

## LOCAL PLAN EXAMINATION HEARINGS: DAY 3 - MATTER 4

### TECHNICAL NOTE: HOUSING SUPPLY

Task No.	Task	Proposed Modification	Status	Notes
18	<p>Council to carry out general update to Housing Technical Paper to revisit sources of supply:</p> <p>a. Approach to discounting planning permissions for calculating level of new land allocations. Specifically how outline permissions for small and large sites have been discounted and level of discount (subject to availability of data at plan base date).</p> <p>b. Within Housing Technical Paper and/or Local Plan include update of the housing trajectory and 5 year supply based on NPPF 2019 definition and specifically:</p> <ul style="list-style-type: none"> <li>• Re-visit lead in times and phasing rates on allocations using revised definition in NPPF 2019 (to be considered further at stage 2 hearings).</li> <li>• Update housing trajectory reflecting those dwellings programmed to be delivered beyond the plan period at Thornhills garden suburb.</li> </ul> <p>c. A number of mixed use sites have no availability information. When updating the Housing Availability paper (EV62) Council to address this issue and obtain availability information.</p>	MM	Complete	
		MM	Complete	
		MM	Underway	
19	<p>Considerations regarding 5 Year Housing Land Supply figure:</p> <ul style="list-style-type: none"> <li>• Buffer to be applied after taking account of under delivery.</li> <li>• Both Sedgefield and Liverpool approaches discussed. Make clear which approach the Council is using.</li> <li>• Use definition of deliverability in NPPF 2019, Annex 2</li> <li>• Consider whether a lapse rate be applied to full extant planning permissions for small sites bearing in mind definition in NPPF 2019</li> <li>• Re-visit timing for allocated sites.</li> </ul>	MM	Complete	
20	Table 6.2 to include total number of allocations, other sources of supply and lapse rates for planning permissions.	MM	Complete	
21	<i>Council to make clear which documents on website in Local Plan Examination Library regarding Garden Suburbs are new. Also provide a note in the Local Plan news outlining this.</i>		<i>Underway</i>	
22	<i>Note to be prepared setting out the key interventions that are required for the delivery of the two garden suburbs. This should include TA work and phasing details of the sites. The document should detail linkages between the two garden suburbs and implications of one of the garden suburbs not being delivered. Also include relevant parts of A641 improvement programme such as funding, trigger points and timescales.</i>		<i>Underway</i>	

**TASK 18 (a): COUNCIL TO CARRY OUT GENERAL UPDATE TO HOUSING TECHNICAL PAPER TO REVISIT SOURCES OF SUPPLY:**

**Approach to discounting planning permissions for calculating level of new land allocations. Specifically how outline permissions for small and large sites have been discounted and level of discount (subject to availability of data at plan base date).**

**Background**

1.1 At the stage 1 hearings the way in which extant planning permissions had been discounted, both to determine the level of new land allocations required to meet the housing requirement figure and with regard to the five year housing land supply, was explored. The Inspector raised concerns about the apparent use of a dual approach. The work undertaken subsequent to the hearings has applied a different approach and is set out below in the relevant extract from the draft update to the Housing Technical Paper (HTP). The paragraph numbers are those in the draft updated HTP. Therefore the questions relating to the original approach have not been answered specifically given this has been superseded whilst the current approach is fully explained.

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**Extract from updated draft Housing Technical Paper (HTP)**

**Completions**

6.3 The tables below show levels of delivery since 2001/02. Completions for 2018/19 (the most recent monitoring year) represent the supply for Year 1 of the Local Plan Housing Trajectory.

**Table 9 - Gross Completions 2001/02 – 2018/19**

Year	Conversions	New Build	Total
2001/02	149	418	567
2002/03	161	377	538
2003/04	247	490	737
2004/05	271	772	1043
2005/06	414	823	1237
2006/07	321	1085	1406
2007/08	411	987	1398
2008/09	188	580	768
2009/10	360	350	710
2010/11	182	311	493
2011/12	172	349	521
2012/13	108	413	521
2013/14	99	292	391
2014/15	175	244	419
2015/16	111	245	356
2016/17	153	264	417
2017/18	175	218	393
2018/19	251	326	577

<b>Total</b>	<b>3948</b>	<b>8544</b>	<b>12492</b>
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Source: Housing Land Availability Database – March 2019

**Table 10: Net Completions 2001/02 – 2018/19**

Year	Losses			Completions	
	Conversions & Changes of Use - Dwelling to Other uses	Demolitions	Total Losses	Gross	Net
2001/02	10	105	115	567	452
2002/03	20	70	90	538	448
2003/04	5	150	155	737	582
2004/05	10	205	215	1043	828
2005/06	20	35	55	1237	1182
2006/07	9	25	34	1406	1372
2007/08	5	44	49	1398	1349
2008/09	8	51	59	768	709
2009/10	0	3	3	710	707
2010/11	4	3	7	493	486
2011/12	16	7	23	521	498
2012/13	0	5	5	521	516
2013/14	0	34	34	391	357
2014/15	0	103	103	419	316
2015/16	1	2	3	356	353
2016/17	0	108	108	417	309
2017/18	16	83	99	393	294
2018/19	14	8	22	577	555
<b>Total</b>	<b>138</b>	<b>1041</b>	<b>1179</b>	<b>12492</b>	<b>11313</b>

Source: Housing Land Availability Database – March 2019

### Extant Planning Permissions

6.4 The most recent annual extant planning permissions data has informed the Council's updated housing trajectory whilst the overall level of total extant planning permissions over the last six years is shown in Table 11 to provide context. A breakdown of the most recent annual data by type of site and whether brownfield or greenfield is provided in Table 12.

**Table 11: Extant Planning Permissions March 2014 to March 2019**

HLA Update	New Build	Conversions/ Change of Use	Total
March 2014	2365	735	3100
March 2015	2289	745	3034
March 2016	2330	881	3211
March 2017	2020	884	2904

March 2018	2208	915	3123
March 2019	2644	974	3618
<b>6 Year Average</b>	<b>2309</b>	<b>856</b>	<b>3165</b>

Source: Housing Land Availability Database

**Table 12: Extant Planning Permissions as at 31<sup>st</sup> March 2019**

	Brownfield		Greenfield		Total Dwellings
	Number	%	Number	%	
<b>New Build</b>	2010	76	634	24	2644
<b>Conversion</b>	883	91	91	9	974
<b>Total</b>	<b>2893</b>	<b>80</b>	<b>725</b>	<b>20</b>	<b>3618</b>

Source: Housing Land Availability Database, March 2019

6.5 Whilst overall there are in the order of 3,600 units with planning permission these have to be assessed for their deliverability (permissions included in the 5 year supply) and developability (permissions achievable in the remainder of the plan period) in accordance with the definitions in Annex 2 to the National Planning Policy Framework 2019. Notwithstanding the fact that the annual update of the Housing Land Availability was 31<sup>st</sup> March 2019, given that this technical paper has been updated part way through the monitoring year, limited more recent information on completions or renewed progress on previously stalled sites has been taken into account. The consequence is that the overall level of dwellings is reduced as compensatory new sites have not been added. The next annual update will be based on the Housing Land Availability data as at 31st March 2020. Allocations with planning permission remain recorded as allocations for the purpose of the trajectory. Showing these as sites with planning permission is often complicated for monitoring purposes since allocations do not always progress as single land units.

