



THE HOME BUILDERS FEDERATION

Date: 29th October 2015
Consultee ID: 707
Matter: 3b

SEFTON LOCAL PLAN EXAMINATION

Matter 3 – Housing Need and Provision

The HBF would like to submit the following further comments in respect of Matter 3b. Please note the HBF intend to submit a statement in relation to Matter 3a, this will be submitted in accordance with the revised deadline of 19th November 2015.

Issue 3b: Whether the evidence of housing capacity and delivery is sufficiently robust to give confidence that the development of a minimum 11,070 new homes will be achieved by 2030.

3.9 Is the capacity of sites identified in the Strategic Housing Land Availability Assessment (SHLAA) based on a thorough testing of each site's suitability, availability and achievability? Is there compelling evidence that the assessed yield from certain sites is unlikely to be delivered (or may be exceeded)?

The HBF has no further comments at this stage.

3.10 Are the site assumptions and discounts applied to the identified supply in the SHLAA realistic? Is the SHLAA's assertion of compelling evidence to justify the windfall allowance based on a sound analysis of windfalls?

The HBF has not undertaken a detailed analysis of the sites within the SHLAA but makes the following general comments.

The SHLAA (ref: HO6) identifies net density assumptions of between 30 and 40dph (paragraph 3.19). The HBF agrees that densities should be amended to take account of site characteristics and their wider setting. The recently published Land Use Change Statistics identify that nationally densities are, on average, 32dph (net) across all sites including high density town / city centre schemes. On previously developed land the average density was 37dph and on greenfield land the average density was 26dph. The Council's assumptions, whilst falling within the range are therefore considered slightly too high. The HBF generally recommends that densities for individual sites, particularly larger sites, are discussed with the developer / promoter. Where this has not been possible it is recommended that the national averages be used unless there are specific issues which would limit density upon a site, such as the need for infrastructure provision.

The third bullet at paragraph 3.19 identifies net developable area. The HBF agrees the net developable area will vary with larger sites tending to have a lower ratio, due to the need to take account of infrastructure and other facility requirements. Rather than

using a percentage ratio for larger sites the HBF recommend that additional work is undertaken which considers site characteristics and known infrastructure requirements.

The assumptions made within the SHLAA should be closely monitored on a site by site basis, to ensure sufficient allocations are provided to meet the housing requirement. In this regard the HBF advocates a buffer of sites to ensure any under-delivery against the generic assumptions are accounted for.

Section 4 of the SHLAA discusses the issue of windfalls. The information presented clearly demonstrates that windfalls have provided a significant source of supply within Sefton over a number of years. It would appear likely that windfalls will continue to provide a level of supply in the future. The previous level of windfalls must, however, be considered in the context of an aging plan and a lack of allocations. Going forward with plan-led allocations the amount of windfalls is likely to decrease. The HBF therefore supports the Council in not utilising the average rate of windfalls over the assessed period (2008/9 to 2014/15). The HBF also supports the discounting of windfalls from year 1 and 2 of the assessment (paragraph 4.13) to avoid double counting and the discounting of certain areas due to the lack of windfall delivery in the past (paragraph 4.13, final bullet).

The SHLAA concludes that a windfall allowance of 1,071 should be made over the plan period. This is equivalent to approximately 10% of the overall proposed housing requirement. Whilst the HBF recognise that windfalls have consistently become available, and the Council can point towards potential future sources of windfall delivery, we remain concerned that an over-reliance upon windfall delivery could jeopardise overall housing delivery. This is because the Council has failed to deliver against its housing target for a number of years and accrued a significant backlog, therefore any over-reliance upon windfall delivery could exacerbate this position. The HBF therefore advocate a cautious approach and as such suggest a lower windfall allowance be considered, possibly 5% of the overall housing target. This would provide greater flexibility within the plan, if the Council's assumptions are correct, enabling it to deal with changing circumstances in the future, or a lack of delivery from allocations.

3.11 Is the variation in the annual delivery of dwellings in policy MN1 (500 dwellings pa to 2017 and 660 pa thereafter) justified?

No, the HBF does not consider that a stepped approach to housing delivery is justified. The *Housing Technical Paper* (ref: TP1) Appendix 1 provides the Council's reasoning behind this approach. This is essentially that many of the sites are large sites currently within the Green Belt which will take time to assemble and bring forward and the early years of the plan have been characterised by high levels of demolitions. Whilst the HBF acknowledges that demolitions will undoubtedly impact upon delivery it should be recognised that over the first five years they account for less than 17% of an average housing requirement. The HBF do not consider this so significant that the plan requirement should be reduced.

