

NORTH EAST DERBYSHIRE LOCAL PLAN EXAMINATION



STATEMENT OF NORTH EAST DERBYSHIRE DISTRICT COUNCIL

22 OCTOBER 2018

MATTER 11

**Housing Delivery & 5 Year Housing Supply
(Policies LC2, LC3, LC4, LC5, LC6, LC7)**

BLANK PAGE

Main Matter 11 – Housing delivery & 5 year housing land supply

Issue – Will the plan provide an appropriate choice and mix of housing to meet the needs of different groups in the community?

Question 11.1

Are the thresholds and targets for affordable housing in Policy LC2 justified and based on robust assessment of economic viability? Having regard to the spatial distribution of new development and the location of High Value Areas on the Policies Map, will the policy be effective in meeting affordable housing needs?

Council's Response:

- 11.1.1 Policy LC2 is underpinned by the Whole Plan Viability Assessment (WPVA) (**EB-IV2a & b**). The methodology used in the assessment to test viability takes into account all the relevant costs and values of proposed development in the District including the impact of all relevant policy costs such as affordable housing.
- 11.1.2 The cost and value assumptions used in the WPVA are clearly set out in Chapter 4 on pages 43 to 62 of the assessment (**EB-IV2a**). This includes the approach to setting benchmark land values which has been informed by recent land transactions in the district in the Land Valuation Report undertaken by Valuation Audit Services (Appendix 4 of **EB-INV2b**). The benchmarks adopted are considered to represent a competitive return to the landowner as required by the NPPF (paragraph 173).
- 11.1.3 The evidence underpinning the assessment also includes an up to date district-wide analysis of residential property values using Land Registry data at a postcode sector level. This analysis resulted in the formation of average sales values on a £/m² basis for four different value areas. These values are set out in Table 4.8 on page 51 of the assessment (WPVA) (**EB-IV2a**).
- 11.1.4 Affordable housing impacts have been tested using a 'sliding scale' of affordable housing percentage targets in the four identified value areas across the district i.e. 10%, 20%, 30% & 40% affordable housing in different value areas defined as VA1, VA2, VA3 & VA4. The testing has been applied to a range of residential typologies and mixes that are considered to reflect the type of housing development likely to come forward over the plan period. The typologies broken down by unit type, size profile and density are set out in Appendix 3 of the WPVA (**EB-IV2a**).
- 11.1.6 The general pattern of results as reproduced in Table 13.5 of the WPVA (**EB-IV2a**) is as follows:

	40% AH	30% AH	20% AH	10% AH	0% AH
VA1	X	X	X	X	X
VA2	X	X	=	√	√
VA3	X	√	√	√	√
VA4	√	√	√	√	√

- 11.1.7 As in 11.1.6 above, the viability results indicate that on the basis of a realistic assumption of the local build cost base then development in Value Area 2 is marginally viable with 20% affordable housing, and in the higher Value Areas 3 and 4, 30% affordable housing is viable.
- 11.1.8 It is noted that while the general pattern of results show development in Value Area 1 to be unviable, it is considered that these values are unduly influenced by second hand housing stock. In addition, it has been found that new build accommodation within Value Area 1 typically commands a significant premium that more closely resembles values consistent with Value Area 2, and where development is marginally viable with 20% affordable housing.
- 11.1.9 On this basis, the Council considers that the thresholds and targets for affordable housing as set out in Policy LC2 are justified by the evidence on economic viability as contained in the WPVA (**EB-INV2a & b**).
- 11.1.10 Based on the evidence it was determined that a higher value zone in the west of the district existed which warranted the application of a higher percentage policy target for affordable housing. This is defined on the Publication Draft Local Plan Policies Maps as the Affordable Housing High Value Area It extends north to south across the west of the district and includes the Level 1 town of Dronfield together with the settlements of Holmesfield, Barlow, Barlow Commonsides, Cutthorpe, Old Brampton, Wadshelf, Unstone, Unstone Green, Apperknowle, Holymoorside, Kelstedge, Ashover, and Wessington categorised as Level 3 in the Plan's settlement hierarchy.
- 11.1.11 Within the Higher Value Area, the opportunity to deliver some affordable housing will arise mainly from the housing allocations at Dronfield and any other exception site that may come forward at the Level 3 settlements. However, the overall levels of affordable housing within the Higher Value Area is necessarily limited by the Plan's strategy which directs development to other sustainable locations elsewhere in the district and other environmental factors most notably the Green Belt. Taking these factors into account, it is considered that the Plan provides a pragmatic and balanced approach that delivers a sustainable pattern of development across the district whilst at the same time maximising the opportunities to deliver affordable housing.

Question 11.2

Would the design requirements set out in Policy SDC12 have any impact on the viability of Policy LC2 and the delivery of housing?

Council's Response:

- 11.2.1 No, the council considers that Policy SDC12: High Quality Design and Place-Making does not impose any particular specific architectural features, use of materials or other special design requirements that would result in extra over design costs. Rather the policy aims to promote good design through a number of general design principles such as relating to the layout and orientation of buildings.
- 11.2.2 The cost implications of Policy SDC12 has been appropriately factored into the BCIS benchmark construction costs used in the analysis of development viability though the Whole Plan Viability Assessment (**EB-IV2a & b**) - para's 3.113 to 3.118 refer. As such it is not considered that the Policy SDC12 imposes policy burdens that would threaten the delivery of housing across the district and in particular the viability of affordable housing as required by Policy LC2.

Question 11.3

Is Policy LC3 clear and will it be effective? Should it include reference to regeneration led schemes and is the different approach to Green Belt/non Green Belt schemes justified?

Council's Response:

- 11.3.1 Policy LC3 clearly sets out that as an exception, planning permission may be granted for affordable housing on sites where residential development would not normally be allowed, subject to the criteria set out in the policy. The Council considers that the policy will be effective, in particular because it allows a subsidiary element of market housing to support the delivery of the affordable housing.
- 11.3.2 The Council does not consider it appropriate to include a specific reference to regeneration led schemes in this policy. The policy as drafted is sufficiently flexible to allow for regeneration schemes. Additionally, the policies set out in the Publication Draft Plan as a whole adequately support regeneration in suitable locations.
- 11.3.3 The Council considers that the different approach to Green Belt/non Green Belt schemes is justified in this policy. Paragraphs 87 to 90 of the 2012 NPPF are clear that the construction of new buildings is regarded as inappropriate in the Green Belt, unless it is for limited affordable housing for local community needs or in certain circumstances Market Housing, for example for the infilling or redevelopment of previously developed land. However Market Housing for any other purpose is by definition inappropriate and should not be included within the exception sites policy covering the Green Belt.

Question 11.4

Is Policy LC4 soundly based and flexible to meet changing needs and are the requirements for accessible and adaptable homes justified by the evidence?

