

Issue 2: Overall Strategy - Housing Numbers

2.1: How does the housing provision for the Plan period relate to that of the Regional Spatial Strategy (RSS), the South East Plan?

CPRE Protect Kent considers that the residual housing target of 1,000 dwellings to be met by the DPD over the period 2006 to 2021 accords with that set in Policy CS6 of the adopted Core Strategy. Whilst the adoption of the Core Strategy pre-dates the adoption of the South East Plan, we are content that this target is appropriate as explained in the Core Strategy (paragraph 6.2) and the submitted DPD (paragraphs 5.1 to 5.5), and thus conforms generally to the South East Plan.

2.2: How has the SHLAA (November 2009) informed the DPD?

Whilst we note that a SHLAA has now been prepared and presented, we are concerned that it has been compiled as a retrospective exercise, rather than provided up-front as part of the evidence base informing decisions made during the formulation of the DPD.

The SHLAA posted on the Council's web-site is dated December 2009, and we are not aware of any earlier drafts being presented. The proposed submission DPD was published under Regulation 27 in June 2009 – some six months before the SHLAA was made publicly available. We raised concerns about the absence of a SHLAA at all the stages in the plan making process, including at Regulation 27 stage (see our representations TPV43 and TPV44). Consequently, we have no confidence that the SHLAA has actually informed the DPD as PPS3 requires it to.

We fully acknowledge that workshop sessions were held with local communities during the preparation of the DPD, though it is our understanding that these focused on potential new sites.

In particular, as we state in our representations, it seems that sites with planning permission, although acknowledged in the SHLAA as a source of housing supply, will not count towards meeting the reduced residual housing target set for the DPD in paragraph 5.6. We comment further on this in response to question 2.3 below.

2.3: Have housing completions and commitments since 2006 been fully taken into account?

Completions

With regard to completions, we are now satisfied that the SHLAA correctly identifies these for 2006/07 and 2007/08. We agree with the sites identified in Appendix 1 of the SHLAA and the “*Summary of housing potential 2006 – 2021*” presented in Table 6 of the SHLAA. These both show that for the rural area covered by this DPD there was a total of 151 completions over the period 2006-2008. However, this does not quite tally with the 139 completions reported in paragraph 5.6 of the submitted DPD, which needs to be corrected accordingly. This would also require the reduced residual housing target to be amended to 849 (from 861).

In addition, completions for 2008/09 are now available. From the site monitoring information we have been provided by Kent County Council there have been a further 113 completions in the area covered by this DPD (see Annex 1 to this statement).

Extant Planning Permissions

We remain very concerned that no allowance has been made for extant planning permissions contributing towards the reduced residual housing target. The SHLAA recognises that existing planning permissions “*provide a separate source of provision as they are the most deliverable in relative terms*” (page 15).

Section 5 of the SHLAA gives a very positive assessment of the deliverability of sites with planning permission, concluding that:

- all sites under construction will be delivered during the next five years (i.e. from 2008);

- 95% of all sites under 0.2ha and not started will be delivered during the next five years; and
- 95% of all sites between 0.2ha and 25+ dwellings and not started will be delivered during the next five years.

Sites with planning permission for 25+ dwellings have been individually assessed in Appendix 3 of the SHLAA.

Appendix 2 of the SHLAA lists all the sites with planning permission as at 31st March 2008. For the area covered by this DPD it shows that a total of 376 dwellings had planning permission at that date. Of the sites with planning permission, three comprised large sites of 25+ dwellings as follows:

- Former Oil Depot, Bramble Lane, Wye: remaining 29 dwellings not started;
- Former H M Prison, New Road Hill, Aldington: 20 under construction and 47 not started;
- Land at rear of, Woodlands View, Wittersham: 27 not started.

The SHLAA in its assessment of the large sites (Appendix 3) concludes that all three of these sites, comprising a total of 123 dwellings, will be completed by 2014.

The SHLAA (Appendix 2) shows that, excluding the Aldington site above, a further 74 dwellings were under construction, which will be completed by 2014.

The SHLAA (Appendix 2) shows that, excluding all three of the large sites above, a further 179 dwellings had yet to be started. The SHLAA concludes that 95% of these will be delivered by 2014. This equates to 170 dwellings.

