

Note on 5 Year Land Supply Methodology

31st March 2021

Planning Policy Team_14th May 2021

INTRODUCTION

This paper sets out how East Staffordshire Borough Council has calculated its assessment of housing land supply over the next 5 years. Calculations are based on Monitoring undertaken for the 31st March 2021 and from the start of the plan period.

Policy Context

National Planning Policy Framework (NPPF) published July 2018 paragraphs 70 - 75 provide the relevant guidance for assessing the 5 year housing supply.

Para 73 states that local planning authorities should identify and update annually a supply of specific deliverable sites sufficient to provide a minimum of five years' worth of housing against their housing requirement set out in adopted strategic policies, or against their local housing need where the strategic policies are more than five years old. The supply of specific deliverable sites should in addition include a buffer (moved forward from later in the plan period) of:

- a) 5% to ensure choice and competition in the market for land; or
- b) 10% where the local planning authority wishes to demonstrate a five year supply of deliverable sites through an annual position statement or recently adopted plan, to account for any fluctuations in the market during that year; or
- c) 20% where there has been significant under delivery of housing over the previous three years, to improve the prospect of achieving the planned supply¹.

To be considered deliverable, sites for housing should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years. In particular:

- a) sites which do not involve major development and have planning permission, and all sites with detailed planning permission, should be considered deliverable until permission expires, unless there is clear evidence that homes will not be delivered within five years (for example because they are no longer viable, there is no longer a demand for the type of units or sites have long term phasing plans).
- b) where a site has outline planning permission for major development, has been allocated in a development plan, has a grant of permission in principle, or is identified on a brownfield register, it should only be considered deliverable where there is clear evidence that housing completions will begin on site within five years.

Para 70 states that 'where an allowance is to be made for windfall sites as part of anticipated supply, there should be compelling evidence that they will provide a reliable source of supply. Any allowance should be realistic having regard to the strategic housing land availability assessment, historic windfall delivery rates and expected future trends'.

¹ From November 2018, this will be measured against the Housing Delivery Test, where this indicates that delivery was below 85% of the housing requirement

The Importance of the 5 year supply calculation

Paragraph 11 of the NPPF states that where there are no relevant development plan policies, or the policies which are most important for determining the application are out of date decisions should apply the presumption in favour of sustainable development.

Footnote 7 states that policies are out of the date if the local planning authority cannot demonstrate a five year supply of deliverable housing sites or where the Housing Delivery Test indicates that the delivery of housing was substantially below (less than 75% of) the housing requirement over the previous three years.

It is important to remember that the objective of the 5 year housing land supply calculation is not simply to achieve a 5 year supply of housing, but to maintain a minimum of 5 years' worth of housing supply on an ongoing basis.

The Council have been able to demonstrate that a 5 year housing land supply has been maintained since the Local Plan was adopted in October 2015.

Background Information

The National Planning Policy Framework sets out that local planning authorities should identify and update annually a supply of specific deliverable sites sufficient to provide five years' worth of housing against their housing requirements.

The Local Plan was adopted on 15th October 2015. The Inspector's report guides many of the components of the calculation particularly the housing requirement figure and expected delivery on allocated sites. A lot of discussion over windfall allowance and its incorporation into 5 year land supply figures took place at the Local Plan hearings and for the purposes of the examination the windfall component was removed to address concerns over the potential for double counting. However the Local Plan Inspector recognised that not including a windfall allowance in a 5 year land supply calculation was "commendably cautious".

Given that Paragraph 70 of the NPPF provides the framework for including a windfall allowance should the Borough Council choose to do so it is considered reasonable to include a windfall element post Local Plan adoption and this was introduced into the 30th September 2016 calculation. Local Plan Strategic Policy 4 includes a windfall requirement. To ensure there is no double counting with existing permissions, the figure is only included for years 4 and 5, when current permissions would have either commenced or lapsed. The figure of 90 dwellings per year reflects the Local Plan strategy. The methodology for calculating windfall rates is realistic having regard to the SHLAA, historic windfall delivery rates and expected future trends, and does not include residential gardens.