Council's Response:

- 11.4.1 Policy LC4 is soundly based on evidence from the Strategic Housing Market Assessment (SHMA) update 2017 (EB-HOU4), in relation to the need for specific types and mix of housing, housing for older and disabled people and self and custom build housing. It is also considered to be sufficiently flexible to meet changing needs.
- 11.4.2 Part 1 of Policy LC4 does not specify a particular mix, referring only to 'an appropriate' mix, thereby being flexible in its application on a site by site basis. Table 5.1 in the Publication Draft Local Plan includes a recommended size mix for new market housing, which is based on paragraphs 7.23 to 7.28 of the 2017 SHMA-OAN Update (**EB-HOU4**). However, paragraph 5.84 of the Publication Draft Local Plan makes it clear that these figures are indicators against which delivery is monitored rather than a target for each site.
- 11.4.3 Part 2 supports the provision of housing for older people and specialist housing, and also provides an 'exception' for specialist housing in areas where residential development (including residential institutions) would not normally be allowed. This is considered justified by evidence in the SHMA Update (**EB-HOU4**), chapter 8, which identifies a need for 61 specialist housing units per annum and 23 registered care bed-spaces per annum.
- 11.4.4 The requirement for **accessible and adaptable homes** in part 3 of Policy LC4 is also justified by evidence, as set out in chapter 8 of the SHMA Update (**EB-HOU4**). This chapter refers to the Planning Practice Guidance Note 56, entitled Housing: Optional Technical Standards, which sets out how local authorities can gather evidence to set requirements on issues such as accessibility and wheelchair housing standards, water efficiency standards and internal space standards. Chapter 8 of the SHMA Update (**EB-HOU4**) looks at the first two of these (i.e. accessibility and wheelchair housing) as well as considering the specific needs of older people. The chapter draws on a range of statistics, including those suggested in the PPG.
- 11.4.5 The SHMA Update (**EB-HOU4**) data shows that in general, the District has a high level of disability when compared with other areas and that an ageing population means that the number of people with disabilities is expected to increase substantially in the future. Key findings include:
- At 2015 the older person population in North East Derbyshire is 23.7% of its total population, compared to only 17.7% in England and 18.8% in the East Midlands (SHMA Update table 76).
 - 40.6% increase in the population aged 65+ (SHMA Update table 77).
 - 30% of household growth identified in the CLG projections to be specialist housing for older persons (need for 61 specialist units – Table

79; compared to CLG Demographic projections of 204 dwellings – Table 15).

- 64.7% increase in the number of older people with mobility problems (SHMA Update table 81)
- 28.6% of the District's households contains someone with a long-term health problem or disability, compared to 25.7% in England and 26.2% in the East Midlands (SHMA Update table 82), the majority of which is aged 65 and over (SHMA Update Figure 20).
- 19.7% increase in the number of people with a long-term health problem or disability (LTHPD) (SHMA Update Table 83).
- In relation to the tenures in which people with a Long-Term Health Problem or Disability live; it shows that 33% of people living in socially rented accommodation have a Long-Term Health Problem or Disability, compared with 18.8% of people living in other tenures (SHMA Update Table 84).
- A need for around 6% of dwellings to be wheelchair adapted (M4(3)), based on the 2014-based Household Projections.

11.4.6 The above demonstrates that there is a clear need to increase the supply of accessible and adaptable dwellings and wheelchair user dwellings. The Council considers that a requirement for 20% accessible and adaptable homes is appropriate and justified by the evidence. The overall impact of the requirement on viability was also assessed in the Whole Plan Viability Assessment (**EB-IV2**).

11.4.7 The viability appraisal includes an allowance for the impact of policy costs, including an allowance of just over £500 per unit for the 20% requirement for accessible and adaptable homes as set out in Policy LC4 of the Local Plan (Paragraph's 4.62 & 4.63 of the WPVA) (**EB-IV2a**). This cost is based upon the recommendations of the Housing Standards Review: Cost Impact Report by EC Harris. However, as the WPVA refers at paragraph 3.87 (**EB-IV2a**), it is considered that the cost impact associated with this policy requirement is *de minimis*.

11.4.8 The Council therefore considers the requirement for 20% of dwellings on major housing sites to be provided as accessible and adaptable homes is justified from both a viability perspective, as well as the demonstration of need.

11.4.9 The policy requirement in the Publication Draft Local Plan, requires the percentage of accessible and adaptable homes for development proposals of 10 or more dwellings. This is however slightly inconsistent with National Planning Practice Guidance (Paragraph: 031 Reference ID: 23b-031-20161116), which states that contributions should not be sought from developments of 10-units or less, and which have a maximum combined gross floorspace of no more than 1,000 square metres (gross internal area). Therefore the Council propose to change the wording of the Policy LC4 to reflect this.

11.4.10 Part 4 of the policy is also considered soundly based and flexible. Due to the current low demand on the Self and Custom Build Register, the Council is not requiring the inclusion of self and custom build dwellings. At the time of writing this Hearing Statement (22/10/2018) there are 16 entries on the Register, two of which are not currently looking for land. However, the Government is keen to progress with the delivery of these types of dwellings and the Council has appointed a specific officer to encourage the development of more self and custom build homes. It is therefore considered appropriate to include reference to this type of housing in the policy.

Issue – Will the plan provide a 5 year supply of specific deliverable housing sites on adoption and is there a reasonable prospect that this will be maintained throughout the plan period?

Council Note - The Council has updated annual net completions 2014 – 2018 and projected completions for the relevant five year period 2018/19 to 2022/23 in the Five Year Housing Land Supply Statement 2018 (EB HOU8b).

Question 11.5

What is the estimated supply in the plan period 2014 – 2035 from:

- **Completions 2014 – 2018 (as at 31.3.18);**
- **Sites with planning permission for 10 or more dwellings (large sites);**
- **Sites with planning permission for less than 10 dwellings (small sites).**

(The Council should provide up to date figures from the most recent monitoring information in its response to this question)

Council Response:

- 11.5.1 The table below shows that the overall developable supply in the plan period from completions and permissions is 5,038 dwellings. These are made up of:
- 1,371 dwellings completions,
 - 381 deliverable dwellings on small sites and
 - 3,286 developable dwellings on large sites.

The information is derived from the Council's most recent monitoring data for 31st March 2018, as well as any permissions on larger sites up to 22/10/2018.

Completions 2014-2018	1,371	Housing Completions 2014-2017 are set out in the Housing Topic Paper, Appendix 1 (EB-HOU7) Housing Completions 2017-2018 are set out in the 2018 Housing Completions and Commitments Report (EB-HOU8c)
Small sites with permission at 31/03/2018 (minus 5% lapse rate)	381	All sites with planning permission at 31/03/2018 are set out in the 2018 Housing Completions and Commitments Report (EB-HOU8c). The overall permitted dwellings on minor sites is 429, which reduces to 407 dwellings when deducting 5% lapse rate. However, since then, minor corrections have been necessary to exclude ancillary dwellings and prevent double counting of replacement dwellings, decreasing the supply by 28 dwellings. Appendix 1 to this Hearing Statement includes the updated Commitments Report for sites with planning permission at 31/03/2018. The overall permitted dwellings on minor sites is therefore 401, which reduces to 381 dwellings when deducting 5% lapse rate.
Large developable sites with permission at 31/03/2018 - Not allocated	242	Appendix 2 to this Hearing Statement includes a list of these sites. 77 dwellings are in level 1 and 2 settlements; 165 dwellings in level 3 and 4 settlements, or countryside location
Large developable sites with permission at 31/03/2018 - Allocated	2797	This includes allocation sites SS4, EC2, EC3, KL3, KL5, KL6, GR1, HO1 (within Plan Period), HO2, HO3, HO4, NW1, NW2, PI1, SH1, ST1, ST2, TU1 (partially), TU2, TU3, SS3, WW1 and WW2 (partially)
Large sites with a resolution to grant permission, subject to S106, at 31/03/2018	47	This is allocation site CA1.
Large sites with planning permission between 01/04/2018 and 22/10/2018	200	This includes allocation sites MO1, SH2 and WW2 (partially)
Large Sites with planning permission TOTAL	3,286	
GRAND TOTAL	5,038	

Question 11.6

Is a 5% lapse rate for small sites justified and should a lapse rate be applied to large sites?

