



Acres Land & Planning Ltd

'Acres of space'

Client: The Goodall Family
Matter 4 Housing Supply

FURTHER SUBMISSION ON MATTER 4: MEETING THE HOUSING REQUIREMENT & 5 YEAR HOUSING SUPPLY.

DERBYSHIRE DALES LOCAL PLAN: EXAMINATION IN PUBLIC

Introduction.

Acres Land & Planning Ltd (ALPS) have submitted representations on behalf of the Goodall nFamily in support of their land at Brailsford which is proposed for future housing development. This further submission summarises the key points raised by ALPS in our cases and addresses the points raised by the inspector in his Question & Answer paper.

Issues.

Issue 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?

No. Whilst the Council has been careful, following their experience from the previous withdrawn Local Plan, to provide for the full amount of the Objectively Assessed Housing Need – albeit with no allowance for any other authority through the Duty to Co-operate - we consider that the scale of deliverable housing supply is dangerously tight.

This is the case for three main reasons:-

Firstly, the Council has only provided marginally more plots than are needed to meet its target meaning that virtually all the sites would need to be delivered at full capacity and on time to achieve their target – with few if any lapsed permissions. This is unrealistic and runs counter to the Government's emphasis on delivery within the White Paper.

Secondly, the nature and landscape of the District means that where there are dispersed sub-markets with many remote settlements each with their own housing needs, there needs to be more flexibility than where all parts of the area are easily accessible to everyone – such as within a town or city, and

Thirdly, the type of site which has been provided in the draft housing allocations is not conducive to quick delivery or rapid sales. The delivery of the large quarry sites will be a major challenge, both from the infrastructure, viability and the marketing viewpoints. The Council will therefore need to demonstrate a realistic rate of delivery and clear evidence of

availability before the Local Plan can be found genuinely sound. Similarly, large sites such as the Ashbourne Airfield will need to include cautious delivery assumptions to allow for the natural reluctance of buyers to purchase houses on remote and exposed housing sites outside the town. Until there is a critical mass and an attractive range of local services at Ashbourne Airfield, one must anticipate that the sales rate will be very slow.

The Government's recently published Housing White Paper indicates a clear shift in policy whereby firstly, a much greater emphasis is given to **meeting housing needs** and in particular the commitment to 1 million new homes by 2020. (The Prime Minister's Foreword to the document makes it abundantly clear that we are not building enough homes, we are not building them quickly enough and we do not have sufficient diversity in our housing market) and secondly, both local authorities and developers need to give much greater emphasis on achieving **delivery of housing**. It is not enough to simply allocate sites and expect them to be developed. There is also a strong steer towards allocating smaller sites which can come forward quickly and are more suited to local building firms.

My client's site in Brailsford fits all these criteria admirably. It is a small site which is well suited to local demand, it is ideal for a local builder and it can be delivered relatively quickly whilst delivering a high quality of layout and design and yielding positive contributions to the local community.

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

The trajectory within Appendix 3 of the Local Plan would appear to have been conceived in order to boost the Council's 5 year housing land supply position rather than to anticipate or indeed plan for the delivery of housing in the future. The expectation that completions will rocket from 117 in 2013/4, 123 in 2014/5 and 162 in 2015/6, to 811 dwellings in 2018/9, is almost inconceivable. The housing allocations will not all emerge together. Larger sites (especially those with major infrastructure requirements) will take much longer to commence and will be slower to develop. It would be logical therefore for the Council to amend the trajectory to represent a more realistic outcome.

In strong market conditions in a well-located site, build rates of 30-35 dwellings per annum are readily achievable, but the more awkward the site and the more remote the location (and therefore the more limited the market) the slower the delivery will be. Builders can only build homes at the rate they can sell (or rent) them, lest they over-expose their company to financial risks. It is in no-one's interest, least of all the existing home-buyers, to have completed houses standing empty for too long.

We have yet to see the Council's evidence on the delivery of the key strategic sites and the assumption behind the build rates. We anticipate that this information will be available on 12th April 2017 and we reserve the right therefore to comment on this report during the EIP. We also look forward to seeing updated information on commitments and completions.

Issue 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?

We have already indicated above that the anticipated delivery figures within the trajectory are hopelessly unrealistic. They clearly represent what could theoretically be available, rather than what realistically will be available, or what will be built. As such this is unhelpful to business and industrial companies which might in future want to use the Local Plan to forecast the availability of labour.

Issue 4. Constraints to delivery.

In general terms are the strategic housing allocations deliverable having regard to the infrastructure requirements and constraints affecting them? What are the implications for meeting the housing requirement if one or more of the strategic housing allocations do not come forward?

We await the Council's schedule for the delivery of the large strategic sites which has been promised. This is likely to be critical in terms of the soundness of the Plan, including whether the Local Plan genuinely boosts housing supply (as required by paragraph 47 of the NPPF) and has been positively prepared.

If strategic sites fail to come forward the practical implications are likely to be many and varied:-

Firstly, it will undermine the Dales economy, since housing is critical to support business and industry,

Secondly, it will result in hardship amongst both the local community and those seeking to move to Derbyshire Dales, with resultant higher prices and reduced affordability,

Thirdly, it will lead to greater uncertainty with the likelihood that the Council will lose its 5 year housing land supply and hence be more vulnerable to planning by appeal. There will also be a need for remedial measures to bring forward other sites to replace those lost or delayed.

It is important therefore to ensure that sites which have been allocated do genuinely come forward.

Issue 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?

Not really. The schedule in chapter 9 is very generalised and only provides broad indications of who will be involved in monitoring and delivering policies, not when. There needs to be a clear Housing Implementation Strategy to secure the Government's objectives in achieving delivery of homes with clear timescales and a trigger for review as a fall-back position.

I will participate further on this aspect at the EIP.

Issue 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?

We have offered qualified support for this policy insofar as (unlike many other policies in the Plan) it appears to be positively written and supports various forms of housing development.

It also provides for monitoring against the 5 year housing land supply, something which the authority needs to provide on a continuous basis.

Our formal representations on the policy however sought a strengthening and clarification of the policy so that there was a clearer trigger for a Local Plan review (or site allocation DPD) in the event that delivery falls behind. The final sentence of the policy therefore needs to provide a clear indication of the relevant circumstances whereby the Local Plan should be reviewed. This will be essential if the Council is not to find itself facing a serious shortfall. The policy should indicate how and when further sites will be needed.

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Acres Land & Planning Ltd

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