



Hearing Statement on Behalf of Jelson Homes Ltd

Oadby and Wigston Local Plan Examination

Matter 2: Spatial Strategy – Housing

March 2018

1. Matter 2 – Spatial Strategy – Housing

Issue 1 – Whether the Spatial Strategy is the most appropriate having regard to all reasonable alternatives and the evidence base

Question 1 – Is the Local Plan timeframe of 2011 to 2031 appropriate and justified?

- 1.1 In our representations to the Pre-Submission version of the Local Plan, we observed that the NPPF requires Local Plans to cover an “appropriate” time period and “preferably a 15-year time horizon”. We also observed that, if adopted this year, the Local Plan would therefore only have a 13 year life, which would be at odds with Paragraph 157 of the NPPF.
- 1.2 In its ‘Local Plan Spatial Strategy Submission Statement’ (Document LP6/09), the Council presents its reasoning for proposing a plan period that extends only to 2031, rather than to 2036 as it had proposed in previous draft versions of the Plan. In short, the Council states that it has now proposed a plan period to 2031 on two grounds:
- i) to align itself with the Leicester and Leicestershire Strategic Growth Plan (SGP); and
 - ii) because evidence base (comprising the South-East Leicestershire Transport Study) has concluded that the local highway network would operate at capacity in 2031, and would not be able to accommodate any additional development beyond that horizon.
- 1.3 In relation to point i), the Council states in LP6/09 (Paragraph 6) that the SGP “deals with the time period 2011 to 2031 and 2031 to 2050 very differently”. Paragraph 1.5.2 of the Submission version of the Local Plan contends that the SGP “identifies a ‘notional’ housing need” for the period 2031 and that “there are no reliable estimates of population growth or household change” for the period 2031 to 2050.
- 1.4 While we accept that there is no evidence which deals with housing need up to 2050, HEDNA does provide an up-to-date assessment of housing need for the Borough up to 2036. It is important to note that Melton Borough Council, which is within the HMA, is preparing a new Local Plan which has very recently been subject to examination, and proposes a plan period to 2036. In addition, North West Leicestershire District Council (NWLDC), which adopted its Local Plan in November 2017, has immediately commenced a review of its Plan. NWLDC has indicated in consultation documents that its Plan, once reviewed, will have a plan period extending to 2036 and will rely on HEDNA as its evidence base in relation to housing and employment needs.
- 1.5 Furthermore, the Draft Strategic Growth Plan (Document LP2/02), which has been published for consultation between January and April 2018, confirms, on Page 5, that the distribution of housing “for the period 2011-36 will be set out in a Memorandum of Understanding which will be published in early 2018. This will be used as the basis for preparing or reviewing Local Plans with 2036 as an end date”.
- 1.6 It is evident, in our view, that the SGP does not preclude the preparation of local plans that extend up to 2036. Indeed, it actively encourages the preparation of plans with plan periods up to that year.

- 1.7 Having regard to all of the above, we conclude that the Council has mis-directed itself in taking the view that it needs to 'align' with the SGP, and that there is no 'reliable' evidence of housing need up to 2036. HEDNA provides an up-to-date assessment of housing need to 2036 (which other authorities in the HMA are relying on in their plan-making processes), and the SGP explicitly recognises that Local Plans prepared by authorities in the HMA can have plan periods up to 2036.
- 1.8 In relation to point ii), we note that the Council is relying on evidence which assesses the impact of developments in the Borough and in Harborough District, and identifies appropriate mitigation. That evidence concludes that HEDNA levels of growth and development in each authority area, up to 2031, can be accommodated. The Council has also contributed to a 'Joint Position Statement – South East Leicestershire Transport Study and Resulting Mitigation Study' (Document LP5/02). At Paragraph 7.1 of LP5/02, it is stated that further assessment of additional developments, beyond those already planned, would be required, and should be undertaken through the preparation of Local Plans which extend beyond 2031.
- 1.9 We have seen no evidence, be that technical, environmental or land availability related, that justifies a Plan period extending only to 2031. The Plan period should be to 2036 and if this begs difficult questions in terms of growth and how this is to be accommodated, then such questions should be engaged with positively and creatively. That is exactly what the plan-making process is about. We should not be entertaining a situation where the Council is allowed to adopt a Plan with a shorter than acceptable Plan period, just because this avoids it having to grapple with challenging issues. Kicking the can down the road is not an appropriate response when the country is in the midst of a housing crisis. If there are, as the Council claims, highway capacity issues beyond 2031 then it is the role of the Local Planning Authority and its partners, through the plan led system, to identify what the solutions to these capacity constraints are and to start to plan for them - not to simply give up.

