

Home Builders Federation

Statement on additional evidence and modifications

Housing requirement and plan period

1. Council continuing to use the 618 dpa as their housing requirement. However, the Council can only rely on their assessment housing needs for a period of two years (PPG - paragraph: 008 Reference ID: 2a-008-20241212), which ended on the 25 November 2024. Therefore, the Council should be looking to update their housing requirement to 631 dpa as well as rebasing the start date of their local plan to 2024. It is also the case that if the plan is found sound it will be adopted in 2025/26. This will mean that the plan period is less than 15 years as required by paragraph 22 of the NPPF and consideration will need to be given as to whether this should be extended by a year to 2039/40 in order to be consistent with national policy. If the inspector considers it appropriate to use the 618 dpa then the plan period will need to remain as 2022/23, the year in which it was submitted for examination.
2. On the basis of an up to date local housing needs assessment across a plan period of 2024/25 to 2039/40 would be 10,097 dwellings. If the current end date for the plan of 2038/39 is used the total need would be 9,465 dwellings. Should either period be used there will be a shortfall against total housing needs for the plan period. Without an estimated supply for 2039/40 it is not possible to state under supply for the longer plan period but for a plan ending in 2038/39 the shortfall is 61 dwellings. If the inspector considers that the Council should use the recruitment and plan period as submitted, then the shortfall in delivery is substantial at 677 dwellings.

Housing Land Supply

Supply in 1 to 5 years

3. HBF have concerns regarding the delivery expectations of the following sites:



- *AT3/007, ST1/037 and ST3/004.* No Statements of Common Ground (SoCG) or evidence provided to support assumption that are deliverable. Whilst HBF understand that all three of these sites are in the ownership of SBC, this does not circumvent the need to provide clear evidence to the examination that these sites can be delivered as suggested. The fact is that all three of these sites are expected to start delivering new homes from 2026/27, yet no additional information has been provided setting out progress with regard to the delivery of this site since the officer site assessments set out in SSL002.
- *SE1/024.* Delivery expected from 2026/27 with SoCG noting delivery by 2027, significantly earlier than the 2032 assumption in the previous SoCG. Appears ambitious given no planning application has been submitted. Delivery from planning permission to first homes on sites of 100 to 50 units in Lichfield's 'Start to Finish'¹ is 3 years. No indication as to whether developer will seek outline permission and come back for reserved matters. If this is the case, then the grant of full planning permission and commencement is likely to be at least 18 months. Needs a detailed timetable indicating delivery expectations for this site if it is to be included in the five-year land supply. No indication as to whether developer interest in the site.
- *AT3/016.* SoCG states that planning permission is to be submitted in September 2024. No update provided as to whether this has been achieved. Raises significant doubt as to whether a start date on 2025/26 is possible. Further information is required.
- *AT1/002.* No planning permission received and given that this is a Green Belt allocation it requires the local plan to be adopted before any application can be considered. Delivery starting in 2025/25 therefore doubtful especially as no indication of developer interest in the site in the SoCG.
- *ST4/025.* Remains in years 1 to 5 in the Housing Trajectory but Topic Paper 8 states in the table on page 7 that this is now expected to come forward in years 11-15.
- *SC1/021.* Total of 250 homes with site expected to commence in 2028/29. No SoCG has been produced to support the inclusion of this site within years 1 to 5.

¹ <https://lichfields.uk/content/insights/start-to-finish-3>

- *LS1/024*. No SoCG has been produced to support the inclusion if this site within years 1 to 5.
 - *SE1/020*. No SoCG has been produced to support the inclusion if this site within years 1 to 5.
 - *SE1/025*. No SoCG has been produced to support the inclusion if this site within years 1 to 5.
 - *SS1/002*. No SoCG has been produced to support the inclusion if this site within years 1 to 5.
4. Without the necessary evidence HBF would question the Council's assessment that this sites are deliverable. If these sites are not considered to be deliverable this will impact upon the rolling 5 year housing land supply.

Supply 6 to 10 years and 11 to 15 years.

5. New SOCGs for these periods were only provided to interested parties on the 9th December making it difficult to comment on whether appropriateness of the timescales for these sites in the trajectory in this statement. HBF will therefore reserves the right to provide comments at the hearing if necessary. However, HBF notes that there are discrepancies between the trajectory and the proposed main modifications. For example, the main modifications indicate that:
- SN1/012 will come forward between 2034 and to 2039 but the trajectory in HOU12 has it commencing in 2031/32.
 - SC1/021 will come forward between 2034 and to 2039 but the trajectory in HOU12 has it commencing in 2028/29.
6. The trajectory will therefore need to be amended in order to be consistent with the proposed modifications.
7. Amending the trajectory as indicated will impact upon the rolling 5 year housing land supply set out in the appendices to this statement.

