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10/05/19

Dear Kathryn Stule,

SUNDERLAND CORE STRATEGY: INSPECTOR'S MATTERS, ISSUES AND QUESTIONS

Thank you for consulting with the Home Builders Federation on the Sunderland Core Strategy and Development Plan Inspector's Matters, Issues and Questions.

The HBF is the principal representative body of the house-building industry in England and Wales. Our representations reflect the views of our membership, which includes multi-national PLC's, regional developers and small, local builders. In any one year, our members account for over 80% of all new "for sale" market housing built in England and Wales as well as a large proportion of newly built affordable housing.

We would like to submit the following comments upon selected questions posed within the Inspector's Matters, Issues and Questions.

Yours sincerely,



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Matter 3: Housing and Employment Objectively Assessed Needs (OAN) and Requirements

Session 3 – 09.30 Wednesday 22 May 2019

This matter explores whether the amount of housing and employment land proposed in the LP is appropriate to meet the needs of the area to 2033. The housing OAN is derived from the Strategic Housing Market Assessment (SHMA) Update 2017 (SD.23) and SHMA Addendum 2018 (SD.24). The Employment Land Reviews (ELR) (SD.37 and 38) identify a need for between 95 and 115 ha of employment land. The Council indicate that SD.38 justifies an employment land requirement at the lower end of the range.

Issues

1. The Housing OAN and Requirement

1.1. Does the evidence base support the requirement for housing of 745 dwellings per annum (dpa) or 13,410 dwellings for the LP period taking into account demographic and economic factors, market signals and affordable housing need?

The policy figure is in line with the SHMA 2018 Addendum which identifies an Objectively Assessed Need (OAN) figure of 745 dwellings each year or 13,410 dwellings over the plan period. This uses the 2014-based population and household projections as the starting point, which over the period 2015-2033 suggest an increase of 9,965 households which equates to 570 net additional dwellings each year. Edge Analytics had then provided alternative demographic scenarios and Arc4 has provided further consideration to determine the OAN.

The SHMA 2017 provides some evidence in relation to market signals, however, it states that there are no indicators prompting a need for an adjustment to the OAN to reflect the market signals. The SHMA 2018 states that whilst the Rental Affordability Ratio (RAR) for Sunderland is 26.6% this has been reducing and is influenced by the student rental market, so whilst it acknowledges that this would be in line with the LPEG guidance for an uplift, it does not consider it would be appropriate. The LPEG guidance states that if the RAR is at or above 25% and less than 30%, then a 10% uplift should be applied. The HBF note that whilst evidence in the SHMA 2017 does suggest a decrease in the RAR, the RAR has been above 25% for the entire 5 year period covered by the evidence.

The SHMA 2018 highlights that most of the demographic scenarios do not support employment growth. The SHMA suggests an upward adjustment to take account of employment growth to 745 dwellings each year, based on the Jobs-led Experian SENS A scenario. This uplift to support economic growth is generally supported.

It is noted that the SHMA 2017 suggests there is an annual imbalance of 542 affordable dwellings each year, this is also set out in para. 2.28 of the SHMA 2018. This represents 73% of the housing target. This suggests that further consideration needs to be given to the potential for a higher housing figure. It is therefore imperative that the Council consider how it can realistically address the affordable housing needs of the area, potentially through increasing the housing requirement.

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1.2 Is the approach to calculating the OAN and housing requirement reasonably consistent with other local planning authorities (LPAs) in the region?

The HBF do not wish to comment on this, at this time.

1.3 Should the housing requirement be higher: a. To support job growth, including that at the International Advanced Manufacturing Park (IAMP) and/or b. To support an uplift in Household Representative Rates for 25 to 44 age range and to help address the affordable housing imbalance?

The Council states in para 4.13 of the Local Plan that IAMP is an important driver for economic growth, which will have a consequential impact on demand for new housing in the northern part of the city and increase the need for 3 and 4 bed houses. The HBF consider that the Council should consider an uplift to account for the need to provide further housing associated with developments at IAMP.

