

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

*Matter 7 –Housing Land Supply*

**Q3 Total supply – windfalls**

The current plan shows the windfall of 50% of demolitions as a reduction of demand by 975. It would be better to show the 1,950 demolitions at 100% and then include the brown field as a windfall on the total dwelling delivery. Table 8 - Total Dwelling Delivery of 6,199 should have a new line added for brown field land of 975 increasing the total to 7,174.

I have used the current plan to illustrate my point in Q5 I question the level of demolitions.

**Q5 Windfalls**

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.

The paper does not explore the timing of future demolitions and therefore the potential availability of brownfield land. 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.

Of 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. It would also reduce the brownfield supply from windfall from 975 to 548 (50% of 1095).

**Q7 persistent under delivery**

There has been no under delivery.

Having met with the planning department I continue to believe 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. 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.

**Q10 Annual Housing Requirement**

The current plan has demolitions of 1,950 the lead-in time and delivery rates should be considered, as the delivery will require significant organisation and fund raising effort and therefore is unlikely to be realised evenly over the plan period. In particular the first five years are unlikely to happen if initiatives have not currently been started.

**Q12 Monitoring the plan**

As indicated in my comments on Q7 the target was incorrectly extracted from the 2006 local plan, I believe the target to used for monitoring should be explicitly stated and should be the NET REQUIREMENT i.e. completion less demolitions. This is the way the on going annual monitoring reports have been prepared.

Using the current plan demolitions 1,950 with a 50% windfall I would update the five-year as follows. The first five years is currently showing 492 a year add the windfall 65 plus the NPPF para 47 buffer of 20% the new total gross requirement would be 570. To obtain the net requirement we would then deduct the demolitions 130 plus the NPPF para 47 buffer of 20% to give a net requirement of 414.

	Baseline	after 20% buffer
Housing target plan	410	492
Increase by windfall	65	78
Gross Requirement	475	570
Less Demolitions	(130)	(156)
Net Requirement	345	414