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1. Introduction

What is the Strategic Housing Land Availability Assessment (SHLAA)?

The SHLAA serves to provide information on a source of sites, some of which will provide a supply of land (through a portfolio of sites) to support the delivery of sufficient land for housing, that is required to meet the housing need for the Borough. The SHLAA is the key piece of evidence to inform choices of sites to consider for site allocations although the assessment of sites is made irrespective of the level of housing provision that is needed (i.e. there are more sites in the SHLAA than the required housing provision). There is a commitment for an Independent panel to review issues regarding the methodology and its interpretation (should this be required) this has not been deemed necessary this year as no concerns have arisen.

The purpose of the SHLAA

The National Planning Policy Framework (NPPF) states that local authorities should positively seek opportunities to meet the development needs of their area, as set out in their local plan (the Broxtowe Borough Aligned Core Strategy) over a period of at least 15 years. In doing so they should annually prepare a SHLAA which acts as a technical evidence-base for the identification of 'deliverable' and 'developable' sites by establishing realistic assumptions about the availability, suitability and the likely economic viability of land to meet the identified need for housing over the plan period. Sites that are deliverable are expected to provide housing in the first five years of the plan period but have ownership, viability or other constraints that makes delivery unlikely to occur until after 5 years.

The primary role of the SHLAA is to:

- Identify sites with potential for housing;
- · Assess their housing potential; and
- Assess when they are likely to be developed.

The housing need has been identified (up until 2028) in the Broxtowe Borough Aligned Core Strategy which was adopted by Full Council on the 17th September 2014.

The inclusion of any site in the SHLAA does not guarantee that either planning permission will be granted or that the site will be allocated for residential development.

Assessments are based on information which has been submitted to the Council and are carried out by planning officers based on available information which is less detailed that that required to support a planning application. If you consider any of this information to be incorrect, out of date or if you have further information, please let us know and we will take any fresh information into consideration for the next SHLAA review. The SHLAA will normally be reviewed on an annual basis and sites can be nominated for inclusion at any time. The Council is unlikely to make allocations of sites of less than 10 dwellings; however there is no limitation on the size of the site.

There are two key reports that are used to support some of the assumptions made in this SHLAA, these are;

- G L Hearn <u>Greater Nottingham Housing Market & Economic Prospects (2012)</u> which looked at the timing and distribution of housing delivery in the housing trajectories of Broxtowe, Gedling and Nottingham
- Three Dragons <u>Broxtowe Borough Council Nottingham Core Affordable Housing Viability Assessment Final Report</u> which defines different housing sub markets in Broxtowe with

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¹ The National Planning Policy Framework (Communities and Local Government, 2012)

Beeston being the strongest, followed by Kimberley, then Stapleford with Eastwood identified as the weakest housing sub market.

2. Planning Policy Context

National Planning Policy

Whilst the NPPF replaced the Planning Policy Statement 3: Housing (PPS3) it maintains the requirement for local authorities to produce a SHLAA. The SHLAA needs to identify a supply of specific deliverable sites that are ready for development and sufficient to provide for their housing requirement for the first five years of the plan with an additional buffer of 5% or 20%² (to ensure choice and competition in the market for land), and to keep this topped up over time in response to market information. They are also required to identify specific developable sites or broad locations for growth, for 6-10 years and, where possible, for 11-15 years.

The NPPF defines 'deliverable' and 'developable' as shown below and introduces 'viability' as a key component of the assessment on whether and when sites are likely to be developed;

- Deliverable = a site is available now, offers a suitable location for housing development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years (from the date of the adoption of the plan) and in particular that the development of the site is viable.
- Developable = a site should be in a suitable location for housing development, and there should be a reasonable prospect that the site is available for, and could be viably developed at the point envisaged.

Local Planning Policy

The Broxtowe Borough Aligned Core Strategy sets out the housing requirement and other principles guiding the location of development in the Borough between 2011 and 2028. This carries forward the level of housing provision set out in the East Midlands Regional Plan taking full account of under provision against the Regional Plan targets between 2006 and 2013 and represents the Broxtowe share of the full objectively assessed housing need for the Housing Market Area (HMA) as a whole. See page 34 of this SHLAA report for further details of the joint working within the HMA. Important evidence which informed the ACS includes an Economic Prospects report from GL Hearn (Greater Nottingham Housing Market & Economic Prospects Report) which concludes that the recovery from the housing market difficulties during recession is likely to be gradual and that the trajectories in the Core Strategies are challenging but achievable, and that by Three Dragons which identifies Beeston as the strongest housing submarket in Broxtowe followed by Kimberley, then Stapleford, and finally Eastwood.

Housing Distribution

Policy 2 of the Core Strategy details housing provision in Broxtowe with a total requirement of 6150 new homes over the plan period of 2011 to 2028 and sets out the housing distribution located in or adjoining the key settlements as shown in Table 1 below:

Table 1: Housing Distribution

Settlement	Dwelling Numbers
Awsworth	Up to 350 homes
Brinsley	Up to 150 homes
Eastwood	Up to 1,250 homes
Kimberley	Up to 600 homes
Main Built up Area	At least 3800

² For more information see section 7 of this report.

3. The SHLAA process

Nottingham Core SHLAA

The Nottingham Core Councils have worked in partnership to produce a SHLAA methodology³ to guide a consistent approach to assessing sites through the SHLAA process across the Nottingham Core Housing market Area (HMA). This section summarises the approach Broxtowe Borough Council has taken to the SHLAA assessment, a more detailed examination of the way that the assessment was carried out can be found in the Nottinghamshire Core SHLAA methodology.

Information Sources:

Physical site surveys, historic data, the use of Geographic Information Systems (GIS) mapping data, aerial photographs and information on planning applications and enquiries coupled with information offered with the SHLAA submission and responses from other stakeholders are sources of information used for the assessment of each site.

Site identification:

Many sites within land adjacent to the Main Built-up Area of Nottingham (MBA)⁴ and Sub-Regional Centre were originally identified through EKOS ARUP⁵. In addition a formal 'call for sites' was undertaken in October 2007 and March 2012. These both involved advertisements a mail out to all developers, agents and landowners with an interest in promoting sites for housing or who have been historically active in the HMA and in March 2012 included all those on the Councils LDF database.

Land owners and developers of sites that are considered to be able to provide more than 5 dwellings (where a planning application is not extant) have been contacted regarding the deliverability of the site and the returning information has been collated in order to inform the assessment. Continued monitoring of residential applications, enquiries and information collected through on-going discussions with developers and stakeholders was used to create the assessment. There has not been a mail out to all developers and landowners this year due to this being done in the run up to the Core Strategy hearing sessions, and the up to date evidence of site delivery debated at very great length as part of these hearing sessions in October and November 2013 and February 2014.

Sites identified through the SHLAA process will remain in the database even if they are no longer considered to be suitable for housing development; this will be reflected in the delivery timescale.

Assessing suitability for housing;

When assessing a site's suitability for housing the following factors will be considered:

- Physical Restrictions such as designations, protected areas, existing planning policy;
- Physical problems or limitations such as access, infrastructure, ground conditions, flood risk, hazardous risk, pollution or contamination;
- Potential impacts including effect upon landscape features and conservation; and
- Environmental conditions which would be experienced by prospective residents.

³ Nottingham Core Housing Market Area – Strategic Housing Land Availability Assessment: Methodology (Ashfield District Council, Broxtowe Borough Council, Erewash Borough Council, Gedling Borough Council, Nottingham City Council, Nottinghamshire County Council, Rushcliffe Borough Council, July 2008)

⁴ Previously referred to as the Principal Urban Area (PUA).

⁵ Nottingham Principal Urban Area SHLAA, EKOS Consulting and ARUP, April 2007

Assessing availability for housing;

A site is considered available for development, when there is confidence that there are no legal or ownership problems, such as multiple ownerships, ransom strips, tenancy or operational requirements of landowners. Where problems have been identified, then an assessment has been made as to how and when they can realistically be overcome.

Assessing achievability/ viability for housing:

When assessing the achievability of a site for housing the following factors will be considered:

- Market factors such as adjacent uses, economic viability of existing, proposed and alternative uses in terms of land values, attractiveness of the locality, level of potential market demand and projected rate of sales (particularly larger sites);
- Cost factors including site preparation costs relating to any physical constraints, any
 exceptional works necessary, relevant planning standards or obligations, prospect of
 funding or investment to address identified constraints or assist development; and
- Delivery factors including the developers own phasing, the realistic build-out rates on larger sites (including the likely earliest and latest start and completion dates), whether there is a single developer or several developers offering different housing products, and the size and capacity of the developer.

Overcoming constraints

Where constraints have been identified, the assessment has considered the action that would be required to remove them, for example the need for investment in new infrastructure, dealing with fragmented land ownership, environmental improvement, or a need to amend planning policy which is currently constraining housing development. Where it is considered that the constraints cannot be addressed within the plan period or where the sites are not suitable or available for residential development they have been assessed as 'Not Deliverable or Developable'.

Small site assessment

For sites of less than 10 dwellings a desk based assessment has been carried out as to the likelihood of its development for housing. Small sites have come forward as a result of planning applications or enquiries and as such the details provided in the submission and subsequent assessment by Planning Officers has led to potential housing numbers and delivery timescales assumptions.

Reporting and Continuous Monitoring

All sites identified as deliverable through the SHLAA assessment process will essentially comprise the land supply of deliverable sites, of which a five year land supply will be included and updated in the Housing Land Availability Report which will be posted on the Councils website⁶.

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⁶ http://www.broxtowe.gov.uk/index.aspx?articleid=4222

4. SHLAA Assumptions

Table 2: SHLAA Assumption Overview

Site Source	Suitability	Availability	Achievability		
			Information Submitted by Developer	Information not submitted	
Site Submitted through SHLAA	Assessment Required	Assumed Available	Use Developer Figures*	Assessment Required	
Unimplemented planning permissions	Assumed Suitable	Assumed Available	Use Developer Figures*	Assessment Required	
Sites under Construction	Assumed Suitable	Assumed Available	Use Developer Figures*	Assessment Required	
Allocated site (with planning permission)	Assumed Suitable	Assumed Available	Use Developer Figures*	Assessment Required	
Allocated site (without Planning permission)	Assumed Suitable	Assumed Available	Use Developer Figures*	Assessment Required	
Council identified sites	Assessment Required	Assessment Required	Use Developer Figures*	Assessment Required	
Lapsed Planning Permission	Assumed Suitable	Assessment Required (however not within the first 5 years).	Use Developer Figures*	Assessment Required	

^{*}If deemed realistic

Sites that have planning permission or have been allocated through the plan process, where nothing has changed since their last assessment, are assumed to be suitable as this would have been assessed as part of the application/development plan process. Sites in the planning system are assumed to be deliverable earlier as commitment has been proven through financial investment in the planning process; for these sites it is considered that the key constraint is likely to be the current economy.

The 5 year housing land supply consists of sites that benefit from dwellings that are still to be built on sites that have been implemented or extant permissions, are allocated in the Local Plan, are currently in the planning system whereby the principle of housing is acceptable or have had recent enquiries that are at an advanced stage. A pessimistic assumption has been taken whereby lapsed permissions have not been assumed to be deliverable within the 5 year trajectory. All large specific sites have been assessed on an individual basis including existing housing allocations whereby a realistic delivery timescale has been applied. On allocated sites the dwelling numbers included in the five year supply is significantly less than the total number of dwellings that the site is expected to deliver, this is as a result of expected delivery timescales spanning delivery tranches and a discount based on site specific constraints.

Estimating the housing potential on each site:

The housing potential for sites with an existing or expired planning consent has the capacity taken from the approved planning permission.

Sites which do not benefit from an extant or expired planning permission have had the capacity estimated on a site by site basis. Where a realistic dwelling number has been suggested in the SHLAA submission, this has been used. For sites without a suggested capacity the following formula has been used to calculate an estimate:

Site Area x Density Assumption x Developable Area Assumption

Density Assumption:

Existing Broxtowe Local Plan policy is shown in the table below which was adopted at a time of minimum densities being specified in the then PPG3.

Table 3: Density Assumption

Proximity to existing public transport*	Density (Dwellings/hectare)
Within 400 metres	40
Beyond 400 metres	35
Default (based on viability)	30

^{*}Note this is based on existing public transport and not what would be expected to be provided with the development.

Whilst the efficient use of land remains government policy in the NPPF a more realistic approach of likely densities is required particularly with regard to viability issues and in the short term at least, higher density developments of smaller homes appear to be less attractive to the market than lower densities of larger family housing. For this reason for sites with no specific density suggested then a 'default' of 30 dwellings per hectare is assumed.

Developable Area Assumption:

The developable area is reduced where more than 500 dwellings are expected, as an increased amount developer provision of things such as infrastructure possibly including a new school and open space would also be required on the site.

