**Rebuttal – Planning Proof of Evidence, Roland Bolton CD4.10.1**

**1 Introduction**

* 1. This is a rebuttal proof of evidence prepared by Laura Stephens in respect of Planning Appeal Reference APP/J4423/W/20/3258555. I have read the Proof of Evidence (PoE) of Mr Roland Bolton on behalf of the appellant and there are a number of issues that I wish to clarify and respond to.
  2. This rebuttal deals with matters relating to housing need and housing land supply, as well as specific aspects of Local Plan policy. I do not offer a response to all issues raised in Mr Bolton’s Proof of Evidence, however this should not be taken as acceptance that I agree with all other elements of his proof.

**2 Matters of clarification**

2.1 Paragraph 4.16 (and 13.5) of Mr Bolton’s PoE Refers to the appeal site as an allocation identified as part of the Council’s 5 year Housing Land Supply (5YHLS). Whilst the site was included within the 5YHLS with base date 1.1.19 (CD4.10.2.6), it is not currently included within the 5YHLS with base date 1.1.20 (CD4.10.2.8) due to uncertainty of delivery resulting from the appeal.

2.2 Furthermore, paragraph 4.21 Refers to the Council’s net housing requirement figure of 2,230 homes per annum including a 5% buffer. The current net figure (CD4.10.2.8 paragraph 2.9) is 2,238 pa including 5% buffer.

2.3 I would clarify that the Council’s current local housing need as calculated using the standard method is 2,131 homes per year, rather than 2,124 as stated in paragraph 5.6 (which refers to the 2019 figure). There is also a mistake in the increased figure from 16 June which will be 2,877 rather than 2,788 (based on currently available information).

**3 The housing requirement, housing needs and land supply**

3.1 Mr Bolton notes in 4.22 that from 16 June 2021 the Council’s housing requirement will be uplifted by 35%; a point reiterated in 5.65. This reflects recently published guidance in planning practice guidance ‘Housing and economic needs assessment’ revised 16 December 2020. The PPG (paragraph 037 Reference ID: 2a-037-20201216) is clear that there is a transition period for decision-making for those authorities where the cities and urban centres uplift applies. The transitional arrangements apply for six months from the date of publication (i.e. to 16 June 2021), and mean that the local housing need calculation excluding the 35% uplift can be used for determining the housing requirement for calculating the 5 year housing land supply until that date. The uplift, and consequential significant change to Sheffield’s housing requirement from June 2021, with the associated impact on supply, is therefore irrelevant for the purpose of calculating the 5 year housing supply in relation to this appeal. Whilst it is a significant issue, which we accept, and which will be reflected through work on the Local Plan, for the purpose of this appeal the housing requirement and supply set out in the 5 Year Housing Land Supply Monitoring Report (CD4.10.2.8) remain the pertinent figures.

3.2 A further section (4.23 – 4.25) analyses recent completions in Sheffield and argues that the majority of accommodation completed has been apartments and student accommodation, largely located in the City Centre and Urban West Housing Market Areas. The analysis is drawn from information publicly available and provided by the Council and with the exception that it does not include the most recent year’s data (2019/20) it appears sound. Following this in paragraph 4.26 Mr Bolton highlights that the SHMA (CD 4.10.24) shows that the majority of people want houses rather than apartments and that there is a shortage of 3 bed houses. The conclusion to this finding, and analysis of recent completions, is drawn in 4.29 which identifies a mismatch between the location and types of homes that are needed and the supply. In response to this, I would acknowledge that in terms of supply of new homes, there is currently a heavy emphasis on apartments in and near the City Centre. However, whilst this is an issue to be considered through the Local Plan process, it does not negate the fact that the 5 year housing land supply is not assessed in terms of type, but in relation to quantum of development that is deliverable. Furthermore, it is too simplistic to expect all identified housing needs are to be dealt with through new housing, which makes up a relatively small proportion of overall housing supply in the city.

3.3 I am concerned with the assertion in paragraph 4.38 (and repeated elsewhere) that the 5 year Housing Land Supply position is both temporary and marginal. By its very nature the 5YHLS is annual and therefore in that sense temporary. The most recent position, published 18 December 2020 (CD4.10.2.8) has a 1 April 2020 base date and reflects the current position in no more temporary way than any other such annual assessment. I acknowledge that it will updated in the future with a base date 1 April 2021 which will provide the opportunity to take account to changes in how local housing need is calculated, however that is not relevant to this Inquiry. Furthermore, in relation to the assertion that the supply is marginal, it is a clearly demonstrated deliverable housing land supply in excess of the currently applicable housing requirement for the 5 year period. The degree of supply in excess of requirement is not determinative in this situation, where we accept the principle of housing development on the appeal site (as noted by Mr Bolton 4.35).

3.4 Further to the point I make in response to 4.38, it is irrelevant for Mr Bolton to make the point in paragraph 4.39 that the Council will not be able to demonstrate a deliverable 5 year housing land supply in the future once the new local housing need calculation including the 35% uplift comes into force. Firstly, the application of the new housing requirement will apply to a new 5 year period with a 1 April 2021 base date, and will not be retrospectively applied to the current 5 year period. Secondly, given that the new requirement will also be applied to a future base date, it will also reflect a somewhat different housing land supply taking account of homes completed during 2020/21 and new permissions granted where relevant. Whilst I agree with Mr Bolton’s assertion that Sheffield’s housing land supply is likely to be smaller, taking account of the impact of a significantly increased requirement, the scale of change cannot yet be known and therefore is not pertinent to discussion of the current 5 year housing land supply in relation to this appeal, other than to recognise that going forward the Council will need to continue to support housing delivery where appropriate.

**4 Local Plan policy**

4.1 A point that is raised a number of times (see paragraph 5.16, 13.12) is that Core Strategy policy CS24(c) identifies land at Owlthorpe as greenfield sites to be delivered for housing. I would agree that it is clearly stated in that policy that development greenfield land at Owlthorpe is an exception to the general policy objective of maximising the use of previously developed land for new homes. However, it is worth clarifying that the policy is not an allocation policy, and that the reference relates specifically to the use of greenfield land for housing in the context of prioritising previously developed land, rather than as an allocation. The policy does not specifically require that housing is developed in that location. That being said, we agree with the appellant that the principle of housing on the site is not being contested, and that the site is a housing allocation.