

## 9th Sept 2016 Nus Ghani Hailsham Surgery

This was an opportunity to ask again the questions that were posed to her on Uckfield FM on 2nd Sept. Namley:

“””

Wealden District Council has no 5 year land supply plan and no finalised Local Plan (unlike neighbouring authorities). Until these plans are submitted to Government, Developers have free rein to grab land in Wealden villages for house building. How did WDC get into this mess?

“””

Her answer was that she was meeting WDC that afternoon together with SWOT to discuss the issue.

Further emphasis was made to her on the threat of over-development in East Hoathly: the proposals that will double the size of our village; and infrastructure challenges the village has today (utilities, health, education, transport).

Information handed to her:

1. The Hesmond Plan for 211 homes
2. The Bradford Plan (approx 140 homes)
3. The ‘landgrab’ map (see category ‘Maps’)
4. House of Lords Economic Affairs committee releases report on ‘building more homes’ (see category ‘CPRE’)
5. Statement 3 covering objections guided by Sajid Javid’s blocking of the Buckinghamshire houses over landscape impact.
6. Statements 2 & 3 are damning summaries from SWOT on WDC planning activities.

A parting invitation was made to her to come and visit us in East Hoathly and take a walk around our beautiful village. She replied that she had visited the village *just the other day*.

## **Statement 1**

Briefly, the Council has decided:

1. Not to review the Core Strategy (CS) as required by the examining inspector, but to compile an entirely new local plan despite the CS only being adopted in 2013.
2. To entirely withdraw the Strategic Sites Local Plan in May 2015, rather than include an amendment to one strategic site in Hailsham as requested by the inspector.
3. Not to produce the Delivery and Sites Allocation Local Plan, a fundamental part of the local plan .
4. To backdate the start of the new local plan to 2013, despite there being in place a current, adopted, NPPF compliant Core Strategy.
5. To accept a Strategic Housing Market Assessment containing major errors that result in the inflated OAHN of 735 houses/year.
6. To produce a five year land supply (5YLS) paper that grossly underestimates the actual land supply position

The result of these actions is to create practically a perfect storm resulting in the almost total inability of the Council to refuse most housing planning applications. This results in a totally unsatisfactory developer led situation.

The Council has recently published its 5 year land supply as at 31 March 2016. This document contains errors in both the numbers and the analysis. When corrected, the document would demonstrate that the Council does have a 5YLS. Thus, you should be able to use the current Core Strategy when you are considering applications, rather than follow the incorrect officer advice that the relevant housing policies are out of date. With one or two exceptions, most rural authorities work very hard and take, where necessary, a very imaginative approach to be able to demonstrate a successful 5YLS. However, not Wealden, who appear to gone out of their way to show that they don't have a 5YLS.

The current completely developer led situation that several of you complained about at PCS on 21 July is likely to continue for several years. The advice you received that it would be ameliorated once the new local plan is adopted is not correct. There will only be an improvement if the Council is prepared to re-examine the incorrect SHMA and take a more balanced approach to calculating the 5YLS. Neither the Leader, CEO, Portfolio Holder for Planning & Development or any planning officer appear to be willing to make any changes. Therefore, if you are concerned about the amount of green fields lost to development with all the resulting related issues, please hold your Council to account.

I have recently been made aware that a critique of the SHMA was submitted to the Council in December by a group of concerned residents. I attach a copy of this critique and although it is quite long and detailed, would urge you to read it. The content remains highly relevant.

Do you have any doubts on the Council's 5YLS position or the housing numbers proposed in the SHMA? If so, please will you challenge the Council now, before too much cost is expended on preparing a new local plan and too many more applications "have to be approved due to a lack of a 5YLS". The Council appears not to want to engage with members of the public when they raise their concerns, so I implore you to fulfill your function and actively challenge on behalf of the District's very concerned residents.