6.6 In order to determine the sites that are either deliverable or developable several approaches were taken:

- Circulation of a listing of all sites to the Council's Development Management Section with responses recorded against each site. Comments regarding knowledge about activity on these sites, for example, whether they were aware that the applicant was about to submit a Discharge of Condition application, or a revised planning application helped to determine whether it was reasonable to suppose that activity would start or restart on sites.
- A questionnaire survey (see Appendix 6) was sent to all agents/owners/developers of major sites (as defined in NPPF 2019, Annex 2) in August 2019. This resulted in 25 responses out of 97 survey forms sent out, equating to a response rate of approximately 25%.
- Ongoing site visits during the HLA update to check long term commencements (under construction for 3 years or more).
- Statements of Deliverability for Council led schemes.

6.7 The Council also considered entering into Statements of Common Ground (SOCG) with developers of major sites and sought an indication of developers' willingness to enter into such agreements through the survey of major sites. Of the responses received only six developers/agents/landowners confirmed they wished to do so with three of these sites being new build (largest 23 dwellings) and three being conversions (largest 42 units). A further positive response was received to a site which is also an allocation (50 dwellings) and for

which the Council already holds information as part of the allocation selection process. Given this position, together with the fact the revised Planning Practice Guidance (July 2019) (PPG) does not make specific reference to statements of common ground as was the case in the previous iteration of the PPG, the Council did not consider it a prudent use of resources to pursue this approach further. In reaching this decision it also has regard to the conclusions reached by the Inspector considering this issue in relation to housing land supply at Hutton Cranswick (East Riding of Yorkshire Council)<sup>1</sup>. He concluded that there was no fundamental difference between the way the council approached the collation of information (exchange of correspondence and use of a proforma) and a slightly more formal SOCG.

### **Extant Planning Permissions - Major Sites (10 + homes/ 0.5ha or more)**

6.8 Following the analysis of sites in accordance with the definitions in Annex 2 of the 2019 NPPF, certain categories of site were excluded as summarised below:

1. **Stalled sites** based on evidence in the Housing Land Availability database.
2. **Sites with outline permission** for major development unless there was clear evidence they would come forward. Where sites with outline permission were not due to lapse for some time but there was no evidence the developer was proceeding towards a reserved matters applications they were excluded. In some cases the survey results demonstrated that a reserved matters application was being worked up or had been submitted.
3. **Long term commencements with only a few plots remaining** where it was clear the site was effectively built out and no further units would be completed.
4. **Local Plan allocations with planning permission** in order to avoid double counting as these are also recorded under allocations in the housing trajectory.

### **Extant planning permissions - Small sites (fewer than 10 dwellings)**

6.9 Two approaches were taken to assessing this category of site:

1. **Site by site assessment:** The starting point was to follow the approach in Annex 2 to NPPF 2019 which states sites not involving major development and have planning permission should be considered deliverable until permission expires unless there is clear evidence that homes will not be delivered within five years. As the Inspector in the East Riding of Yorkshire appeal (reference above) stated, there is no definition of what constitutes clear evidence of future delivery. The Housing Land Availability Database specifically monitors long term commencements (sites under construction for more than 3 years) to record progress and help determine if sites are actually going to be built out and this information along with the judgement and expertise of officers, including survey responses from the Development Management Section, was used to determine whether sites be excluded and establish their positioning in the housing trajectory. For example, sites made 'live' due to works in the past but which will not be built were identified and discounted. In other cases sites which appeared to have stalled had obtained a new (and usually amended) permission. This site by site approach resulted in a discount level of just over 4% for small sites.
2. **Percentage Discount:** Given that the level of discounting for small sites was less than the 10% figure commonly applied in practice, and in order not to overstate the contribution of small sites with permission and potentially undermine the overall delivery of the housing requirement a further discount of just over 5% was applied bringing the overall discount on

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<sup>1</sup> Appeal Ref: APP/E2001/W/18/3207411, Land to the south of Williamson Road, Hutton Cranswick, PJG Ware, 5<sup>th</sup> June 2019

small sites to 10%. The Council recognises that this is going further than the definitions in the NPPF 2019. It is however, consistent with a number of Section 78 appeal decisions notably Honeybourne<sup>2</sup> and Rothley<sup>3</sup>. In the Honeybourne case the Inspector referenced the Department of the Environment Planning and Research Programme Paper "Housing Land Availability" by Roger Tym and Partners, published in 1995. Whilst these findings are believed to relate to planning permissions overall, as opposed to small sites, they provide a useful reference point.

6.10 The overall level of discounting of extant planning permissions is shown in Table 13 below whilst Table 14 lists sites excluded from the supply of extant permissions. Appendix 4 shows all sites with planning permission included in the overall housing supply with the totals for each year reflected in the trajectory graph (Figure 1).

**Table 13: Summary of Discounting for Extant Planning Permissions**

Type of Site	All Dwellings	Discounted Dwellings	Remaining Dwellings	% Discount	5YHLS
<b>Major</b>	<b>2254</b>	<b>1223</b>	<b>1031</b>	<b>54.3%</b>	<b>977</b>
Small: Site by Site Analysis	1299	55	1244	4.23%	
Small: Additional 5.77% Discount	1299	75	1224	5.77%	
<b>Total Small</b>	<b>1299</b>	<b>130</b>	<b>1169</b>	<b>10%</b>	<b>1169</b>
<b>Overall Total</b>	<b>3553*</b>	<b>1353</b>	<b>2200</b>	<b>38%</b>	<b>2146</b>

\*Figure of 3,553 used for calculations as some data updated post March 2019 HLA Review following survey responses (HLA March 2019 Figure 3,618)

**Table 14: Extant Planning Permissions Discounted**

HLA Ref	Planning Application Ref	Site Address	Status	Remaining Capacity	Summary of Reason Discounted
<b>Planning Permissions discounted from sources of supply</b>					
00190	05/00273	St .Aidans Works, Bacup Road, Todmorden	Change of Use	9	Stalled. No evidence of activity. Only completion 2010.
00372	09/00314	Land rear of Raven Lodge, Wallis Street, Sowerby Bridge.	Full	2	Stalled
00385	09/00314	Land rear of Raven Lodge, Wallis Street, Sowerby Bridge.	Full	1	Stalled
00412	17/01508	Site of Ovenden Way Hotel, Ovenden Way, Ovenden, Halifax.	Outline	21	Major Outline. No survey response.
00583	21/07/2009	Land east of Hullen Edge Hall, Hullen Edge Lane, Elland.	Under Construction	1	Stalled
00605	05/01626	Adjacent, 29 Hud Hill, Shelf, Halifax.	Under Construction	1	Stalled
00614	93/02544	Land off, Shelf Hall Lane, Shelf, Halifax.	Full	1	Built. 1 remaining plot will not be built
00909	07/01435	Broomfield Avenue, Halifax.	Full/u/c	4	Stalled
00960	90/02927	Former Heath School Yard, Linden Road, Halifax.	Outline	7	Stalled
01090	06/01998/FUL	Holly Bank Works, Rochdale Road, Greetland	Full	23	Stalled
01101	06/02309	Riverside Works, Stirn Bridge, Sowerby Bridge.	Under Construction	3	Stalled

