

Broxtowe Borough Council
Erewash Borough Council
Gedling Borough Council
Nottingham City Council

Housing Background Paper June 2012



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Content

- 1. Introduction**
- 2. Outline of strategy**
- 3. Past Housing Delivery**
- 4. Policy background**
- 5. Housing Provision for Greater Nottingham**
- 6. Affordable Housing**
- 7. Conclusions**

Appendix A - Trajectories for Greater Nottingham Districts

1 Introduction

Scope of Paper

1.1 This Background Paper has been prepared to support the Broxtowe, Gedling and Nottingham City Aligned Core Strategies, and the Erewash Core Strategy (which is aligned in all respects except timing). However, it covers the whole of the Nottingham Core Housing Market Area (HMA), which includes Rushcliffe Borough Council. Rushcliffe have already published a Core Strategy based on a different housing provision methodology, but which is aligned in all other respects (albeit with an end date of 2026 rather than 2028).

1.2 The Hucknall part of Ashfield District Council is not included. Ashfield District is not part of the Nottingham Core HMA¹, although Hucknall is included in the definition of Greater Nottingham. Ashfield agreed its proposed housing provision at a Cabinet meeting on 22nd March 2012 to be included in a future Local Plan for its area. For Hucknall this is 2,284 new homes 2010 to 2023. This equates to 176 homes per year, the same as the provision derived from the Regional Plan. Given the variation in the plan period, the uncertainty of Ashfield's housing provision post 2023, and the different HMA, it is not considered practical to make comparisons including Hucknall within this paper. However, the general findings of this paper are considered to be sound, because the housing provision is consistent up until 2023 with the approach taken in Broxtowe, Erewash, Gedling and Nottingham City, and the Hucknall part of the wider Greater Nottingham housing provision (taken from the 'Option for Consultation' version of the Aligned Core strategies, 2010) was only 5.7% of the total.

1.3 This Background Paper was prepared after consultation on the Housing Provision Position Paper (HPPP) in summer 2011. It describes work subsequently undertaken by Broxtowe, Erewash, Gedling and Nottingham City Councils (although it includes the Rushcliffe area). This subsequent work has re-rescaled the headship rates used in the government's 2008-based Household Projections, so the two papers are not directly comparable.

1.4 The purpose of the HPPP was to assist decision makers and others with an interest in the Core Strategy process to understand what the implications of different levels of housing provision would be in terms of the population, migration, the economy and house building rates.

1.5 The purpose of this Background Paper is to describe how the level of housing provision in the Greater Nottingham area has been arrived at, and to show that the housing provision included in the area's Core Strategies is considered to be the most appropriate level to plan for across the area.

¹ The District as a whole is part of the Nottingham (Outer) Housing Market Area, rather than the Nottingham Core Housing Market Area.

National Planning Policy

1.6 This paper has been produced within the context provided by the National Planning Policy Framework (NPPF) which was published on the 27th March 2012. The NPPF stresses that the purpose of the planning system is to contribute to sustainable development. The NPPF makes it clear that there are three dimensions to sustainable development: an economic role, a social role and an environmental role and that these should be integrated.

1.7 Within the context of the presumption in favour of development, the NPPF makes it clear that Government is committed to boosting significantly the supply of housing. In terms of drawing up plans local planning authorities should:

- use an evidence base to ensure the full objectively assessed needs for market and affordable housing are met, in so far as consistent with NPPF policies, including setting out sites which are critical to the delivery of the strategy;
- illustrate the expected rate of housing delivery through a housing trajectory;
- plan for a mix of housing based on current and future demographic trends, market trends and the needs of different groups in the community;
- identify the size, type, tenure, and range of housing required in particular locations, including affordable housing;
- Provide for the affordable housing needs of rural areas;
- The strategy should be deliverable, taking into account all the relevant development costs.

1.8 The NPPF includes an additional test of soundness - that is the plan should be positively prepared based on a strategy which seeks to meet objectively assessed development requirements. The other tests remain the same as those previously set out in PPS 12 "Local Spatial Planning" (now rescinded), and include the test most relevant to the evidence base - that plans should be justified and based on evidence that is proportionate to the task.

1.9 All the Councils in the HMA consider the requirements of National Planning Policy as it relates to housing provision have been met for the following reasons:

- Firstly, Broxtowe, Erewash, Gedling and Nottingham City Councils have considered the housing needs of the Housing Market Area through an objective assessment of available evidence, which has included commissioning further work on the latest government household projections, updating them to include local information (see section 4 and the Household Projections Background Paper, 2012).

- Secondly, the strategy and level of housing provision in the Core Strategies is considered to be aspirational, but realistic, assuming an early return to good housing market conditions. It is therefore effective and deliverable (see section 5).
- Thirdly, the Councils have worked in partnership across the housing market area, and the approach is based on joint working and cooperation to address wider strategic issues.
- Fourthly, the Councils consider the housing provision for the area is consistent with the economic aspirations of their Core Strategies (see the Employment Background Paper, 2012).

2 Outline of strategy

2.1 The spatial strategy flows from the spatial portrait, vision, and spatial objectives set out in the Broxtowe, Erewash, Gedling and Nottingham City Core Strategies. It is aspirational but realistic, and has been positively prepared to meet the objectively assessed development and infrastructure requirements of the area as set out here and elsewhere in the evidence base, notably the Employment Background Paper (2012) and the Household Projections Background Paper (2012).

2.2 A spatial strategy of urban concentration with regeneration was included in the Regional Spatial Strategy and this underpinned the early stages of Aligned Core Strategy preparation. The strategy envisages most development being accommodated in or adjoining the main built up area of Nottingham, with development of a lesser scale in or adjoining the Sub Regional Centres. It is still considered to be the most appropriate strategy for the area, both in the light of the significant regeneration challenges faced by parts of the plan area, especially in the main built up area of Nottingham itself, where many of the brownfield development opportunities lie, and in the Sub Regional Centres of Ilkeston (in Erewash), and Hucknall (in Ashfield, but adjoining the plan area). It is also considered to be the most sustainable strategy (and therefore the most appropriate in comparison with reasonable alternatives), as indicated through the Sustainability Appraisal process.

2.3 The Regional Plan was highly prescriptive with regard to the level of development in and adjoining the main built up area, and that to be provided elsewhere. The Core Strategies maintain the same strategic approach of urban concentration with regeneration, but are less prescriptive because they take account of the difficulties experienced in delivering some sites on which the Regional Plan relied, and the specific development needs and potential of other parts of the plan area. The Regional Plan's preparation also resulted in the prescriptive approach becoming less deliverable as it increased the proportion of development in and adjacent to the main urban area in an arbitrary way (see also paragraph 4.10 to 4.12).

2.4 The settlement hierarchy identified reflects the role and size of the urban areas, with Nottingham and its built up area being of national and regional importance in terms of its size and economy, and the two Sub Regional Centres of Hucknall (in Ashfield District) and Ilkeston (in Erewash Borough), which are relatively large and have their own distinct identities and economic roles. The Key Settlements have been locally defined, based on their role, function and planning policy considerations, particularly implications for the most important areas of Green Belt, especially those directly between Derby and Nottingham. The scale of development envisaged within or adjoining these Key Settlements varies, depending on a range of factors. These include local regeneration needs, the level of growth capable of being accommodated in or adjoining the main built up area of Nottingham or relevant Sub Regional Centre, and available sustainable development opportunities as identified in Strategic Housing Land Availability Assessments.

In other villages not named in the plan, development will be of a scale appropriate to meeting local needs.

2.5 The concentration of development in or adjoining the main built up area of Nottingham applies across the area, rather than to individual Council areas, so the proportion of growth in or adjoining the main built up area varies between the Councils.

2.6 Broxtowe, Gedling, Nottingham City and Rushcliffe Councils will be preparing site specific Development Plan Documents which will allocate non strategic sites to meet the housing figures and economic aspirations set out in their Core Strategies, whilst Erewash are intending to prepare a Local Plan for their area.

2.7 The western part of Erewash Borough Council abuts the built up area of Derby City. This part of the Borough is within the Derby-Nottingham Green Belt. Erewash anticipates meeting all its housing needs wholly on non Green Belt sites, and so no development is proposed adjoining Derby City.

Housing Provision

2.8 The housing provision between 2011 and 2028 for Broxtowe, Erewash Gedling and Nottingham City (which used the same methodology) is 36,800. Taking account of Rushcliffe's Core Strategy this equates to 41,600 to 2026². This level of housing provision is based on the Councils' objectively assessed evidence in this background paper (see also the Housing Projections Background Paper, 2012). It meets the needs of the existing population, whilst allowing for continuing in-migration to the area, albeit at a lower level than that experienced in the past. It also allows for a significant contribution towards affordable housing needs, and is sufficient to assist the considerable regeneration challenges present. It is phased on the basis of likely delivery timescales, taking into account infrastructure delivery and a recovering housing market. In addition, the housing provision level proposed takes account of what is considered to be deliverable over the plan period, and is accommodated on a mix of sites offering early housing delivery and sites which will require a longer lead in time.

2.9 The housing provision equates to that in the East Midlands Regional Plan, which required Greater Nottingham as a whole to provide a minimum of 60,600 new homes between 2006 and 2026. The Regional Plan figures have therefore been used as the basis of extending Broxtowe, Erewash Gedling and Nottingham City's plan periods to 2028, by adding two years of provision to the 2026 figures and subtracting the completions between 2006 and 2011, to give the housing provision figure of 36,800 for 2011 to 2028 as illustrated in section 5 below. Rushcliffe's plan runs to 2026.

² See the trajectories in Appendix A.

Housing Provision and Employment

2.10 In terms of employment, an increase of approximately 37,000 jobs is anticipated across Greater Nottingham over the plan period, to provide both for the needs of the projected increase in the labour force brought about by the proposed housing provision, and to reduce unemployment rates and increase the levels of economic activity in the working age population. More detail on this can be found in the Employment Background Paper (2012).

2.11 Due to some locally distinct factors within each of the Council areas, the detailed implementation of the broad spatial strategy has some variations across the plan area. These are set out below.

Broxtowe Borough

2.12 The majority of Broxtowe's housing provision is to be provided within or adjoining the main built up area of Greater Nottingham. This is fully in accordance with the strategy of urban concentration with regeneration and will focus housing delivery in or adjacent to the main built up areas in the south of Broxtowe. This will include delivery of housing together with employment development on the Boots/ Severn Trent site which will be assisted by the infrastructure planned to be put in place to support the development of the Enterprise Zone. Areas in the urban south of Broxtowe benefit from being in the strongest housing sub market, having the most comprehensive public transport links particularly to Nottingham and being in the greatest area of affordable housing need. This strategy therefore performs best in terms of deliverability, sustainability and meeting local housing needs.

2.13 However, the housing numbers and distribution also reflect a strong desire to see a broad mix of housing provided within the Broxtowe's boundaries to ensure sustainable settlements are able to expand to meet their growing needs at the same time as protecting the most strategically significant parts of the Green Belt, especially large open areas between Nottingham and Derby. Whilst the housing market has stalled in weaker housing sub markets such as Eastwood in recent economic times, there is no reason to suppose that further housing will not be provided here. Historic delivery has been good, housing need is high, and the area is supported by good access to local services, with Eastwood being the largest settlement with the widest ranges of services in Broxtowe outside of the Greater Nottingham urban area with a need to provide new local employment opportunities here.

2.14 The employment strategy will continue to protect and provide viable employment sites and premises to meet business needs in addition to the new jobs to be provided on the Enterprise Zone at the Boots campus. Although not a strategic site, the existing employment offer will also be enhanced at Beeston Business Park as a result of it being part of the Enterprise Zone. Many sites in Broxtowe have accessibility advantages being close to the M1 which make such sites attractive to the market. In terms of employment, Nottingham City has helped to provide much of the job needs of Broxtowe residents and the strategy will continue to support this relationship.

Erewash Borough

2.15 Erewash's housing provision is to be principally provided in and adjoining the Ilkeston urban area. This will be supported by a smaller housing number planned for the Long Eaton urban area, whilst development within the Borough's rural settlements will be restricted to within existing settlement boundaries to preserve the openness of the Green Belt.

2.16 This approach is consistent with the model of urban concentration with regeneration. It reflects the availability of land across Erewash, a significant development opportunity at the Stanton Regeneration Site, the ongoing need to regenerate Ilkeston and the existence of strategically important Green Belt between Nottingham and Derby. The latter acts as a severe limitation which restricts development opportunities outside the urban areas of Ilkeston and Long Eaton. The urban area of Long Eaton, forms part of the continuous built up area of Nottingham (the Nottingham Principal Urban Area). Development here over the Plan period, is proposed to meet the needs of the existing community, where opportunities exist. However, Long Eaton has relatively limited capacity to accommodate significant development due to a combination of constraints, including its proximity to the M1 motorway, the Green Belt boundary, the Trent floodplain and the adjacent Borough boundary with Broxtowe.

2.17 The Borough Council is strongly committed to the long-term regeneration of Ilkeston. The scale of development planned within and adjacent to the town will help to strengthen the case for sustainable transport improvements. This includes the re-establishment of a passenger railway station serving Ilkeston and surrounding settlements, and improved bus services. The provision of key transport and social infrastructure will provide a strong boost to the local economy and also assist with delivering key projects identified as being of importance in regenerating Ilkeston town centre.

2.18 A significant number of new homes are planned for the Stanton Regeneration Site, to the south of Ilkeston, as part of a mixed housing and employment development.

2.19 New homes of all types are required across Erewash to meet the Borough's assessed housing requirements. However, affordable social housing and small to medium sized entry-level market homes are especially needed, in line with the Council's most up to date Housing Needs evidence.

