

**Home Builders Federation**

**ID:2007**

**Matter 2**

## **SEVENOAKS LOCAL PLAN EXAMINATION**

### **Matter 2: Soundness of the Local Plan**

**Issue 6: Is the Local Plan positively prepared, justified, and effective in respect of housing?**

*Housing Need* [Policy ST1]

*Q35. Does the Local Plan clearly set out the Council's objectively assessed housing need for the Plan period having regard to the NPPF and Planning Practice Guidance [PPG] which require that a local housing needs assessment using the standard method in national planning guidance should be used to determine the minimum number of homes needed, with the baseline set using the 2014-based household projections?*

Whilst the level of housing need is mentioned at paragraph 1.5 of the Local Plan, we would suggest this needs to be more clearly highlighted and indicate the level of unmet needs created by this plan.

*Q36. The Local Plan, as submitted, refers to the housing need as 13,960 dwellings over the period 2015-2035, or 698dpa. Should this be updated from 698dpa (in the submitted Plan) to 707dpa (in the Schedule of Amendments) or 11,312 dwellings over the period 2019-2035, based on the projected household growth for 2019-2029 rather than 2018-2028?*

Planning Practice Guidance sets out that the starting point for assessing local housing needs assessment should be the current year. We would therefore agree that the



annual level of growth that should be accommodated is 707 dwellings per annum. On the basis of national policy, we would agree that it is logical that the plan period be readjusted to start from 2019 and that delivery between 2015 to 2018 be removed from the delivery expectation as is suggested by the Council. However, this is largely immaterial as the Council are not intending on meeting housing needs and will still be 1,902 homes, nearly 17%, short of meeting needs.

Q37. Does the Local Plan make it clear that the housing need cannot be met within the Plan period and the reasons for this? Does the Plan propose how this unmet need should be dealt with?

The Plan should clearly set out the level of housing needs required to be delivered by Sevenoaks through this local plan and the shortfall in delivery against these needs. The Council should have then been able to identify where these unmet needs would be met through the duty to co-operate. However, as identified in our statements to matter 1 the Council, and its neighbours, have failed to co-operate effectively and ensure these needs will be met.

**Housing Requirement** [Policy ST1]

Q38. Does the Plan provide for the objectively assessed need for housing to be met in full, as a minimum, in accordance with Paragraph 11.b) of the revised NPPF? If not, would either paragraph 11.b) i. or ii. apply in this case? If so, what is the evidence of factors which prevent the full housing need from being met within the Plan area and should the housing requirement (as opposed to the housing need) set out in the Local Plan reflect this?

No. As set out in our representation we do not think there is a sufficiently strong justification to prevent housing needs from being met due to the application of paragraph 11b)i or 11b)ii. We would suggest that the Council identifies sufficient sites to meet housing needs and that the housing requirement reflect this position.

Q39. As the Plan does not propose to meet the objectively assessed need for housing in full, should the Plan set out clearly the housing requirement and the level of unmet need?

Yes. The housing requirement should be clearly set out in policy. This will ensure that all parties are clear as to the minimum number of homes that the Council will deliver and how it performs in meeting this level of development.

Q40. Should the Plan set out the housing requirement in a policy such as Policy ST1?

Yes.

Q41. Can any neighbouring authorities assist with meeting the unmet housing need in the District? Can the Council demonstrate that it has undertaken effective and on-going joint working with other strategic policy making authorities in order to determine where additional housing could be accommodated to address the unmet housing need that cannot be met within the District?

The Council have not identified how the unmet needs for housing within Sevenoaks will be addressed elsewhere. This is a failure to co-operate effectively and it adds to the circumstances faced by the Council that suggest the need for further sites to be identified and allocated in the local plan to ensure needs are met in full.

Q42. Why is it necessary to amend the Plan period from 2015-2035 in the submitted Plan to 2019-2035?

See response to Q36

### ***Housing Distribution***

Q43. Does the distribution of housing in the Local Plan reflect the spatial strategy of focussing growth in existing settlements, including at higher density; redevelopment of previously developed 'brownfield' land in sustainable locations; and development of Green Belt land only in 'exceptional circumstances'?

