

12th October 2020

Ref: Planning for the Future

Dear Huw,

We are writing to you because we are strongly opposed to the new planning system proposed in the white paper / 'Planning for the Future' which is currently in consultation. The national press is starting to feature articles about the new proposals and it is good to see that there is a growing understanding of the major issues in the proposals. The article on your website is encouraging and we appreciate that you are taking an enquiring approach with the Secretary of State.

We therefore wish to bring to your attention the strong feelings of opposition to the Government white paper 'Planning for the Future' being voiced in Heathfield... because the issues which already prevail in Wealden are likely to become much worse should the new system become law. As you will know, Wealden has over 50% of its land area designated protected landscapes of the High Weald AONB and the Pevensey Levels, a large area is within the protection zone for the Ashdown Forest and in Heathfield, which is surrounded by the AONB, we have the listed Heathfield Park with listed gardens and an SSSI zone.

Greenfield unprotected land which is available for housing development is very limited and given the predominantly rural history of the Wealden and the lack of heavy industry or other large commercial activities (major companies with office buildings) the availability of brownfield sites is also limited. Consequently there has been increasing pressure on the High Weald Area of Outstanding Natural Beauty with a very high proportion of Wealden District Council planning approvals being for sites in the AONB.

Heathfield lies in the heart of the AONB and since 2015 has been plagued with many housing development applications most of which were approved fairly rapidly ... and we are sure you will recall visiting the StopVinesCorner group and discussing with us the Vines Corner application for 230+ homes on three parcels of land all in the AONB but which thankfully was withdrawn.

You may recall that the group is led by me, Sarah Bushnell and my colleague Michael Gadd. Our objective is to conserve and protect green spaces in and around Heathfield and we have rebranded the website as 'HeathfieldGreen.Space'. We are aligned with SWOT (Save Wealden from Overdevelopment Team) and with WASP (Wealden Alliance for Sustainable Planning). We are providing space on the website for each area of Heathfield & Waldron Parish, we are including information on all active planning applications in the Parish, and we have been making people aware of the 'Planning for the Future' proposals and our responses.

You can find our responses to the consultation here: <https://stopvinescorner.co.uk/hgs-comment>

Our view is that the proposals comprise a new layer of centralised bureaucracy ... working top down ... which states that it will 'release' land for developers, implement standard designs and 'pattern books' for homes, employ people to oversee and progress-chase that LPAs (Local Planning Authorities) approve the numbers of homes required ... and cut out democracy which is referred to as 'red tape'. Indeed it can be argued that the thrust of it is to make things easier for developers and builders and effectively stifle public involvement and comment / objection to inappropriate development.

We have a comprehensive set of objections to 'Planning for the Future' which we have set out under the following headings:

1) A New Planning System Is Not Needed

We do not believe that the Planning System is 'broken' or 'unfit for purpose' ... however we think that more could be done by the Government to improve things:

- Stronger and clearer protections for protected landscapes and AONBs which suffer from being 'second class' to the national parks which have their own planning authority whereas the AONBs fall under the Local Planning Authority with local council funding which heavily limits the weight of their consultee authority
- The land area of AONBs should be truly protected and taken out of the housing numbers 'equation'
- Funding and incentives should be available to encourage Parish Councils to make Neighbourhood Plans ... currently there are currently only 2 such plans in Wealden
- Incentives (positive and negative) should be placed on the building industry to use brownfield sites rather than the preferred greenfield sites which are cheaper and easier to develop
- Incentives (positive and negative) for the building industry to 'build out' all the homes relating to an existing approved planning application within a rapid given timescale and less than the current 3 year period

- Incentives should be placed on the building industry to convert the retail and office space being made redundant by COVID and the change in people's buying and working habits ... for residential use .. including out of town malls which would need bus services and shuttle services to nearby town/s and rail station
- Funding and incentives should be expedited to enable Councils to compulsorily purchase empty homes and bring them back into use

In support of the current planning system ... here is an extract from an article by the Local Government Association dated 20th February 2020 which states:

The number of planning permissions granted for new homes has almost doubled since 2012/13 with councils approving 9 in 10 applications'.

