

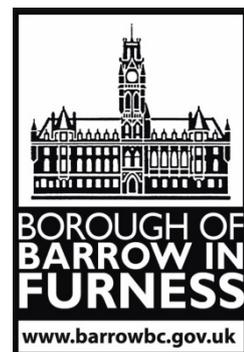
Barrow Borough Local Plan Examination

Hearing Statement Matter 6:

The supply and delivery of housing land

Barrow Borough Council

May 2018



Inspectors MIQ's:

Matter 6: The supply and delivery of housing land

Issue

Whether the approach towards the supply and delivery of housing land is justified, effective and consistent with national policy?

Questions

1. What is the estimated total supply of new housing in the plan period 2016-2031? How does this compare with the planned level of provision of 119 dwellings per annum (1785 in total)?
2. What is the estimated total supply in the plan period from:
 - Completions since 2016
 - Existing planning permissions
 - Other commitments eg sites subject to section 106 agreements
 - Windfalls on sites over 0.1 hectares
 - Windfalls on sites under 0.1 hectares
 - Proposed site allocations
3. What are the assumptions about the scale and timing of supply and annual rates of delivery from these sources? Are these realistic? Has there been any discounting of sites with planning permission other than Brady's Barrow and Buxton Street, Barrow? Are there other sites which should be discounted?
4. How have windfalls been defined and what evidence is there to support future estimates? Are the assumptions justified and appropriate?
5. What is the approach to the re-occupation of empty homes? Is this justified? Should an allowance be made for this element?
6. How has flexibility been provided in relation to the supply of housing? Are there other potential sources of supply not specifically identified? How would other sites within development boundaries be considered and could they add to the supply?
7. Has there been persistent under-delivery of housing? Should the buffer be 5% or 20% having regard to paragraph 47 of the NPPF?

8. How should any shortfall in delivery since 2016 be dealt with?
9. What would the requirement be for a five year supply including a buffer and accommodating any shortfall since 2016?
10. Would the Local Plan realistically provide for a five year housing land supply on adoption? Will a five year supply be maintained?
11. In overall terms would the BBLP realistically deliver the number of dwellings required over the plan period?

Council Responses:

Issue 6 The supply and delivery of Housing land

Question 1 Response:

1.1. The estimated total supply over the full plan period is 2992 homes. The supply is much higher than the total requirement of 1785 dwellings which will ensure that an adequate supply is maintained even if some sites do not come forward as anticipated or delivery is slower than expected. Further information can be found in the Barrow Borough Local Plan Housing Trajectory (EL4 009).

Question 2 Response:

2.1. A breakdown of the supply can be found on page 4 of the Barrow Borough Local Plan Housing Trajectory (EL4 009). The supply comprises the following:

Type of Site	Dwellings over the plan period
Completions since 2016	166
Extant planning permissions (at 31 st March 2018)	798
Other commitments e.g. sites subject to section 106 agreements	0
Windfalls over 0.1ha	253
Windfalls under 0.1ha	319
Emerging allocations	1469
Demolitions	-13
Total	2992

Question 3 Response:

3.1. The assumptions used are discussed on page 3 of the Barrow Borough Local Plan Housing Trajectory (EL4 009). Assumptions are only used where developers delivery timescales have not been provided. Assumptions are realistic as they are based on past trends.

3.2. In light of representations on the issue of stalled extant permissions, such as those from Story Homes (EL17 029), progress on each site with extant permission has been reviewed using building control inspection records. A total of 16 sites have been discounted as development has stalled, there has been no recent progress and no delivery timescales have been provided. Development has commenced on all 16 sites therefore they could be developed over the Plan period, however the Council has taken a cautious approach and has discounted them from the supply. If they were all developed in full this would add a further 130 dwellings to the supply.

3.3. The Council does not consider it necessary to apply a non-implementation rate as discussed in paragraphs 1.23.11 to 1.23.15 of the Housing Land Need and Supply Topic Paper (EL1 013)

Question 4 Response:

4.1. Paragraph 4.17 of the Housing Land Statement 2018 (EL4 008) defines windfall sites as *“those which have not specifically been identified as available in the Local Plan process”*. The same definition is given in the Housing Land Need and Supply Topic Paper (EL1 013). The evidence for the inclusion of a windfall allowance is found on pages 67-69 of the Topic Paper and on pages 15-18 of the Housing Land Statement 2018 (EL4 008). The assumptions are based upon past trends and are justified and appropriate.

Question 5 Response:

5.1. Although the NPPF allows Councils to make allowances for bringing empty homes back into use, the Council does not have an Empty Homes Strategy at present and an allowance has not been included for this reason.

5.2. The Council aims to produce an Empty Homes Strategy following the adoption of the Local Plan and will take the document into account when producing any Local Plan Review. See para 7.1.27 of the Local Plan Submission Draft (EL1 001).

Question 6 Response:

6.1. Flexibility has been provided by identifying surplus sites to meet the requirement over the plan period. The BBLP also contains a number of policies (e.g. H5, H7,R17, EC4) to support development on windfall sites and sites allocated for other uses. If approved these could add additional homes to the supply in future years. The BBLP also avoids overly-prescriptive policies (e.g. in relation to design, density, yields etc.) to allow flexibility and encourage development.

6.2. Other sites within development boundaries would be considered as windfall sites and planning permission would be granted to develop such sites where it with the Development Plan. Following the grant of planning permission such sites would then be included in the 5 year supply (unless evidence demonstrated that they are unlikely to be developed over that period). Windfall developments have provided a high proportion of the housing land supply in the past as can be seen in Table 3 of the Housing Land Statement 2018 (EL4 008). They are expected to do so in the future as demonstrated in the Local Plan Housing Trajectory (EL4 009), particularly as the Local Plan only allocates sites over 0.1 hectares.

Question 7 Response:

7.1. See response to Matter 3, Question 2.

Question 8 Response:

8.1. The Council has added any shortfall since the start of the Plan period (2016) to the housing requirement (to which the 20% buffer is then added) when calculating the 5 year housing supply.

Question 9 Response:

9.1. The 5 year requirement at 1st April 2018 is for 802 net additional dwellings. The breakdown of the requirement (Basic + Shortfall + 20% buffer) is shown in Table 5 of the Housing Land Statement 2018 (EL4 008).

Question 10 Response:

10.1. Yes. The Barrow Borough Local Plan Housing Trajectory (EL4 009) shows that there are sufficient sites available to maintain a rolling 5 year supply over the full Plan Period.

Question 11 Response:

11.1. Yes, the Plan and supporting evidence identifies sufficient available sites to meet the requirement and the policies within the Plan have been positively prepared and support development in the Borough. The Council encourages pre-application engagement with developers in order to help enable them deliver the required number of homes over the plan period.

11.2. The Council has received applications on a number of sites included as proposed allocations and are aware of pre-application consultation and preliminary studies being undertaken on a number of sites.