

Home Builders Federation

Matter 7

WEST BERKS LOCAL PLAN EXAMINATION

Matter 7: Housing Land Supply

Q7.1. Are the Council's proposed modifications to the reasoned justification to policy SP12 aimed at clarifying the overall housing land supply necessary to make the Plan sound and are they, in principle (irrespective of the figures), effective in that regard?

The HBF consider it to be necessary to modify the plan to include an accurate picture of the supply of new homes expected to come forward over the plan period. However, any amendments to supply estimates in the supporting text will need to be consistent with the latest evidence set out in EXAM12 and the council will also need to update the trajectory at Appendix 8.

Q7.2. Is the assumption that a total of 2,570 dwellings will be completed in the plan period on the 15 allocations retained from existing plans justified?

No comment

Q7.7. Is the assumption that a total of 80 dwellings will be completed in the plan period on sites to be allocated in the Hungerford and Lambourn neighbourhood plans, or through other opportunities identified by the Council, justified?

No comment

Q7.8. Does a windfall allowance of 140 dwellings per year represent a reliable source of supply having regard to the strategic land availability assessment, historic delivery rates and expected future trends?



The HBF welcomes the Council's decision not to include an allowance for large and medium sites within its windfall estimates. These cannot be relied on to come forward as they have in the past with many of the sites that may have come forward as windfall being allocated as part of this local plan. The small site allowance of 140 dpa included is based on the past average rate of delivery but is notable that in the last five years the average is significantly lower than in previous years. This suggests that there may be fewer homes come forward on such sites over the plan period and that a slight reduction may be necessary.

Five year housing land requirement and supply

Q7.9. If the housing requirement range of 513 to 538 dwellings per year in policy SP12 is justified, what was the five year requirement on 1 April 2022?

For council.

Q7.10. Is the Council's assessment that there was a deliverable supply of 3,448 dwellings on 1 April 2022 justified? In particular:

(a) Is there clear evidence to demonstrate that any of the 2,922 dwellings on sites with full permission or outline planning permission for fewer than 10 dwellings will not be delivered by 31 March 2027?

(b) Is there clear evidence to demonstrate that 200 dwellings will be delivered by 31 March 2027 on SP16 Sandford Park which has outline permission for 1,080 dwellings?

(c) Is the inclusion of 57 dwellings based on communal accommodation justified?

(d) Is the inclusion of a windfall allowance of 269 dwellings justified?

On the basis of the Council's latest housing supply estimates the five year land supply on 1 April 2022 was 6.9 years using 513 dpa and 6.6 years using the Sedgfield method advocated in PPG.

However, it is necessary to consider whether the local plan has a five year land supply on adoption. This is particularly important given that this is the test set out in the December 2023 NPPF. Whilst this plan is not being examined against that plan on adoption that is the consideration that will be applied to this plan in relation to housing

delivery and the need to update annually its five year housing land supply. It is also essential that the Council has a robust five year land supply on adoption given that for the first five years of the plan following adoption it will not need to show it has a five year land supply. For this local plan the likely adoption date will be in the 2024/25 monitoring year.

However, it is not possible to state whether the council will have a five year land supply on adoption as the Council do not appear to have published a full trajectory to reflect the amended delivery expectations for the years 2023/24 to 2027/28, and which will in all likelihood mean annual delivery expectations across the plan period will also change. If the delivery expectations in Table 4.1 are used and the annual supply for 2028/29 are used, then the five year land supply on adoption using the Sedgefield method would be 5.2 years. Though should the delivery expectations in 2028/29 be lower than set out in the published trajectory then the Council would not be able to show they had a five year land supply on adoption. Therefore, the Council must provide an updated trajectory for the whole plan period in their statements that can be properly considered by all parties at the relevant hearing session.

Q7.11. Does the housing trajectory demonstrate that a supply of specific, deliverable sites sufficient to provide a minimum of five years' worth of housing against the housing requirement in the Plan will be maintained annually?

As set out above the council will need to update its housing land supply trajectory for the plan period, currently set out in appendix 10 of HOU6, to reflect the changing supply assumptions in the first five years of the plan as outlined in EXAM12. This amends the supply estimates for years 2023/24 to 2027/28 reducing supply during this period from 2,975 in HOU6 to 2,688. The amendments made in preparing EXAM12 will have consequential impacts for future years and an update to the table at Appendix 10 in HOU6 will be necessary prior to the hearing sessions. The HBF will make any comments on delivery across the plan period at the hearings following the publication of the updated trajectory.

7.9 Overall housing supply for the plan period

Q7.12 (a) Does the Plan need to be modified to identify additional deliverable sites and/or developable sites and/or broad locations in order to be consistent with national

policy relating to meeting housing need? (b) If so, what would be reasonable alternatives in the context of the spatial strategy set out in policy SP1?

The council have set a target of delivering between 9,747 and 10,222 homes across the extended plan period. To meet these needs the Council have identified supply to deliver a further 9,577 homes – between 170 and 645 short of either end of their range. The HBF would suggest that additional deliverable sites are needed to ensure that the plan is positively prepared and as a minimum musty meet the areas objectively assessed needs for development.

Mark Behrendt MRTPI

Planning Manager – Local Plans SE and E