No comment

Q44. Should the spatial strategy and distribution of development allow for more development in the Green Belt to meet the objectively assessed housing need?

Yes. If the Council cannot meet its needs on brownfield land, optimising density or in a neighbouring authority then it should remove sufficient land from the Green Belt in order to meet its development needs. The circumstances faced by the Council with regard to needs for affordable housing, poor affordability, and the inability of other authorities to meet needs provide a clear indication that further Green Belt releases are required. It is also the case, as we argue in our representation, that further releases would have limited harm on the Green Belt in this area from achieving its fundamental aim of preventing urban sprawl or on the purposes of Green Belt set out in paragraphs 133 and 134 of the NPPF.

***Housing Supply during the Plan period*** [Policy ST2]

Q45. Have sufficient sites been allocated in the Local Plan to meet the housing requirement? If not, why not?

For Council.

Q46. The Local Plan as submitted seeks to deliver 10,568 dwellings over the Plan period 2015-2035. Should this be updated to 9,410 dwellings over the Plan period 2019-2035?

Yes.

Q47. Has the housing site selection process been based on a sound process of SA and the testing of reasonable alternatives?

No comment

Q48. Does the Local Plan include a Housing Trajectory which illustrates the expected rate of housing delivery over the Plan period in accordance with paragraph 73 of the NPPF? Does it accurately reflect the likely start dates, build out rates and completions of the allocated sites?

We support the proposed amendment to include a trajectory in accordance with paragraph 73.

Q49. On what basis have the likely start dates, build out rates and completions been assumed?

For Council

Q50 and 51. Will each of the allocated sites come forward as expected? Are the housing sites allocated in the Local Plan deliverable and/or developable having regard to the definitions of these terms in the Glossary of the NPPF and what evidence is there to support this?

The HBF does not generally comment on individual allocations, however, we are concerned with the Council's expectation that Pedham Place (ST2-28) will deliver 2,500 homes during the plan period. This is a major development and currently only identified as broad location for development and will only be taken forward following a local plan review in five years' time. This will require the entire level of development proposed at this site to be delivered within 10 years if the review is completed within five years of this plan being adopted. This would appear to be overly ambitious and as such there is no certainty that this can be achieved within these timescales.

Q52. Is Policy ST2 sound – is it effective? Should it be explicit in terms of referring to the level of housing supply proposed to meet the requirement?

No comment

Q53. Should Policy ST2 include reference to the site areas and design guidance in Appendix 2?

No comment

Q54. Is Policy ST2 consistent with national policy given that it refers to sites being included from the previous Plan?

No comment

Q55. Should Policy ST2 specify which sites are allocated for housing and which are mixed use sites?

No comment

### **5 Year Housing Land Supply**

Q57. With regards to paragraph 73c) of the revised NPPF, does the evidence base on the 5-year housing land requirement and supply reflect the Government's HDT results and the revised definition of 'deliverable' included in the glossary of the revised NPPF?

No. The Council's 5-year housing land supply position is considered in document SDC008. This document states that the Council's current housing land supply position is 100.2% (a 5.01 year's supply of land). This calculation uses 707 dpa as the housing requirement for the five-year period and is based on a 5% buffer and a plan period starting at 2019/20. However, we have a number of concerns with regard to this stated position.

We agree that the Housing Delivery Test indicates the use of a 5% buffer in the current period. This is in conformity with the Government's assessment published in February of this year. However, the next Housing Delivery Test (HDT) is due to be published in November and based on the Council's evidence, see table 1 below, can be expected to show that delivery in Sevenoaks will have fallen below the 85% threshold.

**Table 1: Housing Delivery Test**

<b>Year</b>	<b>Required deliver rate</b>	<b>Actual Delivery Rate</b>	<b>Required delivery</b>	<b>Expected delivery in three year rolling period</b>	<b>HDT</b>
2016/17	501	324	n/a	n/a	n/a
2017/18	503	388	n/a	n/a	n/a
2018/19	707	250	n/a	n/a	n/a
2019/20	588	529	1,711	962	56%
2020/21	588	716	1,798	1,167	65%
2021/22	588	912	1,883	1,495	79%

The required delivery rate for the HDT in the first two years of the 3-year rolling average are based on the transitional requirements set out in paragraph 21 to 23 of the HDT rule book. Delivery in the 2018/19 period is required, as set out in paragraph 12 of the rule book, to be the minimum local housing need figure as during this year the Council

did not have an up to date local plan. Therefore, the rolling average for the previously three years will be 56.2% and as such will require the Council to apply a 20% buffer to their five-year housing land supply required.

