
HEARING STATEMENT
MATTER 8 – HOUSING LAND SUPPLY

12 APRIL 2019

THANET DISTRICT LOCAL PLAN EXAMINATION

Prepared on Behalf of
Ptarmigan Land
[Representor Id – 493]

March 2019

HEARING STATEMENT
THANET DISTRICT LOCAL PLAN EXAMINATION
MATTER 8 – HOUSING LAND SUPPLY
12 APRIL 2019
Prepared on behalf of
Ptarmigan Land
March 2019

Project Ref:	26281/A5
Status:	FINAL
Issue/Rev:	01
Date:	19 March 2019
Prepared by:	Joshua Mellor
Checked by:	Andrew Wilford
Authorised by:	Andrew Wilford

Barton Willmore LLP
The Observatory
Castle Hill Drive
Castle Hill
Ebbsfleet Valley
Kent
DA10 1EE

Tel: 01322 374660
Email: andrew.wilford@bartonwillmore.co.uk

Ref: 26281/A5/JM/kf
Date: 19 March 2019

COPYRIGHT

The contents of this document must not be copied or reproduced in whole or in part without the written consent of Barton Willmore LLP.

All Barton Willmore stationery is produced using recycled or FSC paper and vegetable oil based inks.

CONTENTS

	PAGE NO.
1.0 INTRODUCTION	01
2.0 RESPONSE TO MATTER 8 – HOUSING LAND SUPPLY	02

APPENDICES

APPENDIX 1 – THANET DISTRICT COUNCIL ANNUAL MONITORING REPORT 2018

APPENDIX 2 – HOUSING TRAJECTORY OPTIONS

Word Count: 1,738 words (excluding Inspector's Questions and title pages)

1.0 INTRODUCTION

- 1.1 This Hearing Statement has been prepared on behalf of Ptarmigan Land in respect of Matter 8 relating to Thanet District Council's (TDC) five-year housing land requirement, supply methodology and components of supply.

2.0 RESPONSE TO MATTER 8 – HOUSING LAND SUPPLY

Matter 8 Issue 1 – Five-Year Housing Land Requirement

On1.1 What is the basic five-year housing land requirement, what is it based on and how has it been calculated?

- 2.1 Full objectively assessed need has been calculated as 857 dwellings per annum across the Plan period (2011 – 2031) (Updated Assessment of Objectively Assessed Housing Need, CD4.1). The full objectively assessed need figure has been calculated through a robust methodology (see our response to Matter 2).
- 2.2 On this basis the basic five-year requirement is 4,285 dwellings.
- 2.3 TDC has however proposed a stepped approach to meeting housing requirements across the Plan period.
- 2.4 On the basis of the housing trajectory set out in Policy SP11 the five-year housing land requirement for 2018/19 – 2022/23 is 4,900 dwellings (900dpa x 3 + 1,100dpa x 2).
- 2.5 Barton Willmore has put forward an alternative trajectory (see our Matter 2 statement and Qn5.3 below) resulting in a five-year housing land requirement for 2018/19 – 2022/23 of 4,200 dwellings (600dpa x 3 + 1,200dpa x 2).

On1.2 How does the five-year housing land requirement compare to previous rates of delivery?

- 2.6 TDC's latest Annual Monitoring Report 2018 (AMR, included in **Appendix 1**) confirms TDC was able to demonstrate strong delivery against its requirements between 2006/07 -2010/11 following adoption of the 2006 Local Plan (on a requirement of 375 dwellings per annum).
- 2.7 From 2011/12 onwards TDC has not met its increased housing requirement. In its latest monitoring year (2017/18) TDC delivered 238 dwellings.
- 2.8 Page 11 of the AMR attributes the reduction in completions since 2011 to the economic slowdown experienced nationally.
- 2.9 The graph in **Appendix 2** includes completion data from 2006 onwards plotted against housing requirements.

On1.3 Taking a longer-term view, how has the Council performed against previous annual housing requirements? Does this represent the 'persistent undersupply' defined by the Framework? In this context, should the buffer be 5% or 20%?

- 2.10 In line with the transitional arrangement of the National Planning Policy Framework 2019 (NPPF 2019) the Plan is being assessed on the basis of the National Planning Policy Framework 2012 (NPPF 2012). Nevertheless, the NPPF 2019 Housing Delivery Test requirements continue to apply for TDC.
- 2.11 The Housing Delivery Test 2018 Measurement (published 19 February 2019) confirmed, against a 3-year rolling delivery requirement of 2,204 dwellings, TDC delivered 977 dwellings across the period 2015/16 to 2017/18 (i.e. 44% of the requirement).

