC and WD extrapolation = **9928 households**

Mid point allows for net migration of 7237 households

Sub Regions

1.19 Based on the 2004 ONS/ CLG division of demand, and with the reaffirmation of the weighting through the housing register, the different projections have been recalculated for the part of Wealden within the Sussex Coast Sub Region - to reflect the two housing Markets, as identified in the Strategic Housing Market Assessment (SHMA) for the south of the District and the rest of Wealden. The ONS/ CLG data suggests that demand is weighted 41% Sussex Coast Sub Region and 59% rest of Wealden.

Sussex Coast Sub Region

ESCC Migration led variant = 4733 households

Wealden District extrapolation based on previous trends = 3408 households

Mid point between ESCC and WD extrapolation = **4071 households**

Rest of Wealden

ESCC Migration led variant = 6810 households

Wealden District extrapolation based on previous trends = 4904 households

Mid point between ESCC and WD extrapolation = **5857 households**

Household Projection Data 2006 to 2030

1.20 By 2030 there is a greater difference between ONS and ESCC projections, and overall a difference between the extrapolated rate and ONS of 5028 households.

ONS/ CLG Projection (2008) = 15,040 households

ESCC Migration led variant = 13,212 households

WD extrapolation based on previous trends = 10,012 households

ESCC Zero net migration variant = 2,312 households

Mid point between WD extrapolation and ESCC variant = **11612 households**

Mid point allows for net migration of 9,300 households in 24 years = 388 households per annum.

Sub Regions

1.21 On the same basis as the 2026 demand calculations, the demand broken down by sub regions has been calculated

Sussex Coast Sub Region

ESCC Migration led variant = 5417 households

WD extrapolation based on previous trends = 4105 households

Mid point between WD extrapolation and ESCC = **4761 households**

Rest of Wealden

ESCC Migration led variant = 7795 households

WD extrapolation based on previous trends = 5907 households

Mid point between WD extrapolation and ESCC = **6851 households**

Relationships between Dwellings and Households

1.22 In 2006 the number of dwellings to households in Wealden District (from ESCC projection data) is 63167 dwellings to 60772 households, which is an excess of 2395 dwellings to households. The number of dwellings to households in 2006 using Council tax data is 62629 dwellings to 60688 households (ESCC estimated household data), which is an excess of 1941 properties banded for Council tax purposes. These properties include properties that are second homes, long term empty (over 6 months) and empty in the short term (less than 6 months). If some 850 dwellings are second homes¹ then 1091 are in the market or able to come into the market.

1.23 Taking this in account the demand for housing shown in households has been converted in dwelling requirements. It should be noted that market forces determine the amount of housing that is in demand, and the number of second homes may vary depending on economic circumstances. Also it should not be assumed that new dwellings will necessarily meet market demand. Therefore the relationship between dwellings and households can be oversimplified in terms of market forces, and should be acknowledged in the wider understanding of housing demand and requirements.

1.24 Based on the data provided to the authorities, the approach outlined above and taking into account the dwellings already in the market in 2006 housing demand is calculated as follows.

1.25 Housing demand in 2026 based on mid point WD extrapolation and the ESCC projection is between 8837 and 10,452 dwellings. In the Sussex Coast Region the demand is between 3623 and 4285 dwellings for the mid point WD extrapolation and the ESCC projection respectively. The housing demand in the rest of Wealden is between 5214 and 6167 dwellings for the mid point WD extrapolation and the ESCC projection respectively .

1.26 Housing demand in 2030 is between 10,521 and 12,121 based on mid point WD extrapolation and the ESCC projection. In the Sussex Coast Sub Region the demand is between 4314 and 4970. The housing demand in the rest of Wealden is between 6207 and 7151 dwellings for the mid point WD extrapolation and the ESCC projection respectively.

¹ Number of second homes in Wealden District in 2011

Affordable Housing Need

1.27 There is no change to the submission already provided for the Exploratory Meeting with regards to housing need. However, additional data is provided in Appendix B to this letter provide evidence of how housing need is met within Wealden District.

1.28 Analysis of the housing register helps reaffirm the information showing that need and demand is strong in the north of the District, as opposed to the proportions provided in the South East Plan. The housing register shows that the need for affordable housing in the north of the district is some 53% with 47% in the part of Wealden within the Sussex Coast Sub Region.

Conclusion - Housing Demand and Need

1.29 It is clear from the analysis that there is a greater need for housing provision in North Wealden than South Wealden. This is shown in the economic circumstances, the demographic projections, affordable housing requirements and from further information in our evidence base concerning land values and marketability (Strategic Housing Land Availability Assessment - reference I2, Wealden Housing Market Assessment - reference I4 and Wealden Affordable housing Viability Assessment - reference I6 and I7). Demographic projections provide an indication of household formation (based on previous trends) and a proxy for the future requirements of both market and affordable housing need. Affordable housing need requires to be considered in the context of the number of ways the need can be met, both through the public provision and the private market. The overall requirements are therefore based on household formation, taking into account the existing housing stock in the area.

