

Housing land supply update

Analysis paper 1 April 2019

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1.0 Overview

The purpose of this paper is to: provide detail on the components that have contributed towards the Council's 5 years housing land supply at 1 April 2019; report on the Council's 20 year housing land supply progress; and to demonstrate the Council's performance against new national policy requirements including the housing delivery test.

Summary of the Council's Housing Land Supply 2018/19 include:

- The Council at 1 April 2019 can demonstrate 6.3 years' worth of deliverable housing sites against the Local Plan housing target of 17,660 dwellings;
- The 5 year housing land supply is made up of detailed planning consents 84%, Outline planning consents 10%, allocated sites with planning consent pending 2%, allocated site with no consent 1% and a small sites (1-4 units) windfall allowance of 3%;
- The 20 year supply position has also improved to a surplus of 1,378 dwellings measured against the housing target of 17,660 dwellings.
- There were 1,146 dwellings (net) completed during the monitoring year 2018/19, bringing the total completed dwellings for the Local Plan period to 6,437;
- There were 1,301 dwellings under construction at 1 April 2019, and this indicates that good progression will be expected on dwelling completions during 2019/20;
- In 2018/19 there was a nearly even split between completed dwellings on greenfield and brownfield; and,
- Maidstone's has a 135% result measured against the new housing delivery test.

2.0 Housing land supply

At 1 April 2019 The Council has a 20 years HLS of 19,038 dwellings, which exceeds the Local Plan housing target of 17,660 by 1,378 dwellings. This is a considerable improvement on the position published after the Local Plan inspector issued his 'Interim Findings from the Examination of the Maidstone Borough Local Plan' on 22 December 2016 (examination document reference ED110) of -85 dwellings. The improvement can be attributed to intensification of dwellings on sites allocated within the Local Plan, windfall planning permissions, and a revised windfall allowance that takes account of changes to national policy to include all sites not identified through the Local Plan, rather than just brownfield sites.

Good progress has been made by the Council towards meeting the 20 year housing delivery target, with 6,437 dwellings (36%) complete against the Local

Plan housing target. Table 2.1 and Figure 2.1 demonstrate the components that contribute towards the 20 year housing supply. Appendix 1 provides a list of the itemised sites that contribute to the 20 year supply, including their estimated phasing and delivery.

		Dwellings (net)	Dwellings (net)
1	Local Plan housing target		17,660
2	Completed dwellings 1 April 2011 to 31 March 2019	6,437	
3	Extant planning permissions as at 1 April 2019 (including a 5% non-implementation discount)	7,350	
4	Local Plan allocated sites (balance of Local Plan allocations not included in line 3 above)	1,132	
5	Local Plan broad locations for future housing development	2,337	
6	Windfall sites contribution	1,782	
7	Total housing land supply		19,038
8	Housing land supply surplus 2011/2031		1,378

Table 2.1 20 year housing land supply 1 April 2011 to 31 March 2031

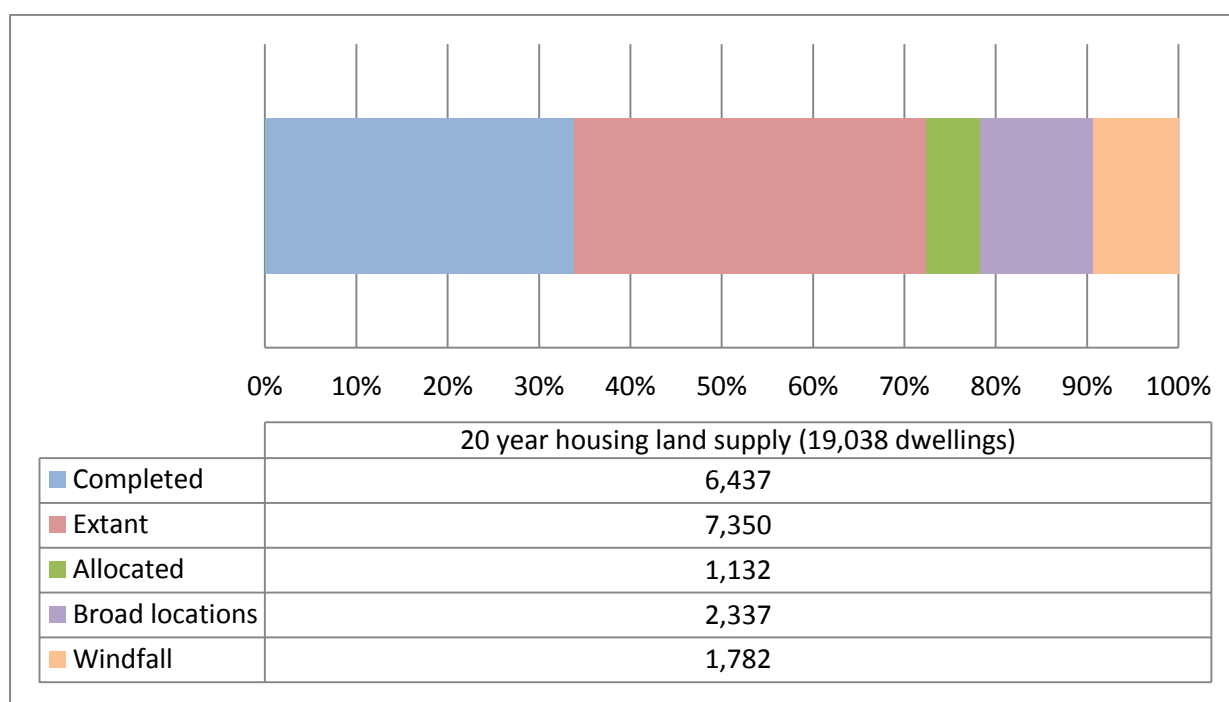


Figure 2.1 Supply components contributing to the 20 year supply at 1 April 2019

3.0 Completed dwellings

There were 1,146 dwellings (net) completed during the monitoring year 2018/19, bringing the total completed dwellings to 6,437 for the plan period. The sustained high delivery rate has helped the Council make excellent progress towards meeting its under supply from earlier years of the plan (Figure 3.1). Through the use of the 'Maidstone Hybrid' approach endorsed through the Local Plan 2017 examination, the remaining under supply of 627 dwellings will be split over the next 7 monitoring years.