For the monitoring year 2015/16 completions fell short of the annual target by seven units. For monitoring years 2016/17, 2017/18, 2018/19 and 2019/20 the number of completions exceeded the housing requirement.

Completions Total's

Monitoring Periods Covered:

2012/13 (31.03.13) up to 2020/21 (31.03.21)

2012/13	270
2013/14	234
2014/15	352
2015/16	459
2016/17	535
2017/18	680
2018/19	756
2019/20	743

2020/21	689
Total COMPLETIONS - April 2012 to March 2021	4718

As a result, and in line with the Housing Delivery Test, the Council consider there is no longer a record of persistent under delivery. Therefore the buffer, which applies to the housing requirement and under delivery figures, has been reduced from 20% to 5%. This buffer will ensure choice and competition in the market for land as required by the NPPF.

Methodology for assessing the 5 Year Land Supply

The methodology involves the following:

- Bi-annual site visits to identify completions. This approach represents the most up to date and accurate way of assessing the way in which housing permissions move through the construction phase to completion.
- Evidence from applicants/agents/developers for sites of 10 or more dwellings has been incorporated into the calculation of the deliverable sites, ensuring a robust position.
- All planning permissions for 10 or more dwellings have been removed from the housing pipeline into Table A (large sites with permission). A bespoke approach to delivery has been applied to each site. This is a more accurate approach rather than applying a standard % lapse rate.

This calculation therefore provides the most up to date robust calculation based on data as at the 31st March 2021 and the following:

- This calculation uses the agreed² stepped trajectory housing requirement figures of 466 per annum for the first six years of the plan period.
- This calculation uses the agreed¹ stepped trajectory housing requirement figures of 682 per annum for the remaining 13 years of the plan period.
- Under delivery is spread over the five year period (Sedgefield).
- A 5% buffer to both the housing requirement and under delivery is included.
- A windfall figure of 90 per year for years four and five has been included.

The next 5 Year Land Supply update

The Borough Council recognises the importance of reviewing the 5 year land supply regularly. The Council will continue to consider any changes required from the revised NPPF and associated guidance, and will amend any components of the 5 year land supply as necessary.

² Adopted Local Plan Policy SP3

March 2021 - Five Year Housing Land Supply Calculation

(5 years being full monitoring years from 1st April 2021 to 31st March 2026)

Housing Requirement

- **682** dwgs/yr which is 3410 dwellings over 5 years (April 2021 – March 2026)
5 Year Requirement: 3410

NPPF: 5% buffer is calculated as 5% or **3581** (**3410x1.05**)

- The new five year requirement becomes: **3581** homes required over 5 years or an annual requirement of **716** dwellings.(3581/5)

Under-delivery

- Between April 2012 – March 2021 (6yrs at 466, 3yr at 682) we should have delivered **4842** dwellings (466x6 + 682x3).
- Past completions April 2012 – March 2021 = **4718** dwellings
- Under delivery = 124 dwellings (4842-4718)
- Plus 5% buffer on the under delivery = **130** (124x1.05)
- 130/5yrs= **26** per yr extra over 716 that's required = **742** (716+26)

New five year housing requirement incorporating under delivery is **3710** (742x5)

Housing Supply

- Housing pipeline (Small Sites with planning permission 0-9 units): **554**
- We adjust the figure to acknowledge a lapse rate of 10% **499**
- Proportion of large sites (10+units) with permission contributing to the 5YLS **2999**
(Proportion of large sites with planning permission – Table A*)
- Sites identified in tables B,C & D* **533**

Windfalls

90 Windfalls units expected for years 4 & 5 **180**

TOTAL **4211 dwgs**

4211 total supply/742 annual requirement = 5.67 years

* We don't apply a 10% lapse rate to these sites because the calculation recognises that only a proportion will come forward over the 5 year period. We have engaged with developers and applicants to arrive at the delivery rates.

