Matter 2
– Housing, Economy and Infrastructure

Additional Statement
by Blue Sky Planning
on behalf of
Phides Limited

April 2012
Matter 2 – Housing, Economy and Infrastructure

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 ..........

Issue 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 PPS3’s requirements of deliverability and developability?

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

South East Plan Requirement

1. The South East Plan at present remains part of the development plan framework, although it is the government’s intention to revoke it.

2. The South East Plan proposed a housing figure for Shepway of 5,800 new dwellings between 2006 – 2026, but also stated that local planning authorities can put forward their own higher (but by implication, not lower) figures through their own development plans (SE Plan, para 7.7).

3. The Core Strategy refers to the SE Plan figure as ‘a minimum housing target’ and goes on to state ‘local evidence in the SHMA and SHLAA suggested that future housing needs and potentially land availability were greater than identified in the South East Plan’ (Core Strategy, July 2011, para 4.33).

4. In our opinion, it is not inconsistent with the South East Plan if a local planning authority proposes a higher housing target through its own development plan, although this would need to be justified through the local evidence base.

National Policy

5. The Government’s planning policies for England are now set out in the National Planning Policy Framework (NPPF) which was published in March 2012. With particular regard to
housing, in order to ‘boost significantly the supply of housing’ (NPPF, para 47), local planning authorities are required to:

- ‘ensure that their Local Plan meets the full, objectively assessed needs’ for housing in their area;
- ‘identify key sites which are critical to the delivery of the housing strategy over the plan period’;
- ‘identify and update annually a supply of specific deliverable sites sufficient to provide five years worth of housing against their housing requirements’;
- add to the five year supply ‘an additional buffer of 5% (moved forward from later in the plan period) to ensure choice and competition in the market for land’;
- ‘where there has been a record of persistent under delivery of housing, local planning authorities should increase the buffer to 20%’;
- ‘local planning authorities may make an allowance for windfall sites in the five year supply if they have compelling evidence that such sites have consistently become available in the local area and will continue to provide a reliable source of supply’.

(Para 47, NPPF March 2012 – our emphasis)

6. For the reasons we refer to below, and in paras 49-64 of our main representations, Policy SS2 would be insufficient to meet in full the needs objectively identified in Shepway’s own evidence base. Therefore, as currently drafted, Policy SS2 would be contrary to national planning policy.

7. In our opinion there has been a record of persistent under delivery of housing over the past six years (2006-2012) and therefore an additional buffer of 20% should be added to the five year land supply requirement.

Is Policy SS2’s housing target justified by the local evidence base?

8. Shepway’s own evidence base shows that the Policy SS2 housing target is too low for the growth strategy which lies at the heart of the Core Strategy.

9. Policy SS2 proposes a housing target of 8,000 new dwellings over the plan period of 2006 to 2026 i.e. 400 new dwellings per annum.

10. According to Shepway DC’s own evidence base, 8,000 new dwellings would be insufficient to meet the identified needs of the District (the DC estimates that 8,000 new dwellings would fail to accommodate the existing workforce, let alone provide housing to cater for the identified future identified demand for labour assuming a growth strategy).

11. Therefore it is clear that a target of 8,000 new dwellings would be an impediment to economic growth.
12. In our opinion, based on Shepway's own evidence base, the appropriate housing target to meet identified housing need in Shepway would be 10,700 new dwelling (the evidence for our views on the evidence base and housing need is contained in paras 49 – 64 of our main representations).

*Is the Policy SS2 target achievable, given recent housing completions?*

13. Probably not, unless Shepway DC identifies more land which is developable and deliverable.

14. The Annual Monitoring Report (AMR) 2011 states that 1,414 net additional dwellings were completed between 2006 - 2011, and a further 163 net additional dwellings are estimated to be completed during 2011/12, giving a total delivery of 1,577 new dwellings between 2006 - 2012, an average of 263 dwellings per annum in the first 6 years of the plan period. This represents an annual shortfall of 34% compared to the Policy SS2 target of 400 houses per annum; or a total shortfall of approx 823 dwellings during the first six year period of the plan compared to the target of 2,400 new dwellings (a shortfall of 34%).