I acknowledge that unfortunately, some of you are happy with the status-quo, but I hope that the majority of you are not and do not wish to see Wealden's green spaces needlessly urbanised. Please take some action, as further inaction will result in continued despoilation of our rural surroundings

## **Statement 2**

Wealden has published (attached) a new 5YLS document that shows that they only have a 3.96 year land supply.

To achieve this figure, they have estimated that they will build 3,509 houses in the next five years against a requirement of 4,435 houses.

This 4,435 requirement has been calculated by using the 735 houses/year OAN and by backdating the new plan to 2013, this creates a 549 house backlog. Wealden has used the Sedgefield method to eliminate this backlog

In addition, Wealden has not counted any windfalls in the numbers of houses to be built.

By making just one change to the analysis, I can make the 3.96 years into 4.96 years. This change is one recommended by the inspector who found the Lewes plan sound earlier this year. His point was that any housing backlog should be derived from the housing target in place at the time, not by backdating the new target. Using this method, Wealden's 549 house backlog becomes a 306 house surplus which can then be deducted from the target. The revised target then becomes 3,537 houses, which is only 28 houses short of a 5YLS.

I think that the extra 28 houses could be easily found if Wealden wanted a 5YLS. They could legitimately include some windfalls given their past record of windfall delivery, or they could take a slightly different view of the 3,509 houses they assess will be built over the next five years.

In the second page of their document, they have listed all the large sites where they consider 1,975 of the total 3,509 houses will be built. Taking just one site, Site G Uplands Farm, they have included the 82 houses granted permission in 2013. However, earlier this year, a revised application was granted permission for 183 houses. If this site starts delivering houses as Wealden has indicated in 2018/19, then it should build at least 150 houses by 2021. This would then make the 3,509 total 3,577 houses, equivalent to a 5.06 year land supply.

I've noticed that two other large sites (Land at West Uckfield and Land at East Hailsham) are showing a much reduced delivery in this 31 March 2016 land supply document than in Chris Bending's evidence to last August's Oaklands inquiry. Both of these sites have slipped back two years reducing the housing supply by at least 242 houses. The slippage may be real, but it may not be.....

Another of the large sites at Stone Cross is shown as starting to deliver houses in 2017/18. However, work started in the summer of 2015 and I bet that some of the houses will be occupied before the end of this year. We may find that the delivery rate of the 1,975 houses in this table is pessimistic in terms of both numbers and timing.

Nothing in the new document has led me to change my opinion that Wealden has engineered a situation where they do not have a 5YLS. I feel that were they minded to achieve a 5YLS, they could easily produce legitimate figures to demonstrate this position.

### **Statement 3**

The following objections to the Hesmond and Bradford plans are guided by some of the reasons given by Sajid Javid in his blocking of the Buckinghamshire houses over landscape impact:

1) Both plans fail to comply with the core planning principles of the National Planning Policy Framework to recognise the intrinsic character and beauty of the countryside, to conserve and enhance the natural environment and to reuse land that has previously been developed. Both developments are of a scale and nature on a Greenfield site in the open countryside, which would result in the loss of best and most versatile agricultural and stud land. The developments would cause harm by the significant adverse visual and landscape character impact on the area of the development sites and their surrounding valued landscape.

2) From both plans, it is not considered that the developments could take place without having a severe impact on the existing highway network and it has not been proven to promote sustainable transport or conform with the strategic objectives to reduce congestion, inconvenience and hazards on the local highway network and therefore, would fail to accord with the advice contained in the National Planning Policy Framework.

3) The proposed developments do not seek to provide any dedicated employment land and as such, makes little contribution to the job needs of its population or the wider area exacerbating problems of out-commuting. The absence of any employment land in the mix of uses would not help to secure economic growth and weighs against the sustainability credentials of the scheme and would fail to accord with the advice contained in the National Planning Policy.

4) Further observation of both plans questions the provision of 35% affordable housing on site, acceptable levels of education provision, leisure and equipped play provision, community facilities, environmental standards and necessary infrastructure either through on or off site provision or financial contribution.