

**Examination of the East Lindsey Core Strategy and the East Lindsey Settlement Proposals Development Plan Document (DPD)**

**Inspectors' matters, issues and questions (MIQs)**

**Stage 1 – Core Strategy**

26 May 2017

*Note: The MIQs for Stage 2 relating primarily to the Settlement Proposals Development Plan Document and 5 year supply of housing will be made available separately. Some cross-cutting issues relating to both plans will be considered in Stage 1.*

*Abbreviations:*

*ADM – additional minor modification proposed by the Council*

*CS – Core Strategy*

*Framework – National Planning Policy Framework*

*Regulations – The Town and Country Planning (Local Planning) (England) Regulations 2012*

***The Council` s answers are in italics with any suggested modifications in red italics***

**Matter 8 – Housing supply, including the 5 year supply of deliverable housing sites (Policies SP3 and the section on Housing Growth and the location of inland Growth)**

*Context: Table A of the CS sets out the overall position regarding the delivery of housing growth. The Housing Topic Paper sets out the Council's position on 5 year supply.*

**Main issues: Will the plans help deliver the requirement/target of 7768 homes? Is this target realistic and achievable? What should be the 5 year supply requirement?**

Overall supply questions

1. Is the total predicted supply intended to be 8336 plus 1935 (if windfalls are included) = **10721**? (CS Table A)

*The total predicated supply will be 8336 homes over the plan period. Windfalls are unpredictable and every time the Council produces a 5 year supply calculation this is reviewed to see whether it is still applicable. The Council would suggest two modifications for clarity by adding onto the end of paragraph 30 on page 28 a sentence which would read*

*The Council will keep the allowance for windfall development within the 5 year supply under yearly review.*

*And by adding in Table A in the left hand column where it describes the total so it reads as follows;*

*Total – This includes a 7.3% buffer against the housing target and is the predicted supply of housing.*

2. Will the policies in the plan ensure that the housing requirement of **7768** can be met? Is the supply from the following sources justified (CS Table A as summarised below)? Are these sites all deliverable or developable? Have any of the planning permissions for these commitments now expired or been approved for less dwellings? Are the commitment sites listed anywhere? Should any 'lapse rate' be applied? Are numbers for the housing allocations based on appropriate density assumptions?

*At the present time there have been no expiries of major commitments. Of the two approvals on the allocated sites which have been made since the Plan was submitted for examination one was granted with one house more than set out in the Plan and the other one was exactly as predicted. The Council believes that the housing supply from the sources in Table A is justified, all the site owners/developers have confirmed that they are going to bring the allocated sites forward. All the proposed allocated sites have been out for rounds of consultation with statutory consultees and those sites which had constraints on them were not brought forward into the Plan.*

*The density rates were worked out by looking at past completions in each tier of the settlement pattern and then applying an average. Each site was assessed to see if there were any constraints on it that would affect the density and the amount of development was discounted down accordingly. The amount of suggested development on each site also reflected any consultation response from developers and landowners.*

*With regard to the existing commitments the Council only puts into the 5 year supply sites where the owners/agents/developers have been contacted and they have said the site is being brought forward in 5 years. The Council visits sites, checks with building control and places a significant amount of resource into this work. Commitments are published on the Council`s website twice a year in a position statement showing the details of how the Council has contacted everyone. Given the high number of windfall sites coming forward and the relatively low number of expiries the Council does not see the need to apply a lapse rate. For clarity a note could be added to the base of Table A which states that*

*Details of existing planning commitments can be found on the Council`s website at [www.e-lindsey.gov.uk](http://www.e-lindsey.gov.uk) in the Planning Section of the site.*

3. Why is the Spilsby site set out separately from the other commitments and allocations? Is the 350 homes in Table A additional to the 264 allocations in Table B for Spilsby?

commitments inland	2777
commitments coastal	1308
Spilsby site SPY310	350
Inland allocations	3901
<b>total</b>	<b>8336</b>

*The 350 homes are additional to the 264 homes for Spilsby. The site is set out separately because it is the largest one in the allocations and indicates the future growth direction for the town. Depending on the market it may all come forward over the plan period or run into the next plan period. The developer is having very positive discussions with the Council about the site and these are moving forward so that it is anticipated that an application will be submitted by the end of 2017.*

4. Is the supply from windfalls in CS Table A (as set out below) justified and where is this justification set out? How do these forecasts compare with past performance? Is past performance a reasonable forecast of what will happen (given the current Local Plan dates back to 1995/1999 - see para 30, page 28 of the CS which sees the number of windfalls reducing)?

