



Call for Sites and Housing Allocations

Advice Paper

The advantages of including housing site allocations in a neighbourhood plan

1. The final neighbourhood plan will be more comprehensive, deal more directly with a critical issue that matters to people – e.g. housing and homes – and will therefore engage more people and have greater status in the minds of local people. To leave housing site allocations to the relevant local plan can often diminish the effectiveness of a neighbourhood plan and may lead to disaffection across the parish e.g. what is the point of a neighbourhood plan that cannot control or encourage the right type of housing in the right places?
2. A neighbourhood-level allocations process, as overseen by a parish council, is closer to its community than one run by a borough or district council and will allow a greater degree of transparency and local autonomy.
3. A neighbourhood plan can be more responsive to local opinion on the details of what happens on each housing site and what benefits could be sought. For example, housing sites can be linked to community contributions and benefits. The referendum at the end of the process will focus minds on getting the necessary community support for each option.
4. A neighbourhood plan can test housing options earlier, and quickly reconfigure where necessary, allowing a greater degree of agreement with the community over sites and, therefore, likelihood of delivery. Again, all with an awareness about the referendum at the end of the process.
5. A neighbourhood plan with allocations can develop a spatial strategy for the parish, as supported by evidence-gathering, that distributes new homes in a more equitable way, with no one part of a parish necessarily taking all the development burden. While a local plan will develop a similar spatial strategy, it does so for the whole borough or district, and this will not necessarily benefit the parish. Housing allocations in a local plan could put homes in a village all in one place.
6. A parish with a neighbourhood plan that includes housing allocations is in a much stronger position to reject unwanted or speculative development in inappropriate locations. This is especially the case if the relevant local plan is out of date or fails to carry a five year housing land supply.

The disadvantages of including housing site allocations in a neighbourhood plan

1. The process will include more work for steering group members, with additional processes such as Strategic Environmental Assessment (SEA) and formal site selection being required.
2. There will be difficult choices to be made. This means that members of the steering group and the parish council are more directly in "front line" of possible hostility and opposition from residents who do not want development near them. The parish council needs to be prepared to defend unpopular decisions.
3. There is also the possibility of landowners and/or developers who miss out on a site allocation being unhappy. They are likely to direct their protests at the parish and steering group, not the local planning authority. Again, the parish council needs to be prepared to defend unpopular decisions.
4. The obligatory supporting documents required at Reg. 16 submission stage (Basic Conditions Statement and Consultation Statement) are likely to be longer and more complex to prepare. The Consultation Statement presents all comments received on the draft plan and with site allocations included in the draft plan, a greater number of responses is likely to be received. These will all need processing and ultimately responding to through the formal process.
5. The examination (that follows the submission stage but precedes referendum) is likely to be more complex due to the site allocations being subject to challenge at this stage. Rather than a straightforward examiner's report, a local hearing or inquiry-format examination may be necessary to resolve controversial housing matters before referendum.
6. It will be important to seek agreement that the local plan will not make further allocations in the parish and therefore undermine confidence in the neighbourhood plan being the only place to find housing allocations for the parish.
7. There may be increased time pressure on a neighbourhood plan. The reason for this is that the relevant local plan may be relying upon the neighbourhood plan to deliver a proportion of the district or borough's housing total. If the local plan goes to inspection without the neighbourhood plan at least reaching submission stage, then the local plan may be considered vulnerable. So, the process ahead needs to be quick yet still be robust.

Before housing allocations can be included in a neighbourhood plan, a call-for-sites process must be run to identify land for development. Here are the advantages/disadvantages of this aspect.

The advantages of running a call-for-sites process

1. The parish will be in control of the process and timeline, and not reliant upon external processes and timelines e.g. equivalent processes run by the local planning authority.
2. A neighbourhood-level call-for-sites can set criteria specific to the needs of the parish unlike a borough or district wide call-for-sites that will only have general criteria.
3. The process is more likely to identify small-scale sites that may not be submitted to a borough-wide call-for-sites process. This was certainly the case across the South Downs National Park Authority (SDNPA) when neighbourhood plan groups were able to identify sites of 6-10 units that the national park had not been offered in their earlier local plan call-for-sites.
4. Even if no actions are taken by the parish in respect of the call-for-sites results, the exercise will reveal where developer interest lies and give the parish and community a better understanding of landowner intentions and the opportunities they present.

The disadvantages of running a call-for-sites process

1. The parish could be accused by local people of encouraging development pressure in areas where previously there were none. The process needs careful management to ensure there is no misunderstanding about the aims and outcomes of the process.
2. More work will be required by the steering group to run the process, review the results, and manage public information/communications and expectations.
3. There will be a need for a clear audit trail and recording of all work from the outset to help defend future decisions.
4. The need for an agreement with the local planning authority that if the parish runs a call-for-sites at a neighbourhood level, the LPA will not ask for sites to be nominated within the parish if/when they run the district or borough-wide version. A situation where there are two call-for-site processes, one at neighbourhood and another at local level, should be avoided.