

Matter 8 – The supply and delivery of housing land

Issue

Whether the approach towards the supply and delivery of housing land is positively prepared, justified, effective and consistent with national policy.

Question 2: What is the estimated supply from each source for the plan period? What is the evidence to support this and are the estimates justified?

We are concerned that limited evidence is available to support the Indicative Housing Trajectory and thus the plan periods, along with conflicting evidence for housing delivery at the New Garden Settlement.

EX004 Appendix 1: Housing trajectory for Submission Core Strategy Review sets out anticipated year-by-year housing delivery by: Windfall Allowance; Planning Permission and Sites Under Construction (31 March 2019); Core Strategy (without planning permission; Places and Policies Local Plan (without planning permission); and New Garden Settlement. However, only EB 03.10 Appendices 2 and 3 provide detailed information on a site-by-site basis for the first five-year period (2019/20 to 2023/24). With regard to the New Garden Settlement, the Core Strategy at paragraph 4.63 states that the contribution (net dwellings) for the period 2019/20 to 2036/37 will be 5,925.

The Otterpool Park planning application provides a range – from 4,350 to 6,175. These are set out in the Otterpool Park Application Document 3.3 Planning and Delivery Statement, February 2019 at paragraph 9.20 which reads: *“The pace of delivery will be informed by market demand but it is anticipated that the rate of delivery will be within the following ranges:*

Table 9.1 Housing Delivery Rate (Otterpool Park Housing Strategy, January 2019)

<i>Year</i>	<i>Annual Delivery Rate – Lower</i>	<i>Cumulative Total - Lower</i>	<i>Annual Delivery Rate – Upper</i>	<i>Cumulative Total - Upper</i>
<i>1-2 (2020-2021)</i>	-	-	-	-
<i>3-5 (2022-2024)</i>	150	450	325	975
<i>6-14 (2025-2033)</i>	300	3150	400	4575
<i>15-22 (2034-2041)</i>	300	5550	450	8175
<i>23 (2042)</i>	300	5850	325	8500
<i>24-31 (2043-2050)</i>	300	8250	-	-

[<https://www.folkestone-hythe.gov.uk/downloads/file/3391/planning-and-delivery-statement>]

Policy SS6 would therefore require development rates at the upper level throughout the whole of the plan period. We are unable to find any evidence to support the use of the Upper rates. CPRE Kent remains concerned that the plan still assumes an unrealistic delivery programme at the New Garden Settlement. See also CPRE Kent response to Matter 3 question 4.

Question 6: What is the evidence to support this and are the estimates justified?

As set out in our response to Matter 3 Question 3 we can only find limited evidence to support the EB 03.10 Indicative Housing Trajectory for the first 5 years:

- Appendix 2: Five Year Housing Land Supply Tables 1 and 2 do not appear to be supported by evidence. We have not been able to find any evidence for sites beyond the five-year period.
- Appendix 3: Extant Planning Permissions provides some information for the 5 year-land supply. Tables 3 and 4 provide a column ‘Information based on’ which is either ‘Agent correspondence’ or ‘Officer knowledge’; and ‘Notes’ which either say that the site is ‘under construction’ or no note is provided. There is no evidence to support the approach set out for each site. There is also no way of understanding the basis for the inclusion of sites that do not benefit from any note. We have not been able to find any evidence for sites beyond the five-year period.

Core Strategy Review: Revised Housing Need and Supply (EB.03.10) at Appendices 2 and 3 set out five year housing supply and extant planning permissions expected to be delivered in the first five years as 3,947:

Source of housing supply	Five-year capacity 2019/20 – 2023/24
Appendix 2	
Appendix 2: Table 1: Core Strategy Review – anticipated 5-year supply	735
Appendix 2: Table 2: Places and Policies Local Plan: anticipated 5-year supply	632
Appendix 3: Table 3: Extant Planning Permissions as at 1 April 2019: Ten or more net new dwellings	2246
Table 4: Extant Planning Permissions as at 31 March 2019: Nine or less net new dwellings	336
Total	3947

It is noted that EX004 increases this figure marginally to 3,982 as ‘A minor adjustment has been made where an error was found. (paragraph 3.1)

This results in an annual average of 796 dwelling completions per annum. We submit this is optimistic when compared with past delivery rates and the current state of the economy. It may be appropriate for the purpose of estimating future land supply but a more cautious approach should be taken for setting short-term housing targets. More realism would

reduce the risk of the Council falling behind its targets in the early years and, in time, reduce the risk of un-planned development should deliverable land supply fall below the 5-year target.

Question 9: What is the evidence to support this and are the estimates justified?

CPRE Kent has been unable to find evidence in the Examination Library regarding any housing land availability assessment for years 6-10 and 11-15. The only evidence that we could find was in the Places and Policies Local Plan Evidence Base Library document 3.2 SHLA May 2018 which considers 31 sites.