Gedling Borough

2.20 The Borough Council remains committed to the long term policy of urban concentration and regeneration. Development will be focussed in sustainable locations (urban edge and sustainable villages which are accessible to the City Centre) in order to support the role of the Nottingham City as a regional centre and contribute to ensuring that the development needs of the Greater Nottingham area are deliverable. As much housing as is

feasible has been located within and adjoining the Nottingham urban area. Sustainable Urban Extensions have also been identified at Hucknall in recognition of its Sub Regional Centre status, as well as Bestwood Village, Calverton and Ravenshead being identified as Key Settlements for sustainable growth.

2.21 The development strategy for Gedling will support the development of key regeneration sites. The locations are considered to be highly accessible to the City Centre and town centres and should assist in town centre regeneration. The redevelopment of Gedling Colliery/Chase Farm is a key strategic site on the urban edge of Nottingham and is identified as a broad location for future development. The current economic difficulties mean that comprehensive development is not considered deliverable at present. However, the site remains a priority for Gedling Council and the wording of the Aligned Core Strategies allows for the site to come forward if the funding situation changes (recognising that this is likely to be later on or beyond the end of the plan period).

2.22 The employment strategy will continue to protect and provide employment sites and premises to meet business needs with the protected employment sites in Gedling being well placed to receive any relocating firms moving as the result of the strategy for the Regeneration Zones in Nottingham City. Evidence also suggests that employment sites in Gedling have also traditionally played an important role in meeting the particular needs of smaller firms. In terms of employment, Nottingham City has helped to provide much of the job needs of Gedling residents and the strategy will continue to support this relationship.

Nottingham City

2.23 Due to its constrained boundaries, all development within Nottingham City is to be provided within or (to a very limited extent) adjoining the main built up area. The approach is strongly focused on economic development in the City Centre and the Regeneration Zones, and on key sites such as the Enterprise Zone which includes the Strategic Site at the Boots campus and existing employment sites at MediPark and Nottingham Science Park. Housing provision is sufficient to deliver the Council's regeneration ambitions, building on a past track record of good delivery on brownfield sites, but also reflecting other key Nottingham City priorities, particularly increasing the level of family housing provided in new development, to ensure the maintenance of balanced communities, and to allow choice to residents who would otherwise have to leave the City to meet their housing needs.

2.24 Early provision of housing will be through existing deliverable sites, whilst the strategic locations at the Waterside Regeneration Zone and Stanton Tip will take longer to deliver their full potential, so house building here is not expected early in the plan period. The delivery of housing on the Boots site will be assisted by the infrastructure planned to be put in place to support the development of the Enterprise Zone. Although the City Centre housing market has stalled due to recent economic circumstances, there is no reason

to suppose that further housing will not be provided here, as the market currently experiences relatively low vacancy rates, and it is supported by a large number of students. Purpose built student accommodation is also an important part of the mix, and further provision is planned.

Rushcliffe Borough

2.25 Rushcliffe Borough Council does not consider that the distribution of housing provision set out in the Regional Plan, and adopted by the Aligned Core Strategies, to be appropriate for its area. The Borough Council's view is that the housing growth required to meet the wider needs of Greater Nottingham should be less focused on Rushcliffe³. The Borough Council has therefore reviewed its housing target and, based on its interpretation of the evidence, has identified a figure that is lower than that proposed at the Aligned Core Strategy Option for Consultation stage (February 2010).

2.26 Rushcliffe's revised housing target has been established by the Borough Council based on what it believes can be delivered within the plan period on sites and at locations that it considers are able to sustainably accommodate new housing growth. This has led the Council to identify a target of 9,400 homes between 2011 and 2026 (the period covered by the Rushcliffe Core Strategy), some 4,000 fewer homes than previously proposed in the ACS Option for Consultation.

2.27 The view of the Borough Council is that to have provided for this 4,000 homes and, in so doing, to have satisfied Regional Plan policy of concentrating 70% of total Borough housing growth around the main built up area of Nottingham would have resulted in the development of land that, in its view, performs less well in sustainability terms than other sites elsewhere in Greater Nottingham.

2.28 In line with the localism agenda to planning, consultation was undertaken focussed on key settlements in the Borough to help determine a sustainable level of development in those communities. The Borough Council is also proposing a major Sustainable Urban Extension to the south of Clifton, accommodating 2,500 homes and 20 hectares of employment land, to, in part, assist in meeting wider Housing Market Area housing needs. (This text was provided by Rushcliffe Borough Council).

³ Broxtowe, Erewash, Gedling and Nottingham City have made representations to the Rushcliffe Core Strategy regarding the different approach taken to housing provision in the Borough. Whilst Broxtowe, Erewash, Gedling and Nottingham City do not agree with the approach taken by Rushcliffe Borough, this paper goes on to explain why the combined housing provision in the Core Strategies covering the HMA (including the Rushcliffe Core Strategy) is considered to meet the wider needs of the area as a whole.

3 Past Housing Delivery

Introduction

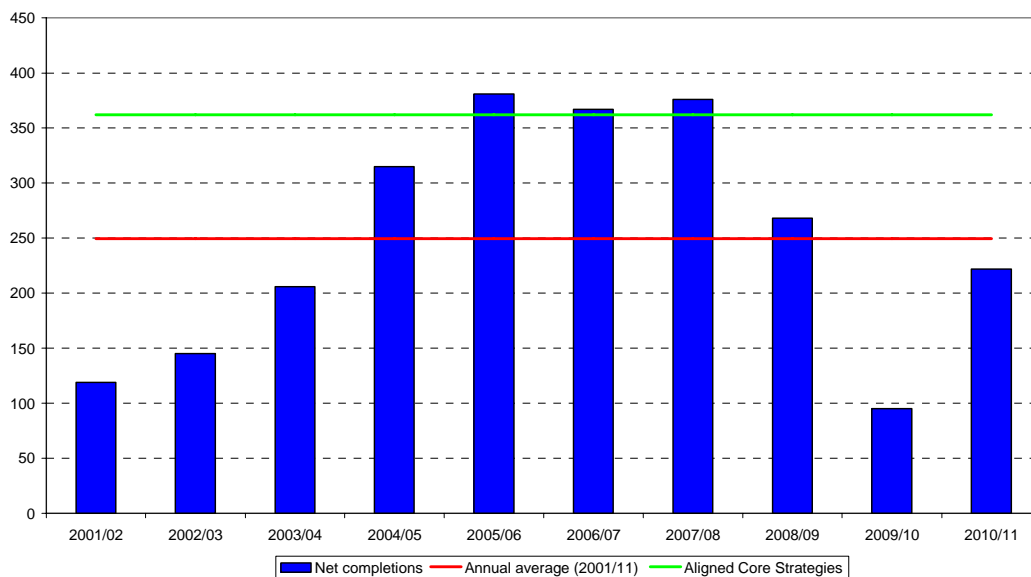
3.1 This section looks at the numbers of dwellings which have been delivered in the past in each district and compares these with the housing provision policies which applied at the time in the Regional Plan and Structure Plans, and also the figures in the Aligned Core Strategies. Although Hucknall was included in the Regional Plan's Three Cities Nottingham policy area, it has been excluded because Ashfield District Council are not part of the Aligned Core Strategies process.

Past performance by District

3.2 Table 1 gives details of completions between 2001 and 2011 year-by-year. This section shows the completion trends in each district with a brief commentary. All figures relate to the net increase in dwellings. Note that the charts use different vertical axes, so they are not directly comparable. Chart 6 in the next section brings them together.

Broxtowe

Figure 1: Net dwelling change in Broxtowe
2001 to 2011

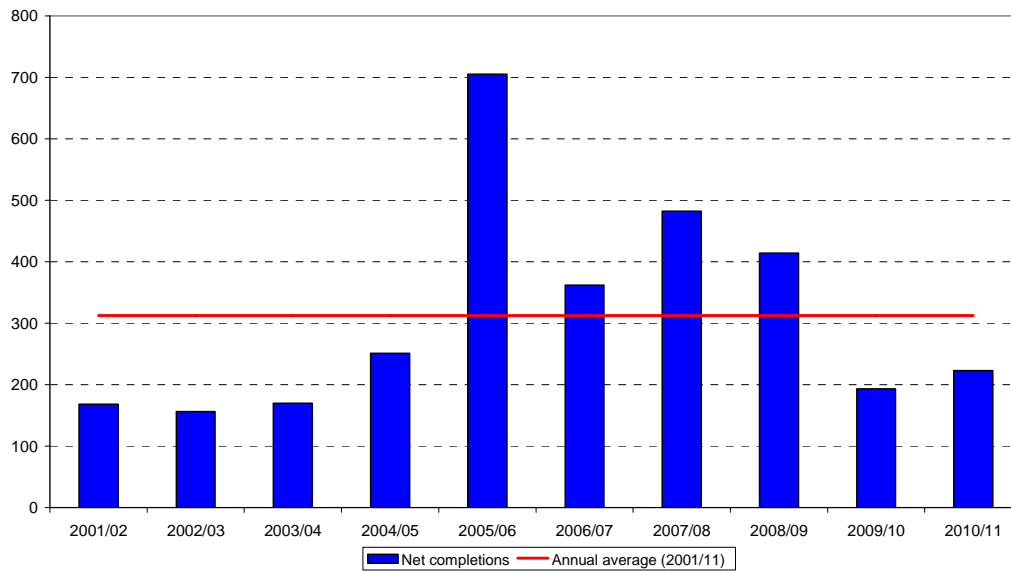


3.3 The net change in dwellings in Broxtowe between 2001/02 and 2010/11 was 2,494, an average of 249 per year. The annual figure rose steadily from 119 in 2001/02 to 381 in 2005/06, before falling to 95 in 2009/10. There was an increase to 222 in 2010/11 (of which 100 were affordable homes).

Erewash

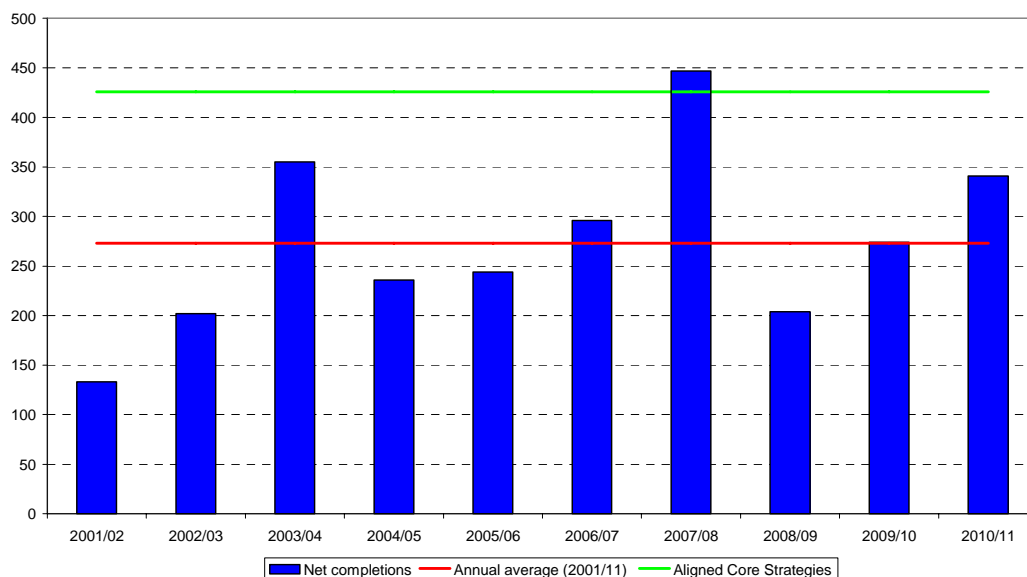
3.4 The net change in dwellings in Erewash between 2001/02 and 2010/11 was 3,124, an average of 312 per year. The annual figure rose from 168 in 2001/02 to a peak of 705 in 2005/06. There was a fall to 193 in 2009/10, followed by an increase to 223 in 2010/11.

Figure 2: Net dwelling change in Erewash
2001 to 2011



Gedling

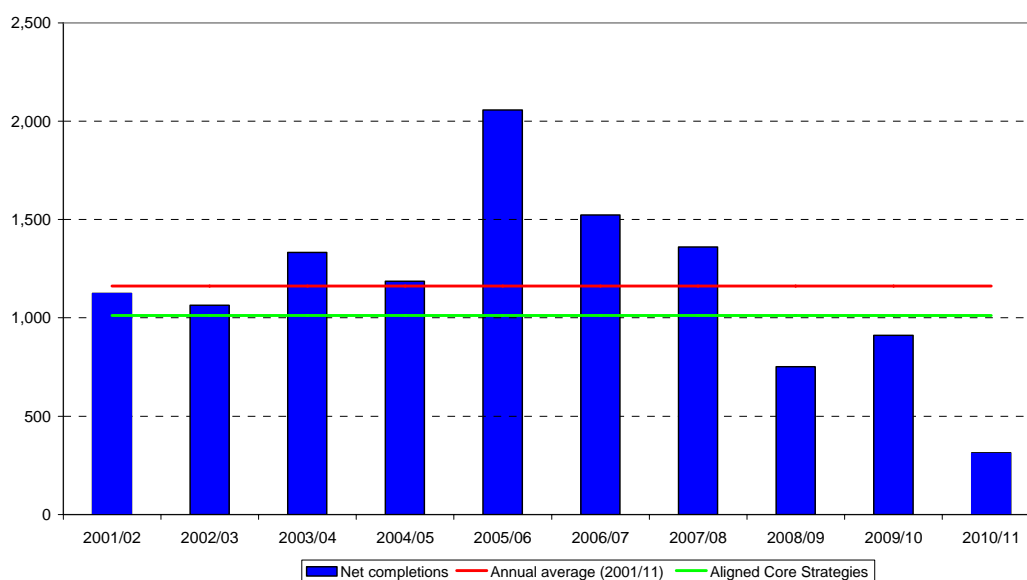
Figure 3: Net dwelling change in Gedling
2001 to 2011



3.5 The net change in dwellings in Gedling between 2001/02 and 2010/11 was 2,732, an average of 273 per year. The annual figure rose from 133 in 2001/02 to 355 in 2003/04 before dipping and rising again to 447 in 2007/08. After falling to 204 in 2008/09, the figure increased again to 341 in 2010/11.