Council Response:

11.6.1 The Council considers the 5% lapse rate for small sites justified, based on past trends. Table 4.2 of the Housing Topic Paper (**EB-HOU7**) shows that the average lapse rate between 2012 and 2017 was 2.13%. Recent monitoring has found that the lapse rate for 2017/18 was 0.79%. This brings the average lapse rate between 2012 and 2018 to 1.86%, well below the Council's cautious 5%.

11.6.2 The lapse rate was applied to small sites for efficiency reasons, as there are a large number of small sites and the Council cannot check deliverability for each one of them. However for the large sites, the Council has considered the deliverability of each one, by contacting all landowners, promoters and/or developers of these sites to determine whether the sites were still available and achievable and when their delivery was expected to take place. These discussions also determined which large sites are not likely to come forward and lapse. These were therefore listed as undevelopable. As this process already establishes which large site is deliverable or developable, and which site is not, setting a lapse rate is not considered necessary.

11.6.3 Furthermore, the majority of large sites with permission have also been allocated and therefore even if they lapse, there is reasonable certainty that they would come forward in the plan period.

Question 11.7

What is the residual amount of housing that needs to be delivered to meet the housing requirement of 6600 dwellings over the plan period?

Council Response:

11.7.1 The residual amount of housing that needs to be delivered to meet the housing requirement of 6600 dwellings is **1,562 dwellings** (6600 – 5,038¹).

Question 11.8

Is the approach to discounting the following potential sources of supply for site allocations set out in the Housing Topic Paper justified? In particular:

- ***Sites in level 3 and 4 settlements;***
- ***Sites near neighbouring Districts (site at Hasland 160 dwellings);***
- ***Sites less than 10 dwellings (106 dwellings);***
- ***Sites where completions will take place after the plan period (815 dwellings).***

¹ Identified at the Council's response to Matter 11, Question 11.5

Council Response:

11.8.1 The Council considers the approach to discounting these potential sources of supply for site allocations is fully justified. Paragraphs 5.5 to 5.8 of the Housing Topic Paper (**EB-HOU7**) provides the reasoning for discounting these sites.

Sites in level 3 and 4 settlements

11.8.2 The Local Plan Strategy focuses development in the four main towns (level 1 settlements) and Settlements with good level of sustainability (level 2). The Local Plan does not propose to allocate development in level 3 and 4 settlements, due to their limited or very limited sustainability. The Council's response to Main Matter 5, Questions 5.1 to 5.5 includes the justification for the Local Plan Strategy approach.

11.8.3 Due to the Local Plan Strategy approach not proposing to allocate sites in level 3 and 4 settlements, a potential supply of 528 dwellings has not been considered further. 115 dwellings of these 528 dwellings already had planning permission in 2017.

Sites near neighbouring Districts:

11.8.4 The Local Plan aims to contribute to sustainable development by meeting development needs within North East Derbyshire's defined settlements, having regard to the settlement hierarchy (Policy SS1). Sites near neighbouring Districts are not providing sustainable development at a North East Derbyshire settlement. It is therefore justified to not include such sites within the potential supply for site allocations, unless the relevant neighbouring district asks North East Derbyshire District Council for help in accommodating some of their growth.

11.8.5 The site as Mansfield road, Hasland, for 160 dwellings has therefore been discounted from the potential supply. Neighbouring District, Chesterfield Borough Council has not asked NEDDC for help. Each authority in the Housing Market Area, including Chesterfield Borough Council, has formally agreed to seek to meet the identified objectively assessed housing need for their authority to ensure the overall objectively assessed housing need for the HMA is met within the HMA, as set out in the North Derbyshire and Bassetlaw Housing Market Area Joint Statement of Common Ground (**SD6**).

Sites less than 10 dwellings

11.8.6 Paragraph 5.7 of the Housing Topic Paper (**EB-HOU7**) explains that it is not considered efficient for the Local Plan to allocate sites below 10 dwellings, where these cannot be combined with other adjacent sites. Alternatively, these smaller sites can be allocated by communities through their Neighbourhood Plans.

11.8.7 The Council considers this approach justified, in particular since all these sites either have planning permission, or are located within the Settlement Development Limit where the overall principle of residential development is accepted.

11.8.8 An overall supply of 106 dwellings from small sites was identified in the Housing Topic Paper (**EB-HOU7**). Since then 27 dwellings have been constructed, leaving a potential supply of 79 dwellings.

Sites where completions will take place after the plan period

11.8.9 Some of the potential dwelling yield is tied up on larger sites which are not expected to come forward in their entirety within the Plan Period. The Avenue Strategic Site is an example. In particular large sites which haven't started on site yet, or don't have planning permission, such as the West of Chesterfield Road, Holmewood site and the Clay Cross South site, are highly unlikely to construct and sell all these homes by 2034. It is likely that some of this yield will come forward after the Plan Period. It would therefore be unrealistic to include these in the potential supply for site allocations within the Plan Period.

Question 11.9

Are the assumptions about dwellings on windfall sites justified and are there any policy changes which could change the rate of delivery in the future compared with historical rates?

Council Response:

11.9.1 Section 6.2 of the Housing Topic Paper (**EB-HOU7**) explains that historically, North East Derbyshire District has seen a consistently high number of small windfall developments. The Council's Housing Land Supply includes dwellings on small windfall sites with permission, which are expected to come forward within the next five years (from now), up to 2022/23².

11.9.2 However, future windfalls on small sites cannot be ignored. Table 6.2 of the Housing Topic Paper shows that the dwelling completions on small sites between 2011 and 2017 is 76 dwellings per annum. The completion on small windfall sites in 2017/18 is 111 dwellings, which would make the average dwelling completions on small windfall sites between 2011 and 2018 81 dwellings. Although large windfall sites are not anticipated, it is very likely that a similar level of small windfall sites as in the past will come forward. The Council therefore considers the assumption of 75 dwelling completions per annum on future small windfall sites justified.

11.9.3 It is not expected that there are any policy changes which could change the rate of delivery in the future compared with historical rates. North East Derbyshire has recorded similar historical rates going back to 1991, when there were different policy provisions in North East Derbyshire locally and England nationally, some of which were stricter than current policies. As explained in paragraph 6.9 of the Housing Topic Paper (**EB-HOU7**), the average (gross³) small windfall site completion rate between 2001 and 2011

² This is one year later than stated in paragraph 6.10 of the Housing Topic Paper (**EB-HOU7**), due to having moved to the next monitoring year. Small windfall sites completions for 2017/18 have been included in the overall completions report for 2017/18.

³ Net completion rates were not recorded at this time.

was 103 dw/yr, compared to 58.5 between 1991 and 2001. Therefore is very likely that these delivery rates will continue in the future, whichever policy changes will be introduced.

11.9.4 Large windfall sites are not expected to come forward, because it is considered that the Local Plan allocates sufficient sites to meet the requirement.

