



THE HOME BUILDERS FEDERATION

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Date: 28th August 2015

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Sent by Email only

Dear David,

Draft Strategic Housing and Employment Land Availability Assessment (SHELAA)

1. Thank you for consulting with the Home Builders Federation on the 2015 draft SHELAA.
2. The HBF is the principal representative body of the house building industry in England and Wales and our representations reflect the views of our membership of multinational PLCs, through regional developers to small, local builders. Our members account for over 80% of all new housing built in England and Wales in any one year including a large proportion of the new affordable housing stock.
3. We would like to submit the following comments, which will hopefully assist the Council in putting together a robust evidence base to support the continued development of the Local Plan.

Methodology

4. The HBF is largely satisfied with the methodology employed to identify sites and assess their suitability for inclusion within the SHELAA. We do, however, have the following comments.

Stage 2: *Determining which sources of sites will be included in the Assessment*

5. The identified sources are considered appropriate. The Council may, however, wish to consider reducing the housing site size threshold to sites capable of providing five or more dwellings to ensure it is consistent with the National Planning Practice Guidance (PPG), paragraph 3-010.

6. The HBF agrees with paragraph 2.25 that because the SHELAA is not a policy document a policy neutral stance should be taken to site assessment at this stage. Whilst it does not appear to be an issue at present it is important that sites which are not compliant with existing policies are not included in the five year supply calculation.

Stage 4: Determining which sites and areas will be surveyed.

7. The HBF recommends that sites be surveyed at the earliest opportunity, this is especially important for the identification of site allocations within the plan. Whilst desktop studies can yield a significant amount of data, this does not provide a full appreciation of the site and its characteristics. This will lead to inevitable inconsistencies in qualitative information between sites visited and those not visited. To ensure consistency and enable sites to be appropriately compared it is recommended that all sites are subject to a site visit for the purposes of this exercise and to ensure that robust and transparent choices are made at the allocations stage.

Stage 6: Estimating the Housing / Employment Potential of Each Site

8. The HBF agrees, with paragraph 2.32 of the SHELAA, that wherever possible pre-application, Local Plan submissions and early masterplanning information should be used to assist in assessing density. It is, however, recognised that this may not be possible in all circumstances.
9. Paragraph 2.33 identifies that the net developable area should be used to calculate density and utilises an assumed 70% site area for sites greater than 2ha to account for infrastructure and other facility requirements. Whilst this ratio may be appropriate in some instances the HBF would recommend developable site area also takes account of site characteristics as well as any discussions with landowners, site promoters or developers. The HBF agrees with paragraph 2.35 of the SHELAA that site constraints should also be considered.
10. The HBF agrees that 30dph is a reasonable assumption for the density of many sites providing it is based upon the net developable area and not the gross site area. This figure approximates to the average net densities nationally, albeit with significant variations between land use types and localities. In this regard the HBF also agrees that densities may be higher within town centres, although this will be dependent upon the individual site and its wider setting. Conversely it is also likely that in rural settings lower development densities would be more appropriate. Therefore whilst the HBF agrees the 30dph is a reasonable approximation in many locations the Council may wish to consider further amendments based upon local characteristics of the site and its wider setting.

Stage 7: Assessing when and whether sites are likely to be developed.

11. A significant factor missing from the SHELAA is any discussion upon lead-in times and build rates. These are essential elements of determining land supply, deliverability and a housing trajectory for the plan. Whilst such issues are often best discussed with site developers / promoters the HBF

recommends any assumptions be included within the update and consulted upon with the development industry.

The Current Housing Land Supply

12. The following comments are provided without prejudice to our consideration of the objectively assessed housing needs of the area. This will be addressed at the next stage of consultation upon the Local Plan following the finalisation of the Strategic Housing Market Assessment.

The Requirement

13. The three housing requirement figures identified in tables 3.2, 3.4 and 3.6 of the SHELAA all utilise the 'Liverpool' methodology for dealing with the under-delivery of housing by spreading this over the full plan period. The HBF considers this to be contrary to the NPPF, which seeks to boost significantly housing delivery and provide delivery without delay and the PPG, paragraph 3-035, which states;

'Local planning authorities should aim to deal with any undersupply within the first 5 years of the plan period where possible. Where this cannot be met in the first 5 years, local planning authorities will need to work with neighbouring authorities under the 'Duty to Cooperate'

14. It is our view that under-supply should be dealt with in the first five years of the plan and not spread over the plan period. This is consistent not only with the PPG but also numerous planning appeal decisions. Furthermore, whilst we concur that a 20% buffer should be added to the requirement in conformity with NPPF paragraph 47, it is considered this should be added to the annual requirement plus under-supply. Therefore we consider the relevant five year requirements for each of the scenarios would be (all figures are rounded);

- With Potash – 3,936 dwellings
- Without Potash – 3,180 dwellings
- RSS - 4,746 dwellings

The Supply

15. As noted previously the HBF agrees with the inclusion of sites outside of existing development limits at this stage (SHELAA paragraph 3.9). These sites should not, however, be included in the five year supply.

16. The HBF is also supportive of the Council not including a windfall allowance at this stage (SHELAA paragraph 3.12). If the Council is minded to include such an allowance at a later in the plan making process this will need to be fully justified and have regard to relevant emerging plan policies.

Outstanding Planning Permissions

17. The HBF is supportive of the Council's methodology for including a lapse rate as described in paragraph 3.16 and Appendix A.

Overall Contribution from Further Identified Sites

18. The SHELAA identifies 2,799 dwellings of the 0-5 year supply will come from further identified sites, which are sites not currently in the planning process. This represents almost 60% of the five year supply. Whilst the HBF has not undertaken a thorough examination of these sites and the likely delivery rates, this does appear optimistic. To verify the scale of this source it is recommended that assumptions relating delivery including developer interest, lead-in times and delivery rates are published within the SHLAA, together with an indicative housing trajectory. If discussions have occurred with land-owners / developers these should be clearly identified. Furthermore any Council owned sites should not be included without at least a Council decision to dispose of the site and indications of developer interest.
19. The HBF consider the level of delivery may be optimistic due to the fact that complex sites without planning permission can take 3 years or more from submission of an application before they begin to deliver. This is due to the time taken to gain consent, sign section 106 agreements and pre-commencement conditions and site preparation. Given the reliance upon such sites this element obviously has a significant impact upon the five year supply.

Information

20. I would be pleased to be kept involved in all aspects of Local Plan preparation as well as the development of other planning documents. I trust the Council will find the comments useful and I would be happy to discuss them further, if required.

Yours sincerely,

MJ Good

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