Q58. Can the Local Plan demonstrate a 5-year supply of deliverable housing land against the requirement upon adoption of the Plan?

Using the Council's suggested requirement in its 5-year housing land supply assessment (SDC008) of 707 dpa and the 20% buffer it can be seen in Table 2 below that the Council will not have a five-year housing land supply on adoption and on that basis the plan as submitted by the Council must be considered unsound.

**Table 2: Five-year land supply – 707 dpa**

	<b>Liverpool method with 5% buffer</b>	<b>Liverpool with 20% buffer</b>	<b>Sedgefield with 5%</b>	<b>Sedgefield with 20%</b>
Basic 5-year requirement 19/20 - 23/24	3,535	3,535	3,535	3,535
Backlog 2013/14 to 2018/19	0	0	0	0
Total 5-year requirement 19/20 - 23/24	3,535	3,535	3,535	3,535
Buffer applied (5%/20%)	3,712	4,242	3,712	4,242
Supply 19/20 to 23/24	3,720	3,720	3,720	3,720
Surplus/shortfall	8	-522	8	-522
<b>Years supply in first five years</b>	<b>5.01</b>	<b>4.38</b>	<b>5.01</b>	<b>4.38</b>

We have also considered the Council's five-year supply against the Council's supply expectations of 9,410 annualised across the plan period – 588 dpa. This shows that using the Sedgefield method the Council will have a marginal 5-year housing land supply on adoption with a surplus of just 192 homes in the first five years.

**Table 2: Five-year land supply 588 dpa**

	<b>Liverpool method with 5% buffer</b>	<b>Liverpool with 20% buffer</b>	<b>Sedgefield with 5%</b>	<b>Sedgefield with 20%</b>
Basic 5-year requirement 19/20 - 23/24	2,940	2,940	2,940	2,940
Backlog 2013/14 to 2018/19	0	0	0	0
Total 5-year requirement 19/20 - 23/24	2,940	2,940	2,940	2,940
Buffer applied (5%/20%)	3,087	3,528	3,087	3,528
Supply 19/20 to 23/24	3,720	3,720	3,720	3,720
Surplus/shortfall	633	192	633	192
<b>Years supply in first five years</b>	<b>6.03</b>	<b>5.27</b>	<b>6.03</b>	<b>5.27</b>

Given that there is no clear evidence provided to show that allocated sites without permission will come forward within 5 years we are concerned that the plan will be out of date on adoption. More evidence must be obtained by the Council to provide some assurance that delivery will come forward as suggested by the Council.

Q59. Is it robustly demonstrated that the Local Plan can deliver a 5-year housing land supply throughout the Plan period?

Alongside considering supply for the first five years of this plan we have also examined the rolling five-year land supply for the plan period. This is set out in appendix 1 of this statement. We have examined delivery of the plan period based on Councils supply expectations of 9,410 (588 dpa). This uses the 20% buffer in the first three years as on the basis of the HDT and the Council's supply such a position will be applicable. It shows that in the Council will not have a 5-year land supply in 2020/21 and 2021/22 and that supply is marginal throughout the plan period. Given the reliance on the delivery of development within broad location identified in policy ST2-28 is ambitious we are concerned that the plan is not deliverable across the whole plan period.



Q60. What evidence is there to show that those sites included in the 5-year housing land supply are deliverable?

The HBF does not comment on individual sites, however for the Council to show that a site is deliverable it must conform with the glossary definition provided in the NPPF. Where a site is allocated and there planning permission has not been granted clear evidence is required. The Council indicate in paragraph 5.3 of SUP008c that they have obtained confirmation from the landowner that the site will be developed within 5 years on the basis of the phasing's suggested by the Council. Whilst we welcome these initial steps in considering a sites deliverability, we would suggest that further information is required to provide "*clear*" evidence that they will come forward as suggested. We would recommend that the Council must be able to show that a housebuilder is involved in allocated sites and that they have confirmed their intention to bring the site forward within 5 years.