Question 11.10

Does the proposed supply of 6621 dwellings against a requirement of 6600 dwellings incorporate a sufficient 'buffer' to allow for non-delivery as well as providing choice and flexibility in the supply of housing land?

Council Response:

11.10.1 The Council's response to Matter 11, Question 11.5 sets out that the estimated supply from completions and sites with planning permission is 5,038 dwellings. In addition to this, the Council has allocated sites on Green Belt land, with a yield of 1266 dwellings and sites on non-Green Belt land without planning permission, with a yield of 390 dwellings. This is a total of 1,656 dwellings. This brings the overall proposed supply to 6693 dwellings (5,038 + 1,656) against a requirement of 6600 dwellings.

11.10.2 The Council does not suggest that the oversupply of 93 dwellings alone is a sufficient buffer to allow for non-delivery as well as providing choice and flexibility in the supply of housing land. The Council has explained in paragraph 6.8 of the Housing Topic Paper (**EB-HOU7**) that determining the appropriate level of flexibility in the supply of housing land requires careful balance. On the one hand the risks associated with under-supply need to be understood and mitigated (some consultation responses suggest a 20% flexibility 'buffer'); and on the other hand the impacts of the proposed Green Belt release need to be justified in the context of the exceptional circumstances test.

11.10.3 The considerations of the level of flexibility, as explained in section 6.3 of the Housing Topic Paper (**EB-HOU7**), has found it logical and reasonable to consider the anticipated future small windfall sites of 75 dw/yr as the Plan's flexibility. The Council's response to Matter 11, Question 11.9 above, explains that historically the Council has experienced a large completion rate on small windfall sites and that this trend is likely to continue.

11.10.4 Although the Council is not relying on these small future windfall sites to meet its housing requirements (other than those with planning permission), they do offer a buffer for non-delivery of allocated sites, as well as providing choice and flexibility of housing land. It is considered that this approach offers the most appropriate balance, recognising that the housing market will be subject to various fluctuations and some potential slippage over the Plan period, at the same time as avoiding further development in the Green Belt. The Council is however confident that the allocated sites will be delivered as set out in the revised housing trajectory.

11.10.5 The Council is including windfall sites with permission within its Housing Land Supply, up to 2022/23. The buffer offered by the small windfall sites starts in year 5 (2023/24), and would give an overall flexibility of 825 dwellings (75 x 11 remaining years). This together with the 93 dwellings oversupply, identified above, provides a 13% buffer in relation to the overall housing requirement of 6600 dwellings.

Question 11.11

Should an additional buffer of 5% or 20% be added to the five year housing land supply to significantly boost supply as required by the NPPF?

Council Response:

11.11.1 Paragraph 47 of 2012 NPPF requires an additional buffer of 5% (moved forward from later in the plan period) to be added to the five year housing land requirement to ensure choice and competition in the housing market. Where there has been a record of persistent under delivery of housing, the buffer is increased to 20% (moved forward from later in the plan period) to provide a realistic prospect of achieving the planned supply and to ensure choice and competition in the market for land.

11.11.2 The Council’s response to Matter 11, Question 11.5 shows 1,371 completions between 2014 and 2018. The table below provides a breakdown of these completions per year since 2014 against the annual requirement of 330 dwellings. Completions in the first and third year fall short of the target, whereas the second and fourth years see a substantial oversupply. This gives a combined oversupply of 51 dwellings for the past 4 years. In light of this there is no past under delivery to reconcile and it is considered that a 5% buffer should be applied to the five year housing land supply calculation.

	Completions	Requirement	Under/Oversupply
2014/15	262	330	-68
2015/16	431	330	+101
2016/17	282	330	-48
2017/18	396	330	+66
TOTAL	1371	1320	+51

11.11.3 Paragraph 5.9 of the Publication Draft Local Plan, although still referring to an undersupply between 2014 and 2017, explains that the Council considers the persistent undersupply on a three year rolling average. If a five year supply of deliverable sites does not continue to be significantly available in these three years, the allocations in the Plan will be reviewed.

Question 11.12

Based on a requirement of 330 dwellings per year, would the plan help to ensure a 5 year supply of deliverable sites over the plan period? Is the trajectory set out at Appendix B of the plan realistic and deliverable? Are the assumptions for start dates and rates of delivery on each site appropriate and justified?

(In responding to this question, the council should provide a worked table of the 5 year requirement based on 330 dwellings per year and the deliverable 5 year supply position against the 5 year requirement)

Council Response:

11.12.1 Appendix 7 of the Housing Topic Paper (**EB-HOU7**) includes the five year housing land statement, after the adoption of the Local Plan. Due to further monitoring, the Council has updated the statement. The updated five year housing land supply statement after adoption is included at **Appendix 3** to this Hearing Statement. It shows a housing land supply of 5.44 years at adoption, showing that the Plan helps to ensure a 5 year supply of deliverable sites at adoption.

11.12.2 The table below sets out the Council's response to the Inspector's request for a worked table of the 5 year supply position against the 5 year requirement. The table sets out the requirement for each year including the 5% buffer, the supply in the following five years, and the resulting years of supply.

Date	Under-supply	Requirement (330 x 5yrs) + undersupply + 5%	Supply years	Supply	Years (Supply÷ Requirement)5
Current Year: 01/04/2018	0	1733	2018/19 – 2022/23	1975	5.70
Yr1: 01/04/2019	0	1733	2019/20 – 2023/24	1886	5.44
Yr2: 01/04/2020	0	1733	2020/21 – 2024/25	1801	5.20
Yr 3: 01/04/2021	0	1733	2021/22 – 2025/26	1785	5.15
Yr 4: 01/04/2022	0	1733	2022/23 – 2026/27	1771	5.11
Yr 5: 01/04/2023	0	1733	2023/24 – 2027/28	1720	4.96
Yr 6: 01/04/2024	13	1746	2024/25 – 2028/29	1702	4.88
Yr 7:01/04/2025	44	1778	2025/26 – 2029/30	1607	4.52
Yr 8: 01/04/2026	171	1912	2026/27 – 2030/31	1477	3.86
Yr 9: 01/04/2027	435	2190	2027/28 – 2031/32	1422	3.25
Yr 10: 01/04/2028	768	2539	2028/29 - 2032/33	1354	2.67
Yr 11: 01/04/2029 ⁴	1185	2976	2029/30 – 2033/34	1298	2.18

⁴ The worked table cannot show the supply position beyond year 11, because the future five years from year 12 onwards would need anticipated delivery information from

11.12.3 The table shows that the Local Plan will also help to ensure a 5 year supply of deliverable supply in the first four years after adoption. However at year five (01/04/2023) the future supply will be just below 5 years, at 4.96 years. One reason for this is that the small windfalls are not included in the supply from year 5 onwards, as they do not have planning permission at this stage. The Revised Housing Trajectory, submitted as an Examination Document (**ED18**), clearly shows this in the second from bottom row. The Council only counts these small future windfall sites as flexibility, as explained at the Council's response to Main Matter 11, Question 11.10, rather than as part of the supply to meet the 6600 dwelling requirement. It is however very likely that these small windfalls may boost the supply to five years in year 5 and 6, because the difference between the supply and requirement is minimal in these years (eg Year 5: requirement 1733 and supply 1720 dwellings).