<sup>2</sup> Appeal Ref: APP/H1840/A/12/2171339, Honeybourne, H Stephens, 24<sup>th</sup> July 2012

<sup>3</sup> Appeal Ref to be added

01201	94/02651	Marsden Gate Farm, Marsden Gate, Sowood, Halifax.	C/U	1	Stalled
01468	96/02062	Adjacent, 69 Wakefield Road, Hipperholme, Halifax.	Full	2	Stalled
01589	01/00775	Former Fenton Works, Thornton Terrace, Halifax.	C/U	1	Stalled
01708	06/00482	Land opposite, 25 Scar Head Road, Sowerby Bridge.	Under Construction	1	Stalled
01751	03/01860	Land rear of, 24 Holdsworth Road, Holmfield, Halifax.	Under Construction	1	Stalled
1900	07/01317	Land adjacent, Bryan Road, Elland.	Full	5	Stalled
2567	07/02351	Jowler Mill, Jowler, Luddenden Foot, Halifax.	Conversion	4	Stalled
02726	04/01508	Land rear of 30 Cross Lees Road, Todmorden	Under Construction	24	Stalled
02923	82/03093	Adjacent Lower Swift Place, Bar Lane, Ripponden, Sowerby Bridge.	Under Construction	1	Stalled
03158	85/01579	Land off Brookfoot Lane, Southowram, Halifax	Outline	12	Major Outline - Unlikely to be built
03181	14/00218	Monoplas, Badger Lane, Hipperholme, Halifax	Outline	74	Major Outline. DM comments are unlikely to progress.
03310	98/00518	Royd Quarry, Brookfoot Lane, Southowram, Halifax.	Outline	24	Major Outline. Unlikely to progress.
03830	05/02008	Clough Mills, Halifax Road, Shelf, Halifax.	Outline	20	Major Outline. Survey response unlikely to proceed
03835	12/00996	Land rear of, 40 The Hough, Northowram, Halifax.	Under Construction	1	Stalled
3853	06/02493	Long Rigging Barn, Holme House Lane, Luddenden, Halifax.	C/U	1	Stalled
03876	03/02348/FUL	Borough Band Club, Wharf Street, Brighouse	Full	60	Stalled
3878	16/00296	The Ranch, New Road, Holywell Green, Halifax.	C/U	2	Stalled
03998	10/01342	The Maltings, Halifax Road, Hipperholme, Halifax.	Full	2	Stalled. No response. Assume last 2 will not be built.
4023	08/00323	Barn at, Grindlestone Bank, Mixenden, Halifax.	Under Construction	1	Built
4034	08/00663	Westroyd, 42 Victoria Road, Elland.	Under Construction	1	Stalled
04117	14/01164	Grounds of Manor House Nursing Home, 127 Wakefield Road, Lightcliffe, Halifax.	Under Construction	1	Survey Response built.
4209	09/00670	Grove Inn, Burnley Road, Luddenden Foot, Halifax.	C/U	3	Stalled
4512	17/00033	Former Engineering Works, Turner Street, Ovenden, Halifax.	Outline	32	Stalled
04582	14/01479	Rear of Deanhurst Garage, St Giles Road, Lightcliffe, Halifax.	Full/Outline	30	Stalled. No survey response on whether scheme will proceed
4612	10/00750	The Workshops, Hill Top, Hollins Lane, Sowerby Bridge.	Under Construction	1	Stalled
4623	13/00105	Site of 16 Grindlestone Bank, Moor End Road, Halifax.	Under Construction	1	Stalled
4649	18/00709	New Yard Farm, Beestonley Lane, Stainland, Halifax.	Under Construction	4	Built
4691	16/01319	Land adjacent Heald Wall Nook Cottage, Scammonden Road, Barkisland, Halifax.	Under Construction	1	Built
04857	16/00031	Former Engine Room, Hollins	Under	13	Survey states built.

		Mill, Rochdale Road, Todmorden.	Construction			
4926	15/00772	Land West Of Shaw Close, Station Road, Holywell Green, Elland.	Under Construction	1		Survey states built
05202	14/00516	Harley Mill, Harley Street, Todmorden.	Outline	14		Check DM comment on 2017 pp. Not in HLA. Emailed DO.
05214	17/00776	Grange Farm, Doctor Hill, Halifax.	Outline	13		Major Outline. No survey response.
5334	18/00890	Stones Cottage, Pudsey Road, Todmorden.	Full	2		Holiday Let
05370	18/01237	The Old Woolcombers Mill, 14 Union Street South, Halifax.	Under Construction	10		Survey states built
Planning Permissions discounted as included in land allocations source						
HLA Ref	Planning Application Ref	LP Ref	Site Address	Status	Remaining Capacity	Comments
00997	16/00870	LP1425	Siddal Top Lane, Siddal, Halifax	Outline	105	Major Outline but uncertainty over delivery in short term.
01968	17/01343	LP1322	Former Salford Works, Bramston Street, Rastrick, Brighouse.	Full	65	Survey response states proceeding
02110	18/00017	LP0771	Land at Junction of, Birkby Lane and Bradford Road, Bailiff Bridge, Brighouse.	Outline	41	Survey demonstrates will come forward in 5 year period.
03391	12/01423	LP0658	Cinderhill Mill, Halifax Road, Todmorden.	Outline	23	Survey demonstrates will come forward in 5 year period.
04228	16/00160	LP0164	Site of High Level Works, Pellon Lane, Halifax.	Outline	34	No response/site specific evidence
04651	16/00955	LP0964	Land adjacent to Holly Mount, 113 Rochdale Road, Greetland, Halifax.	Outline	14	Deliverable. 18/01535/OUT pending
04817	17/01386	LP0964	Holly Mount, 113 Rochdale Road, Greetland, Halifax.	Full	1	Corner of above allocation
04944	17/01234	LP0234	Hebble Brook Business Park, Hays Lane, Mixenden, Halifax.	U/C	98	Survey demonstrates will come forward in 5 year period
04977	17/01039	LP0407	Spring Hall Mills, Mile Cross Road, Halifax.	Full	16	No survey response
05027	18/01326	LP0287	Land rear of and, 287 Willowfield Road, Halifax.	Full	10	DM response - Developers on site July/Aug 2019 - active. No survey response.
05118	18/00558	LP1609	Central Ironworks, Claremount Road, Boothtown, Halifax.	U/C	46	
05221	16/01381	LP1116	Land South Of Brooklands, Brighouse Road, Hipperholme, Brighouse.	Outline	50	Survey response - proceeding
05283	17/00045	LP1194	Land Rear Of Exley Park Hotel, Park Lane, Siddal, Halifax.	Outline	11	Survey demonstrates will come forward in 5 year period.
05287	18/00310	LP0814/0815	Stannary Place, Halifax.	Outline	100	Survey demonstrates will come forward in 5 year period.
05297	17/01345	LP1654	Church View Development Site, Church View, Sowerby Bridge.	Outline	44	Council project and intend to deliver within 5 years.
05365	17/01556	LP0571	Building North West Of Princess Works, Birds Royd Lane, Brighouse.	Full	100	Survey demonstrates will come forward in 5 year period
05390	18/00815	LP0509	Perseverance Works, Dewsbury Road, Elland.	Outline	90	Within Mixed Use Allocation - pp 30.5% of

						area. Original allocation did not include dwellings.
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### Windfall Sites

