

Matter 3: Housing

Prepared by

KEMBER LOUDON WILLIAMS



**On behalf of
Mr C Simmons (Respondent ID 194)**

**Examination of the
Hastings Borough Council Planning Strategy**

January 2013

Matter 3: Housing General Needs, Deliverability, Density and Quality

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This statement presents evidence on behalf of Mr Simmons in relation to the ‘general housing’ questions raised by the Inspector. It addresses each sub-question in turn and should be read in conjunction with our statement on Matter 7 ‘sites for housing’ because of the close inter-relationship between the proposed overall housing provision and the acknowledgement that Mr Simmons’ land represents the only legitimate strategic housing option within the Hastings Borough.

3.1 Which population and household forecasts does the Local Plan rely upon, how relevant are they and how does it take account of their implications in assessing housing requirements for the Borough?

3.1.1 The Council’s evidence¹ considers four distinct approaches to determining housing need:

1. *local need for housing;*
2. *trend based population projections;*
3. *housing market trends; and*
4. *housing needed to support economic growth.*

3.1.2 We consider that the ‘objectively assessed’ need is reflected by the trend based population project. This anticipates, based on best available data, the amount of new housing required to accommodate the population during the plan period. This assessment of need sits outside the scope of external influences and therefore most appropriately meets the test of being ‘objective’.

3.1.3 The local need assessment figures presented by the Council look at housing requirements without factoring in net in-migration. The Council does not evidence the basis for this.

3.1.4 It is unrealistic to expect there to be no in-migration during the period to 2028 in light of the historic trends in the area, therefore we do not consider that this assessment method meets the test of being ‘objective’.

¹ Assessment of Housing Need in the Hastings and Rother Housing Market Area May 2012.

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- 3.1.5 Turning to housing demand projection figures, these demonstrate that in the period between 1991-2011, 223 dwellings per annum have been delivered. In light of the Government's desire to see sustainable growth and an increase in house building, one would expect equal or greater provision to be accommodated within the next plan period, not less. On this basis alone, a housing yield of 3,791 units² should be derived if one was to use a housing demand method of assessment. However, notwithstanding that National Policy would not support a 6% reduction in housing provision, previous completion rates do not, in any way, reflect housing need, only recent housing demand.
- 3.1.6 In respect of housing needed to support economic growth, this is a relevant consideration in forming a planning strategy. However, it is not an objective or robust way of measuring housing need.
- 3.1.7 It is our conclusion, therefore, that the physical projection of how many houses will be required to home the projected population is the only realistic method of assessing objectively assessed need. On this basis, the strategy is not based on a proportionate evidence base and fails the test of being 'justified'. The strategy is therefore unsound.
- 3.1.8 Notwithstanding this, we consider that with appropriate modification the Strategy could be made sound. Please see part 3.3.

3.2 To what extent have landowners and developers been involved in the preparation of the Strategic Housing Land Availability Assessment (SHLAA) and the Strategic Housing Market Assessment (SHMA), and to what extent do these Assessments meet the requirements of the Framework paragraph 159?

- 3.2.1 The Council's SHLAA Report (2010) indicates that a number of stakeholders were contacted in respect of the detailed methodology. However, no additional information has been presented in evidence regarding the deliverability of sites, which is usually common practice ahead of an Examination process.

² 17 years at the historic 223 dwellings per annum rate i.e. to at least equal the completion rates delivered over the previous 20 years.

3.2.2 Most significantly, no evidence has been presented as to what basis the Council has for concluding that former unimplemented Local Plan allocation will continue to come forward. This matter should be given serious consideration in light of the reliance on these ‘old sites’ and the fact that they did not come to fruition during the buoyant housing periods of the mid 2000’s.

3.3 Can the proposed housing requirement of 3,400 dwellings during 2011-2028 be substantiated? Does it meet the full, objectively assessed needs for market and affordable housing in the Borough and as part of the housing market area, as the Framework requires? And which is that housing market area?

3.3.1 A requirement of 3,400 dwellings between 2011 and 2028 cannot be substantiated. The housing provision of 3,400 dwellings has been driven by the level of housing that the Council can deliver and is not underpinned by evidence, as required by the NPPF. The Hastings Planning Strategy is therefore inconsistent with National Policy and not legally compliant. The strategy is also ‘unsound’ as it is not justified and underpinned by a proportionate evidence base.

3.3.2 The NPPF is clear in respect of the way in which Local Authorities should plan for new housing. Paragraph 14 places a presumption in favour of sustainable development at the heart of plan-making, giving clear guidance that Local Authorities should seek positive opportunities to meet the needs of the area and to meet the objectively assessed housing need. The robust method when determining a localised housing target is to identify need in the first instance, and then assess what level of this need can be met without adverse impact and with strategic flexibility.

3.3.3 In contrast, it would appear that the Council’s provision has been derived through the reverse procedure, with a predicted achievable level of housing underpinning the target.

3.3.4 We consider that this is in conflict with the NPPF and that an amendment to the plan is required to make the strategy legally compliant and sound. This would require:

1) An acknowledgement that the objectively assessed housing need for the Borough is approximately 7,493 new dwellings; but with a conclusion that this figure could not be met without adverse impact; and

2) An objective re-assessment of the level of housing need that can reasonably be accommodated, without adverse impact, but whilst still ensuring flexibility to adapt to rapid change³.

3.3.5 Through undertaking this exercise we consider that land at Breadsell Lane can accommodate an additional 450 units above the supply identified by the Council, without environmental harm. These extra units would contribute to the identified high level of housing need.

3.3.6 We therefore conclude that a strategic allocation should be included, subject to an appropriately worded release mechanism that restricts the release of the site to after the first five years of the plan period. See Matter 7 Statement for further detail.

3.4 Can the annual provision of 200 dwellings, rather than the RS annual requirement of 210 dwellings be justified? Why is it that the trajectory at page 120 shows completions substantially above the annual requirement during 2014 - 2020 but generally below it for the latter part of the plan period. How robust is the evidence for this trajectory?

3.4.1 The Council does not provide evidence as to why 200 units pa would be more consistent with a regeneration led strategy than the provision of the South East Plan target, or, more importantly, why the reduced target benefits regeneration to an extent that warrants an increased deficit against housing need. The South East Plan target was established within the context of the role Hastings plays in the Sussex Coast sub region, which was deemed to be a priority area of economic weakness. As the South East Plan was underpinned by robust evidence, this should have been the starting point for the Council when the Government announced its intention to revoke the Plan.

³ As required by paragraph 14 of the NPPF.

3.4.2 The decision to depart and reduce the figure is not underpinned by evidence and as such the plan is unsound. In this respect, the comments of the Inspector examining the Rother Local Planning Strategy, which relies upon a shared housing evidence base with Hastings Borough, is also relevant as the Inspector has concluded that the only legitimate and robust housing target is that define through the South East Plan. The Rother Inspector’s letter is included for information at **Appendix 1**.

3.4.3 Taking these issues into consideration. An amendment to the plan to reinstate the 210 dpa South East Plan requirement would make the plan sound. The resulting deficit in supply, along with that arising from other unjustified components such as the re-use of existing housing stock, could be filled through the strategic allocation of land at Breadsell Lane.

3.5 Does the Local Plan identify, and provide a mechanism for, an annual updating of a supply of specific deliverable sites sufficient to provide 5 years worth of housing against housing requirements with an additional buffer of 5% (moved forward from later in the plan period) to ensure choice and competition in the housing market?

3.5.1 Policy DS1 states that the Annual Monitoring Report (AMR) and updates of the SHLAA are the Council’s mechanisms for updating a deliverable supply of sites. We would be concerned in respect of these elements as a monitoring tool. The Council’s AMR is published some 9 months after its base date, which does not allow for an immediate or flexible response to a deficit in housing supply. Further to this, a SHLAA prepared in accordance with Government guidance⁴ should demonstrate all land that is available and being promoted for housing and not conclude what sites are suitable. An annual housing supply update statement would therefore be a more robust tool.

3.5.2 The implementation strategy identified in policy DS1 is insufficient to increase supply in the event of a shortfall of housing land. The plan identifies that the Council will work with landowners, promote sites, explore compulsory purchase powers and consider utilising Council land. All of the above methods are long term measures, none of which

⁴ Strategic Housing Land Availability Assessments Practice Guidance, CLG, July 2007

are likely to provide an immediate response to a housing supply deficit. For this reason the plan is not flexible and therefore not effective, thus failing the test of soundness.

3.5.3 The plan can be made sound by the inclusion of Mr Simmons' land at Breadsell Lane, which would also act as a form of strategic reserve land. As detailed within our Matter 7 statement, we suggest a strategic Greenfield allocation that restricts development to the middle or latter stages of the plan period, unless it is demonstrated that there is an inadequate 5-year housing land supply position that requires its early release. This release should be monitored by a housing supply update statement.

3.6 What has been the record of housing delivery against the requirements of various plans? Has any under-delivery of housing been so persistent that it calls for an increase in that buffer to 20% (moved forward from later in the plan period) to provide a realistic prospect of achieving the planned supply and to ensure choice and competition in the market for land?

3.6.1 Within policy DS1 the Council acknowledges itself to be an Authority that requires a 20% buffer in accordance with the requirements of the NPPF. We support this assessment.

3.7 Does the Local Plan identify a supply of specific, developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-17?

3.7.1 The Council has produced through its SHLAA and AMR a list of sites that it deems to be deliverable⁵ and developable⁶ over the earlier and later stages of the plan period. However, we do not consider that this list constitutes adequate evidence that the sites will come forward.

3.7.2 In our experience of other recent Core Strategy (Local Plan) Examinations, greater evidence is usually provided in respect of letters or proformas from land owners confirming that sites have a reasonable prospect of coming forward, and more importantly, that the promoter acknowledges that the development of the site would

⁵ As defined by footnote 11 to paragraph 47 of the NPPF

⁶ As defined by footnote 12 to paragraph 47 of the NPPF

be viable in light of the wider proposals of the Examination Strategy. We have not seen evidence of deliverability to support a case that all of the sites will be delivered.

3.7.3 Attached to this statement at **Appendix 2** is an example of work undertaken by Sevenoaks District Council in order to support its housing land supply position at Examination, including a copy of the obligatory proforma required for completion by each land promoter. We consider that this level of evidence is required for Hastings, especially in light of the reliance of unimplemented former Local Plan allocations and outstanding planning permissions.

3.8 Does the identification and delivery of land for housing rely too much upon the adoption of the Development Management Plan and what is the proposed timing of this DPD? If necessary, should the Local Plan identify key sites considered critical to the delivery of the housing strategy during the plan period, e.g strategic site allocations, broad locations or any other greenfield releases?

3.8.1 We consider that there is high degree of uncertainty regarding the components of the Council's housing land supply and question whether it can be delivered.