11.12.4 From year 7 onwards, it will be more difficult for the Council to show a future five year housing land supply. At this year, the five year housing land supply includes the projected delivery from years 11 onwards within the calculations⁵. The revised housing trajectory shows that the Local Plan allocations would deliver fewer than 330 dwellings per year from year 11 (2029/30) onwards. The five year housing land supply calculations, which includes these lower projected delivery years, will therefore not be able to show a five year supply. The lower delivery rates in the later years of the Plan Period are explained by the fact that the majority of supply which makes up the Plan's requirement already has planning permission, resulting in a large amount of dwellings to be built early in the Plan Period. For example, out of the 39 allocation sites in the Publication Draft Local Plan, two were built out last year (2017/18) and another 13 have started on site, some nearing site completion. Because of the permissions, the Council cannot apply policy measures, such as phasing, to remedy the shortfall. Additionally, the size of the residual amount of housing without planning permission is too low to cover the later years sufficiently.

11.12.5 The Council has revised the trajectory set out in Appendix B of the Publication Draft Local Plan in light of further monitoring work. The Revised Housing Trajectory has been submitted as an Examination Document (**ED18**) alongside the Council's Hearing Statements.

beyond the Plan Period (ie the future supply at year 11 is from 2029/30 to 2033/34; at year 12 it would be from 2030/31 to 2034/35). Delivery information from beyond the Plan Period is not currently available.

⁵ For example the five year housing land supply calculation in year 7 will include the supply from years 7 to 11; the calculation in year 8 will include the supply from years 8 to 12, etc.

- 11.12.6 The revised Housing Trajectory is considered the most realistic and deliverable trajectory. It shows delivery of the majority of sites with planning permission in the first five years, unless the site is so large that it cannot all be delivered within the first five years, such as the Strategic Sites. Delivery on the small sites has simply been averaged over 5 years from the current year 2018/19.
- 11.12.7 Delivery on sites to be released from the Green Belt at Dronfield Eckington and Killamarsh is generally expected between years 5 and 10 after adoption. These settlements have seen limited development in the recent years⁶, as a result of Green Belt and capacity constraints, and therefore demand is likely to be high. Developers are confident that delivery on these sites will be achieved quickly, indicating that the first completions on site can come forward in year 2 or 3 after adoption of the Local Plan. The Council has taken a more cautious approach, as explained below, and includes the first year completions in year 5. Years 11 to 15, would only see the remaining completions on larger sites and the few sites which haven't progressed as quickly.
- 11.12.8 The Council's response to Matter 10, Question 10.1c, includes the detailed delivery considerations for the individual allocation sites. **Appendix 2** to this Statement includes the detailed delivery considerations for the large sites with planning permission which have not been allocated. Their deliverability was assessed by contacting all landowners, promoters and/or developers of these sites ('the site promoters') to determine whether the sites were still available and achievable, and when their delivery was expected to take place.
- 11.12.9 Discussions were held with the site promoters to determine the likely build out rates, lead-in times and number of housebuilders on site. Although the Council generally followed the site promoters' information, based on their knowledge and experience of the individual site; where site promoters quoted overly ambitious build out rates and/or delivery timeframes, the Council applied some level of realism and amended the rates and timings suggested. Wherever possible this was discussed with the site promoters. The Statements of Common Ground with site promoters of allocation sites show where the Council and the site promoter are in disagreement over delivery timescales. In general the Council takes a more cautious approach.
- 11.12.10 The judgements made were generally based on build out rates of 35 dwellings per year per site. This was based on the assumed absorption rates stated in paragraph 4.69 of the Whole Plan Viability Assessment (**EB-IV2**).

⁶ Tables 2.1 and 2.2 of the Housing Capacity Study for the Northern Settlements (EB-HOU9) show that the annual completion rate at Dronfield, Eckington, Killamarsh and Renishaw was 106 dwellings per annum, compared to only 37 between 2011 and 2017.

For larger sites of more than 400 dwellings, where more than one developer may be expected to be involved, the assumed rate of delivery was increased to up to 70 dwellings per annum.

11.12.11 The Council also considered a general approach to lead-in times from permission to first year completions, predicting that the first year of dwelling completions on site is 4 years after a full permission (for example, full permission granted in 2017/18 would see its first year completions at the end of 2020/21). This was considered to be 3 years after a Reserved Matters permission and 5 years after an outline permission. This generally reflects the outcome of the Report 'The Role of Land Pipelines in the UK Housebuilding Process', September 2017, commissioned by Barratt Developments Plc, prepared by Chamberlain Walker Economics⁷, which suggests for a detailed planning permission 21 months from planning permission to start on site and 27 months from start on site to the end of the first year of completion (ie 4 years in total).

11.12.12 For Green Belt sites, it was estimated that a planning application would be submitted within the first year after adoption and that the first completion on site would take place three years after the permission (ie end of first year completion to be four years after permission).

11.12.13 The Council considers that this a robust and reliable approach, being based on detailed site information from site promoters, whilst ensuring this information is realistic by comparing them to general assumptions on build rates and lead-in times.

Issue – Are other housing policies soundly based?

Question 11.13

The following questions apply to Policies LC5, LC6 & LC7:

- a. Is the policy clear and justified and will it provide sufficient guidance for decision making?**
- b. How will the policy be implemented and would it be flexible to respond to specific circumstances including viability?**
- c. Is the policy consistent with national policy?**

Council's Response:

11.13.1 The table below provides the Council's response to Questions a, b and c for policies LC5, LC6 and LC7.

⁷ https://cweconomics.co.uk/wp-content/uploads/2017/10/CWEconomicsReport_Land_Banking.pdf

Policy	a) Is the Policy clear and justified and will it provide sufficient guidance for decision making?	b) How will the policy be implemented and would it be flexible to respond to specific circumstances including viability?	c) Is the policy consistent with national policy?
<p>Policy LC5: Residential Extensions</p>	<p>Additional space created by an extension to a dwelling and the erection or alteration to outbuildings are recognised as acceptable means of meeting changes in household space requirements.</p> <p>Policy LC5 sets out clear and sufficient Development Management guidance against which proposals for residential extensions can be assessed, to ensure that these proposals do not adversely impact on character and appearance of the area and the neighbours' privacy and amenity.</p>	<p>The policy will be implemented through the determination of planning applications as and when they are submitted through the development management process.</p> <p>The criteria included within the policy allows for a degree of flexibility, in that it does not restrict sustainable development, or development proposals for residential extensions from coming forward or being approved, with it instead setting out criteria which ensure the proposals are appropriate, and are not detrimental to the local area or existing property.</p> <p>The Council's Whole Plan Viability Assessment (EB-IV2a) found that this policy was not considered relevant from a viability point of view, in terms of having a direct financial impact upon development</p>	<p>The Council considers policy LC5 is consistent with the NPPF. Paragraph 58 of the NPPF states that Local Plans should develop robust and comprehensive policies that set out the quality of development that will be expected for the area, including through ensuring that developments respond to local character and history, and reflect the identity of local surroundings.</p> <p>LC5 is consistent with this, in how it sets out deliverable and justified criteria which allows for extensions and alterations to dwellings or outbuildings which are ancillary to the main residential use, so long as proposals are not inappropriate and do not impact negatively upon the character of the existing property, the local area, or the neighbouring properties.</p>