- 6.11 Windfall sites are sites which have not been specifically identified in the development plan<sup>4</sup>. They normally comprise previously developed sites that have unexpectedly become available. The NPPF states that an allowance can be made for windfall sites within the supply if there is compelling evidence that they will provide a reliable source of supply. Planning Practice Guidance also states that ‘local planning authorities have the ability to identify broad locations in years 6-15, which could include a windfall allowance<sup>5</sup>.
- 6.12 The Council has prepared a note on its approach to including a windfall allowance in the Local Plan; this can be found in Appendix 1 to this Technical Paper.
- 6.13 Windfalls have historically made an important contribution to the housing supply in Calderdale. Since 2008/09, the average number of completions on all windfall sites (irrespective of size) has been 308.5 units per annum. The number of completions has not fallen below 100 units, even during periods of slow economic growth. However, more recently, the number of completions have fallen on the larger (10+ sites), but the number of completions on the smaller sites (0-9 units) have remained fairly consistent. This underlines the important contribution of development on smaller sites and shows a continuation of the historic trend in Calderdale of development generally taking place on smaller sites.
- 6.14 The windfall allowance has been calculated using trend data from housing completions on small sites over the period 2008/09 – 2018/19. It is considered that the data is more accurate because the Council is taking a more cautious approach to calculating the future windfall allowance and is avoiding using data from periods of stronger economic growth. The Council has also excluded completions on large windfall sites, although they could come forward in the future. In addition to using more data from the later time period, the Council is using completions data rather than planning permissions data. This gives a more accurate picture of the planning permissions which have been implemented rather than just granted. This also means that there is no need to apply a discount to factor in implementation rates.

**Table 15: Windfall Allowances for the Local Plan**

Plan Period	Assumptions	Calculation	No. Units
<b>1 – 5 Years</b>	100% of historic delivery rate on Non-Exceptional Sites for years 4 & 5 only	159.4 x 2	318.8
<b>6 – 10 Years</b>	80% of historic delivery rates on Non-Exceptional Sites in Halifax, Brighouse, Elland, Ripponden and Todmorden.	(120.5 x5) x 0.8	482
<b>11 – 15 Years</b>	80% of historic delivery rates on Non-Exceptional Sites in Halifax, Brighouse, Elland, Ripponden and Todmorden.	(120.5 x5) x 0.8	482
<b>TOTAL</b>			<b>1,282.8</b>

<sup>4</sup> NPPF, 2019

<sup>5</sup> PPG, Paragraph: 24 Reference ID: 3-023-20190722

## New Land Allocations

- 6.14 Sufficient sites are allocated to deliver the revised housing requirement figure as shown in Appendix 3. The “Site Allocations Methodology – Publication Draft” (2018)<sup>6</sup> together with the note<sup>7</sup> accompanying selection of additional sites to meet the revised housing requirement figure comprehensively explains the methodology underpinning site selection. The overall supply with the new land allocations provides a buffer of some 600 dwellings.
- 6.15 As sites progress the number of dwellings delivered will vary from those shown in the Local Plan with some sites showing a decrease and others an increase. There is already evidence of this as developers prepare schemes to submit as planning applications. One area where an increase is being shown is with those mixed use sites now coming forward solely or mainly for residential use. Sites where to date the capacity has decreased to zero and the reasons why are listed in Table 16.

**Table 16: Local Plan allocations where residential capacity reduced since Local Plan Publication Draft (August 2018)**

Site Ref	Location	Original Capacity	Amended Capacity	Reason
LP0075	Land at Laithe Croft Farm, Bowling Green, Stainland	11	0	Historic England objection
LP0759	Land off Belle Vue Rise, Shelf	10	0	Completed Year 1 (18/19)
LP1287	Northgate House, Halifax	MU Site 40	0	No residential in final scheme under construction
LP 1229	Near Royd, Ovenden	474	400	Further consideration of constraints
LP0400	Birdcage Lane, Halifax	6	0	Built

## Empty Properties

- 6.16 As set out in the Calderdale Empty Homes Strategy 2014-2020, the number of empty properties in the borough has been falling, with a decrease of 53% between December 2009 and January 2020. This demonstrates the success of the measures used to bring empty properties back into use. The Empty Homes Strategy recognises that there is the possibility that some properties may not be brought back into use and be demolished instead. The residual properties as the numbers decrease are likely to be more challenging to bring back into use.
- 6.17 At 15 January 2020, there were 1544 long term empty dwellings (defined as empty for 6 months or longer) in the Borough. In more general terms, the number of empty properties in Calderdale is falling, and the Council through its Housing Service is actively pursuing initiatives to bring these back into residential use. However, many such properties can be difficult to bring back into residential use (as documented in the Council’s Empty Homes Strategy 2014-2020 and reflected in the SHMA) and it is therefore difficult to quantify the contribution empty properties may make to delivering housing over the plan period.
- 6.18 In just over three years (between November 2016 and January 2020), there was a reduction of 264 long term empty properties but projecting this rate forward cannot be done with any

<sup>6</sup> Site Allocations Assessment Methodology Statement, Calderdale MBC, 2018

<sup>7</sup> In preparation

certainty. Therefore, empty homes being brought back into use have not been included as a source of supply in the Local Plan.

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**Task 18 (b): Within Housing Technical Paper and/or Local Plan include update of the housing trajectory and 5 year supply based on NPPF 2019 definition and specifically:**

- o Re-visit lead in times and phasing rates on allocations using revised definition in NPPF 2019 (to be considered further at stage 2 hearings).
- o Update housing trajectory reflecting those dwellings programmed to be delivered beyond the plan period at Thornhills garden suburb.

**Background**

1.2 At the stage 1 hearings the housing trajectory and five year supply were explored. The Inspector raised concerns about the apparent use of a dual approach. The work undertaken subsequent to the hearings has applied a different approach and is set out below in the relevant extract from the draft update to the Housing Technical Paper (HTP). The paragraph numbers are those in the HTP.

1.3 In re-visiting the lead in times and build out rates on the allocations the definitions in NPPF 2019, Annex 2 have been used as well as revised assumptions about the adoption date of the Local Plan.

