

2015 DERBY STRATEGIC HOUSING LAND AVAILABILITY ASSESSMENT AND HOUSING TRAJECTORY EXPLANATORY DOCUMENT

1. Introduction and Background

This document explains the housing land supply position for Derby City. It explains the purpose and methodology of the Strategic Housing Land Availability Assessment (SHLAA) for the City and sets out the Council's short and long term housing supply position, including the five year supply of deliverable housing sites. This document should be read in conjunction with the specific site assessments and site maps which are provided for each SHLAA site on the City Council's website.

The National Planning Policy Framework (NPPF) requires local authorities to prepare and update a SHLAA in order to inform and monitor their housing land supply position. The Derby SHLAA is also a crucial piece of evidence which supports the new Derby City Local Plan (DCLP).

The three Derby HMA authorities (Derby City Council, Amber Valley Borough Council and South Derbyshire District Council) have worked closely to prepare their new local plans and have particularly co-operated with each other on housing need and supply matters to ensure that the needs across the wider HMA are met sustainably.

The SHLAA methodology was originally agreed at an HMA level through a Local Housing Partnership (LHP). The partnership includes officers from all three local authorities as well as the County Council, developers and agents. One of the key points agreed by the LHP was that a threshold would be applied to the assessment so that only sites which could deliver 10 or more dwellings would be included.

The HMA authorities have updated their SHLAAs over time to keep the land supply information up to date and this 2015 update is the most recent assessment for Derby City. The assessment reflects the position at June 2015 and takes account of site progress surveys which were carried out at the end of the 2014/15 monitoring year.

The purpose of the SHLAA is to identify land which could provide housing. It identifies whether a site is suitable for housing, whether it is, or will become available for housing and whether it will be viable to develop at any point in the future. The assessment also considers constraints to development and how they might be overcome and the number of dwellings which could be provided on each site.

The SHLAA is a part of the DCLP evidence base on housing and informs the housing trajectory, the five year land supply and has ultimately been used in helping to identifying sites for housing allocations in the Core Strategy.

There are distinct differences and relationships between the various documents and the diagram at Appendix 2 and the following sections below explain the purposes of the documents and how they relate to each other :

1.1 The SHLAA

The SHLAA is a key piece of evidence on housing land supply. It is a 'snapshot' in time which identifies sites that might provide housing and assesses their suitability, availability and viability to deliver new homes now or in the future. The SHLAA is not a policy document itself and is updated periodically to ensure that the information on sites is as up to date as possible.

1.2 The DCLP and the Core Strategy

The DCLP is being prepared in two parts and when these two documents are finally adopted they will provide the Council's policies for decision making on planning matters.

Part 1 of the DCLP, 'The Core Strategy' will set the Spatial Vision and Strategy for the City to 2028. It will set a housing provision target for the City and allocate strategic sites for development including some for housing development and some mixed use sites with housing components. Importantly, the Core Strategy will also establish a five year supply of deliverable housing sites and set a framework for maintaining the supply. A later 'Part 2 Plan' will allocate further smaller and non-strategic housing sites in order to meet the City's housing provision target by 2028. This document will also address outstanding Development Management matters.

A significant evidence base has been used in preparing the DCLP and the SHLAA is an important part of that evidence. Even when the component documents of the DCLP are adopted the SHLAA will continue to be updated to monitor the delivery of housing over the plan period.

Until the Core Strategy has been formally adopted the Council does not have a robust, tested housing provision target to plan against. All of the evidence which has been used to inform the Core Strategy indicates that there is only enough sustainable capacity in the City to provide about 11,000 new homes over the plan period (2011 to 2028). This evidence is considered to be the most up to date and robust indication of a housing target for Derby but it is acknowledged that until the Core Strategy has been found sound it cannot be given full weight.

However, given the above, the five year housing supply has been measured against a target of 11,000 new homes over this period of time. The results of this are set out in Section 3.

1.3 The Housing Trajectory

The Housing Trajectory is a table of sites which sets out how many dwellings are expected to be delivered in each year of the plan period on each site. It also indicates how many dwellings will be provided in the first five years of the delivery trajectory and how many will be built altogether by 2028.