Policy	a) Is the Policy clear and justified and will it provide sufficient guidance for decision making?	b) How will the policy be implemented and would it be flexible to respond to specific circumstances including viability?	c) Is the policy consistent with national policy?
<p>Policy LC6: Agricultural, Forestry and Other Occupational Dwellings in the Countryside</p>	<p>Occasionally the nature of agricultural and other rural businesses make it essential for someone to live on, or in close proximity to the business.</p> <p>Policy LC6 sets out clear and sufficient Development Management guidance against which proposals for agricultural, forestry and other occupational dwellings in the countryside can be assessed, to ensure that such dwellings are commensurate with the needs to the holding.</p>	<p>The policy will be implemented through the determination of planning applications as and when they are submitted through the development management process.</p> <p>The criteria included within the policy allow for a degree of flexibility which do not restrict agricultural, forestry and other occupational dwellings from being permitted in the countryside, but ensure that they serve a genuine need.</p> <p>The Council's Whole Plan Viability Assessment (EB-IV2a) found that this policy was not considered relevant from a viability point of view, in terms of having a direct financial impact upon development</p>	<p>The Council considers that policy LC6 is consistent with the NPPF. Paragraph 55 of the NPPF (2012) explains that to promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. New isolated homes in the countryside should however be avoided, unless specific circumstances are met, such as the essential need for a rural worker to live permanently at or near their place of work in the countryside.</p> <p>Policy LC6 is consistent with this paragraph in the NPPF in that it sets out criteria which allows for new dwellings in the countryside, where there is an essential need, one which can be proven through meeting the criteria in this policy.</p>

Policy	a) Is the Policy clear and justified and will it provide sufficient guidance for decision making?	b) How will the policy be implemented and would it be flexible to respond to specific circumstances including viability?	c) Is the policy consistent with national policy?
<p>Policy LC7: Removal of Agricultural and Other Occupancy Conditions</p>	<p>It is accepted that there may be circumstances where agricultural, forestry or other occupational dwellings in the countryside are no longer required for the purpose for which they were originally intended.</p> <p>Policy LC7 sets out clear and sufficient Development Management guidance against which proposals which seek the removal of agricultural and other occupancy conditions can be assessed, to ensure that the need for which the dwelling was originally approved no longer exists.</p>	<p>The policy will be implemented through the determination of planning applications as and when they are submitted through the development management process.</p> <p>The criteria included within the policy allows for a degree of flexibility to evidence that the need for the agricultural, forestry or other occupational dwelling no longer exists.</p> <p>The Council's Whole Plan Viability Assessment (EB-IV2a) found that this policy was not considered relevant from a viability point of view, in terms of having a direct financial impact upon development.</p>	<p>Although paragraph 55 of the NPPF (2012) states that new isolated homes in the countryside should be avoided, unless specific circumstances such as the essential need for a rural worker to live permanently at or near their place of work in the countryside are met, the Council also believes the NPPF would wish to avoid any dwellings becoming vacant due to occupancy constrictions.</p>

Appendix 1

Updated Housing commitments at 31/03/2018

Revised at 22/10/2018

See separate attachement

Appendix 2:

Large sites with permission at 31/03/2018 – not allocated

Housing Trajectory

Permission reference	site address	Overall yield	Completed in 2017/18	Undeliverable	Deliverable Yield in Year 1	Adoption year 2018/19	Year 1 2019/20	Year 2 2020/21	Year 3 2021/22	Year 4 2022/23	Year 5 2023/24
17/00200/OL	Land South West of Grange Farm, Milken Lane, Ashover	10			10				10		
17/00841/RM	Land at the Junction of Narrowleys Lane And, Moor Road, Ashover	26			26		13	13			
16/01236/RM	Land to the East and North of 119 Top Road, Calow	10			10	2	8				
16/01251/FL	Former Danesmoor County Infant School, Pilsley Road, Clay Cross	28		28							
15/00383/OL	83A Clay Lane, Clay Cross	10			10	6	4				
17/00751/FL	NEDDC Area Housing Office, High Street, Dronfield	10			10				10		
14/01100/FL	Land to the rear of 2 to 6 Westhill Lane, Grassmoor	11			11	5	6				
16/00724/OL	Mile Hill House, Mansfield Road, Hasland	10			10					10	
16/00524/RM	The Woolpack, 26 Town End, Higham	14	4		10	10					
16/01302/FL	Fanny Avenue, Killamarsh	26			26	26					
17/01322/FL	Manor Farm, Uppertorpe Road, Killamarsh	10			10					10	
16/00276/OL	Land between Poplar Grove and Park House Farm, Pilsley Road, Lower Pilsley	16			16				6	8	2
16/00665/	Land between Locko Road, Lower Pilsley	13			13	3	6	4			
14/00249/OL	Land to the East of Prospect House Highstairs Lane Stretton	31		3	28				12	16	
15/01083/RM	Land North West of 24 Matlock Road, Wessington	32	23		9	9					
18/00461/FL	Land North and West of Creg Ny Baa Brackenfield Lane Wessington	43			43		15	20	8		
TOTAL		300	27	31	242	61	52	37	46	44	2

Deliverability considerations:

17/00200/OL - Land South West of Grange Farm, Milken Lane, Ashover

Outline Permission for the construction of 10 bungalows to wheelchair user standard M4(3) was granted in June 2017.

Discussions took place with the site's agent, Planning and Design Practice, in May and August 2018 regarding the timeframes for delivery. The landowner was in the process of selling the site to a local house builder. The local house builder has instructed Planning and Design Practice to prepare a Reserved Matters application on his behalf, to be submitted shortly. The agent indicated that work has been undertaken in relation to discharging conditions on the permissions and he is currently waiting for a response from the builder on the layout of the scheme. They are still intending to go ahead with 10 wheelchair accessible dwellings and do not foresee viability issues (Ashover is a higher value area). They hope to submit RM application shortly to ensure a start on site early 2019, with an expected completion on site in 2020/21.

There are no covenants on site.

The Council included the expected completion of 10 dwellings in 2020/21 in the 2018 five year housing land supply statement. However, since the Reserved Matters application has not been submitted yet as expected, the Council has moved the expected completion of 10 dwellings to 2021/22 in the Revised Trajectory supporting the Local Plan.

17/00841/RM - Land at the Junction of Narrowleys Lane And, Moor Road, Ashover Reserved Matters permission was granted for 26 dwellings in March 2018.

An application to discharge a condition is currently pending, relating to condition 5 of the outline planning permission regarding the assessment of contamination risk (18/00114/DISCON)

Discussion took place with Daren Atkinson the landowner/builder in May 2018, regarding the timeframes for delivery on the site. Discussions indicated that construction is likely to begin in 2018/2019 and for all 26 units to be completed by 2019/2020.

The Council included the expected completion of 26 dwellings in 2019/20 in the 2018 five year housing land supply statement. However, due to slower than expected start on site, the Council has changed the expected completion to 13 dwellings in 2019/20 and 13 dwellings in 2020/21 in the Revised Trajectory supporting the Local Plan.

16/01236/RM - Land to the East and North of 119 Top Road, Calow

Full permission was granted in February 2018 for 10 dwellings with associated access roads and landscaping. This permission forms an extension to the in 2017/18 completed development of 20 dwellings (16/01236/RM).