*The number of windfalls in the District has always been high. Set out below is the breakdown of both windfall houses and houses on allocated sites cumulatively built post 2010. At January 2016 there were 7750 total completions giving 45.5% on Allocated sites and 54.5% on windfall. The Adopted old Local Plan came on line in 1995 and it appears not to have made large in roads into reducing the windfall contribution to housing supply.*

Year	Allocated	Windfall
2010	2720	2622
2011	2762	3098
2012	2972	3310
2013	3101	3318
2014	3323	3517
2015	3465	3849
2016	3524	4226

*A 15% windfall allowance is therefore in all likelihood an underestimate. Out of the 1543 homes granted permission in 2016, 68% were windfall. The Local Plan sets out that approximately 15% of the total target will be delivered by windfall over and above the site allocations throughout the life of the Local Plan. This equates to 1168 homes. The Council has delivered 90% of this figure in windfall permissions granted in the first year of the life of the Local Plan.*

5. Does the windfall allowance of 1165 relate to inland Large Villages and Towns? How is the figure justified?

*The windfall allowance does not just relates to inland towns and large villages but to all settlements. Paragraph 32 could be read in that way. Recommend a modification to the paragraph so that it reads;*

*A windfall site is any site that is not allocated in the Settlement Proposals Document. Windfall sites in the medium and small villages are dealt with under Policy SP4 and for the Coastal Zone in Policy SP18.*

6. The total for windfalls appears to add up to 1585 rather than the stated figure of 1935 – what is the correct figure?

Brownfield sites coastal zone	218
Brownfield sites medium and small inland villages	202
Windfall allowance 15% of target	1165
<b>Total</b>	<b>1935</b>

*1585 is the correct amount in the total box of Table A. However, during the period in between submitting the Plan for examination and working on these questions the Council worked on its draft Brownfield Land Register and part of this work, apart from getting the draft register ready for consultation was a desktop exercise to ensure our mapping records were up to date with regard to potential brownfield sites in the medium and small villages and the coast. This has actually increased the potential number of sites and commensurately the number of houses that could possibly come forward is 448 in the Coastal Zone and 245 in the Medium and Small Villages. That would make the total in Box A – 1858.*

*The Council is not stating that categorically the brownfield sites in Medium and Small Villages and the Coast will come forward and they are not counted in the 5 year supply, it is a potential supply of housing and a figure for each to category to measure and monitor against to measure the success of the policies in the Plan.*

7. Is the inland supply of 6678 (2777 inland commitments + 3901 inland allocations – Table A) sufficient to meet the inland minimum target of 6460 in Policy SP3?

*The Council believes that with the commitments and allocations there is sufficient housing to meet the housing target both inland and on the coast. As at the 30th April the inland commitments on windfall sites had risen to 3056. With regard to the allocations there are already 542 homes with permission.*

8. The CS (para 31, page 28) states that the supply of 8336 homes (Table A) includes a *buffer* of approximately 7.3% (568) on top of the housing target of 7768. Is this buffer sufficient to help ensure delivery of the overall housing target?

*The Council believes that the buffer of 7.3% will be sufficient to help ensure delivery of the overall housing target.*

9. Is ADM12 (which refers to the buffer being the difference between the target and amount of housing allocated) necessary for soundness? If so, should it refer to the amount of housing 'allocated and committed'?

*This was raised by a consultee during the consultation, and by adding this sentence it should make it clearer how the buffer was calculated, it is not necessary for soundness but for clarity. The sentence could be clearer by the additional of the word "committed". The Council would support a modification which altered the sentence to the following;*

*The buffer is the difference between the target and the amount of housing actually allocated and in the Settlement Proposals Document and commitments.*

10. The Housing Topic Paper states that past 10 year completions average 500/year but that over the 5 year period from 2011 to 2016 some 29% of completions were supported by the Council's Housing Capital Programme which is now coming to an end (para 2.21). In this context is a target of 7768 over the plan lifetime aspirational but also realistic and deliverable?