Delivery of sites allocated within the Local Plan 2017, has led to an increase in the number of dwellings built on greenfield land, and 2018/19 saw an almost even split on completions between greenfield and brownfield (Figure 3.2).

Completions from built new dwellings were the most significant form of new homes within Maidstone during 2018/19. However, dwellings from conversions of existing buildings contributed to 39% of all completions (Figure 3.3).

Small sites (1 to 4 dwellings) continue to make a positive contribution to the Housing Land Supply and the local economy. There were 129 small sites that contributed 178 completed dwellings during the monitoring year 2018/19. During the Local Plan period small sites have contributed to 16% of all completions (Table 3.1). Appendix 2 lists the itemised sites that have contributed to the completed dwellings during the monitoring year 2018/19.

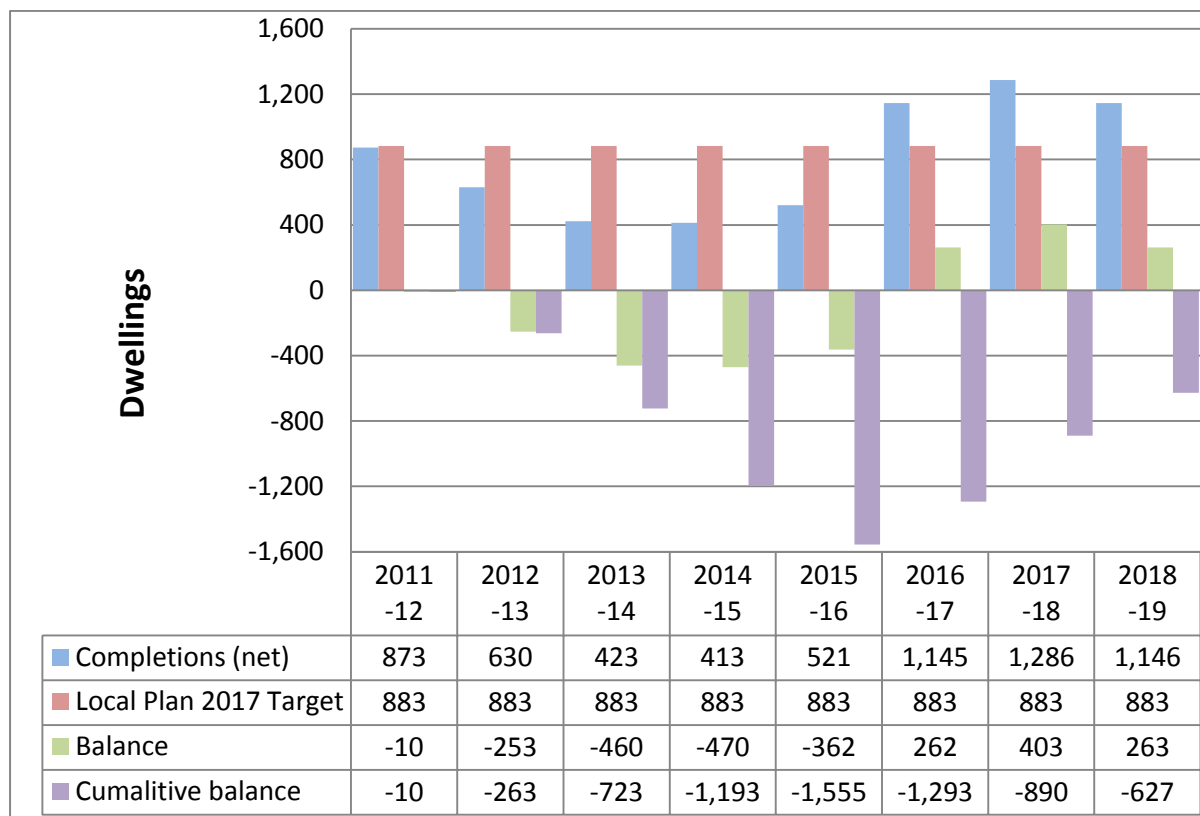


Figure 3.1 Completed dwellings 1 April 2011 to 31 March 2019

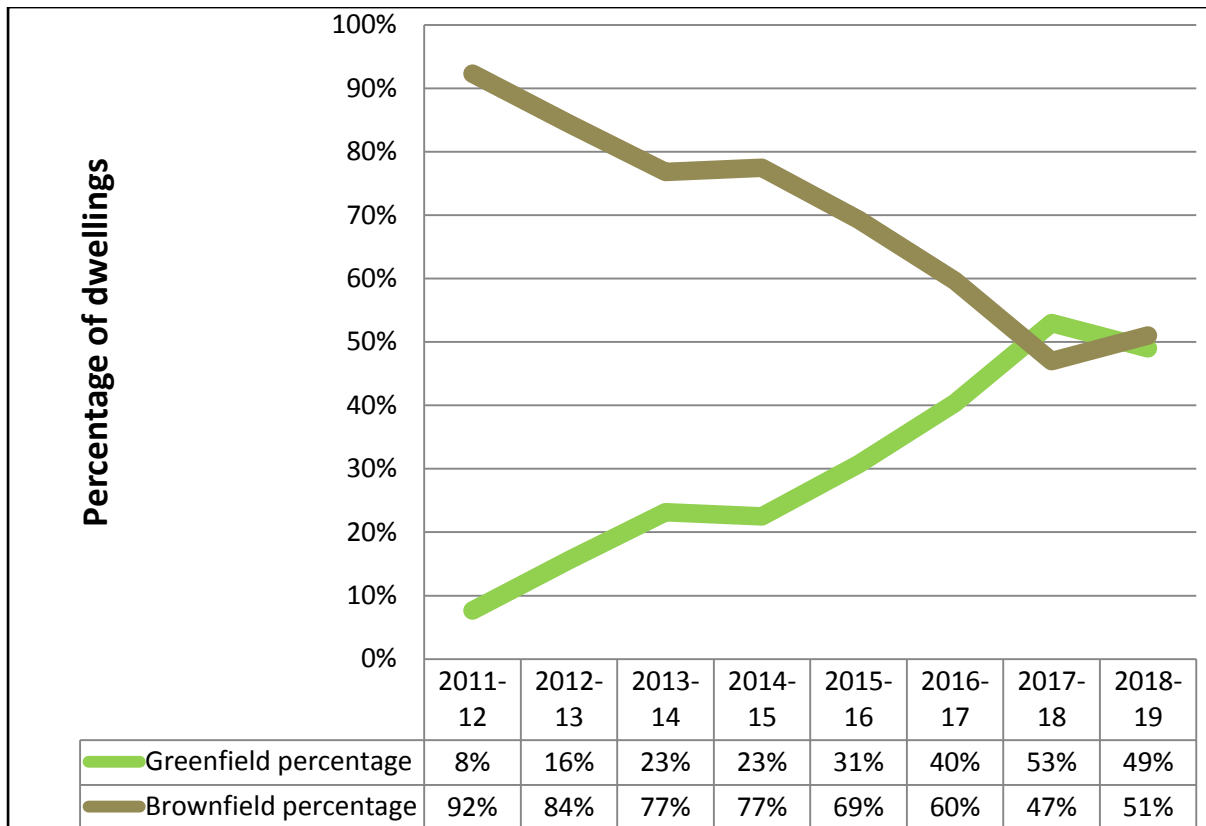


Figure 3.2 Percentage of greenfield/brownfield completions 1 April 2011 to 31 March 2019

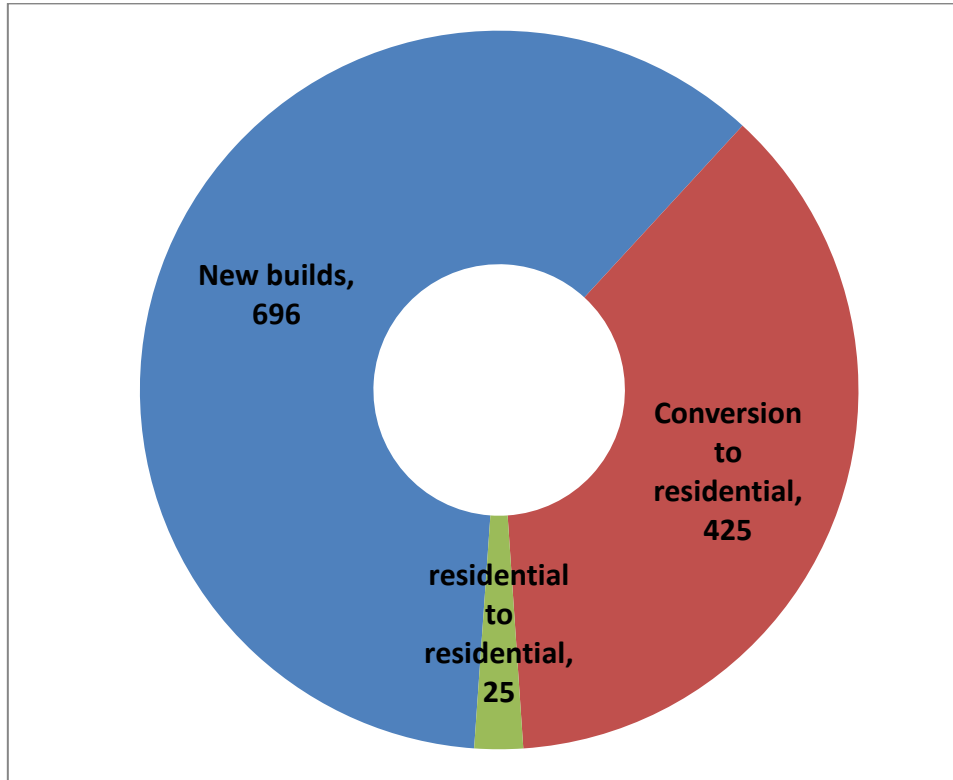


Figure 3.3 New dwellings by type of development 2018/19

	small sites	large sites	total	% small sites
2011/12	96	777	873	11%
2012/13	104	526	630	17%
2013/14	103	320	423	24%
2014/15	58	355	413	14%
2015/16	126	395	521	24%
2016/17	130	1,015	1,145	11%
2017/18	153	1,133	1,286	12%
2018/19	178	968	1,146	16%
Average	119	686	805	16%

Table 3.1 Small sites contribution to completed dwellings

4.0 Housing Delivery Test

The Council continues to perform extremely well against the Housing Delivery Test. The Councils completion performance over the last three years measured against the test is 135%, and this results in the application of a 5% buffer to its 5 years housing land supply calculation; a position that will be confirmed by MHCLG in November 2019 (Table 4.1). Figure 4.1 illustrates the significantly strong position of the Councils performance against the various penalties contained within the housing delivery test. Further, it is anticipated that completions taken from future years of the itemised housing land supply (Appendix 1) demonstrate that the Councils should perform even better against the housing delivery test in subsequent years (Figure 4.2).