Table 4: Developable Area Assumption

Number of Dwellings	Developable Area
Less than 500 (inclusive)	60% (therefore multiply by 0.6)
More than 500	40% (therefore multiply by 0.4)

Note: A site area approximately 21 hectares is the tipping point for 500 dwellings (depending on the density assumption).

The calculated estimate may also however be further influenced by other factors such as;

- The individual characteristics of the site:
- The constraints on the site:
- The characteristics of the surrounding area;
- The suitability for different types of residential development.

Achievability: Estimating the delivery timescales on each site

In the majority of cases for large sites, anticipated completion timescales and rates are provided by the developer/agent/landowner. Where this information has not been provided, then judgements have been made based on the strength of the housing sub market as identified in the Three Dragons report, the conclusions of the GL Hearn report, recent rates of housing delivery in the settlement in question and officers' own local knowledge using the following formula to produce a base line figure.

Housing Market x Number of Developers Building on each site x Build Rate

Housing Market Assumptions:

Stronger markets are assumed to be more popular whereby development is more likely to be forthcoming as a result of quicker (and often higher) returns on developer investment. This is evident with the reference to the delivery rates shown in tables 8 and 9 which provide a good illustration of the accuracy of the analysis of Three Dragons regarding the stronger housing sub

markets in Broxtowe shown in Table 5. As the economic situation improves, it is assumed that sites in moderate and weak markets will become more attractive. Table 5 (based on analysis from Three Dragons in 2009) shows housing market information broken down into ward area.

Table 5: Housing Market Information by Ward

Ward	Housing Market Info
Attenborough	Strong
Awsworth	Moderate
Beeston Central	Strong
Beeston North	Strong
Beeston Rylands	Strong
Beeston West	Strong
Bramcote	Strong
Brinsley	Moderate
Chilwell East	Strong
Chilwell West	Strong
Cossall & Kimberley	Moderate
Eastwood North & Greasley (Beauvale)	Weak
Eastwood South	Weak
Greasley (Giltbrook & Newthorpe)	Weak
Nuthall East & Strelley	Moderate
Nuthall West & Greasley (Watnall)	Moderate
Stapleford North	Weak
Stapleford South East	Weak
Stapleford South West	Weak
Toton & Chilwell Meadows	Strong
Trowell	Moderate

Build Rates

Table 6: Number of Developers assumed to be building on each site

Number of Dwellings on Site	Number of Developers
Up to 100	1
101 – 500	2
501 - 1000	3
Over 1000	4

Table 7: Build Rate where no up to date information is provided by the developer

Time Frame	Dwellings per developer per year
Short Term	20
Long Term	40

'Short term' is considered to be 0 -5 years of the plan whereas 'long term' is considered to be 6+ (i.e. 2018/19 and later) years. This is very conservative and is a significantly slower rate of delivery than is happening in reality; see the tables 8 and 9 for further details. However this cautious approach is based on research undertaken by GL Hearn (Greater Nottingham Housing Market & Economic Prospects paper, 2012) whereby they consider that theoretically house building could recover and grow quite substantially over a 5-7 year period if the economic conditions were right. The Treasury's latest forecasts point to 2015 before we really see economic recovery gather pace. It is against this context in which it seems reasonable to consider that a gradual rather than rapid improvement in housing market conditions is most likely.

GL Hearn identify some risks to the phasing of housing delivery in Eastwood in the early part of the plan period, albeit they also consider that site delivery assumptions at Field Farm and Boots appear reasonable, and overall they conclude that the housing numbers proposed in the Aligned Core Strategy for Broxtowe over the plan period to 2028 look deliverable. As a result of the advice regarding the potential phasing risks in Eastwood and additional alternate sites increasing their delivery probability, the trajectory of many Eastwood sites were amended (between 2012 and 2014) to show later delivery in the plan period.

Sites that are expected to deliver less than 50 dwellings are easier to bring forward as they have less infrastructure and are less likely to require policy change. As shown by completions rates in the table below, since 2007 all large sites in the borough sites of 40 dwellings or less have started and completed development in a year (or just over) apart from the Ponderosa site where the speed of the development may be explained as a smaller local house builder is carrying out the works. It is also worthy of note that sites that wholly comprise of affordable dwellings have largely built out in their entirety in one monitoring year.

Table 8 shows the build rate is as the number of 'monitoring' years (i.e. financial years) that the completion rates spans which in some cases may skew the actual build rate as it may cross monitoring years without actually taking two or more years to complete. In addition the average build rate per year is skewed by developments where the whole development was built in less than a year and where the number of dwellings in that development was which reduces that average as a result.

Even allowing for this since 2007 (excluding the sites that are not complete) a completion rate average of 34 dwellings per year has been achieved, demonstrating that the short term assumed build rate is pessimistic and that potentially higher rates could be achievable (when taking into account the current economic climate).

Table 8: Showing completion rates on implemented large sites since 2007

Site Address	Settlement Area	80/108	60/80	09/10	10/11	11/12	12/13	13/14	Build Rates (Years)	Total granted	Average Build Rate (per year)	% On-Site Affordable Housing
Ponderosa Gin Close Way Awsworth	Awsworth				3	1				(14)*		-
Main Street Awsworth	Awsworth									(67)*		-
Acorn Avenue Giltbrook	Eastwood									(109)*		-
Church Street Eastwood	Eastwood	34							1	34	34	-
Halls Lane Giltbrook	Eastwood				30	41	17		3	88	29.33	25
2-6 Giltway Giltbrook	Eastwood				22				1	22	22	100
Moon and Stars Eastwood	Eastwood				40				1	40	40	100
Giltbrook Dyers & Cleaners Giltbrook	Eastwood				30	29			2	59	29.5	25
Lord Raglan Inn Newthorpe	Eastwood					10			1	10	10	100
Mission Church of St Mary Eastwood	Eastwood					14			1	14	14	-
The Island Eastwood	Eastwood							16	1	16	16	100
Eastwood & Kimberley Community College	Eastwood							(19)	-	(36)*	-	100
Kimberley Road Nuthall	Kimberley						22	2	2	24	12	-
Chetwynd Barracks Chilwell	MBA	31	43						5	383	76.6	-
Bilborough Road Trowell	MBA	49	3						3	194	64.67	-
Queens Road Beeston	MBA	55	42	24	25				4	146	36.5	25
Villa Street Beeston	MBA	12							1	12	12	-
Alderman White School Chilwell	MBA	16	20	20					3	56	18.66	25
Church Street Beeston	MBA		11						1	11	11	-
Warren Arms Derby Road Stapleford	MBA				10				1	10	10	-
36 Nottingham Road Stapleford	MBA					10			1	10	10	100
Long Eaton Textiles Beeston	MBA					12	48	25	3	85	28.33	25
Hall Drive Chilwell	MBA							10	1	10	10	100
Total/Average	-	197	119	44	157	116	87	53	36	1224 ⁷	34	-

^{*}Sites that have stalled or are not yet complete have not been included in the 'total's' calculations

⁷ This includes the residual dwellings built on Chetwynd Barracks and Bilborough Road in the years prior to 2007

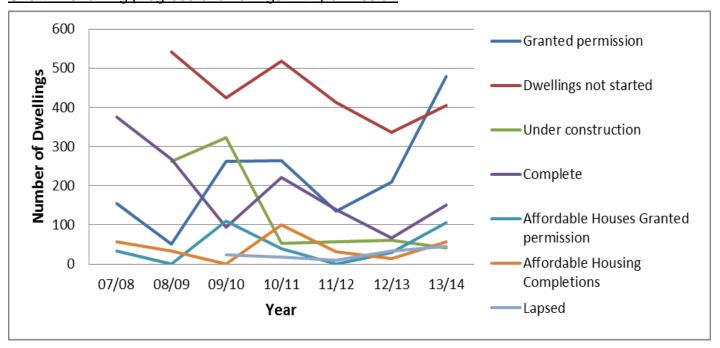
In order to be more accurate regarding build out rates of large sites it was considered to assess sites of 50 or more dwellings. The table below shows the results that on average sites of over 50 dwellings will have a build rate of significantly more than the assumptions made in the SHLAA i.e. 45 dwellings per year. Even in weak housing markets such as Eastwood developers were averaging 29 dwellings per year, however in the strong housing markets of the Main Built-up Area the average build rate for developers (on sites of 50 or more) was 48 dwellings a year.

Table 9 showing build rates of sites with 50 or more dwellings

Site Address	Settlement	Total Dwellings	Number of years site took to build out	Average Build Rate Per Year
Halls Lane Giltbrook	Eastwood	88	3	29.33
Giltbrook Dyers & Cleaners	Eastwood	59	2	29.5
Giltbrook				
Chetwynd Barracks Chilwell	MBA	383	5	76.6
Bilborough Road Trowell	MBA	194	3	64.67
Queens Road Beeston	MBA	146	4	36.5
Alderman White School	MBA	56	3	18.66
Chilwell				
Long Eaton Textiles Beeston	MBA	85	3	28.3
Total		1011	23	44.96

Chart 1 shows that in any one year the number of dwellings with planning permission far outweighs those that are granted or complete and thus there is always a supply of dwellings 'in the system' yet to be built. Over the last 4 years the difference between dwellings not started and dwellings complete has averaged 293 dwellings a year with the two roughly tracking each other, the number of dwellings under construction has varied significantly with the most likely reasoning being the demand for housing from the market. On average 10% of dwellings granted permission lapse (this figure excludes permissions where a revised scheme has been implemented or if a single site has two permissions that lapse the higher dwelling number has been used in the lapse rate calculations so as not to skew the results).

Chart 1: showing progress of dwellings with permission



Lapsed Sites

No lapsed permissions are included in the first 5 year delivery slot. Refusals are included where it is considered that either; the reason for refusal can be overcome, where the decision to refuse the application was taken within the monitoring year (whereby the applicant has a 'free go' at

submitting a revised application) or where the applicant has engaged in further pre-application discussions since the refusal.

Assessing Employment Land for Housing

The NPPF states that there are advantages in undertaking land availability assessments in parallel so that land availability and suitability can be considered across a whole range of land requirements. With this in mind a review of existing employment land (including employment allocations form the 2004 Local Plan) was undertaken in 2012 whereby an assessment of whether existing employment sites should be retained for employment use (in that they provided appropriate facilities and were adaptable for changing employment needs) or if they would be more suitable and available (in whole or part) for release for residential development.

Table 10: Summary of the employment site review

Site Name	Existing Employment Allocation	Retain	Release in part	Release in whole
Chilwell Meadows Business Park Brailsford Way Attenborough	✓	✓		
Beeston Business Park Technology Drive Beeston	✓		✓	
Padge Road Boulevard Industrial Park Beeston	✓	✓		
Lilac Grove Beeston		✓		
Boots Campus Lilac Grove Beeston			✓	
Manor Garage 365 Nottingham Road Toton				✓
Evelyn Street Beeston	✓	✓		
Regent House Lower Regent Street Beeston				✓
The Poplars Beeston	✓	✓		
Land at Former Barton Bus Depot Queens Road Chilwell	✓			✓
Simplex Knitting Co 164 Bye Pass Road Chilwell	✓	✓		
Chetwynd Business Park Regan Way Chilwell	✓	✓		
Fernwood Drive Main Road Watnall	✓	✓		
Barrydale Avenue Beeston	✓			✓
Palmer Drive Stapleford	✓	✓		
Former Dyeworks Site West End Street Stapleford	✓	✓		
Sandiacre Road/Wellington Street Stapleford				✓
Pinfold Trading Estate Nottingham Road Stapleford				✓
135 Pasture Road Stapleford	✓	✓		
Silicone Altimex Ltd 49 Pasture Road Stapleford	✓	✓		
Sinbad Plant Ltd Hickings Lane Stapleford	✓	✓		
Trowell Freight Depot Stapleford Road Trowell				✓
Custom Upholstery Sidings Lane Bramcote				✓
Balloon Wood Industrial Estate Coventry Lane Bramcote				✓
Eagle Mill Ilkeston Road Trowell		✓		
Cossall Industrial Estate Soloman Road Cossall	✓	✓		
Noel Clay Ltd Gin Close Way Awsworth	✓	✓		
Home Farm Nottingham Road Nuthall				✓
British Bakeries (Northern) Ltd Main Road Watnall	✓	✓		
Hardy And Hansons Plc Kimberley Brewery Hardy Street Kimberley			✓	
Broxtowe Borough Council Depot Eastwood Road Kimberley				✓
Giltbrook Industrial Park Giltway Giltbrook	✓	✓		
P P Payne Ltd Giltbrook Industrial Park Giltway Giltbrook	✓	✓		
Land West Of Birch Park Park Lodge Road Giltbrook	✓	✓		
Newmanleys Road Eastwood	✓			✓
Microlise Engineering Ltd Farrington Way Eastwood	✓		✓	
T B C Engineering Services Bailey Grove Road Eastwood	✓	✓		
Meadowbank Court Meadowbank Way Eastwood	✓	✓		
Colliery Lagoon Mansfield Road Nether Green Eastwood	✓	✓		

Moorgreen Colliery Site Engine Lane Moorgreen Industrial Park	✓	✓	
Newthorpe			
Foundry Close Holly Lane Chilwell			✓
Myford Machine Tools Wilmot Lane Beeston			✓
Factory Lane Chilwell		✓	

Windfalls

The NPPF (paragraph 48) says that Local Planning authorities may make an allowance for windfall sites in the five year supply if they have compelling evidence that such sites have consistently become available in the local area and will continue to provide a reliable source of supply. This allowance should be realistic whereby the Strategic Housing Land Availability Assessment provides key information to support this.

