



**REBUTTAL – Housing Planning Policy, Housing Land Supply and Affordable Housing.**

**ON BEHALF OF THE LOCAL PLANNING AUTHORITY**

**APPEAL BY:** DLP on behalf of Hallam Land Management

**SITE AT:** Land at Junction With Carr Road

Hollin Busk Lane

Sheffield

S36 1GH

**APPEAL AGAINST:** Sheffield City Council

**LPA REFERENCE:** 17/04673/OUT

**PINS REFERENCE:** APP/J4423/W/21/3267168

**DATE:** 10/6/20

## 1.0 Introduction

- 1.1 This is a rebuttal proof of evidence prepared by Laura Stephens on behalf of Sheffield City Council in respect of Planning Appeal Reference APP/J4423/W/21/3267168.
- 1.2 The Proofs of Evidence (PoE) of Mr Roland Bolton on Housing Land Supply (**CD6.16**) and on Planning Policy (**CD 6.15**) and Mr James Stacey on Affordable Housing (**CD6.17**) have been considered and there are a small number of issues that the Council wish to clarify and respond to.
- 1.3 This rebuttal deals with matters relating to housing need and housing land supply, planning policy for housing and affordable housing.
- 1.4 I do not offer a response to all issues raised in the appellant's witnesses Proofs of Evidence (**CD6.14-22**). This should not be construed as acceptance that I agree with all other elements of those Proofs. Furthermore, points already made in Sheffield City Council's topic specific Proofs of Evidence, including where these are matters of disagreement with the arguments made by the appellants witnesses are not repeated.

## 2. Rebuttal of Roland Bolton's Proof of Evidence – Housing Land Supply (CD6.16)

- 2.1 Sites that the appellant and Council do not agree on, regarding inclusion within the deliverable 5-year housing land supply are listed in the Housing Land Supply Statement of Common Ground (**CD6.14**) and are not discussed further here.
- 2.2 In paragraph 5.13 and 5.14 Mr Bolton refers to the Council's Housing Revenue Account (HRA) Business Plans (**CD3.15/16**) and the noted impact from recent rent reductions. It should be noted that sites which form part of the Council's Stock Increase Programme and are included within the 5-year housing land supply (**CD3.7a/b**) under category B, are enabled through a scheme of borrowing against the HRA account and are not directly impacted therefore by income to the HRA itself.
- 2.3 Mr Bolton at paragraph 7.2 of his proof (**CD6.16**) notes that the Council anticipate revision to the 5-year housing land supply position to be available

by September 2021. The Council have indicated that it will be available by the end of July 2021.

- 2.4 Mr Bolton notes in paragraph 7.16 (**CD6.16**) that he has asked the Council for 2020/21 completions and this has not been forthcoming. This work has not yet been completed and therefore the Council are not able to furnish Mr Bolton with the requested information.

### **3. Roland Bolton's Proof of Evidence – Planning Policy (CD 6.15)**

- 3.1 At paragraph 7.29 (**CD 6.15**) Mr Bolton refers to the number of homes that Sheffield will need to plan for over the Local Plan period to 2038 based on the revised local housing need figure of 2,923 homes per year incorporating the urban centres uplift. He notes correctly that this would require delivery of 52,614 homes over an 18-year period. It should be noted that the Plan period as now calculated would be a 17-year period 2021-38, with a relevant net requirement of 49,691 homes utilising the same annual figure.
- 3.2 At Paragraph 8.13 (**CD 6.15**) Mr Bolton points to the net loss of affordable homes when taking account of Right to Buy sales. Whilst these sales have been significant, it is incorrect to set them directly against the identified annual affordable housing need set out in the SHMA (**CD 3.12**). The calculation of the need figure (currently 902 affordable homes per year) takes account of estimated losses through Right to Buy sales.

### **4. Affordable Housing Proof of Evidence (CD 6.17)**

- 4.1 In paragraph 4.20 (**CD 6.17**) the Proof notes that the working assumption in the SHMA (**CD 3.28**) is that 65 affordable dwellings are lost to Right to Buy per year, but the average (between 2004/5 and 2019/20) is 385 losses. That figure is incorrect. Table 6.1 of the most up to date 2019 SHMA (**CD 3.12**) clearly shows in line 10 that the number of units taken out through Right to Buy is 533 homes per year. The figure of 65 per year used by Mr Stacey appears to have been the figure used in the 2013 SHMA (**CD3.28**) which is clearly out of date. The use of the incorrect figure impacts the tables and figures within reported in Mr Stacy's proof (from figure 4.5 onwards) and is also reflected in para 3.2 above where the misunderstanding of how Right to

Buy sales are considered in relation to delivery of new affordable homes are indicated.