



To: Rt. Hon Boris Johnson MP  
Rt Hon Robert Jenrick MP  
House of Commons  
London SW1A 0AA

Dear Prime Minister and Housing Minister,

WASP is an Alliance of Planning and Green Space interest groups in Wealden. Our Alliance is not a “build nothing” group but is concerned that development should be appropriate in terms of number and location.

We are writing with regard to the current situation regarding housing, and possible changes to Planning regulations, especially with respect to the district of Wealden, though many of the points would apply across the United Kingdom.

First of all, a word about Wealden:

- It is a district which is composed over 50% of what should be protected Green space – the Ashdown Forest, the High Weald Area of Natural Beauty, Pevensy Levels (RAMSAR site of Specific Scientific Interest).
- It is what many would consider to be a rural district with a number of medium-size towns (Hailsham, Uckfield, Crowborough, Heathfield, Polegate)
- It has a gradually ageing population – Wealden seems to be a popular destination for retired persons with a good disposable income. This is relevant since the price of an average property in Wealden is almost 12 times the average salary in the district.
- The Government recently rejected a proposed Local Plan, which proposed to build 950 houses per annum in Wealden; currently the housing target being set by Wealden District Council as part of their emerging plan is 1225 houses per annum.

What is significant about this is the fact that according to ONS projections on population, perhaps 500 houses per annum would in fact be about right for population growth.

In fact, taking a 20 year projection, the ONS predicts a population growth of around 10.5% for Wealden, while the Wealden planned housing figure would give a growth in the number of properties of around 36%.

So who would live in all those properties?

- Since the rejection of the Local Plan, Planning applications have flooded in, based on the “Lack of 5 year housing supply”; This is a strange notion, since currently there are over 8,000 (around 7 years supply) of properties with Planning permission granted which are as yet unbuilt.
- Developments are being granted where there is completely inadequate infrastructure; the town of Hailsham sees considerable numbers of houses being granted in it’s locality, and yet it is still awaiting junction improvements which were written into the Local plan as essential in 1998! East Sussex County Council cites lack of funding as the reason for this non-delivery of infrastructure.

- Additionally the ONS states that only about 25% of employment required for the (10.5%) population increase can be provided locally, meaning that apart from Pensioners and unemployed, work must be provided either by working from home or commuting.
- Since the government has declared that it wants to pursue an aggressive carbon target (rightly so) then it seems somewhat bizarre to follow a development target which would result in much more commuting. This is against the background of a railway line in the South of Wealden which is at capacity at peak times, therefore driving commuters towards use of cars.

So it is puzzling to understand why the government would want to drive accelerated and substantial housing growth in this area of the country. It is our opinion that the housing development target for Wealden needs to be reduced, downwards, and quickly!

It should be pointed out that following the recent change in government formula, the required number of houses to be built in Wealden has gone from 1199 per annum to 1225, whilst the neighbouring district of Rother has seen their figure go from 1169 per annum to 736. This defies logic.

However the numbers of unbuilt houses in Wealden does demonstrate one clear fact – Planning permission is NOT the barrier to houses being built. Making Planning permission easier for developers would remove control of local authorities, damage the local democratic process and would still NOT result in more houses being built.

To elaborate more;

First of all, the government believes that a larger supply of housing would reduce house prices. This is true. But how does more Planning permission being granted lead to more houses being built?

- According to the Local Government Association in March 2020, there are over 1 million houses in England which have had Planning permission to be built since 2010, but are not yet built!
- Land prices and house prices in Wealden are high because supply and land prices are completely in the hands of the developers:
  - Speculative development companies approach landowners, and offer to mediate to put their land forward for development in return for a percentage of the land sale price.
  - These companies then progress outline Planning permission, and sell the land “auction-style” to builders – driving the price up.
  - They also frequently break these developments into smaller plots, and this complicates the S106 situation for making provision for much-needed infrastructure, since none of the developments are substantial enough to provide required funding for schools, open green space, roads etc.
- When the builders then obtain Planning permission, they may or may not choose to develop. We are witnessing locally that builders are carrying out minor works – drains, footings etc. – which fulfils their undertaking to start work within three years, yet no houses are built. At some point, they will erect show homes, and try to attract buyers. When they have lined up perhaps 10 buyers, they build 10 houses – at the price determined by the builder.
- Therefore there is NO increase in supply driving a reduction in price.
- Significant plots of land are currently “banked” in Wealden in this way.

Furthermore, developers are manipulating the 5 year land supply. In Uckfield, a development of 1,000 houses is being built-out “officially” at 125 houses per annum (in reality it is not even achieving this). So the developers can use the NPPF rules on 5 year supply to drive more Planning permissions and “bank” more land. But still, no more houses actually get built.

So it can clearly be seen that developers are deliberately manipulating the housing supply to keep prices high and maximise profit – indeed their “banked” land, bought several years ago when house prices were lower, continue to contribute to increasing levels of profit.

What is needed, we would suggest, is:

- 1) a start and end date in planning permission – for example, “development must commence within 24 months and be completed within 48 months”.
  - This would serve to increase housing supply and reduce house prices assuming that rules were put in place to stop developers splitting developments into small plots, therefore bringing them forward in a “trickle”.
- 2) In their March 2020 representation to the government, the Local Government Association suggested measures such as charging council tax on unbuilt houses, or having the right to purchase unused building land from the developer, either in total or in part.

Such measures should be seriously considered.

With regard to the actions of speculative developers, there are several courses of action that could be taken:

- Though a Conservative government is generally supportive of market forces, one method might be for local authorities to be allowed to set the price per acre of building land – therefore reducing the price of land and ostensibly the price of the resulting developed properties, and stopping “auction” of valuable building land
- One has also to consider the policy proposed by the Labour Party of launching a “National Building programme” where the government would effectively set up a programme and run it centrally.

Whilst that would not normally be a Conservative strategy, it cannot be denied that it might achieve the required objective AND potentially give a boost to employment and the economy at a time when this is sorely needed, whilst making housing more affordable.

Indeed another issue is that of affordable housing. Currently, a developer is allowed to “opt out” of building “Affordable” housing if their margin can be shown to be reduced below 15-20%. Forcing property prices down will immediately create this issue, especially where developers have been sitting on land for several years and have actually “written-up” the land price.

- What the government would need to decide is whether there is an alternative route to affordable housing, or whether a short-term lack of affordable housing could be tolerated with a medium term reduction in the market price of property.

In conclusion therefore, this letter has three main requests of the government:-

- 1) Set housing targets via a revised NPPF formula which are reasonable for the expected housing need (also taking into account “pent-up” demand)
- 2) Leave current Planning legislation alone in terms of permission to develop, but focus changes on forcing developers to build property in a shorter period of time, including refusal of extensions and renewals to Planning permission.
- 3) Consider radical proposals to boost housebuilding. Currently the building rate and price of housing is entirely in the hands of developers. It needs to be dictated by Central and Local government in order for any policy of boosting housing numbers, and therefore reducing housing prices, to be successful.

We would very much welcome your response to our observations and proposals. Furthermore we would strongly ask you to look into the situation as it exists in Wealden, where the emerging

local plan is already looking to make a policy of building on AONB, and where 2 developments were referred to the Housing Minister in 2020 to be called in.

Thanking you in anticipation for your time and consideration

Wealden Alliance for Sustainable Planning (WASP).