

The Rt. Hon Stuart Andrew MP
Minister of State for Housing
Dept for Levelling Up, Housing and
Communities
Fry Building
2 Marsham Street
London SW1P 4DF

Working Group against Over Development
c/o Clerk to Chiddingly Parish Council
Springwood
Back Lane
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East Sussex
TN21 0QA

3rd April 2022

Dear Minister,

Members of the Chiddingly led Working Group against Over Development watched with great interest the Westminster Hall debate on planning permission and the calculation of housing need in Wealden on 1st March 2022.

This working group has the support of 38 of the 42 parish and town councils within Wealden so far. Many are represented by The Rt Hon Nus Ghani MP and others represented by The Rt Hon Caroline Ansell MP, The Rt Hon Huw Merriman MP and The Rt Hon Maria Caufield MP. The debate was also watched by residents of neighbouring districts who are in the same invidious position as Wealden because of the quantity of housing they are being demanded to deliver by an untested algorithm which is failing to deliver the type of local housing that is really needed. Furthermore, the algorithm is placing unacceptable demands on local communities because of the lack of public infrastructure to accompany the quantum of development, most of which requires high carbon travel and the destruction swathes of agricultural land in rural Sussex.

There were a number of issues touched upon in that debate about which we would like further clarification from you. There were also some significant issues which were not discussed and to which we seek answers.

You talked about the importance of having an up-to-date local plan, yet, as things stand, this will be based on out-dated population projections despite the ONS recommending that users of their data should always use their most recent releases. The explanation that the use of the 2014 projections provides stability to LPA's is ludicrous when both the household projections and affordability ratio change on an annual basis.

Q1. Various Ministers have repeatedly said that the DLUHC is going to change the method of calculating housing need. When is that coming?

Q2. In the meantime, in a democratic system how can any community get behind a draft local plan based on a "one size fits all" formula which is not delivering the type of housing to meet local need and which is based on out-of-date information?

Q3. Why the hesitation to make the standard method advisory? Doing so would allow many local authorities to get on and produce their plans on up-to-date local evidence-based factors and be acceptable to local electorates.

Background to questions 1-3: Ms Ghani went into great detail on the impact of using out of date projections. The 2018 ONS data projects a 10% increase in Wealden's population all of which and more (the natural population is declining) will come from other areas of the UK in the 20 years to 2039. However, your top-down algorithm results based on the 2014 projections imply a requirement for the population to increase by 28% (Source: Wealden Local Housing Needs Assessment August 2021) in order to fill the houses being built. This does not reflect local circumstances. Complying with the standard method will inevitably result in a loss of green fields, greater congestion on the roads resulting in yet more inefficiencies for business and employees, longer journeys to schools and doctors because of no concomitant increase in public transport. This is why local communities are finding the demands so unacceptable.

You reminded your audience how the housing delivery test works but did not address Ms Ghani's concerns about the implications of the test result in her constituency.

Q4. The standard method is not delivering the type of lower cost one- and two-bedroom units in the quantity required locally and in sustainable locations close to public infrastructure. This is what Nus Ghani is so concerned about. Instead, developers are delivering larger, more profitable executive housing built on agricultural land. Can the standard method ever be reformed so that it can deliver local housing requirements in sustainable locations?

Q5. To remove the perverse incentive which encourages land owners and developers to build out slowly whilst seeking yet more planning consents on unsustainable green field land, why not allow LPAs to include all unbuilt permissions in their 5-year housing land supply?

Q6. Or do you not trust the LPAs or do you not trust the developers to build what is required locally?

Q7. The one size fits all method is not delivering the outcomes required locally so why do local communities have to accept the Housing Delivery Test's perverse outcomes - the less developers build, the more the planning balance is tilted in their favour and the more planning permissions they obtain on yet more green fields in unsustainable locations?

Background to questions 4-7: Parish and town councils are regularly reassured by Wealden's planning team that they are doing everything possible to help developers build out as quickly as they can. Inevitably the majority of Wealden's sites are on agricultural land often remote from adequate road, power, water, sewage infrastructure (although the latter is no constraint to Southern Water who we now know routinely discharges untreated sewage into any convenient waterway).

Even when sites are ready, the Head of Policy and Economic Development at Wealden District Council admits that the speed of build out is controlled by the developers own need not to upset the local housing market. Ms Ghani evidenced this by the 7600 homes which have permission but which have yet to be delivered. This is equivalent to 6 years' worth of the standard method's expectation for 1221 dwellings a year but local communities are told that Wealden only has 3.66 years land supply because of the slowness of delivery. It is a travesty to sanction authorities for slow delivery when this rate is under the absolute control of the developers. As Sir Oliver Letwin found in his review, the build out rate is influenced by the rate of market absorption with the business model of all developers unwilling to lower prices to speed this up.

