

Home Builders Federation

Representor Number 412

Hearing Session: Issue 5

ASHFORD LOCAL PLAN EXAMINATION

Issue 5: Will the Local Plan meet the housing requirement over the plan period? Will there be a 5 year supply of deliverable housing sites with an appropriate buffer?

i) Are the assumptions and analysis regarding site suitability, availability and achievability and development capacity in the Strategic Housing and Employment Land Availability Assessment (SD12) reasonable and realistic? Is this assessment sufficiently comprehensive and rigorous having regard to the PPG on Housing and economic land availability assessment (ID3)?

We are concerned that the policies relating to windfall residential development (HOU3a and HOU5) and policies relating to the loss of employment land in EMP2 will limit the number of homes coming through windfall development compared to previous years. This situation is compounded given that it would appear that the Council is continuing to include garden land within its windfall assessment. No analysis has been shown in the SHELAA (SD12) as to how many of the units delivered over the last ten years have been on garden land and as such would now not be expected to come forward given policies in the NPPF. So whilst the rate of windfall delivery would not appear unreasonable based on past trends the Council must undertake the appropriate analysis of this data, alongside the relevant policies in the local plan to ensure its evidence sufficiently robust and reliable.

ii) Are the sites relied upon for the supply of housing deliverable and developable in accordance with paragraph 47 of the NPPF? Does the evidence provided in Appendices 1 and 2 of the Housing Topic Paper (SD08) give sufficient confidence that sites will be delivered as anticipated? Is there an over-reliance on large site allocations?

No comment

iii) What should be the starting date for the consideration of a 5 year supply?

We would consider 2018/19 to be the most appropriate year from which to begin any assessment of the five year housing land supply as this is the period in which the local plan, if found sound, would be adopted.

iv) How is any shortfall in delivery since the start of the plan period to be dealt with? Should this undersupply be dealt with within the first 5 years or over a longer period? Should the shortfall be calculated against the Strategic Housing Market Assessment (SD13) figure of 825 dwellings per annum or the annual housing target in Table 1 of 848

dwelling per annum? Is the application of a 20% buffer in addition to the annualised housing target and the shortfall since 2011 justified?

The Government have established through PPG that: “Local planning authorities should aim to deal with any undersupply within the first 5 years of the plan period where possible.” The importance of addressing the backlog within five years is to ensure that those unmet needs do not continue well into the plan period reducing the effectiveness of the plan in seeking to meet needs and address on-going affordability concerns.

The application of the 20% buffer is justified and consistent with national policy. Paragraph 47 of the NPPF states that “Where there is a record of persistent under delivery of housing Local Planning Authorities should increase the buffer to 20%”. This level of buffer is applied in recognition that there is no certainty based on past delivery that the Council will meet its required level of supply. As such it is necessary to bring forward supply from later in the plan period to bolster its 5 year supply of housing.

The Council have noted in paragraph 212 of its Housing Topic Paper that in adhering to the Sedgefield methodology (which is in line with national policy) adversely affects the appropriate model for sustainable development taken forward in this plan – principally that development should go towards Ashford and its immediate surrounding areas. However, the Sustainability Appraisal (SD02) notes that delivering a proportionate amount of development away from Ashford is a sustainable approach to meeting housing needs. The Council’s continued adherence to the consideration that development outside of Ashford is “far less sustainable and more sensitive to housing growth” (paragraph 19 of the Housing Topic Paper) could be considered as preventing the Council from allocating smaller sites away from Ashford that would bolster its five year housing land supply and provide for a more proportionate response that remains sustainable. Whilst we are supportive of the increased number of allocations to rural areas we continue to consider that these areas could accommodate more development. One example we have identified is Tenterden. It must be remembered that in considering sustainability it is important to recognise that meeting housing needs is not purely a benefit for urban communities but also one that will have benefits for those settlements supporting rural communities.

v) Is the housing trajectory at Appendix 5 realistic and does it form an appropriate basis for assessing whether sites are deliverable in line with footnote 11 of the NPPF?

No comment

vi) Does the contingency buffer of over 1,000 dwellings provide sufficient flexibility to accommodate unexpected delays whilst maintaining an adequate supply?

