

Home Builders Federation

Matter 9

Matter 9 Site Allocations

Issue 14: Are the proposed site allocations selected using an appropriate methodology based on a proportionate evidence base? Are they justified and effective? Will the allocations address the land use requirements across the Plan period?

Questions:

8.2 Have the individual site allocations been chosen according to a robust site selection methodology?

The HBF's main concern with regard to the site selection relates to the limited evidence as to the availability of the sites that have been identified for allocation. Whilst the Council have looked to secure availability rather than ruling those out where no response was received the assumption by the Council appears to be looking for a negative response ruling a site out rather than a positive response being required to include the site in the local plan.

There are allocated sites, as highlighted in question 8.10 where there is no confirmation as to the availability of a site. What is almost uniformly the case where no response has been received is that the only source of the site that is mentioned in the Land Availability Assessment is the Urban Capacity Study. Whilst such studies can be helpful in seeking to identify potential sites, they cannot replace the need to show that a site is available for development that point envisioned in the local plan. These sites may come forward but there is no evidence to support the Council position. To move to allocation from the evidence in the LAA is not a robust approach to selecting sites to be included in the local plan.



It is noted that these sites are included in year 11 to 15 of the plan but it is still necessary for the Council to show that these sites are developable at the point at which it is assumed they will come forward. On the basis of the evidence presented these sites should not be included in the local plan as there is no evidence to suggest they are developable and it would appear that they have been allocated to inflate the number of homes that the council expect will be delivered over the plan period.

8.3 Are the site allocations justified and do they reflect the outcomes of the SA and testing of reasonable alternatives through the site selection methodology?

No further comment.

8.9 In terms of the sites which are identified as contributing towards housing supply during years 6-15 of the Plan period, is there a reasonable prospect that the site will be available and could be viably developed at the point envisaged?

See response to question 8.2. The HBF have concerns that the Council have not provided sufficient evidence in the LAA 2022 that some allocated for development in years 6 to 15 of the plan are developable.

8.10 The Land Availability Assessment 2022 (HOU002) states that in terms of assessing availability, a site is considered to be available when based on the best information available, there is confidence that there are no legal or ownership problems and that the land is controlled by a developer/ landowner who has expressed an interest in developing the site. Notwithstanding this text, A number of allocations within the LLA state that the 'landowner has not confirmed the site is available'. In addition, a number of representors have also made the case that particular site allocations are not available or there has been no response. These are summarised below. If this is the case, how is it possible for these sites to meet the tests required in terms of the Framework and the definition of developable – a reasonable prospect that they will be available.

The Council must provide evidence that the sites allocated for development in the local plan are developable. Without any up to date evidence that the owner of the site is seeking bring these forwards during the plan period it is not possible for the council to state with any confidence that these sites are developable. It would appear that the

Council have based their assumptions of availability on whether they have been told it is unavailable. The absence of a negative cannot be viewed as a positive. If sites are to be allocated and considered developable there must be recent and positive evidence that the site is developable at the point envisaged.

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