

<b>Full Council</b>	
<b>Meeting Date</b>	29 January 2025
<b>Report Title</b>	<b>Local Plan Review – Housing Historic Delivery &amp; Local Plan Review Housing Target</b>
<b>EMT Lead</b>	Emma Wiggins, Director of Regeneration and Neighbourhoods
<b>SMT Lead</b>	Joanne Johnson, Head of Place
<b>Lead Officer</b>	Stuart Watson, Project Manager (Planning Policy)
<b>Classification</b>	<b>Open</b>
<b>Recommendations</b>	<ol style="list-style-type: none"> <li>1. That Full Council consider the approach to setting a Local Plan housing target, as set out in paragraphs 3.1 and 3.2 of the Planning and Transportation Policy Working Group (PTPWG) report on Housing Historic Delivery and Local Plan Review Housing Targets, including the 5% buffer for consultation and examination resilience.</li>   <li>2. That Full Council considers the proposed growth within the draft Plan Regulation 18 consultation of 7,990 dwellings, including the review of the remaining Local Plan Bearing Fruits (1,703 dwellings), as well as the balance of housing need (6,287 dwellings). Delegation be given to Head of Place to amend figures, with the Policy and Resources Committee Chair and Vice-Chair, solely in line with any additional planning permissions granted, new dwellings completed, annual changes in government published statistics and any evidence which concludes previously granted or allocated sites are no longer deliverable.</li> </ol>

## **1 Purpose of Report and Executive Summary**

- 1.1 The purpose of this report is to ask Full Council to agree the proposed housing target approach as reported to the Policy and Resources committee (P&R) on 27<sup>th</sup> November 2024. The P&R report is provided in Appendix I.
  
- 1.2 It should be noted that the figures in recommendation 2 will fluctuate over time as the Local Housing Need that informs the starting point for the local housing target is updated annually by Government statistics or through changes to National Policy. The figures will also need to be updated as additional planning permissions are granted, new dwellings are completed, and new information comes forward on

sites which demonstrates them to no longer be deliverable. Finally, there also maybe be the need to amend the figures as the Local Plan moves forward and detailed evidence is developed to investigate if there any hard constraints to meeting the Local Housing Need.

## 2 Background

- 2.1 A report on the Council's historic housing delivery and proposed housing target approach was taken to PTPWG on the 8<sup>th</sup> August and that report provides detail on these issues and is provided in Appendix II.
- 2.2 There was discussion at P&R on the 27<sup>th</sup> November 2024 that amongst other matters included the possibility of a reduced housing target for the Council as identified from the findings of the Housing Targets Exceptional Circumstances Study (Appendix III).
- 2.3 The Housing Targets Exceptional Circumstances Study was produced for the Council in response to changes to the National Planning Policy Framework (NPPF) in December 2023 which stated nationally set housing targets were advisory, rather than mandatory and could be departed from where 'exceptional circumstances' could be evidenced. The study addresses two distinct elements to help inform whether there is a case for a lower housing target. They are:
  - **Housing need** – whether exceptional circumstances exist to justify calculating need using a methodology other than the Governments imposed standard method,
  - **Housing requirement** – whether there are wider factors (essentially constraints / opportunities, unmet need issues and supply options) exist to justify adopting a housing requirement below the housing need.
- 2.4 The Study found that there was not exceptional circumstances to depart from the Government's imposed standard method of calculation but there might be the possibility through the housing requirement. This means the starting point for determining the housing target for the Local Plan is the use of the Government's imposed standard method of calculation. The output of the calculation is known as Local Housing Need.
- 2.5 The Local Housing Need for Swale for the monitoring year 2024/25 was 1,040 dwellings per annum under the NPPF December 2023 version. The Government in its July 2024 consultation for the National Planning Policy Framework proposed amending the standard method for calculating Local Housing Need.
- 2.6 The July 2024 consultation proposed amendments to the Standard method calculation that included changing the Governments statistics from household growth projections to an existing house stock base starting point and use of a 3 year average on affordability of new dwellings. If those changes were to have been adopted it would change have changed the Councils Local Housing Need for this

monitoring year to 1,061 dwellings. In December 2024 the Government published its latest version of the NPPF that included minor changes to the standard method as proposed in July 2024, that includes increasing the historical period of housing affordability consideration from 3 years to 5 years and an adjustment to the mathematical formula. Under the NPPF December 2024 the Councils Local Housing Need has now changed to 1,048 dwellings and increase of 8 dwellings on the approach set out in the NPPF December 2023.