3.8.2 The NPPF⁷ requires Council's Local Plan to be able to flexibly adapt to rapid change. However, a reliance on historic sites that have not been developed during good economic times does not lend itself to a flexible strategy, rendering the Local Plan ineffective and unsound.

3.8.3 The inclusion of strategic land at Breadsell Lane would remedy these concerns and make the strategy effective. We envisage that the site would be subject to its own policy that restricts development to the middle or latter part of the plan period, but that could also play a reserve role that would allow the site to be bought forward earlier in the plan period if a lack of housing land supply necessitates.

3.8.4 The suggested tool would be of benefit to the Council's strategy and would remove any ambiguity in respect of its ability to meet the housing provision.

⁷ paragraph 14

3.9 What importance does the Council, through its Local Plan, attach to the re-use of previously-developed (brownfield) land (pdl)? Is it sufficiently clear that any such redevelopment should be on “well-located” pdl? Should there be a “local brownfield target” and, if defined, is it likely to be achievable and what evidence is available at present to justify it? Is contamination likely to be a major constraint in bringing forward pdl?

3.9.1 The strategic allocation of land at Breadsell Lane would not undermine the objective of prioritizing pdl, but would provide strategic flexibility to overcome housing supply issues in the event that pdl sites do not prove viable or become available as the Council envisages.

3.10 What has been the record during the previous 10 or so years in achieving housing development on pdl? Does the Local Plan give sufficient attention to the contribution which “windfalls” might make throughout the plan period to housing requirements? How much scope is there for more housing in the town centres?

3.10.1 We consider that there is insufficient information to justify the existing windfall rate in light of the recently revised definition of pdl. As development on garden land no longer constitutes a ‘windfall’ development, the Council should present before the Examination an assessment of historic windfall rates, on non garden developments only, so that it may be fully assessed how this change has impacted upon the predicted number of units per annum. Only then can this source be relied upon.

3.11 Does the Local Plan clearly and consistently set out what amount of development, in terms of number of units and definition of sites, will take place in the locations identified? And is the precision of the stated figures supported by the evidence base? For example, what are the components of the 3,400 proposed dwellings during 2011-2028? Presumably some are already built.

3.11.1 We consider that neither the plan nor the evidence base clearly sets out the detailed components of the housing supply or the overall distribution of development between the various character areas. Each component of the land supply should be underpinned by a list of sites/permissions so that they can be thoroughly assessed for robustness⁸.

⁸ See example of work undertaken by Sevenoaks District Council. Appendix 2 to this statement.

3.11.2 The evidence does not document the split between outstanding permissions and those currently under construction, thereby making it impossible to accurately assess the robustness of the components that contribute to the bottom line supply figure.

3.12 Does the Council's evidence base identify a sufficient level of housing supply to meet and exceed expected requirements? For example, is it clear from the evidence how the housing land supply figures have been broken down into relevant components, and is this evidence base sufficiently up to date with particular regard to:

- 1) Completions**
- 2) Commitments - extant planning permissions**
- 3) existing development plan allocations that have not yet been implemented and remain available (excluding those with extant permissions)**
- 4) housing supply anticipated to come from sites to be allocated in future DPDs (excluding those with extant permissions)**

3.12.1 The Council's housing supply evidence should be broken into more detailed elements in order to assess how robust the supply is.

3.12.2 A list of existing completions should be provided to demonstrate that this is a net gain and that it takes into account units of accommodation lost.

3.12.3 Existing planning permissions should also be split between those under construction, which have more certainty regarding delivery, and those that are yet to be implemented. For sites yet to be implement, additional information should be supplied to detail the age of the consent (i.e. is it a site with a long history of subsequent renewals of planning permission that may not necessarily be relied upon) and evidence obtained from landowners to demonstrate there is a reasonable prospect of the site being implemented. It should also be made clear what non-implementation rate has been applied to allow for the consents that will expire.

3.12.4 As previously stated, there is a lack of evidence to support the re-inclusion of previous Local Plan allocations that have not been implemented. Those that have not come forward since 2004 should be rigorously assessed and evidence should be provided in respect of how these sites remain viable and why they can be relied upon as part of the

supply. Until such work has been carried out this aspect of the evidence base cannot be considered credible.

3.12.5 It is understood that the Council will consult on a Site Allocations DPD prior to the commencement of the hearing sessions. However, until such time as this document is published it is not possible to determine the validity of the sites proposed.

3.12.6 Taking into consideration, we therefore have significant concerns regarding the robustness of the Council's housing supply. As such, we consider there to be conflict with paragraph 159 of the NPPF, resulting in an unjustifiable plan that fails the test of soundness.

3.12.7 Notwithstanding the above, we consider that the inclusion of a strategic allocation of Breadsell Lane would provide greater certainty regarding the Council's ability to meet its provision, which would overcome these concerns and provide greater certainty that the plan is effective.

3.13 Does the Local Plan adequately promote a wide choice of high quality homes, promote wider opportunities for home ownership and provide for the creation of sustainable, inclusive and mixed communities?

3.13.1 Policy H2 promotes a mix of housing types, whilst H3 sets the Council's affordable housing requirements. In this respect, it must be noted that a large Greenfield development, as proposed by Mr Simmons, would yield a much greater level of affordable units than the opportunities arising from smaller scale previously developed sites.

3.13.2 Based on an approximate capacity of 450 new dwellings at Mr Simmons' land, and the 40% provision requirement contained in policy H3, 180 affordable housing units could be created. Whilst this would only go a short way in meeting the need of the 2,392 people currently on the housing register⁹ it would be a more significant level of contribution that will be created from smaller scale pdl allocations and windfall sites.

⁹ Para 18 of the Explanation of Housing Evidence August 2012

The site's development also provides further opportunity for additional development to the south.

3.14 Does the Local Plan adequately support a suitable mix of housing sizes and types? Does it adequately identify the size, type, tenure and range of housing that is required in particular locations, reflecting local demand, or will the Development Management Plan address that requirement? In particular, however:

a) Should explicit provision be made for larger houses to meet the particular needs of the Borough's ambitions and its various population groups, in anticipation of economic growth and/or for any other reason?

b) Does the Local Plan make adequate provision for family housing? In any event, is the market working in these directions?

c) Should there be any provision for car-free housing schemes?

3.14.1 The allocation of land at Breadsell Lane is the only strategic opportunity to prepare a masterplan for housing that meets the Council's preferred mix and tenure of dwellings.

3.15 What policies, proposals and resources does the Council have, and to what extent have they achieved success, in bringing back vacant dwellings into residential use? Can any such re-use after a given period of vacancy really count towards the housing requirements and, if so, what is the extent of any such contribution?

3.15.1 Whilst we applaud the Council's desire to bring empty housing back into occupation, the inclusion of this component within the housing supply is unsound and represents 'double counting' of units previously completed.

3.15.2 Most Local Authorities have a housing strategy that seeks to bring empty homes back into use. However, we are unaware of any that have legitimately argued that these form part of its housing supply within a sound Core Strategy/Local Plan.

3.15.3 The NPPF¹⁰ states that Local Planning Authorities should have a clear understanding of housing needs and therefore that they should prepare a SHLAA to establish realistic assumptions about the land available over the plan period. The Government's SHLAA

¹⁰ Paragraph 159.

guidance¹¹ unambiguously states what site sources should have potential for housing, which does not include the re-use of existing stock.

3.15.4 The inclusion of 255 new units should be removed from the Council's housing land supply. This results in a deficit of housing land that renders the plan ineffective and unsound. This can be remedied, and the housing supply gap filled, through the strategic allocation of land at Breadsell Lane, which is an accepted source of land and that will provide greater certainty over the Council's ability to meet its housing target.

3.16 Should there be a policy to resist inappropriate development in residential gardens where that would cause harm to the character and appearance of the area (Framework paragraph 53)?

3.16.1 No comments to make in respect of this issue. However the Council should fully justify its windfall allowance in light of the reclassification of garden land. Evidence should be presented to support 40 new units per annum, without using garden land.

3.17 What measures are being introduced, and how are they being funded, to improve the energy efficiency of the existing housing stock and thereby reduce fuel poverty? Should the Local Plan include any further relevant reference to this matter?

3.17.1 The large scale redevelopment of Breadsell Lane will provide opportunities for greater levels of renewable energy measures than the development of smaller scale sites restricted by their confined nature and viability issues.

¹¹ CLG Strategic Housing Land Availability Assessments Practice Guidance July 2007, paragraph 20 and Figure 4.

Appendix 1

Inspector's letter dated 13th December 2012 in respect of the Rother Local Plan Strategy



ROTHER DISTRICT COUNCIL
LOCAL PLAN (2011-2028) STRATEGY EXAMINATION

Inspector: Laura Graham BSC MA MRTPI
Programme Officer: Lynette Benton
Lynette.Benton@rother.gov.uk : 07889 724193

13th December 2012

Dear Mr Marlow

Rother Local Plan Strategy (LPS)

Following the conclusion of the hearings on 22 November 2012, I have reviewed all the evidence, the written statements and the discussion at the hearings. The Council has indicated that, under section 20(7C) of the Act, it wishes me recommend any modifications necessary to ensure that the Plan can be found sound. At the close of the hearings I indicated that I would advise you, before 13 December of any serious soundness concerns. For the avoidance of doubt, these should be regarded as my preliminary conclusions. I have concentrated on my concerns relating to housing provision as this is a fundamental aspect of the LPS which may have wider ramifications.

There was considerable discussion at the hearings regarding housing provision. As you know, until the Regional Strategy (SEP) is abolished there is a legal requirement for the Plan to be in general conformity with it. The SEP includes a net housing requirement for the provision of 5,600 dwellings in Rother District between 2006 and 2026. The LPS includes a housing target for the period 2011 -2028, expressed as a range of 3,700 - 4,100 dwellings. A straightforward comparison of the annualised dwelling requirement is that the SEP seeks the provision of 280 dwellings per annum (dpa), whereas the LPS requirement is 218 -241 dpa, which equates to 78% - 86% of the of the SE Plan annual requirement.

However, the difference in the Plan period means that a more complex calculation is required to provide a more meaningful comparison between the two figures. It is my view that this calculation should be carried out as follows: Firstly, the SEP target needs to be extended to 2028 by rolling forward the annualised requirement: $5,600 + (280 \times 2) = 6,160$ for the period 2006 - 2028. Secondly, housing completions between 2006 -2011 can be deducted to provide a residual requirement from 2011 -2028: $6,160 - 1,357 = 4803$. This equates to an annualised requirement of 283 dpa. The LPS is, therefore, seeking to provide between 77% and 85% of the SEP requirement.

