

**Lewes District Council
South Downs National Park Authority**

Joint Core Strategy Background Paper

Lewes District Housing Implementation Strategy

September 2014



| CONTENTS | Page |
|---|-------------|
| 1. Introduction | 3 |
| 2. Current Housing Supply Position | 3 |
| 3. Housing Target Overview | 4 |
| 4. Housing Trajectory | 5 |
| 5. Projected Five Year Housing Land Supply | 7 |
| 6. Assessment of Risks to Housing Delivery and Contingencies | 8 |
| 7. Monitoring and Review | 13 |
| 8. Conclusion | 15 |
| APPENDIX 1: Housing Land Supply Note 1 April 2014 | 16 |

1. Introduction

- 1.1 The National Planning Policy Framework, March 2012, includes a requirement for local planning authorities to set out their housing implementation strategy. Paragraph 47 of the NPPF states that local planning authorities should:
- *for market and affordable housing, illustrate the expected rate of housing delivery through a housing trajectory for the plan period and set out a housing implementation strategy for the full range of housing describing how they will maintain delivery of a five-year supply of housing land to meet their housing target.*
- 1.2 This housing implementation strategy (HIS) sets out the proposed approach for managing housing delivery in Lewes district to 2030 in order to support the delivery of the housing target set out in the Joint Core Strategy for a minimum of 5,600 additional dwellings between 2010 and 2030.
- 1.3 It identifies the district's sources of housing supply for the plan period; the anticipated trajectory for affordable and market housing; the five year housing supply from the point of adoption; an assessment of risks to housing delivery; ways to manage and mitigate the identified risks; and the proposed framework for monitoring and reviewing housing delivery.
- 1.4 This document should be read in conjunction with the Joint Core Strategy Background Paper: Justification for the Housing Strategy and the Strategic Housing Land Availability Assessment (SHLAA), which provide more detail on the housing strategy and housing land supply. In the absence of specific guidance, it has been assumed that the HIS requirement in the NPPF is intended to be similar to that previously advised in PPS3.

2. Current Housing Supply Position

- 2.1 Net housing completions in the district have averaged 235 per annum since 2006/7, slightly exceeding the district's annualised target in the revoked South East Plan of 220.
- 2.2 In the last financial year (2013/14) housing completions in the district were extremely low, at 113 completed dwellings. This represents less than half of the planned annualised target but was consistent with the district's housing trajectory. The low level of completions was anticipated

and is predominantly due to delays in the delivery of a number of key sites which benefit from planning consent. Market conditions have been identified as the main cause of delay.

- 2.3 The Council's housing land supply position as at 1 April 2014 is set out in the published note in Appendix 1 of this document. This was taken against the agreed Objectively Assessed Need for housing in the district, rather than the revoked South East Plan target, as an interim measure until the Core Strategy housing target carries sufficient weight to be used.
- 2.4 As at 1 April 2014 the Council is currently unable to demonstrate a five year supply of deliverable housing land. However, as sections 4 and 5 of this paper demonstrate, this position will be rectified once the Core Strategy housing target carries weight.

3. Core Strategy Housing Target Overview

- 3.1 The Joint Core Strategy seeks to deliver a minimum of 5,600 homes between 2010 and 2030 (280 per year on average). This will be met through a combination of completions since 2010; the delivery of commitments across the plan area; planned provision through strategic site allocations in the Core Strategy and subsequent allocations to be identified in Local Plan Part 2¹ or Neighbourhood Plans; and a small sites² windfall allowance.
- 3.2 Core Strategy policies for housing delivery are:

Spatial Policy 1- Provision of housing and employment land sets a housing target of 5,600 for the period 2010 to 2030.

Spatial Policy 2 – Distribution of housing sets out how the housing target will be met through completions, commitments, a small sites windfall allowance as well as through site allocations (including subsequent allocations in Local Plan Part 2 and Neighbourhood Plans) apportioned to the various settlements around the district and a broad location for development.

Spatial Policy 3 – North Street Quarter and adjacent Eastgate area, Lewes sets out a mixed use regeneration development, including approximately 390 homes, on land amounting to approximately 9 hectares in central Lewes.