Question 2 – Is the overall housing requirement figure of 2960 / 148 dwellings per annum (dpa) justified having regard to the Leicester and Leicestershire HEDNA (LP2/01)?

- 1.10 Our Client has three concerns about the Council's housing requirement.
- 1.11 First, HEDNA indicates that the Borough has an OAN for affordable housing which amounts to 143dpa in the period 2011 – 2031, or 139dpa in the period 2011 – 2036. However, HEDNA includes within the overall OAN for the Borough an upward adjustment (to the demographic need) of only 25dpa (2011 – 2031) to deal with affordability. There is no evidence or analysis to justify the figure of 25 (either within HEDNA or elsewhere) and, when compared with the actual level of affordable housing need, the adjustment is wholly inappropriate. Moreover, there is no evidence to suggest that the Borough cannot accommodate more than 148dpa and no evidence to suggest that the development industry cannot deliver more than 148dpa. We return to this below.
- 1.12 Secondly, the requirement makes no allowance for Leicester City's declared unmet needs. Whilst the scale of that need has not yet been fully quantified, the City Council has indicated previously that it could be as much as 15,500 in the period to 2036. Given the proximity of the Borough to Leicester (Oadby and Wigston form part of the Leicester Principal Urban Area), the housing requirement in this Plan should include an allowance for meeting an element of Leicester City's needs.

- 1.13 Thirdly, if the Inspector and the Council agree that the Plan period should actually be 2011 - 2036 as we argue, the base requirement (i.e. the requirement ignoring the above two concerns) will need to be increased in line with HEDNA to 155dpa, or 3,875 overall.

Question 3 – Have all reasonable alternatives been considered to address the provision of sufficient affordable housing?

- 1.14 The Borough's need for affordable housing is significant. Average house prices in Oadby and Wigston are above the regional average and lower quartile house prices are 8.6 times incomes (the third highest ratio in the HMA). Providing homes for those that cannot afford to buy is said to be one of the Council's key issues / challenges (see Local Plan Paragraph 2.6.1), one of its focus areas (Paragraph 2.6.2) and one of its priorities (Paragraph 6.3.2). It also features in the Plan's Spatial Objective 8.
- 1.15 As indicated above, the Borough's OAN for affordable housing is 143dpa in the period 2011 – 2031, or 139dpa in the period 2011 – 2036. Relative to demographic need, this is by far and away the greatest level of affordable housing need in the HMA.
- 1.16 So far as we can tell, the Council has not included within its evidence base full details of its affordable housing delivery for the period 2011 – 2017. However, based on the information contained within its Housing Implementation Strategy, it would appear that it has delivered just 98 affordable dwellings in the last 6 years, compared with an OAN for affordable housing of 858 dwellings. Some 760 households are, therefore, already in unsuitable accommodation and cannot afford or otherwise avail themselves of appropriate housing.
- 1.17 The Council has also not produced an affordable housing trajectory for the remainder of the Plan period (contrary to Paragraph 47 of the NPPF), or any other evidence detailing how many affordable homes it expects to deliver over the next 13 years or so. It is impossible to say, therefore, how far adrift of its affordable housing need the Borough will be by 2031, or 2036, although if the Plan's housing requirement is fixed, as proposed, at 148dpa, it is a fact that the Council will do no more than scratch the surface. That would be wholly unacceptable and completely contrary to Government policy on both plan-making and housing delivery.
- 1.18 In the light of the foregoing, it is particularly disturbing to note that the Council appears to have given its OAN for affordable housing no thought whatsoever. We can find no evidence of it having considered increasing its housing requirement as a means of addressing its affordable housing needs in full, or even attempting to identify an alternative level of provision that might not meet its needs in full but would make a substantially larger dent in the OAN than will happen if the Plan is adopted as drafted. This, again, is wholly unacceptable. Moreover, it means that the Council is unable to demonstrate that the Plan is positively prepared, justified and consistent with national planning policy. Accordingly, it cannot demonstrate that the Plan is sound.