I have carefully considered the Council's reasons for including a reduced target, compared to the SEP, in the LPS. A key factor relied upon by the Council is the delay to the provision of the Bexhill to Hastings Link Road (BHLR), compared to the expected timescale at the time the SEP was prepared (completion in 2010). At the time of writing this letter, there would appear to be a reasonable prospect that the BHLR will be built in accordance with the current timetable, i.e. to open in late 2014. At the hearings the Council confirmed its expectation that the north east Bexhill strategic allocation will be built out within the plan period. This leads me to the conclusion that, whilst delay in the building of the BHLR may affect the trajectory for housing provision, it is not a convincing reason to reduce the SEP target for the Plan period as a whole. The Council also refers to "other major road/rail improvements identified in the SEP" that are not progressing as planned. A number of road and rail schemes are referred to in paragraphs 9.15 - 9.18 of the Housing Provision in Rother District Background Paper, but paragraph 9.19 concludes that, aside from the BHLR, there are no other "showstoppers" in terms of infrastructure constraints.

Lynette Benton, Programme Officer, Rother District Council,
Town Hall, London Road, Bexhill-on-Sea, East Sussex TN39 3JX

ROTHER DISTRICT COUNCIL
LOCAL PLAN (2011-2028) STRATEGY EXAMINATION

Inspector: Laura Graham BSC MA MRTPI
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You also refer to the economic downturn as a factor justifying the lower housing target in the LSP. Although the economic recovery may be taking longer than originally hoped, it is still a reasonable assumption that the economy will return to more normal levels of growth over the 17 year plan period. Accordingly, this is another factor which may affect the trajectory for delivery of housing and jobs, but is not a credible reason for reducing the overall target. If there is a justified concern that unconstrained housing provision would exacerbate the existing imbalance between housing and employment provision, this could be a reason for seeking to phase new housing development across the Plan period. However, such an approach would require careful justification.

As a third factor to justify the reduction from the SEP housing target, you make reference to the settlement studies for Bexhill, Battle, Rye and the Rural Areas in addition to the results of consultation on the various iterations of the Plan. Leaving aside the BHLR implications which I deal with above, the main implications of these studies appear to be the removal of sites in the Hastings Fringe areas and the loss of one previously allocated site in Rye and doubts about delivery of some other sites. However, the loss of previously-allocated sites does not necessarily imply that the overall housing target should be reduced. In the first instance, I would expect the Council to consider whether there are other sites which could be brought forward to meet the SEP target.

I note your comments regarding the contribution that rural exception sites and small site windfalls may make to the delivery of new housing. However, new dwellings provided through such means would generally be included in annual figures of housing completions, thereby reducing any residual requirement. It is therefore unlikely that these sources of new dwellings would lead to an increase in the overall number of dwellings provided. I accept that there is a degree of flexibility implied by the requirement for general conformity and that that the policies of the SEP, as a whole, must be taken into account. However my initial conclusion is that the significant shortfall in housing provision, compared to the SEP target, means that the LPS is not in general conformity with the SEP.

Furthermore, I am not convinced that the Sustainability Appraisal fully supports the assertion at paragraph 7.22 of the Plan that the SEP requirement is no longer sustainable. To my mind, the conclusions of the SA that Option B1, which reflects the SEP requirements, is "less sustainable" than option B2, which more closely reflects the lower levels of provision proposed in the Plan, falls well short of the Framework expectation that local planning authorities should meet objectively assessed needs unless any adverse impacts would *significantly and demonstrably* outweigh the benefits (my emphasis). In this regard I note, in particular, that the levels of growth proposed in the SEP took account of the AONB designation covering much of the District. In addition the Strategic Housing Land Availability Assessment suggests that there may be greater potential to accommodate housing within the District than is implied by the current targets although I accept that the cumulative impact of development both within and outside the AONB may require further investigation.

Compliance with the National Planning Policy Framework (the Framework)

The Framework (paragraph 47) requires local planning authorities to boost significantly the supply of housing by using their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area, as far as is

ROTHER DISTRICT COUNCIL
LOCAL PLAN (2011-2028) STRATEGY EXAMINATION

Inspector: Laura Graham BSC MA MRTPI
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consistent with the policies set out in the Framework. At the hearings you advised that the Council considers that the figure of 350 - 500 dwellings per year for the Hastings/Rother Housing Market Area (HMA), set out at paragraph 70 of the Assessment of Housing Need in the Hastings and Rother Housing Market Area, May 2012, to correspond with the full, objectively assessed need required by the Framework. As the Assessment notes, different approaches to defining housing need give rise to markedly different assessments of annual housing requirements. However, I can find no evidential support for the choice of the initial range of 250-500 dwellings per year (paragraph 66), which is subsequently adjusted to 350 - 500 dwellings per year to assist in providing more affordable housing.

The impression given in the evidence before me is that the figure of 350-500 dwellings is a range which reflects the Councils' views of what they consider to be an appropriate level of housing growth, bearing in mind the various environmental and other policy constraints identified. I do not consider that this corresponds with the concept of the full, objectively assessed need referred to in the Framework. The Framework requires the level of need to be identified and places a duty on local authorities to meet that need, so far as that is consistent with other policies in the Framework. Paragraph 179 of the Framework refers to the need for local planning authorities to work together to meet development requirements which cannot wholly be met within their own areas. There is no suggestion within the Framework that the level of 'need' should be reduced having regard to identified constraints or policy aspirations, which appears to be the methodology underpinning the 'Assessment of Housing Need' May 2012.

In the circumstances, the only robust figure available at this time is the SEP requirement. I am therefore inviting the Council to reconsider the strategy for housing provision in the LPS. One possible approach would be to revert to the SEP figures, as included in earlier versions of the Plan, and include a commitment to an early review of the Plan to ensure full compliance with the Framework.

I look forward to receiving your response by 18th January 2013. If you are unable to respond by this date please advise the Programme Officer.

Laura Graham
Inspector

Appendix 2

Example of robust housing evidence statement prepared in advance of Sevenoaks District Core Strategy Examination.

Note the detailed publication of information to underpin the housing supply and assumptions and the level of information contained within the proforma completed by each landowner promoting significant sites.



**Housing Supply Update
August 2010**

Housing Land Supply Note
August 2010

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EXECUTIVE SUMMARY

The Core Strategy identifies a housing supply of 3,561 dwellings over the period 2006 to 2026 to meet the overall provision figure based on the former South East Plan of 3,300 dwellings. This is based on the identified supply in the Strategic Housing Land Availability Assessment (2009 update) and is made up as follows:

Core Strategy Housing Land Supply Summary

Components	No. Units
Completions (since 2006)	692
Outstanding Permissions (1)	1,366
Potential Allocations (2)	978
Small Site Allowance (after first ten years only) (3)	525
Total	3,561

Source: SDC Core Strategy Paragraph 4.1.9

Notes:

(1) After a deduction has been made to allow for a non implementation rate based on past trends. Outline planning permissions (totalling 531 units) are included in this total following assessment in the SHLAA.

(2) Based on sites assessed in the SHLAA

(3) 75 dwellings per annum based on past trends. Small sites are less than 0.2 ha

Some representations question whether the identified supply is sufficient and suggest it should be discounted by varying amounts to allow for risk of non-delivery.

To confirm the deliverability of the identified supply the Council has contacted the developers and prospective developers of sites with planning permission and potential allocations from the SHLAA to establish their continued intention to develop. It has also updated progress in the implementation of development sites to show how delivery is progressing.

Sites with Planning Permission

The majority of sites with planning permission were already under construction at the 1 April 2009 base date (529 units out of 877). Of those that had not started a further 96 are now under construction or complete. Developers for the great majority of the rest (199 units) have confirmed their intention to proceed. Of the remaining 53 units, 29 are subject to a degree of uncertainty because of lack of response and 24 are unlikely to proceed. Of these 24, 11 have expired, 9 are on schemes that have been abandoned and a further 4 units have been lost due to revised applications with reduced numbers. This suggests that a discount of between 24 and 53 units could justifiably be applied to the planning permissions figure to obtain a total for the number of units that can reasonably be expected to be developed.

The SHLAA applies a discount based on past rates of non delivery which reduces the outstanding permissions total by 42 units from 877 to 835 units. The results of the update suggest this is a realistic and justified level of discount.

Applying a 10 or 20% discount as some respondents have suggested would involve disregarding schemes where there is a confirmed intention to proceed.

Sites with Outline Planning Permission

The great majority of this total (500 out of 531) consists of the West Kent Cold Store site where work has now started. The update has revealed additional permissions for 10 units at the base date on small sites which were omitted in error from the list of outstanding permissions at the base date. There is a confirmed intention to proceed on all the permitted schemes bar two units on schemes that are now unlikely to proceed. Outline planning permissions at the base date can now be expected to deliver 539 units, a slight increase on the published figure.

Potential Allocations Based on SHLAA Sites

The Draft for Submission shows a total of 978 units. The update shows an intention to proceed on all sites but there are a few potential changes to the yield from individual sites which could result in the reduction of proposed allocations by up to 42 units. In a worst case scenario and all these units were lost, this would reduce the total down to 936 dwellings.

There are also representations from two prominent land owners in support of significantly increasing the number of dwellings proposed for both the sites at United House, Swanley and the Sevenoaks Waterworks totalling 215 units. Though the Council is not convinced that the scale of increased proposed for the United House site can be fully achieved, there is a general acknowledgement that an increase in capacity should be explored and some net increase in the number of dwellings from these sites is likely to be considered appropriate.

Conclusion

The updated information on progress in delivering identified sites shows that there are changes with regard to likely development on some sites but not sufficient to significantly change the overall figures.

The information that has been collected provides increased certainty over delivery of the identified supply due to confirmed developer intentions to proceed and evidence of progression measured by the granting of permissions and the commencement of development on a number of sites.

1 INTRODUCTION

- 1.1 The distribution of development and housing land supply contained within the Core Strategy Draft for Submission was informed by the Council's Strategic Housing Land Availability Assessment (SHLAA), carried out in June 2008, and by the subsequent SHLAA Update report completed in September 2009.
- 1.2 The above documents demonstrated that the District has a housing supply of 3,561 dwellings against a proposed Core Strategy requirement for 3,300 new homes.
- 1.3 Whilst the Council considers its housing evidence base is robust, some parties have challenged the supply figures published in the submitted Core Strategy and suggested substantial discounts should be applied, which if accepted, might create a requirement to identify additional land for housing.
- 1.4 The purpose of this document is to demonstrate that the housing supply evidence is robustness and provide further evidence that assumptions that have been made by the Council are justified.
- 1.5 The document reviews the contribution of outstanding permissions and proposed allocations to ascertain what progress or problems have occurred since the Core Strategy base date. The document is not a full update of the housing land supply, nor is there an update of the base date to 2010. As such sites under construction at 1 April 2009 and now complete have not been calculated, nor have new permissions that have been received post base date.
- 1.6 In order to ensure a detailed picture of the housing supply, detail of the existing completions, previously published in the SHLAA Update Report 2009, are provided within Chapter 2.
- 1.7 Outstanding permissions represent a large proportion of the District's total housing land supply and are therefore especially sensitive to challenges. Chapter 3 of this document assesses these outstanding permissions and establishes the levels that have been implemented, those that are under construction, those that are yet to be started and those that have expired since the assessment that were carried out.
- 1.8 Chapter 4 explores the contribution of Outline planning permissions to the overall housing supply.