	Completed dwellings	Local Plan 2017	Difference	Percentage of target
2016/17	1,145	883	262	
2017/18	1,286	883	403	
2018/19	1,146	883	263	
Total	3,577	2,649	928	135%

Table 4.1 Maidstone's performance against the HDT November 2019

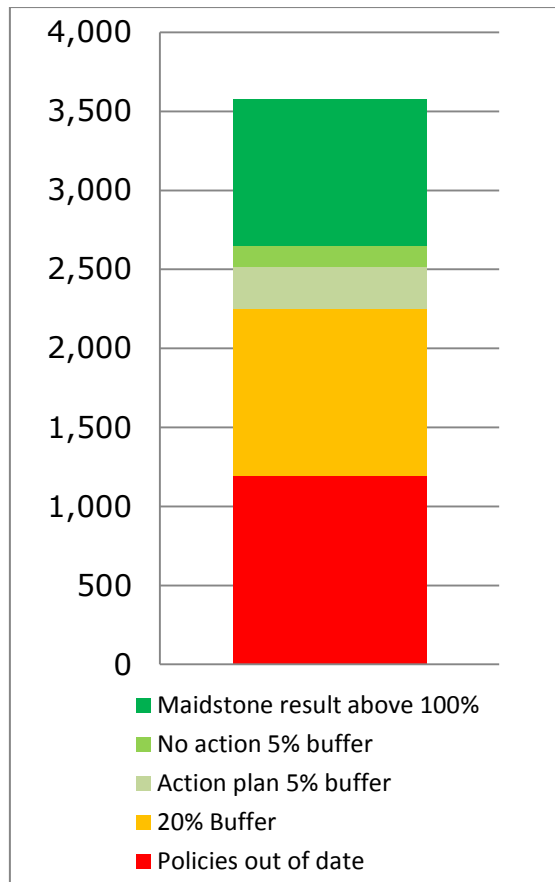


Figure 4.1 Maidstone's completed dwellings measured against HDT

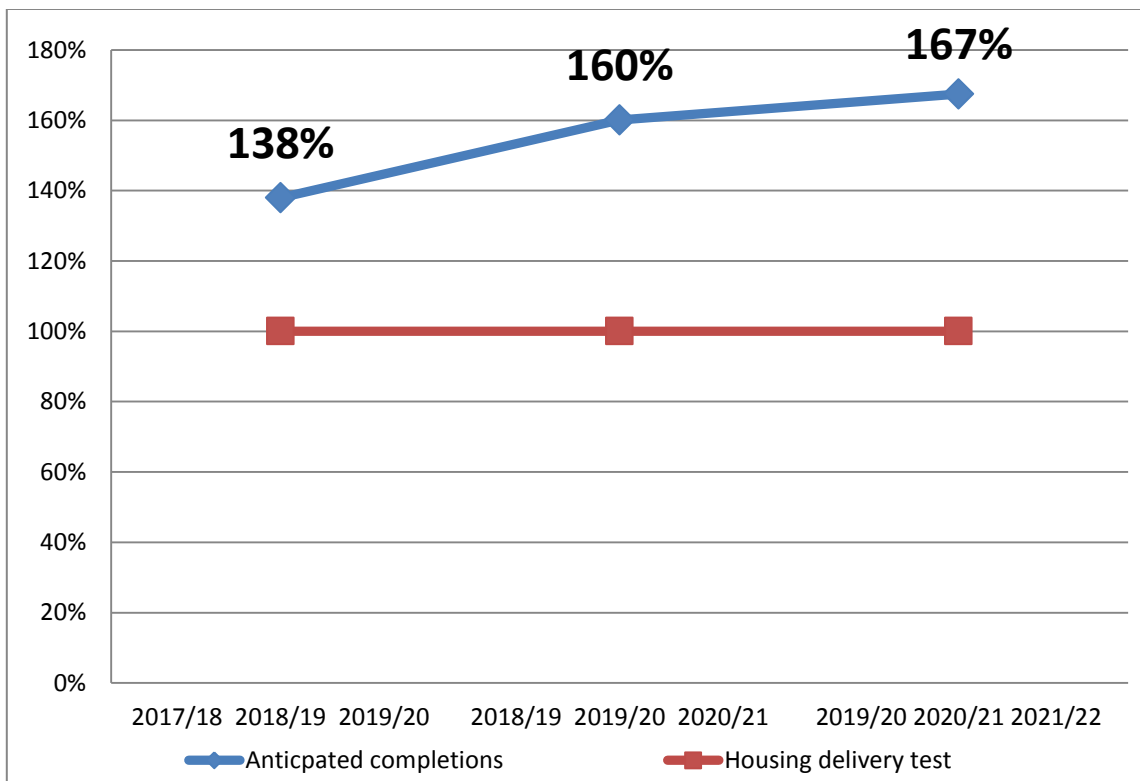


Figure 4.2 Maidstone anticipated future performance against the housing delivery test

5.0 Extant supply

The extant supply includes all current planning permissions that contribute towards the 20 year Housing land supply (Figure 5.1). The extant supply position is inclusive of a 5% non-implementation discount (Section 6.0).

There were 1,301 dwellings under construction at 1 April 2019, and this indicates that good progression will be expected towards dwelling completions during 2019/20.

