

Your reference

Our reference 1939363/KZH2

**Wragge & Co**

23 February 2007

Panel Secretariat  
Bridge House  
1 Walnut Tree Close  
Guildford  
GU1 4A

Reply to:  
3 Waterhouse Square  
142 Holborn  
London EC1N 2SW  
DX 282 LDE

Dear Sirs

55 Colmore Row  
Birmingham B3 2AS  
DX 13036 Birmingham 1

## EIP Session on South East Plan Non-Participants Statement

Rond Point Schuman 9, bte 4  
B-1040 Brussels  
Belgium

Please find enclosed Jennifer Owen's statement for the additional panel session which I understand is due to be held in March 2007.

I would be grateful if you could acknowledge receipt.

T +44 (0) 870 903 1000  
F +44 (0) 20 7664 0340  
mail@wragge.com  
www.wragge.com

Yours faithfully



**Karen Howard**  
**Director of Planning - London**

Wragge & Co LLP  
is registered in  
England and Wales as a  
Limited Liability Partnership  
Registered no. OC304378

DDI Number: +44 (0)20 7864 9538  
E-mail: karen\_howard@wragge.com

Registered office:  
55 Colmore Row  
Birmingham B3 2AS

Wragge & Co LLP  
is regulated by  
the Law Society  
of England and Wales

A list of members of  
Wragge & Co LLP  
is open to inspection at  
the registered office



BS EN ISO 9001:2008  
BS EN ISO 26004:2006

in association with

 **Graf von Westphalen**

**Jennifer Owen  
on behalf of Pelham Homes Limited. (7712)**

**2A Spatial Strategy Revisited/  
Revised 2A.5**

**Does Policy H1 plan for an appropriate and deliverable level of housing growth for each sub region and “Rest of County” area, taking account of best available information and all relevant factors including**

- **The draft plan’s vision and public opinion**

The vision for the Plan is contained within Section C of the Draft South East Plan. The central theme is that of a healthy Region with a sustained improvement in its quality of life. This improvement will be measured against the well-being of its citizens, the vitality of its economy, wealth of the environment and prudent use of natural resources.

Pelham Homes supports this vision and believes it can only be realised through an increase in number of houses to be built over the plan period for the reasons set out below. Pelham therefore support an increase in the overall level of housing to be built.

Pelham believes that the scenario set out in the Non Participants Statement for the original session 2A by Sellwood Planning and which is generally in accord with the Roger Tym Report, Augmenting the Evidence Base, is supported in respect of increasing the overall annual dwelling target to 35,000 dwellings.

With regard to the distribution of this additional housing Pelham believes that in the interest of economic efficiency through the bringing forward of underused resources in the economy as represented by the most disadvantaged areas of the Region the focus for extra dwellings should be the Sussex Coast and East Kent Sub Regions. It is only by bringing forward economic regeneration

and development in these areas that a consistent and sustained improvement in the quality of life of the Region can be achieved.

The Panel has heard a mixed response from the public with regard to the Sub Regions of East Kent and the Sussex Coast. Wealden, Eastbourne and East Sussex Councils support the growth set out in the Draft Plan for the area between Eastbourne and Hailsham but have indicated that they would not wish to see any further growth. Unfortunately this would appear to be the case in all Districts apart from those where Growth Point status under the Governments National initiative is sought.

In East Kent, Dover seeks to increase its housing target and it appears that Shepway are now also seeking to embrace higher targets although at the EIP into the recently adopted Kent Structure Plan Thanet sought growth and Shepway did not want an increase. These changing views must be put aside by the Panel as they reflect the volatile political situation in the Sub Region. Instead the Plan must take its vision and apply it consistently looking to the long term.

- **Demographic, housing need and backlog, and affordability**

The Panel has heard evidence that the housing provisions in the Draft Plan for the Districts which make up the Sussex Coast Sub Region will not meet their demographic requirements. This situation cannot be allowed to continue and it is essential that the housing total for the Sub Region must be increased for this reason alone.

With regard to East Kent the Panel has heard that the Draft Plan meets the demographic requirement as a whole and also meets the requirement for expected employment growth. What the Panel has heard is that in East Kent the housing proposals will not meet the affordable housing requirement in any district except Ashford. The Panel has also heard that Ashford does not intend to increase its affordable housing requirement in order to meet this shortfall. For these reasons the overall housing target in all Districts within the East Kent Sub Region outside Ashford should be increased so that levels of affordable housing to meet the needs of the Sub Region can be met.

- **Economic potential and regeneration**

The Panel has heard evidence from SEEDA that the housing levels in the Sussex Coast should be increased in order to meet economic objectives. The Panel has also heard evidence from East Sussex that the area between Eastbourne and Hailsham is one where capacity exists for housing growth. The housing requirement for Wealden District should be increased from 400 dpa to 600 dpa. The extra housing should be located in the south of the district with appropriate infrastructure delivery and economic development in order to realise the economic potential and aid the regeneration of this area. Pelham Homes have identified that with several sites operating in the two towns of Hailsham and Polegate, which are the urban areas in this part of Wealden, the market is capable of absorbing the 400 dpa likely to come onto the market taking into account affordable housing provision within the 600 target.