The HBF is concerned that no adjustment has been made in respect of household representative rates (HRRs). The implication of this bias is that the latest projections continue to be affected by suppressed trends in HRRs associated with the impacts of the economic downturn, constrained mortgage finance, past housing undersupply and the preceding period of increasing unaffordability which particularly affected younger households (25 to 44). The SHMA 2018 states that the 2014-based rates are broadly consistent with the 2012-based rates, with the 2014 figures providing a slight increase in dwelling requirements.

The SHMA 2018 notes that an increase in the HRR is increasingly unrealistic given changes in the housing market affecting younger people. However, the statistics used to support this notion, could be read to support the need for these issues to be addressed just as much as they can be read for their trend value.

The HBF notes that this group were particularly hard-hit by the recession and as such the HRRs are likely to have been significantly depressed. Indeed by 2014 the proportion of 25 to 34 year olds who were home-owners had dropped significantly from a decade earlier. The HBF considers it would be prudent to consider an uplift in HRRs amongst this group, to reverse this negative trend. It is also notable that the Government is actively trying to boost home ownership, particularly amongst younger age groups through initiatives such as 'Help to Buy' and 'Starter Homes'. Help to Buy is already having an impact with 81% of purchasers using the product being first time buyers. An increase in HRRs for the 25 to 44 age group is supported not only by the NPPF objective of significantly boosting housing supply but also the advice contained within the Local Plan Expert Group (LPEG) recommendations to Government.

1.4 Alternatively should the housing requirement be lower taking into account factors such as the impact of Brexit and introduction of the standardised methodology for calculating Local Housing Need?

The HBF are supportive of Sunderland's decision to utilise a figure over and above the level provided by the standard methodology to help to support population aspirations, an increase in the working age population, to support sustainable development, to boost housing supply and to support economic growth aspirations for the area.

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Government have clearly set an objective to provide 300,000 homes each year, the HBF consider that it is important that all authorities, including Sunderland look to contribute to this provision.

2. The Employment OAN

2.1 Does the evidence base support the OAN of at least 95 ha of employment land?

The HBF do not wish to comment in relation to this question.

3. Alignment between housing and employment requirements

3.1 Is there sufficient alignment between housing and employment requirements?

The HBF consider that it is important for the Council to ensure there is sufficient alignment between the housing and employment requirements.

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Matter 5: Specific Housing Needs and Standards

Session 4 – 13.30 Wednesday 22 May 2019

This matter considers affordable housing, housing mix, housing standards and the needs of gypsies, travellers and travelling showpeople. In response to preliminary questions the Council has indicated that it will:

- *Update Policy H2 (affordable homes) to refer to 10 dwellings, clarify that off-site provision should be an exception and make it clear that the tenure split, and size of dwellings should reflect the latest available evidence;*
- *Include reference to the level of accessibility in the density criterion within Policy H1 (housing mix);*
- *Refer to the transitional period of 1 year for the implementation of the nationally described space standards (NDSS) within Policy BH1 (design quality);*
- *Clarify that Policy BH2 (sustainable design and construction) refers to major development as defined in the Glossary to the Framework;*
- *Modify Policy H6 (Houses in multiple occupation (HMO)) to refer to a good standard of living space within the HMO;*
- *Include site specific considerations for the travelling showpeople allocations (Policy H4)*

Issues

1. The justification for affordable housing targets in Policy H2, taking into account considerations such as viability

1.1 Is the requirement for at least 15% of dwellings on major developments justified by the evidence base including that relating to viability?

This policy requires all development of more than 10 dwellings, or on sites of 0.5ha or more, should provide at least 15% affordable housing. This requirement is based upon the Whole Plan Viability Assessment (2017). However, the report indicates viability constraints across Sunderland, particularly for brownfield sites, with paragraph 10.12 stating that the results indicate that the typologies representing the brownfield development are unable to bear the 15% affordable housing. However, for greenfield sites there are also viability concerns once the alternative values are used. For example, paragraph 10.22 sets out that the results comparing the Residual Value with the £900,000/ha Viability Threshold are less good, indicating that no sites, greenfield or brownfield, are likely to be viable in either the Washington area or North Sunderland. It is therefore questionable whether a 15% requirement is justified. Further alternatives in relation to increase build costs or reduced sales values also identify potential issues with viability.