15. The shortfall is even greater if the housing target we propose, based on identified need, of 10,700 dwellings is adopted. In this case the annual target would be 535 dwellings per annum (or 3,210 dwellings between 2006 and 2012). On this basis the average completions of 263 dwellings per annum would represent a total shortfall of approx 1,633 dwellings during the first six year period of the plan i.e. a shortfall of approx 51% (i.e. 1,577 new dwellings delivered between 2006 – 2012, against a target of 3,210 new dwellings).

16. Our detailed assessment on this topic (based on the information included within the 2010 AMR, which was the document available at the time of submission of our assessment) is contained in paras 65 – 80 of our main representations.

*Has a sufficient level of housing supply been identified to meet this target, consistent with PPS3’s requirements of deliverability and developability?*

17. In our main evidence (paras 82 – 86) we raised concerns regarding deliverability. The NPPF states that to be considered deliverable:

> 'sites should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years and in particular that the site is viable.'

(NPPF, footnote to para 47)
• Folkestone Sea Front Site (Ref 40)

18. In our main representations (para 83) we raised concerns about the deliverability of the Folkestone Seafront site, particularly as it was first identified as a strategic housing site over 10 years ago will 500 units to be delivered by 2011. At the time of writing it has not delivered a single unit and a planning application has not been submitted.

19. We note from the updated SHLAA July 2011 (page 100) that the Folkestone Seafront site (Ref. 40) is due to start delivering residential units in 2 years from now and forecast to deliver 60 units within the next 5 years up to 2017. This would appear wholly unrealistic.

• Nickolls Quarry (Ref 177)

20. In our main representations (paras 84 – 85) we raised concerns regarding the deliverability of Nickolls Quarry and these concerns remain, particularly as the updated SHLAA July 2011 (page 101) assumes that the site will now deliver only 21 units within the next five years, i.e. before 2017 (we note this represents significant slippage from the AMR 2010 which forecast a delivery of 225 new dwellings by 2016).

21. In our main representations we also referred to the 2.25 million tonnes of landfill required to raise the level of the site (as it is located within Flood Zone 3). We understand that over the past year or so the rate of fill has reduced significantly to around 100,000 tonnes per annum (at this rate of fill it would take approx 22 years to complete the enabling fill operation which extends to a requirement of 2.25 million tonne).

• Shorncliffe Garrison (Ref 354 and 367)

22. In our main representations (para 86) we raised concerns regarding the deliverability of Shorncliffe Garrison and these concerns remain.

23. We note from the updated SHLAA July 2011 (page 102) that the Shorncliffe Garrison (Ref. 354 and 367) is due to start delivering residential units next year (2013/14) and forecast to deliver 260 units within the next 5 years up to 2017. This would appear wholly unrealistic.

24. We would also request the Inspector to request evicence that the site has indeed been officially declared surplus to requirements. We have not seen any evidence to date that the site has been declared surplus to requirements. If the site is not ‘available now’, as required by the NPPF, then it should not be regarded as a deliverable site. If the site has been officially declared surplus to requirements, and is available for development now, then this should be a very straightforward matter for SDC to respond to.
What is the justification for setting a housing target to 2030/31 in addition to 2026/27?

25. In our opinion there is no justification for this.

26. The Council's own evidence base covers the period from 2006 to 2026.

27. The Council's own identified need for housing covers the period 2006 to 2026 (see para 52 of our main representations).

28. Policy SS2 states that the housing target is 8,000 new dwellings by 2025/26.

29. The references to minimum targets and extended periods for achieving targets, is confusing. We assume that setting an extended time frame is an indication that the District Council is not confident of achieving its targets by 2026.

30. In our opinion, as the evidence base relates to an identified need during the period 2006 to 2026, the Core Strategy should aim to meet that need by 2026.