1.4 The housing trajectory has been updated but is not extended beyond the Plan period since the evidence demonstrates that the Thornhills Garden Suburb will be completed within this timeframe.

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**Extract from updated draft Housing Technical Paper (HTP)**

**7. HOUSING TRAJECTORY**

7.1 The National Planning Policy Framework requires local planning authorities to set out the deliverability and developability of sites in the form of a housing trajectory. This is based on lead-in times and build-out rates to indicate the number of dwellings likely to be delivered each year during the Plan period.

7.2 The approach in the Local Plan builds on and refines that originally employed in the Strategic Housing Land Availability assessment (SHLAA) and agreed by the SHLAA Working Group which includes housebuilders. A number of recent research documents published by the development industry considering the issue of lead-in times and delivery rates have also been employed:

- Barratt and Chamberlain Walker – The Role of Land Pipelines in the UK Housebuilding Process (September 2017)
- Nathaniel Lichfield and Partners – Start to Finish: How quickly do large-scale housing sites deliver? (November 2016).

7.3 These reports outline the process from site allocation to the completion of a site.

- Preparation of planning application

- EIA Screening and Scoping, where required
- Receipt and Validation by the Council
- Negotiation of S106 and other planning obligations
- Statutory consultation
- Planning Committee
- Grant of Planning Permission
- Potential for Judicial Review
- Discharge of planning conditions, submission of reserved matters application
- Commence work on site e.g. opening up works/delivery of infrastructure (not delivery of dwellings)
- Delivery of dwellings
- Site completion

### Lead-in Times

7.4 The Planning Service has a vast amount of data relating to planning applications and the monitoring of housing completions. Data was extracted from both the Housing Land Availability database (residential permissions and quarterly monitoring) and the Idox Uniform database (planning applications) for all new build residential site completions, for developments of 8 or more units (correlates to the Local Plan threshold of 0.25ha at 30dph) between 01.01.2000 and 30.09.2017 (the latest quarterly review available at the time this work was prepared whilst further analysis over the relatively short period since then to date is unlikely to add greatly to the existing findings). Analysing data over this time period takes account of peaks and troughs in the housing market. Basing research on local evidence held by the Council also provides a local perspective on this aspect of delivery. This work was augmented by the views of the Home Builders Federation along with site specific evidence provided by agents/developers/landowners. There remains a continuing dialogue between the Council and developers/landowners/agents regarding achievability with regard to the types of evidence advocated in the PPG.

7.5 Analysis of the data for the following stages was undertaken:

- Validation to approval of planning application.
- Approval of planning application to site commencement (includes pre-commencement conditions).
- Site commencement to first plot completion (groundworks and laying of infrastructure).
- First plot completion to site completion (to calculate delivery rates).

7.6 These assumptions (see Table 17) apply to both sites with planning permission in the Housing Land Availability database and allocations where a planning application has been submitted or planning permission granted. Whilst small sites are positioned in accordance with the agreed rates, in order to avoid unrealistic peaks in the early years of the trajectory some sites were moved back. Many of these minor sites involve conversions which tend to be completed at one specific date and some of which can be under construction for a number of years.

**Table 17: Lead in Time Assumptions**

Site Status	Lead in Time (Years)
Site has outline planning permission, no reserved matters application submitted	2.5 years
Site has outline planning permission, reserved matters pending	2 years

consideration	
Site has outline planning permission, reserved matters approved	1.5 years
Full planning application pending consideration	2.5 years
Full planning permission	2 years

7.7 Following the stage 1 hearings and as more recent information has become available lead-in times for existing allocations have been revised whilst the additional sites to meet the revised housing requirement have been added to the trajectory. Site specific evidence was employed where available but in its absence a range of factors including those referenced in the Barratt and Chamberlain and Nathaniel Lichfield research documents influenced their positioning as explained in the Council’s working note on positioning<sup>8</sup>. For clarity the following factors were applied cumulatively:

- +6 months for sites where there is no housebuilder on board
- +12 months where the site is in multiple ownership
- +12 months for sites of 250+ units to allow for masterplanning

7.8 In relation to the additional time to reflect there being no housebuilder on board this is a somewhat cautious approach. The appeal decision for the Hutton Cranswick case (cited above) commented that whilst a site is not under the control of a housebuilder but a land promoter it is one step further away from actual development but it is clearly in land promoter’s interest to sell rapidly to housebuilders. There is no implication that such sites are less likely to come forward in the first five year period.

7.9 The Council’s Housing Service is pursuing a number of initiatives, including the Calderdale Together Investment Partnership (CTIP) and North Halifax Transformation Programme, and has provided Statements of Deliverability to inform the housing trajectory.

7.10 Those allocations requiring a policy change, such as sites in the existing Green Belt, cannot be delivered before adoption of the Local Plan. For the purposes of the trajectory this is taken as being April 2021. Whilst the Plan may be adopted before this date this assumption does allow for any slippage in the plan making process and provides a robust approach to the positioning of the allocations. The date of adoption and its impact on the trajectory was debated at length during the stage 1 hearings. Information provided by the development industry shows that detailed planning applications are already being worked up for a number of sites in the Green Belt with the intention of submitting these immediately upon adoption of the Local Plan enabling these sites to start delivering dwellings earlier than would otherwise be the case.

7.11 The trajectory has also been informed by the availability of sites and the proximity of other land allocations given that the market will not usually bring forward sites in proximity and within the same housing market at the same time. However, given that such sites could be developed earlier they can be moved forward to increase the choice and supply of sites in the five year supply, should this be necessary, and replace any sites which have not come forward as expected.

**Build Out Rates**

7.12 The assumptions in Table 18 have been used to determine build out rates. These are based on the Council’s planning data analysis referred to above and continuing dialogue with

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<sup>8</sup> Methodological Note on Positioning of Land Allocations, Calderdale MBC Working Note, November 2019 (IN PREPARATON)

housebuilders. Details in relation to specific sites are held in the Local Plan Site Assessment database.

**Table 18: Delivery Rate Assumptions**

No. Dwellings	Build Out Rate
Less than 50 units	30 per annum
50-149 units	40 per annum
150 units and above	55 per annum