- 1.9 Chapter 5 reviews the sites previously identified through the SHLAA as having potential to be allocated for housing, and updates the position following representations from the recent Allocations (Options) DPD consultation and any other new considerations.

- 1.10 Chapter 6 makes reference to the Council's approach to a small scale windfall allowance after the first ten years of the plan period.

- 1.11 Chapter 7 summarises the overall housing supply, whilst Chapter 8 draws overall conclusions with regards to robustness of the published Core Strategy housing land supply.

2 HOUSING COMPLETIONS

- 2.1 As detailed in the SHLAA the Core Strategy will cover the period from 2006 to 2026 and completions since 2006 therefore form part of the supply.
- 2.2 The completion figures have not been updated for this note but are reproduced below for the sake of completeness. Over the three year period from 1 April 2006 to 31 March 2009 there has been a net total completion of 692 dwellings with the District, averaging 230 units per annum. This is significantly above the 165 annual requirement previously set out in the South East Plan.

Table 1: Completions within Core Strategy period (2006 -2009)

Core Strategy Period	Total
Completions 06-07	141
Completions 07-08	261
Completions 08-09	290
TOTAL	692

Source: SDC

3 OUTSTANDING PLANNING PERMISSIONS

- 3.1 This section seeks to review the assumptions made in the Core Strategy with regards to the contribution of outstanding planning permissions.
- 3.2 As at 1 April 2009 (the SHLAA and Core Strategy base date) there was a total contribution of **877 units** in the housing land supply that came from sites with detailed planning permission.
- 3.3 For the purpose of this note, detailed planning permission includes sites granted Full planning permission, Outline consents that had subsequently achieved Reserved Matters approval and one site that had a resolution to approve Full consent subject to a Section 106 agreement.
- 3.4 Within the SHLAA, to allow for the likely level of non-implementation due to expired permissions, the figures for both sites of over and under 0.2ha with detailed permission were reduced by 4% and 6% respectively, in order to provide a robust calculation of the contribution of committed full planning permissions to total housing supply. The total figure for outstanding permissions included within the SHLAA was therefore reduced by 42 units from 877 to 835 units.
- 3.5 More specific detail on the methodology adopted is included with the SHLAA Update Report 2009.
- 3.6 Following representations to the Core Strategy there have been a number of objections and representations that suggest higher levels of discount should be applied for non implementation than what the SHLAA allowed. This document seeks to provide a more detailed assessment of the outstanding permissions in order to justify that the non implementation methodology remains robust.

Methodology

- 3.7 The first stage was to separate the unimplemented outstanding permissions into those under construction, those where works have not yet started and those where consents have subsequently expired since the original SHLAA assessment.
- 3.8 Sites now under construction have been implemented and cannot expire, so it is not appropriate to apply a non implementation rate for expiry into this category. Where a

site is not under construction it was necessary to determine whether there is a continued intention by the owner/developer to implement the consent.

- 3.9 To provide more certainty with regards to the likelihood of existing consents being delivered, the applicants of all sites with permissions that had not yet started were written to and asked as to whether there is a continued intention to develop, and if so the broad timescale for works to commence (see **Appendix 4**). The second stage was to ascertain whether there has been any new application or permission to extend the time limit or for an alternative development.
- 3.10 The Council received a good response rate to the mail out, obtaining specific detail on the deliverability and broad timescales for many of the outstanding consents. Where an owner or agent stated that there is a continued intention to develop, this is considered to be sufficient to demonstrate that there is a genuine prospect of the site continuing to contribute to the overall housing supply.
- 3.11 For a few sites where a revised or time extension application was either pending or approved verbal confirmation only was provided of the intention to proceed. Together with the new application this was considered to show that the scheme has not been abandoned and that there is a reasonable prospect that the site will still be delivered.
- 3.12 Where evidence suggested that an alternative scheme has been approved the potential yield from the site has been adjusted to reflect the most recent scheme, which is considered most likely to be delivered.
- 3.13 Where the intention to develop was unclear from our records or where no response was received the intentions have been classified as unknown and should be the sites where a potential non implementation rate is appropriate, due to the uncertainty of delivery.
- 3.14 Sites were only deleted from the housing land supply if it was established that the scheme had been abandoned. Schemes were not deleted simply because development is delayed for reasons such as the recession. The test being whether the Council can reasonably expect the scheme to be implemented during the plan period.
- 3.15 It should be noted that as part of this process, sites with no net increase or decrease (i.e. replacement dwellings) have not been included as they do not impact upon the overall housing land supply.

Committed Sites - Under Construction as at 1 April 2009

- 3.16 Planning application approvals for all types of development are subject to a condition that states when the permission will expire if work does not commence. However once sufficient works have started to implement the permission, it can no longer expire.
- 3.17 At the Core Strategy base date there was a total of 529 units where the consent had been implemented. As such it is not considered appropriate that these should be subject to a discount rate for non implementation as they cannot expire and many are nearing completion.
- 3.18 As expected in the current economic climate, work on some of these sites has been delayed. A delay in works does not mean that a scheme is abandoned and it is reasonable to expect that sites that are under construction will be completed during the course of the Core Strategy period to 2026.
- 3.19 **Appendix 1** of this note sets out the sites and planning permissions that contribute to the implemented 529 units.
- 3.20 Where sites have been subject to new applications for alterations to schemes already under construction this is detailed within the appendix, albeit in this instance these sites do not impact upon the overall figure of 529 units.

Committed Sites –Sites not started as at 1 April 2009

- 3.21 The remaining balance of the outstanding planning permissions are sites where as of the base date work had not started. These total 348 dwellings.
- 3.22 As works have not begun at these sites the planning permission alone provides less certainty regarding whether these will ultimately be delivered and contribute to the Council's housing supply.
- 3.23 Further work has been carried out to assess the progress of these sites as at April 2010. **Appendix 2** shows a full breakdown of each of these sites and categorises development into the following groups;
- *Sites previously not started but now complete;*
 - *Sites previously not started but now under construction (these sites are implemented and as such cannot expire);*
 - *Sites that have still not started but have an identified continued intention to develop;*

- *Sites that have not started – with unknown information regarding whether the consent will be implemented.*
- *Sites not started where the scheme has been abandoned and where there is no longer any intention to develop; and*
- *Expired sites - where the consent has expired and sites should be deleted from the "Outstanding Commitments" section of the housing land supply.*

3.24 It should be noted that the review process has identified revised schemes, some of which are for an amended quantum of development, resulting in a net loss of four units

Update Findings

Sites Under Construction/Completions

3.25 Of the 348 dwellings previously identified 81 units come from sites that are now under construction, where previously works had not started at the base date.

3.26 In addition 15 units that had not started at the base date are now complete.

Sites not yet Started

3.27 A yield of 228 dwellings units are from sites that have still not started. As such these sites still have a potential element of uncertainty as to whether they will ultimately be delivered and contribute to the District's housing supply.

3.28 However 52 of these sites (accounting for 199 units) have confirmed an intention to proceed accompanied either by amended schemes, planning applications to extend the time limits or written confirmation that there is a continued intention to pursue development of the site.

3.29 This leaves a balance of 20 sites with a potential yield of 29 units on sites with unimplemented planning permission where there remains some uncertainty over whether the development will be delivered, and where no further information could be obtained.

Expired Sites/Abandoned Schemes

3.30 Of the 348 potential dwellings identified as having potential from sites where works had not started, 20 of these units have now expired or have been abandoned.

3.31 Of these 20 units; 9 dwellings are on sites where permissions have expired and where future intention is unknown. An additional 9 units should be removed from the housing supply from sites where an existing consent remains, but where the applicant or agent

have expressed that the scheme has been abandoned and will not be delivered during the plan period.

3.32 Two of the land owners, accounting for 2 units, have indicated that they are likely to re-apply in the future to pursue the development again. Whilst these sites do have a prospect of coming forward within the plan period, it is not possible to accurately plan for these until consent is obtained again. As such these units have cautiously been removed from the “outstanding permissions” section of the housing land supply.

Updating Contribution of Outstanding Consents

3.33 **Tables 2 and 3** below set out the status of the 877 units previously identified as outstanding permissions.

3.34 Taking account of the research carried out above, the Council’s outstanding planning permissions that will continue to contribute to the overall housing land supply are summarised in **Table 2**.

3.35 It can be seen that 610 of the 877 units from outstanding commitments are on sites where units are now under construction. In addition 15 units are now complete that had not started as at 1 April 2009.

3.36 There are 228 units where works have not yet begun that could potentially expire. Of these 228 units, 199 units would come from sites where there is a confirmed intention to develop the site, which shows a realistic prospect of them still being delivered. The remaining 29 units come from sites where intentions as to whether the development will be delivered over the plan period are unknown.

Table 2: Summary of progress of outstanding permissions as 1 April 2010.

Outstanding Permissions Component	Number of Units	
	01.04.2009	01.04.2010
Units from sites under construction (Unable to expire)	529	610*
Units not started as at 1 April 2009 but now completed	N/A	15
Units from sites not started with unknown intentions as to whether it will be developed.	348	29
Units from sites not started but with known intentions to continue development		199
TOTAL	877	853

Source: SDC

* This figure equals the 529 under construction as at 01.04.09 plus the further 81 units from where works have since commenced

** Note this breakdown was not available at the time of the SHLAA Update Report 2009

- 3.37 Whilst the lack of contact doesn't mean that the schemes have been abandoned, these are the sites that could be potentially considered uncertain and could be considered for a non implementation rate, or removal from the housing supply.
- 3.38 **Table 3** sets out the details of the 24 lost sites to be removed from the housing land supply.

Table 3: Summary of previous outstanding permissions to be removed from supply.

Outstanding Permissions Component	Number of Units
Units from Expired Sites but where it has been expressed the development may apply for the proposal again in the future	2
Units from Expired Sites but where it is unknown whether the development may be applied for again in the future	9
Units from Expired or Existing Sites where it has been made clear that the development will not be applied for again in the future.	9
Units lost as a result of amended schemes with net unit reductions	4
GRAND TOTAL	24

Source: SDC

- 3.39 The overall conclusion with regards to the loss of outstanding permissions is that there is a net reduction of 24 units in the housing land supply. Whilst this is a slight decrease compared to the published Core Strategy data, most sites have more certainty about their delivery either because of a confirmed intention to develop or they have now started or are now complete.