- 2.7 Since P&R committee on the 27<sup>th</sup> November 2024, the latest version of the NPPF was published in December 2024 providing certainty to the Governments imposed standard method of calculating Local Housing Need. The new standard method is different to that proposed in July 2024 and has resulted in a lower housing need for Swale than anticipated. This means that the extra 336 dwellings that were added to the Local Plan Housing target for potential NPPF changes to the standard method in the P&R proposals can now be removed.
- 2.8 The approach to setting a Local Plan housing target, as set out in paragraphs 3.1 and 3.2 of the PTPWG report on Housing Historic Delivery and Local Plan Review Housing Targets, includes a 5% buffer to the target. One of the purposes of the buffer is to ensure that there is resilience to the Council's approach removing the need to review the figures in detail when there are minor fluctuations as is the case in the Local Housing Need calculation as set out above in paragraph 2.6 of this report.
- 2.9 As the Local Plan drafting progresses through evidence development and consultation, there may become identified planning reasons that set out hard constraints to strategic development that may result in a lower housing requirement for the Plan period. At that point it would then be appropriate to amend in detail the Councils Local Plan housing target.

### **3 Proposals**

3.1 On 27<sup>th</sup> November 2024, P&R resolved:

1. That Full Council considers the Local Plan housing target, as set out in paragraphs 3.1 and 3.2 of the PTPWG report on Housing Historic Delivery and Local Plan Review Housing Targets, including the 5% buffer for consultation and examination resilience, and along with the extra 336 dwellings set out in the current NPPF consultation be taken forward for consultation in the Local Plan Review Regulation 18.
2. That Full Council considers the proposed growth within the draft Plan Regulation 18 consultation of 8,326 dwellings, including the review of the remaining Local Plan Bearing Fruits (1,703 dwellings), as well as the balance of housing need (6,287 dwellings), and additional units to allow for the proposed new NPPF housing target (336 dwellings) be taken forward for consultation in the Local Plan Review Regulation 18, and delegation be given to Head of Place

to amend figures, with the Committee Chair and Vice-Chair, solely in line with additional planning permissions granted, new dwellings completed and any evidence which concludes previously granted or allocated sites are no longer deliverable.

3.2 Since P&R committee the latest version of the NPPF was published in December 2024 providing certainty to the Governments imposed standard method of calculating Local Housing Need. This means that the extra 336 dwellings that were added to the Local Plan Housing target for potential NPPF changes can now be removed. As a result, the proposals to Full Council can be amended to:

1. That Full Council consider the approach to setting a Local Plan housing target, as set out in paragraphs 3.1 and 3.2 of the PTPWG report on Housing Historic Delivery and Local Plan Review Housing Targets, including the 5% buffer for consultation and examination resilience.
2. That Full Council considers the proposed growth within the draft Plan Regulation 18 consultation of 7,990 dwellings, including the review of the remaining Local Plan Bearing Fruits (1,703 dwellings), as well as the balance of housing need (6,287 dwellings), and that delegation be given to Head of Place to amend figures, with the Policy and Resources Committee Chair and Vice-Chair, solely in line with any additional planning permissions granted, new dwellings completed, annual changes in government published statistics and any evidence which concludes previously granted or allocated sites are no longer deliverable.

#### **4 Alternative Options Considered and Rejected**

- 4.1 No alternatives are put forward with regard to historic housing delivery, as that is a presentation of factual, historic information.
- 4.2 Officers outlined in the PTPWG report that there are limited options for alternative housing targets. Pursuing a lower housing target is unlikely to result in a Local Plan proceeding successfully through examination. The Housing Targets Exceptional Circumstances Study discussed at P&R has some limited windows open for reducing the housing target. However, at this stage of Local Plan preparation the Council must use the Local Housing Need figure as determined by the Governments imposed standard method as the starting point, and then gather evidence to see if those windows open.

#### **5 Consultation Undertaken or Proposed**

- 5.1 Consultation is proposed for the Local Plan Regulation 18 to take place from October 2025, which would include the Local Plan housing target approach as discussed if the recommendations in this report are taken forward.

## 6 Implications

<b>Issue</b>	<b>Implications</b>
Corporate Plan	The Local Plan is responsible for delivering the spatial elements of the Corporate Plan.
Financial, Resource and Property	This paper has no specific financial or resource implications.
Legal, Statutory and Procurement	Preparation of a Local Plan is carried out under a national legislative and regulatory framework.
Crime and Disorder	None identified at this stage.
Environment and Climate/Ecological Emergency	The Local Plan will be supported by its own Sustainability Appraisal and Habitats Regulation Assessment at each key stage in decision making.
Health and Wellbeing	None identified at this stage
Safeguarding of Children, Young People and Vulnerable Adults	None identified at this stage.
Risk Management and Health and Safety	None identified at this stage.
Equality and Diversity	None identified at this stage.
Privacy and Data Protection	None identified at this stage.

## 7 Appendices

- 7.1 Appendix I P&R report LPR Housing Historic Delivery LPR Housing Targets.
- 7.2 Appendix II Local Plan Review Housing historic delivery and housing target report PTPWG 8th August 2024
- 7.3 Appendix III Housing Targets Exceptional Circumstances Study

## 8 Background Papers

- 8.1 Planning and Transportation Policy Working Group 8<sup>th</sup> August 2024 minutes link:  
[PTPWG 8th August 2024 printed draft minutes](#)
  
- 8.2 Policy and Resources Committee 27<sup>th</sup> November 2024 minutes link:  
[P&R 27th November 2024 printed draft minutes](#)