The inclusion of a buffer is welcomed by the HBF. However, this may be insufficient. We would like to refer the inspector to the DCLG presentation slide from the HBF Planning Conference September 2015 (see below). This slide illustrates 10 – 20% non-implementation gap together with 15 – 20% lapse rate. The slide also suggests “the need to plan for permissions on more units than the housing start / completions ambition”. It is acknowledged that this presentation slide shows generic percentages across England

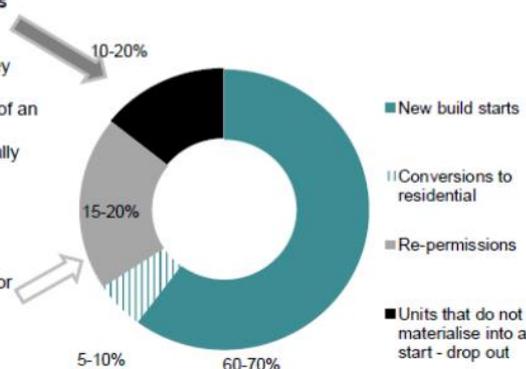
but it provides an indication of the level of flexibility within the overall housing land supply that the Council should be providing. The Council's contingency of 1007 dwellings (7.7%) is below the recommendations of DCLG therefore it is unlikely to provide sufficient flexibility for unforeseen circumstances.

 Department for Communities and Local Government

In recent years there has been a 30-40% gap between permissions and housing starts

- **Gap of around 30-40%** between the number of permissions given for housing and starts on site within a year. Estimate that for a year's permissions for housing around:
- **10-20%** do not materialise into a start; the permission **'drops out'**: this could be because -
 - the landowner cannot get the price for the site that they want
 - a developer cannot secure finance or meet the terms of an option
 - the development is later not considered to be financially worthwhile
 - there are supply chain constraints hindering a start.

There may be scope to reduce this through policy.
- **15-20%** are not abandoned but a **re-permission** is sought, for example to make a major change to plans or to extend the development period.



- Recent data and realities of private market suggests need to **plan for permissions on more units than housing start/completion ambition.**

Extract from slide presentation “DCLG Planning Update” by Ruth Stanier Director of Planning - HBF Planning Conference Sept 2015

vii) Has the Council made reasonable assumptions about average densities in Table 1 of the Strategic Housing and Employment Land Availability Assessment (SD12) bearing in mind PPG advice (ID3-017-20140306)? Has this been translated into the capacity estimates for allocated sites?

No comment

viii) Is the approach to windfall sites justified having regard to paragraph 48 of the NPPF? Why is it assumed that there will be 150 windfall units in 2021 and 100 from 2022-2030? Having regard to paragraph 48 of the NPPF should windfall sites be included in the 5 year supply? Is the 25% non-delivery rate of extant windfalls reasonable?

We are concerned that the policies relating to windfall residential development (HOU3a and HOU5) and policies relating to the loss of employment land in EMP2 will limit the number of homes coming through windfall development compared to previous years. This situation is compounded given that it would appear that the Council is continuing to include garden land within its windfall assessment. No analysis has been shown in the SHELAA (SD12) as to how many of the units delivered over the last ten years have been on garden land and as such would now not be expected to come forward given policies in the NPPF. So whilst the rate of windfall delivery would not appear unreasonable based

on past trends the Council must undertake the appropriate analysis of this data, alongside the relevant policies in the local plan to ensure its evidence sufficiently robust and reliable.

It is less likely for windfall sites to come forward in the first five years of a plan, especially where smaller sites, which form the majority of windfall development, are allocated in the plan. A 25% non-delivery rate on extant permission is reasonable when considering windfalls within the five year supply. This recognises and accounts for delays in delivery such as from changes in ownership, amendments to planning permissions and changing economic circumstances.

ix) Does the Local Plan contain a housing implementation strategy describing how delivery of a five year supply of housing land to meet the housing requirement will be maintained in accordance with paragraph 47 of the NPPF?

No comment

x) How would the supply of housing sites be monitored and managed?

No comment

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