Question 4 – Is the Local Plan sufficiently flexible to ensure delivery of sufficient housing to meet the OAN/housing requirement over the plan period?

- 1.19 As indicated above, we are firmly of the view that the Plan period should extend to 2036 and, accordingly, that the housing requirement should, as an absolute minimum, be set at 155dpa. On this basis, and even if

we assume for present purposes that the entirety of the Council's housing land supply is deliverable or developable, the Plan does not make sufficient provision even for its requirement to be met, let alone provide any flexibility to deal with changes in circumstances.

- 1.20 Without prejudice to that position, and assuming that the Plan period and requirement are fixed at 2031 and 148dpa respectively, the Plan still has no in-built flexibility.
- 1.21 The NPPF, at Paragraph 14, states that, for plan-making, the 'presumption' means that "*Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change*". Such flexibility is critical in the context of Paragraph 47, which requires authorities to "*boost significantly the supply of housing*", and the housing crisis which is very real and is having a range of significant adverse effects on large parts of the population. The Inspector will be aware that the Local Plans Expert Group recommended to Government that Local Plans should contain provisions for reserve sites with a capacity equivalent to 20% of the District's housing requirement to provide appropriate flexibility and ensure that a policy compliant level of housing supply can be maintained throughout the Plan period.
- 1.22 As the Inspector has noted, the 'theoretical capacity' set out in Document LP2/04 matches the housing need for the Borough up to 2031. The consequence of this is that, in order for the Council to meet its objectively-assessed needs, it will require all of its proposed allocations and those sites which the Council treats as 'commitments', to deliver the anticipated number of dwellings in the timescales forecast by the Council.
- 1.23 If one allocated site or 'commitment' under-delivers, or is delayed such that it does not provide the number of dwellings expected over the plan period, then the Council will fail to deliver the minimum number of homes required to satisfy its (HEDNA specified) housing needs. In the light of the provisions of the NPPF and the state of the housing market, that would be a perverse and completely unacceptable outcome. The Inspector and the Council have the ability to make changes now that will make the Plan more robust / resilient and capable of dealing with rapid changes in circumstance. Such changes in circumstance could include a landowner or developer encountering difficulties with an allocated site, or Leicester quantifying its unmet need and the HMA authorities agreeing that Oadby and Wigston should accommodate an element of that need. A case in point is the Council's proposed allocation of land to the west of Welford Road. Policy 1 of the Local Plan states that the site will deliver 50 dwellings. However, on 15 March 2018, the Council resolved to grant outline planning permission (subject to completion of a S.106 agreement) for up to 43 dwellings. This is 7 fewer than expected in the Plan. We therefore reiterate that changes should be made now to make the Plan more resilient and capable of responding to such rapid changes in circumstance.
- 1.24 The Council has stated in the Submission version of the Plan (at Paragraph 4.2.11) that it has built in a 'buffer' that would allow "*an additional number of new homes*" to be delivered "*up to the end of the Plan period 2031 [sic] or beyond*".
- 1.25 The Council states that these additional dwellings comprise:
- 40 dwellings within the settlement boundary of Kilby Bridge;
 - "*approximately*" 300 new dwellings on a potential Phase 3 of the Wigston Direction for Growth site; and
 - an assumed 70 windfall dwellings over the plan period.

