

Housing Land Supply Position as at 1 October 2014

1. The National Planning Policy Framework (NPPF) requires Local Planning Authorities (LPAs) to *identify and update annually a supply of specific deliverable sites sufficient to provide five years' worth of housing against their housing requirements*¹.
2. The purpose of this note is to update the District Council's five year housing land supply position to reflect the position as at 1 October 2014. This note concludes that the Council is unable to demonstrate a five year supply of deliverable housing land.
3. In updating the housing land supply position the Council has considered the outcomes of recent planning appeal decisions, the NPPF, the recent publication of Government's National Planning Policy Guidance (NPPG), the current status of the Lewes District Council (LDC) and South Downs National Park Authority (SDNPA) Joint Core Strategy, recent case law and legal advice.

Housing Requirement figure

4. The 1 April 2014 housing supply note outlined the reasons for changing the housing requirement figure used in the Council's calculation of its five year supply. Since 1 April 2014 the Council has submitted the Joint Core Strategy to the Secretary of State for Examination. However, as there are outstanding representations to the proposed housing target the relevant policies only carry limited weight at this time. In light of this, and paragraph 30² of the NPPG (housing and economic land assessment), it is still considered appropriate to use the objectively assessed need³ mid-range point of 9,800 units (490 p.a.) as the housing requirement figure for the purposes of establishing the five year supply for Lewes District.

Additional supply buffer

5. Paragraph 47 of the NPPF states that LPAs must include an additional 5% buffer against their housing requirements to ensure choice and competition in the market for land. This additional percentage buffer increases to 20% where LPAs have a record of persistent under delivery of housing.
6. A 5% buffer is applied in the Council's five year calculation as it is considered that there has not been a persistent under delivery against the SEP target (*see table below*).

Year	Net completions	Annualised Target
2006/ 07	296	220
2007/ 08	416	216
2008/ 09	257	205

¹ Paragraph 47 of NPPF

² Expresses caution in using out of date evidence from revoked regional strategies and states that where emerging plans are not capable of carrying sufficient weight the latest full assessment of housing needs should be considered. (http://planningguidance.planningportal.gov.uk/blog/guidance/housing-and-economic-land-availability-assessment/stage-5-final-evidence-base/#paragraph_030).

³ Joint Sussex Coast Housing Market Authorities Housing Study calculates Lewes district's objectively assessed need is to be between 9,200 and 10,400 units between 2011/12 and 2030/31 (460 and 520 units per annum respectively).

2009/ 10	175	202
2010/ 11	161	204
2011/ 12	247	206
2012/ 13	218	203
2013/ 14	113	202
Total	1,883	-

Housing Land Supply - Commitments

Planning permissions

7. Large and small sites benefitting from planning permission, as at 1 October 2014, and which are expected to contribute completions within the next five years are included in the five year housing supply calculation. As at 1 October 2014 there were 785 net units with outstanding permission on large sites (6 units or more) and approximately 125 net units with outstanding permission on small sites (5 units or less). Small site permissions include a 35% discount to allow for non-implementation of permissions⁴.
8. As at 1 October 2014 seven sites had a resolution to approve subject to Section 106 legal agreement sign off. At the time of preparing this note, four out of the seven sites were considered deliverable and as such could be included in the five year housing supply calculation. These sites total 107 net units.

Other Deliverable sites

9. In addition to the above, three further deliverable sites, in line with footnote 11 of the NPPF, have been identified and as such are considered to contribute to the Council's five year housing supply. These additional sites are made up of one unimplemented 2003 Local Plan allocation (40 units) and two sites where the principle of residential development has been accepted through recent planning decisions and are identified in the Strategic Housing Land Availability Assessment (SHLAA) as deliverable (total of 79 units).

Windfall Allowance

10. Paragraph 48 of the NPPF allows LPAs to include an allowance for windfalls in the five year supply so long as it can be demonstrated that windfalls have been, and will continue to be, a reliable source of supply. It also states that any allowance should be realistic having regard to the Strategic Housing Land Availability Assessment, historic windfall and expected future trends, and should not include residential gardens. In considering historic rates of small site completions⁵ an allowance of 37 units p.a. has been included in the five year supply calculation.

⁴ The 35% discount has been calculated by looking at the pattern of individual small site permissions and completions to determine the proportion of small site permissions which were never implemented.

⁵ Only small site completion rates were considered in determining a windfall allowance rate so as to avoid potential double counting with SHLAA sites (large sites of 6 or more units). Completions on residential gardens were also excluded. Further information on the windfall rate can be found in the 2014 Housing Background Paper on the Council's website.

Five Year Housing Land Supply Calculation

		Units
A	Mid range OAN figure <i>(OAN figure annualised)</i>	9,800 <i>(490)</i>
B	Net Completions (2011/12 to Q2 2014/15) ⁶	660
C	Residual Requirement <i>(Residual annualised)</i>	9,140 <i>(553.94)</i>
D	Residual 5 year requirement <i>(553.94 x 5)</i>	2,769.7
E	NPPF 5% buffer <i>(0.05 x 2,769.7)</i>	138.48
F	Backlog (490 x 3.5 – 660)	1,055
G	Total 5 year requirement figure <i>(Annualised over 5 years)</i>	3,963.18 <i>(792.64)</i>
H	Commitments <i>Large and small sites with planning permission</i> <i>Sites subject to Section 106</i> <i>Unimplemented Local Plan Allocations</i> <i>Deliverable SHLAA sites</i> <i>Windfall allowance</i>	1,321 <i>910</i> <i>107</i> <i>40</i> <i>79</i> <i>185</i>
I	Supply Percentage (H / G x 100) Years	33.33 1.66

PLEASE NOTE: The above represents the housing land supply position within the context of the objectively assessed need for housing within the district. Both the District Council and South Downs National Park Authority recognise that this level of need cannot be sustainably delivered within the district and are pursuing a housing delivery target that falls significantly short of this level of need. As soon as we are of the view that this housing delivery target, as set out in the Joint Core Strategy, can be used as the basis for calculating our housing land supply, this position statement will be updated.

This note supersedes the previous housing land position note, as at 1 April 2014.

⁶ Total net completion figure is calculated on same period as OAN assessment period (2011/12 to 2031/32)