

Local Plan Part 1: Rushcliffe Core Strategy

Full Inspector's Report (08/12/2014)

A stepped housing requirement was supported by the Inspector, as the Plan relied on delivery from large SUEs that would have long lead-in times to delivery:

"Policy 2 of the Local Plan, based on the SHLAA Report 2013 [EX29], puts forward a delivery pattern for housing with some 2,350 new dwellings in the period 2013-2018. This would amount to 470 new dwellings per annum, compared with an annual average of just over 770 dwellings required to provide the full 13,150 dwellings over the plan period 2011-28. The ideal delivery pattern would be based on some 770 dwellings per annum in each of the first five years, with an allowance for past under-supply and added buffer. As the HBF commented, there is no evidence that housing needs will be less in the early than later years of the plan. It calculated that Rushcliffe was unable to identify a 5 year housing land supply.

As explained by the Council in its Housing Implementation Strategy [EX30], a significant amount of new development in Rushcliffe is to be provided from the three sustainable urban extensions. The SHLAA has found limited sites in and around the main urban area, and I accept that an alternative approach based on an increase in provision on smaller sites in more rural locations would weaken the strategic approach to urban concentration and place pressure on the Green Belt. The Updated Housing Background Paper [EX33] analyses delivery rates for different sources of housing supply including strategic site allocations, housing in key settlements and from 'infill and change of use in broad locations'. I accept that significant reliance on the sustainable urban extensions is likely to mean a comparatively slow build-up in delivery rates. However, evidence from developers and landowners for all three sites indicates collaboration with the local authority and other stakeholders, and expectations that housing delivery will begin in 2015 or 2016." (para's 63-64)

"My attention was drawn to the approach taken in Leeds where the Core Strategy put forward a lower rate of housing delivery in the early years than subsequently. A modification to the Plan was proposed and consulted on, which stated that the figures for the early years applied to delivery and did not alter the need to maintain a 5 year supply of housing, based on the annual average requirement for the whole plan period. However, the Examining Inspector amended the proposed modification in his report emphasising that the lower figure was the housing requirement to 2016/17. I see no need for Rushcliffe to revise its approach on the basis of experience in Leeds." (para 66)

Leeds City Council Core Strategy

Full Inspector's Report (05/09/2014)

A stepped housing requirement was supported by the Inspector to allow for necessary infrastructure to be provided to support new development:

"As indicated above and acknowledged by the Council, the calculation of need should not be influenced by matters such as past build rates and infrastructure (and reference to such in the Plan is removed by MM5). However, as recognised by the PPG, considerations such as environmental constraints and infrastructure will need to be addressed to inform specific policies in development plans. Spatial Policy 1 seeks to achieve sustainable growth by, amongst other things, matching the provision of new homes and jobs with the infrastructure necessary to support them.

The evidence submitted by the Council to the May hearing, together with the Infrastructure Delivery Plan illustrate the challenges faced by the Council in providing the infrastructure necessary to support the growth planned in the Core Strategy. I have some sympathy with those that argue that the Council should have planned better for the provision of infrastructure. However, the phased approach will help the Council manage growth and allow for the Council and its partners to gear up for the higher build rate post 2017.

MM6b as proposed by the Council states that the 3,660 relates to delivery and does not alter the need to maintain a 5 year supply of housing against the requirement set out in the Plan (based on a rate of 4,375 per year over the Plan period). However, for the reasons given above, the housing requirement, until 2016/7 is 3,660. That rate is set to enable the Council to match housing growth with, as far as is possible, the provision of the infrastructure necessary to support it. The NPPF at paragraph 14 requires local planning authorities to meet objectively assessed needs unless any adverse effects of doing so would outweigh the benefits. To base the requirement on a figure higher than 3,660 per year before 2017 would, given the provisions of paragraph 49 of the NPPF, severely undermine the Council's ability to plan for sustainable growth with potentially serious consequences for the people of the city and district.

