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Dear Sir / Madam

Rotherham Sites and Policies Examination: Housing Land Supply (RMBC 029) and Five Year Housing Land Supply (RMBC 030)

Thank you for consulting the Home Builders Federation (HBF) on the Housing Land Supply (examination ref: RMBC 029) and Five Year Housing Land Supply (RMBC 030) documents. These documents were produced in accordance with the Inspectors Note 1: 29 July 2016, (Examination ref: ID014).

Our comments upon each document are set out separately below. **The HBF would like to attend any further hearing sessions in relation to these matters.**

Housing Land Supply (RMBC 029)

Current Position and Target

The HBF agrees with the statements on page 5 of the consultation document that the Core Strategy housing requirement is 958dpa, spread evenly over the plan period¹, and that the remaining housing requirement, net of completions since 2013, is 12,601 dwellings.

Windfalls

The HBF agrees with the statement on page 7 of the consultation document that due to their unpredictable nature windfalls should not be counted as part of the supply but as flexibility only. This is more important as the Council moves towards the adoption of the Sites and Policies document. The allocations provided by this document are likely to form the vast bulk of the supply going forward. This differs substantially from the recent past where a significant proportion of the supply had to be provided by windfalls due to the aging nature of the plan and lack of viable allocations.

¹ This is made up of the base target (850dpa) plus the backlog from 2008 to 2013 spread over the plan period (108dpa).

The HBF considers that the 70% discount on permissions from smaller sites (less than 10 units) is reasonable and should be applied.

Safeguarded Land

It is agreed that safeguarded land should not be included in the supply as this will require a plan review to release such sites for development. The Council may, however, wish to consider whether some of the safeguarded land sites should be re-designated as reserve sites to be released if the plan is failing to meet its housing trajectory or identify a five year housing land supply.

Former UDP Allocations

The inclusion of former UDP allocations is a point of contention. Given the time elapsed since the adoption of the UDP in 1999 it is questionable whether any sites from this source UDP, which are not yet under construction, will deliver during the plan period. These sites have failed to deliver in the last 17 years, if included the Council will need to identify why it considers that the deliverability of these sites is likely to change in the foreseeable future.

The HBF understands that just three sites are included from this source. These are; RDF0018, RDF1184 and RDF1361. These sites have a remaining potential for 115 units, of which 100 are identified as currently under construction. This leaves just 15 units on site RDF1361 which is identified as a 'Preferred Allocation'. It is understood from appendix 1 of the consultation document these 15 units are not anticipated to be delivered during the plan period.

Delivery Rates

It is understood that in the main the delivery rates applied are those included and agreed within the SHLAA. These rates are, however, a '*rule of thumb*' and should not be applied strictly where there is credible contrary evidence from the landowner / developer or their agents. It is understood that in terms of the strategic sites at Bassingthorpe Farm (RDF1872) and Waverley (RDF0350) the relevant agents consider the Council's delivery rates to be overly optimistic. It is therefore recommended that these are revised to take account of this information.

Total Supply

The total supply is anticipated to provide an additional 629 dwellings over the plan period. This provides a buffer of approximately 5% over the remaining requirement. This provides little flexibility should any sites fail to deliver as anticipated by the Council.

The situation does improve if a windfall allowance of 100dpa is included. This would provide an additional 900 dwellings, based upon a contribution from year 4 onwards to avoid double counting with existing commitments. The total buffer in this case would be 1,529 dwellings, approximately 12% over the remaining requirement. This is, however, placing significant reliance upon an uncertain element of supply which is likely to diminish once adopted allocations are in place. Within our matter 5 hearing statement we make reference to the need to provide a 20% buffer, this is still considered appropriate.

Other Flexibility

This generally relates to safeguarded land. Whilst this source of supply may provide development potential in the long-term it will not assist the current plan as it can only be released upon plan review. It cannot therefore be considered as providing flexibility for this plan. The HBF refer to our comments above concerning the potential re-designation of safeguarded land to provide flexibility.

Five Year Housing Land Supply (RMBC030)

The paper identifies a number of options for calculating the Council's five year land supply. All of the options provide a 20% buffer in compliance with NPPF, paragraph 47. The HBF agrees that this is the correct buffer.

The Council's preference is option 1 which simply provides for the Core Strategy housing requirement of 958dpa over five years, plus a 20% buffer. This option would deal with any newly arising under-delivery since 2013 later in the plan period. This method is flawed as it delays dealing with any unmet needs over the current plan period until an unspecified point. The result is that this unmet need either will not be delivered or it will not be met for a significant period of time. The HBF does not consider this a positive approach to dealing with the unmet needs of the area and is clearly contrary to the NPPF requirement to significantly boost housing supply.

Option 2 and Option 3 consider dealing with the under-delivery over the remaining 12 years of the plan (Liverpool method) and within the first five years (Sedgefield) respectively. These options are then split into (a) and (b) which consider the under-delivery over the plan period against the 'baseline figure' of 850dpa and against the full requirement of 958dpa. The HBF consider options 2(a) and 3(a) to be flawed as the under-delivery is solely based upon the 850dpa baseline figure. The Core Strategy housing requirement is made up of two components, the baseline figure (850dpa) plus the backlog between 2008 and 2013 (108dpa), combined these provide a housing

requirement of 958dpa. The Core Strategy Inspector was clear on this point (paragraph 63). Seeking to apply the under-delivery against the baseline requirement would, therefore, not be in conformity with the Core Strategy.

Options 2(b) and 3(b) measure the under-delivery against the full Core Strategy requirement of 958dpa. This is considered to be appropriate. The HBF supports option 3(b), this most closely conforms to the NPPF requirements to plan positively and boost significantly housing supply, as well as the guidance within paragraph 3-035 of the PPG. Option 2(b) would simply put off meeting needs, required now, until much later. This will have consequences for the overall delivery of plan and meeting the housing requirement in full.

Only option 1, including the use of Green Belt sites, would provide the Council with a five year supply upon adoption. This options is, however, clearly flawed as discussed above. It is therefore clear that to ensure that the plan is sound and remains up to date upon adoption additional sites will be required to bolster the five year supply.

The following table identifies the additional requirements for each of the options, inclusive of the Green Belt sites, plus the additional outlets (which may be multiple on larger sites) required to ensure a five year supply is provided.

Meeting the five year housing land supply

Option	Additional capacity required*	Annual increase required	Additional outlets required**
1	0	0	0
2a	281	56	2
2b	443	89	3
3a	827	165	5
3b	1,216	243	7

*Based upon Council Supply figures; ** Using SHLAA assumption of 35dpa per outlet.

Whilst it is recognised this is a relatively crude calculation it serves to illustrate that the delivery implications identified by the Council after each option are not insurmountable. Success is simply dependent upon the Council providing sufficient attractive deliverable sites.

Yours sincerely,



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