Five-year land supply

8. Appendices 1 and 2 to this statement provides a rolling assessment of the Council's five year land supply for both a 618 dpa with the plan period starting in

2022/23 and 631 dpa with a plan period starting in 2024/25. In considering whether there will be a five year housing land supply on adoption the HBF agrees with the Council that a 20% buffer is required by national policy. Separate trajectories are provided for both the Sedgefield and Liverpool approach to assessing the five year housing land supply. However, HBF consider that the assessment should be based on the Sedgefield approach as indicated by paragraph 22 of the Housing Supply and Delivery section of PPG (ref. 68-031-20190722).

9. What is notable is that on adoption the Council can only show a five year housing land supply under one scenario – plan period starting in 2024 using the 631 dpa. On the basis of the other potential approaches the Council will only have a five year land supply on adoption of 5.07 years. For each of the other scenarios set out in Appendix 1 the Council will not have a five year land supply on adoption or at any point across the plan period.

Review policy

10. Whilst HBF welcome review policy we are concerned that the approach being suggested is not consistent with Annex 1 of the December 2024 National Planning Policy Framework (NPPF24). On the basis that this plan was submitted prior to the 12th of March 2025 then it is necessary to consider paragraph 236 of the NPPF24 which states:

“Where paragraph 234b applies, if the housing requirement in the plan to be adopted meets less than 80% of local housing need the local planning authority will be expected to begin work on a new plan, under the revised plan-making system provided for under the Levelling Up and Regeneration Act 2023 (as soon as the relevant provisions are brought into force in 2025), in order to address the shortfall in housing need.”

11. The housing need for Spelthorne under NPPF24 is 793 dpa and therefore 80% of that figure is 635 dpa and as such paragraph 236 is applicable to Spelthorne. Therefore, the proposed review policy which states that a comprehensive review will take place by the end of 2026 is inconsistent with what is required of the Council under the transitional arrangements. The review policy should set out

that the Council will start preparing a new local plans under NPPF24 immediately on the adoption of this local plan if it found sound.

12. With regard to whether sanctions are required in policy to ensure a new plan is prepared, the HBF generally consider paragraph 78c of the NPPF to provide adequate incentive. This requires a 20% buffer to be applied on all plan adopted under a previous version of the Framework whose average annual housing requirement is 80% less than local housing needs using the NPPF24. However, given that Spelthorne BC are already required to include a 20% buffer due to past undersupply HBF questions whether this is sufficient sanction. HBF would suggest that should a new plan not be brought forward within agreed timescales then the for the purposes of assessing land supply the latest standard method will be used.

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Appendix 1 – 618 dpa from 2022/23

Sedgefield

	22/23	23/24	24/25	25/26	26/27	27/28	28/29	29/30	30/31	31/32	32/33	33/34	34/35	35/36	36/37	37/38	38/39
Req.	618	618	618	618	618	618	618	618	618	618	618	618	618	618	618	618	618
Cumulative	618	1,236	1,854	2,472	3,090	3,708	4,326	4,944	5,562	6,180	6,798	7,416	8,034	8,652	9,270	9,888	10,506
Delivery	138	287	835	824	916	674	459	877	693	514	533	486	639	604	536	431	383
Cumulative	138	425	1,260	2,084	3,000	3,674	4,133	5,010	5,703	6,217	6,750	7,236	7,875	8,479	9,015	9,446	9,829
Surplus/ deficit	-480	-811	-594	-388	-90	-34	-193	-	-	-	-48	-180	-159	-173	-255	-442	-677
Five year req.	3,090	3,090	3,090	3,090	3,090	3,090	3,090	3,090	3,090	3,090	3,090	3,090	3,090				
Add deficit/ surplus	3,090	3,570	3,901	3,684	3,478	3,180	3,124	3,283	3,090	3,090	3,090	3,138	3,270				
Buffer	618	714	780	737	174	159	156	164	155	155	155	157	164				
Total req.	3,708	4,284	4,681	4,421	3,652	3,339	3,280	3,447	3,245	3,245	3,245	3,295	3,434				
Five year supply	3,000	3,536	3,708	3,750	3,619	3,217	3,076	3,103	2,865	2,776	2,798	2,696	2,593				
Surplus/ deficit	-708	-748	-973	-671	-33	-122	-204	-344	-380	-469	-447	-599	-841				
5YHLS	4.05	4.13	3.96	4.24	4.95	4.82	4.69	4.50	4.42	4.28	4.31	4.09	3.78				

