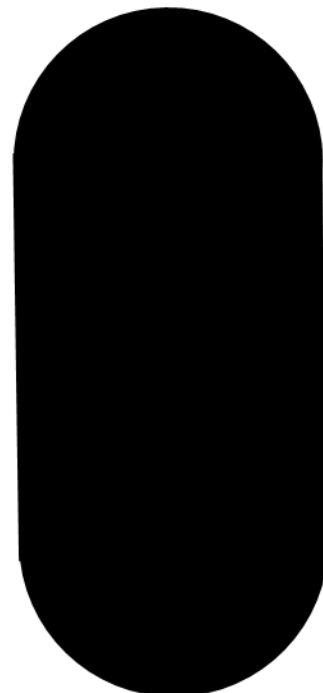
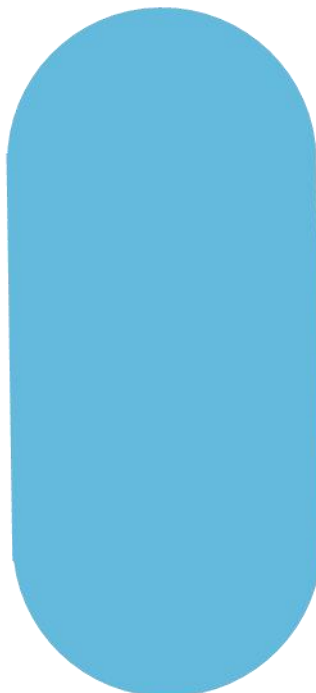


**WRITTEN STATEMENT IN RESPECT OF THE EXAMINATION OF
THE MANSFIELD DISTRICT LOCAL PLAN 2013 - 2033 (APRIL
2019)**

**MAIN MATTER 4 – WHETHER OR NOT THE APPROACH TO
ASSESSING HOUSING AND EMPLOYMENT NEEDS AND THE
HOUSING AND EMPLOYMENT LAND REQUIREMENTS ARE
ROBUSTLY BASED AND CONSISTENT WITH NATIONAL
POLICY**

On Behalf of Hallam Land Management Ltd



1. INTRODUCTION

- 1.1 This Written Statement is made on behalf of our client, Hallam Land Management Ltd, in respect of its interests in Land at New Mill Lane, Mansfield, as part of the forthcoming examination (EIP) of the Mansfield District Local Plan 2013 – 2033.

2. MAIN MATTER 4 – WHETHER OR NOT THE APPROACH TO ASSESSING HOUSING AND EMPLOYMENT NEEDS AND THE HOUSING AND EMPLOYMENT LAND REQUIREMENTS ARE ROBUSTLY BASED AND CONSISTENT WITH NATIONAL POLICY

- 2.1 The representations made below follow the form of the specific questions raised in the Inspector's Matters and Issues paper for the Examination. Only those specific issues/questions which our client wishes to respond on have been addressed below.

Issue –

Is the objective assessment of housing need (OAN) and the housing requirement in Policy S2 soundly based?

Questions –

1. What evidence justifies the use of the standard method to assess local housing need when the plan has been submitted for examination during the transitional period?
2. How has the plan's housing requirement of 6500 dwellings (325 dwellings per year) set out in Policy S2 been arrived at having regard to the 'starting point' of 279 dwellings per year set by the standard methodology?

3. Is the housing requirement of 325 dwellings per year justified when the OAN set out in the Strategic Housing Market Assessment (SHMA) (H4) and Demographic Update Paper (H5) is a different figure?

4 As the plan's housing requirement is based on the standard methodology, are there any implications arising from the revised Planning Practice Guidance which indicates the use of the 2014 based household projections as a baseline for the assessment of need?

2.2 Our client generally supports and endorses Policy S2 'The Spatial Strategy' for Mansfield district to 2033, in particular that the Mansfield urban area will take 90% of the district's new homes during the period of 2013 to 2033. It is agreed that the Mansfield urban area is the most sustainable location for development and should be where housing growth is focused. However, it is argued that the overall housing requirement for Mansfield should be higher.

2.3 Mansfield District Council, jointly with the other local authorities that make up the Nottingham outer housing market area, commissioned consultants to prepare the Strategic Housing Market Assessment (2015) to identify the scale of housing need. The Strategic Housing Market Assessment (2015) uses a range of information including on demographics, house prices, social housing and migration to identify a need within the district for 7520 dwellings during the plan period. This is an average of 376 dwellings per annum (dpa).