It continues:

'Alongside the Government, councils recognise the shortage of housing and the need to build more homes'.

'However, the LGA said the backlog of unbuilt homes shows the planning system is not a barrier to house building. It is calling on the Government to use its forthcoming planning white paper to give councils powers to take action on unbuilt land which has planning permission'.

'This includes making it easier to compulsory purchase land where homes remain unbuilt, and to be able to charge developers full council tax for every unbuilt development from the point that the original planning permission expires'.

'With the right powers and funding, the LGA said councils can play a leading role in helping the Government tackle our national housing shortage'.

2) Unbuilt Homes and Empty Homes

These issues lie with lack of Government/s action over some years ... there seems to be unwillingness to 'rock the boat' with the building industry and failure to vigorously tackle the issues of applications for homes being approved but not being 'built out' ... as well as failure to address the scandal of empty homes.

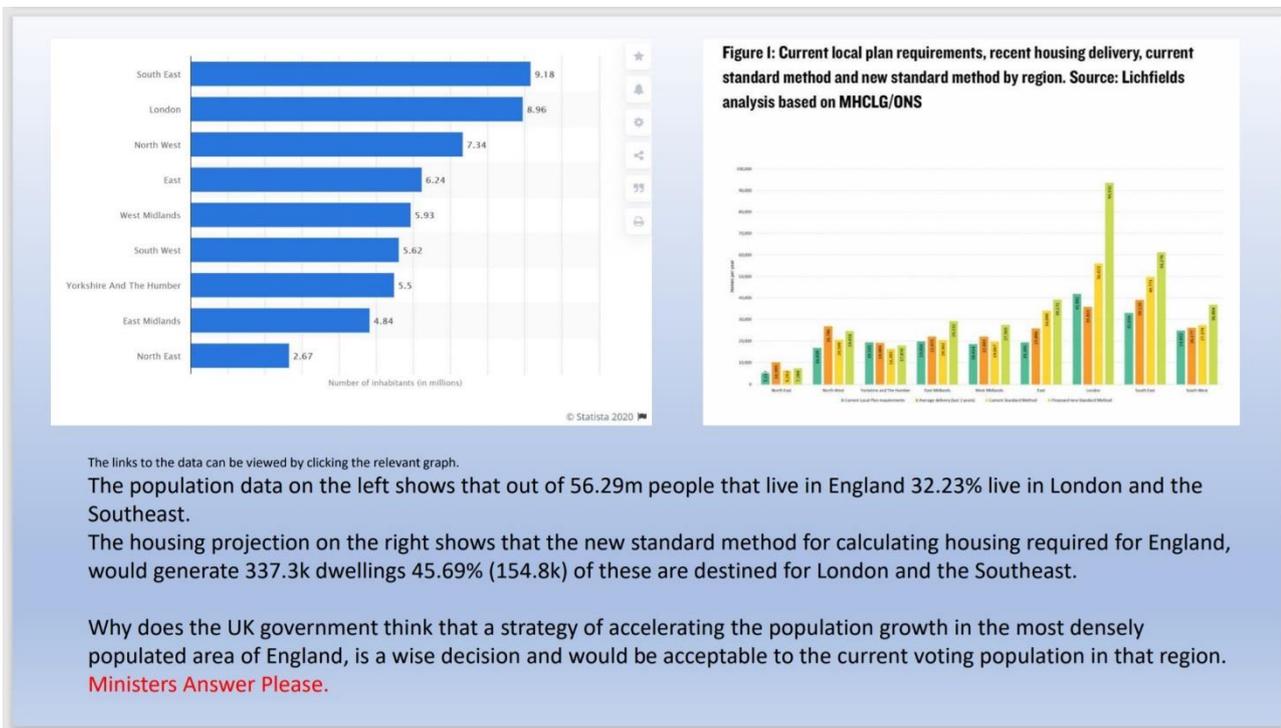
Fact: There are 1,000,000 homes (source: Local Government Association article 20th February 2020) approved by Councils / LPAs but not yet built ... Why is the Government allowing this to continue ? Why is the Government failing to put real pressure and control measures on the building industry to get those homes built 'Now' ?

