

EXAMINATION – MATTERS AND QUESTIONS BROXTOWE LOCAL PLAN PART 2 EXAMINATION

STATEMENT ON BEHALF OF: HARWORTH GROUP (Respondent 2607)

MATTER 4: Housing Delivery, Trajectory and Land Supply

Pegasus Group



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MATTER 4: Housing Delivery, Trajectory and Land Supply

ISSUE: Whether the approach to the provision of housing is justified, positively prepared, effective, deliverable and consistent with the NPPF and the Aligned Core Strategy.

- 1. Does the Plan provide sufficient deliverable housing sites to meet the housing requirements of the borough to 2028? Does it accord with the spatial distribution set out in the ACS?
- 2. Does the Plan provide sufficient choice and flexibility of sites to meet current and future housing needs?
- 4.1 Table 3 of the Part 2 Local Plan sets out the housing supply position for the period 2011-2028, taking account of the houses to be delivered on allocations in the Part 2 Plan. This shows an overall provision of some 6,950 against the Aligned Core Strategy requirement of a minimum of 6,150 dwellings. The resulting distribution is broadly consistent with the Aligned Core Strategy.
- 4.2 As a result of the Part 2 Plan allocations more development is directed to the Main Built up Area and slightly less provision is made for the Eastwood and Kimberley. For Awsworth, the allocation of land west of Awsworth for some 250 dwellings provides for a total of 355 dwellings against a Core Strategy requirement of up to 350 dwellings.
- 4.3 The Part 2 Plan provides for a range of housing sites including 8 site allocaitons in the Main Built up Area from 12 to 500 dwellings in size, along with site allocations in the larger settlements of Awsworth, Brinsley, Eastwood and Kimberley. This provides for a range of sites both in terms of size and location to meet housing needs over the plan period.
 - *3.* Should the housing sites denoted as Housing Commitments on the Policies Map form allocations in this Plan?

No comment.

- 4. Is the Housing Trajectory realistic? Are the assumptions with regard to delivery and build out rates justified by the available evidence?
- 5. The Trajectory illustrates a shortfall of delivery in the early stages of the Plan period but a much higher annual delivery towards the latter stages. Is there a need for a flexible approach to maximise delivery in the early years of the Plan? Is a delivery of over 1000 dwellings per year in 2020/21 2023/24 realistic and achievable bearing in mind past delivery rates and the local housing market?
- 4.4 The Housing Trajectory for the Part 2 Plan is set out at Table 5 in the Submission Version of the Plan. For the land west of Awsworth, the trajectory assumes development commencing in 2020/21 with the completion of 50 dwellings, rising to 100 dwellings in 2021/22 and 2022/23.
- 4.5 Harworth Group are progressing with work to prepare for the submission of an application for development on the site on adoption of the Part 2 Plan. Technical work is well advanced and initial discussions have been



held with potential housebuilders. The Council's trajectory for the site represents a reasonable assessment of likely delivery rates.

- 6. If allocated sites do not come forward as anticipated, in particular the sustainable urban extensions, does the Plan adequately set out potential contingency measures? Is sufficient consideration given to monitoring and triggers for review?
- 7. What is the current position with regard to five year housing land supply? Is the methodology for the calculation of the 5 year housing land supply appropriate? In particular should the buffer also be applied to the shortfall?
- 4.6 The overall provision set out through the Part 2 Plan exceeds the Core Strategy requirement by some 13%. This provides a degree of built in flexibility should sites not come forward as expected. For the land west of Awsworth, Harworth Group are fully committed to bringing the site forward for development at the earliest opportunity following the adoption of the plan and the removal of the site from Green Belt.
- 4.7 Table 5 of the Submission version of the Part 2 Plan shows expected completions of 3,716 dwellings for the five year period 2018-2023. This represents some 5.15 years supply applying the Sedgefield approach and applying the buffer to both the requirement and buffer. This approach has been accepted by Inspectors in a number of appeals as the correct approach.
 - 8. How have site densities been determined? Are they reasonably accurate?
- 4.8 For the land west of Awsworth, applying a 60% gross to net discount to the 12 hectare allocation site would provide a net developable area of some 7.2 hectares. At a density of 35 dwellings per hectare, some 250 dwellings on the site can be achieved. The Part 2 Plan's assessment of the potential development numbers on the site is therefore reasonable. Work undertaken by Harworth Group on initial masterplanning confirms that up to 250 dwellings can be provided on the site.
 - 9. How are windfall sites defined? Is the windfall allowance included in the supply trajectory appropriate having regard to the historic rate of windfall delivery in the borough? Should windfalls be included in the early years (ie. the first 2 years) of the supply calculation?
 - 10. Based on the available evidence is the lapse rate appropriate?

No comment.