The HBF supports the need to address the affordable housing requirements of the borough. The NPPF is, however, clear that the derivation of affordable housing policies must not only take account of need but also viability, this is set out in Paragraph 34 (2019) which states that such policies should not undermine the deliverability of the plan. Which replaces paragraph 173 of the former NPPF (2012) which established the importance of viability testing to ensure that the sites and scale of development identified in the Plan should not be subject to such scale of obligations and policy burden that their ability to be developed might be threatened. The Council should be mindful that it is unrealistic to negotiate every site on a one by one basis because the base-line aspiration of a policy or combination of policies is

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set too high as this will jeopardise future housing delivery. Therefore, site by site negotiations on these sites should occur occasionally rather than routinely.

1.2 Should the text of paragraph 6.23 relating to viability issues (or a summary) be included within Policy H2?

Whilst policy should be set at levels that take account of infrastructure and other policy requirements and should therefore be deliverable without the need for further viability assessment at the decision making stage, there will always be circumstances where this is not possible. Therefore, the HBF consider that a viability clause should be included within the policy, this could be the text from paragraph 6.23 or something similar.

2. The approach to tenure-split and clustering within Policy H2

2.1 Is the current tenure split (para 6.18) justified?

Paragraph 6.18 states that the Council will seek a tenure split of 80% affordable rent and 20% intermediate tenure, in accordance with the 2017 SHMA. This split is based on the household survey which identified tenure preferences of existing and newly forming households as set out in Table 7.9, which merges both social and affordable rent as one tenure preference. However, paragraphs 7.15 to 7.17 of the SHMA do set out the need for the Council to undertake further work to justify this split, including viability work, discussions with developers and housing associations and further work in relation to the housing register. Therefore, whilst it may improve the policy to refer to the latest evidence, it will need to be clear that the latest evidence is not just restricted to the SHMA and could include other sources including information from developers and housing associations.

Paragraph 4.47 of the Whole Plan Viability Assessment (2017), sets out that the viability assessment is based on a tenure mix of 75% affordable rent and 25% intermediate tenure (not the 80:20 from the policy). It is noted that the Viability Assessment also states that the 75% is affordable rent rather than social rent (which had been a merged category in the SHMA). It is noted that even with the less onerous 75% affordable rent that a significant number of site typologies are not considered viable. The HBF do not therefore consider that the tenure split is justified.

2.2 Will the requirement for small clusters affect the ability of registered providers to manage the housing stock, noting the proposed modification to para 6.21 which refers to clusters being proportionate in size?

The HBF do not wish to comment on question 2 at this time.

3. The approach to affordable housing exception sites

3.1 Is there justification for an affordable housing exception site policy?

The HBF do not wish to comment on question 3 at this time.

4. The effectiveness of Policy H1 in meeting the need for a mix of dwellings, including larger executive dwellings and those for older people

4.1 Are the terms of Policy H1 in relation to accommodation for older people likely to be effective and are they justified?

The HBF is generally supportive of providing homes for older people and those with special housing needs. Policy H1 part 2(ii) provides a generally flexible approach to the provision of

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suitable accommodation for older people, allowing developers to consider if their site is appropriate for older persons housing. However, the requirement set out in Policy H1 part 1(iv) is not considered justified in relation to the M4(2) standard. The concerns of the HBF in relation to this part of the policy are set out in our previous consultation responses and in relation to Question 7 of this Matter paper.

4.2 Is the requirement for developments to provide larger detached dwellings justified?

The HBF do not wish to comment on question 4.2 at this time.

5. The density provisions of Policy H1

5.1 Is criterion 1. iii of Policy H1, as proposed to be amended, likely to be effective in encouraging high density developments in suitable locations?

The HBF generally consider the policy to be effective in encouraging development of a density appropriate to the location and allowing for discussion and consideration to be taken on a site by site basis.

6. The requirements of Policy H1 for Self-Build/Custom Build Housing

6.1 Is criterion 3 of Policy H1 and the explanatory text likely to be effective in encouraging self-build and custom-build housing plots, noting the proposed modification to para 6.13?