Table 2.1 TDC Housing Delivery Test 2018 Results

Number of homes required			Total required	Number of homes delivered			Total delivered	HDT 2018 Result
2015/16	2016/17	2017/18		2015/16	2016/17	2017/18		
703	709	793	2,204	350	389	238	977 (44%)	20% buffer applied

- 2.12 Paragraph 73 (bullet c) of the NPPF 2019 confirms delivery under 85% of the requirement represents significant under delivery and in those circumstances a 20% buffer applies, to improve the prospect of achieving planned supply.
- 2.13 TDC is therefore already subject to a 20% buffer on account of the significant under delivery against Housing Delivery Test requirements. The 20% buffer applies for the five-year housing land supply requirement.

On1.4 If a 20% buffer applies, should this be applied to the basic five-year requirement, or the five-year requirement and any undersupply?

- 2.14 The 20% buffer applies across the five-year requirement plus any undersupply.

On1.5 If there has been an undersupply, should this be addressed within the next five years (the 'Sedgefield' method), or over the remainder of the plan period (the 'Liverpool' method)? Is the Council's approach consistent with the PPG which advises that local planning authorities should aim to deal with any undersupply within the first 5 years of the plan period where possible?

- 2.15 Planning Practice Guidance identifies that levels of deficit from the start of the Plan period should be addressed in the next 5 -year period ('Sedgefield'). However, it is acknowledged that the 'Liverpool' approach may be acceptable for strategic policy-making authorities to address past under delivery over a longer period (Reference ID: 3-044-20180913).
- 2.16 There remains a need for TDC to deliver housing growth quickly to assist in making up past shortfall and meet its housing requirements across the Plan period.
- 2.17 TDC's proposed spatial strategy includes the delivery of 7no. Strategic Sites which will deliver a significant proportion of Plan growth. The Strategic Sites will deliver strongest towards the middle and end of the Plan period, alongside the delivery of associated infrastructure including the Inner Circuit road which is a key element of TDC's Draft Transport Strategy (CD6.1).
- 2.18 Para 3.9 of the Local Plan (CD1.1) confirms a stepped approach to meeting housing needs is proposed, in light of the significant infrastructure requirements needed to support new development. The stepped approach results in a housing requirement of 900 dwellings per annum from 2016/17 – 2020/21, rising to 1,100 dwellings per annum from 2021/22 – 2025/26.
- 2.19 Table 2.2 compares TDC's 5-year housing land supply requirements when using the Liverpool and Sedgefield approach.
- 2.20 Given the shortfall from the start of the plan period (and anticipated over the next couple of years) and the step change necessary to meet housing needs across the Plan period, through the allocation and delivery of Strategic Sites, on this occasion we consider the Liverpool approach is appropriate **for the first 5-year period post adoption only, thereafter defaulting to Sedgefield.**
- 2.21 Following the first 5 years post adoption (i.e. from 2023/24 onwards), at which time Strategic Sites will be delivering and the shortfall being addressed, the Sedgefield approach should be applied for the remaining 8no. years of the Plan.
- 2.22 Table 2.2 demonstrates neither approach results in TDC demonstrating a 5-year housing land supply post adoption. This is discussed further and the need for a revised stepped approach at Qn5.3 below.

Table 2.2 TDC 5 Year Housing Land Supply Assessment Comparison

Sedgefield	5 YEAR HOUSING LAND SUPPLY ASSESSMENT			Liverpool
17,140	Total Plan Requirement 2011 – 2031			17,140
3,355	Requirement 2011/12 – 2017/18 ¹			3,355
2,192	Completions 2011/12 – 2017/18			2,192
1,163	Shortfall since Plan period began (2011)			1,163
4,900	Requirement 2018/19 – 2022/23 (900dpa x 3 + 1,100dpa x 2)			4,900
1,163	All in 5 years	Inclusion of identified shortfall	1,163 / 13 x 5 years	447
6,063	4,900 + 1,163	Revised 5 year requirement	4,900 + 447	5,347
1,213	20%	Plus HDT Buffer	20%	1,069
7,276 (1,455dpa)	6,063 + 1,213	Revised Total 5 year requirement 2018/19 – 2022/23	5,347 + 1,069	6,416 (1,283dpa)
6,345	Supply of Housing 2018/19 – 2022/23			6,345
4.36	Supply in Years			4.95

Qn1.6 Taking the above into account, what is the five-year housing land requirement?

- 2.23 Table 2.2 above confirms, on the basis of the Liverpool approach, the five-year housing land requirement on TDC's current stepped approach is 6,416 dwellings.