- 1.26 The Council goes on to conclude that this “buffer” of circa 400 dwellings “would negate any potential delivery issues on allocated sites”.
- 1.27 We look briefly at each of these in turn.
- 1.28 While Policy 17 of the Local Plan would provide support for the development of up to 40 dwellings within the Kilby Bridge village envelope, the Council is not proposing to allocate land for development in the village and, so far as we can tell, has no evidence on the deliverability of specific sites. In addition, the support provided by Policy 17 comes with a range of caveats, including the need for developers to consider and, where necessary satisfy, flood risk sequential and exception tests. Given the way in which the Council is promoting the southern expansion of Wigston, there must surely also be questions to be answered in respect of coalescence. If the Wigston Direction of Growth expands as proposed, and Kilby Bridge expands on its northern side, the Borough’s ‘only rural settlement’ will be absorbed into the urban area. This cannot be right, particularly when there are alternative (less constrained and more sustainable) sites available for development. We return to that particular issue under Matter 6. Ultimately, there is nothing in the Plan which gives us any certainty that the 40 dwellings notionally earmarked for Kilby Bridge can or will be delivered.
- 1.29 The second component of the ‘buffer’ is a potential third phase of the Wigston Direction for Growth site. However, it is apparent that the Council is not looking to allocate Phase 3 in the Plan. Moreover, at Paragraph 4.2.12, the Council states:
- “Should evidence suggest a need for further development at the Wigston Direction for Growth area (Phase 3), it would be subject to appropriate testing, in particular, highway and transport infrastructure capacity, and liaison with the Borough Council and Leicestershire County Highways department. Any proposal would also be subject to the development being sensitive to the countryside areas that surround it and sustainable and appropriate in size and facility provision. This will be Plan led and will be considered through a future review of the Plan” (our emphasis).*
- 1.30 It is clear, therefore, that a third phase of development at the Direction for Growth site has not been subject to any feasibility testing, and so there is no evidence of it being able to make any kind of contribution to the housing needs of the Borough in the foreseeable future. Moreover, the Council clearly contemplates this land only being released for development through a review of the Plan. It cannot, therefore, assume that it is capable of addressing housing delivery issues that the Council encounters in the present Plan period.
- 1.31 If Kilby Bridge and Phase 3 of the Wigston Direction of Growth are ignored, as is necessary on the available evidence, this means that the Council is wholly reliant on windfalls for the flexibility that Paragraph 14 of the NPPF says is required to ensure that the Local Plan can adapt to rapid changes in circumstance. This cannot make for appropriate planning. Windfalls are, by definition, unplanned, unforeseen, unknown quantities. The Council has estimated that a certain number of windfalls developments will be delivered in the Plan period but it cannot say for sure that they will – it has no site specific information to evidence its assumption. In addition, the Council has asserted that its capacity for growth is limited (if not non-existent) beyond 2031 which suggests that it has exhausted its land supply. If this is right, where are the windfalls going to come from? Finally, and perhaps most importantly, for a Plan to have the ability to deal with changes in circumstances (e.g. address slippages in housing delivery), it needs to be able to call on specific, identified

and tested sites that it knows can be brought into the supply as and when required and that are capable of delivering housing quickly. This means sites that have been the subject of assessment and, very probably, are already in the hands of developers. Windfalls do not meet this definition.

- 1.32 Ultimately, the Plan has no in-built flexibility. The Council will only meet its 148dpa requirement if every single commitment and site that it is proposing to allocate delivers housing precisely as hoped. That, of course, is almost certainly not going to happen. For a start, local authorities are notoriously over-optimistic when it comes to estimating the time it takes to get from allocation, through land acquisition and planning application processes to actual delivery. These things tend to take longer to deal with than forecast and so delivery is often slower than anybody would like. However, in addition, it is rarely the case that each and every site that a Council identifies as being suitable for development ends up delivering housing as expected. There will always be some issue somewhere which impacts on deliverability. These issues must be anticipated and planned for in order for the Local Plan to be sound. And planning for such issues means allocating more land for development than, technically, is needed to satisfy the stated requirement. In our view, the Plan should be allocating sufficient land to meet at least the Borough's requirement (whatever this is deemed to be), plus at least 20%. As indicated elsewhere, our Client's land at Newton Lane could play a very positive role in this regard.

Issue 2 – Whether the Council will be able to demonstrate a five year housing land supply on adoption of the Local Plan

Question 1 – When calculating the five year housing land supply, is it appropriate in the context of Oadby and Wigston to (a) apply a 5% buffer and (b) only apply the buffer to the LP base requirement and not any shortfall?

- 1.33 As a preliminary point, we note that the Council intends to publish updated monitoring documents in early April and so before the Hearing Sessions but after the deadline for the submission of Hearing Statements. This is most unhelpful. Participants will need to be given the opportunity to consider and comment on this additional material as appropriate.
- 1.34 The short answer to Question 1(a) is 'no'. Paragraph 47 of the NPPF directs that a 20% buffer should be applied where "there has been a record of persistent under delivery". There has been persistent under-delivery in this Borough, even when delivery is tested against the 148dpa requirement that the Council is proposing (which we say is too low). The Council's data on completions is as follows:

Delivery Year	Target	Dwellings Delivered
2011-2012	148	79
2012-2013	148	44
2013-2014	148	47
2014-2015	148	116
2015-2016	148	117
2016-2017	148	175
Total	888	578