Housing Demand and Need - the South East Plan and the Core Strategy

1.30 The level of housing requirements in the context of the South East Plan and the Core Strategy is shown in the following table. It seeks to address the question of what is the overall level of housing requirements, in relation to the South East Plan and the Core Strategy provision. It provides data in a comparable form to that provided in the Summary of Concerns from the Planning Inspector dated 7th September 2011.

1.31 Table 2 shows the housing targets set by the South East Plan (column 2), and the Core Strategy provision at 2026 (column 5). Column 3 shows the calculated housing requirements as a range. This range is the mid point between the WD extrapolation and the ESCC migration led variant and the ESCC migration led variant. Column 4 shows the difference between the housing requirements as calculated by the authorities and the South East Plan targets as a range and expressed as a percentage. Column 6 shows the difference between the housing requirements as calculated by the authorities and the Core Strategy provision at 2026 expressed as a percentage.

Table 2: Housing Requirements at 2026 compared to the South East Plan and the Core Strategy

	SE Plan	Housing requirements² 2026	Percentage Difference with SE Plan	Core Strategy Provision 2026	Percentage Difference Core Strategy
District Total	11,000	8837 to 10452	124% to 105%	8189	98% to 78%
Sussex Coast Sub Region	7,000	3623 to 4285	193% to 163%	4382	128% to 102%
Rest of Wealden	4,000	5214 to 6167	76% to 65%	3807	77% to 61%

1.32 The following table shows the Core Strategy provision at 2030 (column 3) and the housing requirements as a range calculated by the authorities (column 2). This range is the mid point between the WD extrapolation and the ESCC migration led variant and the ESCC migration led variant. Column 4 shows the difference between the housing requirements as calculated by the authorities and the Core Strategy provision at 2030 expressed as a percentage.

Table 3: Housing Requirements at 2030 compared to the Core Strategy

	Housing Requirements² 2030	Core Strategy Provision 2030	Percentage Difference Core Strategy
District Total	10521 to 12121	9600	91% to 79%
Sussex Coast Sub Region	4314 to 4970	5197	120% to 105%
Rest of Wealden	6207 to 7151	4377	71% to 61%

² The two sets of figures show the mid point between the WD Extrapolation and the ESCC migration led variant, and the ESCC migration led variant

Analysis

1.33 There are two distinct housing markets within Wealden, which are closely aligned to the South East Plan distinction between the part of Wealden within the Sussex Coast Sub Region and Rest of Wealden. Taking into account the significant degree of uncertainty associated with using future projections of need and demand over a 20 to 24 year period, but using the housing requirements shown in Table 2 and 3 it is considered that the Core Strategy is meeting the overall requirements up until 2026. Up until 2030 the overall requirements are met to a lesser extent. However, this must be seen in the context of both the South East Plan and the two identified housing market areas. The South East Plan can be shown to be exceeding housing need across the District, and in particular the Sussex Coast Sub Region. In both the 2026 and 2030 scenario the District's needs in the area defined as the Sussex Coast Sub region is being met and indeed exceeded. It is therefore not considered that the Core Strategy housing requirements for the part of Wealden District within the Sussex Coast Sub Region will have an adverse impact upon meeting the District's needs. It is acknowledged that the South East Plan does not allocate housing to meet the demands of the north of the District. This area has a buoyant housing market, with high land values and significant out commuting to benefit from high paid jobs outside of the District. The housing stock is generally larger than the south of the District, with many properties situated in villages and hamlets, dispersed across the countryside. Therefore in terms of the provision of housing, the needs of the District must be considered in this context. Whilst new housing is being provided in the north of the District and will help support the buoyant economy, provide affordable and smaller accommodation, which is much needed in the area the impact will be much less on the District, as although people wish to live in north Wealden they are less inclined to work and shop in the area. In addition, the demands of people wishing to move into secluded countryside locations, most of which is protected through designations, will not be met through provision of housing in more urban areas in the north of the District. The SHMA is clear that there is very limited relationship between the rest of Wealden and the part of Wealden within the Sussex Coast Sub region and therefore under provision in north Wealden will have a negligible impact on South Wealden.

Conclusion

1.34 The data and advice shows that household projections based on past trends are not a reliable, sophisticated or sensitive method for calculating housing requirements, taking into account the market and other issues. However, a range of the most appropriate household projections has been supplied to provide an indication of housing requirements for Wealden and these have been compared to the South East Plan targets and Core Strategy provision (Table 2 and Table 3). The housing market has been represented and analysis undertaken in this format. It is shown and submitted that individual District housing requirements are not the basis of the South East Plan and that the South East Plan exceeds the housing requirements of the Sussex Coast Sub Region and under supplies the North of the District. It is concluded that the Core Strategy overall meets the housing requirements of the Sussex Coast Sub Region at 2026 and 2030, but to a lesser extent the North of the District. Due to the unique circumstances of the North of the District, with high levels of out commuting, high land values and a dispersed settlement pattern it is considered that the housing provision provided in the Core Strategy would not have a detrimental impact upon the north of the District or the District as a whole.