2.4 However, in its Housing Technical Paper (August 2018) and Housing Technical Paper Addendum (December 2018), Mansfield District Council argue that the provision of 376 dpa is not realistic based on previous annual delivery/completion rates in the district and the extent of the shortfall that would need to be made up in any 5 year housing land supply position within the plan. The Technical Paper then goes on to argue that the appropriate approach for establishing a housing need

figure for the emerging local plan is via a Standardised Methodology approach.

- 2.5 It is argued that since the Local Plan was submitted for examination in December 2018 (i.e. before the 24th January 2019 date when the NPPF's transitional arrangements ended), the local housing need within the plan should not be based on the Standardised Methodology approach. It should instead be based on the SHMA. The Council argues that the 2015 SHMA is out-of-date, however, a review of the SHMA was in fact carried out in 2017.
- 2.6 However, even if the Council's use of the Standardised Methodology is considered appropriate by the Inspector (which it is argued ignores the wealth of evidence undertaken to-date in relation to housing need), it is still contended that a higher local housing need figure than 279 dpa should be planned for in Mansfield District.
- 2.7 Paragraph: 008 Reference ID: 2a-008-20180913 of the NPPG states:
- 2.8 *'The housing need figure generated using the standard method may change when National Household projections and affordability ratios are updated by the Office of National Statistics and this should be taken into consideration by strategic policy-making authorities.'*
- 2.9 In September 2018, the 2016-based Household Projection figures were published by the Government. These figures supersede the 2014-based Household Projections, upon which the Council's determination of a Standardised Methodology figure set out within the Housing Technical Paper is based.
- 2.10 The National Planning Practice Guidance (NPPG) was amended on the 20th February 2019 (Paragraph: 015 Reference ID: 2a-015-20190220) to guard against the use of the 2016-based figures. The justification for this was because, nationally, the 2016-based figures led to a reduction in the

number of homes needed in the country. However, this was not the case for Mansfield District; use of the 2016-based figures for determining local housing need would lead to an increase in the number of new homes needed in Mansfield. Therefore, the sole basis for the Government's reticence in using the 2016-based figures as a basis for determining housing need, is not relevant in the case of Mansfield district. It is thus argued that there is strong justification for using the 2016-based household projections as a basis for determining local housing need in Mansfield.

2.11 Based on the 2016 Household Projection data, Marrons Planning has provided an alternative local housing need figure for Mansfield. The table below is a revised version of the table contained at para 5.13 of the Housing Technical Paper 2018 and follows the step by step approach to arriving at a minimum local housing need figure advocated by the NPPG at Paragraph: 004 Reference ID: 2a-004-20180913:

	Mansfield District Council's 2014-based approach	Marrons Planning's 2016-based approach
Households 2018	47,079	46,902
Households 2028	49,548	49,901
Total 2018 to 2028	2,469	2,999
10 Year Average	246.9 (rounded by 0.1% to 247)	299.9 (rounded by 0.1% to 300)

2.12 Following an identical process for the adjustment for affordability as set out at paras 5.14 – 5.16 of the Housing Technical Paper 2018, an

adjusted figure of 339 dwellings $((1 + 0.13) \times 300 = 339)$ is arrived at.

- 2.13 Following identical conclusions in respect of capping to those set out at para 5.18 of the Housing Technical Paper, and based on a 20 year plan period (2013 – 2033), there should be a minimum of 6,780 homes to be included within the emerging Local Plan (339 x 20 years).
- 2.14 An annual need of 339 dpa and an overall minimum housing need of 6,780 dwellings across the plan period is higher than the Council's determined housing requirement/target figure of 325 dpa (6,500 dwellings across the plan period), which includes an additional quantum of development based on the Council's economic growth aspirations.
- 2.15 As noted at Paragraph: 002 Reference ID: 2a-002-20180913 of the NPPG, *'The standard method...identifies a minimum annual housing need figure. It does not produce a housing requirement.'*
- 2.16 Given that the figure of 339 dpa is, in our view, the minimum housing need for Mansfield, then this must be the starting point for determining a housing requirement/target for the local plan. Following this, and as noted at paras 6.4 – 6.22, both the Council's growth aspirations and an appropriate buffer to allow for lapsed sites must then be added.
- 2.17 Through application of the Council's own suggested lapse buffer of between 10% and 20%, the local plan must provide a total of between 7,458 to 8,136 dwellings across the plan period. This would equate to a total of between 373 and 407 dpa.
- 2.18 Based on the above, it is clear that the current provision of Policy S2 of the Local Plan Publication Draft of 6,500 dwellings (325 dpa) is short of where it needs to be and significant additional housing allocation must be made in order to ensure that the Local Plan meets the housing demand of Mansfield and can be found sound.