

AIREBOROUGH RESPONSE
SAP REMITTAL MM CONSULTATION – JANUARY 2022

MM1

Text - The Core Strategy Selective Review updated the Core Strategy housing target by lowering it from 70,000 to 51,952.

This needs clarity and should read 70,000 (2012 – 2028), to 51,952 (2017 – 2033). This is a key point behind Table 1 where clarity is also needed.

MM2 para 2.26

Text - This leaves a residual **net requirement of 46,352 homes which is to be allocated in the Site Allocations Plan. Based on the adopted housing target to 2033, the SAP is required to allocate sites for 31,867 new homes up to 2028. The SAP plan period is up to 2028.**

This is not in line with the Core Strategy 2019 CDREM2/1, it is both confusing and incorrect.

The net requirement of 46,352 is from 2017 – 2033. This is not the SAP 2019 plan period.

The SAP plan period is 2012 – 2028; thus the net requirement is to allocate 48,917 homes. This figure is made up as follows. (The figures account for both demolitions and windfall.)

- 2012 – 2017 5 years at 2,897 net pa = 17,050
- 2017 – 2028 11 years at 3,410 net pa = 31,867 (this is the figure given in the text)

Total 2012-28 48,917

The target for the whole planning period 2012 -2028 is important, because Core Strategy 2019, point 4.6.3, says that the previous 2012 – 2017 HMCA housing delivery [against SP7 target] will be taken into account. The reason for this is given in the Inspector's Report on the Core Strategy Selective Review dated 27 Aug 2019, **CDREM2/2**, point 52. See also note on MM3 re Table 1 below.

MM2 para 2.29

The text and part of policy HGR1 are both 'out of date', as we are past 31 December 2021. The SAP Remittal hearing was told by LCC that the review of the SAP would now happen in line with the Local Development Scheme **CDREM2/4**. The reason being that, as stated in para 2.28, the SAP has enough allocated land for its requirements 2012 – 2028. This policy is primarily associated with the allocation of Green Belt.

MM3 Table 1 and MM 11

This table is misleading. Further it is not in line with Core Strategy 2019 CDREM2/1 point 4.6.3 as described above at MM2.

- a) The column on housing target should be 1 April 2012–31 March 2028. Not 2017 - 2028.
- b) The penultimate and last columns should show performance for the whole SAP period.

This would then take account of Aireborough's full housing delivery and show an under performance of minus 309 rather than minus 493. Although 84 homes might seem small that was the allocation for one of the Green Belt sites of special landscape that has now been overturned.

HMCA	Completions 2012 - 2017	CS Target 2012 - 2028	SP7	HG1 Sites	HG2 Sites	Windfall	Total Supply 2012-2028	Performance 2012 -2028
Aireborough	695	1,467	3%	280	77	106	1,158	-309
TOTAL	9,117	48,917	100%	21,615	16,537	4,983		

If the Council wished to show the column for supply 2017–2028 it could add that, but the performance figure needs to be kept for the whole SAP period. This also means that the total of the performance figure of +11,268 is wrong. We do not know what it actually should be as the correct figures would need to be worked out across all the HMCAs.

As detailed in our response to the SAP Remittal Hearing February 2021, we disagree with the above figures for windfall land in Aireborough. We do appreciate though that the SAP 2019 is a point in time and that the above delivery and site figures in Table 1 are now out of date.

- c) large windfall sites are not being included in the figures, as they should be – see the High Court Judgement J146.

When both performance and windfall are taken into consideration then the Aireborough 'shortfall' reduces from **minus 493** to a shortfall from the indicative SP7 target of around **minus 54**

HMCA	SP 7 %	Housing Requirement Period	Housing Requirement	SHLAA Completions To 2020	2020 SHLAA* Supply to 2028	Large Windfall	Balance
Aireborough	3	2012 - 2017	512	696		13	+197
Aireborough	3	2017 - 2028	956	203	385	117	-251
Total	3	2012 - 2028	1468	898	385	130	-54

- These are sites started units not built, listed on 5yr land supply, SAP 2019 non-GB, HG2-30

MM9

51,952 needs to be clarified as the net target for 2017 – 2033

46,352 is the net target from 2017 – 2033. The net target for the plan period 2012 – 2028 is 48,917

MM 11

The net target for Aireborough in the SAP period 2012–2028 is 1,467. **NOT 956**. The latter is 3% of the 2017–2028 figure but does NOT take account of over delivery in the 2012 – 2017 period. See MM 3 for this and other figures given in this modification.

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For and on behalf of ANDF