

## **M8. Housing Land Supply**

*Whether the requirement for 24,852 new homes between 2016 and 2035 (1,308 dwellings per year) is justified was considered under matter 2. This matter considers the ways in which identified housing needs are proposed to be met in the Plan, other than the proposed urban extensions to Durham city which were considered under matter 5.*

*The Council's response to PQ8 (housing requirement and supply), and the Five Year Housing Land Supply Position Statement 2019 published on 22 August 2019 [DCC2] are relevant to this matter.*

### **a) Commitments**

***Is the assumption in Table 2 in the Plan that 15,946 homes will be provided on "commitments as at 30 September 2018" justified?***

Table 2 identifies 15,946 dwellings as part of the potential supply, as commitments that were in place as at 30<sup>th</sup> September 2018. However, paragraph 24 of the Housing Need and Residual for Allocation Evidence Paper states that *'it is unlikely that all of these will come forward during the Plan period for a variety of reasons such as abnormal costs, including land contamination, or a lack of house builder interest. As the existing commitments make up almost two thirds of the LHN the impact of non-delivery of some of these developments on the ability to meet the Plan's LHN has the potential to be significant'*. The Paper then goes on to discuss the level of permissions that have lapsed previously. It suggests that from 2011/12 to 2014/15 an average of 17% of the dwellings granted permission have lapsed. It is not clear why the lapse rate has only been considered over this period or for such a short time period.

Table 2 of the Local Plan does also include a lapse rate; however, this is only a 10% discount, the Paper suggests that the 10% has been applied due to a spike created by two large sites which lapsed. This again highlights the issue with only utilising a small period of time in which to consider the lapse rate, it is also not clear why the reduction lead to a figure of 10% for the lapse rate. In fact, an adjustment removing the entirety of the two large sites (as set out in Table 1 below) shows that it could have been more appropriate, based on the evidence the Council utilised, for a lapse rate of 12%. However, the HBF would continue to recommend a longer period should have been considered including more recent years. The HBF consider that given the Plan is heavily dependent on the committed supply, that it is particularly important the effect of lapses or changes in permissions are fully considered. It is important that the level of commitments included within the supply is appropriate, including the consideration of a lapse rate, to ensure that a suitable level and of allocations are made across the market area. In conclusion, the HBF do not consider that the commitments and lapse rate are justified.

<b>Year</b>	<b>Dwellings granted</b>	<b>Dwellings lapsed</b>	<b>% dwellings</b>
2011/12	1,741	162	9%

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2012/13	2,189	769 / 268 <sup>1</sup>	35% / 12%
2013/14	3,553	544	15%
2014/15	2,369	229	10%
<b>Total</b>	<b>9,852</b>	<b>1,704 / 1,203</b>	<b>17% / 12%</b>

**b) Windfalls and development on unallocated sites in built up areas (policy 6)**  
***Is policy 6 relating to development on unallocated sites in the built up area justified and will it be effective in encouraging housing development in locations that are consistent with the Plan's spatial strategy and national policy?***

***Is the windfall allowance of 80 dwellings per year 2021 to 2035 on sites under 0.4 hectares (12 dwellings) justified and consistent with national policy? Should an allowance also be made for windfalls on sites of over 0.4 hectares?***

Paragraph 4.22 of the Plan states that small sites under 0.4ha have historically made a contribution to past housing delivery (an average of 117 houses per annum for the past five years). It goes on to state that it is expected that with the Plan in place the number of windfalls will reduce, therefore it is considered that an allowance of 80 per annum on small sites would be appropriate.

NPPF (2019) is very clear that where an allowance is to be made for windfall sites as part of anticipated supply, there should be compelling evidence that they will provide a reliable source of supply. The Council will need to ensure that they have this compelling evidence to support their 80dpa figure and ensure that it is realistic having regard to the SHLAA, historic windfall, and expected future trends. The HBF consider that whilst the 80dpa may at first appear reasonable there is potential for the allocation of housing, combined with a more detailed assessment of housing land availability to significantly reduce the level of windfall development that comes forward. Therefore, a greater reduction or removal of the windfall allowance would be appropriate. It is considered that if a windfall allowance is retained that the Council monitor the provision that windfall development is making to the delivery of homes in the Borough to ensure that the supply remains and is continuing to provide additional flexibility and the opportunity to boost housing supply.

The HBF support the Council in not including windfalls within the first three years to reflect the fact that most windfalls that could have contributed to this period will already have planning permission.

