

Issue 3: HOUSING – GENERAL - Policies CP1, WT1 and SH1

iv) Should the JCS address contingencies/alternatives, including in relation to the strategic allocations, in the event that completions do not come forward as expected?

1. We consider that the JCS should set out and make provision for its objectively assessed needs over the Plan period. The need for Local Plans to address this is specifically highlighted within the NPPF which states, under paragraph 21 that policies should be flexible enough to accommodate needs not anticipated in the plan and to allow a rapid response to changes in economic circumstances.
2. However, we do not consider it logical at this stage to suggest contingences / alternatives to what is an unsound Plan. Rather, we consider that the plan should be rewritten to provide for a much more credible level of housing and jobs growth, as opposed to a redrafting of a policy in a poorly considered and unsound plan.
3. When rewriting the JCS we consider that the LPA should then set out a contingency plan in line with Government policy and general good planning practice. We suggest that the following policy should be included in the redrafted JCS:

In the event that the Council identifies a shortfall of deliverable housing sites against its five year housing land requirements, it will favourably consider applications from the following sites provided they can evidence early delivery of the scheme:

We would suggest that a number of sites of varying sizes should be included to cover all potential scenarios and that these should be subject to public consultation.

A bullet point for each strategic allocation policy should be included, stating that if the strategic allocation fails to materialise, alternative sites will be considered.