Fact: As at 2019 there are 648,114 homes lying empty in England which could be brought into use. Why is this being allowed to continue ? Why is the Government failing to put pressure on the owners / compulsorily purchase empty homes and re-purpose them for the housing pipeline ?

3) The Housing Algorithm - Level Up or Concrete Over

Across the UK there is widespread objection to and rejection of the Government's housing algorithm which has produced some bizarre and inexplicable demands for housing numbers and the distribution in England.

It demands less housing in the North and Midlands ... and more housing for rural areas and the already largely over-developed South East... which does not support the Conservatives 'Level Up' election commitment. Please refer to figures in the attached graph. [Source can be found here.](#)



4) The Myths of More Land, Cheaper Homes, More Choice and Lower Land Prices

Many of the assertions and positions in 'Planning for the Future' are at best misleading ...

Planning for the Future states that the amount of housing space for the money is greater in countries such as the Italy, Netherlands and Germany as if they were all similar sizes and populations and as if the prevailing rules about mortgages, financial situations and other key influencing factors were the same across those countries.

There is a lot more to consider but at a basic level the UK has less land area but more people to accommodate and British people are typically pro home ownership ... these are some of the factors that contribute to high land prices in the UK with climatic and business factors driving higher populations, higher land prices and more expensive homes especially in the South East and London.

With this in mind we wish to highlight the many statements in Planning for the Future which collectively give the strong impression that there is unlimited amounts of land 'out there' which only Planning for the Future can unlock and that by 'releasing' more and more land then land and homes will become more affordable / cheaper even in the most expensive areas.

This unrealistic and untrue ... but the following extracts show repeated emphasis on the theme of more land being made available and which Planning for the Future strongly implies will be conjured up by Councils which will be progress-chased and pressured under the new system to provide the land the algorithm says is needed.

In section 1.12 it says: "We wish to increase the supply of land available for new homes where it is needed' ... and in 1.20 it states: 'to ensure more land is available for the homes and development people and communities need,' ... it continues: 'A new nationally-determined, binding housing requirement that local planning authorities would have to deliver through their Local Plans. This would be focused on areas where affordability pressure is highest to stop land supply being a barrier to enough homes being built. Then in 1.23 it says: 'And with more land available for homes where they are most needed, and in 1.24 it says: 'A greater amount of land available near to workplaces',

The South East being a small part of England with areas such as Wealden being blessed with large areas of protected landscapes such as Green Belt and Areas of Outstanding Natural Beauty ... however they heavily constrain the amount of green field unprotected land preferred by developers and builders.

Fact: Developers and building companies exist to make profits for the shareholders, and they will always prefer to develop in areas which have higher land prices and on greenfield sites which are cheaper to develop ... to maximise higher profits. Housing will not be cheaper... because developers will ensure that the numbers of homes made available at any one time can be sold within a given timescale. They simply will not build 'lots' of houses ... to fulfil the statements (or wishful thinking) in Planning for the Future ... or to provide choice and low prices to buyers. Builders will build the number of homes that affords them the highest profit in return for their investment.

Fact: If houses do not sell then Developers / Builders 'mothball' the site and wait until the market improves. We have new development sites in Heathfield and elsewhere in Wealden District where building has been stopped because houses are not selling because there already is too much choice and availability exceeds buyers which is a situation that does not suit developers and their shareholders.

5) Impacts on Rural Areas, Green Belt and Areas of Outstanding Natural Beauty

The High Weald AONB is a medieval landscape of wooded, rolling hills studded with sandstone outcrops, small irregular-shaped fields, scattered farmsteads and ancient routeways. The interconnected wildlife habitats and wildlife corridors are optimum habitats for the many BAP species (Biodiversity Action Plan priority species) this a landscape of High conservation importance.

Fact: Wealden has over 50% of its land protected as High Weald AONB and Pevensey Levels and large areas are within the range of protection for the Ashdown Forest SAC (Special Area of Conservation). In Heathfield we have a SSSI site at Heathfield Park as well the town being surrounded by the AONB. Surrounding villages are 'washed over' by the AONB. There is simply not enough greenfield non-protected building land available to support large scale housing development/s which will come with the new planning system proposals.