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Local Plans Manager – SE and E

## Appendix 1

### Sedgefield – 588 dpa

	19/20	20/21	21/22	22/23	23/24	24/25	25/26	26/27	27/28	28/29	29/30	30/31	31/32	32/33	33/34	34/35
<b>Requirement</b>	588	588	588	588	588	588	588	588	588	588	588	588	588	588	588	588
<b>Cumulative requirement</b>	588	1,176	1,764	2,352	2,940	3,528	4,116	4,704	5,292	5,880	6,468	7,056	7,644	8,232	8,820	9,408
<b>Delivery</b>	529	716	912	863	700	401	384	434	632	539	539	619	615	619	554	354
<b>Cumulative delivery</b>	529	1,245	2,157	3,020	3,720	4,121	4,505	4,939	5,571	6,110	6,649	7,268	7,883	8,502	9,056	9,410
<b>Surplus/ deficit</b>	-59	69	393	668	780	593	389	235	279	230	181	212	239	270	236	2
<b>5-year requirement</b>	2,940	2,940	2,940	2,940	2,940	2,940	2,940	2,940	2,940	2,940	2,940	2,940				
<b>Add deficit/ surplus</b>	2,940	2,999	2,871	2,547	2,272	2,160	2,347	2,551	2,705	2,661	2,710	2,759				
<b>Buffer</b>	588	600	574	127	114	108	117	128	135	133	136	138				
<b>Total requirement</b>	3,528	3,599	3,445	2,674	2,386	2,268	2,464	2,679	2,840	2,794	2,846	2,897				
<b>5-year supply</b>	3,720	3,592	3,260	2,782	2,551	2,390	2,528	2,763	2,944	2,931	2,946	2,761				
<b>Surplus/ deficit</b>	192	-7	-185	108	165	122	64	84	104	137	101	-136				
<b>5-year housing land supply</b>	5.27	4.99	4.73	5.20	5.35	5.27	5.13	5.16	5.18	5.25	5.18	4.77				

### Liverpool – 588 dpa

	19/20	20/21	21/22	22/23	23/24	24/25	25/26	26/27	27/28	28/29	29/30	30/31	31/32	32/33	33/34	34/35
<b>Requirement</b>	588	588	588	588	588	588	588	588	588	588	588	588	588	588	588	588
<b>Cumulative requirement</b>	588	1,176	1,764	2,352	2,940	3,528	4,116	4,704	5,292	5,880	6,468	7,056	7,644	8,232	8,820	9,408



<b>Delivery</b>	529	716	912	863	700	401	384	434	632	539	539	619	615	619	554	354
<b>Cumulative delivery</b>	529	1,245	2,157	3,020	3,720	4,121	4,505	4,939	5,571	6,110	6,649	7,268	7,883	8,502	9,056	9,410
<b>Surplus/ deficit</b>	-59	69	393	668	780	593	389	235	279	230	181	212	239	270	236	2
<b>5-year requirement</b>	2,940	2,940	2,940	2,940	2,940	2,940	2,940	2,940	2,940	2,940	2,940	2,940				
<b>Add deficit/ surplus</b>	2,940	2,954	2,923	2,837	2,754	2,711	2,755	2,810	2,856	2,833	2,844	2,858				
<b>Buffer</b>	588	591	585	142	138	136	138	141	143	142	142	143				
<b>Total requirement</b>	3,528	3,545	3,507	2,978	2,892	2,846	2,892	2,951	2,999	2,974	2,986	3,001				
<b>5-year supply</b>	3,720	3,592	3,260	2,782	2,551	2,390	2,528	2,763	2,944	2,931	2,946	2,761				
<b>Surplus/ deficit</b>	192	47	-247	-196	-341	- 456	-364	-188	-55	-43	-40	-240				
<b>5-year housing land supply</b>	<b>5.27</b>	<b>5.07</b>	<b>4.65</b>	<b>4.67</b>	<b>4.41</b>	<b>4.20</b>	<b>4.37</b>	<b>4.68</b>	<b>4.91</b>	<b>4.93</b>	<b>4.93</b>	<b>4.60</b>				