Through the SHLAA Broxtowe will be looking to make specific allocations on sites of 10 or more dwellings, as a result of the thoroughness of the SHLAA it is considered appropriate to look back more recently at small sites and, excluding gardens (as required in the NPPF), to assess whether there is evidence of windfalls providing a reliable source of supply. The table below shows the small sites (excluding garden land) which have been classed as windfall because the sites were not allocated for development.

Table 11: 5 Year Net Windfall Completions on Small Sites 2009 - 2014 (sites not allocated)

Year	Net Windfall completions on small sites (excluding gardens)
2009-10	36
2010-11	62
2011-12	23
2012-13	23
2013-14	37
Total	181

Windfall has been historically high with the majority of previous windfalls being located within the Main Built Up Area and in Eastwood.

In order to draw a comparison from the above windfall figure and because the SHLAA is so detailed, it was also considered that windfalls could also be calculated in terms of all sites (large and small) that were not counted in the previous year's SHLAA (because they were not known about). This is the first year that this monitoring has been undertaken and the results are shown below.

<u>Table 12: Windfalls calculated by adding dwelling numbers on all unallocated sites that were not included in last year's SHLAA</u>

Year	Number of dwellings on all new sites
2013-14	173
Total	173

Housing Implementation Strategy:

The NPPF also states that planning authorities should "set out a housing implementation strategy for the full range of housing describing how they will maintain delivery of a five-year supply of housing land to meet their housing target".

Partnership working on the SHLAA methodology ensures that there is a balanced portfolio of deliverable sites across the plan area. The Aligned Core Strategies demonstrates the Council's commitment to work with other partners and agencies to ensure successful implementation of the plan within which housing targets are identified and broad locations for growth (key settlements and strategic sites and locations for growth) are set out.

The Council actively and positively engages in pre-application discussions with developers, in addition to the engagement process with developers and landowners through the SHLAA. Developer consultation with stakeholders is encouraged at an early stage to ensure that issues are resolved as far as possible prior to planning applications being submitted. The Council endeavours to determine planning applications in a timely manner. The Council has also taken a pragmatic approach to the negotiation of S106 requirements, taking particular note of the viability of sites and the current economic climate.

Current sites where reduced S106 contributions are being negotiated:

- Beeston Business Park
- Boots
- Beamlight
- Kimberley Brewery
- Pinfold Trading Estate
- Chewton Street (already agreed)

A thorough assessment of sites has been undertaken and a realistic judgement has been made based on the constraints that influence the site. A tentative approach to the assumptions has been taken to ensure that the delivery of sites is achievable over the plan period.

Acute and regular monitoring of sites takes place so as to inform the SHLAA and keep data relevant and up-to-date. Annual monitoring will ensure that if housing targets are not being met within set timeframes there are remedial actions in place to deal with this in that the Council will engage with landowners and prospective developers to identify the obstacles and constraints to housing delivery.

5. Summary

The SHLAA is measured separately against the requirements of the Aligned Core Strategy, which together with the other Core Strategies in the HMA provides for the full objectively assessed housing need across the HMA.

Table 13: Existing Capacity found on Specific Sites within the Urban Area

	Core	Annual Gains & Losses (2011-2014)		Specific Sites within the Urban Area					Residual		
	Strategy Requirement		Completions (Net Gains)			Years Years		Years	Windfall Allowance	Total	Requirement (left to be
	(2011-2028)	11- 12	12- 13	13- 14	Total 11-14	2014-18 Capacity	2018-23 Capacity	2023-28 Capacity			found)
Awsworth	350	1	-	-	1	87	16	-	-	104	246
Brinsley	150	-	2	9	11	4	5	21	-	41	109
Eastwood	1250	98	18	45	161	319	443	61	100	1084	166
Kimberley	600	1	26	10	37	118	262	34	-	451	149
MBA	3800	40	21	86	147	804	1687	105	200	2943	857*
Other Rural	0	-	-	-	-	2	-	-	-	2	-2
Adjacent Hucknall	0	-	-	-	-	-	-	-	-	-	-
Sub Total	6150	140	67	150	357	1334	2413	221	300	4625	1525
Strategic Location at Toton	500+	-	-	-	-	100	400	-	-	500	-500
Total	6150	140	67	150	357	1434	2813	221	300	5125	1025

^{*}This figure does not take into account the Strategic Location for Growth at Toton

Therefore 6150 (requirement) - 5125 (total capacity found on urban sites including Field Farm, Boots & Seven Trent and Strategic Location for Growth at Toton) = 1025 left to find.

As the existing total capacity on specific sites does not meet the requirement as set out in the Aligned Core Strategy further sites will be required outside of the urban area, therefore amendments will need to be made to the existing Green Belt boundaries. A review of Green Belt boundaries will be concluded through the part 2 Local Plan. The part 2 Local Plan will allocate selected sites from the 'could be suitable if policy changes' list for future development in order to meet the need for housing for the next 15 years.

The table 14 shows the potential capacity of all of the 'could be suitable if policy changes' sites (i.e. those located in the Green Belt). The capacity shown in the table demonstrates that the development requirements in the Borough throughout the plan period can be met and indeed not all of the recognised sites will be required to be removed from the Green Belt. These sites were subject to a ten week 'Issues and Options' consultation over the winter of 2013-14

Table 14: Potential capacity from Green Belt sites that could be suitable if policy changes

	Years 2013-18 Capacity	Years 2018-23 Capacity	Years 2023-28 Capacity	Total Potential Capacity from Green Belt Sites
Awsworth	-	204	295	499
Brinsley	-	221	375	596
Eastwood	-	609	1012	1621
Kimberley	-	410	585	995
MBA	-*	2715*	3411	6126
Other Rural	-	53	17	70
Adjacent Hucknall	-	39	27	66
Total	-	4231	5722	9953

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6. Large Housing Site Assessment Results

The following tables are displayed in settlement area and have been sorted based on the start delivery tranch and have then been organised into total dwelling numbers deliverable. The tables have been coloured to show the source of the site (or part of) as per the following key. Where a site has more than one source the most current is used (e.g. if a site is allocated in the 2004 Local Plan and has an extant planning permission then the source of the dwellings would be shown as the planning permission).

Key Settlement: Awsworth

Key:	Planning Permission Pending Consideration
	Lapsed / Withdrawn/ Refused Permission
	Not Allocated & with No Planning Permission
	Under Construction/ Implemented Planning Permission

Site Ref	Site Name	Delivery	CS Plan Period 2013-2028			
			0-5 Years 2013- 2018	6-10 Years 2018- 2023	11-15 Years 2023- 2028	
36	Ponderosa Gin Close Way Awsworth	0-5 Years	10	-	-	
35	Land off Main Street Awsworth	0-5 Years	12	-	-	
136	East of Main Street Awsworth	0-5 Years	20	-	-	
564	Land At Gin Close Way Awsworth	0-5 Years	45	15	-	
361	40 Main Street Awsworth	6-10 Years	-	1	-	
Sub Total			87	16	-	
394	Land to rear of 13-27 The Glebe Cossall	Could be suitable if policy changes	-	32	-	
190	North of Barlows Cottages Awsworth	Could be suitable if policy changes	-	30	20	
192	West of Awsworth Lane/South of Newtons Lane Cossall	Could be suitable if policy changes	-	75	125	
117	Land at Newtons Lane Awsworth	Could be suitable if policy changes	-	67	150	
114	Gin Close Way Awsworth	Non Deliverable or Developable	-	-	-	
194	East of The Lane/Main Street Awsworth	Non Deliverable or Developable	-	-	-	
333	Land West of Gin Close Way	Non Deliverable or Developable	-	-	-	
432	Bennerley Disposal Point Land Between A610 And Gin Close Way	Non Deliverable or Developable	-	-	-	
Sub Total			-	204	295	
Total	-	-	87	220	295	

Key Settlement: Brinsley

Key:	With Extant Planning Permission (as at 1 April 2014)
	Planning Permission Pending Consideration
	Lapsed / Withdrawn/ Refused Permission
	Not Allocated & with No Planning Permission
	Under Construction/ Implemented Planning Permission

Site Ref	Site Name	Delivery	CS Plan	Period 201	3-2028
			0-5 Years 2013-	6-10 Years 2018-	11-15 Years 2023-
8	36 Main Street Brinsley	0-5 Years	2018	2023	2028
O	30 Main Greet Britisley	0 0 Todis	'		
81	Oak Tree Cottage 26-28 Cordy Lane Brinsley	0-5 Years	1	-	-
53	Manor Farm Hall Lane Brinsley	0-5 Years	2	-	-
77	44 Mansfield Road Brinsley	6-10 Years	-	1	-
404	Land adjacent to Robin Hood Inn, 17 Hall Lane, Brinsley	6-10 Years	-	1	-
55	Merrin Builders 66-70 Hobsic Close Brinsley	6-10 Years	-	3	-
200	West of High Street Brinsley	11-15 Years	-	-	21
Sub Total	-	-	4	5	21
128	Land to the rear of Robin Hood Inn, 17 Hall Lane, Brinsley	Could be suitable if policy changes	-	-	11
376	Land Opposite 28 Church Lane Brinsley	Could be suitable if policy changes	-	30	55
198	East of Church Lane Brinsley	Could be suitable if policy changes	-	80	120
197	North of Cordy Lane Brinsley	Could be suitable if policy changes	-	111	189
199	North of Hall Lane Brinsley	Non Deliverable or Developable	-	-	-
Sub Total	-	-	-	221	375
Total	-	-	4	226	396

Key Settlement: Eastwood

Key:	With Extant Planning Permission (as at 1 April 2014)
	Planning Permission Pending Consideration
	Lapsed / Withdrawn/ Refused Permission
	Not Allocated & with No Planning Permission
	Under Construction/ Implemented Planning Permission
	2004 Local Plan Residential Allocation
	2004 Local Plan Employment Allocation

Site Ref	Site Name	Delivery	CS Plan	CS Plan Period 2013-2028			
			0-5 Years 2013- 2018	6-10 Years 2018- 2023	11-15 Years 2023- 2028		
43	Land at 19 Mill Road Newthorpe	0-5 Years	1	-	-		
74	Land at 56 Smithurst Road Giltbrook	0-5 Years	1	-	-		
554	16 Derby Road Eastwood	0-5 Years	1	-	-		
563	200 Lynncroft Eastwood	0-5 Years	1	-	-		
581	32 Mansfield Road Eastwood	0-5 Years	1	-	-		
598	19 Vale Close Eastwood	0-5 Years	1	-	-		
618	31A Nottingham Road Eastwood	0-5 Years	1	-	-		
624	22 Brookhill Leys Road Eastwood	0-5 Years	1	-	-		
82	D R Constructions 35-37 Barber Street Eastwood	0-5 Years	2	-	-		
272	Car Park Cross Street Eastwood	0-5 Years	2	-	-		
27	246 Main Street Newthorpe	0-5 Years	2	-	-		
608	Land adjacent to Methodist Church Newthorpe Common Newthorpe	0-5 Years	5	-	-		
522	Castle College Eastwood And Kimberley Community College Chewton Street Eastwood	0-5 Years	17	-	-		
147	East of Pinfold Road Newthorpe	0-5 Years	20	-	-		
125	Land at Church Street Eastwood	0-5 Years	22	-	-		
134	Springbank Primary School Devonshire Drive Eastwood	0-5 Years	29	-	-		
519	Land Off Thorn Drive And West Of The Pastures Thorn Drive Newthorpe	0-5 Years	18	15	-		
521	Beamlight Automotive Seating Ltd Tricom House Newmanleys Road Eastwood	0-5 Years	40	150	-		
34	Land off Acorn Avenue Giltbrook	0-5 Years	30	37	-		
143	South of Smithurst Road Giltbrook	0-5 Years	54	37	-		
138	Walker Street Eastwood	0-5 Years	70	70	61		