Protected land can be found on the [DEFRA Magic Map](#)

Fact: The High Weald AONB has High landscape value with no capacity to accept change such as development. The landscape cannot be replaced once it is built over ... when it's gone it's gone along with the wildlife and habitats ... for ever.

Fact: Increasing housing development in rural areas will destroy more wildlife and wildlife habitats ... this is in contravention of the European Habitats Directive which says that wildlife habitats should be protected and their loss prevented.

The NPPF (National Planning Policy Framework) says that the AONBs should have the strongest protection (from development) but in practice the AONB paras have proved to be less than strong enough to truly protect the AONB against aggressive speculative development ... that is certainly the case in Wealden.

Fact: A representative of Parker Dann at a Parish Planning Committee meeting earlier this year spoke regarding the application to demolish Laurel Cottage a Wealden Artisan cottage in Broad Oak and build two large detached houses ... located outside the development boundary and inside the AONB. The application had been opposed by local people in Broad Oak over nearly 2 years and they based their objections on many valid material planning grounds. But the words used by Parker Dann were to the effect 'what needs changing' and that they would keep bringing the application back until it was approved ... with no respect for the objections, the value to the neighbourhood of a Wealden artisan cottage or that the property lies within the AONB. It was approved by the WDC case officer some weeks later.

An added issue is Wealden District Council planning department has stated that there will be development in the AONB and we have frequently heard the Officers instruct Planning Committee/s that the lack of a 5 Year Housing Land Supply and the national housing need outweighs the value of and protection for the AONB.

Fact: The number of homes in previous WDC Local Plan (withdrawn 2019) was 14,228

Fact: The number of homes for Wealden District circulating in the public domain and based on 'Planning for the Future' are very worrying indeed... being an increase of nearly 4,000:

- 17,985 homes to be built over
- 15 year Plan period, which means
- 1199 Annual Build Rate

Fact: 86% of planning applications (source [East Sussex in Figures](#)) approved by the two Wealden District Council Planning Committees and Planning Officers are for development/s on greenfield sites mostly in the AONB.

Fact: There is currently an application for nearly 100 homes in Heathfield (WD/2020/0170/MAJ) for another greenfield site in the AONB. Details can be found here:

<https://planning.wealden.gov.uk/plandisp.aspx?recno=148737>

Such a proposal should not be likely to be approved ... but the weakness / greyness of the NPPF, the pressure that the Government is putting on Wealden District Council to deliver ever increasing numbers of homes and the possibility that a Planning Inspector may approve it on appeal ... is threatening yet more loss of the AONB.

6) Population Growth in Wealden is Static

Fact: There is zero growth (Births vs Deaths [East Sussex in Figures](#)) in Wealden District population ... the increase in numbers is due to people moving into the District . The statistics present in East Sussex in Figures extracted below showing the population by dwelling evidences this statement.

Dataset: Births, deaths and natural change, 1991-2019 - districts

Data now obtained from ONS mid-year estimate components of change, published June 2020

Geography: Mixed | Year | Gender: All people | Measure: Natural change

Year	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019
Geography											
England	198,049	222,539	233,776	234,344	199,781	209,553	165,101	183,861	156,763	124,584	128,987
South East	27,245	31,602	32,710	32,407	26,489	27,619	20,869	23,809	18,320	14,180	14,627
East Sussex	-1,103	-892	-732	-704	-1,092	-841	-1,427	-1,309	-1,538	-1,824	-1,692
Eastbourne	-112	-124	-47	-39	-207	-88	-224	-214	-292	-426	-369
Hastings	190	172	261	205	260	238	33	82	72	45	77
Lewes	-124	-53	-143	14	-181	-141	-145	-230	-206	-247	-333
Rother	-682	-560	-554	-578	-639	-612	-730	-611	-621	-595	-656
Wealden	-375	-327	-249	-306	-325	-238	-361	-336	-491	-601	-411

