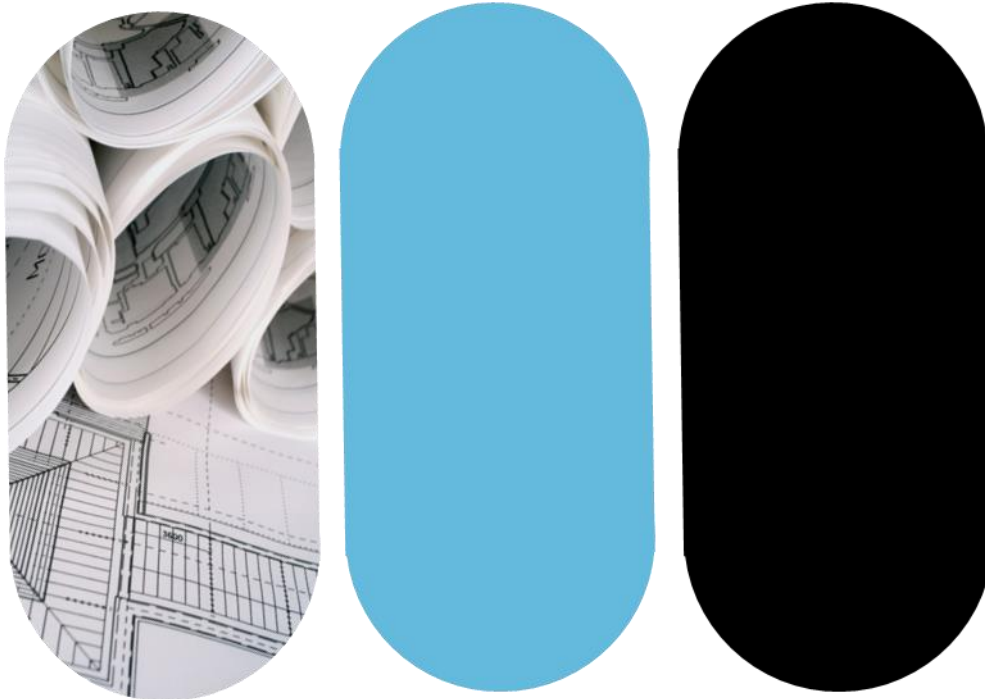




MATTER 5 HEARING STATEMENT THE HOUSING REQUIREMENT/OVERALL HOUSING PROVISION

On behalf of William Davis Homes



Waterfront House, Waterfront Plaza, 35 Station Street, Nottingham, NG2 3DQ
www.marron.co.uk

ISSUE 1 – Whether the Core Strategy Review has been positively prepared and whether it is justified, effective and consistent with national policy in relation to the housing requirement and overall housing provision.

Question 2: In response to the Inspector’s Initial Questions, the Council concluded there are no circumstances that justify a higher housing figure. Is this conclusion reasonable and supported by the evidence?

1. The Council has provided a clear indication within its response to the Inspector’s Initial Questions that during the course of the Core Strategy Review’s (CSR) preparation, it has relied the Borough’s Local Housing Need (LHN) figure calculated using the Standard Method. As stated by the Council, this is because “no alternatives to the use of the Standard Method were suggested or recommended by respondents to the consultation.” The LHN has therefore been used as a proxy for the CSR’s housing requirement despite the fact that, as set out in the Planning Practice Guidance (PPG), *“the standard method...identifies a minimum annual housing need figure. It does not produce a housing requirement figure.”* Furthermore, the PPG states that *“assessing housing need is the first step in the process of deciding how many homes need to be planned for. It should be undertaken separately from...establishing a housing requirement figure.”*
2. Despite this advice, the Council has set out in its response to the Inspector’s Initial Questions that it has not “explicitly assessed” planning for a higher number of homes than the LHN, but is nonetheless of the view that there are “no realistic circumstances” where housing need may be higher than the output from the Standard Method. With all respect to the Council, it is not clear how this conclusion can be drawn so confidently when the matter of the housing requirement has not been “explicitly” assessed. We do not see how it could have been implicitly assessed, as assessing the matter fully relies on evidence which has not been consulted upon. The Council has, in its response, cited the absence of “strategic scale infrastructure” underpinning greater housing growth but this is only one of the non-exhaustive list of circumstances provided for within the PPG when it may be appropriate to plan for a housing requirement greater than the LHN. The Council has, for example, dismissed out of hand the need for a greater housing requirement to underpin above-trend economic growth, despite the need to achieve an integrated response to both and a clear indication from the Nottingham Core HMA and Nottingham Outer HMA Employment Land Needs Study that the Council and its neighbours will need to plan for a greater number of homes in order to facilitate the in migration of working age people into the area.
3. Entirely separate from those considerations and as discussed in our Regulation 19 representations, an uplift to the housing requirement is also necessary to meet

affordable housing needs which are very considerable after years of under-delivery and accommodating unmet needs from neighbouring areas, which there is no effective mechanism within the CSR to address. Those factors may indicate a higher unconstrained assessment of housing need, but this is a separate exercise from determining whether such needs should be met through the release of Green Belt land.

