

EX14

EXAMINATION HEARINGS

AGENDA

THURSDAY 7 NOVEMBER 2013 at 10.00 am

Matter 3 HOUSING PROVISION

Issue 1: Whether the proposed amount of housing development meets the objectively assessed needs of the borough.

- 3.1 Has the Strategic Housing Market Assessment (SHMA) been prepared in accordance with current guidance?
Why does the SHMA relate to only part of the housing market area?
The SHMA refers to the need for a full update by 2012 – why has this not been carried out?
- 3.2 What are the full objectively assessed needs for market and affordable housing for the borough, and how have they been derived?
Does the evidence base give a clear understanding of these needs – can the major differences between the SHMA and recent population and household projections be reconciled?
Should the Regional Spatial Strategy backlog since 2003 be included?
- 3.3 What level of population growth is envisaged by 2028 as a result of the planned 8,100 dwellings? Is this consistent with the overarching objective of population stabilisation?
What is the scale of population growth by 2028 in terms of natural change and net migration?
What level of new housing would be required to achieve a balance between in- and out-migration over the plan period (zero net migration)?
- 3.4 Have employment factors been taken into account in determining the scale of housing need?
In broad terms is the planned scale of new housing in balance with the anticipated growth in jobs? If not, what are the consequences for patterns of commuting?
- 3.5 What exactly is the reasoning behind the selection of the 8,100 dwellings target?

If it is not based on fully meeting objectively assessed needs:

- (a) should the dwelling target be increased to meet the assessed needs?
- (b) or alternatively, has the scope for neighbouring authorities in the housing market area to accommodate all or part of the unmet needs been fully explored?
- (c) or alternatively, are there compelling local circumstances which justify lower levels of provision? In particular, is there credible evidence of constraints on environmental and/or infrastructure capacity grounds to warrant lower levels of growth?

Issue 2: Whether the broad distribution of housing development across the borough is consistent with the spatial strategy and the evidence base.

- 3.6 What is the reasoning behind the broad distribution of new housing in policy CS 3? Is it consistent with any evidence of need within the four main sub-areas and the overall spatial strategy for the borough?

Would the proposed distribution lead to any significant change in the relative roles and functions of the settlements within the sub-areas?

Given the limited capacity for further housing in the urban area of Halewood, does the KLPCS make adequate provision to at least maintain Halewood's relative role among the four main townships?

- 3.7 How will implementation of the proposed broad distribution be managed?

What happens if, over time, housing delivery does not accord with the proposed broad distribution - is it necessary to have a contingency in place or to specify a certain level of deviation which would trigger a review of the policy?

Issue 3: Whether the KLPCS is sufficiently clear, effective and robust to ensure timely delivery of the proposed amount of housing development.

- 3.8 Has the Strategic Housing Land Availability Assessment (SHLAA) been prepared in accordance with current guidance?

Is there compelling evidence of specific SHLAA sites that do not meet the available, suitable and achievable tests set out in the NPPF?

Has the viability of housing sites been robustly assessed, particularly for sites in regeneration areas?

- 3.9 Are the density assumptions used in the SHLAA unduly cautious?

KLPCS paragraph 5.24 refers to densities “up to 40 dph” being appropriate – is this an upper limit and if so, are there not some locations where higher densities would be acceptable?

- 3.10 Is a 20% discount for non-delivery of SHLAA sites appropriate?
Is it right to not take windfalls into account?
- 3.11 How much of the need for affordable housing is likely to be met, realistically, over the plan period?
What are the implications for the objective of re-balancing the housing market?
- 3.12 How exactly will the phased release of housing land be managed?
Will the SHLAA sites be subject to phased release and if so, what mechanism will be used?
Is the plan effective without the inclusion of a phasing mechanism as part of policy CS 3?
- 3.13 Is the housing trajectory realistic and deliverable? Does it demonstrate a reliable 5 year housing supply (including NPPF 20% buffer) and developable sites for years 6-10?
KLPCS paragraph 5.23 refers to potential review mechanisms if the trajectory is not delivered – what are these and why are they not included in the plan?