

Rushcliffe Borough Council
Rushcliffe Arena
Rugby Road
West Bridgford
Nottingham
NG2 7YG

SENT BY E-MAIL AND POST

31 March 2017

Dear Sir / Madam

RUSHCLIFFE LOCAL PLAN PART 2 – FURTHER OPTIONS CONSULTATION

Introduction

Thank you for consulting with the Home Builders Federation (HBF) on the above mentioned consultation. The HBF is the principal representative body of the house-building industry in England and Wales. Our representations reflect the views of our membership, which includes multi-national PLC's, regional developers and small, local builders. In any one year, our members account for over 80% of all new "for sale" market housing built in England and Wales as well as a large proportion of newly built affordable housing. We submit the following responses to specific questions set out in the above mentioned consultation document.

Question 1

The Local Plan Part 2 will set out the non-strategic site allocations and detailed policies for the management of new development in accordance with the strategic framework of the Rushcliffe Local Plan Part 1 adopted in December 2014. Policy 2 of the adopted Local Plan Part 1 proposes a minimum of 13,150 dwellings in Rushcliffe between 2011 – 2028.

It is noted that the Council has identified a delay in housing delivery from all but one of the six allocated strategic sites which has resulted in a shortfall in housing supply and the likelihood of not maintaining 5 YHLS throughout the plan period. The Council's 5 YHLS calculation set out in Appendix A is based upon the HBF's preference for a 20% buffer applied to both the annualised housing requirement and shortfall together with a Sedgefield approach to shortfalls. The HBF concur that this calculation identifies a deficit of circa 900 dwellings. However in its 5 YHLS calculation the Council is not applying a lapse rate. Such an approach is only appropriate if the Council's assumptions on the housing delivery rates of individual sites included in the trajectory together with windfall allowances are realistic and there is sufficient contingency within the overall HLS. Otherwise as set out in the Local Plans Expert Group (LPEG) Report on 5 YHLS calculations (Appendix 13) a 10% lapse rate should be applied.

It is agreed that any deficit of 900 or more dwellings should be corrected in the Local Plan Part 2 and additional housing site allocations are required. However the HBF suggests that the Council should be allocating housing sites for at least 2,000 dwellings as identified by the Council plus a contingency to the overall HLS. The HBF would recommend as large a contingency as possible especially given the Council's past experience of difficulties with HLS due to the delayed start of strategic sites and the housing requirement is a minimum not a maximum figure. The HBF always suggests a 20% contingency to provide sufficient flexibility for unforeseen circumstances. Indeed the Department of Communities & Local Government (DCLG) presentation slide from the HBF Planning Conference in September 2015 illustrated a 10 – 20% non-implementation gap together with a 15 – 20% lapse rate. The slide emphasised “*the need to plan for permissions on more units than the housing start / completions ambition*”.

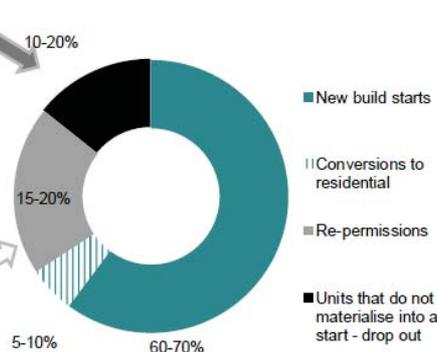


Department for
Communities and
Local Government

In recent years there has been a 30-40% gap between permissions and housing starts

- **Gap of around 30-40%** between the number of permissions given for housing and starts on site within a year. Estimate that for a year's permissions for housing around:
 - **10-20%** do not materialise into a start; the permission ‘drops out’: this could be because -
 - the landowner cannot get the price for the site that they want
 - a developer cannot secure finance or meet the terms of an option
 - the development is later not considered to be financially worthwhile
 - there are supply chain constraints hindering a start.

There may be scope to reduce this through policy.
 - **15-20%** are not abandoned but a **re-permission** is sought, for example to make a major change to plans or to extend the development period.
- Recent data and realities of private market suggests need to **plan for permissions on more units than housing start/completion ambition**.