**Modern Methods of Construction**

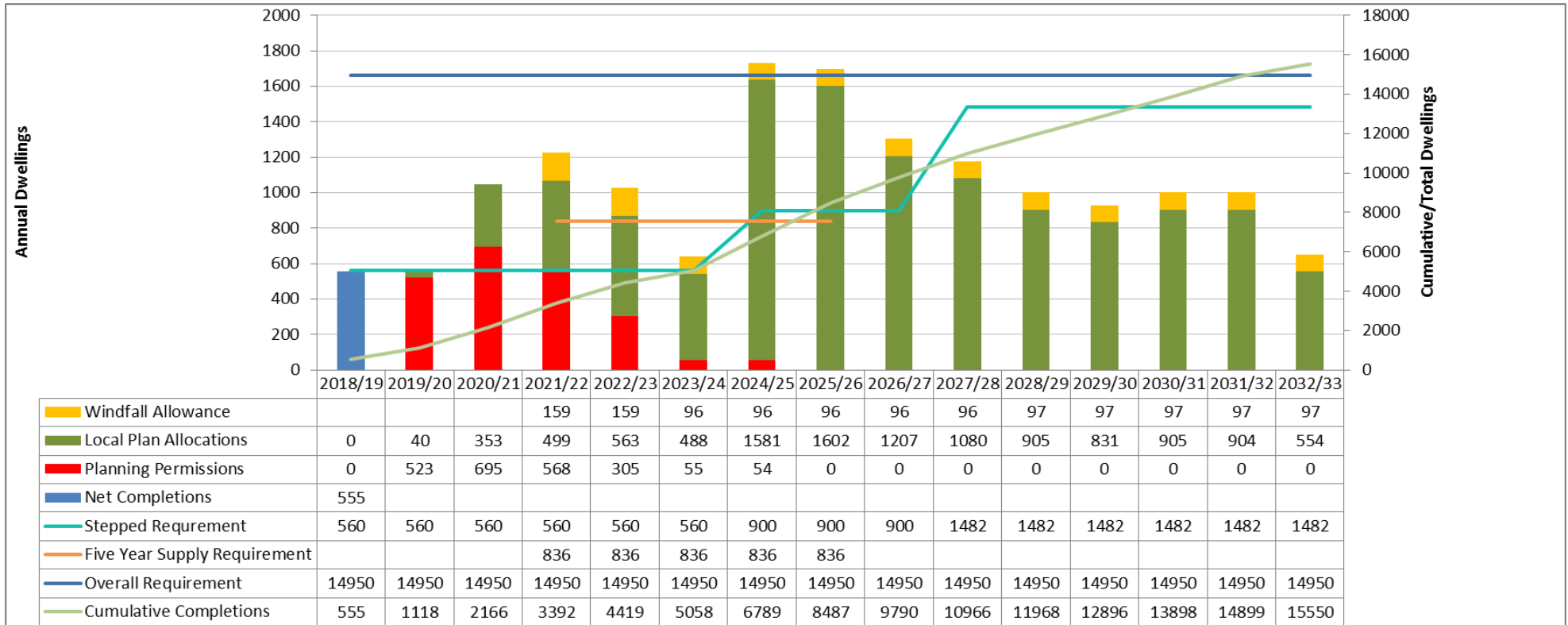
7.13 An area that is evolving rapidly is Modern Methods of Construction (MMCs) where units are built as components in a factory and assembled on-site with a saving in the overall time taken to complete units. The Government expects this form of construction to be instrumental in increasing delivery rates. One developer has purchased a company specifically for this purpose and suggests that delivery rates are anticipated to be 60 dwellings per annum where 1 market outlet is present with this increasing to 120 units where 2 outlets are present. Given the fact that MMCs are a relatively recent innovation they have not, at this stage, been factored into the delivery rates in Table 18 although this is likely to change in the future. Where specific information has been provided by a developer that MMCs are to be employed this information has influenced delivery rates.

**Conversions and new build flats**

7.14 The above lead-in and build-out rates generally apply to new build dwellings. For conversions the SHLAA contains a lead-in time of 2 years, although this varies slightly depending on the size of the development and a build out rate of 40 units per annum. New build blocks of flats are assumed to have the same lead-in times as new build dwellings but completions levels are more difficult to assign as such developments often have one overall completion date. As such completions are positioned several years ahead on a site by site basis but may be split if the development is phased. This primarily applies to mixed use sites where information from developers has influenced the positioning of sites.

7.15 The housing trajectory, covering a 15 year period, is shown in Figure 1 with the reasons for it being stepped explained in Section 3 above. Upon adoption of the Local Plan future updates of the housing trajectory will be published in the Authority Monitoring Report published annually.

Figure 1: Calderdale Housing Trajectory 2018/19 to 2032/33



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## **Five Year Housing Land Supply**

1.5 This section incorporates text from the draft update of the Housing Technical Paper together with a series of five year housing land supply (5YHLS) calculations in order to demonstrate the impacts of different approaches, including both average and stepped trajectories. Calculations are provided based on the following:

On adoption of the Local Plan (Year4 - April 2021)

- Two Step Trajectory – Sedgefield Approach
- Two Step Trajectory – Liverpool/Residual Approach
- Average Trajectory - Sedgefield Approach
- Average Trajectory - Liverpool/Residual Approach

1.6 As set out in the National Planning Practice Guidance (PPG) the purpose of the five year supply is to provide an indication of whether there are sufficient sites available to meet the housing requirement set out in adopted strategic policies for the next 5 years. With regard to plan making, strategic policies should identify a 5 year housing land supply from the intended date of adoption of the plan. Following submission of the Local Plan for examination there have been updates to both the NPPF and the associated guidance. This section reflects this current national planning policy and guidance.

## **Five Year Requirement Figure**

1.7 The PPG states that the housing requirement figure to be used is that identified in strategic housing policies where the plan was adopted in the last 5 years. In other circumstances, the 5 year land supply will be measured against the area's local housing need, calculated using the standard method (840 dwellings per year when the Local Plan was drafted but 822 dwellings in the subsequent update to the relevant datasets). However, following the stage 1 hearings, and in response to the Inspector's subsequent letter, the Local Plan housing requirement figure has increased to 14,950 dwellings (an average of 997 dwellings per annum) and is the figure which the Inspector will consider when the Local Plan examination re-convenes. Should this level of housing provision be found sound by the Inspector this will be the figure in the adopted plan and is therefore the figure employed for calculation of the 5YHLS.

## **Selection of appropriate buffer**

1.8 The most recently adopted development plan is the Regional Spatial Strategy (RSS). Completions levels have fluctuated significantly over the period 2004 to 2018 as shown in Section 6. The figure most recently adopted in a development plan, that of the RSS, notwithstanding its revocation in 2013 (and somewhat higher figure than that of 450 in the RCUDP) has been used as the basis of the Authority Monitoring Reports. Extrapolating this approach to the Local Plan's base date demonstrates that completion levels have exceeded the requirement in RSS over this period. Prior to the recession around 2008, completions far exceeded the RSS requirement but declined after this date. When calculating the five year housing land supply up to 2015, a 5% buffer was employed given overall completion levels prior to this period. Given that completion levels have been below those in RSS immediately prior to and since this date, a period of 9 years, and in the spirit of boosting housing supply as required by the NPPF the buffer was raised to 20%.

## **Sources of Land Included in Five Year Supply**

1.9 The supply comprises extant planning permissions and a number of the land allocations in the Local Plan without planning permission, together with a windfall allowance. The most recent annual update of planning permissions data (31st March 2019) has been used. The analysis of these sources is covered in Section 6 of the HTP. Sites with planning permission considered

developable but not deliverable within the five year period have been excluded from the five year supply as shown in Table 19 below. Land allocations with planning permission are generally considered to meet the definition of deliverable and included in the 5YHLS. Many such sites are supported by developer information confirming delivery time-scales. Those allocations without planning permission but where evidence demonstrates they are likely to come forward in the five year period are also included in the five year supply. Evidence in relation to the allocations is continually being updated affecting the capacities of these sites. The position at mid February 2020 has been used for the purpose of the current 5YHLS calculation. The figures for windfalls have been updated to 31/3/19.