Liverpool

	22/23	23/24	24/25	25/26	26/27	27/28	28/29	29/30	30/31	31/32	32/33	33/34	34/35	35/36	36/37	37/38	38/39
Req.	618	618	618	618	618	618	618	618	618	618	618	618	618	618	618	618	618
Cumulative	618	1,236	1,854	2,472	3,090	3,708	4,326	4,944	5,562	6,180	6,798	7,416	8,034	8,652	9,270	9,888	10,506
Delivery	138	287	835	824	916	674	459	877	693	514	533	486	639	604	536	431	383
Cumulative	138	425	1,260	2,084	3,000	3,674	4,133	5,010	5,703	6,217	6,750	7,236	7,875	8,479	9,015	9,446	9,829



Surplus/ deficit	-480	-811	-594	- 388	-90	-34	-193	66	141	37	-48	-180	-159	-173	-255	-442	-677
Five year req.	3,090	3,090	3,090	3,090	3,090	3,090	3,090	3,090	3,090	3,090	3,090	3,090	3,090				
Add deficit/ surplus	3,090	3,240	3,360	3,302	3,239	3,118	3,101	3,159	3,065	3,031	3,073	3,114	3,190				
Buffer	618	648	672	660	162	156	155	158	153	152	154	156	160				
Total req.	3,708	3,888	4,032	3,963	3,401	3,274	3,256	3,317	3,218	3,183	3,227	3,270	3,350				
Five year supply	3,000	3,536	3,708	3,750	3,619	3,217	3,076	3,103	2,865	2,776	2,798	2,696	2,593				
Surplus/ deficit	- 708	-352	-324	-213	218	-57	-180	-214	-353	-407	-429	-574	-757				
5YHLS	4.05	4.55	4.60	4.73	5.32	4.91	4.72	4.68	4.45	4.36	4.34	4.12	3.87				

Appendix 2 – 631 dpa from 2024/25

Sedgefield

	24/25	25/26	26/27	27/28	28/29	29/30	30/31	31/32	32/33	33/34	34/35	35/36	36/37	37/38	38/39
Req.	631	631	631	631	631	631	631	631	631	631	631	631	631	631	631
Cumulative	631	1262	1893	2524	3155	3786	4417	5048	5679	6310	6941	7572	8203	8834	9465
Delivery	835	824	916	674	459	877	693	514	533	486	639	604	536	431	383
Cumulative	835	1659	2575	3249	3708	4585	5278	5792	6325	6811	7450	8054	8590	9021	9404
Surplus/ deficit	0	0	0	0	0	0	0	0	0	0	0	0	0	0	-61
Five year req.	3155	3155	3155	3155	3155	3155	3155	3155	3155	3155	3155				
Add deficit/ surplus	3155	3155	3155	3155	3155	3155	3155	3155	3155	3155	3155				
Buffer	631	631	158	158	158	158	158	158	158	158	158				
Total req.	3786	3786	3313	3313	3313	3313	3313	3313	3313	3313	3313				
Five year supply	3708	3750	3619	3217	3076	3103	2865	2776	2798	2696	2593				
Surplus/ deficit	-78	-36	306	-96	-237	-210	-448	-537	-515	-617	-720				
5YHLS	4.90	4.95	5.46	4.86	4.64	4.68	4.32	4.19	4.22	4.07	3.91				

Liverpool

	24/25	25/26	26/27	27/28	28/29	29/30	30/31	31/32	32/33	33/34	34/35	35/36	36/37	37/38	38/39
Req.	631	631	631	631	631	631	631	631	631	631	631	631	631	631	631
Cumulative	631	1262	1893	2524	3155	3786	4417	5048	5679	6310	6941	7572	8203	8834	9465
Delivery	835	824	916	674	459	877	693	514	533	486	639	604	536	431	383
Cumulative	835	1659	2575	3249	3708	4585	5278	5792	6325	6811	7450	8054	8590	9021	9404
Surplus/ deficit	204	397	682	725	553	799	861	744	646	501	509	482	387	187	-61
Five year req.	3155	3155	3155	3155	3155	3155	3155	3155	3155	3155	3155				

Add deficit/ surplus	3155	3082	3002	2871	2825	2958	2848	2796	2817	2832	2877				
Buffer	631	616	150	144	141	148	142	140	141	142	144				
Total req.	3786	3699	3152	3014	2967	3105	2990	2936	2958	2974	3021				
Five year supply	3708	3750	3619	3217	3076	3103	2865	2776	2798	2696	2593				
Surplus/ deficit	-78	51	467	203	109	-2	-125	-160	-160	-278	-428				
5YHLS	4.90	5.07	5.74	5.34	5.18	5.00	4.79	4.73	4.73	4.53	4.29				