Extract from slide presentation “DCLG Planning Update” by Ruth Stanier Director of Planning - HBF Planning Conference Sept 2015

The Local Plans Expert Group (LPEG) Report also recommended that “*the NPPF makes clear that local plans should be required not only to demonstrate a five year land supply but also focus on ensuring a more effective supply of developable land for the medium to long term (over the whole plan period), plus make provision for, and provide a mechanism for the release of, developable Reserve Sites equivalent to 20% of their housing requirement, as far as is consistent with the policies set out in the NPPF*” (para 11.4 of the LPEG Report). It is suggested that the Council should also consider allocating reserve sites.

In the housing trajectory (in Appendix A) it is critical that the Council's assumptions about deliverability of sites are correct and realistic. It is essential that the Council's assumptions on lead-in times and delivery rates are supported by parties responsible for delivery of housing and sense checked by the Council using historical empirical data and local knowledge. To date the Council has experienced difficulties with HLS due to the delayed start of

strategic sites. Our representation is submitted without prejudice to any further comments made by other parties about the deliverability of specific sites included in the Council's housing trajectory. Indeed other parties may be able to demonstrate that the Council's assumptions about the HLS are not robust thereby reducing the Council's 5 YHLS below 5 years. If there is not reasonable certainty that the Council has a 5 YHLS the Local Plan Part 2 would be unsound as it would be neither effective nor consistent with national policy. Moreover if the Local Plans Parts 1 & 2 are not to be out of date it is critical that the 5 YHLS is achieved and maintained otherwise under the NPPF "*relevant policies for the supply of housing will not be considered up to date if the LPA cannot demonstrate a five year supply of deliverable housing sites*" (para 49). The Council should also consider the implications of the housing delivery test as proposed in the recently published Housing White Paper.

Question 2

The expansion of the strategic allocations (Melton Road, Edwalton; South of Clifton; and East of Gamston / North of Tollerton) is not a matter for the Part 2 Plan as it is concerned with non-strategic allocations. The expansion of these sites should be considered when the Part 1 Plan is next reviewed.

Questions 3 to 27

The Council should be allocating sites in all locations in the key settlements of East Leake, Keyworth, Radcliffe on Trent, Ruddington and West Bridgeford as well as other villages such as Bingham, Cotgrave, Aslockton, Whatton, Cropwell Bishop, East Bridgford, Gotham, Sutton Bonington and Tollerton. The HBF do not comment on the merits or otherwise of individual sites. When allocating sites the Council should maximize housing supply via the widest possible range of sites, by size and market location so that house builders of all types and sizes have access to suitable land in order to offer the widest possible range of products. The key to increased housing supply is the number of sales outlets. Whilst some strategic locations may have multiple outlets, in general increasing the number of sales outlets available means increasing the number of housing sites. The maximum delivery is achieved not just because there are more sales outlets but because the widest possible range of products and locations are available to meet the widest possible range of demand. This approach is also advocated in the Housing White Paper which states that a good mix of sites provides choice for consumers, allows places to grow in sustainable ways and creates opportunities to diversify the construction sector.

Question 28

The Council should also consider proposals set out in the recently published Housing White Paper "Fixing The Broken Housing Market" in particular :-

- the production of an up to date sufficiently ambitious plan which recognises and plans for homes that are needed starting from an honest assessment of the need for new homes ;
- from April 2018 a standard methodology for assessing housing needs which will be used as baseline for calculating 5 YHLS and housing

delivery test in the absence of an up to date plan (meaning a plan that is less than 5 years old) ;

- effective planning means meeting as much of its housing requirement as possible and working with other authorities to ensure difficult decisions are not ducked which is set out in a Statement of Common Ground ;
- the review of Local Plans at least once every five years. If not reviewed the adopted Part 1 Plan will become out of date at the end of 2019.

Conclusion

For the Rushcliffe Local Plan Part 2 to be found sound under the four tests of soundness as defined by the NPPF the Plan should be positively prepared, justified, effective and consistent with national policy (para 182). The Council should consider the aforementioned responses in order to avoid preparing a Local Plan which is unsound because it is inconsistent with national policy, not positively prepared, improperly justified and so ultimately ineffective. It is hoped that these representations are of assistance to the Council in preparing the next stages of the Rushcliffe Local Plan Part 2. In the meantime if any further information or assistance is required please contact the undersigned.

Yours faithfully
for and on behalf of **HBF**

Susan E Green MRTPI
Planning Manager – Local Plans