

Matter 17 The Supply and Delivery of Housing Land

Issue-Whether the approach towards the supply and delivery of housing land is justified, effective and consistent with national policy

Relevant policy: Policy CS(R)3

Q17.1 What is the estimated total supply of new housing in the plan period 2014-2037 and how does this compare with the requirement?

Policy CS(R)3 sets a net requirement of at least 8,050 (net) additional dwellings during the period 2014 to 2037.

Policy RD1 Residential Allocations and the table provided within paragraph 9.4 of the DALP appear to provide the Council's supply information. This table suggests that there have been 2,639 completions (2014-2019), that there are 595 dwellings under construction (2019) and that there are 1,161 dwellings with planning permission (2019). This leaves 3,655 dwellings still to be delivered through allocations and windfalls. There appears to be 4,263 dwellings allocated in Runcorn and 2,565 dwellings allocated in Widnes and Hale, giving a total of 6,828 dwellings. However, it is noted a couple of allocations are identified as under construction, and it is not apparent from the plan how many of the allocations may have permission, therefore it is assumed there is a level of double counting.

The AMR – Housing 2020 provides a more up to date version of this data, although it is not as easy to draw out the information required to calculate the total supply. Appendix B of the document setting out the Residential Land Availability identifies a remaining capacity of 3,699 dwellings.

Q17.2 What is the estimated total supply in the plan period from:

a) Completions since 2014

Table 1 below shows the net completions since 2014.

Year	Net Completions¹ (CLG)	Net Completions (Halton)
2014/15	526	495
2015/16	536	480
2016/17	699	698
2017/18	369	369
2018/19	597	597
2019/20	601	600
Total	3,328	3,239
Average	555	540

b) Sites under construction

The AMR – Housing 2020 states that monitoring from 2019/20 shows that there are 18 sites currently under construction. On these, there are a total of 117 properties under

¹ Table 122 Net additional dwellings¹ by local authority district
(<https://www.gov.uk/government/statistical-data-sets/live-tables-on-net-supply-of-housing>)

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construction, with a total of **505 dwellings (gross) remaining**. It is not apparent what the net figure may be.

c) Planning permissions

The AMR – Housing 2020 states that 653 dwellings (gross) were granted planning permission in 2019/20; with 0 lost through demolition, 3 lost through conversion and 5 lost through change of use, leaving a total of 645 dwellings (net). It goes on to state that in total, that gives 50 sites with **extant full permission, with a remaining capacity for 1,898 dwellings**. 28 of these sites were in Runcorn, with a remaining capacity for 1470 dwellings and 22 sites were in Widnes, with remaining capacity for 428 dwellings. It is not clear from the report how many dwellings have extant outline consent.

d) Other commitments

The HBF is not aware of any information in relation to other commitments.

e) Proposed strategic allocations

Based on Policy RD1:

Runcorn (Strategic) Allocations – 2,486 dwellings² (1,596 with pp and 318 u/c)

Widnes (Strategic) Allocation – 2,125 dwellings

However, some allocations now appear to have planning permission or be under construction, as set out in Appendix C of the AMR so there may be some significant overlap and therefore double counting in terms of supply. For example, several sites that make up SRL 4: Sandymoor have planning permission and one is under construction.

f) Other site allocations

Based on Policy RD1:

Runcorn (Non-Strategic) Allocations – 1,777 dwellings³ (166 with pp and 144 u/c)

Widnes (Non-Strategic) Allocation – 440 dwellings⁴ (166 u/c)

However, some allocations now appear to have planning permission or are under construction, as set out in Appendix C of the AMR so there may be some significant overlap and therefore double counting in terms of supply.

g) Windfall sites

The Council do not appear to include an allowance for windfall within their supply calculations and suggest within paragraph 7.30 that such an allowance may be problematic as it could risk double-counting.

Q17.3 What are the assumptions about the scale and timing of supply and annual rates of delivery from these various sources? Are these realistic? How do they compare to previous rates?