Consequently, I have amended MM6b and its associated target in the monitoring schedule to state that the housing requirement to 2016/7 is 3,660 per year. Notwithstanding this, there is a need for housing and affordable housing in Leeds now and the 3,660 dpa build rate should not be used to prevent the delivery of a higher figure provided it can be satisfactorily accommodated. MM6c allows for a higher rate to be achieved." (para's 22-25)

Greater Nottingham Aligned Core Strategies (joint)

Full Inspector's Report (24/07/2014)

The Inspector supported a backloaded housing trajectory with a higher requirement in the later years of the plan:

"The Councils have identified how a minimum of 30,550 will be provided in the Districts over the years 2013-18, 2018-23 and 2023-28 in the table in Policy 2 and in the housing trajectories. The Councils have confirmed that there is no intention to restrain or phase housing delivery. Although the table shows a slow start to delivery, especially in Nottingham City with some 4,400 new homes in 2013-18 rising to 5,950 in 2018-2023, the Councils argued that these figures reflect a feasible but ambitious plan for housing provision, and are consistent with evidence in the Greater Nottingham Housing Market & Economic Prospects study by G L Hearn Limited [CD/KEY/02]." (para 96)

"In this case, I am satisfied that the prospective build rates for each 5 year tranche do not represent an attempt to suppress house building in the early years or rely on past poor economic conditions to justify low housing targets. The proposed build rates are supported by convincing evidence on the operation of local housing markets in the GL Hearn report [CD/KEY/02], which found the proposed levels of housing delivery in the ACS for each of the three Authorities to be ambitious but feasible. In the first five years, housing delivery would be less than the annual averages for the 17 year period. As the Councils argued, however, significantly increasing the supply of sites in the early years would not necessarily speed delivery, would require the release of additional Green Belt land contrary to national policy, and could delay progress on some of the more challenging regeneration sites.

My attention was drawn to other planning authorities with recently adopted Local Plans which do not envisage smooth housing trajectories. I have had regard for these and the Examining Inspectors' reports, although my conclusions for this ACS are based on the local evidence and local circumstances. The Hunston judgment and other appeal decisions for particular sites where a Local Plan was outdated should not, in my opinion, prevent the three Authorities from defining locally distinctive housing trajectories and 5 year housing provision figures, in accordance with sustainable development." (para's 99-100)

Gravesham Local Plan Core Strategy

Full Inspector's Report (22/07/2014)

The Inspector supported a backloaded housing trajectory with a higher requirement in the later years of the plan:

"Ideally, all of the increase in new housing supply arising from the main modifications, and indeed, as much as possible generally, would be "frontloaded"; that is delivered as quickly as possible. Or, more correctly, as quickly as possible providing that all other necessary infrastructure, services and facilities, including affordable housing, can also be provided alongside, to facilitate sustainable development in accord with the NPPF.

However, it is effectively common ground that this is simply not practical in Gravesham at the moment. This is for a number of reasons, varying from the state of the local housing market, the need for some existing employment uses to first relocate/reorganise and the absence of any other realistic alternative, strategic level, potential sites that are outside the Green Belt, to the capacity of the local house building industry to "up its game" from a relatively low start point.

Therefore, it is not unreasonable in this specific local context to accept, as in the case of Dartford adjoining, that new housing delivery in this borough will have to be "backloaded" instead. This is to be achieved through a varying new housing trajectory incorporating material increases in delivery over three distinct parts of the overall plan period that takes account of the underprovision of new housing since the 2011 base date. It is necessary for soundness, including to assist monitoring, that this new housing trajectory is included as an Appendix to the plan (MM 40)." (para's 44-46)

West Lancashire Local Plan

Full Inspector's Report (31/10/2013)

The Inspector supported a backloaded housing trajectory with a higher requirement in the later years of the plan. The Plan proposed to release Safeguarded and Green Belt land that would inevitably have a lead-in time before completions were delivered:

"Perhaps more importantly, the Plan relies on the release of safeguarded and Green Belt land to meet a substantial proportion of the housing requirement. As this land cannot be released until the Plan has been adopted, there will be an inevitable lead-time before houses can actually be built on it. Account must be taken of this fact in order not to set targets that are impossible for the Plan to meet.

Bearing these factors in mind, my view is that in the first five years of the Plan period, the Plan should seek to meet the average requirement derived from the 2011-based interim housing projections, that is to say 257 dpa, plus a proportion of the accrued shortfall of 679 dwellings against the NWRSS requirement for 2003-2012. The shortfall itself should be distributed as evenly as possible across the Plan period, so as to ensure that it begins to be addressed immediately and is eliminated by the end of the period. This results in a requirement of at least 1,510 dwellings, or 302 dpa in the five years 2012-2017.

Notwithstanding the fact that the DCLG interim household projections cover the period to 2021, I consider that the residual Local Plan requirement should then be distributed evenly over the remaining 10 years of the Plan period, so as to ensure that the anticipated recovery in demand is not artificially constrained by any under-provision. On this basis, the requirement for 2017 to 2027 would be 335 dpa (rounded), or a total of at least 3,350 dwellings." (para's 60-62)