



Gladman Developments Ltd

Derbyshire Dales Local Plan Examination

Matter 4 How will the Housing Requirement be met and a Five Year Housing Land Supply Maintained?

1. The extent of flexibility built into housing supply

Is there sufficient flexibility built into the housing supply such that the housing requirement is likely to be met?

1. Gladman have raised concerns that there is insufficient flexibility in the housing land supply to ensure that a five year housing land supply can be maintained over the plan period to meet the minimum housing requirement of 6440 (taking into account existing commitments and proposed allocations).
2. The Council's expected supply is just 130 dwellings (2%) above the housing requirement, which demonstrates that the Plan is currently proposing an overly vulnerable strategy, with little margin for error should there be even just a minor change in circumstances from the predictions made in the housing trajectory (see response to question 2 below). A number of strategic sites are proposed within the Derbyshire Dales Local Plan, which will require significant policy requirements to be fulfilled and initial site and infrastructure works to be implemented prior to commencement. It is therefore necessary to ensure that these proposals are supplemented by a sufficient number of additional allocations to provide the necessary certainty that housing requirements will be met in full. Furthermore, the local plan sets out a minimum requirement which would not represent a cap on sustainable development from coming forward.

3. Gladman would propose that mechanisms are put in place within the Local Plan to provide greater certainty that the Local Plan target can be met and that a rolling five year housing supply can be maintained, this should include:

- The allocation of additional sites adjacent to sustainable settlements
- Suitable policy wording to establish how the local planning authority will respond in circumstances where it is identified that the ability to meet the overall housing requirement and maintain a rolling five year housing land supply over the plan period has altered from that which is initially expected.

2. The Housing Trajectory

Is the housing trajectory set out in the Strategic Housing and Economic Land Availability Assessment (SHELAA) and at Appendix 3 of the LP realistic taking into account past completion rates? Are build rates of 30 dwellings per annum (dpa) from larger sites realistic and supported by evidence?

4. The housing trajectory sets ambitious predictions for the delivery of new housing when considered against past completion rates. Suitable caution is required when making assumptions on delivery rates within the trajectory, which must be based on suitably robust evidence.

Is there any updated information on commitments and completions to inform the examination?

5. Gladman note this question and will consider any information submitted by the Council in relation to its housing trajectory and housing land supply prior to the Matter 4 hearing.

3. Delivery from commitments and allocations

Is the delivery of some 74% of commitments and 36% of allocations within the first 5 years of the LP realistic?

6. All assumptions on lead in times and delivery rates should be based on robust evidence, providing the necessary information to justify the figures contained in the 5 year housing land supply.

7. Any delivery assumptions applied to the Council's larger strategic sites must be clearly justified and any risks to delivery highlighted. Progress will then need to be closely monitored to ensure that these sites are delivered at the expected rate and timescales identified. An overreliance on such sites would represent an unnecessary risk to delivery of the housing requirement and without suitable contingency would result in the continuation of housing land supply issues in Derbyshire Dales.

4. Constraints to delivery in general terms

are the strategic housing allocations deliverable having regard to the infrastructure requirements and constraints affecting them?

8. The strategic housing allocations have the ability to be brought forward for development during the plan period. It is however notable that the Local Plan relies heavily on large scale major strategic sites, which will introduce significant delivery challenges and in some cases the development of the site could reasonably be considered to be aspirational rather than deliverable. Such large scale sites will require major infrastructure works to be undertaken and have a number of constraints such as flooding, transport and contaminated land that will need to be addressed (the latter being particularly pertinent where former industrial land is proposed to be brought back into use). These constraints can have a major impact on delivery and create uncertainties in terms of viability. In the context of deliverability there

is, as a result, concern that a 5 year supply of housing land (as required by paragraph 47 of the NPPF) cannot be demonstrated and that it is unlikely these sites will be delivered at the level that is anticipated over the plan period. Greater choice and flexibility is therefore required in terms of size and location of housing sites to provide sufficient certainty that the housing requirement will 'at least' be met.

What are the implications for meeting the housing requirement if one or more of the strategic housing allocations do not come forward?