Matter 8 Issue 2 – Supply Methodology

Qn2.6 What evidence is there to indicate that the sites without planning permission will come forward as illustrated in the housing trajectory?

- 2.24 TDC has undertaken its own assessment of when sites without permission (Strategic and non-strategic housing sites) are likely to begin delivering, based on information submitted by landowners/promoters through previous call-for-site exercises.

¹ Calculation of housing requirement is not based on OAN (857dpa) but based on planned growth (1,555 dwelling across 2011-16 + 900dpa x 2 across 2016/17 and 2017/18)

- 2.25 Phasing information for the Strategic Sites is in the process of being refined through agreement between the site promoters and TDC who are entering into Statements of Common Ground.
- 2.26 The Statement of Common Ground for Policy SP14 includes a trajectory agreed between the Birchington Strategic Site Promoters and TDC. This also includes a Deliverability Statement prepared by the Promoters which confirms 50 dwellings will be delivered on the Strategic Site during the 2021/22 monitoring year, in line with the agreed trajectory.

Qn2.7 Have the same lead-in times and build-out rates been applied to sites without planning permission? How do they vary?

- 2.27 The Statement of Common Ground for Policy SP14 includes an agreed revised phasing schedule which provides a realistic lead-in time and build-out rates based on the prior experience of the individual promoters.
- 2.28 TDC has requested similar phasing information from other Strategic Site Promoters and needs to ensure updated phasing information is reflected in its trajectory and housing land supply calculations.

Matter 8 Issue 3 – Components of Supply

Qn3.1 What evidence is there to support the housing trajectory for Birchington (Policy SP14)? Does this adequately reflect the time it will take to bring development forward and the necessary infrastructure requirement for the Site?

- 2.29 The Birchington Strategic Site is being promoted by a strategic land promoter, with prior experience in delivering sites of this size, and a developer, with a proven track record of housing delivery.
- 2.30 A revised housing trajectory has been agreed between TDC and the Birchington Strategic Site Promoters which demonstrates how housing will be delivered on the site across the Plan period.
- 2.31 A Deliverability Statement is included as part of the Statement of Common Ground for Policy SP14 which confirms the Promoter's intentions to submit an application for the Birchington Strategic Site in late 2019 and deliver the first 50 dwellings on site during the 2021/2022 monitoring year. This reflects the fact the site is being promoted by experienced development partners and the site is largely unconstrained by infrastructure, planning, environmental and other technical constraints.

- 2.32 The Birchington Strategic Site includes part of the Strategic Route identified in Policy SP47 which will form the main access into the site and link road through it. All land necessary to deliver this Strategic Route through the site is under the control of the promoters who can therefore deliver this at the necessary time.

Matter 2 Issue 5 – Future Supply

On5.2 What factors were considered in arriving at the figures in the Housing Trajectory? Are they justified and based on appropriate available evidence?

- 2.33 The trajectory for the Birchington Strategic Site has been agreed through the Statement of Common Ground for Policy SP14 and prepared on the prior knowledge and experience of Ptarmigan Land, a strategic site promoter, and Millwood Designer Homes, a housing developer.
- 2.34 TDC has requested updated phasing information from Strategic Site Promoters to update the phasing information included within the Plan. The Plan Housing Trajectory will be required to be updated on this basis.

On5.3 Is there likely to be a sufficient supply of housing land throughout the lifetime of the Plan?

- 2.35 Yes. As detailed in Table 3 (page 32) of the Local Plan (CD1.1) 18,195 dwellings are identified to be delivered across the Plan period through a variety of sources of supply. 8,939 dwellings are identified to be delivered on allocation sites.
- 2.36 Table 2.2 above confirms, based on the 'Liverpool' approach, TDC will have a marginal under-supply (4.95 years) across the next five years. Based on TDC projections (as replicated in Appendix 1) this will improve.
- 2.37 Nevertheless, TDC is required to demonstrate a five-year supply at the point of adoption. Barton Willmore has put forward an alternative trajectory addressing this point, as shown in Table 2.3 below.
- 2.38 The Barton Willmore alternative trajectory is also discussed in our Matter 2 Statement, the proposed housing trajectory in Table 2.3 is consistent with our proposals for Matter 2.
- 2.39 Table 2.4 demonstrates the Barton Willmore trajectory results in a five-year supply, at the point of adoption, on the basis of both the Liverpool and Sedgefield approach.

2.40 The alternative trajectory has been plotted onto a graph in **Appendix 2** to demonstrate its suitability against projected supply.

