

HARTLEPOOL LOCAL PLAN EXAMINATION

Matter 7 – Housing Land Supply

1. The following hearing statement is made for and on behalf of the Home Builders Federation. This statement responds to selected questions set out within Matter 7 of the Inspector's *Schedule of Matters, Issues and Questions* (exam ref: EX INS 15).
2. The Inspector's Issues and Questions are included in bold for ease of reference. The following responses should be read in conjunction with our comments upon the submission version of the Local Plan, dated 3rd February 2017. The HBF has also expressed a desire to participate in the examination hearing sessions.

Issue 1 – How does the Plan meet the full OAN for market and affordable housing in the housing market area, including identifying a supply of specific, deliverable sites sufficient to provide 5 years' worth of housing and a supply of specific, developable sites for housing for years 6-10 and where possible years 11-15 ? (NPPF, paragraph 47)

Q1 What is the up to date situation regarding completions to date in the plan period and what is the residual amount of housing that needs to be delivered?

3. The HBF considers this a matter for the Council to address.

Q2 Does the Plan, as submitted, set out a realistic range of land allocations for housing that would provide for:

(a) A supply of specific deliverable sites to meet the housing requirement for the five years from point of plan adoption?

(b) A supply of specific, developable sites or broad locations for years 6-10 from the point of plan adoption?

(c) For (a) and (b) what are the sources of supply and what assumptions have informed the scale and timing of supply and rates of delivery from these sources? [Are they realistic and supported by the evidence?]

4. The plan does, in theory, provide sufficient supply to meet the housing requirement over the plan period. There is, however, a very limited buffer of just 49 dwellings

over the proposed housing requirement (table 7, submitted plan). This is not considered sufficient to ensure that the plan requirement is met in full. A minor slippage or lack of delivery from one or more sites is likely to lead to under-delivery. On this basis we recommend a greater buffer is provided. We provide further details upon specific aspects of the supply in response to later questions.

Q3 What is the estimated total supply in the plan period from:

- i. existing planning permissions***
- ii. other commitments e.g. sites subject to S106***
- iii. allocated sites***
- iv. any other sites specifically identified***
- v. windfalls***

5. It is understood that the Council intends to provide an update upon these aspects prior to the commencement of the hearing sessions. At the time of writing this hearing statement this remained unpublished. The HBF will therefore reserve our position upon these matters and may wish to provide further comment.

Q4 What are the assumptions about the scale and timing of supply and rates of delivery from these various sources? Are these realistic? (Does the SHLAA establish realistic assumptions about the availability, suitability and deliverability and likely economic viability of housing sites? (NPPF paragraph 159)).

6. It is notable that the 2015 *Strategic Housing Land Availability Assessment* (SHLAA, exam ref: HLP06/4) anticipates significant levels of delivery from some sites (table 5). The HBF has not, however, undertaken a detailed assessment of each of the SHLAA sites and as such we would rely upon the input from the respective developers of the individual sites.

Q5 What are the potential sources of windfalls? Is there compelling evidence to justify the approach to making an allowance for future windfall sites? (NPPF paragraph 48)

7. The HBF understands that the Council is anticipating windfalls providing approximately 65 dwellings per annum. This is implicit within table 6 of the submitted plan. The 65dpa windfall allowance is based upon 50% replacement of demolitions taking place. The evidence to support this was not available at the time of writing. The HBF may therefore wish to provide further comments upon any subsequent evidence.

8. The 2015 SHLAA does not provide any compelling evidence to support a further windfall allowance. Indeed whilst it is recognised that they have arisen in Hartlepool;

“...in view of the number and scale of potential housing sites the steering group agreed that there was no need to include a windfall assessment in the SHLAA.”
(para. 3.37 SHLAA).

9. Due to the lack of compelling evidence no further allowance should be made.

Q6 Does the Council's five year supply of specific deliverable housing sites incorporate a suitable buffer, in accordance with the NPPF and PPG?

10. I refer to our response below.

Q7 Has there been a persistent under delivery of housing? In terms of a buffer for a five year supply, should this be 5% or 20% in relation to paragraph 47 of the NPPF?

11. Yes, until the last monitoring year the Council has been persistently under-delivered since at least 2004. The Council acknowledges this point within the submitted plan, paragraph 10.6 and table 7, and itself recommends a 20% buffer. It is also notable that the 2016 SHMA Addendum is seeking to address this under-delivery through the inclusion of 700 additional dwellings, over the plan period, to the housing requirement. The HBF agrees that a 20% buffer is required.