*The Council has a record for completions going back to 1981, there are peaks and troughs in that record, but even if we average completions over the last 16 years back to 2001, the District was building on average 488 homes per year.*

2001	663
2002	624
2003	487
2004	568
2005	497
2006	619
2007	732
2008	578
2009	681
2010	573
2011	246
2012	240
2013	276
2014	278
2015	405
2016/17	356

*Housing Commitments from 2001*

*The recession took a couple of years to really take effect in the District, it was not until 2010 that completions started to dip and then really fell in 2011. The national economic picture is improving and the District appears to be a few years behind that with a slow rise in completions again, despite the*

*fact that the Council`s Housing Capital Programme is coming to an end. The Council`s Housing Capital Programme was most likely cushioning the District against the full impact of the recession. The 405 completions in 2015 included the last major Housing Capital Programme site of 100 homes, yet the completions in 2016 show a rise to 356.*

*For the first three months of this year`s monitoring without any Housing Capital Programme sites the District completed 77 homes, extrapolated up for the year this will be 309 homes. This does not take into account the increase in starts they have risen from 628 in February 2016 to 726 in February 2017 to 829 by the end of April 2017. If this steady increase continues then completions should continue to rise throughout the year as sites progress. The Council believes that the target of 7768 is deliverable over the plan lifetime at the moment. There is of course a national question over the economic impact of Brexit but it`s not possible to plan for that.*

11. Has it been shown that the proposed housing development will be viable? Have appropriate policy costs been taken into account, including for affordable housing, space standards, building requirements, design and potential infrastructure contributions (for example, education and transport)?

What is the 5 year requirement?

*Note – the 5 year **requirement** will be considered at the Stage 1 hearings. Issues relating to whether the plans will be likely to help ensure that there is a reasonable prospect of a 5 year **supply** of housing being achieved, on adoption and through-out the lifetime of the plan, will be considered at the Stage 2 hearings. The Council will need to frame its response at the Stage 2 MIQs having regard to the questions asked below. In doing so, the Council should set out the supply evidence clearly indicating the sites that will make up the 5 year supply.*

*Note: The Council should prepare a succinct note that answers the following questions and sets out the evidence that justifies the answers.*

Relevant annual requirement?

1. Why is the 5 year housing land supply in the Housing Topic Paper (Box 1 – page 22) based on an analysis of the overall housing target between 2006 and 2021 and dwellings completed since 2006?

*The Council has always calculated a rolling housing supply from 2006 onwards. The Council has a position statement which it publishes on its website, all housing from 2006 onwards is on that spreadsheet (completions are hidden from view but they feed into the overall figures). Therefore the Council has always shown the housing picture from this date. The Council can remove this information.*

2. What annual requirement should be used as the baseline to calculate the 5 year requirement? Should it be based on the phased delivery set out in Policy SP3 (ie 591/year for 2016-21, 481/year 2021-25 and 482/year 2025-31?) If so, would the baseline 5 year requirement be as follows:

- 2017 to 2022 = **2845** (591 x 4 plus 481 x 1)
- 2018-2023 = **2735** (591 x 3 plus 481 x2) and so on?

Alternatively should the baseline figure be the plan target of 7768 divided by 15 years = 518/year (or **2590** for 5 years)?

Or the OAN of 7215 divided by 15 = 481/year x 5 = **2405** (for example, if the additional 553 was intended to help provide a 5 year supply rather than to meet an under-supply)?

*The Council is unsure that is meant by the question or which 5 year supply calculation is being looked at. The 5 year supply has been recalculated as at 31st January 2017 and is in the evidence base data at CD18 (without the local plan allocations) and CD19 (with the local plan allocations) utilising the housing trajectory from the local plan see below. From 2016 to 2021 the yearly target will be 591 per year then it will drop to 481 for the following 10 years as set out in the Core Strategy.*

*As set out in the relevant section of these questions, the Council is not convinced that there is an undersupply of housing nor has there been one, at least back as far as 2011. The population growth in the District comes from the in migration of mainly older persons with a declining natural population in that deaths outweigh births. Constraints on supply have not shown any of the market signals that would be expected, the housing register has gone down from 7160 in 2012 to 2029 in June 2016. Even taking into account changes in the way the register is managed this is a 71% decrease (taken from the Core Strategy paragraph 3 of Policy SP7); house prices have not risen significantly, as set out in the Housing Topic Paper CD15 at paragraph 7.5 a table from the ONS median house prices from December 2016 it shows that terrace houses have fallen in price slightly. The Council did look at how many second hand homes in the District were for sale in July 2016, the work was not complete because of other work pressures but from the work carried out, without the addition of Mablethorpe and the medium and small villages in total there were at the time 1616 homes for sale, which shows a healthy supply of housing.*