Deliverable Sites

Table A: Large sites with permission

Application	Parish	Type of App	No of Units	Contribution to 5 Year Supply	Application Status as at March 2021	Comments as at March 2021 (unless stated otherwise)
Sites Under Construction as at March 2021						
Branston Locks (Lawns Farm) P/2012/01467	Branston/ Shobnall/ Tatenhill	OUT	2580	450	1795 is the remaining capacity from the Outline application for 2580 - Approved 14/04/2015	Regular discussions held with agent. Phase 1, 2 & 3 under construction with 2 left to be completed on phase 1 and 149 left on phase 2. Three developers on site. Phase 4 expected to commence shortly.
Branston Locks (phase 1) - P/2017/00923	Branston	RM	70		Reserved Matters (P/2017/00923) application for 70 units - Approved 24/04/2018	
Branston Locks (phase 2) - P/2018/00233	Branston	RM	201		Reserved Matters (P/2018/00233) application for 201 units – Approved 26/10/2018	
Branston Locks (phase 3) - P/2019/00756	Branston	RM	244		Reserved Matters (P/2019/00756) application for 244 units – Approved 17/12/2019	
Branston Locks (phase 4) - P/2020/00857	Branston/ Shobnall	RM	190		Reserved Matters (P/2020/00857) application for 190 units – Approved 25/02/21	
Land South of Lichfield Road (phase 3&4) - P/2018/00697	Branston	RM	392	287	Reserved Matters application Approved - 13/09/2018 for the final 392 units of the original 660 originally approved on the Outline application.	Phase 1 (64 units) – completed at March 2017. Phase 2 (204 units) – completed as at September 2020. Phase 3 & 4 – under construction with 287 left to be completed on site. Two developers on site
Beamhill P/2013/00429	Ouwoods	OUT	950	392	Outline Approved - 06/08/2013	As at March 2017, the agent confirmed completion rate of 50dpa increasing to 100-150 thereafter. Completion expected within 10years Two developers across the site. Works are now underway on the first phase
Beamhill (ph1) P/2020/00184	Ouwoods	RM	322		Reserved Matters application (P/2020/00184) for 322 units of the original 950 (phase 1) – Approved at Committee 28/08/2020	
Beamhill (ph1b) P/2020/00591	Ouwoods	RM	70		Reserved Matters application (P/2020/00591) for 70 units (phase 1b) – Approved 24/11/2020	
Land to the West of Uttoxeter (Phase 1c) - P/2017/00426	Uttoxeter	RM	119	17	P/2017/00426– Reserved Matters App for 119 – Approved 25/08/2017	Phase 1 (47 units) P/2014/00883 and Phase 1b (40 units) P/2016/00216 - both sites completed at September 2018
Land to the West of Uttoxeter (Phase 2) - P/2018/00510	Uttoxeter	RM	450	381	P/2018/00510 – Reserved Matters for phase 2 (final 450 units remaining from Outline of 700 units -	Phase 1c – 17 left to be completed on site. Phase 1d (44 units) P/2017/00572 – site