SHLAA sites are included in the housing trajectory but it also includes an estimate for housing which will come about through windfall development and an assessment of housing which will happen on smaller sites (less than 10 dwellings) with planning permission. The trajectory also makes an estimate for losses to the housing stock which might happen in future due to demolition of housing or changes of use to other land uses.

The Housing Trajectory and five year housing supply are an important part of the evidence which will be used to demonstrate that the Core Strategy is 'Sound' when it is examined by a Government appointed Planning Inspector. Importantly, the trajectory reflects the housing supply as it would be on adoption of the Plan so that any interested parties can see which sites will provide the housing to meet the plan target.

It is also important to note that some sites have been assessed in the SHLAA as being unsuitable for housing due to policy constraints but have been included in the trajectory. For example, any site located within a Green Wedge is classed as being 'unsuitable' for housing at the current time. However, if the policy constraint is removed by the site being granted planning permission or the site being allocated for housing through the adoption of the Core Strategy the site will become suitable for housing.

For the reasons above it is not appropriate to attempt to reconcile the dwelling numbers in the SHLAA assessments with the numbers in the emerging Core Strategy or housing trajectory.

A Trajectory Graph is also included which indicates the net annual housing which is expected to be provided each year until 2028. It should be noted that this graph only includes sites which are considered to be developable on adoption of the Core Strategy. Further non-strategic site allocations will be made in a Part 2 Plan and these do not appear in the trajectory graph at this time.

A Housing Position Statement will be produced which will complement the SHLAA. The Position Statement will explain the how housing needs have been assessed, how the strategy for meeting those needs has been established and explain the land supply and its components in more detail.

2. Methodology and Content

2.1 SHLAA and Trajectory

The SHLAA site assessments which accompany this document assess the housing land supply position at June 2015.

Sites considered in the SHLAA include those promoted to the authority by land owners, developers and agents. They also include sites which have been identified by the Council and sites which have extant planning permissions but have not been built out. All of the HMA authorities have carried out a 'call for sites' exercise, encouraging sites to be promoted for inclusion in the assessment. The call for sites is an on-going exercise which allows developers, land owners or other parties to promote land for housing. As and when new sites are promoted or identified they are added to the assessment. Similarly, sites which have been developed are removed from the assessment.

There are three main component sections to the sites which have been assessed in Derby's SHLAA. They are:

- Major¹ sites with planning permission
- Major brownfield sites which do not currently have planning permission
- Major Mixed and Greenfield sites which do not have planning permission

Sites which have planning permission for housing are automatically considered to be in a suitable location by virtue of having been granted permission. Therefore, no detailed assessments have been carried out to determine their suitability for housing. However, sites with permission have been assessed in terms of if, when and how much housing is expected to be delivered on the site. This information has informed the housing trajectory.

All of the sites in the other two components of the SHLAA have been fully assessed in terms of their suitability, availability and viability for housing and the assessments as provided on the Council's website.

Appendix 1 shows the land supply tables and housing trajectory graph as and at adoption of the Core Strategy. For each site in the trajectory, the expected annual dwelling delivery rates are identified.

The status of sites in terms of their likely development can change over time and so the SHLAA is updated periodically. This means that, over time, sites can fall into and out of the land supply.

¹ Major Sites are those which will deliver 10 or more dwellings

The housing trajectory tables include a column for dwellings which are expected to be delivered in the current monitoring year (2015/16). These numbers are estimates based on the position on sites when they were surveyed in April 2015.

Other components of the land supply in the housing trajectory which sit outside the sites assessed in the SHLAA include:

Small Sites with Planning Permission (300 dwellings)

All of the specific sites included in the housing trajectory are major sites which have a dwelling capacity of 10 or more dwellings but there is a further category within the supply for small sites which have planning permission. This component of the supply is based on an assessment of over 490 dwellings which have extant planning permissions on sites of less than 10 dwellings. It should be noted that these small sites with planning permission are not windfalls. They are known sites of between 1 and 9 dwellings which have planning permission and an assessment has been made about how many of them will be delivered.

The assessment of small sites has considered whether the site is available and whether it is realistic or reasonable to assume that it will be developed. Where appropriate, some of the sites are included in the first five years of the housing trajectory. Some are included later because they may not be currently available and some are discounted because it is considered unlikely that they will be developed.

