Public Hearing Statement
on behalf of Taylor Wimpey

Thursday 3 May 2012

Matter 2 – Housing, Economy and Infrastructure
(Core Strategy Policies: SS2, SS5, CSD1, CSD2, CSD3, CSD5, CSD10)

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Shepway Core Strategy Development Plan
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on behalf of Taylor Wimpey

(Respondent References 900 and 921)

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Matter 2 – Housing, Economy and Infrastructure
(Core Strategy Policies: SS2, SS5, CSD1, CSD2, CSD3, CSD5, CSD10)

The Observatory
Southfleet Road
Ebbsfleet
Dartford
Kent DA10 0DF

Tel: 01322 374665
Fax: 01322 374661
Email: david.bradley@bartonwillmore.co.uk

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Issue 2: Are the Core Strategy’s proposals for the provision of new housing and economic development deliverable, clear, sufficiently justified and consistent with the local evidence base, the South East Plan and national policy in PPS3? Does the Core Strategy provide satisfactorily for the delivery of development, with particular reference to transportation infrastructure, and enable adequate monitoring of its effectiveness?

2.1 Is policy SS2’s housing target, which is in excess of that needed to meet South East Plan requirements, adequately justified by the local evidence base? Specifically:

a) Is this target achievable, given recent housing completion rates?

b) Has a sufficient level of housing supply been identified to meet this target, consistent with PPS 3’s requirements of deliverability and developability?

Inspector’s Note: it would be helpful if the housing supply information in table 4.2 could be further broken down, along the following lines:

- Completions
- outstanding planning permissions
- existing development plan allocations that have not yet been built and remain available (excluding those with outstanding permissions)
- housing supply arising from Core Strategy allocations
- housing supply anticipated to come from sites to be allocated in future DPDs (excluding those with outstanding permissions)
- housing supply anticipated to come from sites that have not been specifically identified as available through the local planning process (“windfall sites”) – if any.

c) What is the justification for setting a housing target to 2030/31 in addition to 2026/27?

2.1.1 This statement is made on behalf of Taylor Wimpey who have land interests in Sellindge. Taylor Wimpey’s principal involvement in the EiP Hearing Sessions relates to matter 5 and Policy SS: Sellindge Strategy.
2.1.2 This statement addresses only 2.1 of the questions in the paper entitled “Inspector’s Matters, Issues & Questions” dated 14 March 2012. It is noted that a further opportunity is available to make representations on the matters raised in the National Planning Policy Framework (NPPF), as far as they relate to the Shepway Core Strategy. Whilst this submission refers to the recently published NPPF, the right is reserved to make additional comments by the deadline of 27 April 2012.

2.1.3 It is worth briefly reiterating the context in which Shepway District Council have set their housing requirement, which is set out in the Core Strategy. The District is faced with a significant ageing of its population, which along with having its own direct implications, is closely related to economic performance, particularly due to the associated restriction in labour supply. This is a key consideration given the economic, and associated socio-economic challenges, that the District is facing.

2.1.4 Housing growth options have been considered and a rate of housing growth proposed that seeks to transform Shepway’s economy. Paragraph 4.41 of the Core Strategy states that a positive approach is set to increase opportunities to meet selected housing and employment needs, and to reduce the projected decline in the working population and younger age groups. This approach is similar to that adopted by Dover District Council in the adjoining Dover District, which was found sound by the Dover Core Strategy Inspector.

2.1.5 The approach in principle, which also takes account of environmental constraints in the District, is considered to positively respond to advice in the National Planning Policy Framework (NPPF). Specifically, the following elements of the NPPF support the approach being taken by Shepway District Council in principle:

- Local Planning Authorities should boost significantly the supply of housing (paragraph 47);
- Local Plans should be aspirational but realistic. They should address the spatial implications of economic, social and environmental change (paragraph 154);
- The plan should be positively prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements (paragraph 182 – new ‘positively prepared’ soundness test).
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2.1.6 Other options for higher housing growth were tested through the Sustainability Appraisal process, but were discounted because of environmental constraints within the District including the AONB. This demonstrates that a considered approach has been taken by Shepway District Council so as to balance economic, social and environmental issues in setting the housing target.

2.1.7 The South East Plan sets out a housing requirement of an annual average of 290dpa between 2006-2026. However, paragraph 7.6 of the South East Plan states that the South East Plan’s annual housing requirement (32,700) is significantly below the forecast growth of households and even more so by the 2006 based population projections. Paragraph 7.6 goes on to state that the current short term market conditions are not expected to help alleviate the worsening housing affordability in the longer term. Following the context set out in paragraph 7.6, paragraph 7.7 of the South East Plan clearly states that local authorities can test higher numbers through their development plan documents provided that they are consistent with the principles of sustainable development set out in PPS1 and tested through Sustainability Appraisal and Habitats Regulations Assessment. Therefore, the approach being taken by Shepway District Council is considered to be consistent with the South East Plan.

2.1.8 It is also worth noting that Shepway District lies entirely within the East Kent and Ashford Sub-region of the South East Plan. Policy SP1: Sub-Regions in the South East makes it clear that the nine identified Sub-regions will be the focus for growth and regeneration. Again, the approach being taken by Shepway District Council is considered to be consistent with the South East Plan.

2.1.9 It is considered that the housing target set out in SS2: Housing and the Economy Growth Strategy is achievable given recent housing completion rates. 1,414 completions have taken place in Shepway over the 5 year period 2006/07 to 2010/11. This equates to 283dpa. Completions in 2009/10 and 2010/11 were 180 and 132 dwellings respectively. However, this reflects the national economic climate and the Core Strategy covers the period to the end of March 2031, i.e. over a period of time that is likely to experience considerable economic growth in contrast to the current situation. Indeed paragraph 4.33 of the Core Strategy states that delivery in Shepway, has been in the order of 300 to 500 dwellings a year for most years between 1990 and 2006. An aspirational strategy that seeks to positively change underlying demographic and economic factors, with a higher housing requirement
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than the South East Plan, is likely to assist in increasing housing delivery, which is a central part of the Government’s agenda.

2.1.10 It is considered that a sufficient level of housing supply been identified to meet the Core Strategy target given outstanding planning permissions, unimplemented Local Plan sites, the Core Strategy allocations, other broad areas identified in the Core Strategy to be brought forward through the Allocations DPD and windfall sites. The NPPF also establishes the presumption in favour of sustainable development which should assist in encouraging housing delivery through appropriate planning applications. Table 4.2: How much housing minimum requirement will be delivered through the plan period sets out, using three categories, how the Core Strategy target will be achieved. However, it is considered that the Inspector’s request for table 4.2 to be further broken down will be a useful exercise and provide further comfort that a sufficient level of housing has been identified to meet the Core Strategy target.

2.1.11 The justification for setting a housing target to 2030/31 in addition to 2026/27 is best answered by Shepway District Council. However, in seeking to address significant demographic and economic issues it is considered helpful to ensure a longer term framework is in place. This is supported by the NPPF which states, at paragraph 157, that Local Plans should be drawn up over an appropriate timescale, preferably a 15 year time horizon, but take account of longer term requirements.

David Bradley BA (Hons), Dip TP MRTPi
Planning Consultant
Barton Willmore LLP