Many of our members will be able to assist the custom build sector either through the physical building of dwellings on behalf of the homeowner or through the provision of plots for sale to custom builders. The HBF are, therefore, not opposed to the idea of increasing the self-build and custom build sector for its potential contribution to the overall housing supply. The HBF generally consider the flexibility provided by Policy H1 in relation to Self-Build / Custom Building Housing is appropriate to encourage housing plots for these uses. However, the HBF have concerns in relation to this policy approach which only changes the house building delivery mechanism from one form of house building company to another without any consequential additional contribution to boosting housing supply. The HBF would encourage the Council to engage with landowners and to work with custom build developers to maximise opportunities.

In relation to paragraph 6.13, the HBF consider the Council may want to consider the proposed modification to paragraph 6.13 as it is not clear what will be considered as 'appropriate self-build developments'.

7. The requirements of Policies H1 and BH2 for 10% accessible/adaptable, energy efficient and sustainably designed dwellings and the relationship to the Building Regulations

7.1 Is the requirement for 10% of dwellings on major developments to be accessible and adaptable (Building Regulations Part M4(2)) justified?

Policy H1 requires 10% of dwellings on developments of 10 or more dwellings to meet M4(2) category 2 – accessible and adaptable dwellings.

The HBF is generally supportive of providing homes for older and disabled persons. However, if the Council wishes to adopt the higher optional standards for accessible &

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adaptable homes the Council should only do so by applying the criteria set out in the PPG. It is incumbent on the Council to provide a local assessment evidencing the specific case for Sunderland which justifies the inclusion of optional higher standards for accessible / adaptable homes in its Local Plan policy. PPG (ID 56-007) identifies the type of evidence required to introduce such a policy, including the likely future need; the size, location, type and quality of dwellings needed; the accessibility and adaptability of the existing stock; how the needs vary across different housing tenures; and the overall viability.

The SHMA 2016, 2017 and the 2018 Addendum provides the Council's evidence for this policy. Unfortunately, this evidence is severely lacking on the majority of these elements. This lack of evidence does question how the percentages identified in the policy were derived.

The Addendum highlights evidence gathered as part of the 2015 household survey carried out as part of the 2016 SHMA. However, the SHMA 2016 highlights that the household survey was undertaken in 2012 with 4,104 questionnaires returned but re-weighted for 2016.

Whilst the HBF does not dispute the ageing population identified by the SHMA, it is not clear how this ageing population and potential future need reflects in the need for 10% of all new homes on sites of 10 or more dwellings to be provided at M4(2) standards. If it had been the Government's intention that generic statements identifying an ageing population justified adoption of the accessible & adaptable homes standards then the logical solution would have been to incorporate the M4(2) as mandatory via the Building Regulations which the Government has not done. The optional higher M4(2) standard should only be introduced on a "need to have" rather than a "nice to have" basis. Although there is evidence of an ageing population having regard to the PPG this does not amount to the justification required for the Council to include the optional standard as specified in Policy H1.

Whilst information is provided in relation to the number of households living in adapted properties, detail is not provided as to whether these adaptations are in line with the requirements of M4(2). It is also not clear exactly how this data is related to the future needs for homes to be provided at M4(2) standards.

No further information is provided in relation to the adaptability and accessibility of the existing stock, or the size, location, type and quality of dwellings needed based on future demand. It is considered that the policy lacks finesse with no regard to the type or location of the housing being provided.

The HBF considers that part iv of this policy is deleted in its entirety. However, if the policy is to be retained the HBF recommend that the flexibility of the policy should be increased to ensure that the policy does not undermine the viability and delivery of residential development in the area.

The HBF also recommend that the policy should:

- take into account site specific factors such as vulnerability to flooding, site topography and other circumstances which may make the site less suitable for M4(2) and M4(3) compliant dwellings as set out in PPG;

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- ensure that if step-free access is not viable that M4(2) and M4(3) should not be applied; and
- ensure an appropriate transitional period is included.

7.2 Are the requirements of Policy BH2 in relation to energy efficiency, energy use, materials and sustainability information justified and effective, having regard to the scope of the Building Regulations?

The HBF generally supports the promotion of sustainable design and construction, however, it does have concerns about some of the requirements of Policy BH2, particularly in relation to energy efficiency, energy use, materials and sustainability information, and does not consider that they are justified and effective.