Q8 Should an allowance be made for non-implementation of permissions and if so, what is the evidence? Should any additional allowance be made for uncertainty over the supply from allocations and windfall?

12. Yes, ideally any non-implementation would be based upon detailed evidence provided by the Council. In the absence of such information it is recommended that a 10% allowance be included. A 10% lapse rate accords with a number of appeal decisions, notably Rothley (appeal reference: APP/X2410/A/13/2196928) and Honeybourne (APP/H1840/A/12/2171339).

13. The HBF has also persistently argued that a buffer of additional sites should be provided to ensure that housing requirement is delivered in full.

Q9 Is the Plan sufficiently clear on the basis on which the 5 year supply calculation should be made, including the 'Sedgefield' or 'Liverpool' approach?

14. The plan does not provide clarity upon this issue. However in the absence of any compelling and robust evidence to the contrary the Council should adhere to the principles set out in the PPG (ID 3-035). This would require the ‘Sedgefield’ method to be applied.

Q10 Should the annual housing requirement figure be staggered to reflect the focus on large strategic sites? (i.e. a lower figures in the early years of the plan period, increasing later?) Are the lead-in times and delivery rates for High Tunstall and Wynyard realistic?

15. No, this would simply put off meeting housing needs in the short-term. Furthermore this would be contrary to the Council’s submitted evidence. Table 7 of the submitted plan clearly indicates that the Council anticipates greater delivery during the early years of the plan period. This is illustrated below.

Table 1: Cumulative delivery over five year plan periods

Five year period	Cumulative trajectory (dwellings)
2016/17 to 2020/21	2,480
2021/22 to 2025/26	2,050
2026/27 to 2030/31	1,669
Total	6,199

Source: Table 7 Hartlepool Local Plan

16. In terms of lead-in times and delivery rates the HBF would defer to the information provided by the respective developers of the sites.

Q11 Should the Plan contain an appropriate Policy mechanism and indicators that would trigger plan-led corrective measures to ensure a deliverable supply of housing land should monitoring indicate there is an insufficient level of supply?

17. Yes, this is considered essential. The NPPF is clear that plans need to be flexible and able to adapt to changing conditions. Furthermore the Government’s Housing White Paper¹ suggests that a delivery test will be placed upon Local Planning Authorities. This will require action to be taken if delivery falls below 95% of the Council’s annual housing requirement. The inclusion of triggers within the plan should delivery fall below the housing trajectory would therefore be a pragmatic

¹ DCLG 2017: Fixing our broken housing market

response to this. The triggers could be used to release further sites or lead to a full or partial plan review.

Q12 In terms of monitoring Plan performance should the housing requirement to 2032 be presented in a table within the Plan in three five year phases (2016-21; 2021-26; 2026-31), with a clear numerical total of what is anticipated to be delivered in each of those phases and the annual average for each phase?

18. Whilst this may be useful, the HBF would not support a stepped housing requirement without justification not only of the supply but why need also varied over the relevant phases. Furthermore as illustrated in table 1 above the plan would need to be front-loaded based upon the submitted trajectory.

Q13 Should the Plan include an additional buffer for supply? Is this justified in light of the requirement exceeding the full OAN? Based on past-delivery rates would it be delivered?

19. Yes, a buffer of sites is considered essential to ensure that the Council meets its housing requirement in full. An additional buffer will provide flexibility and choice within the market. This will provide greater opportunity for the housing requirements to be met in full. We address this issue in more detail in paragraphs 45 and 46 of our comments upon the Publication version of the plan.

20. Whilst it is noted that the housing requirement exceeds the Council's assessment of OAN this does not mean it should not seek to meet this requirement in full. The plan is seeking to deliver a gross requirement of 409dpa. If this is not achieved the plan will fail. In this regard the flexibility provided by a buffer of sites will assist in achieving the requirement. The Inspector will also be aware of the 'housing delivery test' suggested in the Government's recent Housing White Paper². This will require action to be taken if delivery falls below 95% of the Council's annual housing requirement. The release of additional sites included in a buffer would appear to be a reasonable response if delivery were not being achieved.

21. The issue of past delivery whilst useful for context should not dictate future supply and delivery as to do so would essentially be a continuation of the current conditions of housing supply, which has led to the national housing crisis. The Government is committed to boosting the supply of housing, as such the Council, through a positively prepared plan should be seeking to do likewise.

² DCLG 2017: Fixing our broken housing market

Yours sincerely,

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