

Development Plans
Planning Service
Liverpool City Council
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SENT BY EMAIL
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31/10/2019

Dear Sir / Madam,

**LIVERPOOL DRAFT STRATEGIC HOUSING LAND AVAILABILITY
ASSESSMENT (SHLAA) 2018**

Thank you for consulting with the Home Builders Federation on the Liverpool Strategic Housing Land Availability Assessment (SHLAA) 2018.

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.

The HBF would like to recommend that the Council review their housing commitments and Site Allocations set out within the SHLAA to ensure that they are in line with the NPPF 2019 requirements.

Paragraph 73 of the NPPF 2019 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. The NPPF states that for sites 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.

The SHLAA states that at April 2018, there was a supply of '29,765 dwellings, from 410 'committed' sites, comprising 355 sites with extant planning permission, 55 sites on which planning permission was expected to be granted imminently after the base date (with a resolution to approve subject to the completion of a Section 106 legal agreement), including five emerging Local Plan Site Allocations'. However, it is not apparent from Appendix 3 or 4 which sites have detailed consents, or which have yet to be consented.

The SHLAA goes on to state that Liverpool City Council has undertaken a delivery profile assessment for each of the committed sites. These delivery profiles or any communication with developers does not appear to have been detailed within the report. Therefore, it is difficult to comment whether these assumptions are correct. There is also no information within the appendices which evidence that housing completions will begin on these sites within the five years.

The HBF considers that the Council should note the content of the PPG, which provides further guidance on how to demonstrate a five -year housing land supply. It states that in order to demonstrate five years' worth of deliverable housing sites, robust, up to date evidence needs to be available. It goes on to suggest that, that evidence could include current planning status (e.g. how much progress has been made towards a reserved or full planning application, or discharge of conditions); a written agreement between the local planning authority and the site developer setting out the developers delivery intentions; firm progress with site assessment work; or clear relevant information about site viability, ownership constraints or infrastructure provision, such as successful participation in bids for large-scale infrastructure funding or other similar projects.

The HBF would strongly recommend that the Council review their supply to ensure it is deliverable and to ensure that they have the appropriate evidence to support that deliverability.

It is noted that the longer term supply, six years and onwards, includes a windfall contribution of 709 dwellings per annum (dpa). The SHLAA states that Liverpool City Council have altered their calculation of the windfall supply, which has led to an increase from a windfall allowance of 130 dpa to 709dpa. This is a significant increase, and no real detail has been provided as to how the recalculation has led to such a dramatic change. No data has been provided within the report to allow for an assessment of whether this change is appropriate, but it seems unlikely that such a significant change is appropriate. It is noted that this windfall allowance would represent more than 40% of the overall housing requirement of 1,739 net additional dwellings per annum. It should also be noted that the Council are likely to adopt their Local Plan within the first five years of this SHLAA which should lead to a decrease in the numbers of sites coming forward from windfall development.

The HBF would strongly recommend that the Council reconsider the approach taken to the windfall allowance.

It is also noted that the longer term supply, six years and onwards, includes a demolition allowance of 10dpa. The SHLAA notes that this is based on recent past trends, the SHLAA does not provide any further data in relation to what period was considered or what the actual data was that lead to this assumption. The HBF would recommend further evidence is provided to support this allowance and to ensure that the correct figure has been included.

Future Engagement

I trust that the Council will find these comments. I would be happy to discuss these issues in greater detail or assist in facilitating discussions with the wider house building industry. Please use the contact details provided below for future correspondence.

Yours sincerely,

A handwritten signature in cursive script, appearing to read 'Joanne Harding', written in black ink.

Joanne Harding

Local Plans Manager – North

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