This policy states that where possible major development should maximise energy efficiency and integrate the use of renewable and low carbon energy. The HBF is generally supportive of the use of low carbon and renewable energy. However, if this policy is to be applied as a requirement of development, then the HBF would query if this policy is in line with the Government's intentions as set out in Fixing the Foundations and the Housing Standards Review, which specifically identified energy requirements for new housing development to be a matter solely for Building Regulations with no optional standards.

The HBF has concerns that some of the information required within the policy may not be known at the time of submitting a planning application, such as the details of the type, life cycle and source of materials to be used.

The HBF also has concerns that the requirements of this policy could have the potential to add costs to the delivery of housing development and could have implications for the viability of sites. There are concerns that requirements such as these could lead to the non-delivery of homes. Therefore, the HBF recommend that the Council ensure that this policy is justified and consistent with national policy.

8. The justification for applying the NDSS (Policy BH1)

8.1 Is the application of the NDSS through Policy BH1 justified taking into account evidence on need, viability and timing?

This policy looks for development to meet national spaces standards as a minimum (for residential). However, these enhanced standards, as introduced by Government, are intended to be optional and can only be introduced where there is a clear need and they retain development viability. As such they were introduced on a 'need to have' rather than a 'nice to have' basis.

PPG (ID 56-020) identifies the type of evidence required to introduce such a policy. It states that 'where a need for internal space standards is identified, local planning authorities should provide justification for requiring internal space policies. Local planning authorities should take account of the following areas:

- **Need** – evidence should be provided on the size and type of dwellings currently being built in the area, to ensure the impacts of adopting space standards can be properly assessed, for example, to consider any potential impact on meeting demand for starter homes.

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- **Viability** – the impact of adopting the space standard should be considered as part of a plan's viability assessment with account taken of the impact of potentially larger dwellings on land supply. Local planning authorities will also need to consider impacts on affordability where a space standard is to be adopted.
- **Timing** – there may need to be a reasonable transitional period following adoption of a new policy on space standards to enable developers to factor the cost of space standards into future land acquisitions'.

The Council will need robust justifiable evidence to introduce any of the optional housing standards, based on the criteria set out above. The Council have produced the Internal Space Standards Report (July 2018) to try to address this evidence requirement. However, the evidence is provided is limited in terms of numbers of properties considered and the potential market comparisons made. It is not evident from the information provided what 'need' there actually is for properties built to the standards there is no evidence that these smaller properties are not selling, there is no evidence provided that customers are not satisfied with these properties or that these properties are not comparable to other properties available in the market area. The HBF consider that if the Government had just expected all properties to be built to NDSS that they would have made these standards mandatory not optional. It is also noted that there is no reference within the policy or the evidence in relation to timing or a transitional period.

The HBF consider that standards can, in some instances, have a negative impact upon viability, increase affordability issues and reduce customer choice. In terms of choice some developers will provide entry level two, three and four-bedroom properties which may not meet the optional nationally described space standards but are required to ensure that those on lower incomes can afford a property which has their required number of bedrooms. The industry knows its customers and what they want, our members would not sell homes below the enhanced standard size if they did not appeal to the market.

It is also noted that the Whole Plan Viability Assessment (August 2017) at paragraph 8.19 confirms that the viability assessment undertaken was on the basis that the Council were not introducing NDSS.

The HBF would also encourage the Council to consider the implications of the NDSS on the density of development and the land required to meet the housing requirement.

9. The approach of relying on the Unauthorised Encampment Policy (UEP) to deal with the need for a stop-over site identified in the Gypsy and Traveller and Travelling Showpeople Accommodation Assessment (GTAA)

9.1 Is the approach set out above positively prepared, justified and effective?

9.2 What provision, if any, is there in the Sub-Region for a stop-over site?

The HBF do not have any comments in relation question 9.

10. The terms of Policy H4 (Travelling Showpeople, Gypsies and travellers).

10.1 Is the allocation of travelling showpeople sites through Policy H4 justified by the evidence base?

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10.2 Will the site-specific criteria for the allocations be effective, including in relation to the living conditions of proposed and neighbouring residents and access arrangements?

The HBF do not have any comments in relation question 10.