Site	Site Name	Delivery	CS Plan Period 2013-2028			
Ref			0-5 Years 2013-	6-10 Years 2018-	11-15 Years 2023-	
41	188 Newthorpe Common Eastwood	6-10 Years	2018	2023	2028	
	·					
70	282 Nottingham Road Eastwood	6-10 Years	-	1	-	
139	95 South Street Eastwood	6-10 Years	-	1	-	
157	27 Wellington Street Eastwood	6-10 Years	-	1	-	
284	Oaks Farm Wiley Lane Newthorpe	6-10 Years	-	2	-	
497	239 Nottingham Road Eastwood	6-10 Years	-	2	-	
160	18 Brookhill Leys Road Eastwood	6-10 Years	-	3	-	
474	Dovecote Bar and Grill 29 Beauvale Newthorpe	6-10 Years	-	6	-	
349	66 Dovecote Road, Eastwood	6-10 Years	-	10	-	
496	Greasley Beauvale D H Lawrence Primary School Beauvale Newthorpe	6-10 Years	-	10	-	
508	Hilltop House Nottingham Road Eastwood	6-10 Years	-	10	-	
628	Eastwood & District Victory Club Walker Street Eastwood	6-10 Years	-	13	-	
129	Telford Drive, Newthorpe	6-10 Years	-	14	-	
163	132 Chewton Street Eastwood	6-10 Years	-	20	-	
130	Church Street Eastwood (Raleigh)	6-10 Years	-	40	-	
Sub Total	-	-	319	443	61	
204	North of 4 Mill Road Beauvale	Could be suitable if policy changes	-	33	55	
514	Hall Farm Cockerhouse Road Eastwood	Could be suitable if policy changes	-	42	56	
3	Wade Printers Baker Road Newthorpe	Could be suitable if policy changes	-	75	125	
208	West of Moorgreen	Could be suitable if policy changes	-	96	166	
206	E of Baker Rd/N of Nottm Road Giltbrook	Could be suitable if policy changes	-	105	178	
203	Nether Green East of Mansfield Rd Eastwood	Could be suitable if policy changes	-	114	186	
413	Mansfield Road, Nether Green	Could be suitable if policy changes	-	144	246	
102	Land at Horse and Groom Moorgreen	Non Deliverable or Developable	-	-	-	
126	Sun Inn, 6 Derby Road, Eastwood	Non Deliverable or Developable	-	-	-	
146	Chewton Street Newthorpe	Non Deliverable or Developable	-	-	-	

Site	Site Name	Delivery		CS Plan Period 2013-2028		
Ref			0-5 Years	6-10 Years	11-15 Years	
			2013- 2018	2018- 2023	2023- 2028	
205	East of Greenacres Close Newthorpe	Non Deliverable or Developable	-	-	-	
213	Mansfield Road Park Play Area Mansfield Road Eastwood	Non Deliverable or Developable	-	-	-	
256	Land at Engine Lane, Lower Beauvale, Eastwood	Non Deliverable or Developable	-	-	-	
492	43 Moorgreen Newthorpe	Non Deliverable or Developable	-	-	-	
506	Land Rear Of Poplar Farm 1 Moorgreen Newthorpe	Non Deliverable or Developable	-	-	-	
517	T B C Engineering Services Bailey Grove Road Eastwood	Non Deliverable or Developable	-	-	-	
Sub Total	-	-	-	609	1012	
Total	-	-	319	1130	1177	

Key Settlement: Kimberley

Key:	With Extant Planning Permission (as at 1 April 2014)
	Planning Permission Pending Consideration
	Lapsed / Withdrawn/ Refused Permission
	Not Allocated & with No Planning Permission
	Under Construction/ Implemented Planning Permission
	2004 Local Plan Residential Allocation
	2004 Local Plan Employment Allocation

Site Ref	Site Name	Delivery	CS Plan Period 2013-202		2013-2028
			0-5 Years	6-10 Years	11-15 Years
			2013- 2018	2018- 2023	2023-2028
14	Land adjacent Elm Farm Trough Lane Watnall	0-5 Years	1	-	-
226	Land at Browns Flatts Kimberley	0-5 Years	1	-	-
562	Castle College Church Hill Centre Church Hill Kimberley	0-5 Years	1	-	-
569	Systems Instillation Supplies 5A Regent Street Kimberley	0-5 Years	1	-	-
576	Electricity Substation James Street Kimberley	0-5 Years	1	-	-
606	59 Gilt Hill Kimberley	0-5 Years	1	-	-
611	RAF bunker Rear or 140 Main Road Watnall	0-5 Years	1	-	-
613	95 Kimberley Road Nuthall	0-5 Years	1	-	-
619	4 And 6 Hardy Street Kimberley	0-5 Years	2	-	-
622	73 Main Street Kimberley	0-5 Years	2	-	-
623	Ex Servicemens Club Station Road Kimberley	0-5 Years	2	-	-
621	Nottinghamshire Police Kimberley Police Station Church Hill Kimberley	0-5 Years	3	-	-
599	2, 4 & 6 Oak Lodge Drive Kimberley	0-5 Years	5	-	-
145	Land Between 3 And 12 Hardy Close Kimberley	0-5 Years	21	-	-
586	Hardy And Hansons Plc Kimberley Brewery Hardy Street Kimberley	0-5 Years	75	85	-
50	1A Nottingham Road Nuthall	6-10 Years	-	1	-
72	Land at 29 Oak Drive Nuthall	6-10 Years	-	1	-
353	Land at 14 Kimberley Road Nuthall	6-10 Years	-	1	-
210	Land South East Of 32 To 40 Maws Lane Kimberley	6-10 Years	-	12	-
631	29 Edward Road Nuthall	6-10 Years	-	12	-

Site Ref	Site Name	Delivery	CS Plar	n Period 2	2013-2028
			0-5 Years	6-10 Years	11-15 Years
			2013- 2018	2018- 2023	2023-2028
629	7 Spencer Drive Nuthall	6-10 Years	-	13	-
428	Land To Rear Of Chilton Drive Watnall	6-10 Years	-	16	-
219	West of The Paddocks Nuthall	6-10 Years	-	19	-
518	Rear Of 127 Kimberley Road Nuthall	6-10 Years	-	20	-
140	Builders Yard, Eastwood Road, Kimberley	6-10 Years	-	22	-
218	South of Kimberley Road Nuthall	6-10 Years	-	30	-
144	South of Eastwood Road Kimberley	6-10 Years	-	30	10
228	NW of Chestnut Drive Nuthall	11-15 Years	-	-	24
Sub Total	-	-	118	262	34
103	Land east of New Farm Lane Nuthall	Could be suitable if policy changes	-	12	-
473	Home Farm Nottingham Road Nuthall	Could be suitable if policy changes	-	-	14
131	Church Hill Kimberley	Could be suitable if policy changes	-	16	10
116	Land north of 38 Alma Hill Kimberley	Could be suitable if policy changes	-	15	30
234	Land At New Farm Lane Nuthall	Could be suitable if policy changes	-	30	20
113	Land north of Alma Hill Kimberley	Could be suitable if policy changes	-	28	44
105	Land west of New Farm Lane Nuthall	Could be suitable if policy changes	-	48	32
411	2 High Street Kimberley	Could be suitable if policy changes	-	60	40
285	Land North Alma Hill / West Of Millfield Road Kimberley	Could be suitable if policy changes	-	16	100
271	Gilt Hill Farm Gilt Hill Kimberley	Could be suitable if policy changes	-	80	120
215	Land Adjacent To Kimberley Depot Eastwood Road Kimberley	Could be suitable if policy changes	-	105	175
229	North of Gilt Hill Kimberley	Non Deliverable or Developable	-	-	-
112	Land south of Spring Hill Kimberley	Non Deliverable or Developable	-	-	-
118	Land to west of M1 Nuthall	Non Deliverable or Developable	-	-	-
188	Land At Watnall	Non Deliverable or Developable	-	-	-
227	East of Main Road Watnall	Non Deliverable or Developable	-	-	-
364	South of Babbington Lane Kimberley	Non Deliverable or Developable	-	-	-

Site Ref	Site Name	e Delivery		CS Plan Period 2013-2028		
			0-5 Years	6-10 Years	11-15 Years	
			2013- 2018	2018- 2023	2023-2028	
416	Watnall Bakery, Main Road, Watnall British Bakeries (Northern) Ltd	Non Deliverable or Developable	-	-	-	
430	Land Off Laurel Crescent Nuthall	Non Deliverable or Developable	-	-	-	
424	South-West Of Motorway, North-East Of Main Road Watnall	Non Deliverable or Developable	-	-	-	
494	Long Close Babbington Lane Kimberley	Non Deliverable or Developable	-	-	-	
			-	410	585	
Total			118	672	619	

Broxtowe Borough Council Strategic Housing Land Availability Assessment (SHLAA) 2013/14 Key Settlement: Main Built-up Area (MBA)

Key:	With Extant Planning Permission (as at 1 April 2014)
	Planning Permission Pending Consideration
	Lapsed / Withdrawn/ Refused Permission
	Not Allocated & with No Planning Permission
	Under Construction/ Implemented Planning Permission
	2004 Local Plan Residential Allocation
	2004 Local Plan Employment Allocation
8	2014 Core Strategy Strategic Location for growth
	2014 Core Strategy Site Allocation

Site Ref	Site Name	Delivery	CS Plan	CS Plan Period 2013-2028			
		0-5 Years	6-10 Years	11-15 Years			
			2013- 2018	2018- 2023	2023- 2028		
10	25 Wadsworth Road Stapleford	0-5 Years	1	-	-		
24	3 The Jardines Bramcote	0-5 Years	1	-	-		
170	1 Fletcher Road Beeston	0-5 Years	1	-	-		
252	79 High Road Toton	0-5 Years	1	-	-		
282	Land adjacent 71 Abbey Road Beeston	0-5 Years	1	-	-		
295	104 Cow Lane Bramcote	0-5 Years	1	-	-		
373	Land to rear of 58 Temple Drive Nuthall	0-5 Years	1	-	-		
406	Land Adjacent The Grange Town Street Bramcote	0-5 Years	1	-	-		
498	1 Burnham Avenue Chilwell	0-5 Years	1	-	-		
502	61 Marton Road Chilwell	0-5 Years	1	-	-		
555	40 Broadgate Beeston	0-5 Years	1	-	-		
575	23 Grove Avenue Chilwell	0-5 Years	1	-	-		
585	61 Hall Drive Chilwell	0-5 Years	1	-	-		
593	33 Grove Avenue Chilwell	0-5 Years	1	-	-		
594	Manor Court House Manor Court Peache Way Bramcote	0-5 Years	1	-	-		
601	Toton Post Office 2 Stapleford Lane Toton	0-5 Years	1	-	-		
607	Shirley Court Norfolk Avenue Toton	0-5 Years	1	-	-		
609	221 Pasture Road Stapleford	0-5 Years	1	-	-		
612	54 Hickings Lane Stapleford	0-5 Years	1	-	-		
38	61 High Road Beeston	0-5 Years	2	-	-		
181	14 Temple Drive Nuthall	0-5 Years	2	-	-		
184	40C Derby Road Beeston	0-5 Years	2	-	-		

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⁸ Detailed site boundaries to be confirmed as part of Broxtowe Part 2 Local Plan

Site Ref	Site Name	Delivery	CS Plan Period 2013-2028			
			0-5 Years 2013- 2018	6-10 Years 2018- 2023	11-15 Years 2023- 2028	
535	Land To The Rear Of 294 Nottingham Road Toton	0-5 Years	2	-	-	
572	178 Nottingham Road Stapleford	0-5 Years	1	-	-	
541	Chilwell Methodist Church Clarkes Lane Chilwell	0-5 Years	2	-	-	
596	40 Great Hoggett Drive Chilwell	0-5 Years	2	-	-	
516	32 Hall Croft Beeston	0-5 Years	3	-	-	
567	201-209 Queens Road Beeston	0-5 Years	3	-	-	
350	52 Nottingham Road Stapleford	0-5 Years	4	-	-	
595	2 - 4 Derby Road Stapleford	0-5 Years	4	-	-	
600	Garages Midland Avenue Stapleford	0-5 Years	4	-	-	
605	69 Derby Road Bramcote	0-5 Years	4	-	-	
96	The Beeston Cobbler 184 Station Road Beeston	0-5 Years	6	-	-	
587	242-254 Derby Road Stapleford	0-5 Years	6	-	-	
614	Land to Rear of 98 Church Street Stapleford	0-5 Years	6	-	-	
187	55-57 Carrfield Avenue Toton	0-5 Years	7	-	-	
463	The Three Horseshoes Middle Street Beeston	0-5 Years	7	-	-	
574	Land Rear of 89 Inham Road Chilwell	0-5 Years	7	-	-	
297	Hoftons Roberts Yard Beeston	0-5 Years	8	-	-	
525	Elm House Nursing Home 22 Elm Avenue Beeston	0-5 Years	8	-	-	
28	Hofton & Son Ltd Regent Street Beeston	0-5 Years	12	-	-	
589	84 Broadgate Beeston	0-5 Years	12	-	-	
12	Moults Yard, 68-70 Nottingham Road, Stapleford	0-5 Years	15	-	-	
239	Works Bailey Street Stapleford	0-5 Years	15	-	-	
591	Castle College Middle Street Centre 10 Middle Street Beeston	0-5 Years	17	-	-	
543	Inham Nook Methodist Church Pearson Avenue Chilwell	0-5 Years	24	-	-	
509	Trowell Freight Depot Stapleford Road Trowell	0-5 Years	33	-	-	
51	Units 12-15 Pinfold Trading Estate Nottingham Road Stapleford	0-5 Years	50	-	-	
408	Myford Machine Tools Wilmot Lane Beeston	0-5 Years	32	49	-	
220	Land East of Low Wood Road Nuthall	0-5 Years	29	87	-	
95	Allotments, Hassocks Lane, Beeston	0-5 Years	130	-	-	
499	Beeston Business Park Technology Drive Beeston	0-5 Years	94	191	-	

