

SESSION 4 HOUSING SITES

1. Is the allocation of housing sites based on a sound process of sustainability appraisal including testing of reasonable alternatives and does it represent the most appropriate strategy in the circumstances? Have the site selection and policy designation processes been based on appropriate criteria supported by a clear audit trail?

We raised concerns through the Deposit consultation on the uncertainty involved in the land supply, particularly given the fact that many of the sites have been identified as having constraints to development and have remained in Category 3(i) of the JHLAS for quite some time. This, we believe, raises questions as to the robustness of the land supply and the deliverability of the land allocated for development in the LDP.

In terms of the latest evidence, as a result of the 2011 JHLAS, additional sites were moved into category 3(i), with the latest Statement of Common Ground putting the land supply at 3.7 years.

It is clearly important to ensure the sites allocated in the LDP are viable and deliverable, particularly if the LDP has a strategy to reduce previous trends of decline and foster investment and growth. Therefore, we believe a thorough review of the allocations and existing commitments needs to be undertaken, in order to ensure they represent viable options for the delivery of housing over the LDP period.

End.

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