4. For the above reasons, the assertion that there are no circumstances that justify a higher housing requirement figure than that suggested by the Standard Method is not reasonable or supported by the evidence.

Question 3: The Core Strategy Review identifies a minimum housing requirement of 5,800 net dwellings over the period 2022 to 2037. Is this justified? If not, what should the housing requirement be?

5. Given the successive delays encountered during its preparation, the end date of the CSR should have been extended. The CSR will now not be adopted before 2024 and hence will only look ahead 13 years from adoption as opposed to the minimum 15 year period set out at paragraph 22 of the National Planning Policy Framework. As a result, the CSR should run to 2039 at least. In addition, preparation of the CSR began in 2020 which is the base date for the other Greater Nottingham plans. Selecting 2022 as the base year for the CSR is therefore questionable. Accordingly, if the plan period was appropriately selected, the CSR would have a housing requirement of 7,334 as opposed to 5,800 before considering any uplift to the housing requirement to take account of the factors mentioned above in our response to Question 2.
6. There are myriad factors to consider within the course of plan preparation as to whether the housing requirement should be set higher than that suggested by the LHN. Affordable housing delivery, above-trend economic growth levels, unmet need from neighbouring areas are just some of the relevant factors which should have been considered in formulating the housing requirement which have not been, and should have a material bearing on the overall level of housing provision within the CSR.
7. At the very least, readers of the CSR should be able to infer why the particular level of housing provision was selected when considered against the reasonable alternatives. Understanding and testing the level of housing provision needed as part of the CSR process would have required a clear yet proportionate evidence base in respect of the housing requirement that applies the approach of the PPG. That approach as well as the relevant evidence absent here so it is not possible to say what the housing requirement should be, only that the one presented has not been informed by sufficient and proportionate evidence nor the proper application of national planning policy.

Question 4: Will the proposed supply of dwellings set out in Strategic Policy 1 incorporate a sufficient “buffer” to allow for non-delivery as well as providing choice and flexibility in the supply of housing land?

8. Without sufficient choice and flexibility in supply, the Council is in danger of repeating history in respect of embedding the chronic under-delivery of homes within the CSR through the reliance on a small number of large-scale sites and urban windfalls, which are an inherently uncertain source of supply. The CSR's housing requirement is 5,800. The CSR's overall provision of homes is 5,800, just slightly under half of which number is expect to come forward as urban windfall with a further substantial number to come forward on a complicated, large-scale brownfield site that is very likely to be undeliverable in the plan period.
9. Due to the uncertainties inherent in predicting the speed, rate and capacity of windfall sites coming forward, particularly those in urban areas, as well as the significant programme of Green Belt release, mindful of the National Planning Policy Framework's advice that amendments to the Green Belt should be capable of enduring beyond the plan period, it is not hard to see why a housing supply contingency would be necessary to render the plan positively prepared and able to respond to changing circumstances. Even an approach which had identified reserve sites and safeguarded land released from the Green Belt to come forward within subsequent reviews would have responded to the uncertainties set out above, as well as the wider issues of unmet need within HMA.
10. For those reasons, we do not consider that the CSR incorporates an appropriate buffer to account for non-delivery noting the very high risks of this occurring having regard to the components of supply. There is also insufficient flexibility to address housing needs likely to arise from the Nottingham HMA and to ensure that further alterations to the Green Belt boundary will not be necessary in the near future.

Question 6: In overall terms is the approach to the housing requirement justified?

11. No. The housing requirement has been adopted on a straightforward assessment of the Borough's Local Housing Need (LHN) calculated using the Standard Methodology. As set out by the Planning Practice Guidance, the LHN is a minimum starting point and does not produce a housing requirement. The housing requirement should take account of such factors as the requirement to ensure an adequate level of affordable housing across the plan period, economic growth, specialist housing needs as well as unmet needs from other areas. These factors have been ignored in the formulation of the housing requirement rendering it unsound.

12. In addition to the above, the housing requirement has been calculated on the basis of an inappropriate plan period which will not look ahead 15 years from adoption contrary to the requirements of the NPPF. The base year of the CSR is also problematic given that the preparation of the CSR commenced in 2020 rather than 2022. Finally, the housing requirement and the overall level of housing provision has not appropriated sufficient buffers to allow for non-delivery and places in general too high reliance on the delivery of complicated urban and brownfield sites which have historically not come forward at a sufficient pace to support ongoing housing needs.

Word Count: 1,516