Site	Site Name	Delivery	CS Plan Period 20		13-2028
Ref			0-5 Years	6-10 Years	11-15 Years
			2013- 2018	2018- 2023	2023- 2028
108	Field Farm Land north of Ilkeston Road Stapleford	0-5 Years	250	200	-
25	72 Beeston Fields Drive Bramcote	6-10 Years	-	1	-
26	18 Middleton Crescent Beeston	6-10 Years	-	1	-
60	Land at 39 Templar Road Beeston	6-10 Years	-	1	-
85	Land at 143 Toton Lane Stapleford	6-10 Years	-	1	-
148	50 Hanley Avenue Bramcote	6-10 Years	-	1	-
155	4 Inham Road Chilwell	6-10 Years	-	1	-
156	8 Grove Street Beeston	6-10 Years	-	1	-
291	Land adjacent 11 Clinton Street Beeston	6-10 Years	-	1	-
293	86 Beeston Fields Drive Beeston	6-10 Years	-	1	-
456	12 Brookland Drive Chilwell	6-10 Years	-	1	-
166	205-209 Station Road Beeston	6-10 Years	-	2	-
616	72 Brookhill Street Stapleford	6-10 Years	-	2	-
625	2 Bramcote Lane and 38 Hallams Lane Chilwell	6-10 Years	-	3	-
64	Land at Sycamore Court Broadgate Beeston	6-10 Years	-	6	-
66	1 Hickings Lane Stapleford	6-10 Years	-	7	-
100	22 Wollaton Road Beeston	6-10 Years	-	8	-
447	Best Fabric International Ltd 12 High Road Chilwell	6-10 Years	-	8	-
455	Double Top Public House Bramcote Lane Chilwell	6-10 Years	-	8	-
94	45 Nether Street Beeston	6-10 Years	-	9	-
1	92-106 Broadgate Beeston	6-10 Years	-	10	-
310	Neville Sadler Court Beeston	6-10 Years	-	10	-
265	Beeston Police Station Chilwell Road Beeston	6-10 Years	-	10	-
419	Wadsworth Rd, Stapleford, Nottingham	6-10 Years	-	11	-
6	N K Motors, 205a Bye Pass Road, Chilwell	6-10 Years	-	12	-
301	7A Middleton Crescent Beeston	6-10 Years	-	15	-
548	Beeston Van Hire 2 Barton Way Chilwell	6-10 Years	-	19	-
261	Brethren Meeting Hall Hillside Road Beeston	6-10 Years	-	20	-
449	Beeston Cement Depot Station Road Beeston	6-10 Years	-	21	-
590	The Cow At Beeston Middle Street Beeston	6-10 Years	-	24	-
630	Castle College The Whiteley Mill 39 Nottingham Road Stapleford	6-10 Years	-	24	-

Site Ref	Site Name	Delivery	CS Plan Period 2013-2028		
Ref			0-5 Years 2013-	6-10 Years 2018-	11-15 Years 2023-
398	Manor Garage 365 Nottingham Road Toton	6-10 Years	2018	2023 27	2028
389	Neville Sadler Court, Beeston	6-10 Years	-	27	-
135	Field Lane Chilwell	6-10 Years	-	34	-
343	St Johns College, Peache Way, Bramcote	6-10 Years	-	35	-
150	Beeston Maltings, Dovecote Lane, Beeston	6-10 Years	-	56	-
420	Land North of Stapleford Road Trowell, E of M1	6-10 Years	-	60	-
20	Chetwynd Barracks Chetwynd Road Chilwell	6-10 Years	-	61	-
360	Chetwynd Barracks Chetwynd Road Chilwell	6-10 Years	-	61	-
195	Former Bartons Bus Depot Queens Road Chilwell	6-10 Years	-	110	-
258	Land at Lilac Grove, Beeston	6-10 Years	-	50	100
237	The Boots Company Beeston site	6-10 Years	-	400	-
345	Land to rear of 29 Kingrove Avenue Chilwell	11-15 Years	-	-	5
Losses	,				
460 ⁹	Peatfield Court Peatfield Road Stapleford	0-5 Years	-5	-	-
458 ¹⁰	Wyndham Court Field Lane Chilwell	0-5 Years	-13	-	-
Sub Total			804	1687	105
602	The Gables Strelley Lane Strelley	Could be suitable if policy changes	-	20	-
356	East of Field Farm Sidings Lane Bramcote	Could be suitable if policy changes	-	75	51
133	Land at Toton Lane Stapleford	Could be suitable if policy changes	100	400	-
415	Ashlands Bilborough Road Trowell	Could be suitable if policy changes	-	24	20
254	Land East of Toton Lane/Stapleford Lane, Toton	Could be suitable if policy changes	-	36	24
412	Chilwell Lane Bramcote (sth of Common Lane)	Could be suitable if policy changes	-	44	30
123	Coventry Lane Bramcote	Could be suitable if policy changes	-	55	19
410	Land South Of 45 Baulk Lane Stapleford	Could be suitable if policy changes	-	52	40
414	Land Behind Sisley Avenue, Stapleford	Could be suitable if policy changes	-	59	40
259	Land off Toton Lane, Toton – East	Could be suitable if policy changes	-	60	40
403	Bardills Garden Centre Toton Lane Stapleford	Could be suitable if policy changes	-	90	60
111	Land off Moss Drive Bramcote	Could be suitable if policy changes	-	90	60

 $^{^9}$ 23 new dwellings following the demolitions of 28 largely unoccupied dwellings, net gain $^{-5}$ 13 new dwellings including the demolition of 27 existing flats net gain $^{-13}$

Site	Site Name	Delivery		CS Plan	Period 201	3-2028
Ref				0-5 Years	6-10 Years	11-15 Years
				2013- 2018	2018- 2023	2023- 2028
407	Land Between A52 Stapleford And Chilwell Lane Bramcote	Could be suitable policy changes	if	-	90	160
107	Land at Woodhouse Way Nuthall	Could be suitable policy changes	if	-	180	120
132	Land at Wheatgrass Farm Toton	Could be suitable policy changes	if	-	100	200
358	Toton Sidings Derby Road Stapleford	Could be suitable policy changes	if	-	156	261
632	Land at Bramcote Hills Sport & Community College Moor Lane Bramcote	Could be suitable if policy changes		-	168	282
178	Land Between Elton And The Woodards Bilborough Road Trowell	Could be suitable policy changes	if	-	420	340
298	Spring Farm Nottingham Road Trowell Moor Trowell	Could be suitable policy changes	if	-	426	714
104	Land off Coventry Lane Bramcote	Could be suitable policy changes	if	-	570	950
109	Low Wood Road Nuthall		or	-	-	-
110	Land off Moss Drive Bramcote		or	-	-	-
115	Mill Farm Stapleford		or	-	-	-
119	Land at Coopers Green Beeston	,	or	-	-	-
127	Bramcote Hills Golf Club Thoresby Road Bramcote	· · · · · · · · · · · · · · · · · · ·	or	-	-	-
151	Beeston Marina Riverside Road Beeston		or	-	-	-
158	Storage Yard Bowden Drive Boulevard Industrial Park Beeston	•	or	-	-	-
183	Sports Ground, Bailey Street, Stapleford		or	-	-	-
191	Land Off Coventry Land And Moor Farm Inn Bramcote		or	-	-	-
193	Chetwynd Barracks Chetwynd Road Chilwell	Non Deliverable Developable	or	-	-	-
196	North of Hall Gardens Bramcote	Non Deliverable Developable	or	-	-	-
202	Central Avenue Play Area Central Avenue Stapleford	Non Deliverable Developable	or	-	-	-
212	East of Motorway/North of Nottingham Road Nuthall	,	or	-	-	-
221	NW of A52 Stapleford Hill Top Farm		or	-	-	-
230	Lower Regent Street Beeston		or	-	-	-
232	Sandiacre Road Stapleford		or	-	-	-
240	West End Street Stapleford		or	-	-	-
307	116 Station Road Beeston		or	-	-	-
363	Weirfields South-East of Canal Side Beeston		or	-	-	-
365	East of Motorway / West of Low Wood Road Nuthall		or	-	-	-

Site Ref	Site Name	Delivery	CS Plan	Period 2013	3-2028
IVE			0-5 Years	6-10 Years	11-15 Years
			2013- 2018	2018- 2023	2023- 2028
417	Land North of Nottingham Rd, Trowell	Non Deliverable or Developable	-	-	-
421	Land at Nottingham Rd Nuthall bounded by A610 & M1	Non Deliverable or Developable	-	-	-
510	Land Rear Of Chilwell Retail Park Barton Lane Attenborough	Non Deliverable or Developable	-	-	-
515	Evelyn Street Beeston	Non Deliverable or Developable	-	-	-
550	Land At High Road Chilwell	Non Deliverable or Developable	-	-	-
Sub Total	-	-	200	3115	3411
Total	-	-	1004	4802	3516

Other Rural

Key:	With Extant Planning Permission (as at 1 April 2014)
	Planning Permission Pending Consideration
	Lapsed / Withdrawn/ Refused Permission
	Not Allocated & with No Planning Permission
	Under Construction/ Implemented Planning Permission
	2004 Local Plan Residential Allocation
	2004 Local Plan Employment Allocation
	Core Strategy Strategic Site/Location for growth

Site Ref	Site Name	Delivery	CS Plan Period 2013-2028		
			0-5 Years	6-10 Years	11-15 Years
			2013- 2018	2018- 2023	2023- 2028
154	Marsh Farm Church Lane Cossall	0-5 Years	2	-	-
Sub Total	-	-	2	-	-
189	Land At Smithfield Avenue Trowell	Could be suitable if policy changes	-	53	17
214	North and West of Asworth Lane Cossall	Non Deliverable or Developable	-	-	-
216	Lee Sisson And Co Ltd Newtons Lane Cossall	Non Deliverable or Developable	-	-	-
121	Shortwood Farm Trowell	Non Deliverable or Developable	-	-	-
122	Robbinetts Awsworth	Non Deliverable or Developable	-	-	-
223	Adjacent To The Forge Trowell	Non Deliverable or Developable	-	-	-
224	East of Cossall Road Trowell	Non Deliverable or Developable	-	-	-
233	Land To The West of Cossall Road Trowell	Non Deliverable or Developable	-	-	-
235	Land East of M1 Watnall	Non Deliverable or Developable	-	-	-
255	New Farm Lane, Nuthall	Non Deliverable or Developable	-	-	-
334	Land West of Cossall Road Trowell	Non Deliverable or Developable	-	-	-
362	North of Coronation Road Cossall	Non Deliverable or Developable	-	-	-
370	East of Motorway / North of Long Lane Watnall	Non Deliverable or Developable	-	-	-
423	Land Adjacent To Allotments Coronation Road Cossall	Non Deliverable or Developable	-	-	-
425	East Of Motorway/South Of Long Lane Watnall	Non Deliverable or Developable	-	-	-
472	Cossall Industrial Estate Soloman Road Cossall	Non Deliverable or Developable	-	-	-
512	Eagle Mill Ilkeston Road Trowell	Non Deliverable or Developable	-	-	-
Sub Total	-	-	-	53	17

Site Ref	Site Name	Delivery	CS Plan Period 2013-2028		
			0-5 Years	6-10 Years	11-15 Years
			2013- 2018	2018- 2023	2023- 2028
Total	-	-	2	53	17

Adjacent Hucknall

Key:	With Extant Planning Permission (as at 1 April 2014)
	Planning Permission Pending Consideration
	Lapsed / Withdrawn/ Refused Permission
	Not Allocated & with No Planning Permission
	Under Construction/ Implemented Planning Permission
	2004 Local Plan Residential Allocation
	2004 Local Plan Employment Allocation
	Core Strategy Strategic Site/Location for growth

Site Ref	Site Name	Delivery	CS Plan Period 2013-2028		
			0-5 Years	6-10 Years	11-15 Years
			2013- 2018	2018- 2023	2023- 2028
513	Land Belonging To Stubbing Wood Farm Watnall Road Watnall	Could be suitable if policy changes	-	39	27
251	Near The Common, Hucknall (field 9758)	Non Deliverable or Developable	-	-	-
Sub Total	-	-	-	39	27
Total	-	-	-	39	27

7. Five year supply

Introduction:

The ability to demonstrate a 5 year housing land supply is necessary to ensure that Core Strategy Housing targets are met and that policies within the Core Strategy are given full weight when appeals are lodged.

