

Matter 3: Housing

Supplementary Note 1 – Non Implementation Rates

Prepared by

KEMBER LOUDON WILLIAMS



**On behalf of
Mr C Simmons (Respondent ID 194)**

**Examination of the
Hastings Borough Council Planning Strategy**

February 2013

1 This note has been prepared on behalf of Mr Colin Simmons, at the request of the Inspector, in respect of whether non-implementation rates should be applied to the relevant components of the Hastings housing land supply.

2 This note seeks to show that non-implementation rates are an accepted, and current, industry practice when producing SHLAA housing evidence. In light of the view that our evidence be restricted to one example only, we would draw the Inspector's attention to the report on the Examination into the New Forest District (outside the National Park) Core Strategy DPD, by Michael J Hetherington, in which the following paragraph is of significant relevance:

3.8 Concern has also been raised about the 5% discount that the Core Strategy applies to large site commitments (column (b) of Table 2) to allow for an element of non-delivery. When considering the previous New Forest District Local Plan – First Alteration, the Local Plan Inspector recommended that, generally, a discount rate of 10% should be applied to housing commitments. I accept that the Core Strategy is intended to cover a substantially longer time period than the previous Local Plan. However, the Council has not provided specific evidence that supports my taking a more optimistic view than that of my predecessor. In this context, I do not rely upon a "further discount" in relation to the Hanger Farm (Totton) site, as completion of the additional units concerned is already anticipated to occur after the plan period. Furthermore, the history of development on a number of the sites identified in this category, some of which have already appeared at more than one Local Plan Inquiry and do not presently have planning permission, does not support confidence in their timely delivery. Accordingly, I consider that the suggested 5% discount is not supported by the evidence base, and I recommend that it be changed to 10% [included in RC2]. The revised figures are set out in the amended Table 2. Nevertheless, it will be seen that, taking into account the additional sites that have come forward, the resulting total for this column (1,250 units) represents a small increase over that in the submitted Core Strategy (1,230 units).

3 The full report has been provided for the Inspector's information.

4 In respect of the Inspector's own previous Examinations, it should be noted that the Central Lancashire Core Strategy was supported by the Central Lancashire Strategic Housing Land Availability Assessment. Like most Local Planning Authorities, the three Councils who jointly produced the evidence voluntarily agreed to a 10% non



implementation reduction. Other Local Planning Authorities, such as Broxbourne and Hart DC have also followed the same approach within their recent SHLAA documents, clearly indicating that this is not an 'outdated' approach.

- 9 In light of the Council's acknowledgement that no discounts have been applied, and the significant reliance on uncertain previous Local Plan allocation sites, we would respectfully request that the Inspector takes these comments into consideration and considers applying the industry standard 10% discount to the relevant components of the Hastings housing supply.

David Bedford MRTPI

13/02/2012