*Building completion rates though recovering have not significantly increased to try and meet a perceived demand or to fill a supply gap. In migration is continuing and the Council believes that the churn of the older population (in that those in migrants of the older cohorts are dying and leaving second hand houses empty and available) is substantial enough that it has soaked up any constraint on supply. The Council believes that this has been happening for some time, though it is impossible to pin point an exact year when it commenced. The Council therefore looked at the 5 year supply figure at the time of the start period of the Local Plan and*

*worked out what the gap was between what the 5 year supply figure was and what it should have been and then added that onto the OAN.*

*The Council could work out its 5 year supply figure by dividing 7768 by 15 so that the yearly housing figure was 518 a year. If the argument is accepted that the District does not have an undersupply and the addition onto the target of 553 was to make up a shortfall in the 5 year supply in February 2016.*

3. What is the base date for calculating the housing requirement in the plan and why? Is it 2011? (Box 1 refers to a target of 481/year from 2011-2015) Or the start of the plan period – 2016?

*Because of the issue with the East Midlands Regional Plan only providing a housing target of 600 until the review of the Regional Plan and then the Plan being revoked, the Council has not had a properly formulated housing target since approximately 2009. Therefore, the Council needed to know what could have been delivered and that is the reason, as set out in the Housing Topic Paper (CD15) that the Housing Target looks back to 2011. That is also why the housing requirement is split in Box 1 of the 5 year supply calculations so the Council hoped it would be clear how the final amount of housing required was worked out.*

#### Shortfall in delivery?

4. Has there been any shortfall in delivery against the annual requirement since the start of the plan period in 2016 or the base date for the plan in terms of the housing requirement if earlier – eg 2011?, whichever is appropriate? (see possible calculations below provided for illustrative purposes)

The possible calculations below are based in information provided in the Housing Topic Paper and are illustrative.

Box 1, Page 22 of the Housing Paper refers to a target for 2011-2015 of 481/year and for 2016-2021 of 591/year.

Page 9 of the Housing Topic Paper refers to total new build from 2011-2016 of 246, 240, 276, 278 and 405 = 1445. Page 36 refers to 323 completions in 2016

If a base date of 2011 is justified and the phasing targets in Box 1 are applied:

- the requirement between 2011 and 2017 would be **2996** (481 x 5 plus 591)?
- delivery between 2011 and 2017 was **1768** (1445 + 323)
- leaving a shortfall of **1228** to be recovered (2996 minus 1768)?

If an annual target of 481 is applied since 2011 for 2011-17 – 481 x 6 = 2886 minus 1768 delivered = **1118** shortfall?

If a base date of 2016 is justified:

- the requirement for 2016-17 would be **591?** (based on Box 1)
- delivery in 2016-17 was **323?**
- leaving a shortfall of **268** to be recovered (591 minus 268)?



These shortfall would be different if any of these figures or dates are varied.

*As set out above the Council is not convinced there was an actual shortfall in delivery. As set out above there appeared to be no market signals around a lack of supply of housing. However the Council had to accept that there was a shortfall in the 5 year supply at the time of completing the Plan.*

*As the Council has used 2011 as the base date for working out its housing then the shortfall could be 960 plus the shortfall in the first year of the life of the Local Plan which was 591 (target) less completions of 356 = 235. This therefore totals 1195. The calculations in the questions appears to have added an extra year which the Council is not sure is correct, because the figure run from January to January, so there are no completions for 2017 because we are in 2017 now, completions only run up to 31st January. But if we add in 2017 then the calculations would be*

*Target for 2011 - 2017 (481 x 5 + 591) = 2996*

*Completions up to 31st January = 1801*

*Shortfall = 1195*

*If there is an acceptance that there was no shortfall and that the Council added onto the 7215 target 553 to make up the 5 year supply so the total target was 7768 and this is the target divided by 15 years at 518 a year then the shortfall for year 1 would be 162. This then means the start date would be 2016.*

5. If there has been a shortfall since the relevant base date, should this be recovered over the next 5 years ('Sedgefield') or over the lifetime of the plan ('Liverpool') and why? What would the resulting 5 year requirement be for 2017-22 and 2018-23 and thereafter?

*The Council agreed to use the Sedgefield method of dealing with its perceived undersupply of housing because this is the accepted method and has been set out in the housing trajectory, but the Council has not calculated the undersupply as set out above. The Council assessed the five year supply as at the start point of the local plan and then calculated what the gap in delivery would be. It was 3.85 years in February 2016 that left a gap of 1.15 years at 481 homes per year which equaled the 553 homes added onto the baseline housing target of 7215.*

*The Council believes that the way it has calculated its shortfall is more appropriate and correct for the local situation in the District as it has been since around 2011. In hindsight maybe the Council should not have used the term "undersupply" but "shortfall on the five year supply" The Council would still have had to look back to 2011, because to work out whether you*

*have a shortfall on the five year supply you need to know what the supply could have been in the first place.*

5 or 20% buffer?