Nottingham

Figure 4: Net dwelling change in Nottingham
2001 to 2011



3.6 The net change in dwellings in Nottingham between 2001/02 and 2010/11 was 11,625, an average of 1,162 per year. The annual figures from 2001/02 to 2004/05 were all between 1,065 and 1,332, the highest annual dwelling increases seen since the 1970s, but they were followed by a further increase to 2,057 in 2005/06. There was then a decline to 314 in 2010/11.

3.7 The historically high numbers were largely driven by the development of city centre flats and purpose-built student accommodation⁴. The very large fall in net completions is partly because the development of the former has temporarily ceased, but also because the number of demolitions has increased as redevelopment schemes have been started. In fact, the gross completions (excluding student accommodation) in 2010/11 (476 dwellings) were greater than in any year between 1995/96 and 2000/01.

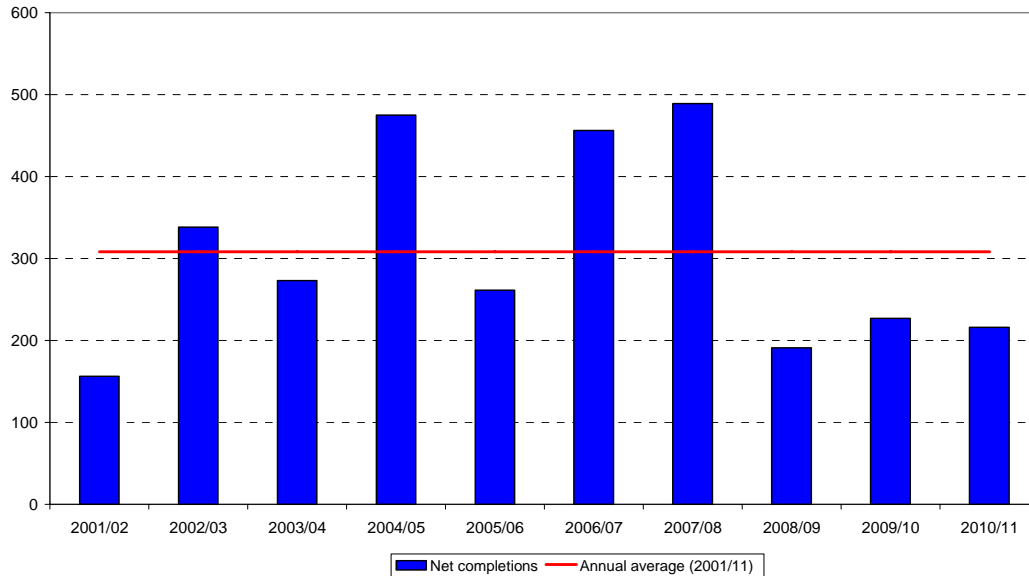
Rushcliffe

3.8 The net change in dwellings in Rushcliffe between 2001/02 and 2010/11 was 3,086, an average of 309 per year. The annual figure rose from 156 in 2001/02 to 475 in 2004/05. It dipped before rising again to 493 in

⁴ Following a change in Department for Communities and Local Government definitions in 2008, purpose-built student dwellings are now included in the figures, subject to certain criteria. The figures for years before then have been amended to include them, in order to give consistent information.

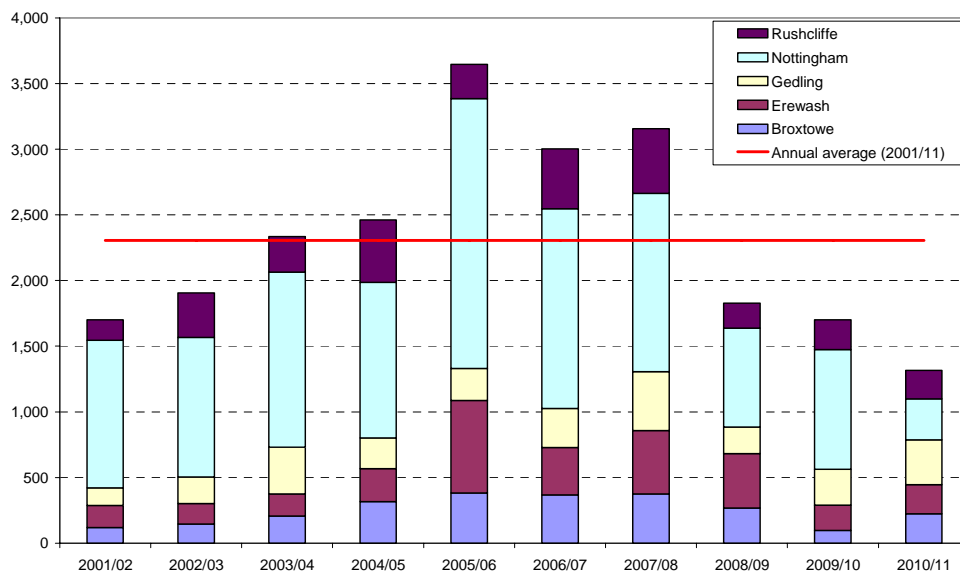
2007/08. The figures for the last three years were all around 200, with the 2010/11 figure being 226.

**Figure 5: Net dwelling change in Rushcliffe
2001 to 2011**



The overall Housing Market Area performance

**Figure 6: Net dwelling change in Nottingham Core HMA
2001 to 2011**

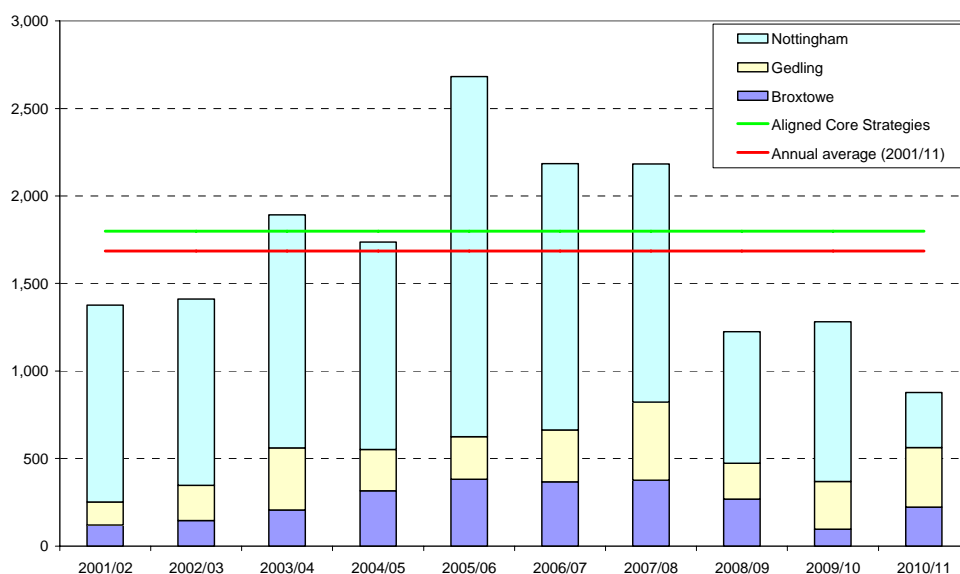


3.9 The net change in dwellings in the Housing Market Area between 2001/02 and 2010/11 was 23,061, an average of 2,306 per year. In common with most other areas, housing completions rose in the first part of the decade (from 1,700 in 2001/02 to 3,648 in 2005/06), before falling off from 2008 onwards following the housing market crash. The 2010/11 figure was 1,316.

The Aligned Core Strategies Councils

3.10 Looking just at the Aligned Core Strategies Councils (Broxtowe, Gedling and Nottingham City), the net change in dwellings between 2001/02 and 2010/11 was 16,851, an average of 1,685 per year. Housing completions rose in the first part of the decade (from 1,376 in 2001/02 to 2,682 in 2005/06) before falling to 877 in 2010/11. Across the period, the average annual level of completions was insufficient to deliver the annualised housing provision proposed in the Aligned Core Strategies (not taking account of the phasing in the plan).

Figure 7: Net dwelling change in the Aligned Core Strategies Districts
2001 to 2011



Comparison with the Structure Plans

3.11 Before the Regional Plan was adopted in March 2009, the district dwelling requirements were contained in structure plans. All of the Nottinghamshire districts in the HMA except Nottingham achieved their structure plan average annual requirement during the decade, with Broxtowe (39 per annum) being most in excess of the requirement. Rushcliffe and Gedling exceeded their requirements by 29 and 23 dwellings per annum respectively. Purpose-built student dwellings were excluded from the figures when the Structure Plans were drawn up and in force⁵ and, excluding them, Nottingham failed to meet its target by 14 dwellings per annum. It should be borne in mind, though, that the Nottinghamshire and Nottingham Joint Structure Plan ran from 2001 to 2021, so the comparisons are only over the first half of the plan-period.

⁵ See footnote on page 13.

3.12 On the other hand, the Derby and Derbyshire Joint Structure ran from 1991 to 2011. Looking over the whole twenty-year period, Erewash exceeded its requirement by 55 dwellings per annum.

Comparison with the Regional Plan

3.13 Comparing average annual completions for the whole decade with the Regional Plan's annual requirement for 2006 to 2026, Nottingham City was the only district to exceed its requirement. Not surprisingly, in view of the recent performance of the housing market, all of the Councils are considerably behind if only 2006 to 2011 is included, i.e. the first quarter of the Regional Plan's period. Taken together, the annual average for the HMA was 2,202, compared with the Regional Plan's 2,850 per annum.

Comparison with the Core Strategies

3.14 Of the three Aligned Core Strategies (ACS) districts, only Nottingham City has a per annum requirement (2011 to 2028) lower than the annual average net dwelling change for 2001 to 2011. In Gedling, the ACS provision is 153 higher than the 2001/11 average and in Broxtowe it is 113 higher. In Nottingham City, the 2001/11 average is 154 higher than the ACS figure, but the 2006/11 average is 37 lower.

3.15 In Nottingham City, the ACS annual average was exceeded in seven of the ten years between 2001/02 and 2010/11. Broxtowe exceeded their ACS figures in three of the years and Gedling in only one.

3.16 In Erewash, the Core Strategy annual average is 368⁶. This is 56 higher than the 2001/11 average and it was only exceeded in 3 years in that period.

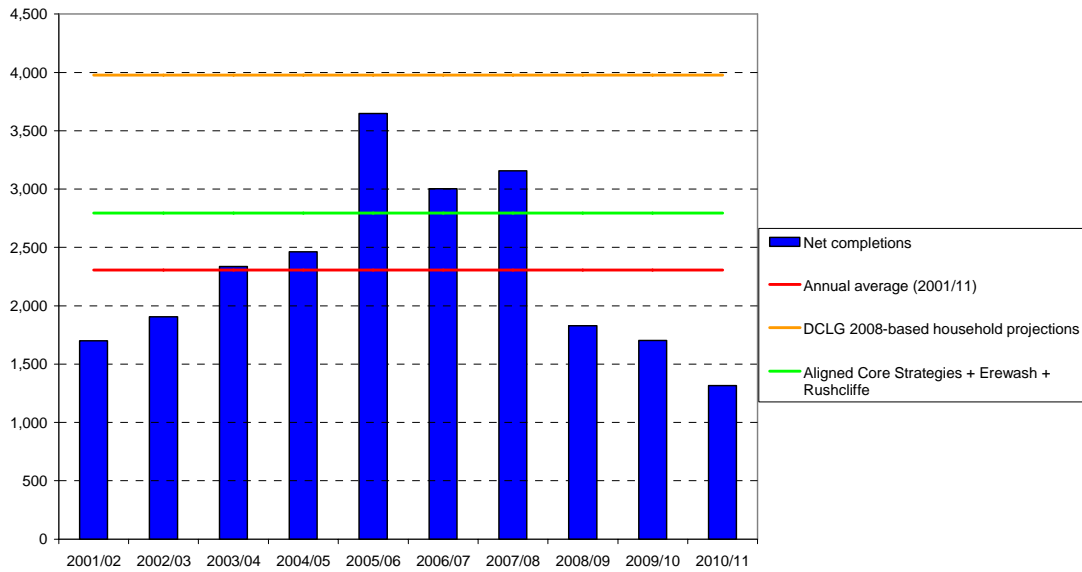
3.17 The annual average in the Rushcliffe Core Strategy (2011 to 2026) is 627. This is 318 higher than the 2001/11 average and it was not exceeded in any years since 2001.

Comparison with the CLG 2008-based household projections

3.16 Figure 8 compares the overall Nottingham Core HMA performance and Aligned Core Strategies figure with the average annual dwelling increase resulting from the Department for Communities and Local Government (CLG) 2008-based household projections. For these purposes, 368 dwellings per year (2011 to 2028) have been included for Erewash and 627 dwellings per year (2011 to 2026) have been included for Rushcliffe, as in their Publication Core Strategy (published 23rd March 2012).

⁶ Subject to approval of the Core Strategy by the Borough Council meeting on 21st June 2012.