2.0 Strategic Development Areas (SDAs)

Policy WCS4 simply lists the SDAs and provides no guidance as to the scale or type of development or infrastructure requirements involved. With the exception of SD12 at Frant, the area strategies in section 6 of the document (for example para 6.11 on Uckfield, para 6.31 on Polegate/Willingdon/Stone Cross) provide guidance of this kind for each SDA, set in the context of the wider strategy for the settlement. These paragraphs read as policy. Could the Council explain why it chose to present the CS in this way rather than maintaining a clear distinction between policies and supporting justification? Would it be more appropriate to include the area strategies in policies?

2.1 The Council has adopted this approach for a number of reasons. Firstly, it has always been led to understand that the number of policies within Core Strategies should be kept to a minimum. This still appears to be the basis of advice from Government (although we are also mindful of proposals within the draft National Planning Policy Framework). Secondly, the Council's submitted Local Development Scheme was approved by GOSE and clearly sets out the Council's intention to produce a Strategic Sites Development Plan Document shortly after the Core Strategy and the level of detail that will be contained within this Development Plan Document (DPD).

2.2 Therefore whilst it was always considered that policies should be included to clearly identify the broad areas and quantum of growth proposed it was not considered appropriate to include detailed policy wording for each Strategic Development Area (SDA) in the strategy itself. Rather the Strategy was setting out broad objectives for delivery within these areas. In response to the specific query raised, Policy WCS2 does give clear guidance as to the scale of growth proposed, both within the overall Core Strategy, and also in respect of each of the SDAs identified at WCS4. More specific work and consultation was always envisaged as part of developing our Strategic Sites DPD in order to help shape these objectives into policies that could then be consulted upon. This work is well underway and indeed reflected within the proposed Regulation 25 consultation draft of our Strategic Sites DPD which was considered by the Council's LDF Sub Committee on 9th November 2011³. It is proposed that with the additional evidence that we have gathered and that we gain from the Regulation 25 and Regulation 27 stages for our Strategic Sites DPD, as it relates to each SDA, that we will have identified the more detailed evidence of e.g. infrastructure requirements (including affordable housing) involved in order to support the policies for each SDA.

2.3 For the SDAs relating to Stone Cross and Crowborough, for example, no specific decisions have as yet been taken as to which of the SHLAA suitable sites being considered will be selected for development. This would make the application of such an approach (namely to incorporate this wording as any generic policy) difficult to apply to all SDAs since work through the Strategic Sites DPD on limits and boundaries to development are still subject to consultation. As any policy would also need to be reflected by changes to the Proposals Map (PM) we do not yet consider that we are in a position to apply this to our SDAs .

³ The Agenda Papers for the Local Development Framework Sub Committee for 9th November 2011 can be found at <http://council.wealden.gov.uk/ieListDocuments.aspx?CId=534&MId=3323&Ver=4>

3.0 Rural Areas Strategy

As part of the rural areas strategy, Policy WCS6 removes development boundaries from neighbourhood centres or unclassified settlements. At the same time it is proposing housing allocations in some of these settlements which will be made in the Delivery and Site Allocations DPD. The Local Development Scheme shows that this DPD will not be adopted until the end of 2013. There will therefore be a period within which proposals may come forward relating to these settlements in the absence of both a development boundary and a specific allocation to direct development. Is the Council satisfied that there will be an adequate planning framework in these settlements during this period? The scale of housing allocations in individual villages made in Policy WCS6 is mostly small. Is this level of detail appropriate to a core strategy or should it be a matter for a subsequent DPD?

3.1 The Council has consulted upon and developed its rural areas strategy/ settlement hierarchy including the matter of retaining or removing Development Boundaries since early consultation in 2007. Advice given following an earlier "critical friend" visit from the Inspectorate (PINS) was that in those settlements not being promoted for growth it would be prudent to propose removal of development boundaries since these would otherwise allow/ encourage the principle of development within them and was thus an approach which was contrary to the settlement hierarchy and approach that was being promoted within the Core Strategy. This advice was offered with the knowledge of the Council's approach for the production of subsequent DPDs to cover other matters e.g. site allocations for the villages. The Council has retained, as saved Policies, the adopted Wealden Local Plan Policies that apply to assessment of development proposals within and outside of Development Boundaries.