- 1.35 It is evident from Table 1 that the number of dwellings delivered has only exceeded the proposed target of 148 in one monitoring year out of the previous six. In our view, this can only be described as ‘persistent under-delivery’. That being so, we conclude that a 20% buffer must be applied. We note also that the Council is expecting to have delivered only 108 dwellings in the current monitoring year (2017 – 2018). If that estimate is accurate, this will make 6 out of the last 7 years in which the Council has failed to satisfy its requirement.
- 1.36 The short answer to Question 1(b) is also ‘no’. The buffer should be applied to the base requirement plus any shortfall accumulated since the start of the plan period. To do anything else would mean that the buffer is not being applied to the Council’s full requirement in accordance with Paragraph 47 of the NPPF (the requirement is any element of the requirement not satisfied in the plan-period to-date (the shortfall) plus the requirement for the next 5 years). The shortfall is not ignored for the purposes of applying the buffer.

Question 2 – Is the Council’s preferred approach of meeting the existing shortfall over the remaining plan period (the Liverpool approach) rather than over 5 years (the Sedgefield approach) justified?

- 1.37 The Liverpool approach is not sound. There is no support for such an approach in policy or guidance. The NPPF is clear that local authorities should boost significantly the supply of housing and the NPPG provides that:

“Local planning authorities should aim to deal with any undersupply within the first 5 years of the plan period where possible. Where this cannot be met in the first 5 years, local planning authorities will need to work with neighbouring authorities under the duty to cooperate”.

- 1.38 There is no contemplation in the NPPF or the NPPG of shortfalls being addressed in the remainder of the Plan period, even in circumstances where the shortfall cannot be addressed in the next 5 years.
- 1.39 In addition, there is plainly no market or land availability justification for adopting anything other than the Sedgefield approach to assessing housing land supply. Delivery rates have only been suppressed in this Borough because of the approach that the Council has taken to planning for housing – not because the Borough is short of developable land or because the market cannot deliver housing at substantially higher rates than it has in the past.
- 1.40 As the Council has itself noted in its responses to the Inspector’s Initial Questions, the Inspector in the Cottage Farm case concluded that the Sedgefield approach should apply in the Borough on the basis that the “Core Strategy is based on a straight line trajectory of supply set at 90 dwellings per annum”. The Inspector concluded that he did not see this “as justifying spreading the shortfall over an extended period”. Given that the Local Plan, as drafted, assumes a similar ‘straight line’ trajectory of 148 dwellings per annum, then it follows that the Cottage Farm Inspector’s conclusions ought to continue to apply here.
- 1.41 Jelson is satisfied, therefore, that the Borough’s housing land supply should be calculated applying the Sedgefield method.
- 1.42 Having regard to our responses to Question 1 and Question 2, we conclude that the five-year target ought to be calculated as follows (again, without prejudice to our conclusion that the annual requirement should be higher than 148dpa):

Table 2: Five Year Target (2017 – 2022) (based on HIS 2017)	
Base Requirement (148 x 5)	740
+ Shortfall (310 dwellings)	1,050
+ 20 % Buffer (210 dwellings)	1,260
Total Five Year Target	1,260 dwellings

- 1.43 Although the Council has not yet published its latest monitoring documents, the Housing Trajectory at Figure 1 of the Submission Version of the Local Plan indicates that 108 dwellings might be provided in the monitoring year 2017 to 2018. The Council relies on that figure in its response on five-year supply matters to the Inspector's Initial Question 7.
- 1.44 If 108 dwellings have been delivered in the current monitoring year, then that would represent a further under-delivery against the proposed housing requirement. Indeed, delivery of 108 dwellings would mean that 686 dwellings have been delivered against a minimum requirement of 1,036, generating a shortfall of 350 dwellings.
- 1.45 In that scenario, then following the methodology in Table 2 above would generate the following requirement.

