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Aspbury Planning on behalf of D.W & J.W.E Wild

ID ref -634

Representations to Broxtowe Local Plan Part 2
Inspector's Matters, Issues and Questions

**Matter 4 – Housing Delivery, Trajectory and
Land Supply**

Matter 4

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?

It is the respondent's view that the plan fails to provide sufficient housing sites for the Key Settlement of Kimberley to accord with the spatial distribution set out in the ACS. The ACS proposes up to 600 dwellings for Kimberley and the under provision (set out at Table 3) at 532 dwellings is considered to be significant. Moreover, the respondent is of the view that there are major question marks against the credible deliverability of much of the planned housing supply for Kimberley.

Table 3 sets out the composition of the alleged housing supply of 532 dwellings. We have not corroborated but do not challenge the alleged 102 completions from 2011. We do however challenge the deliverability of all three allocated sites which contribute a total of 180 dwellings, yet note that these sites will be considered individually in responses to Matter 9. The residual housing delivery of 250 dwellings to make up the overall 532 total is to come from extant permissions and other deliverable urban sites as detailed in the 2017/18 SHLAA – Document H0/02.

Page 27 of the SHLAA sets out assessed sites within Kimberley and the first part of the table identifies the 'deliverable and developable' sites. The Council's assessment considers that 146 dwellings will come forward between 2018-2023 on these sites and a further 187 dwellings from 2023-2028, totalling 333 dwellings within the urban area. However, SHLAA sites 772 & 773 are part of the Kimberley Depot allocation and sites 140 & 144 comprise the allocated sites of the Builders Yard and land south of Eastwood Road respectively. To avoid double counting of the site allocations in the calculation of the overall supply for Kimberley, then the amount of deliverable and developable dwellings (excluding allocations) reduces from 333 to 250, which corresponds to the figure set out in Table 3 of the Local Plan.

The point to be drawn from the above is that the delivery of even 532 dwellings on identified sites in Kimberley in the plan period to 2028 relies not only on full delivery of the allocations, but the complete delivery of every single dwelling on every site listed in the Deliverable and Developable section of the Kimberley SHLAA, without any factored allowance for delay and /or under delivery on allocated sites or lapsed permissions. With many respondents also stating concerns about the delivery of the allocated sites in Kimberley, there is a clear view that even 532 dwellings is an unrealistic and unachievable without further site release from other SHLAA sites in the 'Could be suitable if policy changes' category which will inevitably involve further Green Belt release.

2. Does the Plan provide sufficient choice and flexibility of sites to meet current and future housing needs?

From the perspective of Kimberley, there is insufficient choice and no flexibility to meet current and future housing needs. In fact there is substantial under provision against the targets of the ACS to reflect the Key settlement status of Kimberley.

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?

We consider that the trajectory is unrealistic in a number of areas

1. The trajectory is assumes early and high delivery from all its strategic sites starting in 2020. This is considered way too optimistic and allows insufficient time for implementation of advance infrastructure. The commencement of delivery from these sites should be set back by at least a year.
2. The trajectory assumes 100 dwellings per annum coming from both sites east and west of Coventry Lane in 2020/21 and 21/22. These site are in immediate proximity to each other and it is completely unrealistic that 400 dwellings will come off these two sites in a two year period. These dwellings should realistically be spread over a significantly longer timeframe up to 2027/28.
3. Awsorth is secondary market location and the assumption for 100 dwellings per annum is overly optimistic. A delivery rate of 60 per annum based on two builders on site together would be more realistic.
4. Eastwood is a secondary market location and the assumption for 50 dwellings per annum is overly optimistic unless the site is capable of being developed by two builders on site together.
5. In respect of Kimberley, there is little or no evidence to support the delivery assumptions on any of the allocated sites. This is addressed in detail in responses to matter 9.

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?

We consider that further deliverable site release is needed to increase completions in the earlier years of the plan, particularly as the plan has only 10 years to run and reliance upon a back phased delivery strategy with such a limited timespan to the end date of the plan is highly susceptible to failure. A delivery of over 1000 dwellings per annum in three out of four years is completely unprecedented and unrealistic and brings into question whether the alleged 1100 dwelling oversupply in the plan period to 2028 is also unrealistic.

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?

The local plan has no credible contingency. Most of the delivery and indeed alleged flexibility against the 6150 dwelling local plan requirement comes from sustainable urban extensions yet to commence and with high annual delivery rates. The potential for delay and under delivery against the trajectory is high and there are no fallback or reserve sites proposed.

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?

It is generally accepted and established through legal case law that the 20% buffer should be applied to the shortfall.

8. How have site densities been determined? Are they reasonably accurate?

Many of the site capacities appear to have been calculated on a pro rata basis of 35 -40 dwellings per hectare based on site area with no account for any irregular shaped site boundaries or adjoining development. This is certainly the case for allocations 7.2 and 7.3 at Kimberley which are retained from the 2004 local plan and based on 40 dpa. There are no schematic layouts to demonstrate capacity on any of the Kimberley allocations and so the density/ capacity assumptions are not likely to be accurate.

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?

No comment.

10. Based on the available evidence is the lapse rate appropriate?

No comment



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