¹ Site Allocations and Development Management Policies DPD

² Sites with capacity of 5 homes or less

Spatial Policy 4 – Land at Greenhill Way/Ridge Way, Haywards Heath (within Wivelsfield parish) sets out land for approximately 175 homes.

Spatial Policy 5 – Land north of Bishops Lane, Ringmer sets out land for approximately 110 homes as a contingency in the event that the Ringmer Neighbourhood Plan is not made by the time of adoption of the Core Strategy or it does not make sufficient allocations for the early part of the plan period.

Spatial Policy 6 – Land at Harbour Heights, Newhaven sets out a broad location for housing development, the detail of which will be identified as an allocation in Local Plan Part 2 or a Newhaven Neighbourhood Plan.

- 3.3 For a detailed justification of the housing strategy the Joint Core Strategy Background Paper: Justification for the Housing Strategy should be referred to.

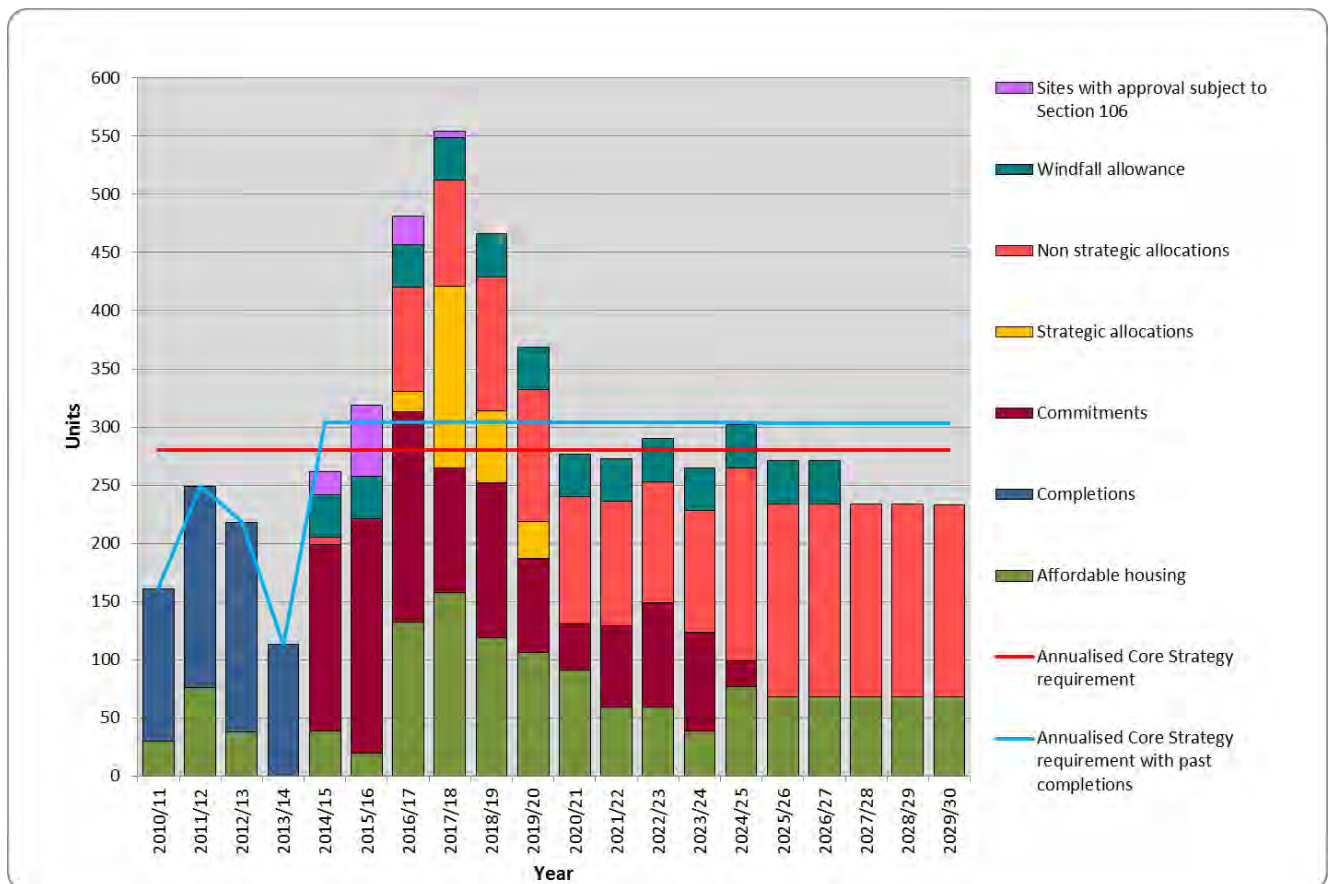
4. Housing Trajectory

- 4.1 The Core Strategy Submission draft includes in Appendix 4 the projected housing trajectory for the Core Strategy plan period (2010/11 to 2029/30) as at 1 April 2013, informed by the 2013 Strategic Housing Land Availability Assessment (SHLAA). An updated housing trajectory for the plan period as at 1 April 2014 (informed by monitoring data to 1 April 2014 and the 2014 SHLAA), is set out in Figure 1 below.
- 4.2 This trajectory assumes adoption of the Core Strategy in the year 2014/15. It takes into account the annualised Core Strategy target plus the backlog in past completions taken against the plan period target since 2010/11.
- 4.3 The trajectory includes the anticipated delivery of both market and affordable housing in the district over the plan period. It consists of actual completions for the first four years of the plan period and anticipated delivery from commitments, potential strategic and non-strategic allocations, a small sites windfall allowance, and affordable housing.
- 4.4 The trajectory shows that the district's housing target can be met with a continuous supply of housing land being available across the plan period. Delivery rates are projected to be highest in the first five years following adoption of the Core Strategy, before reducing towards later years of the

plan period. The higher rates in the early years are in large part attributable to the projected delivery of Spatial Policy 3, a key regeneration site. The reduced rates towards the latter part of the plan period are in part attributable to the inevitable reduced certainty when looking for sites ten or more years into the future. It is quite possible that sites that are not currently known or are currently considered unsuitable, unavailable, or unachievable may have a different status in ten years' time and will boost the projected level of completions (reflecting the fact that the housing target of 5,600 homes is a minimum target and could be exceeded).