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Matter 4: Housing Land Supply

Session 5 – 09.30 Thursday 23 May 2019

This matter considers how the housing requirement will be met; whether those means of meeting the requirement have been justified and will be effective; and whether the LP will be able to maintain a five-year housing land supply (HLS).

In response to preliminary questions the Council has indicated that:

- The Strategic Housing Land Availability Assessment (SHLAA) figure of 13,233 homes referred to in para 4.22 does not include the Housing Growth Areas (HGA's) identified in this Plan but does include sites likely to be allocated in the Allocations and Designations Plan (A & D Plan);*
- A table showing the components of housing land supply, similar to Table 22 of the Compliance Statement, will be included in the Plan;*
- The Plan includes a flexibility factor of 8.5% within the projected supply, taking into account SHLAA sites and the Strategic Sites and HGAs allocated in this Plan;*
- The evidence supports a small-sites allowance of 50 dpa but does not support a windfall allowance for larger sites as they are caught by the SHLAA threshold;*
- An updated HLS position (31 March 2019) will be provided to inform discussion at the hearings;*
- Additional text will be inserted into Section 6 of the Plan to summarise the five-year HLS position and the assumptions behind it; and,*
- The Council propose to produce a Housing Implementation Strategy (HIS) later in 2019.*
- Delivery from individual sites will be considered during Week 2 of the hearings.*

Issues

1. Components of Housing Supply

1.1 Will the up to date housing supply position be clearly shown in the Plan (base date of 31 March 2019)?

The HBF would expect the up to date supply position to be clearly shown within the Plan, along with information on how it will be monitored to ensure homes can be delivered.

1.2 Will the components of the housing supply that will meet the housing requirement be clearly shown in the Plan (Table 22 of the Compliance Statement refers)?

The HBF would expect the components of the housing supply that will meet the housing requirement to be set out within the Plan in a similar fashion to that set out within Table 22 of the Compliance Statement.

1.3 Is the small sites allowance of 50 dpa justified by compelling evidence?

The HBF consider that the small site allowance is only appropriate where it can be evidenced that these small sites will continue to come forward and that there will remain a deliverable supply of the plan period.

1.4 Is the flexibility factor of 8.5% sufficient to ensure that the housing requirement will be met over the Plan period?

The HBF strongly recommends that the plan allocates more sites than required to meet the housing requirement; as a buffer or flexibility factor. This buffer should be sufficient to deal with any under-delivery which is likely to occur from some sites. Such an approach would be

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consistent with the NPPF requirements for the plan to be positively prepared and flexible. The HBF recommends an appropriate contingency (circa at least 20%) to the overall housing land supply to provide sufficient flexibility for unforeseen circumstances and in acknowledgement that the housing requirement is a minimum not a maximum figure.

1.5 Is the allowance for demolitions of 20 units per year justified?

The HBF is supportive of the recognition by the Council that demolitions will continue to occur within the area and that an appropriate allowance is included. It is noted that demolitions have historically been higher than the allowance proposed, and whilst it is noted that this has been due to stock clearance, there may be scope for a more significant allowance.

2. The Housing Trajectory and HIS

2.1 Is the data that supports the Housing Trajectory (Figure 34) based on realistic assumptions?

The HBF would expect the Council base their Housing Trajectory on realistic assumptions. The HBF would expect to see more evidence from the Council on their engagement with site owners and developers to support the sites and the trajectory provided.

2.2 Will the HIS (when available) demonstrate that a five-year supply can be maintained through the plan period?

The HBF would expect the Council to be able to demonstrate that a five year housing land supply can be maintained, this could be within the Housing Implementation Strategy (HIS).

3. Five Year Housing Land Supply

3.1 Is the use of a 5% buffer to calculate the housing land supply position appropriate?

As the Sunderland Core Strategy and Development Plan was submitted before 24 January 2019 it is to be examined under the policies of the 2012 NPPF. Paragraph 47 of this NPPF provides details of when a 5% or 20% buffer should be used. It states that where there has been a record of persistent under delivery of housing, the Council should increase the buffer to 20%, it does not define persistent under delivery.

