LOCAL PLAN FOR
BOLSOVER DISTRICT
EXAMINATION

Response to the Inspectors note on the consideration of dwelling completions and MHCLG tables.

28th January 2019
Local Plan for Bolsover District

Response to the Inspector's Note on the Council's Housing Land Supply

This is a response to the Inspectors note following the hearing on Thursday 24 January 2019.

The note related to concerns raised about the figures used in the Local Plan for calculating housing land supply and those sent to the Ministry of Housing, Communities and Local Government [MHCLG] by the Council for monitoring purposes, was brought to my attention. The former were said to be based on the dwelling being ‘wind and watertight’, whereas the latter are defined as ‘ready for occupation’.

As clearly set out in the Council’s response to Question A2, which has been added to the agenda for the rescheduled session on the 5 year housing supply on the afternoon of Wednesday 30th January, this is really not a significant issue in regard to the Local Plan.

The claims made by respondents were misleading. The method used for calculating the housing supply by the Council, counting watertight as an indicator of complete, produces the figures submitted by the Council to MHCLG to go into the Housing supply tables (Table 122) used by MHCLG as the most accurate assessment of annual changes in housing stock and the most comprehensive estimate of supply. These are the figures used in relation to the Local Plan.

The approach suggested by others relates to Tables 253a) which are figures based on Building Control responses, in part from Council Building Control officers as well as the national House Building Council and Approved Inspectors. The MHCLG set out that the figures are based on quarterly estimates and it appears to be more to do with measuring the activity of the house building sector, than consideration of Housing Supply.

Apart from the difference in definition of complete, there appears to be several other differences which are:

- Table 122 is based on a financial year, 253 a) on a calendar year
- Table 253a) does not appear to include conversions or changes of use but Table 122 does
- Table 253a) does not appear to include conversions or changes of use but Table 122 does
- Table 122 is based on an actual survey of all sites whereas table 253 a)

Regardless of at what stage a dwelling is counted as being ‘completed’, the estimates captured in Table 253a raise concerns over their accuracy. For example within the District, from survey work we know that between 2012/13 – 2017/18 169 affordable houses were built in the district. 88 of these from 2016 have been new council dwellings. However, for the same period Table 253a records 20 starts, and 40 completions; all of them being Housing Association, with no new Council houses either started or under construction.
However we have tried to compare the tables of completions in order to consider what the differences are, which gives rise to the following table

<table>
<thead>
<tr>
<th>Year</th>
<th>Table 253a)</th>
<th>LA Net (Table 122)</th>
<th>LA Gross</th>
</tr>
</thead>
<tbody>
<tr>
<td>01/04/2013 to 31/03/2014</td>
<td>170</td>
<td>136</td>
<td>244</td>
</tr>
<tr>
<td>01/04/2014 and 31/03/2015</td>
<td>240</td>
<td>253</td>
<td>281</td>
</tr>
<tr>
<td>01/04/2015 and 31/03/2016</td>
<td>220</td>
<td>326</td>
<td>332</td>
</tr>
<tr>
<td>01/04/2016 and 31/03/2017</td>
<td>300</td>
<td>293</td>
<td>302</td>
</tr>
<tr>
<td>01/04/2017 and 31/03/2018</td>
<td>240</td>
<td>251</td>
<td>257</td>
</tr>
<tr>
<td>Totals</td>
<td>1,170</td>
<td>1259</td>
<td>1416</td>
</tr>
</tbody>
</table>

This is based on adjusting the annual figures in Table 253 to align with the financial years.

Given the above facts and the Council’s previous note on issues raised about completions, the Council does not consider that it is necessary to amend its housing land supply calculations to take account of any variation in the completion figures, or propose any changes to the table after paragraph 5.9 in the Local Plan.

Whilst the Council would accept that it is desirable to have a system available that gives robust and trustworthy figures for Housing completions based on Houses that are ready for occupation, currently that is simply not available. The system we have and operate (utilising water tight as a surrogate for completed) provides year on year good quality data on the growth in Housing supply. This is the system we use, that the Government base their Housing supply tables on and which underpins the Local Plan.