- 4.5 The trajectory will be monitored and updated annually, or on an interim basis as key information becomes available, through the Authority Monitoring Reports as well as through annual rolling reviews of the Strategic Housing Land Availability Assessments.
- 4.6 Full details of the sources of future housing supply are included in section 6 of the Joint Core Strategy Background Paper: Justification for the Housing Strategy.

Figure 1: Core Strategy Housing Trajectory as at April 2014



5. Projected Five Year Housing Land Supply

- 5.1 Paragraph 47 of the National Planning Policy Framework states that local planning authorities should:
- *...identify and update annually a supply of deliverable sites sufficient to provide five years worth of housing against their housing requirements with an additional buffer of 5% (moved forward from later in the plan period) to ensure choice and competition in the market for land. Where there has been a record of persistent under delivery of housing, local planning authorities should increase the buffer 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.*
- 5.2 Delivery against the district's annualised South East Plan housing requirement was good, with the target being 220 and annualised delivery since 2006/7 being 235. As such the 5% buffer is considered appropriate and has been used in the housing trajectory.
- 5.3 There has been some shortfall in past completions against the Core Strategy annualised target between April 2010 and April 2014. This leaves the annualised requirement for the remaining Core Strategy period as 304 homes per year. The plan led trajectory shows that this shortfall can be addressed in the first five years of the plan, following the anticipated point of adoption. A significant element of this will be due to the delivery of approximately 390 homes at North Street Quarter in Lewes between 2016 and 2020 (Spatial Policy 3).
- 5.4 In order to address the backlog of homes from 2010/11 to 2013/14 in the first five years from adoption, the district's first five years' annualised requirement will be 356 homes per year. This equates to a supply requirement of 1,780 over five years against which the trajectory shows a surplus of 2,082 for the period 2014/15 to 2018/19. This shows that the supply will be adequate to exceed the target requirements for the first five years from adoption, including addressing the delivery backlog from the first four years of the overall plan period.
- 5.5 Table 1 shows the five year housing land supply position, based on the Core Strategy housing target, using the housing trajectory and phasing of sites applied in Figure 1 above. It shows a supply of 5.85 years, including

allowing for meeting the backlog within the first five years from anticipated adoption.

