

Sunderland Local Plan Examination

Taylor Wimpey - Penshaw

Matter Statement 4 - Housing Land Supply

Issued May 2019

1.0 Components of Housing Supply

(1.1) Will the up to date housing supply position be clearly shown in the Plan (base date of 31 March 2019)?

1.1 This is considered a question for the Council to answer.

(1.2) Will the components of the housing supply that will meet the housing requirement be clearly shown in the Plan (Table 22 of the Compliance Statement refers)?

1.2 This is considered a question for the Council to answer.

(1.3) Is the small sites allowance of 50 dpa justified by compelling evidence?

1.3 N/A

(1.4) Is the flexibility factor of 8.5% sufficient to ensure that the housing requirement will be met over the Plan period?

1.4 It is common for Local Plans to identify a level of flexibility to ensure that the housing requirement will be met. This will help to ensure that Sunderland can meet their OAN rather than only identifying enough sites to just meet their OAN and potentially be in a position if some of these did not come forward as anticipated then there would be a shortfall against the identified requirement. This approach aligns with Government policy and objectives in terms of boosting the supply of housing and there is no harm if more homes are provided compared to the identified requirement.

(1.5) Is the allowance for demolitions of 20 units per year justified?

1.5 The allowance for 20 units per year for demolitions would seem reasonable. It is based on demolitions recorded in Sunderland over the last 10 years, discounting the large-scale demolitions undertaken by Gentoo. This approach would seem reasonable given the large-scale regeneration programme across Sunderland led by Gentoo are coming to an end. The SHLAA (2018) is clear that this would be monitored annually and adjusted if trends change.

2.0 The Housing Trajectory and HIS

(2.1) Is the data that supports the Housing Trajectory (Figure 34) based on realistic assumptions?

- 2.1 The housing trajectory in respect of Taylor Wimpey's site in Penshaw is based on realistic assumptions for future delivery. The Housing Trajectory for Taylor Wimpey's site has been identified in conjunction with the Council which gives weight to the reality of delivery.

(2.2) Will the HIS (when available) demonstrate that a five-year supply can be maintained through the plan period?

- 2.2 This is considered a question for the Council to answer.

3.0 Five Year Housing Land Supply

(3.1) Is the use of a 5% buffer to calculate the housing land supply position appropriate?

- 3.1 Paragraph 47 of NPPF (2012) sets out where a 5% or 20% buffer should be applied in respect of identifying future housing land supply; stating that where there has been persistent under-delivery of housing a 20% buffer should be applied.
- 3.2 The SHLAA (2018) states that over the last 3 years there has been a surplus of dwellings delivered (paragraph 63). However, based on completions data from MHCLG Table 253 over the past 10 years there has been a persistent under-supply of housing against identified housing requirements (it is noted completions between this data and Council completions does differ), whether this is based on the former Regional Strategy net additions target or the OAN identified for this current plan period. On this basis a 20% buffer would be appropriate to be applied in Sunderland.
- 3.3 However, the revised NPPF (2019) paragraph 73c states that a 20% buffer should be applied where there has been significant under delivery of housing in the previous three years. Footnote 39 provides additional clarity and states that from November 2018, this will be measure against the Housing Delivery Test, where this indicates that delivery was below 85% of the housing requirement.
- 3.4 Taking into account NPPF (2012) and the revised NPPF (2019) it would suggest a 5% is a reasonable and appropriate approach given the increased delivery which has been experienced in the last three years.

(3.2) Is the inclusion of 250 units from small sites justified taking into account the need to avoid double counting?

- 3.5 The SHLAA (2018) sets out that an allowance of 50 dpa has been made in respect of small sites, which are classified as being of 4 dwellings or less, as these sites are not identified through the SHLAA process. The SHLAA (2018) evidences this through data of small sites which have come forward over the last 5 years. The SHLAA (2018) is clear that small site delivery will be monitored annually and the allowance in future SHLAAs adjusted accordingly.

(3.3) Generally, are the assumptions about the delivery from commitments and allocations realistic taking into account past completions?

- 3.6 Taylor Wimpey has provided delivery assumptions for their site in Penshaw to the Council as part of the SHLAA process and therefore assumptions in respect of future delivery of their site is considered realistic.

(3.4) Are lead in times and build out rates realistic?

- 3.7 Taylor Wimpey has provided delivery assumptions for their site in Penshaw to the Council as part of the SHLAA process and therefore assumptions in respect of future delivery of their site are considered realistic.

(3.5) Will there be a five-year supply of deliverable housing sites on adoption of the LP?

- 4.0 This is considered a question for the Council to answer.

5.0 The wording of the Policy SP8**(4.1) Will Policy SP8 as worded be effective in ensuring the delivery of at least 745 dpa?**

- 5.1 Policy SP8 will be effective in delivering of at least 745dpa across Sunderland. Policy SP8 is supported by:
- The identification of a number of sites across Sunderland which will support delivery of the OAN with additional flexibility to allow for changes to assumptions in respect of future delivery;
 - The identification of Strategic and Housing Growth Areas to support and drive forward housing delivery in Sunderland over the Plan period; and
 - Policies which support the delivery of small sites, conversion and change of use properties and windfalls.
- 5.2 Policy SP8 is therefore supportive of the delivery of 745 dpa as a minimum housing requirement in Sunderland over the plan period. For clarity, whilst our Client supports the level of housing identified, as set out in the response to question 1.3 in Matter 3, we believe a higher housing requirement in Sunderland can be justified.

(4.2) Should the policy refer to measures that would be implemented in the event of under-delivery against the minimum target or does the Housing Delivery Test contained within the 2019 Framework provide sufficient safeguards in this respect?

- 5.3 Policy SP8 does not need to refer to measures that would be implemented in the event of under-delivery. The Housing Delivery Test (HDT) is a national policy which will be monitored and published annually and therefore no references are required within local planning policy.