

## **BHCC30 - Additional Statement in response to Amended Hearing Agenda Matter 3 Q7.**

**In preparing City Plan Part 1, by spreading the housing shortfall from earlier in the Plan period, the Council was able to demonstrate a 5.0 year housing land supply on adoption of that Part 1 Plan. However, the Examining Inspector concluded that the lack of flexibility in the housing supply would require very close consideration in the preparation of this Plan. The Council has confirmed that at present it is unable to demonstrate a 5 year housing land supply. In the context of the requirement set within the City Plan Part 1, has this Plan met the expectation to increase flexibility in the Council's 5 year housing land supply position in accordance with the Examining Inspector's expectations?**

In preparing CPP2, the Council has been very aware of the CPP1 Inspector's comments and has sought every opportunity to identify additional housing potential and to maximise housing on identified sites, subject to the city's physical, environmental and heritage constraints. The City Plan Part Two has sought to boost housing supply and improve the flexibility in the following ways:

### **Plan preparation stages**

- Sources of potential supply were rigorously considered through the CPP1 examination and the CPP1 examining inspector acknowledged at paragraph 29 of the CPP1 Inspector's report (CD23) that there were very limited opportunities to increase the supply of land for housing.
- The sources of supply for CPP2 therefore remain: identified larger sites considered suitable, available and deliverable<sup>1</sup> as proposed through SSA1-SSA4, H1 and H2; small identified sites with permissions; small windfall sites, redevelopment of secondary employment sites where there is an indication of availability and redundancy over the plan period; opportunities identified through the HRA Estates Regeneration/New Homes for Neighbourhoods (NHFN) and prior approvals for change of use to residential under permitted development rights.
- A 'call for sites' was undertaken as part of the 2016 CPP2 Scoping Paper (CD20) encouraging landowners to put forward sites for consideration; where sites were put forward at the later stages of the consultation their suitability was positively considered – as set out in the Site Assessment Topic Paper (TP07).
- The council also encourages submission of potential development sites on an ongoing basis for inclusion on the ED25 Brownfield Land Register.
- An independent review and verification of the council's approach to housing potential in the SHLAA (ED17) examined the achievability and delivery potential of housing sites (through a sample of sites) to ensure robustness of the SHLAA to inform the site allocation process.
- Detailed site appraisals were undertaken based on sustainability appraisal criteria, taking into account of constraints and opportunities informed site allocation (as summarised in Appendix 1, TP07).

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<sup>1</sup> Large sites in the SHLAA are sites of 6+ units. Sites of 10+ units are allocated through City Plan Part Two.

- The council proactively engaged with landowners on the availability of sites.
- In recognition of the city's constraints and limited land availability the site selection approach took a positive capacity-led approach informed by the SA assessment of options: the preferred approach of allocating all suitable sites that are developable within the plan period and can deliver 10 or more residential units.
- Proactive approach to site selection ensured that if a site met the capacity criteria, was known to be available, suitable and achievable within the plan period it has been proposed for allocation.
- All identified SHLAA sites of 10+ dwellings that are suitable, available and deliverable which do not already have planning permission or with permissions not yet started are proposed for allocation in CPP2.
- Comprehensive assessment of urban fringe potential and identification of sites for allocation through the ED21-ED24 Urban Fringe Assessments. Potential identified sites of 10+ dwellings are proposed for allocation in CPP2.
- TP06 Housing Provision Paper demonstrates that a total potential supply of 15,096 net dwellings is identified which is considered deliverable over the Plan period to 2030. This comfortably exceeds the minimum target set in CPP1 Policy CP1.

## **Policy**

- Strategic site allocations (SSA1-SSA4) set out minimum requirements for residential units and this allows for detailed design consideration to inform the exact amount of development but allows for the figures to be exceeded.
- The Urban Fringe Further Assessments in 2015 and 2021 (ED22 – ED24) has provided more detailed analysis of ecology, landscape and archaeological issues which has allowed the potential developable areas and housing capacity of urban fringe sites to be robustly assessed. Given the sensitivity of sites, the housing figures in H2 are indicative to allow for more detailed site assessment as the planning application stage to ensure specific constraints are addressed and environmental enhancements (including biodiversity net gains) secured.
- H1 housing allocations whilst expressed as indicative figures allow for detailed design considerations to inform the exact amount of development.
- Site allocations are supported by positive planning policies that will ensure the full and effective use of sites – encouraging high densities on brownfield sites, including by promoting taller buildings (6 or more storeys) in appropriate locations through CPP1 policies CP12 Urban Design and CP14 Housing Density. CPP2 Policy DM19 Maximising Development Potential will ensure the 'under-development' of sites is avoided supported by the Urban Design Framework SPD.

## Housing Delivery

- Through the Housing Delivery Action Plan (HDAP) (ED16) the council has analysed potential risks to housing delivery. The HDAP Section 8 sets out a range of Council actions to boost development, including by accelerating its direct delivery of affordable housing and by taking action to unlock stalled development sites. These actions include:
  - Direct council delivery of new affordable housing through the council's housing development programme, New Homes for Neighbourhoods (NHFN) which includes an ambitious corporate target to provide a minimum 800 additional council homes (and 700 other new homes that are affordable as possible). In addition, the council has formed a Joint Venture company with Hyde Housing (Homes for Brighton & Hove) which has set a target to build 1,000 affordable homes for low income rent and sale.
  - Partnership working to accelerate delivery and unlock stalled sites, including securing funding from the One Public Estate programme to support master planning and development delivery in the Hove Station area, and on sites at Brighton General Hospital and the Moulsecoomb Hub.
  - Actions to speed up the planning application process, by encouraging early developer engagement/pre-application enquiries and advice and encouraging the use of Planning Performance Agreements (PPAs) for larger applications.
  - Improving communication with housing providers to gain a clearer understanding of issues that may be constraining housing delivery, including regular council officer meetings with the local Planning Agents Forum (PAF) which comprises planning agents who regularly submit planning applications to the council.
- A significant quantity of residential units has been permitted since 2010:
  - Plan period average of 853 units over 2010-2020
  - A five-year average, 2015-2020 of 997 units and three-year average 2017-2020 of 1,250 units.
- As set out in TP06, Appendix 1 Table A1.6, the latest monitoring figures (1 April 2020) show 3,082 housing units under construction. ED16 HDAP Table 5 shows that over the period since 2013/14, there has been a steady upward trend in housing under construction which is expected to lead to higher delivery rates over the next few years reflecting build out of some of the city's higher density development schemes.
- The analysis of proposed site allocations provided in 'BHCC27 Additional Information – CPP2 allocations with planning consents' shows that planning applications permitted by the council which have exceeded the originally proposed CPP2 figures on a high proportion of the sites (including SSA3, SSA4, 8 H1 sites and 3 H2 sites) resulting in a total housing delivery 504 net dwellings above the Draft CPP2 allocations.

- This clearly shows the council's commitment to positive planning and maximising housing potential at the DM stage when determining planning proposals as they come forward.

The city is extremely constrained, and it remains important to balance housing delivery against other land uses in order to help meet the city's commercial, community and open/green space needs and deliver sustainable development. Within these constraints, the Council considers that CPP2 maximises the housing potential and the flexibility to meet and exceed the CPP1 housing requirement.