Table 1: Core Strategy 5 Year Housing Land Supply

| | | Units |
|----------|---|--------------------------------|
| A | Core Strategy figure <i>(Core Strategy figure annualised)</i> | 5,600 <i>(280)</i> |
| B | Net Completions (2010/11 to 2013/14) | 739 |
| C | Backlog (280 x 4 – 739) | 381 |
| D | 5 year requirement plus backlog (1,400 +381) <i>(Annualised over first 5 years)</i> | 1,781 <i>(356.2)</i> |
| E | Commitments (deliverable in next 5 years) <i>Large and small sites with planning permission</i> | 2,082 922 142 |
| | <i>Sites subject to Section 106</i> | 20 |
| | <i>Unimplemented Local Plan Allocations</i> | 414 |
| | <i>Deliverable sites*</i> | 185 |
| | <i>Windfall allowance</i> | 399 |
| | <i>Strategic sites</i> | |
| F | Supply Percentage (H / G x 100) Years | 117 5.85 |

6. Assessment of Risks to Housing Delivery and Contingencies

- 6.1 The local planning authorities are confident that the Core Strategy will deliver sufficient housing to, as a minimum, meet the housing target and ensure a continuing housing land supply throughout the plan period. However, it is prudent to consider potential risks to housing delivery in order that appropriate contingency measures can be activated if necessary.
- 6.2 Risks may be specific to particular sites or more universal risks to housing delivery in general either at a local, regional or national level.

Site-specific risks to delivery

- 6.3 We have always recognised the importance of engagement with key stakeholders and local communities in the production of a deliverable Core Strategy. The process of engagement undertaken is set out in the Statements of Community Involvement. A Core Strategy consultation database has been maintained and this has been used to actively engage with a variety of interested parties throughout the emergence of the Core

Strategy. Further details of the engagement undertaken and how this has informed the content of the Core Strategy are set out in the Consultation Statement.

- 6.4 This full engagement and background evidence allows us to have confidence that the overall strategy, including the strategic sites, will be deliverable. In addition, developers and landowners are encouraged to enter into early pre-application discussions with the local planning authority. As a result, it is considered that risks to delivery are low but where they have been identified mitigation approaches have also been set out.
- 6.5 Potential site-specific risks to the delivery of the strategic sites and broad location in the Core Strategy are set out below.
- 6.6 North Street Quarter and adjacent Eastgate area (Spatial Policy 3)

Risk 1: Suitable access to the site is not achieved.

Mitigation: This risk is considered very low. Extensive pre-application work involving multiple stakeholders has been undertaken. This includes an agreement in principle with ESCC as local highway authority over site access (ESCC is also supportive of the strategic allocation). A planning application is expected to be submitted in October 2014. There will be ongoing engagement between the local planning authorities, ESCC and the developer to facilitate delivery.

Risk 2: Flood defences are not delivered.

Mitigation: This risk is considered very low. Extensive pre-application work involving multiple stakeholders has been undertaken. This includes the costing and agreement of the proposed flood defences with the Environment Agency. A planning application is expected to be submitted in October 2014. There will be ongoing engagement between the local planning authorities, the Environment Agency and the developer to facilitate delivery.

Risk 3: Unexpected costs (eg related to contaminated land) impact upon the viability of the development

Mitigation: The complexity of this redevelopment has long been recognised. The multitude and nature of existing and historic uses, together with issues such as land contamination, archaeological potential, flood risk and associated development viability considerations have

required detailed multi-disciplinary considerations. A Project Team and Project Board were set up to project manage the pre-application work. These groups will continue to meet as necessary through implementation and delivery to ensure that all potential risks are minimised.

Risk 4: Third party relocation is delayed

Mitigation: This risk is considered very low with the majority of land being owned (and promoted for redevelopment in accordance with Spatial Policy 3) by two landowners. Small parcels of the site are owned by other parties, with the most critical part of the site (that is needed to successfully deliver Spatial Policy 3) being owned with East Sussex Fire and Rescue Service. Extensive pre-application work with these landowners, including the Fire and Rescue Service, has been undertaken with relocation proposals being put in place. As at September 2014, East Sussex Fire and Rescue Service have agreed in principle to relocate to an operationally suitable premises.

Risk 5: The redevelopment or relocation of the existing food superstore is not delivered. Given the general trend within major food retailing for restructuring away from large scale superstore developments and extensions there is a degree of risk that this element of Spatial Policy 3 may not be delivered.