With regard to East Kent the Panel has heard from Dover District of the urgent need to provide extra housing in order to regenerate the town. SEEDA have supported such aspirations and the inclusion of urban extensions at all the East Kent urban areas in order to aid regeneration. Pelham consider that together with the need to increase housing levels at Thanet, Dover and Shepway for regeneration purposes the Housing level at Canterbury should be increased to take into account the reduction in the Draft Plan provision against RPG9 requirement and also to acknowledge the important role which the City of Canterbury will play in leading the regeneration of the sub Region.

The Panel has already heard of the effect which this is already having through the university developments at Thanet and Dover. The extra housing at Canterbury will also balance the adopted Local Plan Business Park allocation and help to rectify the commuter problem identified in the Highways Agency Sub Regional narratives by allowing more people to live in closer proximity to where they work and the higher tier services offered at the City. In this way the housing targets at Thanet should be increased from 325 dpa to 400 dpa and at Canterbury the level of provision should be increased from 360 to 500 dpa in order increase the provision to RPG9 levels and beyond to take into account the factors outlined above. Pelham

accept that further increases are required at Dover and Shepway but have no knowledge of the particular circumstances.

The Panel has been asked by Thanet DC to annotate Policy H1 Table with a footnote to the effect that the 900 units at Westwood is a reserve allocation. The Allocation at Westwood is contained within an Adopted Local Plan with no restraint on it coming forward. Pelham do not consider it to be a reserve site. Therefore further allocations are needed at Thanet.

- **Local capacity for growth, including infrastructure and government policy initiatives**

In East Kent the Highways Agency has identified surplus capacity on the Trunk Road network. Ashford has taken the lead through the work of the Council and Ashford Landowners Group working with Roger Tym and Partners in demonstrating how infrastructure delivery can be properly planned in order to accommodate growth and there is no reason to suppose that similar initiatives would not also be capable of delivering growth in the other Districts of East Kent.

Pelham Homes have experience of forward funding strategic infrastructure in Ashford, particularly the Junction 10 Interim scheme, as part of the South Ashford Recommended Transport Plan covered by Ashford Borough Council's Supplementary Planning Guidance No. 6. It is Pelham Homes view that ,subject to the preparation of the necessary infrastructure plans for the Polegate area, development including their own allocation west of Polegate, is well placed to deliver the required infrastructure via normal S106 Agreement contributions or via the increasingly popular tariff arrangements.

The Panel has heard evidence that the land values in Thanet are so low as to be incapable of delivering infrastructure necessary for the regeneration of the District. Pelham's assessment of market value does not support this assessment.

Pelham consider that infrastructure and regeneration can be delivered through residential development and are willing in principle to assist in providing necessary infrastructure through their schemes.

The A27 Wilmington Improvement (west of Polegate) is a particular case in point. In October 2006 SEERA confirmed the requirement for an A27 Wilmington Improvement in the period 2011 to 2016. An indicative route for this improvement is protected in the adopted Wealden Local Plan and Transport Policies are in place in the Non-Statutory Local Plan to deliver this improvement by development funding. Pelham Homes have already supported the delivery of strategic infrastructure by funding from development and they have demonstrated this can be achieved by being instrumental in delivering the M20 Junction 10 Improvement in Ashford which is currently under construction.

Southern Water Services have worked with the Planning Authority to develop a strategy for providing new and enhanced waste water treatment to the Ashford Growth Area. The Ashford Landowners Group with Roger Tym and Partners has assessed the ability of developer funding, or tariff arrangements, to deliver the necessary infrastructure works. Pelham Homes consider that similar focussed studies in the Hailsham/Polegate area will demonstrate how infrastructure delivery can be properly planned in order to accommodate growth.

## **Environment**

Environmental constraints have been identified for development of the Sussex Coast sub region. However Pelham have identified areas for development which can come forward without significant environmental impact.

In East Kent the Roger Tym report has identified urban extensions at the principle urban areas which are environmentally unrestrained and within walking distance of town centres which are in need of regeneration. This is particularly true of Thanet.

### **2.A.6**

**Hypothetically, what would be the implications of higher regional housing levels on:**

**Water supply and waste water treatment, and flood risk  
Transport and other infrastructure**

**Affordable housing  
Landscape, heritage and biodiversity assets  
And to what extent could these be addressed?**

**Water supply and waste water treatment and flood risk**

Pelham Homes consider that the comparable study work in the Sussex Coast sub-region and other Districts of East Kent, to the Ashford Landowners Group work with Roger Tym and Partners, will demonstrate how infrastructure delivery can be properly planned in order to accommodate growth.

**Transport and other infrastructure**

The delivery of necessary strategic highway improvements to accommodate development has been demonstrated by Pelham Homes in Ashford, and Pelham see no reason why these principles should not be applied more widely in the region.

**Affordable Housing**

For the reasons set out above, Pelham Homes consider the overall housing target in all Districts within the East Kent Sub Region outside Ashford should be increased so that levels of affordable housing to meet the needs of the Sub Region are met.

**Landscape, heritage and biodiversity assets**

As noted above, Pelham Homes have identified areas for development which can come forward without significant impact on the environmental constraints in the Sussex Coast sub region. Also in East Kent, Roger Tym has identified urban extensions at the principle urban areas which are environmentally unrestrained and within walking distance of town centres which are in need of regeneration, such as Thanet.