6. Should a buffer of 5 or 20% be added? Has there been a record of persistent under delivery of housing? Over what time period should this be considered (for example, in any of the years preceding 2011)? What were the relevant annual housing requirement targets for each of these past years [for example, based on the relevant and appropriate Regional Strategy or Local Plan target at that time], how many houses were delivered in each of those years, and what was the amount of under or over delivery against the requirement in each year and overall for the selected period?

*The Council believes the buffer should be 5%.*

*Preceding 2011 there were the following housing targets for East Lindsey*

*Structure Plan Alteration No1 set a target of 10200 dwellings between 1988 and 2001, assuming this intended to cover a 13 year period that would be 785 pa. During that period the District delivered on average 632 homes a year but with some large spikes in the late 80`s.*

*The deposit draft Structure Plan 1998 aimed to amend that figure to 13700 over the period 1991 to 2011 equal to 685 pa. During that period the District delivered 566 homes a year. That would, presuming the calculations of need were correct be a shortfall of 2709. However, there were only two years in that period that the figure was exceeded.*

*RSS8 (2004) only provides a target for the Counties. For Lincolnshire that was 2750 per annum of which (assuming the split in the deposit draft SP was applied) 20.5% would be 'allocated' to EL. That would equate to about 11275 in total or 564 per annum.*

*The Regional Plan 2009 used housing commitments as its target of 600 per year.*

*Over such a long period with so few years of actually hitting those targets it has got to be surmised that they were incorrect and too high. There is no way of verifying this now but the Council would dispute this as evidence of a persistent under delivery because there is no way of checking the background information that formed the targets. At least since 2011 the Council can see that there is no constraint on supply and the usual market signals that demand is outstripping supply are just not present in the District. The only other evidence that the previous housing figures could have been wrong is the trend line in house sales and completions which shows a long term downward trend. This is set out on pages 37 and 38 of the Housing Topic Paper (CD15).*

*The Council is also still granting planning permissions and is not constraining sites by refusing applications. The number of starts within the District does appear to be rising and the total number of commitments in the District as at the 30<sup>th</sup> April was 5140 that is up from 4086 at the start period of the Plan. If 50% of those commitments came forward in the next 5 years that is 514 homes a year and that is without the majority of the site allocations. There is little the Council can do to bring more housing forward other than to keep granting permissions but there is a danger that there will be so many sites with permission that it will start to drive down land values even further and sites will become unviable. Therefore the Council believes a 5% buffer is adequate at the present time. This matter is kept under review as a matter of course and when the 5 year supply information is assessed this is also assessed.*

7. The Housing Topic Paper (page 11) appears to indicate that a 5% buffer should be applied because the under delivery of housing has been caused by a lack of demand? Is this consistent with para 47 of the Framework which seeks a 20% buffer where there has been a persistent under delivery (to provide a realistic prospect of achieving the planned supply and to ensure choice and competition in the market for land)?

*The Council still believes that the buffer for the District should be 5%. Lack of building of housing in the District is coming in general from a lack of demand most likely associated with the recession and slow recovery rate. The Council has a good understanding of the market in the District because it contacts all those persons/developers/builders who are granted planning permission across the District to ask them when they are going to deliver their sites. There are many reasons for sites not coming forward the main ones are waiting for the market to improve and sites up for sale with planning permission waiting to be sold.*

*The Council is also still granting planning permissions and is not constraining sites by refusing applications. The number of starts within the District does appear to be rising and the total number of commitments in the District as at the 30<sup>th</sup> April was 5140 that is up from 4086 at the start period of the Plan. If 50% of those commitments came forward in the next 5 years that is 514 homes a year and that is without the majority of the site allocations. There is little the Council can do to bring more housing forward other than to keep granting permissions but there is a danger that there will be so many sites with permission that it will start to drive down land values even further and sites will become unviable. Therefore the Council believes a 5% buffer is adequate at the present time. This matter is kept under review as a matter of course and when the 5 year supply information is assessed this is also assessed.*

Notes relating to questions 6 and 7

Box 1, page 22 in the Housing Topic Paper refers to a target of 600/year from 2006-2010 and 481/year from 2011-2021.