Windfall Allowance (900 dwellings)

The housing trajectory includes an allowance for windfall housing sites across the plan period and including an allowance within the first 5 years of the trajectory. The NPPF allows a windfall allowance in the first five years if an authority has compelling evidence that such sites have consistently become available in the area and will continue to provide a reliable source of supply. The City has historically seen high levels of windfall housing development and this is expected to continue as surplus brownfield land becomes available for development.

The windfall allowance is averaged out over the plan period at 75 dwellings per year meaning that 375 windfalls are expected to happen in the 5 year supply period.

Losses (-336 dwellings)

The housing target in the DCLP is that 11,000 new homes are provided between 2011 and 2028. It is expected that some losses will happen where dwellings are demolished or change use to other uses. Losses are not expected to be substantial because of the significant need for new homes in

the City. However to ensure that the new homes needed are provided by 2028 an estimate for losses is included in the land supply calculation.

The number of losses may vary year on year and is averaged out to 28 losses annually over the residual plan period including the current monitoring year.

2.2 The Five Year Housing Land Supply

There is no prescriptive method for calculating the five year supply set out in Government policy or guidance. Planning appeals and Local Plan Examinations have seen a variety of calculation methodologies accepted by Planning Inspectors. The calculation below is based on the methodology which the City Council feels is the most appropriate one to use.

In order to be classed as a 'deliverable' site, a site should be available now, be in a suitable location for development now and achievable with a realistic prospect that housing will be developed on the site within five years. Deliverable dwellings are expected to be completed within five years commencing on 1st April 2016, which is the start of the next monitoring year.

For the reasons discussed above, the five year housing supply has been calculated against a housing provision target of 11,000 dwellings from 2011 to 2028.

3. The Results

In terms of the current policy position, there are not currently enough deliverable housing sites in Derby to demonstrate a five year housing land supply. This is the case when considered against any 'reasonable' housing target, including the 11,000 suggested for the Core Strategy. Therefore, until the Core Strategy is adopted, it is unlikely that the City will have a five year supply.

The NPPF requires that an additional 5% buffer is applied to the five year supply. It also states that where there has been a persistent record of under delivery of housing a 20% buffer should be included, but it does not define the term persistent under delivery.

If a plan target of 11,000 dwellings from 2011 to 2028 is used then the Council has under delivered against that target since for the first few year of the plan period. Records indicate that the City has not met its annual housing requirement since 2008. It is therefore considered that there has been a record of persistent under delivery and a 20% buffer has therefore been applied to the basic five year supply requirement.

5 year supply requirement

Housing Requirement (2011-2028)	11,000
Annual Requirement (2011-2028)	647
Requirement for 5 Years (647x5)	3,235
20% Buffer (20% of 3,235)	647
Shortfall (2011/12-2015/16)	1,335
Total requirement (3,235+647+1,335)	5,217
Annual Total Requirement (for 5 Years)	1,043

Components of the 5 Year Land Supply (2016/17 to 2020/21)

Deliverable Major Sites with Planning Permission	3,018
Deliverable Brownfield Sites without Permission	521
Deliverable Greenfield Sites without Permission	1,720
Deliverable Small Sites with Planning Permission	300
Windfall Sites in first Five Years	375
Losses in first Five Years	-140
TOTAL LAND SUPPLY (2016/17 to 2020/21)	5,794

