



Mansfield Local Plan Examination Hearing Papers

Main Matter 4

Boyer

MANSFIELD LOCAL PLAN EXAMINATION

HEARING PAPERS

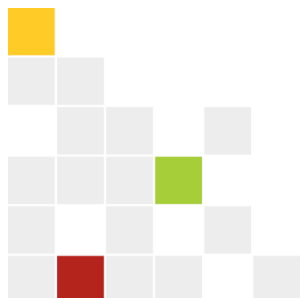
MAIN MATTER 4 – Whether or not the approach to assessing housing and employment needs and the housing and employment land requirements are robustly based and consistent with national policy

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

- 1.0 In the pre-submission Local Plan consultation, which ended on 1st November 2018, the proposed housing requirement was based on LHN calculation using the Government's standard method. The Plan was actually submitted for examination on 19th December, 2018. If it had been submitted one month later, then it would have automatically been examined under the 2019 National Planning Policy Framework (NPPF).

It is understood that the Council is seeking to justify the use of the standard method in four ways as set out in Paragraph 2.10 of the Housing Technical Paper Addendum (H2). The Council's four justifications and our response to each justification are set out as follows :-

- *The imminent introduction of the standard methodology* - The Council could have avoided the present dilemma by simply delaying the submission of its Local Plan for examination by one month;
- *The age of the 2015 Strategic Housing Market Assessment (SHMA) evidence which could be considered out of date* - The 2015 SHMA is over four years old but the Council undertook an update of this evidence in 2017. The updated information should be used;
- *The Council is concerned that 5 YHLS could not be achieved against the higher SHMA figure* - The Council cannot justify moving to a lower housing figure because they consider this an easier option. Such an approach is totally contrary to the Government's objective of boosting housing supply. That said, it is also considered that the Council have underestimated the supply of certain key sites within the Plan;
- *Neighbouring authorities have agreed* - This overstates the agreement reached by the Housing Market Area (HMA) authorities. Previously it was considered that the SHMA figure should be retained as a diversion away from this figure may undermine the HMA position resulting in a housing shortfall in the HMA.



Issue – Is the assessment of need for employment and the employment land requirement in Policy S2 soundly based?

- 2.0 It is considered that the Local Housing Need starting figure is based on 2014 Sub National Household Projections (SNHP) of 247 dwellings per annum, uplifted to 279 dwellings per annum to improve affordability using 2017 median house price to household income ratio of 6.03. This Local Housing Need starting figure of 279 dwellings per annum has been further increased to a housing requirement of 325 dwellings per annum because :-
- Average build rates since 2001/02 have been greater than 279 dwellings per annum. It was considered that this starting point figure would not represent a boost to supply to address housing affordability;
 - The starting point would not meet the economic growth aspirations of D2N2 Local Enterprise Partnership (LEP) or the District's employment land requirement. In the 2015 SHMA the job forecast (including Policy – On Nathaniel Lichfield Partners (NLP) adjustment for additional economic potential) identified a housing need of 328 dwellings per annum.

Issue - Is the housing requirement of 325 dwellings per year justified when the OAHN set out in the SHMA (H4) and Demographic Update Paper (H5) is a different figure?

- 3.0 From the evidence base provided, the 2015 SHMA identifies OAHN of 376 dwellings per annum based on a demographic need of 356 dwellings per annum using 2012 SNHP plus adjustments for 12 years migration trend, Unattributable Population Change (UPC) and Household Formation Rates (HFR) for the 25 – 34 age group.

The Demographic Update Paper identifies an updated demographic need of 338 dwellings per annum based on 2014 SNHP plus 10 years migration trend.

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

- 4.0 It is considered that there are no implications arising from the publication of the revised NPPG as the Council's Local Housing Need is calculated using the 2014 based SNHP. Using the 2016 based SNHP, the Local Housing Need starting point would be 338 dwellings per annum, which is the same as the proposed housing requirement.

Issue - Is the housing requirement of 325 dwellings per year aligned with the plan's economic strategy and jobs growth? How much of the figure can be attributed to needs arising from demographic change and how much to jobs growth? Does the evidence justify that approach?

- 5.0 The higher housing requirement of 325 dwellings per annum is to meet economic growth aspirations by aligning jobs growth and the Council's economic strategy. The uplift of 46 dwellings per annum above the Local Housing Need of 279 dwelling per annum is attributable to economic growth derived from the 2015 SHMA job forecast (including Policy-On NLP adjustment for additional economic potential), which identified a housing need of 328 dwellings per annum. The evidence justifies the approach.

However, it is noted that in this instance, the Council is content to rely upon evidence set out in the 2015 SHMA which may be considered out of date. As set out in response to Matter 1, this figure will need revising.

Issue - . Does the housing requirement take appropriate account of the need to deliver the identified need for affordable housing?

- 6.0 The 2015 SHMA identifies net affordable housing need as 64 dwellings per annum based on 30% affordability threshold. This represents circa 20% of housing requirement. Viability is challenging across the District, therefore affordable housing provision is set out on a differentiated basis across the District. Policy H4 requires affordable housing provision on sites of 10 or more dwellings in Zone 1 of a minimum 10% on greenfield sites and a minimum 5% on brownfield sites and in Zone 2 of a minimum 20% on greenfield sites and a minimum 10% on brownfield sites.

It is considered that as only greenfield sites in Zone 2 are required to provide minimum of 20% affordable housing, it is unlikely that affordable housing need will be met in full.

It is considered that the Council may not be able to meet full affordable housing needs. This is because to seek to deliver all identified affordable housing need as a proportion of market housing, may result in an unrealistic and undeliverable position. However, this does not necessarily mean that some increased provision could not be achieved.

The scope for additional housing above the Local Housing Need starting point of 279 dwellings per annum as a contribution towards meeting more affordable housing need was not considered. The proposed housing requirement of 325 dwellings per annum suggested to achieve economic growth will provide some additional affordable housing, but affordable housing delivery was not separately taken account of.