Page 9 of the Housing Topic Paper refers to completions from 2011-2016 of 246, 240, 276, 278 and 405 = 1445 and Page 36 to 323 completions in 2016

Page 38 of the Housing Topic Paper has a graph which does not set out precise figures but appears to show an annual delivery range between 2001 and 2010 of around 500 to 700. And a 30 year average of 548/year

In this context the PPG states that: The assessment of a local delivery record is likely to be more robust if a longer term view is taken, since this is likely to take account of the peaks and troughs of the housing market cycle.

### 5 year requirement conclusions

8. What would be the 5 year requirement be for 2017-22 and for 2018-23, taking account of the recovery of any shortfall and if 5 and 20% buffers are applied – for example would it be as follows (this based on the figures in question 2 and noting that the actual figures will depend on the answers to the questions above – for example, if a different starting point for the 5 year requirement is arrived at – eg 2405 or 2590):

2017-22 - 2845 plus 5% = 2987?

2017-22 - 2845 plus 20% = 3414?

2018-23 - 2735 plus 5% = 2871?

2018-23 - 2735 plus 20% = 3282?

Note: the recovery of any shortfall since 2016 will need to be added to the figures above *before* the % buffer is added – see question 5 above.

*The Council is unclear what the question is asking for. The Council attaches two versions of the 5 year supply one with a 5% buffer applied and one with a 20% buffer applied. The Council has removed the references to the dates 2006 – 2010, so the start date for the calculation is now 2011. The Council has added on an additional year for the first year of the life of the Plan.*

9. For clarity, should the overall position on 5 year supply be set out in the plan (ie annual targets/requirement, completions since the start of the plan period/base date, the approach to catching up any shortfall and the 5 or 20% buffer)?

*The Council does not want to put the details of the 5 year supply in the main body of the plan, it changes too often and makes the plan appear out of date. The Council would be content with the information going into the back of the plan as an appendix which is referenced to in the policy and could then be updated via the Council`s website yearly. The Council is striving to try and make the local plan accessible for all and has tried to keep the technical "planning speak" to a minimum. Many residents find the details of the 5 year supply complicated and they struggle to understand it and therefore having an appendix allows the Council more room to put in more explanatory detail.*

10. Should a Housing Trajectory graph be included in the Plan (showing the average annual requirement as adjusted to recover past shortfall,

completions to date, the amount of development forecast each year to the end of the plan period and an overall 'managed delivery' trajectory)?

*The same would apply as above, the Council are content with words in the plan explaining any trajectory.*



**EAST LINDSEY DISTRICT COUNCIL**

**5 YEAR HOUSING SUPPLY**

**POSITION UP TO THE 31<sup>ST</sup> JANUARY 2017**

**WITH THE EMERGING LOCAL PLAN  
ALLOCATIONS WITH 5% BUFFER**

**BOX 1 – TARGET**

**How much housing the Council should be delivering over the next 5 years.**

<b>Revised 5 year target 2011 – 22</b>	
Target for 2011 - 2015 (481 x 5)	2405
Target for 2016 – (591 x 1)	591
2017 – 2022 (591 x 4 + 481 x 1)	2845
Overall target 2011 -2021	5841
Less dwellings completed 2011 –31 <sup>st</sup> January 2017	1801
<b>Sub total</b>	<b>4040</b>
Plus 5% of overall target (5% of 4040)	202
<b>Total target (Y)</b>	<b>4242</b>

**BOX 2 – COMMITMENTS**

**If everything came forward with no constraints**

Allocated sites in the Emerging Local Plan to come forward in the next five years. (Inland)	1300
5 yrs. of the 7.3% buffer of allocated sites in the Emerging Local Plan. (8336 – 7768 / 15 *5)	189
Windfall sites with planning permission	3494
Old Allocated sites from the 1995 Local Plan	1095
Pipeline sites	398
<b>Total commitments</b>	<b>6476</b>

**BOX 3 – PIPELINE SITES**

**Pipeline sites for the Council are those that have been approved but are waiting for their S106 to be signed, the Council has contacted the developer and confirmed that they are going to bring the site forward.**