Dataset: Population projections by age and gender (dwelling-led), 2018-2033 - districts

ESCC Projections April 2020

Geography: Mixed | Year | Age group: All ages | Gender: All people | Measure: Number

Year	2018	2019	2020	2021	2022	2023	2024	2025	2026	2027	2028	2029	2030	2031	2032	2033
Geography																
East Sussex	554,590	556,970	559,409	562,743	567,039	573,236	578,433	584,967	589,976	593,973	597,678	601,247	604,662	608,423	612,276	616,094
Eastbourne	103,160	103,174	103,374	103,730	103,884	104,199	104,496	104,825	105,113	105,280	105,431	105,569	105,695	105,810	105,925	106,032
Hastings	92,855	93,097	93,219	93,539	94,205	94,935	95,529	96,055	96,485	96,566	96,768	97,092	97,425	97,729	98,021	98,301
Lewes	102,744	103,264	103,844	104,546	105,480	106,575	107,442	108,674	109,583	110,375	111,094	111,501	111,736	112,426	113,153	113,902
Rother	95,656	95,864	96,330	96,865	97,542	98,135	98,565	99,597	100,600	101,514	102,486	103,116	103,715	104,296	104,922	105,547
Wealden	160,175	161,572	162,642	164,063	165,928	169,392	172,400	175,816	178,195	180,237	181,899	183,968	186,091	188,163	190,256	192,312

7) Business and Commercial Impacts of Planning for the Future

Fact: Wealden District is largely rural and semi-rural with no 'heavy industry' or major commercial presence. It supports fruit growing and raising of sheep and beef cattle ... and importantly the beautiful High Weald countryside supports a myriad of micro Tourism and Leisure businesses which depend on people wanting to visit our treasured landscapes and spend their time ... and money in the AONB.

Fact: Wealden High Streets are dominated by small businesses which only require 1 or 2 people ... typically supermarkets employ larger numbers, but they are limited to larger towns which also have light industrial / retail areas. Collectively there is not a great reservoir of jobs to support the 18,000 homes that we are told the Government and Wealden District Council wants built.

The destruction of large areas of the AONB to provide housing will heavily reduce its attractions and drive Tourism and Leisure away ... and with that the micro-businesses which are the lifeblood of Wealden ... will be gone.

We have heard the Prime Minister and others assert that everyone deserves a home ... but not ... we would argue ... at the expense of the loss of protected landscapes and all the livelihoods it supports. One man's right to a home is not a justification to destroy another man's business and make him bankrupt or for that matter to destroy the precious protected landscapes.

8) Impacts and Opportunities of COVID-19

COVID is having a devastating effect on High Streets (everywhere) which were already struggling for years and long before COVID struck. Lockdowns and isolation have accelerated the public's move to internet buying across a vast range of goods and services and it is becoming clear that a significant proportion of people prefer to work from home. All this points to millions of square metres of retail and office space becoming vacant in the months ahead.

Why isn't the Government kick-starting and incentivising the building industry to convert such buildings to

residential use ? This has been done very successfully in Basingstoke in Hampshire where multi-storey office buildings owned by IBM were converted and repurposed into flats ... perfectly situated near to the town centre and close to the railway station. Even out of town shopping malls can be converted and the residential use of some or all of that space supported with bus and shuttle services to local towns and train stations.

9) Building Methods Are Outdated and Not Cost Efficient

There are many well-designed prefabricated buildings available which could be used ... with pre-finished bathrooms and kitchens with wiring and plumbing installed ... and with external coverings which can fit into a variety of environments. These pre-fabricated units can be delivered to site and assembled in days.

Why is the Government and Homes England stuck in the 'dark ages' of conventional house building ? ... using old school bricks and mortar and concrete ... these methods rely on transporting heavy materials to and from site, they are slow, resource-greedy, expensive and environmentally damaging because conventional foundations stir up the ground releasing carbon into the atmosphere. Demolition of conventionally constructed buildings is slow and damaging to the environment.

Pre-fabricated units can be lifted off site quickly and taken away for recycling with minimal upheaval of the ground. Indeed with pre-fabricated buildings there is some chance that land could be restored to 'green field' in the future.