Discussions with Dean Trowbridge, Woodall Homes in May 2018 regarding the timeframes for delivery, indicated that construction on the site will likely begin in August 2018. Ground works are expected to take 6 months, resulting in the first 2 units coming forward towards the end of 2018/2019 and the remaining 8 units coming forward in 2019/2020.

16/01251/FL - Former Danesmoor County Infant School, Pilsley Road, Clay Cross
Full permission was granted in February 2018 for 28 New Dwellings (2no. 2bedroom Apartments, 12no. 2 bedroom houses, 14no. 3 bedroom houses); access road and car parking.

Discussions with Sarah Morris, the Corporate Landlord for Derbyshire County Council, the landowner, in May 2018, regarding timeframes for delivery indicate an intention to sell the site to a house builder within the next 12 months, in anticipation that 28 units will be completed by the end of 2021/22. This was included in the 2018 five year housing supply statement.

However, since this was published, Derbyshire County Council as landowner has indicated that they are considering the site as a way of providing more school places, and therefore the site is not currently available.

15/00383/OL - 83A Clay Lane, Clay Cross

Outline permission for 10 bungalows. A second Outline permission was permitted to alter the wording of condition 20 (prior to the occupation of the first dwelling) of the first Outline permission. The Reserved Matters application was granted planning permission on 21st June 2018.

Discussions with Eric Campbell, MD Campbell Homes, in May 2018 indicated that after the Reserved Matters was approved, work would start on site in summer 2018. Delivery of the first six units is expected to come forward within 2018/19 and the remaining four units in 2019/20.

All conditions have been discharged in July 2018.

17/00751/FL - NEDDC Area Housing Office, High Street, Dronfield

Full permission was granted in December 2017 for the conversion of existing area housing office buildings into residential dwellings (6) and the development of 4 no. new dwellings on associated car park.

In May 2018 discussions were held with Niall Clarke at Rykneld Homes. Discussions indicated that he is working up options for the delivery of the homes, with an expected start on site in 2018 and completion of all 10 units in 2019/20. This was included in the 2018 five year housing supply statement.

However, this may now have been an overestimated start and the Council has changed the expected completion to 10 dwellings in 2021/22 in the Revised Trajectory supporting the Local Plan.

14/01100/FL - Land to the rear of 2 to 6 Westhill Lane, Grassmoor

Proposed development of 11 no. residential units was allowed on appeal in October 2015. This is an exception site for Affordable Housing within the Green Belt.

In May 2018 discussion took place with Karl Drabble, South Yorkshire Housing Association, project manager for the scheme. Builders have been contracted and construction is likely to start in 2019/2020. This was included in the 2018 five year housing supply statement.

However, a site visit in September has indicated that they have made a start on site earlier than expected. The Council has therefore changed the expected completion to 5 dwellings in 2018/19 and 6 dwellings in 2019/20 in the Revised Trajectory supporting the Local Plan.

16/00724/OL - Mile Hill House, Mansfield Road, Hasland

Outline permission for up to 10 dwellings was granted in September 2016.

Discussion with the landowner, Chris Browne, regarding the timeframes for delivery, in May 2018, indicated that the site is in the process of being sold to a housebuilder, who will submit a reserved matters application shortly. The development is likely to be completed in 2022/23.

Progress is being made in resolving issues such as drainage.

16/00524/RM - The Woolpack, 26 Town End, Higham

Reserved matters permission for access appearance landscaping layout and scale for redevelopment of former Woolpack Public House and land adjacent to provide 14 dwellings.

Construction on this site has started and 4 units have been completed in 2017/2018. The remaining 10 dwellings are expected to all come forward in 2018/2019.

16/01302/FL - Fanny Avenue, Killamarsh

Permission for the erection of 26 dwellings (comprising 1 and 2 bed bungalows and 2 and 3 bed houses) was granted in November 2017. This is an exception site for Affordable Housing within the Green Belt. In April 2018, 14 units were under construction.

Discussion regarding timeframes for delivery took place in May 2018 with Catherine Squire, Halsall Lloyd Partnership Design, the agent for the housebuilder, GEDA Construction, who indicated that all 26 units are expected to be completed by the end of March 2019.

A full planning application is currently pending (18/00693/FL) for another 2 dwellings on the site.

17/01322/FL - Manor Farm, Uppertorpe Road, Killamarsh

Full permission was granted for residential development of 10 dwellings in December 2015. Since, applications have been approved to remove condition 17 and variation of condition 2 (17/00375/FL), as well as vary conditions 2,3,5,7 and 11 to allow amendment to site layout and removal of garages to be replaced with car ports on plots 1,2,3 and 5 and change hours of construction works and deliveries (17/01322/FL). The latest permission was granted in March 2018.

Discussions with Nick Taylor, the agent for the developer of the site, Meridien Homes, regarding the timeframes for delivery took place in May 2018. Discussion indicated that construction would begin in 2021, with all 10 units coming forward in 2022/23.

16/00276/OL - Land between Poplar Grove and Park House Farm, Pilsley Road, Lower Pilsley

Outline permission for residential development (maximum of 16 dwellings) was granted in November 2016.

In May 2018 discussion took place with Ross Cooper, Poplar Farm Developments, regarding the timeframes of delivery. Discussions indicated that a reserved matters application will be submitted shortly and that construction is expected to start in the third quarter of 2019 with delivery taking place over a period of 18 months. Completions were included in the 2018 five year housing supply statement in 2019/20 and 2020/21.

Further contact in August indicated that they will be submitting a planning application shortly, accompanied by a Viability Appraisal to show that the S106 payments agreed as part of the outline permission are not viable. Further likely timescales indicate a possible start on site early 2021, seeing 6 dwellings completions in 2021/22, 8 in 2022/23 and 2 in 2023/24.

16/00665/ - Land between Locko Road, Lower Pilsley

Full permission for residential development of 13 houses was allowed on appeal in June 2017.

All conditions have been discharged in July 2018.

In May 2018 discussion took place with Ross Cooper, Poplar Farm Developments, regarding the timeframes of delivery. Discussions indicated that construction is due to start on site in summer 2018 and that the delivery of the first houses is expected early 2019, with the scheme taking 18 months to complete.

14/00249/OL - Land to the East of Prospect House Highstairs Lane Stretton

Outline permission for residential development (31 units) was granted in October 2014 and a subsequent application to vary condition 3 regarding the provision of affordable housing was approved in November 2015.

In November 2017 a Reserved Matter application for 28 dwellings (17/00768/RM) was refused by the Council, and subsequently appealed by housebuilder Wildgoose Homes.

The appeal was part allowed/ part dismissed on 22nd June 2018. The appeal was dismissed insofar as it relates to layout and landscaping. The appeal was allowed however insofar as it relates to scale and appearance.

Before the Appeal decision, a further Reserved Matters application (18/00226/RM) was refused on 6th June 2018, due to it representing dense overdevelopment, with the proposed dwellings, design and layout of the scheme not being in keeping with the character of the surrounding area.

A new Reserved Matters application (18/00812/RM) was received in August 2018.

In May 2018, discussion took place with Reuben Spears, Wildgoose Construction, regarding the time frames for delivery. Discussions indicated that the builder anticipates to be on site within next 12 months, delivering the first dwellings in 2019/20 and completing the construction within 15 months of this. This was included in the 2018 five year housing supply statement.