3.2 Following further work undertaken as part of the 2009 consultation, it is proposed to remove a number of development boundaries, in order to ensure most growth is directed to the more sustainable settlements. However, in some other smaller settlements where the prospect of small scale growth was supported by the evidence base and shown to be possible (e.g. SHLAA suitable land) and supported by Parish and Town Councils some local growth was identified.

3.3 Whilst in some instances this level of growth (when taken in isolation for certain settlements) is indeed small for a strategic document it is nevertheless important to show an overall "at least" growth figure for the villages and also to enable those who may wish to promote Neighbourhood Plans to do so. This is indeed encouraged at paragraph 7.17 of the Core Strategy, and a number of our Parishes have already expressed interest in this element of the Localism Bill. Whilst it is possible that some proposals for development may come forward in advance of the Site Allocations DPDs being adopted these could be considered on their own merits and against the broad principles and quantum set within the Strategy itself. The recent nature of the legislative framework to LDF production has meant that pragmatically it will be difficult for any LPA to be able, in one hit, to produce its entire suite of LDF documents in rapid succession. Indeed until the Core Strategy is in place to produce other DPDs to advanced stages would be an approach that would run a high risk of abortive work being carried out.

3.4 Thus it is likely there will be such small scale developments that in any case have to be considered on their own merits, but we set out at Paragraph 6.45 of the Core Strategy how, in the interim, we intend to use saved policies and national guidance to support development management decisions. As referred to above we have Saved Policies in respect of Development Boundaries to provide clarity for policy assessment purposes.

4.0 Affordable Housing

Para 7.13 indicates that it is possible that there may be viability issues on specific sites and para 7.14 refers to flexibility in meeting affordable housing targets where they cannot be achieved due to economic viability. However, this is not carried through into Policy WCS8 which makes no reference to the viability of development. Given the approach in PPS3 and case law and the need for clarity and consistency would the Council consider an appropriately worded change to Policy WCS8 that would introduce a reference to viability? Such a change may meet concerns raised in some of the representations.

In June 2011 there was a change to the definition of affordable housing in Annex B of PPS3 to include affordable rented housing. Does this have any implications for the CS?

4.1 The Council has undertaken specific viability work (Wealden Affordable Housing Viability Assessment Three Dragons, Reference I6 and I7) and commissioned a viability expert, with regards to Strategic Housing Land Availability Assessment (SHLAA), in looking to develop its Core Strategy. In addition, with regards to the matter of viability in respect of meeting affordable housing targets we believe that this matter is adequately covered in the second paragraph of Policy WCS8 which confirms that "a different and potentially higher target may be specified in site allocations DPDs" which will consider this having regards to viability assessments and site specific considerations.

4.2 We are also aware that advice on viability is contained within PPS3 Housing and we are not intending therefore to duplicate national guidance. We are of course aware that one of the proposed elements of the draft NPPF was to cancel a number of PPS's and PPGs. Within paragraphs 7.13 and 7.14 of the Core Strategy we have set out how the Council intends to deal with these matters, including the matter of viability. These paragraphs reflect the clear policy guidance set out in PPS3. We are aware that the timescales for introduction of any final version of the NPPF have recently been confirmed by Ministers as being some way into the future yet. In this respect therefore we do not feel it necessary to repeat within the Core Strategy policy itself the policy guidance that is contained within PPS3.

4.3 We do not consider that the change to the definition of affordable housing in Annex B of PPS3 would or should affect the Core Strategy providing of course that the PPS itself stays. The Council's formal response to the NPPF consultation has set out our views on the policy void that may be created by cancellation of a number of PPS's - particularly when we are advised not to repeat national guidance within core strategies.

5.0 Gypsies and Travellers

This will be one of the Inspector's main matters for consideration during the Examination. Representations have been made in relation to Policies WCS10 and WCS11. However, parties have generally not asked to be heard on this matter so he is likely to deal with it by way of the representations made and any further written submissions in accordance with his Guidance Notes. In any further submission on this from the Council in due course the Inspector would wish to see a response to the representations made by the National Federation of Gypsy Liaison Groups and the Traveller Law Reform Project. The Council may also wish to comment on the weight to be attached to the draft PPS on Planning for Traveller Sites and the Government's intention to revoke Circulars 01/2006 and 04/2007.

5.1 In respect of Policy WCS10 the Council has chosen to opt for the higher provision figures (i.e. higher than those in the advice given to GOSE) arising from the partial review of the South East Plan. Although this review was never concluded a Freedom of Information Request from the Traveller Community resulted in a preliminary conclusion from the Inspector appointed which confirms slightly higher numbers being needed. Further information is provided in Background Paper 4 Provision for Gypsies and Travellers (reference A20) and a more detailed response to the representations received will be forwarded in response to Matter 13 identified for consideration at the Hearing.

5.2 Policy WCS11 has been developed following consultation including with representatives of the Gypsy and Traveller community. The positive criteria sets out clearly how sites will be assessed in future DPDs and for assessing applications. The Council's response to the recent CLG consultation is attached as Appendix C.

