

Matter 3: The Supply and Delivery of Housing Land

Examination hearing statement

Prepared by Framptons Planning Ltd

On behalf of:

1. A C Lloyd Ltd
2. Northern Trust Ltd

Respondent Reference Number: 5958 and 6105

Main issue: Whether the approach towards the supply and delivery of housing land is justified, effective and consistent with national policy.

Questions:

This response relates to Questions (3), (4), (8), (9) and (10)

1. In terms of questions 3(a), (c) and 4, we can confirm that the Council's housing supply information for the urban brownfield allocation (H02 part) former Sewage Works south of Harbury Lane; greenfield allocation (H02 part) land south of Harbury Lane (Grove Farm) and greenfield allocation (H03) south of south of Campion School, Sydenham are correct. We are working with the Council to deliver the housing trajectory.
2. As regards question 8, the Framework (paragraph 47) and the PPG (3-035-20140306) sets out how LPAs should deal with past under delivery. Where there has been a persistent record of under delivery of housing, the Council should increase the buffer to 20%.
3. The table below sets out the actual delivery of housing against targets identified by the potential emerging WDLP targets and the targets from the previous adopted Local Plan and RS including the period when in which a housing moratorium applied (i.e. 2005 – 2009).

Year	526 dwellings p.a. RS target	395 dwellings p.a. Adopted Local Plan target	606 dwellings p.a. 2012 based SNPP demographic part return to trend	720 dwellings p.a. 2011-2029 WDC endorsed OAN Target	825 dwellings p.a. 2011 - 2029 CE Labour Supply Target	886 dwellings p.a. 2011 - 2029 CE Labour demand target	Actual Delivery Net
2005-06	526						782
2006-07	526						523
2007-08		395					606
2008-09		395					427
2009-10		395					188
2010-11		395					97
2011-12			606	720	825	886	137
2012-13			606	720	825	886	269
2013-14			606	720	825	886	283
2014-15			606	720	825	886	491*

* Completions until 28/2/15 only

4. As can be seen the application of the housing moratorium did have an effect in reducing the scale of house completions. However since 2009 there is a considerable level of undersupply when assessed against any of the possible targets over the past 5

years. Moreover since March 2012, i.e. the introduction of the Framework there was little evidence of the Council in its decision taking being prepared to boost the supply of housing. Whilst the situation has changed in the last 12 months, following the Council losing planning appeals, the Council's Planning Committee (against the advice of officers) has been more than ready to switch off the supply if its considers that a 5 year supply exists. Overall, the Council's record since the end of the housing moratorium demonstrates a persistent undersupply of housing relevant to prevailing economic conditions and justifies a 20% buffer being applied under paragraph 47 of the Framework.

5. In terms of questions 9 and 10, it is difficult to assess the ability of the Local Plan to deliver a five year supply or the local plan requirement on the basis that the extent of the requirement is uncertain at this stage – see responses to Matters 1 and 2.

Framptons
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