9. There would be significant implications should one or more of the strategic sites not come forward (or not come forward at the rates anticipated). Fundamentally, any failure to deliver housing in the manner anticipated would result in a situation where the Council would be unable to maintain a five year supply of housing land or meet its housing requirement in full over the plan period.
10. Gladman are of the view that further sites should be identified through allocation within the Local Plan in order to ensure that any delays in the delivery of housing from strategic sites can be managed effectively without triggering the need for a lengthy local plan review.

5. Housing implementation strategy

Are the provisions of Chapter 9 of the LP (Implementation and Monitoring) sufficient to meet the requirement for a Housing Implementation Strategy?

11. Gladman are concerned that the provisions set out in Chapter 9 (Implementation and Monitoring) are insufficiently detailed and does not represent an approach that gives certainty that a positive response should it become apparent through monitoring that a five year housing land supply will not be maintained.

6. The wording of housing supply policies

How is Policy HC1 (and any other relevant policies) to be modified to respond to a shortfall in the five year housing land supply?

12. Gladman note from the Council's response to the Inspector's Preliminary Questions, Clarification and Comments Relating to Soundness (Healthy and Sustainable Communities – Chapter 6), that prior to the commencement of the hearing sessions, a modification to Policy HC1 will be prepared. Where appropriate, Gladman will comment on this proposed modification at the relevant hearing and comment further during any associated consultation period relating to proposed main modifications if necessary.

13. In order to ensure that any shortfall in housing land supply that is observed over the plan period is addressed as expeditiously as possible, suitable mechanisms should be built into the Local Plan:
 - The first is to introduce further land through the allocation of additional small and medium sized sites (in the range of 0-200 dwellings) through Policies S6 and HC2. Gladman are of the view that a contingency of 20% should be built into the Plan to provide greater certainty from the outset that the Local Plan will enable the area to at least meet its housing requirement. This approach will also support the Local Plan in achieving the aspirations of the Government's recent Housing White Paper that seek to support small and medium sized house builders in re-establishing themselves as major contributors to the delivery of the housing. Paragraph A55 of the White Paper indicates that the Government aspire to "promote a good mix of sites and increase the supply of land available to small and medium-sized housebuilders – something that will help to diversify the housebuilding sector and encourage more competition".

- The second is to introduce suitably flexible policy wording to ensure that sustainable development opportunities can be considered favourably should it be evident through monitoring that the Council's five year housing land supply is vulnerable.

14. Gladman believe that the following modification would ensure that a suitably positive policy approach is put in place for Derbyshire Dales that will enable the level of housing required to meet the Local Plan requirement, including the consideration of sustainable housing proposals outside settlement development boundaries in locations that are well related to the settlement hierarchy:

POLICY HC1: Location of Housing Development

The District Council will ensure provision is made ~~for~~ **to significantly boost the supply of** housing, taking into account all other policies in this Local Plan by:

- Supporting the development of specific sites through ~~new~~ site allocations in the Local ~~or a Neighbourhood Plan~~ **to provide an initial contingency of 20% above the Local Plan requirement.**
- **Supporting the allocation of new housing sites within Neighbourhood Plans**
- Promoting the effective reuse of land by encouraging housing development including redevelopment, infill conservation of existing dwellings and the change of use of existing building to housing, on all sites suitable for that purpose.
- Supporting housing development on unallocated sites in accordance with the defined Settlement Hierarchy.
- Encouraging the inclusion of housing in mixed use schemes where housing can be accommodated in an acceptable manner without compromising other planning objectives.
- Supporting development identified through a Community Right to Build Order.
- Supporting self-build housing schemes where there is an identified need.
- Supporting development promoted through a community land trust.

The Council will monitor actual and forecast provision through the Monitoring Report and its housing trajectory to ensure ~~that there is~~ a five year supply of deliverable housing sites against the housing requirement of the Local Plan is maintained. **If at any point in the**

Local Plan period, the Council's monitoring shows that housing land supply falls below 5.25 years, housing proposals on sites that are well related to the development limits of settlements will be supported where these proposals represent sustainable development and are consistent with relevant policies of the Plan. If necessary, the District Council will review the Local Plan to bring forward additional sites for housing.