Table 2.3 Proposed Barton Willmore Trajectory (Bold = Amendment to Policy SP11)

	Total Dwellings	Per annum	AMR 2018 Completions / Projection	AMR 2018 Rolling completions
2011 – 2016	1,555	311dpa	1,555	1,555
2016 – 2021	3,000	600dpa	2,816	4,371
2021 – 2026	6,000	1,200dpa	8,245	12,616
2026 - 2031	6,585	1,317dpa	5,400	18,016
2011 - 2031	17,140	857dpa		

Table 2.4 Proposed Barton Willmore Trajectory Housing Land Supply Assessment

Sedgefield	5 YEAR HOUSING LAND SUPPLY ASSESSMENT – BARTON WILLMORE TRAJECTORY			Liverpool
17,140	Total Plan Requirement 2011 – 2031			17,140
2,755	Requirement 2011/12 – 2017/18 (1,555 dwelling across 2011-16 + 600 dpa x 2 across 2016/17 and 2017/18)			2,755
2,192	Completions 2011/12 – 2017/18			2,192
563	Shortfall since Plan period began (2011)			563
4,200	Requirement 2018/19 – 2022/23 (600 dpa x 3 + 1,200 dpa x 2)			4,200
563	All in 5 years	Inclusion of identified shortfall	563 / 13 x 5 years	43
4,763	4,200 + 563	Revised 5 year requirement	4,200 + 43	4,243
953	20%	Plus HDT Buffer	20%	849
5,716 (1,143dpa)	4,763 + 953	Revised Total 5 year requirement 2018/19 – 2022/23	4,243 + 849	5,092 (1,018dpa)
6,345	Supply of Housing 2018/19 – 2022/23			6,345
5.55	Supply in Years			6.23

Matter 2 Issue 6 – Flexibility***Qn6.1 What flexibility does the plan provide if some of the larger sites do not come forward in the timescales envisaged?***

- 2.41 The Plan has no specific mechanism for review should delivery not meet TDC's envisaged trajectory.
- 2.42 Nevertheless, there remains a legal requirement through Regulation 10A of The Town and Country Planning (Local Planning) (England) (Amendment) Regulations 2017 for Local Plans to be reviewed every five years.
- 2.43 The need for five-year reviews is reflected in Paragraph 33 of the National Planning Policy Framework 2019 confirming this should take into account changing circumstances affecting an area.
- 2.44 This review mechanism allows TDC to review the progress of Strategic Sites and take necessary action, including allocation of alternative/additional sites if necessary at the relevant time.

Qn6.2 Is it necessary to have a review mechanism in the Plan to consider progress against these, and other sites, and to identify any appropriate steps to increase supply if required?

- 2.45 The legal requirement for Local Plan reviews every five years ensures TDC can suitably monitor the progress of housing delivery and identify, at the appropriate time, remedial action if necessary.
- 2.46 Further, TDC has been directed by the Secretary of State for Housing, Communities and Local Government (28 January 2018) to update its Local Development Scheme within six months of adoption of the Plan to provide for the completion of a review.
- 2.47 These measures together with the consequence of not delivering housing at a required rate (Housing Delivery Test and the Presumption in favour of Sustainable Development) provide steps for TDC and/or others to increase supply if required.

2.48 Nevertheless, we support an additional policy being included as part of the Plan to allow a partial review should the Development Consent Order for Manston Airport not be granted. The refusal of the Development Consent Order would release this major brownfield site for development, with the current owners/promoters (Stone Hill Park) favouring a residential-led mixed use scheme on the site. This has implications on the infrastructure requirements of the Plan which would need to be addressed through a partial Plan review prior to development being consented on the Site.

