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Planning and Development

**BRECKLAND DISTRICT COUNCIL**

FURTHER STATEMENTS TO THE EXAMINATION INSPECTOR

**REPRESENTATIONS/STATEMENTS**

**March 2018**

## Matters 3 and 4

The following statements are provided to assist the appointed Planning Inspectors (API) to examine these two matters and to seek further information from interested parties. The two issues are closely linked and will guide initially the level of overall housing requirement and how delivery is to be achieved with monitoring as the plan moves forward.

We consider first the issue of under delivery over the period 2001-2017 and the forward 5 Year Housing Land Supply (5YHLS) from 1 April 2017.

Here we will be referring to the BDC “Statement of Five Year Housing Land Supply (31.03.2017)” (ST5YHS) publication dated July 2017, and the March 2018 Annual Monitoring Report publication addressing matters on achievement up to March 2017 and looking forward as a result of that monitor.

The current adopted Core Strategy cover the 25 year period 2001-2026 and confirms at paragraph 1.3 a development level providing 19,100 homes at an average annual rate of 764 (19,100/25). For some obscure reason the ST5YHS uses different baseline figures. We have therefore followed the 19,100 requirement figure for the 25 year period ending 2026.

The ST5YHS confirms;

a forward annual completion rate of 780 new homes is appropriate for the period 2017 to 2022 whereas the Core Strategy provides an annual rate of 764 (19,100/25) whilst the difference is a small at 16 completions per annum it becomes significant when the shortfall is measured at March 2017;

at the table, within paragraph 2.12, a shortfall of 2,481 over the period 2011-217 based on a Regional Spatial Strategy (abolished in January 2013) whereas the shortfall based on the adopted Core Strategy, is 3,090 [(764\*16)-9,143 completions in the period 2001-2017].

We take the view that the adopted Core Strategy 2001-2026 is the only document that can be used and relied upon in determining the housing requirement until it is replaced.

Accepting that a 20% buffer is required over the forward 5 year supply assessment for persistent under delivery we provide below the forward 5YHLS position from a base date of 1 April 2017 as follows:

5year Core Strategy Requirement 2017-2022	5*764	3,820	3,820
Add for shortfall incurred 2001-2017	3,090/9*5	1,716 <sup>1</sup>	3,090 <sup>2</sup>
Requirement + shortfall		5,536	6,910
Add buffer	Due to continuous shortfalls 20%	1,107	3,455
Total 5 year requirement		7,643	10,365
5 year supply	Para3.8 ST5YHS (addition corrected) from 3,605	3,668	3,668
Shortfall		3,975	6,697
<b>Supply in years</b>		<b>2.40</b>	<b>1.77</b>
<b>Supply in years set out in the ST5YHS at para 4.2</b>		<b>2.8<sup>1</sup></b>	<b>2.4<sup>2</sup></b>

<sup>1</sup> Liverpool methodology

<sup>2</sup> Sedgefield methodology

In real terms the shortfall at 2022 increases from 3,090 in 2017 to 3,242 [(21\*764)-9,134+3,668].

The current Core Strategy sets the delivery to 2026 and it is this figure that should form the basis of a stepped plan annual requirement to 2026 and the balance for the period 2026/36 the table below illustrates:

Total Reg 19 Plan Requirement 2011/2036	15,298	25yrs	612 ave; pa
Less Completed 2011/2017	3,004	6yrs	501 ave;pa
To Complete 2017/2036	12,294	19yrs	647 ave;pa
Completion to 2026 to comply with current Core Strategy Requirement 2001-2026 of 19,100 – 9,143	9,957	9yrs	1,106 ave;pa
To complete 2026-2036	2,337	10yrs	233 ave; pa

The evidence above confirms there is substantial shortfall in the delivery of provision of homes requiring urgent action/decisions in order to bridge a very substantial shortfall between now and 2026 irrespective.

The methodology of wiping the slate clean of past shortfall in promoting this Reg 19 Submission is misleading and suggests “all is well” with past delivery when the facts suggest something quite different.

Government is seeking to increase annual completion rates across the country by 50% compared with 2017 completions.

Applied to the Reg 19 Submission the annual delivery rate of 612 is in fact a reduction of 152 (20%) dwellings per annum; hardly a step towards increasing delivery.

It appears that the OAN is out of step with current Government Policy which is a nationwide policy rather than a localised assessed need and that rate necessary should be set at 1,100 per annum in the first 9years of the plan and the issue revisited at the next review of the plan in 5years time.

On this basis and assuming an increase in delivery rates we take the view that in the interim period 2017-2026 Breckland Council should look to be delivering a minimum of 1,000 dwellings per annum.

**Conclusion.**

Government is clear, it acknowledges there is a housing crisis and it is looking at Local Plans and reviews of Local Plans to rectify the problem as a matter of urgency.

The proposals contained in the Reg 19 submission does nothing to address the current chronic position in Breckland, in fact it does the opposite it makes the position worse, the proposed delivery rate of 612 per annum compares with current Score Strategy rate of 764 per annum a 20% reduction.

Delivery has been below requirement for the past 16 years and this current position is projected to continue up to and beyond 2026.

There is urgent need to reconsider the Reg 19 Submission to reflect current Government Policy that has been addressed through Ministerial statements.

On this basis we consider the Reg 19 Submission is unsound in that it fails to meet the three tests set out at paragraph 182 of the NPPF.