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Representor 1016243

Matter 9

MIQ 9.3 queries whether the modified plan includes sufficient sites to enable the Council to demonstrate that there is a 5 year supply of housing that is available and deliverable. In this regard the Council published, in November 2016, SBC/PS/113: Statement of Housing Land Supply 2015/16.

In the executive summary the Council incorporate a schedule which would suggest that there is a 5.4 year housing land supply. This conclusion is reached on the basis of a stated five year requirement for 838 dwellings per annum. However, the figures in the executive summary do not tally with the figures included within the main body of the report, which suggest (paragraph 20) that the annualised housing requirement is 904 dwellings per annum.

This discrepancy alone casts considerable doubt on the legitimacy and robustness of the housing land supply assessment.

Notwithstanding this issue, the National Planning Policy Framework (NPPF) requires (paragraph 47) that, in identifying housing targets, Council's should add a 5% buffer to ensure choice and competition in the market. A 20% buffer is to be added where there has been a record of persistent under delivery of housing.

In the Statement of Housing Land Supply (Executive Summary, paragraph IV, and paragraphs 29-32 of the main report) the Council admit that there has been a persistent under delivery of housing. It is, though, claimed that as this was beyond the control of the Council the 5% buffer on housing target should be applied rather than the 20%.

This is not what the NPPF advocates. In simple terms the NPPF requires (irrespective of where 'fault' lies) that persistent under delivery be addressed by adding a 20% buffer to housing targets. In drawing conclusions as to Swale's five year housing requirements, therefore, a 20% buffer should be added to the housing target.

Moreover, in seeking to establish a five year housing land supply the Council have adopted the Liverpool rather than the Sedgefield methodology to address historic under supply. The former method addresses historic shortfalls in delivery over the life of the Local Plan (15+ years). The latter addresses historic shortfalls in the first five years of the plan period.

It is the Sedgefield approach that Planning Practice Guidance (PPG) states should be adopted. Para 0035 of the PPG states:

Local planning authorities should aim to deal with any undersupply within the first 5 years of the plan period where possible.

If a 20% buffer is adopted (to correctly reflect persistent under delivery), together with the Government endorsed Sedgefield methodology, the Council can only demonstrate a 3.45 year housing land supply. An appeal decision dated 9th January 2017 (appended hereto) similarly concludes that there is not a five year housing land supply.

Our conclusion on the 3.45 year figure is based on taking, at face value, the delivery of everything that is said to make up the supply of housing.

In this regard, it should additionally be noted that the stated housing land supply is based upon all of the allocations in the emerging Local Plan being endorsed by the Local Plan Inspector. Given that the Local Plan Inquiry sessions have not even reconvened yet, and given that some of the proposed allocations are particularly controversial, it is difficult to see how the Council can be so reliant on delivery of those sites at this stage.

Finally, it should also be noted that in Appendix C to the Statement of Housing Land Supply the Council have scheduled out every housing allocation in the emerging Local Plan, together with a breakdown of how many houses each site will deliver on a year by year basis.

There are multiple sites that – taken at face value – will deliver nothing at all in years 1-3 but which are claimed to be capable of delivering a significant quantum of development in years 4 and 5.

The following represent the prime examples:

- **SW/040/73 Land north of Quinton Road:** No development at all anticipated in years 1-4. 100 dwellings expected in year 5 alone. The commentary acknowledges that delivery is dependent upon improvements to the A249, which will require LTP funding.
- **SW/703 SW Sittingbourne:** No development at all anticipated in years 1-4. 60 dwellings expected in year 5 alone. The commentary states that ‘given the complexities completions in year five are considered to be a more cautious approach’. Delivery of 60 dwellings in a single year does not represent a cautious estimate.
- **SW/330 Stones Farm:** No development anticipated in years 1-3. 130 dwellings expected in years 4 and 5.
- **SW/335 West of Rushenden Road:** No development anticipated in years 1-3. 125 dwellings expected in years 4 and 5.
- **SW/413 Perry Court Farm:** No development anticipated in years 1 and 2. 85 dwellings expected in year 3; 50 in year 4; and 75 in year 5. The commentary refers to completions from 2018/19 being ‘challenging’, and yet the trajectory relies on completion of some 85 dwellings in that single year.

A single developer, on a single site, is likely to deliver a maximum of between 40 and 50 dwellings per annum. The assumptions adopted in the Statement of Housing Land Supply are unrealistic, and falsely inflate the housing supply position. If a more conservative, and accurate, set of assumptions were adopted the result would clearly be that the Council cannot even demonstrate a 3.45 year housing land supply.

That being the case the emerging Local Plan should be promoting the allocation of land for a greater number of dwellings, especially where sites are sustainably located, and clearly capable of being delivered within the short term.

The persistent under delivery of all housing – coupled with viability issues – has meant that under delivery of affordable tenures has been exacerbated, and is therefore more pronounced than the under delivery of market housing. This further fuels the need to allocate additional land for residential development, especially where it can be delivered early in the plan period and can incorporate a significant proportion of affordable housing.

On a related note, Main Modification 42 of the emerging Local Plan (Policy ST2) suggests that:

To ensure the alignment and achievement of its jobs and housing targets, the Council will monitor the take up of land and commit to commencing a review of the Local Plan within three years of its adoption, or sooner if or when:

1. *Economic indicators suggest there is likely to be a significant change in the delivery of jobs or employment floorspace; or*
2. *Shortfalls in the five year supply of housing land seriously compromise the ability of the Local Plan to achieve its housing target.*

The foregoing criticisms of the Statement of Housing Land Supply would suggest that a shortfall in the five year supply of housing will compromise the ability of the Local Plan to achieve its housing target. This cannot constitute good, long term, strategic planning. Surely it is far more appropriate to advance a Local Plan which is not bound to require review after a period of only three years, on the basis that insufficient housing land is being advanced?

To act upon this recommendation would accord entirely with the direction provided by the National Planning Policy Framework that Local Planning Authorities should significantly boost the supply of

housing. This conclusion correlates with our conclusions drawn in relation to Matter 2, and which relates to delivery of the area's development needs over the plan period.