

Home Builders Federation

Matter 2

FOLKESTONE AND HYTHE LOCAL PLAN EXAMINATION

Matter 2 – The duty to co-operate

Issue

Whether the Council has complied with the duty to co-operate in the preparation of the Core Strategy Review.

Response to Questions 1, 2, 3, 4 and 5

In our initial representation we noted that the Council had not produced statements of common ground with all its neighbouring authorities. This situation has been addressed and the SOCGs submitted with the local plan. Whilst this shows that there has been engagement with the neighbouring authorities with regard to housing needs, we are concerned that this engagement has not reflected on the issue of unmet needs in any depth and as such question its effectiveness.

As we set out in our representations to the proposed amendments the statement of common ground agreed with Rother Borough Council (EB13.50) highlights in paragraph 2.10 the potential for that authority to require support from neighbouring authorities. As we mention in our representations Rother's local plan was adopted in September 2014 and as such those policies relating to housing delivery must be considered out of date as the plan is older than five years and has not been reviewed. In this situation paragraph 68-005 of PPG applies which states that in such circumstances:

“...the 5-year housing land supply will be measured against the area's local housing need calculated using the standard method.”

As such the annual housing requirement for Rother moving forward must be the local housing needs assessment as calculated using the standard method. As we will set out below the increased requirement in Rother will mean a shortfall in delivery that must be addressed.

Our statement sets out using the standard method would require Rother to deliver 6,210 dwellings per annum over their remaining plan period, some 1,500 homes more than identified supply. However, on revisiting our statement we recognise that this



calculation was incorrect. Using the standard method with a base period 2020 to 2030, will require Rother to deliver 728 homes per annum¹. Whilst we recognise the delivery of new homes in Rother is expected to increase from 2024/25, resulting in the delivery of an additional 4,384 homes between 2020 and the end of their plan period, there would still be a shortfall of 1,440 homes against their local housing needs assessment. In particular we are concerned that it is over the next 5 years in which this shortfall will arise. The housing requirement for Rother over the next 5 years using the standard method is 3,640 homes. However, between 2020 and 2025 Rother only expect to deliver 2,386 homes². This is a shortfall of 1,254 homes during this five-year period which as far as we are aware is not being addressed elsewhere in the region.

Whilst a new local plan for Rother could deliver an increase in housing to address unmet needs it is unlikely to do so in the next 5 years given the lack of urgency with which Rother is undertaking its planned review it is surprising that these existing unmet needs have not been considered.

Mark Behrendt MRTPI
Planning Manager – Local Plans SE and E

¹ Household growth from 2014 based household projection 2020 to 2030 is 526. 2019 median income to house price ratio is 10.17. Standard method: $(10.17-4)/4 \times 0.25 + 1 = 1.38 \times 526 = 728$.

² Rother DC Housing Land Supply Position Statement April 2019. www.rother.gov.uk/wp-content/uploads/2020/01/Housing_Land_Supply_as_at_1_April_2019_FINAL.pdf