

**Local Plan 2016 consultation document issued December 2016**  
**Comments for the Examination by the Inspector**  
**Comments by Ian Briggs, Treasurer Park Residents Association**

**Matter 3 Housing Need**

**Q7 adjusted OAN**

Based on comments below on Q12 backlog there is no backlog and there has been no under delivery, and the SHMA addendum concludes no market adjustment is needed so no proportional uplift is needed.

**Q12 Backlog**

Having met with the planning department I continue to believe there is no backlog and that an error was made in extracting the housing target when calculating the housing backlog. The target they used is the gross requirement but it should have been net requirement as the comparison is to completions less demolitions.

The SHMA 2016 Addendum table 3.3 shows the average annual backlog calculation comparing Completions 369 minus Demolitions 130 equal to the total net 240 to the 2006 Local Plan Average Housing Target 309 to give backlog of 69.

The 309 has been calculated by using the gross requirement in the 2006 plan of 4,634 divided by 15. The 2006 local plan gross requirement of 4,634, annual 309, was made up of Net Requirement of 3010, annual 201, and Clearances to be Replaced of 1,624, annual 108.

2006 Local Plan (Table H1: Current Strategic Housing Requirement page 101)

	2002/2016	annual based on 15 years
Net Requirement	3,010	201
Clearance to be replaced	1,624	108
Gross Requirement	4,634	309

Therefore the target for completions less demolitions should be 201 not the 309 used for monitoring purposes.

If we compare the actual average net delivery of ten years of 240 to the net requirement of 201 you can see that the target has been exceeded and therefore

there is no backlog. Even if you look at the Objective Assessed Housing need 2016 – 2031 including job growths the projected need is only 240.

Conclusion backlog is zero so current housing demand is overstated by 705, this would also impact the 20% buffer and affordable housing allowance calculation so reduction in housing need would be 846. In addition, there is no under delivery so the NPPF Para 47 buffer would not be needed in the first five years.

#### **Q14 20% buffer for affordable housing**

This buffer of 860 dwellings is described as to allow for flexibility if sites stall and to help address the affordable housing shortfall. In terms of the flexibility I believe the Para 47 buffer in the first five years addresses this, at the moment we have a contingency on a contingency.

For affordable housing it is not clear what level will be delivered over the plan period, the five year supply position paper does not refer to the mix of housing being delivered. The contingency of 860 was added between the May and December version of the local plan. If we compare the table 8 Future Housing Supply over the Next 15 Years in the May 2016 version of the local plan to the December 2016 version the total dwelling delivery has moved from 6072 to 6199 a small change. Looking at the mix change it does not suggest that substantial number of affordable housing has been added so this contingency has not improved the delivery of affordable housing.

#### **Housing Needs Q16 Demolitions**

EX/HBC/62 Housing Demolitions and Replacement Evidence Document

The paper highlights that there is an opportunity of 1,950 demolitions from the 3,250 identified dwellings and that a 50% windfall is reasonable.

However, there is no comment on the occupancy rate of the houses to be demolished. In the 2006 plan replacements were only proposed for occupied properties being demolished. The SHMA Addendum 2016 table 3.1 Market Signals identifies 727 houses as long term vacant if we assume they will all be within the 3,200 stock of potential demolitions this would represent 22%. I would suggest the replacement requirement would be reduced to 1,520 a reduction of 430 houses.

Also of potential concern is the rate of demolitions, the historical average referred to over ten years of 130 included one year 2007/2008 of 575 representing 44%. If the average chosen had been based on the five years 2011/2016 total demolitions of 387 it would have been 73 a year or 1,095 over the 15 year period a reduction of 845 houses. Combined with an occupancy rate of 78% the replacement requirement would be 57 a year or 854 over 15 years. Using a 50% windfall rate the brown field land would have a dwelling capacity of 548 (50% of 1,095).

It is worth highlighting that the application of the NPPF para 47 buffer target of 20% in the first 5 years means that of the 1,950 demolitions 780 would need to be in the first five years to match the plan targets.

### **Presentation of Demolitions in the plan**

I believe the housing target breakdown table 6 is confusing and a more appropriate way of presenting would be to show the gross demolitions to increase the total completions required but then deduct the demolitions to show the net housing target requirement. The future housing supply would then show windfall building on brownfield land from demolitions. A restated table 6 Housing Target Breakdown is below.

### **Restated Table 6 Housing Target Breakdown**

Suggest table 6 below incorporating the backlog and demolition adjustments suggested above.

**Table 6 Housing Target Breakdown**

	Annual	Over 15 years
SHMA Housing Requirement	240	3,600
Historical Backlog	0	0
OAN Total Requirement	<b>240</b>	<b>3,600</b>
Replacements for Demolitions (78% occupancy)	57	854
20% Buffer and Affordable Housing Allowance	48	720
<b>Total Completions</b>	<b>345</b>	<b>5,174</b>
Demolitions	(73)	(1,095)
<b>Proposed Annual Housing Net Requirement Target</b>	<b>272</b>	<b>4,079</b>

The Table 8: Future Housing Supply over the Next 15 Years should then have an additional line showing windfall building on brownfield land from demolitions of 548 (50% of 1,095). This would increase the approximate dwelling capacity from 6,199 to 6,747. This would be compared to the total completions required of 5,174. This would suggest dwelling capacity could be reduced by 1,500.

This presentation would be consistent with the SHMA addendum calculation of the backlog that compared the completions less demolitions to a housing target. In the Q12 backlog comments I have already highlighted that the 2006 target was extracted incorrectly.