The backlog of unbuilt permissions thus does not stop a continuing deluge of more planning applications for yet more housing on yet more green fields which also will not be built in a timely fashion and in all likelihood will not be required in the foreseeable future but will blight our land. In paragraph 5.41 of Sir Oliver Letwin's draft analysis of build out rates published in June 2018 he did acknowledge that land owners do seek to speculate in exactly this way and he sees this as a serious problem for the planning system. Wealden is increasingly a prime example of such speculation.

In any other circumstances many of these applications would not receive planning permission from Wealden or the Planning Inspectorate because their locations are remote from everyday facilities and dependent on carbon intensive car transport and with little likelihood of ever being served by regular public transport. Again, local communities are also finding this impossible to accept.

Time and again parish and town councils see amendments to major planning applications seeking to reduce the true social affordable housing content of a particular site because developers' accountants are swifter handed than Wealden's planning officers.

UK Land Registry data states that the average sale price of new homes in Wealden is £472,629 (Oct 2021) whilst the ONS shows the median new build costs £390,000 (Sept 2021). Both of these are significantly higher than the £108,148 deemed affordable in Wealden when using the ONS workplace earnings for September 2021. The new homes being delivered in Wealden are making affordability worse not better.

The standard method does not deliver what it is meant to in Wealden despite the council's best efforts. The community is being penalised by increasing urbanisation across the district but without the benefit of a developed public transport network. The local planning authority cannot control the situation.

Q8. Having to build homes for neighbouring authorities is yet another result of the standard method which is difficult for local communities to accept. Why is there is no common-sense check that the output from the standard method formula is proportionate and acceptable for each local authority in the real world?

Q9. Ms Ghani highlighted the unfair strains such a quantum of housebuilding is placing on Wealden because of the lack of infrastructure accompanying it and Wealden's own admission that there has been an historic lack of spending on infrastructure to accompany what has already been built. How can you continue to demand the quantum of housing demanded by the algorithm in such circumstances?

Background to questions 8 and 9: Wealden is a rural district and because of that it has not had the decades of infrastructure investment of other more urbanised districts. Yet the scale of development demanded by the algorithm is equivalent to doubling the number of dwellings in the 3 biggest settlements in Wealden, namely Hailsham, Crowborough and Uckfield or, as Ms Ghani stated, that there will be one new home for every 2.8 which exist today and will require a 28% increase in the population to fill those homes according to consultants Icen Projects.

This is a massive experiment in unfunded social engineering for a rural district where there is no genuine useable alternative to car dependence and which will make all our communities even more traffic dominated than they have already become today. Our Highway Authority stated in the now withdrawn 2019 Wealden Local Plan, that even with the planned highway improvements, they would be unable to maintain the status quo in terms of congestion and journey times. They

maintained that in order to sustain the additional 14,000 houses then envisaged- now potentially 24,000 homes required by the standard method in the replacement plan- that a modal shift by the current population will be necessary requiring travel to be by foot, bicycle or public transport. Clearly, for a largely rural area, for most, this is not possible. Our community sees lip service being paid to sustainability, not building on green fields and reducing dependence on carbon intensive travel.

The £5m Wealden collected in CIL monies in 2020/21 is earmarked for improvements to two roundabouts to alleviate existing traffic congestion, not to accommodate the future development envisaged by the standard method. Traffic avoiding the congested main routes in the district head towards the network of single-track rural lanes, none of which have ever been designed to cope with such traffic volumes meaning that no corner of the district is untouched by development yet no money is available to the highway authority to ameliorate any of these consequences.

There are many communities across all of Sussex who are extremely concerned about what the future is looking like and what it will mean for the environment and for their children.

Minister, you said you have heard concerns from many local authorities “loud and clear”. We urge you to get on with the reforms which will make local plan making local again.

We look forward to your visit to Wealden and heartily recommend the train to Uckfield because the journey will take you through some of the most beautiful, ancient and uplifting Sussex countryside of which we are so protective and proud.

Please listen to the strength of feeling of so many of us in Wealden about the inequity of your government’s planning policy. By 3rd April 2022 in total 38 out of a total of 42 Wealden parish and town councils have formally agreed to join our initiative against overdevelopment. They are the following: Alciston, Alfriston, Arlington, Berwick, Buxted, Chalvington with Ripe, Chiddingly, Cuckmere Valley, Dane Hill, East Hoathly with Halland, Fletching, Forest Row, Framfield, Frant, Hadlow Down, Hailsham, Hartfield, Heathfield and Waldron, Hellingly, Herstmonceux, Horam, Isfield, Laughton, Little Horsted, Long Man, Maresfield, Mayfield and Five Ashes, Ninfield, Pevensey, Rotherfield, Selmeston, Uckfield, Wadhurst, Warbleton, Wartling, Westham, Willington and Jevington, and Withyham. Three of the four remaining councils may join us soon.

Yours sincerely,



Miranda Dart

Chairman, Laughton Parish Council, On behalf of the Working Group against Over Development

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cc. Rt Hon Nusrat Ghani MP