Non Implementation Rates

- 3.40 Taking the above findings into consideration, it can be seen that 24 units should definitely be deleted from the housing land supply due to the loss of the above permissions. This is therefore considered to be a minimum level of discount that should be taken from the overall supply.
- 3.41 Further to this there are 29 units with unknown intentions regarding whether they will be delivered. Assuming all of these expire this would give a further deletion of 29 units, making a total of 53 units to be deleted for non implementation. However the Council do not consider that just because the intentions are unknown that the scheme has been abandoned, therefore the cumulative total of 53 units to be removed is considered the maximum discount that should reasonably be applied. The remainder have either started or are confirmed to go ahead and should not be discounted.

- 3.42 The methodology of a discount based on past trends used in the SHLAA resulted in 42 units being removed for non implementation. It can be seen from the research carried out that this figure sits within the range of discount identified by this update work (i.e. between 29 and 53 units) , demonstrating that the methodology based on historic trends is a sound approach and does not grossly over or under estimate the level of discount that should be applied.
- 3.43 Some representations to the Core Strategy suggest that a 10-20% discount should be applied to the whole of the 877 outstanding planning permissions, resulting in approximately 87 units being deleted. Regardless of the information in this update on developer intentions the Council do not accept that a discount is justified for sites under construction and that consequently a 10% discount applied to all permissions is tantamount to a substantially larger discount on the minority of outstanding permissions that have not yet started.
- 3.44 The deletion of 87 units would represent a figure well in excess of the maximum discount in para 3.42 above and would effectively mean discounting sites where there is recent confirmation of an intention to develop. A 20% discount on all outstanding permissions (equivalent to 174 units) would mean discounting most sites with a confirmed intention to develop. A 10% reduction on sites not yet started (23 units) would result be closer to the range identified above.

4 IDENTIFIED SITES – OUTLINE PLANNING PERMISSIONS

- 4.1 The Core Strategy housing supply figures, as set out at para 4.1.9 of the document, differs in presentation from the final table of the SHLAA in terms of the potential units coming from “Identified Sites”. This is because the final figures presented in the SHLAA include outline planning permissions, which were reviewed as part of the SHLAA process and included within the total for potential allocation sites of over 0.2 hectares together with other potential allocations.
- 4.2 The published Core Strategy presents Outline permissions in a differing way due to the fact that the principle of development has been established and that they are already part way through the planning process. As such, Outline planning permissions are included in the “Outstanding Permissions” category rather than the “Potential Allocations”.
- 4.3 Within the Core Strategy 531 units of the housing supply were derived from sites over 0.2ha with Outline planning permission.
- 4.4 To provide more certainty with regards to the deliverability of these Outline permissions, the applicants of all the sites were written to and asked as to whether there is a continued intention to develop, and if so the broad timescale for works to commence.
- 4.5 The results of the exercise demonstrated that of the 531 units from Outline consents, **529 units** have a confirmed intention to proceed. The loss of two units has come from two single dwelling sites, both of which have abandoned the idea of putting an additional unit within their curtilage.
- 4.6 As the SHLAA had a site threshold of 0.2ha there were a small number of Outline planning permissions on sites under this size that were excluded in error from the housing land supply. These outline consents of under 0.2 ha consist of four sites with a total yield of **10 units**.
- 4.7 **Table 4** sets detail of all of the Outline consents that contribute to this section of the supply.
- 4.8 Overall it can be seen that there is a slight increase in provision coming from Outline planning permissions, but broadly that the contribution from outlines remains consistent with the predictions set out in the Core Strategy.

4.9 A detailed list regarding the subsequent changes following this work is included at **Appendix 3.**

Table 4: Sites with Outline Planning Permission that continue to contribute to housing supply

Site Address	2009 Yield	2010 Yield	+/-
Outline Planning Permissions Over 0.2ha			
West Kent Cold Store, Rye Lane, Dunton Green	500	500*	0
Town Council & Red Cross Offices Bradbourne Vale Road, Sevenoaks	5	5	0
Cross Key House, Ashgrove Road, Sevenoaks	2	2	0
Little Blackhall, Blackhall Lane, Sevenoaks	1	1	0
Land Adjacent to Whyteladies, Wildernesse Avenue, Sevenoaks	1	1	0
Land North Gossview Kingsingfield Road West Kingsdown	5	5	0
167 Hever Avenue West Kingsdown	3	3	0
31-37 Park Lane Kemsing	10	10	0
43/45 Pilgrims Way (Falconers Down) Kemsing	2	2	0
Canes Hopparden Lane Sevenoaks	1	0	-1
Sanctuary, Gorsewood Road, Hartley	1	0	-1
Sub total	531	529	-2
Outline Planning Permissions Under 0.2 ha			
Land Adjacent to Arosa Gresham Avenue Hartley	0	1	+1
49 Chipstead Lane Chevening	0	1	+1
Galleons Lap London Road West Kingsdown	0	1	+1
20 St. Botolphs Road Sevenoaks	0	7	+7
Sub Total	0	10	+10
GRAND TOTAL	531	539	+8

Source: SDC

* Note: Whilst Phase 1 has been granted reserved matters consent the majority of the site is only covered by an Outline permission.

5 PROPOSED ALLOCATIONS

- 5.1 The “Proposed Allocations” are those sites that have been identified for housing allocation through the SHLAA, but have yet entered into the planning process through the approval of a Full or Outline planning permission. These “Proposed Allocations” also include sites previously allocated in the Local Plan and a site suggested for allocation that was previously safeguarded for development.
- 5.2 The methodology of the SHLAA is considered to remain sound, and it is not felt that there is a justification to reconsider Green Belt sites or the other constraints such as flooding that precluded development potential. However in order to ensure that the sites identified for future housing remained credible, it was necessary for us to review these sites to see whether they continued to meet the tests of deliverability and to ensure that each sites has sufficient evidence to support their contribution to housing supply
- 5.3 Whilst we had received many written responses from land owners and developers of the sites either as part of the SHLAA process, or during the Allocations (Options) DPD consultation, it was felt that a consistent level of information was required. Therefore the owner or promoter of each of the identified the site has been contacted to establish their current intentions and have been requested to complete and return a proforma detailing the key issues surrounding deliverability. A copy of the proforma is included at **Appendix 4**.
- 5.4 Where evidence from the owner or from the response to the consultation has arisen that questions the intention to develop the inclusion and/or capacity of the site has been reviewed or if necessary been deleted.

Summary of findings

- 5.5 978 units of the housing land supply were previously deemed as “Proposed Allocations” in the Core Strategy. **Table 5** below provides an update of the overall situation following the update research.

Table 5: Proposed Allocations

Site Address	2009 Yield	2010 Yield	+/-
Proposed Allocations (new SHLAA sites no permission)	890		
Proposed Allocations now with full PP post 1.4.09		117	
Proposed Allocations (no permission confirmed to proceed)		731	
Proposed Allocations (potential capacity loss)			-42
Proposed Allocations (potential capacity gain)			+215
Previous Local Plan Allocations	58	58	0
Land Safeguarded in Local Plan	30	30	0
GRAND TOTAL	978	936	

Source: SDC

5.6 890 units of these were on new sites identified through the SHLAA process. Planning permission has since been granted for 117 units on two sites, St Bartholomew’s Hospital Laundry (65 units) and the former Police Station in Morewood Close Sevenoaks (52 units). Of the remaining sites with capacity for 773 units, sites with a capacity of **731 units** remain from these identified sites, where we have continued to receive confirmed intention to develop from land owners., Confirmation of intention to proceed has also been received for the previous Local Plan allocations that are being carried forward and the safeguarded site in Westerham that is proposed for release.

5.7 There is a potential loss of capacity on three sites totalling 42 units. The reduction can be accounted for, firstly by the loss of part of the Déjà vu and land to the north site in Swanley, where planning permission has been granted for a hotel, secondly by uncertainty over land south of Moat Cottage Otford due to archaeological concerns, which may affect the scope for development, and thirdly by the permission granted at the former police station in Morewood Close Sevenoaks for a reduced number amount of units compared to the SHLAA assessment. **Table 6** sets out the areas where capacity may be lost.

Table 6: Potential losses

Site Address	2009 Yield	2010 Yield	+/-
Proposed Allocations			
Former Déjà vu Site, Swanley	34	15	-19
Field South of Moat Cottage Otford	9	0	-9
Full Planning Permissions			
Police Station Morewood Close Sevenoaks	66	52	-14
			-42

Source: SDC

5.8 There are also potential gains. The promoters of two of the larger sites that are proposed for allocation have submitted detailed representations that their sites can accommodate more units than what has been identified by the Council. The details of

these potential increases will be explored in further detail during the preparation of the Allocations DPD, however if acceptable these could accommodate up to approximately 215 additional units. At this stage it can reasonably be assumed that the potential gains should at least balance the losses. Details of the proposed increases are detailed in **Table 7**.

Table 7: Potential Gains

Site Address	Promoted Increase
Cramptons Road Waterworks Site	35 Units
United House, Swanley	180 Units
TOTAL	215 Units

Source: SDC

Non Implementation

- 5.9 It is not considered appropriate to apply a non implementation rate to identified sites as this would involve the removal of specific sites where owners have expressly said that the site will be developed.

6 WINDFALL ALLOWANCE

- 6.1 As detailed in the SHLAA, records consistently show a high level of windfall sites within the District. Whilst SHLAA guidance states these should not be relied upon for the first ten years of the plan period, it remains safe to assume that after 10 years a regular supply of windfall sites will be delivered.
- 6.2 The figure for a small scale windfall allowance from sites under 0.2ha is considered to remain justified and therefore not been amended from that referred to in the Core Strategy.
- 6.3 The rate remains applied for the time period ten years from the base date of 1 April 2009 until the end of the plan period, which results in 525 units coming forward between 2019-2026.
- 6.4 More comprehensive justification of the small scale windfall allowance please see the SHLAA Update Report 2009 (paras 8.11-23).

7 SUMMARY

7.1 A full summary of each component of the updated housing land supply is included in **Table 8** below, including a summary of the cumulative increase or decrease against the figures that formed the Core Strategy.

