



Sunderland Local Plan Examination

Story Homes and Mr Michael Ford - North of Usworth Hall

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 This is considered a question for the Council to answer.

(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 objectively assessed need (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 period 2007/08 to 2017/18, which range from 0 to 566 units per annum, with an average of 214 units per annum, discounting the large-scale demolitions undertaken by Gentoo. This approach would seem reasonable given the large-scale regeneration programme across Sunderland led by Gentoo is 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 Story Homes and Mr Michael Ford's (our Client) site north of Usworth Hall, Washington (HGA4) is based on realistic assumptions for future delivery. The Housing Trajectory for our Client'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 Strategic Housing Land Availability Assessment (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 the Ministry of Housing, Communities and Local Government (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 (2008) 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 (a net gain of 234 units between 2013/14 and 2017/18 – ranging from 34 units in 2013/14 to 58 units in 2017/18). 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 The SHLAA includes a delivery schedule at Appendix B for the Housing Growth Areas. The SHLAA (and CSDP) adopts a conservative approach anticipating that none of the HGAs will deliver within the first 5 years (2018-2023).
- 3.7 For HGA2, the SHLAA assumes that the site (60 dwellings) will deliver 30 homes in years 2024/25 and 30 homes 2025/26. Whilst our Client is satisfied that these delivery rates are realistic, there is a likelihood that the HGA2 site could deliver earlier in the plan period. Our client has also considered the scenario if the wider site (HGA2 together with the additional land currently identified under Policy SS3) comes forward, which is anticipated to be completed by the middle of the plan period.

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

- 3.8 Our Client has provided delivery assumptions for their site north of Usworth Hall (HGA4) 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?

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

4.0 The wording of the Policy SP8

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

- 4.1 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.
- 4.2 Policy SP8 is therefore supportive of the delivery of 745 dpa as a minimum housing requirement in Sunderland over the plan period.

(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?

- 4.3 Whilst the Housing Delivery Test (HDT) will mean that housing delivery is monitored and published annually, our Client would encourage additional flexibility in the Plan.

4.4 Policy SP8 or the supporting text could include the following additional text:

“At any point in the plan period where there is no longer a demonstrable supply of sites to fully meet the five year land requirement, sustainable housing sites, which are located entirely or partially within the Open Countryside, that would both make a positive contribution to the five year supply of housing land and be well related to existing settlements will be supported where these proposals comprise sustainable development and are consistent with relevant policies in the CSDP. Proposals that come forward under this mechanism should be of a scale that respects the physical size of the settlement.”

4.5 This additional text is an adapted version of a Main Modification (ref. MM08) to Scarborough Borough Local Plan Policy HC1. Following the examination of the Local Plan, during September 2016, Inspector William Fieldhouse proposed a similar modification in his report (paragraph 139) dated 9 February 2017.

4.6 Including the above text would ensure the CSDP is positively prepared and effective. The additional text should be included to ensure a positive approach to the consideration of housing proposals of a scale and in locations well related to the settlement hierarchy if at any time during the plan period the Council is unable to demonstrate a five year supply of deliverable housing sites.