5.3 We consider that any draft PPS would carry little weight when the final version may change considerably. We also question, in the light of the broad objectives of a "fair playing field for all" why it may appear we will still have a PPS covering this matter when the draft NPPF suggests it will be seeking to cancel all PPSs dealing with other matters. We believe we have adopted a reasonable approach in setting both a Policy and a needs figure that is based upon the latest (and higher) figures of need for Wealden arising from the Freedom of Information request of the partial review of the South East Plan as mentioned above. In response to the invitation to comment upon other matters we consider that the Government's intention to revoke current Circulars and the consideration of the possible impacts of this would need to be addressed in the light of any final version of a PPS.

6.0 Green Infrastructure

Policy WCS13 indicates that the Council would require all new residential development to contribute to the green infrastructure network and make provision for new open space. However, in the light of Circular 05/2005 and the CIL regulations, would this requirement apply in all cases even where the existing provision in the locality was adequate? If not then should the policy be amended to bring it in line with national policy?

It would be helpful if the Inspector could be brought up to date on the Council's likely approach to CIL and therefore the role, if any, that it may play in delivering the infrastructure identified in the CS?

6.1 At the Exploratory Meeting the Council advised, in respect of SANGS provision, that both provision for SANGS and for open space provision could be required. In generally considering requirements for Green Infrastructure the Council has considered also the requirements of PPS9 which, in essence, require all developments to be at least "biodiversity neutral" and to enhance where appropriate. Since any development will, per se, remove and reduce potentially available greenspace and habitat within a District such as Wealden we believe that it is appropriate for the wording of WCS13 to require this.

6.2 We accept that in not all cases might new open space AND green infrastructure be required to be provided but some contribution could be expected to the enhancement of existing open space provision where justified. We would therefore suggest that the wording of WCS13 be slightly amended to clarify this. This would then read "All new residential development will be required to contribute to the green infrastructure network and **where appropriate to make provision for new or enhancement of existing open space.**"

6.3 The Inspector has also enquired as to our progress on developing a CIL charging schedule and the role this might take in delivering infrastructure identified within the CS. Wealden District Council has recently reported to Members on the revised Local Development Scheme and can confirm that the production of a CIL charging regime for part of Wealden covered by Wealden District Council as Local Planning Authority is specifically set out within the work programme (LDF Sub Committee 9th November). This revised LDS was approved by Council on 30th November (approved LDS attached at Appendix D). We anticipate consulting upon a preliminary CIL charging schedule in July 2012 and subsequently to take this forward for a joint examination with our Strategic Sites Development Plan Document as both documents will have elements of shared evidence base in respect of infrastructure requirements and viability.

6.4 As part of a Countywide group of LPAs we have also financially committed to jointly commissioning viability studies to help support and develop our CIL charging regimes and a draft brief has been prepared which will invite tenders for this work in January 2012. We consider that it is critical that CIL is developed alongside the SSDPD in order to help identify the funding gaps for the critical infrastructure needed to support our Core Strategy and that CIL will be expected to contribute to. We anticipate submission of the charging schedule in March 2013. The Council will be responding to the Government's current consultation on the CIL regulations.

7.0 Climate Change and Sustainable Construction and Design

The Council has undertaken work in relation to setting a carbon emission target for both residential and commercial properties in the Wealden Renewable Energy Study. There are no policies for sustainable construction in the CS and the question of imposing targets appears to be one which will be addressed in subsequent DPDs. However, para 7.29 of the CS indicates that in the light of proposed revisions to Part L of the Building Regulations it will not be necessary to duplicate a similar provision, albeit more rapidly implemented, in the CS. The reference to more rapid implementation seems to run ahead of policy. Is it necessary to include this in the CS when presumably it is intended that the matter should be subject to public examination in the context of a later DPD?

7.1 This approach (i.e. reference within the Core Strategy) was considered necessary in the light of a number of consultation comments received during development of the Core Strategy which suggested that this matter should at least be referred to within the strategy. If it unclear why this was referred to in this way the matter can be addressed by omission from the Core Strategy of the words "albeit more rapidly implemented" (in the Core Strategy).

8.0 Monitoring and Implementation

PPS12 indicates that core strategies should include clear arrangements for monitoring and reporting. Monitoring provides the basis on which the contingency plans within the strategy would be triggered. The delivery strategy should contain clear targets or measurable outcomes to assist this process. The CS includes a short section on delivery which touches on monitoring. However, the detail on monitoring is contained in Background Paper 13: Implementation and Monitoring Framework (BP13). Is the Council satisfied that this approach is compatible with the requirements of PPS12? Amongst other things, BP13 sets out a series of indicators and targets relating to objectives in the Sustainability Appraisal. These are expressed mostly in general terms. There are no milestones or trigger points and consequent actions should monitoring show that targets are not being met. Should there be a clearer indication of the circumstances under which the strategy might need to be adjusted and what the appropriate courses of action might be?