Table 8: Summary of housing supply differences

Housing Supply Component	2009 Yield	2010 Yield	+/-
Completions			
2006-2009	692	692	-

See table 1 (page 7)

Housing Supply Component	2009 Yield	2010 Yield	+/-
Outstanding Planning Permissions			
Now complete	0	15	+15
Under construction	529	610	+81
Sites with confirmed intentions	348	199	-120
Sites with unconfirmed intentions		29	
Sites unlikely to proceed		24	
Non implementation discount	-42*	-24	+18
		-53	-11
Sub Total	835	853	+18
		824	-11

See tables 2 and 3 (Pages 12-13)

• Based on SHLAA methodology see para 3.42

** Based on minimum and maximum estimates – see para 3.41

Housing Supply Component	2009 Yield	2010 Yield	+/-
Outline Permissions			
Outline Planning Permissions Over 0.2ha	531	529	-2
Outline Planning Permissions Under 0.2ha	0	10	+10
Sub Total	531	539	+8

See table 4 (Page 16)

Housing Supply Component	2009 Yield	2010 Yield	+/-
Proposed Allocations			
Proposed Allocations (No permission)	890	731	-159
Proposed Allocations now with full PP		117	+117
Previous Local Plan Allocations	58	58	-
Land Safeguarded in Local Plan	30	30	-
Sub Total	978	936	-42

See Table 5 (Page 18)

Housing Supply Component	2009 Yield	2010 Yield	+/-
Proposed Allocations			
Proposed Allocations (potential capacity loss)	-	-42	-42
Proposed Allocations (potential capacity gain)	-	+215	+215

See Tables 6 and 7 (Pages 18 and 19)

Housing Supply Component	2009 Yield	2010 Yield	+/-
Windfall Allowance			
Windfall Allowance	525	525	-

See chapter 6 (Page 20)

Source: SDC

7.2 It can be seen from the table that the update figures remain broadly in line with the figures in the published Core Strategy. Completions have increased, along with the number of consents that have commenced construction. There are slight decreases in

the level of outstanding planning permissions, which is accounted for by the fact that many units in this category have moved in to the "completed" or "under construction" category.

- 7.3 The proposed allocations have been reduced slightly as a result of two sites failing to be shown to be deliverable or alternative uses being granted. Notwithstanding, several of these proposed allocation sites have significantly progressed to the stage that full consent is granted and works have commenced.
- 7.4 Following representations on the Draft Allocations DPD two significant site promoters have submitted detailed representations on how their respective sites can accommodate significantly great levels of development that what was initially assessed by the Council. Whilst these representations require some more detailed assessment, if supported these would provide a significant further increase in housing supply.

8 CONCLUSIONS

- 8.1 The purpose of this exercise was to update the numbers based on the most recently available data in order to inform the Independent Examination of the Core Strategy.
- 8.2 **Table 8** above demonstrate that the Sevenoaks housing supply is made up by a number of different components.
- 8.3 It can be seen that prior to any discount being applied for non implementation that a significant number of units of the housing land supply are in the form of existing commitments from sites currently under construction or with Full or Outline planning permission. The level of sites with uncertainty over development is very low.
- 8.4 The sites identified for potential allocation are assessed as being suitable, available and achievable for allocation (as deemed through the SHLAA process) and a small site allowance for windfall sites for the final seven years of the plan period remains justified.
- 8.5 The methodology for applying a reduction for non implementation based on past trends, as set out in the SHLAA, is considered to remain the soundest approach. The 42 units to be discounted based on this method is consistent with the findings of this report which suggests a minimum level of discount should be 24 units to account for the removal of those sites that have recently expired and that a maximum level should be 53 units, based on the deletion of all expired consents and those with unknown intentions.
- 8.6 The paper demonstrates that if a 10% or 20% non implementation rate be applied to these figures then the discount would result in the deletion of provision on sites where a the land owner had expressly stated that there is a continued intention to development the site.
- 8.7 In conclusion the update supports the existing figures published in the submission draft of the Core Strategy and demonstrates the Council maintains a credible and robust housing supply.

APPENDIX 1- OUTSTANDING COMMITMENTS: SITES UNDER CONSTRUCTION AT 1.4.2009.

Address	Parish	Planning Reference	OSC	UC	Total Site Yield
The Nursery School The Street	Ash-cum-Ridley	SE/03/02193	0	1	1
Oakley Oak Farm Lane	Ash-cum-Ridley	SE/07/00277	0	1	1
The Pollard Ash Road	Ash-cum-Ridley	SE/08/01151	0	1	1
The Willows Brasted Hill	Brasted	SE/06/00989	0	1	1
Stable Cottage Stonewall Park	Chiddingstone	SE/06/02340	0	1	1
Leighton Manor Spode Lane	Cowden	SE/03/01518	0	1	1
*Basing Farm Furnace Lane	Cowden	SE/05/01710	1	0	1
Mill House Mill Road	Dunton Green	SE/99/01589	0	2	2
25 High Street	Edenbridge	SE/06/00605	0	2	2
Land Rear of 36 High Street	Edenbridge	SE/06/02181	0	5	5
Broxham House Prettymans Ln	Edenbridge	SE/04/02530	0	1	1
Skeynes Farm Lingfield Road	Edenbridge	SE/06/00105	0	3	3
Penlee Hawthorns & Eden Lodge Station Road	Edenbridge	SE/07/03881	0	34	34
Eynsford Filling Station High St	Eynsford	SE/07/02496	0	12	12
19-20 Oliver Crescent	Farningham	SE/08/00557	0	5	5
Oakwood House Manor Lane	Fawkham	SE/05/01465	0	1	1
Malabar Valley Road	Fawkham	SE/08/00385	0	1	1
Squirrels Haunt Gorsewood Road	Hartley	SE/07/00282	0	2	2
Annlea Ash Road	Hartley	SE/08/01436	0	1	1
Furnace Orchard Furnace Farm Four Elms Hever	Hever	SE/01/02750	0	1	1
16 Victoria Hill Road	Hextable	SE/06/01519	0	1	1
Boyneswood Mussenden Lane Horton Kirby	Horton Kirby & South Darenth	SE/07/01373	0	1	1
*Horton Kirby Paper Mill, South Darenth	Horton Kirby & South Darenth	SE/05/02000	133	41	174
23 Dynes Road Kemsing	Kemsing	SE/03/00670	0	2	2
13 Childsbridge Lane & (Land Rear of 11-17)	Kemsing	SE/06/03064	0	4	4
The Crown Main Road	Knockholt	SE/08/02405	0	1	1
28 Ryecroft Road	Otford	SE/08/02274	0	1	1
*64 & 66 Well Road	Otford	SE/07/02776	9	4	13
Eastern Apartment Block Swaylands Sch	Penshurst	SE/07/01750	0	10	10
Western Apartment Block Swaylands Sch	Penshurst	SE/07/02079	0	10	10
*Cone Hill Stone Street	Seal	SE/07/00908	1	0	1
Broomfield Stone Street	Seal	SE/07/03687	0	1	1
2 Oastfield Court High Street	Sevenoaks	SE/08/01641	0	2	2
11 Wickenden Road	Sevenoaks	SE/07/03537	0	2	2
Land adjoining 2 Hurst Way	Sevenoaks	SE/06/00648	0	2	2
22 Mill Lane	Sevenoaks	SE/08/03029	0	2	2
1 Wickenden Road	Sevenoaks	SE/07/03534	0	2	2
37 Weald Road	Sevenoaks	SE/04/00613	0	1	1
80 St Johns Road	Sevenoaks	SE/03/02900	0	2	2
Land Adj to 15-25 Watercress Drive	Sevenoaks	SE/07/03282	0	2	2
19 Pembroke Road	Sevenoaks	SE/07/03966	0	6	6
Lower Fawke Farm Fawke Common Underriver	Sevenoaks	SE/08/00370	0	1	1
Garages West of 100 Bradbourne Vale Rd	Sevenoaks	SE/07/02026	0	5	5
85 Britains Lane	Sevenoaks	SE/09/00298	0	1	1
**Beeches Mount Harry Road	Sevenoaks	SE/06/02429	9	0	9
28 Brattle Wood	Sevenoaks	SE/08/00912	0	1	1
Highcroft 79 Kippington Road	Sevenoaks	SE/07/03381	0	1	1
Oak House London Road	Sevenoaks	SE/05/03042	0	20	20
Railway & Bicycle P.H. 205 London Road Sevenoaks	Sevenoaks	SE/06/02156	0	24	24
The Farmers London Road	Sevenoaks	SE/04/00526	0	23	23
4 Cade Lane Sevenoaks	Sevenoaks	SE/08/01252	0	2	2
Land to the rear of Thornhill & Thornhill Cottage Oak Lane	Sevenoaks	SE/07/02586	0	2	2
Tubs Hill House North London Road	Sevenoaks	SE/06/03211	0	18	18
30 Kippington Road	Sevenoaks	SE/08/01341	0	2	2
The Garden House High Street	Sevenoaks	SE/06/03256	0	1	1

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**35 and 37 Hitchen Hatch Lane	Sevenoaks	SE/08/01681	9	0	9
Green Coppers Wildernesse Avenue	Sevenoaks	SE/08/02343	0	1	1
The Croft Oak Lane	Sevenoaks	SE/04/02029	0	13	13
29 Oakleigh Close Swanley	Swanley	SE/06/01580	0	2	2
Land Adjacent 1 Southview Cl	Swanley	SE/08/00999	0	1	1
Laburnum London Road	Swanley	SE/06/01618	0	2	2
The Old Highway Depot London Road	Swanley	SE/05/00598	0	24	24
*Keston and The Beeches	Swanley	SE/04/02248	25	0	25
26 Hever Avenue	West Kingsdown	SE/05/02947	0	1	1
Colindale Pells Lane	West Kingsdown	SE/08/00771	0	1	1
*Pasadena Park East Hill Road Knatts Val	West Kingsdown	SE/07/03205	10	0	10
*4-6 High Street	Westerham	SE/04/02120	7	0	7
31 The Paddock	Westerham	SE/07/02635	0	1	1
Currant Hill South Bank	Westerham	SE/07/00375	0	2	2
Tree Tops Pilgrims Way	Westerham	SE/06/02946	0	2	2
Cherry Tree Cottage Froghole Ln	Westerham	SE/05/00174	0	1	1
GRAND TOTAL			204	325	529

* Sites where works are underway but no individual units are yet under construction.

** It should be noted that there has been revised schemes granted for the following two sites during the early construction phase. However these revised schemes do not alter the final figure of 529.

Alternative Schemes

Site	Note
**Beeches Mount Harry Road Sevenoaks	Application SE/06/02429 for 9 units has been superseded by application 09/02415/FUL for 11 units. NET INCREASE OF 2 UNITS
**35 and 37 Hitchen Hatch Lane Sevenoaks	Application SE/08/01681 for 10 units has been superseded by Application SE/09/01936/FUL for 8 units. NET DECREASE OF 2 UNITS
Net Change in Units	0

Source: SDC

APPENDIX 2 – OUTSTANDING PLANNING PERMISSIONS NOT STARTED AS AT 1 APRIL 09.

Sites where consents have expired since 1 April 2009 (to be removed from Housing Supply)

Site Address	Parish	Planning Ref	Net Unit
1 and 2 Field Cottages Church Road	Brasted	SE/06/01493	-1
Cornerways Lealands Avenue	Leigh	SE/06/01327	1
54 Queens Drive	Sevenoaks	SE/06/00546	1
1 North View Road	Sevenoaks	SE/04/01226	2
3A Dorset Street	Sevenoaks	SE/04/02418	1
5 Farm Road	Sevenoaks	SE/06/02862	1
75 London Road Sevenoaks	Sevenoaks	SE/06/02206	2
46 Lullingstone Avenue	Swanley	SE/05/00407	1
The Chestnuts Westbury Terrace Westerham	Westerham	SE/03/01870	1
			9

Source: SDC

Sites where consents have expired since 1 April 2009 (to be removed from Housing Supply) but where the land owner has expressed a desire to re-apply and take the scheme forward at a later date.