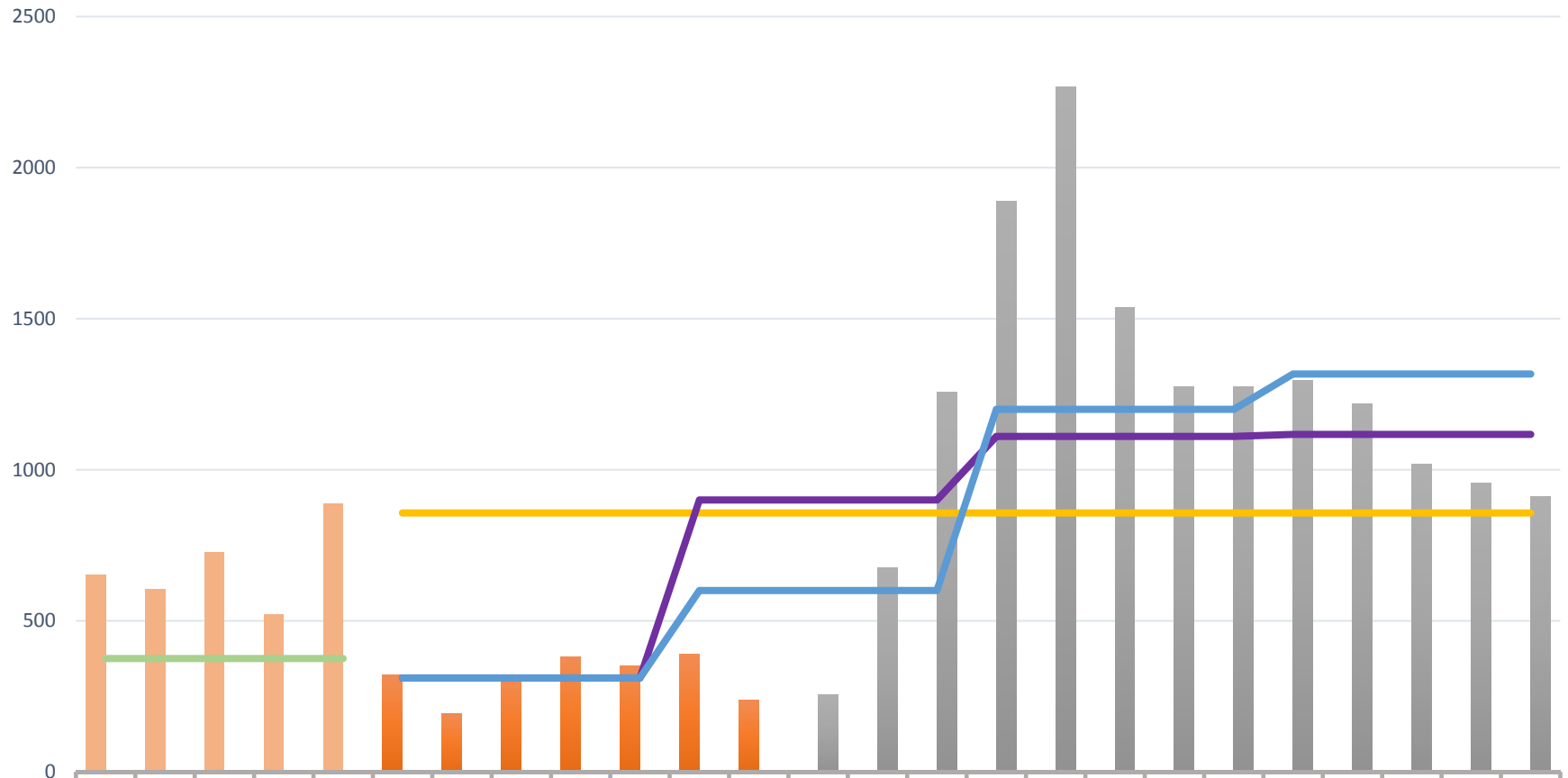
APPENDIX 1

THANET DISTRICT COUNCIL ANNUAL MONITORING REPORT 2018

APPENDIX 2

HOUSING TRAJECTORY OPTIONS

Thanet Housing Trajectory



	2006/ 07	2007/ 08	2008/ 09	2009/ 10	2010/ 11	2011/ 12	2012/ 13	2013/ 14	2014/ 15	2015/ 16	2016/ 17	2017/ 18	2018/ 19	2019/ 20	2020/ 21	2021/ 22	2022/ 23	2023/ 24	2024/ 25	2025/ 26	2026/ 27	2027/ 28	2028/ 29	2029/ 30	2030/ 31
■ Actual Delivery (AMR 2018)	651	606	726	520	889	320	194	321	380	350	389	238													
■ Projected Delivery (AMR 2018)													256	676	1257	1889	2267	1538	1276	1275	1297	1219	1018	956	910
— Avg Trajectory						857	857	857	857	857	857	857	857	857	857	857	857	857	857	857	857	857	857	857	857
— TDC Trajectory						311	311	311	311	311	900	900	900	900	900	1110	1110	1110	1110	1110	1117	1117	1117	1117	1117
— BW Alternative Trajectory						311	311	311	311	311	600	600	600	600	600	1200	1200	1200	1200	1200	1200	1317	1317	1317	1317
— Local Plan (2006) Requirement	375	375	375	375	375																				
Rolling Trajectory Completions					17140	16820	16626	16305	15925	15575	15186	14948	14692	14016	12759	10870	8603	7065	5789	4514	3217	1998	980	24	-886