

Section B: Your Representation

Please complete a separate sheet for each representation that you wish to make. You must complete 'Part A – Personal Details' for your representation to be accepted.

Representations cannot be treated as confidential and will be published on our Consultation Portal. Any representations that are considered libelous, racist, abusive or offensive will not be accepted. All representations made will only be attributed to your name. We will not publish any contact details, signatures or other sensitive information.

Full Name	Hallam Land Management Limited
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Question 1: Which **Main Modification and/or supporting document** does your representation relate to?

Each Main Modification within the Schedule has a reference number. This can be found in the first column i.e. MM1, MM2

Any representations on a supporting document should clearly state which paragraphs of the document it relates to and, as far as possible, your comments should be linked to specific Main Modifications. You should avoid lengthy comments on the supporting documents themselves.

Representations on the Policies Map must be linked to specific modifications in that they reflect a change required as a result of a Main Modification.

Schedule of Potential Main Modifications	MM no.	<input type="text" value="MM4"/>
Sustainability Appraisal	para(s)	<input type="text"/>
Habitat Regulations Assessment	para(s)	<input type="text"/>
Policies Map or other supporting documents	Please specify	<input type="text"/>

Question 2: Do you consider this **Main Modification and/or supporting document**:

Legally Compliant?

YES

NO

Sound?

YES

NO

Question 3: If you consider the **Main Modification and/or supporting document** unsound, please indicate which of the soundness test(s) does it fail (please mark all that apply):

Not positively prepared

Not justified

Not effective

Not consistent with national planning policy

Question 4: Please provide details of either:

- Why you consider the **Main Modification and/or supporting document** to be sound or legally compliant; or
- Why you consider the **Main Modification and/or supporting document** to be unsound or is not legally compliant.

The proposed housing requirement in Main Modification 4 is not sound. It is not positively prepared as it fails to provide a strategy which as a minimum seeks to meet the area's objectively assessed needs. Secondly, it is not justified as it does not represent an appropriate strategy taking into account the reasonable alternative of meeting the area's objectively assessed needs. Thirdly, is it not effective as it is not deliverable over the Plan period as evidenced in Annexe 1. Finally, it is not consistent with national policy. These points are explained below.

Main Modification 4 proposes a housing requirement of 7,752 dwellings to be built over the Plan period (2016 to 2033). This equates to 456 dwellings per annum. Although a proposed main modification, the housing requirement has not changed from the Pre-Submission Local Plan.

The Pre-Submission Local Plan (February 2019) housing requirement was made up of the Local Housing Need of 350 dwellings per annum (paragraph 4.12), plus a 20% buffer to allow for supply to be maintained throughout the Plan period (paragraph 4.16).

Hallam Land Management Limited submitted representations (March 2019) to the Pre-Submission Local Plan Policy SP02 on the basis that it was not sound as it had not been informed by the Standard Method in National Planning Practice Guidance.

The Plan was submitted for Examination on 14th February 2020 without any proposed amendments to Policy SP02.

In its Matter 4 Hearing Statement (November 2020), the Council revised its Local Housing Need to 452 dwellings per annum to reflect the Standard Method at that time. The effect being that the 20% buffer to maintain supply was removed.

Paragraph: 008 Reference ID: 2a-008-20190220 of the National Planning Practice Guidance advises that local housing need calculated using the standard method may be relied upon for a period of 2 years from the time that a plan is submitted to the Planning Inspectorate for examination. As the Plan is unlikely to be adopted prior to February 14th 2022, the Plan cannot rely upon the previous Standard Method figure from February 2020.

As at November 2021, Local Housing Need based on Standard Method is now 459 dwellings per annum. 459 dwellings per annum equates to a Local Housing Need over the Plan period of 7,803 dwellings. Although the difference is modest, the proposed housing requirement in Main Modification 4 now no longer reflects the Local Housing Need as informed by the Standard Method. No exceptional circumstances are put forward to justify an alternative approach to Standard Method in accordance with paragraph 61 of the Framework.

The housing requirement figure is therefore not positively prepared as it fails to provide a strategy which as a minimum seeks to meet the area’s objectively assessed needs. Further, it is not consistent with national policy and paragraph 61 of the Framework. Further, it is not an appropriate strategy taking into account reasonable alternatives (i.e. including a housing requirement figure that meets the area’s objectively assessed need). The Council has not justified with evidence why it is unable to meet its objectively assessed needs.

Main Modification 4 also proposes a trajectory with an average delivery rate of 300 dwellings per annum to 23/24, 400 dwellings per annum to 29/30, and 984 dwellings per annum to 2032/33. This is illustrated in an amended housing trajectory at Annexe 1. However, Annexe 1 illustrates that the Plan will only deliver 7,146 dwellings over the Plan period (a shortfall of 606 dwellings against the proposed housing requirement in Main Modification 4).

Hallam Land Management Limited submitted representations as to the soundness of the original housing trajectory within Appendix 1 of the Pre-Submission Local Plan in March 2019, and suggested at that time that the Plan be modified to include additional site allocations to address the shortfall arising and make the Plan sound.

The housing trajectory has been updated on more than one occasion since the submission of the Plan in February 2020, and Hallam Land Management have consistently raised their concerns through the Examination process that the trajectories for specific sites were not realistic, and calling for additional allocations to ensure the Local Housing Need would be met. It is disappointing that this matter was not addressed earlier in the Examination process.

The trajectory within Main Modification 4 and Annexe 1 now therefore illustrate that the Plan is not effective and that the housing requirement is not deliverable over the Plan period. Further, it is not consistent with national policy as it does not make sufficient provision for new housing.

Please continue on a separate sheet if necessary

Question 5: Please set out what change(s) you consider necessary to make the **Main Modification and/or supporting document** sound or legally compliant, having regard to the matters that you identified above.

You will need to say why this change will make the Submission Version of the Local Plan sound or legally compliant. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as accurate as possible.

Main Modification 4 should be amended to include a housing requirement that reflects Local Housing Need based on the up-to-date Standard Method, with an allowance for flexibility, and a trajectory and supply of sites that demonstrates sufficient provision to meet the objectively assessed need

Please continue on a separate sheet if necessary