Site Address	Parish	Planning Ref	Net Unit
39 Southfields Road	West K'down	SE/06/01344	1
The Old Vicarage Vicarage Hill	Westerham	SE/04/02047	1
			2

Source: SDC

Not started where the Agent/Owner has advised that they remain in control of the site, but have no intention to develop (to be removed from Housing Supply)

Site Address	Parish	Planning Ref	Net Unit
1 Abbots Close	Swanley	SE/07/03877	1
6 & 8 Main Road	Swanley	SE/06/00897	-1
2 Aspen Close	Swanley	SE/04/02984	2
50-52 London Road	Sevenoaks	SE/06/03252	3
Kingdom Hall Cedar Terrace Road	Sevenoaks	SE/08/00128	4
			9

Source: SDC

Sites where work is yet to commence but where there is a known intention to pursue the development.

Site Address	Parish	Planning Ref	Net Unit
Two Rivers Stairfoot Lane	Chevening	SE/08/02558	1
The Barn Sharps Place Baileys Hill Road	Chiddingstone	SE/04/02299	1
Woods Tackle Shed Redleaf Estate Yard Camp Hill	Chiddingstone	SE/07/03588	1
50 Newports	Crockenhill	SE/08/02030	1
Land North of 48 Green Court Road Crockenhill	Crockenhill	SE/05/01326	1
Land adjacent 17 Rye Lane	Dunton Green	SE/04/02113	1
Timbers Station Road	Edenbridge	SE/05/00948	1
Land West of 124-128 High Street	Edenbridge	SE/07/03351	5
Land Rear of 29-31 High Street	Edenbridge	SE/04/01200	3
92B High Street	Edenbridge	SE/08/01727	1
Land East of Florence Cottages High Street	Edenbridge	SE/09/00131	5
Marlpit House and The Chase Main Road	Edenbridge	SE/08/02014	10
Romani Way Hever Road (Gypsy Site)	Edenbridge	SE/08/01242	4
Eden Valley School	Edenbridge	SE/07/01932	40
67 High Street	Edenbridge	SE/07/03631	11
Land North of Presbytery Catholic Church of St Laurence High Street	Edenbridge	SE/04/03102	5
Land West Of 96 - 98 High Street	Edenbridge	SE/07/00355	6
Parsonage House High Street	Eynsford	SE/07/03177	1
South Hall High Street	Farningham	SE/08/03160	1
Kilndown Gorsewood Road Hartley	Hartley	SE/07/00247	1
5 Wellfield	Hartley	SE/07/00880	1
Terrys Farm Rectory Lane	Hever	SE/05/00249	1
Lake House Four Elms Road	Hever	SE/07/02301	1
Lockhurst Farm Prettymans Lane	Hever	SE/05/00505	1
Lockhurst Farm Prettymans Lane	Hever	SE/05/00503	1
Lockhurst Farm Prettymans Lane	Hever	SE/05/00507	1

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4 The Green Lane	Leigh	SE/06/01042	1
Bat & Ball PH High Street	Leigh	SE/08/02946	1
1 The Square	Riverhead	SE/08/03325	2
River House London Road	Riverhead	SE/08/02467	4
Peal Chase Ash Platt Road	Seal	SE/08/03347	1
Sealclean Wildernesse Avenue Seal	Seal	SE/05/01287	19
8A Bradbourne Park Road	Sevenoaks	SE/07/01012	1
8 Chipstead Lane Sevenoaks	Sevenoaks	SE/05/01646	1
65 - 67 Bradbourne Vale Road	Sevenoaks	SE/08/00399	2
Falcon House 4A Knole Paddock Seal Hollow Road	Sevenoaks	SE/08/00154	2
47 London Road	Sevenoaks	SE/05/01601	3
51 High Street	Sevenoaks	SE/07/03226	7
South Park Medical Practice South Park	Sevenoaks	SE/07/01359	6
Penryn Grassy Lane	Sevenoaks	SE/07/02822	2
96 High Street	Sevenoaks	SE/05/00521	10
42 Garth Road	Sevenoaks	SE/08/01358	1
Southernwood 85 Kippington Road	Sevenoaks	SE/08/00360	1
Hollym Clenches Farm Lane	Sevenoaks	SE/07/00296	2
22 St. Georges Road	Sevenoaks	SE/07/02324	5
48 The Rise	Sevenoaks	SE/08/02880	1
Woodland Chase, Godwins & Brackens Blackhall Lane	Sevenoaks	SE/06/01442	5
Waggon Lodge Scollops Ide Hill	Sundridge	SE/07/03467	1
The Kent Hounds Well Hill Chelsfield	Shoreham	SE/07/03778	1
Land adjacent to 61 Shurlock Avenue	Swanley	SE/07/03507	10
1 The Green & 4 London Road	Westerham	SE/06/01850	2
Land adj to 26 Oaklands Close	West K'down	SE/08/03077	1
Merrivale Rushetts Road	West K'down	SE/08/00768	1
TOTAL			199

Source: SDC

Sites where work is yet to commence and where there is unknown intentions regarding the development.

Site Address	Parish	Planning Ref	Net Unit
1 and 2 South Ash Manor Cottages South Ash Road	Ash-cum-Ridley	SE/08/00923	-1
Crockenhill Cp School Stones Cross Road	Crockenhill	SE/07/01415	1
6 Station Road	Dunton Green	SE/07/03655	1
Land South East of 6-16 Ryewood Cottages Rye Lane	Dunton Green	SE/08/01523	4
17 Springfield Road	Edenbridge	SE/07/03269	1
Land at Station Road	Edenbridge	SE/07/03576	2
Beechwood Four Elms Road	Edenbridge	SE/07/03609	2
Anvil House Station Road	Eynsford	SE/07/00537	1
Hartley Court Church Road	Hartley	SE/08/03097	1
Falconers Down (plot 4) Pilgrims Way	Kemsing	SE/07/03946	1
Land adjacent to 26 Grange Road	Sevenoaks	SE/08/02587	1
1 Cramptons Road	Sevenoaks	SE/08/00968	1
14 Silk Mills Close	Sevenoaks	SE/07/01262	1
Braeside Oak Avenue	Sevenoaks	SE/08/02088	1
Little Julians Little Julians Hill	Sevenoaks	SE/07/01558	1
58-60 Oakhill Road	Sevenoaks	SE/07/02280	8
Bambi Cottage Parkfield	Sevenoaks	SE/08/00802	1
Land Rear of High Trees Wildernesse Avenue	Sevenoaks	SE/08/01218	1
2 Cherry Avenue	Swanley	SE/08/01253	1
TOTAL			29

Source: SDC

Sites previously not started but where works have commenced since 1 April 2009

Site Address	Parish	Planning Ref	Net Unit
Mill Farm Church Road	Brasted	SE/08/02790	1
Oakenden Oakenden Lane	Chiddingstone	SE/07/02069	1
Lower Basings Farm Furnace Lane	Cowden	SE/05/01559	2
The Stable Barn - Lot 2 Hilders Farm Hilders Lane	Edenbridge	SE/06/00346	1
To the Rear of Tamerton Castle Hill Barn	Fawkham	SE/07/03642	1
Halstead Place School Church Road	Halstead	SE/08/01915	31
The Laurels Woodlands Avenue	Hartley	SE/07/02910	1
Top-O-The-Hill Church Road	Hartley	SE/09/00192	1
Land adj 11 Coopers Close	Horton Kirby & South Darenth	SE/06/00919	1

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75 Noahs Ark	Kemsing	SE/07/03461	5
13-14 Spring Head Road	Kemsing	SE/07/01140	3
11-25 West End	Kemsing	SE/07/03190	2
Cleves (Youth Hostel) Church Lane	Kemsing	SE/08/00719	7
61 Seal Hollow Road	Sevenoaks	SE/08/00562	1
Oak End 1 High Street Sevenoaks	Sevenoaks	SE/04/01504	1
Land West Of Oak End 1 High Street	Sevenoaks	SE/08/02137	1
Former BMW Garage 5 Dartford Road	Sevenoaks	SE/07/03280	11
White Cottage Scabharbour Road	Sevenoaks Weald	SE/07/02977	2
New House Farm Hale Oak Road	Sevenoaks Weald	SE/04/03020	2
152 Main Road	Sundridge	SE/06/02224	1
T P P Ltd and 14 Rysted Lane	Westerham	SE/07/03648	3
Oast Tops Mapleton Road	Westerham	SE/07/01684	1
Hollyville Café London Road	West Kingsdown	SE/08/02593	1
TOTAL			81

Source:SDC

Sites previously not started but where works have been completed since 1 April 2009

Site Address	Parish	Planning Ref	Net Unit
Ridley Farm Bunkers Hill Road	Ash-cum-Ridley	SE/08/02027	1
64 - 70 Westerham Road	Chevening	SE/06/00566	-4
Chequers Garage Chequers Hill Bough Beech	Chiddingstone	SE/06/01226	1
Hoath House Walnut Tree Cross Chiddingstone Hoath	Chiddingstone	SE/08/03114	3
48 Lennard Road	Dunton Green	SE/07/00878	1
Land adj. to Chalgrove Crouch House Road	Edenbridge	SE/06/01151	1
Hillside Valley Road Fawkham	Fawkham	SE/06/02239	1
Turn Again House Ash Road	Hartley	SE/09/00109	2
Land to Rear of 29 Beechy Lees Road	Kemsing	SE/08/00059	1
Land to the rear of 43 and 45 Park Hill Road Otford	Kemsing	SE/07/03927	3
Land to the rear of 22 The Charne	Otford	SE/08/00609	3
Walters Green Farm Walters Green Road Penshurst	Penshurst	SE/06/00373	1
Land Adjacent 24 Mill Lane	Sevenoaks	SE/07/00547	1
TOTAL			15

Source: SDC

Note - Where unit number is in red these indicates that a more recent consent has amended the number of net units likely to be yielded at the site.

APPENDIX 3 – UPDATE OF IDENTIFIED SITES

Sites Identified during SHLAA Process for allocation where Outline of Full Permissions exist.