Mitigation: None specifically required in terms of housing delivery. This would not directly impact upon the delivery of the housing element of the policy, which will be delivered by a separate developer on a separately owned part of the wider site area. In addition, this risk is considered low given that Waitrose is actively pursuing proposals on the Eastgate part of the strategic allocation, in accordance with Spatial Policy 3.

6.7 Land at Greenhill Way/Ridge Way (Spatial Policy 4)

No site specific risks to delivery have been identified. Planning permission has already been granted for the northern part of the site (62 homes) and there is a particularly strong housing market in this area. Together with few residual on or off site constraints that need to be addressed the timely delivery of the allocation is considered highly likely.

6.8 Land north of Bishops Lane (Spatial Policy 5)

Risk 1: Adequate site access and suitable mitigation of the wider highways impacts, particularly on Earwig Corner, are not forthcoming.

Mitigation: This risk is considered limited. Jointly procured design work has been carried out by consultants on behalf of the applicant and the local highway authority. This has shown a deliverable signals solution for improving the capacity issues at Earwig Corner. As a result the local highway authority has stated in response to the currently pending planning application that it is confident that a deliverable improvement solution can be achieved within the limits of the public highway, and access onto Bishops Lane can be provided, subject to a satisfactory road safety audit and conditions.

Risk 2: High archaeological potential translates into important archaeological findings either reducing the developable site area and/or resulting in delays to delivery.

Mitigation: The site promoter has been in contact with County archaeology specialists. A planning application has been submitted (currently pending determination) to which no objection has been made by County Archaeology, subject to conditions requiring a programme of archaeological works to enable any archaeological deposits and features disturbed during the proposed works to be adequately recorded. The archaeological potential of the site has been known to the site promoter and as such, unless there are exceptional findings, this risk to delivery is considered to be limited.

Risk 3: Delays in delivery due to a delay in the provision of adequate sewerage infrastructure

Mitigation: The relevant parties, including Southern Water, are aware of the situation through consultation relating to both the Core Strategy production and the pending planning application. The delivery of appropriate infrastructure has been factored into the expected delivery timescale in the Core Strategy trajectory. This risk is therefore considered limited.

6.9 Land at Harbour Heights (Spatial Policy 6)

Risk 1: Suitable site access to service the quantum of development cannot be provided.

Mitigation: The district council has engaged in discussions with the site promoter and the local highway authority to ensure that the requirements are understood by all parties. Current indications are that appropriate access would be achievable, although further assessment and impact

mitigation will be required. Continued engagement, including with the emerging neighbourhood plan process will be undertaken.

Risk 2: Highway impacts mitigation is not delivered.

Mitigation: The district council has engaged in discussions with the site promoter and the local highway authority to ensure that the requirements are understood by all parties. Current indications are that mitigation would be achievable, although further assessment and detailed solutions will be required. Continued engagement, including with the emerging neighbourhood plan process will be undertaken.

Risk: Lack of shared aspiration between site promoter, local community, town council and local planning authorities resulting in lack of coordination with neighbourhood planning aspirations for the site.

Mitigation: Ongoing engagement with all parties as above to ensure a coordinated approach to delivery.

General risks to housing delivery

Economic Climate

- 6.10 Delivery in the housing market is closely linked to the state of the local and national economy and in particular access to finance for the developer and mortgage availability and affordability for eventual house purchasers. This has been very evident since the downturn in the housing market in 2007/2008 associated with an unprecedented period of economic recession during which mortgage lending contracted markedly, house prices fell almost everywhere in the UK, build rates fell to some of the lowest levels for decades and accordingly housing delivery in recent years has suffered. While the wider economy is now growing, the recovery has widely been considered to be fairly fragile, house building rates have so far been slow to increase, changes to mortgage lending criteria and the potential for interest rates rises in the short term may have implications for the housing market.
- 6.11 Completions in Lewes district have shown a decline in recent years, which is considered to be at least in part a result of the double dip recession and the lag time associated with the uncertain economic recovery that followed. A number of sites that were expected to have been delivered have yet to commence or have not been fully built out. Monitoring is undertaken of delivery and through this process we contact site owners/developers to understand why development has stalled. Where specific factors can be identified, the Strategic Policy and Regeneration teams will seek to work with the site owner/developer to identify ways in

which development can be 'kick-started'. A recovering annual rate of delivery in the district is anticipated from 2014/15.

