Comments

Site Specific Part 2 Local Plan - Publication Plan Consultation (18/12/19 to 12/02/20)

Comment ID 170
Response Date 12/02/20 11:26
Consultation Point Table 4.3 (View)
Status Processed
Submission Type Email
Version 0.2

Representation
Please use a separate form for each representation.

Which part of the Publication Plan does your representation relate to?
Table 4.3

Tests of Soundness
Do you consider the Local Plan is sound in terms of being:

- Justified
  - No
- Effective
  - No
- Positively prepared
  - No
- Consistent with National Policy
  - No

Duty to Cooperate

Do you consider the Local Plan to be compliant with the Duty to Cooperate? Yes

Reasons

Please give the reason(s) why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the statutory Duty to Cooperate.

Objection to Table 4.31. We object to the Council’s analysis of how the required housing land supply directed by the Joint Core Strategy (JCS) should be addressed in terms of allocations within the Site Specific Part 2 Local Plan (SSP2). In particular we object to the housing provisions for the rural areas set out in Table 4.3 which rely on windfall development to fulfil the JCS minimum requirements. The Table identifies a need to deliver 108 dwellings through windfall development within
the plan period to meet what would otherwise be a shortfall in rural housing provision. Whilst the Plan indicates that additional rural housing may be delivered in other ways, it would be inappropriate to account for this when making housing allocations. Furthermore, the use of a windfall allowance is only justified where there is compelling evidence that this will deliver a reliable supply.

2. In seeking to justify their use of a windfall allowance, the Council have prepared a Housing Land Supply Background Paper which sets out its rationale for rural housing windfall provision at Appendix 4b. In analysing historic windfall provision the Council rightly disregard a number of large windfall sites outside of settlement boundaries which have come forward in previous years and which would not come forward under current policy. They do however include a larger windfall site in Braybrooke within the settlement boundary which would similarly not be a commonplace occurrence. We feel that the Plan should not rely on similar sites coming forward in the current plan period. Discounting these larger sites, within the last 10 years and with the exception of 2008/09 which seemed to generate an unusually high level of windfall development, there have only been two years where the level of windfall development has reached the level allowed for in years 4-10 of the plan period.

3. We believe therefore that the allowance made for windfall development to meet the housing requirement for the rural areas is overly ambitious and certainly falls short of the requirement in the NPPF to demonstrate compelling evidence of a reliable source of housing supply. We feel that an analysis of historic rates of windfall development would suggest a more reliable delivery of perhaps 8 dwellings per annum and on this basis the SSP2 is not making ample provision for rural housing within the plan period. This could be addressed through the inclusion of an additional site or sites and this representation will address one such site which would be suitable for consideration.

**Attendance at the examination hearings**

If you are seeking to change the Plan, would you like to attend the examination hearings?  Yes

If Yes, please outline the reason(s) why, below.

To offer an alternative site in the face of a contested inadequacy in rural housing provision.

**Notifications**

Do you wish to be notified?  When the Plan is submitted for independent examination?  When the Inspector's Report is published?  When the document is adopted?