Site Address	SHLAA Net Dwg	Update Notes	Revised Yield
West Kent Cold Store, Rye Lane, Dunton Green	500	Works commencing by Berkeley Homes following recent Reserved Matters approval	500*
Town Council & Red Cross Offices Bradbourne Vale Road, Sevenoaks	5	Outline consent 06/00034/FUL exists for redevelopment of site. STC confirm continued intention to develop and 0-5 years remains accurate (Telephone call 16/04/10)	5*
Cross Key House, Ashgrove Road, Sevenoaks	2	Outline Consent SE/06/01539 granted as at 1 April 2009. Subsequent Full consent 09/02368/FUL granted. Will move to existing commitments list at year end monitoring	2*
Little Blackhall, Blackhall Lane, Sevenoaks	1	Outline SE/08/01153 granted. Reserved Matters Application pending consideration as at April 2010	1*
Land Adjacent to Whyteladies, Wildernesse Avenue, Sevenoaks	1	Outline 06/01802 exists and application 10/00462 granted April 2010 to extend the life of the scheme, demonstrating a continued intention to develop the site.	1*
Land North Gossview Kingsingfield Road West Kingsdown	5	06/03016/OUT granted for 5 eco dwellings. Confirmed continued intention to develop.	5*
167 Hever Avenue West Kingsdown	3	Outline consent 07/00818/OUT granted at appeal in July 2008. Agent confirmed a continued intention to develop when market picks up.	3*
31-37 Park Lane Kemsing	10	Outline consent 08/02245/OUT has been granted for this development. Kentmere Homes advised that still within their ownership/control, but on hold due to recession. Expressed 0-5 still most appropriate.	10*
43/45 Pilgrims Way (Falconers Down) Kemsing	2	Continued intention to develop. Two plots are included in extant figures. This relates to the other two plots where subsequent Planning Permissions were granted after 1 April 2010	2*
Canes, Hopparden Lane, Sevenoaks	1	Outline Consent SE/07/03023 granted on appeal in November 2008. Reserved Matters yet to be submitted Agent advised that the development is unlikely to move forward. As such removed due to uncertainty.	0
Sanctuary, Gorsewood Road Hartley	1	Outline Consent 06/02267 Granted. No subsequent reserved matters and since expired. Remove from housing supply	0
Previous Total	531		Update Total
			529

Source: SDC

Sites under 0.2ha with Outline Planning Permission (Previously missed for the housing land supply)

Site Address	Ref No	Update Notes	Revised Yield
Land Adjacent to Arosa Gresham Avenue Hartley	SE/07/03521	Outline Consent Granted which remains valid. No reserved matters received to date	1
49 Chipstead Lane Sevenoaks	SE/08/02925	Outline Consent Granted which remains valid. No reserved matters received to date	1
Galleons Lap London Road West Kingsdown	SE/07/01770	Outline Consent Granted which remains valid. No reserved matters received to date	1
20 St. Botolphs Road Sevenoaks	SE/08/00087	Outline Consent Granted which remains valid. No reserved matters received to date	7
			10

Source: SDC

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Previoulsy Identified SHLAA Site with Full Planning Permission

Site Address	SHLAA Net Dwg	Update Notes	Revised Yield
St. Batholomews Hospital Laundry Bonney Way, Swanley	65	<i>Site Under Construction. Will move to existing commitments list at year end monitoring</i>	65
Police Station Morewood Close, Sevenoaks	66	<i>Planning Permission now granted at the site - Two consents exist; original for 59 and a subsequent consent for 52 units. Previous capacity reduced by 14 units to reflect consent most likely to be implemented.</i>	52*
Previous Total	131	Update Total	117

Source: SDC

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Sites Identified during SHLAA Process for allocation

Site Address	SHLAA Net Dwg	Update Notes	Revised Yield
Land at Cedar Drive, Edenbridge	7	<i>SDC Owned Land – Property Section confirmed there still is an intention to develop the land – July 2009</i>	7
Cramptons Road Water Works, Otford	55	<i>Representations made to the Allocations (Options) DPD regarding the intention to redevelop. Developer proposes up to 90 units - To be further reviewed before any figures adjusted.</i>	55
Johnsons (School Land at Oak Lane & Hoggarden Lane). Sevenoaks	34	<i>Representations made to the Allocations (Options) DPD regarding the continued intention to redevelop March 2010 – may require a review to the density</i>	34
Sevenoaks School Land at Oak Lane & Hoggarden Lane, Sevenoaks	37	<i>Representations made to the Allocations (Options) DPD regarding the continued intention to redevelop March 2010 – may require a review to the density</i>	37
Sevenoaks Gasholder Station, Cramptons Road, Otford	48	<i>Representations made to the Allocations (Options) DPD regarding the intention to redevelop - March 2010</i>	48
Land West of Bligh’s Meadow, Sevenoaks	59	<i>Negotiations ongoing between SDC and other landowners including the production of a development brief.</i>	59
Greatness Mills, Mill Lane, Sevenoaks	20	<i>Planning Application granted for conversion of listed barn 9 units only under 08/01179. Promoter advised that the wider sites remains in the applicants ownership, but in current market conditions the greater redevelopment is unviable. As such advised unlikely to come forward in 0-5 years. Timescales to be reviewed by SDC</i>	20
Swanley Centre, Nightingale Way Swanley	128	<i>Representations made to the Allocations (Options) DPD regarding the continued intention to redevelop March 2010</i>	128
Former Déjà vu Site and land to the north. Swanley	34	<i>Application for alternative use on part of the identified granted under application 10/00697/FUL. This deletes part of the developable area (0.62 ha) but leave a section remaining (0.5 ha). The promoter of the adjoining land outside the application site confirms a continued intention to develop. Yield reduced by 19 units as a result of approval</i>	15
Land West of Cherry Avenue Swanley	75	<i>Confirmed intention to develop the site through the SHLAA Update process</i>	75
Corner of Birchwood Park Avenue & Bartholomew Avenue Swanley	4	<i>Representations made to the Allocations (Options) DPD regarding the continued intention to redevelop March 2010</i>	4
United House, Goldsel Road	116	<i>Representations made to the Allocations (Options) DPD regarding the intention to redevelop proposes greater capacity(Approx 300units), however such proposal requires greater assessment by SDC</i>	116
Bevan Place (Land Outside LP Allocation) Swanley	24	<i>Confirmed intention to develop the site was received from SDC and WKH through the SHLAA Update process</i>	24
57 Top Dartford Road Hextable	14	<i>Representations made to the Allocations (Options) DPD regarding the intention to redevelop</i>	14
Land rear of Garden Cottages Leigh	13	<i>Representations made to the Allocations (Options) DPD regarding the intention to redevelop</i>	13
New Ash Green Village Centre New Ash Green	50	<i>Ongoing discussions regarding Regeneration Proposals</i>	50
Foxs Garage, London Road Badgers Mount	18	<i>Representations made to the Allocations (Options) DPD regarding the intention to redevelop</i>	18
Field South of Moat Cottage, Station Road Otford	9	<i>Representations made to the Allocations (Options) DPD regarding the intention to redevelop. Concerns regarding Archaeology however developers have started an intention to continue promotion and address these issue.s Deleted in view of KCC Archaeology comment, however under continual review</i>	0
West Kingsdown Industrial Estate London Road West Kingsdown	14	<i>Representations made to the Allocations (Options) DPD regarding the intention to redevelop</i>	14
Previous Total	759		Update Total 731

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Source: SDC

Previous Sites Allocated in the Sevenoaks District Local Plan

Site Address	SHLAA Total net Dwellings	Update Notes	Expected Yield Yrs 0-5
Car Park Hitchen Hatch Lane, Sevenoaks	10	<i>Representations made to the SHLAA Update 2009 regarding the intention to redevelop</i>	10
Swanley Bus, Garage	20	<i>Representations made to the SHLAA Update 2009 regarding the intention to redevelop</i>	20
Swanley, Bevan Place	28	<i>Representations made to the SHLAA Update 2009 regarding the intention to redevelop</i>	28
Previous Total	58	Update Total	58

Source: SDC

Sites previously Safeguarded for Development in the Sevenoaks District Local Plan

Site Address	SHLAA Total net Dwellings	Update Notes	Expected Yield Yrs 0-5
Land Adjacent to London Road Westerham	30	<i>Representations made to the SHLAA Update 2009 and Allocations (Options) DPD regarding the intention to redevelop</i>	30
Previous Total	30	Update Total	30

Source: SDC

APPENDIX 4 – HOUSING LAND SUPPLY PROFORMA AND OUTSTANDING PERMISSION LETTER



Please provide answers to all of the following questions to ensure that the site continues to be considered for future housing or residential led mixed use allocation.

Site Address:	
Owner's Address:	Agent's Address (if applicable):
Telephone No:	Telephone No:
E-mail:	E-mail:

Please tick the relevant box:				
Are you/your client still promoting the site for a housing/residential led mixed use development?	Yes		No	
Are you/your client the owner/developer with sole control over developer rights of the site?	Yes		No	
If no, please provide contact details for the other landowners/developers who have control of the site.				
Is there an existing use currently operating on the site?	Yes		No	
If yes, what is the use?				
Do you consider that the site will be viable for residential or residential led mixed use development during the LDF period up to 2026?	Yes		No	
Is the site available now?	Yes		No	
If the site is not available now what is needed to make it available?				

When do you envisage the site becoming available for development?	0-5 years		6-10 years		11-15 years		+ 15 years	
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Signed: _____ **On Behalf of:** _____

Date: _____

OUTSTANDING COMMITMENT LETTER CONTENT

Insert Address

Tel No: 01732 227178
Ask for: David Bedford
Email: David.Bedford@sevenoaks.gov.uk
My Ref: Housing Update
Date: April 2010

Dear Sir/Madam,

SEVENOAKS DISTRICT COUNCIL – OUTSTANDING PLANNING PERMISSIONS (INSERT REF NO HERE) – (INSERT SITE ADDRESS)

I write with regards to the above mentioned site and outstanding/expired Planning Permission, for which I believe you are the Owner or Agent.

Sevenoaks District Council is in the process of preparing the Local Development Framework (LDF) for the District, of which one of the key components is planning for future housing requirements.

If implemented, the above mentioned Planning Permission will impact upon the District's Housing Supply of 3,300 dwellings over the period 2006-2026. We would therefore be grateful if you could please provide us with the following information;

- 1) Are you/your client still in control of this site?
- 2) If no; can you provide contact details for the current owners?
- 3) If yes; Do you/your client have a continued intention to develop this site?
- 4) If there is a continued intention to develop, can you please provide a broad timescale as to when the development is likely to commence?
- 5) Are there any serious constraints that may affect the delivery of this Planning Permission?

I would be grateful if you would please provide a short written response to these questions prior to **21 May 2010**. Responses can be sent directly to me by e-mail to David.Bedford@sevenoaks.gov.uk.

Alternatively postal responses can be sent to Mr D Bedford, Planning Policy, Council Offices, Argyle Road, Sevenoaks, Kent, TN13 1HG.

I look forward to receiving your comments. If you require further assistance, please do not hesitate to contact me on 01732 227134.

Yours sincerely

David Bedford
Planning Officer (Policy)

