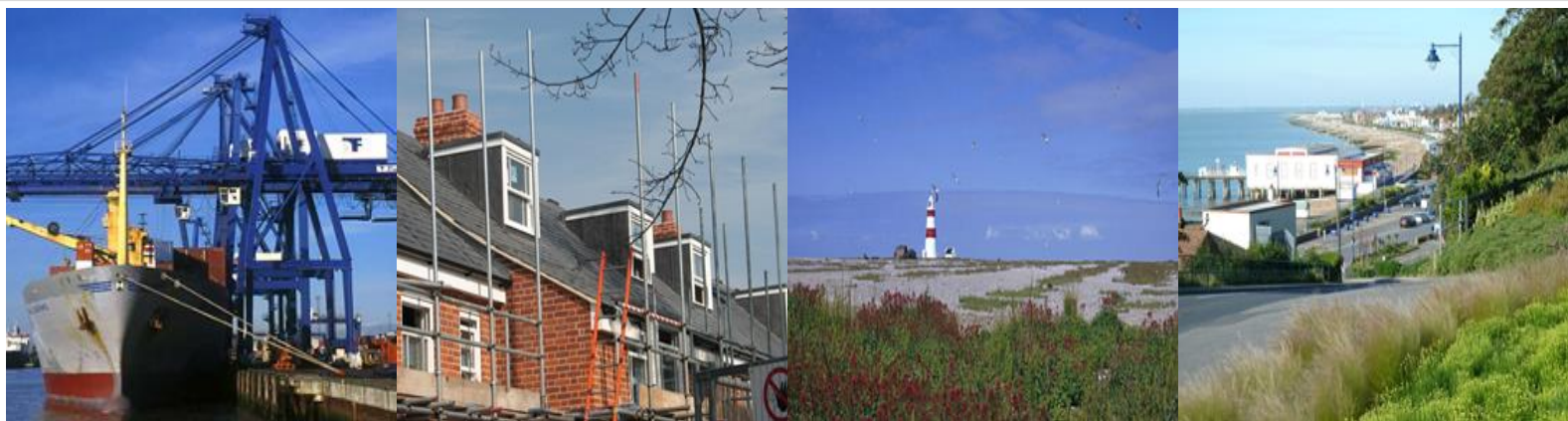


# Local Plan Examination

## Post Hearing Statement: SCDC Position Statement Housing Land Supply

September 2016

### Site Allocations and Area Specific Policies & Felixstowe Peninsula Area Action Plan Development Plan Documents





## **SCDC Position Statement Housing Land Supply - Facts / Principles post Joint Examination Hearings (September 2016)**

1. The August Update was not, and was never intended to be, a full housing land supply update. It's purpose was to correct an error in the earlier calculation of the five year supply. The update also provided the opportunity to clarify the position with sites that the Council had previously left out of the supply, having taken a conservative approach to the Housing Land Supply assessment. This also provided the Inspector and others appearing at the Hearing with a feel for the direction of travel for the housing land supply situation in response to specific examination questions. The questions covered matters such as permissions granted post 1<sup>st</sup> April 2016; additional information on windfall provision and timescales for deliverability of a number of sites.
2. The Council will not be providing a full updated housing land supply position to 31<sup>st</sup> August 2016. This would require a significant amount of work to check planning permissions, completions and to get updated information out and back from developers within the timeframe for the Inspector (2 weeks from the close of hearings (ie 16/9/2016). Best practice and recent appeals would suggest that if a mid year review was to be undertaken it should be a full review and the five year period re-calculated from that point.
3. For comparison purposes, monitoring takes place on an annual basis. The monitoring period for all the Council's other monitoring work continues to be 1<sup>st</sup> April to 31<sup>st</sup> March the following year. It is more logical to retain 1<sup>st</sup> April as the base date for the housing land supply monitoring.
4. The Council has accepted that June 2016 Housing Land Supply document contains an error when calculating the five year housing land supply in relation to the number of dwellings phased for inclusion within the five year period. The revised calculations for a 5% and 20% buffer are provided at the end of this note. The calculation confirms that the Council has a 5.4 yr housing land supply with a 5% buffer. The main document explains why the Council considers 5% to be the correct buffer to apply.
5. The Council has considered its 5yr Housing Land Supply Assessment (June erratum) having regard to the decision handed down by the Secretary of State for Communities and Local Government in relation to Uttlesford (APP/C1570/A/2213025 (August 2016). This decision provides clear thinking in respect of the government's latest thoughts on the purpose of a five year supply, windfall, lapse rates and buffers. The Council considers that the approach it has taken, having regard also to local circumstance for Suffolk Coastal district, is in accordance with the principles set out in that decision letter. In particular, additional evidence was provided in respect of windfall provision (Tables 3 and 4 of the August update). In discussion at the Hearing sessions, the Council confirmed that local rates of lapsed permissions was negligible based on information from the SCDC housing land supply monitoring. Reference was also made to the fact that at the time the Core Strategy was examined (and subsequently adopted), it had only one remaining housing allocation.
6. Buffer. The June (erratum) [F-09] provides detail in Table 1 to show that progress has been made year on year since the start of the plan period towards achieving a five year supply. It shows that over the last two years completion rates have risen significantly and that this is expected to continue. The Council can also demonstrate a healthy supply of land coming forward over the five

year period through a combination of outstanding planning permissions and site allocations. The Council remains strongly of the view that a 5% buffer is the appropriate one to use.

7. The calculations show that based on 7,900 homes, a 5% buffer and the application of the Sedgefield approach the Council has a 5.4 year housing land supply. If a 20% buffer is applied, the calculations show a 4.7 year housing land supply. These housing figures represent a conservative estimate of numbers of homes which might come forward.

