

**Gladman Developments Ltd**  
**North West Leicestershire Local Plan Examination**

**Matter 5**  
**Housing Land Supply**



**December 2016**

# 1 HOUSING LAND SUPPLY

## 1.1 Introduction

1.1.1 The Council issued additional evidence to the Examination relating to housing land supply on 7 December 2016. This has provided very little time to review the information submitted within the deadline of Monday 12 December 2016. This evidence should have been provided prior to the submission of the Plan.

1.1.2 We have therefore considered documents EX17 – 22 as far as possible within the timeframe allotted, but wish to flag that we would have preferred a longer timeframe in order to properly review the new evidence and prepare detailed representations, if we had so wished.

## 1.2 Does the Housing Trajectory demonstrate realistically that the housing development for which the Plan provides will come forward within the Plan period?

1.2.1 In the light of the late publication of evidence, we are unable to respond to this in detail; however, we note that the Background Paper (document EX/17) records at paragraph 7.2 that the revised trajectory identifies a reduction in total housing delivery over the plan period. This now shows 10,592 dwellings will be delivered, as opposed to 10,769 dwellings previously proposed and a total of 3,591 dwellings are claimed to be deliverable within the next 5 years.

## 1.3 Is it robustly demonstrated that the Plan can deliver a Five Year Housing Land Supply (5YHLS) throughout the Plan period, calculated in accordance with national policy and guidance, taking account of past delivery performance and applying the appropriate five or twenty per cent supply buffer. [BP/04]

1.3.1 Gladman do not consider a 5 year supply of housing sites can be robustly demonstrated. In reference to our representations to Matters 1, 2 and 3, we do not consider the Submitted Local Plan has been based on a Full Objective Assessment of Housing Needs (FOAN).

1.3.2 On the behalf of Gladman, Barton Wilmore (BW) has updated evidence on the FOAN which was presented to the Council last year in representations to the Publication Version of the Plan and also at the Green Hill Road, Coalville Inquiry<sup>1</sup>. That evidence was found to be robust in comparison to the out-dated 2014 GL Hearn SHMA on which the Council still rely.

1.3.3 The evidence of Mr Donagh and complementary evidence of Mr Lucas, demonstrate a housing need **of between 82,518 and 93,489** dwellings across the eight constituent districts of the Housing Market Area (HMA) for the period 2011-2031. This work precedes the joint councils' HEDNA work, which has been completed but remains unpublished.

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<sup>1</sup> EIP Document EX/13

1.3.4 The updated BW FOAN report for North West Leicestershire (NWL), submitted with the Hearing Statement for Matter 3, provides for an FOAN range with **a minimum FOAN of 687 dwellings per annum** being required to meet the needs of the NWL community over the plan period (13,740 dwellings between 2011 - 2031). This FOAN will:

- Accommodate the housing need number implied by the latest demographic evidence; and
- Meet projected job demand including the East Midlands Gateway Rail Freight Interchange (EMGRFI)

1.3.5 As an Authority which is relatively unconstrained, there is no evidence to suggest that the Council could not accommodate the FOAN over the plan period and support a requirement to match.

1.3.6 In the light of this evidence, the Council's recently published 5 year supply statement (document EX/22) shows that completions in the first five and a half years of the Plan period (1 April 2011 – 30 September 2016) totalled **2,690 dwellings**. In comparison, the FOAN over this 5.5 years, based on a minimum of 687 dwellings is **3,778 dwellings**. This results in **a backlog of 1,088 dwellings**.

### **The Correct Delivery Buffer and Addressing Accumulated Shortfall**

1.3.7 Document EX/21 'Housing Completions April 2011 – October 2016' sets out that over the last five and a half years of the Plan period (1 April 2011 – 30 September 2016), on only one occasion has the FOAN of 687 dwellings been met (in 2014/15). The Council has accepted that a 20% buffer should apply in recent S.78 appeals and this is considered appropriate in the light of the persistent under-delivery against the BW FOAN.

1.3.8 In terms of addressing the accumulated shortfall from previous years, the NPPG sets set out that the Sedgefield method (i.e. seeking to address any shortfall within the next 5 years) is the correct approach<sup>2</sup>. This must be the correct approach if the Council is to boost significantly the supply of housing in North West Leicestershire in accordance with the NPPF (paragraph 47).

1.3.9 We note and support the Council's approach of adding the delivery buffer to both the requirement and any accrued backlog.

### **What is the Supply?**

1.3.10 The above considerations result in the following calculation of housing land supply (overleaf):

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<sup>2</sup> Paragraph: 035 Reference ID: 3-035-20140306

<b>Five Year Housing Requirement - <u>Base Date 1 October 2016</u></b>	
<b>5 Year Requirement (687 * 5)</b>	3,435
<b>Previous Under Performance (1 April 2011 – 30 September 2016) To Be Addressed Over The Next 5 Years</b>	1,088
<b>Sub Total</b>	4,523
<b>Requirement Plus 20% Delivery Buffer</b>	5,428
<b>Annual Requirement For NWLDC</b>	1,085
<b>NWLDC Projected Completions</b>	3,591
<b>Supply (Years) (3,591 / 1,085)</b>	<b>3.3 years</b>

- 1.3.11 From the above and notwithstanding that it has not been possible to scrutinise the identified supply of sites, it is clear that the Local Plan does not include a 5 year supply of deliverable housing sites. On the basis of the minimum FOAN, there is shortfall of 1,837 dwellings and it is clear additional sites are required if the Objective of the Local Plan of addressing the communities housing needs is to be met.
- 1.3.12 For reference, were a 5% buffer applied, this would still not provide for a 5 year housing land supply. The 5 year requirement with a 5% buffer would be 4,749 dwellings (950 dwellings per annum), resulting in a supply of 3.78 years and a shortfall of 1,158 dwellings.
- 1.3.13 Please note the above calculations are on the basis of the minimum FOAN, prepared by BW. Clearly, if the Inspector was to support the upper range figure of 727 dwellings, then this would result in a further shortfall.
- 1.3.14 On the basis of the foregoing, the Plan does not include a deliverable 5 year supply. It is therefore not in accordance with paragraph 47 of the Framework, nor paragraph 156 of the Framework as it will fail to deliver the homes and ultimately the jobs needed in North West Leicestershire. The Plan therefore is also inconsistent with the plan-making section of Paragraph 14 of the Framework, requiring that Local Plans meet Objectively Assessed Needs.