Table 3: Five Year Target 2018 – 2023 (assuming 108 dwellings constructed in 2017 – 2018)	
Base Requirement (148 x 5)	740
+ Shortfall (350 dwellings)	1,090
+ 20 % Buffer (218 dwellings)	1,308
Total Five Year Target	1,308 dwellings

- 1.46 The Council states, in its responses to the Inspector's Initial Questions, that it expects, upon adoption of the Local Plan, to have a supply of either 1,239 or 1,251 dwellings (depending on whether the calculation assumes a base date of April or October 2018). Either way, and irrespective of whether one applies a requirement of 148, 155 or a higher figure, this quantum of land will not be sufficient to give the Council a five-year supply of deliverable housing sites upon adoption of the Plan. The Inspector will also note that, in our response to Matter 6, we have concluded that a number of the Council's proposed allocations are not

deliverable (when tested against the NPPF definition of deliverable). Consequently, the supply of dwellings for the five year period will, in reality, be smaller than the Council states, thereby exacerbating the extent to which it is unable to demonstrate a five-year supply. The Plan is therefore unsound.

Question 3 – Does the Local Plan clearly express how five-year housing land supply will be calculated?

- 1.47 The Local Plan, as drafted, is largely silent on five-year supply issues. We note, in particular, that in Section 4 and Table 1, the Council says nothing about its failure to deliver the number of dwellings required since 2011. As a consequence, it also says nothing about how the shortfall is to be addressed.
- 1.48 Having regard to our responses to Questions 1 and 2, we conclude that the Local Plan needs to be amended to (i) provide a robust and policy compliant assessment of the Borough's land supply as at an appropriate (and as up to date as possible) base date; (ii) include a strategy for dealing with the shortfall that has amassed to date as quickly as possible and certainly in the next 5 years; and (iii) provides realistic and robust evidence of how a five-year supply is to be maintained on a rolling basis through the Plan period, including by introducing additional site allocations to provide a suitable degree of flexibility / resilience.

Question 4 – Is the Local Plan sufficiently flexible to ensure delivery of, and to maintain, a five year housing land supply?

- 1.49 In order to ensure that local authorities boost significantly the supply of housing, the NPPF requires local authorities to do various things including (i) using their Local Plan to meet the HMAs' OANs for market and affordable housing (in full, so far as is consistent with the other policies in the Framework); (ii) identify and update annually a supply of specific deliverable housing sites (including provision for an appropriate buffer); (iii) illustrate the expected rate of delivery for market and affordable housing through housing trajectories; and iv) set out a housing implementation strategy for the full range of housing describing how they will maintain delivery of a five-year supply of housing land to meet their housing target.
- 1.50 The Council has no such strategy and, for the reasons explained above we do not believe that the Plan will give the Council a five-year supply of deliverable housing sites at the point of adoption (even if the Inspector decides that the housing requirement should be set at 148dpa). We have also explained above how the Plan has no in-built flexibility to ensure that (i) its overall housing requirement is met and (ii) it maintains a rolling five-year supply through the Plan period. The Plan is, therefore, in direct conflict with key provisions of the NPPF and is unsound.
- 1.51 These critical deficiencies can only be addressed through the identification and allocation of additional housing sites. And, as indicated elsewhere, these should be suitable, available now, and achievable now in order to make the Plan suitably robust. That will almost certainly mean allocating land, such as our client's land, that has been the subject of assessment and is already in the hands of a developer.

Question 5 – Do the housing delivery monitoring indicators contain a timely trigger that will ensure measures are put in place promptly should the Local Plan not be effective in maintaining a five-year housing land supply?

- 1.52 In Chapter 12 of the Local Plan, the Council sets out its Monitoring Framework. This identifies the approach to monitoring and sets out 'key indicators' against which the performance of the Local Plan will be measured.

However, there is no reference to maintaining a five-year supply in the Monitoring Framework. As such, there is no trigger for taking corrective action if the Council cannot demonstrate a five-year supply of housing.

- 1.53 At Paragraph 1.5.6 of the Local Plan, the Council describes those circumstances in which a Review of the Plan will be undertaken. The first circumstance is where *"through the annual monitoring of the targets set out in Chapter 12 of this Plan, the Plan is not delivering its targets on a consistent ongoing basis."* However, there is no definition of *"consistent, ongoing basis"* and so it is not at all clear under what circumstances (i.e. over what period would there need to be less than a five-year supply) the Council would conclude that a Review of the Plan is required.
- 1.54 As indicated above, the Plan does not contain a strategy for maintaining a five-year supply of deliverable housing sites on a rolling basis and even if the words were in place, it hasn't allocated enough land to give the Plan the flexibility that it needs on an on-going basis. The Plan is, therefore, not positively prepared, justified, effective or consistent with national planning policy.