

Sent by email to: [planning.policy@folkestone-hythe.gov.uk](mailto:planning.policy@folkestone-hythe.gov.uk)

20/01/2020

Dear Sir/ Madam

## **Response by the Home Builders Federation to the consultation on the amendments to the Core Strategy Review**

Thank you for consulting the Home Builders Federation (HBF) on the amendments to the Core Strategy Review. The HBF is the principal representative body of the housebuilding industry in England and Wales and our representations reflect the views of discussions with our membership of national and multinational corporations through to regional developers and small local housebuilders. Our members account for over 80% of all new housing built in England and Wales in any one year.

### **Housing needs**

We welcome the recognition that that the Council should have used the 2014 based household projections and the decision to increase the Council's housing requirement. However, we have concerns regarding:

- The reduced plan period; and
- Failure to include unmet needs of neighbouring areas within their assessment.

#### *Plan period*

We do not consider the Council's decision to reduce its plan period by a year to be justified. We recognise that the NPPF, and its associated guidance, states that Council's should calculate housing needs from the current year and would agree that in many cases this would logically lead to that year being the start date for the plan with the Council planning ahead for a minimum of 15 years from this point as required by paragraph 2a-012 of PPG. However, PPG does consider at paragraph 68-031 the issue of under delivery where a plan is being prepared part way through a plan period. This paragraph states that under delivery "*may need to be considered*" in such a circumstance. Given that the Council published its proposed submission with a plan period of 2018 to 2037 we would argue that the Council is part way through its proposed plan period. However, it has not considered the under delivery of some 300 homes in the first year of the plan period as set out in the Core Strategy Review consulted on at the beginning of 2019. The only consideration that appears to have been undertaken by the Council is how to minimise the impact of their failure to plan



for a sufficient number of homes between 2018 and 2037 in the first instance. We would therefore suggest that the Council maintains its 19-year plan period and ensure a land supply to deliver a minimum of 14,022 homes.

### *Unmet needs*

As set out in our representations we remain concerned that the Council are not proposing to address any of the unmet needs of neighbouring areas. The NPPF at paragraphs 11 and 60 state that LPAs should plan for the unmet needs of neighbouring areas. Rother have a local plan that will deliver a further 4,710 homes between 2019/20 and 2028/29. This is 1,500 homes short of the 6,210 homes required using the standard method which would currently apply given that Rother's local plan is out of date. We recognise that Rother are proposing to review their plan but they are already behind the ambitious timetable set out in their Local Development Scheme which states that they would be consulting on future development scenarios in December 2019. No such consultation has been published and we are concerned that any unmet needs during this period, and potentially beyond will be ignored not only by both Rother and Folkestone and Hythe but also other neighbouring areas. Rother have already identified in consultation it may need support in future and this should have been the catalyst to further joint working across neighbouring housing market areas to establish how needs can be met.

### **Housing Supply**

The Council have stated in the consultation document that they have sufficient capacity to meet the revised minimum housing needs. However, as we stated in our earlier representations, this does rely heavily on the new Garden Settlement commencing delivery by 2022/23 at a rate of 325 and sustaining delivery at or above this level for the remainder of the plan period. Whilst we are supportive of the allocation of land to deliver new settlements we are concerned where there is an over reliance on such settlements to meet needs. Such developments are often slow to start delivering new homes and this must be recognised with the Council's housing trajectory. We would suggest that the point at which this site starts delivering new homes is pushed back beyond the first five years and that additional smaller sites are allocated to ensure sufficient supply to meet minimum housing needs.

In addition, the development strategy being proposed provides only a minimal buffer between the housing requirement and planned supply of just 230 homes. Such a position takes no account of the fact that development is unlikely to be delivered as expected by the Council nor the requirement in paragraph 11 of the NPPF for Councils to prepare flexible plans that can take account of rapid changes in circumstance. If the plan is to achieve its housing requirement it stands to reason that additional sites are essential to enable the local plan's development requirements to be surpassed. For this reason, the HBF recommends that a 20% buffer in the Council's overall housing supply is necessary to ensure its housing requirement is met.

## Conclusions

In summary whilst we would not disagree with the Council's calculation of its local housing needs assessment this cannot be considered the housing requirement for the Borough given that there are unmet housing needs in a neighbouring area. Paragraph 60 of the NPPF is clear that these should form part of the Borough's housing requirement. In addition, we do not consider the reduced plan period to be consistent with national policy and there to be insufficient flexibility in housing supply to ensure housing needs for the plan period will be met. I trust that the Council will find these comments useful. I would be happy to discuss these issues in greater detail or assist in facilitating discussions with the wider house building industry. The HBF would like to be kept informed of the progress of the document. Please use the contact details provided below for future correspondence.

Yours faithfully



Mark Behrendt MRTPI  
Planning Manager – Local Plans  
Home Builders Federation  
Email: [mark.behrendt@hbf.co.uk](mailto:mark.behrendt@hbf.co.uk)  
Tel: 020 7960 1616  
Mob: 07867415547