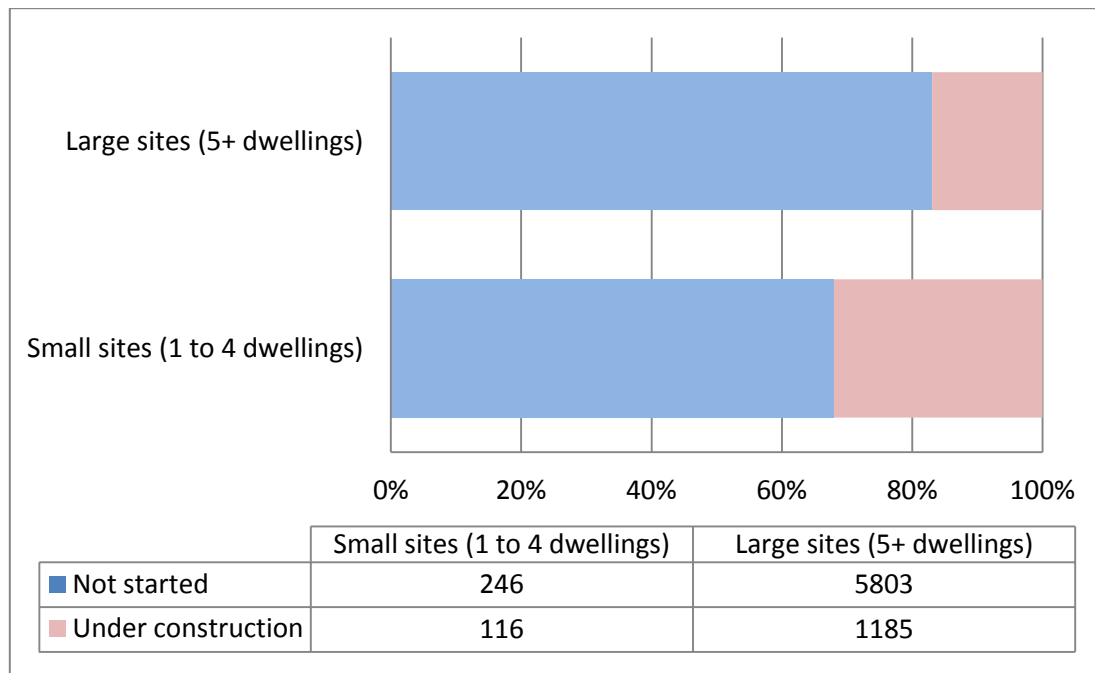


Figure 5.1 Extant sites not started/under construction at 1 April 2019

6.0 Non-implementation

The trend of a low expiry rate of planning permissions for new dwellings within Maidstone continues, and the average rate over the last 11 years has been 2.3%. The Council will continue to maintain its approach as endorsed through the Local Plan 2017 examination, of applying a 5% discount to the extant supply for the potential non-implementation over the next monitoring year. The 5% discount to extant planning permissions within the Council's housing land supply has proven to be a robust approach, and over the last three monitoring years has been in excess of actual expired permissions (Table 6.1).

Year	Dwellings (net)	Expired Dwellings (net)	% Expired Dwellings	Allowance Applied	Surplus / Deficit
2008-09	3,150	20	0.6%		
2009-10	3,514	127	3.6%		
2010-11	3,452	76	2.2%		
2011-12	2,987	53	1.8%		
2012-13	2,007	64	3.2%		
2013-14	2,116	66	3.1%		
2014-15	3,742	66	1.8%		
2015-16	5,605	89	1.6%		
2016-17	6,378	254	4.0%	288	34
2017-18	7,012	76	1.1%	307	231
2018-19	7,904	167	2.1%	347	180
Average	4,352	96	2.3%	314	148

Table 6.1 Expired planning permissions/non-implementation allowance

7.0 Progress of Local Plan housing allocations

Sites allocated within the Local Plan 2017 have continued to make excellent progress in gaining planning permissions. 22% of all dwellings on allocated sites have now been completed with a further 11% currently under construction. There now only remains 13% of the allocated dwellings to gain planning consent (Figure 7.1).

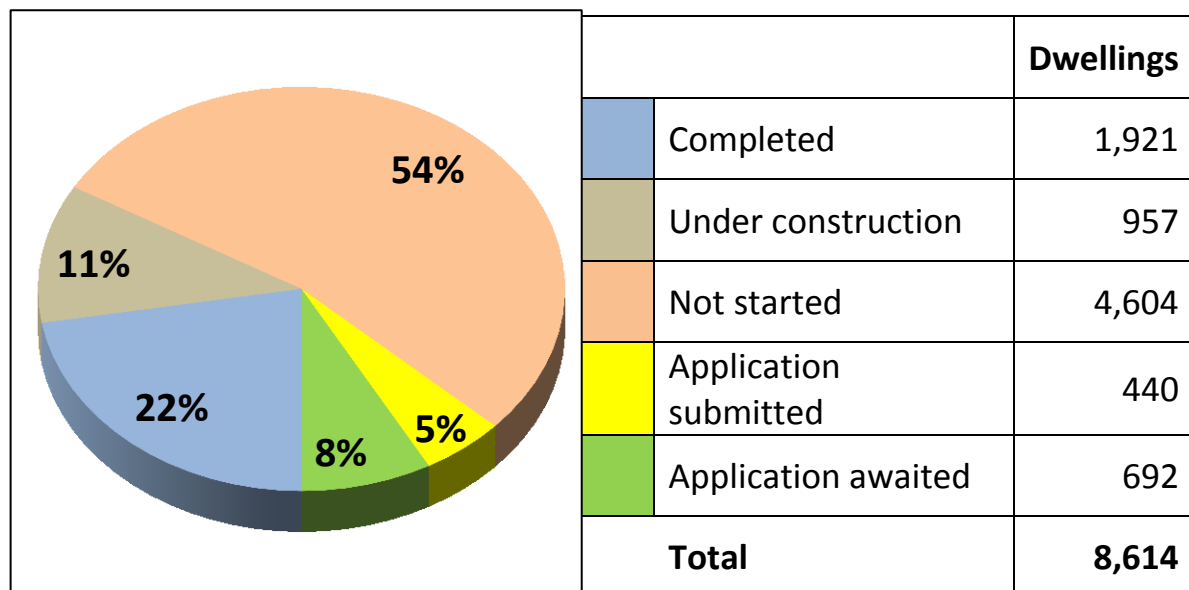


Figure 7.1 Progress of Local Plan 2017 allocated housing sites

8.0 Windfall sites contribution

The increase in completed dwellings since 2016/17, and national policy redefinition of a windfall site from previously developed site not identified through the local plan, to any site not identified has had a significant impact on the sites that contribute towards the windfall allowance. Table 8.1 illustrates that small sites now make a significant contribution to the windfall gains.

The resultant increase in completed windfall dwellings, has led to an increase in the small sites windfall contribution to 111 dwellings per annum. The contribution from the large sites windfall allowance has remained the same as the previous monitoring year, and is 87 dwellings per annum between the years 2024/25 to 2028/29 and 174 dwellings per annum between the years 2029/30 to 2030/31 (Appendix 1).