National Policy

Paragraphs' 47 – 49 of The National Planning Policy Framework (NPPF) states that;

- 47 "To boost significantly the supply of housing, local planning authorities should:
 - use 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 consistent with the policies set out in this Framework, including identifying key sites which are critical to the delivery of the housing strategy over the plan period;
 - identify and update annually a supply of specific deliverable sites sufficient to provide five years worth of housing against their housing requirements with an additional buffer of 5% (moved forward from later in the plan period) to ensure choice and competition in the market for land. Where there has been a record of persistent under delivery of housing, local planning authorities should increase the 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;
 - identify a supply of specific, developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15; for market and affordable housing, illustrate the expected rate of housing delivery through a housing trajectory for the plan period and set out a housing implementation strategy for the full range of housing describing how they will maintain delivery of a five-year supply of housing land to meet their housing target; and
 - set out their own approach to housing density to reflect local circumstances.
- 48 Local planning authorities may make an allowance for windfall sites in the five-year supply if they have compelling evidence that such sites have consistently become available in the local area and will continue to provide a reliable source of supply. Any allowance should be realistic having regard to the Strategic Housing Land Availability Assessment, historic windfall delivery rates and expected future trends, and should not include residential gardens.
- Housing applications should be considered in the context of the presumption in favour of sustainable development. Relevant policies for the supply of housing should not be considered up-to-date if the local planning authority cannot demonstrate a five-year supply of deliverable housing sites".

Requirement

Key components of a five year supply

The housing requirement has two aspects; the base requirement (in an up to date local plan) and any necessary additions to it. The additions will amount to applying a 'buffer' as required by the NPPF and any shortfall based on previous years of under-delivery. These are explained below.

The Base Requirement

The advice is in paragraph 30 of the National Planning Practice Guidance (NPPG) states that;

"Housing requirements in up to date local plans should be used as the starting point for calculating the five year supply. Considerable weight should be given to the housing requirement figures in adopted local plans, which have successfully passed through the examination process, unless significant new evidence comes to light".

The Housing Market Area (HMA) base requirement

Broxtowe is part of the Nottingham HMA (in the Regional Plan this is referred to as the Nottingham Core HMA) which in addition to Broxtowe comprises the full administrative areas of Erewash, Gedling, Nottingham and Rushcliffe. The Broxtowe Core Strategy was adopted in September 2014 and its housing requirement was examined post NPPF as part of the Greater Nottingham Aligned Core Strategies (ACS) that comprise Broxtowe, Gedling and Nottingham. The ACS was published in June 2012 and submitted for examination in June 2013. At paragraph 4.33 (page 17) of the Housing Background paper (CD/BACK/01) to support the ACS examination is was reported that;

"The objectively assessed housing need of the HMA, taking account of the economic aspirations of the Core Strategies, is 49,950 between 2011 and 2028".

The Erewash and Rushcliffe Core Strategies were submitted separately but the housing need evidence on which all HMA Core Strategies rely (and summarised above) was prepared jointly across the HMA.

The Broxtowe base requirement

There are now Core Strategies in place across the HMA which in combination contain policies to meet this objectively assessed housing need in full between the years 2011 to 2028. This is shown with required dwelling numbers below-

Broxtowe 6,150 Erewash 6,250 Gedling 7,250 Nottingham 17,150 Rushcliffe 13,150 Total **49,950**

The soundness of this provision and distribution was accepted by the Erewash Core Strategy Inspector who issued his <u>report</u> in January 2014, by the Broxtowe, Gedling and Nottingham Aligned Core Strategies Inspector who issued her <u>report</u> in July 2014 and by the same Inspector in relation to Rushcliffe who issued her report in December 2014 (<u>report</u>). Four of these Core Strategies are now adopted with Rushcliffe expected to do so in December 2014.

The shared strategy of all five HMA Councils is urban concentration with regeneration. This spatial strategy seeks to maximise the delivery of previously developed urban sites, many of which are in need of regeneration with the associated difficulty and cost in bringing such sites forward, and also recognises the most strategically significant part of the Green Belt is between Derby and Nottingham. It is for these main reasons that the distribution of development includes lower figures in Broxtowe and Erewash when compared to others in the HMA and the chronological order in which development takes place in all three ACS Councils and Rushcliffe is lower in the early years and higher later on to catch up. This allows for the longer lead in time it will take for problems associated with large urban sites to be resolved, minimises unnecessary amendments to Green Belt boundaries and is shown in the table below which appears in Policy 2 of the ACS.

Table 15 Core Strategy Policy 2 Housing Distribution

	2011 to 2028	2011 to 2013	2013 to 2018	2018 to 2023	2023 to 2028
Broxtowe Borough Council	6,150	200	1,800	2,150	2,000
Gedling Borough Council	7,250	500	2,200	2,400	2,150
Nottingham City Council	17,150	950	4,400	5,950	5,850
Total	30,550	1,650	8,400	10,500	10,000
All years are financial years, April to March. Numbers rounded to the nearest 50.					

The issue of whether lower housing numbers early in the plan and higher ones later amounts to an NPPF compliant approach was debated at length during the ACS examination. The Inspector concluded that it was and as a result of this a Main Modification was made to the ACS to explain in more detail the implications of having a flat (or even) housing trajectory across the whole plan period. This Main Modification comprises the seven bullet points and additional text in paragraph 3.2.10 of the ACS as now adopted.

The time frame of this five year housing land supply report is 1 April 2015 - 31 March 2020 in accordance with advice from previous government guidance which has the advantage of giving a full five years against which to measure supply. It is therefore based on known completions data for the period 1 April 2011 to 31 March 2014 and incorporates an assumption for the number of dwellings which will be delivered between 1 April 2014 and 31 March 2015. The 5 years for which the supply is calculated is from 1^{st} April 2015 to 31^{st} March 2020^{11} . The base requirement for these years is (360 x3) + (430 x 2) = 1940.

Addition to the base requirement (5% or 20% buffer)

A buffer of either 5% or 20% will always be required. The requirement is contained in the second bullet of paragraph 47 of the NPPF and necessitates either the additional buffer of 5% '(moved forward from later in the plan period) to ensure choice and competition in the market for land' or, where there has been a record of 'persistent under-delivery' again moved forward from later in the plan period not only to achieve choice and completion, but to 'provide a realistic prospect of achieving the planned supply'.

Paragraph 035 of the NPPG states-

"The approach to identifying a record of persistent under delivery of housing involves questions of judgment for the decision maker in order to determine whether or not a particular degree of under delivery of housing triggers the requirement to bring forward an additional supply of housing.

The factors behind persistent under delivery may vary from place to place and. Therefore, there can be no universally applicable test or definition of the term. It is legitimate to consider a range of issues, such as the effect of imposed housing moratoriums and the delivery rate before and after any such moratoriums.

¹¹ Please note that the 5 year supply timescale does not correspond to the 5 year timeslots set out in the Core Strategy and the SHLAA which are years from expected adoption (i.e. 2013 -14 monitoring year). The snapshot for assessing the sites was taken on 1st September 2014.

The assessment of a local delivery record is likely to be robust if a longer term view is taken, since this is likely to take account of the peaks and troughs of the housing market cycle...'

It is necessary therefore to look back over previous years at Broxtowe to consider whether any under-delivery in the provision of housing is persistent.

It is acknowledged that emerging plans take some time from their draft stage to adoption and nearly always have a 'start date' of several years before they were adopted. The table below shows housing delivery as measured against the most recently adopted development plan available at each year in question (2004 – 2014). The figures in bold represent the most recently adopted development plan available at the time.

Table 16 housing delivery measured against most recently adopted housing requirement

Year	1996	2006 Joint	2009 Regional	2014 Aligned	Net
	Structure Plan	Structure Plan	Plan	Core Strategy	Completions
	Review / 2004	requirement	requirement	requirement	
	Broxtowe				
	Local Plan ¹²				
	requirement				
2004/5	275	210	340		315
2005/6	275	210	340		381
2006/7	275	210	340		367
2007/8	275	210	340		376
2008/9	275	210	340		268
2009/10	275	210	340		95
2010/11	275	210	340		222
2011/12	275	210	340	140	140
2012/13	275	210	340	60	67
2013/14	275	210	340	360	150
Total	2750	2100	3400		2381

In the most recent large housing site appeal decision for Broxtowe (Hempshill Hall), taken in January 2014, the Inspector concluded that;

"Levels of housing delivery within the Borough have been below the level of 340 since 2008/9. However immediately before the recession they had been in excess of that figure. Thus ... the performance in better times shows that this should not be taken as indicating a pattern of persistent under delivery. On that basis, I consider that the requirement should include a buffer of 5%".

The above appeal was allowed prior to the receipt of the Core Strategy Inspectors report in which she endorsed the delivery requirements in Policy 2, and the Field Farm application was still pending a decision (which has now been granted). Nevertheless the stance of the Appeal Inspector in terms of applying a 5% buffer is consistent with advice from the Planning Inspectorate 13 which is that Councils should prepare supporting evidence to demonstrate that they have not persistently under delivered against past plans. The evidence could take reasonable account of macro-economic factors where housing delivery might have experienced an understandable drop/trough but where housing land has been available. It was suggested that councils review delivery against relevant plans over the past 8-10 years. Evidence of delivery can

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¹² Plan adopted August 2004

¹³ PINS soundness advice visit to the Greater Nottingham Councils, August 2012, Inspector Keith Holland.

be put in the context of having suitable available sites but where delivery has not occurred due to market conditions (see tables 16 and 17).

Table 17 shows the number of sites available during the years most affected by recession between 2009/10 and 2013/14

2004 Local Plan	Number of	Status of site			of dwellings	Year first	Phase
Residential Allocation	dwellings allocated		grante		tanticipated through SHLAA	allocated for housing	
H1(d) South of Queens Road/Site of Maltings, Dovecote Lane, Beeston	229	Part developed (04/00900/FUL) – complete 2009/10 Malting building on remaining part of site demolished early 2012	146	146	56	2004	1
H1(f) Field Lane, Chilwell	50	Still available	-	0	34	1994	1
H1(g) West of Church Street, Eastwood	24	Planning application currently pending (14/00415/FUL)	22	0	22	2004	2
H1(h) Walker Street, Eastwood	132	Planning application currently pending (13/00784/FUL)	140	0	140	2004	1
H1(i) Halls Lane, Giltbrook	88	Planning permission granted November 2009 – site complete 2012/13 monitoring year	88	88	N/A	2004	2
H1(j) Dyers & Cleaners site, Hampden Street, Giltbrook	50	Revised scheme granted permission 2010 – site complete 2011/12 monitoring year.	57	57	N/A	2004	1
H1(k) South of Smithurst Road, Giltbrook	92	Planning permission granted 2010 – currently pending for removal/variation of conditions	91	0	91	1994	2
H1(I) Builders' yard north of Eastwood Road, Kimberley	22	Still available	-	0	22	1994	1
H1(m) South of Eastwood Road, Kimberley	40	Still available	-	0	40	2004	2
H1(n) North-west of Hardy Close, Kimberley	25	Planning permission granted 2013 (12/00574/FUL) - currently pending for removal/variation of conditions	22	0	25	2004	2
H1(o) Chewton Street (fringe of former landfill site), Newthorpe	320	Still available	-	0	0	2004	2
H1(p) East of Pinfold Road, Newthorpe	22	Planning permission granted 2014	20	0	20	2004	2

This shows that there were sites available during these years on which 1094 dwellings could be constructed (allocated figure). Even when taking account completions, more recent information on densities, difficulty in delivery, housing sub market information and site specific constraints the assessed remaining delivery figures on these site is 450. Taking either of these figures there was an extensive supply of housing that was available for development. This supply was made available in September 2007 when a moratorium on the delivery of these 'phase 2 sites' was lifted. It highly likely that without this moratorium which was in place from the Adoption of the Broxtowe Local Plan in August 2004 until the lifting of the moratorium in September 2007, delivery could well have been higher in these economic boom times. Once the moratorium was lifted there was not time to bring these sites forward for development before the recession hit, but the table above is a very graphic illustration that these sites are fundamentally deliverable ones that are coming forward for development now as the economy improves.