					P/2013/00882) – Approved 24/10/2018	completed at September 2019 Phase 2 – 381 left to be completed on site.
Forest Road P/2016/00321	Branston	RM	302	31	P/2012/01359 - Outline Application -Approved 12/02/2014 Reserved Matters Application Approved at Committee 24/06/2016. Additional 2 units approved within the site.	Construction well underway, 31 left to be completed on site. At March 20, one developer confirmed delivery of the site and would expect the site to be completed before June 2021
Imex Business Centre P/2020/00745	Shobnall	RM	125	125	Outline Application (P/2019/00056) for 144 units – Approved 30/04/2020 Reserved Matters application (P/2020/00745) for 125 units – Approved 22/12/2020	Site under construction, no completions on site yet At March 2020, the agent confirmed that they expect the site will be developed within the next 5 years
College Fields - Rolleston P/2018/00384	Rolleston on Dove	RM	100	98	Reserved Matters application approved 15/08/2018	Construction well underway, 98 left to be completed on site At March 2020, the developer confirmed the site is to be completed within three years.
Howards Transport, Clays Lane P/2018/01042	Branston	RM	86	86	Outline (P/2014/01460) Approved - 29/11/2016 Reserved Matters (P/2018/01042) application for 86 – Approved 02/04/2020	Site under construction, no completions on site yet Applicant confirmed 30 completions per year.
Model Dairy Farm P/2017/00590	Brizlincote	RM	77	23	Outline Approved- 16/05/14 Reserved Matters Application (P/2017/00590) – Approved 17/10/2017	Construction well underway, 23 left to be completed on site.
Land North of Rocester P/2018/01346	Rocester	RM	53	53	Outline Approved P/2014/00548 - 01/12/2016 Reserved Matters application for 53 approved at committee 22/02/2019	At March 2020, the developers confirmed they anticipate 30 sales per annum so would expect to be finished and off site by end of 2022
Hazelwalls P/2015/01497	Uttoxeter	FULL	429	360	Approved at committee 20/02/2019	Construction well underway, 400 left to be completed on site.
Former Alumasc Grundy P/2016/01847	Burton	FULL	203	101	Full Application Approved 18/06/2018	Construction well underway, 101 left to be completed on site.
Land off Aviation Lane P/2018/01291	Branston	FULL	128	128	Full Application Allowed at Appeal 07/10/2020	Site under construction, no completions on site yet

The Maltings P/2017/00244	Burton	FULL	90	90	Full Application Approved 22/12/2017	Site under construction, no completions on site yet
Land off Forest Road P/2014/01304	Outwoods/ Shobnall	FULL	83	83	Full Application for 83 units Approved at Committee – 18/02/2016 Full Application (64 affordable housing units) P/2019/00320 and S73 application (P/2019/00297) both approved 02/09/2020 - awaiting a S106	Site under construction, no completions on site yet Developer confirmed delivery, with the final completions expected in 2024.
Fivelands Allotment P/2019/01465	Stapenhill	FULL	64	64	Outline Application (P/2018/01451) for 49 units – Approved 12/05/2020 Full Application (P/2019/01465) for 64 affordable units – approved 06/11/2020	Site under construction, no completions on site yet Agent confirmed that they anticipate the site will be delivered in the next 5 years
Land off Tatenhill Lane Branston P/2017/01110	Branston	FULL	55	12	Outline Approved 10/04/2014 Full application P/2017/01110 approved 29/03/2018	Construction well underway, 12 left to be completed on site.
Former Highways Depot P/2019/00703	Uttoxeter	FULL	39	18	Full Application (39 Affordable Housing Units) Approved 04/03/2020	Construction well underway, 18 left to be completed on site.
Westlands Road P/2017/00355	Uttoxeter	FULL	18	10	Full Approved at committee 27/03/2019	Construction well underway, 10 left to be completed on site.
Rear of 38-54 Bridge Street Uttoxeter P/2013/00686	Uttoxeter	FULL	14	14	Full Approved 06/09/2013	Site under construction. As at March 21, the agent confirmed, further works expected in next 12 months
Mead Works P/2018/00143	Burton	FULL	14	14	Full Application Approved 16/07/2018	Site under construction, no completions on site yet
Rear of, 143 Horninglow Street P/2016/00128	Burton	FULL	32	32	Approved 08/12/2016 Full Application (P/2020/00401) for 32 apartments (amended plans) - awaiting determination	Site under construction. Revised application submitted.
Wychnor Bridges Farm, PA/07791/005/ SM	Wychnor	FULL	11	11	Full Application approved 26/08/2008. Application to extend time limit P/2011/00282/JPM – Approved 12/05/2011	As at March 2021, the agent confirmed delivery expected by March 25
The Refinery Burton P/2010/01361/M B	Burton	FULL	10	0	Full Approved 08/03/2011	As at March 21 the agent confirmed they have sold the site. Delivery is not expected in the next 5 years.
Hornton Road P/2017/00354	Horninglow & Eton	FULL	14	14	Full Approved at committee 12/03/2019.	Site under construction, no completions on site yet