Supply of Deliverable Housing Land

- 6.10 In the plan-led system maintaining a deliverable supply of housing land is essential to housing delivery, hence the requirement to demonstrate a rolling five year land supply. It is therefore necessary to avoid a scenario whereby there is insufficient land supply to deliver the plan-period housing target.
- 6.11 As the Joint Core Strategy housing trajectory in Figure 1 demonstrates, there is a sufficient supply of deliverable sites to accommodate the plan period housing target. Through the Monitoring and Delivery Framework we will continue to review, and report at least annually, the delivery of housing and the 5 year land supply position in order that action can be taken if necessary, see Section 7.

Status in the Planning System

- 6.12 It can be expected that an out-of-date local plan may contribute to a constrained level of housing delivery due to the lack of identified housing sites 'in the pipeline'. It is considered that this position, coupled with the recent recessionary climate, will have had an impact on the relatively low level of housing completions in the district between 2010 and 2014. Similarly, it is likely that some sites that are not currently known about may become available, particularly later in the plan period as it becomes increasingly difficult to know what sites will be deliverable.
- 6.13 It may also be reasonable to consider that sites included in the housing trajectory that do not have an extant planning permission may be at somewhat greater risk to delivery than consented sites.
- 6.14 This increased risk is considered to be appropriately addressed through the identification of sites through the Strategic Housing Land Availability Assessment process and the allocation of sites for housing. A number of strategic housing allocations are set out in the Joint Core Strategy, being those considered essential to the wider delivery of the development strategy. This will be supported by subsequent site allocations in the Site Allocations and Development Management Policies DPD (Local Plan Part 2) and/or allocations in number of emerging Neighbourhood Plans. These routes will identify sufficient land to meet the settlement housing distribution targets identified in the Core Strategy Spatial Policy 2.

7. Monitoring and Review

- 7.1 The Core Strategy includes a Monitoring and Delivery Framework. This will assess the overall impact of the strategy and whether or not the vision and strategic objectives are being delivered. As part of this, housing delivery performance will be measured. Monitoring will be undertaken continually and reported in the respective Council/National Park Authority Monitoring Reports. Monitoring will include updating the housing trajectory and the 5 year housing land supply position.
- 7.2 In the event that monitoring identifies that the housing strategy is not being delivered the relevant local planning authority will be able to investigate the reasons for this and take appropriate action depending on the circumstances. Such action may, for example, include a policy review or identifying and facilitating kick-start measures.
- 7.3 Reasonable judgement will be required in determining what appropriate action should be taken, including identifying the reasons for under-delivery and whether it is due to factors outside the planning system. Underperformance in a single year is unlikely to require immediate intervention, whereas persistent underperformance would require more comprehensive assessment particularly where there are likely to be adverse implications for the five year housing land supply and/or the longer term delivery of the plan-period housing target.
- 7.4 Housing delivery indicators to be monitored will be:
- a) Cumulative net completions
 - b) Total net completions for the previous monitoring year
 - c) Five year housing land supply
 - d) Number of windfall dwellings permitted
 - e) Gross annual affordable housing completions
 - f) Percentage of affordable homes completed
 - g) Percentage of applications for 10 or more units meeting at least 40% affordable housing.
- 7.5 Potential measures that may be considered in encouraging sites to be delivered include (the local planning authority is already experienced in these measures):
- a) Site allocations in the Site Allocations and Development Management Policies DPD (Local Plan Part 2); SDNP Local Plan; or Neighbourhood Plans
 - b) Prioritising council-owned land through regeneration initiatives
 - c) Engage with developers and landowners to identify causes of non-delivery and endeavour to facilitate kick-start solutions

- d) Produce detailed planning briefs and/or Supplementary Planning Documents allowing flexibility for differing viability scenarios
- e) Actively engage in pre-application discussions
- f) Take a flexible policy approach when development viability issues have been demonstrated
- g) Seek alternative/additional funding streams and make/assist with bids as appropriate
- h) Set up multi-disciplinary project management teams of relevant stakeholders to help facilitate scheme implementation.
- i) Where it is identified that the delivery of key Neighbourhood Plan allocations are stalled, assist the town/parish council as appropriate in working with the developer/landowner to understand why and seek solutions to unlock delivery.