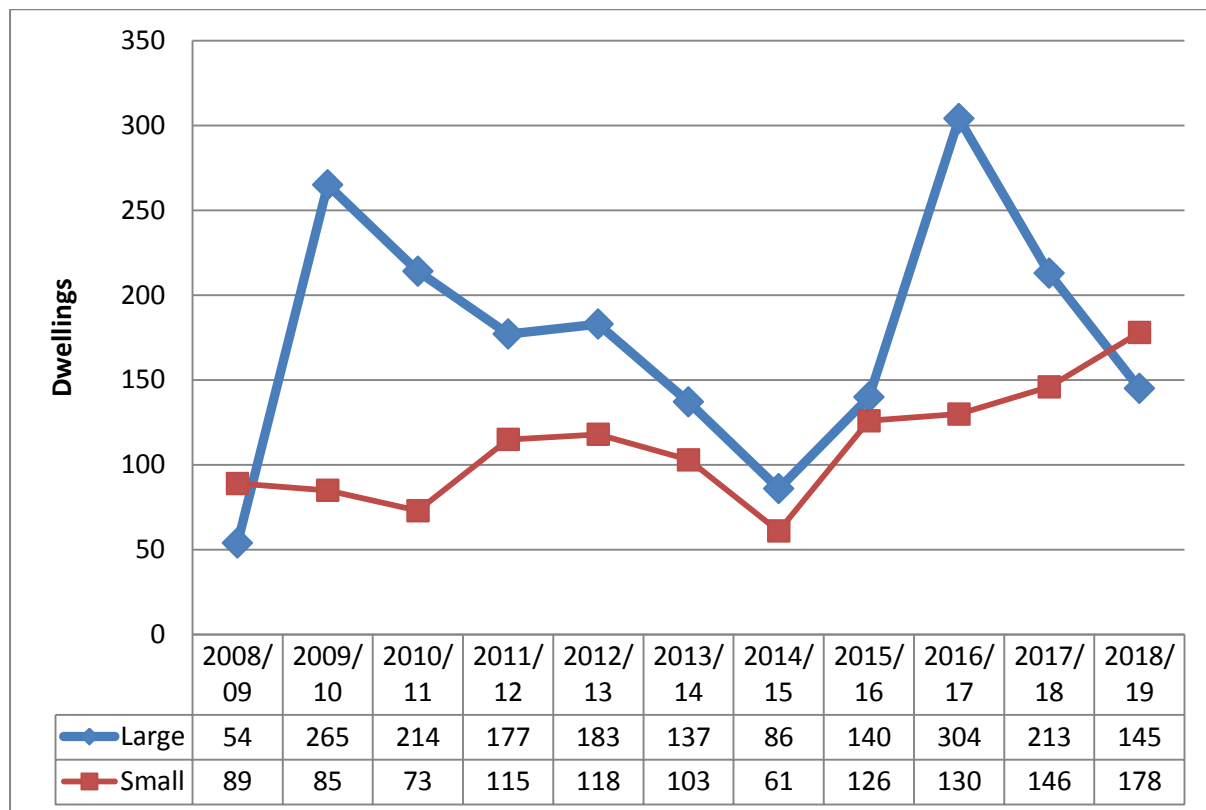


Table 8.1 Completed windfall dwellings (new NPPF definition)

9.0 Housing land supply forum

Following on from May 2017 and 2018, a further forum was held in May 2019 to help inform the housing land supply by reviewing: major sites with outline planning permission; sites allocated within the Local Plan 2017, that had yet to

gain planning permission; and, to review the progress of major (10+ dwelling) sites with detailed planning consent.

The forum consisted of officers from the Council, planning consultants and representatives from developers based in the local area. In advance of the forum, members were supplied with the major sites that contributed to the housing land supply, for the current monitoring year. Members were asked to give their opinion and site specific information where available on the phasing and delivery of the sites. This information was then discussed and reviewed against the 5 year supply methodology.

The housing land supply officer conclusions within Appendix 1 state where delivery of a major site has been amended from the 5 year supply methodology as a result of information supplied by developers and planning consultants and through discussion held by the forum.

10.0 5 Years housing land supply

The Council at 1 April 2019 can demonstrate 6.3 years' worth of deliverable housing sites against the Local Plan housing target of 17,660 dwellings for the Plan period (Table 10.1).

Progress of sites allocated within the Local Plan 2017 and windfall planning permissions with detailed consent contribute to 84% of the 5 year supply. Outline planning permissions on major sites (10+ dwellings) that have been evidenced through: engagement with the site developers and consultants; feedback obtained from Development Management and progress of detailed consents; reviewed by the housing land supply forum; and consistency checked with evidenced lead-in times and delivery rates, contribute 10% of the supply. A small allowance has been made for sites allocated within the Local Plan which do not have planning consent as a result of developer and planning consultant engagement, and review by the housing land supply forum (Figure 10.1).

All the minor sites and small sites (less than 10 dwellings) that contribute to the 5 year supply, have been calculated using the endorsed methodology by the Local Plan inspector policy (Chapter 11).

