

EXAMINATION OF BROXTOWE LOCAL PLAN PART 2
MATTER 4 – HOUSING DELIVERY, TRAJECTORY AND LAND SUPPLY

Inspector’s issues and questions in bold type.

This Hearing Statement is made for and on behalf of the HBF which should be read in conjunction with our representations to the pre-submission Local Plan Part 2 consultation dated 3rd November 2017. This representation answers specific questions as set out in the Inspector’s Matters, Issues & Questions document.

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?

The Housing Trajectory in Table 4 shows an overall Housing Land Supply (HLS) of 6,746 dwellings against a housing requirement of 6,150 dwellings to 2027/28. This HLS comprises of :-

- 2,456 dwellings (36%) from non-strategic LPP2 housing site allocations
- 1,000 dwellings (15%) from strategic ACS housing site allocations
- 2,991 dwellings (44%) from SHLAA sites
- 300 dwellings (5%) from windfalls
- 6,746 dwellings (100%) TOTAL

Although the Broxtowe Local Plan Part 2 (LPP2) is being examined under the 2012 NPPF from the date of adoption the Council’s HLS will be assessed under the 2018 NPPF therefore it is important to consider the Council’s HLS against the 2018 NPPF definition of deliverable as set out in the Annex 2 Glossary. For a housing site to be deliverable it should be available now, offer a suitable location for development now and be achievable with a real prospect that housing will be delivered on the site within five years. Housing sites with outline planning permission, permission in principle, allocated in the ACS / LPP2 or identified on a brownfield register should only be considered deliverable where there is clear evidence that housing completions will begin within five years. From the Council’s evidence set out in the SHLAA 2017/18 there are 1,747 dwellings (26% of overall HLS) which are on strategic site allocations or for which planning permission is pending but not granted or acceptable in principle (see Table 23 SHLAA 2017/18) included in the plan period 2018/19 – 2022/23. These sites should only be considered deliverable rather than developable if the Council provides compelling supporting evidence that housing completions will be delivered within the next five years (also see answer to Q7). Under these circumstances the HBF considers that

the LPP2 provides insufficient deliverable housing sites to meet the housing requirement by 2027/28.

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

The LPP2 is focussed on sites of more than 150 dwellings (43% of non-strategic site allocations / 80% of dwellings on non-strategic site allocations), previously developed land (71% of non-strategic site allocations / 62% of dwellings on non-strategic site allocations) and locations within the Main Built Up Area (57% of non-strategic site allocations / 71% of dwellings on non-strategic site allocations) which inevitably restricts choice and flexibility. The HBF consider that more diversification in the Council's overall HLS is required to meet current and future housing needs. A wider range of sites by size and market location maximises housing supply because small local, medium regional and large national house building companies have access to suitable land to deliver a variety of different products. All households should have access to housing to meet their needs the Council should ensure that appropriate sites are allocated to meet specifically identified housing needs including for older people and self / custom build.

4. Is the Housing Trajectory realistic? Are the assumptions with regard to delivery and build out rates justified by the available evidence?

The housing trajectory shows completions from site allocations starting in 2018/19. It is noted that 7 non-strategic housing site allocations (50%) are on previously developed land (PDL) and 3 non-strategic site allocations (21%) are both PDL / greenfield which may have prolonged lead in times before housing development commences due to remediation works. Similarly any housing development dependant on land released from the Green Belt when the LPP2 is adopted may have a time lag post adoption whilst necessary planning permissions are sought delaying housing completions. In both these circumstances housing completions are unlikely to occur in 2018/19 or 2019/20.

It is also noted that delivery rates look to be very generically based on a build out rate of 50 dwellings per annum. There are a variety of historic build out rates set out in SHLAA 2017/18 which identify an average of 27 dwellings per annum on sites of 10 or more dwellings (Table 7), an average of 42 dwellings per annum on sites of 50 or more dwellings (Table 8) and an average of 25 dwellings per annum for affordable housing delivery (Table 9). However without a breakdown of individual sites in the housing trajectory it is impossible to assess the realism of the housing trajectory against this supporting evidence. The locational focus of strategic site allocations, non-strategic site allocations and SHLAA sites in the Main Built Up Area (66% of overall HLS) may have an influence on the absorption rates of individual sites which may impact on the actual build out rates achieved.

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 Council's overall HLS is dependant on 36% (2,456 dwellings) from non-strategic site allocations and a further 15% (1,000 dwellings) from strategic site allocations if delivery is not as anticipated then contingencies will be needed. Currently there is only limited headroom or contingency of circa 10% (597 dwellings) in the overall HLS which may be easily eroded by adjustments to lead in times, delivery rates, lapse rates and windfall allowance. For example if the lapse rate of 9% applied to the 5 YHLS has not been applied to the overall HLS or if actual delivery rates are less than the generic 50 dwellings per annum. As the Council's HLS is highly dependent upon a few large strategic site allocations, previously developed land and one geographical location focussed on the Main Built Up Area rather than a more diversified HLS greater numerical flexibility than circa 10% is necessary. The HBF suggest at least 20%. The Council should consider allocating more non-strategic sites, identifying deliverable reserve sites subject to appropriate release mechanisms and allowing development of unallocated sites adjacent to settlements if a 5 YHLS cannot be demonstrated. The Council has given insufficient consideration 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?

As set out in SHLAA 2017/18 the Council's 5 YHLS for 2018/19 – 2022/23 is calculated as :-

- 3.9 years using Sedgefield and 20% buffer applied to only the stepped housing requirement ;
- 4.4 years using Liverpool and 20% buffer applied to only the stepped housing requirement.

The LPP2 is unsound without a 5 YHLS on adoption.

The methodology is not appropriate because :-

- 20% buffer should be applied to both the stepped housing requirement and the shortfall ;
- the windfall allowance of 40 dwellings per annum should not be applied for 5 years in full which risks double counting in the early years ;
- there are 1,747 dwellings which are on strategic site allocations or for which planning permission is pending but not granted or acceptable in principle (see Table 23 SHLAA 2017/18) using the 2018 NPPF definition of deliverable these sites should only be included if supported by compelling evidence that completions will happen in the next five years (also see answer to Q1).

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?

There is some inconsistency in the windfall allowance used. The housing trajectory in Table 4 of the submission LPP2 includes a windfall allowance of 30 dwellings per annum whilst the latest 5 YHLS calculation in the SHLAA 2017/18 uses a windfall allowance of 40 dwellings per annum. Whatever the correct figure windfalls should not be included in the early years of the housing trajectory or the 5 YHLS calculation in order to avoid double counting.

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

The 9% lapse rate is appropriate. The Council should clarify that the rate has been applied to both the overall HLS and 5 YHLS.