² 572 (if do not include sites with planning permission or under construction)

³ 1,467 (if do not include sites with planning permission or under construction)

⁴ 274 (if do not include sites with planning permission or under construction)

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The 2017 SHLAA sets out standard build out rates and lead in times these can be found in Table 7.1. It is not known if the Council has updated the information provided in this report, to ensure that it is still appropriate. The HBF would strongly recommend that the Council works closely with developers and the homebuilding industry to ensure that the rates of delivery reflect the realities of the sites included in the supply.

Q17.4 How has flexibility been provided in terms of the housing land supply? Are there other potential sources of supply not specifically identified? Can this be specified?

The HBF considers that this is a question for the Council to answer, the HBF also believes that it is important the Council ensures that there is a flexibility in the supply.

Q17.5 In overall terms, would the Local Plan realistically deliver the number of houses required over the Plan period?

The HBF cannot determine whether the Local Plan would realistically deliver the number of homes required from the evidence provided by the Council at this time. It is not apparent that there is sufficient supply of housing, and the HBF does not consider that there is sufficient evidence to determine that the supply is deliverable and developable as set out in the PPG⁵.

Q17.6 Has there been an under delivery of housing? In terms of a buffer for a five-year supply of housing sites, should this be 5%, 10% or 20% in relation to paragraph 73 of the NPPF?

Based on paragraph 73 of the NPPF there has not been a significant under delivery of housing over the previous three years, Halton has a Housing Delivery Test result of 207%⁶. However, it is not apparent from the Council's Plan if the Council wishes to demonstrate a five-year supply of deliverable sites through a the recently adopted plan, so the 5% or the 10% buffer may apply.

Q17.7 How would any shortfall since 2014 be dealt with?

The HBF would expect, if there was any shortfall, for this to be addressed using the Sedgefield method. The Sedgefield method is considered to be in compliance with the Governments ambitions to boost housing supply, and PPG⁷, which states that *'the level of deficit or shortfall will need to be calculated from the base date of the adopted plan and should be added to the plan requirements for the next 5 year period (the Sedgefield approach), then the appropriate buffer should be applied'*. If the Council wishes to deviate from this approach, they need to provide the justification.

Q17.8 What would the requirement be for a five-year supply including a buffer and accommodating any shortfall since 2014?

The HBF consider that the proposed housing requirement is not appropriate and should indeed be higher. However, if the assumed housing requirement of 350dpa is used along with the 5% buffer the HBF consider that the five-year housing requirement would be 1,838⁸.

⁵ PPG ID: 68-020-20190722 & ID: 68-007-20190722

⁶ HDT 2020

⁷ PPG ID: 68-031-20190722

⁸ = $(5 \times 350) + ((5 \times 350) \times 0.05) = 1,837.5$

**Q17.9 Would the Local Plan realistically provide for a five-year supply on adoption?
Will a five-year supply be maintained?**

The HBF does not consider that sufficient evidence has been provided by the Council to determine whether the Local Plan would realistically provide for a five-year housing supply on adoption. The SHLAA and the five-year housing land supply do not appear to have been updated since 2017.

Q17.10 Is the target of 30% of new residential development to be delivered on previously developed land realistic and achievable? How does this compare to previous rates of delivery?

The AMR – Housing 2020 states that in 2019/20, 26% of completions were on Greenfield sites, a slight increase compared to 17% of completions the previous year. This suggests that brownfield sites have been developed in Halton. It also noted that Policy RD1 does identify a number of brownfield sites for allocation. However, there are viability concerns around the deliverability of brownfield sites going forward and it is noted that the Whole Plan Viability Assessment states in relation to brownfield site that *'the Council should be cautious about relying on such sites for the delivery of housing (for example within the assessment of the 5-year land supply) unless there is evidence that the site is actually deliverable. This would include where sites have a recent planning consent or there is public sector intervention'*.

Q17.11 Is the approach to housing density justified, effective and consistent with national policy?

Policy CS(R)3 sets a minimum density of 30dph, and 40dph in more accessible locations (close to town, district or local centres or transport interchanges). It also provides some flexibility for developments where such densities would be detrimental to local character or amenity or where there are site constraints. The HBF generally considers that this policy is consistent with national policy, however, it would be beneficial for greater clarity to be provided in relation to how the density will be applied in relation to the net developable area of the site, particularly for larger sites where there may be a lower developable area due to other on-site requirements.