This supports the conclusion of GL Hearn who have reviewed the trajectories of all three aligned Councils in the June 2012 publication version of the Core Strategy as reported in the Housing Market and Economic Prospects paper to support the Core Strategy, and in the case of Broxtowe they conclude that there should be some confidence in the ability to deliver the trajectory. They also point out at paragraph 3.111 of their report that

"A key issue for this report is the how this will play through into housing delivery. There is a strong correlation between the reduction in overall sales volumes and the reductions in house building. Given that in most areas new-build sales are less than 10% of overall sales in a given period, it is clear that **effective market demand for housing needs to improve to stimulate an increase in house building rather than an increase in land supply.** This is not to say that there is some potential benefit of improving land supply (looking regionally or nationally), but this alone is unlikely to result in a meaningful improvement in housing delivery"

This is important evidence in terms of the required buffer. A key distinction between the application of a 5% or 20% buffer is the use of a 20% buffer to 'provide a realistic prospect of achieving the planned supply'. The housing requirement figures at 360 per annum in the first five years of the Core Strategy period are the highest figures that have ever been in place in Broxtowe and these are to rise significantly to 430 starting in the 2018/19 monitoring year. In order to achieve these rates of delivery large scale strategic sites are required and the Core Strategy makes provision for the delivery of these sites at Boots/ Severn Trent, Toton, and Field Farm. There is compelling evidence that the delivery of these sites in combination takes some time, with the previously developed site at Boots taking longer to build out then Field Farm and Toton, and that the release of additional sites will not lead to increase in delivery in the short term. In evidence submitted to the February hearing sessions for the Core Strategy (CD/EX/48) it was acknowledged that a Core Strategy proposal to allocate part of the Toton Strategic Location for Growth, including a minimum of 500 homes would make the site available for housing more quickly, this would only have a marginally beneficial impact on the overall delivery of housing in Broxtowe Borough. This is explained in more detail in the summary of evidence provided in appendix 14 of CD/EX/48 (see above link).

There is no prospect that the application of a buffer any higher than 5% is necessary or would amount to a 'realistic prospect of achieving the planned supply.' In terms of the required buffer Broxtowe remains a 5% uplift authority which is consistent with previous appeal decisions in Broxtowe, the advice of the Planning Inspectorate and the evidence from GL Hearn to support the Core Strategy.

Addition to the base requirement (applying any shortfall)

In circumstances where a shortfall against housing requirements has built up this needs to be applied two ways which are commonly referred to as the Liverpool or Sedgefield approach. The Liverpool Approach spreads any shortfall in supply over the remainder of the plan period which in Broxtowe this would be to 2028. The Sedgefield approach seeks to meet any identified shortfall in full in the five year supply period which would be in the five years from 2015 to 2020, this is shown below.

Table 18: Shortfall against Aligned Core Strategy requirement - Liverpool & Sedgefield

Year	Housing Target	Completions
2011/12	140	140
2012/13	60	67
2013/14	360	150
2014/15	360	230
Shortfall =		-333
2015/16	360	
2016/17	360	
2017/18	360	1940
2018/19	430	
2019/20	430	
5 Year Base Requ	1940	
Base Requiremen	1940+128 = 2068	
Base Requiremen	1940+333 = 2273	

This suitability of the Liverpool approach was ruled on in a recent high court decision by Lindblom J in Bloor Homes East Midlands Limited v Secretary of State for Communities and Local Government and Hinckley and Bosworth Borough Council . On Ground 2 one of the sub-issues that arose was "the inspector's choice of the Liverpool method, rather than the Sedgefield, for calculating the supply of housing land, despite the appeal decisions presented in evidence at the inquiry, in which the Sedgefield method had been preferred". The following is a summary extract from paragraphs 107-113 of the judgement;

"Both methods [Liverpool and Sedgefield] were well established as means of assessing the supply of housing land....[The inspector] had evidence from either side urging him to accept one method or the other...Neither method is prescribed, or said to be preferable to the other, in government policy in the NPPF. In my view the inspector was free to come to his own judgment on this question.

[The Inspector] referred to the essential characteristics of each method...the Liverpool method spreads any shortfall in supply in a given year over the remainder of the plan period, and is an appropriate method to adopt where there is not a severe shortage in supply. ... The Sedgefield approach as one that seeks to meet any shortfall earlier in the plan period. [The Inspector]... acknowledged Bloor's assertion that this approach accords with the imperative of significantly boosting the supply of housing, stated in paragraph 47 of the NPPF.

...The inspector understood the essential differences between the two approaches and was able to reach his own view on the method that was more appropriate in the circumstances of this case.

...The inspector plainly took the view that, in the circumstances of this case at the time of his decision, the Liverpool method was the better way to establish what the level of supply really was.

The inspector gave significant weight to the core strategy inspector's relevant conclusions, and, in particular, to his expectation that shortfalls in housing land supply in the early years of the core strategy period would later be overcome when the Sustainable Urban Extensions were developed.

...[The Inspector] noted the progress that had been made with the Sustainable Urban Extensions ... And he expressly dealt with Bloor's contention that the core strategy inspector's conclusions were based on a promise that had now proved to be false – that sites would swiftly be brought forward by way of allocations in the Site Allocations DPD, which had now been delayed...

The inspector explained why he shared the view of the core strategy inspector about early shortfalls in supply being corrected by large-scale housing development later in the core strategy period. He plainly had in mind the policy in paragraph 47 of the NPPF, which is cast in terms of a need "[to] boost significantly the supply of housing" and says that authorities should "use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs" for housing in the relevant area, and identify a supply of sites "sufficient for provide five years' worth of housing against their housing requirements ...". ... Having set out the considerations weighing for and against either approach, the inspector went on ... to conclude that the Liverpool method provided "a reasonable basis for assessing future supply". It was, in his opinion, a method congruent with the approach in the core strategy, and consistent with the aim of fulfilling the housing requirements identified there. That was a matter of judgment for him."

It is the case that the claim was successful but this was completely unrelated to the Inspectors use of the Liverpool method but instead was to do with the judge's ruling that the Inspector had failed to deal with an argument made by Bloor on the need to make a 10% discount from the notional delivery of housing on larger sites. This was important as the Inspector determined the 5 year supply to be 5.02 years and it would have fallen below this were such a 10% reduction applied.

It is also acknowledged that the NPPG does now express a preference for the Sedgefield approach but does not preclude Liverpool. The circumstances surrounding the Groby case in Hinckley & Bosworth described above are very similar to the shared HMA strategy of urban concentration with regeneration across the Nottingham HMA. In Broxtowe as in Hinckley this required large SUE scale housing sites to deliver the planned supply which will take several years into the plan period to deliver, with some such as Boots not expected to commence delivery until the 2018 /19 monitoring year. In these circumstances to apply the Sedgefield method would be ignore this adopted strategy and would put significant additional pressure on the release of sites form the Green Belt, as Broxtowe are already taking all necessary steps to increase the amount and speed of urban supply as explained on page 15 above.

In circumstances such as these, the principle of both having a staggered trajectory instead of a flat one as well as rectifying any shortfall in housing supply over the full plan period are both well established and fully NPPF compliant. This is a similar approach to that taken in three recently examined Core Strategies with the details in appendix 15 of CD/EX/48.

The remaining issue to resolve is whether the shortfall is applied before or after the buffer. Paragraph 47 of the NPPF refers to the buffer being 'moved forwards from later in the plan period' and to it being measured 'against their housing requirements'. This clearly indicates that the addition of a percentage buffer needs to be taken against the Core Strategy figures before any shortfall is added.

The total housing requirement for the 5 years 2015 – 2020 is shown in table 19 below:

Table 19: Summary of the housing requirement:

Requirement	1940 ((360 x 3) + (430 x 2))
Addition to it (5% buffer)	2037 (1940 x 1.05)
Application of shortfall using Liverpool method	128 ((333/13) x 5)
Total Requirement	2165

Supply

To be included in the 5 year supply a site must be 'deliverable', footnote 11 of the NPPF defines 'deliverable' as:

"To be considered deliverable, sites should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years and in particular that development of the site is viable. Sites with planning permission should be considered deliverable until permission expires, unless there is clear evidence that schemes will not be implemented within five years, for example they will not be viable, there is no longer a demand for the type of units or sites have long term phasing plans".

All sites in the five year housing land supply assessment have been identified through the Council's Strategic Housing Land Availability Assessment (SHLAA) database. In the majority of cases for large sites, anticipated completion timescales and rates are as provided by the developer/agent/landowner. Where this information has not been provided, then judgements have been made based on the viability of a site's location as identified in the Three Dragons report, the conclusions of the GL Hearn report, recent rates of housing delivery in the settlement in question and officers' own local knowledge.

Table 20: Sites 'planning status' counted in the 5 years supply.

Site Status	Awsworth	Brinsley	Eastwood	Kimberley	MBA	Other
Dwellings on sites with Implemented	77	1	52	1	1	-
Permission						
Dwellings on sites with Extant Planning	-	3	124	40	382	1
Permission (non-strategic sites)						
Dwellings on sites with Planning Permission	20	-	232	97	367	-
Pending						
Dwellings on sites Allocated in 2004 Local Plan	-	-	-	-	-	-
Dwellings on sites where principle of	-	-	30	16		-
development acceptable						
Dwellings on site with Planning Permission	-	-	-	-	450	-
and Allocated in Core Strategy (Field Farm)						
Dwellings on site with Planning Permission	-	-	-	-	160	-
and Strategic Location for Growth in Core						
Strategy (Boots/Severn Trent)						
Dwellings on site with Permission Pending and	-	-	-	-	370	
Strategic Location for Growth in Core Strategy						
(Toton)						
Total	97	4	438	154	1730	1

Realistic assumptions have been made as to a sites ability to deliver in the 5 years supply in order to have a robust evidence base. The 5 year supply consists of;

- Sites that are currently under construction:
- Sites that have extant planning permission;
- Sites that have planning applications pending consideration where it is considered that the
 principle of development is acceptable (either because the site was allocated for residential
 development in the 2004 Local Plan, permission has been granted subject to a S106 or
 where the applicant engaged in advanced pre-application advice).
- The Aligned Core Strategy allocated site¹⁴;

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¹⁴ The site at Field Farm has extant planning permission.

- The Aligned Core Strategy Strategic Location for Growth (both Boots/Seven Trent and Toton)
- Only two sites have been included where there is not extant permission but the principal of development is acceptable (land rear of Chilton Drive, Watnall and Land off Thorn Drive/West of the Pastures, Newthorpe).

Sites not included in the 5 year supply consist of;

- Outstanding 2004 Local Plan residential allocations where there is not a current planning application (which is either pending, implemented or extant).
- Sites where the planning permission has lapsed;
- Sites where a planning application has been refused (even when the principle of development is acceptable);
- Any site where there is an alternate use still in operation on the site;
- Sites that located in the Green Belt (other than the Strategic Location for Growth at Toton identified in Policy 2 of the Aligned Core Strategy) even where it is considered to 'be suitable if policy changes'

The assumptions on delivery are based upon predicted start dates and build out rates (which have previously been consulted on) and are consistent with evidence in the 'build rates' section of the SHLAA. It has not been an automatic assumption that sites that start delivering houses will complete in the 5 years in question. Of the sites included in the 5 year supply there is capacity for a further 795 dwellings, these are assessed to be built out beyond 2020 (i.e. not included in the 5 year supply).

There are a number of 2004 Local Plan residential allocations that have not been included in the 5 year supply (see list below). All of these sites are suitable for housing development and thus it is possible that they might deliver houses prior to 2020. However as previously explained a realistic but cautious approach to the 5 year land supply has been taken so as not to give an overly optimistic impression. These include

- Chewton Street Newthorpe (0)
- Builders Yard Eastwood Road Kimberley (22)
- South of Eastwood Road Kimberley (40)
- Field Lane Chilwell (34)
- Beeston Malting's Dovecote Lane (56)

The total dwelling number that these sites are expected to deliver is 152. This does not include any expected delivery for the site at Chewton Street Newthorpe given the 10 year time period from Allocation without any clear evidence that the site is deliverable.

The delivery timescales on all three Core Strategy strategic sites is consistent with the latest evidence from the respective agents promoting these sites or where necessary a more conservative estimate of delivery has been applied as described below.