<b>Application No</b>	<b>No of units</b>	<b>Comments on deliverability</b>	<b>No of units to go in 5 year supply</b>
N/085/00883/15	Nil – already counted	Developer has confirmed that they are going to bring the site forward, with a reserved matters application shortly. It is already allocated in the Local Plan.	Nil – already counted
S/086/01335/15	21	Applicant aims to move their business to a more appropriate location and develop the site	21
S/023/00259/16	6	Developer has confirmed that they are going to bring the site forward, seeking funding at the present time.	6
N/110/00509/16	1	Unknown, spoke to the agent and they do not know if it is going to come forward	Nil
N/215/01572/16	150 but with the loss of 2 existing properties = 148	Developer confirmed that they are going to bring the site forward during the determination of the application.	148
N/092/1853/16	Nil – already counted	Developer confirmed through the Local Plan consultation that they are going to bring the site forward – it is already an allocated site in the Local Plan	Nil – already counted
S/215/01969/16	49	Developer confirmed that they are going to bring the site forward during the determination of the application.	49
S/216/02053/16	70	Contacted the applicant they do wish to bring the site forward within 5 years and will be working toward this	70
N/085/00588/16	103	Developer confirmed that they are going to bring the site forward during the determination of the application.	103
<b>TOTAL</b>	<b>398</b>		<b>397</b>

**DELIVERABILITY OF SITES**

The box below shows the deliverable commitments in current market conditions, after the Council has assessed individual sites by speaking to developers and planning officers, checking building control records and carrying out site visits. The Council monitors this monthly through its position statement which is published twice a year on the Councils website.

<b>BOX 4 – DELIVERABILITY OF SITES</b>	
Allocated sites in the emerging Local Plan	1300
5 yrs. of the 7.3% buffer of allocated sites in the Emerging Local Plan. (8336 – 7768 / 15 *5)	189
Allocated sites from the Old 1995 Local Plan	407
Windfall sites	2173
Pipeline sites	397
<b>Total (X)</b>	<b>4466</b>

**CALCULATING THE 5 YEAR HOUSING SUPPLY**

Taking the information from boxes 1 and 4 above the calculation of the supply is (X/Y) x 100

After this an allowance is made for windfall sites coming forward over the next 5 years. (See notes below on how this is calculated)

<b>BOX 5 – CALCULATING THE 5 YEAR HOUSING SUPPLY</b>	
(4466/4242) X 100	105%
<b>144% x 5 = 5.26 years</b>	
<b>FINAL 5 YEAR SUPPLY FIGURE</b>	<b>5.26 years</b>



## WINDFALL ALLOWANCE

The NPPF states that Local Authorities may make an allowance for windfall sites in their five year housing land supply if they have compelling evidence that such sites have consistently become available in the local area and will continue to provide a reliable source of supply. Historically, windfall sites have contributed up to 50% of the District's total housing supply. Many of these are very small-scale, infill sites, developed by the many local building companies in the District. These small companies have provided housing 'to order' for customers, thus making them less susceptible to the wider economic fluctuations experienced by volume house builders, thus ensuring a continuous level of delivery. Having an up to date Local Plan with site allocations, phasing sites, monitoring delivery and having a clear delivery pathway for housing should see this reduce. However, because of the long historical trend of this type of delivery, the type of sites that are delivered in this way and the local nature of the delivery, the Council believe it has compelling evidence to make an allowance for windfall sites in its housing supply. This allowance it is believed should be 15% of the total housing target set out at (Y) in Box 1 above added into the deliverable commitments (X).

<b>BOX 6 – CALCULATING THE 5 YEAR HOUSING SUPPLY INCLUDING WINDFALL SITES</b>	
$(4466/4242) \times 100$	105%
Plus 15% windfall site allowance $4466 \times 15\% = 669$ added onto X which is 5135	5135
$(5135/4242) \times 100$	121%
<b><u>FINAL 5 YEAR SUPPLY FIGURE</u></b>	<b><u>6.05</u></b>

**BOX 1 – TARGET**

**How much housing the Council should be delivering over the next 5 years.**

<b>Revised 5 year target 2011 – 22</b>	
Target for 2011 - 2015 (481 x 5)	2405
Target for 2016 – (591 x 1)	591
2017 – 2022 (591 x 4 + 481 x 1)	2845
Overall target 2011 -2021	5841
Less dwellings completed 2011 –31 <sup>st</sup> January 2017	1801
<b>Sub total</b>	<b>4040</b>
Plus 20% of overall target (20% of 4040)	808
<b>Total target (Y)</b>	<b>4848</b>