Therefore, as a result of the analysis undertaken by the SHLAA, it is concluded that a total of 367 dwellings will be delivered from extant planning permission by 2014. This is 43% of the amended reduced residual housing target of 849 dwellings, and would mean that new allocations are only needed to provide 482 dwellings.

Extant planning permissions are recognised by the SHLAA as a distinct and identified source of housing supply. It is a supply that is normally taken into account in DPDs before allocating new sites for housing development, subject to assessment of their deliverability by the SHLAA in accordance with paragraph 58 of PPS3. The SHLAA undertakes this necessary assessment and concludes very positively that subject to some minor discounting the extant permissions comprise a substantial and deliverable source of supply.

The DPD, however, makes no allowance for extant permissions, and simply assumes that the reduced residual housing target is a target for 'allocations' – for example it is called such in paragraph 5.6 of the submitted DPD. By making this assumption, and making no allowance for extant planning permissions, new allocations are made in the DPD for a total of 865 dwellings – entirely on greenfield land.

The allocations made, together with the extant planning permissions recorded in the SHLAA, mean that a total of 1,232 new dwellings will be provided in the DPD area by 2021. This is an over provision of 45% on the amended residual housing target of 849 dwellings. This is a significant over provision.

In particular, we are concerned that this over provision will arise in the Phase 1 period, as it will be during this period that all the extant permissions are expected to be completed. Indeed, with 113 net new completions recorded for 2008/09 (see Annex 1 to this statement) a good proportion (30%) of the extant permission recorded as at 31st March 2008 in the SHLAA have actually been developed in just one year.

It is also the case that further planning permissions have been granted during 2008/09. From monitoring information provided to us by Kent County Council planning permission for 126 dwellings were permitted during 2008/09 (157 permitted less 31 losses - see Annex 2 to this statement) – though we acknowledge that some of the extant permissions recorded in the SHLAA for March 2008 will have now been converted to completions and some may have expired (or have been renewed), so these new permissions cannot simply be added to those presented in the SHLAA.

We consider, however, that the net effect of updating the completions and extant permissions to 2009 will be an increase in the existing supply rather than a reduction.

It is our view that in allocating significantly more greenfield land for development than is actually needed to meet both the South East Plan and Core Strategy housing target for the rural area, the DPD is unsound. We consider that the DPD is inconsistent with national planning policy (PPS1, PPS3, PPS7 and PPG13); the South East Plan (policies SP3, CC1, CC2, CC3, C3 and C4); and the Core Strategy (policies CS1, CS6 and CS15), all of which seek to ensure:

- sustainable development that minimises transport and the use of resources;
- that the focus of development should be on brownfield land; and
- that the natural environment should be protected from unnecessary development.

Whilst we are very concerned that no regard or allowance has been made for extant planning permissions resulting in the unnecessary allocation of greenfield sites, we do not advocate that planning for the rural area should be driven strictly and solely by meeting housing numbers. We are acutely aware that rural communities have housing needs and demands for services and facilities which will require some flexibility to address these issues. However, it is unclear to us whether or not the significant pool of extant planning permission have been assessed to see how they will contribute to addressing these issues, and how the proposed allocations will complement and sit alongside this already planned development.

It is our view that if regard is given to the extant planning permissions a different approach to land allocations would and should have been made to ensure that new land releases are targeted where they would deliver the maximum community gain in terms of providing affordable housing and providing support for existing and new community services and facilities. This is especially the case if new allocations mean that the prescribed housing target will be exceeded, as this needs to be robustly justified.

Consequently, we consider that the DPD as currently presented is unsound and the allocations proposed need to be fundamentally reviewed to ensure that any overprovision, especially in the phase 1 period, will achieve specific benefits for local communities having regard to the role that extant planning permissions will also play in this.

2.4: What assessment is there of changes in the number, distribution, prosperity and structure of the local population which might drive rural housing needs?

No comment.

Annex 1: Housing Completions in the Rural Area during 2008/09

Annex 2: Planning Permissions granted in the Rural Area during 2008/09

(Source: Kent County Council annual housing monitoring)