

Matter 8 - Housing Land Supply

1. ***Is it clear to decision makers, developers and the community, what action, as referred to in Policy CP4 part 3, the Council would take to ensure that adequate delivery rates are maintained?***
 - 1.1. The HBF does not consider that it is clear within Policy CP4 Part 3 what actions that Council will take to ensure that adequate delivery rates are maintained.
2. ***Is there compelling evidence that windfall sites will provide a reliable source of supply in accordance with paragraph 70 of the NPPF?***
 - 2.1. The Housing Topic Paper provides details on the small site windfall completions over the last 5 years, it highlights that an average of 68 dwellings have been provided each year. The Council note the changes to Permitted Development rights and suggest that these additional sources of supply could potential provide an additional source of windfall supply. The Council suggests that the 70dpa windfall allowance is based on the historic small sites trend, plus an additional allowance of 10 units for any larger windfall sites and a deduction of 10 units to allow for possible demolitions. Within this Topic Paper the Council propose not to include a windfall allowance for the first two years of the plan to avoid double counting.
3. ***The Council's windfall methodology analyses sites below 5 dwellings. What is the justification for using this threshold? What evidence is there of larger windfall sites coming forward and contributing to the supply?***
 - 3.1. The HBF assumes that the Council have used 5 dwellings as the threshold for windfall, as sites of 5 or more dwellings should have been considered within the Strategic Housing Land Availability Assessment (SHLAA) as per the PPG¹. However, the Topic Paper provides limited information as to why this threshold was used.
 - 3.2. The Housing Topic Paper suggests that larger windfall sites have come forward as well they suggest at an average of 142dwellings per annum over the period 2017 to 2022. However, no detail is provided in relation to these sites, in terms of how many sites or how large they were or whether they occurred on a regular basis, or due to specific circumstances.
4. ***The housing trajectory makes allowance for windfalls from 2021/22. In the first 3 years of the supply, is there a risk of double counting sites which already have planning permission and are already included in the supply calculations?***
 - 4.1. The HBF considers that the Housing Trajectory should be updated and that it should not include windfall developments within the first three years to avoid potential for double counting of developments.
5. ***Do the Council's assumptions for a 15% slippage in the delivery of housing from sites with planning permission and a 5% lapse rate for sites under construction make a reasonable allowance for the non-implementation of permissions?***
 - 5.1. The HBF considers that it is appropriate for the Council to include an assumption is relation to slippage and lapse rates. It is not unusual for there to be some permissions that do not come forward as expected due to changing circumstances this may lead to permissions and developments being amended, or coming forward at a different rate than expected, or even for proposals for the site to change completely.
6. ***What is the basis for the assumption that 10 demolitions will occur each year?***

¹ PPG ID: 3-009-20190722

- 6.1. The Housing Topic Paper suggests an average of 7.8 dwellings have been demolished on average over the last 5 years.
7. ***How have the site capacities for sites without planning permission been determined?***
- 7.1. The HBF considers that this is a question for the Council. However, the HBF would expect the Council to have evidence on any discussions that have taken place or documentation that has been provided in order for the Council to make these assumptions in relation to capacity.
8. ***The housing trajectory assumes 90 dwellings will come from the reoccupation of long-term empty properties over the period 2021/22 to 2025/26. What evidence is there to support this? Why has an allowance only been made for a 5-year period?***
- 8.1. The Housing Topic Paper identifies a decrease in the number of empty properties in the Borough over the period 2015/16 to 2020/21. They have also identified that they are updating their Empty Properties Strategy. The HBF are uncertain about the need to include an allowance for the reoccupation of Empty Homes, there are a lot of uncertainties around Empty Homes, and whilst it is possible to try to address this issue, changing economic circumstances are likely to have more of an influence on the numbers of Empty Homes than the Council's Empty Properties Team.
9. ***What assumptions have been made to inform the trajectory for the delivery of housing sites, in terms of lead in times for grant of full planning permission, outline and reserved matters, and conditions discharge; site opening up and preparation; dwelling build out rates; phasing; and number of sales outlets?***
- 9.1. The HBF considers that this is a question for the Council. However, the HBF would expect the Council to have worked closely with the developers of the sites to ensure that their assumptions are evidenced.
10. ***Is the 5% overall plan buffer sufficient to provide flexibility and contingency should sites be delayed and not come forward in the timeframe envisaged?***
- 10.1. The HBF considers that the Council should ensure that their housing supply provides flexibility and has the capacity and flexibility to deal with any changes in circumstances.
11. ***Overall does the Plan allocate sufficient land to ensure the housing requirement of the Borough will be met over Plan period, in particular from 2029 onwards?***
- 11.1. The Housing Topic Paper suggests that there is a potential housing land supply of 9,192 dwellings. This includes 3,492 dwellings on committed sites, 4,579 dwellings on sites in the SHLAA and 1,120 dwellings on potential windfall sites. However, the Housing Trajectory in the Local Plan appears to provide a much lower level of supply with 7,323 dwellings identified. It also shows the housing land supply dropping from 2029 onwards. The Local Plan housing requirement of 447 dpa would create an overall housing need of 7,152 dwellings over the 16-year period 2021 to 2037. The HBF considers that it is important that the Council ensure that there is sufficient land allocated and deliverable or developable to meet the Local Plan housing requirements, and to ensure that there is a rolling five-year housing land supply.
12. ***In accordance with paragraph 69(a) of the NPPF, would at least 10% of the housing requirement be accommodated on sites no larger than 1ha? The Housing Topic Paper indicates that approximately 6% of the committed sites and allocations are below 1 hectare in size. What evidence is there that the remaining 4% will be achieved through windfalls or from sites on the brownfield register?***
- 12.1. The HBF considers that this is a question for the Council.

Five-year housing land supply

13. ***The Council is seeking to confirm the existence of a five-year supply as part of the plan making process. Has the preparation of the plan been consistent with paragraph 75a) of the Framework?***
- 13.1. The HBF considers that this is a question for the Council.
14. ***Has the appropriate buffer been applied in accordance with paragraph 74 of the Framework?***
- 14.1. The HBF considers that if the Council wishes to demonstrate a five-year supply of deliverable sites through the adoption of the Plan then they need to be able to demonstrate a 10% buffer.
15. ***Would the Council be able to demonstrate a 5-year supply of deliverable housing sites on adoption of the Plan and a rolling 5-year supply throughout the Plan period?***
- 15.1. The HBF considers that this is a question for the Council.