The HBF also agrees that there will be a lead in time for large sites. However, the Council is promoting a wide range of sites through the plan which will assist in meeting the requirement within the earlier years. The fact that there are several larger sites is not considered adequate justification to discount delivery early in the plan period. It is also notable that the SHLAA (ref: HO6, table at page 29) identifies a deliverable supply of 3,947 over the next five years, equivalent to 789dpa. Even taking account of the under-delivery in the first three years a delivery requirement of at least 550dpa appears

achievable, once the plan and allocations are in place this may increase due to latent demand within the area.

Year	Net delivery
2012/13	405
2013/14	313
2014/15	454
2015/16	789
2016/17	789
Average	550

Note: figures 2012/13 to 2014/15 taken from graph at para 3.14, TP1; 2015/16 and 2016/17 averaged from HO6.

Furthermore the stepped requirement is contrary to the evidence upon need. The 2012 sub-national household projections (2012 SNHP) identifies a baseline demographic starting point averaging 576 dwellings per annum (dpa) over the full plan period (2012 to 2030). However, if this requirement is broken down into the two periods identified within Policy MN1, 2012 to 2017 and 2017 to 2030 the 2012 SNHP identify a baseline starting point of 597dpa in the period 2012 to 2017 and 568dpa between 2017 and 2030. Therefore the housing requirement would not meet the needs within this early period.

Due to the reasons above the HBF does not support a stepped housing requirement and recommends a flat housing requirement.

3.12 The SHLAA refers to the publication of a separate document setting out the assessment of the 5 year supply of deliverable housing sites, as required by NPPF paragraph 47. Does this document satisfy national policy? Should a 20% buffer for persistent under-delivery be applied and, if so, how should this be calculated?

At the time of writing the publication of the most recent assessment of the Council's five year supply position was still awaited. The HBF will reserve our position upon this issue until we have had the opportunity to fully consider this impending document.

It is, however, clear that a 20% buffer should be applied due to persistent under-delivery in accordance with NPPF paragraph 47. The *Housing Technical Paper* (TP1) and *July 2015 Review of the Objectively Assessed Housing Requirement* (HO1) both clearly demonstrate (page 9 and Table 6.4 respectively) that the Council has only met its housing requirement once in the last 10 years and has accrued a backlog against this target of 1,245 dwellings.

3.13 Should the Plan include a phasing policy which requires brownfield land to be developed before Green Belt allocations? Would this be consistent with the provision of a 5 year supply of housing sites?

The HBF does not consider the phased release of sites to be consistent with the NPPF. The Council has already identified that the proposed allocations are sustainable and therefore their development should not be artificially constrained. The NPPF indicates that development that is sustainable should 'go ahead without delay' (ministerial foreword, paragraphs 14 and 15).

To ensure the Council can begin to deliver against its housing targets it is important that it has a wide portfolio of sites which can be delivered by the market in current conditions. This is particularly important given that the Council is unlikely to be able to

demonstrate a five year supply without the Green Belt allocations. The Council may wish to identify likely timescales for delivery through a trajectory but should not seek to stall sustainable and deliverable sites from coming forward, this will simply thwart development and will create difficulties for the Council in achieving its 5 year supply of housing.

The HBF points towards the examinations of the South Worcestershire Local Plan and Rotherham Core Strategy where phasing was noted as not being consistent with the NPPF and recommended for removal in both instances.

The phasing of brownfield sites prior to the Green Belt allocations would effectively be a prioritisation of such land. The Government, through the NPPF, moved away from this approach due to the failings of the past to one of encouragement (paragraph 111). The Government is seeking to provide encouragement through the introduction of a brownfield register and local development orders for brownfield land.

3.14 Should the Plan include a housing trajectory which illustrates the expected rate of housing delivery over the plan period, as sought by NPPF paragraph 47? Should there be a contingency in place in case the trajectory is not delivered, and if so, what should this be?

Yes, the HBF consider that an indicative trajectory for housing delivery over the plan period should be included. This is in conformity with NPPF paragraph 47 and also assists clarity. It is also considered that a contingency should be included in case the trajectory is not delivered. This contingency could include an early review clause, in addition to that discussed previously, if the trajectory was not being met. Alternatively, the plan could identify contingency sites which could be brought forward, subject to criteria, if it became apparent that the trajectory would not be met.

3.15 Should the Plan address the demand for self or custom build homes?

The HBF has no further comments at this stage.

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