

Matter 17: The Supply and Delivery of Housing Land

Issue-Whether the approach towards the supply and delivery of housing land is justified, effective and consistent with national policy.

Relevant policy: H3PU

17.1 What is the estimated total supply of new housing in the plan period 2021-2038 and how does this compare with the requirement?

1. The Local Plan Appendix E suggests that there is a total supply of 4,881 dwellings for the period 2021/22 to 2037/38. Policy H2PU sets a housing requirement of a minimum of 2,482 dwellings.

17.2 What is the estimated total supply in the plan period from:

a) Completions since 31 March 2021

b) Sites under-construction

c) Planning permissions

d) Proposed allocations

e) Windfall sites

2. The Local Plan Appendix E has a base date of 31st March 2021, but Table 2 sets out the supply as considered by the Council.

17.3 What are the assumptions about the scale and timing of supply and annual rates of delivery from these various sources? Are these realistic? How do they compare to previous rates?

3. Table 1 of the Local Plan Appendix E sets out the assumptions that the Council has made in relation to the scale and timing of the housing land supply, and the annual rates of delivery. The HBF has assumed that the Council has and will work closely with developers to ensure that the assumptions are realistic, and appropriate for each site.

17.4 How has flexibility been provided in terms of the housing land supply? Are there other potential sources of supply not specifically identified? Can this be specified?

4. The HBF considers that this is a question for the Council.

17.5 In overall terms, would the Local Plan realistically deliver the number of houses required over the Plan period?

5. The HBF does not wish to comment upon the acceptability or otherwise of individual sites. However, the HBF considers it is important that all the sites contained within the plan are deliverable over the plan period and planned to an appropriate strategy. The HBF would expect the Council to have the evidence to support the proposed delivery of these sites.

17.6 Has there been persistent under delivery of housing? In terms of a buffer for a five-year supply of housing sites, should this be 5% or 20% in relation to para 47 of the NPPF?

6. The NPPF¹ makes it clear that a buffer is required as part of the supply of specific deliverable sites, the 5% requirement is the minimum requirement and applies where the Council is not wishing to demonstrate a five-year supply of deliverable sites through a recently adopted plan (where a 10% buffer would apply) and there has not been a significant under delivery of housing over the previous three years (where a 20% buffer would apply). The NPPF² states that under delivery will be measured against the Housing Delivery Test (HDT), where this indicates that delivery was below 85% of the housing requirement. The HDT score for Copeland in 2021 was 932%. Therefore, the 20% buffer does not apply.

17.7 How would any shortfall since 2021 be dealt with?

7. The PPG³ states that to ensure that there is a realistic prospect of achieving the planned level of housing supply, the local planning authority should always add an appropriate buffer applied to the requirement in the first five years (including any shortfall) (the Sedgfield approach). Therefore, the HBF considers that the Council should ensure that they deal with any shortfall within the five-year supply. The Council identify within the five-year housing land supply document that 144 net additional dwellings have been provided in the year 2021/22, this is 2 dwellings less than the proposed housing requirement of 146dpa, and is likely to have a minimal difference to the calculation of the five-year housing land supply.

17.8 What would the requirement be for a five-year supply including a buffer and accommodating any shortfall since 2021?

8. Using the proposed housing requirement of 146dpa, incorporating the shortfall of 2 dwellings and the 5% buffer, the five-year supply requirement would be 769 dwellings⁴.

17.9 Would the Local Plan realistically provide for a five-year supply on adoption? Will a five-year supply be maintained?

9. The HBF has not scrutinised the housing land supply and so is not in a position to comment as to whether the Local Plan would provide a five-year supply on adoption.

17.10 Is Policy SP H3PU justified, effective and consistent with national policy?

1. This policy sets out what the Council will do if housing development is not being delivered as anticipated. The HBF is not convinced that most of the content of this policy, is necessary to be policy, it reads much more as a statement of intent than a policy.
2. The policy also states that where housing delivery has exceeded expectations within a particular tier of the settlement hierarchy the Council will consider carrying a review of the Plan. The HBF does not consider that this is appropriate and considers that additional housing development should continue to be supported once the housing requirement figures have been met for the lower tiers of the settlement hierarchy, this would be in line with the NPPF⁵ which seeks to boost housing supply.

¹ Paragraph 74 of the NPPF 2021

² Footnote 41 of the NPPF 2021

³ PPG ID: 68-022-20190722 & ID: 68-031-20190722

⁴ $((146 \times 5) + 2) + (732 \times 0.05)$

⁵ NPPF 2021 Paragraph 60

3. The policy also suggests that in order to plan positively the plan will provide a supply of housing sites, which will provide a minimum of 3,400 dwellings over the plan period (average of 200dpa). The HBF would generally support a level of housing land supply which would identify a sufficient number of sites to meet the housing requirement plus an additional 20%, to create flexibility and choice within the range of sites, and would help to ensure that the housing requirement can be met. However, as the HBF considers that the housing requirement is likely to be higher than the figure currently proposed, this may also mean that the level of supply also has to increase proportionately.