**Table 19: Planning Permissions Positioned after 5 year period**

HLA Ref	Planning Application Ref	Site Address	Status	Remaining Capacity	Comments
04746	13/00576	Land off, Pudsey Road, Todmorden.	Under Construction	23	Groundworks commenced & implemented but stalled. No survey response.
05223	17/00205	1 Jagger Green Hall, Jagger Green Lane, Holywell Green, Elland.	Outline	11	Recent outline pp. No survey response.
05322	17/00660	Stansfield Mill, Stansfield Mill Lane, Triangle, Sowerby Bridge.	Outline	20	Relatively recent Outline - No survey response.

#### **Position on Adoption of Local Plan**

1.5. The housing requirement for the five year period following adoption of the Local Plan is calculated for both the average and stepped trajectories. This covers the five years 2021/22 to 2025/26 (Years 4 to 8). Looking so far ahead, the level of completions for Years 2 and 3 as well as the level of planning permissions cannot be known. Assumptions have therefore been made that full delivery will occur for these years and the level of planning permissions will remain as at April 2019. Clearly there will be variations in these inputs to the calculations with consequential changes to the five year supply figure.

1.6. As shown in Tables 21a and 21b below the 5YHLS exceeds 5 years and therefore indicates that there will remain a 5YHLS on adoption of the Local Plan. The low level of underdelivery in Year 1 results in a very small difference between the Sedgefield and Liverpool/Residual approaches (and disappears altogether on rounding). However, the Council's preferred approach is the Liverpool one as any future underdelivery will make the provision of a 5YHLS and passing the Housing Delivery Test difficult. Current indications are that delivery for 2019/20 will be significantly below that of the previous year (currently around 190 dwellings for the first 2 quarters).

1.7. Tables 21c and 21d show that using an average trajectory having a 5YHLS on adoption is much less certain confirming the need to apply the Liverpool or residual approach.

**Table 20(a): Five Year Housing Land Supply Calculation as at Adoption of LP April 2021  
Two Step Trajectory (Sedgefield Approach)  
2021/22 to 2025/26 (Years 4 to 8)**

	<b>Number</b>	<b>Explanation/Source</b>
<b>Requirement</b>		
Five Year Housing Requirement	3480	Revised Local Plan Policy SD3 following stage 1 hearings 560 x 3 years and 900 x 2 years
Gross Completions 18/19 to 20/21	577	Only 18/19 known
Losses 18/19 to 20/21	22	Only 18/19 known
Net Completions 18/19 to 20/21	555	Gross completions less losses for Year 1 (Y2 & 3 not known)
Under Delivery Years 1 to 3	5	Requirement less delivery for Year 1. Not available for Years 2 & 3. Assumes full delivery for Years 2 and 3.
Overall five year requirement	3485	Requirement + underdelivery
20% Buffer	697	See HTP Section 7
Total five year requirement	4182	Requirement with underdelivery + 20% buffer
<b>Annual five year requirement</b>	<b>836</b>	Total requirement divided by 5 (rounded)
<b>Supply</b>		
Planning permissions	2146	HLA 31st March 2019. See HTP Section 6 & Table 13 for discounting. Assumes same level of pps on adoption (Year 4)
Windfalls	608	Trajectory Years 4 and 5 = 159.4 x 2 + Year 6 to 8 =96.4 x3
Land Allocations	4733	Deliverable Years 4 to 8. HTP App 3.
<b>Total Five Year Supply</b>	<b>7487</b>	<b>Sum of sources</b>
<b>Five Year Supply Figure</b>		
Number of Years Supply	<b>8.95</b>	Supply/5 Year Annual Requirement

**Table 20(b): Five Year Housing Land Supply Calculation as at Adoption of LP April 2021  
Two Step Trajectory (Liverpool/Residual Approach)  
2021/22 to 2025/26 (Years 4 to 8)**

	<b>Number</b>	<b>Explanation/Source</b>
<b>Requirement</b>		
Five Year Housing Requirement	3480	Revised Local Plan Policy SD3 following stage 1 hearings 560 x 3 years and 900 x 2 years
Gross Completions 18/19 to 20/21	577	Only 18/19 known when calculated
Losses 18/19 to 20/21	22	Only 18/19 known when calculated
Net Completions 18/19 to 20/21	555	Gross completions less losses for Year 1 (Y2 & 3 not known)
Under Delivery Year 1 to 3	5	Requirement less delivery for Year 1. Not available for Years 2 & 3. Assumes full delivery for Years 2 and 3.
Under delivery as residual	2	Under Delivery Years 1 to 3 divided by 12 Years multiplied by 5. Assumes full delivery for Years 2 & 3.
Overall five year requirement	3482	Requirement + underdelivery as residual
20% Buffer	696	See HTP Section 7
Total five year requirement	4179	Requirement with underdelivery + 20% buffer
<b>Annual five year requirement</b>	<b>836</b>	Total requirement divided by 5 (rounded)
Planning permissions	2146	HLA 31st March 2019. See HTP Section 6 & Table 13 for discounting. Assumes same level of pps on adoption (Year 4)
Windfalls	608	Trajectory Years 4 and 5 = 159.4 x 2 + Year 6 to 8 =96.4 x3
Land Allocations	4733	Deliverable Years 4 to 8. HTP App 3.
<b>Total Five Year Supply</b>	<b>7487</b>	<b>Sum of sources</b>
<b>Five Year Supply Figure</b>		
Number of Years Supply	<b>8.96</b>	Supply/5 Year Annual Requirement

**Table 20 (c): Five Year Housing Land Supply Calculation as at Adoption of LP April 2021  
Average Trajectory (Sedgefield Approach)  
2021/22 to 2025/26 (Years 4 to 8)**

	Number	Explanation/Source
<b>Requirement</b>		
Five Year Housing Requirement	4985	Revised Local Plan Policy SD3 following stage 1 hearings 997 pa
Gross Completions 18/19 to 20/21	577	Only 18/19 known
Losses 18/19 to 20/21	22	Only 18/19 known at Jan 2020 when calculated
Net Completions 18/19 to 20/21	555	Gross completions less losses. Only 18/19 known
Under Delivery Year 1 to 3	442	Requirement less delivery for Year 1. Not available for Years 2 & 3. Assumes full delivery for Years 2 and 3.
Overall five year requirement	5427	Requirement + underdelivery
20% Buffer	1085	See HTP Section 7
Total five year requirement	6512	Requirement with underdelivery + 20% buffer
Annual five year requirement	1302	Total requirement divided by 5 (rounded)
<b>Supply</b>		
Planning permissions	2146	HLA 31st March 2019. See HTP Section 6 and Table 13 for discounting. Assumes same level of pps on adoption (Year 4.)
Windfalls	608	Trajectory Years 4 and 5 = 159.4 x 2 + Year 6 to 8 =96.4 x3
Land Allocations	4733	Deliverable Years 4 to 8. HTP App 3.
Total Five Year Supply	7487	Sum of sources
<b>Five Year Supply Figure</b>		
Number of Years Supply	<b>5.75</b>	Supply/5 Year Annual Requirement