8.1 The Council's arrangements for monitoring and reporting on delivery of the Core Strategy are set out at paragraphs 8.4-8.6. PPS12 requires that we show clear arrangements for monitoring but does not require that all of this detail is set out within the Core Strategy itself. We have chosen to do this through our Annual Monitoring report and this is referenced within Background paper 13 (BP13) and within in the Strategy itself (paragraph 8.5). We have indicated at paragraph 8.5 of the Core Strategy that we will use our Annual Monitoring Report process to identify the need to review any elements of the Core Strategy where monitoring has identified a sustained failure to meet targets set or which are necessary to meet changes in national policy. Paragraph 4.47 of PPS12 sets out guidance on how the AMR will deal with monitoring and implementation. We believe that the Council's proposed approach is consistent with, and accords with, the advice given in PPS12.

8.2 We also refer in the Infrastructure Section of the Core Strategy to the need to monitor and review with infrastructure providers the delivery of necessary infrastructure (including through regular updates to our IDP) and that this will be reported as part of the LDF monitoring arrangements in the Annual Monitoring Report. At paragraph 5.5 of the Core Strategy we also refer to the review of our housing delivery through the AMR and the updating of the housing trajectory to demonstrate how progress will be made on meeting our housing growth targets. The strategy refers for example within the south Wealden section (paragraph 6.32) to monitoring of infrastructure delivery and how the strategy will be reviewed if necessary in accordance with our AMR. We also for example confirm in respect of growth at Uckfield (SD1) to a trigger point that would, if not met, require review of the strategy if delivery was not taking place.

8.3 Since arrangements for production of AMRs have recently changed and the Council is no longer required to produce these reports to a set prescribed format or formula - we welcome this change. Our most recent AMR will be considered by Cabinet on 14th December and sets out in detail those indicators and targets that will be contained within the AMR and where milestones and trigger points may result in further actions where targets are not being met. This approach, particularly as it relates to delivery of Housing is referred to within Policy WCS5 of the Core Strategy which also refers to our housing trajectory. Our most recent AMR contains numerous indicators for monitoring together with targets and clear trigger points to monitor and ensure successful delivery of the strategy. The Council will be appending the AMR in the statement providing the response to the Matters raised by the Inspector for the Hearing, which will be sent by 16th December 2011.

9.0 Proposals Map (PM)

At the EM the Inspector discussed with you whether the zonings relating to Ashdown Forest and referred to in CS para 3.32 should be shown on the PM. The Council's approach is that the detailed policy will be included in a subsequent DPD and therefore presumably the PM would be amended at that stage. The Inspector understands the logic of that but nevertheless the development strategy in the CS is based in part on the measures included in para 3.32. In that context, can the Council consider whether an appropriate brief reference to the intention to introduce the 400m and 7km zones, with the detail to be provided in a subsequent named DPD, could be introduced into a policy, perhaps WCS12. That would leave the detail and PM changes to the later stage but also confirm that these measures are a crucial component of the CS.

9.1 The Inspector has enquired whether there might be a reference inserted into Policy WCS12 to reflect the nature of the Council's approach to ensuring development does not adversely affect the integrity of the Ashdown Forest and further whether the limitations shown by its evidence (400m and 7km) might not be shown on the proposals map (PM). The Core Strategy refers clearly at paragraph 3.32 to the two principal criteria (400m and 7km) for enabling the Council to meet its primary stated objective of protecting the integrity of the Ashdown Forest as a European designated site. We are aware that in accordance with the advice received from Natural England (NE) and from our Habitat Regulations Assessment evidence that these clearly indicate how this is to be achieved. However it is possible, following appropriate screening that, for example, residential developments beyond 400m may also be deemed to have an adverse impact which may or may not be able to be adequately mitigated. This might also apply to the availability and achievability of SANGs for developments that may be being proposed beyond the 7 kilometre radius of the Forest.

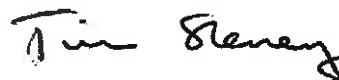
9.2 In this regard whilst there will be guidance afforded by the 400m and 7km thresholds as set down within the Core Strategy it is possible, following screening, that developments outside of these limits will nevertheless require provision of SANGs or that evidence of no significant impact for net increases in dwellings is not proven. We have set out at SPO1 our strategic planning objective in respect of protecting and enhancing biodiversity and with specific reference to the Ashdown Forest. The Council would therefore consider that any policy showing an intention to include these limits may require changes to the Proposals Map and would anyway at this stage be premature until it has been able to develop with NE more detailed Policy Guidance within the Site Allocation DPDs.