Figure 8: Net dwelling change in Nottingham Core HMA (2001 to 2011) compared with the DCLG household projections



3.17 This shows that the annual requirement from the CLG projections would be nearly 1,700 (73%) higher than the annual average achieved between 2001 and 2011. Even in the peak year (2005/06), the figure achieved was over 300 less than the CLG projections. The annual average required to meet the Aligned, Erewash and Rushcliffe Core Strategies was only achieved in three years between 2001/02 and 2010/11.

Table 3.1: Net dwelling change (2001 to 2011)

	2001/02	2002/03	2003/04	2004/05	2005/06	2006/07	2007/08	2008/09	2009/10	2010/11	Total 2001/11	Ave p.a.
Broxtowe	119	145	206	315	381	367	376	268	95	222	2,494	249
Erewash	168	156	170	251	705	362	482	414	193	223	3,124	312
Gedling	133	202	355	236	244	296	447	204	274	341	2,732	273
Nottingham	1,124	1,065	1,332	1,186	2,057	1,523	1,360	752	912	314	11,625	1,163
Rushcliffe	156	338	273	475	261	456	493	191	227	216	3,086	309
Nottingham Core HMA	1,700	1,906	2,336	2,463	3,648	3,004	3,158	1,829	1,701	1,316	23,061	2,306

Table 2: Comparison with plan targets

	Total 2001/11	2001/11 Average per annum	Total 2006/11	2006/11 Average per annum	Structure Plan		Regional Plan per annum 2006/26	Aligned Core Strategies per annum 2011/28
					plan period	per annum		
Broxtowe	2,494	249	1,328	266	2001/21	210	340	362
Erewash	3,124	312	1,674	335	1991/2011*	300	360	n/a
Gedling	2,732	273	1,562	312	2001/21	250	400	426
Nottingham	11,625	1,163	4,861	972	2001/21**	925	1,000	1,009
Rushcliffe	3,086	309	1,583	317	2001/21	280	750	n/a
Nottingham Core HMA	23,061	2,306	11,008	2,202	n/a	1,965	2,850	n/a

* The Derby and Derbyshire Structure Plan period was 1991 to 2011. The Erewash average annual net dwelling change was 355 for this period.

** Purpose-built student dwellings are included in the dwelling change figures for Nottingham and the Regional Plan, but the Structure Plan excluded them. The 2001/11 annual average is 905 excluding purpose-built student dwellings.

n/a No Aligned Core Strategies figures are available for Erewash, Rushcliffe and Nottingham Core HMA.

Source: Planning Authority monitoring systems. Years are financial years, i.e. 1st April to 31st March.

4 Policy background

Background to the Regional Plan housing figures

4.1 The housing provision figures in the Aligned Core Strategies 'Option for Consultation' draft were derived from the East Midlands Regional Plan, which was adopted in March 2009 (the Regional Spatial Strategy). The Regional Plan covered the period 2006 to 2026, whereas the Aligned Core Strategies for Broxtowe, Gedling and Nottingham City, and the Erewash Core Strategy cover the period 2011 to 2028 (to allow for a 15 year plan period from adoption). In deriving an appropriate figure for the ACS, account has been taken of the net level of completions in Greater Nottingham between 2006 and 2011. (NB, as well as using a different housing provision methodology, Rushcliffe have decided to continue to plan to 2026).

4.2 The Draft East Midlands Regional Plan (September 2006) used the Government's 2003-based projections⁷ as the basis for its housing numbers. This set out an annual average of 2,370 new dwellings (net) between 2001 and 2026 for the Nottingham Core Housing Market Area⁸ (HMA). This level of housing provision was above the figure suggested by the projections, reflecting the fact that the trend in the early 2000s was towards in-migration rather than the out-migration experienced over the longer term. It also took account of Nottingham's designation by the previous Government as part of the 3 Cities Growth Point.

4.3 The distribution within the HMA was informed by an iterative process, which looked at constraints and opportunities at both a strategic and detailed level. It was concluded that, although the above trend level of growth was appropriate at the HMA level (subject to provisos, in particular the availability of resources), it would be both undesirable and unachievable in Nottingham City. The distribution was also informed by a review of the Nottingham-Derby Green Belt, as required by the previous Regional Planning Guidance (January 2002).

4.4 Shortly before the Examination in Public into the Regional Plan started, the official 2004-based projections were published. These were taken into account by the Panel conducting the Examination, which proposed an annual average of 3,010 dwellings between 2006 and 2026 (East Midlands Regional Plan, Report of the Panel, November 2007). By comparing the Draft Regional Plan figures with the previous, 2003-based projections, the Panel had ascertained what they termed the "net policy impact" – i.e. how much above the trend in the projections the Draft Plan's figures were. They had then added this net policy impact to the 2004-based projections. In this way, they maintained the relationship between the official household projections and the proposed policies, with the Regional Plan providing for above-trend levels of housing growth.

⁷ Population projections produced by the Office for National Statistics (ONS) and household projections published by the Department for Communities and Local Government (CLG). Note that all of the projections referred to are based on past trends and have no policy element.

⁸ Note that this excludes Hucknall, which was in the Regional Plan's Three Cities Nottingham policy area but is not in the Nottingham Core Housing Market Area. Housing Market Areas in the Regional Plan were all defined in terms of whole districts.

4.5 The Panel Report recommended different annual figures for the periods 2006-11, 2011-16 and 2016-26, to reflect the anticipated different build rates throughout the plan period, lower in the early years of the plan, and higher in late years. Taken together, this gives an annual average of 3,010 dwellings between 2006 and 2026. The Secretary of State's Proposed Changes to the Regional Plan accepted the Panel's recommendation with regard to the overall number, but did not include the phasing across the plan period. It was also proposed that the figures for all of the districts were increased by a similar percentage (19%) in order to meet the overall figure.

4.6 Following further representations, primarily that the figure for Nottingham City was unrealistically high, the Secretary of State reduced the annual average in the adopted Regional Plan to 2,850 (2006 to 2026), or a net dwelling change of 57,000 in total over the period.

4.7 Before the Proposed Changes were published, revised 2004-based projections were released, which showed higher numbers of future households, but the Secretary of State considered that it was not appropriate to take account of these, saying that they, and subsequent 2006-based projections, should be included in a Partial Review of the Regional Plan.

4.8 The Regional Plan said that these were the housing figures which authorities should plan for, but that they could test higher figures in their development plan documents provided that these were consistent with the principles of sustainable development.

4.9 The Partial Review, which was started in 2009 but scrapped after the change in Government, was considering the implications of the 2006-based projections, which projected an 88,000 increase in households in the Nottingham Core HMA between 2006 and 2026, compared with 49,000 in the original 2004-based projections which formed the basis of the Regional Plan figures.

4.10 The Regional Plan was based on a strategy of urban concentration and regeneration, essentially prioritising the 'Principal Urban Area' (PUA or main built-up area) of Nottingham for most growth. The Plan was very prescriptive, giving minimum housing figures for both the Principal Urban Area⁹ and for elsewhere. Whilst supportive of the overall objective of urban concentration, most local authorities affected by this 'PUA/non-PUA' split objected to the precise numerical split, as it would result in a lack of flexibility to respond to local circumstances. This could, for instance, undermine regeneration efforts outside of the PUA or prevent development in sustainable locations in non-PUA settlements.

4.11 A particular issue was that the figures for the PUA parts of each district in the Draft Regional Plan had been drawn up by assessing their capacity for new housing. When the Proposed Changes were published, the PUA and non-PUA parts were both increased by 19%, taking no account of their relative capacities for development. This had the effect of making the Regional Plan less deliverable.

⁹ "Within or adjoining the PUA".

4.12 Although the broad strategy is supported and taken forward in the Core Strategies, the numerical split in the Regional Plan does not provide sufficient flexibility to allow for appropriate levels of development at Key Settlements, to ensure their regeneration and ongoing sustainability. It also did not anticipate the difficulties associated with delivering some key sites within the urban area, such as at Gedling Colliery/Chase Farm. Subsequent work (Sustainable Locations for Growth Study, Tribal 2010) provides evidence of sustainable development opportunities in Key Settlements, and some are therefore proposed for more growth than the Regional Plan would allow for.

The Official 2008-based household projections

4.13 The latest CLG household projections are now the 2008-based projections, which were published in November 2010. These give a significantly lower household increase between 2006 and 2026 in the Nottingham Core HMA than in the 2006-based projections which were being considered by the Partial Review of the Regional Plan – 77,000 compared with 88,000, showing how much the projections can be affected by changes to short-term migration trends. (The 2008-based projections are based on trends between 2003 and 2008, since 2008 the housing market and economic dynamics and trends have changed dramatically). For the Aligned Core Strategies period (2011 to 2028), the projected household increase for the HMA in the CLG projections is 65,700. As with all of the official projections, these are based upon a continuation of the migration trends seen in the recent past - in this case between 2003 and 2008.

Post- Regional Plan and the Localism Act

4.14 The Government's key housing objective set out in the National Planning Policy Framework (NPPF) is to increase significantly the delivery of new homes. Everyone should have the opportunity to live in high quality, well designed homes, which they can afford, in a community where they want to live.

4.15 It states (among other things) that local planning authorities should:

- use an evidence-base to ensure that their Local Plan meets the full requirements for market and affordable housing in the housing market area, 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 (moved forward from later in the plan period) to ensure choice and competition in the market for land; and
- identify a supply of specific, developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15

4.16 The NPPF recognises the importance of the Government's Household Projections as part of the evidence base for housing provision. The latest Household

Projections (2008-based) were published in November 2010, and are described in section 3 of this document and above.

4.17 In March 2012, ONS published 2010-based population projections, but no official (CLG) household projections are to be produced from these. The next official household projections will not be published until after the 2011 Census data is available, probably in 2014.

Local consideration post-Regional Plan

4.18 Because of the impending abolition of the Regional Plan and the increased emphasis on localism, Broxtowe, Erewash, Gedling and Nottingham City decided to carry out a further round of consultation on their approach to housing provision, which was contained in the Housing Provision Position Paper (HPPP), published in July 2011. This compared the Regional Plan figures, which the Aligned Core Strategies Option for Consultation draft (February 2010) proposed to carry forward, with the CLG 2008-based household projections and specially commissioned projections using a number of scenarios. Rushcliffe figures were included in this exercise although, by this time, the Borough Council had decided to take a different approach to determining its housing figures. The Hucknall part of Ashfield was also included in the analysis.

4.19 The scenarios were not intended to be housing provision options, rather they were to inform decision-makers and interested bodies of the implications of different levels of housing provision for the level of jobs, for meeting the needs of the existing population, and for migration. The scenarios which were included were:-

- Natural change in the existing population (i.e. births and deaths with no allowance for migration)
- Balanced migration (which allows for the different age-structures of in and out-migrants but has total in and out-migration in balance)
- No increase in jobs
- Past housebuilding rates (April 2000 to March 2010)

4.20 The conclusions of the HPPP were that:-

- Given the economic aspirations of the Government, the Councils, and the Local Enterprise Partnership for Derby, Derbyshire, Nottingham and Nottinghamshire, the No Increase in Jobs scenario would provide for too few homes (44,444 between 2009 and 2026)
- The Past House Building Rates scenario also provided insufficient homes (41,888).
- The scale of new homes implied by the CLG 2008-based Household Projections (71,706) was unrealistic in terms of its delivery, as it simply was not considered possible to build this number of new homes over the Aligned Core Strategy period. It would also lead to significant further greenfield development, and require the evidence base of the draft Aligned Core Strategies to be revisited and, therefore, in turn require further consultation (effectively starting the process from scratch), which would lead to further delay in getting a planning framework into place

- The Natural Change scenario (57,717) was not realistic, as there is always bound to be some migration, and, therefore, it could not form the basis of planning for future housing requirements.
- The Balanced Migration scenario (51,021) was very close to the housing provision already included in the draft Aligned Core Strategies (52,050) and would provide sufficient new homes to allow for economic aspirations in terms of jobs growth.
- The Balanced Migration scenario was, therefore, considered to support the existing level of housing provision set out in the draft Aligned Core Strategies as an appropriate target to plan for in Greater Nottingham.

4.21 Having come to this conclusion, the HPPP rebased the housing provision figures to cover the period 2011 to 2028, to allow the end-date to be 15 years from the expected date of adoption, as preferred by Government guidance, and to take account of completions between 2009 and 2011.

4.22 Work on the projections for the HPPP highlighted the fact that in three districts (Broxtowe, Nottingham City and Rushcliffe) the number of households had not risen as much between 2001 and 2010 as indicated in the projections, even though the population had – i.e. the proportion of people “heading” households was less than assumed. Because of this, new projections were commissioned to reflect the actual number of households in 2010 and the demographic implications of the proposed levels of housing provision. See paragraphs 5.5 to 5.10 below and the Household Projection Background Paper (2012) for more about these.

5 Housing Provision for Greater Nottingham

5.1 As explained earlier (section 4), housing provision for Broxtowe, Erewash, Gedling and Nottingham City is derived from the Regional Plan as shown in table 5.1. (There are slight differences between this table, and that included in the Housing Provision Position Paper. The latter used the Aligned Core Strategies ‘Option for Consultation’ as a starting point, whilst the publication version of the Core Strategies use the original Regional Plan figures, as this is considered to be a more appropriate approach).