65 - 68 High Street Burton P/2020/00376	Burton	FULL	13	13	Full Application – Approved 23/12/2020	Site under construction, no completions on site yet
Brookhouse Hotel P/2020/00255	Rolleston on Dove	FULL	10	10	Full Application – Approved 20/11/2020	Site under construction, no completions on site yet
Sites Not Under Construction as at March 2021						
Harbury Street P/2019/01511	Horninglow & Eton	RM	14	14	Outline Application (P/2016/00980) Approved 21/12/2018 Reserved Matters – Approved 18/03/2020	Agent confirmed expected completion by early 2021.
Craythorne Road P/2016/01507	Rolleston on Dove	OUT	34	23	Approved 28/06/2017 – for 32 retirement bungalows. Reserved Matters application (P/2020/00614) for 23 units - awaiting determination	Delivery of Reserved Matters scheme (23 units) to be delivered in 2022/23
Lynwood Road P/2017/01376	Branston	OUT	25	25	Approved 24/07/2018	Expect a Reserve Matters application to be submitted in 2021/22.
Telephone Exchange P/2020/01325	Burton	PRIOR APP	20	20	Approved 17/02/2021	
Torrington House P/2020/00608	Anglesey	PRIOR APP	14	14	Approved 07/09/2020	Change of use application to expect commencement shortly
Number of Units (gross)			6568³	3013		
Expected loss of dwellings (from the above applications)					14	
Total number of Units (net)					2999	

Table B: Large sites with a resolution to approve and awaiting s.106 sign off

Application	Parish	Type of App	No of Units	Contribution to 5 Year Supply	Application Status as at March 2021	Comments as at March 2021 (unless stated otherwise)
Branston Depot P/2012/00920	Branston	OUT	484	0	Resolution to Approve – 21/10/2013. S106 due to be signed shortly.	Site still occupied. As at September 2018 the agent confirmed that the site was sold for continuing commercial use. Residential units will not come forward in the next 5 years.
JCB Pinfold Road, Uttoxeter P/2017/01307	Uttoxeter	OUT	148	148	Outline Application P/2017/01307 - Resolution to Approve 24/04/2019. S106 due to be signed shortly.	Site cleared and being marketed.
Branston Leas - Phase 5 P/2019/00258	Branston	OUT	120	120	Resolution to Approve – 02/09/2020. S106 due to be signed shortly.	Application in addition to the original outline application for 660 units
Number of Units			752	268		

³ This total only includes the outline figure for Branston Locks, Beamhill and Glenville Farm.

Table C: Sites currently in the Local Plan with an application submitted for determination

Application	Parish	Type of App	No of Units	Contribution to 5 Year Supply	Application Status as at March 2021	Comments as at March 2021 (unless stated otherwise)
Churnet Farm, Rocester P/2017/00667 & P/2017/00668	Rocester	FULL & OUT	90	90	Full application for 20 dwellings (P/2017/00668) Outline application for 70 dwellings(P/2017/00667) – awaiting determination (expected to go to committee early 2021)	As at March 2017 the agent confirmed delivery of 90 units.
Bargates P/2020/01454	Burton	FULL	95	95	Hybrid Application (P/2020/01454) submitted in 2021 - awaiting determination.	Full Application (P/2017/01589) for 133 units – Withdrawn Jan 2021
		OPP	12	0		
Number of Units			197	185		

Table D: Sites in the Local Plan and other large sites without live applications

Application	Parish	No of Units	Contribution to 5 Year Supply	Application Status as at March 2021	Comments as at March 2021 (unless stated otherwise)
Glenville Farm (Harehedge Lane)	Outwoods	500	80	Revised application following the previous permissions (P/2015/00202 & P/2017/01556) expected to be submitted in Summer 2021	
Molson Coors, High Street	Burton	210	0		
Molson Coors, Middle Yard	Burton	300	0		
Derby Road, Burton	Horninglow & Eton	250	0		Council is in discussion with various land owners.
Number of Units		1260	80		

Total number of units	8777	3532	
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