9.3 However we are happy to receive the Inspector's further views on this, and we would be willing to include in the text in paragraph 3.32 the intention to develop more detailed policy advice within the Councils Site Allocations Development Plan Documents, taking into account the zones identified in the Habitat Regulations Assessment.

Yours sincerely,



David L. Phillips
Head of Planning and Environmental Policy
Wealden District Council



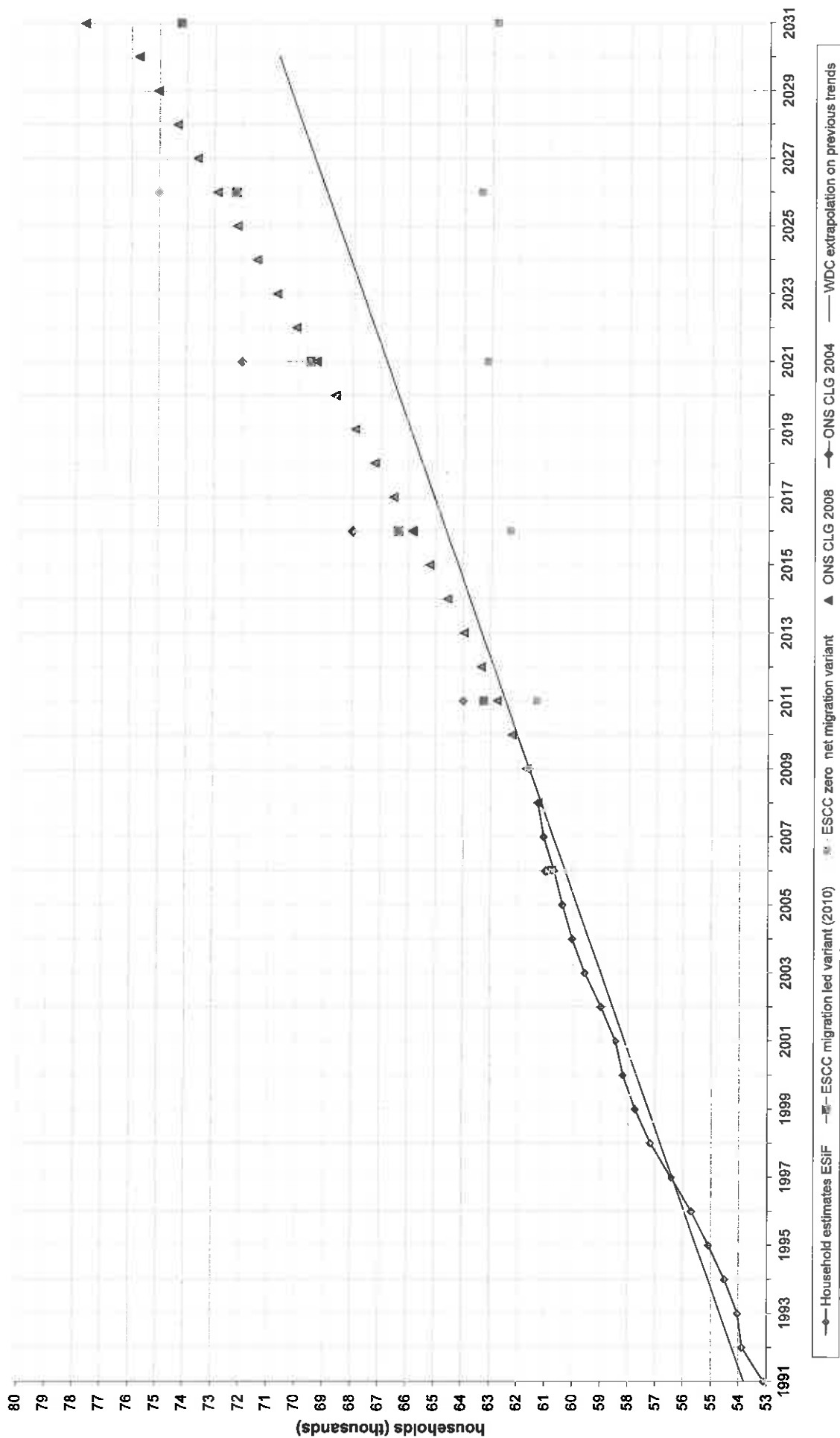
Tim Slaney
Director of Planning
South Downs National Park Authority

**Wealden District Council and South Downs
National Park Authority Response to the
Summary of the Inspector's Concerns and letter
dated 31st October 2011**

Appendix A

Household Estimates (1991 to 2008) and Household Projections

Figure 1: Household Estimates (1991 to 2008) and Household Projections



**Wealden District Council and South Downs
National Park Authority Response to the
Summary of the Inspector's Concerns and letter
dated 31st October 2011**

Appendix B

Statement of Affordable Housing Need

Appendix B

Statement of Affordable Housing Need

The Council uses several indicators of need to calculate housing need in the District. The primary sources are:

- Housing Needs Survey
- Wealden District Council's Housing Register

The Council has commissioned a Housing Needs Survey approximately every five years since they were introduced. The latest Housing Needs Survey was commissioned in 2009 and carried out by Fordham Research. This Survey as with previous Surveys meets best practice and adheres to the relevant guidance on Housing Needs Surveys. The Housing Needs Survey identifies a housing need of 812 per year in Wealden. This figure is consistent with previous studies, the 2005 Study identified a housing need of 874 per year.