Year	Completions ¹	Housing Requirement	Difference
2009/10	380	700 ²	-320
2010/11	690	700	-10
2011/12	430	940 ³	-510
2012/13	330	940	-610
2013/14	510	940	-430
2014/15	910	940	-30
2015/16	700	745	-45
2016/17	590	745	-155

¹ Taken from CLG Live Housing Table 253: Permanent Dwellings started and completed by tenure and district (<https://www.gov.uk/government/statistical-data-sets/live-tables-on-house-building>)

² Housing Requirement from the NE RSS 2004-11 – 700dpa

³ Housing Requirement from the NE RSS 2011-16 – 940dpa (NE RSS revoked April 2013)

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2017/18	690	745	-55
2018/19		745	

Based on completions identified by MHCLG and the housing requirement proposed in the Sunderland Core Strategy and Development Plan and the NE RSS, there has been a record of persistent under delivery in Sunderland. This would suggest that a 20% buffer would be appropriate.

It is however, recognised that in reality once adopted that Plan will be used alongside the 2019 NPPF which states that the 20% buffer should be applied where there has been significant under delivery of housing over the previous three years, footnote 39 then states that from November 2018 this will be measured against the Housing Delivery Test, where this indicates that delivery was below 85% of the housing requirement. Based on the 2019 NPPF and the results of the 2018 Housing Delivery Test the 5% buffer is considered appropriate to calculate the housing land supply position.

3.2 Is the inclusion of 250 units from small sites justified taking into account the need to avoid double counting?

The Council will make an allowance for 50 residential dwellings each year on small sites (4 homes or less). The HBF consider that this is only appropriate where it can be evidenced that these small sites will continue to come forward and that there will remain a deliverable supply of the plan period. The HBF would expect the Council to ensure that this allowance would avoid double counting of any sites that have already been included e.g. because they have permission.

3.3 Generally, are the assumptions about the delivery from commitments and allocations realistic taking into account past completions?

The HBF does not wish to comment upon the acceptability or otherwise of individual sites. It is, however, important that all the sites contained within the plan are deliverable over the plan period and planned to an appropriate strategy. The Council's assumptions on sites in relation to delivery and capacity should be realistic based on evidence supported by the parties responsible for housing delivery and sense checked by the Council based on local knowledge and historical empirical data.

3.4 Are lead in times and build out rates realistic?

Appendix J of the SHLAA 2018 appears to show average build rates over then period 2009/10 to 2017/18, for different sizes of site. The build out rates vary from 32.87 dpa for sites of more than 150 dwellings to 3dpa for sites of less than 10 dwellings⁴. It is not entirely clear how this information has been utilised in determining the build out rates for sites. It also not clear how the lead in times have been determined.

Table 5 in the SHLAA sets out the assumptions used in the SHLAA in relation to the build out rates and lead in times. It is not evident whether this has then been agreed with the land owner and developer of each of the sites, or what other engagement may have occurred.

⁴ Over 150 = 32.87, 101 to 150 = 31.31, 51 to 100 = 18.27, 11 to 50 = 8.14, up to 10 = 3.11.

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3.5 Will there be a five year supply of deliverable housing sites on adoption of the LP?

The HBF does not wish to comment upon the acceptability or otherwise of individual sites. However, there is little evidence provided to support the deliverability of the sites included within the 5-year supply. The HBF would therefore encourage the Council to ensure that a 5-year supply can be provided.

4. The wording of the Policy SP8

4.1 Will Policy SP8 as worded be effective in ensuring the delivery of at least 745 dpa?

The HBF support the Council in working with partners and landowners to seek to exceed the minimum target of 745 additional dwellings per year. Although it could benefit from the addition of 'net' additional dwellings each year, as it has already been indicated that the Council consider that demolitions and loss of dwellings will continue to occur.

4.2 Should the policy refer to measures that would be implemented in the event of under-delivery against the minimum target or does the Housing Delivery Test contained within the 2019 Framework provide sufficient safeguards in this respect?

Whilst the Housing Delivery Test (HDT) will help to ensure that the standard methodology OAN is met, it will not ensure that the housing requirement as set out in the Core Strategy and Development Plan is met. It will be for the Council to monitor this delivery of the Plan including the housing requirement. If the housing requirement is not being delivered it may be beneficial for the Council to include within the Local Plan what actions they will take to ensure that the housing requirement is met in future. This could include measures highlighted within SP8.