

## **Examination of the Rother Development and Site Allocations Local Plan**

### **Inspector's Matters, Issues and Questions**

#### **Matter 6: Housing Supply and Delivery**

1. This Hearing Statement has been prepared and submitted by Savills on behalf of Bellway Homes in response to Matter 6 of the Inspector's Matters, Issues and Questions Note issued on 22 March 2019.
2. The Development and Sites Allocation Local Plan (DaSA) is stated by Rother District Council (RDC) to form "Part Two" of the Local Plan with the Core Strategy forming Part One.
3. Bellway Homes has not responded to all questions raised, only to those of relevance which are addressed below. Bellway Homes does not intend to repeat their previous representations made, rather the aim of this statement is to reinforce key points and respond directly to specific matters raised by the Inspector.
4. For information, Bellway Homes currently has an outline planning application (with all matters reserved except for means of access from Clavering Walk) under consideration by RDC at land at Clavering Walk, Bexhill. The application (reference number RR/2018/3127/P) seeks permission for up to 85 homes. Bellway Homes fully intends to bring forward the early delivery of homes, subject to the timely grant of outline planning permission and subsequent reserved matters. Should permission be granted, Bellway Homes would commence on site in February 2020, and anticipates the first delivery of homes in July 2020. Thus the scheme is capable of securing early delivery of much needed housing in this sustainable, accessible edge of settlement location.

#### **Matter 6 – Issue: Is the overall housing supply and delivery assumptions justified, effective and in accordance with the Core Strategy?**

***Will the proposed allocations and other provisions ensure that the Core Strategy requirement of at least 5,700 net additional homes over the period to 2028 will be met?***

5. Of the minimum Core Strategy housing target of 5,700 to be delivered between April 2011 and March 2028, 3,100 homes, equating to 54%, are to be delivered in or around Bexhill. This is the largest, and most sustainable settlement in the District, emphasised by RDC's own high expectations for housing delivery in this location.
6. Despite allocations being made, the DaSA is not clear on how, if at all, the minimum housing target contained in the Core Strategy, will be met.

7. In this regard, RDC states (paragraph 8.6 of the DaSA) that the total residual requirement for housing, when taking into account extant permissions and sites that have been built out (as at 1<sup>st</sup> April 2018), is 1,574 homes and that the proposed allocations, excluding commitments, amounts to 1,381 homes. Assuming these figures are correct, this leaves a shortfall against the minimum target of 193 dwellings.
8. At paragraph 8.7 of the DaSA, RDC then refers to 1,324 homes having been built out, 2,469 homes with planning permission, a windfall allowance of 225 dwellings and exception site allowance of 45 dwellings. This leaves a shortfall against the minimum Core Strategy target of 1,637 dwellings. In this case, the proposed allocations in the DaSA (1,381 units) results in a remaining residual requirement of 256 homes.
9. RDC published an updated Housing Land Supply paper on 1<sup>st</sup> October 2018. This shows an additional 113 completions, resulting in a total of 1,437 having been built out. A total of 2,572 dwellings have planning permission or a resolution to grant. It should be noted that 24 of the additional dwellings with planning permission are on allocated site in the DaSA and therefore to avoid double counting should be taken from the 2,572 commitments total. On this basis, this leaves a residual requirement of 64 dwellings against the minimum Core Strategy target.
10. RDC does not justify the stated residual requirement in paragraph 8.6 of the DaSA, particularly when paragraph 8.7 identifies a higher residual requirement based on the Council's own evidence. This higher figure should therefore be utilised.
11. At paragraph 8.12, RDC goes on to state that the DaSA allocates sites for 1,562 homes, which excluding those which are double counted (amounting to 246 dwellings as set out at paragraph 8.13), amounts to a total of 1,381 new home allocations as specified at paragraph 8.13. This is not correct. RDC is only allocating sites for 1,316 new homes, not 1,381 as stated, when the 246 double counted units are subtracted from the total allocations. As a result, there is a shortfall of 129 homes against the minimum Core Strategy requirement i.e. the 64 residual requirement and 65 as identified above. This shortfall increases further to 399 dwellings, if the windfall and rural exception allowance is removed; after all, there is no guarantee that any such sites will come forward.
12. In order for the Plan to be positively prepared, consistent with national policy and to provide sufficient flexibility to ensure the minimum provision is met in order to account for non-delivery of sites or Neighbourhood Plans, the windfall allowance and rural exception sites should not be counted towards this minimum target, rather they should be factored into the housing target as a buffer, over and above the minimum requirements, to account for any shortfall.
13. In all cases, there is a disparity between the figures in the DaSA which RDC is relying upon to support its housing strategy. Ultimately, there is a shortfall of at least 129 homes against the minimum requirements, meaning that the DaSA will not meet the minimum housing needs of the

District. Given that the Core Strategy expressly states the 5,700 new homes is a minimum and that the NPPF requires LPAs to significantly boost housing supply, it is imperative that RDC allocates additional sites in the DaSA to ensure the Core Strategy target can be delivered.