The Council's Housing Register presents a good picture of the number of households seeking affordable accommodation in the District and the type of accommodation required. It has remained a consistent barometer of need over the last 7 years with around 2000 households seeking affordable accommodation registered on the Council's Housing Register of which around 15% are people in existing affordable housing that require a larger or smaller home.

The Non-Statutory Local Plan 2005 identifies land to provide approximately 4683 new homes in the District from 2006 to 2011, of which an average 30% will be affordable. As sites started to be developed out, the level of affordable housing produced has increased year by year from 26 completed homes in 2007 to 215 completed homes in 2010/11.

Although the Housing Needs Survey identifies a housing need of 812 per year; this does not equate to the need to build 812 new affordable homes per year. There are many housing solutions available to help meet housing need other than building new homes. Housing need can be met in a variety of ways ie an elderly person may be classified as in housing need as they do not have adequate heating or unable to get into the bath. These needs can be met with assistance in installing appropriate heating and installation of a walk in shower through a disabled facilities grant.

Below are examples of different methods Wealden District Council, as Housing Authority, uses to satisfy local housing needs. It should be noted there is an element of double counting; (so figures give an indication of households helped) for example a household may have sought housing advice and debt advice and then assisted with a deposit to rent on the private market. Solutions to meeting housing need include:

- Major and minor adaptations to existing homes to allow the occupant to remain in their homes this could be anything from handrails to a stair lift/ through floor lift or walk in shower supplied through a Disabled Facilities

Appendix B

Grant - 123 major adaptations and 115 minor adaptations carried out during 2010/11.

- Improving owner occupied and private rented accommodation through grants and loans or statutory action. This could be roof and wall insulation or adequate heating to reduce fuel poverty and to make a home safe and habitable. 58 homes improved during 2010/11.
- Housing Advice & Mediation - the Council helps many households to remain in their homes through help with debt advice, mediation with landlords/lenders or neighbours and housing benefit advice. 294 households assisted 2010/11.
- Accessing the Private Rented sector - the Council assists households to access the private rented sector through provision of rent and deposit loans, matching prospective tenants to landlords and general advice. 129 households assisted in 2010/11.
- Supporting the Private Rented Sector through advice to landlords, schemes such as Letstart and regulation
- Home Ownership Initiatives - the Council supports a raft of initiatives to assist prospective owner occupiers to purchase their own home through shared/fixed equity products allowing an occupier to purchase as little as 25% of a home to 80% of a home depending in their income. This is through New Build Homebuy, Homebuy Direct and Firstbuy equity schemes. 42 households helped into affordable home ownership.
- Underoccupation Initiatives - The Council encourages existing social tenants whose families have left home to move to smaller accommodation. This frees up larger accommodation for those that need it, solving two families accommodation needs. The Council offers underoccupiers financial assistance to move and works with Registered Providers to deliver schemes such as The Rowans at Crowborough that are primarily designed and targeted to social housing under-occupiers. 8 households were helped to downsize accommodation, freeing up larger family homes during 2010/11.
- Affordable relets - There are approximately 3100 Council homes and 1700 Registered Provider homes in the District which has seen an average of 255 general needs relets per year (based on last three years).
- Increasing supply of housing & affordable housing through bringing empty properties back into use. 80 empty homes were bought back into use in 2010/11
- Redevelopment & remodelling of existing social housing that does not meet current needs and demand. 64 new homes planned on redundant housing schemes to complete 2013/14.
- Use of Council land for new affordable housing through a Registered Providers or Council new build. 39 homes completed on previously owned Council land in 2010/11.
- Provision of new affordable housing by Registered Providers through section 106 planning obligations and 100% affordable housing sites eg rural exception sites (excluding shared ownership counted above & homes built using Council land above). 151 affordable homes for rent completed in 2010/11.

Appendix B

In conclusion due to high housing costs and low earnings, there is a considerable need for affordable housing in the District. There is a recognised shortage of affordable housing in the District - approximately 7.9% being affordable of the total housing stock. In recognition of the affordable housing need the Council has developed policies in the emerging Core Strategy to increase the supply of affordable housing by encouraging exception sites and requiring 35% affordable housing contributions on sites of 5 homes or more. However, as can be seen there are more ways in meeting housing need than simply building more homes; using the existing stock more efficiently, embracing new initiatives and providing the right advice to households can also help meet the housing needs of the District.