**BOX 2 – COMMITMENTS**

**If everything came forward with no constraints**

Allocated sites in the Emerging Local Plan to come forward in the next five years. (Inland)	1300
5 yrs. of the 7.3% buffer of allocated sites in the Emerging Local Plan. (8336 – 7768 / 15 *5)	189
Windfall sites with planning permission	3494
Old Allocated sites from the 1995 Local Plan	1095
Pipeline sites	398
<b>Total commitments</b>	<b>6476</b>

**BOX 3 – PIPELINE SITES**

**Pipeline sites for the Council are those that have been approved but are waiting for their S106 to be signed, the Council has contacted the developer and confirmed that they are going to bring the site forward.**

<b>Application No</b>	<b>No of units</b>	<b>Comments on deliverability</b>	<b>No of units to go in 5 year supply</b>
N/085/00883/15	Nil – already counted	Developer has confirmed that they are going to bring the site forward, with a reserved matters application shortly. It is already allocated in the Local Plan.	Nil – already counted
S/086/01335/15	21	Applicant aims to move their business to a more appropriate location and develop the site	21
S/023/00259/16	6	Developer has confirmed that they are going to bring the site forward, seeking funding at the present time.	6
N/110/00509/16	1	Unknown, spoke to the agent and they do not know if it is going to come forward	Nil
N/215/01572/16	150 but with the loss of 2 existing properties = 148	Developer confirmed that they are going to bring the site forward during the determination of the application.	148
N/092/1853/16	Nil – already counted	Developer confirmed through the Local Plan consultation that they are going to bring the site forward – it is already an allocated site in the Local Plan	Nil – already counted
S/215/01969/16	49	Developer confirmed that they are going to bring the site forward during the determination of the application.	49
S/216/02053/16	70	Contacted the applicant they do wish to bring the site forward within 5 years and will be working toward this	70
N/085/00588/16	103	Developer confirmed that they are going to bring the site forward during the determination of the application.	103
<b>TOTAL</b>	<b>398</b>		<b>397</b>

## DELIVERABILITY OF SITES

The box below shows the deliverable commitments in current market conditions, after the Council has assessed individual sites by speaking to developers and planning officers, checking building control records and carrying out site visits. The Council monitors this monthly through its position statement which is published twice a year on the Councils website.

<b>BOX 4 – DELIVERABILITY OF SITES</b>	
Allocated sites in the emerging Local Plan (Inland)	1300
5 yrs. of the 7.3% buffer of allocated sites in the Emerging Local Plan. (8336 – 7768 / 15 *5)	189
Allocated sites from the Old 1995 Local Plan	407
Windfall sites	2173
Pipeline sites	397
<b>Total (X)</b>	<b>4466</b>

## CALCULATING THE 5 YEAR HOUSING SUPPLY

Taking the information from boxes 1 and 4 above the calculation of the supply is  $(X/Y) \times 100$

After this an allowance is made for windfall sites coming forward over the next 5 years. (See notes below on how this is calculated)

<b>BOX 5 – CALCULATING THE 5 YEAR HOUSING SUPPLY</b>	
$(4466/4848) \times 100$	92%
<b>92 % x 5 = 6.31 years</b>	
<b>FINAL 5 YEAR SUPPLY FIGURE</b>	<b>4.60 years</b>

## WINDFALL ALLOWANCE

The NPPF states that Local Authorities may make an allowance for windfall sites in their five year housing land supply if they have compelling evidence that such sites have consistently become available in the local area and will continue to provide a reliable source of supply. Historically, windfall sites have contributed up to 50% of the District's total housing supply. Many of these are very small-scale, infill sites, developed by the many local building companies in the District. These small companies have provided housing 'to order' for customers, thus making them less susceptible to the wider economic fluctuations experienced by volume house builders, thus ensuring a continuous level of delivery. Having an up to date Local Plan with site allocations, phasing sites, monitoring delivery and having a clear delivery pathway for housing should see this reduce. However, because of the long historical trend of this type of delivery, the type of sites that are delivered in this way and the local nature of the delivery, the Council believe it has compelling evidence to make an allowance for windfall sites in its housing supply. This allowance it is believed should be 15% of the total housing target set out at (Y) in Box 1 above added into the deliverable commitments (X).

<b>BOX 6 – CALCULATING THE 5 YEAR HOUSING SUPPLY INCLUDING WINDFALL SITES</b>	
$(4466/4848) \times 100$	92%
Plus 15% windfall site allowance 4466 x 15% added onto X which is 669 + 4466	5135
$(5135/4848) \times 100$	106%
<b><u>FINAL 5 YEAR SUPPLY FIGURE</u></b>	<b><u>5.30</u></b>