

WORKING GROUP AGAINST OVER-DEVELOPMENT

Wealden District Association of Local Councils

c/o The Barn, Stream Farm
Dern Lane, Chiddingly
East Sussex BN8 6HG
United Kingdom

Tel: 01825 873 124
Mob: 07802 651879

2nd March 2023

Dear Ms Ansell, Ms Caulfield, Ms Hart, Ms Ghani and Mr Merriman,

You may recall the virtual meeting that was organised on the 15th November 2022 between WGOD; representatives of local councils from Rother and Lewes; and yourselves. In that meeting we raised our concerns regarding the excessive housing development ongoing in Wealden, Rother and Lewes and the consequential loss of green space and further degradation of our already overstretched services. Our concerns mirror those of our residents where for example in Wealden, development has averaged 746 dwellings/year over the last five years. But this level, is far below the number set by the standard method which this year, requires 1,200 dwellings/year. As you are well aware, this standard method figure features in the 5YHLS and HDT as well as the new local plan.

At the November meeting, we were heartened by your explanation of the amendments to the LURB being proposed by a group of MPs led by Theresa Villiers. The amendment of particular interest to us, NC 21, was intended to considerably reduce the impact of the standard method and permit planning authorities to make a rational assessment of their housing need via alternative means should they so wish. Unfortunately, a compromise was reached with the government and Ms Villiers withdrew NC21 in return for the ongoing consultation to changes to the NPPF. We enclose for your information WGOD's response to this consultation in which we have recorded our concerns that for the present, the use of the standard method continues.

Although the current consultation indicates that the government is proposing some changes this Spring to the NPPF and PPG, it is currently not proposing to change the standard method itself. We acknowledge that the use of the standard method will not be mandatory, but LPAs are required to demonstrate exceptional circumstances before an alternative method can be used. Unfortunately, the two examples given of meeting the threshold of exceptional circumstances viz. for islands, or for large student populations, are not applicable for any LPA in East Sussex. Therefore, we do not consider that Wealden for example, will be able to demonstrate exceptional circumstances and thus will be required to continue to use the standard method to assess its so-called housing need.

This year the housing need in Wealden derived from the standard method is 1,200 dwellings/year, which for a 20 year plan life would provide an increase in the housing stock of a simply enormous and totally unsustainable 34%. In the release of the 2018 household projections in 2020, ONS stated that over the next ten years, that the number of households in England is anticipated to increase by 7.1% (or 0.71%/year). We therefore question why in a district with little overcrowding or suppressed households, that our housing stock is required to increase by 1.67%/year, being 2.35 times the national average increase. Quite conveniently for those who support overdevelopment, quality of life is not a matter that is considered in planning as clearly, a 30%+ increase in population in 20 years across Wealden would dramatically change the character of the district and considerably degrade the existing resident's quality of life.

Therefore, WGod is very concerned that without NC21, the LURB fails to address the considerable shortcomings in the iniquitous standard method. The government has said that it is willing to look again at the standard method after the release of the 2021 Household Projections in 2024. But as the government requires all LPAs to have an up-to-date local plan by December 2023, this standard method review comes far too late. It is conceivable, that this was by design.

Thus, in their new local plan, Wealden will be required to use the existing standard method which as you well know, is based on the totally out of date 2014 Household Projections and an affordability factor which utterly fails to address affordability and simply requires a massive increase in housebuilding.

It is now almost a year since we held a meeting in Horam attended by councillors from the vast majority of Wealden town and parish councils (Wealden electorate 130,000) at which they shared their grave concerns about the ongoing levels of overdevelopment in the district. The councillors felt that their council's concerns were not being listened too and welcomed the opportunity to collectively work towards the abolition of the standard method. Yet, unfortunately, the standard method remains as the mechanism for Wealden to calculate their housing need in their new plan, a draft of which is anticipated to be published shortly.

In summary, we were heartened by your sympathetic hearing of our concerns last November where you suggested that these concerns would largely be ameliorated by Theresa Villiers' NC21. However, we are failing to see how the spirit and intent of NC21 is being reflected in the proposed NPPF changes. As things stand, it is difficult to see how the proposals address the widespread concerns of your constituents. The district is being subjected to massive housing growth but without the infrastructure spending to accompany the projected rise in the population of c30% that will result from the occupation of all the houses being built in rural areas, small market towns and villages where there is already a historic deficit in the provision of infrastructure. This is surely not levelling up working as intended. Residents today have to endure car dependency and increasing congestion whilst seeing that despite the quantum of

development that most average hard working people who live locally cannot afford the new dwellings nor is there the infrastructure being provided - public transport, healthcare, sewage, the list goes on - that should be accompanying this huge unwanted social change which is being forced on East Sussex by the insentient standard method.

Therefore, we need your help.

Yours sincerely
Cllr. Nikos Mikelis

A handwritten signature in black ink, appearing to read 'Nikos Mikelis', with a long horizontal line extending to the right.

Chairman WGOD, and
Chairman Chiddingly Parish Council

Encl. WGOD response to the NPPF consultation

cc Wealden District Association of Local Councils
cc East Sussex Association of Local Councils
cc Rother Association of Local Councils
cc Plumpton Group