However, this may now have been an overestimated start and the Council has changed the expected completion to 12 dwellings in 2021/22 and 16 dwellings in 2022/23 in the Revised Trajectory supporting the Local Plan.

15/01083/RM - Land North West of 24 Matlock Road, Wessington

Reserved matters permission was granted for 32 dwellings.

23 dwellings have been completed on site in 2017/18.

Discussion took place with Dan Briscoe from Urban Designs, the agent for the housebuilder, Wildgoose Construction, regarding timeframes for delivery, indicating that the remaining nine units will be completed in 2018/2019.

18/00461/FL - Land North and West of Creg Ny Baa Brackenfield Lane Wessington

Full Permission has been granted for the demolition of existing dwelling and erection of 43 dwellings in July 2017.

In May 2018, the developer submitted a Section 73 application to vary condition 2 regarding Approved plans- House Types (18/00461/FL) which was approved, and an application to discharge conditions 3 (samples), 4 (Landscaping), 5 (Boundary Treatments), 10 (Construction Method Statement), 11 (Site Accommodation), 15 (Parking and manoeuvring), 16 (wheel cleaning) and 17 (Bin Storage) (18/00462/DISCON), which is still pending.

Discussion took place with Dominic Cooney, Planning and Design Practice, the agent for the developer, Meadowview Homes Ltd, in May 2018, regarding timeframes for delivery. Discussions indicated an anticipated delivery of 15 units within 2019/2020, 20 units in 2020/2021, and 8 units in 2021/2022.

Updated Five Year Housing Land Supply Statement, after Local Plan Adoption

1. The National Planning Policy Framework (NPPF) requires local planning authorities to identify and update annually a supply of specific deliverable sites, sufficient to provide five years' worth of housing against their housing requirements. To be considered deliverable, sites should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years, and in particular that development of the site is viable.
2. The NPPF also requires an additional buffer of 5% (moved forward from later in the plan period) to ensure choice and competition in the housing market. Where there has been a record of persistent under delivery of housing, the buffer is increased to 20% (moved forward from later in the plan period) to provide a realistic prospect of achieving the planned supply and to ensure choice and competition in the market for land.
3. In line with National Planning Policy Guidance (Paragraph: 031 Reference ID: 3-031-20140306), the annual requirement should be based on the emerging Local Plan target, as confirmed by population, household and economic projections. The Council's Local Plan target for housing is **330 dwellings per year**, which is used as the basis for calculating the Council's five year supply.
4. **Table 1** below shows the annual net completions since 2014 against the annual requirement of 330 dwellings. Completions in the first and third year fall short of the target, whereas the second and fourth years see a substantial oversupply. This gives a combined oversupply of 51 dwellings for the past 4 years. In light of this there is no past under delivery to reconcile, and it is considered that a 5% buffer should be applied to the five year housing land supply calculation.

Table 1: Annual Net Completions against OAN target

	Completions	Requirement	Under/Oversupply
2014/15	262	330	-68
2015/16	431	330	+101
2016/17	282	330	-48
2017/18	396	330	+66
TOTAL	1371	1320	+51

5. Government policy in relation to the supply of housing in the 5 year supply is that it should be 'deliverable' and 'developable' (NPPF, para.47). To be considered 'deliverable' sites should be available, in a suitable location, with a realistic prospect that housing will be delivered on the site within five years; and in particular that development of the site is viable.

6. In terms of future supply, the Council bases its projected future housing land supply on allocated sites in the Local Plan and sites with outstanding planning permission. The Housing trajectory shows the anticipated completion rates on the allocation sites (both with and without permission), as well as minor sites with planning permission on 31st March 2018, and major sites with permission on 31st March 2018 which are not allocated.
7. The assessment of 'deliverability' (availability and achievability) was carried out differently for major and minor sites with permission, due to the scale of the task involved. For **major sites with planning permission** at 31st March 2018, the Council has contacted all landowners and/or developers to determine whether these sites are still available and achievable, as well as the delivery timetables for these sites. Sites where contact could not be established have been marked as undeliverable. For the **minor sites with planning permission**, an average lapse rate of 5% (based on past trends⁸) was applied to all outstanding permissions. Overall there are 401 outstanding minor permissions, which reduces to 381 dwellings when the 5% lapse rate is applied. This gives an average projected completion rate of 76 dwellings per year over five years (and 77 dwellings at year 5), starting at 2018/19.
8. For **allocated sites without planning permission or planning permission after 31st March 2018**, the best available information was used, based on developer involvement, site clusters, 35 dwelling completions per year for sites over 50 dwellings, for sites of 50 dwellings or smaller completion to take place over two years, and assumed completion starts 4, 3 or 2 years after anticipated planning permissions, for outline, full and reserved matters permission respectively.
9. Adoption of the Local Plan is anticipated in 2019. Therefore it is considered that the monitoring year 2019/20 is the first year of the five year housing land supply after Adoption. However, annual completions have only been recorded up to March 2018 and there is therefore an intervening year 2018/19.
10. Table 2 shows that 437 dwellings are projected to be completed in 2018/19 (based on the methodology set out in paragraphs 7, 8 and 9 above and the housing trajectory), resulting in a projected oversupply of 107 dwellings. However, this is not confirmed through monitoring yet. Therefore, for the purpose of this version of the Local Plan five year supply statement, the intervening year of 2018/19 has been set aside as meeting the requirement, and the Council continuing without an undersupply.

Table 2: Projected completions against target, before Local Plan Adoption

Year (yr)	Projected Completion	Target	Under/ Oversupply
2018/19	437	330	+107

11. **Table 3** includes the projected completions for the five years from adoption of the Local Plan, 2019/20 to 2023/24, based on the methodology set out above and the housing trajectory. It shows that an annual over-supply is expected in all five years. The overall projected housing delivery for years 1 to 5 is 1886 dwellings, representing an oversupply of 236 dwellings in relation to the target. This reduces to 153 dwellings when applying the required 5% buffer.

⁸ The expiry rates on all permissions (major and minor) has been well below 5% since 2014.

Table 3: Five Year Supply: projected completions against target

Year (yr)	Projected Completion	Target	Under/ Oversupply
2019/20 (yr 1)	440	330	+110
2020/21 (yr 2)	371	330	+41
2021/22 (yr 3)	346	330	+16
2022/23 (yr 4)	381	330	+51
2023/24 (yr 5)	348	330	+18
TOTAL	1886	1650	+236

12. **Table 4** sets out the five year housing land requirement calculation and illustrates that in order to demonstrate that the Council has a 5 year supply it must have a deliverable supply of 1733 dwellings.

Table 4: Five Year Housing Land Requirement Calculation

a)	5 Yr Target (OAN x 5 years = Target)	330 x 5	1650
b)	Backlog/oversupply (from Table 1 and 2)	0	0
c)	Sub-total (a + b)	1650 + 0	1650
d)	5% buffer (on sub-total) (c x 5%)	1650 x 5%	83
e)	Total Requirement (c + d)	1650 + 83	1733

13. The following calculation gives the land supply position at the start of year 1 (April 2019) and demonstrates that the Council has a **5.44 year supply**.

$$(1886 \div 1733) \times 5 = 5.44$$

(Projected Completions {from Table 3} divided by the Total Requirement {from Table 4 [e] }) multiplied by 5 years