8. The following information re-iterates and further updates information contained in the August Update on sites discussed through the Hearings. It demonstrates that the Council has taken an even handed approach to the update. The Council is prepared to amend the methodology to five year housing land supply where appropriate (windfall allowance). The document provides evidenced confirmation of the direction of travel with regard to the Councils five year housing land supply, which is that it is increasing. Factual evidence is provided in respect of individual sites where progress on delivery has been made post 1<sup>st</sup> April 2016. It provides a clear message that the Council's housing land supply position is improving.

- Windfall – The Council agree that this should be discounted for the first two years of the period to account for small sites (<5) already permitted. Notwithstanding this fact evidence shows that the Council regularly receives applications for in excess of 50 homes per year and as such it is appropriate for a windfall allowance to be applied to the remaining 3 years within the 5yr housing land supply period [Tables 3 and 4 of the August Update].
- Adastral Park – the information provided by David Lock (on behalf of BT) and by CEG to the Hearings (reproduced in the Councils Hearing Statement on Issue 3 [G-03] confirm their intentions for the site and their anticipated build out rate. This is a slight reduction on that shown in the June (erratum) Housing Land Supply assessment. Woods Lane Melton. This site is no longer subject to legal challenge and is expected to contribute 180 units in the 5yr period. Permission was granted on appeal in September 2015. It is appropriate that this is now phased for completion through the five year period.
- Fairfield Road, Framlingham. This site has been allowed on appeal, 25 April 2016. It is expected to contribute 163 units in the 5yr period.
- Land west of Ferry Road residential centre, Felixstowe. This site already has outline planning permission for 200 homes. Pre-application consultation was undertaken in June 2016 prior to submission of a reserved matters application. Anticipated delivery on this site has therefore been brought forward by a year.
- Site FPP8 - Land off Thurmans Lane – Part of this site is subject to resolution to grant planning permission for 98 homes in June 2016. Another part of the site is the subject of an as yet undetermined outline application for up to 50 units. Development of this site may be brought forward slightly earlier.
- Site FPP6 – Land opposite the Hand in Hand PH, Felixstowe has been subject of pre-application consultation for 70 homes. This site is subject to an as yet undetermined outline application for up to 70 units. It will be expected to contribute in the 5yr period.
- Site SSP6 – this site now has outline planning permission for 9 units. This is a reduction of 6 units on the number anticipated through the plan. Development is expected to occur within the 5 year period.

- Site SSP12 for 50 units (possibly more) – information was provided at the Hearing that an outline planning application is due to be submitted before the end of the year, with a reserved matters application mid 2017. This allocation should be brought forward into the 5yr period. It was previously shown as coming forward outside of the 5 year period.
- Omission site 3022a Trimley St Martin – this site is now subject to a resolution to grant planning permission (Planning Committee 5<sup>th</sup> September 2016). This is a fully detailed application and would be expected to contribute through the 5 year period.
- Omission sites (982 Aldeburgh, 3022b Trimley St Martin and Great Street Farm, Trimley St Mary). These sites should not be included in the identified housing land supply. If permission is granted, it will show as an adjustment in next years 5yr housing land supply document. There is currently insufficient certainty ahead of their consideration by the Planning Committee.
- Land at School Lane Bawdsey for 13 homes – this site was subject to a resolution to grant planning permission in January 2016 subject to completion of a legal agreement. It is unclear at present whether the developers will continue with this scheme or submit an alternative scheme. Uncertainty means that this site is not currently included in Appendix A.

## Corrected Housing Land Supply of June (erratum) Housing Land Supply Housing Land Supply [F-09]

**Table 1: Calculation with 5% buffer**

<b>Source</b>	<b>Nos of dwellings</b>
Sites with planning permission for 5 or more dwellings phased for completion (2016-2021).	1897
Sites with planning permission for less than 5 dwellings phased for completion (2016-2021).	428
Annual windfall allowance (50 per yr) (source Core Strategy).	200
Sites where principle of development accepted.	
<ul style="list-style-type: none"> <li>Anticipated contribution – Adastral Park (2016 – 2021) (source BT)</li> </ul>	375
Anticipated contribution from allocations from SCDC site allocations documents not subject to challenge on grounds of deliverability or phased post 2021 due to infrastructure constraints or expressed landowner preference (Appendix A)	630
<b>Total supply (2016 - 2021)</b>	<b>3,530</b>
<b>Identified 5yr + 5% requirement (651 x 5)</b> <b>(source Table 2)</b>	<b>3,254</b>
<b>5yr supply position (3, 530 ÷ 651)</b>	<b>5.4 year supply</b>

**Table 2: Calculation with a 20% buffer**

<b>Source</b>	<b>Nos of dwellings</b>
Sites with planning permission for 5 or more dwellings phased for completion (2016-2021).	1,897
Sites with planning permission for less than 5 dwellings phased for completion (2016-2021).	428
Annual windfall allowance (50 per yr) (source Core Strategy).	200
Sites where principle of development accepted.	
<ul style="list-style-type: none"> <li>Anticipated contribution – Adastral Park (2016 – 2021) (source BT)</li> </ul>	375
Anticipated contribution from allocations from SCDC site allocations documents not subject to challenge on grounds of deliverability or phased post 2021 due to infrastructure constraints or expressed landowner preference (Appendix A)	630
<b>Total supply (2016 - 2021)</b>	<b>3,530</b>
<b>Identified 5yr + 20% requirement (744 x 5)</b> <b>(source Table 2)</b>	<b>3,720</b>
<b>5yr supply position (3,530 ÷ 744)</b>	<b>4.7 year supply</b>