Table 5.1 Housing Provision Figures

	Regional Plan provision 2006-2026	Regional Plan provision 2006-2028	Completions 2006-2011	ACS Provision 2011-2028	Rounded ACS Provision 2011-2028
Broxtowe	6,800	7,480	1,328	6,152	6,150
Erewash	7,200	7,920	1,674	6,246	6,250
Gedling	8,000	8,800	1,562	7,238	7,250
Nottingham City	20,000	22,000	4,861	17,139	17,150
Total	42,000	46,200	9,425	36,775	36,800

Totals may not sum due to rounding.

Completions are net figures, with demolitions subtracted (this particularly affects the City Council's figures).

5.2 This gives a total housing provision for the Councils areas of 36,800 to 2028. A housing provision for the Housing market Area (Greater Nottingham except Hucknall) can be derived to 2026 by adding the Rushcliffe Core Strategy provision.

5.3 The NPPF states that in order to be ‘sound’ plans need to meet four tests of soundness:-

- **Positively prepared** – the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development;
- **Justified** – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence;
- **Effective** – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities; and
- **Consistent with national policy** – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework.

Positively Prepared

5.4 In order to arrive at an objective assessment of housing development requirements, including unmet requirements from neighbouring authorities, it is necessary to consider the Core Strategies covering the Housing Market Area together. The housing provision figures of these Core Strategies total 41,610 to 2026 (see the Housing Trajectories in Appendix A).

5.5 As described in paragraph 4.17 above, new projections were commissioned to update the 2008-based Household Projections taking account of the actual number of households in 2010 and the demographic implications of the proposed levels of housing provision.

5.6 Edge Analytics were commissioned to provide information for the 'Popgroup' model which has been used to understand the implications of the ACS housing provision figures for population, the labour market, and migration. It should be noted that due to making different headship¹⁰ rate assumptions, these locally derived household projections are not comparable to the information contained in the Housing Provision Position Paper, 2011. Using the updated (rescaled) headship rates, the model ran three options for projecting forward trends:

1. To use the rescaled (actual) 2010 headship rates for 5 years and then to resume the CLG trend
2. To use the rescaled (actual) 2010 headship rates for all years up to 2028
3. To continue the 2001 to 2008 trend shown in the rescaled headship rates up to 2028 (i.e. that, if they went down between 2001 and 2008, they would reduce further up to 2028) .

5.7 Given the current uncertainties in the economy and housing market, it is believed that option 2 is the most reasonable one to take, as it seems unlikely that longer term trends will resume after 2015 (option 1), but a continuation of short term trends (option 3) may be seen as being too pessimistic in household formation terms.

5.8 In brief, using option 2, the newly commissioned projections show that the combined level of housing provision of the Broxtowe, Erewash, Gedling and Nottingham City Core Strategies, and the Rushcliffe Core Strategy is higher than that needed to meet the needs of the existing population of the area, and therefore is sufficient to allow for continued net in-migration into the area, albeit at a lower level than past rates. This equates to around 1,200 in migrants per year as compared to around 2,700 on average between 2003 and 2010, whilst also allowing for an increase in economically active people (aged 16+) of about 16,300. These projections, can be regarded as forecasts of what would happen if the housing development proposed in the Core Strategies occurs.

5.9 Although there is no reliable way to project the future levels of in migration, this lower rate of in migration is considered to be appropriate for the area. This is because the recent levels of net in-migration (used in government's Household Projections)

¹⁰ That is the proportion of people in each age-sex group "heading" a household. A "household" is defined as one person living alone or a group of people living together. Other factors need to be taken into account when converting households into dwellings, primarily an allowance for vacant properties.

occurred at a time of high international migration and increasing student numbers. Both these factors are not expected to continue at their past rates because:

- Changes in the economic situation and Government policy are likely to mean that international immigration will reduce.
- The number of full-time students studying at the two universities increased by 8,300 between 2005 and 2010, an average of nearly 1,700 per annum, the majority of which will have resulted in net in-migration to the area. It is understood that the Universities are not planning significant expansion over the next few years, so this level of increase is very unlikely to be seen in the future. Changes in student finance may also have an effect.

5.10 The labour force projected from these newly commissioned projections and the number of new jobs expected to be generated over the plan period have been compared, and are consistent (see Employment Background Paper, 2012). The levels of housing provision included in the Core Strategies is therefore appropriate in terms of their economic aspirations.

5.11 This work provides an objective assessment of housing development requirements across the Housing Market Area, and concludes the proposed level of provision of the combined Core Strategies is appropriate. For further information, see the Household Projections Background Paper, June 2012.

Justified and Effective

5.12 Previous consultations on the Aligned Core Strategies have highlighted a concern amongst the development industry that the housing provision levels proposed are not high enough. A frequent argument is that for the plans to be justified, their housing provision should be derived directly from the 2008-based Household Projections. Equally, many residents and environmental bodies have argued for lower figures. The arguments above explain why the Councils consider the housing provision to be appropriate in terms of the objectively assessed evidence, this section explains why it is also considered to be the most appropriate in terms of these commonly cited 'reasonable alternatives', and its effectiveness in terms of deliverability.

5.13 In terms of lower housing figures, using option 2, the newly commissioned projections show that the lower figures suggested by consultees are inadequate to meet the needs of the resident population, assuming in and out migration is in balance. This implies either larger households than those assumed in the recent Household Projections work, or out-migration from the area. Significantly lower figures would also have implications for the economy, in terms of lower job and economic growth, which it is considered would not be in line with the NPPF in so far as plans being ambitious but deliverable, and in terms of boosting significantly the supply of housing.

5.14 In terms of higher housing provision, the Councils contend that not only is their proposed level of housing provision appropriate, any higher figures proposed would be undeliverable, rendering the Core Strategies undeliverable, and therefore not in

accordance with the NPPF. Evidence for this is set out below, in terms of housing delivery, economic conditions and other factors.

Housing delivery

5.15 If housing provision in Greater Nottingham (including Erewash, Rushcliffe and the Hucknall part of Ashfield) were to be based solely on the 2008-based household projections, then that implies a housing provision of 71,700 (2009 to 2026), an increase over the 52,050 figure in the draft Aligned Core Strategies Option for Consultation (derived from the RSS) of 19,650, or 27.4%.

5.16 The figure of 71,700 new homes is based on projecting forward past trends, on the assumption that the trends will continue over the entire plan period, and that the market would be able to build and sell the number of homes predicted. It is worth noting that the projections look back over 2003 to 2008, which is the strongest period of housing growth recorded in Greater Nottingham, taken as a whole, since the 1970s (see section 3 above, and table 3.1).

5.17 In terms of deliverability, the combined housing provision figures of the HMA's Core Strategies are considered to be extremely challenging, especially in comparison with past rates of delivery, and the councils' trajectories show that a significant up-lift in current completions will be required if the plans are to achieve their totals.

5.18 Rushcliffe's Core Strategy provides for 9,400 homes between 2011 and 2026. In order to allow wider analysis across the HMA, the Aligned Core Strategies 'Option for Consultation' (which covers the same period) housing provision figure of 32,210 for Broxtowe, Erewash, Gedling and Nottingham City can be added to the Rushcliffe figure give a total of 41,610¹¹. Achieving this level of housing provision would require an annual net completion rate of 2,448 homes. This compares with an annual average (2001-2011) of 2,306. Net completions in 2010/11 were only 1,316, and the required level of net completions has only been achieved in 4 of the past 10 years, see table 3.1.

5.19 To increase net completion levels from their current low levels to a level sufficient to meet the total Aligned Core Strategies proposed housing provision will be very challenging, even with an early return to good housing market conditions. To achieve figures more closely related to the 2008-based household projections is not considered feasible. A plan including higher figures would not therefore meet the test of soundness of being effective, as the plan would not be deliverable over its period.

5.20 By way of illustration, the National Housing and Planning Policy Advice Unit publication 'Housing Requirements and the Impact of Recent Economic and Demographic Change' (2009) refers to the house building industry not being capable of increasing output long term by more than 5% a year. Applying that rate to the 2010/11 level of completions means that the combined Core Strategies' level of housing provision to 2026 of 41,610 will not be achieved until after 2030/31. By the end of 2026, there would be a shortfall of 11,793 homes. Indeed, it would take a much

¹¹ See the "Strategic Allocation (cumulative)" row in the housing trajectories in Appendix A. At the time of writing, a housing provision for Hucknall has not been determined, so this area cannot be included.

higher year on year increase in output of just under 9% a year to meet the ACS plus RBC 2009 to 2026 housing provision figure, with an implied completion rate of 4,730 in 2025/26, some 1,080 more homes than completed in the peak year of 2005/06.

5.21 Even to achieve these totals relies on net completion figures starting to recover in 2011/12, which is considered to be a highly unlikely prospect (see below). Clearly housing provision figures in excess of those proposed by the Councils, especially those implied by the 2008-based household projections, would require far higher levels of annual increased output from the house building industry. The housing provision implied by CLG's 2008-based Household Projections for the HMA for the same period is 65,700, requiring a year on year increase of completions of over 16% and a final year completion level of almost 10,200 new homes.

5.22 The Councils' approach is supported by the fact that in the short term at least, viability on many sites remains fragile, and several sites previously promoted by the Councils (e.g. Gedling Colliery/Chase Farm) have had to be reconsidered and alternatives proposed. Indeed, some longstanding allocations, which are considered to be suitable and deliverable, have not been taken up by the market (for example Top Wighay Farm, allocated in the Gedling Local Plan, an unconstrained greenfield site), whilst some sites with planning permission, such as at Sharphill (Edwalton, Rushcliffe), a similarly unconstrained greenfield site in an area with a strong housing market which received planning permission in 2009, has yet to deliver any new homes. In Broxtowe there are large allocated sites in Eastwood and other weaker housing sub markets which are now starting to come forward for development but slowly.

5.23 When compiling Annual Monitoring Reports it is commonplace for promoters and landowners of sites to point out that the slowdown in housing delivery is due to the housing market rather than any fundamental viability or delivery issue on the allocated sites. This appears to be borne out by evidence of more recent activity in obtaining up to date planning consents for development including with a 25% requirement for affordable housing.

5.24 The housing trajectories for the Core Strategies (see Appendix A), which show estimates of how the housing provision will be met over the plan period, are biased towards the latter part of the period, to account for the current poor state of the housing market.

5.25 Additionally, it is often argued that the allocation of a range of new sites, for instance through a recently adopted Local Plan, will increase the supply, and thus lead to increased completion rates. The Broxtowe Local Plan was adopted in 2004 (albeit that shortly after this the upturn in housing completions was due to windfall sites more than new allocations), the Erewash Borough Local Plan in 2005, the Gedling Local Plan in 2005, and the Nottingham Local Plan in 2005, whilst the Rushcliffe Non Statutory Local Plan was approved in 2006. There may be some support for this in Figures 1.1 to 1.5, although the period of 2005 to 2007 reflected the highest house building rates nationally, and it is equally likely that trends in the Housing Market Area were simply following national trends. (CLG Housing Statistical Release 16 February 2012, states that nationally "Annual housing completions increased from 129,510 in the 12 months ending December 2001, reaching a peak of 175,560 in the 12 months

ending December 2007. Completions totalled 109,020 in the 12 months to December 2011, 38 per cent below the peak.”)

5.26 Notwithstanding that, the release of a significant amount of new suitable housing land will not be sufficient of itself to lead to increases in housing completions at levels to deliver in excess of the combined Core Strategies housing provision levels, simply due to the current state of the housing market. Indeed, the delivery of the Councils’ proposed housing provision figures rely heavily on an early return to good market conditions.

5.27 However, there is little evidence for an early return to good market conditions. Various recent reports on the state of the economy and housing market have been produced, for instance:-

The Outlook for Housebuilding

5.28 A number of recently published research papers highlight the current difficult economic conditions, and how they are impacting on the housing market.

5.29 Savills Research Residential Property Focus for Quarter 4 2011 looks at the housing market nationally and regionally over the next 5 years. It focuses on the housing market generally but includes new house building, and concludes:

- the recovery seen in London and the South East has not been reflected in other property markets.
- Very low growth is expected in average house prices over the next 5 years.
- Transactions will remain at an all time low.
- House prices will stabilise in the East Midlands by 2013, with growth thereafter, reaching the price levels of the peak after 2016.
- For new house building it concludes the principal constraint on the viability of land is reduced market capacity bought about by limited availability of mortgage finance.
- However it notes a marked increase in the demand for rental properties, with rental values growing faster than capital values. Large scale portfolio investment could potentially significantly expand this sector, but has yet to bear fruit.

5.30 Jones Lang LaSalle Property Predictions 2012 includes similar findings. It concludes:-

- Planning reform will help in the longer term, but the lack of mortgages is the real issue for the moment – although the government’s housing strategy will help.
- Lack of finance will remain the major constraint. Unless some alternative form of demand is found – such as the institutional rented sector – it is hard to envisage developers returning to the levels seen before the financial crisis, even in the medium term.
- The rental market will continue to expand. There may be some activity from institutional investors but the barriers, despite recent Real Estate Investment trust reforms, should not be underestimated.

5.31 Frank Knight UK Housing Market Forecast (Q4 2011) also concludes:

- Property values nearly 15% below 2007 peak.
- A 'slow correction' is most likely scenario, low interest rates for medium term but transactions muted. Prices fall in nominal and real terms in 2012, low nominal growth, but real falls in 2013 and 2014, slow recovery in prices and volumes post 2015.
- Gradual rise in transactions from next year, but no return to pre-2007 levels until post 2015
- For the East Midlands, recovery to 2007 peak is estimated at 2017.

