

From Ken Forest

Submission for Theme 1 - Matter 4.7
Five Year Housing Land Supply

I have supplied details of the latest planning situation in order to assist the Council to formulate its 2015 residential land supply. ~~Report enclosed as an appendix.~~ SEE SEPARATE SUBMISSION LETTER TO COUNCIL DATED 23rd MAY WITH DATA SHEETS

There are major doubts that it can demonstrate that it has a five year deliverable land supply as defined in the National Planning Policy Framework. Several of the sites have outline planning permission but are not making progress. It should also be noted that since 2006 to 2011 during the now expired Local Plan that expected an average of 333 dwellings per year (5000 in 15 years) has consistently under-performed compared to that level.

Also, since that time, the Regional Spatial Strategy that was in force shortly before this plan became a realistic document with a target dwelling delivery of 145 per year. More recently the decline and under-performance has been very significant. In such cases the NPPF indicates that a 20% buffer brought forward from year 6 six should be in place. This would equate to a current requirement of around 250 per year for 6 years (ie 1,500 approximately). I have major doubts that the Council can demonstrate that it has a five year deliverable land supply as required by NPPF - ie which is readily available now and deliverable. I have yet to see any convincing documentation that demonstrates this.

Earlier in the year I questioned the Hedging Lane outline permission for lack of progress. I was informed that talks were ongoing, but this does not assure me that the site is deliverable within five years. The last Local Plan expired in 2011 with a substantial shortfall of 700 fewer dwellings than targeted for. I challenged the Council by way of Judicial Review in 2006 mainly on the basis that the Anker Valley was not needed before 2011. The Council won the case (on the Wednesbury principle) but lost the argument. In March 2007 a press notice was released indicating an Anker Valley planning application would shortly be released. It never was. Developers do make statements which are not always fulfilled. I base my opinions on facts. The present Anker Valley proposal with outline planning permission apparently took many months even to sign the section 106 agreement. This indicates a reluctance, even now in 2015, to develop the site.

Many outline permissions are sought with the intention to sell on the land to another developer. This may take several years. It is a frequent occurrence that land owners "bank" the land and await more favourable economic conditions. This leads to regular renewal of expiring outline applications. I now monitor applications for signs of progress such as a discharge of conditions and applications for reserved matters approvals. These have been considered and noted and passed on to the Council.

These uncertainties I consider should be robustly addressed