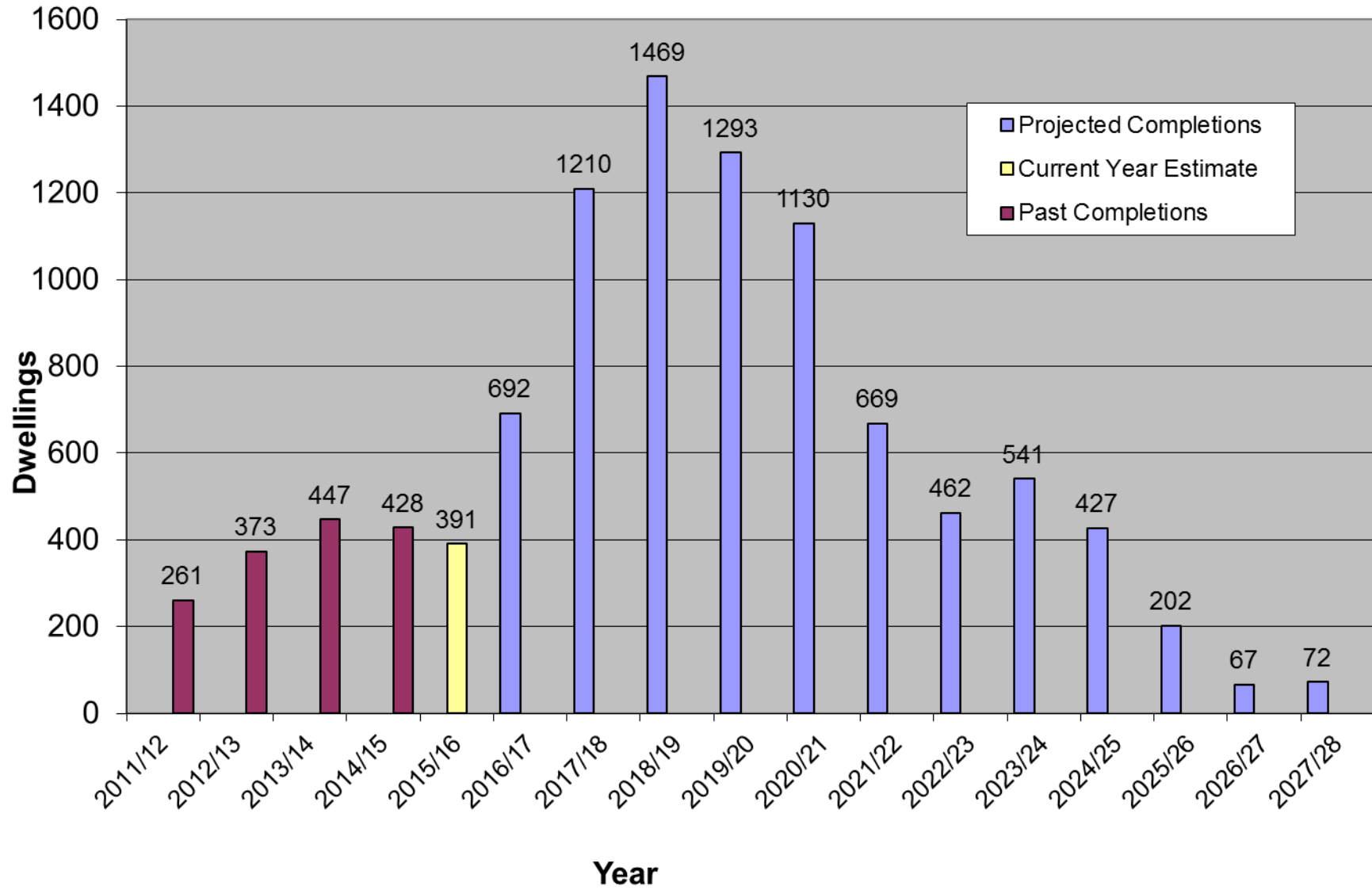
Five Year Land Supply (5,794/1,043) 5.55 years

The City will therefore have 5.5 years of deliverable dwellings upon adoption of the Core Strategy.

Appendix 1: Housing Trajectory and Graph

SHLAA ADDRESS	ADDRESS	G/F B/F Year	Expected Completions Current												DELIVERABLE DWELLINGS (5 Year Supply)	DEVELOPABLE DWELLINGS (15 Year Supply)
			1	2	3	4	5	6	7	8	9	10	11	12		
	TOTAL (GF and Mixed)	0	0	370	420	465	465	220	220	234	190	60	0	0	1720	2644
	TOTAL DWELLINGS ON MAJOR	339	565	1103	1362	1186	1043	622	415	494	380	155	20	25	5259	7370
	SMALL SITE PP	80	80	60	60	60	40								300	300
	WINDFALLS		75	75	75	75	75	75	75	75	75	75	75	75	375	900
	LOSSES	-28	-28	-28	-28	-28	-28	-28	-28	-28	-28	-28	-28	-28	-140	-336
	TOTALS	391	692	1210	1469	1293	1130	669	462	541	427	202	67	72	5794	8234

Derby City Housing Trajectory 2011-2028



APPENDIX 2 : HOUSING LAND SUPPLY DOCUMENT RELATIONSHIPS