14. Further in light of the Housing Delivery Test, evidence shows RDC has delivered only 69% of its required housing over the last 3 years. This is in addition to RDC's own statement contained in the December 2018 Housing Land Supply (at 1 October 2018) Update Note which identified previous under delivery. Given the foregoing RDC should allocate more sites to ensure that it can meet the full minimum Core Strategy housing requirement.
15. To help achieve this, RDC should support the allocation of the Land at Clavering Walk in the DaSA. Allocation of this site for 85 units would make a significant contribution to the residual requirement of 129 homes. Currently, the approach taken by RDC does not accord with the Government's objective of significantly boosting the supply of homes and does not go far enough to addressing housing needs. There is also no flexibility or contingency should there be any delay in delivery of current allocations or emerging Neighbourhood Plans, or non-delivery of existing commitments.
16. Bearing in mind the DaSA is intended to reflect the Core Strategy housing requirement of 335 dwellings per annum, and does not reflect the higher local housing needs figure identified for the area in the Government's Standard Methodology of 469 dwellings per annum, there is surely a fundamental need for RDC to act positively and allocate additional sites, including Land at Clavering Walk to help ensure a supply of specific and deliverables sites is maintained. This is ever more important given that the Standard Methodology figure will apply when the Core Strategy becomes five years old (September 2019) in accordance with NPPF paragraph 73. Any additional homes that may come forward through emerging Neighbourhood Plans or through windfall sites, would then provide some contingency in the event that housing delivery falls below RDC's expectations.
17. In addition, it is noted that the Housing Land Supply Position Statement as of October 2018 sets out the housing trajectory for the district over the remainder of the plan period. This trajectory shows a provision of just 2,084 dwellings over the next five years against a target of 2,692 (adjusted for previous under delivery and to include a 20% buffer in line with the Housing Delivery Test), with the majority of provision over the plan period weighted towards the last five years of the plan. Based on this trajectory, following the adoption of the DaSA, RDC will still not be able to demonstrate a five year supply of housing land, with projections as of October 2018 showing a supply of just 3.9 years. This is clearly not sound planning as it would not promote plan-led development within the district, would not be positively prepared, effective or consistent with national policy.
18. In summary, there is a residual requirement of at least 129 homes against the Core Strategy minimum requirement once an allowance has been made for dwellings already built, existing commitments, allocations and windfall sites. In order to ensure that the minimum housing needs of the District are met during the Plan period, particularly given the persistent under-delivery and that

upon adoption of the DaSA the Council will not have a 5 year housing land supply, it is imperative that RDC allocates additional sites. This approach would ensure that the DaSA is positively prepared, justified, effective and consistent with national policy.

19. Bellway Homes' site at Clavering Walk is a sustainable, edge of settlement site, adjoining the largest, most accessible town in the District, which itself is the focus for growth in the Core Strategy. The current planning application has shown that there are no unacceptable impacts arising from the development or technical constraints which would undermine the Plan or the NPPF objectives. The site is capable of delivering a high quality, sustainable residential scheme at an early stage of the plan period making a significant contribution to the Council's 5 year housing land supply, addressing housing needs and helping to provide sufficient safeguards and flexibility in the Development Plan.

***Are there sufficient safeguards and provision in place in the policy to ensure that the requirement would be met if the preparation of and making of neighbourhood plans is delayed or frustrated?***

20. RDC is overly reliant on the delivery of new homes from emerging Neighbourhood Plans which is considered to include insufficient flexibility or safeguards to ensure that housing targets will be met, particularly in the event that the Neighbourhood Plans do not allocate sufficient sites or indeed come forward.
21. In this regard, there is no guarantee that any of the identified emerging Neighbourhood Plans or Neighbourhood Plan Areas will progress quickly, or allocate sufficient sites to meet the minimum remaining housing requirement of the Core Strategy. Therefore, RDC should ensure that sufficient sites are allocated in the DaSA to meet the District's minimum housing needs, and with sufficient flexibility to allow for inevitable non-delivery or under-delivery of some allocations. The non-delivery of any Neighbourhood Plan should not prevent housing needs from being met in the wider District.
22. RDC's approach does support local decision making, by adjusting Core Strategy housing requirements in made Neighbourhood Plan Areas and retaining targets for those areas where Neighbourhood Plans may be emerging. However, even if the made Neighbourhood Plans delivered all of their housing allocations, there would remain a shortfall against the adopted minimum Core Strategy target. There is nothing in the NPPF or Planning Practice Guidance (PPG) that prevents additional sites being allocated in the wider District to ensure that housing requirements are met. There is also no reason why RDC cannot allocate additional sites to meet the minimum Core Strategy target, particularly when it is clear from the Government's Standard Methodology that local housing needs are much higher than currently being planned for. To ensure the Plan is flexible and includes sufficient safeguards to respond to rapid change, there is surely a need for RDC to allocate additional sites, including Land at Clavering Walk for 85 homes. This would make a significant contribution to helping to ensure, at the very least, that the minimum

housing requirement can be secured in the DaSA. Without this, it is questionable whether the plan is sufficiently flexible and therefore whether it meets the tests of soundness.

23. By allocating additional sites, RDC could demonstrate that the DaSA includes a strategy which positively seeks to address the minimum housing needs of the area as set out in the Core Strategy. It will also be effective in delivering new homes during the early stages of the Plan. Currently however, the DaSA cannot be considered effective or compliant with National Policy.