Other factors

5.32 There are additional reasons why it would be inappropriate to increase the housing provision above that proposed.

5.33 Any higher provision will have to take place on greenfield (and very likely Green Belt) sites, as brownfield options have already been taken account in the current provision. A likely effect of higher provision combined with fragile delivery is that the easier to develop greenfield sites would be developed at the expense of brownfield sites, potentially achieving Aligned Core Strategy envisaged levels of development, but leaving the more difficult brownfield and regeneration sites undeveloped, with obvious negative effects on regeneration objectives and other sustainability objectives, such as access and biodiversity, and not meeting the government's aim of encouraging the effective use of land. It would also represent the unnecessary development of greenfield/Green Belt land, contrary to the aims of the NPPF.

5.34 Higher housing provision would inevitably lead to the need for more infrastructure not currently anticipated through the Infrastructure Delivery Plan, and would particularly impact on transport capacity, congestion, pollution and education provision at a time when public resources for the delivery of new infrastructure are very scarce.

Consistent with national policy

5.35 Paragraph 1.9 sets out why it is considered the HMA's Core Strategies are consistent with national policy in so far as it relates to housing provision. The Core Strategies have used an objective evidence base to ensure the housing provision meets the full requirements of the area. For each council, the Core Strategy will set the housing requirements against which their 5 year supply of deliverable sites for housing will be considered. The housing provision in the plan is phased, to reflect the anticipated different build rates throughout the plan period. It is this phased provision that the Councils will use to determine their five year housing supply, rather than a simple average figure derived from the total housing provision over the plan period as a whole.

6 AFFORDABLE HOUSING

Affordable Housing Need

6.1 Affordable housing is defined as social rented, affordable rented and intermediate housing, provided to eligible households whose needs are not met by the market. Government guidance indicates that affordable housing should include provisions to remain at an affordable price for future eligible households or for the subsidy to be recycled for alternative affordable housing provision.

6.2 The East Midlands Regional Plan (2007) contained indicative targets for monitoring purposes for the amount of affordable housing to be provided within each Housing Market Area (HMA) between 2016 and 2026. For the Nottingham Core HMA¹² the target was 17,100 representing 30% of the plan's total housing provision for the HMA.

6.3 The Nottingham Core Strategic Housing Market Assessment; Affordable Housing Needs update 2009 identifies the level of need for each authority based upon current and future projections and the development targets outlined in the East Midlands Regional Plan. The need levels are estimated to be as follows:-

Table 6.1

Authority	Potential level of net affordable housing need per annum	2011-2028
Broxtowe	445	7,565
Erewash	357	6,069
Gedling	396	6,732
Nottingham	289	4,913
Rushcliffe	362	6,154
Total	1,849	31,433

Source: Nottingham Core Strategic Housing Market Assessment Needs Update 2009

NB: The table above contains potential levels of affordable housing need and does not take into account viability considerations and other policy factors.

6.4 The total housing provision for the Broxtowe, Gedling and Nottingham City Core Strategies is 30,550, whilst the level of affordable housing need for the 3 Councils is representing 62.8% of the total plan area housing provision.

6.5 Evidence clearly indicates that achieving this level of provision through the planning system is unviable, and Broxtowe, Erewash and Rushcliffe have a maximum provision of 30%, Gedling a range from 10% to 30%, and Nottingham City 20%. The provision of affordable housing has been considered in arriving at the appropriate level of housing provision in the Core Strategies. However, section 5 sets out how the provision figures are justified by the available evidence, and the levels of affordable

¹² Includes Boroughs of Broxtowe, Erewash, Gedling and Rushcliffe, and Nottingham City. Ashfield is part of the Nottingham Outer HMA.

housing provision proposed in the Core Strategies will assist significantly in meeting identified need.

6.6 Many housing developments will fall below the thresholds for affordable housing, whilst others will be able to demonstrate that viability justifies a lower provision. In addition, some affordable housing will continue to be provided directly by providers. Setting a definitive target for affordable housing is therefore not possible, however, applying the maximum percentages currently sought to housing provision provides a target for monitoring purposes in Broxtowe, Gedling and Nottingham City . Because the approach taken by Gedling is to apply one of three percentages based on an assessment of development viability for that location, the target for Gedling is the median of these percentages. Erewash’s target is derived by applying the percentage only to all eligible SHLAA sites (see paragraph 6.12) identified across the Borough.

Table 6.2

Authority	Maximum Percentage of affordable housing	Housing Provision 2011-2028	Indicative target for monitoring purposes
Broxtowe	30%	6,150	1,845
Erewash	30%*	6,250	1,500
Gedling	20%	7,250	1,450
Nottingham	20%	17,200	3,440
Rushcliffe	30%	9,900 (to 2026)	2,970 (to 2026)
*on eligible SHLAA sites only .			

Current Practice

6.7 Strategic viability assessments have been carried out for all of the authorities looking at each authority as a whole, and individual submarkets within them. The general conclusions of these studies are similar in that there is a wide ranging picture of viability across the plan area and within individual authorities themselves. Given the wide disparities between submarkets, studies have recommended the possibility of having split targets for some authorities. They also recommend that new development of a significant scale, such as Sustainable Urban Extensions, should be considered on an individual basis as they are likely to have more specific infrastructure requirements, and are capable of forming their own housing submarkets and therefore may not be constrained in viability terms by being in or adjacent to weaker sub-markets.

6.8 Given the complex picture across the area in relation to affordable housing viability, the overall approach to affordable housing varies considerably between the Councils. Currently, the Councils’ saved policies and Local Development Documents provide for a range of percentages of affordable housing on appropriate sites and several of the Councils seek varying percentages in different parts of their areas. There are also different thresholds and sliding scales determining the mix of affordable housing required, and the provision of financial contributions, where appropriate. Due to the complex picture of viability across the area, and the range of approaches which are tailored to local circumstances, the detailed approach and mechanisms to assist

the delivery of affordable housing will be outlined in separate Local Development Documents. The policy position for each Council area is set out below.

Broxtowe Borough Council

6.9 The approach is set out in the Broxtowe Local Plan 2004 saved policy H5 which requires 25% affordable Housing on sites of over 1Ha or over 25 dwellings. The Three Dragons Viability study identified that this was missing a significant majority of housing schemes which have tended to come forward on smaller sites beneath the trigger points.

6.10 Even in weaker housing market areas and in some schemes approved since the housing crash the 25% threshold has been met and as such an indicative target of 30% Borough wide is considered to be ambitious but necessary given the acute levels of affordable housing need as identified in the 2009 SHMA. Evidence is that larger schemes (particularly of SUE scale) can remain viable with a 30% target. The details including thresholds will be set out in the Borough Councils emerging Allocations and Development Management Policies Development Plan Document.

Erewash Borough Council

6.11 The existing approach to affordable housing is set out in the Erewash Borough Local Plan Saved Policy H6 (2005) and the Supplementary Planning Document on Affordable Housing (2007). Aspects of the latter were subsequently superseded as a result of changes to national guidance, to:

- a) Alter the threshold where an affordable housing contribution is required to schemes of 15 or above units.
- b) Set out the Borough Council's preferred tenure mix on any scheme where affordable housing is to be provided to ensure 80% of these units are made available for affordable rent (meaning social rent) and 20% for affordable shared ownership housing.

6.12 This means that on sites of 15 units or greater, the Borough Council currently negotiates for up to 30% to be affordable except where viability testing highlights that the site would not be deliverable. No variation exists between the Borough's recognised housing sub-markets.

6.13 Affordable housing is normally delivered on site. However, there will be exceptional circumstances where it is felt acceptable to deliver affordable units elsewhere, normally through the agreement of a commuted sum.

Gedling Borough Council

6.14 The approach is set out in the Gedling Borough Replacement Local Plan 2005 saved policy H18 and the Supplementary Planning Document on Affordable Housing adopted in December 2009. The SPD sets a threshold of 15 dwellings (with no site area threshold). Based on an assessment of viability, the Borough Council requires the provision of different percentages in different viability sub-markets within the

Borough. 10% affordable housing is required in the Newstead and Colwick/Netherfield sub-markets; 20% affordable housing is required in the Arnold/Bestwood, Calverton and Carlton sub-markets; and 30% affordable housing is required in the Arnold/Mapperley, Bestwood St Albans, Gedling rural north and Gedling rural south sub-markets. Whilst affordable housing will normally be delivered on site, under certain circumstance this may be waived in favour of a commuted sum.

Nottingham City

6.15 The approach is set out in Nottingham City Local Plan 2005 saved policy H5 and Supplementary Planning Guidance Affordable Housing and Developer Contributions (2006). The policy sets a threshold of 25 dwellings, and a percentage of 20% on those qualifying sites as a starting point for negotiation. The 20% target is a result of the recognition of more fragile levels of development viability in the City (the 2009 SHMA recognised that the 20% level of viability was not achievable throughout the whole City area), although in most cases the level has been met. A City-wide consistent approach to affordable housing is preferred by the City Council in order to avoid distorting housing markets, and because in practice the level has proved viable throughout the City. However the policy allows for flexibility where viability has proved to be an issue.

6.16 The City Council is intending to test a lower threshold through its emerging Land and Planning Policies Development Plan Document.

Rushcliffe Borough Council

6.17 The approach is set out in the Rushcliffe Borough Non-Statutory Replacement Local Plan policy HOU7. The policy sets a threshold of 0.5 hectares or 15 dwellings or more, and a percentage of up to 30% affordable housing on these qualifying sites. Based on the high need for affordable housing identified by the SHMA and taking account of the conclusions reached in the Three Dragons Housing Viability Assessment, an overall target for the Borough of 30% is considered appropriate but with scope for a lower proportion where justified by local viability factors.

6.18 Further, more detailed affordable housing policy will be included in the Borough Council's Allocations and Development Management Policies DPD. In preparing this DPD it will be tested whether lower and/or variable (depending on geographical location) thresholds are appropriate. (This text was provided by Rushcliffe Borough Council).

Rural Areas

6.19 The Strategic Housing Market Assessment Needs Update identifies potential net need for affordable housing across submarkets in both urban and rural areas. In smaller settlements across the area where growth is not proposed, there may still be a local need for affordable housing that is justified by a robust local assessment. It is therefore considered appropriate to make provision within the Core Strategies for rural exception development, or provision to allow for the allocation of sites purely for affordable housing within smaller rural villages where affordable housing can remain affordable in perpetuity. Section 17 of the Housing Act 1996 sets out how to enable

affordable housing to remain affordable for present and future generations. The majority of rural settlements within the area that have a population of around 3,000 or below will qualify for developments of local needs housing under this policy.

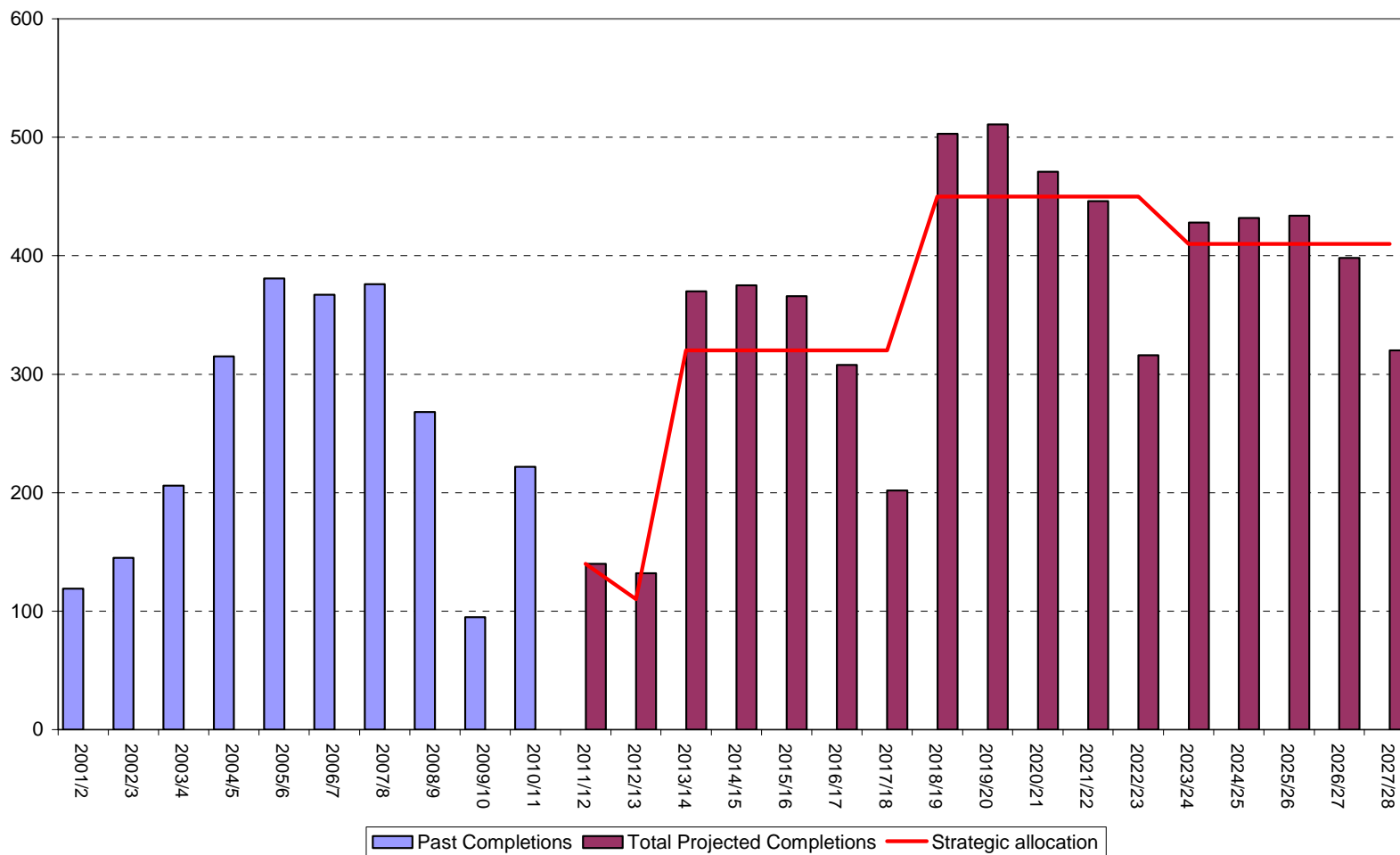
7 Conclusions

7.1 The factors outlined above have led the Councils to conclude that the delivery of the housing provision figures included in the Aligned Core Strategies by 2028 will be extremely challenging. However, it is based on objective evidence and provides for the needs of the housing market area as a whole, allowing for continued economic and job growth. Assuming an early return to good housing market conditions, the provision levels are considered to be achievable.