	5 - year housing land supply - 'Maidstone Hybrid' method	Dwellings (net)	Dwellings (net)
1	Objectively Assessed Need (OAN) 2011 - 2031	17,660	
2	Annual need 17,660/20 years	883	
3	Delivery target 01.04.11 to 31.03.19 (883 x 8 years)	7,064	
4	Minus completed dwellings 01.04.11 to 31.03.19	6,437	
5	Shortfall against target 01.04.11 to 31.03.19	627	
6	Annual delivery of shortfall 627/7 years (Maidstone Hybrid)	90	
7	Five-year delivery target 01.04.19 to 31.03.24 (883x5)	4,415	
8	Plus shortfall against OAN 90x5 years	450	
9	5% buffer (Housing Delivery Test @ November 2018 112%)	243	
10	Total five year housing land target at 01.04.19		5,108
11	Five-year land supply at 01.04.19		6,469
12	Surplus		1,361
13	No. years' worth of housing land supply (5,108/5 = 1,022; 6,469/1,022 = 6.3)		6.3

Table 10.1 5 year housing land supply 1 April 2018

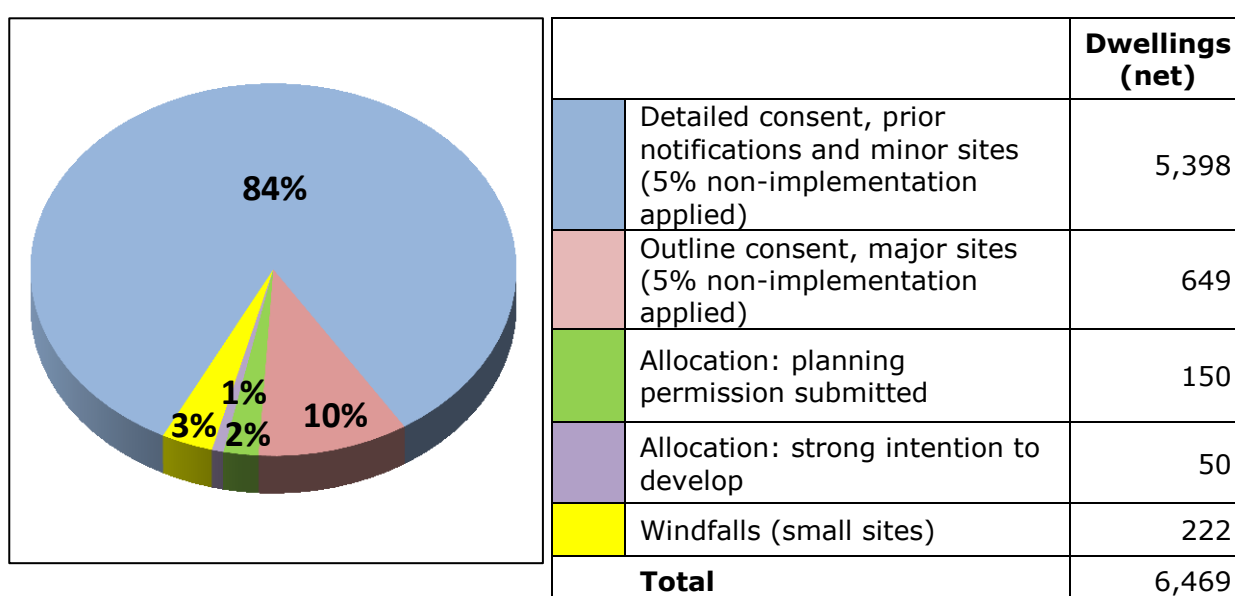


Figure 10.1 Components of the 5 year housing land supply

11.0 5 year supply methodology (as amended by NPPF 2019)

Changes to delivery evidence for major sites (10+ dwellings) with outline planning consent, planning permission in principle or allocated within a plan without consent came into effect through the NPPF 2019. Annex 2 of the NPPF 2019 states the evidence requirement for these sites.

“For sites [*MAJOR DEVELOPMENTS 10 OR MORE DWELLINGS*] with outline planning permission, permission in principle, allocated in a development plan or identified on a brownfield register, where clear evidence is required to demonstrate that housing completions will begin on site within 5 years, this evidence may include:

- any progress being made towards the submission of an application;
- any progress with site assessment work; and,
- any relevant information about site viability, ownership constraints or infrastructure”

The Council presented a base line phasing methodology for its housing land supply as part of its Local Plan examination (Figure 11.1), The phasing of Large (5+ dwellings) sites was amended from the base line where appropriate based on feedback from developers/site promoters and development management and then delivery rates were set, informed where possible by site developers and promoters.

The requirement to provide delivery evidence on major sites with outline consent, planning permission in principle and allocated within a plan without planning consent has required this methodology to be amended for sites that fall into those categories. Further, to provide consistency on the setting of delivery rates for sites, historical evidence has been produced. At present the Council does not have any sites with planning permission in principle, for major sites with outline permission evidence was gathered by:

- Engagement with site developers/consultants;
- Progress towards gaining detailed planning consent reviewed;
- Feedback obtained from the Councils Development Management team;
- Review by housing land supply forum;
- Consistency check with Local Plan endorsed phasing methodology, and evidenced lead-in times and delivery rates.

Two allocated sites without planning permission were included within the 5 years supply as a result of engagement with the site promoters and review by the housing land supply forum. In Appendix 1 there is a column titled housing land supply officer conclusion which states how sites have been phased and their delivery rates set.

Lead-in times have been identified on the large sites (5+ dwelling sites) that have reported completions from building control completion reports. The lead-in time is taken from the date that the planning permission was granted to the date of the first completion certificate issued. It should be noted that some sites use approved inspectors to carry out building control and some of those inspectors have failed to notify the Council of site completions. This failure to carry out a statute duty, results in an incomplete picture for lead-in times. However, from the results that could be gathered, the lead-in time evidence indicates that the assumptions presented as part of the Local Plan examination were robust and accurate (Table 11.1). An action from the housing land supply forum for next year is to expand on the lead-in evidence for sites above 50 dwellings to evidence, 50 to 99 dwellings, 100 to 249 dwellings and 250 to 800 dwellings.

Delivery rates for large sites have also been analysed since the Local Plan was submitted for examination, and this analysis now provides the base line methodology for estimating delivery rates on large sites (Table 11.2). Another action from the housing land supply forum for next year is to expand on the delivery evidence for sites above 50 dwellings to evidence, 50 to 99 dwellings, 100 to 249 dwellings and 250 to 800 dwellings.