Boots

Even allowing that planning permission has been granted a 2018 start is considered realistic but cautious given the site remediation and other work to undertake even allowing the availability of significant grant funding to expedite this Enterprise Zone site. Delivery timescales are reviewed by GL Hearn at paragraph 5.35 of their report and the 2018 start date is endorsed

Toton

The adopted Core Strategy requires consideration of this site to be undertaken by the Toton Advisory Committee and the site to be removed from the Green Belt as part of the Broxtowe part 2 local plan which is expected to be adopted in the current LDS by the end of 2015. This Main Modification to the Core Strategy was explicitly intended to improve the delivery this site would

make to housing numbers in the early years of the Core Strategy time period and at the time of the GL Hearn work there were no specific dwelling numbers to review at Toton. However, the HS2/Toton Advisory Committee and Cabinet considered a draft master-plan for the whole location at their meetings of 15th December and 16th December 2014. This included consideration of the minimum 500 homes to be provided in the manner suggested. A planning application in line with this emerging masterplan when agreed could be reported to Committee in the early part of 2015 and the agreed statement of common ground between Broxtowe and the promoters of the site to the west of Toton Lane indicate that the delivery rate as reported in this SHLAA is realistic with a start date of one year after planning permission is granted. The first completions on site in the 2016-17 year and delivery increasing to 135 a year from 2018-19 is therefore realistic.

Field Farm

The site now has planning permission and a build rate of 50 dwellings in the first year and 100 thereafter is contained in the Statement of Common Ground between Broxtowe and the applicants to inform the Core Strategy Examination. This delivery rate is realistic having regard to the significant progress in resolving obstacles to delivery as part of the planning application, the 'typical' build rates on large sites (as shown in table 9) and the progress in preparing a detailed planning application to deal with reserved matters to be submitted in the early part of 2015, First completions during 2015-16 followed by 100 completions a year thereafter are realistic with regard to this evidence.

The delivery of other smaller sites in the supply is robust with reference to the following points;

The geographical spread of sites in the supply,

Evidence from <u>Three Dragons</u> that the strongest housing submarket in Broxtowe in Beeston and evidence for GL Hearn when examining the Broxtowe trajectories in 2012 was that there does not appear to be an over-reliance on key sites and there should be some confidence in the ability to deliver the trajectory (paragraph 5.37). GL Hearn did identify some risk to delivery in Eastwood with an overall housing requirement of 1,400 dwellings and a significant contribution to the five year supply (at the time) of around 140 homes a year between 2013 and 2016.

This evidence has been carefully considered. As a result a Main Modification to the Core Strategy was submitted and agreed by the Inspector that housing requirements in the Main Built up area of Nottingham (mainly the Beeston sub market) is increased from 3,600 dwellings to 3,800, and that delivery in the weaker submarkets of Eastwood and Brinsley are reduced by 150 and 50 homes respectively to 1,250 and 150. In addition assumptions regarding site delivery have been reduced in Eastwood given the identified risks that GL Hearn identify and subsequently increased in the main built up area of Nottingham as shown in the table below.

Table 21: Change in delivery assumptions over time between Main Built up Area and Eastwood

Date	Number of Dwellings in the 5 year supply			
	Main Built up Area	Eastwood		
2012 (Published Core Strategy)	348	584		
2013 (March)	405	539		
2013 (September)	564	507		
2014 (September)	1730	438		

There is also not any over-reliance on Previously Developed sites with 1428 of the housing numbers in the 5 year supply on Greenfield sites. The list of specific sites is shown in table 22.

Table 22: Specific deliverable sites counted in the 5 year land supply

SHLAA Site Reference	Site Name	Status	Settlement	Number of Dwellings 2015- 2020	Number of dwellings on site post 2020
35	Land off Main Street Awsworth	Under Construction	Awsworth	12	-
36	Ponderosa Gin Close Way Awsworth	Under Construction	Awsworth	10	-
136	East of Main Street Awsworth	PCO ¹⁵	Awsworth	20	-
564	Land At Gin Close Way Awsworth	Under Construction	Awsworth	55	-
53	Manor Farm, Hall Lane, Brinsley	Extant ¹⁶	Brinsley	2	-
81	Oak Tree Cottage, 26-28 Cordy Lane, Brinsley	Under Construction	Brinsley	1	-
8	36 Main Street Brinsley	Extant	Brinsley	1	-
27	246 Main Street Newthorpe	Under Construction	Eastwood	2	-
34	Land off Acorn Avenue Giltbrook	Under Construction	Eastwood	50	10
43	Land at 19 Mill Road Newthorpe	Extant	Eastwood	1	-
82	D R Construction 35 - 37 Barber Street Eastwood	Extant	Eastwood	2	-
125	Land at Church Street Eastwood	PCO (granted subject to S106)	Eastwood	22	-
138	Walker Street Eastwood	PCO	Eastwood	140	-
143	South of Smithurst Road Giltbrook	Extant	Eastwood	91	-
147	East of Pinfold Road Newthorpe	Extant	Eastwood	20	-
272	Car Park Cross Street Eastwood	Extant	Eastwood	2	-
519	Land Off Thorn Drive And West Of The Pastures Thorn Drive Newthorpe	WD ¹⁷	Eastwood	30	3
554	16 Derby Road Eastwood	Extant	Eastwood	1	-
581	32 Mansfield Road Eastwood	Extant	Eastwood	1	-
608	Methodist Church Newthorpe Common Newthorpe	Extant	Eastwood	5	-
618	31A Nottingham Road Eastwood	Extant	Eastwood	1	-
624	22 Brookhill Leys Road Eastwood	Extant	Eastwood	1	-
134	Springbank Primary School Devonshire Drive Eastwood	Extant	Eastwood	29	-
521	Beamlight Automotive Seating Ltd Tricom House Newmanleys Road Eastwood	PCO (granted subject to S106)	Eastwood	40	225
576	Electricity Substation James Street Kimberley	Extant	Kimberley	1	-
599	2, 4 & 6 Oak Lodge Drive Kimberley	Extant	Kimberley	5	-
611	Rear Of 140 Main Road Watnall	Under Construction	Kimberley	1	-
613	95 Kimberley Road Nuthall	Extant	Kimberley	1	-
619	4 and 6 Hardy Street Kimberley	Extant	Kimberley	2	-
621	Nottinghamshire Police Kimberley Police Station Church Hill Kimberley	Extant	Kimberley	3	-
622	73 Main Street Kimberley	Extant	Kimberley	2	-
623	Ex Servicemens Club Station Road Kimberley	Extant	Kimberley	2	-
14	Land adj Elm Farm Trough Lane Watnall	Extant	Kimberley	1	-
145	Land Between 3 And 12 Hardy Close Kimberley	Extant	Kimberley	22	-

¹⁵ PCO = Planning Application Pending Consideration

¹⁶ Extant Planning Permission

¹⁷ WD = Withdrawn Planning Application

428	Land To Rear Of Chilton Drive Watnall	Pre-Application 18	Kimberley	16	_
586	Hardy And Hansons Plc Kimberley Brewery Hardy Street Kimberley	PCO (granted subject to S106)	Kimberley	97	45
606	Land adjacent 59 Gilt Hill Kimberley	Extant	Kimberley	1	-
10	25 Wadsworth Road Stapleford	Extant	MBA	1	-
12	Moults Yard, 68-70 Nottingham Road, Stapleford	PCO	МВА	15	-
24	3 The Jardines Bramcote	Extant	MBA	1	-
38	61 High Road Beeston	Extant	MBA	2	-
51	Units 12-15 Pinfold Trading Estate Nottingham Road Stapleford	PCO (granted subject to S106)	МВА	50	-
95	Allotments, Hassocks Lane, Beeston	Extant	MBA	130	-
108	Field Farm Land north of Ilkeston Road Stapleford	Extant	МВА	450	-
170	1 Fletcher Road Beeston	Extant	MBA	1	-
176	34 Church Street Stapleford	Extant	MBA	3	-
184	40C Derby Road Beeston	Under Construction	MBA	1	-
187	55-57 Carrfield Avenue Toton	Extant	MBA	6	-
220	Land East of Low Wood Road Nuthall	Extant	MBA	87	29
297	Hofton's Roberts Yard Beeston	Extant	MBA	6	-
350	52 Nottingham Road Stapleford	Extant	MBA	4	-
373	Land To Rear 58 Temple Drive, Nuthall	Extant	MBA	1	-
406	Land Adjacent The Grange, Town St, Bramcote	Extant	MBA	1	-
408	Myford Machine Tools Wilmot Lane Beeston	PCO (granted subject to \$106)	MBA	64	17
458	Wyndham Court Field Lane Chilwell	Extant	MBA	13	-
460	Peatfield Court Peatfield Road Stapleford	Extant	MBA	20	-
498	1 Burnham Avenue Chilwell	Extant	MBA	1	-
499	Beeston Business Park Technology Drive Beeston	PCO (granted subject to \$106)	МВА	189	96
502	61 Marton Road Chilwell	Extant	MBA	1	-
509	Trowell Freight Depot Stapleford Road Trowell	Extant	МВА	33	-
516	Barrydale Avenue Beeston	Extant	MBA	3	-
541	Chilwell Methodist Church Clarkes Lane Chilwell	Extant	МВА	2	-
543	Inham Nook Methodist Church Pearson Avenue Chilwell	PCO	МВА	24	-
552	6 Bessell Lane Stapleford	Extant	MBA	1	-
555	40 Broadgate Beeston	Extant	MBA	1	-
567	201 - 209 Queens Road Beeston	Extant	MBA	3	-
574	Land Rear of 89 Inham Road Chilwell	PCO	MBA	7	-
585	61 Hall Drive Chilwell	Extant	MBA	1	-
587	242-254 Derby Road Stapleford	Extant	MBA	6	-
589	84 Broadgate Beeston	PCO	MBA	12	-
591	Castle College Middle Street Centre 10 Middle Street Beeston	Extant	МВА	17	_
594	Land Adjacent To Manor Court House 1 Manor Court Peache Way Bramcote	Extant	MBA	1	-
595	2 - 4 Derby Road Stapleford	Extant	MBA	4	-
600	Garages Midland Avenue Stapleford	Extant	MBA	4	-

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¹⁸ Pre-application advice

605	69 Derby Road Bramcote	Extant	MBA	4	-
607	Land to South Shirley Court Norfolk Avenue Toton	Extant	МВА	1	-
609	221 Pasture Road Stapleford	Extant	MBA	1	-
612	54 Hickings Lane Stapleford	Extant	MBA	1	-
614	Land To Rear Of 98 Church Street Stapleford	PCO	МВА	6	-
96	184 Station Road Beeston	Extant	MBA	6	-
237	The Boots Company Beeston site	PCO (granted subject to S106)	МВА	160	240
239	Works Bailey Street Stapleford	Extant	MBA	15	-
133	Land at Toton Lane Stapleford	PCO	MBA	370	130
154	Marsh Farm Church Lane Cossall	Extant	Other rural	1	-
	TOTAL			2424	795

Discount

There is no requirement in the NPPF or NPPG to apply a discount to the supply of deliverable sites (i.e. an assumption that a proportion of the sites in the 5 year supply will not be delivered). The Hinckley Court Judgement referred to earlier resulted in the Inspectors decision being quashed solely on the lack of consideration of an appropriate buffer, therefore a pragmatic approach to applying a discount has been taken. Evidence (from 2009 onwards) shows that on average 10% of permissions granted for dwellings are not implemented (i.e. lapse). Whilst the evidence has been gathered during recession (and it is considered that during economic boom times that the lapse rate would be much lower) a discount rate of 10% has been applied on all unimplemented sites in the supply with planning permission to ensure the supply is robust.

Windfalls

The NPPF states that;

"Local planning authorities may make an allowance for windfall sites in the five-year supply if they have compelling evidence that such sites have consistently become available in the local area and will continue to provide a reliable source of supply. Any allowance should be realistic having regard to the Strategic Housing Land Availability Assessment, historic windfall delivery rates and expected future trends, and should not include residential gardens".

<u>Table 23: Average net windfall completion rate on small sites (excluding garden land) since</u> 2009/10.

Year	Net Windfall completions on small sites (excluding gardens)
2009-10	36
2010-11	62
2011-12	23
2012-13	23
2013-14	37
Total	181

With regards to the inclusion of a windfall allowance in the 5 years supply, using the same methodology as described above, the Hempshill Hall Inspector concluded that;

"Given the high levels of provision on windfall sites in previous years, and having regard to the advice at paragraph 48 of the Framework, this seems to be a reasonable approach".

Conclusion

The requirement from 1st April 2015 to 31st March 2020 (taken from the adopted Core Strategy) is 1940 dwellings ((360 x 3) + (430 x 2)). First added to this is a buffer of 5% which would take the requirement up to 2037 dwellings (1940 x 1.05) for the respective period. In addition a shortfall of 128 dwellings also needs to be included in the requirement ((333/13) x 5) taking the sum total of the requirement for 1st April 2015 to 31st March 2020 to **2165**.

The supply for the same period (i.e. the number of dwellings on specific deliverable sites) is 2424. A 10% discount rate has been applied to all sites with extant planning permission that have not been implemented which takes the figure down to 2308 (2424 – 116). A windfall allowance of 181 was then added taking the sum total for the supply for 1st April 2015 to 31st March 2020 to **2489**.

Therefore Broxtowe has a supply of $((2489/2165) \times 5) = 5.7$ years.

Performance against Core Strategy Housing Trajectory

