

MDC Response on Only Solutions Local Plan Housing Calculations

30.05.19

1. As part of the Local Plan, Only Solutions presented spreadsheets regarding the housing requirement and calculation of the buffer proposed above the housing requirement. This note responds to the information contained in EXAM1 and 1a provided during the Hearing Sessions.
2. It is understood that Only Solutions have identified three broad issues:
 - That the housing requirement should be reduced to reflect lower economic growth;
 - That additional elements of supply should be included; and
 - How the buffer has been calculated.
3. Each will be taken in turn.

Lower economic growth

4. It is important that employment and housing needs are aligned. As discussed, the proposed housing target of 325dpa was identified to broadly align with the level of employment land which is being planned for through the Local Plan; this is based on the D2N2 Strategic Economic Plan (2013 – 2033) (E5) although it is noted that a new Strategic Economic Plan has been published post-submission (E7). The SHMA (2015) (H5) identified that to deliver the level of growth being planned for would require 328dpa.
5. Only Solutions are of the view that the uplift for economic growth should not be included; this would reduce the annual housing target to 302dpa (6040 over the full plan period). They consider this is justified by reference to the D2N2 LEP Economic and Policy Review (E6) and the Centre for Cities Full Cities Outlook (provided as part of Only Solutions' hearing statement for Main Matter 4).
6. The view of the Council is that the SEP demonstrates considerable success in job growth across the HMA as set out in paragraph 1.1 of the Economic and Policy Review (E6). Local Authorities are also urged by the NPPF to "support economic growth and productivity" (paragraph 80), not to plan for decline which is what Only Solutions appear to be suggesting by referencing the Centre for Cities report. Furthermore there are no suppressed job growth targets for Mansfield, or indeed any other authority in the HMA, provided in the updated SEP.
7. Overall it is considered that a reduction of the employment land needed, and consequential reduction of housing need, is not justified and would require an update of the employment land study. The new Strategic Economic Plan was issued post-submission of the Local Plan and will be taken account of as part of the next review. Reducing the housing target to 302dpa would also not align with the requirement to significantly boost the supply of housing (NPPF 2012 paragraph 47) as it is below the annual average of homes built since 2001.

Additional supply elements

8. Only Solutions have identified two additional elements which they consider should be included in the supply. These are a 50% windfall allowance for 2018/19 to 2022/23 and an additional 150 dwellings in-line with the new Labour administration's manifesto.
9. A windfall allowance of 38dpa has been included in the last ten years of the plan period (2023/24 to 2032/33). The NPPF 2012 (paragraph 48) sets out that a windfall allowance can be included if there is compelling evidence. At present there is one year of windfall allowance within the five year period.
10. It is not considered appropriate to include a 50% allowance (i.e. 19dpa) for the first four years of the five year period. Windfall is uncertain and inclusion of too much windfall at the expense of specific allocated sites makes planning for infrastructure harder. There is also a risk of double counting with the small sites with planning permission already included in this period.
11. It is noted that the new Labour administration have a manifesto commitment to provide 150 affordable homes during their term in office. As set out in the MDC note on affordable housing (EXAM6), a number of the sites owned by MDC that are expected to provide affordable homes have already been included in the Local Plan; these will provide a total of 53 affordable homes. These sites have been identified as part of the existing housing revenues account capital programme which was the evidence used to prepare and submit the plan.
12. At present there is no additional information about further affordable housing schemes in terms of sites or resources. As such it is not possible to include an allowance for an additional 150 dwellings.

Calculation of the buffer

13. The Local Plan identifies a need for at least 6500 new homes during the plan period. Against this need the Local Plan identifies a total supply of 8726 dwellings. In preparing the Local Plan the Council have sought to ensure that there is an overall supply sufficient to deliver 6500 new homes with a buffer to allow for flexibility and take account of uncertainty in the delivery of sites; this buffer has been presented against the overall target of 6500 rather than the annualised target of 325dpa.
14. Only Solutions present a number of different ways of calculating the buffer (with and without elements of the supply including completions, planning permissions and the non-strategic allocations); they also consider that it should only be applied to the remaining plan period (2019/20 to 2032/33). Their key issue is understood to be that the buffer is too large and should be reduced to a maximum of 1,442 dwellings (EXAM1).
15. The buffer is currently 2,226 dwellings over the target of 6500; this equates to a buffer of 34%. A buffer of 1,442 dwellings, as suggested by Only Solutions, would equate to 22% of 6500 and require the removal of around 780 dwellings from the housing supply.

16. Whilst there are a number of ways calculating the buffer it is considered that the key issue is whether the proposed supply of 8726 will have an adverse impact on the district, such that a number of the sites should not be allocated. It is considered that the overall cumulative impacts of the supply and the impacts of the individual sites have been robustly assessed through the preparation of the Local Plan including through the Sustainability Appraisal (S8a-d, S9/S9a), Infrastructure Delivery Plan (IN1) and Habitats Regulation Screening Opinion (S10); in addition the NPPF 2012 (paragraph 47) sets out that local authorities should aim to boost significantly the supply of housing. As such it is considered that that the housing supply should not be reduced.