8. Conclusion

- 8.1 This Housing Implementation Strategy explains that the local planning authorities can demonstrate 5 years' housing land supply and adequate supply through the trajectory for delivery of the plan-period housing target from the anticipated point of adoption.
- 8.2 Strategic site allocations and a broad location for housing will be important in the delivery of the overall strategy. However, as has historically been the case, windfall and delivery on smaller sites will continue to make a significant contribution to the district's housing supply.
- 8.3 The Core Strategy has been produced with stakeholder engagement and deliverability considerations throughout. Potential risks to delivery of key sites have been identified but these risks are considered to be low due to the combination of engagement and agreements that have been put in place. However, monitoring and active facilitation of delivery will be ongoing in case of unforeseen circumstances, upon which appropriate actions will be initiated.
- 8.4 The main risk to housing delivery in the district is considered to be the wider economic climate and its impact upon local and national housing market conditions, the availability of finance and the consequent impacts on levels of activity within the construction industry.

APPENDIX 1:

Housing Land Supply Note as at 1 April 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*³.
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 April 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. To date the South East Plan (SEP) housing requirement figure (4,400) has been used in calculating the Council's housing supply position. However, with the revocation of the SEP (25 March 2013) and paragraph 30 of the NPPG, which expresses caution in using out of date evidence from revoked regional strategies, it is considered that the 4,400 SEP housing requirement figure should no longer be used in calculating the Council's five year supply⁴.
5. Paragraph 30 of the NPPG (housing and economic land assessment) also states that where emerging plans are not capable of carrying sufficient weight, the latest full assessment of housing needs should be considered. At this point in time the Joint Core Strategy is yet to be submitted to the Secretary of State for examination and so carries limited weight. Recent housing need work⁵ considers Lewes district's objectively assessed need to be between 9,200 and 10,400 units between 2011/12 and 2030/31 (460 and 520 units per annum respectively), and this level of need has been agreed by both LDC and SDNPA.
6. Up until the point the housing delivery target in the Joint Core Strategy can be used as the basis for establishing housing land supply calculations, a mid-range point of 9,800 units (490 p.a.) is taken as the housing requirement figure for the purposes of establishing the five year supply for Lewes District.

Additional supply buffer

7. 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.

³ Paragraph 47 of NPPF

⁴ Paragraph 30 of section 6 NPPG (http://planningguidance.planningportal.gov.uk/blog/guidance/housing-and-economic-land-availability-assessment/stage-5-final-evidence-base/#paragraph_030)

⁵ Joint Sussex Coast Housing Market Authorities Housing Study

8. 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 |
| 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

9. Large and small sites benefitting from planning permission, as at 1 April 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 April 2014 there were 772 net units with outstanding permission on large sites (6 units or more) and 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 permissions⁶.
10. As at 1 April 2014 eight sites had a resolution to approve subject to Section 106 legal agreement sign off. At the time of preparing this note, five out of the eight sites were considered deliverable and as such could be included in the five year housing supply calculation. These sites total 142 net units.

Other Deliverable sites

11. 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

12. 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 completions⁷ an allowance of 37 units p.a. has been included in the five year supply calculation.

⁶ 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.

⁷ 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 | OAN figure <i>(OAN figure annualised)</i> | 9,800 <i>(490)</i> |
| B | Net Completions (2011/12 to 2013/14) ⁸ | 578 |
| C | Residual Requirement <i>(Residual annualised)</i> | 9,222 <i>(543)</i> |
| D | Residual 5 year requirement <i>(543 x 5)</i> | 2,712 |
| E | NPPF 5% buffer <i>(0.05 x 2,712)</i> | 136 |
| F | Backlog (490 x 3 – 578) | 892 |
| G | Total 5 year requirement figure <i>(Annualised over 5 years)</i> | 3,740 <i>(748)</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> | 1,343 897 142 40 79 185 |
| I | Supply Percentage (H / G x 100) Years | 36 1.80 |

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 January 2014.

⁸ Total net completion figure is calculated on same period as OAN assessment period (2011/12 to 2031/32) rather than previous SEP period used.