7.2 Section 5 sets out why a lower housing provision is not considered to be appropriate for the area in that it does not meet objectively identified needs, and that a higher figure is not only not supported by the evidence, it would simply be undeliverable, rendering the Core Strategies ineffective.

Appendix A – Housing Trajectories (note that the charts are not to the same scale)

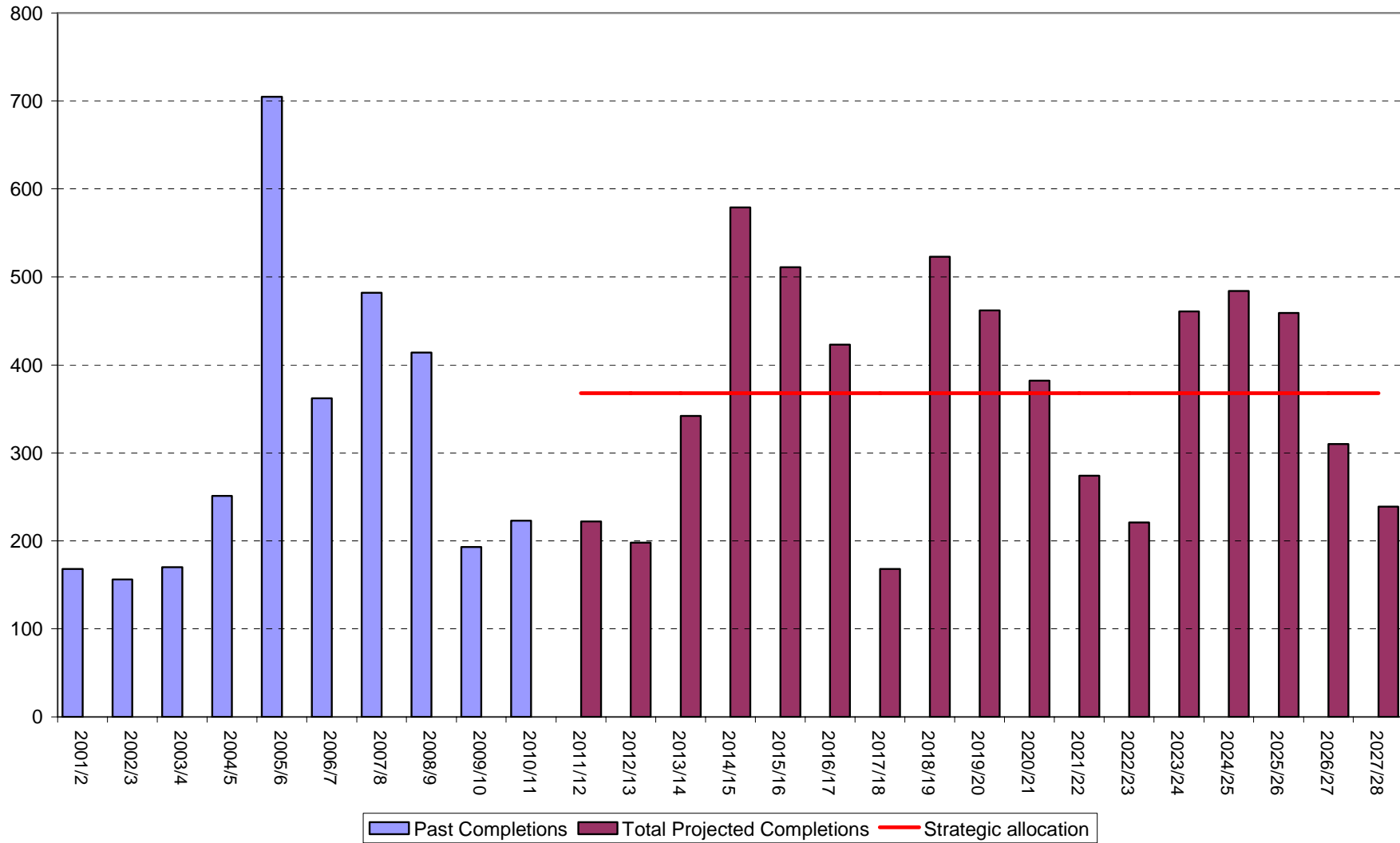
Broxtowe



Broxtowe table

	2011/12	2012/13	2013/14	2014/15	2015/16	2016/17	2017/18	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2011/28
Boots/Severn Trent								80	80	80	105	105	25	25	25	25		550
Field Farm			50	100	100	100	100											450
Awsworth allocations								30	30	33	33	30	30	30	30			246
Awsworth SHLAA sites	1		28	27	35	13												104
Brinsley allocations								11	11	11	11	11	21	21	22	22	22	163
Brinsley SHLAA sites		7	4	3	1			1						5	5	5	6	37
Eastwood allocations													31	31	31	31	31	155
Eastwood SHLAA sites	98	50	146	152	119	87	80	134	97	72	60	50						1,145
Kimberley allocations								10	10	10	10	10	55	55	55	54		269
Kimberley SHLAA sites	1	11	31	13	32	32	16	36	44	45	40	6	8	8	8			331
Nottingham Urban Area allocations								26	26	26	26	26	188	188	188	189	189	1,072
Nottingham Urban Area SHLAA sites	40	64	109	78	79	76	6	175	213	194	161	78	10	10	11	12	12	1,328
Other sites deliverable by 2028 (taken from Strategic Housing Land Availability) - in urban area																		0
Other sites deliverable by 2028 (taken from Strategic Housing Land Availability) - other villages			1	1														2
Windfall allowance after 10 years													60	60	60	60	60	300
Demolitions																		0
Total Projected Completions (net)	140	132	369	374	366	308	202	503	511	471	446	316	428	433	435	398	320	6,152
Cumulative Completions	140	272	641	1,015	1,381	1,689	1,891	2,394	2,905	3,376	3,822	4,138	4,566	4,999	5,434	5,832	6,152	6,152
PLAN - Strategic Allocation (annualised)	140	110	320	320	320	320	320	450	450	450	450	450	410	410	410	410	410	6,150
PLAN - Strategic Allocation (cumulative)	140	250	570	890	1,210	1,530	1,850	2,300	2,750	3,200	3,650	4,100	4,510	4,920	5,330	5,740	6,150	6,150
MONITOR - No. dwellings above or below cumulative allocation	0	22	71	125	171	159	41	94	155	176	172	38	56	79	104	92	2	2
MANAGE - Annual requirement taking account of past/projected completions	362	376	392	394	395	397	406	426	417	406	396	388	402	396	384	358	318	-

Erewash

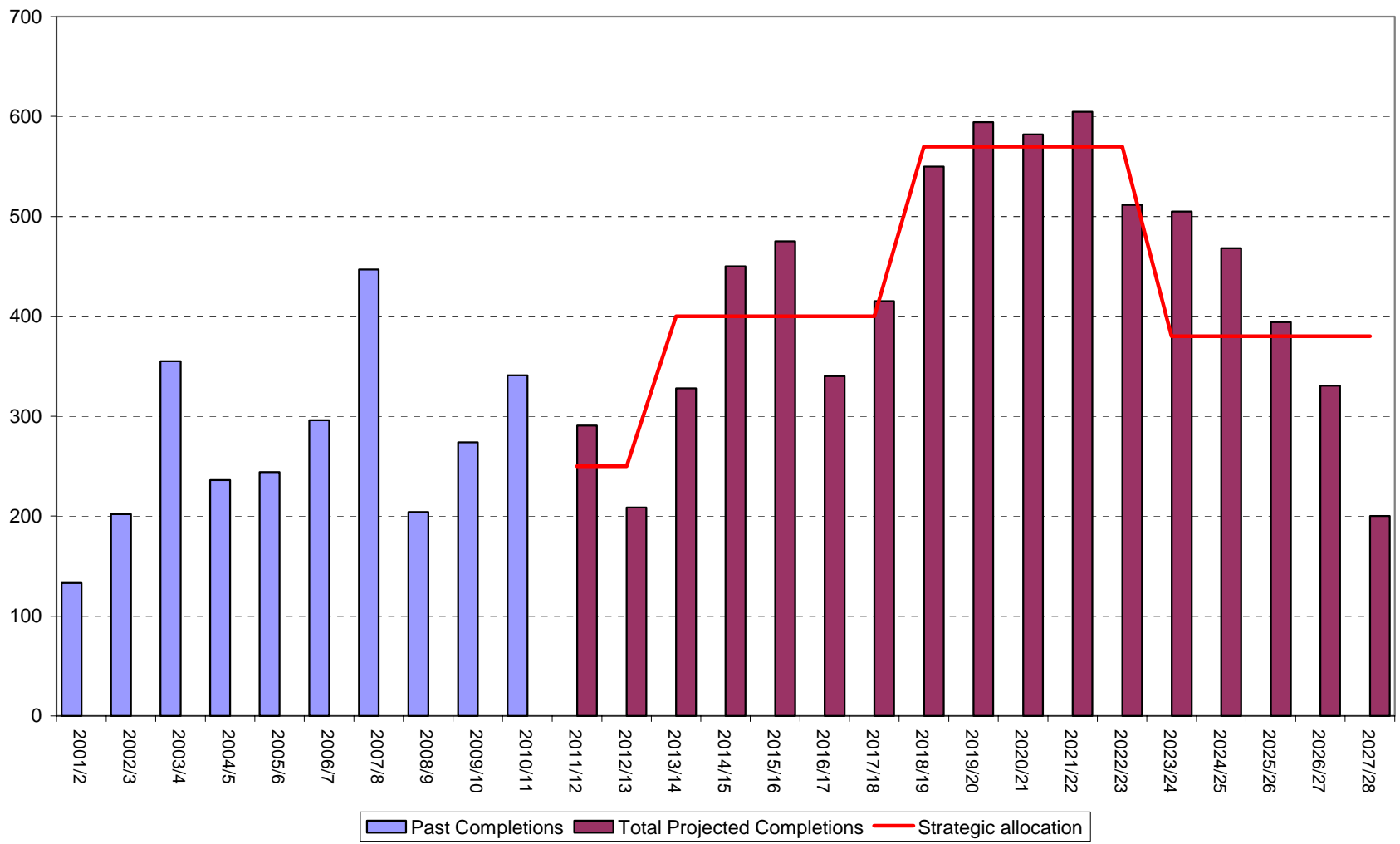


Erewhash table

	2011/12	2012/13	2013/14	2014/15	2015/16	2016/17	2017/18	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2011/28
Stanton Regeneration Site (2000)								200	200	200	200	200	200	200	200	200	200	2,000
Other sites deliverable by 2028 (taken from SHLAA)	222	198	342	579	511	423	168	323	262	182	74	21	261	284	259	110	39	4,258
Windfall allowance after 10 years																		0
Demolitions																		0
Total Projected Completions (net)	222	198	342	579	511	423	168	523	462	382	274	221	461	484	459	310	239	6,258
Cumulative Completions	222	420	762	1,341	1,852	2,275	2,443	2,966	3,428	3,810	4,084	4,305	4,766	5,250	5,709	6,019	6,258	6,258
PLAN - Strategic Allocation (annualised)	368	368	368	368	368	368	368	368	368	368	368	368	368	368	368	368	368	6,256
PLAN - Strategic Allocation (cumulative)	368	736	1,104	1,472	1,840	2,208	2,576	2,944	3,312	3,680	4,048	4,416	4,784	5,152	5,520	5,888	6,256	6,256
MONITOR - No. dwellings above or below cumulative allocation	-146	-316	-342	-131	12	67	-133	22	116	130	36	-111	-18	98	189	131	2	2
MANAGE - Annual requirement taking account of past/projected completions	368	377	389	392	378	367	362	381	366	354	349	362	390	373	335	274	237	-

The strategic allocation is provisional, subject to approval of the Core Strategy by the Borough Council meeting on 21st June 2012.