**Table 20 (d): Five Year Housing Land Supply Calculation as at Adoption of LP April 2021  
Average Trajectory (Liverpool/Residual Approach)  
2021/22 to 2025/26 (Years 4 to 8)**

	<b>Number</b>	<b>Explanation/Source</b>
<b>Requirement</b>		
Five Year Housing Requirement	4985	Revised Local Plan Policy SD3 following stage 1 hearings 997 pa
Gross Completions 18/19 to 20/21	577	Only 18/19 known
Losses 18/19 to 20/21	22	Only 18/19 known at Jan 2020 when calculated
Net Completions 18/19 to 20/21	555	Gross completions less losses. Only 18/19 known
Under Delivery Year 1 to 3	442	Requirement less delivery for Year 1. Not available for Years 2 & 3. Assumes full delivery for Years 2 and 3.
Under delivery as residual	184	Under Delivery Years 1 to 3 divided by 12 Years multiplied by 5. Assumes full delivery for Years 2 & 3.
Overall five year requirement	5169	Requirement + underdelivery
20% Buffer	1034	See HTP Section 7
Total five year requirement	6203	Requirement with underdelivery + 20% buffer
<b>Annual five year requirement</b>	<b>1241</b>	Total requirement divided by 5 (rounded)
<b>Supply</b>		
Planning permissions	2146	HLA 31st March 2019. See HTP Section 6 and Table 13 for discounting. Assumes same level of pps on adoption (Year 4.)
Windfalls	608	Trajectory Years 4 and 5 = 159.4 x 2 + Year 6 to 8 =96.4 x3
Land Allocations	4733	Deliverable Years 4 to 8. HTP App 3.
<b>Total Five Year Supply</b>	<b>7487</b>	<b>Sum of sources</b>
<b>Five Year Supply Figure</b>		
Number of Years Supply	<b>6.03</b>	Supply/5 Year Annual Requirement

**TASK 18 (c): A number of mixed use sites have no availability information. When updating the Housing Availability paper (EV62) Council to address this issue and obtain availability information.**

1.5 Further availability information on Mixed Use Sites has been compiled but complete coverage is difficult to achieve due to the relatively large number of owners on some sites. Where known this information has been entered into the Local Plan Site Allocations database. EV62 will be updated in due course. Much of this work is dependent on the initiatives being undertaken by the Council's Major Projects Team. To be completed by end March as per CC17 (Comprehensive List of Tasks and Modifications) update of 7/2/20.

#### **TASK 19: CONSIDERATIONS REGARDING 5 YEAR HOUSING LAND SUPPLY FIGURE:**

- Buffer to be applied after taking account of under delivery.
- Both Sedgfield and Liverpool approaches discussed. Make clear which approach the Council is using.
- Use definition of deliverability in NPPF 2019, Annex 2
- Consider whether a lapse rate be applied to full extant planning permissions for small sites bearing in mind definition in NPPF 2019
- Re-visit timing for allocated sites.

#### **Background**

1.6 At the stage 1 hearings the way in which the five year housing land supply had been calculated was explored. The Inspector raised a number of issues for which clarifications, refinements and/or updates are required. The last 3 bullet points of this Task are addressed in relation to Tasks 18 (a) and (b) above. Clarifications in relation to the first 2 bullet points are repeated below.

#### **Response (BPs 1 & 2)**

1.7 **BP 1 - Buffer to be applied after taking account of under delivery:** The calculation of the five year supply set out above under Task 18(b) complies with this approach.

1.8 **BP2 - Both Sedgfield and Liverpool approaches discussed. Make clear which approach the Council is using:** The calculation of the five year supply set out above under Task 18(b) makes clear the Council's preference is the Liverpool approach but also illustrates the implications of alternative approaches. This matter is also related to the stepping of the housing trajectory (Task 16: Justification for Stepped Trajectory - Technical Note submitted 7<sup>th</sup> February 2020).

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#### **TASK 20: TABLE 6.2 TO INCLUDE TOTAL NUMBER OF ALLOCATIONS, OTHER SOURCES OF SUPPLY AND LAPSE RATES FOR PLANNING PERMISSIONS.**

#### **Background**

1.9 Table 6.2 of the Local Plan deducts the various sources of housing supply from the overall housing requirement figure in order to calculate the level of new land allocations and requires updating. The Inspector also requests that it show lapse rates for planning permissions. The relevant extract from the draft update to the Housing Technical Paper is provided below. The paragraph numbers are those in the HTP.

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### **Extract from Updated Draft Housing Technical Paper**

6.1 The housing requirement is met through a range of sources of land supply. These are summarised in Table 7 (LP 6.2) with further detail provided in the following sections. Key sources are extant planning permissions, the windfall allowance and new land allocations, the first two of which were discussed at the Local Plan stage 1 hearings.

**Table 7: Revised Housing Requirement and Sources of Supply (Local Plan Table 6.2)**

	Dwellings	Notes
<b>REQUIREMENT</b>		
Housing Requirement 2018/19 to 2032/33	14,950	Stepped Trajectory <sup>**</sup> : 560 x 6 years 900 x 3 years 1482 x 6 years (Annual Average 997)
<b>SOURCES OF SUPPLY</b>		
Net Completions 18/19 (Year 1)	555	Gross completions less losses
Extant Planning Permissions	2,200	Housing Land Availability Database 31 <sup>st</sup> March 2019. Overall discount/lapse rate 38% (Major sites 54%, Small sites 10%).
Windfalls	1283	159 units Years 4 & 5 with 96 units per year for remainder of Plan period*
<b>SUB TOTAL</b>	<b>4038</b>	
Dwellings required on new land allocations	<b>10,912</b>	Overall requirement less sources of supply
Actual Allocations in Local Plan	11,512	
Total Supply	15,550	Actual Allocations in LP + Sources of Supply
Buffer	+600	Overall Requirement less Total Supply

\* Figures are rounded (159.4 and 96.4)

\*\*Figures do not sum to 14,950 due to rounding

**TASK 21: Council to make clear which documents on website in Local Plan Examination Library regarding Garden Suburbs are new. Also provide a note in the Local Plan news outlining this.**

1.10 To be completed by end March as per CC17 (Comprehensive List of Tasks and Modifications) update of 7/2/20.

**TASK 22: Note to be prepared setting out the key interventions that are required for the delivery of the two garden suburbs. This should include TA work and phasing details of the sites. The document should detail linkages between the two garden suburbs and implications of one of the garden suburbs not being delivered. Also include relevant parts of A641 improvement programme such as funding, trigger points and timescales.**

1.11 To be completed by end March as per CC17 (Comprehensive List of Tasks and Modifications) update of 7/2/20.