**c) Empty homes and demolitions**

***Should the Plan make clear that changes in the number of empty homes and the number of homes lost through demolitions and conversions will be taken into account in annual monitoring against the net requirement for 1,308 homes per year?***

The HBF consider that it should be made clear how the housing delivery will be monitored, this could include further detail as to how the net figure will be calculated.

It is noted that the Council have stated that it is difficult to do anything more than estimate the future impact on housing supply. Due to lack of robust evidence that empty homes will

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<sup>1</sup> Removing the 2 large sites of 243 and 258 units

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be brought back in to use, the HBF consider that this should only provide flexibility to supply and not be included within the supply at this stage

**d) Student housing**

***Is the assumption in paragraph 4.25 of the Plan that new student accommodation, including that proposed in policy 16.2 (Table 9 allocations PBSA1 to PBSA6), will make no contribution towards meeting the need for 1,308 homes per year justified and consistent with national policy and guidance?***

The HBF do not wish to comment on this question at this time.

**e) Methodology for selecting allocations**

***Was the approach to selecting housing allocations, summarised in paragraph 4.84 of the Plan, justified and consistent with national policy and guidance? In particular, did the approach take account of site availability, likely economic viability, suitability, and relevant opportunities and constraints (including in relation to the character and appearance of the area; heritage assets; open space, sport and recreational buildings and land; accessibility by sustainable modes of transport; highway safety; flood risk; and social infrastructure)?***

The HBF do not wish to comment on this question at this time.

**f) Housing allocations**

***Are the housing allocations proposed in policy 4 (Table 7) and shown on the policies map justified? In particular, are they in suitable locations in the context of the Plan's vision, objectives and overall spatial strategy, and is there a reasonable prospect that they will be available and could be viably developed at the point envisaged? Are the site specific requirements set out in Table 7 justified?***

- ***Durham City allocations (other than Sniperley Park and Sherburn Road)***
- ***Central Durham allocations***
- ***North West Durham allocations***
- ***Mid Durham allocations***
- ***South Durham allocations***
- ***East Durham allocations***
- ***West Durham allocations***

The HBF do not wish to comment on this question at this time.

**g) Small and medium sized sites**

***Will the Plan be effective in helping to ensure that at least 10% of the housing requirement of 1,308 dwellings per year is met on sites no larger than one hectare as required by national policy?***

The HBF do not wish to comment on this question at this time.

**h) Five year supply and housing trajectory**

***The Council's evidence indicates that on 1 April 2019 there was a deliverable supply of 8,745 dwellings compared to a five year requirement of 6,867 dwellings<sup>2</sup>. Is that evidence adequate and proportionate such that the figure is justified?***

***Will the Plan be effective in ensuring that there will be a supply of specific deliverable sites sufficient to meet an appropriately calculated five year requirement throughout the Plan period?***

***Does the housing trajectory contained in the Plan (Figure 3) effectively illustrate the expected rate of housing delivery over the Plan period?***

PPG sets out how an authority can demonstrate a five-year supply of deliverable housing site, NPPF provides a definition of deliverable. The Council's Response to the Inspector's Preliminary Questions and the Five Year Housing Land Supply Position Statement 2019 sets out the Council's evidence for their five-year housing land supply. The HBF do not wish to comment on individual sites but would recommend the Council ensure that they have the evidence necessary to demonstrate their supply is appropriate.

The HBF would also recommend that the Council ensure there are appropriate monitoring mechanisms in place to ensure that a five-year supply is provided and maintained throughout the Plan period. There HBF consider there should also be clear actions in place to ensure that the Council can work with developers to deliver the homes needed.

#### **i) Overall housing land supply**

***Overall, does the Plan identify a sufficient supply and mix of sites and contain effective policies to ensure that identified needs for housing over the Plan period can be met?***

Policy 4: Housing Allocations identifies allocations for 5,390 homes, Table 2 identifies a residual need for allocation of 5,323 homes. This suggests that the current allocations only provide a very small level of flexibility, of 67 homes. This small level of flexibility in supply is of particular concern within Durham due to our concerns in relation to the viability and deliverability of the supply. The HBF would always recommend that the Council provide additional flexibility in the supply, to allow for the non-delivery of sites and ensure that the housing requirement is met.

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<sup>2</sup> Table 6 in the Council's Five Year Housing Land Supply Position Statement 2019 [DCC2]. The supply of 8,745 dwellings are those that the Council considers are "deliverable" from an overall supply of sites with planning permission on 1 April 2019 with total capacity for 17,385 dwellings.