10 Planning for the Future is Undemocratic

Today ... we have some important elements of democracy in the Planning System which allow the Public to comment and support or object to any planning application ... and anyone who has responded to the local plan consultation has a Right to be heard by the Inspector conducting the plan examination.

But the White Paper / 'Planning for the Future' ... clearly states that if the proposals are made law then all land will be designated 'Growth, or 'Renew' , or 'Protect' when the Local Plan and when the public will be able to comment ... but it not made clear as to who can comment and how that would be done.

Thereafter the public will no longer be able to object to what will undoubtedly be wide scale development including what we fear for Heathfield will be major intrusions into the Area of Outstanding Natural Beauty.

Realistically an enormous number of people are not that conversant with technology and need conventional means of communication such as letter or basic email to be allowed in this process. To effectively exclude people because they are not 'tech-savvy' and or too busy or simply not able to be interrupted with communications about planning during the working hours would be undemocratic.

11) Planning for the Future is Discriminatory

I was shocked to read section 6.5 of the White Paper ... Equalities Impacts ... which states :***The Government has heard how the combination of technical jargon and traditional models of community engagement discourages people from having a say on decisions. At the same time, it disproportionately encourages engagement from people from a narrow set of demographic groups - typically older, better off and white. We believe that the voices of those who may benefit most from new development are therefore often the quietest in the planning process.***

This statement is saying that Planning for the Future is not a system for all as it claims... it is a system to which panders to and does not seek to control or discipline the Building Industry and it seems to prefer to attract those belonging to less 'troublesome' demographic groups whom the Government presumably thinks will not oppose Planning for the Future.

This system will exclude busy working people who can't or don't want to be called or messaged about planning matters during working hours and especially it will discriminate against those who have shown the will and the drive to challenge it.

Our group and website is open to all in Heathfield & Waldron ... we actively support anyone or any group which asks for our help and we find that local people from a wide range of demographic sectors are looking at our website and telling us how concerned they are about planning decisions being made and which they know are being driven by the Government and the 'national housing need'.

We are told that in Heathfield people are being put off and intimidated by the jargon-heavy language used by planners, and the sheer weight and volume of material in the Local Plan (the last WDC Local Plan withdrawn in 2019 and covered 10,000 pages) discouraged the majority of people from being involved in the consultation. This also applies to Planning for the Future ... most people simply do not have the time or will to study such a document or indeed to respond to the consultation.

Fact: Recently a planning application for 205 homes and increase the small village of East Hoathly by 63% ... attracted objections from 1000 residents, the parish council, CPRE, English Heritage and Wealden's own Heritage Officer BUT it was approved by Wealden District Council. [More details can be found here](#)

Decisions like this lead to residents saying, "what's the point they won't listen anyway'.

Equally worrying is that the 'Planning for the Future' proposals also seeks to take away the 'Right to be appear and be heard'.

Fact: 'Right to be appear and be heard' is enshrined in law in the Planning and Compulsory Purchase Act 2004 section 20 (6) i.e. any person who has made a representation seeking a change to the plan within the deadline set by the LPA for Regulation 19 consultation responses.

12) Neighbourhood Plans

Last and by no means least ... if the Government really wants to make a difference to the planning system ... it could make Neighbourhood Plans compulsory and provide greater funding and incentives so that Parish Councils will support them. There have been 4 requests to Heathfield & Waldron Parish Council that they start up a Neighbourhood Plan and they refused again in March 2020. They have ample funds but the Council is appears to be more influenced by commercial interests and they are unwilling to invest in a plan which will make a real difference to Heathfield & Waldron residents who have borne the brunt of a feeding frenzy of planning applications since 2015.

In closing ... we feel that that we should emphasise that the impacts of Planning for the Future will be so severe and so unpopular in the South East that these proposals have the potential to be a huge vote loser for the Conservatives.

We are therefore asking you to support Heathfield and all of Wealden... and to give us a strong voice in Parliament. Please oppose 'Planning for the Future'.

Yours sincerely,

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