As additional years of housing land supply are monitored, both the lead-in time and delivery rate evidence bases will continue to be expanded upon. As the Local Plan review progresses, there may also be the need to develop other evidence bases and assumptions.

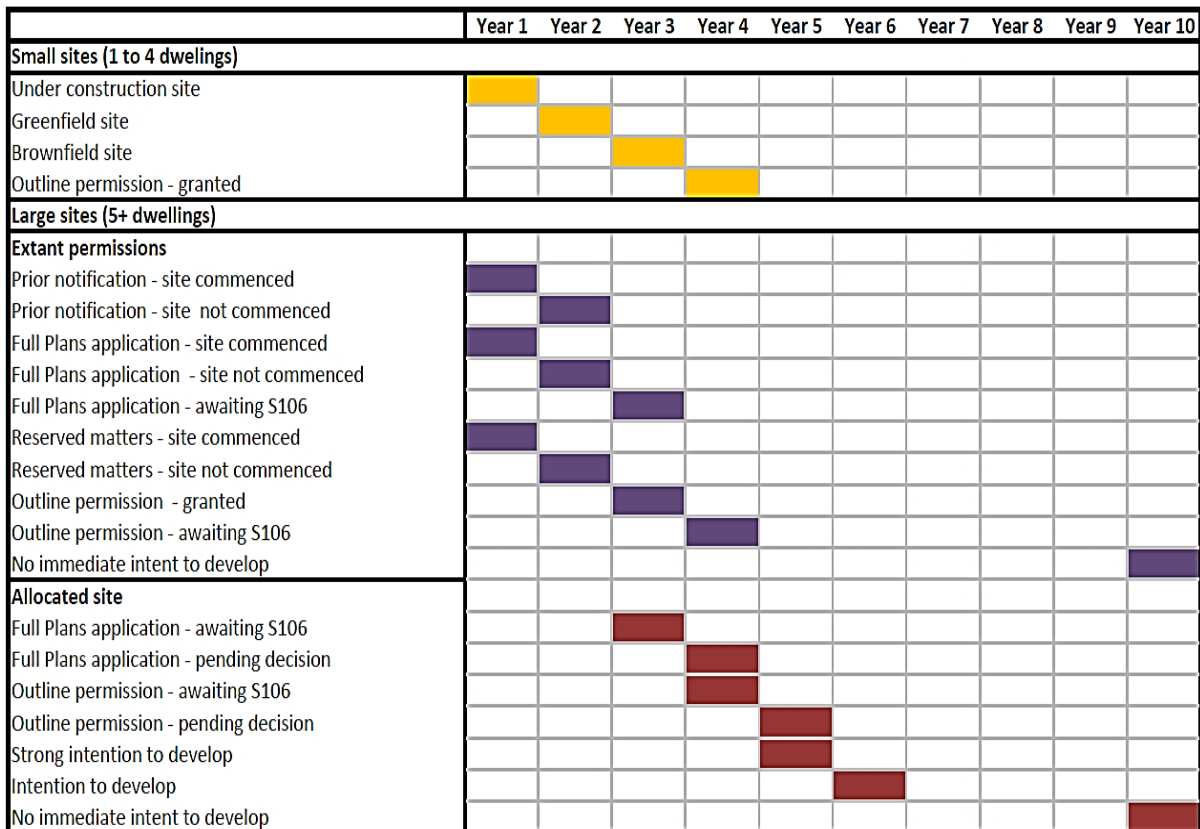


Figure 11.1 Phasing methodology

	Outline	Full Plans	Prior Notification
2016/17	730	695	494
2017/18	908	647	546
2018/19	1,260	601	673
Average days	966	647	571
Average years	2.6	1.8	1.6

Table 11.1 Average lead-in time 5+ dwelling sites

Site size	5 to 24	25 to 49	50+
2016/17	8	10	61
2017/18	9	22	55
2018/19	6	20	44
Average	8	17	53

Table 11.2 Average delivery rates on large 5+ dwelling sites

12.0 Conclusion

Monitoring of the Council’s housing land supply continues to maintain the robust evidence gathering and analysis methodology that was established during the Maidstone Local Plan 2017 examination. Additional housing land supply evidence gathering has been carried out to test this methodology against new national policy requirements, and this work confirms the accuracy of the

assumptions made within the methodology. The Council continues to engage with site developers/promoters to help inform its supply position and to obtain as true a picture as possible on site delivery.

The Council maintains a strong 5 year housing land supply position, with 6.3 years' worth of supply at 1 April 2019. The five year supply is vastly made up of extant planning permissions of which 84% has detailed consent. The large number of units under construction indicates that the next monitoring years completed dwellings will again surpass the Local Plan target of 883 dwellings and will further reduce the Council's under supply from the early years of the plan period.

The Council has performed exceptionally well against the first year of the housing delivery test, and the results expected in November 2019 should be even stronger at 135%. The Council has evidenced the deliverability of sites with outline permissions through: engagement with site developers/planning consultants and development management officers; monitoring of the progress towards gaining detailed consents; reviewing phasing and delivery assumptions within a housing land supply forum; and, benchmarking lead in times and delivery rates. This approach has allowed the Council to examine its housing land supply robustly and the procedures carried out exceed those set out within the NPPF 2019.

The 20 year housing land supply position has continued to strengthen during the last monitoring year to a surplus of 1,378 dwellings and the under supply of completed dwellings from the early years of the Local Plan has been significantly reduced. Housing sites allocated within the Local Plan continue to make good progress towards being built, the continued progress of windfall planning permissions and the transition of the Town Centre and Lenham broad locations to sites with planning consent should also enable the Council to meet the objectives of the Local Plan

To date, excellent progress has been made towards meeting the Council's housing targets within the Local Plan 2017. And, the monitoring and analysis carried out by the Strategic Planning Team indicates that this progress will continue in the subsequent years to come. The Council's housing land supply will continue to be monitored on a yearly basis and a further updated position to the 5 and 20 year supply will be provided at a base date of the 1 April 2020.