Gedling



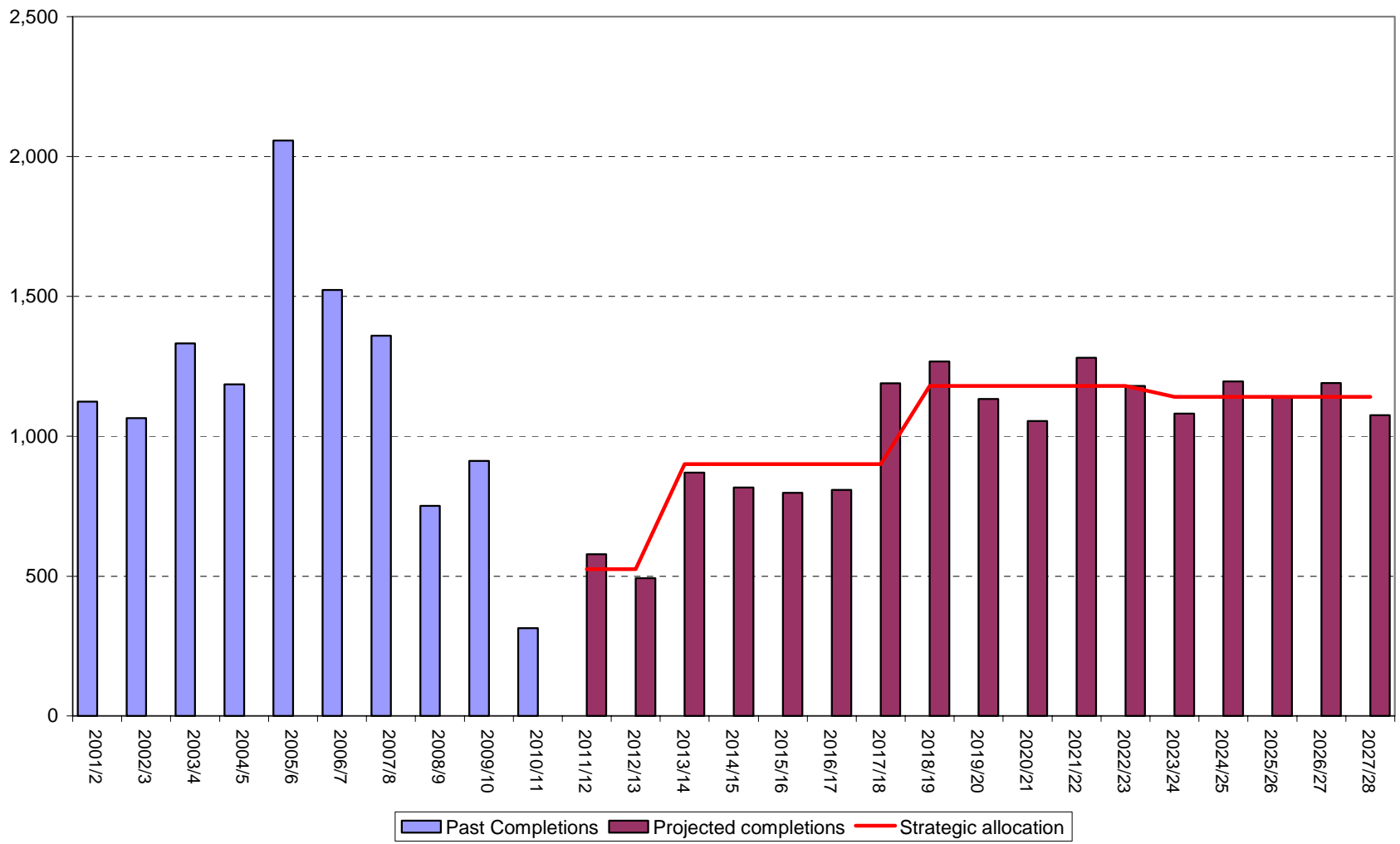
Gedling table

	2011/12	2012/13	2013/14	2014/15	2015/16	2016/17	2017/18	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2011/28
Top Wighay Farm								40	40	40	140	140	140	140	140	140	140	1,100
North of Papplewick Lane											100	100	100	100	100	100		600
Gedling Colliery/Chase Farm																		0
Bestwood Village	32			50	70	77	90	99	90	90	90	90	90	97	50			1,015
Calverton	19	17	74	75	75	32	62	94	180	206	255	235	190	140	123	100	49	1,926
Ravenshead	46	20	1		19	7	16	101	111	99	57							477
Other sites deliverable by 2028 (taken from Strategic Housing Land Availability) - in urban area	222	201	302	392	373	250	271	217	197	186	33	3		1			1	2,649
Other sites deliverable by 2028 (taken from Strategic Housing Land Availability) - other villages	15	2			9	25	38	81	65	48	20	20	20	20				363
Windfall allowance after 10 years													40	40	40	40	40	200
Demolitions																		0
Total Projected Capacity (net)**	334	240	377	517	546	391	477	632	683	669	695	588	580	538	453	380	236	8,330
Total Projected Completions (net)	291	209	328	450	475	340	415	550	594	582	605	512	505	468	394	331	200	7,250
Cumulative Completions	291	500	828	1,278	1,753	2,093	2,508	3,058	3,653	4,235	4,840	5,351	5,856	6,324	6,719	7,049	7,250	7,250
PLAN - Strategic Allocation (annualised)	250	250	400	400	400	400	400	570	570	570	570	570	380	380	380	380	380	7,250
PLAN - Strategic Allocation (cumulative)	250	500	900	1,300	1,700	2,100	2,500	3,070	3,640	4,210	4,780	5,350	5,730	6,110	6,490	6,870	7,250	7,250
MONITOR - No. dwellings above or below cumulative allocation	41	0	-72	-22	53	-7	8	-12	13	25	60	1	126	214	229	179	0	0
MANAGE - Annual requirement taking account of past/projected completions	426	435	450	459	459	458	469	474	466	450	431	402	380	348	309	266	201	-

** All suitable sites have been included to give a theoretical maximum number of dwellings that can be provided in Gedling Borough. This theoretical figure is 8,330 dwellings (i.e. 12.97% higher than the housing target of 7,250).

The annual projected completions have then been reduced by 12.97% to provide annual completions projections to deliver the housing target of 7,250. Final proposed figures are shown in Policy 2 of the Aligned Core Strategies.

Nottingham



Nottingham table

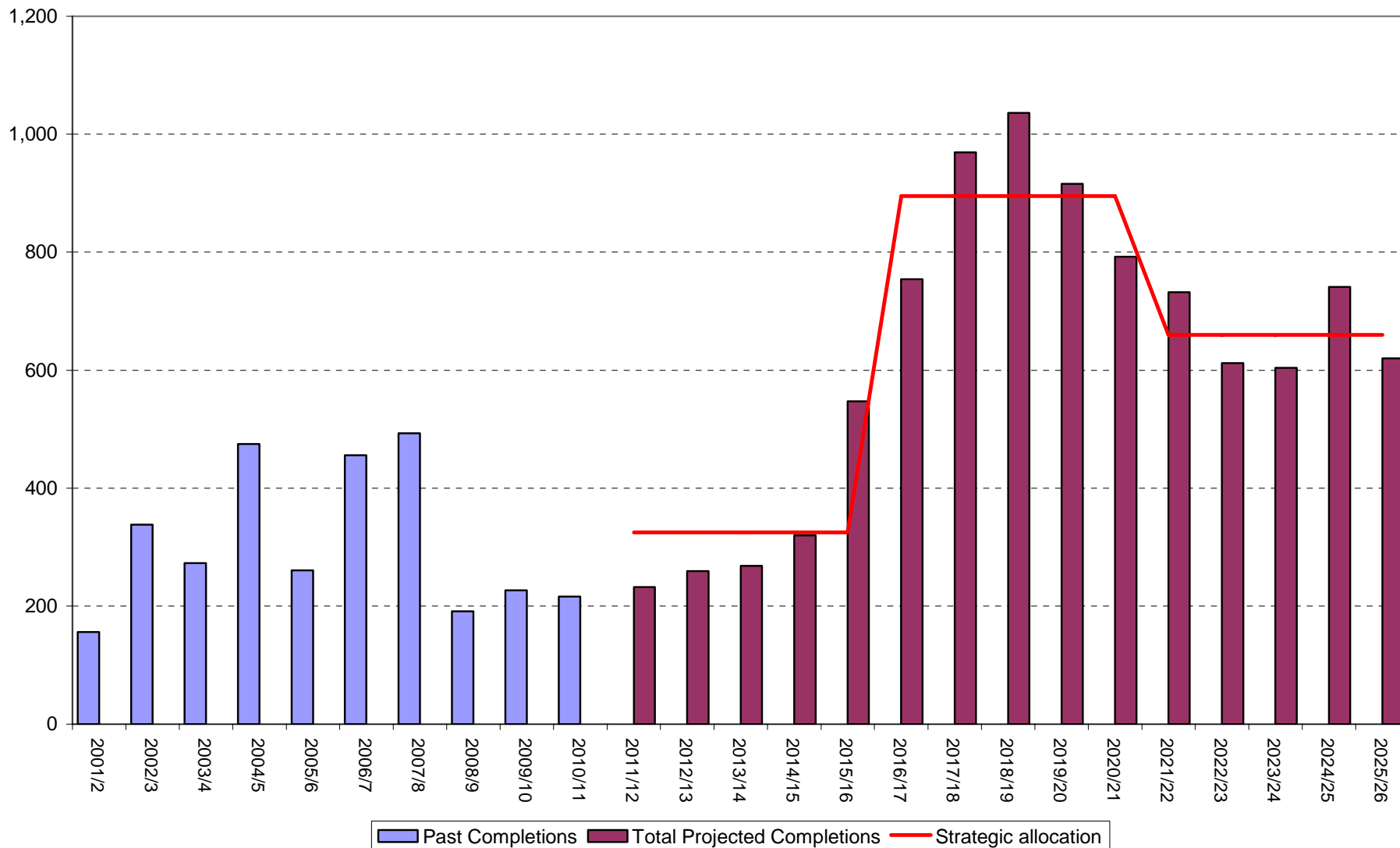
	2011/12	2012/13	2013/14	2014/15	2015/16	2016/17	2017/18	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2011/28
Waterside (3,000)							12	13	154	154	154	282	304	487	591	482	374	3,007
Boots Campus (600)											100	100	100	100	100	100		600
Stanton Tip (500)								100	100	100	100	100						500
Other sites deliverable by 2028 (taken from Strategic Housing Land Availability Assessment)	876	795	1,192	963	818	828	1,197	1,174	900	821	797	568	517	439	277	438	531	13,131
Windfall allowance after 10 years											150	150	180	190	190	190	190	1,240
Demolitions	-298	-302	-322	-146	-20	-20	-20	-20	-20	-20	-20	-20	-20	-20	-20	-20	-20	-1,328
Projected completions (net)	578	493	870	817	798	808	1,189	1,267	1,134	1,055	1,281	1,180	1,081	1,196	1,138	1,190	1,075	17,150
Cumulative Completions	578	1,071	1,941	2,758	3,556	4,364	5,553	6,820	7,954	9,009	10,290	11,470	12,551	13,747	14,885	16,075	17,150	17,150
PLAN - Strategic Allocation (annualised)	525	525	900	900	900	900	900	1,180	1,180	1,180	1,180	1,180	1,140	1,140	1,140	1,140	1,140	17,150
PLAN - Strategic Allocation (cumulative)	525	1,050	1,950	2,850	3,750	4,650	5,550	6,730	7,910	9,090	10,270	11,450	12,590	13,730	14,870	16,010	17,150	17,150
MONITOR - No. dwellings above or below cumulative allocation	53	21	-9	-92	-194	-286	3	90	44	-81	20	20	-39	17	15	65	0	0
MANAGE - Annual requirement taking account of past/projected completions	1,009	1,036	1,072	1,086	1,107	1,133	1,162	1,160	1,148	1,150	1,163	1,143	1,136	1,150	1,134	1,133	1,075	-

Although the deliverable sites are those included in the Strategic Housing Land Availability Assessment (SHLAA), other sites may be identified in the course of the preparation of the Local Plan (Land and Planning Policies document). Likewise, the Local Plan preparation process may result in some of the SHLAA sites not being taken forward as allocations.

Although windfall sites are not included until after the first ten years, it is very likely, based on the City's past performance, that a significant number of windfall sites will come forward and be developed before then. This will provide a contingency against lack of delivery of housing on other sites.

Purpose-built student units (dwellings) are included in the figures, including the Aligned Core Strategies strategic allocation, in line with current CLG definitions (see para. 3.7).

Rushcliffe



Rushcliffe table

	2011/12	2012/13	2013/14	2014/15	2015/16	2016/17	2017/18	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2011/26
Land at Melton Road, Edwalton (1200)		50	100	100	150	150	150	150	150	150	50					1,200
Land at Former Cotgrave Colliery (470)				50	50	100	100	100	70							470
Land at Former RAF Newton Phase 2 (550)					50	50	100	100	100	100	50					550
Land North of Bingham (1000)					50	50	100	100	100	100	100	100	100	100	100	1,000
East Leake (400)								50	50	50	50	50	50	50	50	400
Keyworth (450)							50	50	50	50	50	50	50	50	50	450
Radcliffe on Trent (400)								50	50	50	50	50	50	50	50	400
Ruddington (250)								30	30	30	30	30	30	30	40	250
Land South of Clifton (2500)					125	125	250	250	250	250	250	250	250	250	250	2,500
Sites deliverable within first 15 years (Taken from Strategic Housing Land Availability Assessment)	232	209	168	170	122	279	219	156	66	12	40	20	12	149	18	1,872
Windfall allowance after 10 years											62	62	62	62	62	310
Total Projected Completions (net)	232	259	268	320	547	754	969	1,036	916	792	732	612	604	741	620	9,402
Cumulative Completions	232	491	759	1,079	1,626	2,380	3,349	4,385	5,301	6,093	6,825	7,437	8,041	8,782	9,402	9,402
PLAN - Strategic Allocation (annualised)	325	325	325	325	325	895	895	895	895	895	660	660	660	660	660	9,400
PLAN - Strategic Allocation (cumulative)	325	650	975	1,300	1,625	2,520	3,415	4,310	5,205	6,100	6,760	7,420	8,080	8,740	9,400	9,400
MONITOR - No. dwellings above or below cumulative allocation	-93	-159	-216	-221	1	-140	-66	75	96	-7	65	17	-39	42	2	2
MANAGE - Annual requirement taking account of past/projected completions	553	573	594	617	640	648	638	605	557	512	472	429	393	340	206	-